This Report has been cleared for submission to the Director by Senior Inspector Sean O'Donoghue,

Signed: Seán Keaney ***Date: 12/04/2016***

OFFICE OF ENVIRONMENTAL SUSTAINABILITY

INSPECTOR'S REPORT

To:	Director	
From:	Gavin Clabby	**ENVIRONMENTAL LICENSING PROGRAMME**
Date:	12 APRIL 2016	
RE:	Review of an IE Licence for Quinn Building Products, Licence Register P0863-02	

APPLICATION DETAILS

Class of activity under First Schedule of EPA Act 1992 as amended:	2.1: Combustion of fuels in installations with a total rated thermal input of 50 MW or more
Category of Activity under IE Directive (2010/75/EU):	1.1
Title of BREF document (main):	Reference Document on Best Available Techniques for Large Combustion Plants
Section 87(1)b notice sent:	29 September 2011
Review application received:	14 November 2012
CRO number:	NI013573
GHG Permit:	Not yet applied for.
Notices under Regulation 13(2) issued:	12 November 2014
Information under Regulation 13(2) received:	none
Submissions received:	Three (17 December 2012, 13 January 2015, 06 June 2015)

1. Installation and Licensee

Quinn Energy (Ballykelly) Limited applied to the Agency in 2008 for a licence to operate a proposed 450 MW combined cycle gas turbine (CCGT) power plant, at a greenfield site in Toomes, County Louth. IPPC Licence Reg. No. P0863-01 was issued by the Agency on the 22 September 2009 permitting activity class 2.1[1] of the First Schedule of the EPA Act 1992 as amended (hereafter the EPA Acts).

As, at the time, the licensable activity had not yet commenced, Quinn Energy (Ballykelly) Limited applied to the Agency on 02 August 2012 for an extension of the licence's commencement date. Under section 92(2)(b) of the EPA Acts, the Agency subsequently granted an extension of three years.

The IPPC licence was technically amended (IE Amendment) on 06 January 2013 under Section 82A(11) of the EPA Act 1992 as amended to bring it into conformity with the Industrial Emissions Directive (IED) (2010/75/EC).

On 01 September 2015 Quinn Energy (Ballykelly) Limited again applied to the Agency for a further extension of three years; this was subsequently granted by the Agency.

Prior to the granting of the second extension, Quinn Energy (Ballykelly) Limited applied to the Agency for, and was subsequently granted, a transfer of the IE licence to Quinn Building Products Limited.

The licensee for P0863-01 is now Quinn Building Products Limited (hereafter the licensee). At the time of writing this report, the licensee had yet to commence the licensable activity. (The proposed installation remains a greenfield site.)

2. Reason for Licence Review

On 29 September 2011 (prior to the IE amendment in 2014), the Environmental Protection Agency initiated a review of the licence. The reasons for initiating the review were in light of requirements under the following Regulations (collectively the EO regulations):

(1) *European Communities Environmental Objectives (Surface Waters) Regulations 2009,* SI 272/2009 (hereafter the EO Surface Water Regulations).
(2) *European Communities Environmental Objectives (Ground Water) Regulations 2010,* SI 9/2010 (hereafter the EO Groundwater Regulations).

Also, as part of this EO review, the opportunity is being taken to update the licence with respect to IED requirements.

[1] The combustion of fuels in installations with a total rated thermal input of 50MW or more.

It should be noted here that this review was completed in the absence of further information that was requested by the Agency on the 12 November 2014[2]. The information requested was not related to the original EO review but was additional information relating to requirements under the IED. Due to ongoing uncertainty and delay in the project (works have not yet commenced) the licensee stated it was not in a position to provide meaningful information. I subsequently decided to proceed with the consideration of the review, and to revise the licence with respect to the requirements of both the EO regulations and the IED.

Process Description

The proposed CCGT will be fuelled on piped natural gas. However, it is also proposed to use diesel oil (gas oil) as a back-up fuel. Diesel oil storage, of approximately 10,000m^3, will be provided on-site.

The proposed CCGT plant involves the following processes:

- A gas turbine burning natural gas, or diesel as a temporary back-up fuel, which drives a generator for electricity production;
- Exhaust gases from the turbine pass through a Heat Recovery Steam Generator (HRSG) to generate high pressure steam;
- The steam generated in the HRSG drives a steam turbine, which turns the generator providing additional electrical power; and
- The steam is condensed back to water via an air cooled condenser for reuse in the HRSG.

It is worth noting here that, as the steam is condensed and recycled, the installation does not involve the discharge of cooling water to surface waters.

3. Emissions to Surface Waters

Process Emissions

The license pemits one emission point (SW1) to the River Glyde, approximately 5km from the proposed installation, and 300m upstream of Tallonstown (see appendix for site location map). Emissions to water include treated process waste water and treated sanitary effluent; the maximum emission will be 250m^3/day. In addition, surface water run-off from the proposed installation will also discharge to the River Glyde via the same emission point. This combined discharge will be conveyed to the River Glyde via a 6.7km pipeline (to be installed by the licensee following a route along the public road). The location of discharge to the River Glyde was chosen following consultation with the Eastern Regional Fisheries Board (now Inland Fisheries Ireland).

The effluent will contain concentrated dissolved solids from the demineralisation treatment of raw feed water. Up to 65m^3/day of effluent will be generated. In addition, 79m^3/day of boiler blow-down arises from the HRSG and up to 66m^3/day

[2] The provision for the Agency to proceed with the consideration of a review in the absence of requested further information is specified in Regulation 13(4) of the *Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013*.

will be generated from boiler and condensate drains. To maintain optimum boiler and steam conditions the demineralised water to be used in the HRSG is treated with Ammonium Hydroxide (for pH correction), Tri-sodium Phosphate (to prevent scaling) and Carbohydrazide (to remove oxygen).

Occasionally, the HRSG will be drained completely to accommodate maintenance; however, the effluent will be balanced prior to discharge and therefore, the final discharge to the receiving water will not exceed 250m^3/day. General plant washings will be directed via an oil interceptor to the process waste water discharge tank.

Process effluent will be directed to the process effluent discharge tank, which will have a capacity of 1,200m^3, divided into a number of chambers. The initial chamber allows balancing of the process effluent prior to the effluent passing into two aeration chambers where air will be circulated through the effluent to reduce the temperature and re-aerate the effluent. Following aeration the effluent passes into a chamber where pH is measured and dosed as necessary to adjust the pH to between 6-9. The effluent will then be pumped into the discharge chamber where the effluent will be monitored for dissolved oxygen, pH, conductivity, ammonia, total organic carbon (TOC) and temperature using on-line analysers. The RD specifies emission limit values for the process effluent prior to mixing with sanitary effluent or surface water. Process effluent which exceeds the emission limit values specified in the RD may not be discharged to the River Glyde; such effluent will be further treated on-site or taken off site to an authorised facility.

The licence also requires that sanitary effluent arising on-site is treated by an on-site proprietary secondary treatment system (design p.e. 50). Following treatment the effluent will be pumped to mix with process effluent prior to discharge via the effluent pipeline to the River Glyde. In line with the existing licence, the RD specifies separate effluent monitoring and emission limit values for the treated sanitary effluent prior to mixing with the process effluent.

Receiving waters and impact

The following table summarises the main considerations in relation to the impact of the installation's discharge (SW1) to the receiving waters (the River Glyde).

Table 1: Summary of main considerations

Characteristic	Information	Comment
Receiving water details and status	River Glyde (IE_NB_06_1097) Overall status and physico-chemical status: 'moderate' (for 2010-2012 cycle) Overall risk score : 1a 'at risk' (score applied 2008) Restore date: 2021	Key parameters: BOD, MRP, and ammonia, (also non-ionised ammonia, suspended solids and nitrites) 'At risk' rating determined by EPA diffuse model (WFD, 2008); WFD report determines the river is not at risk from IPPC point sources.
WFD monitoring stations	Upstream: Br W of Mullacrew - RS06G020600 2.8 km upstream of SW1 Downstream: Tallanstown Bridge Br - RS06G020700 300 m downstream of SW1	Q3-4 (2012, mean of four samples) No upstream chemical monitoring available Q3-4 (2012, mean of four samples) Downstream BOD and MRP: high status Ammonia: good status
Protected Areas (see Section 2.2)	No SPAs/SACs in the vicinity downstream of the discharge. No SPAs/SACs in the vicinity of the installation.	One SPA (Bog) bordering the river Glyde 8.8 km downstream. One coastal SPA/SAC 13 km from installation. Noted as productive salmonid system (IFI)

From the table above, it can be seen that monitoring for the purposes of the 2010 to 2012 WFD cycle, indicates that the physico-chemical status, and the overall ecological status, of the River Glyde is 'moderate'. The overall objective for the waterbody is the achievement of 'Good' status by 2021.

The most recent biotic index, or Q-value (assigned in 2012) is 3-4 (slightly polluted/moderate) at the nearest stations both upstream and downstream of the proposed discharge point. However, analysis of physico-chemical monitoring data provided by the Agency/local authority (Aquarius) indicates this stretch of the river is at good chemical status. Aquarius data is only available for the WFD monitoring

station downstream of the discharge point (SW1); however, as SW1 is only a proposed emission (with no discharges presently occurring) this 'downstream' point may be taken as an indication of background levels.

The 95%ile flow in the river, in the vicinity of the discharge, is 0.26 m^3/s (the dry weather flow is 0.16 m^3/s). The increase in concentration of water quality parameters is small due to the relatively significant dilution provided in the receiving water at 95%ile and even at dry weather flow rates (c.89 and 55 dilutions respectively). The mass balance calculations below are based on the 95%ile flow in the receiving water, the mean background concentration of each parameter in the receiving water (taken from 2015 Aquarius data), the proposed maximum effluent discharge rate and the maximum concentration of each parameter in the effluent permitted in the RD (see table 2 below).

Table 2: Mass balance for proposed emission limit values (SW1)

Parameter	**Measured mean Background Concentration (mg/l)**	**Current ELVs (mg/l)**	**Proposed ELVs (mg/l)**	**Contribution from the discharge** Note1 **(mg/l)**	**Predicted downstream concentration** Note 1 **(mg/l)**	**95%ile EQS good status (mg/l)**
EO Review						
BOD	1.3	20	**20**	0.22	1.52	2.6 Note 3
MRP	0.03	0.1 (TP)	**0.1 (as TP)**	0.001	0.031	0.075 Note 3
ammonia - N	0.04	1.00	**1**	0.011	0.051	0.14 Note 3
Protection of Salmonid Waters						
Non-ionised ammonia- (NH_3)	0.01 Note 2	0.04	**0.04**	0.0004	0.0104	0.02 Note 4
Suspended Solids	12.5 Note 2	30	**30.0**	0.33	12.83	≤25 Note 4
Nitrites (NO_2)	0.01	1 (as N) Note 5	**1 (as N)** Note 5	0.003	0.013	0.05 Note 4
Total Residual Chlorine	0.0025 Note 2	0.20	**0.1**	0.0022	0.0036	0.005 Note 4

Note 1: Based on proposed ELVs.

Note 2: Assumed value; Half the value of the standard required by the Water Framework Directive for the protection of Salmonid Waters. (as no monitoring data available for these parameters).

Note 3: European Communities Environmental Objectives (Surface Waters) Regulations 2009 as amended.

Note 4: Standard required by the Water Framework Directive for the protection of Salmonid Waters.

Note 5: Nitrite expressed as N in current and proposed licence, but expressed as NO_2 for the purpose of assessment against Salmonid Waters standard.

Surface water run-off

As detailed above, it is proposed that surface water run-off from the installation would combine with the process and sanitary effluent streams before being piped to the River Glyde.

The licensee stated in the review form that there may be an opportunity to discharge some surface water run-off to a constructed wetland area of ecological mitigation located to the east of the site. The licensee proposed to include a provision for a separate channel to lead from the attenuation tank to the wetland area, subject to agreement with the National Parks and Wildlife Service (NPWS) and the EPA.

There was insufficient information included in the review form for the Agency to assess such a proposed discharge, and, therefore, is not considered any further. The licensee should liaise with the Agency (and NPWS) should the likelihood of such a discharge arise in the future.

Specific Pollutants and Priority substances

The discharges from the proposed installation, as detailed in the licensee's review application form, do not contain any of the Specific Pollutants, Priority Substances or Priority Hazardous Substance, as listed in Schedule 6 of the EO Surface Waters Regulations.

Recommended Determination

The EO Surface Water Regulations set environmental quality objectives for the receiving water for orthophosphate (0.075mg/l), ammonia (0.14mg/l) and BOD (2.6mg/l). Using mass balance calculations, the limits specified in the current licence were assessed. As can be seen from table 2 above, these ELVs aim to achieve compliance with the relevant environmental quality standards.

Although the River Glyde is not designated as Salmonid Waters, it has been highlighted by Inland Fisheries Ireland as a very productive salmonid system. For this reason certain other ELVs from the current licence have been re-assessed to afford the protection required for Salmonid Waters designated on the Water Framework Directive's (WFD) Register of Protected Areas. As can be seen from table 2 above, the relevant ELVs in the current licence, with the exception of Total Residual Chlorine, were considered adequate and carried forward to the RD. The ELV specified in the RD for Total Residual Chlorine is 0.1 mg/l.

The temperature ELV specified in the RD remains at 21 °C. However, in line with protection requirements for Salmonid Waters, Condition 5.5 of the RD specifies the additional requirement that the emission to water does not result in the ambient temperature in the river rising by more than 1.5 °C or result in the river temperature exceeding 10 °C during the period of the 1st November to 30th April.

All remaining parameters specified in the current licence limits for SW1 (pH, toxicity, total dissolved solids, and mineral oil have been carried forward in the RD.

In addition, and in accordance with the national BAT note, the RD specifies a COD limit of 250 mg/l and an Oil, Fats and Grease limit of 10 mg/l.

All limits specified for SW1 in the RD are considered compliant with the requirements of the EO Surface Waters Regulations, including the WFD's requirements for

Protected Areas (as well as the requirements of the Industrial Emissions Directive and BAT for the sector; see section 7 below).

In line with the current licence, the RD includes separate emission limit values for the process effluent (SW- 1) and treated sanitary effluent (SW-2). The emission limit values apply prior to mixing of the effluents and prior to any dilution of the effluent with surface water. Also, as per the current licence, the RD requires the licensee to monitor the process effluent (SW- 1), treated sanitary effluent (SW-2) and combined effluent discharge (process and treated sanitary effluents, SW-3).

Carbohydrazide, which, as previously mentioned, is used to treat the demineralised water in the HRSG, has the following associated risk phrases: R52/53 (harmful to aquatic organisms, may cause long-term adverse effects in the aquatic environment). Given that the River Glyde is considered an important fishery, the RD specifies annual monitoring for carbohydrazide in the process effluent and in the receiving water. The RD also requires the licensee, where possible, to substitute carbohydrazide with a less harmful product within 18 months of the commencement of the licensable activity.

Other direct and indirect emissions to water

Discharges to sewer

There are no proposed emissions to sewer from the installation.

Emissions to Ground/Groundwater

There are no proposed emissions to ground or groundwater at the installation. The proposed installation is to be sited on a green field site which has to date been used as agricultural lands, some of the site area is overgrown and has provided rough grazing.

The licensee has identified that there are eleven ground water wells within approximately 2 kilometres of the proposed installation. There are no discharges to groundwater or abstraction of groundwater associated with the proposed activity, therefore, there are no likely impacts on the groundwater resources.

The risk of contamination of soil/groundwater due to the activity is deemed to be low, on the basis of the following provisions:

- Impermeable concrete surfaces in all areas associated with the handling and storage of potentially contaminating materials.
- Appropriate bunding for all fuel and chemical storage areas, with routine integrity testing, as required by the licence.
- Licensee proposes to install tertiary containment by means of an apron around the bund wall to collect any diesel overtopping the secondary bund wall, in the event of a catastrophic failure of a diesel tank.
- Rain water collecting within the bunds, following testing, must be pumped to the surface water drainage system oil interceptor, silt trap and attenuation pond prior to discharge (to the River Glyde).

Recommended Determination

The RD has transposed all relevant existing licence conditions from P0863-01 into the Agency's current licence format. Consequently the RD specifies amendments and additional requirements.

4. Measures to be taken with regard to cessation

Article 22(2) of the IED requires that where the activity involves the use, production or release of relevant hazardous substances and having regard to the possibility of soil and groundwater contamination at the site of the installation, the operator shall prepare and submit to the competent authority a baseline report before starting operation of an installation.

Recommended Determination

Condition 11.12 of the RD requires the licensee, prior to commencement of the licensable activity, to provide a baseline report in accordance with Section 86B of the EPA Act 1992 as amended and the *European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions (2014/C/136/03).*

The RD requires the licensee, also in advance of the commencement of the activity, to submit a Decommissioning Management Plan (DMP) and an Environmental Liabilities Risk assessment (ELRA).

In conclusion the site is currently uncontaminated and the risk of contamination from the activities at the installation is low due to the nature of the operation and the proposed measures as described above.

The RD requires soil monitoring for relevant hazardous substances to be carried out every 10 years, and groundwater monitoring to be carried out every 5 years, in accordance with the requirements of the IED.

5. Appropriate Assessment

The installation is in a rural location three kilometres west of Louth village. The installation discharges combined process water directly to the River Glyde,. just upstream of Tallanstown. The main emissions to air arise from the gas turbine main stack.

There are three Natura 2000 sites located in the vicinity (within 15 km) of the activity: Stabannan-Bragganstown SPA (Site code: 004091), Dundalk Bay SPA and SAC (Site codes: 004026 and 000455), However, it is considered that only the European site at Stabannan-Bragganstown is considered within the zone of influence of the installation's emissions (see appendix). This zone of influence was determined, with respect to effluent emissions, on the basis of the considerable downstream distance from the installation's discharge point in the River Glyde to Dundalk Bay (22km). With regard to air emissions, as determined in section 7 below, there will be minimal impact beyond the boundary of the installation.

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the proposed activity, individually or in combination with other plans or projects is likely to have a significant effect on any European Site. In this context, particular attention was paid to the European site at Stabannan-Bragganstown.

The Agency considered, for the reasons set out below, that the proposed activity is not directly connected with or necessary to the management of any European site and that it can be excluded, on the basis of objective information, that the proposed activity, individually or in combination with other plans or projects, will have a

significant effect on any European site and accordingly determined that an Appropriate Assessment of the proposed activity was not required.

This determination was made in light of the fact that the assessment for the current licence did not consider that the activity would have a significant effect on any European site, and that this review is for the purposes of the EO Regulations (and to a lesser extent the IED), whereby additional and more stringent ELVs are proposed for the revised licence. No changes to the installation's infrastructure, emissions or operation were considered under this review.

6. Updating the existing licence

6.1 ELVs from the IED and consideration of BAT-AELs

Although this review is for the requirements of receiving water legislation (i.e. the EO regulations), the opportunity has been taken to update the current licence with regards to general legislative requirements for Industrial Emissions licensing. Consideration, therefore, has been given to the IED (Chapter III and Annex V) and BAT (the sectoral BREF note and the national BAT guidance note for the sector).

Discharges to water

Further to the limits above, which were assessed and set in accordance with EO Surface Water Regulations, additional relevant limits for discharges to waters were considered in accordance with the national BAT Guidance Note for the Energy Sector; consequently, the RD specifies a Chemical Oxygen Demand limit of 250 mg/l and an Oil, Fats and Grease limit of 10 mg/l. No additional ELV requirements for discharges to waters were specified in the IED or the sectoral BREF.

Discharges to Air

With regard to the IED and BAT, it is considered that the revised licence should specify certain new ELVs for the installation's discharges to air (A2-1, Gas Turbine Main Stack). Table 3 below sets out the current licence's ELVs along with relevant ELVs from the IED, as well as BAT-AELs from the national BAT note and the sectoral BREF.

Table 3: Comparison of current licence against IED and BAT

Parameter	Current licence		Annex V IED		BAT-AEL	
	Natural gas	Diesel	Natural gas	Diesel	Natural gas	Diesel
NOx	50	120	50	90	50[1]	120
SO_2	35	50	-	-	10[1]	120
Dust	5	30	-	-	5[1]	-
CO	-	-	100	100	100[1]	100[1]

Note 1: BAT-AEL specified in sectoral BREF and national BAT note; otherwise in national BAT note only.

On the basis of the above comparison, the RD specifies a reduction of the SO_2 ELV (gas fired) from 35 mg/m^3 to 10 mg/m^3 (based on sectoral BREF) and a reduction of the NO_x ELV (diesel fired) from 120 mg/m^3 to 90 mg/m^3 (based on IED). The RD also

specifies a new Carbon Monoxide ELV (for both gas and diesel fired operation) of 100 mg/m^3 (based on IED/sectoral BREF).

6.2 General Consideration of Best Available Techniques (BAT) and BAT conclusions

BAT for the installation was assessed against the BAT conclusions in the following documents:

- BREF document on Best Available Techniques for Large Combustion Plants, July 2006 (sectoral BREF for installation)
- BREF document on Best Available Techniques for Energy Efficiency, February 2009
- BREF document on Best Available Techniques on Emissions from Storage, July 2006

BAT was also assessed against the *BAT Guidance Note on the Best Available Techniques for the Energy Sector (Large Combustion Plant Sector), EPA 2008.*

It is considered that the installation will comply with the BAT conclusion requirements specified in the sectoral BREF document and will comply with all of the applicable BAT conclusion requirements contained in the additional BREF documents.

I consider that the applicable BAT Conclusion requirements are addressed through the technologies and techniques as described in the application as well as the standard conditions specified in the RD.

6.3 General updates

Table 5 below summarises the main amendments made to the existing licence as a result of changes to the following;

- Statutory and format updates of licence conditions
- Agency guidance updates
- The European Communities Environmental Objectives (Surface Waters) Regulations 2009 as amended
- The European Communities Environmental Objectives (Groundwater) Regulations 2010 as amended

Table 5: List of significant new or amended conditions proposed in the RD

Condition or Schedule No.	Reason for change	Description
2.2	Consideration of BAT	See section 8 above.
3.2	Consideration of BAT	See section 8 above.
3.21	IED requirement	Determination of start-up/shutdown periods.
6.19 (and Schedules C.2.2 and C.6)	Fisheries protection	Control and Monitoring requirements for carbohydrazide.
6.20	EO (Groundwater) Regulations	Relevant hazardous substances in soil and groundwater monitoring.
11.12	IED requirement	Submission of baseline report
Schedule B.4 *Noise Emissions*	Current NG4 guidance / licence template	Reduction in day-time and night-time ELVs, and new evening-time ELV.
Schedule C.1.2	IED (Annex V Part 3) requirement	Continuous monitoring for SO_x and Dust.

7. Submissions

Three submissions were received by the Agency in relation to the licence application. The submission points are summarised below followed by the Inspector's response, however the original submission should be referred to for full details.

Mariesa Rushe, Environmental Health Officer, Health Services Executive

Ms Rushe states that the documents relating to this licence application have been reviewed by the HSE, and that it has no comment to make at this time.

No further comment from this Inspector on the above submission.

Brian Beckett, Director, Inland Fisheries Ireland, Dublin

The IFI highlights its concern for the potential impact of the process effluent from the installation on the receiving water's ecological status and viability as a valuable fishery habitat; and that, consequently, both biological and chemical monitoring should be specified in the revised licence, as it is in the existing licence.

The IFI also note that there is no provision to monitor for any effects of sourcing the process water from Monalty Lough.

This review was initiated by the Agency and is principally for the purposes of the EO regulations whereby the Agency is required to ensure the limits for discharges to waters specified in existing licences aim to achieve the objectives of the WFD. In doing so, the Agency has demonstrated (in Section 3 above) that the proposed limits will not result in the breach of the relevant standards for the River Glyde; these standards include those required for the protection of salmonid waters, as well the general standards required under the Surface Waters Regulations. The RD also specifies a comprehensive monitoring regime, for the process effluent (including toxicity testing), the sanitary effluent, and for the receiving water (which includes and annual small stream risk score (SSRS) assessment).

The Agency, in conjunction with the local authorities, is, under the WFD, responsible for monitoring the status of all waterbodies. In relation to this licence, Condition 6.19 requires the licensee to monitor and record the volume of raw water used at the plant.

Peter Sweetman, Peter Sweetman and Associates, Rossport South, Ballina, County Mayo

Mr Sweetman states that no Environmental Impact Assessment (EIA) has ever been done for this Project.

An Environmental Impact Statement was submitted as part of the application for the existing licence (P0863-01). This application was examined and assessed as part of that licence application process. This review was initiated by the Agency, under Section 90 of the EPA Act 1992 as amended, and is precluded from the regulatory requirements of EIA.

8. Cross Office Liaison

I consulted OEE Inspector OEE Inspectors Niamh O'Donoghue and Caoimhin Nolan in relation to individual licence conditions and enforcement charges.

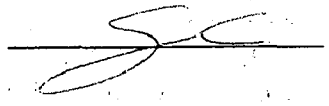
9. Charges

The annual enforcement change recommended in the RD is €6,985.68, which reflects the anticipated enforcement effort required and the cost of monitoring. This charge is based on the OEE's risk category for the installation, which has been carried over from the current licence (P0863-01). Given that the project for the licensable activity has yet to commence, it is at the discretion of the Agency to waive (or part waive) the charges for any given year prior to commencement of the activity.

10. Recommendation

I recommend that a Proposed Determination be issued subject to the conditions and for the reasons as drafted in the RD.

Signed



Gavin Clabby,

Inspector, OES

Procedural Note

In the event that no objections are received to the Proposed Determination of the application, a licence will be granted in accordance with Section 87(4) of the Environmental Protection Agency Acts 1992 as amended as soon as may be after the expiration of the appropriate period.

Appendix

European Site (site code)	**Distance/ Direction from installation**	**Qualifying interests** (* denotes a priority habitat)	**Conservation objectives**
Stabannan-Bragganstown SPA (Site code: 004091),	6.6 km SE of installation (9 km downstream of discharge)	**Species:** Greylag Goose *(Anser anser)*	As per NPWS (2015) Conservation objectives for Stabannan-Bragganstown [004091]. Generic Version 4.0 Department of Arts, Heritage and the Gaeltacht (dated 13/02/2015).
Dundalk Bay SPA and SAC (Site code: 004026 and 000455),	11 km east of installation (22 km downstream of discharge)	**Habitats:** Estuaries Mudflats and sandflats not covered by seawater at low tide Perennial vegetation of stony banks Salicornia and other annuals colonizing mud and sand Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) Mediterranean salt meadows (*Juncetalia maritimi*) **Species:** Great Crested Grebe (*Podiceps cristatus*) Greylag Goose (*Anser anser*) Light-bellied Brent Goose (*Branta bernicla hrota*) Shelduck (*Tadorna tadorna*) Teal (*Anas crecca*) Mallard (*Anas platyrhynchos*) Pintail (*Anas acuta*)	As per NPWS (2011) Conservation objectives for Dundalk Bay SPA and SAC [004026 and 000455]. Version 1 Department of Arts, Heritage and the Gaeltacht (dated 19/07/2011).

		Common Scoter (*Melanitta nigra*) Red-breasted Merganser (*Mergus serrator*) Oystercatcher (*Haematopus ostralegus*) Ringed Plover (*Charadrius hiaticula*) Golden Plover (*Pluvialis apricaria*) Grey Plover (*Pluvialis squatarola*) Lapwing (*Vanellus vanellus*) Knot (*Calidris canutus*) Dunlin (*Calidris alpina*) Black-tailed Godwit (*Limosa limosa*) Bar-tailed Godwit (*Limosa lapponica*) Curlew (*Numenius arquata*) Redshank (*Tringa totanus*) Black-headed Gull (*Chroicocephalus ridibundus*) Common Gull (*Larus canus*) Herring Gull (*Larus argentatus*) Wetland and Waterbirds	