



**OFFICE OF ENVIRONMENTAL
SUSTAINABILITY**

ENVIRONMENTAL LICENSING PROGRAMME

TO: Director

FROM: Caitriona Collins Environmental Licensing Programme

DATE: 16 December 2016.

RE: Technical Amendment to Industrial Emissions Licence Register Number: W0185-01, held by Rilta Environmental Limited, Block 14A1, Grant's Road, Greenogue Business Park, Rathcoole, County Dublin.

The Agency received a request on 2 November 2016 from Rilta Environmental Limited, Licence Reg. No. W0185-01 to technically amend their Licence. The request relates to a proposal to operate a storage 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 W0185-01) is authorised for a hazardous waste transfer station located at Block 14A1, Grant's Road, Greenogue Business Park, Rathcoole, County Dublin and was first authorised on 5 May 2004. The licence was transferred from Cedar Resource Management Limited to Rilta Environmental Limited on 9 February 2010. The licence was amended for the purposes of Section 82A (11) of the EPA Acts 1992, as amended, on 7 January 2014 to give effect to the requirements of Directive 2010/75/EU (Industrial Emissions Directive). 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 60,000 tonnes per annum of waste, inclusive of 33,000 tonnes per annum of hazardous waste, is authorised to be accepted at the installation. The types of hazardous waste authorised are as follows:

Waste oil and oil filters	Agrochemical wastes	Hydrocarbon waste
Asbestos	Infectious healthcare waste	Contaminated soil
Oil/sand/other material mixtures	Photographic processing waste	Laboratory waste
Wood preservation waste	WEEE	Contaminated clothing
Wastes from petroleum refining	Batteries and accumulators	Spent carbon
Wastes from inorganic and organic chemical processes	Fluorescent tubes and other mercury containing waste	Paints, inks, adhesives and resins

In 2015, the total waste accepted was 1,332 tonnes, broken down as follows:

List of Waste Code	Description	Quantity (tonnes)
16 02 11*	WEEE	97.74
16 02 13*	Transformers	1,062.51
16 02 14	Redundant Equipment	171.76

2. Technical Amendment request

On the 2 November 2016, the Agency received a request for a Technical Amendment of IE licence W0185-01, in order to allow for the storage and transfer of 28,000 tonnes per annum of bagged ash waste residue at the installation. 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 a pallet racking system to store bagged ash waste residue. The bags will consist of laminated flexible intermediate bulk containers (FIBCs). The licensee states that the FIBCs will be sealed prior to arrival at the installation. It is proposed that the bagging activity is undertaken at the other Rilta Environmental installation nearby (Licence Reg No. W0192-03), which is the subject of a separate technical amendment request.

All storage is proposed to be undertaken indoors. Measures proposed to prevent fugitive emissions are as follows:

- Storage of sealed FIBCs only
- Fast closing doors and loading bay seals
- High vacuum pump in the event of FIBC tear/breach

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 proposed ash storage activity cannot be accommodated under the existing licence.

4. Assessment

The acceptance of 28,000 tonnes per annum of bagged ash waste residue for storage is proposed to be undertaken within the 60,000 tonnes per annum waste acceptance limit specified in Schedule A of the licence.

While the 60,000 tonnes per annum currently authorised includes 33,000 tonnes of hazardous waste, the proposal to accept 28,000 tonnes of ash waste residue changes the nature of the activity at the installation.

In addition, a proposal to accept and store 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/Carton 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 Rilla 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 5 Facility Operations* 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 5.18 in this regard, along with proposed changes to *Schedule A1 Waste Acceptance* and *Schedule D 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 W0185-01.

Signed,

Catherine Collins

Inspector
Environmental Licensing Programme