

 <p>epa Environmental Protection Agency <i>An Ghníomhaireacht um Chaomhnú Comhshaoil</i></p>	OFFICE OF ENVIRONMENTAL SUSTAINABILITY
Environmental Licensing Programme Memorandum	
To:	Eimear Cotter, Director
From:	Suzanne Wylde, Inspector, Environmental Licensing Programme
Date:	18 th October 2018
RE:	Request for a Technical Amendment to Waste Licence Register Number W0192-03, held by Rilta Environmental Limited.

Introduction

Rilta Environmental Limited (Reg No W0192-03) is authorised for a hazardous waste transfer station located at Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, County Dublin, Dublin and was first authorised on 22nd July 2010. The licence was amended on 8th February 2011 (Technical Amendment A), on 19th June 2012 (Technical Amendment B) and on 7th January 2014 (to give effect to the requirements of Directive 2010/75/EU, Industrial Emissions Directive).

Request for Technical Amendment

The licensee has requested an amendment to the licence in order to supply Arigna Fuels Ltd with reprocessed oil, meeting the limits for the residual oil equivalent as set out in the licence.

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. It is intended that the reprocessed oil would be used, to apply heat directly, in the manufacture of these solid fuel briquettes.

The licence, as it stands, does not allow for the reprocessed oil to be supplied to Arigna Fuels Ltd. Furthermore, there is insufficient information provided in the submission on the possible health implications of permitting this proposal.

It is further suggested that the company, if still intending to pursue this course of action, engage with the Agency through the Article 28 process as there are a number of 'End of Waste' questions that need to be addressed. Only by engaging in this process can it be concluded that there are no adverse environmental and human health impacts. Once this process is undertaken we may then be in a position to accommodate an amendment.

Consultation with the Office of Environmental Enforcement (OEE)

The OEE advised the licensee and the Environmental Licensing Programme that the request cannot be accommodated under the conditions of the licence. The OEE confirmed that there are no legal proceedings in train in respect of this licence.

Recommendation

I recommend that the requested amendment to provide for the supply of reprocessed oil to a third party fuel manufacturer be refused on the basis of an absence of essential information required to make an informed decision.

I would further recommend that the licensee, if still intending to pursue this course of action, be advised to engage with the Agency through the Article 28 process as there are a number of '*End of Waste*' questions that need to be addressed. Only by engaging in this process can it be concluded that there are no adverse environmental and human health impacts. Once this process is complete the Agency may then be in a position to accommodate an amendment.

Signed

A handwritten signature in black ink, appearing to read 'Suzanne Wylde', written over a horizontal line.

Suzanne Wylde
Environmental Licensing Programme