



Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

Director of Environment and Water Services
South Dublin County Council
Environmental Services Department, County Hall
Town Centre
Tallaght, Dublin 24

Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire

T: +353 53 916 0600
F: +353 53 916 0699
E: info@epa.ie
W: www.epa.ie

LoCall: 1890 33 55 99

27 June 2007

Reg No: W0192-02

Dear Sir/Madam

I am to advise you that the Agency has received an application for a Waste Licence from Rilta Environmental Ltd (formerly known as SITA Environmental Ltd), for a facility located at Rilta Environmental Ltd, Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, County Dublin.

The applicant proposes, as part of this application, to provide for the discharge of process effluent to a sewer, which the applicant has stated is vested in, or controlled by, your Council. Process effluent includes trade effluent or other matter (other than domestic sewage or storm water). I enclose copy extracts from the application form, which detail proposed discharges.

The provisions of Section 52 of the Waste Management Acts, 1996 to 2005, provides that the Agency shall obtain the consent of the sanitary authority to the proposed discharge from an activity which involves the discharge of trade effluent or other matter (other than domestic sewage or storm water), to a sewer vested in or controlled by a sanitary authority.

In order to expedite the Agency's consideration of this waste licence application, I am to request your authority's consent to the proposed discharge/s. It should be noted that, your authority's consent may be subject to such conditions as your authority considers appropriate as provided for in Section 52 of the Waste Management Acts, 1996 to 2005 and Section 99E(3) of the Environmental Protection Agency Acts, 1992 and 2003. Your attention is drawn to paragraphs (3) and (4) of the attached copy of the relevant section of the Act. For your convenience please find attached a reply form including a list of draft conditions compiled by the Agency.



In accordance with paragraph (2) of this section of the Act, you are requested to forward your response within 5 weeks of the date of this letter. Please note that any decision given after the expiry period shall be invalid and in those circumstances the Agency may proceed to determine the application concerned as if consent was obtained. Aoife Loughnane is dealing with this matter and can be contacted at the Licensing Unit, Office of Climate Change, Licensing & Resource Use, EPA Regional Inspectorate Dublin, McCumiskey House, Richview, Clonskeagh Road, Dublin 14 (Tel. No. 01-268 0100), if you have any queries.

Your co-operation in this matter is appreciated.

Yours sincerely,



Ewa Babiarczyk
Programme Officer
Licensing Unit
Office of Climate Change, Licensing & Resource Use

Section 99E (3) & (4) of the Environmental Protection Agency Acts, 1992 and 2003

- (3) Subject to subsection (4), a consent under subsection (1) may be granted subject to or without conditions and if it is granted subject to conditions the Agency shall include in the licence or revised licence concerned conditions corresponding to them or, as the Agency may think appropriate, conditions more strict than them.
- (4) The conditions that may be attached to a consent by a sanitary authority under this section are the following and no other conditions, namely conditions-
- (a) relating to-
 - (i) the nature, composition, temperature, volume, level, rate, and location of the discharge concerned and the period during which the discharge may, or may not, be made,
 - (ii) the provision, operation, maintenance and supervision of meters, gauges, manholes, inspection chambers and other apparatus and other means for monitoring the nature, extent and effect of emissions,
 - (iii) the taking and analysis of samples, the keeping of records and furnishing of information to the sanitary authority,
 - (b) providing for the payment by the licensee to the sanitary authority concerned of such amount or amounts as may be determined by the sanitary authority having regard to the expenditure incurred or to be incurred by it in monitoring, treating and disposing of discharges of trade effluent, sewage effluent and other matter to sewers in its functional area or a specified part of its functional area,
 - (c) specifying a date not later than which any conditions attached under this section shall be complied with,
 - (d) relating to, providing for or specifying such other matter as may be prescribed.

SANITARY AUTHORITY RESPONSE
re: SECTION 52 OF THE WASTE MANAGEMENT ACTS, 1996 to 2005

Name & Address of Sanitary Authority: South Dublin County Council, Environmental Services
 Department, County Hall, Town Centre, Tallaght,
 Dublin 24.

Waste Reg. No. W0192-02

Waste Facility: Rilta Environmental Ltd, Block 402, Grant's Drive,
 Greenogue Business Park, Rathcoole, County Dublin

Waste Licence Applicant: Rilta Environmental Ltd (formerly known as SITA
 Environmental Ltd)

Consent: Indicate Yes to one of the following statements:

Consent granted subject to the consent conditions outlined below	
Consent granted without conditions	
Consent refused ^{Note 1}	

Note 1 Where it is proposed to refuse permission the reasons for the refusal should be clearly outlined in the response.

GENERAL CONSENT CONDITIONS	Condition to be included (Yes/No)
1. No specified emission from the installation shall exceed the emission limit value set out in <i>Schedule B: Emissions Limits to Sewer</i> . There shall be no other emission to sewer of environmental significance.	
2. The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as out in <i>Schedule C</i> .	
3. Monitoring and analytical equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge or emission.	
4. The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus installed, in connection with the process effluent, and to take samples of the process effluent.	
5. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity is being carried on unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternative sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.	
6. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.	
7. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and to off-site points as required by the Agency.	
8. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid, alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer.	
9. In the event of any incident which relates to discharges to sewer, having taken place, the licensee shall notify the Agency, Local Authority and Sanitary Authority as soon as practicable after the incident.	

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Waste Licence application Register No. W0192-02

Emission Point Reference No: _____

Parameter <i>(delete parameters which are not applicable)</i>	Monitoring Frequency <i>(e.g. monthly, quarterly, annually)</i>	Sampling Type <i>(grab, composite)</i>
Flow to sewer		
Temperature		
pH		
BOD		
COD		
Suspended Solids		
ADDITIONAL PARAMETERS		
<i>(if required)</i>		

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of process effluent (per s52 of the Waste Management Acts, 1996 to 2005)	
Payment Frequency	
Annual Monitoring Costs	

Signed on behalf of South Dublin County Council

_____ Date _____

SECTION E EMISSIONS

Give particulars of the source, location, nature, composition, quantity, level and rate of emissions arising from the activity and, where relevant, the period or periods during which such emissions are made or are to be made.

The applicant should address in particular any emission point where the substances listed in the Schedule of S.I. 394 of 2004 are emitted.

E.1 Emissions to Atmosphere

See Tables in Section E of Annex 1.

E.2 Emissions to Surface Waters

Attachment E.2 Tables E.2(i) and E.2(ii) should be completed where relevant.

E.3 Emissions to Sewer

Attachment E.3 Tables E.3(i) and E.3(ii) should be completed, where relevant.

As part of this licence review we are seeking to increase the current limits set for parameters BOD and COD as conditioned in Waste Licence 192-1. The limits set in Waste Licence 192-1 were based on the limits of a former RILTA operation and are not relevant to the current operations at the facility in Greenogue.

The current limit for BOD in wastewater from the sewer is 1000mg/l for a grab sample (mg/l). This review proposes that this limit is increased to 3000mg/l similar to Waste Licence 185-1, also in Greenogue Business Park.

The current limit for COD in wastewater from the sewer is 3000mg/l for a grab sample (mg/l). This review proposes that this limit is increased to 6000mg/l similar to Waste Licence 185-1, also in Greenogue Business Park.

E.4 Emissions to Groundwater

Describe the existing or proposed arrangements necessary to give effect to Articles 3,4,5,6, and 7 of Council Directive 80/68/EEC of 17 December 1979 on the protection of groundwater against pollution by certain dangerous substances.

Table E.4(i) should be completed, as relevant, for each source. There are no emissions to groundwater at RILTA Environmental Ltd., Greenogue.

E.5 Noise Emissions

Give particulars of the source, location, nature, level, and the period or periods during which the noise emissions are made or are to be made.

Table E.5(i) should be completed, as relevant, for each source.



WASTE Application Form

TABLE E.3(i): EMISSIONS TO SEWER(One page for each emission)

Emission Point:

Emission Point Ref. N ^o :	EFF
Location of connection to sewer :	Adjacent to the Hydrocarbon Treatment Centre
Grid Ref. (10 digit, 5E,5N):	E301655 N228530
Name of sewage undertaker:	South Dublin County Council/ Ringsend WWTP

Emission Details:

(i) Volume to be emitted			
Normal/day	75m ³	Maximum/day	200m ³
Maximum rate/hour	20m ³		

(ii) Period or periods during which emissions are made, or are to be made, including daily or seasonal variations (*start-up /shutdown to be included*):

Periods of Emission (avg)	_____ 60 _____ min/hr _____ 6 _____ hr/day _____ 245day/yr
---------------------------	---



WASTE Application Form

TABLE E.3(ii): EMISSIONS TO SEWER - Characteristics of the emission (1 table per emission point)

Emission point reference number : EFF

Please Note: Current Information re: limits for the parameters listed below are included in Waste Licence 192-1, Schedule C.5. Details regarding a review of these limits are included in Section E.3. above.

Parameter	Prior to treatment				As discharged				% Efficiency
	Max. hourly average (mg/l)	Max. daily average (mg/l)	kg/day	kg/year	Max. hourly average (mg/l)	Max. daily average (mg/l)	kg/day	kg/year	
<u>BOD</u>					2000	1000	160	40000	
<u>COD</u>					5000	3000	480	120000	
<u>Mineral Oils</u>					20	10	0.15	36	
<u>Suspended Solids</u>					1000	500	7.5	550	
<u>Sulphates</u>					2000	1000	37	9000	
<u>Detergents</u>					200	100	4	1000	
<u>Temperature</u>					2	1	0.05	12.5	
<u>Toluene</u>					2	1	0.05	12.5	
<u>O/m/p Xylenes</u>					10	5	0.25	62.5	
<u>Copper</u>					10	5	0.25	62.5	
<u>Zinc</u>									

Mr Tim O'Shea
South Dublin C.C.
Deansrath House
New Nangor Road
Clondalkin
Dublin 22

March 26th 2007,

Re: Rilta Environmental Ltd. Waste Licence W0192-01

Dear Tim,

Subsequent to our telephone conversation in February, I am writing to seek approval for a change to our Waste Licence. Our Licence may be viewed using the reference above at www.epa.ie.

To give you perspective, as part of our licensed site activities, we operate a waste water treatment system which uses both physical and chemical treatments. The types of wastes we accept include garage interceptors, waste oils, waste coolants and machining emulsions etc. Our final effluent product is tested for a number of parameters, two of those being C.O.D. and B.O.D. These are sampled on a grab sample basis and results have exceeded our current limits on a small number of occasions. It was suggested by the EPA that an increase in 'grab sample' limits would be preferable to putting in a biological treatment system (a potential odour source) as long as we did not breach the Licence 'daily mean loading' limits.

To put this in context, I include a table below with data taken from our Annual Environmental Report for 2006:

Total effluent sent to foul sewer: 17,990m³ over 243 days.

	Grab Sample	Grab Sample	Daily Mean Load	Daily Mean Load
	Limit (mg/l)	Average 2006 (mg/l)	Limit (Kg)	Average 2006 (mg/l)
B.O.D.	1,000	735	160	54.39
C.O.D.	3,000	1492	480	111.41

As you can see, our data shows we are operating significantly below the daily mean loading limit and we would not see this figure increasing significantly as the total effluent released last year rose significantly but we would not envisage a similar increase this year or for the foreseeable future.

After reviewing similar Licences in the area, we would suggest revising the grab sample limits up to similar levels i.e. B.O.D. 3,000mg/l and C.O.D. 6,000mg/l. These, we feel would be more suitable to the waste types we accept here for treatment. We intend to apply for a review of our current Licence in the near future and would hope to put in the changes to effluent limits as part of the review.

If you wish to contact me for further information, you can reach me at 087 9176264. I look forward to hearing from you.

Yours sincerely,

Colm Hussey
