TOBIN
Patrick J. Tobin & Co. Ltd.

Consulting Engineers

www.tobin.ie

Block 10-4,
Blanchardstown Corporate Park,
Dublin 15, Ireland.
Tel: +353 (0)1 8030401/6
Fax: +353 (0)1 8030409/10

Fairgreen House,
Fairgreen Road,
Galway, Ireland.
Tel: +353 (0)91 565211
Fax: +353 (0)91 565398

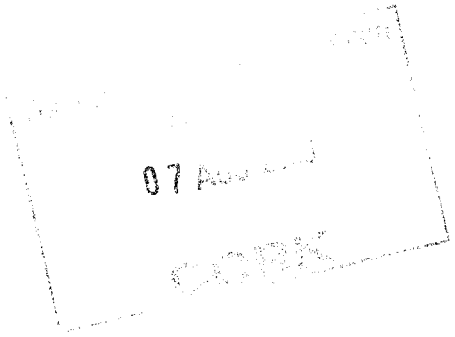
Northpoint House,
New Mallow Road,
Cork, Ireland.
Tel: +353 (0)21 4308624
Fax: +353 (0)21 4308625

Bedford Place, Howleys Quay,
Lower Shannon Street,
Limerick, Ireland.
Tel: +353 (0)61 415757
Fax: +353 (0)61 409378

Market Square,
Castlebar,
Co. Mayo, Ireland.
Tel: +353 (0)94 9021401
Fax: +353 (0)94 9021534

2nd Floor, Elgee Building,
Market Square, Dundalk,
Co. Louth, Ireland.
Tel: +353 (0)42 9335107
Fax: +353 (0)42 9331715

5th August 2009



Ms. Marie O'Connor
Senior Inspector
Office of Climate, Licensing & Resource Use
Environmental Protection Agency
Headquarters
PO Box 3000
Johnstown Castle Estate
Co. Wexford

Re: Notice in Accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

Dear Ms. O'Connor,

In response to your request for information regarding the above for Rilta Environmental Ltd-Waste Licence W0192-03, please find enclosed one (1) original plus one (1) copy of additional information in hardcopy format. Please also find enclosed two (2) copies of the requested information in electronic searchable PDF format on CD-ROM.

If you have any queries regarding this report, please contact me at your earliest convenience.

Yours sincerely,

Siobhán Tinnelly
Senior Scientist

RILTA ENVIRONMENTAL Ltd.

Review of Waste Licence 192-03

Response to request for Additional Information Environmental Protection Agency (EPA) Article 14(2)(b)(ii)

August 2009

TOBIN CONSULTING ENGINEERS

TOBIN
Patrick J. Tobin & Co. Ltd.

REPORT

PROJECT:

Waste Licence Review 192-03
Response to request for Additional Information
Environmental Protection Agency (EPA)

CLIENT:

Rilta Environmental Ltd.
Block 402,
Grant's Drive
Greenogue Business Park,
Co. Dublin

COMPANY:

TOBIN Consulting Engineers
Block 10-4
Blanchardstown Corporate Park
Dublin 15

www.tobin.ie

DOCUMENT AMENDMENT RECORD

Client:	**Rilta Environmental Ltd.**
Project:	**Waste Licence Review 192-03**
Title:	**Response to request for Additional Information – EPA**

PROJECT NUMBER: 4709				DOCUMENT REF:			
A	Additional Information Response -EPA	ST	29/07/09	DG	30/07/09	SF	04/08/09
Revision	**Description & Rationale**	**Originated**	**Date**	**Checked**	**Date**	**Authorised**	**Date**
TOBIN Consulting Engineers							

TABLE OF CONTENTS

APPENDIX

As requested by the Environmental Protection Agency (EPA), and in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations, Rilta Environmental Ltd. (hereafter referred to as Rilta) have responded to the further information items as follows:

ITEM 1

Submit a list of the specific wastes that will be accepted for treatment in the Hydrocarbon Treatment plant. Refer to Attachment H of the application and outline how the quality of these wastes will be assured as suitable for treatment.

Response:

Please find attached in Appendix A, a list of all wastes that may be accepted for treatment in the Hydrocarbon Treatment plant, at Rilta's Waste Management Facility. This list includes both Waste Oils and Waste Oils and Mixtures.

As part of the company's Environmental Management System (EMS), Rilta have included a detailed procedure regulating the acceptance of waste oil at the facility and the treatment of waste oil at the facility. This procedure (Waste Oil Acceptance Procedure) is included in Appendix B.

ITEM 2

Provide details of the tests and pass/fail criteria that will be used prior to mixing of oil waste for treatment in the Hydrocarbon Treatment plant and prior to treatment. Expand on Attachment D2.

Response:

As part of the company's Environmental Management System (EMS), Rilta have included a detailed procedure regulating the acceptance of waste oil at the facility and the treatment of waste oil at the facility. This procedure (Waste Oil Acceptance Procedure) is included in Appendix B.

ITEM 3

(3.1)Provide further details of the combustion plant that is referred to in Section 1 and (3.2) the proposed plant that will utilise the processed waste oil e.g. (3.3) thermal input, (3.4) any abatement/control systems for emissions such as NOx, SOx particulate and dioxins. (3.5)Refer to any restrictions on use that you would propose to notify to purchasers of the processed waste oil and (3.6) the type of fuel that it would be replacing.

Response:

3.1. The combustion plant that is referred to in Section I1 was used to carry out combustion gas monitoring on a sample of reprocessed waste oil. The results of the combustion gas monitoring of the reprocessed waste oil compared to gas oil is shown in the report '' Emission Monitoring of the Waste Oil Burning Process'' which was carried out by Resource and Environmental Consultants Ltd.

Waste oil and gas oil were used to fuel the combustion plant and velocity, flow and temperature data were reported at actual stack conditions.

The combustion plant details are as shown below:

- Manufacturer – John Jeffries
- Model – Steam sprint B32
- Serial No. – DE25/171402
- Steam Output – 700lbs/hr
- Max Pressure – 150 psig
- Fuel – 35sec gas oil
- Consumption 6 gal/hr

3.2. It is proposed that Rilta will supply the "reprocessed waste oil to be reused as a fuel" to the quarrying industry and similar industries subject to approval by the EPA, for use in onsite combustion plants. In the case of the quarrying industry, this plant will comprise of an **Asphalt plant.**

The proposed asphalt plant will be dependent on the quarry the reprocessed waste oil is supplied to. Each quarry may have different equipment or manufacturer. However we can make reference to the most commonly found asphalt plant found in Ireland which is the Benninghoven RJ2 & RJ3. See attachment C for Schematic Layout.

An **asphalt plant** is a plant used for the manufacture of asphalt, macadam and other forms of coated roadstone, sometimes collectively known as blacktop. The manufacture of coated roadstone demands the combination of a number of aggregates, sand and a filler (such as stone dust), in the correct

proportions, heated, and finally coated with a binder, usually bitumen based or, in some cases, tar. The temperature of the finished product must be sufficient to be workable after transport to the final destination. A temperature in the range of 100 - 200 degrees Celsius is normal.

There are three main classes of plant: batch heater, semi-continuous (or "asphalt plant"), and continuous (or "drum mix"). The batch heater has the lowest throughput, the continuous plant the highest at up to around 500 Tonnes per hour.

Sand- One key ingredient of most roadstones is sand. Sand generally has a high water content. Boiling off this water is a large part of the energy cost of heating the aggregate, in turn a significant part of the overall cost of operation. The water content of sand also varies considerably, especially when stored outdoors, being typically of the order of some tens of percent of the overall mass of wet sand. Since sand takes the form of small grains, with a high surface area per unit volume, and binder attaches to the surface of the aggregates, the amount of dry sand in the mix is particularly critical to the overall blend; the moisture content must be measured and the equivalent dry weight calculated.

Binder-Binder comes in different grades known as "penetration" or "pen" grades, with values varying between around 30 and 300. The pen value is an expression of the depth to which a standard needle will penetrate the surface of the binder at a specified temperature (the higher the value, the softer the binder). This has an effect on the workability of hot asphalt and the stiffness of the asphalt when cooled. Lower pen values give harder wearing. Asphalt wearing courses are typically 35-50 pen, base courses will be higher, typically 200 or 300 pen. The coating plant may combine binder of different grades to achieve a grade between those held on site.

Filler-Filler, as the name implies, fills the voids between aggregate grains and improves the wearing capabilities of the overall mix. It is stored and fed dry into the mix, during or after addition of binder. A common source of filler is fines from the heating process recovered by bag filters or wet filtration ponds from the exhaust of the heating drum.

Types of plant

Batch heater- These are the most common type of plant found in Ireland. A batch heater plant weighs the raw aggregates into a heater drum, where the batch is then heated up to temperature. The hot aggregate is discharged into a mixing drum where (dry) filler and binder are added. The blend is mixed and discharged either directly into the delivery vehicles or into a small weighing and collecting hopper. To increase throughput, the heater can be heating the next batch while the previous is being mixed. Capacity is usually of the order of tens of tonnes per hour.

Hot storage- Finished roadstone must be kept heated to avoid setting. It is commonly stored in large electrically heated insulated stainless steel silos, from which it is weighed into delivery vehicles. This

may be achieved by intermediate weigh hoppers (which may shuttle between hoppers) or by mounting the hoppers directly on load cells. Control of loadout by this method involves accurately predicting the material "in flight" between the discharge door and the vehicle.

Control- Precise control is a necessity. Asphalt mixing and loadout plant typically use a combination of industrialised computer control and programmable logic controllers to achieve this.

With asphalt being a real-time product, timing is important when it comes to delivering product amounts to job sites, etc. 2008 has provided plants with a level of control over equipment by utilizing GPS, RFID and other forms of tracking systems. Tracking provides information throughout the supply chain to make sure that the right amount and type of product is delivered to the correct site in a timely manner and with better accuracy.

3.3. The plant will typically have a thermal input of 16.6MW. It will be of a multi fuel type which allows it to use either gas oil or waste derived fuels such as the Rilta reprocessed waste oil. The waste derived fuels will require a pre-heater to ensure that the oil is at the required viscosity to ensure efficient combustion. See Appendix C for schematic layout. The burner is described as a modulating burner which can typically burn fuel from 175kg/hr to 1400kg/hr dependant on the throughput and moisture of the aggregate mix. The nozzle pressure is from 1bar to 6bar.This type of plant will typically use from 7lts to 12lts of fuel per ton of heated material again dependant on throughput and moisture of the aggregate mix.

3.4. The emissions from the burner are governed and controlled by the quarry operator. Typically this involves the burning of the fuel in the aggregate drying drum as described previously. The exhaust gases from the combustion of the fuel and the fine and coarse dust particles which come from the aggregate mix are directed by the air flow into sealed ducting. This leads to a blade skimmer which separates the coarse dust particles and directs them into a hopper or skip for re-use within the process at a later stage. The exhaust gases and fine particles then pass through further sealed ducting into the bag filters which are contained within the bag house. The bag filters retain the fine dust particles and the exhaust gases go into further ducting and into the exhaust stack for release to the atmosphere. The stack will have a stack monitor which will be used to measure the exhaust gases. The frequency of monitoring, the emission parameters to be measured and the allowable levels for these parameters are set by the relevant local county council in the Air Emissions Licence. In section I1 of the Waste Licence Review Application (January 2009) the results of the combustion gas monitoring of the reprocessed waste oil compared to gas oil are shown and it is noted that the levels for NOx, SOx and particulates are low in comparison to the typical quarry Air Emissions Licence. In addition dioxins in the form of VOC's were measured during this test and found to be below 1 (<1). See Attachment I1 of the Waste Licence Review Submission for the report on combustion.

3.5. Restrictions on Use/ Regulation of Delivery:

As part of the company's Environmental Management System (EMS), Rilta have included a detailed procedure regulating the Delivery of Oil to customers. This procedure (Processed Oil Delivery Procedure) is included in Appendix B.

All clients/customers will get a commercial sale agreement/contract which must be signed by both parties. As part of the typical sale agreement/contract the client/customer is instructed in writing that the "reprocessed waste oil for re-use as a fuel" can only be used specifically in the Asphalt Plant referred to in the sale agreement/contract.

3.6. The reprocessed waste oil will typically be replacing 35 sec gas oil.

ITEM 4

Indicate if the REACH regulations apply and provide written confirmation of the status of the processed waste oil from the Health and Safety Authority regarding MSDS, REACH and legislation related to the packaging and labelling of products/chemicals.

Response:

Following a request for confirmation from the Health and Safety Authority (HSA) as to whether the reprocessed waste oil falls under the regulations of REACH, MSDS or other packaging/labelling legislation – the following response was received on July 29th 2009:

"Waste is not within the scope of REACH, the new CLP or the existing CPL Regulations so would not require a label or Safety Data Sheet. However, what you do with these waste oils once they are gathered and mixed will determine if you have any responsibility with compliance with these Regulations. If the product is being reused and placed on the market as a new product this then means that the requirements of REACH and CLP/CPL apply in full but if it remains as a "waste" then the legal provisions regarding the waste apply and you should contact the EPA in this regard."

As can be seen from the response from the HSA, if the oil is classified as 'reprocessed waste oil for re-use as a fuel' it will not be within the scope of REACH or CLP/CPL.
RILTA used the REACH classification tool to determine whether REACH registration would be necessary if the reprocessed waste oil is placed on the market as a fuel. The results indicated that it would not be necessary to register with REACH.

A copy of the correspondence from the HSA is included in Appendix D.A copy of the results from the REACH classification tool are included in Appendix E.

REVISED NON-TECHNICAL SUMMARY:

Please note that as requested, a revised non-technical summary is included in Appendix F.

APPENDIX A
List of Waste Oils for Acceptance & Treatment (EWC Codes)

European Waste Catalogue (2001/118/EC as amended)

Attachment I - Waste Oils

05 01 05*	oil spills
08 03 19*	disperse oil
12 01 06*	mineral-based machining oils containing halogens (except emulsions and solutions)
12 01 07*	mineral-based machining oils free of halogens (except emulsions and solutions)
12 01 10*	synthetic machining oils
12 01 19*	readily biodegradable machining oil
13 01 09*	mineral-based chlorinated hydraulic oils
13 01 10*	mineral based non-chlorinated hydraulic oils
13 01 11*	synthetic hydraulic oils
13 01 12*	readily biodegradable hydraulic oils
13 01 13*	other hydraulic oils
13 02 04*	mineral-based chlorinated engine, gear and lubricating oils
13 02 05*	mineral-based non-chlorinated engine, gear and lubricating oils
13 02 06*	synthetic engine, gear and lubricating oils
13 02 07*	readily biodegradable engine, gear and lubricating oils
13 02 08*	other engine, gear and lubricating oils
13 03 06*	mineral-based chlorinated insulating and heat transmission oils other than those mentioned in 13 03 01
13 03 07*	mineral-based non-chlorinated insulating and heat transmission oils
13 03 08*	synthetic insulating and heat transmission oils
13 03 09*	readily biodegradable insulating and heat transmission oils
13 03 10*	other insulating and heat transmission oils
13 04 01*	bilge oils from inland navigation
13 04 02*	bilge oils from jetty sewers
13 04 03*	bilge oils from other navigation

13 05 06*	oil from oil/water separators
13 07 01*	fuel oil and diesel
13 07 03*	other fuels (including mixtures)
16 07 08*	wastes containing oil
19 02 07*	oil and concentrates from separation
19 08 10*	grease and oil mixture from oil/water separation other than those mentioned in 19 08 09
20 01 26*	oil and fat other than those mentioned in 20 01 25

European Waste Catalogue (2001/118/EC as amended)

Attachment II - Waste Oils and Mixtures

01 05 05*	oil-containing drilling muds and wastes
01 05 06*	drilling muds and other drilling wastes containing dangerous substances
05 01 05*	oil spills
05 01 06*	oily sludges from maintenance operations of the plant or equipment
05 01 12*	oil containing acids
10 02 11*	wastes from cooling-water treatment containing oil
10 03 27*	wastes from cooling-water treatment containing oil
10 04 09*	wastes from cooling-water treatment containing oil
10 05 08*	wastes from cooling-water treatment containing oil
10 06 09*	wastes from cooling-water treatment containing oil
10 07 07*	wastes from cooling-water treatment containing oil
10 08 19*	wastes from cooling-water treatment containing oil
12 01 06*	mineral-based machining oils containing halogens (except emulsions and solutions)
12 01 07*	mineral-based machining oils free of halogens (except emulsions and solutions)
12 01 08*	machining emulsions and solutions containing halogens
12 01 09*	machining emulsions and solutions free of halogens
13 04 01*	bilge oils from inland navigation
13 04 02*	bilge oils from jetty sewers
13 04 03*	bilge oils from other navigation
13 05 02*	sludges from oil/water separators
13 05 03*	interceptor sludges
13 05 07*	oily water from oil/water separators
13 05 08*	mixtures of wastes from grit chambers and oil/water separators
13 07 03*	other fuels (including mixtures)
16 01 13*	brake fluids
16 01 14*	antifreeze fluids containing dangerous substances
16 07 08*	wastes containing oil
19 02 07*	oil and concentrates from separation
19 08 10*	grease and oil mixture from oil/water separation other than those mentioned in 19 08 09
20 01 26*	oil and fat other than those mentioned in 20 01 25

APPENDIX B
EMS Acceptance and Delivery Procedures

RILTA Environmental Ltd.			
EMS PROCEDURE MANUAL			
TITLE	WASTE OIL ACCEPTANCE	**REF**	
ISSUED BY		**APPROVED BY**	
DATE	JULY 2009	**PAGE**	1 of 3

This document is issued and controlled by the Environmental Manager. This is a controlled document subject to change at any time, and therefore should not be copied. Only signed, authorised copies may be used as working documents.

Revision	Description	By	Approved	Date

1.0 Purpose

To ensure that all waste oils accepted for treatment are suitable for use as a re-processed fuel.

2.0 Scope

This procedure details the notification, pre-acceptance, sampling and analysis prior to waste entering the waste oil treatment batch process.

3.0 Responsibility

The Oil Treatment Plant Manager is responsible for ensuring that this procedure is carried out. Relevant site staff are responsible for following this procedure.

4.0 Procedure

4.1 All waste oil loads must be notified at least 24 hours in advance (emergency spills etc excepted) with following information:

- Source of waste
- Description of waste
- EWC code for the waste (As detailed in Attachments I and II)
- Volume of Waste
- Carrier of waste
- Analysis of waste if applicable

4.3 The following waste types are not acceptable for treatment:

- Petrol
- Solvent contaminated oil
- Oil with food grease contamination
- Plant and edible oils
- Oil with ammonia contamination

4.3 Transformer oils or oils with suspected PCB (Polychlorinated Biphenyls) contamination may not be accepted prior to sampling. While PCB certs will be accepted, all loads with these certs will also be tested for PCB's.

4.4 Transformer oils which show the presence of PCB's ≥ 10 will be quarantined and an alternative form of disposal shall be agreed.

4.5 All notified waste oil jobs will be entered onto the Rilta Environmental's data management system, with all the information detailed above. This information will all appear on the 'daily diary' so all stakeholders within the company know what waste oil loads are due in on any given day.

4.6 When a waste oil load arrives on site, it will be weighed in and directed to the waste oil unloading area. The oil division/laboratory operatives will have all the relevant load detail on Data Management System and will sample the load for testing.

4.7 Testing will be completed in the laboratory and the following parameters will be analysed:

- Water content (%) >20% and the oil shall be re-directed to the aqueous treatment plant
- Flash point (°C) < 66 degree C and the oil will be re-directed for alternative form of disposal
- Chlorine > 3000ppm and the oil will be re-directed for alternative form of disposal

4.8 Transformer Oil loads, or loads of halogenated oil will require an additional PCB/Total Halogen test to confirm suitability for treatment.

4.9 Mixed oil loads, such as those detailed in Attachment II may be directed to the aqueous treatment area to unload the 'water' element of the load before proceeding to unload the oil element as per normal.

4.10 All 'batches' of oil collected at the delivery area shall be bench tested to determine the most suitable course of treatment.

RILTA Environmental Ltd.			
EMS PROCEDURE MANUAL			
TITLE	PROCESSED OIL DELIVERY PROCEDURE	**REF**	
ISSUED BY		**APPROVED BY**	
DATE	JULY 2009	**PAGE**	1 of 3

This document is issued and controlled by the Environmental Manager. This is a controlled document subject to change at any time, and therefore should not be copied. Only signed, authorised copies may be used as working documents.

Revision	Description	By	Approved	Date

1.0 Purpose

To ensure that all processed oil delivered for use on external sites is suitable and has associated full traceable paperwork; and to ensure that the oil is used in an approved manner at an approved location.

2.0 Scope

This procedure details the loading, completion of all associated paperwork and delivery requirements of consignments of processed oil.

3.0 Responsibility

The Oil Treatment Plant Manager is responsible for ensuring that this procedure is carried out. Relevant site staff are responsible for following this procedure.

4.0 Procedure

4.1 All processed oil loads must be notified at least 48 hours in advance to allow for transport and all associated paperwork to be prepared. Only fully clean tankers from approved companies will be allowed to transport processed waste oil.

4.2 A finished processed oil product tank which has been tested and approved for shipment is selected.

4.3 A load card will be inserted into the calibrated oil flow-meter and loading shall then proceed. The meter measures volume in litres.

4.3 Loading will be supervised at all times by a Rilta employee until the required amount has been dispensed. The completed flow-meter card is then removed from the printing slot. Copies of this triplicate document will go to the following stakeholders:

- Processed oil production department
- Processed oil carrier
- Rilta invoicing/records

4.4 The full load will then be weighed and all relevant paperwork be given to the carrier. This will include the following:

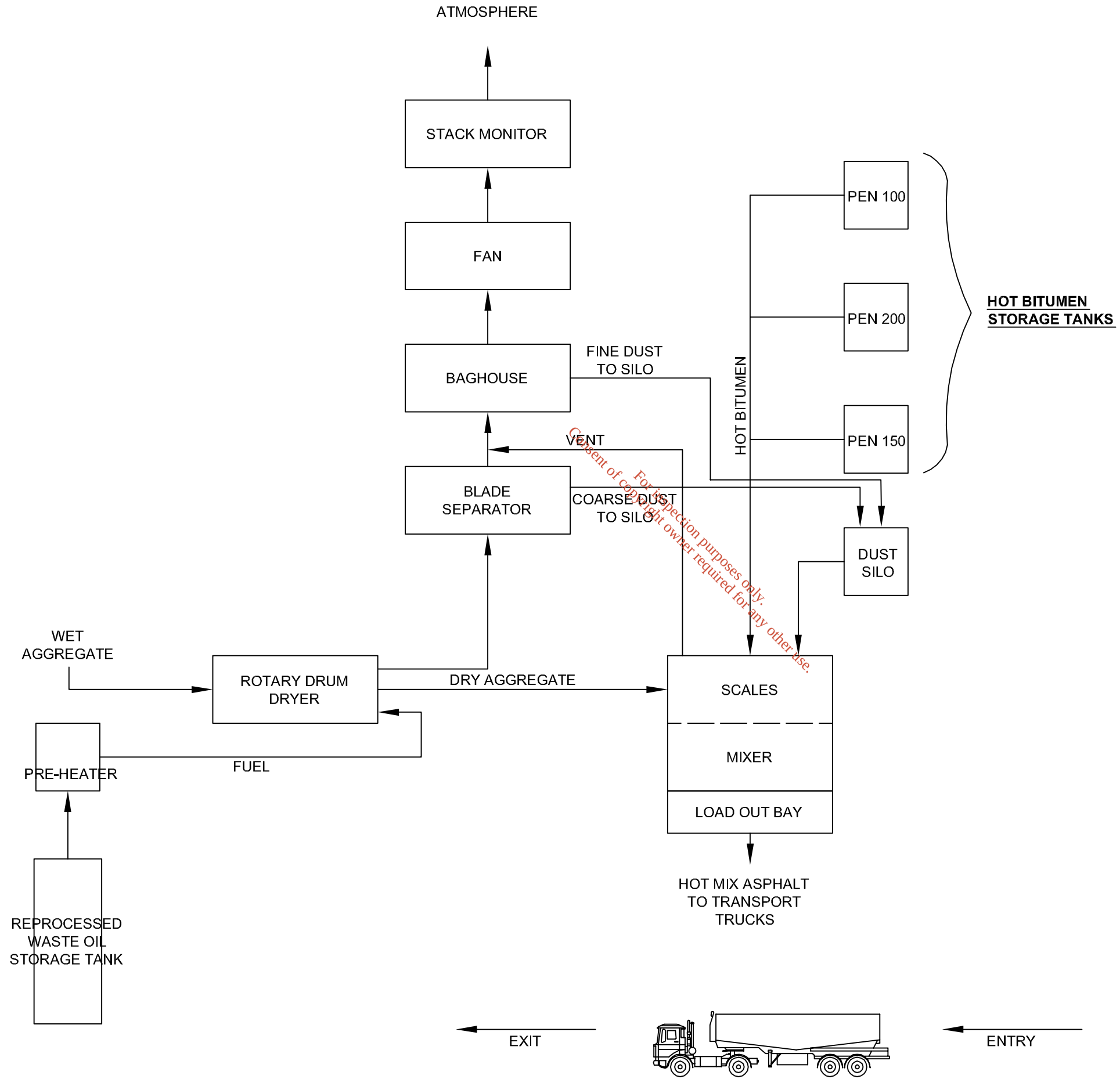
- Approved consignment note
- Load test cert
- Triplicate copy of completed oil flow meter card
- Delivery docket

4.5 All notified processed oil delivery jobs will be entered onto Rilta Environmental's data management system, with all the relevant information. This information will all appear on the 'daily diary' so all stakeholders within the company know what processed oil loads are due to be delivered on any given day.

4.6 The carrier will then proceed to the delivery site. The driver will connect his delivery hose to the processed waste oil storage tank and discharge the load. The driver will get the delivery docket completed and signed by the relevant site supervisor/manager. The delivery docket will include instruction that the processed waste oil must only be discharged and used from the appropriate storage tank as per the contract agreement between Rilta and the approved user.

4.7 The completed delivery dockets and associated paperwork will be returned to Rilta Environmental so the invoicing process may begin. Records of all paperwork will be kept by Rilta Environmental for the required period.

APPENDIX C
Details and Drawing of Combustion Plant



Rev	Date	Description	By	Chkd
D01	30.07.09	DRAFT ISSUE FOR REVIEW	MN	ST

Client:
RILTA
ENVIRONMENTAL LTD.

Project:
ASPHALT BATCHING PLANT

Title:
PROCESS FLOW SCHEMATIC

Scale @ A1: NTS

Prepared by:	Checked:	Date:
M. Nolan	S. Tinnelly	July 2009

Project Director: D. Grehan

Drawing Status: Draft

TOBIN
Patrick J. Tobin & Co. Ltd.
TOBIN Consulting Engineers,
Block 10-4, Blanchardstown Corporate Park,
Dublin 15, Ireland.
tel: +353-(0)1-8030406
fax:+353-(0)1-8030409
e-mail: dublin@tobin.ie
www.tobin.ie

Drawing No.: 4709-1000 Revision: D01

APPENDIX D
Correspondence from the HSA

From: clp [mailto:clp@hsa.ie]
Sent: 29 Iúil 2009 12:14
To: Thompson, Kieran
Subject: rfi8016.waste.eml.29jul2009

Dear Kieran,

Thank you for contacting our Helpdesk, in response to your enquiry please find attached our response below.

Your enquiry: I made a phone call to your office this morning in relation to this. I have completed the link below. I suppose what I am looking from you is the following. Witten Confirmation from the HSA regarding safety Data Sheets, Reach and legislation related to Packaging and labelling of product / chemicals The process that we do is collect waste oils such as Industrial Fuel Oils, Inland & Marine Grades , Heavy Fuel Oils - Hot or Cold Medium / Heavy Fuel Oils ,Light Fuel Oils Gas Oils , Diesel Fuel ,Kerosene ,Lubricant Grades ,Motor Oils ,Hydraulic Oils ,Electrical Oils ,Turbine Oils ,Chemical Grades ,Heat transfer oils and fluids ,Agricultural waste oils ,Engine oils Clean all these oils and remove all contaminants from it and sell the oil on as a fuel for burning My question is as follows 1. Does this fuel require a Safety Data Sheet , There are so many different oils that we take in , it is difficult to have a safety Data sheet for them , Then we have them mixed with each other which is now a combination of these oils 2. Does the fuel fall under the category of the Packaging and Labelling Regulations

Our Response: Waste is not within the scope of REACH, the new CLP or the existing CPL Regulations so would not require a label or Safety Data Sheet, However, what you do with these waste oils once they are gathered and mixed will determine if you have any responsibility with compliance with these Regulations. If the product is being reused and placed on the market as a new product this then means that the requirements of REACH and CLP/CPL apply in full but if it remains as a 'waste' then the legal provisions regarding the waste apply and you should contact the EPA in this regard.

If you require further assistance please do not hesitate in contacting the helpdesk again

Caroline

On behalf of the Helpdesk team.

Subscribe to REACH/CLP E-Bulletin

The information provided here is given as guidance only based on CLP Regulation (EC) No 1272/2008 . The information provided is not, and is not intended to be, a legal interpretation of the Regulation and does not constitute legal advice. The CLP helpdesk accepts no liability with regard to how this information may be interpreted or used. Interpretation of, and compliance with, the CLP Regulation in relation to specific substances or mixtures remains the responsibility of those who are manufacturing, importing, distributing or using such substances or mixtures.

For all queries on CLP and REACH please contact our helpdesk on 1890 289 389, or email

clp@hsa.ie or reachright@hsa.ie

APPENDIX E
Results from REACH Classification tool

Your Navigator ID is: 5488-6623-4660 - Name: Colm

History

Question n°1

Q: Is the substance any of the following?
- A radio-active substance
- A substance under customs supervision
- A substance used exclusively in the interest of defence, covered by national exemption
- A waste
- A substance used exclusively as a non isolated intermediate
- A ""transported substance"" (i.e. you exclusively transport the concerned substance)

A: No

Question n°2

Q: Are you manufacturer or importer of the substance on its own or in (a) preparation(s)?

A: No

Question n°3

Q: Do you import the substance in (an) article(s) ?

A: No

Question n°4

Q: Do you produce articles containing the substance ?

A: No

Question n°5

Q: Do you distribute or store substances or preparations without importing or using them?

A: No

Question n°6

Q: Do you mix substances as such or in preparations for supplying preparations further down the supply chain?

A: Yes

- **Fulfil formulators' obligations**

Question n°7

Q: Do you place articles containing the substance on the market?

A: Yes

Question n°8

Q: Is the substance on the candidate list of substances for eventual inclusion in Annex XIV, established according to Article 59?

A: No

Question n°9

Q: Is the substance listed in Annex XVII (list of restrictions)?

A: No

No restriction applies to the substance. Check Annex XVII regularly. If the substance is contained in an article, do not forget to check whether any other substance included in the article is subject to restriction

---

Question n°10

Q: Is the substance listed in Annex XIV (list of substances subject to authorisation)?

A: No

No need to apply for authorisation at present. Check Annex XIV regularly if the substance meets the definition of Article 57.

APPENDIX F
Revised Non-Technical Summary

Section A

Attachment A

Non-Technical Summary

The non-technical summary is prepared in accordance with Article 12(1) of the Waste Management (Licensing) Regulations 2000 (S.I. No. 185 of 2000).

Current Facility and Proposed Change of Use

RILTA Environmental Ltd. (hereafter referred to as RILTA -formerly known as SITA Environmental Ltd.) operates an existing Integrated Waste Management Facility at Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, Co. Dublin.

The facility is located in south west County Dublin adjacent to Newcastle, approximately 1.5km north of the village of Rathcoole. Access to the facility is from the south, from the R120 that joins the N7 (Dublin-Limerick road). An overview of the regional site location is shown on Drawing No. 4709/1100 in Attachment A.1. Planning Permission was granted by An Bord Pleanála for this facility in 2003 - Planning Register Reference Number: SD 02A/0313 and An Bord Pleanála Reference Number: PL 06S.201534. The area referred to as "Zone A" in the original Planning Application is the current operational area of RILTA. Construction on the facility began in 2003 and RILTA began accepting waste in December 2004.

The site covers 1.1 hectares and is covered in hardstanding made ground. Information presented in the original EIS in May 2002 for this facility included baseline environmental studies of the site and the area was described as unmanaged grassland that has been disturbed in the past. The site is bounded to the north by the Griffeen River. A 3m wide pathway is adjacent to the Griffeen River north of the RILTA site. A two metre strip of landscaping has also been left inside the site boundary around the perimeter of the site. The elevation of the site, which gently slopes in a northerly direction, is approximately 87.5mOD (Ordnance Datum-ODB).

The facility currently operates in accordance with a Waste Licence granted by the Environmental Protection Agency (EPA) –Waste Licence No.192-02. The quantity of waste currently accepted at the facility is limited to 111,000 tonnes per annum consisting of hazardous waste, commercial waste, construction and demolition waste, industrial sludges and industrial waste.

RILTA currently employs up to 65 personnel, full time at the current integrated waste management facility. Staffing numbers include operations managers, general managers, accountant, yard managers, maintenance engineer, vehicle drivers, general operatives and office staff.

The Integrated Waste Management Facility operates between the hours of 07:30 and 18:00 Monday to Friday and 07:30 and 14:00 hours on Saturdays. The facility remains closed on Sundays, Bank Holidays and Public Holidays. The facilities operate outside these hours only when they are required to cater for the later arrival of waste haulage vehicles due to breakdown or other circumstances. Maintenance is carried out outside operating hours.

TOBIN Consulting Engineers (hereafter referred to as TOBIN) have been commissioned by RILTA to undertake a waste licence review to obtain approval to reprocess waste oil for reuse as a fuel.

Description of the Proposed Activity

RILTA have been recovering oil from aqueous waste under various permitting systems for 30 years. The process became wholly regulated by the Agency in 1999 with the grant of Licence No. 35-1 to SITA Environmental.

Under Waste Licence No: 192-02, Condition 6.21.1 allows the processing of aqueous, hydrocarbon and sludge waste at the Hydrocarbon Waste Treatment Centre to be carried out as described in Section 2.3.2 of the EIS submitted on the 5th April 2007 with Planning Application Register Reference Number: SD07A/0260. Under this section of the EIS it is stated that the recovered oil from the hydrocarbon waste treatment process is removed from the site for further treatment at an authorised facility. Class 8 'oil re-refining or other re-uses of oil' licensed under the Fourth Schedule of the Waste Management Act 1996, has led to the reprocessing of waste oil within the RILTA facility. Based on the terms of the current Waste Licence No. 192-02 and the activities at the site, RILTA is requesting approval for the reprocessing of waste oil for reuse as a fuel.

The Need for the Change of Use

The processing of waste oils into a re-useable fuel has been carried out at Rilta and previously Pipe & Drain Ltd for many years. As noted in the Waste Oil Directive 75/442/EEC and the National Hazardous Waste Management Plan 2003, it is uneconomical to regenerate waste oils in Ireland. The commonly accepted practice has been to reprocess and re-use it as a fuel primarily in the quarrying industry.

Change of Use Procedures

Best Available Techniques (BAT) principles will be applied in executing the re-processing of waste oil to a particular specification to ensure that impacts on the environment will be minimal. No construction will be required or changes to the current site infrastructure.

SITE NOTICE LOCATION

SITE NOTICE LOCATION

SITE

SITE NOTICE LOCATION

GENERAL LEGEND

LANDS UNDER CONTROL OF DEVELOPER

ACTIVITY BOUNDARY

SITE NOTICE LOCATION

X

NOTES

1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING
2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
3. ENGINEER TO BE INFORMED BY THE CONTRACTOR OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
4. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD
5. OS DISCOVERY SHEET NO: OS -2822, OS-3022

210m 0 210m 420m 630m

Issue	Date	Description	By	Chkd.
A	28-01-08	FINAL ISSUE	VB	ST
D01	16-01-09	DRAFT ISSUE FOR REVIEW	MN	ST

Client: RILTA Environmental Limited

Project: HYDROCARBON PROCESSING WASTE LICENCE REVIEW

Title: REGIONAL SITE LOCATION MAP

Scale @ A1: 1:10,560

Prepared by:	Checked:	Date:
M. Nolan	S. Tinnelly	January 2009

Project Director: D. Grehan

TOBIN
Patrick J. Tobin & Co. Ltd.
Consulting, Civil and Structural Engineers,
Block 10-3, Blanchardstown Corporate Park,
Dublin 15, Ireland,
tel: +353-(0)1-8030406
fax:+353-(0)1-8030409
e-mail: info@tobin.ie
www.tobin.ie

Drawing No.: 4709-1100

Issue: A