



Ms. Joan Fogarty
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"TOTAL HAZARDOUS WASTE MANAGEMENT"

08/09/2015

Dear Joan,

I write to seek the Agency's approval to supply Arigna Fuels Ltd. with reprocessed oil meeting the limits for the 'residual oil equivalent' as set out in Schedule B7 of Waste Licence W0192-03. While we believe this product is an ideal replacement for their current fuel, the Licence does not currently allow its use, and we believe, needlessly so.

Arigna Fuels Limited in Carrick-on-Shannon manufactures a range of solid fuel briquettes from a variety of coal and coke feedstocks and their process requires a liquid fuel for the drying and briquetting steps. The company imports coal and petcoke fines which, as received, may contain up to 20% moisture content which is removed by application of heat. The dried fines are then mixed with an aqueous starch solution and heated by direct firing to 200 °C in the briquetting step. Moisture is again driven off and the starch carbonises to bind the material together in the required ovoid shape. In both heating stages, thermal energy is provided by a liquid fuel firing in direct contact with the coal and coke briquettes. There seems no obvious reason to preclude Rilta's fuel product in such an application and this could allow for the replacement of virgin fuel currently used for this purpose.

However, Condition 8.10.3 (i) states:

Reprocessed oil meeting the criteria set out in column 3 (Limit for a 'residual oil equivalent') of Schedule B.7: Reprocessed Oil Quality Standards Limitations shall be dispatched only for use as a fuel in steam raising boilers. This material shall not be used in direct contact heating/drying applications where the combustion residues become part of any product being produced.

It is our understanding that the second sentence in 8.10.3 would relate to preventing any possible contamination of animal or human crop or feedstuffs that might be contacted by the flue gases during a drying procedure.

However, reprocessed oil that satisfies the 'residual oil equivalent' quality standards may be used without constraint in steam raising units from which all of the products of combustion may be released safely to atmosphere via the flue gas stack. In this case any potential products of combustion would, as a worst case scenario, be contained in the final briquette. We would contend that, as the final product in this case, is also being burned, that any potential environmental contaminants will cause no greater harm than those released from steam raising boilers. It is for this reason that we would contend that there is no significant risk to this proposed use of Rilta's residual oil product.



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www.ClearCircle.com

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E. Ivanoff, R. Sharkey, A. Walsh.

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I would ask that the Agency consider a technical amendment to W0192-03, in order for Condition 8.10.3 (i) to state the following:

Reprocessed oil meeting the criteria set out in column 3 (Limit for a 'residual oil equivalent') of Schedule B.7: Reprocessed Oil Quality Standards Limitations shall be dispatched only for use as a fuel in steam raising boilers, unless otherwise agreed with the Agency.

If you require any further information, please do not hesitate to contact me.

I trust this is in order.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Colm Hussey", is written over the typed name.

Colm Hussey
Facility Manager
Rilta Environmental Ltd.

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