

Ms Dorota Richards,  
Administration Officer,  
Office of Environmental Sustainability,  
Environmental Protection Agency,  
Headquarters PO Box 3000,  
Johnstown Castle Estate,  
County Wexford.

16<sup>th</sup> November 2017

Re: Application for Licence Reg No: W0185-02

Dear Ms Richards,

I refer the Agency's letter dated 25th September 2017 in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013. On behalf of Rilta, I enclose one original and one hardcopy of the response. Also enclosed are two CD-ROM discs containing files of the application in searchable PDF format. The content of the electronic files is a true copy of the original application form and the supporting attachments.

The EPA's requests are set out in italics followed by the response.

*1. It is stated in section K of the application that an 'updated ELRA and DMP' will be submitted to the Agency following the grant of a revised licence. This is not satisfactory. Therefore in accordance with Section 83.(6) of the EPA Act 1992, as amended*

*a. Prepare a revised, fully detailed and costed Closure, Restoration and Aftercare Management Plan (CRAMP) for the installation as a whole, and to include the proposed new activity – the bagging of air pollution control residues (APCR) and boiler ash. A programme to achieve the CRAMP should include:*

*Details of the long-term supervision, monitoring, control, maintenance and reporting requirements for the restored installation.*

*b. Prepare a fully detailed and costed Environmental Liabilities Risk Assessment (ELRA) which addresses the liabilities and potential liabilities from past and proposed activities, including those liabilities and costs identified in the CRAMP.*

*c. Provide a proposal for financial provision to cover any liabilities associated with the operation and identified in the ELRA and CRAMP.*

*d. Provide evidence that Rilta Environmental Ltd will be in a position to put such financial provision in place in the event that an Industrial Emissions licence is granted and prior to new activities commencing.*

*The preparation of the CRAMP and ELRA and evaluation of the amount and form of financial provision should have regard to EPA guidance including the Guidance on Assessing and Costing Environmental Liabilities (EPA, 2014) and the Guidance on Financial Provision for Environmental Liabilities (EPA, 2015).*

The revised CRAMP and ELRA, which comply with the criteria specified above are in Attachment 1. The proposed financial provision will be similar to that already agreed with the Office of Environmental Enforcement, which is the ELRA costs will be covered by Rilta's insurance policy and a bond will be put in place to cover the CRAMP costs.

*2. It is stated in Attachment E of the application that the primary source of dust emissions will be the bagging of the APCR. It is also state that all the bagging operations will be conducted indoors.*

*a. Please provide a detailed plan on how the fugitive dust generated within the processing building during the bagging operations will be prevented and effectively contained.*

A detailed plan of how dusts will be prevented and contained, during delivery, filling, bagging, storage and dispatch is in Attachment 2. Based on Rilta's recent experience of operating a bagging plant there have been some changes to the dust control measures described in Attachment D1 of the application.

In addition, Rilta has prepared a procedure on the handling of the APCR that identifies the dust prevention and mitigations that apply to the bagging operation. A copy of the procedure is in Attachment 3.

*b. The Emergency Response Plan submitted did not take into consideration the new activity proposed on the licence review application. Please submit an updated emergency response plant that addressed accidental dust blow-outs, fugitive dust and fugitive dust that could arise during delivery, filling, bagging, storage and dispatch operations.*

A revised Emergency Response Plan (ERP) is in Attachment 4.

*In addition to the above, please also provide an updated non-technical summary to reflect the information provided in your reply.*

An updated non-technical summary is in Attachment 5.

  
Jim O' Callaghan

**Attachment 1**

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

## **Attachment 2**

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

## **Attachment 3**

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

## **Attachment 4**

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

## **Attachment 5**

*For inspection purposes only.  
Consent of copyright owner required for any other use.*