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

13 April 2012

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. State what interaction/consultation has taken place with Department of Agriculture, Food and the Marine (DAFM) to date. Clarify what is to be authorised by DAFM under the Animal By-Products Regulations EC No. 1069/2009 and show it is anticipated that authorisation will be obtained.



2. State how it has been determined that final stage pasteurisation is preferable and a better environmental option than initial stage pasteurisation. Take into consideration the potential risk of build-up of pathogens or other harmful bacteria in the process prior to pasteurisation, the potential loading due to microbiological build-up on the air treatment system, risk of cross-contamination in the process and risk of cross-contamination of pathogens or other harmful bacteria to the environment outside the biological treatment facility.
3. Clarify how it is proposed to prevent a build-up of pathogens and/or other harmful microorganisms in all stages of the process including the bio-trickling filter, the carbon filter in the RDF plant and on equipment used prior to the pasteurisation step. Clarify how it is proposed to prevent similar build-up in feedstock transport vehicles.
4. Clarify how the risks of cross-contamination will be controlled:
  - between chambers, equipment and operators within the biological treatment facility including interactions between pre-pasteurisation and post pasteurisation areas and the indoor and outdoor environment. Elaborate on pest control arrangements at the biological treatment facility;
  - whether a one-way system is proposed;
  - between equipment and operators used in pre-pasteurisation and post pasteurisation areas and the potential risk of final product contamination;
  - between equipment and operators working inside the biological treatment facility and the outdoor environment; and
  - between pests which have the potential in carrying pathogens or other harmful microorganisms from the biological treatment facility and the environment outside of the facility boundary.
5. Elaborate how the technology in the biological treatment facility is BAT.
6. Confirm the maximum volume of bio-gas proposed to be stored at any one time at the facility.
  - Clarify what controls are proposed in the biological treatment facility and the CHP plant to mitigate against fire and explosion risks and whether the relevant regulatory body has approved these control measures in accordance with relevant standard(s)/legislation.
7. Elaborate on how the bio-trickling filter's design ensures it is capable of filtering pathogens/bacteria, bio-aerosols, fine particles and other parameters from process air prior to discharge.

Refuse derived fuel manufacture:

8. It has been proposed that during periods when the biomass furnace is not operational that air emissions will be discharged via the carbon filter unit. The Dispersion Modelling Assessment examined the predicted emissions from a RTO and a biomass furnace. Describe the anticipated emissions from the carbon filter.



- State whether the predicted emissions from the carbon filter unit have been considered in the Dispersion Modelling Assessment and confirm whether this alters the assessment's conclusion that the facility will not impact on air quality in the surrounding area.
9. Clarify why the parameters hydrogen chloride and hydrogen fluoride have not been added to Table 3.6 of the Dispersion Modelling Assessment. Update Table 3.6 with the data relevant to these parameters.
- Confirm if these emission rates were taken into account in Sections 4.1.5 and 4.1.6 of the report. If this data was omitted update these sections of the report and any other affected sections accordingly.
  - Table 3.6 lists emission values for specific parameters. Quantify the potential for dioxin emissions from the biomass furnace, in particular during combustion of process off-gases.
10. Based on the mass emission rates reported in Tables 3.2 and 3.6 of the Dispersion Modelling Assessment, the "concentration limit values" and the "mass emission rates" appear higher for the predicted emissions from the biomass furnace than the RTO system. Previously in the application it is stated that the biomass furnace provides a higher level of treatment to odorous air than the previously proposed RTO system.
- Clarify with regard to emission quality, and not process efficiencies, why the biomass furnace was chosen instead of the RTO.
  - Elaborate on how the biomass furnace is BAT for the treatment of process off-gases.
11. Elaborate on how the carbon filter's design ensures it is capable of filtering pathogens/bacteria, bio-aerosols, fine particles and other parameters from process air prior to discharge.

General:

12. As previously confirmed the lean-to area is proposed to be fully enclosed as per drawing no. 10-03-101-SK04.
- Confirm when it is proposed to enclose this area as per the above drawing.
  - Confirm if noise monitoring has been carried out while the C&D recovery area was fully operational. Provide relevant monitoring results.
13. Confirm when it is proposed to install the constructed wetland.
14. Provide one map which displays:
- the current location of SW1;
  - the location of the proposed discharge SW1 from the constructed wetland; and
  - the drain on the southern boundary of the facility and it's connectivity to the unnamed third order stream, the Roughrange (Main channel) River and the Boyne River.



15. Complete and submit screening for Appropriate Assessment in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011).

- Ensure the screening demonstrates whether the project is or is not likely, whether individually or in combination with other plans or projects, to have significant effects on any European Site or sites as defined in Regulation 2(1) of the Habitats Regulations (S.I. No. 477 of 2011) having regard to best scientific knowledge and its conservation objectives.
  - i. Where, based on the Stage 1 screening, it is considered that an appropriate assessment is not required, a reasoned response should be provided.
  - ii. Where screening has determined that an appropriate assessment is required, an appropriate assessment in accordance with Article 6(3) of the Habitats Directive (92/43/EEC) should be completed and a copy of the Natura Impact Statement submitted as part of this application. The assessment should consider the following impacts on any European Site(s):
    - a) The impact of the existing facility on European Sites;
    - b) The cumulative effects of the project combined with other plans or projects that might impact on the European Site(s);
    - c) An assessment of the implications of the project for the European Site in view of the European Site's conservation objectives;
    - d) The objectives of proposed remediation measures with regard to existing impacts identified in item (a);
    - e) The impact on the European Site of any physical works carried out at the facility during construction activities;
    - f) Details of any mitigation measures proposed at or in relation to the European Site, including timeframes for the implementation and monitoring of the measures; and
    - g) Natura Impact Statement conclusion statement. The statement should conclude whether the project will or will not adversely affect the integrity of the European Site(s) having regard to its conservation objectives.

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.

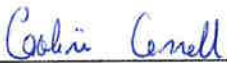
In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing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