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Submission No. 2



Noeleen Keavey
Environmental Licensing Programme
Office of Environmental Sustainability
EPA Head Quarters, PO Box 3000
Johnstown Castel Estate
Co. Wexford
Y35 W821

Registered Post

Dear Ms Keavey,

Iarnród Éireann are in receipt of your correspondence dated the 27/01/2016 regarding the EPA's review of the Industrial Licence held by Enva Ireland Ltd in relation to their facility located at Clonminam Industrial Estate, Portlaoise, County Laois.

Since 2007 Iarnród Éireann have engaged with ENVA Ireland on several occasions in relation to the migration of odours and dust onto the Iarnród Éireann Portlaoise Rail & Sleeper Depot located adjacent to the Enva Plant. Iarnród Éireann have previously communicated to management at ENVA Ireland Ltd that Iarnród Éireann staff working at the Depot are experiencing a reduced quality of workplace well being and general annoyance as a result of nuisance odours which are migrating from the ENVA plant onto our property (REF: attached letter Iarnród Éireann – ENVA 10/10/14).

Iarnród Éireann have also previously made it known to the management of ENVA Ireland that the open shed area at the northern end of their property where soil remediation takes place has on several occasions generated significant amounts of dust during dry weather conditions which has settled on the depot's specialised plant and machinery resulting in increased machinery maintenance and potentially reducing the equipment's lifespan.

In a letter dated 31st October 2014, ENVA Ireland proposed to enclose the processing area of their soil remediation building (REF: attached Letter ENVA - Iarnród Éireann 31/10/14 and 09/02/16); and whilst I understand that planning permission was granted for this during 2015, no work on this has taken place to date.

In the same letters ENVA Ireland outlined their intention to trial an odour abatement system on their site in an effort to reduce the nuisance odour emanating from their facility. It should be noted that nuisance odours are still being reported by Iarnród Éireann staff at Portlaoise on a regular basis.

Therefore, it is imperative that Iarnród Éireann's submissions outlined below are incorporated into any future industrial licence issued to ENVA Ireland for their facility at Clonminam, Portlaoise:

- Item 1: The processing area of the soil remediation building at the ENVA plant at Clonminam, Portlaoise is completely enclosed as outlined in letters from ENVA to Iarnród Éireann dated 31/10/14 and 09/02/16, within 3 – 6 months.
- Item 2: The implementation of an effective odour abatement system at the ENVA plant at Clonminam, as outlined in letters from ENVA to Iarnród Éireann dated 31/10/14 and 09/02/16, within 3 – 6 months.
- Item 3: That measures are put in place to ensure emissions from the ENVA plant at Clonminam do not exceed any statutory limits regarding ambient air quality at any time.
- Item 4: That no harmful emissions are discharged from the ENVA plant at Clonminam into the surrounding areas at any time.
- Item 5: The continuance of any licence is dependent upon the success of the control measures outlined in Items 1, 2, 3 and 4.

Iarnród Éireann would be interested to understand how the implementation of these and other control measures will in the future be monitored to ensure compliance is maintained in accordance with the requirements of the appropriate regulatory authorities.

Iarnród Éireann would ask that the licence outlines provisions for accountability for ENVA in relation to dealing with environmental complaints in a timely and efficient manner.

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Iarnród Éireann would also like to point out that staff at the Rail & Sleeper depot in Portlaoise will continue to record occurrences of dust and odour's on air quality log sheets as and when these occurrences arise. These logs can be made available to the EPA at any time in the future should they be required.

Yours Sincerely

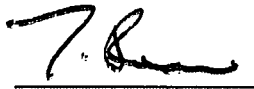


Tom Ruane
Infrastructure Production Manager

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If ENVA fail to respond to our concerns, we will be obliged to report this issue to the Office of Environmental Enforcement and the Health and Safety Authority. In the meantime we will continue to record dust and odour issues in our internal air quality log and officially record formal health and safety complaints within our safety management system as evidence of the ongoing EHS issues caused by ENVA's activities on IE property at Old Knockmay Rd Portlaoise.

Yours Sincerely



Tom Ruane,
Production Manager,
Iarnród Éireann Infrastructure,
New Works Building,
C.I.E Works,
Inchicore,
Dublin 8.

CC, Éamonn Ballance, Chief Civil Engineer, Iarnród Éireann Infrastructure

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Mr Tom Ruane
 Production Manager,
 Iarnrod Eireann Infrastructure,
 New Works Building,
 C.I.E. Works,
 Inchicore,
 Dublin 8.

31st October 2014

Re: your letter of 10th October 2014

Dear Mr Ruane,

I refer to your letter regarding the 'Migration of dust and nuisance odours' onto the Irish Rail site in Portlaoise. I can reassure you that we do take any such concerns seriously and endeavour to be a good and responsible neighbour. As you have correctly noted Enva does indeed carry out regular occupational and air quality monitoring at our site here in Portlaoise and such monitoring has not indicated there to be any significant issue in relation to dust or indeed odours. However we do accept that there may be occasions when a temporary nuisance issue with regard to odour or dust can arise from our site. As such we are proposing to react to the concerns raised and implement the necessary measures to prevent the occurrence of dust or odour issues from our site.

Since receipt of your letter we have engaged with a UK based company (APPS UK Ltd.) who specialise in the suppression of both dust and odours. A technical representative from the company has also visited our site to understand and assess the issues that may present in relation to the potential generation of dust and odour. Subsequent to the site visit the company have presented some preliminary proposals for the provision of dust & odour abatement reagents and application equipment which need further evaluation. In addition we are also assessing if it is possible to modify our existing dust suppression vehicle so that it could be used to apply the products being recommended by APPS UK.

During the winter months it is less likely that any significant dust issue will arise due to the wetter weather. As such the winter months may provide an opportunity to refine the necessary design, carry out any trials if necessary and then purchase the necessary equipment before the summer when dust generation is more likely. We have already obtained an odour abatement reagent from APPS UK and have on loan a delivery system for trialling at our site.

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Enva Ireland Limited (The Enva)

a DCC company

Registered No: 307186, VAT No: IE 6327186A

Clerrinam Industrial Estate, Portlaoise, Co. Laois, Republic of Ireland

Directors: D. Ryan (Chairman), T. Rosen (Dir.), G. Kelly (Dir.), P. Keogh (Dir.), A. Fitzpatrick (Dir.), A. Mulvaney (Dir.), J. McNamee (Co. Secretary), G. Kelly



Approved by the Environmental Protection Agency (EPA)



Mr Tom Ruane
 Production Manager,
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 New Works Building,
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February 9th 2016

Re: Dust & Odour Nuisance

Dear Mr Ruane,

Further to my letter of October 2014 I would like to update you on the progress we have made in respect of the issues you had raised to me regarding potential dust and odour.

I would like to reassure you that we are committed to applying the highest possible standards to the operation of our Portlaoise facility. Enva has been an integral part of the Portlaoise community for over 30 years and is a responsible company, processing the majority of waste oils collected in Ireland into high quality fuel products.

In relation to the potential for dust migration from the Enva site, subsequent to renting a mobile dust suppression unit on a trial basis from the specialist company (APPS UK) we have since proceeded to purchase the unit for use on our site as necessary. Furthermore in 2015 we obtained planning permission to better enclose the soil remediation area and works have already commenced to complete these works (with an expected completion date of the 4th of March 2016).

Enva is not the only source of odours in the local area, however, Enva does accept that there is the potential for odours to be generated on occasion due to its processing of waste oils. In particular, the final stage of the production process where we remove the remaining excess water from the oil using heat has been identified as having a significant potential to create odours in the local area. This part of the process has now been suspended.

However, other than odours, Enva is not aware of any air quality monitoring results that have shown any air quality parameter to be exceeding its relevant guideline value. The EPA has conducted air quality monitoring in the vicinity of the plant, the results of which have shown there not to be any exceedances of guideline values.

In response to the matter Enva has submitted a proposal to the EPA to install an odour abatement system (to capture emissions from the oil drying process) at a cost of approximately €1 million. Enva is engaged with the EPA so as to obtain approval to

Enva Ireland Limited (Enva)
 a DCC company
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 Clerinnam Industrial Estate, Portlaoise, Co. Laois, Republic of Ireland, R32 XD95
 Directors: T. Walsh (Managing), T. Beane, J. Davy, S. Dick, G. Kelly, A. Fitzpatrick





install the system, a thermal oxidiser, which is recognised as the most effective odour abatement technology available.

We are fully committed to making sure that we at Enva Ireland can fulfil an important role in safeguarding the environment without impacting on the welfare of our neighbours. The EPA has initiated a review of our licence and we intend to work closely with them in completing this process. In the interim, the company is implementing a range of measures to ensure that there are no nuisance odours created by the continued operation of the facility.

I hope this clarifies the matter sufficiently for you and we would welcome the opportunity to meet with you regarding your concern, alternatively please do not hesitate to contact myself or Gareth Kelly (C.O.O.) should you wish to clarify or discuss the matter further.

Yours sincerely

A handwritten signature in black ink, appearing to read "Anne Fitzpatrick". The signature is written in a cursive style and is positioned above a horizontal line.

Anne Fitzpatrick
Director

Cc: Jim Donovan (Irish Rail, Portlaoise)

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