



Environmental Protection Agency  
An tAidmheireacht um an tAerann agus um an tAerann

OFFICE OF CLIMATE,  
LICENSING & RESOURCE  
USE

**ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM**

**TO:** LAURA BURKE, DIRECTOR

**C.C:** Frank Clinton, Programme Manager

**FROM:** Caroline Connell, Inspector

**DATE:** 10<sup>th</sup> January 2011

**RE:** Request for a Technical Amendment to Waste Licence Register Number **W0192-03**, held by **Rilta Environmental Limited** in relation to a waste facility at **Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, County Dublin.**

### Introduction

Rilta Environmental Ltd., operates an integrated waste management facility at Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, Co. Dublin. Rilta Environmental Ltd., is licensed to accept a maximum of 5,000 tonnes/annum of non-hazardous waste and 106,000 tonnes/annum of hazardous waste at this facility. The licence stipulates that all waste processing must be carried out indoors.

The facility was originally licensed on 2 December 2004 (W0192-01). The licence was first reviewed on 29 May 2008 (W0192-02) in order to accommodate an increase in annual waste throughput and revise emission limit values for emissions to air and water from the facility. The licence was next reviewed on 22 July 2010 (W0192-03) in order to facilitate the setting of a standard for reprocessed fuel oil produced at the facility for use in the asphalt quarry sector as a substitute for heavy fuel oil.

### Details of Request for Technical Amendment

The licensee has requested a technical amendment of waste licence, Register No. W0192-03, under Section 42B of the Waste Management Acts 1996 to 2010.

On 1 October 2010 the Office of Environmental Enforcement (OEE) received correspondence from Mr. Colm Hussey (Facility and Environmental Manager) on behalf of Rilta Environmental Ltd. The licensee stated that this correspondence was on foot of an audit undertaken by the OEE on 4 August 2010 which found that the conditions of the current licence had been breached as more than 5,000 tonnes of non-hazardous waste had been accepted at the facility in 2010.

The licensee had understood that they were licensed to accept more than 5,000 tonnes/annum of non-hazardous waste provided that the overall limit of 111,000 tonnes/annum was not exceeded.

The licensee subsequently requested a technical amendment to *Schedule A.2: Waste Acceptance, Table A.2* (Note 3) that would allow for a variation in the quantities of hazardous and non-hazardous waste streams accepted at the facility, subject to the overall waste acceptance limits remaining the same.

### **OEE Consultation**

I received correspondence from the OEE on 19 October 2010 confirming that the request for the proposed change when originally submitted to the OEE was refused on the grounds that it could not be accommodated under the terms of the licence and that “...OEE has no objection to the requested amendment...”

### **Discussion**

*Table A.1: Waste Categories and Quantities* (Note 1), of the first waste licence, register number W0192-01, specified that “*The quantities of the individual waste types may be adjusted, only with the agreement of the Agency, subject to the total annual waste quantity remaining the same*”. This note applied to both non-hazardous and hazardous waste streams.

*Table A.2: Waste Categories and Quantities*, of waste licence W0192-02 (Note 2 & 3) specified that the limitation on individual hazardous and non-hazardous waste types may be varied with the agreement of the Agency subject to the individual total limits for non-hazardous and hazardous waste staying the same, an amended level of control over that previously authorised. The inspector’s report for W0192-02 does not comment on the change, which was carried forward to the more recent review and grant of licence register number W0192-03.

The licensee confirmed that planning permission for the site specifies a waste acceptance limit of 111,000 tonnes/annum and doesn’t differentiate between hazardous and non-hazardous waste streams.

The licensee stated that in the most recent licence application (W0192-03), the non-hazardous EWC codes submitted reflected an intake of 30% of the overall waste tonnage. The current waste licence allows for approximately 4.7% acceptance of non-hazardous waste.

Since 2006 four complaints have been received by the Agency in relation to this facility. These complaints were in relation to odour emissions. Seven non-compliances have been noted by the Agency between 2006 and 2010. These non-compliances were for unapproved alterations/modifications to the activity, non-notification of incidents, exceedence of licensed waste quantity, waste management and documentation and procedures. An exceedence of emission limit values for emissions to sewer was also recorded.

The licensee has requested a licence amendment to allow a variation in the quantities of hazardous and non-hazardous waste streams accepted at the facility, subject to the overall waste acceptance limits remaining the same. I recommend the following amendments:

- Existing Table A.2, Note 3 “*The limitation on individual hazardous and non-hazardous waste types may be varied with the agreement of the Agency subject to*

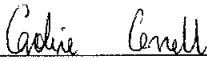
*the individual total limits for non-hazardous and hazardous waste staying the same”.*

- Amend as follows: *“The limitation on individual hazardous and non-hazardous waste types may be varied with the agreement of the Agency subject to the total annual waste quantity remaining the same”.*

### **Recommendation**

For the reasons outlined above I recommend that the Agency agree to a technical amendment of the Rilta Environmental Ltd., Block 402, Grant’s Drive, Greenogue Business Park, Rathcoole, Co. Dublin Waste Licence (Reg. No. W0192-03) under Section 42B(1)(c) of the Waste Management Acts 1996 and 2010.

Signed:

  
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Caroline Connell

Inspector

Environmental Licensing Programme

Office of Climate, Licensing & Resource Use