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Ms. Elizabeth Leacy,
 Office of Climate, Licensing, & Resource Use,
 Environmental Protection Agency,
 P.O. Box 3000,
 Johnstown Castle Estate,
 Co. Wexford.

30th November 2015

Reg No. P1013-01

Dear Ms Leacy,

I refer to your letter of 10th June 2015 in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, requiring further information, and our subsequent correspondence. We are now in a position to respond as follows:

1. Attachment B.6 of the licence application form requires a summary of all previous planning permissions granted for the site of the activity to be provided. Please complete the following table. Include in each case confirmation of whether an EIS was required with the planning application, or alternatively provide a letter from Meath Co. Co. stating, in each case that EIA was not required.

Response: The planning history of the facility is summarised in the EIS Volume 2 Section 1, Page 8 Table 1. It is repeated below for convenience. There was no requirement for an EIS for any permission other than the most recent one 14/777.

In addition Appendix 1 of this response includes a narrative from Tom Phillips & Associates in relation to the planning history of the site and a copy of the recent decision from An Bord Planeala.

Table 1: Planning Permissions Granted

Planning File Reference	Applicant	Development	Date of Decision
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- | | |
|--|--|
| <ul style="list-style-type: none"> • Environmental Impact Assessment/EIS • Environmental Monitoring and Sampling • Waste Management • Environmental Reporting • Ecology • Project Management • Training | <ul style="list-style-type: none"> • IPPC/Waste Licencing • EMS/ISO14001 Design, Implementation and Auditing • Environmental Compliance • Planning • Waste Management Facility/Collection Permits • Environmental Risk Assessment/ Due Diligence • Commercial Tenders |
|--|--|

DA40563	Peter Joseph Barry	Meath County Council granted permission for the construction of a 0.55 hectare paved area to provide a compost pad with a 0.075 hectare integrated constructed wetland for green bio-mass on site.	27/05/2005
DA60440	Peter Joseph Barry	Meath County Council granted permission for the construction of a 432 sq.m agricultural shed for the storage of timber.	09/11/2006
DA801986	Peter Joseph Barry	Meath County Council granted permission for the development of a 0.45 ha enclosed facility for making agricultural and horticultural composts and other soil composts. This facility will consist of an enclosed reception area for incoming material, 5 No. enclosed concrete tunnels, and an enclosed area for the storage and blending of materials.	21/08/2008
DA120420	Peter Joseph Barry	Meath County Council granted permission for the development of a 144 sq.m shed for the storage of logs, farm machinery and other general agricultural products.	06/07/2012
DA 140332	Peter Joseph Barry	Meath County Council granted permission for an Airlock enclosure, a new Educational and office building of 96 sq m. and associated water treatment and percolation area and retention permission for an extension to the permitted agricultural shed, a portacabin for use as weighbridge office, topsoil storage areas, a polytunnel of 54 sq m and 6 containers for storage.	17/07/2014

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2. Confirm whether a waste quarantine area is in place at the installation and if so, state its location.

Response: There are two waste quarantine areas in place at the installation. These are shown on Drawings Figure 8 as Q1 and Q2. Q1 is for any non-conforming material that comes in as part of the green garden material and Q2 is for any non-conforming material that comes in as part of the material for tunnel composting.

3. Provide a copy of the current Waste Facility Permit in place for the activity.

Response: A copy of the current Waste Facility Permit No. WFP-MH-08-0004-02 is attached as Appendix 3 of this response.

4. Monitoring results are provided in the EIS as follows:

Surface water monitoring at SW1 for March 2014 and June 2014 are provided in Table 5 of the EIS (p19 of 114) and the most recent monitoring for GW1 and GW2 is provided in Table 6 of the EIS (p22 of 114).

Additional surface water monitoring has been carried out since this time and the results are appended in Appendix 4.

Noise, Air and Dust monitoring up to the end of 2013 is provided in Volume 3 Appendix 5 of the EIS. Additional monitoring carried out since then is appended in Appendix 4 of this document.

5. Enlarged (size A0) drawings of existing and proposed surface water management – Drawings Figure 7 & 8 are attached. See Appendix 5 of this response.

6. The location of the Oakstown BAF treatment system is shown on Drawing 8 labelled septic tank. The location of the percolation area is highlighted in green and labelled Oakstown BAF system.

7. Tables E.1 (ii) and E.1 (iii) have been completed in relation to the bio-filter and are attached in Appendix 7

8. We confirm that the additional bio-filtration capacity refers to a new additional biofilter which will be constructed.

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9. Surface water emission point SW2 is proposed. The nature of the emission as per E2 is surface water from the yard area. This will pass through a silt-trap and interceptor before being attenuated in the woodland and eventually entering the drainage network. The proposed location of the SW2 point is clearly designated on Drawing 8.

10. There are no proposed emissions to ground. The surface water management provides for interceptors, silt traps and percolation/retention areas prior to discharge to the local surface water management systems ie drainage ditches.

(a) Tables E4(i) and E4 (ii) are not completed because there are no proposed discharges to groundwater.

(b) Table 11 in Attachment E6 was not completed for the two remaining discharges because they merely represent attenuation points for rainwater from the roof areas.

(c) We confirm that groundwater sampling will be carried out at GW1 and GW2 at a frequency determined by the Agency.

(d) Borehole drilling records for the wells are not available

11. Enrich has been operating from the facility since 2005, and has historically enjoyed very good relationships with all our neighbours however in September 2014 when planning permission was submitted for works to increase the capacity of the facility a few of these relationship deteriorated.

Since then there have been frequent complaints from a small number of individuals.

The complaints have related to a variety of different aspects, from the size of the trucks on the road, noise of fans, dust, odour and general adverse impacts on health. Every complaint has been investigated and most have been deemed to be without foundation.

The facility has been scrutinised by enforcement staff from Meath County Council on numerous occasions.

12. Provide additional details relating to relevant hazardous substances (as defined in Section 3 of the Act of 1992), as follows:

(a) Outline whether any of the chemicals listed as raw and ancillary materials in Attachment G1 and table G1(i) are considered relevant hazardous substances in the context of the Regulation 9(2)n

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(b) If any of the chemicals listed as raw and ancillary materials are considered relevant hazardous substances a Baseline Report must be submitted to comply with the requirements of Regulation 9(2)n and the European Commission's guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions.

The material stored on the site that falls into the above category is diesel fuel which is stored in an appropriately bunded tank with integrity certificates retained in the site office.

There has not been any groundwater or soil monitoring carried out other than analysis of the well water which is deemed suitable for drinking purposes.

The Enrich facility was originally agricultural land and as such the baseline conditions are that of a greenfield site. This approach was agreed with the Agency at the pre-application meeting.

13. Identify what would comprise abnormal working conditions and provide details on the measures to be taken under abnormal working conditions.

Any emergency would be deemed to be abnormal working conditions such as a large scale spillage, fire or contamination of the local water supply. Enrich Environmental Ltd has in place, an Emergency Response Procedure for such an occasion with designated personnel responsible for actions to ensure that such emergency is addressed in the most effective manner possible.

In addition to the above abnormal working conditions may arise due to extreme weather such as snow, strong winds etc. The senior management at Enrich are sufficiently hands on and experienced to manage such a situation and determine the appropriate course of action. In the event of extreme weather the facility will likely cease acceptance of waste until the situation improves.

14. State the maximum quantity of waste and other materials (in tonnes or cubic metres) that will be stored at the installation at any one time, broken down as follows:

(a) Indoor Waste storage and treatment areas

Potentially there could be 3840 tons of waste within the indoor storage and treatment area. This is made up of the contents of 6 tunnels being full and 6 tunnels being removed to the maturation area. This would mean a total of 12 tunnels being on site. The contents of each tunnel is 350-400 tons, hence a total original tonnage of 4800. Given that each batch will be at a different stages in the

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composting process a conservative estimate of 20% mass loss has been applied, thereby arising at the 3840 figure.

(b) Outdoor waste storage and treatment areas

Up to 2000 tons of material may be contained on the outdoor composting pad. This is based on past practical experience.

(c) Compost storage area building

This will be highly influenced by seasonal demand for end products. During the winter when demand is less up to 1000 tons of finished compost may be stored. This is based on the volume of storage and the finished compost having a bulk density of approximately 550kg/m³

(d) Waste in quarantine Area

Given the stringent pre acceptance criteria in place at the facility it is unlikely that large amounts of non-conforming waste will be unloaded at the facility. If such material is delivered it will be reloaded into the same vehicle. This means that it is not considered likely that any waste will be retained within the quarantine area.

15. State the maximum unit cost (per tonne or cubic metre) for the removal and disposal of waste and other materials in the event of unexpected closure of the installation, bearing in mind that waste might have degraded in the interim period before removal and might have little or No recoverable monetary value.

The material within the indoor waste storage and treatment areas will have been mechanically separated and meet the criteria outlined in the recent Department of Environmental Circular WP 11.15 as attached in Appendix 15. This means that the likely disposal cost associated with such material will be in the range of €30-35 per ton.

Given that green garden material will be stored in the outdoor area and the strong market demand for this material. There is no cost associated with this disposal.

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Only finished products will be stored in the compost storage area. The Enrich business is based on the production and sale of high quality end products, typically Enrich wholesale compost products for €30-60 per ton. There will be no disposal costs associated with this.

Waste in quarantine area will be non-conforming and likely to incur a disposal charge of €90-110 per ton.

16. The list of EWC Codes in Appendix 2 has been amended and attached to this document in Appendix 16. The process that a particular waste stream will undergo at Enrich Environmental Ltd will depend upon the origin of the material and whether or not it is subject to animal by-products regulations. With this in mind most products can be treated in either open windrows or in-vessel composting and the list attached reflects that. Materials that can only be processed in-vessel are highlighted. It is not possible to quantify the individual waste streams as this will depend on the market and the type of blending in process at the facility at the time.

17. The proposal to accept and treat MSW for drying/stabilisation in the event of there being an inadequate supply of biodegradable municipal waste is submitted on a worst case scenario basis and is deemed to be an extremely unlikely scenario. However the company is making this request to cover all eventualities. Should this worst case scenario occur the company will accept MSW only into its composting vessels and this amount will be up to 40,000 tonnes per annum.

Please also find attached an amended non-technical summary and an amended Attachment L to correct a typographical error in the one originally submitted.

If you have any queries please contact the undersigned.

Yours sincerely

Jim Dowdall

Enviroguide Consulting

(on behalf of Enrich Environmental Ltd)

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