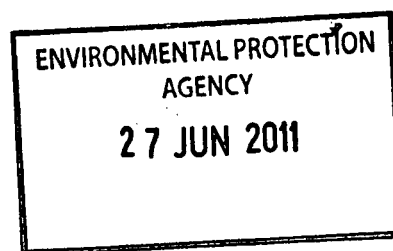




EPA,
Environmental Licensing Programme (ELP),
EPA, P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford



**ECO-SAFE SYSTEMS
WASTE LICENCE: W0054-02
REQUEST FOR TECHNICAL AMMENDEMENT TO SCHEDULE A**

Dear Sir / Madam

Ecosafe Systems wish to apply for a Technical Amendment to redistribute the current licensed tonnage as specified in Schedule A of Licence W0054-02. The request is to reallocate the tonnage between the waste streams detailed in Table A.1 and A.2 of the licence, without exceeding the total licensed quantity.

This request was communicated to the Agency's Office of Environmental Enforcement on 07.04.11 and 10.05.11. A response was received on 13.06.11 advising Ecosafe to apply to the Environmental Licensing Programme for a Technical Amendment and to detail the following information:

- Details of the requested change(s)
- Reasons for the change(s) requested
- Details of any increase or changes in emissions resulting from the change(s)
- An assessment of the likely impacts of any increase/changes in emissions

A copy of this response from the OEE is attached in Appendix 1.

Ecosafe have addressed each of the areas listed above in the attached Technical Amendment Application. The application demonstrates that there will be no significant change to the Licence and therefore request that the change be accommodated through a Technical Amendment.

Yours faithfully,

Rachel Griffith
Environmental Officer

Eco-Safe Systems Ltd.

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Application for Technical Amendment to Waste Licence Register number W0054-02

1. Details of the requested changes

Ecosafe Systems wish to apply for a Technical Amendment to redistribute the current licensed tonnage as specified in Schedule A of Licence W0054-02. The request is to reallocate the tonnage between the waste streams detailed in Table A.1 and A.2 of the licence, without exceeding the total licensed quantity. The Amendment does not involve accepting any new waste types and there will be no change to the activities carried out at the facility. This Amendment is summarised in the tables below.

Table A.1 of Licence W0054-02 Waste Categories and Quantities

Waste Type	Current quantities specified in Licence W0054-02 Tonnes per annum	Requested Amendment Tonnes per annum
Used sharp instruments	7,072	2,072
Infected or potentially hazardous health care risk waste		
Laboratory waste		
HEPA filters	260	260
Obsolete Mechanical Equipment		
Surgical Equipment		
TOTAL	7,332	2,332

Table A.2 of Licence W0054-02 Other Wastes Acceptable at the Facility

Waste Type	Current quantities specified in Licence W0054-02 Tonnes per annum	Requested Amendment Tonnes per annum
Non-Hazardous Wastes	500	500
Hazardous Wastes	4,025	9,025
TOTAL	4,525	9,525

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2. Reasons for the changes requested

Ecosafe have important commercial arrangements with Veolia Environmental, Louth County Council and DEE Environmental. These three customers account for a large volume of waste passing through the transfer station. They have experienced an increase in hazardous waste generation, which in turn increases the tonnage passing through Ecosafe's facility in order to be exported for appropriate disposal.

Nearly 50% of the waste movements from these customers are unique in that their volumes have no impact whatsoever on the facility storage and handling capabilities although they do increase the facility's annual tonnage. The loaded containers arrive at the facility and remain for approximately 30 minutes in order to complete necessary paperwork in accordance with TFS documentation and regulations and carry out ADR/IMDG checks before dispatch to Dublin Port.

In particular, the waste stream from Louth County Council which consists of waste generated from illegal fuel laundering in the Louth region has increased by 50% according to data available from the first quarter of 2011. The current fuel price trends indicate that this waste stream will increase further still in 2011.

Ecosafe are one of the few companies in Ireland that can handle this waste suitably under environmental legislation and ensure that it is handled safely and exported to an appropriate disposal facility. Ecosafe require the requested amendment in order to continue to provide this important service.

3. Details of any increase or changes in emissions resulting from the changes

The activity to which the redistribution relates is Class 13, Third Schedule of the Waste Management Act 1996-2005 (*Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.*) There are no environmental emissions produced as a result of 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 annual licensed tonnage at the facility will not change. Therefore there will be no increase or change in emissions resulting from the requested amendment.

4. An assessment of the likely impacts of any increase/changes in emissions

There will not be any increase/change in emissions and therefore there will be no impact as a result of this amendment. Ecosafe are currently updating the ELRA for the site to reflect a true and up to date assessment of the facility.

Appendix 1

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Office of
Environmental
Enforcement

Regional Inspectorate, McCumskey House,
Richview, Clonskeagh Road,
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Mr John Johnson
Managing Director
Eco-Safe Systems Limited
Unit 1A Allied Industrial Estate
Kylemore Road
Dublin 10

13th June 2010

Our Ref: W0054-02/gc07em

Dear Mr Johnson

I refer to your correspondence dated 10/05/2011 which was received by the Agency on 12/05/2001 in relation to increasing the annual tonnage allowed to be accepted at your facility through Schedule A.2 of waste licence register No. W0054-02.

This proposed change cannot be accommodated under your licence.

A Technical Amendment (Section 42(B) (1) of the Waste Management Acts (WMA)) or a Review of your licence (Section 46(8) of the WMA) will be required to provide for the proposed changes.

To determine if the proposed change can be accommodated by Technical Amendment you should submit the following information to the Agency's Environmental Licensing Programme (ELP), EPA, P.O. Box 3000, Johnstown Castle Estate, Co. Wexford:

- Details of the requested change(s)
- Reasons for the change(s) requested
- Details of any increase or changes in emissions resulting from the change(s)
- An assessment of the likely impacts of any increase/changes in emissions

If the alteration is considered to be a significant change and cannot be accommodated by a Technical Amendment, the ELP will notify you of the process for applying for a Review.

Please quote the above reference in future correspondence in relation to this matter. If you have any queries, please contact Mr. Eamonn Merriman at 01-2680100.

Yours sincerely

Eamonn Merriman
Office of Environmental Enforcement

