
From: Ted Nealon [mailto:Ted.Nealon@A1Waste.ie]
Sent: 30 September 2008 17:12
To: Jonathan Derham
Subject: Pre-Treatment and Residuals Management Consultation

Jonathan,

Hi, thanks for the opportunity for Dean Waste Co. Ltd to comment on the document. Obviously, we are all aware that urgent action needs to be taken to achieve the landfill directive targets and to encourage the market to take the necessary steps to install biological waste treatment infrastructure.

In all it's a fairly clear document. However, I can foresee problems in the section Minimum Pre-Treatment Obligations. I do not think that it will be possible for a landfill operator to demonstrate to the EPA that all waste has been properly pretreated. This is because landfills accept waste from a number of waste contractors and collectors which arrives in a variety of vehicles, many of them enclosed. It will be possible to have contracts with waste suppliers that all waste is adequately pre-treated but it will be very difficult, and probably impossible, to prove whether it is or not. Even if landfill operators only accept waste from proper pre-treatment facilities, it is still impossible to prove that all the waste which passed through those facilities were adequately and properly pre-treated.

I think there is also a problem with Figure 5. The 3rd bin mixed organics are shown only to go for biological treatment and then thermal treatment or as stabilized waste. However, the expectation of the industry, and I believe the Minister, is that such wastes will be of a quality that after composting it will, similar to green waste, be capable of entering the high grade compost market.

As regards the section on Validation of Treatment Effort, waste delivered to landfills may come in the one vehicle from a number of sources. For example, it can be a mixture of urban and rural households which were collected from.

Figure 6, I do not think that it will be possible to measure how much of biowaste which is accepted at a landfill has been biologically pre-treated. An estimate may be possible however but that will depend on waste characterization studies and the composition of the waste will change as a result of these initiatives making it difficult to be accurate.

The paper does not clarify what Stabilized Biowaste will constitute in terms of biowaste being disposed of to landfill. I presume that if the treated waste achieves the target for Stabilized Biowaste it will not constitute biowaste at all. I guess some guidance on the amount of testing required, i.e. what percentage of the waste landfilled must be tested or how many tests per 1,000 tonnes, would be useful to the industry and would help estimate costs. Of course, once a testing regime is introduced, there will always be some failures, so some guidance on what failures mean and what to do about them

01/10/2008

would also be helpful to the industry. Another thought which occurs to me is what happens to the waste while the test results are awaited? Should the onus be on the waste supplier to have carried out the testing before delivery to the landfill and would this mean that waste has to sit in a transfer station for a period of time, days presumably, until the test results arrive. Alternatively, if the waste is accepted at the landfill without the testing being done, what happens to the waste at the landfill until the test results are received?

I hope these comments are of some help.

Kind regards,

Ted

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