



OFFICE OF ENVIRONMENTAL SUSTAINABILITY

ENVIRONMENTAL LICENSING PROGRAMME

TO:	Director	
FROM:	Caitríona Collins	Environmental Licensing Programme
DATE:	16 December 2016	
RE:	Technical Amendment to Industrial Emissions Licence Register Number: W0192-03, held by Rilta Environmental Limited, Block 402, Grant Drive, Greenogue Business Park, Rathcoole, County Dublin.	

The Agency received a request on 28 October 2016 from Rilta Environmental Limited, Licence Reg. No. W0192-03 to technically amend their Licence. The request relates to a proposal to operate a bagging and transfer plant at the installation for the management of ash waste residue from the Dublin Waste to Energy installation in Poolbeg.

This memo recommends that the change should not be accommodated by a Technical Amendment, for the reasons set out in the Assessment below.

1. Background

Rilta Environmental Limited (Reg No W0192-03) is authorised for a hazardous waste transfer station located at Block 402, Grant Drive, Greenogue Business Park, Rathcoole, County Dublin and was first authorised on 2 December 2004. Changes to the licence since that time can be summarised as follows:

May 2008	Review of waste licence
July 2010	Review of waste licence
February 2011	Technical Amendment A
June 2012	Technical Amendment B
January 2014	Industrial Emissions Directive amendment

The installation is licenced under the following Classes of the First Schedule to the 1992 EPA Act as amended:

- 11.1 The recovery or disposal of waste in a facility, within the meaning of the Act of 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required.

- 11.2 (b) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment.
- 11.2 (c) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving blending or mixing prior to submission to any other the other activities listed in paragraph 11.2 or 11.3.
- 11.2 (d) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving repackaging prior to submission to any other the other activities listed in paragraph 11.2 or 11.3.
- 11.2 (f) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving recycling or reclamation or inorganic materials other than metal or metal compounds.
- 11.4(a)(ii) Disposal or non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities: physico-chemical treatment
- 11.6 Temporary storage of hazardous waste, (other than waste referred to in paragraph 11.5) pending any of the activities referred to in paragraph 11.2, 11.3, 11.5 or 11.7 with a total capacity exceeding 50 tonnes, other than temporary storage, pending collection, on the site where the waste is generated.

Up to 111,000 tonnes per annum of waste, inclusive of 106,000 tonnes per annum of hazardous waste, is authorised to be accepted at the installation. The types of hazardous waste authorised are as follows:

- Interceptor sludges
- Wastes containing oil
- Aqueous liquid waste containing dangerous substances
- Soil and stones containing dangerous substances
- Insulation materials and construction materials containing asbestos

In 2015, the total waste accepted was 47,793 tonnes of hazardous waste, broken down as follows:

List of Waste Code	Description	Quantity (tonnes)
13 05 03*	Interceptor sludges	1,120
16 07 08*	Waste containing oil	923
16 10 01*	Aqueous liquid waste containing dangerous substances	3,677
17 05 03*	Soil and stones containing dangerous substances	12,672
17 06 01*	Insulation materials and construction materials containing asbestos	138
17 06 05*		5,434
	Other	23,829

2. Technical Amendment request

On the 28 October 2016, the Agency received a request for a Technical Amendment of IE licence W0192-03, in order to allow for the operation of a bagging plant at the installation for the management of 28,000 tonnes per annum of ash waste residue. The licensee has stated that the ash (boiler ash and flue gas treatment residues) will be sourced from the Dublin Waste to Energy installation at Poolbeg (Reg No. W0232-01). These wastes are expected to be classified as hazardous as follows:

19 01 07*	solid waste from gas treatment
19 01 13*	fly ash containing hazardous substances

The proposal includes the installation of three storage silos, a pressure transfer system, two bulk bag loading systems and control measures to prevent fugitive emissions. All loading, bagging and storage is proposed to be undertaken indoors. Measures proposed to prevent fugitive emissions are as follows:

- Automatic shut-off mechanisms, e.g. to prevent over filling of silos
- Dust collector, which empties back into silo
- Sealed bagging system
- Laminated flexible intermediate bulk containers (FIBCs)
- Fast closing doors and loading bay seals
- High vacuum pump in the event of FIBC tear/breach

It is proposed that the bagged ash would be transferred for storage to the other Rilta Environmental installation nearby (Licence Reg No. W0192-03), which is the subject of a separate technical amendment request to accommodate this.

3. Consultation with the Office of Environmental Enforcement (OEE)

I have consulted with the OEE inspector, Rachel Griffith, in relation to this technical amendment request. The OEE confirmed that the licensee had not sought approval for the change under the current licence.

4. Assessment

The acceptance and bagging of 28,000 tonnes per annum of ash waste residue is proposed to be undertaken within the 111,000 tonnes per annum waste acceptance limit specified in Schedule A of the licence.

While the 111,000 tonnes per annum currently authorised includes 106,000 tonnes of hazardous waste, the proposal to accept 28,000 tonnes of ash waste residue changes the nature of the activity at the installation. The proposal includes a bagging facility, whereby the ash is proposed to be pumped into storage silos from where it will be bagged in FIBCs. This proposal constitutes treatment, which is in itself a recovery activity listed as Class 11.4(b)(iii) *treatment of slags and ashes* in the First Schedule of the EPA Acts 1992 as amended.

In addition, a proposal to accept and process 28,000 tonnes of waste would require environmental assessment including, potentially, an Environmental Impact Assessment and

Appropriate Assessment. It is noted that the Rye Water Valley/Carnton SAC (Site Code: 001398) is located approximately 7km north of the installation and the Glenasmole Valley SAC (Site Code: 001209) is located approximately 8km south east of the installation.

The proposal would also require consideration of appropriate environmental monitoring to be included in the licence. A Closure, Restoration and Aftercare Management Plan and Environmental Liabilities Risk Assessment may be required, along with financial provision. The scale and complexity of these considerations can only be facilitated by way of licence review.

Therefore, it is not appropriate that a change of this nature should be authorised by way of technical amendment – a process that does not provide for third party participation. There would likely be third party interest in the proposal and participation in the Agency's decision-making process can only be facilitated by way of licence review.

It is noted in the EIS relating to the Dublin Waste to Energy installation at Poolbeg (Reg No. W0232-01) that the quantity of boiler ash and flue gas treatment residues estimated to be generated is 27,000 tonnes per annum. The proposed 28,000 tonnes of boiler ash and flue gas treatment residues which is the subject of the technical amendment request from Rilta Environmental Limited represents 100% of the total annual boiler ash and flue gas treatment residues estimated to be generated at Poolbeg, which is due to commence firing in February 2017, with commercial waste acceptance anticipated from June 2017.

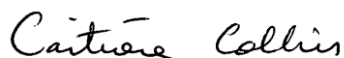
The change requested by the licensee would necessitate a change to *Condition 6 Control and Monitoring* of the licence, which does not currently provide for the necessary controls for the management of ash waste residues at the installation. The licensee has proposed a new condition 6.26 in this regard, along with proposed changes to *Schedule A2 Waste Acceptance* and *Schedule C Control and Monitoring* of the licence.

The request for technical amendment should be refused.

5. Recommendation

I recommend that the Agency refuse the requested technical amendment of licence register number W0192-03.

Signed,



Inspector
Environmental Licensing Programme