



Licensing Unit

Office of Climate, Licensing & Resource Use

Environmental Protection Agency

PO Box 3000

Johnstown Castle Estate

Co. Wexford

April 8th 2010

Waste Licence Application Register No. W0192-03

Dear Sir/Madam,

I refer to the Agency's correspondence dated March 26th 2010 in relation to an objection to the proposed decision in respect of the waste licence application, register no. W0192-03. Please find attached Rilta Environmental's submission on the objection.

Yours sincerely,

Colm Hussey

Rilta Environmental Ltd.

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Rilta Environmental wishes to make the following submission to the Agency on the proposed decision in regard to the Licence application no. W0192-03. The submission is in response to an objection to the proposed decision lodged on March 24th 2010. The headings in the submission will correlate directly with those of the objection.

A. Acceptance of Hazardous Waste On-Site For Treatment

The objector raises concerns about the clarity with which the proposed licence details what hazardous waste may be accepted for treatment at the facility. It refers to use of the term 'hydrocarbon waste treatment plant' and questions the suitability of some of the EWC codes listed in 'Attachment H1' of the licence review application. It notes the criteria other facilities may lodge with the Agency when getting a EWC code approved and makes reference to issues with waste acceptance procedures and on-site storage.

Response

Condition 8.11.4 of the proposed decision states: 'Waste arriving at the facility shall be inspected and have its documentation checked at the point of entry to the facility and subject to this verification, weighed, recorded and directed to the Drum Recovery Centre, Hazardous Waste Transfer Station or Hydrocarbon Waste Treatment Centre as appropriate. On arrival at the Hydrocarbon Waste Treatment Centre, the waste shall be directed to either the aqueous, sludge or waste oil processing areas. Only after such inspections may the waste be unloaded for storage or processed for disposal or recovery'. A series of strict waste acceptance procedures has been developed by Rilta Environmental to ensure that waste being accepted at the facility is suitable for treatment. This involves, among other criteria, sampling and bench testing of all new waste streams before the waste is accepted at the site. While an EWC code will indicate the source process of the waste and is a vital tool in tracking waste streams, hazardous or otherwise, it is certainly not a conclusive tool to indicate whether and what treatment is suitable or not. Furthermore, in the case where waste has been deemed unsuitable for treatment, Rilta Environmental has the capacity to re-package the waste in UN-approved packaging, as required, and to store the waste in a suitably segregated and bunded warehouse prior to further disposal or recovery off-site.

Finally we would note that while the treatment plant has been colloquially, and indeed in previous licences, been referred to as the 'hydrocarbon waste treatment plant', an objection was submitted to the Agency, by the applicant, with regard to the proposed decision of W0192-02 when Rilta endeavoured to avoid confusion by suggesting the term 'aqueous' waste be used in place of 'hydrocarbon' waste. This was accepted by the Agency and the Final Decision amended to reflect such.

B. Emissions Control

(i) *Emissions to sewer*

The objector raises concerns about the potential effect certain waste streams/EWC codes could have on the quality of discharge to foul sewer and the frequency of associated monitoring.

Response

As described previously, Rilta Environmental has implemented waste acceptance criteria to ensure that only waste streams suitable for treatment are accepted at the hazardous waste treatment facility. The objector states on a number of occasions that Rilta accepts solvents and laboratory chemicals (EWC 14 06 03 and 16 05 06) for treatment. While minimal amounts of wastes were accepted using these codes (see Attachment H1 of the application), the description given to the wastes by the consignor were 'aqueous washings' and 'glycol washings'. Rilta does not have control of what EWC code a customer will assign to a waste batch on a C1 form and must report the data accordingly. Rilta does, however, have full control of the types of waste accepted for treatment. Rilta Environmental does not accept solvents for treatment as they would, by their nature, disrupt the treatment process and invariably cause issues to the foul sewer discharges. Likewise, it is suggested in the objection that oil contaminated with ammonia is being accepted for treatment. It is not. It is specifically stipulated in section 2.1 of Attachment D2 of the application that oil contaminated with ammonia will not be accepted for treatment.

Reference is also made to the treatment of acidic and alkaline waste streams and there seems to be a suggestion that the discharge from a neutralisation process would be released to foul sewer. This is not the case as all discharge's would be re-directed through the aqueous treatment plant where the resultant salt sludge's may be de-watered and exported for further disposal/recovery and the aqueous fraction would undergo further treatment before being discharged to foul sewer.

I would note that a representative from South Dublin County Council visits the site every month to take samples and a due diligence visit was completed as part of this licence application. While parameters may vary slightly from licence to licence, because each case is different and must be treated on its own merits, it should also be noted that all licences will vary anyway and indeed there are parameters included in the Rilta foul sewer emissions that are not included in other 'similar' licences, if such comparisons can reasonably be made. With regard to the frequency of the monitoring undertaken, Rilta does not have any comment other than it does complete COD analysis on foul sewer discharge on a daily basis as a matter of best practice and would accept the frequency set by South Dublin County Council as being adequate and appropriate

(ii) Emissions to Air

The objector is concerned with emissions to air from treatment processes on site.

Response

The objector refers to BAT no. 72(d) which applies to neutralisation reactor vessels. The neutralization plant referred to by the objector and currently being commissioned at Rilta is not in the scope of this Licence review. The treatment processes currently employed on the site have been undertaken in this manner for many years and the possible requirements of abatement / monitoring are addressed in Sections 5.1, 5.2 & 6.9 and Schedule C.1.1 of the proposed decision. I would also note that Rilta completes and submits to the Agency as part of the AER, a boiler efficiency report which details all the emissions from the on-site treatment process boiler.

C. Production of Fuel from Waste Oil

(i) REACH

The objector discusses the possible requirements Regulation (EC) No. 1907/2006 as amended (REACH) and its consequences for a 'recovered oil' product.

Response

Rilta Environmental pre-registered under the terms of Regulation (EC) No. 1907/2006 (REACH) in 2008.

(ii) Waste Oil Recovery Process

The objector raises issues with the quality parameters set out in Schedule C8 of the PD. It also queries the PCB testing criteria and the exclusions of exclusion of EWC codes of chlorinated oils from the PD.

Response

Rilta Environmental has taken much advice from key personnel who over the past number of years have been involved in developing the 'Interim Standard' and the 'Quality Protocol' analytical parameters for recovered oil in the UK. Indeed, the 'proposed parameters' put forward by the applicant in the Licence review were based on the quality protocol and interim standard as it was felt that this was the direction best practice would take to ensure

both a reasonable 'end of waste' criteria and the prevention of environmental pollution. Rilta did stipulate in the application that these parameters would be difficult to meet initially, but remains committed to achieving the quality protocol (or a similar set of criteria as possibly amended) in the future.

In terms of the exclusion of chlorinated oil EWC codes from Schedule A3, the applicant would agree with the objector that the Licence should at least allow for the possibility for treating such oils and offer a recovery option in Ireland rather than Rilta and others having to export such waste streams.

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