

Mr Colm Hussey
Rilta Environmental Limited
Block 402, Grant's Drive
Greenogue Business Park
Rathcoole
County Dublin

Regional Inspectorate
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9th August 2007

re: **Waste Licence Review Application W0192-02 in respect of a facility at Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, County Dublin.**

Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations 2004 (S.I. No. 395 of 2004)

Dear Mr Hussey,

I am to refer to the above referenced application for a waste licence review relating to your facility at Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, County Dublin. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 and Article 13 of the Waste Management (Licensing) Regulations.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed below:

ARTICLE 12 COMPLIANCE REQUIREMENTS

1. In Section B.7.1 of the application form, you have applied for the addition of Class 5 of the Fourth Schedule of the Waste Management Acts 1996 to 2005; *Regeneration of Acids or Bases*. Please provide the following information:
 - (i) Clarify whether this relates to a new or existing waste activity at the facility;
 - (ii) Describe the exact nature of the waste activity in question; and
 - (iii) Confirm the relevant waste quantity applicable to this class of activity.
2. Submit a copy of the notice issued to the Planning Authority to fulfil the requirements of Article 9 of the Regulations. The notice shall contain the information specified in Article 6 of the Regulations.
3. Provide an update on the status of planning application register reference SD07A/0260 and submit a copy of the planning permission, if granted.

4. Provide details of the current and proposed annual solvent usage at the facility and the types of solvent used in spray painting & cleaning activities on site. Assess the installation's requirements under the Emissions of Volatile Organic Compounds from Organic Solvents Regulations (S.I. No. 543 of 2002).
5. Emissions to Atmosphere
 - (i) For emission points A1, A2 & A3, provide the following information:
 - a) Clarify the maximum volumetric emission rates (m^3/hr & m^3/d) given in *Table E.1(ii) Main Emissions to Atmosphere*. Note that the hourly and daily volumes given for emission point A2 do not correspond; and
 - b) Clarify the chemical characteristics of the emissions given in *Table E.1(iii) Main Emissions to Atmosphere*. Note that the current licensed parameters are T.A. Luft Organics Class I and Total Organic Carbon (as C).
 - (ii) Referring to the requested increase in volumetric emissions to atmosphere at emission points A1, A2 & A3, provide an impact assessment, using air dispersion modelling as necessary, of the maximum predicted organic solvent emissions to atmosphere from the facility. Where air dispersion modelling is used, please supply in electronic format (.dat format files), copies of the complete input, output and meteorological data used in the modelling assessment.
6. State the proposed quantity of leachate/liquid waste generated at the contaminated soil storage area and describe the arrangements for handling, treatment & disposal of such waste.
7. Provide an update on the current status of the following specified engineering works identified in Waste Licence Reg. No. W0192-01:
 - (i) Installation of drainage network including silt traps and oil interceptors;
 - (ii) Installation of secondary containment system with leak detection to underground settlement tanks;
 - (iii) Installation of decant room at Hazardous Waste Transfer Station; and
 - (iv) Installation of photographic waste treatment unit at Hazardous Waste Transfer Station.
8. Provide proposals for the control of odour and dust emissions in light of the proposed increase in waste tonnage from 62,500 to 111,000 tonnes per annum.
9. Submit the appropriate fee for the review of your waste licence in accordance with Article 41 of the Waste Management (Licensing) Regulations 2004. Note that two fees are required if disposal and recovery are to occur. The Agency notes that you have provided a fee of €6,000. Note that your application is not valid until the full fee is received by the Agency. Under the Second Schedule of the Regulations, the relevant fees are as follows:

Waste Activity	Amount of fee for a review of a waste licence
2. The disposal of hazardous waste	€22,500
4. The recovery of waste	€6,000
Fee Payable	€28,500 ^{Note 1}

Note 1: The applicant may apply for a refund or waiver in respect of the fee payable. The Agency shall have absolute discretion to refund or waive up to 50% of the fee payable, as provided under Article 45(1) of the Waste Management (Licensing) Regulations 2004, where the Agency is satisfied that the payment in full of the fee would not be just and reasonable having regard to the relevant circumstances of the activity.

ARTICLE 13 COMPLIANCE REQUIREMENTS

Section 8 of the EIS does not adequately assess the impact of the requested increases in emissions to atmosphere from the facility. Please provide the following information (see Question 5 above):


- a) For emission points A1, A2 & A3, clarify the maximum volumetric emission rates (m^3/hr & m^3/d) and the chemical characteristics of the emissions, and
- b) Provide an impact assessment, using air dispersion modelling as necessary, of the maximum predicted organic solvent emissions to atmosphere from the facility. Where air dispersion modelling is used, please supply in electronic format (.dat format files), copies of the complete input, output and meteorological data used in the modelling assessment.

Your reply to this notice should include a revised non-technical summary (Application Form and EIS), which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

Please supply the additional information in the form of a one original, two copies in hardcopy format plus two copies of all files in electronic searchable PDF format on CR-ROM within **four weeks of the date of this notice**. For the additional EIS information, please supply one original, two copies in hardcopy format plus sixteen copies in electronic searchable PDF format on CD-ROM. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is **W0192-02**. Please direct all correspondence in relation to this matter to *Ann Kehoe, Licensing Unit, Office of Climate Change, Licensing & Resource Use, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Aoife Loughnane

Inspector
Office of Climate Change, Licensing & Resource Use