Eve O'Sullivan

Subject:

Technical Amendment request W0003-03

Attachments:

0003-03-EPA-18-01.pdf

Importance:

High

From: David Naughton [mailto:David.Naughton@greenstar.ie]

Sent: 28 November 2018 10:23 **To:** Licensing Staff < licensing@epa.ie>

Subject: Technical Amendment request W0003-03

Importance: High

To whom it concerns,

Please see letter attached for the technical amendment request to store waste overnight in waste facility W0003-03. We request that this TA request be processed as soon as possible prior to the busy Christmas period.

Best Regards





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Our company is a part of the Beauparc Utility Group.

To find out more about our Plan Management, please see www.beauparc.ie





Because homelessness is everywhere this Christmas we are proud to support the Simon House Of Cards appeal.



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Environmental Protection Agency, EPA Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford, Y35 W821.

28th November 2018.

Panda Ref: 0003-EPA-01-18.

EPA Ref: TA regarding overnight storage of waste

Dear Ms Wylde,

I refer to our conversation earlier regarding an update on the Technical Amendment request for the overnight storage of waste at the Ballymount Baling Station Facility (EPA Ref W0003-03) submitted on the Eden platform on the 10th August 2018.

The South Dublin County Council facility, that we operate on behalf of SDCC (W0003-03) is authorised for the acceptance and processing of MSW waste (Monday to Saturday 6.30am to 8pm, excluding public holidays), however the licence stipulates that all waste must be removed off site by the end of the day with floors cleaned. This poses operational issues as waste collection in the Dublin area is 24/7. The facility operates an odour control unit to mitigate against any potential odour issues, however even though waste is removed from site daily, the odour control unit is operational 24/7.

Due to the limited hours of waste acceptance, any MSW collected (outside of the waste acceptance hours of W0003-03) by the company is diverted to our waste transfer facility nearby (W0039-02) that is authorised to accept waste 24/7. W0039-02 is located 800 metres from W0003-03. The morning after night time collections this waste is reloaded and delivered to W0003-03 for processing. Needless to say this practice is not best practice environmentally, economically and logistically.

On the 3rd July 2018, senior management in Panda met with Office of Environmental Enforcement staff (Pat Byrne and Carol O'Sullivan). At this meeting, the subject of MSW acceptance and potential odour issues from W0039-02 was discussed. OEE suggested to us that we should submit a TA request to licencing to amend the licence for W0003-03 for the overnight storage of waste and OEE would support such a request.













We are fast approaching the busy Christmas period where W0003-03 has restricted waste acceptance hours due to public holidays; we will be more reliant on W0039-02. We are hoping to have the licence for W0003-03 amended to enable us store waste in a building with an operational odour control unit so as to prevent any potential odour nuisances that may occur.

We are hoping that licencing can progress this technical amendment request in order for us to use this facility prior to the Christmas period and thereafter. If you require any further information, please do not hesitate to contact me.

Kind Regards,

David Naughton.

Group Environmental Manager.











