



### Objection

Objector:	Mr Garrett Leech
Organisation Name:	Advanced Environmental Solutions Ireland Ltd.
Objector Address:	Cappincur Industrial Estate, Cappincur, Tullamore, Co. Offaly.
Objection Title:	Objection #OS006060 - Applicant objection for Reg No:[W0104-04]
Objection Reference No.:	OS006060
Objection Received:	14 May 2020
Objector Type:	Applicant
Oral Hearing Requested?	No

### Application

Applicant:	Advanced Environmental Solutions (Ireland) Limited
Reg. No.:	W0104-04

See below for Objection details.

Attachments are displayed on the following page(s).

EPA Licencing,  
PO Box 3000  
Johnstown Castle Estate  
County Wexford  
Y35 W821

AES Bord na Móna,  
Main Street, Newbridge,  
Co. Kildare  
W12 XR59

T: 0818 650 655  
O45 580 060  
E: info@aesir.ie

14<sup>th</sup> May 2020

## Re: Objection to Proposed Determination W0104-04

To whom it concerns,

As per 87(6&7) of the Environmental Protection Act, 1992, Advanced Environmental Solutions Ireland (Ltd), "AES" wish to object to Proposed Determination W0104-04. In this instance, AES is the licensee.

AES wish to state that they welcome this licence review of which they instigated themselves, however there are some conditions contained in the PD which are considered unnecessary and over onerous from either an expense and/or resource perspective. Specific details will be provided with each condition objected to below:

**Condition 3.17:** *The licensee shall operate a weather monitoring station on the site at a location agreed by the Agency, which records conditions of wind speed and wind direction.*

**Reason for Objection:** The site at Tullamore has no history of odour complaints, the Inspector in her report states "There has not been a complaint made to the Agency since 2013." The historic complaints prior to 2013 made to the Agency were that of noise and not odour. The inclusion of this condition would add unnecessary expense to both purchase & maintain.

**Condition 8.8.9:** *The licensee shall maintain a list of the List of Waste codes that are authorised for acceptance at the installation. New waste codes may be added to the list if agreed by the Agency.*

**Reason for Objection:** In the Introduction of the PD it states that AES is authorised to accept non-hazardous waste to include Municipal Solid Waste, Commercial & Industrial and Construction & Demolition Waste. AES believe that to specify and maintain LoW register at the site would create what the Licensee considers, an unnecessary work load. We also consider that gaining authorisation for a requested waste type would take longer to get permission that we would commercially require. The Agency receive an Annual Environmental Report from us that specifies all the non-hazardous wastes that we have accepted in a given year, they also have the ability to audit us when the need arises. It is considered that a list of accepted wastes could be produced if requested. AES only intend to accept non-hazardous waste at the facility.


**Condition 8.10.5:** *Where bales of waste are stored, the licensee shall maintain and implement a bale identity and tracking system. Each bale shall be labelled with: -Its date of production; -Its content and LOW code and the name of the location where the bale was produced and its licence register number.*

**Reason for Objection:** This is a new condition, to comply with this would place a large strain on our yard resources who are already very busy. AES do not see the benefit of such rigorous labelling given the huge volume of bales we currently process at the site. Clearly all waste is coded & weighed as it leaves the site as it is.

**Schedule C.2.3:** *Monitoring of Storm Water Emissions.*

**Reason for Objection:** We note the addition of parameters to the weekly suite that were not present before; e.g. Total Ammonia & Total Nitrogen, Total Suspended Solids & Total Organic Carbon. These parameters require a sample to be obtained and transported to an external laboratory. This requirement will place an additional workload and expense to ensure compliance. We request that they are removed from the weekly schedule.

Yours Sincerely,



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**Garrett Leech**

Environmental Manager

AES Bord na Mona

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