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Date  
27 March, 2003

Our ref.  
167-1

Your ref.

re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

Dear Ms Burke,

I am to refer to the above referenced application for a waste licence relating to a facility at Indaver Ireland, Waste Management Facility, Carranstown, Duleek, Co Meath. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 and Article 13 of the Waste Management (Licensing) Regulations.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed below:

## ARTICLE 12 COMPLIANCE REQUIREMENTS

### A1 Non-Technical Summary

1. Provide details in the non-technical summary of the licence application relating to financial provision.

### B Waste Activities

1. Clarify if it is your intention to proceed with the civic waste facility (community recycling park.).

### D Waste to Energy Plant

1. In relation to the Waste to Energy plant and requirements of best available techniques (BAT), provide details of alternatives considered specifically in relation to furnace type and gas cleaning.
2. Clarify whether metal recovery prior to incineration has been considered and provide details on why it is not proposed at this facility.



## **E2 Proposed Waste Types**

1. In relation to the waste to energy plant, clarify if it is the intention to accept sewage and industrial sludges.

## **H1 Air**

1. Provide completed Tables 1.1 Air Emissions and 1.2 Air Emissions Characterisation for the back-up generator (emission point reference A2.1 given in Attachment H1.4, Drawing No. 2666-22-DR-009). Provide details on any emissions and the impact of such emissions on the environment from operating this generator. Provide details on the monitoring of any such emissions from this generator.
2. The maximum air volume to be discharged from emission point reference A1.1 appears to be listed differently in different sections of the application (i.e. Table 1.1 lists 232,237 m<sup>3</sup>/h; Section D2.1, p.50 lists 142,000 Nm<sup>3</sup>/h; Section D2.1, p.21 lists 2 x 63,000 Nm<sup>3</sup>/h; Table 1.5 of H2.1, p.16 lists 126,000 Nm<sup>3</sup>/h typical and 150,980 Nm<sup>3</sup>/h maximum). Please reconcile these figures and confirm that the dispersion modelling used the correct value.
3. The Cumulative Impact Assessment in Section H1.2 was carried out for NO<sub>2</sub> and SO<sub>2</sub>. This should also be carried out for particulate and for dioxins.
4. An assessment of the annual average impact of SO<sub>2</sub> from emission point reference A1.1 should be included in Section H1.2.
5. Please indicate what reference 28 refers to on p. 8 of 35 of Appendix 1.2 of Section H1.2.
6. The impact assessment in Section H4.1 refers to maximum annual ground level concentrations inconsistent with the air dispersion modelling. This assessment should be redone with the correct values used. Specific reference should be made in this assessment to potential impacts on pNHAs, SACs [flora and fauna] etc already identified.
7. Provide details on heat emissions, including source, location, nature, composition, quantity, level and rate; the impact of such emissions on the environment; and details on the monitoring of any such emissions.

## **L3 Financial Provision**

1. Provide information to show compliance with section 40(7)(c) of the Waste Management Act of 1996. This information should include the following:
  - a) The two most recent years audited accounts;
  - b) A copy of business plan for the company (or relevant parts thereof) including income and expenditure projections with particular reference to the facility at Carranstown, Duleek;
  - c) The manner by which funds will be available for site development, operation, closure, and restoration;
  - d) A fully costed Environmental Liabilities Risk Assessment for the facility which addresses liabilities arising from the carrying on of the proposed waste activities (to include all proposed waste activities); and
  - e) A proposal for Financial Provision to cover any liabilities incurred in carrying on the proposed waste activities.

## ARTICLE 13 COMPLIANCE REQUIREMENTS

1. Provide a non-technical summary of the Environmental Impact Statement (EIS) as it has not been included with the application. The non-technical summary should be updated to reflect the further information you supply below in compliance with this notice, insofar as that information impinges on the relevant non-technical summary.
2. The maximum air volume to be discharged from emission point reference A1.1 appears to be listed differently in different sections of the application (i.e. Table 1.1 lists 232,237 m<sup>3</sup>/h; Section D2.1, p.50 lists 142,000 Nm<sup>3</sup>/h; Section D2.1, p.21 lists 2 x 63,000 Nm<sup>3</sup>/h; Table 1.5 of H2.1, p.16 lists 126,000 Nm<sup>3</sup>/h typical and 150,980 Nm<sup>3</sup>/h maximum). Please reconcile these figures and confirm that the dispersion modelling used the correct value.
3. The Cumulative Impact Assessment in Section 6 of attachment 5 of the EIS was carried out for NO<sub>2</sub> and SO<sub>2</sub>. This should also be carried out for particulate and for dioxins.
4. An assessment of the annual average impact of SO<sub>2</sub> from emission point reference A1.1 should be included.
5. Please indicate what reference 28 refers to on p. 8 of 35 of Appendix 1.2 of the air dispersion modelling.
6. The impact assessment in Section 11 of the EIS refers to maximum annual ground level concentrations inconsistent with the air dispersion modelling. This assessment should be redone with the correct values used. Specific reference should be made in this assessment to potential impacts on pNHAs, SACs etc already identified.
7. Provide details on heat emissions, including source, location, nature, composition, quantity, level and rate; the impact of such emissions on the environment; and details on the monitoring of any such emissions.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

The requested information should be submitted to the Agency within one month of the date of this notice, in order to allow the Agency to process and determine your application.

Please supply Article 12 information in the form of an original and five copies and Article 13 information in the form of an original and fifteen copies.

Please note that the application's register number is 167-1. Please direct all correspondence in relation to this matter to *Administration, Waste Management Licensing, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,

pp. *Peter Carey*

**Dr Ken Macken**

Inspector

Environmental Management & Planning Division