

This Report has been cleared
for submission to the Director by
Programme Manager Frank Clinton.
Signed Ja Date 31/5/10



OFFICE OF CLIMATE,
LICENSING & RESOURCE
USE

ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM

TO:	LAURA BURKE, DIRECTOR
C.C:	Frank Clinton, Programme Manager
FROM:	Bernie Murray, Inspector
DATE:	31st May 2010
RE:	Request for a Technical Amendment to Waste Licence, Register Number W0122-01 , held by Guardian Environmental Services Ltd – Technical Amendment B

Introduction

On 18th December 2001, Silver Lining Industries (Ireland) Ltd., Unit 61 Cookstown Industrial Estate, Belgard Road, Tallaght, Dublin 24, was issued with a licence for the storage and recovery of waste. On the 29th May 2008, the licence was transferred to Guardian Environmental Services Ltd at the same address.

The facility is located in an industrial estate in Tallaght on the outskirts of Dublin. The activities carried out are 'recycling or reclamation of metals and metal compounds', and 'the storage of waste primarily for the above activity'. The recovery plant processes photochemical waste, (from the photo processing industry and other outlets) to recover silver.

The recovered silver sludges, plates and re-useable liquids are sent to the parent plant in Leeds, UK (Silver Lining Industries Limited) for further processing and recovery. Other waste solvents, acids and alkalis are accepted for recovery at the parent plant in Leeds. The Dublin facility is authorised to accept 4,650 tonnes of hazardous (4, 200 tonnes) and non-hazardous (450 tonnes) waste per annum.

Technical Amendment A was issued to Silver Lining Industries (Ireland) Ltd., on 16th January 2006, for the purposes of Section 76(4) of the Waste Management Acts 1996 to 2005.

Details of Request for Technical Amendment

The enforcement inspector has advised that a technical amendment of the licence, Register No. W0122-01, should be carried out under Section 42B(1)(a) and (c) of the Waste Management Acts 1996 to 2010, as a result of two errors in the original licence.

The proposed amendments relate to:

1. Condition 1.5;

Condition 1.5 states that *"Only those categories and quantities as specified in Table E.1.2 of the application and in Article 16(1) reply dated 12th January 2001 shall be accepted at the facility."*

However, the Article 16(1) reply does not contain a list of wastes. Rather, the Article 14(2)(b)(ii) reply dated 10th May 2000 contains a waste list (waste category tables E.1.1, E.1.2 and E.1.3 under - Waste Acceptance and Handling) containing some additional wastes (acids, alkalis) not provided for in the original application. Therefore, Condition 1.5 should make reference to "the Article 14(2)(b)(ii) reply dated 10th May 2000" as opposed to "Article 16(1) reply dated 12th January 2001"

2. Table A.1 of Schedule A

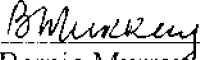
As provided for in a footnote to Table A.1 of Schedule A (Waste categories and Quantities), hazardous waste accepted at the facility is limited to *"Only the materials as specified in Table E.1.2 of the application"*

However, Table E.1.2 of the application does not provide for the acceptance of 120 tonnes each of acids and alkalis. Rather Table E.1.2 of the Article 14(2)(b)(ii) reply dated 10th May 2000 provides for the acceptance of this waste type, therefore, this footnote should be amended to reflect same.

I have received correspondence from the Office of Environmental Enforcement who have confirmed that the requested change cannot be accommodated under the existing licence.

For the reasons outlined above I recommend that the Agency agree to a technical amendment of the Guardian Environmental Services Ltd. Waste Licence (Reg. No. W0122-01) under Section 42B(1)(a) and (c) of the Waste Management Acts 1996 and 2010.

Signed:


Bernie Murray

Inspector

Environmental Licensing Programme

Office of Climate, Licensing & Resource Use