

Managing Director
Monopower Limited
Killicarran
Emyvale
County Monaghan

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19 June 2006

W0226-01

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

Dear Managing Director,

I am to refer to the above referenced application for a waste licence relating to a facility at Monopower Limited, Killicarran, Emyvale, County Monaghan. 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

- Art 12(f)
 - Further details in Attachment B7 as to the identification of the activity as Class 9 of the Fourth Schedule and not Class 8 of the Third Schedule. Make reference to any relevant European Court Decisions or other interpretations in relation to the determination of the disposal or recovery of waste by incineration or co-incineration.
- Art 12(g and h)
 - Specify the rated thermal input of the combustion plant.
 - In relation to any proposed changes to the type and quantities of wastes to be utilised and the impact on the ash wastes produced



reassess Tables G.1 and H.1(ii) and submit revised tables where relevant.

- Re-evaluate the data in Attachment G.2 to include a detailed mass balance of the energy of the system.
- Art 12(i)
 - Details of the equipment and systems to be utilised for fire prevention and suppression.
 - Update the application to include detailed Piping and Instrumentation Diagrams (P&ID) of the individual process operations specified in Attachment D.1 section D.1.d.
- Art 12(k)
 - Reassess Table E.1(iii) of the application particularly in relation to the data supplied in the EIS particularly Table 4.3 Volume 2. Demonstrate how compliance with the requirements of the Incineration of Waste Directive (WID) (2000/76/EC) and/or Large Combustion Plant Directive (LCP) (2001/80/EC) or other relevant legislation will be achieved and supply additional information where necessary.
 - Reassess Table E.2(i) of the application in relation to the WID and the requirements regarding emissions of process effluent from the site if relevant. Details of the predicted quantities of boiler blowdown, water treatment system backwashes, wheelwash effluent and other process related effluent and detail how these effluents are to be separated from the uncontaminated surfacewater system and treated prior to discharge. Complete Table E.2(i) with specific reference to the pollutants in the effluent (and specified in WID if relevant) prior to dilution with uncontaminated surface water
- Art 12(l)
 - Submit a detailed assessment of the impact of the emissions to atmosphere to include air dispersion modelling of all the parameters to be emitted particularly those specified in the WID at the maximum proposed emission levels. The assessment should include the impact associated with any possible accumulation of substances in the environment and its transport within the ecosystem through inhalation and ingestion. The concept of the Most At Risk Individual (MARI) should be utilised where appropriate. The complete input and output files, including meteorological data used, should be submitted. In the assessment reference should be made to relevant ambient air quality standards and other internationally recognised standards and guidelines.

In relation to particulates the possible occurrence and impact of the PM₁₀ and PM_{2.5} fractions should be discussed.

- A detailed mass balance of water and lime on-site indicating all areas of input, output (as waste), fugitive losses and discharges to the environment (air, water, ground) and indicating how these are to be minimised. In addition provide details on the implications of a loss of supply of water on the abatement system and energy plant.
 - Describe in more detail the impact of the proposed discharge of process effluent on the surface water stream and the Mountain Water River with reference to dry weather flows and ambient water quality. Discuss the impact (if any) on the Ulster Blackwater or Lough Neagh.
 - Details of the source of the water for the fire hydrants. In the QED Risk Assessment Report it is stated that the site is to be split into two separate surfacewater systems— provide a detailed site drawing indicating the drainage system and the arrangements such as isolation or diversion valves allowing for the Calculation Assumption No. 6 in the report. Provide further details of the control and safety measures allowing for the Calculation Assumption No. 5. Provide details of the isolation or diversion system in place for the 'pond'.
 - Outline the proposed operation of the bio-clear system to clarify the descriptions in the EIS and licence application in relation to the assessment of the impact of the discharge to ground via the percolation system on the groundwater. Discuss the differences in the quality of the groundwater in the monitoring data submitted in Table I.4(i).
- Art 12(m)
 - Reassess the proposals in Attachment F.2 for monitoring of air and effluent emissions with reference to the WID and/or LCP.
 - Art 12(o)
 - Details of the proposed routes for the disposal/recovery of wastes produced by the activity including fly ash and bottom ash.
 - Details of the disposal of condensate from the spent compost drying system and particularly its use in the flue gas cleaning system. Supply data related to the quantity and quality of the condensate and any alternative disposal routes available.

- Art 12(p)

- Describe the proposed measures, including emergency procedures, to prevent unauthorised or unexpected emissions from any event where there may be failure of any abatement, monitoring or control equipment. This includes contingency plans for the abatement of air emissions from the storage and dryer areas in the event that the furnace is shut-down or on start-up. Indicate the implications of such plans on the quantity of wastes (solid, liquid, gaseous), odour or noise generated.
- Provide further details of the proposals in Attachment D.1 for the operation/shut-down of specific areas of the plant where the steam turbine is shut-down due to unplanned maintenance and/or electricity requirements. Outline the operation of the steam bypass system and provide an estimate of the frequency/duration of such operation based on specified similar units elsewhere.

Your reply to this notice should include a revised non-technical summary (Application Form) which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

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.

Please supply the information in the form of one original plus two copies within 2 months of the date of this notice. In addition submit sixteen copies of the requested information to the Agency in electronic searchable PDF format on CD-ROM. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is **W0226-01**. Please direct all correspondence in relation to this matter to the *Licensing Unit, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Marie O'Connor
Senior Inspector
Office of Licensing & Guidance