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Signed: A. Keavey Date: 11/01/2012



OFFICE OF CLIMATE, LICENSING & RESOURCE USE

ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM

TO: DARA LYNOTT, DIRECTOR

C.C: Frank Clinton

FROM: Brian Meaney

DATE: 11 January 2012

RE: Proposal for a Technical Amendment to Waste Licence Register Number **W0054-02** held by **Eco-Safe Systems Limited** in relation to a waste facility at Unit 1A, Allied Industrial Estate, Kylemore Road, Ballyfermot, Dublin 10.

Introduction

Eco-Safe Limited operates a waste disposal and transfer facility for healthcare waste and hazardous waste. The licensee is authorised to recover and dispose of up to 11,357 tonnes of hazardous waste and 500 tonnes of non-hazardous waste per annum. Some 7,332 tonnes of this allowance is made up of healthcare-related wastes – sharps, infectious material, laboratory waste, HEPA filters and mechanical and surgical equipment. A further 4,025 tonnes is made up of more general industrial hazardous waste, including asbestos.

The facility was first licensed on 21 December 1999. A revised licence was issued on 1 August 2003. Technical Amendment A was issued on 20 October 2005 and Technical Amendment B on 9 November 2010.

Details of Request for Technical Amendment

The licensee is seeking amendment to Schedule A of the licence in order to have the flexibility to accept a greater quantity of industrial hazardous waste and less healthcare risk waste. The total quantity permissible under the licence is to stay the same – no increase in overall waste quantities is sought. *Schedule A: Waste Acceptance* of the existing licence is as follows:

Table A.1 Waste Categories and Quantities

WASTE TYPE	MAXIMUM (TONNES PER ANNUM)
Used sharp instruments, Infected or potentially hazardous health care risk waste	7,072

Laboratory waste	
HEPA filters ^{Note 1}	260
Obsolete Mechanical Equipment ^{Note 1}	
Surgical Equipment ^{Note 1}	
TOTAL	7,332

Note 1: These waste types may be treated in the Static Autoclave as detailed in the Commissioning Trials

Table A.2 Other Wastes Acceptable at the Facility

WASTE TYPE	MAXIMUM (TONNES PER ANNUM)
Non-Hazardous Wastes	500 ^{Note 1}
Hazardous Wastes (types as listed in Attachment D3 – Activity 5 of the application form)	4,025
Total	4,525

Note 1: This includes Confidential Records, Bank Records, Insurance Details and Patient Files only.

The proposal is to *take* 5,000 tonnes from the 7,072 tonnes figure in Table A.1 and *add* 5,000 tonnes to the 4,025 tonnes figure in Table A.2. This greater allowance is sought for general hazardous waste due to the growth in commercial arrangements with Veolia, Dee Environmental and Louth County Council. Up to 50% of the waste handled for these customers involves the parking of loaded containers at the facility for 30 minutes or so pending completion of TFS paperwork and ADR/IMDG checks before dispatch to Dublin Port. One of the growing waste streams handled is generated from illegal fuel laundering. (This waste, when discovered, is managed by Louth County Council and passed to the licensee for safe and legal disposal). These waste loads are not unloaded or stored in the transfer station area of the facility.

Eco-Safe state that there are no environmental emissions produced from this activity and there are no discharge points from the storage area. There will be no new waste streams accepted nor will there be any new processes or activities carried out at the facility.

The storage of waste is well conditioned in the existing licence. **Condition 5.1** of the licence states that hazardous waste shall only be stored at appropriately banded locations on the facility. **Condition 5.2.5** of the licence requires the maintenance of detailed procedures for the acceptance, handling and sampling of incoming wastes to include analysis, weighing, documentation, transfer, storage and record keeping.

I recommend accommodating the change sought by Eco-Safe. However given the potential variability in the waste being accepted under the proposed arrangements, it appears appropriate to provide the Agency with the means to monitor, and if necessary, direct, the manner in which waste, including "transient" containerised waste, is stored at the facility. To this end, a new **condition 5.3.6** is recommended.

Recommendation

I recommend amendment of ***Schedule A: Waste Acceptance*** and the insertion of a new condition 5.3.6 as proposed above.

I have consulted with Mr Eamon Merriman of the Office of Environmental Enforcement. The amendment requested by Eco-Safe Systems Ltd cannot be accommodated under the existing licence.

In accordance with section 42B(3) of the Waste Management Acts 1996 to 2011 I have consulted with Ms Rachel Griffiths of Eco-Safe Systems Ltd in relation to the Agency's proposal to amend the licence by way of insertion of a condition not sought by the licensee. The licensee responded to say they had no comment to make on the proposal.

The proposed Technical Amendment C of the licence in accordance with section 42B(1)(c) of the Waste Management Acts 1996 to 2011 will not result in the requirements of section 40(4) of the Acts ceasing to be satisfied.

Signed:



Brian Meaney
Environmental Licensing Programme

