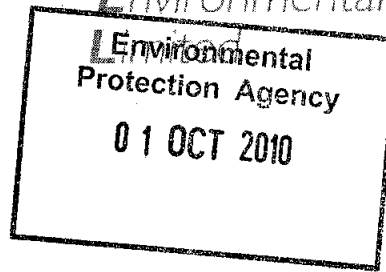


RILTA
Environmental



Environmental Licensing Programme
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
Co. Wexford

September 13th 2010

Your Ref.: W0192-03/gc01ec

Dear Sir/Madam,

We write on foot of a recent audit undertaken by the Office of Environmental Enforcement (OEE), completed on August 4th 2010, which found that more than 5,000 tonnes of non-hazardous waste had been accepted at our facility in 2010 and that this was in contravention of Note 3 of 'Table A.2 Waste Categories and Quantities'. A subsequent OEE audit report identified that we were in non-compliance with Condition 1.2 of the Licence.

These non compliances came as a surprise to us, as it was our understanding that the Licence allowed us to accept more than 5000 tonnes of non-hazardous waste so long as the overall limit of 110,000 tonnes was not exceeded. Furthermore we had accepted more than 5000 tonnes of non-hazardous wastes in 2008 and 2009 and reported these in the AERs, without this being identified as non-compliance. It is important to note that the exceedence of the 5000 tonnes threshold did not result in any new emission source; cause an exceedence to the emission limit values (ELV) set in the Licence, or present any risk of environmental pollution.

We requested the OEE to allow us to vary the amount of non-hazardous waste that could be accepted, as we considered that this was possible under Condition 1.4; however OEE considers that an increase above 5000 tonnes/year cannot be accommodated under the Licence and that we should seek a Technical Amendment.

Requested Amendment

We wish to request a technical amendment to Note 3 of 'Table A.2 Waste Categories and Quantities' to allow for a variation in the quantities of hazardous and non-hazardous waste streams, subject to the overall waste acceptance limits remaining the same.