

M^T
G**MULLEADY'S LTD**M^T
G**WASTE MANAGEMENT DIVISION**

CLOONAUGH, DRUMLISH, CO. LONGFORD, EIRE

Telephone: (043) 24145 / 24128 • Fax: (043) 24731

Website: www.mulleadygroup.com Email: wastemanagement@mulleadays.com

EPA Waste Licence No.: W0169-01

CC - Laura Barker
/ M

Dr Jonathan Derham
Licensing Unit
Office of Climate, Licensing & Resource Use
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Wexford

**Environmental Protection
Agency**

03 OCT 2008

October 2nd 2008

Our Ref: MULL02102008

**Re: National Consultation in respect of an EPA Proposes Municipal Solid Waste
Pre-Treatment and Residuals Management initiative**

Dear Sir

We as a Waste Management Contractor with an EPA Licensed Facility would like to express our views mainly on the collection of biodegradable waste and recycling waste, it is suggested that a Three Bin is the most preferred method, one Bin for biodegradable waste, one Bin for recycling waste and one Bin for residual waste.

I disagree with this system for the following reasons. The amount of collections will change from 52 per year to 78 per year as biodegradable waste will have to be collected on alternative weeks the same as recycling waste. This is a major cost to waste contractors, unless you use Twin Compartment Lorries, which are very expensive and very expensive to maintain.

We have carefully monitored tests carried out by RPS on behalf of the EPA at our Longford Civic Amenity and from these tests it is quite evident that the Black Bin now been used for everything except recycling waste to be put biodegradable waste and allow nappies, ashes and certain other material in this bin, send the content of this bin for composting and whatever materials that would not breakdown during this process, can be screened out so you would be left with a high grade compost. Screened element of plastic and any other material can be recycled / recovered.

Everything else that is left can be put into the Recycling Bin which then can be put over a picking line. All contaminants can be removed and you are left with clean recyclable / recovery material.

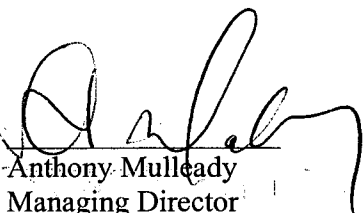
I am very confident that this system will work and that you will get at least 25% more recycling / recovery. You will get a much greater participation rate from the public, you will have 52 collections per year and the customer will save money because material that they would put into the Residual Bin will now be recycled free of charge. In some situations an extra Bin or Bag for recycling waste will be given to the customer, but that is a small price to pay.

We have carried out numerous tests from putting the content of Black Bins through our trommell with a 50mm aperture and getting 50% in weight 0mm to 50mm fines, then putting the ≥ 50 mm plus over our picking line and recovering 54% recycling and recoverable material.

I am very confident that with proper explanation and leaflet to the public 75% material can be composted and recycled / recovered.

If you wish to further explore my ideas, we will be carrying out a Pilot Scheme over the next month and the results will be available then.

Yours Sincerely



Anthony Mulleady
Managing Director