

ENVIRONMENTAL PROTECTION  
 AGENCY  
 12 AUG 2011

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

ClearCircle Environmental Company

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11/08/2011

**Your Ref: W0192-03/GC08LM**

Dear Sir/Madam,

I write to request a technical amendment to our waste licence, W0192-03. The amendment would require changes to Condition 8.10 and Schedule C.8 of the Licence and will be detailed below.

Rilta Environmental is currently licensed to accept waste oils detailed in Schedule A3 of the Licence. These oils are re-processed in our waste oil treatment plant to produce an 'end-of-waste' processed fuel-oil product, for use in the asphalt/quarry sector as a replacement for heavy fuel oil, as per Condition 8.10.2 of the Licence. However, the demand for this product has fallen significantly due to the reduction in output from the asphalt sector, attributed in no small part to the down turn in the economy.

Since the grant of Rilta's licence, the UK Environmental Agency's guidance document, 'Quality Protocol for Processed Fuel Oil', has been fully approved in the UK and Northern Ireland. While this guidance document does not have jurisdiction in the Republic of Ireland as such, it is widely recognised to be the most effective and safest end-of-waste criteria available for waste oils and to that end, has been used as a reference document in the setting of a dual standard (one for the asphalt industry and one for general steam-raising boilers) in a similar licensed facility as detailed in Table 1 below (Ref. Schedule G.2 of Technical Amendment B to Waste Licence W0184-01):

**Table 1.**

Parameter	Limit for use in Asphalt Plants (mg/kg)	Limit for use in Steam Raising Boilers (mg/kg, unless otherwise specified)
<b>Cadmium</b>	25	5
<b>Nickel</b>	100	5
<b>Chromium</b>	50	5
<b>Vanadium</b>	100	5
<b>Lead</b>	800	25
<b>Chlorine</b>	3000	-

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<b>Sulphur</b>	10000	-
<b>Ash</b>	15000	-
<b>PCBs</b>	10	5
<b>Sulphated Ash</b>	-	0.2% (m/m)
<b>Total halogens, as chlorine</b>	-	150
<b>Mercury</b>	-	5
<b>Copper</b>	-	40
<b>Zinc</b>	-	300
<b>Arsenic</b>	-	5
<b>Thallium</b>	-	5
<b>Antimony</b>	-	5
<b>Cobalt</b>	-	5
<b>Manganese</b>	-	5

Rilta wishes to adopt the above dual standard in place of the current Schedule C.8. We would also ask that Condition 8.10 be amended to allow re-processed oils to be used as fuel for both the asphalt/quarry sector and more general steam-raising tubed boiler applications. Rilta wishes to adopt these limits and usage criteria as it would allow for a common approach in the Republic of Ireland for the setting of standards for re-processed oils as a fuel.

Rilta would not foresee any increase or changes in emissions arising from this amendment as there will not be any change to the current oil processing regime and any re-processed oils which do not meet the above criteria will be exported to the EU.

I trust this is in order.

Yours sincerely,



Colm Hussey M.Sc.  
Facility Manager  
Rilta Environmental Ltd.