

For the Attention of
Waste Licensing (Applications) Unit
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford

Our Ref.: RG0204/WL Review
Direct Dial: 01 802 0521
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Date: 6th March 2015

Dear EPA,

**Re.: Waste Licence Review Application Ref. W0279-02; Rehab Glassco Ltd.
Unsolicited Additional Information: Air Emissions Monitoring/Air Dispersion Model**

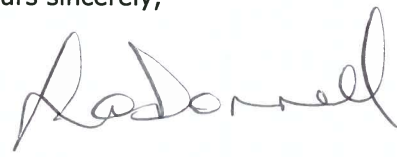
Patel Tonra Ltd., Environmental Solutions, is acting for our client, Rehab Glassco Ltd., under the instruction of Mr. Zeki Mustafa, Managing Director of Rehab Glassco Ltd.

Please find enclosed the following reports, in relation to the above Waste Licence Review Application:

- (i) Air Scientific (Feb. 2015) *Air Emissions Compliance Monitoring Emissions Report*
- (ii) Odour Monitoring Ireland (Feb. 2015) *Dispersion Modelling Assessment of Classical Air Pollutants from Named Emission Point Located in Rehab Glassco Ltd, Oberstown Industrial Park, Naas, Co. Kildare.*


We enclose 1 No. original and 1 No. copy in print, and 2 No. electronic copies, as per EPA *Instructions for Licence Applicants*. Please accept this letter as a declaration that the content of the electronic files on the accompanying CD-ROMs is a true copy of the original.

Yours sincerely,

VP


Vip Patel
Director, Patel Tonra Ltd.



| | |
|-------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| Report Title | Air Emissions Compliance Monitoring Emissions Report |
| Company address | Air Scientific Ltd., 40 Coolraine Heights, Old Cratloe Road, Limerick |
| Stack Emissions Testing Report Commissioned by | Rehab Glassco Limited |
| Facility Name | Rehab Glassco Limited |
| Contact Person | Paul Hodder / Zeki Mustafa |
| EPA Licence Number | W0279-01 |
| Licence Holder | Rehab Glassco Ltd |
| Stack Reference Number | A1 / A2 |
| Dates of the Monitoring Campaign | 21-01-2015 |
| Job Reference Number | REGLTL4210115 |
| Report Written By | Mr. Gregory Dempsey |
| Report Approved by | Mr. Mark McGarry |
| Stack Testing Team | David Noonan and Daniel Mullins |
| Report Date | 25-02-2015 |
| Report Type | Test Report Compliance Monitoring |
| Version | 1 |
| Signature of Approver |  Operations Manager |

*Opinions and interpretations expressed herein will be outside the scope of Air Scientific Limited INAB accreditation.
This test report shall not be reproduced, without the written approval of Air Scientific Limited.
All sampling and reporting is completed in accordance with Environmental Protection Agency Air Guidance Note 2 requirements.*

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Executive Summary

Monitoring Objectives

Overall Aim of the monitoring Campaign

The aim of the monitoring campaign was to demonstrate compliance with a set of emission limit values as specified in the site licence.

Special Requirements

There were no special requirements.

Target Parameters

| |
|-----------------------------------------------------------|
| Total Gaseous Organic Carbon (TOC) |
| T A Luft Organics |
| Volumetric Flow Rates (m ³ .hr ⁻¹) |

Emission Limit Values

| A1 | mg.m ⁻³ |
|--------------------------------------------|--------------------|
| TOC | 80 |
| T A Luft Organics | Not applicable |
| Volume (m ³ .hr ⁻¹) | 9,500 |

Reference Conditions

| Reference Conditions | Value |
|----------------------|--------|
| Oxygen Reference % | - |
| Temperature K | 273.15 |
| Total Pressure kPa | 101.3 |
| Moisture % | - |

Target Parameters

| |
|-----------------------------------------------------------|
| Total Gaseous Organic Carbon (TOC) |
| T A Luft Organics |
| Volumetric Flow Rates (m ³ .hr ⁻¹) |

Emission Limit Values

| A2 | mg.m ⁻³ |
|--------------------------------------------|--------------------|
| TOC | 80 |
| T A Luft Organics | Not applicable |
| Volume (m ³ .hr ⁻¹) | 8,000 |

Reference Conditions

| Reference Conditions | Value |
|----------------------|--------|
| Oxygen Reference % | - |
| Temperature K | 273.15 |
| Total Pressure kPa | 101.3 |
| Moisture % | - |

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Executive Summary

Overall Results

| A1 | Concentration | | | | |
|-------------------------------------|----------------------------------|---------------|---------------|--------------|------------------|
| Parameter | Units | Result | MU +/- | Limit | Compliant |
| Total Gaseous Organic Carbon (TOC) | mg.m ⁻³ | 45.9 | 1.59 | 80 | Yes |
| T A Luft Organics Class I/II/III | mg.m ⁻³ | <0.41 | 0.02 | - | - |
| Run 1 | | <0.42 | 0.02 | | |
| Run 2 | | <0.72 | 0.02 | | |
| Run 3 | | | | | |
| Volumetric Flow Rate (Ref.) | m ³ .hr ⁻¹ | 5,600 | - | 9,500 | - |

| A2 | Concentration | | | | |
|-------------------------------------|----------------------------------|---------------|---------------|--------------|------------------|
| Parameter | Units | Result | MU +/- | Limit | Compliant |
| Total Gaseous Organic Carbon (TOC) | mg.m ⁻³ | 59.6 | 1.98 | 80 | Yes |
| T A Luft Organics Class I/II/III | mg.m ⁻³ | <0.40 | 0.01 | - | Yes |
| Run 1 | | <0.46 | 0.01 | | |
| Run 2 | | <0.72 | 0.01 | | |
| Run 3 | | | | | |
| Volumetric Flow Rate (Ref.) | m ³ .hr ⁻¹ | 5,914 | - | 8,000 | Yes |

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Accreditation details

| | |
|--------------------------------|---------------------------------|
| Air Scientific Limited | INAB Number: 319T |
| External Analytical Laboratory | Accreditation number: UKAS 0605 |

Executive Summary

Process details

| | |
|--------------------------------------------|-----------------------|
| Stack Name | A1 – Old Drying Plant |
| Process status | Normal |
| Capacity (per/hour) (if applicable) | Variable |
| Continuous or Batch Process | Continuous |
| Feedstock | Glass |
| Abatement System | Bag Filters |
| Abatement Systems Running Status | Normal |
| Fuel | Natural Gas |
| Plume Appearance | Yes |
| Other information | None |

| | |
|--------------------------------------------|-----------------------|
| Stack Name | A2 – New Drying Plant |
| Process status | Normal |
| Capacity (per/hour) (if applicable) | Variable |
| Continuous or Batch Process | Continuous |
| Feedstock | Glass |
| Abatement System | Bag Filters |
| Abatement Systems Running Status | Normal |
| Fuel | Gas |
| Plume Appearance | No |
| Other information | None |

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Executive Summary

Monitoring, Equipment & Analytical Methods

| Parameter | Standard | Technical Procedure | Accredited Testing | Analytical Technique | Equipment / Media | Equipment ID Used on Site |
|------------------------------------|---------------|---------------------|--------------------|------------------------------------|---------------------------------------|----------------------------------------------|
| Total Gaseous Organic Carbon (TOC) | EN12619:2013 | 2009 | Yes | Flame Ionisation Detection | FID | ASLLK12EQ529 ASLLK12EQ500 ASLLK12EQ505 |
| T A Luft Organics | EN13649:2002 | 2019 | Yes | Solvent Desorption/ GCMS | Activated Carbon | ASLLK12EQ507 ASLLK12EQ514 ASLLK12EQ542 |
| Volumetric Flow Rate | EN 16911:2013 | 2005 | Yes | Manometer / Pitot / Calculation | Manometer / Pitot / Calculation | ASLLK13EQ500 ASLLK14EQ506 |

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Sampling Deviations

| Parameter | A1 |
|-------------------|------------------------------------------|
| EN12619:2013 | None |
| EN13649:2002 | None |
| EN 16911:2013 | None |
| Flow Rates | EN 16911 - in accordance with MID 6911-1 |

Reference Documents

| | |
|------------------------------|----------|
| Risk Assessment (RA) | SOP 1011 |
| Site Review (SR) | SOP 1015 |
| Site Specific Protocol (SSP) | SOP 1015 |

Suitability of Sample Location

| General Information | Value |
|---------------------|-----------|
| Permanent/Temporary | Permanent |
| Inside/ Outside | Outside |

Platform Details

| Irish EPA Technical Guidance Note AG1 / BS EN 15259 Platform Requirements | Value | Comment |
|--------------------------------------------------------------------------------|-------|---------|
| Sufficient Working area to manipulate probe and measuring instruments | Yes | - |
| Platform has 2 handrails (approx. 0.5m & 1.0 m high) | Yes | - |
| Platform has vertical base boards (approx. 0.25 m high) | Yes | - |
| Platform has chains / self-closing gates at top of ladders | No | - |
| There are no obstructions present which hamper insertion of sampling equipment | Yes | - |
| Safe Access Available | Yes | - |
| Easy Access Available | Yes | - |

Sampling Location / Platform Improvement Recommendations

None

BSEN 15259 Homogeneity Test Requirements

Not applicable

Select Option :

- 1: There is no requirement to perform a BSEN15259 Homogeneity Test on this stack
- 2: Test results were obtained from previous Homogeneity test carried out by ASL
- 3: Test results were obtained from previous Homogeneity test carried out by Alternative contractor

Sampling Deviations

| Parameter | A2 |
|-------------------|------------------------------------------|
| EN12619:2013 | None |
| EN13649:2002 | None |
| EN 16911:2013 | None |
| Flow Rates | EN 16911 - in accordance with MID 6911-1 |

Reference Documents

| | |
|------------------------------|----------|
| Risk Assessment (RA) | SOP 1011 |
| Site Review (SR) | SOP 1015 |
| Site Specific Protocol (SSP) | SOP 1015 |

Suitability of Sample Location

| General Information | Value |
|---------------------|-----------|
| Permanent/Temporary | Permanent |
| Inside/ Outside | Inside |

Platform Details

| Irish EPA Technical Guidance Note AG1 / BS EN 15259 Platform Requirements | Value | Comment |
|--------------------------------------------------------------------------------|-------|---------|
| Sufficient Working area to manipulate probe and measuring instruments | Yes | - |
| Platform has 2 handrails (approx. 0.5m & 1.0 m high) | Yes | - |
| Platform has vertical base boards (approx. 0.25 m high) | Yes | - |
| Platform has chains / self-closing gates at top of ladders | No | - |
| There are no obstructions present which hamper insertion of sampling equipment | Yes | - |
| Safe Access Available | Yes | - |
| Easy Access Available | Yes | - |

Sampling Location / Platform Improvement Recommendations

None

BSEN 15259 Homogeneity Test Requirements

Not applicable

Select Option :

- 1: There is no requirement to perform a BSEN15259 Homogeneity Test on this stack
- 2: Test results were obtained from previous Homogeneity test carried out by ASL
- 3: Test results were obtained from previous Homogeneity test carried out by Alternative contractor

Stack Diagram



Figure 1: A1

Stack Diagram



Figure 2: A2

1. APPENDICES

Appendix I Monitoring Personnel & Equipment

Stack Emissions Monitoring Personnel

| | | |
|--------------------|------------------------|--------------------------|
| Team Leader | Name | David Noonan |
| | System approval | ASL Team Leader Approved |
| | | |
| Technician | Name | Daniel Mullins |
| | System approval | ASL Technician Approved |

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Appendix II Stack Raw Data

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Title: Determination of Total Organic Compounds
Method: EN 12619:2013
Client: Rehab Glassco
Stack Reference: A1

Licence Limits

Emission Limit Value 80 mg.m⁻³
 Flow Rate Limit 9,500 m³.Hr⁻¹

Results

TOC Concentration 45.9 mg.m⁻³
 Flow Rate 5,637 m³.Hr⁻¹
 Uncertainty of Measurement 1.59 mg.m⁻³

Reference Conditions

Temperature (K) 273.13 °K
 Pressure (kPa) 101.3 kPa
 Gas (Wet or Dry) -
 Oxygen - %

Quality Data

Sampling Time 21/01/2015 10:56
 Instrument Range 100 ppm
 Span Gas Value 78 ppm
 Acceptable Gas Range Yes 50 - 90% of Range
 Oven Temperature 181 °C
 Average Temperature 180 °C
 Temperature Acceptable Yes Yes or No
 Sample line temperature 181 C

Zero Drift

Zero Down Sampling Line (Pre) 0 ppm
 Zero Down Sampling Line (Post) 0.2 ppm
 Zero drift 0.2 ppm
 Allowable Zero Drift 1.56 ppm
 Zero Drift Acceptable Yes Yes or No

Span Drift

Span (Pre) 78 ppm
 Span (Post) 77.9 ppm
 Span Drift -0.1 ppm
 Allowable Span Drift 1.56 ppm
 Span Drift Acceptable Yes Yes or No

Leak Check

Span Gas Conc. 78 ppm
 Recorded Conc. down Line (Pre) 78 ppm
 Leak Result 0 ppm
 Leak check acceptable (< 2%) 1.6 (Y/N)

Parameter

Standard EN 12619:2013
 Technical Procedure 2009
 Probe material Stainless Steel
 Filtration Type Ceramic Filter
 Heated Head Filter Used Yes
 Heated Line Temperature 180 Deg C
 Span Gas Reference Number ASLLK14ING524
 Span Gas Expiry Date Feb-17
 Span Gas Start Pressure (bar) 35 bar
 Gas Cylinder Concentration (ppm) 78 ppm
 Span Gas Uncertainty (%) 0.8 %
 Zero Gas Type Air
 Number of Sampling Lines Used 1
 Number of Sampling Points Used 1
 Sample Point I.D's 1

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Measured Quantities

| | | |
|----------------------------------|------|----------------|
| Certified Range of Analyser | 1000 | ppm |
| Operational Range of Analyser | 100 | ppm |
| Measured Reading | 29 | ppm |
| Non linearity | 0.4 | ppm |
| Temperature Dependent Zero drift | 0.15 | ppm Per Degree |
| Temperature Dependent Span drift | 0.1 | % Per Degree |
| Cross-sensitivity | 0.1 | ppm |
| Leak | 0 | ppm |
| Calibration Gas uncertainty | 0.8 | ppm |

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Title: Determination of Stack Flow Rate
Method: EN 16911-1
Client: Rehab Glassco
Stack Reference: A1

| Stack details | Value | Units |
|---------------------------------------------|------------|--------------|
| Date of survey | 20/01/2015 | |
| Time of survey | 11:00 | |
| Type | Circular | |
| Stack Diameter / Depth, D | 0.48 | Length (m) m |
| Stack Width, W | - | m |
| Average Stack Gas Temp., Ta | 112.5 | 385.65 C |
| Average Static Pressure, P static | 0.4 | kPa/mbar |
| Average Barometric Pressure, Pb | 99.51 | kPa |
| Type of Pitot | S | |
| Are Water Droplets Present ? | No | |
| Average Pitot Tube Calibration Coeff, Cp | 0.82 | |
| No local negative flow | No | |
| Highly homogeneous flow stream/gas velocity | Yes | |
| Sample Port Size | 101.6 | mm |
| Initial Pitot Leak Check | Pass | |
| Final Pitot Leak Check | Pass | |
| Orientation of Duct | Vertical | |
| Pitot Tube Cp | 0.998 | |
| Number of Lines Available | 2 | |
| Number of Lines Used | 2 | |

Sampling Line A

| Point | Distance | Pa | Temp C | Velocity | Oxygen | Swirl |
|---------|----------|-----|--------|----------|--------|-------|
| 1 | 0.07 | 104 | 112.5 | 12.4 | 17.5 | <15 |
| 2 | 0.41 | 100 | 112.5 | 12.1 | 17.5 | <15 |
| 3 | - | - | - | - | - | - |
| 4 | - | - | - | - | - | - |
| 5 | - | - | - | - | - | - |
| 6 | - | - | - | - | - | - |
| 7 | - | - | - | - | - | - |
| 8 | - | - | - | - | - | - |
| 9 | - | - | - | - | - | - |
| 10 | - | - | - | - | - | - |
| Average | | 102 | 112.5 | 12.25 | 17.50 | <15 |
| Min | | 100 | 112.5 | 12.13 | 17.5 | <15 |
| Max | | 104 | 112.5 | 12.37 | 17.5 | <15 |

Sampling Line B

| Point | Distance | Pa | Temp C | Velocity | Oxygen | Swirl |
|---------|----------|-------|--------|----------|--------|-------|
| 1 | 0.07 | 109 | 112.5 | 12.7 | 17.5 | <15 |
| 2 | 0.41 | 102 | 112.5 | 12.3 | 17.5 | <15 |
| 3 | - | - | - | - | - | - |
| 4 | - | - | - | - | - | - |
| 5 | - | - | - | - | - | - |
| 6 | - | - | - | - | - | - |
| 7 | - | - | - | - | - | - |
| 8 | - | - | - | - | - | - |
| 9 | - | - | - | - | - | - |
| 10 | - | - | - | - | - | - |
| Average | | 105.5 | 112.5 | 12.46 | 17.5 | <15 |
| Min | | 102 | 112.5 | 12.25 | 17.5 | <15 |
| Max | | 109 | 112.5 | 12.66 | 17.5 | <15 |

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| | | |
|-------------------------------------|--------|-----|
| Average stack Gas Velocity | 12.35 | m/s |
| Lowest Differential Pressure | 100.00 | Pa |
| Lowest Gas Velocity | 12.13 | m/s |
| Highest Gas Velocity | 12.66 | m/s |
| Average Differential Pressure | 103.75 | Pa |
| Velocity Ratio of High to Low (3:1) | 1.04 | |
| Average Angle of flow | <15 | |

| Component | Conc ppm | Conc Dry % v/v | Conc Wet % v/v | Molar Mass |
|--------------------|----------|----------------|----------------|------------|
| Carbon Dioxide CO2 | - | 3.4 | | 44.01 |
| Oxygen O2 | - | 17.5 | | 32 |
| Nitrogen N2 | - | 79.1 | | 28.1 |
| Moisture (H2O) | - | - | 0 | 18.02 |

| Reference Conditions | Units | Numbers |
|----------------------|-------|---------|
| Temperature | K | 273.13 |
| Total Pressure | kPa | 101.3 |
| Moisture | % | - |
| Oxygen (Dry) | % | - |

General Stack Details

| Stack details | Units | Value |
|-------------------------------------------|----------------|-------|
| Stack Diameter / Depth, D | m | 0.48 |
| Stack Width, W | m | |
| Stack Area, A | m ² | 0.18 |
| Average Stack Gas Temp., Ta | C | 172.5 |
| Average Static Pressure, P static | kPa | 0.4 |
| Average Barometric Pressure, Pb | kPa | 99.51 |
| Average Pitot Tube Calibration Coeff, Kpt | | 0.82 |

Calc box Area

| Circular Duct | Rectangular Duct |
|---------------|------------------|
| R = | Length (m) 0 |
| R2 = | Width (m) - |
| Area = Pie*R2 | Area - |

Stack Gas Composition & Molecular Weights

| Component | Molar Mass M | Density Kg/m3 p | Conc Dry % v/v | Dry Volume Fraction r |
|--------------------|--------------|-----------------|----------------|-----------------------|
| Carbon Dioxide CO2 | 44.01 | 1.96 | 3.4 | 0.034 |
| Oxygen O2 | 32 | 1.43 | 17.5 | 0.175 |
| Nitrogen N2 | 28.1 | 1.25 | 79.1 | 0.791 |
| Moisture (H2O) | 18.02 | 0.80 | | |

where $p=M/22.41$
 $pi = r \times p$

| | Dry Conc kg/m3 pi | Conc wet % v/v | Wet Volume Fraction r | Wet Conc kg/m3 pi |
|--------------------|-------------------|----------------|-----------------------|-------------------|
| Carbon Dioxide CO2 | 0.07 | 3.40 | 0.03 | 0.07 |
| Oxygen O2 | 0.25 | 17.50 | 0.18 | 0.25 |
| Nitrogen N2 | 0.99 | 79.10 | 0.79 | 0.99 |
| Moisture (H2O) | - | 0 | 0.00 | 0.00 |

Calculation of Stack Gas Densities

| Determinand | Units | Result |
|-----------------------------------------|-------------------|--------|
| Dry Density (STP), P STD | kg/m ³ | 1.308 |
| Wet Density (STP), P STW | kg/m ³ | 1.308 |
| Dry Density (Actual), P Actual | kg/m ³ | 0.910 |
| Average wet Density (Actual), P ActualW | kg/m ³ | 0.910 |

Where

P STD = sum of component concentrations, kg/m³ (excluding water vapour)

P STW = (P STD + pi of H₂O) / (1 + (pi of H₂O / 0.8036))

P actual = P STD x (T STP / (P STP)) x (Pa / Ta)

P actual W (at each sampling point) = P STW x (Ts / Ps) x (Pa / Ta)

Calculation of Stack Gas Volumetric Flowrate, Q

| Duct gas flow conditions | Units | Actual | REF |
|--------------------------|-------|--------|--------|
| Temperature | K | 385.65 | 273.13 |
| Total Pressure | kPa | 99.51 | 101.3 |
| Moisture | % | 0 | - |
| Oxygen (Dry) | % | 17.5 | - |

| Gas Volumetric Flowrate | Units | Result |
|---------------------------------------|--------------------|--------|
| Gas Volumetric Flow Rate (Actual) | m ³ /hr | 8049 |
| Gas Volumetric Flow Rate (STP, Wet) | m ³ /hr | 5600 |
| Gas Volumetric Flowrate (STP, Dry) | m ³ /hr | 5600 |
| Gas Volumetric Flowrate REF to Oxygen | m ³ /hr | |

Where

Actual = Va * A * 3600

STP Wet = Actual x (Ts / Ta) x (Pa / Ps) x 3600

STP , Dry = STP Wet / (100 - (100 / Water Vapour %))

REF = STP Dry x (100 - Water Vapour %) / (100 - Water Vapour Ref)) x (20.9 - O₂m) / (20.9 - O₂ Ref)

| Sampling Plane Validation Criteria | Value | Units | Requirement | Compliance | Method |
|------------------------------------|--------|---------|-------------|------------|---------|
| Lowest Differential Pressure | 100.00 | Pa | >5 Pa | Pass | EN16911 |
| Lowest Gas Velocity | 12.13 | m/s | - | - | - |
| Highest Gas Velocity | 12.66 | m/s | - | - | - |
| Ratio of Above | 1.04 | :1 | <3:1 | Pass | EN16911 |
| Mean Velocity | 12.35 | m/s | - | - | - |
| Angle of flow | <15 | degrees | < 15 | Pass | EN16911 |
| No local negative flow | No | - | - | - | - |
| Homogeneous flow | Yes | - | - | - | - |

Calculation of stack Gas Velocity, V

Velocity at Traverse Point, V = Kcp * Sqrt ((2 * DP) / Density) 227.93535

Where

Kpt = Pitot tube calibration coefficient 0.82

Compressibility correction factor, assumed at a constant 0.998 0.998

Title: Determination of Speciated Organic Compounds
Method: EN 13649
Client: Rehab Glassco
Test Date: 21/01/2015
Test Time: 10:44 11:17 11:47
Laboratory Used: RPS
Certificate Numbers: WK15- 0450
Stack Reference: A1

Leak Check Results

| | | | | |
|--------------------------|-------|-------|-------|-------|
| Prior to test: | 0 | 0 | 0 | l/min |
| Post Test: | 0 | 0 | 0 | l/min |
| Sample Volume Flow Rate: | 0.422 | 0.419 | 0.411 | l/min |
| Standard Requirement: | <5 | <5 | <5 | % |
| Test Result: | 0 | 0 | 0 | % |
| Test Status | Pass | Pass | Pass | |

Calibration Details

| | | | | |
|-------------------------------|--------------|--------------|--------------|-------------------|
| Pump Number: | ASLLK12EQ500 | ASLLK12EQ542 | ASLLK12EQ500 | |
| Calibration Unit: | ASLLK12EQ529 | ASLLK12EQ529 | ASLLK12EQ529 | |
| Calibration Unit Uncertainty: | <2 | <2 | <2 | % |
| Calibration Rate Before Test: | 0.42 | 0.42 | 0.41 | litres per minute |
| Calibration Rate After Test: | 0.423 | 0.419 | 0.412 | litres per minute |
| Maximum allowed flow | 0.5 | 0.5 | 0.5 | litres per minute |
| Average sample Volume: | 0.4215 | 0.4195 | 0.411 | litres per minute |
| Sample Test Time: | 30 | 30 | 30 | minutes |
| Pump Gas Temperature: | 9.6 | 9.6 | 9.6 | °C |
| Pump Sample Pressure: | 100.2 | 100.2 | 100.2 | kPa |
| Actual Sample Volume: | 0.01265 | 0.01259 | 0.01233 | m ³ |
| Normalised Gas Volume: | 0.01208 | 0.01203 | 0.01178 | Nm ³ |

Tube Details

| | | | | |
|--------------------------------|------------|------------|------------|-------|
| Tube Type: | 226-09 | 226-09 | 226-09 | |
| Tube Identification Number: | 5542909535 | 5105206597 | 5105206594 | |
| Blank Identification Number: | 5105206601 | 5105206601 | 5105206601 | |
| Main Adsorbent Layer | 400 | 400 | 400 | mg |
| Backup Adsorbent Layer | 200 | 200 | 200 | mg |
| Containment Material | Glass | Glass | Glass | |
| Breakthrough Occurred | No | No | No | |
| Tubes in Lab in <7 days | Yes | Yes | Yes | |
| Tubes >7 days were stored | <4 | <4 | <4 | Deg C |
| Tubes >7 days were stored | Dark | Dark | Dark | - |
| Transport Container Airtight | Yes | Yes | Yes | |
| Exposed to Sunlight | No | No | No | |
| Transport Temp <20 Deg C | Yes | Yes | Yes | |
| Field Blank <10% Analyte Value | Yes | Yes | Yes | |
| Field Blank <10% ELV | Yes | Yes | Yes | |

Test Details

| | | | | |
|------------------------------|-----|-----|-----|----|
| Adsorption Tube Temperature: | 9.6 | 9.6 | 9.6 | °C |
|------------------------------|-----|-----|-----|----|

Stack Flow Rates

| | | | | |
|-----------------------|-------|----------------------------------|--|--|
| Normalised Flow Rate: | 5,600 | m ³ .hr ⁻¹ | | |
|-----------------------|-------|----------------------------------|--|--|

Speciated Organic Results

| Class I | ug/tube | mg.m⁻³ |
|----------------|----------------|--------------------------|
| VOC Run 1 | 5 | 0.41 |
| VOC Run 2 | 5 | 0.42 |
| VOC Run 3 | 5 | 0.42 |

| | Concentration mg.m⁻³ | Uncertainty mg.m⁻³ | ELV mg.m⁻³ |
|-----------|--------------------------------------------|------------------------------------------|----------------------------------|
| VOC Run 1 | 0.41 | 0.02 | - |
| VOC Run 2 | 0.42 | 0.02 | - |
| VOC Run 3 | 0.42 | 0.02 | - |

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Title: Determination of Total Organic Compounds
Method: EN 12619:2013
Client: Rehab Glassco
Stack Reference: A2

Licence Limits

Emission Limit Value 80 mg.m⁻³
 Flow Rate Limit 8,000 m³.Hr⁻¹

Results

TOC Concentration 59.6 mg.m⁻³
 Flow Rate 5,931 m³.Hr⁻¹
 Uncertainty of Measurement 1.98 mg.m⁻³

Reference Conditions

Temperature (K) 273.13 °K
 Pressure (kPa) 101.3 kPa
 Gas (Wet or Dry) -
 Oxygen - %

Quality Data

Sampling Time 21/01/2015 13:06 -
 Instrument Range 100 ppm
 Span Gas Value 78 ppm
 Acceptable Gas Range Yes 50 - 90% of Range
 Oven Temperature 180 °C
 Average Temperature 180 °C
 Temperature Acceptable Yes Yes or No
 Sample line temperature 181 C

Zero Drift

Zero Down Sampling Line (Pre) 0 ppm
 Zero Down Sampling Line (Post) -0.2 ppm
 Zero drift -0.2 ppm
 Allowable Zero Drift 1.56 ppm
 Zero Drift Acceptable Yes Yes or No

Span Drift

Span (Pre) 78 ppm
 Span (Post) 77.8 ppm
 Span Drift -0.2 ppm
 Allowable Span Drift 1.56 ppm
 Span Drift Acceptable Yes Yes or No

Leak Check

Span Gas Conc. 78 ppm
 Recorded Conc. down Line (Pre) 78 ppm
 Leak Result 0 ppm
 Leak check acceptable (< 2%) 1.6 (Y/N)

Parameter

Standard EN 12619:2013
 Technical Procedure 2009
 Probe material Stainless Steel
 Filtration Type Ceramic Filter
 Heated Head Filter Used Yes
 Heated Line Temperature 180 Deg C
 Span Gas Reference Number ASLLK14ING524
 Span Gas Expiry Date Feb-17
 Span Gas Start Pressure (bar) 30 bar
 Gas Cylinder Concentration (ppm) 78 ppm
 Span Gas Uncertainty (%) 0.8 %
 Zero Gas Type Air
 Number of Sampling Lines Used 1
 Number of Sampling Points Used 1
 Sample Point I.D's 1

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Measured Quantities

| | | |
|----------------------------------|------|----------------|
| Certified Range of Analyser | 1000 | ppm |
| Operational Range of Analyser | 100 | ppm |
| Measured Reading | 37 | ppm |
| Non linearity | 0.4 | ppm |
| Temperature Dependent Zero drift | 0.15 | ppm Per Degree |
| Temperature Dependent Span drift | 0.1 | % Per Degree |
| Cross-sensitivity | 0.1 | ppm |
| Leak | 0 | ppm |
| Calibration Gas uncertainty | 0.8 | ppm |

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Title: Determination of Stack Flow Rate
Method: EN 16911-1
Client: Rehab Glassco
Stack Reference: A2

| Stack details | Value | Units |
|---------------------------------------------|------------|--------------|
| Date of survey | 20/01/2015 | |
| Time of survey | 13:00 | |
| Type | Circular | |
| Stack Diameter / Depth, D | 0.45 | Length (m) m |
| Stack Width, W | - | m |
| Average Stack Gas Temp., Ta | 65.8 | 338.95 C |
| Average Static Pressure, P static | 0.2 | mbar |
| Average Barometric Pressure, Pb | 100.1 | kPa |
| Type of Pitot | S | |
| Are Water Droplets Present ? | No | |
| Average Pitot Tube Calibration Coeff, Cp | 0.82 | |
| No local negative flow | No | |
| Highly homogeneous flow stream/gas velocity | Yes | |
| Sample Port Size | 101.6 | mm |
| Initial Pitot Leak Check | Pass | |
| Final Pitot Leak Check | Pass | |
| Orientation of Duct | Vertical | |
| Pitot Tube Cp | 0.998 | |
| Number of Lines Available | 2 | |
| Number of Lines Used | 2 | |

Sampling Line A

| Point | Distance | Pa | Temp C | Velocity | Oxygen | Swirl |
|---------|----------|-------|--------|----------|--------|-------|
| 1 | 0.07 | 145 | 65.8 | 13.7 | 19.5 | <15 |
| 2 | 0.38 | 124 | 65.8 | 12.7 | 19.5 | <15 |
| 3 | - | - | - | - | - | - |
| 4 | - | - | - | - | - | - |
| 5 | - | - | - | - | - | - |
| 6 | - | - | - | - | - | - |
| 7 | - | - | - | - | - | - |
| 8 | - | - | - | - | - | - |
| 9 | - | - | - | - | - | - |
| 10 | - | - | - | - | - | - |
| Average | | 134.5 | 65.8 | 13.19 | 19.50 | <15 |
| Min | | 124 | 65.8 | 12.67 | 19.5 | <15 |
| Max | | 145 | 65.8 | 13.71 | 19.5 | <15 |

Sampling Line B

| Point | Distance | Pa | Temp C | Velocity | Oxygen | Swirl |
|---------|----------|-------|--------|----------|--------|-------|
| 1 | 0.07 | 126 | 65.8 | 12.8 | 19.5 | <15 |
| 2 | 0.38 | 125 | 65.8 | 12.7 | 19.5 | <15 |
| 3 | - | - | - | - | - | - |
| 4 | - | - | - | - | - | - |
| 5 | - | - | - | - | - | - |
| 6 | - | - | - | - | - | - |
| 7 | - | - | - | - | - | - |
| 8 | - | - | - | - | - | - |
| 9 | - | - | - | - | - | - |
| 10 | - | - | - | - | - | - |
| Average | | 125.5 | 65.8 | 12.75 | 19.5 | <15 |
| Min | | 125 | 65.8 | 12.73 | 19.5 | <15 |
| Max | | 126 | 65.8 | 12.78 | 19.5 | <15 |

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| | | |
|-------------------------------------|--------|-----|
| Average stack Gas Velocity | 12.97 | m/s |
| Lowest Differential Pressure | 124.00 | Pa |
| Lowest Gas Velocity | 12.67 | m/s |
| Highest Gas Velocity | 13.71 | m/s |
| Average Differential Pressure | 130.00 | Pa |
| Velocity Ratio of High to Low (3:1) | 1.17 | |
| Average Angle of flow | <15 | |

| Component | Conc ppm | Conc Dry % v/v | Conc Wet % v/v | Molar Mass |
|--------------------|----------|----------------|----------------|------------|
| Carbon Dioxide CO2 | - | 1.5 | | 44.01 |
| Oxygen O2 | - | 19.5 | | 32 |
| Nitrogen N2 | - | 79 | | 28.1 |
| Moisture (H2O) | - | - | 0 | 18.02 |

| Reference Conditions | Units | Numbers |
|----------------------|-------|---------|
| Temperature | K | 273.13 |
| Total Pressure | kPa | 101.3 |
| Moisture | % | - |
| Oxygen (Dry) | % | - |

General Stack Details

| Stack details | Units | Value |
|-------------------------------------------|----------------|----------|
| Stack Diameter / Depth, D | m | 0.45 |
| Stack Width, W | m | - |
| Stack Area, A | m ² | 0.16 |
| Average Stack Gas Temp., Ta | C | 338.95 K |
| Average Static Pressure, P static | kPa | 0.2 |
| Average Barometric Pressure, Pb | kPa | 100.1 |
| Average Pitot Tube Calibration Coeff, Kpt | | 0.82 |

Calc box Area

Circular Duct

R = 0.225
 R2 = 0.050625
 Area = Pie*R2 = 0.16

Rectangular Duct

Length (m) = 0
 Width (m) = -
 Area = -

Stack Gas Composition & Molecular Weights

| Component | Molar Mass M | Density Kg/m3 p | Conc Dry % v/v | Dry Volume Fraction r |
|--------------------|--------------|-----------------|----------------|-----------------------|
| Carbon Dioxide CO2 | 44.01 | 1.96 | 1.5 | 0.015 |
| Oxygen O2 | 32 | 1.43 | 19.5 | 0.195 |
| Nitrogen N2 | 28.1 | 1.25 | 79 | 0.79 |
| Moisture (H2O) | 18.02 | 0.80 | | |

where $p=M/22.41$
 $pi = r \times p$

| | Dry Conc kg/m3 pi | Conc wet % v/v | Wet Volume Fraction r | Wet Conc kg/m3 pi |
|--------------------|-------------------|----------------|-----------------------|-------------------|
| Carbon Dioxide CO2 | 0.03 | 1.50 | 0.02 | 0.03 |
| Oxygen O2 | 0.28 | 19.50 | 0.20 | 0.28 |
| Nitrogen N2 | 0.99 | 79.00 | 0.79 | 0.99 |
| Moisture (H2O) | - | 0 | 0.00 | 0.00 |

Calculation of Stack Gas Densities

| Determinand | Units | Result |
|-----------------------------------------|-------------------|--------|
| Dry Density (STP), P STD | kg/m ³ | 1.298 |
| Wet Density (STP), P STW | kg/m ³ | 1.298 |
| Dry Density (Actual), P Actual | kg/m ³ | 1.034 |
| Average wet Density (Actual), P ActualW | kg/m ³ | 1.034 |

Where

P STD = sum of component concentrations, kg/m³ (excluding water vapour)

P STW = (P STD + pi of H₂O) / (1 + (pi of H₂O / 0.8036))

P actual = P STD x (T STP / (P STP)) x (Pa / Ta)

P actual W (at each sampling point) = P STW x (Ts / Ps) x (Pa / Ta)

Calculation of Stack Gas Volumetric Flowrate, Q

| Duct gas flow conditions | Units | Actual | REF |
|--------------------------|-------|--------|--------|
| Temperature | K | 338.95 | 273.13 |
| Total Pressure | kPa | 100.1 | 101.3 |
| Moisture | % | 0 | - |
| Oxygen (Dry) | % | 19.5 | - |

| Gas Volumetric Flowrate | Units | Result |
|---------------------------------------|--------------------|--------|
| Gas Volumetric Flow Rate (Actual) | m ³ /hr | 7427 |
| Gas Volumetric Flow Rate (STP, Wet) | m ³ /hr | 5914 |
| Gas Volumetric Flowrate (STP, Dry) | m ³ /hr | 5914 |
| Gas Volumetric Flowrate REF to Oxygen | m ³ /hr | |

Where

Actual = Va * A * 3600

STP Wet = Actual x (Ts / Ta) x (Pa / Ps) x 3600

STP , Dry = STP Wet / (100 - (100 / Water Vapour %))

REF = STP Dry x (100 - Water Vapour %) / (100 - Water Vapour Ref)) x (20.9 - O₂m) / (20.9 - O₂ Ref)

| Sampling Plane Validation Criteria | Value | Units | Requirement | Compliance | Method |
|------------------------------------|--------|---------|-------------|------------|---------|
| Lowest Differential Pressure | 124.00 | Pa | >5 Pa | Pass | EN16911 |
| Lowest Gas Velocity | 12.67 | m/s | - | - | - |
| Highest Gas Velocity | 13.71 | m/s | - | - | - |
| Ratio of Above | 1.08 | :1 | <3:1 | Pass | EN16911 |
| Mean Velocity | 12.97 | m/s | - | - | - |
| Angle of flow | <15 | degrees | < 15 | Pass | EN16911 |
| No local negative flow | No | - | - | - | - |
| Homogeneous flow | Yes | - | - | - | - |

Calculation of stack Gas Velocity, V

Velocity at Traverse Point, V = Kcp * Sqrt ((2 * DP) / Density) 251.4644

Where

Kpt = Pitot tube calibration coefficient 0.82

Compressibility correction factor, assumed at a constant 0.998 0.998

Title: Determination of Speciated Organic Compounds
Method: EN 13649
Client: Rehab Glassco
Test Date: 21/01/2005
Test Time: 12:57 13:44 14:30
Laboratory Used: RPS
Certificate Numbers: WK15-0450
Stack Reference: A2

Leak Check Results

| | | | | |
|--------------------------|-------|-------|-------|-------|
| Prior to test: | 0 | 0 | 0 | l/min |
| Post Test: | 0 | 0 | 0 | l/min |
| Sample Volume Flow Rate: | 0.447 | 0.382 | 0.248 | l/min |
| Standard Requirement: | <5 | | | % |
| Test Result: | 0 | | | % |
| Test Status | Pass | | | |

Calibration Details

| | | | | |
|-------------------------------|---------------|--------------|--------------|-------------------|
| Pump Number: | ALSKLK12EQ500 | ASLLK12EQ500 | ASLLK12EQ540 | |
| Calibration Unit: | ASLLK12EQ529 | ASLLK12EQ529 | ASLLK12EQ529 | |
| Calibration Unit Uncertainty: | <2 | | | % |
| Calibration Rate Before Test: | 0.446 | 0.383 | 0.25 | litres per minute |
| Calibration Rate After Test: | 0.448 | 0.381 | 0.245 | litres per minute |
| Maximum allowed flow | 0.5 | 0.5 | 0.5 | litres per minute |
| Average sample Volume: | 0.447 | 0.382 | 0.2475 | litres per minute |
| Sample Test Time: | 30 | 30 | 30 | minutes |
| Pump Gas Temperature: | 14.5 | 14.5 | 14.5 | °C |
| Pump Sample Pressure: | 100.1 | 100.1 | 100.1 | kPa |
| Actual Sample Volume: | 0.01341 | 0.01146 | 0.00743 | m ³ |
| Normalised Gas Volume: | 0.01258 | 0.01075 | 0.00697 | Nm ³ |

Tube Details

| | | | | |
|--------------------------------|------------|------------|------------|-------|
| Tube Type: | 226-09 | 226-09 | 226-09 | |
| Tube Identification Number: | 5105206599 | 5105206595 | 5105206593 | |
| Blank Identification Number: | 4879621572 | 4879621572 | 4879621572 | |
| Main Adsorbent Layer | 400 | 400 | 400 | mg |
| Backup Adsorbent Layer | 200 | 200 | 200 | mg |
| Containment Material | Glass | Glass | Glass | |
| Breakthrough Occurred | | | | |
| Tubes in Lab in <7 days | Yes | Yes | Yes | |
| Tubes >7 days were stored | <4 | <4 | <4 | Deg C |
| Tubes >7 days were stored | Dark | Dark | Dark | - |
| Transport Container Airtight | Yes | Yes | Yes | |
| Exposed to Sunlight | No | No | No | |
| Transport Temp <20 Deg C | Yes | Yes | Yes | |
| Field Blank <10% Analyte Value | Yes | Yes | Yes | |
| Field Blank <10% ELV | Yes | Yes | Yes | |

Test Details

| | | | | |
|------------------------------|------|--|--|----|
| Adsorption Tube Temperature: | 14.5 | | | °C |
|------------------------------|------|--|--|----|

Stack Flow Rates

| | | | | |
|-----------------------|------|----------------------------------|--|--|
| Normalised Flow Rate: | 5914 | m ³ .hr ⁻¹ | | |
|-----------------------|------|----------------------------------|--|--|

Speciated Organic Results

| Class | ug/tube | mg.m⁻³ | kg.hr⁻¹ |
|--------------|----------------|--------------------------|---------------------------|
| VOC Run 1 | 5 | 0.40 | 0.0024 |
| VOC Run 2 | 5 | 0.46 | 0.0027 |
| VOC Run 3 | 5 | 0.72 | 0.0042 |

| | Concentration mg.m⁻³ | Uncertainty mg.m⁻³ | ELV mg.m⁻³ |
|-----------|--------------------------------------------|------------------------------------------|----------------------------------|
| VOC Run 1 | 0.40 | 0.01 | - |
| VOC Run 2 | 0.46 | 0.01 | - |
| VOC Run 3 | 0.72 | 0.01 | - |

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**DISPERSION MODELLING ASSESSMENT OF CLASSICAL AIR POLLUTANTS FROM NAMED
EMISSION POINT LOCATED IN REHAB GLASSCO LTD, OBERSTOWN INDUSTRIAL PARK,
NAAS, CO. KILDARE.**

PERFORMED BY ODOUR MONITORING IRELAND ON THE BEHALF OF AXIS ENVIRONMENTAL LTD.

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REPORT PREPARED BY: Dr. Brian Sheridan
REPORT VERSION: Document Ver.1
ATTENTION: Mr. Mark McGarry
DATE: 27/02/2015
REPORT NUMBER: 2015034(1)

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Document Amendment Record

Client: Axis Environmental Ltd

Title: Dispersion modelling assessment of classical air pollutants from named emission point located in Rehab Glassco Ltd, Oberstown Industrial Park, Naas, Co. Kildare.

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| | | | | | |
|-------------------------------------------------------------------------------------|----------------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------|
| Project Number: 2015034(1) | | | DOCUMENT REFERENCE: Dispersion modelling assessment of classical air pollutants from named emission point located in Rehab Glassco Ltd, Oberstown Industrial Park, Naas, Co. Kildare. | | |
| 2015034(1) | Document for review | B.A.S. | JMC | B.A.S | 27/02/2015 |
| | | | | | |
| | | | | | |
| Revision | Purpose/Description | Originated | Checked | Authorised | Date |
|  | | | | | |

EXECUTIVE SUMMARY

Odour Monitoring Ireland was commissioned by Axis Environmental Ltd to perform a classical air pollutants air quality dispersion modelling assessment of the existing and proposed dryer process operations to be located in Rehab Glassco Ltd, Oberstown Industrial Park, Naas, Co. Kildare. The proposed emission limit values based on actual measurements for Volume flow, Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, Total particulates and Total organic carbon on emission point glass dryer emission point was utilised in conjunction with source characteristics within the dispersion modelling assessment. This was used to assess compliance with SI180 of 2011 and Directive 2008/50/EC, where applicable.

Dispersion modelling assessment was performed utilising AERMOD Prime (12060) dispersion model. Five years of hourly sequential meteorological data from Casement (2004 to 2008 inclusive) was used within the dispersion model (Worst case year 2004). The total mass limit emission rate of Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, Total particulates and Total Organic Carbon was inputted with source characteristics for the existing and proposed operations into the dispersion model in order to assess compliance with SI180 of 2011 and 2008/50/EC CAFÉ directive on air quality.

The following conclusions are drawn from the study:

1. The assessment was carried out to provide information in line with relevant information for investigation of downwind impact from a facility.
2. Specific dispersion modelling was performed for Carbon monoxide, Oxides of nitrogen, Sulphur dioxide Particulate matter (PM₁₀ and PM_{2.5}) and Total organic carbon.
3. With regard to Carbon monoxide, the maximum GLC+Baseline predicted at the worst case sensitive receptor for Carbon monoxide is 440 µg/m³ for the maximum 8-hour mean concentration at the 100th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is less than or equal to 4.40% of the impact criterion for emissions from the combined existing and proposed operations.
4. With regard to Oxides of nitrogen, the maximum GLC+Baseline at the worst case sensitive receptor for Oxides of nitrogen is 31.80 µg/m³ for the maximum 1-hour mean concentration at the 99.79th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is less than or equal to 15.90% of the impact criterion for emissions from the combined existing and proposed operations. An annual average was also generated to allow comparison with the SI 180 of 2011 and Directive 2008/50/EC for Oxides of nitrogen. The maximum predicted annual average + baseline ground level concentration at the worst case sensitive receptor for NO₂ is 14 µg/m³. When compared, the annual average NO₂ air quality impact is less than or equal to 35% of the impact criterion for emissions from the combined existing and proposed operations.
5. With regards to Sulphur dioxide, the maximum GLC+Baseline at the worst case sensitive receptor for Sulphur dioxide is 34 and 18 µg/m³ for the maximum 1 hr and 24-hour mean concentration at the 99.73th and 99.18th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is 9.70 and 14.40% of the impact criterion for emissions from the combined existing and proposed operations. The maximum predicted annual average + baseline ground level concentration at the nearest worst case sensitive receptor for SO₂ is 8.0 µg/m³. When compared, the annual average SO₂ air quality impact is less than or equal to 40% of the impact criterion for emissions from the combined existing and proposed operations.
6. With regard to Total particulates as PM_{10/2.5}, the maximum GLC+Baseline at the worst case sensitive receptors for Total particulates as PM₁₀ is 24 µg/m³ for the maximum 24-hour mean concentration at the 90.40th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is less than or equal to 48% of the impact criterion for emissions from the combined existing and proposed operations. An annual average was also generated to allow comparison with the SI 180 of 2011 and Directive 2008/50/EC for Total particulates as PM₁₀ and PM_{2.5}. The maximum predicted annual average + baseline ground level

concentration at the nearest worst case sensitive receptor for Total particulates as PM_{10} and $PM_{2.5}$ is 20 and 13 $\mu\text{g}/\text{m}^3$. When compared, the annual average Total particulates as PM_{10} and $PM_{2.5}$ air quality impact is less than or equal to 50 and 52% of the impact criterion for emissions from the combined existing and proposed operations.

7. With regard to Total Organic Carbon, the maximum GLC at worst case sensitive receptors for TOC is 7.0 $\mu\text{g}/\text{m}^3$ for the maximum annual average concentration.

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1. Introduction and scope

1.1 Introduction

Odour Monitoring Ireland was commissioned by Axis Environmental Ltd to perform a dispersion modelling assessment of existing and proposed air emissions from the glass drying processes located in Rehab Glassco for Carbon monoxide, Oxides of nitrogen, Sulphur dioxide Total particulates and Total organic carbon which could potentially be emitted from the onsite glass dryers located in Oberstown Industrial Park, Naas, Co. Kildare.

The assessment allowed for the examination of proposed short and long term ground level concentrations (GLC's) of Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, Total particulates and Total organic carbon as a result of existing and proposed operations located at the facility.

Predicted dispersion modelling GLC's were compared to regulatory / guideline ground level limit values for Carbon monoxide, Oxides of nitrogen, Sulphur dioxide Total particulates and Total organic carbon contained in SI180 of 2011 and Directive 2008/50/EC.

The materials and methods, results, discussion of results and conclusions are presented within this document.

1.2 Scope of the work

The main aims of the study included:

- Calculation of total mass emission rate of Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, total particulates and Total organic carbon from the existing and proposed emission point A1-1 and A1-2 for use within a dispersion modelling assessment.
- Dispersion modelling assessment of Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, Total particulates and Total organic carbon emission limit values in accordance with EPA guidance AG4.
- Assessment of whether the predicted ground level concentrations of Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, Total particulates and Total organic carbon from the two emission points (A1-1 and A1-2) is in compliance with ground level concentration limit values at receptors in the vicinity of the facility (as taken from SI 180 of 2011 and Directive 2008/50/EC).

1.3 Model assumptions

The approach adopted in this assessment is considered a worst-case investigation in respect of Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, Total particulates and Total organic carbon emissions to the atmosphere from the existing and proposed operations of the emission points. These predictions are therefore most likely to over estimate the GLC that may actually occur for each modelled scenario. These assumptions are summarised and include:

- Emissions to the atmosphere from the existing operations were assumed to occur 24 hours each day / 7 days per week, 365 days per year, 100% output for all sources.
- Five years of hourly sequential meteorological data from Casement 2004 to 2008 inclusive was used in the modelling screen which will provide statistical significant results in terms of the short and long term assessment. The worst case year 2004 was used for data analysis. This is in keeping with current national and international recommendations (EPA Guidance AG4). In addition, AERMOD incorporates a meteorological pre-processor AERMET PRO. The AERMET PRO meteorological pre-processor requires the input of surface characteristics, including surface roughness

(z0), Bowen Ratio and Albedo by sector and season, as well as hourly observations of wind speed, wind direction, cloud cover, and temperature. The values of Albedo, Bowen Ratio and surface roughness depend on land-use type (e.g., urban, cultivated land etc.) and vary with seasons and wind direction. The assessment of appropriate land-use type was carried out to a distance of 10km from the meteorological station for Bowen Ratio and Albedo and to a distance of 1km for surface roughness in line with USEPA recommendations.

- Maximum GLC's at receptors beyond the facility boundary + Background were compared with relevant air quality limits values.
- All emissions were assumed to occur at maximum potential emission concentration and mass emission rates for each scenario and were assumed to occur for 24 hours per day, 365 days per year.
- AERMOD Prime (12060) dispersion modelling was utilised throughout the assessment in order to provide the most conservative dispersion estimates.
- All building wake effects that could occur within the site were assessed within the dispersion model using the Prime algorithm and appropriate site maps.
- 10 m spaced topographical data was inputted into the model in order to take account of the rolling terrain in the vicinity of the site and to ensure receptor heights were appropriate.

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2. Materials and methods

This section describes the materials and methods used throughout the dispersion modelling assessment.

2.1 Dispersion modelling assessment

2.1.1 Atmospheric dispersion modelling of air quality: What is dispersion modelling?

Any material discharged into the atmosphere is carried along by the wind and diluted by wind turbulence, which is always present in the atmosphere. This process has the effect of producing a plume of air that is roughly cone shaped with the apex towards the source and can be mathematically described by the Gaussian equation. Atmospheric dispersion modelling has been applied to the assessment and control of emissions for many years, originally using Gaussian form ISCST 3. Once the compound emission rate from the source is known, (g s^{-1}), the impact on the vicinity can be estimated. These models can effectively be used in three different ways:

- Firstly, to assess the dispersion of compounds;
- Secondly, in a “reverse” mode, to estimate the maximum compound emissions which can be permitted from a site in order to prevent air quality impact occurring;
- And thirdly, to determine which process is contributing greatest to the compound impact and estimate the amount of required abatement to reduce this impact to within acceptable levels (McIntyre et al. 2000).

In this latter mode, models have been employed for imposing emission limits on industrial processes, control systems and existing facilities and processes (Sheridan et al., 2002).

Any dispersion modelling approach will exhibit variability between the predicted values and the measured or observed values due to the natural randomness of the atmospheric environment. A model prediction can, at best, represent only the most likely outcome given the apparent environmental conditions at the time. Uncertainty depends on the completeness of the information used as input to the model as well as the knowledge of the atmospheric environment and the ability to represent that process mathematically. Good input information (emission rates, source parameters, meteorological data and land use characteristics) entered into a dispersion model that treats the atmospheric environment simplistically will produce equally uncertain results as poor information entered into a dispersion model that seeks to simulate the atmospheric environment in a robust manner. It is assumed in this discussion that pollutant emission rates are representative of maximum emission events, source parameters accurately define the point of release and surrounding structures, meteorological conditions define the local atmospheric environment and land use characteristics describe the surrounding natural environment. These conditions are employed within the dispersion modelling assessment therefore providing good confidence in the generated predicted exposure concentration values.

2.1.2 Atmospheric dispersion modelling of air quality: dispersion model selection

The AERMOD model was developed through a formal collaboration between the American Meteorological Society (AMS) and U.S. Environmental Protection Agency (U.S. EPA). AERMOD is a Gaussian plume model and replaced the ISC3 model in demonstrating compliance with the National Ambient Air Quality Standards (Porter et al., 2003) AERMIC (USEPA and AMS working group) is emphasizing development of a platform that includes air turbulence structure, scaling, and concepts; treatment of both surface and elevated sources; and simple and complex terrain. The modelling platform system has three main components: AERMOD, which is the air dispersion model; AERMET, a meteorological data pre-processor; and AERMAP, a terrain data pre-processor (Cora and Hung, 2003).

AERMOD is a Gaussian steady-state model which was developed with the main intention of superseding ISCST3 (NZME, 2002). The AERMOD modeling system is a significant departure from ISCST3 in that it is based on a theoretical understanding of the atmosphere rather than depend on empirical derived values. The dispersion environment is characterized by turbulence theory that defines convective (daytime) and stable (nocturnal) boundary layers instead of the stability categories in ISCST3. Dispersion coefficients derived from turbulence theories are not based on sampling data or a specific averaging period. AERMOD was especially designed to support the U.S. EPA's regulatory modeling programs (Porter et al., 2003)

Special features of AERMOD include its ability to treat the vertical in-homogeneity of the planetary boundary layer, special treatment of surface releases, irregularly-shaped area sources, a three plume model for the convective boundary layer, limitation of vertical mixing in the stable boundary layer, and fixing the reflecting surface at the stack base (Curran et al., 2006). A treatment of dispersion in the presence of intermediate and complex terrain is used that improves on that currently in use in ISCST3 and other models, yet without the complexity of the Complex Terrain Dispersion Model-Plus (CTDMPLUS) (Diosey et al., 2002).

Input data from stack emissions, and source characteristics were used to construct the basis of the modelling scenarios.

2.2 Air quality impact assessment criteria

The predicted air quality impact from the operation of the existing emission points for each scenario is compared to relevant air quality objectives and limits. Air quality standards and guidelines referenced in this report include:

- SI 180 of 2011 – Air Quality Standards Regulations 2011.
- EU limit values laid out in the Directive on Air Quality 2008/50/EC.

Air quality is judged relative to the relevant Air Quality Standards, which are concentrations of pollutants in the atmosphere, which achieve a certain standard of environmental quality. Air quality Standards are formulated on the basis of an assessment of the effects of the pollutant on public health and ecosystems.

In general terms, air quality standards have been framed in two categories, limit values and guideline values. Limit values are concentrations that cannot be exceeded and are based on WHO guidelines for the protection of human health. Guideline values have been established for long-term precautionary measures for the protection of human health and the environment. European legislation has also considered standard for the protection of vegetation and ecosystems.

The relevant air quality standards for the existing emission sources are presented in *Table 2.1*.

2.2.1 Air Quality Guidelines value for Classical air pollutants

Table 2.1 illustrates the guideline and limit values for classical air quality pollutants in Ireland.

Table 2.1. EU and Irish Limit values laid out in the SI 180 of 2011 and 2008/50/EC.

| POLLUTANT | Objective | | | |
|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------|
| | Concentration | Maximum No. Of exceedences allowed | Exceedence expressed as percentile | Measured as |
| Carbon monoxide (CO) | 10 mg m ⁻³ | None | 100 th percentile | Running 8 hour mean |
| Oxides of nitrogen (2008/50/EC and SI180 of 2011) | 300 µg m ⁻³ NO ₂ 200 µg m ⁻³ NO ₂ 40 µg m ⁻³ NO ₂ | 18 times in a year 18 times in a year -- | 99.79 th percentile 99.79 th percentile -- | 1 hour mean 1 hour mean Annual mean |
| Sulphur dioxide | 350 µg m ⁻³ 125 µg m ⁻³ 20 µg m ⁻³ | 24 times in a year 3 times in a year -- | 99.73 th percentile 99.18 th percentile -- | 1 hour mean 24 hour mean Annual mean and winter mean |
| Particulates (PM10) (2008/50/EC and SI180 of 2011) | 50 µg m ⁻³ 40 µg m ⁻³ 20 µg m ⁻³ | 35 times in a year None None | 90.40 th percentile -- -- | 24 hour mean Annual mean Annual mean |
| Particulates (PM2.5) (2008/50/EC and SI180 of 2011) | 25 µg m ⁻³ – Stage 1 20 µg m ⁻³ – Stage 2 | None None | -- -- | Annual mean Annual mean |
| TOC | -- µg m ⁻³ -- µg m ⁻³ | None None | -- -- | Annual mean 1hr max |

2.3 Existing Baseline Air Quality

The EPA has been monitoring national Air quality from a number of sites around the country. This information is available from the EPA's website. The values presented for Carbon monoxide, Oxides of Nitrogen Sulphur dioxide and Total particulates as PM_{10, 2.5} give an indication of expected imissions of these pollutants are listed in *Table 2.1*. *Table 2.2* illustrates the baseline data expected to be obtained from a zone D area for these classical air pollutants. The existing facility would be considered to be located in a Zone D area according to the EPA's classification of zones for air quality (www.epa.ie). Traffic and industrial related emissions would be low to low / medium.

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Table 2.2. Baseline air quality data used to assess air quality impact criterion in a number of Zone D region.

| Reference air quality data – Source identity | Annual average Carbon monoxide conc. ($\mu\text{g m}^{-3}$) | Annual average Oxides of nitrogen conc. ($\mu\text{g m}^{-3}$) | Annual average Sulphur dioxide Conc. ($\mu\text{g m}^{-3}$) | Annual average Total particulates conc ($\mu\text{g m}^{-3}$) | Details |
|-------------------------------------------------|---------------------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------------------------|-----------------------------------------------------------------------|---------------|
| Castlebar | - | 11 | - | 15 | Measured 2013 |
| Kilkitt | - | 4 | 3 | 11 | Measured 2013 |
| Shannon Estuary | - | - | 2 | - | Measured 2013 |
| Emo | - | 4 | - | - | Measured 2013 |
| Claremorris | - | - | - | 13 (8) | Measured 2013 |
| Mullingar (zone C) | 300 | - | - | - | Measured 2013 |

Notes: ¹ denotes taken from Air quality in Ireland 2013 – Key indicators of ambient air quality, www.epa.ie.

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2.4 Meteorological data

Five years of hourly sequential meteorological data was chosen for the modelling exercise (i.e. Casement 2004 to 2008 inclusive). A schematic wind rose and tabular cumulative wind speed and directions of all five years are presented in *Section 7*. All five years of met data was screened to provide more statistically significant result output from the dispersion model. The worst case year 2004 was used for data presentation. This is in keeping with national and international recommendations on quality assurance in operating dispersion models and will provide a worst case assessment of predicted ground level concentrations based on the input emission rate data. Surface roughness, Albedo and Bowen ratio were assessed and characterised around Casement met station for AERMET Pro processing.

2.5 Terrain data

Topography effects were not accounted for within the dispersion modelling assessment as terrain was considered simple in the vicinity of the site with no significant deviations in the topography relative to the overall stack height. In addition, maximum ground level concentrations were predicted within the site boundary thereby eliminating any effects that deviations in terrain could have on predicted ground level concentrations.

2.6 Building wake effects

Building wake effects are accounted for in modelling scenarios through the use of the Prime algorithm (i.e. all building features located within the facility were assessed and the effects of same on plume grounding and dispersion) as this can have a significant effect on the compound plume dispersion at short distances from the source and can significantly increase GLC's in close proximity to the facility. All building structures and stack heights and orientations were inputted into the dispersion model in order to allow for wake effects to be taken in to account in the calculations.

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3. Results

This section describes the results obtained from the dispersion modelling assessment of emissions from the existing and proposed operation located in Rehab Glassco Limited facility. All input data and source characteristics were developed in conjunction with engineering drawings and source characteristics for the emission point supplied by Axis Environmental Ltd.

3.1. Dispersion model input data – Source characteristics and input data

Table 3.1 illustrates the source characteristics utilised within the dispersion model for the named emission point. Grid reference location, stack height (A.G.L), maximum volume flow and temperature of the emission point(s) are presented within this table for reference purposes.

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Table 3.1. Source characteristics for existing emission point – A1-1 and proposed emission point A1-2 – Glass drier stacks

| Emission point identity | A1-1 – Existing glass drier emission point | A1-2 – Proposed glass drier emission point |
|-----------------------------------------------------------|-----------------------------------------------------------------------------------|---------------------------------------------------|
| X cord(m) | 286765.9 | 286811 |
| Y cord (m) | 220378.9 | 220296 |
| Finish floor level (m) | 78 | 78 |
| Stack height (m) | 7.50 | 13 |
| Temp (K) | 423.15 | 343.15 |
| Efflux velocity (m) | 22.07 | 17.55 |
| Stack tip dia. dimensions (m) | 0.50 | 0.45 |
| Worst case building height (m) | 8.34 (Drier building), there are other buildings higher but not next to the stack | 12 (Drier building) |
| Stack orientation (m) | Vertical | Vertical |
| Volumetric airflow rate (Nm ³ /hr dry ref) | 9,000 | 8,000 |
| Volumetric airflow rate (Am ³ /hr wet) | 15,593 | 10,048 |
| Carbon monoxide flue gas conc. (mg/Nm ³) | 300 | 300 |
| Oxides of nitrogen flue gas conc. (mg/Nm ³) | 50 | 50 |
| Sulphur dioxide flue gas conc. (mg/Nm ³) | 50 | 50 |
| Total particulates flue gas conc. (mg/Nm ³) | 50 | 50 |
| Total organic carbon flue gas conc. (mg/Nm ³) | 80 | 80 |
| Carbon monoxide mass emission rate (g/s) | 0.75 | 0.67 |
| Oxides of nitrogen mass emission rate (g/s) | 0.125 | 0.11 |
| Sulphur dioxide mass emission rate (g/s) | 0.125 | 0.11 |
| Total particulates mass emission rate (g/s) | 0.125 | 0.11 |
| Total organic carbon mass emission rate (g/s) | 0.20 | 0.18 |

3.2 Dispersion modelling assessment

AERMOD Prime (12060) was used to determine the overall ground level impact of the existing emissions from the named emission point operating 24/7/365 days per year. These computations give the relevant GLC's at each 25 and 150-meter X Y Cartesian grid receptor location that is predicted to be exceeded for the specific air quality impact criteria. Receptor elevations were established at 1.80 m height above ground (normal breathing zone). A total Cartesian receptors grid of 2,357 points was established within the dispersion model giving a fine and course grid coverage of 1.0 km sq and 14.10 km sq centred on the exhaust stack.

Five years of hourly sequential meteorological data from Casement (Casement 2004 to 2008 inclusive) was screened with the worst case year 2004 been used for results presentation. Source characteristics as detailed in *Table 3.1* including emission data contained in *Table 3.1*) was inputted into the dispersion model.

Various averaging intervals were chosen to allow direct comparison of predicted GLC's with the relevant pollutant air quality assessment criteria as outlined in *Table 2.1*. In particular, 1 hr, 8 hr, 24-hour, percentile and annual average GLC's of the pollutants were calculated at distances from the site. Relevant percentiles of these GLC's were also computed for comparison with the relevant Air Quality Standards.

For modelling classical air pollutants and in order to obtain the predicted environmental concentration (PEC), background data was added to the process emissions. In relation to the annual averages, the ambient background concentration was added directly to the process concentration. However, in relation to the short-term peak 1 hr concentrations, concentrations due to emissions from elevated sources cannot be combined in the same way. Guidance from the UK Environment Agency advises that an estimate of the maximum combined pollutant concentration can be obtained by adding the maximum short-term concentration due to emissions from the source to twice the annual mean background concentration.

In modelling air dispersion of NO_x from combustion sources, the source term should be expressed as NO₂, e.g., NO_x mass (expressed as NO₂). Some of the exhaust air is made up of NO while some is made up of NO₂. NO will be converted in the atmosphere to NO₂ but this will depend on a number of factors to include Ozone and VOC concentrations. In order to take account of this conversion the following screening can be performed.

Worse case scenario treatment

35% for short-term and 70% for long-term average concentration should be considered to assess compliance with the relevant air quality objective.

This is in accordance with recommendations from the Environmental Agency UK for the dispersion modelling of NO₂ emissions from combustion processes, www.environmentagency.gov.uk

3.3 Dispersion modelling scenarios

Ten distinct scenarios were assessed within the dispersion model. The output data was analysed to calculate the following:

- Ref Scenario 1:** Predicted Carbon monoxide emission contribution of all exhaust emission points to plume dispersal at the 100th percentile of an 8 hour average for an Carbon monoxide concentration of less than or equal to 200 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.2).
- Ref Scenario 2:** Predicted Oxides of nitrogen emission contribution of all exhaust emission points to plume dispersal at the 99.79th percentile of an 1 hour average for an Oxides of nitrogen concentration of less than or equal to 14 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.3).
- Ref Scenario 3:** Predicted Oxides of nitrogen emission contribution of all exhaust emission points to Oxides of nitrogen plume dispersal for the Annual average for an Oxides of nitrogen concentration of less than or equal to 2.8 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.4).
- Ref Scenario 4:** Predicted Sulphur dioxide emission contribution of all exhaust emission points to plume dispersal at the 99.73th percentile of an 1 hour average for an Sulphur dioxide concentration of less than or equal to 30 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.5).
- Ref Scenario 5:** Predicted Sulphur dioxide emission contribution of exhaust stack of all exhaust emission points to plume dispersal at the 99.18th percentile of an 24 hour average for an Sulphur dioxide concentration of less than or equal to 20 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.6).
- Ref Scenario 6:** Predicted Sulphur dioxide emission contribution of all exhaust emission points to Sulphur dioxide plume dispersal for the Annual average for an Sulphur dioxide concentration of less than or equal to 4.0 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.7).
- Ref Scenario 7:** Predicted Total particulates as PM₁₀ emission contribution of all exhaust stack of exhaust emission points to plume dispersal at the 90.4th percentile of an 24 hour average for an Total particulates as PM₁₀ concentration of less than or equal to 8.0 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.8).
- Ref Scenario 8:** Predicted Total particulates as PM₁₀ emission contribution of all exhaust emission points to plume dispersal for the Annual average for an Total particulates as PM₁₀ concentration of less than or equal to 4.0 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.9).
- Ref Scenario 9:** Predicted Total particulates as PM_{2.5} emission contribution of all exhaust emission points to plume dispersal for the Annual average for an Total particulates as PM_{2.5} concentration of less than or equal to

4.0 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.10).

Ref Scenario 10:

Predicted TOC emission contribution of all exhaust emission points to plume dispersal for the Annual average for a TOC concentration of less than or equal to 6 $\mu\text{g}/\text{m}^3$ for 5 years of screened hourly sequential meteorological data (worst case year Casement 2004) (see Figure 6.11).

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4. Results and Discussion of results

This section will describe the results obtained throughout the study.

AERMOD GIS Pro Prime (Ver. 12060) was used to determine the overall air quality impact of existing operations at Rehab Glassco Ltd, Oberstown Industrial Park, Naas, Co. Kildare. *Table 4.1* illustrates the tabular concentration results at each of the sensitive receptors in the vicinity of the facility.

Predicted GLC's presented within these tables will allow for comparison with SI 180 of 2011 and Directive 2008/50/EC guideline and limit values.

4.1 Assessment of air quality impacts for pollutants from named emission points.

Table 4.1 presents the comparison between model predictions at each sensitive receptor for air quality impacts for Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, Total particulates and TOC and the maximum percentage value of the air quality impact criterion.

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Table 4.1. Predicated combined baseline and ground level concentration of named pollutant at each sensitive receptor and at or beyond the facility boundary.

| Receptor identity | X coordinate (m) | Y coordinate (m) | Scen 1 ($\mu\text{g}/\text{m}^3$) | Scen 2 ($\mu\text{g}/\text{m}^3$) | Scen 3 ($\mu\text{g}/\text{m}^3$) | Scen 4 ($\mu\text{g}/\text{m}^3$) | Scen 5 ($\mu\text{g}/\text{m}^3$) | Scen 6 ($\mu\text{g}/\text{m}^3$) | Scen 7 ($\mu\text{g}/\text{m}^3$) | Scen 8 ($\mu\text{g}/\text{m}^3$) | Scen 9 ($\mu\text{g}/\text{m}^3$) | Scen 10 ($\mu\text{g}/\text{m}^3$) |
|-------------------------------------------------------------------------------------|------------------|------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------------------|
| R1 | 286532 | 220570 | 25.10 | 2.74 | 0.15 | 7.28 | 1.81 | 0.22 | 0.64 | 0.22 | 0.22 | 0.35 |
| R2 | 286616 | 220551 | 35.83 | 3.91 | 0.23 | 10.65 | 2.35 | 0.33 | 1.02 | 0.33 | 0.33 | 0.53 |
| R3 | 286620 | 220505 | 47.57 | 4.63 | 0.30 | 12.78 | 3.40 | 0.43 | 1.31 | 0.43 | 0.43 | 0.69 |
| R4 | 286727 | 220568 | 45.82 | 4.06 | 0.34 | 11.15 | 3.13 | 0.49 | 1.22 | 0.49 | 0.49 | 0.79 |
| R5 | 286777 | 220578 | 40.05 | 4.46 | 0.45 | 11.97 | 2.96 | 0.65 | 1.76 | 0.65 | 0.65 | 1.04 |
| R6 | 286821 | 220579 | 42.08 | 4.65 | 0.63 | 13.03 | 3.68 | 0.91 | 2.18 | 0.91 | 0.91 | 1.46 |
| R7 | 286638 | 220334 | 72.60 | 5.46 | 0.78 | 15.38 | 7.74 | 1.11 | 3.67 | 1.11 | 1.11 | 1.79 |
| R8 | 286651 | 220238 | 54.04 | 4.03 | 0.52 | 11.31 | 5.31 | 0.74 | 2.23 | 0.74 | 0.74 | 1.20 |
| R9 | 286887 | 220363 | 61.19 | 4.17 | 2.73 | 11.72 | 8.12 | 3.90 | 6.65 | 3.90 | 3.90 | 6.34 |
| R10 | 286692 | 220177 | 54.41 | 5.10 | 0.38 | 12.44 | 4.89 | 0.54 | 1.43 | 0.54 | 0.54 | 0.88 |
| R11 | 286826 | 220212 | 104.76 | 6.77 | 0.57 | 18.84 | 7.47 | 0.82 | 1.99 | 0.82 | 0.82 | 1.33 |
| R12 | 286831 | 220180 | 82.67 | 6.14 | 0.47 | 16.66 | 5.86 | 0.67 | 1.58 | 0.67 | 0.67 | 1.09 |
| R13 | 286825 | 220153 | 67.10 | 5.53 | 0.38 | 15.35 | 4.73 | 0.55 | 1.06 | 0.55 | 0.55 | 0.89 |
| Max predicted value ($\mu\text{g}/\text{m}^3$) | - | - | 104.76 | 6.77 | 2.73 | 18.84 | 8.12 | 3.90 | 6.65 | 3.90 | 3.90 | 6.34 |
| Baseline value ($\mu\text{g}/\text{m}^3$) | - | - | 300 | 22 | 11 | 6 | 3 | 3 | 15 | 15 | 8 | - |
| Max predicted value at or beyond the facility boundary ($\mu\text{g}/\text{m}^3$) | - | - | 140.00 | 10 | 3 | 28.00 | 15.00 | 5.00 | 9.00 | 5.00 | 5.00 | 7.00 |
| Limit value ($\mu\text{g}/\text{m}^3$) | - | - | 10,000 | 200 | 40 | 350 | 125 | 20 | 50 | 40 | 25 | - |
| % value of impact criterion at or beyond the facility boundary | - | - | 4.40 | 15.90 | 35.0 | 9.70 | 14.40 | 40.0 | 48.0 | 50.0 | 52.0 | - |
| % value of impact criterion at receptor location | - | - | 4.0 | 14.40 | 34.30 | 7.10 | 8.90 | 34.50 | 43.30 | 47.30 | 47.60 | - |

As can be observed in *Table 4.1*, the predicted maximum averaging ground level concentration and baseline concentration at each receptor location and at or beyond the facility boundary are well within the guideline / limit value for each pollutant.

4.1.1 Carbon monoxide

The results for the potential air quality impact for dispersion modelling of Carbon monoxide based on the emission rates in *Table 3.1* are presented in *Table 4.1*. Results are presented for the maximum predicted percentile emission regime at each sensitive receptor and facility boundary. As can be observed in *Table 4.1*, the maximum GLC+Baseline predicted at the worst case sensitive receptor for Carbon monoxide is $440 \mu\text{g}/\text{m}^3$ for the maximum 8-hour mean concentration at the 100th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is less than or equal to 4.40% of the impact criterion for emissions from the combined existing and proposed operations.

4.1.2 Oxides of nitrogen

The results for the potential air quality impact for dispersion modelling of Oxides of nitrogen based on the emission rates in *Table 3.1* are presented in *Table 4.1*. Results are presented for the maximum predicted percentile emission regime at each sensitive receptor. As can be observed in *Table 4.1*, the maximum GLC+Baseline at the worst case sensitive receptor for Oxides of nitrogen is $31.80 \mu\text{g}/\text{m}^3$ for the maximum 1-hour mean concentration at the 99.79th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is less than or equal to 15.90% of the impact criterion for emissions from the combined existing and proposed operations.

An annual average was also generated to allow comparison with the SI 180 of 2011 and Directive 2008/50/EC for Oxides of nitrogen. The maximum predicted annual average + baseline ground level concentration at the worst case sensitive receptor for NO_2 is $14 \mu\text{g}/\text{m}^3$. When compared, the annual average NO_2 air quality impact is less than or equal to 35% of the impact criterion for emissions from the combined existing and proposed operations.

4.1.3 Sulphur dioxide

The results for the potential air quality impact for dispersion modelling of Sulphur dioxide based on the emission rates in *Table 3.1* are presented in *Table 4.1*. Results are presented for the maximum predicted percentile emission regime. As can be observed in *Table 4.1*, the maximum GLC+Baseline at the worst case sensitive receptor for Sulphur dioxide is 34 and $18 \mu\text{g}/\text{m}^3$ for the maximum 1 hr and 24-hour mean concentration at the 99.73th and 99.18th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is 9.70 and 14.40% of the impact criterion for emissions from the combined existing and proposed operations.

An annual average was also generated to allow comparison with the SI 180 of 2011 and Directive 2008/50/EC for Sulphur dioxide. The maximum predicted annual average + baseline ground level concentration at the nearest worst case sensitive receptor for SO_2 is $8.0 \mu\text{g}/\text{m}^3$. When compared, the annual average SO_2 air quality impact is less than or equal to 40% of the impact criterion for emissions from the combined existing and proposed operations.

4.1.4 Total particulates as PM10 and PM2.5

The results for the potential air quality impact for dispersion modelling of Total particulates based on the emission rates in *Table 3.1* are presented in *Table 4.1*. Results are presented for the maximum predicted percentile emission regime. As can be observed in *Table 4.1*, the maximum GLC+Baseline at the worst case sensitive receptors for Total particulates as PM_{10} is $24 \mu\text{g}/\text{m}^3$ for the maximum 24-hour mean concentration at the 90.40th percentile. When

combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is less than or equal to 48% of the impact criterion for emissions from the combined existing and proposed operations.

An annual average was also generated to allow comparison with the SI 180 of 2011 and Directive 2008/50/EC for Total particulates as PM₁₀ and PM_{2.5}. The maximum predicted annual average + baseline ground level concentration at the nearest worst case sensitive receptor for Total particulates as PM₁₀ and PM_{2.5} is 20 and 13 µg/m³. When compared, the annual average Total particulates as PM₁₀ and PM_{2.5} air quality impact is less than or equal to 50 and 52% of the impact criterion for emissions from the combined existing and proposed operations.

4.1.5 TOC

The results for the potential air quality impact for dispersion modelling of Total organic carbon based on the emission rates in *Table 3.1* are presented in *Table 4.1*. Results are presented for the maximum predicted percentile emission regime. As can be observed in *Table 4.1*, the maximum GLC at the worst case sensitive receptors for TOC is 7.0 µg/m³ for the maximum annual average concentration.

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5. Conclusions

Odour Monitoring Ireland was commissioned by Axis Environmental Ltd to perform a desktop dispersion modelling study in order to assess the potential Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, Total particulates and TOC air quality impact associated with existing and proposed operations at Rehab Glassco Limited facility located in Oberstown Industrial Park, Naas, Co. Kildare. Following a detailed desktop review and dispersion modelling assessment, it was demonstrated that no significant Carbon monoxide, Oxides of nitrogen, Sulphur dioxide, Total Particulates or TOC impact will occur as a result of operation of existing and proposed facility.

The following conclusions are drawn from the study:

1. The assessment was carried out to provide information in line with relevant information for investigation of downwind impact from a facility.
2. Specific dispersion modelling was performed for Carbon monoxide, Oxides of nitrogen, Sulphur dioxide Particulate matter (PM₁₀ and PM_{2.5}) and Total organic carbon.
3. With regard to Carbon monoxide, the maximum GLC+Baseline predicted at the worst case sensitive receptor for Carbon monoxide is 440 µg/m³ for the maximum 8-hour mean concentration at the 100th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is less than or equal to 4.40% of the impact criterion for emissions from the combined existing and proposed operations.
4. With regard to Oxides of nitrogen, the maximum GLC+Baseline at the worst case sensitive receptor for Oxides of nitrogen is 31.80 µg/m³ for the maximum 1-hour mean concentration at the 99.79th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is less than or equal to 15.90% of the impact criterion for emissions from the combined existing and proposed operations. An annual average was also generated to allow comparison with the SI 180 of 2011 and Directive 2008/50/EC for Oxides of nitrogen. The maximum predicted annual average + baseline ground level concentration at the worst case sensitive receptor for NO₂ is 14 µg/m³. When compared, the annual average NO₂ air quality impact is less than or equal to 35% of the impact criterion for emissions from the combined existing and proposed operations.
5. With regards to Sulphur dioxide, the maximum GLC+Baseline at the worst case sensitive receptor for Sulphur dioxide is 34 and 18 µg/m³ for the maximum 1 hr and 24-hour mean concentration at the 99.73th and 99.18th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is 9.70 and 14.40% of the impact criterion for emissions from the combined existing and proposed operations. The maximum predicted annual average + baseline ground level concentration at the nearest worst case sensitive receptor for SO₂ is 8.0 µg/m³. When compared, the annual average SO₂ air quality impact is less than or equal to 40% of the impact criterion for emissions from the combined existing and proposed operations.
6. With regard to Total particulates as PM_{10/2.5}, the maximum GLC+Baseline at the worst case sensitive receptors for Total particulates as PM₁₀ is 24 µg/m³ for the maximum 24-hour mean concentration at the 90.40th percentile. When combined predicted and baseline conditions are compared to the SI180 of 2011 and Directive 2008/50/EC, this is less than or equal to 48% of the impact criterion for emissions from the combined existing and proposed operations. An annual average was also generated to allow comparison with the SI 180 of 2011 and Directive 2008/50/EC for Total particulates as PM₁₀ and PM_{2.5}. The maximum predicted annual average + baseline ground level concentration at the nearest worst case sensitive receptor for Total particulates as PM₁₀ and PM_{2.5} is 20 and 13 µg/m³. When compared, the annual average Total particulates as PM₁₀ and PM_{2.5} air quality impact is less than or equal to 50 and 52% of the impact criterion for emissions from the combined existing and proposed operations.
7. With regard to Total Organic Carbon, the maximum GLC at worst case sensitive receptors for TOC is 7.0 µg/m³ for the maximum annual average concentration.

6. *Appendix I* - Air dispersion modelling contour plots (Process contribution only).

These contour plots are for illustrative purposes only. The pollutant contour values were selected for illustrative purposes only to allow for graphical representation of dispersion from the identified source.

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6.1 Site layout drawing and location of existing and proposed emission points.

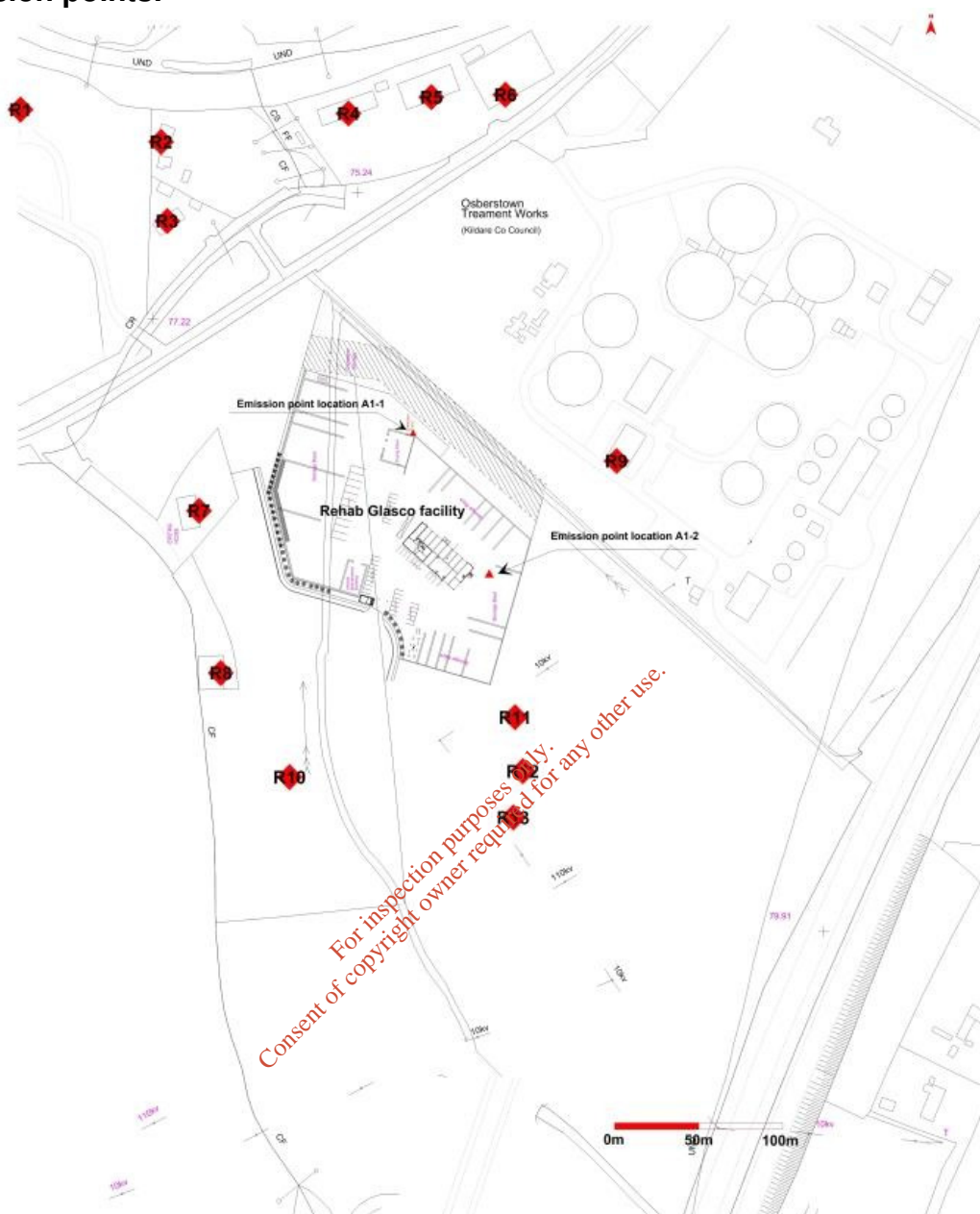


Figure 6.1. Plan view facility layout drawings for existing emission point (A1-1) and proposed emission point (A1-2) and nearest receptor locations.

6.2 Carbon monoxide contour.

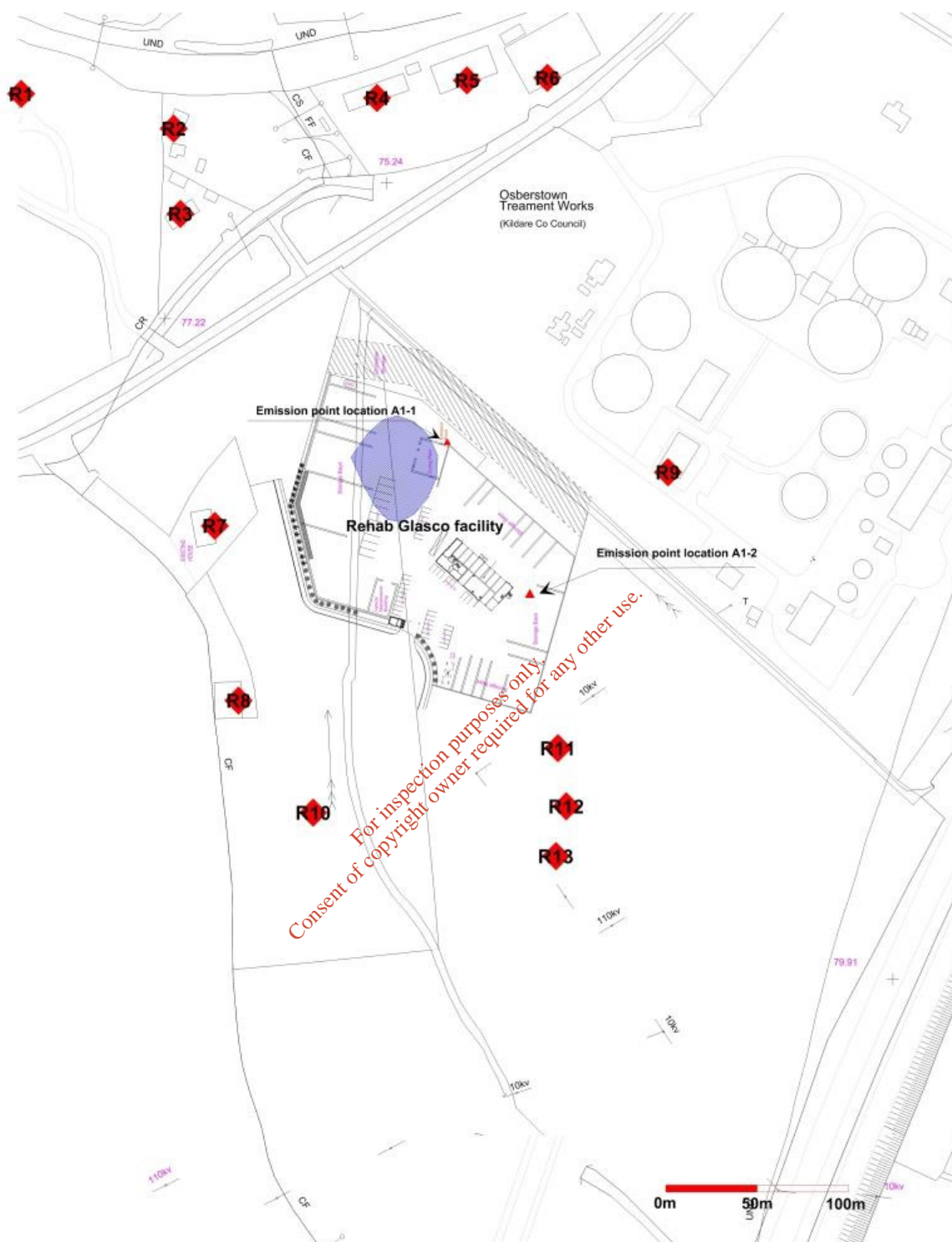


Figure 6.2. Predicted Carbon monoxide ground level concentration impact contribution of cumulative emissions from all named emission points for the 8 hr 100th %ile ground level concentration of $\leq 200 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

6.3 Oxides of nitrogen contours.

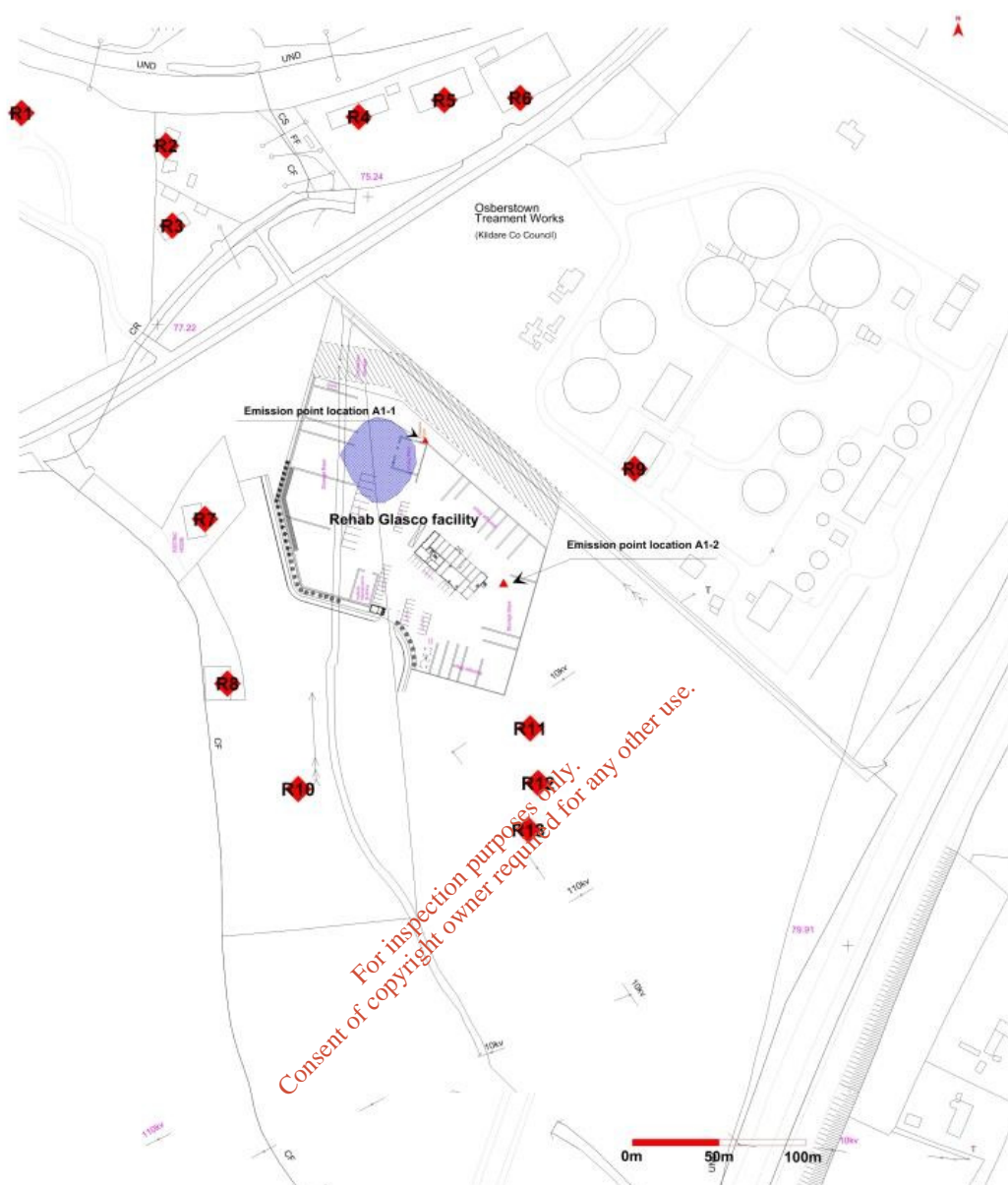


Figure 6.3. Predicted Oxides of nitrogen ground level concentration impact contribution of cumulative emissions from all named emission points for the 1 hr 99.79th %ile ground level concentration of $\le 14 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

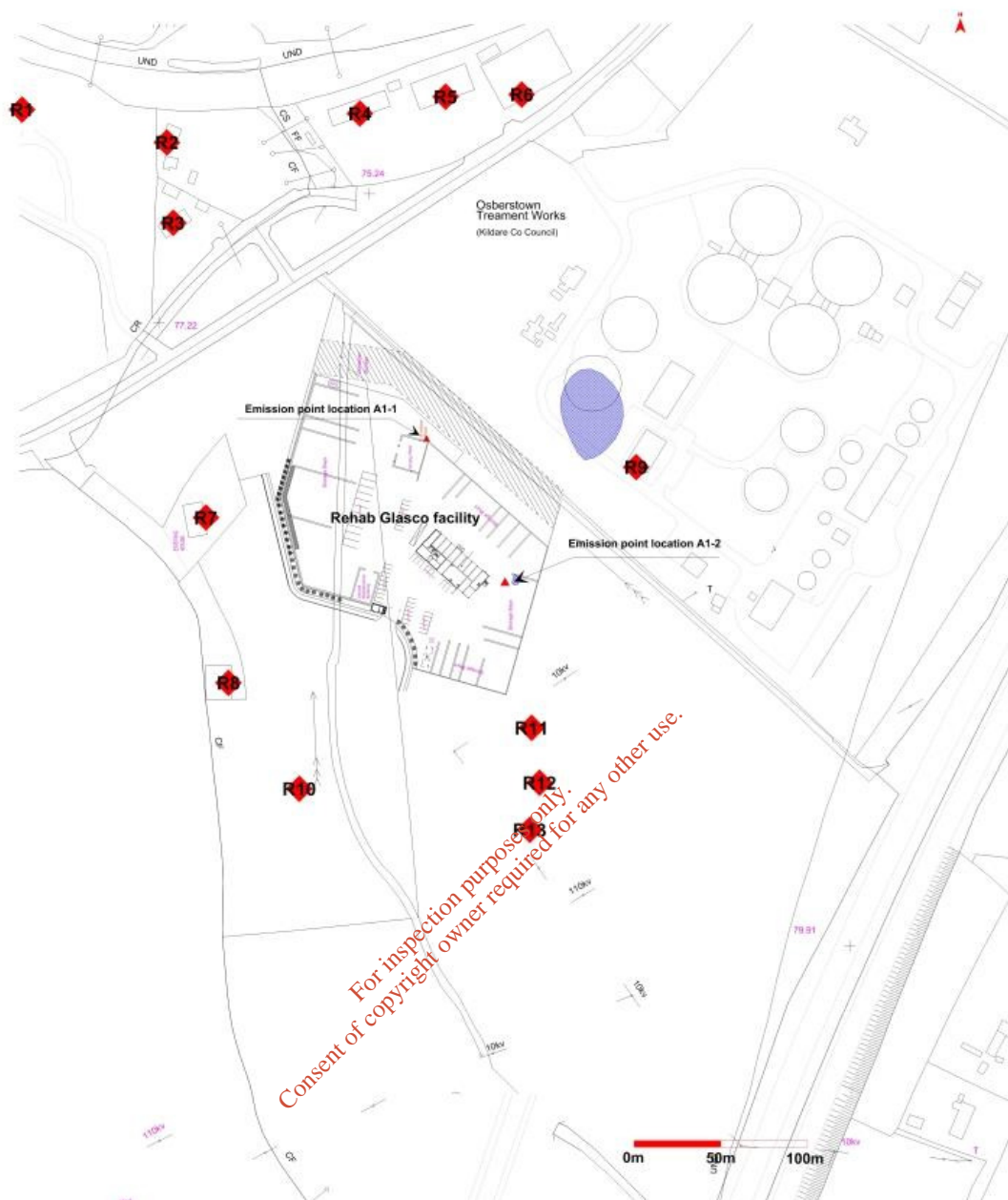


Figure 6.4. Predicted Oxides of nitrogen ground level concentration impact contribution of cumulative emissions from all named emission points for the Annual average ground level concentration of $\leq 2.8 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

6.4 Sulphur dioxide contours.

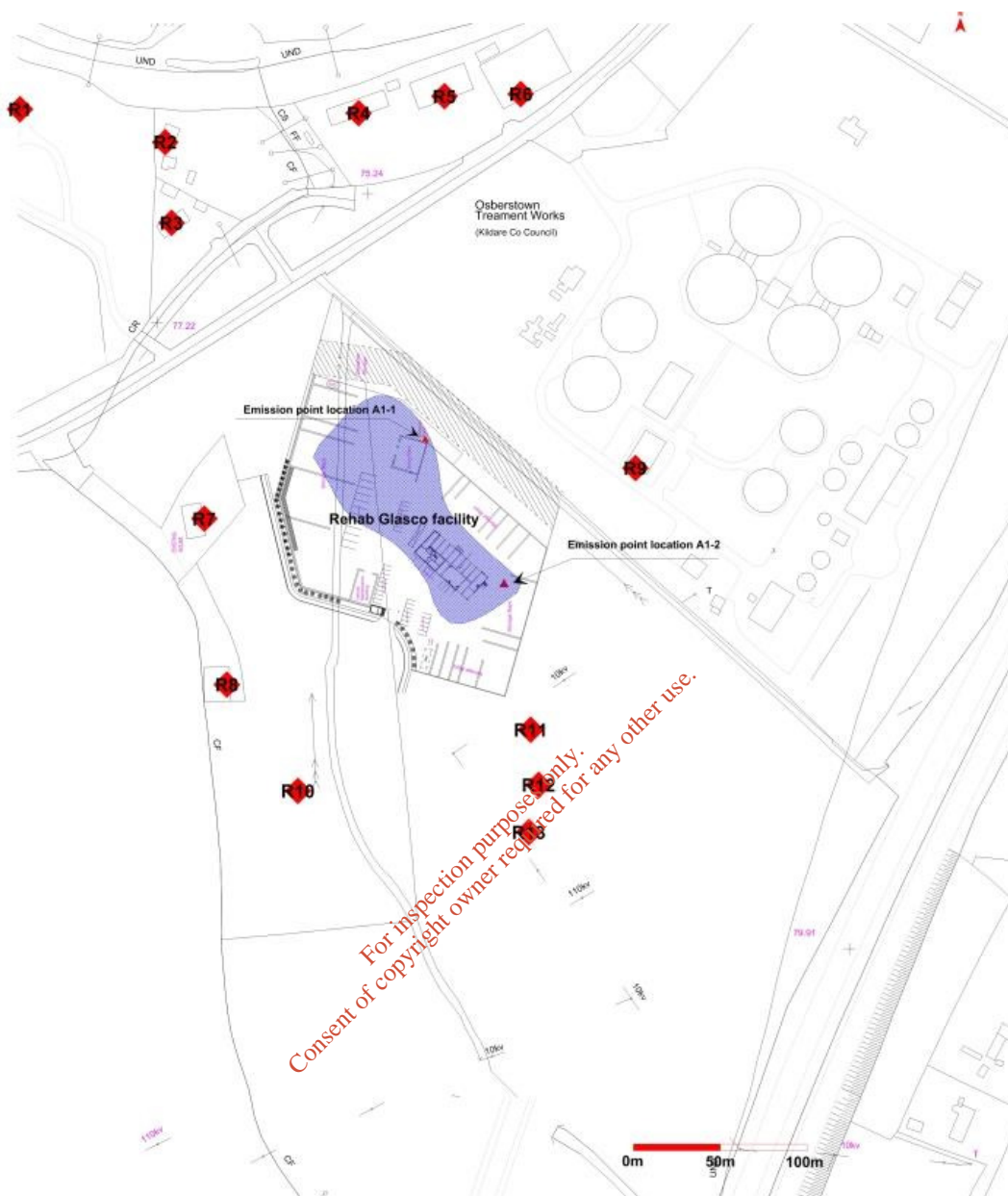


Figure 6.5. Predicted Sulphur dioxide ground level concentration impact contribution of cumulative emissions from all named emission points for the 1 hour 99.73th %ile ground level concentration of $\le 30 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

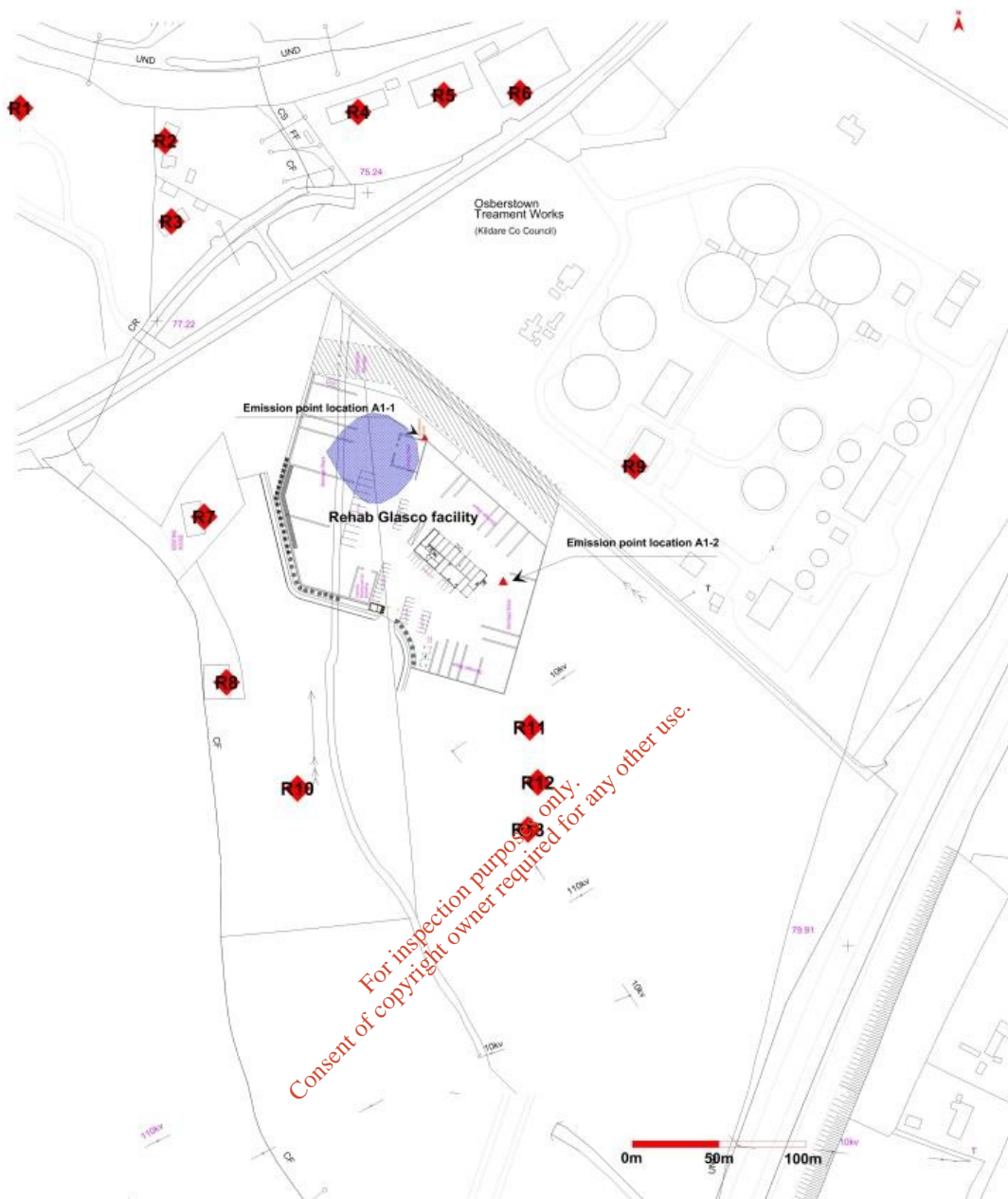


Figure 6.6. Predicted Sulphur dioxide ground level concentration impact contribution of cumulative emissions from all named emission points for the 24 hour 99.18th %ile ground level concentration of $\leq 20 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

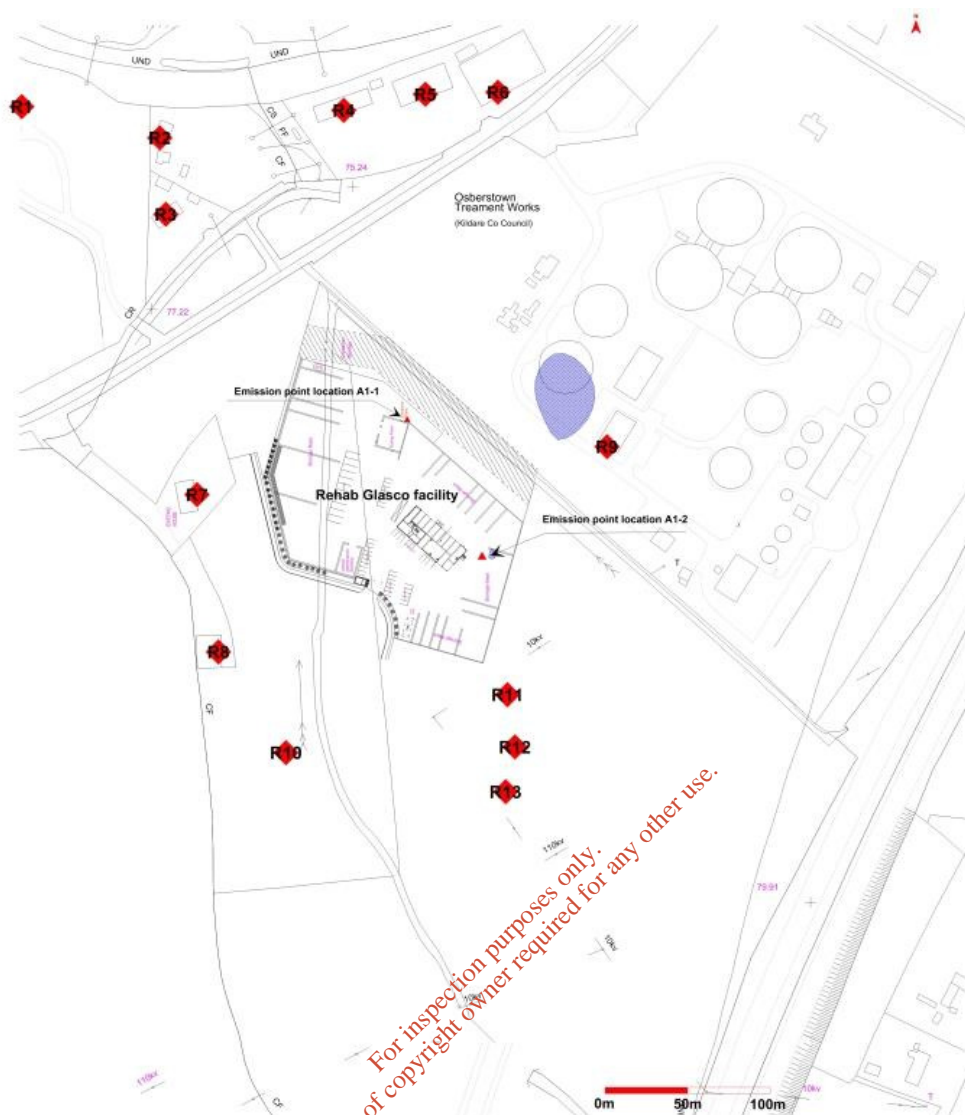


Figure 6.7. Predicted Sulphur dioxide ground level concentration impact contribution of cumulative emissions from all named emission points for the Annual average ground level concentration of $\le 4.0 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

6.5 Total particulates contours.

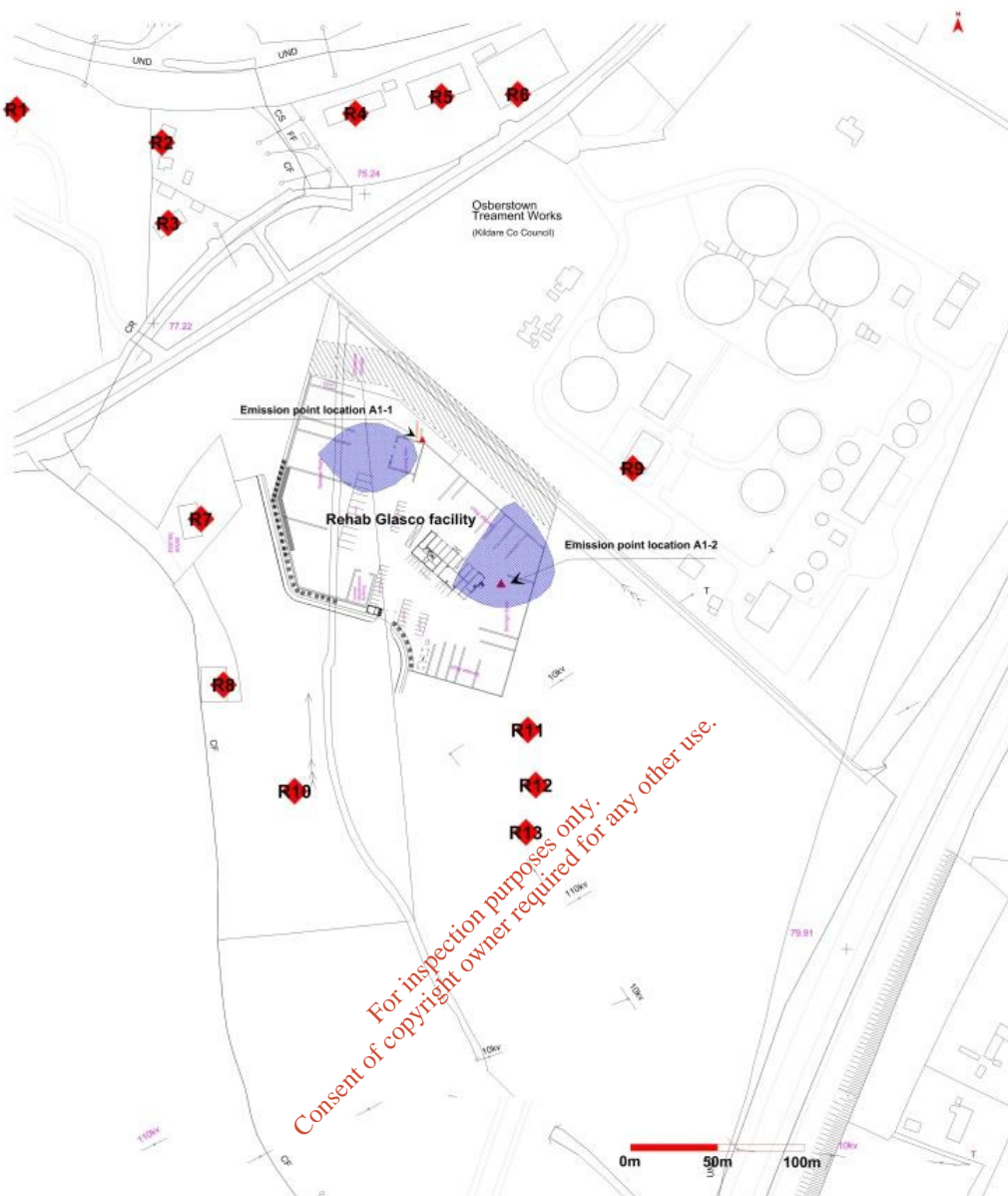


Figure 6.8. Predicted Total particulates as PM₁₀ ground level concentration impact contribution of cumulative emissions from all named emission points for the 24 hour 90.40th %ile ground level concentration of $\leq 8.0 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

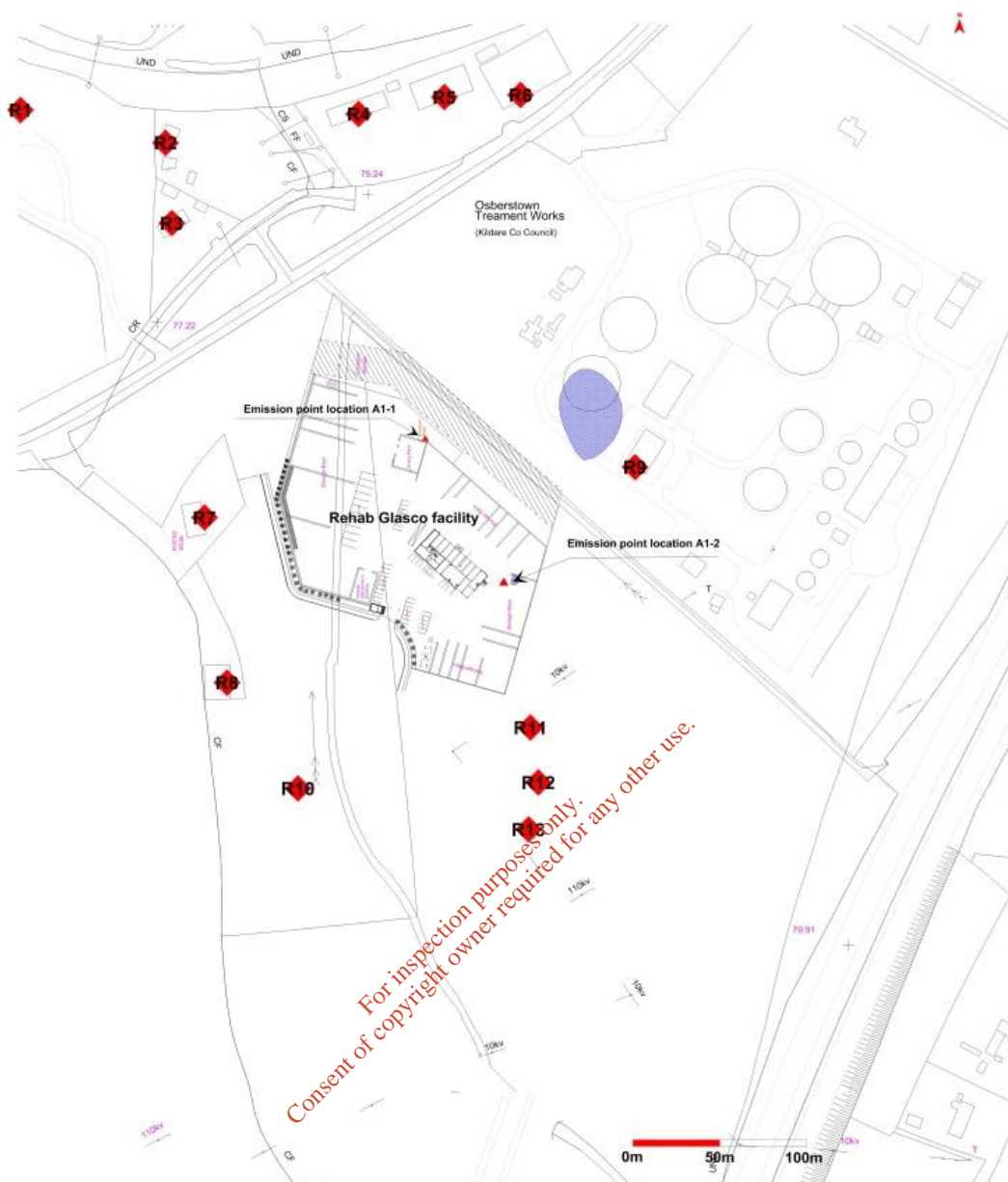


Figure 6.9. Predicted Total particulates as PM₁₀ ground level concentration impact contribution of cumulative emissions from all named emission points for the Annual average ground level concentration of $\leq 4.0 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

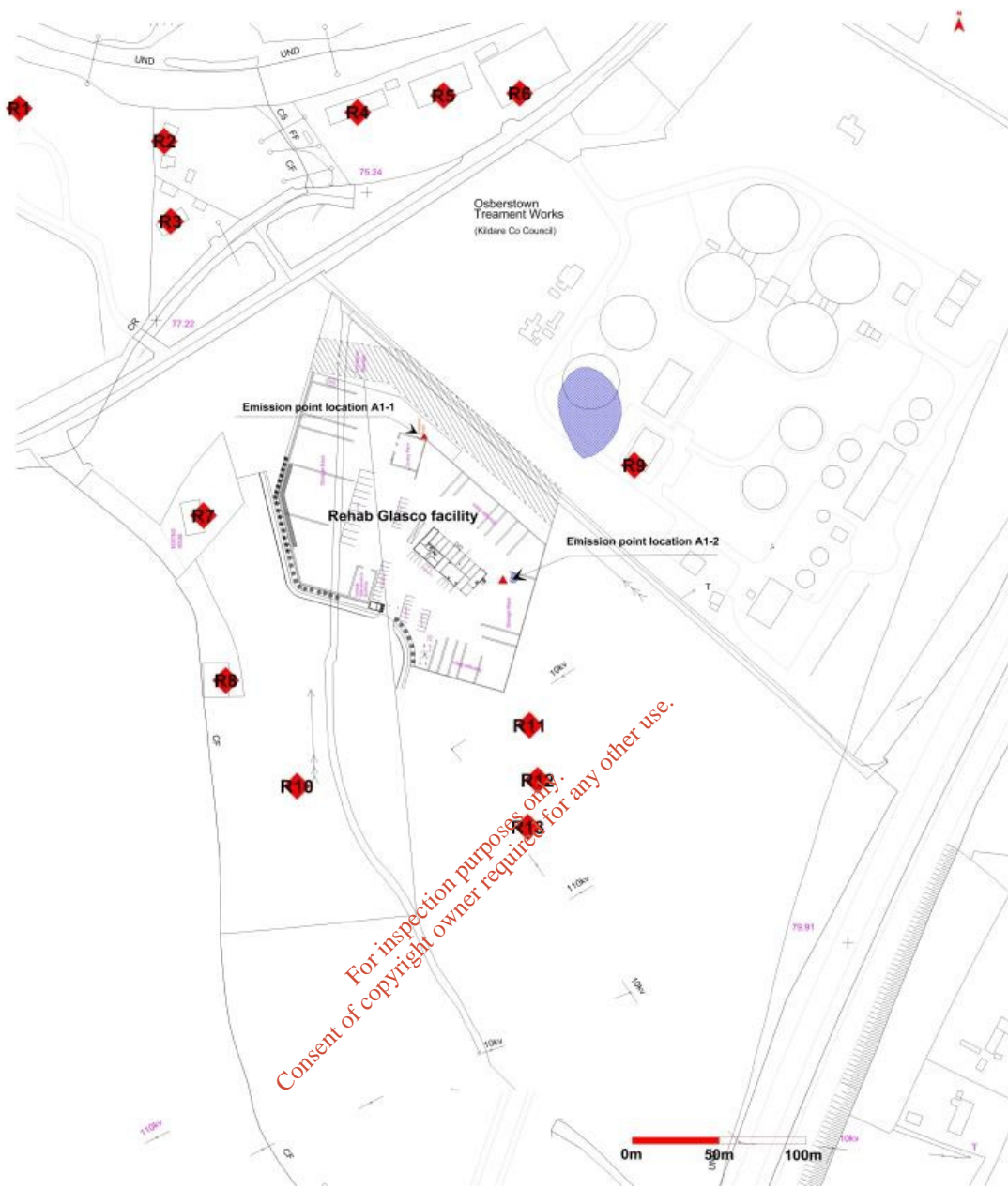


Figure 6.10. Predicted Total particulates as $\text{PM}_{2.5}$ ground level concentration impact contribution of cumulative emissions from all named emission points for the Annual average ground level concentration of $\leq 4.0 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

6.5 Total Organic Carbon contour.

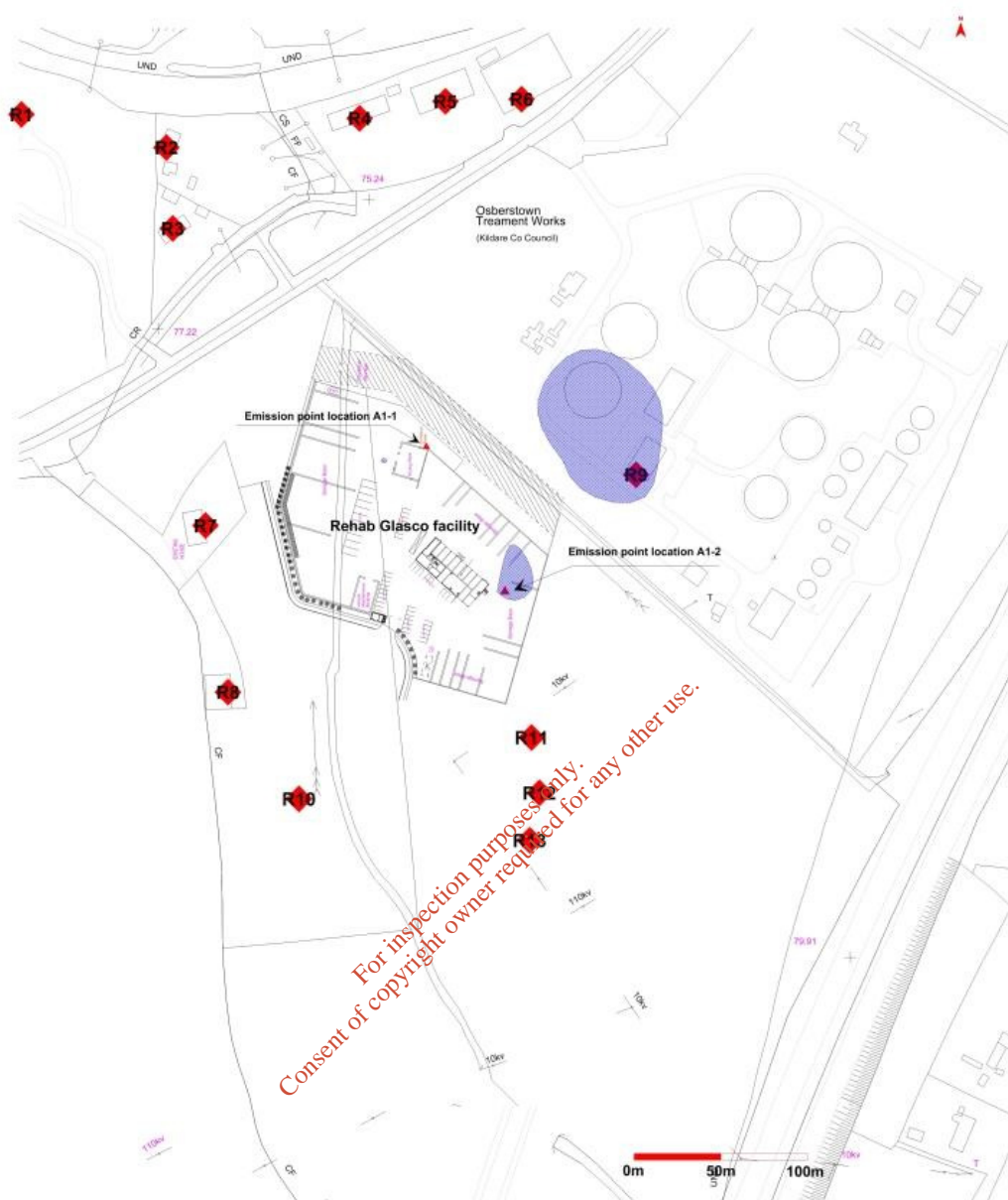


Figure 6.11. Predicted Total Organic Carbon ground level concentration impact contribution of cumulative emissions from all named emission points for the Annual average ground level concentration of $\leq 6.0 \mu\text{g}/\text{m}^3$ (—) for worst case meteorological year Casement 2004.

7. Appendix II - Meteorological data used within the Dispersion modelling study.

Meteorological file Casement 2004 to 2008 inclusive

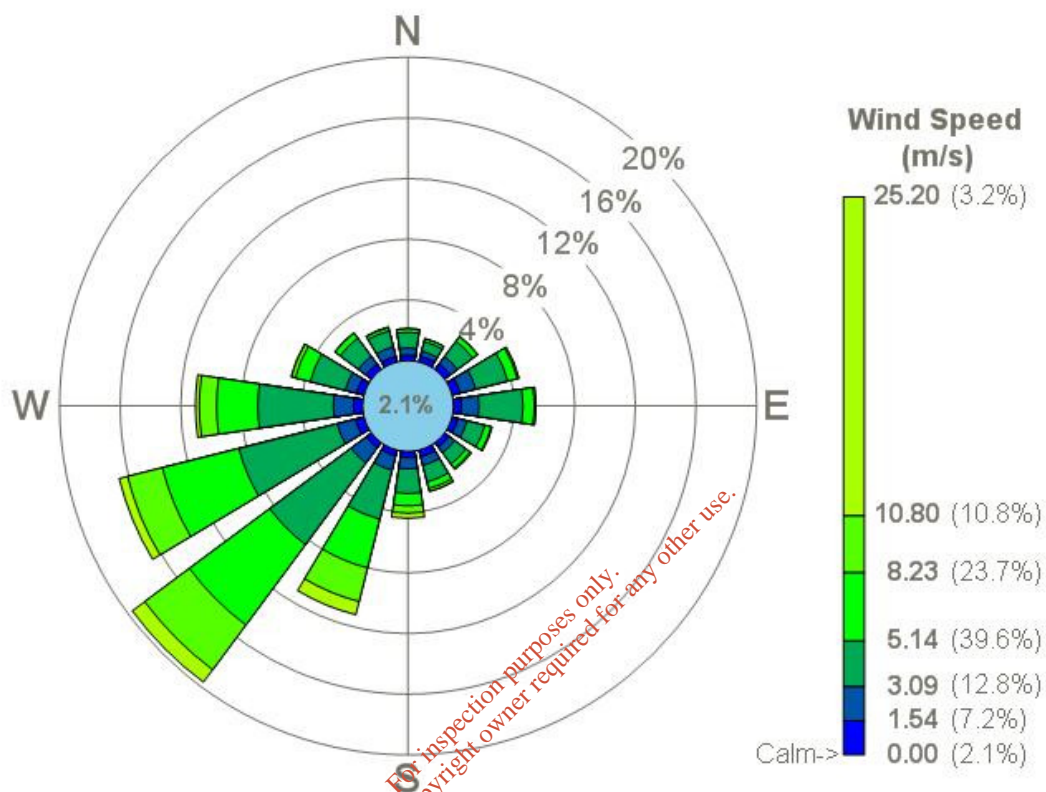


Figure 7.1. Schematic illustrating windrose for meteorological data used for atmospheric dispersion modelling – Casement 2004 to 2008 inclusive.

Table 7.1. Cumulative wind speed and direction for meteorological data used for atmospheric dispersion modelling Casement 2004 to 2008 inclusive.

| Cumulative Wind Speed Categories | | | | | | | |
|-----------------------------------------|------------------|-----------------|-----------------|-----------------|-------------------|-------------------|---------------|
| Relative Direction | > 1.54 | >3.09 | >5.14 | >8.23 | > 10.80 | < 10.80 | Total |
| 0 | 0.37 | 0.47 | 1.03 | 0.23 | 0.00 | 0.00 | 2.10 |
| 22.5 | 0.39 | 0.35 | 0.64 | 0.20 | 0.01 | 0.00 | 1.58 |
| 45 | 0.47 | 0.58 | 1.27 | 0.37 | 0.03 | 0.00 | 2.72 |
| 67.5 | 0.54 | 1.06 | 2.18 | 0.66 | 0.10 | 0.00 | 4.54 |
| 90 | 0.52 | 1.15 | 2.91 | 0.74 | 0.10 | 0.01 | 5.44 |
| 112.5 | 0.40 | 0.61 | 1.21 | 0.43 | 0.05 | 0.01 | 2.72 |
| 135 | 0.37 | 0.46 | 0.93 | 0.33 | 0.10 | 0.02 | 2.20 |
| 157.5 | 0.46 | 0.58 | 1.12 | 0.45 | 0.18 | 0.03 | 2.82 |
| 180 | 0.41 | 0.74 | 1.62 | 0.81 | 0.48 | 0.34 | 4.40 |
| 202.5 | 0.38 | 0.98 | 3.33 | 3.31 | 2.29 | 0.90 | 11.19 |
| 225 | 0.43 | 1.24 | 6.69 | 6.60 | 3.68 | 1.02 | 19.66 |
| 247.5 | 0.58 | 1.24 | 6.68 | 5.22 | 2.37 | 0.57 | 16.66 |
| 270 | 0.60 | 1.33 | 4.98 | 2.73 | 1.14 | 0.26 | 11.04 |
| 292.5 | 0.51 | 0.76 | 2.38 | 1.01 | 0.26 | 0.04 | 4.96 |
| 315 | 0.45 | 0.63 | 1.50 | 0.40 | 0.03 | 0.00 | 3.01 |
| 337.5 | 0.38 | 0.64 | 1.09 | 0.21 | 0.03 | 0.00 | 2.37 |
| Total | 7.24 | 12.83 | 39.58 | 23.70 | 10.85 | 3.20 | 97.40 |
| Calms | -- | - | - | - | - | - | 2.12 |
| Missing | - | - | - | - | - | - | 0.48 |
| Total | - | - | - | - | - | - | 100.00 |

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8. **Appendix III - Checklist for EPA requirements for air dispersion modelling reporting**

Table 8.1. EPA checklist as taken from their air dispersion modelling requirements report.

| Item | Yes/No | Reason for omission/Notes |
|--------------------------------------------------------------------------|-----------|------------------------------------------------------------------------------------------------------------------------------------------|
| Location map | Section 6 | - |
| Site plan | Section 6 | - |
| List of pollutants modelled and relevant air quality guidelines | Yes | - |
| Details of modelled scenarios | Yes | - |
| Model description and justification | Yes | - |
| Special model treatments used | Yes | - |
| Table of emission parameters used | Yes | - |
| Details of modelled domain and receptors | Yes | - |
| Details of meteorological data used (including origin) and justification | Yes | - |
| Details of terrain treatment | Yes | - |
| Details of building treatment | Yes | - |
| Details of modelled wet/dry deposition | N/A | - |
| Sensitivity analysis | N/A | Five years of hourly sequential data used from nearest valid met station-Casement 2004 to 2008 inclusive. Worst case year was year 2004. |
| Assessment of impacts | Yes | Pollutant emissions assessment from process identified. |
| Model input files | No | DVD can be sent upon request. Files are a total of 4.60 GB in size. |