



GOVERNMENT OFFICE OF  
SZABOLCS-SZATMÁR-BEREG COUNTY  
Nyíregyháza District Office

File number: 3345-18/2019  
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Subject: Waste Management Permit for  
ReMat Hulladékhasznosító Zrt.  
Reference number: -  
Annex: -

DECISION

The Division of Environmental Protection and Nature Conservation (hereinafter Division)

*grants permit to*

ReMat Hulladékhasznosító Zrt. (hereinafter Licensee) /3580 Tiszaújváros, TVK Ipartelep, premises: 4465 Rakamaz, Arany J u. 108/A (Rakamaz, TLN 247/7), Central Statistical Office identification code: 13749097-2016-114-05, KÜJ: 101 897 387, KTJ: 100 607 393/ to collect, prepare (pre-treat before recycling) and recycle non-hazardous wastes specified in Section I of the Decision subject to the following conditions:

I) Non-hazardous wastes that can be collected, prepared (pre-treat before recycling) and recycled include:

Waste Identification Code (WIC)	Description	Quantity (tons/year)
07	Wastes from organic chemical processes	
07 02	Wastes from the MFSU of plastics, synthetic rubber and man-made fibres	
07 02 13	waste plastic	1,000
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified	
15 01	Packaging (including separately collected municipal packaging waste)	
15 01 02	plastic packaging waste	9,000
19	Wastes from waste management facilities, off-site wastewater treatment plants and the preparation of water intended for human consumption and water for industrial use	
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 04	plastic and rubber	1,000
	Total:	11,000

Code and method of the preparation before recycling:

E02 - 04 compaction, baling, balling (e.g. agglomeration, regranulation);

E02 - 06 sorting according to material quality (grading);

*DEPARTMENT OF WASTE MANAGEMENT, NOISE AND VIBRATION PROTECTION OF  
DIVISION OF ENVIRONMENTAL PROTECTION AND NATURE CONSERVATION*

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Code and method of the recycling:

R3 – Reclamation/recycling of organic substances which are not used as solvents (including composting and other biological transformation processes as well as gasification and pyrolysis, provided that in case of the latter ingredients are used as chemicals)

II Delimitation of the activity:

For collection, pre-treatment and utilisation of non-hazardous wastes specified in Section I:

- Licensee's premises at Rakamaz, Arany J u. 108/A (Rakamaz, TLN 247/7)

III The technology used to collect, prepare (pre-treat before recycling) and recycle non-hazardous wastes is as follows:

Collection and pre-treatment of wastes:

Pre-sorted and baled wastes are supplied to the premises by companies having valid waste transportation licences. ReMat Zrt does not perform waste transportation activity. In most cases wastes are supplied to the premises after they have been weighed by the supplier; if any waste arrives without weighing, its weight is determined by the scale available on the premises of Rakamazi Növénytermesztő Kft under a contract.

Incoming wastes are separated by type and stored on the site in a covered warehouse that is closed on three sides and has a paved floor plus in an open area in front of the finished product warehouse. In the open storage area wastes are stored on pallets. Wastes are transported by fork-lift trucks from the the storage area to the place of processing. The shift leader grades plastic wastes having been prepared for processing and orders to convey them to production equipment, and any foreign matter is removed at the conveyor that feeds the waste into a wet grinder. During the wet grinding process coloured plastic films are sorted out at the conveyor then pressed in bales and transported to the Company's premises in Tiszaújváros.

Any incoming bales that cannot be processed by means of the technology used in Rakamaz will be transported to the premises in Tiszaújváros.

Steps of the waste recycling process are as follows:

- aqueous grinding, washing, drying;

The homogenous baled material, without preliminary sorting, is placed on the conveyor of the wet grinder. When the operator detects any plastic waste not belonging to the type of material being processed he removes it and, after having been compacted, it is shipped away.

The conveyor feeds the homogenous film waste into the wet grinder where it is shredded and pre-washed. Waste film chips are conveyed from here through a friction washer to a washing tank where plastic chips and sludge impurities are separated on the basis of the difference in their specific gravities. Wet chips are transferred into a press then to the drying system (the energy requirement of the heating cylinder is 20 kW). Dry waste film chips are conveyed from the drying equipment into temporary storage cages or to the regranulating machine.

- Regranulation

Waste plastic chips are conveyed through a pipeline from the drying system to the conveyor of the regranulating equipment then to the pre-agglomerating unit where chips are cut, mixed and heated (to 102°C - 106°C). Crushed and pre-heated chips are conveyed from here into the cylinder of the extruder where they are melted at a temperature of 230°C to 240°C and the plastic is degassed. The screw presses the melt through the metal sieve of the melt filter and the granulating head, and the melt strips leaving the head are cut by a rotating knife into granules. After drying recycled plastic granules are filled into bags through a filling and weighing system.

- Dry grinding

It is suitable for processing plastic wastes other than waste film (PP, PE, PS production waste, pallets, boxes, trays, crates and bottles). In the grinder a push plate pushes the material to be ground to a rotary knife which cuts the material into pieces. Granules fall from the rotor space into a tank through a screening grate then are filled into bags or big-bags.

- Packaging

Regranulates are filled into containers with flexible walls, big-bags (or bags) then these are transferred to the warehouse where their net weights are checked by weighing and adjusted if necessary.

Chips are filled into big-bags beside the grinder. Unit loads are composed from the bags in a way that bags are put onto pallets and covered with shrink hoods and a "Product Accompanying Sheet" is affixed to the side of shrink-wrapped each load.

Packaged goods and unit loads will remain (with a minimum rest period of 24 hours) in the finished goods warehouse until final inspection.

- Final inspection

Machine operators take sample from each pallet of LDPE, LLDPE and HDPE products prepared for shipment and measure MFI (Melt Flow Index) of the samples and will keep them for 3 months after the date of removal from storage.

The "Product Accompanying Sheet" affixed to each unit load or big-bag proves that the products have undergone quality control and met quality requirements and conformity of packaging and creating unit loads, and finished goods are transferred to the finished goods warehouse and stored until shipment.

During Company's activity both non-hazardous and hazardous wastes are generated. The Company collects hazardous wastes generated during its activity at the collection point in the plant of the company, and the Operating Regulations of the collection point has been approved by the Division in

its decision no. 8760-3/2019. Non-hazardous wastes generated are collected at the collection point in the plant until they are shipped from the premises.

#### IV Available personnel, technical equipment and financial instruments:

financial assets:

- coverage certificate
- environmental impairment liability insurance

personnel:

- environmental protection officer
- site and production manager
- shift leaders
- material handlers
- material preparation workers
- machine-minders
- machine operators
- waste sorting and processing workers
- waste purchasers

equipment:

- baling equipment
- regranulating equipment
- grinder (GS 400/600)
- washing equipment (grinder/washer/dryer)
- forklift-trucks
- weighing on another site (60 ton scale) under a contract

#### V. General rules to be observed when carrying out waste management activity

1 Every activity should be planned and performed so that the environment is affected to the smallest possible extent, the burden on and use of the environment is reduced without causing any environmental hazard or pollution, ensuring that waste generation is prevented, the amount and hazardousness of waste generated is reduced, wastes are recycled and disposed of in an environmentally sound manner.

2 Any waste management activity should be carried out without endangering human health and causing damage to the environment, posing risk to environmental compartments, without giving rise to noise and odour (exceeding the limits) that disturb the community and affecting adversely the landscape and protected natural and cultural values.

3 The waste owner shall ensure compliance with waste treatment regulations through the following procedures:

- pre-treatment, recycling or disposal procedures conducted by some equipment or in a waste management facility operated by the waste owner,
- transfer of waste to a waste treatment plant,
- transfer of waste to a waste transporter,
- transfer of waste to a waste collector,
- transfer of waste to a waste mediator,
- transfer of waste to an intermediary organization engaged in waste management,
- transfer of waste to a dealer,
- transfer of waste to a public service operator including when waste is handed over at the waste collection point or at a waste facility
- transfer of waste in a place where wastes are received or to an organization obliged to receive wastes.

4 When waste is handed over to another party, with the exception of transferring waste within the scope of waste management public services, the waste owner shall make sure that the receiver is in possession of a waste management permit to transport, mediate, trade with and treat the waste concerned or its registration needed for the waste management activity concerned has been made.

5 In case of equipment malfunction or when a harmful event occurs, Licensee shall eliminate damages in accordance with the disaster management plan, notify competent authorities and ensure restoration of original conditions.

6 The insurance contract for remedying environmental damages shall be maintained during the term of validity of the licence.

7 When any change occurs in Licensee's data not involved in its waste management activity but included in the licence, the permit holder shall report the change to the environmental authority within 15 days of its occurrence. The permit holder shall report any change affecting the waste management activity in advance. On the basis of the announcement the environmental authority will modify the permit.

8 Licensee shall report the cessation or completion of the waste management activity to the environmental authority at least 30 days before the activity is ceased or completed.

9 Licensee shall report in writing that it has become obliged to supply data or, when its activity has been altered or ceased, its obligation to supply data has changed or ceased to the environmental authority within 15 days of emergence or cessation of obligation.

10 The party obliged to provide data shall be responsible for the completeness of data provided when fulfilling its data supply obligation and for compliance with accounting rules and statistical system requirements related to the party and for consistency between its own recording systems and measurement and monitoring data.

## VI Special rules for collecting, preparing (pre-treat before recycling) and recycling wastes:

1 Licensee may only perform waste collection, pre-treatment and recycling activities on the basis of the technological descriptions included in Section III.

2 The quantity of non-hazardous waste that can be stored on Licensee's premises at the same time must not exceed the capacity of all collection facilities established on the premises. The quantity of waste that can be stored on the premises at the same time is 1,545 tons.

3 Licensee may store assets used for the waste management activity on only its premises at Rakamaz, Arany J u. 108/A.

4 For non-hazardous waste Licensee shall retain records and certificates for 5 years.

5 Non-hazardous wastes subject to recovery may be stored for a maximum of 1 year, including pre-treatment period, from collection to recovery.

6 Licensee shall keep up-to-date records, for each site and type of waste, of wastes generated during its own activity, taken over from or transferred to other organizations or treated by the Licensee, and shall provide data on collection, pre-treatment and recovery of non-hazardous wastes on data sheets "HIR-ÉV-főlap, HIR-ÉV-2 and HIR-ÉV-3" or electronically via electronic forms completed by using the General Form Completion Program every year, until 1<sup>st</sup> of March in the year following the reference year.

Licensee shall provide data on wastes generated during its own activity on data sheets "HIR-ÉV-főlap and HIR-ÉV-1" every year, until 1<sup>st</sup> of March in the year following the reference year.

## VII Rules to be observed during operation of the non-hazardous waste storage facility:

1 The nature and type of wastes stored at the waste storage facility should be indicated unambiguously in a readable manner at the place of storage, posting clearly visible and awareness raising signs.

2 The conditions of spaces used for storage (including especially road and other pavements) should be inspected regularly and repaired if necessary, in accordance with the Operating Regulations.

3 Upon storage, free and unobstructed access to the waste should be ensured at all times.

4 The operator of the waste storage facility shall ensure that the operation lives up to best available techniques.

5 The operator of the waste storage facility shall keep up-to-date records of wastes stored at the waste storage facility.

## VIII Conditions for abandoning the waste management activity

1 Pursuant to Section V/3 of the Decision, before abandoning the activity Licensee shall make arrangements for treating the wastes received or generated during its activity.

2 Licensee shall restore any alterations to the environment as a consequence of its waste management activity.

3 After the activity has been ceased, Licensee shall report the cessation of its obligation to provide data on waste management.

## IX Provision for supervisory fee

Licensee carries out a waste management activity that requires a permit therefore it shall pay an annual supervisory fee.

The amount of the fee is HUF 40,000 that is forty thousand forints for each site (including branches and the seat/headquarters in the absence of sites). From 2022 Licensee shall transfer the total amount of the supervisory fee for the reference year until 28<sup>th</sup> of February in the reference year to the appropriation allocation fund account no. 10044001-00299695-00000000 kept with the Hungarian State Treasury of the Government Office of Szabolcs-Szatmár County.

In case of late payment a penalty for belated payment is payable.

The Client has paid the supervisory fee for 2019.

## X. Environmental health requirements

- Pursuant to NM Decree No. 18/1998. (VI. 3.) *on epidemiological measures to be taken to prevent infectious diseases and epidemics* employees must have been vaccinated as required and shall have valid medical certificates.
- Workplace exposures that endanger employee's health and safety should be assessed in accordance with a separate law, and in order to reduce the risk of occupational diseases employer shall, in accordance with a separate law, provide vaccination for workers who are exposed to hazard, as a precondition for employment.
- During operation the provisions of SZCSM - EÜM Joint Decree No. 3/2002.(II. 8.) *on minimum health and safety requirements of workplaces* should be observed, a black and white locker room should be provided for the workers, cleaning and washing of work cloths and regular cleaning and disinfection of the machines and equipment used to treat waste should be solved in central manner.
- A well-stocked first aid kit should be kept at the workplace.
- Pest (insect and rodent) control should be done on the premises as needed but at least twice a year.
- For activities carried out with hazardous substances and preparations on the premises the provisions of Act XXV of 2000 *on chemical safety* and EüM Decree No. 44/2000. (XII. 27.)

which have been amended a number of times should be observed (preparing and revising a risk assessment).

- For the protection of non-smokers provisions of Act XLII of 1999 *on the protection of non-smokers and certain regulations on the consumption and distribution of tobacco products* and of Government Decree No. 39/2013 (II.14.) *on the production, placing on the market and control of tobacco products, on combined warnings, and the detailed provisions on the application of healthcare penalties* must be complied with.
- When carrying out the activity, the rules set out in Act CLXXXV of 2012 *on wastes* and in EMMI Decree 13/2017 (IV.12.) *on public health requirements related to municipal solid and liquid wastes* should be followed.

#### XI Competent authority:

Concerning the premises of ReMat Hulladékhasznosító Zrt. (3580 Tiszaújváros, TVK Ipartelep) at 4465 Rakamaz, Arany J u. 108/A, in its authority statement no. 36500/6899-1/2019 ált. the Disaster Management Directorate of Szabolcs-Szatmár County has given its consent to the extension of the validity period and modification of the permit to collect, pre-treat and recycle non-hazardous waste with provisos. The requirements of the authority statements are as follows:

- 1 For the operation of the water facilities on the premises the instructions set out in the applicable and valid water rights operation permit must be strictly followed.
- 2 When discharging wastewaters into public sewers, relevant limit values specified in Annex 4 of KvVM Decree No. 28/2004 (XII.25.) shall be respected for all water quality characteristics, out of the limit values of pollutants of wastewaters that can be discharged into public sewers those which apply to discharging wastewater indirectly into other receiver should be taken into account.
- 3 In order to protect good quality conditions of groundwater, for the activities carried out on the premises and for discharging rainwater provisions of Government Decree No. 219/2004. (VII.21.) *on the protection of groundwater* must be fully observed.
- 4 The activity should be performed without polluting or harming the environment, preventing soil and groundwater contamination, so that the activity does not cause any deterioration in the conditions of groundwater and geological formation which exceeds the contamination limits (B) specified in the appendices of KvVM-EüM-FVM Joint Decree No. 6/2009. (IV. 14.) *on limits required for the protection of groundwater and geological formation against contamination and measuring contaminations*.
- 5 For infiltrating rainwater on the premises it must be ensured that in the area used for infiltration the deterioration in the conditions of groundwater and geological formation must not exceed the contamination limits (B) specified in the appendices of KvVM-EüM-FVM Joint Decree No. 6/2009. (IV. 14.).



6 When operating and maintaining machineries and transport vehicles used for carrying out the planned activity fuel and lubricant should be prevented from getting onto ground or into surface water and groundwater. In order to avoid pollutions, regular inspections and necessary maintenance work should be performed at a place dedicated exclusively for this purpose with adequate technical protection.

7 Wastes from which contamination can leak out and can deteriorate the quality of groundwater can be stored in a covered area with adequate technical protection.

8 In any unpaved area only such wastes can be stored which or their converted product contaminations do not leak out and seep into groundwater, leading to the deterioration thereof.

This authority statement is not subject to an independent appeal; it can be contested in a legal remedy against the decision adopted in the case or against the decision on terminating the procedure.

During the procedure an administrative service fee incurred and became payable for the licensing procedure as a procedural fee which is to be borne by the Licensee. The amount of the administrative service fee for the licensing procedure is HUF 355,000 that has been paid by the client. No other procedural costs have arisen.

The Division has established that interlocutory decision no. 3345-4/2019 has no legal effect because a decision has been made in the case within the administrative time limit.

Provided that the requirements are met, this decision will remain valid from the date when it becomes final to 15 November 2024.

This decision becomes final on the 15<sup>th</sup> day after the day of its notification if no request for legal remedy against the decision is received.

The waste management permit included in decision no. 121-8/2015 shall be repealed on the day that this decision becomes final.

An appeal lies against this Decision which should be addressed to the Department of Environmental Protection and Conservation of the Government Office of Pest County but submitted to the District Administration Office within 15 days of notification. An appeal may only be lodged against the contested decision for reasons directly related to the content thereof or by referring to a grievance or damaged party's interest directly stemming from the decision. The appeal must be accompanied with reasons. In the appeal you may only refer to such a new fact of which the party was unaware in the first-instance procedure or did not referred to that due to circumstances beyond its control.

The appeal is subject to a fee whose amount is 50 percent of the fee of this licensing procedure, i.e. HUF 177,500. When an appeal is lodged, the fee of the appeal procedure shall be paid to bank account no. 10044001-00299695-00000000 kept with the Hungarian State Treasury of the

Government Office of Szabolcs-Szatmár County at the time the appeal is lodged. The following information should be indicated in the transfer notice box: designation “Division of Environmental Protection and Nature Conservation” and the case number of the decision.

Based on the appeal the Division may decide to modify or withdraw the decision or submit it to the Government Office of Pest County.

## REASONING

On 22 October 2019 ReMat Hulladékhasznosító Zrt. (3580 Tiszaújváros, TVK Ipartelep) lodged an application to the Division and requested to extend and modify its waste management permit no. 121-8/2015 to collect, pre-treat and recycle non-hazardous wastes on its premises at 4465 Rakamaz, Arany J u. 108/A.

On the basis of Paragraph (1) of Section 43 of Act CL of 2016 *on general public administration procedures* [hereinafter GPAP], within 8 days of the start date of the procedure the Division passed, in accordance with this Section, interlocutory decision no. 3345-4/2019 that has no legal effect because the Division passed a decision on the case within the administrative time limit, i.e. before 16 December 2019.

ReMat Hulladékhasznosító Zrt. (3580 Tiszaújváros, TVK Ipartelep) which submitted the application has received a copy of the interlocutory decision.

After the application has been submitted, in its letter no. 3345-5/2019 the Division informed the other right-holders on the premises (at Rakamaz, TLN 247/7) on the submission of the application and requested them to make a declaration whether the case affects their rights or legitimate interests directly.

The right-holders have not made a declaration within the specified time limit or up to this day therefore the Division presumed that the case does not affect their rights or legitimate interests directly thus they are not classified as clients, and the Division has not sent any other documents to them in the present proceeding.

Concerning the application the Division has established that pursuant to Sections 4.6, 5, 7 and 37 of Annex 1 of FM Decree No. 14/2015. (III. 31.) *on administrative service fees for environmental protection and nature protection procedures* the procedure is subject to an administrative procedure fee.

The amount of the fee is HUF 355,000 that has been paid by the client at the request of the Division included in decision no. 3345-6/2019. No other procedural costs have arisen.

According to Paragraph (1) of Section 129 of GPAP: “The authority will determine the amount of the procedural cost and decide who should bear the cost and on possible reimbursement of advanced costs.”

Pursuant to Paragraph (1) of Section 1 of Government Decree No. 469/2017 (XII.28.) *on procedural costs, payment for access to files, reimbursement of payment of costs and legal aid* the administrative service fee is procedural cost that has been paid by the client during the procedure.

Attached to the application, Licensee submitted a documentation compiled by itself, in accordance with Paragraph (1) of Section 7 and Paragraph (1) of Section 9 of Government Decree No. 439/2012.

(XII. 29.) *on the registration and authorization of waste management activities*, for recycling non-hazardous wastes.

The following documents and declarations were annexed to the application for waste management permit: a copy of the certificate proving the qualifications of the environmental protection officer, copies of employment contracts, an extract from the trade register, the previous waste management permit, a contract for using the scale, a title deed, a copy of the map of the property, a permit for the premises, an organizational chart, a contract for medical care, a technological process flow diagram, a material balance, a decision on registering the activity requiring registration, a declaration on participation in the database of taxpayers without unpaid public duties, a declaration on its previous waste management activity, a financial report, an environmental insurance policy, a declaration on cessation of waste status, a declaration on the possibility of employing groups which are disadvantaged in the labour market, operating regulations of the waste storage facility, technical specifications and a disaster management plan.

The submitted application was incomplete, thus in its decision no. 3345-6/2019 the Division requested the Licensee to complete the application, regarding “E” pre-treatment codes, clarification of pre-treatment and recycling technologies, operating regulations for the collection point of hazardous wastes generated, the method of collecting non-hazardous wastes, the amount of wastes that can be collected at the same time, maintenance of environmental insurance, the financial coverage, updating of the disaster management plan and the declaration made on changes in the construction and operation of the waste storage facility.

In the document submitted on 7 November 2019 Licensee fulfilled the request for completion, but to make a decision additional clarification was required therefore in its decision no. 3345-1/2019 the Division requested further completion.

In its decision no. 3345-1/2019 the Division requested Licensee to clarify pre-treatment and recycling technologies and associated treatment codes and quantities, indication of the dry grinding operation in the table of capacity calculation, and requested Licensee to verify the quantity of waste that can be stored simultaneously with calculations.

In the document submitted on 14 November 2019 Licensee fulfilled the request for further completion.

In its decision no. 121-8/2015 the Division issued a waste management permit to ReMat Hulladékhasznosító Zrt. (hereinafter Licensee) /for its premises located at 4465 Rakamaz, Arany J u. 108/A and, at the same time, approved the Operating Instructions for the non-hazardous waste collection point established on the premises.

When the validity period of decision no. 121-8/2015 containing the waste management permit expires, the approval of the Operating Instructions for the non-hazardous waste collection point included in the decision will remain valid because it was granted for an unlimited period of time, provided that conditions will remain unchanged.

According to Licensee declaration received on 7 November 2019 no changes have occurred in the construction and operating conditions of the waste collection point therefore in the procedure lunched ex officio for transparency the approval was issued in decision no. 8640-1/2019. At the same time, this provision was deleted from decision no. 121-8/2015.

To issue the permit, in accordance with Points 62 and 63 of Table 19 of Annex No.1 of Government Decree No. 531/2017. (XII. 29.) *on designation of authorities acting on the ground of imperative reasons on the basis of certain public interests* and referring to Section 55 of GPAP, in its document no. 3345-8/2019 the Division requested the competent authority, the Disaster Management Directorate of Szabolcs-Szatmár County to express its position in the licensing procedure.

In its document no. 3345-7/2019 the Division requested the Public Health Department of the Authority Division of the Nyíregyháza District Office of Szabolcs-Szatmár County to examine the professional issue set out in Point 2 of Table I of Annex of Section 31 of Government Decree No. 71/2015 (III.30.) *on the appointment of public administrative authorities of environmental and nature protection* (hereinafter the Decree) and to express its position.

In its document no. 3345-10/2019 the Division requested the Mining Department of the Authority Division of the Nyíregyháza District Office of Szabolcs-Szatmár County to examine the professional issue set out in Point 3 of Table I of Annex 8 of Section 31 of the Decree and to express its position.

In its document no. 3345-9/2019 the Division, referring to Paragraph (1) of Section 25 of GPAP, requested the Town Clerk of Rakamaz to inform, within 8 days, the Division whether the waste management activity affects any protected natural area of local importance and to make its authority statement, pursuant to Point 64 of Table 19 of Annex No.1 of Government Decree No. 531/2017. (XII. 29.), if the answer was yes.

In its authority statement no. 36500/6899-1/2019 the Disaster Management Directorate of Szabolcs-Szatmár County has consented to extend and modify waste management permit no. 121-8/2015 to collect, pre-treat and recycle non-hazardous wastes on the premises of ReMat Hulladékhasznosító Zrt. (3580 Tiszaújváros, TVK Ipartelep) at 4465 Rakamaz, Arany J u. 108/A with provisos.

Point XI of the operative part includes the Directorate's requirements.

The authority statement is justified by the following:

Under Points 62 and 63 of Table 19 of Annex No.1 of Government Decree No. 531/2017. (XII. 29.) the tasks of the Disaster Management Directorate include:

- "To judge whether the requirements specified in the law and in the decision for the protection of surface waters and underwater have been complied with (acting in its capacity as water protection authority)"
- "To judge whether water supply needed for the activity, discharge of rainwater and wastewater produced and treatment of wastewater have been ensured, the requirements specified in the law and in the decision for the protection area and hydrogeological protective zones of water

resources are met, and examining the effect exerted on water runoff and passage of flood and ice (acting in its capacity as water management authority)”

On the basis of the application and annexed documents and available data, the Disaster Management Directorate has examined the professional issue set out in Points 62 and 63 of Table 19 of Annex No.1 of Government Decree No. 531/2017. (XII. 29.) and established the following facts relating to the premises located at 4465 Rakamaz, Arany J u. 108/A:

- ReMat Hulladékhasznosító Zrt. (3580 Tiszaújváros, TVK Ipartelep) as environment user is in possession of waste management permit no. 121-8/2015 issued for the premises located at 4465 Rakamaz, Arany J u. 108/A
- For the time being, ReMat Hulladékhasznosító Zrt. collects, pre-treats and recycles wastes whose maximum recoverable material content is 11,000 tons/year. At the end of the process regranulates and plastic chips, as plastic raw materials, are obtained.
- Normally pre-sorted and baled non-hazardous wastes are delivered to the site by authorized specialized companies. ReMat Zrt does not carry out waste transportation activity.
- Wastes are stored in a covered storage facility that is closed on three sides, separated by type. In the open storage area wastes are stored on pallets.
- Raw materials are transported by fork-lift trucks from the storage area to the place of processing.
- Water supply to the site is solved by a connection to the utility network.
- Wastewaters (washing water) coming from the technology used to wash non-hazardous plastic packaging wastes received on the premises and the sewage from welfare facilities are transferred into a public sewer operated by Nyírségvíz Zrt. through a wastewater lifting unit on the basis of receipt declaration no. 687-2014.
- Rainwater leaves the site at four points and all outlets are connected to the infiltration ditch in front of the property.
- ReMat Hulladékhasznosító Zrt. (3580 Tiszaújváros, TVK Ipartelep) as Licensee is in possession of Water-use Permit for Facility Operation no. 615-1/2014 (VKSZ number: 27/260-2012, modified by decision no. 615-11/2014 and will remain valid until 31 January 2024) issued for the water facilities to discharge wastewater generated and rainwater collected on the premises located in the area with TLN Rakamaz 247/7.
- On the basis of available information and documents the planned activity will not endanger the water resources of the public waterworks.
- In accordance with Section 7 and Annex No. 2 of Government Decree No. 219/2004. (VII. 21.) *on the protection of groundwater* and pursuant to Government Decree No. 24/2004 (XII.25.) *on classification of settlements located in areas sensitive to the conditions of underwater*, in terms of underwater conditions Rakamaz Town is located in an area that is highly sensitive with regard to protection of the quality of underwater.
- The activity does not affect passage of flood and ice and the maintenance of the river bed.
- If the aforementioned rules are followed, the activity meets the requirements for protection of underwater.

In the light of the foregoing it can be ascertained that the planned activity poses no risk to surface water and underwater resources when the provisions of the operative part are observed, operating instructions are followed and order in the technological process is maintained, and the requirements specified in Government Decree No. 220/2004. (VII. 21.) *on the rules for protection of surface waters* and Government Decree No. 219/2004. (VII. 21.) *on protection of groundwater* can be met.

Under Paragraph (1) of Section 66/A of Act LIII of 1995 *on the general rules of environmental protection* (hereinafter EPA /Environmental Protection Act/) and Paragraph (3a) of Section 10 of Government Decree No. 223/2014. (IX. 4.) *on the appointment of public administration offices and authorities of water management and protection against damages caused by water* [hereinafter Government Decree No. 223/2014. (IX. 4.)] in the administrative procedure for licensing an activity involving use of the environment the Directorate, acting in its capacity as water protection authority, has examined compliance with water protection regulations as part of environmental regulations.

Paragraph (2) of Section 66/A of EPA stipulates that the authority does not give its consent to the activity if it would harm or pose a risk to any compartment of the environment including surface waters and groundwater.

In view of the above, in this procedure the Directorate, in order to ensure compliance with water protection regulations, has examined compliance with the provisions of Government Decree No. 221/2004. (VII. 21.) *on certain rules for catchment management* and in Government Decision No. 1155/2016 (II.31.) *on the revised catchment management plan for 2015 in Hungary*, in addition to the general provisions of EPA.

The Waste Management Directorate, as competent authority, has issued its authority statement in accordance with Paragraph (1) of Section 1 of Government Decree No. 72/1996. (V.22.) *on water rights and duties of the water authority* as amended, concerning issues set out in Points 62 and 63 of Table 19 of Annex No.1 of Government Decree No. 531/2017. (XII. 29.) *on designation of authorities acting on the ground of imperative reasons on the basis of certain public interests*, on the basis of Section 55 of Act CL of 2016 *on general public administration procedures* [hereinafter GPAP], in the form specified in Section 80 and with a content corresponding to Section 81.

The sphere of authority of the Waste Management Directorate of Szabolcs-Szatmár County is determined by Paragraph (1) of Section 1 of Government Decree No. 72/1996. (V.22.) *on water rights and duties of the water authority* and by Point 7 of Paragraph (1) of Section 10 of Government Decree No. 223/2014. (IX. 4.) *on the appointment of public administration offices and authorities of water management and protection against damages caused by water*, and its competence is determined by Point 7 of Annex 2 of the same Government Decree.

Pursuant to Section 2 of Government Decree No. 531/2017. (XII. 29.) *on designation of authorities acting on the ground of imperative reasons on the basis of certain public interest* the Waste Management Directorate shall make its authority statement within 15 days of receipt of the request.

The Directorate provided information on the right to appeal with regard to Paragraph (1) of Section 116 of GPAP.

Having regard to Paragraph (1) of Section 85 of GPAP, the Directorate requested the Division to forward the decision to the Waste Management Authority.

Based on the documents received, in its statement no. SZ-10/NEO/06255-2/2019 The Public Health Department of the Authority Division of the Nyíregyháza District Office of Szabolcs-Szatmár County has given its consent to modify waste management permit of ReMat Hulladékhasznosító Zrt. (3580 Tiszaújváros, TVK Ipartelep) to collect, pre-treat and recycle non-hazardous wastes and to extend the validity period thereof with provisos, regarding environmental health issues which fall within the scope of its competence.

The provisos are included in Point X of the Decision.

The environmental health issues which fall within the scope of its competence include:

- assessment of health hazards and potential impacts,
- preventing the spread of infectious diseases,
- insect and rodent control,
- examination of activities performed with hazardous preparations,
- ensuring compliance with public health and epidemic prevention requirements relating to solid municipal waste

and the examination to be performed by the Department is regulated by the following acts and decrees:

- NM Decree No. 18/1998 (VI.3.) *on disease control measures required to prevent infectious diseases and epidemics,*
- SZCSM - EÜM Joint Decree No. 3/2002.(II. 8.) *on minimum health and safety requirements of workplaces,*
- Act XXV of 2000 *on chemical safety* and its implementing regulations,
- Act CLXXXC of 2012 *on wastes,*
- EMMI Decree 13/2017 (IV.12.) *on public health requirements related to wastes that fall within the scope of public waste management services,*
- Act XLII of 1999 *on the protection of non-smokers and certain regulations on the consumption and distribution of tobacco products,*
- Government Decree No. 39/2013 (II.14.) *on the production, placing on the market and control of tobacco products, on combined warnings, and the detailed provisions on the application of healthcare penalties.*

As regards detailed instructions for protecting against pests, Pursuant to Paragraph (1) of Section 36 of NM Decree No. 18/1998. (VI. 3.) *on epidemiological measures to be taken to prevent infectious diseases and epidemics* measures should be taken to prevent establishment and spread of insects and other arthropods (hereinafter insects) and rodents and other pests (hereinafter jointly referred to as pests)

which spread diseases or are harmful from the point of view of health and to prevent their harm and keep them away and to kill them regularly (hereinafter jointly referred to as protection).

In accordance with Paragraph (1) of Section 39 of NM Decree No. 18/1998. (VI. 3.) the professional guidelines for the protection, applicable pesticides and methods and the duties of district offices and governments offices are set out in “*Information on approved pesticides and professional guidelines for protecting against pests*” periodically issued by the Chief Medical Officer of the State.

Instructions for protecting against pests shall be governed by Annex No. 4.

The provisions stipulated in Sections 36 and 39 of NM Decree No. 18/1998. (VI. 3.) and Annex No. 4 referred to above should be observed, and according to the rules set out therein disinsection should be carried out against the pests identified in the Decree as needed but at least twice a year in municipal and solid waste treatment plants.

Under Paragraph (1) of Section 9 of NM Decree No. 18/1998. (VI. 3.) cited repeatedly above which regulates vaccination obligation related to various jobs, employers shall assess biological exposures which compromise employees’ health and safety in accordance with a separate law (EüM Decree No. 61/1999 (XII.1.) *on protecting health of employees exposed to the impact of biological factors.*)

To mitigate the risk of establishment, as a precondition for employment, in accordance with a separate law employers shall provide vaccination for workers who are exposed to hazards.

At employers’ request the District Office will provide information on the results of the assessment of dangerous jobs.

- Rules for activities carried out with hazardous substances and preparations are set out in Act XXV of 2000 *on chemical safety* and its implementing regulations.
- Pursuant to Act XXV of 2000 a (chemical) risk assessment should be carried out and revised or rewritten as required or at the specified time in accordance with Section 19 of the Act.
- Section 15 of Act XXV of 2000 shall apply to closed storage of substances and mixtures used for the activity.
- Concerning smoking, provisions of Act XLII of 1999 *on the protection of non-smokers and certain regulations on the consumption and distribution of tobacco products* should be observed, according to which:  
with the exception of designated smoking areas – save as otherwise provided for in Paragraph (3) - smoking is prohibited and it is forbidden to use electronic cigarettes and other electronic devices that mimic real cigarettes.

In view of the legal reasons and facts set out above, the Department made a decision as described in the operative part.

Pursuant to Section 112 of Act CL of 2016 *on general public administration procedures* [hereinafter GPAP] an independent appeal lies against the decision of the authority.



An independent appeal lies against the decision of the authority if the Law permits it; otherwise remedies shall be exercisable against the Decision or, in the absence of the decision, against the decision that terminates the procedure.

The sphere of authority of the Department is determined by Point 2 of Table I of Annex No. 8 of Government Decree No. 71/2015 (III.30.) *on the appointment of public administrative authorities of environmental and nature protection*, and its competence is determined by Point a) of Paragraph (1) of Section 16 of Act XL of 2016 and Sections 4 and 5 and Annex No. 2 of Government Decree No. 385/2016 (XII.2.) *on accomplishing public health tasks of the capital and county government offices and district offices and on appointment of the National Public Health Centre*.

In its letter whose subject is the examination of professional issue no. BO/15/2417-2/2019 the Mining Department of the Authority Division of Borsod-Abaúj-Zemplén County made the following findings:

Based on Paragraph (2) of Section 31 of Government Decree No. 71/2015 (III.30.) *on the appointment of public administrative authorities of environmental and nature protection* and on Point 3 of Table I of Annex No. 8 the Department has established that on the premises located at Rakamaz TLN 147/7, i.e. in the area affected by the activity, there is neither mining site nor mining operation with approved technical operation plan, and there are no mineral raw material deposits that have been revealed or have industrial stock and are included in the Inventory of Minerals and Geothermal Energy, and the activity will probably not affect any geology-related or mining administration activity.

In the light of the above, regarding examination of professional issues specified in Paragraph (2) of Section 31 and Point 3 of Table I of Annex No. 8 of Government Decree No. 71/2015 (III.30.) the extension of the term of the waste management permit does not require specification of any further condition or requirement.

In its decision no. 1/1231-9/2019 the Town Clerk of Rakamaz has established lack of competence and terminated the procedure considering that on the basis of the documentation and the town's Municipal Regulation no. 28/2005 (XII.02.) *KT on approval of local building regulations and the development plan* (hereinafter Regulations) he has ascertained that on the territory of Rakamaz Town the premises and adjacent areas are not protected nature conservation areas of local importance and there are no nature conservation requirements in the Regulations which apply to that area. He established lack of competence on the basis of the Regulations and Section 17 and Point c) of Paragraph (1) of Section 47 of Act CL of 2016.

For its activity Licensee has conducted the preliminary procedure specified in Government Decree No. 314/2005. (XII. 25.) *regarding the procedures of environmental impact assessment and the single procedure of authorization of utilization of the environment* (hereinafter Authorization Decree) , and with its decision no. 10484-15/2013 the Division had taken a decision in the case. On the basis of the preliminary documentation submitted in the preliminary examination procedure the

Division ascertained that no significant environmental impact resulting from the activity carried out on the premises at 4465 Rakamaz, Arany J u. 108/A (Rakamaz, TLN 247/7) to recycle non-hazardous waste can be assumed, and the activity does not fall within the scope of IPPC licensing process either. Before starting the activity, a waste management (collection, transport, pre-treatment before recovery and recycling) permit belonging to the competence of the division should be obtained and then noise level limit should be determined.

Please be informed that pursuant to Point 130 of Annex No. 3 of the Authorization Decree a preliminary examination is required if the activity or the facility is modified significantly according to Subpoint ab) of Point a) of Paragraph 2 of Section 2 of the Authorization Decree, except when the modification is the implementation of the activity or facility specified in Columns B and C of Annex No. 1, therefore the applicant has to conduct a repeated preliminary examination in case of such a significant modification.

The Division has examined the application and its completion and established that the content of the application has met the requirements set out in Paragraph (1) of Section 7 and Paragraph (1) of Section 9 of Government Decree No. 439/2012. (XII. 29.) *on the registration and authorization of waste management activities*, and, if the requirements specified in the operative part are complied with, the activity can be carried out in a manner that does not pose any threat to the environment, and the activities producing waste included in the permit and the waste management comply with general and specific rules and basic principles for wastes, therefore the Division has granted a permit to collect, prepare (pre-treat before recycling) and recycle non-hazardous wastes specified in Section I of the operative part of the Decision.

In its decision no. 8640-1/2019 the Division has approved the Operating Regulations of the non-hazardous waste storage facility established at Rakamaz TLN 217/7, and specified requirements for the operation of the waste storage facility in Section VII of this Decision.

Under Paragraph (3) of Section 82/A of Act CLXXXV of 2012 *on wastes* [hereinafter Waste Act], supervisory fee shall be paid for each site as specified by the Division in Section IX of the operative part of the Decision.

The Client paid the supervisory fee for 2019 for the premises at Rakamaz TLN 217/7 on 26 February 2019 therefore in the operative part of the Decision the Division obliged the Client to pay supervisory fee from 2020.

The Division has determined the validity period of the permit in accordance with Paragraph (1) of Section 79 of the Waste Act.

The Division informs ReMat Hulladékhasznosító Zrt. as Licensee in possession of a waste management permit that under Paragraph (3) of Section 80 of the Waste Act Licensee was registered simultaneously with the issuance of the permit.

The Division has adopted the Decision in accordance with Paragraph (2) of Point (1) d) of Section 9 of Government Decree No. 71/2015 (III.30.) *on the appointment of public administrative authorities of environmental and nature protection*, and Sections 7, 9, 10 and 11 of Government Decree No. 439/2012. (XII. 29.) *on the registration and authorization of waste management activities*, pursuant to Paragraph (1) of Section and Paragraph (1) of Section 80 of the Waste Act, considering the provisions of S 4, P (1) of S 6, P (2) of S 12, P (2) of S 15, P (1), P (2) and P (5) of S 31 and P (1) and (P) 3 of S 82/A of the Waste Act and Paragraphs (1) and (2) of Section 14 of Government Decree No. 439/2012. (XII. 29.) *on the registration and authorization of waste management activities* and of P (1) and P (2) of S 3, S 4, P (1) and P (2a) of S 6, P (1a) and P (2) of S 7, P (1b) of S 10, P (1), P (2) and P (5) of S 11, (P) 1 and Points a), b) and c) of P (2), Point a) of (P) 4 of Section 12 and P (1) and P (2) of S 13 of Government Decree No. 309/2014. (XII. 11.) *on the registration and data provision obligations that are connected to waste*.

In Section VII of the operative part of the Decision the Division set specification for the operation of the non-hazardous waste storage facility in accordance with Sections 18 to 21 of Government Decree No. 246/2014. (IX. 29.) *concerning the creation and operation of certain waste management facilities*.

The Division has provided for the payment of subsidiary fee in Section IX of the operative part in accordance with Section 82/A of the Waste Act. In case of late payment Section 35 of GPAP provides for payment of default interest. The Division ensured the possibility of judicial review and specified the time limit allowed according to Paragraphs (1) and (2) of Section 116 and Paragraphs (1) to (3) of Section 118 of GPAP.

The Division has provided for the appeal fee pursuant to Paragraph (5) of Section 2 and Sections 4.6, 5, 7 and 37 of Annex 1 of FM Decree No. 14/2015. (III. 31.) and for the procedural fee according to Section 125 and Paragraph (1) of Section 128 of GPAP.

The sphere of authority of the Division is determined by Point (1) d) of Paragraph (2) of Section 9 of Government Decree No. 71/2015 (III.30.) *on the appointment of public administrative authorities of environmental and nature protection* and its competence is determined by Paragraph (1) of Section 8/A and Paragraph (2) of Section 11 of the same Decree.

Wastes were classified into code numbers according to VM Decree No. 72/2013. (VIII. 27.) *on the waste list*.

This decision was sent to the County Disaster Management Directorate in accordance with Paragraph (4) of Section 31 of Government Decree No. 71/2015 (III.30.).

Nyíregyháza, 26 November 2019

for and on behalf of  
Dr. Ildikó Galambos Head of Office

Tamás Szalontai Head of Department

Cc: according to the List



GOVERNMENT OFFICE OF  
SZABOLCS-SZATMÁR-BEREG-COUNTY  
Nyíregyháza District Office

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