



Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

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Mr. David Naughton
Panda Waste Services Ltd.
Rathdrinagh
Beauparc
Navan
Co. Meath

27 October 2011

Waste Licence Application Reg. No.: W0140-04

Re.: Notice in accordance with Article 16(1)(a)(i) of the Waste Management (Licensing) Regulations 2004, as amended.

Dear Mr. Naughton,

I am to refer to the above referenced application for a waste licence relating to a facility operated by **Nurendale Ltd. (T/A Panda Waste Services Ltd) at Rathdrinagh, Beauparc, Navan, Co. Meath.** Having examined the documentation submitted, I am to advise that the Agency is of the view that further information relating to the application is required in order to enable the Agency to make a decision in respect of the application.

You are therefore requested, in accordance with Article 16(1)(a)(i) of the Regulations, to take the steps and supply further information as detailed below:

FURTHER INFORMATION REQUIRED:

Biological treatment and the CHP plant:

1. Section 1.2, Appendix 2 of the application states that an emergency flare burns the surplus biogas from the biological treatment facility. Additional information supplied to the Agency on 8 September 2011 states that biogas will be fed into three gas powered electricity generators and the associated air emission points A2-3, A2-4 and A2-5 have been identified on drawing number 3 revision C at the CHP unit. The dispersion modelling assessment

supplied to the Agency on 21 April 2011 also states that A3, A4 and A5 are the emission points from the CHP gas engines.

- Confirm whether air emissions will be generated from three gas engines and a gas flare as part of the overall operation of the CHP plant.
 - Update all associated drawings with the correct number of air emission reference points (including the gas flare).
 - Update all applicable parts of the application including sections E, F and I and the air dispersion modelling report to ensure all current aspects of the application are addressed. In that regard, state why the gas flare was not included in the air dispersion modelling and revise the model accordingly and as appropriate.
2. Clarify how excess heat generated by the combined operation of the CHP plant and biomass boiler that is not required for the operation of the biomass dryer and the biological treatment facility will be handled.
 3. Describe the sources and uses of heat and how they interchange/act and are controlled. State whether the CHP and/or biomass boiler are the primary source of heat for the various users of heat at the facility.
 4. Confirm the thermal rated input (to be expressed in Megawatts) of the CHP plant.
 5. Confirm if the '*finished compost screening and loading hall*' mentioned in section 4.6.1.4 of the odour assessment report is the same area as the '*clean area (finished product)*' identified on drawing no. 2009-101-202 and whether air is being extracted from the finished product clean area and being routed to the biotrickling filter for treatment.
 6. Clarify how it is intended to handle and control the compost after the pasteurisation process.
 7. Clarify the effectiveness of the biotrickling filter in preventing the release of pathogenic organisms to air prior to pasteurisation.
 8. Clarify how it is proposed to mitigate against pathogenic organisms being released to air during the maintenance of the biotrickling filter and in particular during the removal of spent biofilter media.
 9. Clarify how is it proposed to mitigate against odour and bioaerosol emissions during movement of partially treated waste from the composting tunnels in building 1 if they are used as a pre-treatment step prior to transfer to the biological treatment facility in building 4.

Refuse derived fuel manufacture:

10. The initial process flow submitted for building 3 stated that the dryer was fuelled by LPG or biomass; however, an updated process flow submitted for building 3 on 8 September 2011 stated that dryer is fuelled solely by biomass.
 - Confirm whether natural gas is a standby fuel for the biomass furnace.



11. Confirm the thermal rated input (to be expressed in Megawatts) of the biomass furnace.
12. Clarify how it is proposed to control heat to and process air from the RDF dryer when the furnace is heating up but is under the required minimum treatment temperature and how this links into the carbon filter air abatement system.
13. Confirm whether the RDF will be manufactured to a recognised standard.

General:

14. Additional information submitted confirmed your intention to install a constructed wetland in 2012. It was also confirmed that the constructed wetland will receive water run-off from the existing yard area for treatment before being discharged to a stream on the facility boundary.
 - The application states that discharge to surface water was stopped in 2006 following agreement with the Agency. It has been stated in previous AERs that the stream at the boundary of the facility has been piped. Confirm how it is intended to discharge from the constructed wetland to the piped stream.
 - Confirm whether you intend to discharge from the constructed wetland to the stream via emission point SW1 specified in Schedule B.2 of the licence.
 - Clarify how you intend to route the discharge from the constructed wetland to the surface water emission point.
 - Confirm the location of SW1 as drawing no. 3 revision C and drawing number PWS/002 identify SW1 at different locations. Update relevant drawings with the correct location of SW1 (surface water emission) in accordance with Schedule B.2 of the licence.
 - Clarify what level of treatment the constructed wetland will provide and state what emission limit values will be achieved.
 - Clarify why run-off from the yard area of the proposed extension is being routed to a soakaway rather than to the constructed wetland.
 - Provide an assessment of the proposed surface water discharge in terms of the requirements of the Environmental Objectives (Surface Waters) Regulations 2009.
 - Provide an assessment of the proposed groundwater discharge in terms of the requirements of the Environmental Objectives (Groundwater) Regulations 2010, as amended.
15. Clarify whether the land proposed to facilitate the construction of the biological treatment facility is owned by Panda Waste Services Ltd.
16. Clarify the current status of operations/construction at the facility.



Your reply to this notice should include a revised non-technical summary 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 a one (1) original plus one (1) copy in hardcopy format within 3 weeks of the date of this notice. In addition submit sixteen (16) 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 **W0140-04**. Please direct all correspondence in relation to this matter to *Administration, Environmental Licensing Unit, Office of Climate, Licensing & Resource Use, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Ms Caroline Connell

Inspector

Environmental Licensing Programme

Office of Climate, Licensing & Resource Use

