

Mr Colm Hussey  
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Reg No: W0185-02

25 September 2017

Dear Mr Hussey

I refer to your application for an Industrial Emissions licence, which was received by the Agency on 31 July 2017.

I am to advise in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, that the following information is required in support of the application under Regulation 9 of the Regulations:

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 site.
  - 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 Limited 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 Environmental Liabilities* (EPA, 2015).

**Note:** Any *telephone enquiries* in relation to the above should be directed to **Dr. Magnus Amajirionwu** at the number above.  
All *written communications and replies* should be directed to Dorota Richards, Office of Environmental Sustainability, EPA, PO Box 3000, Johnstown Castle Estate, County Wexford.



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 stated that all bagging operations will be conducted indoors.
  - a. Please provide a detailed plan on how fugitive dust generated within the processing building during bagging operations will be prevented and effectively contained.
  - b. The Emergency Response Plan submitted did not take into consideration the new activity proposed in the licence review application. Please submit an updated emergency response plan that addresses accidental dust blow-outs and fugitive dust that could arise during delivery, filling, bagging, storage, and despatch operations.

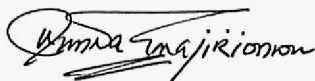
In addition to the above please also provide an updated non-technical summary to reflect the information provided in your reply.

The requested information should be submitted to the Agency within **eight weeks** of the date of this notice, in order to allow the Agency to process and determine your application.

In the circumstances, you should make arrangements to have the required documents (1 signed original and 1 copy in hardcopy format, and 2 copies of all files in electronic searchable PDF format on CD-ROM) submitted to the Agency. Your response to this request should be directed to Dorota Richards, Administration Officer, Office Environmental Sustainability.

It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact Dr. Magnus Amajirionwu at the number above.

Yours sincerely



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**Dr. Magnus Amajirionwu**  
**Environmental Licensing Programme**  
**Office of Environmental Sustainability**

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