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Mr David Naughton
Nurendale Limited t/a Panda Waste Services
Rathdrinagh
Beauparc
Navan
County Meath

18 December 2014

Reg. No: W0140-04

Dear Mr Naughton

I refer to the Environmental Impact Statement which was received on 26 May 2014 and submitted in support of your application for an Industrial Emissions licence.

I am to advise in accordance with Regulation 11(2)(b) of the Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013, that the EIS does not comply with Article 94 of the Planning and Development Regulations. The following information is required in support of the Environmental Impact Statement:

1. The numbering of the emission points in Table 11.1 of the EIS does not correspond with the points identified in Drawing No. 3 Revision A. Amend Table 11.1 to correlate with Drawing No. 3 or vice versa.
2. Provide a process flow diagram for the RDF manufacturing process.
3. Identify well locations BH1 and BH2 on Drawing No. 3.
4. Section 3.4.1 of the EIS states that a biomass furnace is being used instead of a RTO as it has a significantly lower carbon footprint. However, the air and odour dispersion models make reference to TO exhaust stacks and section 11.5 states that an RTO will be operated at the installation. Please clarify whether a RTO is proposed to be used at the installation and for what purpose. Provide amended relevant texts of the EIS accordingly.
5. *Air Dispersion Modeling*
 - a. Section 11.6 states that the gas flare was not included in the air dispersion model; however, the model attached in Appendix 11 includes the predicted emissions from the gas flare.
 - b. The modeling did not include the biofilter in Building 4 and the carbon filter in Building 3.
 - Provide air dispersion modeling which includes all point source emissions to air (excluding the gas flare) at the installation in order to assess the overall impact of the installation's emissions on air quality.



Note: ensure the numbering used in the air dispersion model correlates with Drawing no. 3.

- Include modeling for the parameters non-methane volatile organic carbon and hydrogen sulphide from biogas CHP engines.

6. *Odour Impact Assessment*

- a. The scope of the Odour Impact Assessment does not seem to include the emission to air at location A-1 (biofilter associated with the Wright Tunnels). Section 4.10 of the EIS states that the Wright tunnels may be used in the future either in the initial stage of biological treatment or in the manufacture of RDF/SRF.

Provide an odour impact assessment that includes all point and fugitive sources of odour at the installation in order to allow the cumulative effect to be assessed.

Note: ensure the numbering used in the odour model correlates with Drawing no. 3.

7. *Noise*

Table 12.8 lists the predicted noise levels of plant proposed for use at the installation. Confirm how these noise levels were predicted.

8. In accordance with Regulation 9(2)(p), describe the measures to be taken for minimizing pollution over long distances.
9. In accordance with Regulation 9(2)(q), describe the measures to be taken under abnormal operating conditions for current and proposed activities including:
 - a. start-up and shutdown;
 - b. leaks;
 - c. malfunctions, breakdowns and momentary stoppages.
10. As required under paragraph 2 (b) of Schedule 6 of The Planning and Development Regulations 2001, as amended, provide a description of any aspect of cultural heritage likely to be significantly affected by the activities at the installation.
11. Describe fully and in detail the inter-relationship between the following factors: human beings, fauna and flora, soil, water, air, climate, landscape, material assets (including architectural and archaeological & cultural heritage).

The Agency, in fulfilling its duty under Section 83(2A)(f) of the EPA Acts, as amended, requests the information to be submitted to the Agency within **8 weeks** of the date of this notice.

This information must be submitted as an addendum to the EIS.

Please submit the information as 1 signed original, 1 hard copy and 2 copies in electronic searchable PDF format on CD-ROM.

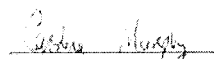
In addition to the above please also provide an updated non-technical summary to the EIS to reflect the information provided in your reply.

Your response to this request should be directed to Noeleen Keavey Administration Officer, Office of Climate, Licensing, Resources & Research. It should be noted that the eight-week period within which the Agency is to decide the proposed determination cannot commence until this notice has been complied with.

Note: Any *telephone enquiries* in relation to the above should be directed to **Caroline Murphy** at the number above.
All *written communications and replies* should be directed to Noeleen Keavey, Office of Climate, Licensing, Resources and Research, EPA, PO Box 3000, Johnstown Castle Estate, County Wexford.



Yours sincerely


Caroline Murphy

Environmental Licensing Programme
Office of Climate, Licensing, Resources & Research

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