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## MEMORANDUM

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**TO:** Members of the Board  
**FROM:** Technical Committee  
**DATE:** 13 January 2004  
**RE:** Objection to Proposed Determination for AHP Manufacturing B.V. t/a Wyeth  
Nutritionals Ireland

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Application Details	
Classes of activity	7.2 –The manufacture of dairy products where the processing capacity exceeds 50 million gallons of milk equivalent per year 2.2 – The burning of any fuel in a boiler or furnace with a nominal heat output exceeding 50MW.
Location of activity	Askeaton, Co. Limerick
Licence application received:	10 July 2003
Proposed Determination issued:	10 December 2003
Third party objection:	None
First party objection:	06 January 2004

### Company

Wyeth Nutritionals Ireland is part of the American Home Products Group (AHP) and was established in Askeaton in 1973. The company were granted a licence in October 2000 in respect of Class 7.2 and the proposal to build a CHP plant required them to apply for a new licence.

### Consideration of the Objections

This report considers all of the issues raised in the Objection and this report details the TC's comments (Marie O'Connor (Chair) and Niamh O'Donoghue) and recommendations following the examination of the objections together with discussions with the inspector, Sean O'Donoghue.

### First Party Objection

The applicant makes 4 points of objection.

#### 1. Condition 3 Interpretation

*The applicant requests that an oxygen reference is inserted for the CHP plant*

#### Comment:

The TC recommend that this is inserted to facilitate the interpretation of the emissions from the CHP plant.

<b>Recommendation:</b>
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Insert Condition 3.2.3 to read as follows:
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In the case of CHP and Bypass gases (Gas Turbine)

(i) Temperature 273K, Pressure 101.3kPa, dry gas; 15% oxygen for liquid and gas fuels

## 2. Schedule 1(i) Emissions to Atmosphere .

The applicant requests that the emission limit values be applicable to the By-Pass Stack (A2-7) as specified in Table 12A(ii) of the IPCL application.

### Comment:

The By-Pass stack would be used in the event that there was reduced requirement for steam on-site or where the Waste Heat Recovery boiler was under maintenance. In this event the TC recommend that emission limit values are applied to the By-Pass Stack as requested in the objection. As monitoring is bi-annually it should be carried out on the CHP Boiler Stack and therefore no modification to the other schedules is proposed.

**Recommendation:** Amend Condition 3.1.3 to read as follows:

Amend Schedule 1(i) Emissions to Atmosphere as follows:

**Emission Point Reference No.:** *A1-1 and A2-7*

**Location:** *CHP Boiler Stack and By-Pass Stack*

## 3. Schedule 1(i) CHP Boiler

The applicant requests an ELV of  $450\text{mg}/\text{m}^3$  (TC assuming refers to nitrogen oxides as  $\text{NO}_2$ ) when operating the CHP on gas oil.

### Comment:

The TC noted that the modelling of the emissions from the boilers used an ELV of  $320\text{mg}/\text{m}^3$   $\text{NO}_x$  as the worst case scenario and that this when modelled gave a 99.8%ile GLC of  $198\mu\text{g}/\text{m}^3$   $\text{NO}_2$  (Air Quality Standard 99.8%ile is  $200\mu\text{g}/\text{m}^3$ ). However, it is expected that the plant will only operate using gas oil for the purposes of testing (approx. 2 x 90mins per annum) and for extreme circumstances of gas outage. The TC therefore propose that operation of the CHP on gas oil is catered for but limits its operation to less than 20 hours per annum to minimise the impact on the air quality.

**Recommendation:**

Amend Schedule 1(i) Emissions to Atmosphere as follows:

Insert the following line in Table 1 (Emission Point A1-1 and A2-7)

**Nitrogen oxides (as  $\text{NO}_2$ )**<sup>Note 1</sup> *450mg/m<sup>3</sup>*

Insert note at end of Table

**Note 1:** *This emission limit value applies only when using Gas oil during system test or emergency supply and not exceeding 20 hours per annum in total.*

## 4. Schedule 2(ii) Effluent Treatment Control

The applicant states that they 'currently measure flow at the ETP outfall and not at the SBR outflow' and request that the location for monitoring is amended.

### Comment:

The TC accept that monitoring at the ETP (Effluent Treatment Plant) outflow is adequate for control purposes but recommend that a map be submitted to the Agency showing the location of all the monitoring and sampling points for the purposes of enforcement. In addition the TC recommends that a typographical error is corrected to accurately describe the emission point.

**Recommendation:**

Amend Schedule 2(ii) Effluent Treatment Control as follows:

Amend 1<sup>st</sup> line to read

*Emission Point Reference No.:*                      **SWI**

Amend Table 1 Monitoring as follows:

Replace Line 8 Column 1 **SBR outflow** with **ETP outflow**

Amend Condition 11.4 to read as follows:

*Monitoring and analysis equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge. The licensee shall submit to the Agency within three months of date of grant of licence an updated drawing showing the location and Reference no. of all monitoring and emission points specified in the licence. The licensee shall maintain a copy of this drawing on-site at all times.*

Insert following line to Schedule 5(i) Once-off Reports

*Monitoring and Emissions Drawing*                      **Within three months of date of grant of licence**

**Overall Recommendation**

It is recommended that the Board of the Agency grant a licence to the applicant

- (i) for the reasons outlined in the proposed determination and
- (ii) subject to the conditions and reasons for same in the Proposed Determination,  
and
- (iii) subject to the amendments proposed in this report.

Signed

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Marie O'Connor

for and on behalf of the Technical Committee