

# RILTA ENVIRONMENTAL LTD. WASTE LICENCE REVIEW (192-1) Response to Further Information

## **CLIENT:**

**RILTA Environmental Ltd.**

Grants Drive, Greenogue Business Park, Dublin 15.

## **PROJECT:**

Review of Waste Licence 192-1 for the Environmental Protection Agency

Request for Further Information

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**TOBIN Consulting Engineers**

**Block 10-3, Blanchardstown Corporate Park, Blanchardstown, Dublin 15**

[www.tobin.ie](http://www.tobin.ie)

## Document Amendment Record

**Client:** RILTA Environmental Ltd.

**Project:** Review of Waste Licence 192-1 for the Environmental Protection Agency

**Title:** Response to a Request for Further Information

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## ARTICLE 12 COMPLIANCE REQUIREMENTS

### ITEM 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.**

#### **Response:**

The classification of activities at the RILTA Environmental Ltd. site has been clarified and Class 5 of the Fourth Schedule of the Waste Management Acts 1996 to 2005; *Regeneration of Acids or Bases* has been removed from the operational classification. Therefore, Item 1 above no longer applies to the Waste Licence Review Application.

### ITEM 2

**Submit a copy of the notice issued to the Planning Authority to fulfill the requirements of Article 9 of the Regulations. The notice shall contain the information specified in Article 6 of the Regulations.**

#### **Response:**

A copy of the Planning Application and Site Notice as issued to South Dublin County Council is included in Appendix 1.

### ITEM 3

**Provide an update on the status of planning application register reference SD07A/0260 and submit a copy of the planning permission, if granted.**

#### **Response:**

A copy of the final Grant of Permission from South Dublin County Council is included in Appendix 2 -Planning Reference SD07A/0260.

### ITEM 4

**Provide details of the current and proposed annual solvent usage at the facility and the types of solvent used in spray painting and 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).**

**Response:**

There are only two uses of solvents on site and these are both in the Drum Division. Solvent-based paint and Xylene are both used in the reconditioning of waste drums. The volumes of solvent usage for 2006 were assessed and are as follows:

|                    | <b>Vol. Used (litres)</b> | <b>Total VOC (Kg)</b> |
|--------------------|---------------------------|-----------------------|
| <b>Spray Paint</b> | 3300                      | 1274                  |
| <b>Xylene</b>      | 700                       | 609                   |

This gives an overall VOC usage of 1883Kg, well below the threshold for spray painting under the SI No. 503 of 2002 regulations. The current installations on site can adequately deal with such concentrations of VOC. It is not intended that there will be any large rise in the amount of spray painting in the near future.

**ITEM 5**

**(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 1 and Total Organic Carbon (as C).**

**(iii) Referring to the requested increase in volumetric emissions to atmosphere at emission points A1, A2 & A3, provide an impact assessment, using air dispersion modeling as necessary, of the maximum predicted organic solvent emissions to atmosphere from the facility. Where air dispersion modeling is used, please supply in electronic format (.dat format files), copies of the complete input, output and meteorological data used in the modelling assessment.**

**Response:**

(i) (a) The number of hours of activity per day have been altered from 24 hours to 8.5 hours per day.

Therefore Table E1 (ii) now reads as follows:

|                                |                          |                     |                           |
|--------------------------------|--------------------------|---------------------|---------------------------|
| A1<br>Volume to be<br>Emitted: |                          |                     |                           |
| Average/day                    | 44982m <sup>3</sup> /day | Maximum/day         | 44,982m <sup>3</sup> /day |
| Maximum rate/hour              | 5292 m <sup>3</sup> /h   | Min efflux velocity | 8.50m.sec <sup>-1</sup>   |

|                                |                          |                     |                           |
|--------------------------------|--------------------------|---------------------|---------------------------|
| A2<br>Volume to be<br>Emitted: |                          |                     |                           |
| Average/day                    | 44982m <sup>3</sup> /day | Maximum/day         | 44,982m <sup>3</sup> /day |
| Maximum rate/hour              | 5292 m <sup>3</sup> /h   | Min efflux velocity | 8.50m.sec <sup>-1</sup>   |

|                                |                          |                     |                          |
|--------------------------------|--------------------------|---------------------|--------------------------|
| A3<br>Volume to be<br>Emitted: |                          |                     |                          |
| Average/day                    | 21420m <sup>3</sup> /day | Maximum/day         | 21420m <sup>3</sup> /day |
| Maximum rate/hour              | 2520 m <sup>3</sup> /h   | Min efflux velocity | 8.50m.sec <sup>-1</sup>  |

(i) (b) Current licensed parameters are T.A. Luft Organics Class 1 and Total Organic Carbon (as C). As part of this licence review, we hope to update T.A. Luft Organics to Class 3 as operations at RILTA fall under category No. 8 activity listed, 'Other Coating'. RILTA use less than the 15 tonnes per year threshold and that suggests an ELV of 100mg/C/Nm<sup>3</sup>. Therefore, the current licence thresholds (192-01) should be reviewed and updated.

#### Statutory Instrument -543

According to S.I.543 -

"Any substance or preparation, which because of its content of VOCs classified as carcinogens, mutagens or toxic to reproduction under Directive 67/548/EEC2, is assigned or needs to carry the risk phrases R45, R46, R49, R60, R61 shall be replaced as far as possible, and, taking into account article 20(1)(b), by less harmful substances or preparations."

Materials in use at RILTA Environmental do not fall under any of these categories and instead have been assigned the following risk phrases-

R10 -Flammable

R38 - Irritating to skin

R20/21 - Harmful by inhalation/contact with skin

R52/53 - Harmful to aquatic organisms.

Therefore, it appears appropriate for the classification to be downgraded from Class 1 (Waste Licence 192-01) to Class 3 (Waste Licence 192-02).

(ii) As the above revised volumes emitted from A1, A2 and A3 are significantly lower than in the first licence review application, W0192-02, it is believed that an impact assessment is unnecessary. In addition, ongoing biannual and annual monitoring of the three emission points is carried out at RILTA and the results are forwarded to the EPA.

In addition, the maximum amount of VOC emitted at the facility as cited in Item 4 above, 1883kg, is well within the threshold listed in the Solvents Directive. Therefore, an impact assessment is not deemed necessary.

Rilta Environmental used 1983Kg of solvent products as part of its painting and cleaning process in 2006. This low figure is below the minimum threshold figure of 5,000Kg for 'Other coating, including metal', according to S.I. 543/2002. We therefore believe that dispersion modeling is not required as the level of solvent use is so low.

## ITEM 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.**

### Response:

Leachate has been produced in minimal quantities in the contaminated soil bay since activities began at RILTA Environmental Ltd. Evapotranspiration removes most leachate but on a small number of occasions a RILTA Environmental tanker has been used to take up between 500 and 1000 litres for disposal in the waste treatment plant. It is proposed that this process will continue as required.

## ITEM 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.**

### Response:

- (i) Installation of drainage network including silt traps and oil interceptors. This work has been completed.
- (ii) Installation of secondary containment system with leak detection to underground settlement tanks. This work has been completed.
- (iii) Installation of decant room at Hazardous Waste Transfer Station. There are no plans to complete these works at the present time.
- (iv) Installation of photographic waste treatment unit at Hazardous Waste Transfer Station. There are no plans to complete these works at the present time.

## ITEM 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.**

### Response:

Dust emissions, including impacts and mitigation measures are dealt with in Chapter 8 of the Environmental Impact Statement as submitted as part of the planning application in April 2007. The EIS has been previously submitted to the Agency.

Some odours are generated on-site, mostly during waste deliveries. While it is impossible to prevent odours completely, shutters are kept closed whenever possible. Also in the case of the Waste Treatment section, all waste streams are checked for odours before being allowed to tip off.

## ITEM 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:**

|   |                |
|---|----------------|
| <b>2. The disposal of Hazardous Waste</b> | <b>€2,500</b>  |
| <b>4. The recovery of waste</b>           | <b>€ 6,000</b> |
| <b>Fee Payable</b>                        | <b>€28,500</b> |

### Response:

Please find enclosed a cheque for the additional €2,500.

Please note, however, that the proposed changes to the licence under this review application will not lead to a significant increase in overall impacts from the facility. Therefore, it is the intention of RILTA Environmental Ltd., to seek a refund which reflects the extent of the proposed changes to Waste Licence 192-01 using the discretionary power available to the Environmental Protection Agency under Section 45(1) of the Waste Management (Licensing) Regulations 2004 (S.I. 395 of 2004).

## 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.**

### Response:

(a) As mentioned in Item 5 above, the number of hours of activity at the facility has been altered from 24 hours to 8.5 hours per day.



Therefore Table E1 (ii) now reads as follows:

|                                |                          |                     |                           |
|--------------------------------|--------------------------|---------------------|---------------------------|
| A1<br>Volume to be<br>Emitted: |                          |                     |                           |
| Average/day                    | 44982m <sup>3</sup> /day | Maximum/day         | 44,982m <sup>3</sup> /day |
| Maximum rate/hour              | 5292 m <sup>3</sup> /h   | Min efflux velocity | 8.50m.sec <sup>-1</sup>   |

|                                |                          |                     |                           |
|--------------------------------|--------------------------|---------------------|---------------------------|
| A2<br>Volume to be<br>Emitted: |                          |                     |                           |
| Average/day                    | 44982m <sup>3</sup> /day | Maximum/day         | 44,982m <sup>3</sup> /day |
| Maximum rate/hour              | 5292 m <sup>3</sup> /h   | Min efflux velocity | 8.50m.sec <sup>-1</sup>   |

|                                |                          |                     |                          |
|--------------------------------|--------------------------|---------------------|--------------------------|
| A3<br>Volume to be<br>Emitted: |                          |                     |                          |
| Average/day                    | 21420m <sup>3</sup> /day | Maximum/day         | 21420m <sup>3</sup> /day |
| Maximum rate/hour              | 2520 m <sup>3</sup> /h   | Min efflux velocity | 8.50m.sec <sup>-1</sup>  |

**Chemical Characteristics of the Emissions:** Current licensed parameters are T.A. Luft Organics Class 1 and Total Organic Carbon (as C). Refer to Item 5 (b) above.

(b) As the above revised volumes emitted from A1, A2 and A3 are significantly lower than in the first licence review application, W0192-02, it is believed that an impact assessment is unnecessary. In addition, ongoing biannual and annual monitoring of the three emission points is carried out at RILTA and the results are forwarded to the EPA.

In addition, the maximum amount of VOC emitted at the facility as cited in Item 4 above, 1883kg, is well within the threshold listed in the Solvents Directive. Therefore, an impact assessment is not deemed necessary and no changes have been made to the EIS which would warrant inclusion in hardcopy or digital copy format.

## Non-Technical Summary

The above information accompanies the previously submitted Waste Licence Review Application for RILTA Environmental Ltd. The original review application was submitted on June 1st 2007.

Changes to this application, as detailed above, include

1. The inclusion of Class 5 of the Fourth Schedule of the Waste Management Acts 1996 to 2005 of the original application (Regeneration of Acids or Bases) no longer applies to the facility.
2. Details of the current and proposed annual solvent usage at the facility have been included as requested and were found to be within the statutory threshold under S.1.503, 2002 regulations.
3. The maximum volumetric emission rates have been altered to reflect an 8.5 hour working day. A 24 hour period was incorrectly cited in the original review application.

RILTA Environmental Ltd. are requesting an increase in the volumetric flow rate at air emission point A2 and a reduction in classification of T.A.Luft Organics from Class 1 to Class 3 at all emission points to reflect the appropriate risk phrases at the facility.

4. Leachate is produced in minimal quantities at the facility but when required, a tanker removes leachate for disposal in the waste treatment plant.
5. Works involving the installation of a drainage network and a secondary containment system have been completed. There are no plans at present to complete the installation of a decant room or a photographic waste treatment unit.
6. Based on an increase in tonnage at the facility, all mitigation measures cited in the EIS previously submitted to the EPA will be adhered to during operations.

# APPENDIX I

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## Notice of the Waste Licence Application as issued to South Dublin County Council

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# APPENDIX 2

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## Final Grant of Permission from South Dublin County Council

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