



Regional Directorate, McCloskey House
Bundee, Crossroads Park
Dundrum, Ireland

Clairmont Begunach, Teach Tine Dromhaire
Dún Dealgan, Bóthar Chéim Treasa
Dún Dealgan, Dún Dealgan

T: 01 453 1100 (local)
F: 01 453 1100 (1999)
E: rmo@epa.ie
W: www.epa.ie

18/04/2013 10:55:59

Mr Raphael McEvoy
Technical Director
Glanpower Limited
19 High Street
Tullamore
Co Offaly

18/04/2013

W0282-01

re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

Dear Mr McEvoy,

I am to refer to the above referenced application for a waste licence relating to a facility at Glanpower Limited, Derryclure Energy Centre, Derryclure, Tullamore, Co Offaly. 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. Waste processing

Demonstrate that the pyrolysis plant is a suitable facility for processing the flue gas treatment and scrubber water treatment residues and waste oils generated at the facility and that the processing of these materials will not change the class of waste facility for which a waste licence application has been submitted. Waste oils are a hazardous waste and processing waste oils may require changing the class of licence to that for a hazardous waste treatment facility.

2. Environmental liabilities

Prepare and submit an Environmental Liabilities Risk Assessment (ELRA) and a Closure, Restoration and Aftercare Management Plan (CRAMP) and address the mechanism(s) proposed for financial provisions. Have regard to the Agency's *Guidance on Environmental Liability Risk Assessment, Residuals Management Plans and Financial Provisions* (Environmental Protection Agency, 2006), in carrying out this work.



3. Site boundary plan

Submit a revised site boundary plan, which clearly delineates the boundary of the facility in a colour distinct from any other lines on the drawing.

4. Syngas cleaning

Justify the assertion that all potential syngas contaminants would be removed in the syngas treatment, and that the combustion of the cleaned and conditioned syngas is exempt from Chapter IV of the Industrial Emissions Directive, as per Article 42 of this Directive. Your response should consider, but not be exclusive to, the potential presence of chlorine containing contaminants (including HCl), ammonia, sulphides and cyanides, and should include detailed analysis of the contaminants potentially present in the syngas (post treatment) and a comparison of the results of this analysis with the levels of these contaminants typically found in natural gas. If the applicant intends to utilise a standard to confirm the syngas has been treated to a level acceptable for burning in the gas engines, then submit details of the standard to be used.

5. Emissions to air

Reconcile the results in the analysis sheet included in Appendix D.20 for char derived from MSW (municipal solid waste) that indicates typical levels of 2.5% sulphur and 2.5% chlorine with the assertion that there will be a minimal content of chlorine and sulphur in the char to be burnt in the secondary cyclonic converter. Confirm the expected content of chlorine and sulphur in the char, the potential for emissions of dioxins and sulphur dioxide from combustion of the char and the operational requirements (i.e., temperature and residence time) under the Waste Incineration Directive for combustion of the char. This work should where possible include the results of detailed analysis of char produced from a similar process to the one proposed and justification of the assertion that the vast majority of chlorine will be released into the gas phase in the pyrolysis process. Having reviewed the analysis of the char, review the proposed operational requirements for the combustion of char in the secondary cyclonic converter, the proposed abatement requirements for emission point A2-1 and, if necessary, review the air impact assessment included in the licence application.

Confirm the maximum emission levels (kg/hr) and, as necessary, proposed emission limit values, of particulate matter and VOCs for emission points A2-2, A2-3, A2-4, and revise Table E.1(iii) accordingly. Complete and submit Table E.1(iii) for A2-5 (regenerative thermal oxidiser) with respect to combustion products and A2-7 with respect to sulphur dioxide.

6. Monitoring and control of emissions

Complete Table F.2 for emission point A2-5 with respect to combustion products.

Confirm the proposed odour abatement unit for A2-6 and complete Table F.1 accordingly.

7. Waste storage



Complete Table G.1 with respect to the maximum quantities of SRF and biomass to be stored on-site and advise how management of the associated fire risk has been considered.

8. Noise

Demonstrate that the additional new noise sources introduced since the preparation of the Environmental Impact Statement will not cause a significant increase in noise to the external environment nor cause noise levels at noise sensitive locations to breach the permitted noise levels indicated in the Agency's *Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)*.

Complete Table E.5(i) Noise Emissions for the identified noise sources.

9. Energy

Review the energy efficiency calculation included in Appendix G of the licence application to ensure the energy content of the biomass is (i) fully incorporated into and (ii) fully excluded from the energy content of the fuels entering the process as well as the energy produced by the process, and submit a revised calculation as necessary. The calculation should be carried out on an annualised basis and should also consider auxiliary fuels used, e.g. in start-up or shut-down of the process. The calculations should be carried out in line with the European Commission's *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*.

Advise on the outcome of the proposal to the EU Commission NER 300 funding programme for innovative renewable energy and the outcome of the application to the Commission for Energy Regulation to establish the proposed facility as High Efficient CHP plant.

10. Air impact assessment

Oxides of nitrogen:- Identify the conversion method for NO to NO₂ and submit data showing how the predicted environmental concentration (PEC) for NO₂ for the short term averaging period was calculated. Clarify whether or not the licence application is referring to NO₂, when the licence application discusses the NO_x for human health standards. Identify the process contribution (excluding landfill flare from the neighbouring facility) of the facility as well as the PEC. Review the NO₂ and NO_x emissions from A2-5 and revise the air dispersion model as necessary. Confirm each of the three stacks A2-2, A2-3, A2-4 were incorporated into model.

Dioxins:- using the approach recommended by the World Health Organisation and the US Environmental Protection Agency that considers the Tolerable Daily Intake and Maximum At Risk Individual, and by considering the European Union's Tolerable Weekly Intake, review the impact assessment of dioxin emissions. Report the maximum annual mean ground level concentration for dioxins.

Hydrogen fluoride:- consider the impact of HF on vegetation and grazing animals. Consider both short and long term Environmental Assessment Levels



with respect to the protection of human health (ref. latest version of UK Environment Agency's H1 Guidance (Annex F – Air emissions)).

Heavy metals and PAHs:- assess the impact of emissions against all standards included in Directive 2004/107/EC.

Sulphur Dioxide:- assess impact of sulphur dioxide emissions when the emergency generators are in operation. This may be carried out for short term averaging periods only.

Particulates (PM₁₀ and PM_{2.5}):- confirm process contribution (excluding other sources) of the facility as well as the PEC for PM₁₀ and PM_{2.5}.

Odour:- clarify if the cumulative impact assessment for emissions to air included odour emissions from the adjacent landfill and revise the odour impact assessment as necessary.

Contour plots (isopleths):- submit revised contour plots for the most up to date air dispersion model for NO₂ (annual and 99.8%ile hourly), NO_x (annual), PM₁₀ (90.4%ile daily and annual), PM_{2.5} (annual), IHF (annual), dioxins (annual) and odour units (99.8%ile hourly), showing odour sensitive locations.

11. Landfill gas from Derryclure landfill:

Clarify whether the applicant proposes to combust landfill gas from the adjacent landfill at the proposed waste facility and provide details of the environmental implications of so doing, as necessary.

12. Submit a baseline report in line with Article 22(2) of the Industrial Emissions Directive (2010/75/EU).

13. Review the screening for Appropriate Assessment, considering the potential impact of emissions to atmosphere on Charleville Wood cSAC 00057, and state whether the activity, individually or in combination with other plans or projects is likely to have a significant effect on a European Site(s), in view of best scientific knowledge and of the conservation objectives of the site(s).

Where it cannot be excluded, on the basis of objective scientific information, following screening for Appropriate Assessment, that an activity, either individually or in combination with other plans or projects, will have a significant effect on a European Site, provide a Natura Impact Statement, as defined in Regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations (S.I. No. 477 of 2011). Where based on the screening it is considered that an Appropriate Assessment is not required, a reasoned response should be provided.

You are furthermore advised to refer to the document '*Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities*', issued in 2009 by the Department of the Environment, Heritage and Local Government, and revised in 2010. This document is available at:

http://www.npws.ie/publications/archive/NPWS_2009_AA_Guidance.pdf

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 **W0282-01**. 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,

A handwritten signature in cursive script, which appears to read 'John McEntagart', is written over a horizontal line.

Mr John McEntagart

Inspector

Office of Climate, Licensing & Resource Use