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TIMONEY
& COMPANY**

CONSULTANTS IN ENGINEERING & ENVIRONMENTAL SCIENCES

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
10 AUG 2004
INITIALS: _____
Our Ref: Q:\2004\238\01\Let001\AM

Administration
Waste Management Licensing
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford

EPA

IPC ENFORCEMENT WEXFORD.

Main File _____
Public File _____
Evaluation File _____
Date: 10/8/04 *BD*
For Assessment by Inspector _____

Environmental Protection Agency
Office of Environmental Enforcement
Received 10 AUG 2004
Initials: _____

6 August 2004

RE: Proposed alterations to Waste Licence Reg. No. 145-1

Dear Sirs

Waste Licence Reg. No. 145-1 was issued by the Environmental Protection Agency on 26th February 2002. The licence is for the management of hazardous waste for the following classes:

Class 7: Physico-chemical treatment not referred to elsewhere in this Schedule (including evaporation, drying and calcination) which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 10 of this Schedule.

Class 7 is the principal activity and refers to the heat disinfection of the following types of healthcare waste at the facility:

- (a) used sharp instruments
 - (b) infected or potentially hazardous health care risk waste
 - (c) autoclaved laboratory waste, and
 - (d) potentially offensive material as outlined in the waste licence application.
- The process is to treat the above healthcare waste to produce disinfected solid waste suitable for landfill.

Class 12: Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.

This activity is limited to the repackaging of unprocessed or processed healthcare waste types listed under Class 7 above.

Continued
Environmental Protection Agency
13 AUG 2004

CORE HOUSE POULADUFF ROAD CORK IRELAND

TEL: +353 21 4964133 FAX: +353 21 4964464 E.MAIL: info@fco.ie Web Site: www.fehilytimoney.ie

Director: E. Timoney, B. Egan, F. Egan, M. Egan, P. Egan, E. Egan, D. O'Sullivan, B. Egan, M. Egan, C. O'Sullivan, B. Egan, F. Egan, P. Egan, W. Egan, P. Egan
Company Secretary: A. Keoghane, Associate: D. Egan, B. Egan, M. Egan, P. Egan, E. Egan, D. O'Sullivan, B. Egan, M. Egan, C. O'Sullivan, B. Egan, F. Egan, P. Egan, W. Egan, P. Egan





Class 13: Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned was produced.

This activity is limited to the storage of unprocessed or processed healthcare waste types listed under Class 7 above.

The licensee is Gleneden Trading Ltd., Unit 9 Raffeen Industrial Estate, Raffeen, Monkstown, Co. Cork. The facility is for the treatment holding and transfer of healthcare waste. In Ireland, healthcare waste is, for the most part, controlled by what is known as the National Contract, currently held by STI. The licensee established the facility at Raffeen on the understanding that STI would sub-contract a proportion of the National Contract to Gleneden. In the event, that understanding was misplaced and no healthcare waste has been processed at Raffeen.

Atlas has expressed an interest in the facility. In general terms, Atlas proposes to partner with Gleneden to hold, bulk-up and operate the facility as a transfer station for a range of hazardous wastes (including waste oil for recovery) at the facility. Gleneden would remain the licensee.

The waste management activities that will be applied for include the existing Classes 7, 12 and 13 of Schedule 3 and, in addition to the existing licensed activities, Class 12 and 13 of Schedule 4. The following is a typical list of waste that will be accepted following modification of the licence:

Hazardous waste comprising:

- a. Waste oils/hydrocarbons (including interceptor wastes & tank bottoms) delivered by Atlas or other permitted contractors (5,000 t)
- b. Used oil filters oily rags and other solid oily wastes (1,000 t)
- c. Paint and adhesive wastes (2,000 t);
- d. Waste cooking oil (3,000 t)
- e. Infectious healthcare waste (as per the present licence)
- f. Healthcare waste from dental surgeries (50 t)
- g. Category A clinical waste (300 tonnes)
- h. Drummed solvents/flammable liquids (drums would not be processed or emptied, drums would be held until a commercial quantity has accrued for forwarding) (2,000 t)
- i. Fluorescent Tubes for bulking and transfer (50 t)
- j. Batteries for bulking and transfer (non-mercury containing 250 t)
- k. Other hazardous wastes as agreed with the Agency

Initially the only "process" will be the bulking up of waste oils/hydrocarbons prior to dispatch (mainly for recovery). This would occur whereby tankers of oily liquids would be offloaded into fixed bulk tanks for subsequent loading into articulated tankers and onward transport. The processing of healthcare waste as prescribed by the current licence would be suspended and re-commenced only by agreement of the Agency.

The proposed annual throughput is estimated at 15,000 t, with up to 150 t of waste oil (in bulk tanks) and up to 150 t of other hazardous wastes (drums/IBCs etc.) being bulk-stored at any time.

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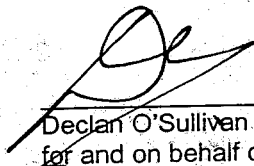
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The facility would be utilised as a transfer station with the wastes being forwarded on to other licensed Atlas facilities (Portlaoise & Shannon) or to other appropriately licensed facilities (including TFS to other European countries) subject to approval with the Agency.

Our understanding is that the Agency will prescribe the information to be submitted in support of the waste licence review application. This letter comprises a formal request that the Agency stipulates the information to be contained in the review application.

Fehily Timoney & Company is advising both parties.

Yours faithfully



Declan O'Sullivan

for and on behalf of **Fehily Timoney & Company**

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