



OFFICE OF CLIMATE, LICENSING &
RESOURCE USE

ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM

TO:	DARA LYNOTT, DIRECTOR
C.C:	Frank Clinton, Programme Manager
FROM:	Brian Meaney, Senior Inspector
DATE:	15 th June 2012
RE:	Proposal for a Technical Amendment to Waste Licence Register Number W0191-03 held by Rilta Environmental Ireland Ltd in relation to a waste facility at Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, County Dublin.

Introduction

Rilta Environmental Ltd operates a hazardous and non-hazardous waste recycling and transfer facility at Rathcoole, Co. Dublin. The licensee is authorised to recover and dispose of up to 106,000 tonnes of hazardous waste (including contaminated soil, interceptor sludges, waste oil, asbestos and others) and 5,000 tonnes of commercial, industrial and C&D waste.

The facility was originally licensed in December 2004 and the licence was revised in June 2007 and July 2010. Technical Amendment A was issued in February 2011.

Details of Request for Technical Amendment

One of the main activities carried on by the licensee is the recovery of waste oil. The treated oil, if it meets a quality standard set down in the licence, can be sold for use in hot mix plants in the asphalt/quarry sector as a substitute for heavy fuel oil. This use of processed waste oil is regulated by condition 8.10.2 of the licence. The demand for this product has declined in recent years and the licensee is seeking a number of amendments to the quality standard in the licence, as follows:

1. Regarding the limits for the material permissible in asphalt plants, the licensee is seeking a relaxation of a number of parameters. This request is proposed for refusal as such a change cannot be accommodated by technical amendment of a licence.
2. The licensee is seeking a new quality standard for the licence, similar to the one granted in Technical Amendment A to W0184-01. This quality standard meets the UK Quality Protocol for Processed Fuel Oil. This request is outlined further below.

Reprocessed fuel oil that meets the UK Quality Protocol for Processed Fuel Oil

Rilta proposes producing reprocessed oil to a standard for use in heat exchange applications such as steam raising boilers. The standard proposed by Rilta is contained in a Quality Protocol published by Wrap and the Environment Agency. The

Quality Protocol was notified to the European Commission and Member States under Directive 98/34/EC as an end-of-waste standard for reprocessed fuel oil. The Quality Protocol dictates the technical standard to be achieved in the manufacture of reprocessed fuel oil and this technical standard is proposed as a new **Schedule B.7** of the licence. However, the Quality Protocol does not place explicit limitations on the downstream use of the reprocessed oil. This is unsatisfactory to the Agency due to concerns that reprocessed fuel oil could be used, in the absence of appropriate controls, in direct heat transfer applications that have the potential to contaminate animal feedstock. The proposed **condition 8.10.3(i)** will restrict the use of this reprocessed oil to non-contact uses for example in raising steam.

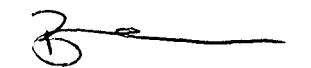
To provide assurance on the destination and appropriate use of reprocessed fuel oil, a "formal supply agreement" arrangement is proposed for Rilta's customers. A formal supply agreement would include a buy-back clause in the event that a customer cannot or does not wish to combust the reprocessed fuel oil. This will avoid the situation whereby a customer will sell on reprocessed fuel oil, perhaps for inappropriate uses. The requirement for a formal supply agreement is proposed in the new **condition 8.10.3(ii)** of the licence.

The existing **Schedule C.8** is proposed for amendment to incorporate the monitoring requirements for reprocessed oil to the Quality Protocol standard.

Recommendation

I recommend amendment of condition 8.10 and Schedules B and C as set out above.

Signed:



Brian Meaney
Environmental Licensing Programme