



Tracey Berney,
 Licensing Unit,
 Environmental Protection Agency,
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30th January 2008

License No: W0041-01

REF: TECHNICAL AMMENDMENT TO WASTE LICENSE

Dear Ms O'Connor,

Further to our recent discussion in December '07 I wish to request a technical amendment to our license No. W0041-01 the details of which are set out below.

A) AIR EMISSIONS

In relation to emissions to air we propose the following;

1. to incorporate the air emissions from our ammonia recovery process (as previously trialled under Technical Amendment B) into the existing emission point X2;
2. to increase the range of parameters monitored at X2 to include ammonia;
3. to increase the licensed flowrate at X2 to facilitate the above measures and allow for additional fugitive emission control as may be necessary in the future. It must be noted that Enva do not propose to change the mass emission limit values which would remain unchanged from those currently licensed and therefore would not change the environmental impact.

1.) It is Enva's understanding that the Agency's preferred approach in relation to multiple process/fugitive/other air emission sources is to have these routed to a single emission point. From the point of view of management and control of emissions this will give both Enva and the Agency a single reference point at which to assess all atmospheric emission sources. This will not prevent Enva from being able to carry out more detailed monitoring at source in the event that this is required.

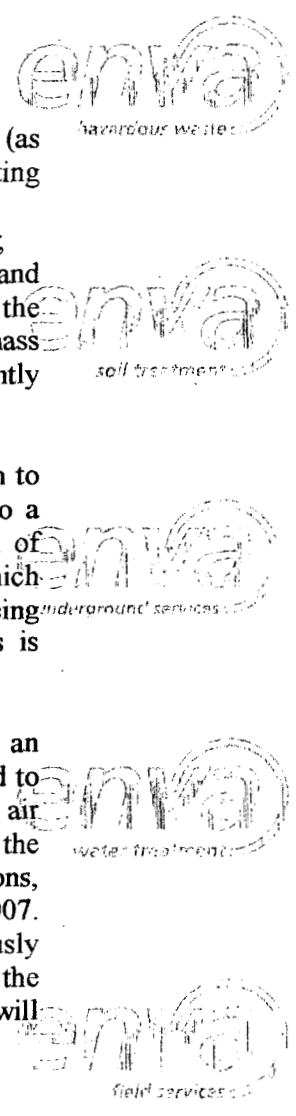
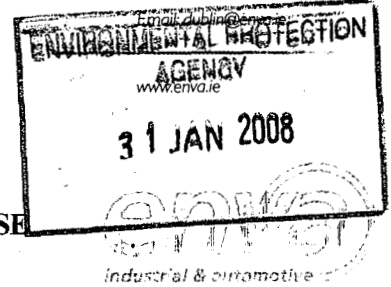
In December 2006 Enva was granted Technical Amendment B allowing an ammonia recovery plant to be operated on a trial basis for a defined period and to process a limited quantity of ammonia waste for the purposes of assessing the air emissions. This trial was carried out in 2007 and was successful in so far as the process was found to be highly efficient and there were no atmospheric emissions, odours etc. A report on this was submitted to the Agency on 22nd August 2007. Enva therefore propose to operate the ammonia recovery process as previously operated except that final emissions from the process will be directed to the licensed emission point at X2. The range of monitoring parameters at X2 will therefore be increased as set out in point 2 below.

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2.) In view of the connection of the ammonia recovery plant to X2 and other potential fugitive sources it is proposed to add ammonia to the range of parameters currently set out in Schedule G.1 of the license.

3.) Changes are proposed in relation to flowrate and ELVs for the monitored parameters as set out in the table below. The increased flow rate would facilitate the future addition of local extraction, for example to better control fugitive emissions from work areas, tanker off loading points etc. While these are not considered necessary at present the availability of extraction capacity could provide for improved working conditions as appropriate.

It is also proposed that no change be made to the current mass emissions from X2, however it is proposed that rather than specify concentration limits that mass emission values be licensed to allow for variable extraction rates and prevent unnecessary energy usage. As such the flow rate would only be increased as additional extraction points or demand necessitated.

Parameter	Current ELV	Equivalent Mass Emission	Proposed ELV
Volume to be emitted – maximum per hour	800 m ³ /hr	Not applicable	16,000 m ³ /hr
T.A. Luft Organics Class I	20 mg/m ³	16 g/hr	16 g/hr
T.A. Luft Organics Class II	100 mg/m ³	80 g/hr	80 g/hr
T.A. Luft Organics Class III	150 mg/m ³	120 g/hr	120 g/hr
T.A. Luft Organics Class I + Class II + Class III	150 mg/m ³	120 g/hr	120 g/hr
Hydrogen Chloride (as HCl)	10 mg/m ³	8 g/hr	8 g/hr
Sulphur oxides (as SO ₂)	300 mg/m ³	240 g/hr	240 g/hr
Nitrogen oxides (as NO ₂)	300 mg/m ³	240 g/hr	240 g/hr
Ammonia*	30 mg/m ³	24 g/hr	24 g/hr

* Ammonia is an additional parameter to be added to the Schedule. Technical Amendment B permitted an ELV for ammonia of 30mg/m³ at a flowrate of 800m³/hr.

B) SEWER EMISSIONS

Upon issue of the license in 2000 it was anticipated that the effluent treatment plant at Tradaree to which Enva discharges its treated trade effluent would shortly undergo a long awaited upgrade. On foot of this, two sets of limits were included in Schedule G.2, one to take effect immediately and the other more restrictive set to take effect later that year. The license provided for variation of these limits subject to Agency agreement. On this basis it was agreed between all relevant parties (i.e. the Agency, Shannon Development and more recently Clare County Council) that the ELVs could be varied. This situation has essentially remained unaltered and the upgrade to Tradaree is still awaited.

Two problems have arisen from this. Firstly the originally imposed ELV for daily flowrate at X1 which was set at 150m³/day could not be changed as the license did not specifically permit variation of this even though Shannon Development and more recently Clare County Council were agreeable to increasing this to 250m³/day. Secondly, from the Agency's perspective it is not immediately clear from perusal of the license what agreed ELVs are applicable.

We therefore propose that the currently agreed list of ELVs for X1 (as set out in the table below) including the higher daily flowrate of 250m³/day be specified within the Technical Amendment. It is proposed that these should remain in place until December 2010 or until such time as the Tradaree facility is upgraded and operational. A letter from Clare County Council to this effect is attached. We would propose that the wording of the Technical Amendment facilitate future changes in flow/ELVs that may be agreed with Clare County Council.

Parameter	Units	ELV
COD	mg/l	3,000
BOD	mg/l	2,000
Suspended Solids	mg/l	400
Sulphides (as S)	mg/l	10
Sulphates (as SO ₄)	mg/l	1,500
Detergents	mg/l	80
Phosphorous (as P)	mg/l	50
Phenols	mg/l	3
Ammonia (Total)	mg/l	250
Nitrates	mg/l	100
Silver	mg/l	2
Aluminium	mg/l	10
Cadmium	mg/l	0.5
Cobalt	mg/l	10
Chromium (III)	mg/l	10
Chromium (VI)	mg/l	0.05
Copper	mg/l	10
Mercury	mg/l	0.05
Iron	mg/l	20
Nickel	mg/l	20
Lead	mg/l	0.5
Tin	mg/l	2.0
Zinc	mg/l	20
Arsenic	mg/l	1
Cyanide	mg/l	0.5
Chlorides	mg/l	3,000
Fluoride	mg/l	10
Organohalogens	mg/l	0.15
pH		6-10
Temperature	°C	43°C
Colour	mg/l Pt/Co	200
Fats,Oils and Grease	mg/l	50
Toxicity	tu = 100/48hour EC ₅₀	10
Daily Flow Rate	m ³ /day	250
Hourly Flow Rate	m ³ /hour	20

OTHER ISSUES

A number of other minor amendments are proposed for the purposes of clarification, efficiency and standardisation. In summary these amendments concern the following:

1. EWC codes accepted.
2. Waste carrier approval.
3. Number of copies of documentation submitted to Agency.
4. Redundant labels.
5. AER submission date.
6. Locking of sampling hut.
7. Sampling arrangements.
8. Noise monitoring locations.

1.) Schedule H of the license refers to Tables E.1.2 & E.1.3 of the license application. These were submitted in 1999 prior to the publication of the currently applicable list of EWC codes. For the purposes of simplification it is proposed that an updated version of "Tables E.1.2 & E.1.3" be included in the Technical Amendment. For the purposes of brevity and simplicity we propose the following table:

Tables E.1.2 & E.1.3 – Amended Version 2008.

Chapter	Description	EWC included
01	Wastes resulting from exploration, mining, quarrying, physical and chemical treatment of minerals.	01 01 01 to 01 05 99
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing.	02 01 01 02 01 03 to 02 02 01 02 02 03 to 02 07 99
03	Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard.	03 01 01 to 03 03 99
04	Wastes from the leather, fur and textile industries.	04 01 01 to 04 02 99
05	Wastes from petroleum refining, natural gas purification and pyrolytic treatment of coal.	05 01 02* to 05 07 99
06	Wastes from inorganic chemical processes.	06 01 01* to 06 06 99 06 07 02* to 06 13 03 06 13 05* to 06 13 99
07	Wastes from organic chemical processes.	07 01 01* to 07 07 99
08	Wastes from the manufacture, formulation, supply and use (MFSU) of coatings (paints, varnishes and vitreous enamels), sealants and printing inks.	08 01 11* to 08 05 01*
09	Wastes from photographic industry.	09 01 01* to 09 01 99
10	Wastes from thermal processes.	10 01 01 to 10 13 07 10 13 10 to 10 14 01*
11	Wastes from chemical surface treatment and coating of metals and other materials: non-ferrous hydro-metallurgy.	11 01 05* to 11 05 99
12	Wastes from shaping and physical and mechanical surface treatment of metals and plastics.	12 01 01 to 12 03 02*
13	Oil wastes and wastes of liquid fuels (except edible oils, 05 and 12).	13 01 01* to 13 08 99*
14	Waste organic solvents, refrigerants and propellants (except 07 and 08).	14 06 01* to 14 06 05*
15	Waste packaging: absorbents, wiping cloths, filter materials and protective clothing not otherwise specified.	15 01 01 to 15 02 03
16	Wastes not otherwise specified in the list.	16 01 03 to 16 01 04* 16 01 07* to 16 02 11* 16 02 13* to 16 03 06 16 05 04* to 16 11 06
17	Construction and demolition wastes (including excavated soil from contaminated sites).	17 01 01 to 17 05 08 17 06 03* to 17 06 04 17 08 01* to 17 09 04
18	Wastes from human or animal health care and/or related research (except kitchen and restaurant wastes not arising from immediate health care).	18 01 01 to 18 01 02 18 01 04 to 18 02 01 18 02 03 to 18 02 08
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use.	19 01 02 to 19 04 04 19 05 99 to 19 13 08
20	Municipal waste (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions.	20 01 01 to 20 02 03 20 03 02 to 20 03 99

Thus the following EWC codes will be excluded from acceptance at the facility:

02 01 02	animal-tissue waste
02 02 02	animal-tissue waste
06 07 01*	wastes containing asbestos from electrolysis
06 13 04*	wastes from asbestos processing
10 13 09*	wastes from asbestos-cement manufacture containing asbestos
16 01 06	end-of-life vehicles, containing neither liquids nor other hazardous components
16 02 12*	discarded equipment containing free asbestos
16 04 01*	waste ammunition
16 04 02*	fireworks wastes
16 04 03*	other waste explosives
17 06 01*	insulation materials containing asbestos
17 06 05*	construction materials containing asbestos
18 01 03*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 02*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
19 05 01	non-composted fraction of municipal and similar wastes
19 05 02	non-composted fraction of animal and vegetable waste
19 05 03	off-specification compost
20 03 01	mixed municipal waste

2.) Condition 5.18 of the license currently requires prior approval of waste carriers by the Agency and states;

“All waste removed off-site for recovery or disposal shall only be conveyed by an authorised contractor, as agreed with the Agency, ...”

In line with similar waste licenses we would propose that it should be sufficient for Enva to ascertain that the carrier holds a relevant, current and applicable Waste Collection Permit and that a copy of this is retained on file by Enva. This is the case with other waste licensees and we would suggest the following may be adequate;

“Waste shall only be accepted at the facility from Local Authority waste collection or transport vehicles or holders of waste permits, unless exempted or excluded, issued under the Waste Management (Collection Permit) Regulations 2001. Copies of these waste collection permits must be maintained at the facility.”

3.) Condition 3.5 (b) of the license currently requires that *“all documentation submitted to the Agency shall comprise one original and three copies”*. As per the EPA letter of 27th April 2004 just one original and two copies are sufficient to meet the Agency’s needs. Enva therefore propose that this be included within the Technical Amendment.

4.) Condition 5.6 of the license which relates to labelling and marking of waste containers also states *“All previous markings and labels shall be defaced or crossed out but shall remain legible”*. In view of the confusion that may result from redundant labels that can still be seen and the conflict that this generates between requirements of UN IMDG regulations and the Waste License it is proposed that the requirement that redundant labels *“shall remain legible”* should be removed and that the condition should allow for removal, defacement or crossing out of redundant labels.

5.) Condition 2.8.1 of the license requires the Annual Environmental Report be submitted "*within one month of the end of each year...*" whereas most if not all other licensees are required to submit the AER "*by 31st March each year*". Given that the Agency guidelines, training seminar dates and deadlines for associated reports (e.g. PRTR) are organised in the context of a 31st March timeframe it is therefore proposed that Enva's deadline for submission should also be moved to end March each year. The above proposal was made previously in early 2007 and was agreed verbally on 23rd November 2007 with the EPA Enforcement Officer for Enva.

6.) Condition 7.12 of our license requires that the building housing our automatic sampling equipment "*shall be locked and keys held in the custody of Shannon Development, Clare County Council and the licensee*". It is our view that the condition concerning locking of the sample hut is redundant and serves no useful purpose especially in view of the recent automation of the sampling arrangements and increased site security measures implemented recently. This proposal was submitted to the Agency in our letter of 6th November 2007 and was agreed to verbally by our Enforcement Officer on 15th November 2007.

7.) Condition 7.13 of our license requires that trade effluent samples from emission point X1 be divided into three equal parts, one for Enva, one for Clare County Council and one for Shannon Development. As per our letter of 6th November 2007 a composite sample is now collected into a 10 litre bottle. The sampler automatically commences filling a separate 10 litre composite sample bottle at the same time each day. This provides adequate sample for our own analysis on site, as well as any periodic collection by Agency personnel, split sampling analysis and collection by any other regulatory body. In the event of the Agency or other regulatory body requiring a sample the 10-litre bottle is re-homogenised and the Agency's sample bottle as well as an Enva container is filled directly from this.

Prior to this, samples were collected to a single container and decanted into several smaller 1 litre containers. This led to Agency concerns about sample integrity/consistency, integrity of "split samples" as well as concerns about sufficiency of sample volume.

We therefore propose that the Technical Amendment remove the requirement for subdividing the sample into three equal parts each day.

8.) Schedule F1.1 sets out noise monitoring locations for monitoring of noise impact both on-site and off-site. Many of these on-site locations over estimate Enva's likely noise impact beyond the site boundary. Most of the locations are adjacent the ten-foot high boundary wall and some are within roofed areas. Both of these factors would serve to abate noise levels immediately beyond the site boundary however. Additionally, many of the off-site locations have several off-site sources situated between the monitoring location and the Enva site and therefore do not measure noise from Enva.

It is therefore proposed that the Technical Amendment allow for these locations to be altered with agreement of the Agency in accordance with changing circumstances.

I trust the above is to your satisfaction, if you have any further queries in relation to this matter please do not hesitate to contact me.

Yours sincerely,



David Burke,
HSE & Compliance Manager.

CC: Marie O Connor, EPA, Regional Inspectorate, Cork

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ENCL:

- Letter of 9th January 2008 from Enva Ireland Ltd re previously agreed ELVs at X2.
- Letter of 29th January 2008 from Clare County Council renewing agreement to ELVs at X2.