

This report has been cleared for submission to the Board by Director Dara Lynott  
Signed *Nolice Keel* Date *24/12/15*



OFFICE OF CLIMATE, LICENSING &  
RESOURCE USE

ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM

<b>TO:</b>	DIRECTOR
<b>C.C:</b>	Frank Clinton, Programme Manager
<b>FROM:</b>	Brian Meaney, Senior Inspector
<b>DATE:</b>	23 December 2015
<b>RE:</b>	Request for a Technical Amendment to IE Licence Register Number <b>W0184-01</b> held by <b>Enva Ireland Limited</b> for a facility at Clonminam Industrial Estate, Portlaoise.

The Agency received a request on 27 November 2015 to amend the Industrial Emissions licence register number W0184-01. The request relates to a proposed new treatment method to deal with odorous off-gases from processes at the installation.

This memo recommends refusal of the request.

### Introduction

Enva Ireland Ltd is authorised for the operation of a hazardous and non-hazardous waste treatment and transfer installation at Portlaoise. The facility was first authorised by IPC licence (P0472-01) in January 2000. The IPC licence was replaced by a waste licence in January 2004. The waste licence was technically amended in October 2005, February 2011 and January 2013. The waste licence was amended in December 2013 for the purposes of the Industrial Emissions Directive. The licence is now an Industrial Emissions licence.

Up to 110,000 tonnes per annum of non-hazardous and hazardous waste can be accepted at the installation. According to the Annual Environmental Report for 2014, some 22,800 tonnes of waste were accepted at the installation.

### Details of request for technical amendment under section 96 of the EPA Acts 1992, as amended

The licensee has requested amendment of condition 5.3 as follows:

- "5.3 Drying of waste oils will be carried out with an appropriate abatement system operating to ensure air emissions from these tanks do not give rise to nuisance at the facility or the immediate area of the facility."

[The existing condition 5.3 of the licence comprises eight sub-conditions. It is assumed for the purposes of this report that the licensee does not propose deleting the existing condition 5.3. Rather, it is taken that the proposed new wording is to be inserted as condition number 5.3:9].

### Technical proposal

The new condition is to be associated with the:

"installation of a thermal oxidiser to abate odour emissions from the existing oil drying tanks."

An outline of the proposed system was provided with the technical amendment request. The following is a summary.

Warm, water-laden vent gases from the oil heating tanks will be captured by new ductwork and delivered to a preheater to increase the gas temperature to 110°C to remove aerosols and oil and water droplets and prevent condensation and corrosion in the regenerative thermal oxidiser (RTO). The preheater will use steam from the existing steam-raising boiler.

The heated vent gases are directed to the RTO and passed through one of three regeneration towers. Further pre-heating takes place and some of the hydrocarbons are oxidised. The hot gases pass to the combustion chamber where they are heated to 850°C. The combustion exhaust gases are passed through the other regeneration towers to transfer heat for the next batch of vent gases. The exhaust gases are vented at 123-140°C.

The RTO will be started up and heated using air and natural gas. Natural gas will be used during the process to make up any shortfall in the available exothermic energy from the VOCs in the vent gases.

Safety measures are built into the RTO design to detect and prevent the combustion of vent gases with VOCs that exceed the lower explosion limit of 25%. Any such gases will be diluted with atmospheric air or, through a bypass line, vented directly to atmosphere.

The RTO system can handle a maximum vent gas flow rate of 24,600m<sup>3</sup>/h with a VOC loading of 160kg/h. Emission levels during stable operation will be:

Removal efficiency of organic odours	>95%
TOC	≤20mg/Nm <sup>3</sup>
CO	≤100mg/Nm <sup>3</sup>
NOx	≤200mg/Nm <sup>3</sup>

## Discussion

### *Proposed new condition*

It is not clear how the proposed new condition (quoted above) will serve the installation, operation or regulation of the RTO system. The existing conditions of the licence will provide the same net effect as that proposed in the new condition. These conditions are as follows:

- 6.2 The licensee shall ensure that the activities shall be carried out in a manner such that emissions do not result in significant impairment of, or significant interference with the environment beyond the facility boundary.
- 7.2 The licensee shall ensure that dust, noise and odours do not give rise to nuisance at the facility or the immediate area of the facility. Any method used by the licensee to control any such nuisance shall not cause environmental pollution or contravene any national statutory protection granted in respect of protected species or cause significant interference with amenities or the environment beyond the site boundary.

I am of the opinion that, with the regulatory controls expressed by conditions 6.2 and 7.2 of the licence, there is no need for the proposed new licence condition of itself.

### *Regulation of RTO and its emissions*

The vent gases from the oil heating tanks have been attributed as the source of odorous emissions from the installation and the cause of complaints from residents in the vicinity. The purpose of the RTO is to treat the waste gases and prevent odorous emissions. The regulation of a thermal oxidiser through a licence is normally through the identification, in the licence, of an emission point and the regulation of emissions at that point by emission limit values. It is necessary to demonstrate that these limit values are low enough that they will not cause an exceedence of air quality standards or odour nuisance.

The licensee has provided information on the nature and characteristics of the RTO exhaust gases. However there is no information on the environmental impact of the emissions at these emission values. The emissions will have to be modelled to predict the ground level concentration of relevant substances in the vicinity of the installation and ensure that air quality standards are not exceeded. An odour dispersion model may also be required because odour is the source of the complaints.

The Agency will have to carry out a screening for appropriate assessment. If screened in, a full appropriate assessment will be required.

The Agency will have to carry out a screening for environmental impact assessment (EIA). If screened in, EIA will be required. Consultation will have to take place with the planning authority as part of the EIA process. There will also be a need to determine whether planning permission is required for the installation of an RTO and whether the planning authority did or would require an EIS to be submitted with a planning application.

In the normal course of events, a request of this nature would not be accommodated by technical amendment.

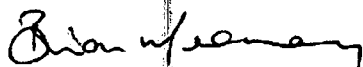
Also, the technical amendment process affords no opportunity for public participation or the acceptance of submissions from third parties. Given the fact that a new emission point is proposed, it is appropriate that public participation is part of the process.

### **Recommendation**

I recommend that the requested technical amendment, being the proposed insertion of a new condition into licence register number W0184-01, should be refused because the proposed licence condition provides no new regulatory controls that don't already exist in the licence.

With regard to the proposal to install an RTO and a new emission point, I recommend that the Agency inform the licensee that the necessary environmental assessments and licence amendments cannot be carried out as a technical amendment to the licence.

Signed:



Brian Meaney

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the smooth operation of any business and for the protection of its interests. The text also mentions the need for regular audits and the importance of having a clear system of internal controls.

In the second part, the author talks about the role of management in ensuring the success of the organization. It highlights the need for effective communication, both internally and with external stakeholders. The text also discusses the importance of setting clear goals and objectives and the need for a strong leadership team.

The third part of the document focuses on the financial aspects of the business. It discusses the importance of budgeting and financial planning, and the need to monitor the company's financial performance closely. The text also mentions the importance of having a good understanding of the company's financial position and the need to have a clear plan for the future.

In the fourth part, the author discusses the importance of human resources. It emphasizes the need to attract and retain top talent and the importance of providing a good working environment. The text also mentions the need for ongoing training and development and the importance of having a clear career path for employees.

The fifth part of the document discusses the importance of marketing and sales. It emphasizes the need to have a clear understanding of the market and the need to have a strong sales and marketing strategy. The text also mentions the importance of having a good relationship with customers and the need to have a clear plan for the future.

In the sixth part, the author discusses the importance of legal and regulatory compliance. It emphasizes the need to have a good understanding of the laws and regulations that apply to the business and the need to have a clear plan for the future. The text also mentions the importance of having a good relationship with the legal and regulatory authorities.

The final part of the document discusses the importance of risk management. It emphasizes the need to have a clear understanding of the risks that the business faces and the need to have a clear plan for the future. The text also mentions the importance of having a good relationship with the insurance and risk management industry.