

Licensing Unit  
Environmental Protection Agency  
Office of Climate, Licensing & Resource Use  
PO Box 3000  
Johnstown Castle Estate  
County Wexford

26/03/2010

**RE: Waste Licence Application Reg No: W0274-01**

Dear Sir / Madam,

We refer to the Waste Licence application Reg. No. W0274-01 made by ADPower Roscommon Ltd and to the four third party submissions made to date and include below our comments in relation to these submissions.

**1 Submission by Ms. Margaret McGovern**

**Issues Raised**

- i) Pollution – (effects on her potatoes / vegetables and her 3 animals)
- ii) Small scale plant was outlined originally – originally stated that waste permit would be sufficient

**Response**

- i) Pollution - There will be no pollution arising from the proposed facility due to the precise material reception and processing procedures which will be put in place during operation of the facility.

Odour emissions will be mitigated by way of the proposed raw material acceptance procedure which will ensure that all raw materials are accepted into the plant via a sealed reception building. The reception building will be subject to negative pressure. All nuisance odours will be collected by an extraction system and subsequently treated by way of a biofilter. The anaerobic digester operates as a “plug in” system, with raw materials being pumped from the delivery vehicle into a sealed reception tank. The raw sludge materials will not come into contact with the atmosphere.

Likewise any potential ground water contamination will be mitigated via the raw material acceptance procedure outlined above. Delivery vehicles, once unloaded, will be washed down within the reception building prior to their onward journey. All material handling will occur indoors. Regular ground water monitoring will form a substantial portion of the proposed EPA waste licencing criteria.

- ii) Small Scale Plant (originally stated that waste permit would be sufficient) - A waste permit has been granted for the facility. Such a permit will allow full operation of the facility, however an EPA Waste Licence has been sought to ensure “best in class” environmental procedures are put in place and

independently monitored to the highest standards. As facility owners, BioPower will ensure the plant performs as a model site with best practice procedures being implemented where ever possible.

## 2 Submission by Mr. Bernard & Ms. Verone Donohue

### *Issues Raised*

- i) Volume of lorries turning outside their house (opposite local access road on the N5)
- ii) Increased traffic on N5
- iii) Size of the facility
- iv) Types of wastes being treated
- v) Odour
- vi) Effects on water in the area

### *Response*

- i) Volume of Lorries & safety – This is a planning issue, however, the proposed site location at Ballinphuill. Tibohine offers excellent access to the N5. The N5 is a main artery of the national road network in the North West. The N5 is a typical national primary road which caters for average hourly traffic volumes of less than 300 vehicles, much less than the actual capacity of the N5. To improve the current levels of safety at the intersection between the N5 and the local access road, it is planned to realign the existing junction to incorporate a right hand turning lane and a left hand deceleration lane. A design to facilitate these road improvements have been prepared by RPS Engineering and reviewed by Roscommon County Council. Such works will improve upon current standards of safety at this location.
- ii) Increased Traffic – This is a planning issue, however, to supply feedstock to the BioPark a maximum of 12 commercial vehicle movements will be generated daily. This comprises of 6 inbound and 6 outbound each day. Such levels are thought to have minimal impact on the adjacent N5 junction which the proposed BioPark traffic will traverse.
- iii) Size of the Facility - The proposed anaerobic digestion facility has capacity to treat up to 25,000 tonnes of biodegradable material per annum. For this technology type such a capacity would be considered small/medium scale.
- iv) Types of Wastes - The facility will only be capable of treating/accepting non-hazardous biodegradable material such as biodegradable municipal waste, source segregated catering waste, animal slurries, energy crops such as silage and biodegradable industrial sludges such as dairy waste or chicken manure. Ultimately all material being accepted into the plant will be sanitized and must be safe to put back on agricultural land as digestate compost.
- v) Odour - This issue is dealt with in response to submission by **Margaret McGovern** above.

- vi) Effect on Water - This issue is dealt with in response to submission by **Margaret McGovern** above.

### 3 Submission by Ms. Theresa Jordan

#### *Issues Raised*

- i) Spring well – drinking water pollution
- ii) Residential area and not suitable for industrial plant
- iii) Tibohine National School
- iv) Increased traffic

#### *Response*

- i) Spring Well (water pollution) - This issue is dealt with in response to submission by **Margaret McGovern** above.
- ii) Residential area and not suitable for industrial plant - The proposed BioPark development would be classed as an agri-commercial enterprise and not an industrial activity as outlined in Ms. Jordan's submission. With a large volume of the raw material feed stock being sourced from agriculture and ultimately being recycled back into agriculture as a nutrient rich compost fertiliser once digested, it is necessary that such a facility is located within an agricultural setting.

Housing density in the vicinity of the proposed BioPark is low, with only 4 dwellings within a 500m radius of site from the centre of the site. The applicant would like however like to point out that it is not uncommon for such anaerobic digestion facilities being purposefully developed in very close proximity to urban population centres. The advantages of this are the availability of inexpensive heat and hot water from the anaerobic digester which can be supplied to the local population. Such arrangements are quite common in European countries such as Germany and Denmark where respectively there are 3,500 and 600 such facilities in operation.

One of Ireland's first anaerobic digestion facilities is located in Ballytobin, Co. Kilkenny. This facility, located within the Camp Hill community village, integrates perfectly into the everyday living environment of the 70+ residence within touching distance of the facility. The aim of this pioneering facility, when developed in 1999, was to demonstrate anaerobic digestion in Ireland while also showing the potential to harness its sustainable energy (heat and electricity) within a local community environment.

- iii) Tibohine National School - Tibohine National School is located on the N5, 635 meters from the junction between the local site access road and the N5. The school is located 590 meters away from the centre of the proposed site. At such distances it is thought that the modest levels of traffic generated by the BioPark will have a negligible effect on road safety or environmental security in the vicinity of the school.

- iv) Increased Traffic - This issue is dealt with in response to submission by **Mr. Bernard & Ms. Verone Donohue** above.

#### **4 Submission by Mr. Noel & Ms. Sandra Cunningham**

##### ***Issues Raised***

- i) Close proximity of the plant to their home
- ii) Effects on their two small children, odour & noise
- iii) Originally proposed to be small scale – waste permit was said to be sufficient
- iv) Size of plant

##### ***Response***

- i) Close proximity of the plant to their home - The site location at Ballinphuill, Tibohine offers exceptional benefits for such a facility in terms of its natural topography, natural screening, noise abatement and access to a national primary route, the N5. The proposed site is surrounded by dense forestry plantation on all four sides.

Housing density in the vicinity of the proposed BioPark is low, however the applicant would like to point out that it is not uncommon to see such anaerobic digestion facilities being purposefully developed in very close proximity to population centres.

This issue is also dealt with in response to submission by **Ms. Theresa Jordan** above.

- ii) Effects on their two small children (odour & noise) - The issue of odour is dealt with in response to submission by **Ms. Theresa Jordan** above.

As with odour, water and dust, noise levels will be monitored strictly under the terms of the proposed EPA Waste Licencing criteria. The potential sources of noise on site will be the CHP biogas engine and the various feedstock pumping systems. The pumping systems will all be located in doors and will only be in operation intermittently. Noise from pumps is thought to be negligible. The CHP gas engine will be located within its own acoustic enclosure to mitigate any noise pollution being audible at the site boundary.

- iii) Originally proposed to be small scale (waste permit was said to be sufficient) - This issue is dealt with in point (ii) of our response to submission by **Margaret McGovern** above.
- iv) Size of plant - This issue is dealt with in response to submission by **Mr. Bernard & Ms. Verone Donohue** above.

