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This Report has been cleared  
for submission to the Board by  
the Programme Manager P. Nolan  
Signed: N. Kearey Date: 30/4/08

**LICENSING &  
RESOURCE USE**

**REPORT OF THE TECHNICAL COMMITTEE ON  
OBJECTIONS TO LICENCE CONDITIONS**

<b>TO:</b>	Directors
<b>FROM:</b>	Technical Committee - <b>ENVIRONMENTAL LICENSING PROGRAMME</b>
<b>DATE:</b>	29 <sup>th</sup> April 2008
<b>RE:</b>	Objection to Proposed Decision for <b>RILTA ENVIRONMENTAL LIMITED</b> , Waste Reg.: W0192-02.

<b>Application Details</b>	
Type of facility:	Integrated Waste Management Facility
Classes of activity (P = principal activity):	3 <sup>rd</sup> Schedule: Classes 7, 11, 12 & 13 4 <sup>th</sup> Schedule: Classes 2, 3, 4, 6, 8 & 13 (P)
Location of activity:	Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, Co. Dublin.
Licence Review application received:	07/06/2007
PD issued:	18/01/2008
First party objection received:	11/02/2008
Third Party Objection received	None received
Submissions on Objections received:	None received

**Company**

Rilta Environmental Limited operates a hazardous waste facility at Greenogue Business Park, Rathcoole, Co. Dublin. The current licence, Reg. No. W0192-01, was granted on 3<sup>rd</sup> December 2004. The company requested a licence review in order to accommodate an increase in annual waste throughput from 65,000tpa (tonnes per annum) to 111,000tpa, and increases in limit values for emissions to atmosphere and for discharges to sewer from the facility. The waste streams accepted include: contaminated soil, acidic and alkali wastes, flammable wastes, laboratory chemicals, photographic wastes and environmentally hazardous wastes. The main increase in tonnage is requested for hazardous waste (57,500tpa increasing to 106,000tpa) to facilitate acceptance of additional volumes of contaminated soil. Contaminated soil is accepted for storage prior to movement off-site for export and no processing takes place on-site.

## Consideration of the Objection

The Technical Committee, comprising of Marian Doyle (Chairperson), and Ciara Maxwell has considered all of the issues raised in the objection. This report details the Committee's comments and recommendations following the examination of the objection together with discussions with the licensing inspector Aoife Loughnane and Office of Environmental Enforcement inspector for the site, Donal Howley, who also provided comments on the points raised. The Technical Committee consulted Agency Inspector Jonathan Derham (Expert for waste activities).

This report considers one first party objection; no third party objections were received.

## First Party Objection

The licensee has objected to the Proposed Decision, stating that the grounds of the objection relate to Schedule A: Limitations (A.1 Waste Activities). The licensee also notes a number of points regarding the content of the Proposed Decision, under the heading "Notes for the Agency's consideration". The issues are dealt with hereunder and are in the order of appearance in the objection.

### 1. Schedule A: Limitations (A.1 Waste Activities)

*The licensee objects to Schedule A.1 Wastes Activities. The licensee objects to the limitation of "Physical and chemical treatment of hydrocarbon contaminated wastes", stating that the facility has historically accepted many other waste streams other than those with hydrocarbon contamination. The licensee refers to a complete list of wastes currently treated in Section H, Attachment H1 of the licence review application and that all wastes with the disposal code 'D9-Physical and Chemical Treatment' pertain to those wastes currently treated in the waste treatment plant. The licensee suggests using the term 'aqueous waste' as a replacement for 'hydrocarbon contaminated wastes'.*

#### Technical Committee's Evaluation:

Schedule A.1. Wastes Activities authorises the waste-related processes that may be undertaken that may be undertaken under the terms of the licence. The Technical Committee notes that according to the Inspector's report there will be no change to waste activities at the Hydrocarbon Waste Treatment Centre (i.e. the waste treatment plant) as a result of the licence review. Also in Section H, Attachment H1 of the licence review application, wastes other than hydrocarbon contaminated wastes have been accepted at the facility. The licensee's objection is accepted.

**Recommendation:** In Schedule A, replace *A.1: Waste Activities* with the following:

#### ***A.1 Waste Activities***

The following waste related processes are authorised:

- i. Recycling and reconditioning of industrial packaging (steel drums, plastic drums & IBCs);
- ii. Physical and chemical treatment of **aqueous** wastes;
- iii. Filtering and dewatering of waste oil;
- iv. Shredding, crushing, baling, repackaging processes;
- v. Packaging, handling, bulking, sizing, storage and transfer of waste.

No additions to these processes are permitted unless agreed in advance with the Agency.

## 2. Condition 1.8 Waste Acceptance Hours and Hours of Operation

*The licensee objects to waste acceptance being limited to between the hours of 08:00 and 17:30. The licensee refers to the hours of operation detailed in Section 2.4.2 of the EIS and proposes that the waste acceptance hours be the same as the operation hours, i.e. 07:30 to 18:00. The licensee notes that accepting waste at 07:30 hrs would avoid a build up of waste vehicles as companies try to avoid rush hour traffic.*

### Technical Committee's Evaluation:

The Inspector's report notes that the operating hours specified in the planning permission for the facility were to be included in Condition 1.8. These are between the hours of 7.30am and 6.00pm Monday to Friday inclusive, and 7.30am and 2.00pm on Saturdays. Licence Reg. No. W0192-01 does not contain any limitations on hours.

The facility is located in an Industrial Estate. It is bounded to the north by the River Griffeen, to the east and west by industrial units and to the south by Grant's Drive. Also the facility has a satisfactory compliance record in relation to noise.

The licensee has proposed that the waste acceptance hours be the same as the operation hours. A restriction on waste acceptance is considered necessary to deal with waste accepted late at the facility. This allows a 30-minute clean up time for waste accepted at 5.30pm Monday to Friday or at 1.30pm on Saturday. Therefore no change to these hours is recommended.

In the objection the licensee specifically refers to the morning hours and avoiding a build up of waste vehicles. This point is accepted and Condition 1.8.1 shall be amended to allow waste acceptance from 7.30am Monday to Saturday. The TC also notes two minor grammatical errors in Condition 1.8 and recommends that these be rectified as detailed below.

**Recommendation:** Replace *Condition 1.8* with the following:

### 1.8 Waste Acceptance Hours and Hours of Operation

- 1.8.1 With the exception of emergencies or as may be agreed by the Agency, waste shall be accepted at or dispatched from the facility only between the hours of 7.30am and 5.30pm Monday to Friday inclusive, and 7.30am and 1.30pm on Saturdays.
- 1.8.2 The facility shall be operated only between the hours of 7.30am and 6.00pm Monday to Friday inclusive, and 7.30am and 2.00pm on Saturdays.
- 1.8.3 The facility shall not operate or accept/dispatch waste on Sundays or on Public Holidays without the agreement of the Agency.

## 3. Condition 6.21 Processing of Hydrocarbon Waste

*The licensee objects to the reference to 'hydrocarbon waste' in Sections 6.21 and 6.22, similar to the main objection point. The licensee acknowledges that this term may have been drawn from the EIS but suggests that the term 'hydrocarbon waste' be replaced by 'aqueous waste'.*

### Technical Committee's Evaluation:

In the First Party Objection the licensee deals with Sections 6.21 and 6.22 (Condition 6.21 and Condition 6.22) in the same bullet point, however responded to separately.

Condition 6.21 refers to processing of hydrocarbon waste. As discussed under point 1, the Technical Committee recommends that the reference to 'hydrocarbon waste' be replaced by the term 'aqueous waste' to accommodate the range of wastes processed at the Hydrocarbon Waste Treatment Centre.

**Recommendation:** Replace *Condition 6.21* with the following:

**6.21 Processing of Aqueous Waste**

- 6.21.1 The processing of **aqueous** waste at the Hydrocarbon Waste Treatment Centre shall be carried out as described in Section 2.3.2 *Hydrocarbon Waste Treatment Centre* of the EIS submitted with the application, unless otherwise agreed by the Agency.
- 6.21.2 The heating of waste oils shall be carried out at the appropriate temperature so as to avoid their combustion. A safety cutoff temperature detection unit shall be installed on the oil heating tanks and calibrated annually. A calibration certification shall be submitted as part of the AER.

#### **4. Condition 6.22 Wastewater Management**

*The licensee objects to the reference to the processing of 'hydrocarbon waste'.*

Technical Committee's Evaluation: The processing of hydrocarbon waste is not specifically referred to in Condition 6.22. The Condition refers only to the Hydrocarbon Waste Treatment Centre. Therefore the Technical Committee considers that no change is required.

**Recommendation:** No change

#### **5. Condition 8.11 Waste Repackaging**

*The licensee points to 'Section 8.11 of the P.D' where reference is made to Condition 8.5.1, which does not exist. The licensee assumes that 8.11.1 is what was intended, rather than 8.5.1.*

Technical Committee's Evaluation: The Technical Committee acknowledges that this is a clerical error. Condition 8.11.2 should refer to Condition 8.11.1 and not to Condition 8.5.1.

**Recommendation:** Replace *Condition 8.11.2* with the following:

- 8.11.2 All operations involving the transfer of contents referred to in Condition **8.11.1** shall take place indoors, protected against spillage, in a designated area to be agreed with the Agency. Appropriate control measures shall be put in place to minimise any emissions which may arise from such activity.

## 6. Schedule A, Table A.2 Waste Categories and Quantities

The licensee wishes to clarify the description of wastes under EWC Code '16 07 08 Wastes containing oil' as it considers that the description could suggest that the facility could only accept the indicated weight of wastes containing oil. The licensee has proposed renaming the waste as '16 07 08 Tank cleaning wastes containing oil'.

Technical Committee's Evaluation: The Technical Committee notes that the EWC Chapter heading 16 07 covers "wastes from transport tank, storage tank and barrel cleaning". The EWC Code 16 07 08 is a sub-category of that heading. The Technical Committee considers that the EWC Code 16 07 08 adequately describes the wastes authorised and recommends no change.

**Recommendation:** No change

## 7. Condition 6.25.2

The licensee objects to the requirement to maintain dust curtains on entry and exit points from the waste facility buildings. The licensee maintains that the site does not have any dust issues and, suggests that dust curtains would not be required along with the on-site street sweeper.

Technical Committee's Evaluation: The Technical Committee notes that the requirement for maintenance of dust curtains on entry/exit points from the waste facility buildings is included in the current licence, Reg. No. W0192-01. The Inspector's report refers to dust level exceedances in the past. These are documented in an Office of Environmental Enforcement Site Inspection report (06SI03dh) and relate to the results of dust monitoring carried out in the period March to May 2005. The Technical Committee recommends that Condition 6.25.2 be re-worded to enable agreement of equivalent measures as approved by the Agency.

**Recommendation:** Replace *Condition 6.25* with the following:

### 6.25 Dust & Odour Control

- 6.25.1 In dry weather, site roads and any other areas used by vehicles shall be sprayed with water as and when required to minimise airborne dust nuisance.
- 6.25.2 The licensee shall install and provide adequate measures for the control of odours and dust emissions, including fugitive dust emissions, from the facility. Such measures shall at a minimum include the following:-
  - 6.25.2.1 Dust curtains (**or equivalent as approved by the Agency**) shall be maintained on the entry/exit points from the waste facility buildings. All other doors in **these** buildings shall be kept closed where possible.
  - 6.25.2.2 Installation of an odour management system.
- 6.25.3 Provision of 100% duty capacity and 50% stand by capacity, back ups and spares must be provided for the air handling, ventilation and abatement plant.

## Overall Recommendation

It is recommended that the Board of the Agency grant a licence to the licensee

- (i) for the reasons outlined in the Proposed Decision and
- (ii) subject to the conditions and reasons for same in the Proposed Decision,  
and
- (iii) subject to the amendments proposed in this report.

Signed,

pp DoREEN Kearey

Marian Doyle

for and on behalf of the Technical Committee