

Patrick Doyle

From: Fiona Byrne [REDACTED]
Sent: 05 September 2017 10:18
To: Licensing Staff
Subject: New submission entered for Reg no: W0185-02. (Reference Number: W0185-02-170905101721)
Attachments: W0185-02 Rilta Envir Ltd Cover Letter.pdf; W0185-02 Rilta Environmental Ltd Report.docx
Importance: High

Title: Miss
First Name: Fiona
SurName: Byrne
Organisation Name: HSE
Address Line 1: Environmental Health Department
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Address Line 3: Tallaght
County: Dublin
Post Code:
Email: [REDACTED]

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

ENVIRONMENTAL HEALTH DEPARTMENT
4th Floor, Chambers House
Chambers Square
Tallaght
Dublin 24

Telephone 01 4686384
Email [REDACTED]

Ms. Dorota Richards,
Programme Officer,
Environmental Licensing Programme,
Office of Environmental Sustainability,
Licensing and Resource Use,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford
Y35 W821.

Date: 05/09/2017

Type of Consultation: Environmental Licence Review.
Reference Number: EPA Reg No. WO185-02-EHIS 0653.
Applicant: Rilta Environmental Limited,
Facility Location: Site No 14 A1 Greenogue Business Park, Rathcoole,
County Dublin
Class & Nature of Activity: 11.1 -The recovery or disposal of waste in a facility, within the meaning of the Waste Management Act, 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required;
11.2(b) – Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving the following activities: (b) physico-chemical treatment (c) blending or mixing prior to submission to any of the other activities listed in paragraph 11.2 or 11.3 (d) repackaging prior to submission to any of the other activities listed in paragraph 11.2 or 11.3 (f) recycling or reclamation of inorganic materials other than metals or metal compounds 11.6 ; Temporary storage of hazardous waste, (other than waste referred to in paragraph 11.5) pending any of the activities referred to in paragraph 11.2, 11.3, 11.5 or 11.7 with a total capacity exceeding 50 tonnes, other than temporary storage, pending collection, on the site where the waste is generated.

Dear Ms. Richards,

In response to the notification of this application, the following HSE departments were made aware of the application on 04 August 2017.

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher, Estates Manager – Environmental Services
- Assistant National Director for Health Protection – Kevin Kelleher / Marie Woods
- CHO – David Walsh

This Industrial Emissions Licence was assessed with respect to Environmental Health (EH) Impacts of the activity as outlined in the application. The assessment consisted of a study of the application and associated correspondence and documentation on the EPA website.

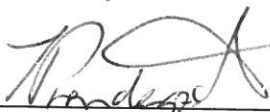
No submissions were received from the above departments at the time of sending this letter.

No complaints in relation to the past or present operations at this facility have been received by this department regarding its operation.

- We have made observations and submissions under the following specific area;
 - Noise
 - Dust and Ash Waste Emissions

I herein endorse the EH service response to the proposal is in the attached consultation report.

Yours sincerely,



Tom Prendergast
Principal Environmental Health Officer



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Health Service Executive

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Mr. Tom Prendergast
Principal Environmental Health Officer
Environmental Health Office
4th Floor, Chambers House
Chambers Square
Tallaght
Dublin 24

Date: 05/09/2017

Type of Consultation: Industrial Emissions Licence Review.
Reference Number: EPA Reg No. W0185-02. EHIS 0653.
Applicant: RILTA Environmental Limited (RILTA)
Facility Location: Site No 14 A1, Greenogue Business Park, Rathcoole, County Dublin
Class & Nature of Activity: 11.1 -The recovery or disposal of waste in a facility, within the meaning of the Waste Management Act, 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required;
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Dear Tom,

I refer to the submission of an application to the EPA for a review of its Industrial Emissions License Reg No. W0185-02 by RILTA Environmental Limited (RILTA).

This licence review application was received by the HSE on the 04 August 2017 and a review of the documentation submitted by the applicant was subsequently conducted.

Requirement for Review

RILTA Environmental Limited (RILTA) is applying to the Environmental Protection Agency (EPA) for a review of its Industrial Emissions Licence (Register Number: W0185-01) for its existing Hazardous Waste Transfer Station at Site No 14 A1, Greenogue Business Park, Rathcoole, County Dublin. It is proposed to accept flue gas treatment residues (referred to as air pollution control residue (APCR), and transfer the material abroad for disposal/recovery. The material is classified as hazardous.

The installation is authorised to accept up to 60,000 tonnes of waste comprising 27,000 tonnes of non-hazardous household, commercial and industrial, construction and demolition wastes, sewage and industrial sludges, and 33,000 tonnes of hazardous waste.

On-going activities include the acceptance and processing of electrical transformers inside the warehouse, the storage and onward transfer of batteries and the short term storage of refrigerators.

It is proposed to install a bagging plant and pallet racking for the storage and transfer of the APCR. Approximately 30,000 tonnes of APCR will be accepted, bagged and temporarily stored at the installation annually. The APCR will be delivered in road tankers that will drive into the Warehouse where the materials will be pneumatically transferred into the storage silos located in the south-west corner of the building. The APCR will be discharged from the silos into the duty bagging unit where bulk bags will be filled. The bags will then be stored on the pallet racking until they are transferred from the installation by articulated trailer.

Location

The existing site encompasses 0.5ha and there are three adjoining buildings-Warehouse, Chemical Store and the Offices. There is a weighbridge at the site entrance and a covered Tanker Bay.

The facility is located in the Greenogue Business Park, approximately 1.5km east of Newcastle. The surrounding land use is a mix of commercial and industrial activities.

Noise

The current Industrial Emissions Licence requires annual noise monitoring to be conducted at three nearby noise sensitive locations. The current license sets noise emission levels of 55 (daytime) and 45 (night time) dB(A) at any noise sensitive location. According to the Industrial Emissions Activities License application form noise emissions from the bagging plant will be lower than those from equipment that previously operated at the installation.

Recommendation

- 1. The current noise conditions, noise limits and noise monitoring requirements specified in Industrial Emissions License W0185-01 regarding noise surveys, noise limits and tonal noise should remain on Industrial Emissions License W0185-02.**

Dust and Ash Waste Emissions

Due to the nature of the process the issue of dust emissions has a potential impact. This issue is however considered and addressed in both the detailed report submitted by Rilta and also conditions already present in W0185-01. All handling (delivery, bagging, storage and onward shipment) will be conducted indoors and or in a sealed environment limiting the potential for dust emissions. Furthermore it is noted that the bagging activity is effectively a closed system with little emissions. Further control measures such as fast shutter roller doors are also present with dust curtains as per W0185-01.


Recommendation

- 2. The dust monitoring requirements specified in Industrial Emissions License W0185-01 regarding dust monitoring locations, frequency and technique should remain on Industrial Emissions License W0185-02.**

It is also felt that the proposed change to condition 5 (add Condition 5.18) requirements would further strengthen the conditions and monitoring in relation to ash waste emissions and monitoring.

The HSE have no further concerns at this time regarding the application for a review of the Industrial Emissions License Reg No. W0185-02.

Yours sincerely,



Fiona Byrne
Senior Environmental Health Officer