Mr Conor Jones
Indaver Ireland Limited
Unit 11
South Ring Business Park
Kinsale Road
Cork

Environmental Protection Agency

Regional Inspectorate, McCumiskey House
Richview, Clonskeagh Road,
Dublin 14, Ireland

Cigireacht Réigiúnach, Teach Mhic Chumascaigh,
Dea-Raghare, Bothar Cluain Sceach,
Baile Átha Cliath 14, Éire

T: +353 1 268 0100
F: +353 1 268 0199
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

9th August 2012

Reg. No. W0167-03

re: Waste Licence Review Application W0167-03: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations 2004 to 2011

Dear Mr Jones,

I am to refer to the above referenced application for a waste licence review relating to a facility at Carranstown, Duleek, Meath. 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

1. Section B.7: Classes of Activity

   (i) Please reconsider whether Class D10 *Incineration on land* should be included in the requested classes of activity, or justify the omission of this class, having regard to the classes currently authorised under Waste Licence W0167-02. You are advised that if Class D10 is not authorised, and if the calculated R1 energy efficiency value does not meet the required threshold of ≥ 0.65, the facility will be required to shut-down incineration operations.

   Please update sections B.6 and B.7 of the application form as necessary.

2. Recovery Operation R1

   (i) Provide a breakdown of the R1 energy efficiency calculation presented in attachment G.2 of the application, using the format in Annex 5 of the European Commission *Guidelines on the Interpretation of the R1 Energy Efficiency Formula for Incineration Facilities dedicated to the Processing of Municipal Solid Waste according to Annex II of Directive 2008/98/EC on Waste.*

   (ii) Identify the operating period used to obtain the reported R1 value of 0.683. Justify whether the identified operating period represents typical operation.

(iii) Identify the maximum possible variation in the R1 value based on variations in operating parameters.

(iv) Identify how the average calorific value of the waste feed will change if the proposed additional waste types are accepted, and explain how the proposed additional waste types will impact on the R1 calculation.

(v) Identify how the average calorific value of waste entering the furnace is monitored to ensure that the required energy efficiency is maintained.

3. Waste Incineration Directive (2000/76/EC) (WID)

(i) Confirm whether it is intended that the operating conditions specified in Article 6(1)** of WID will be required, and how they will be achieved, if applicable. If a minimum combustion temperature of 850°C is to be retained, identify how waste acceptance procedures will be modified to ensure that hazardous wastes containing >1% of halogenated organic substances are not inadvertently introduced to the furnace.

** *If hazardous wastes with a content of more than 1% of halogenated organic substances, expressed as chlorine, are incinerated, the temperature has to be raised to 1,100°C for at least two seconds.*

(ii) Identify whether the 'nominal capacity' (as defined in Article 3 of WID) of the plant will change, having regard to Condition 3.19.2 of licence W0167-02.

4. Industrial Emissions Directive 2010/75/EU (IED)

(i) Identify the relevant categories of activity under Annex I of the IED.

(ii) Confirm whether the facility will operate in accordance with the requirements of the IED and identify any new provisions to be made at the facility to ensure compliance with IED.

(iii) Provide information to address the items specified under Article 45(2) of the IED - additional requirements for incineration of hazardous wastes.

5. Provide further evidence, based on international experience at a similar facility, that grate furnace technology is suitable for the treatment of the proposed hazardous waste types.

6. Describe the proposed arrangements for the storage and unloading of aqueous wastes delivered to the facility for treatment.

7. Identify the capacity (in terms of population equivalent) of the proposed new waste water treatment system to serve the modular office block.

8. Provide details, including operation, maintenance, efficiency, emissions, etc., of the new odour abatement system (carbon filtration system) scheduled to operate during shut-down of the incinerator. Identify whether this back-up abatement system will be installed/retained at the facility on a permanent basis.

9. A maximum surface water discharge rate of 59.8 litres/sec is identified in *Table E.2(i) Emissions to Surface Waters* of Appendix E.3 of the application. Please clarify this figure having regard to the 36.2 litres/sec maximum discharge rate specified in Condition 3.13.1 of licence W0167-02.

10. Air Dispersion Model

    (i) Confirm whether the air dispersion modeling study has been undertaken in accordance with the Agency's guidance note *Air Dispersion Modelling from Industrial Installations Guidance Note (AG4).*

    (ii) Confirm whether the input data to the AERMOD model is the same as the previous assessment (2009 EIS), with the exception of volume flow rate and efflux velocity. If not, please identify any variations to the model input data.

    (iii) It is noted that the requested volume flow rate of 183,700 Nm^3/hr from the stack is approximately 25% higher than the current maximum licensed volume flow rate of 147,000 Nm^3/hr. Identify the reason for such a significant increase, and whether the proposed 10% increase in waste throughput will contribute to the increase in volume flow rate from the stack.

    (iv) Explain why a maximum flow rate of 183,700 Nm^3/hr is requested given that a reported maximum spot value of 192,086 Nm^3/hr was measured from the stack based on current operations.

    (v) Identify the predicted environmental concentrations (PECs) (background plus process contribution) for each modelled parameter in Tables 7.6 to 7.9 of the EIS.

    (vi) Identify the PECs for each modelled parameter associated with maximum abnormal operations (as per Condition 3.20.2 of licence W0167-02) at the requested volume flow rate of 183,700 Nm^3/hr from the stack, or any revised requested flow rate as appropriate.

    (vii) Confirm whether updated traffic emissions associated with the proposed 10% increase in waste acceptance were incorporated into the background NO_2, PM_{10} and $PM_{2.5}$ concentrations used in the study. If not, please update the background concentrations as necessary.

    (viii) Please submit an electronic copy of all files used in the air dispersion model (input, output, meteorological, terrain, buildings data, etc.).

11. Confirm whether noise emissions from the facility will comply with the Agency's recently published *Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)*, in particular the revised daytime hours (07:00 to 19:00 hrs) and the new limit for evening time (19:00 to 23:00 hrs).

12. Identify and provide details of any amendments which will be required to the following items, as a result of the proposed changes to the facility operations:

    (i) Decommissioning Management Plan (DMP) required under Condition 10.2 of licence W0167-02.

    (ii) Environmental Liabilities Risk Assessment (ELRA) required under Condition 12.2 of licence W0167-02.

    (iii) Fire Water Risk Management Programme required under Condition 3.7.1 of licence W0167-02.

13. Provide a copy of the screening report for Appropriate Assessment, as referenced in Section 12.3 of the EIS.

ARTICLE 13 COMPLIANCE REQUIREMENTS

1. *Chapter 7 Air Quality* should be updated to reflect the information requested under Question 10 of the *Article 12 Compliance Requirements* above.

2. *Chapter 8 Noise and Vibration* should be updated to reflect the Agency's recently published *Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4),* in particular the revised noise limits and assessment periods for daytime, evening, and night-time.

3. *Chapter 11 Surface Water*: Section 11.3.3 of the EIS refers to the design rate of surface water discharge from the site as 59.8 litres/second, as agreed with Meath County Council. Please clarify this figure having regard to the 36.2 litres/sec maximum discharge rate specified in Condition 3.13.1 of licence W0167-02.

4. *Chapter 12: Ecology* should be updated to include the screening report for Appropriate Assessment, as referenced in Section 12.3 of the EIS.

Your reply to this notice should include a revised non-technical summary (Application Form and EIS) 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 **eight 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 **W0167-03**. Please direct all correspondence in relation to this matter to Administration, *Environmental Licensing Programme, Office of Climate, Licensing & Resource Use, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,

Aoife Loughnane

Aoife Loughnane
Inspector
Environmental Licensing Programme