



Administration, Environmental Licensing Programme
Office of Climate, Licensing & Resource Use
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford

Environmental Protection
Agency

11 FEB 2008

06 February 2008

RE: Proposed Decision of Licence W0192-02 Granted to Rilta Environmental Ltd.

Dear Ms. Sir/Madam,

Rilta Environmental Ltd. of 402 Greenogue Business Park, Rathcoole, in accordance with Section 42(3) of the Waste Management Acts 1996-2007, wishes to object to the Proposed Decision to grant Waste Licence W0192-02 as it currently stands. The grounds for objection relate to Schedule A.1, Waste Activities (Limitations), but we will note a number of points also, regarding the content of the proposed decision, for completeness.

Schedule A: Limitations (A.1 Waste Activities)

In Part I of the Schedule of Activities Licensed, Rilta Environmental Ltd. applied for, among others, Class 7 of the Third Schedule – Physico-Chemical Treatment. However, the Limitations on Waste Activities (A.1) would suggest the Waste Treatment Plant at Greenogue would be confined to '*physical and chemical treatment of hydrocarbon contaminated wastes*'. Rilta has historically accepted many other waste streams other than those with hydrocarbon contamination. Indeed a complete list currently treated waste is detailed in Section H, Attachment H1 of our Licence Review Application. All wastes detailed with the disposal code 'D9-Physical and Chemical Treatment' pertain to those currently treated in the waste treatment plant. Rilta Environmental would propose using the term 'aqueous waste' in place of 'hydrocarbon contaminated waste. It would be accepted that this is a very minor change, but Licensee would suggest the change to avoid any confusion in the future.



Notes for the Agency's consideration

- In **Section 2.4.2** of the EIS, the working hours stated are 07:30 – 1800 Mon to Fri. In the Licence, the waste acceptance hours are stated at 08:00 – 17:30. Rilta Environmental would propose having the waste acceptance hours the same as the operation hours. Specifically, accepting waste at 07:30 would avoid a build up of waste vehicles, which has become the norm as companies try to avoid rush hour traffic.
- Similar to the main objection point, **Sections 6.21 and 6.22** of the P.D. refer to the processing of 'hydrocarbon waste'. While the term may have been drawn from the EIS, Rilta Environmental would suggest using the term 'aqueous waste' in its place.
- In **Section 8.11** of the P.D., Condition 8.5.1 is referred to which does not exist. It is assumed that 8.11.1 is what was intended.
- In **Schedule A2-Table A.2**, '16 07 08 Wastes containing oil', could suggest that we could only accept the indicated weight of wastes containing oil. While the EWC Code is understood, Rilta Environmental would propose renaming the waste '16 07 08 Tank cleaning wastes containing oil'
- In **Section 6.25.2**, measures for odour and dust control are detailed. With regard to dust (**Section 6.25.2.1**), the Licensee does not have any dust issues and, along with the on-site street sweeper, would suggest that dust curtains would not be required on site.

While the Licensee would compliment the Agency on a very progressive Proposed Decision, it was felt that any outstanding issues, however seemingly insignificant, should be clarified before a Final Decision was reached.

Yours sincerely,

Colm Hussey
Rilta Environmental Ltd.