Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

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Mr Gareth Kelly
Director
Enva Ireland Limited
Clonminam Industrial Estate
Portlaoise
County Laois

12 July 2016 Reg No: W0184-02

Dear Mr Kelly

I refer to the review of your licence which was initiated by the Agency on 26 January 2016.

I am to advise that in accordance with the provisions of Section 90 of the Environmental Protection Agency Act 1992 as amended, you are requested to supply the following additional information within 8 weeks of the date of this notice so that the Agency may complete a comprehensive assessment of the review:

Unit processes (Ref item 6 of our notice dated 26/1/2016 and your response dated 17/5/2016)

1. Explain the use of the term "Existing" in the header of table 6.2 of your response dated 17/5/2016 and explain the table entries under that heading, i.e. "yes" or blank.
2. Summarise your standard operating procedures regarding PCBs in the context of waste acceptance (including analysis and screening of incoming waste) and operations (unit processes) involving PCBs.
3. Table 6.2 of your response dated 17/5/2016:
    a. There are LoW codes in the waste oil recovery column of table 6.2 (as well as in table 8.1 of your response dated 17/5/2016) that are not listed in Schedule G.3 of your licence. This schedule limits the feedstocks for the production of your 19LS material. Clarify whether the 'non-Schedule G.3' LoW codes listed in table 6.2 will be used in the production of 11LS.
    b. It is stated that bituminous mixtures containing coal tar (17 03 01*) are treated by way of soil remediation so that contaminant levels are, as stated in table 6.1 of your response dated 17/5/2016, reduced to facilitate disposal to non-hazardous landfills, recovery at inert landfills or other suitable facilities. Please clarify and explain the process.
    c. Table 6.2 states that petrol (13 07 02*) may be put through the waste oil recovery unit process. Page 1 of your response to our question 7 states that petrol does not enter the oil recovery process. Please clarify.

Note:
Any ***telephone enquiries*** in relation to the above should be directed to Brian Meaney at the number above.
All ***written communications and replies*** should be directed to Noeleen Keavey at the address above.

Treatment of waste oil and contaminated soil (Ref item 7)

4. With regard to the proposed flash distillation process, provide detailed information on the process, its objectives, its design parameters and its process outputs and emissions (gas, liquid and solid).

5. Drawing no. Figure 2.3 indicates that the proposed flash distillation unit will be installed in the process room. Please indicate the scale and size of the machine by comparison to the space available in this room and outline the factors that make this a suitable location for the new machine. Clarify whether the waste oil filters and centrifuges are also located in this room.

6. With regard to the proposed flash distillation process, and by reference to your statement at the bottom of page 2 of item 7 that "this additional process would substitute for the current technique of chemical dewatering of oils":

    a. please provide a more precise description of what exactly the new process will replace;

    b. illustrate this by way of process flow (schematic) diagrams that compare past (up until 2016), current (2016) and proposed unit processes for the treatment of waste oil; and

    c. to the extent possible when dealing with a. and b. above, and where relevant, distinguish between the unit process lines for the production of 11LS and 19LS.

7. Identify and describe any dependencies that the flash distillation process will have on other unit processes, e.g. tank farm processes, filtration and centrifugation processes, carbon filters and regenerative thermal oxidiser, and what dependencies these other processes will have on the flash distillation process.

8. Specify the source of energy for the steam-powered heat exchanger that will form part of the flash distillation process. If there is a new boiler, provide:

    a. the information sought in the template table E.1(i), and

    b. evidence in the form of an air dispersion model completed in accordance with Agency Guidance AG4 that emissions to air from any new boiler, individually as well as cumulatively with other relevant emissions, will not cause exceedence of relevant air quality standards in the vicinity of the installation.

9. In relation to the dispatch of treated contaminated soil and BATC no. 11, describe the inert waste criteria that are used to differentiate between:

    a. a treated soil that is suitable for recovery as backfill at a soil recovery facility,

    b. a treated soil that is disposed of at an inert landfill.

10. With reference to tables 8.2 an 8.3 of your response dated 17/5/2016 and BATC no. 11, state how waste with LoW codes 13 05 01* and 13 05 03* is treated so that it is classified as inert waste for recovery or deposit in inert landfill.

Emissions (Ref items 9 and 10)

11. Page 4 of the non-technical summary refers to emission point A2-1 as a new emission point from a carbon filter treating tank head gases. Table E.1(ii) of your response dated 17/5/2016 refers to emission point A2-1 as an emission from a regenerative thermal oxidiser. Please clarify.

12. Complete table E.1(i) in full in relation to emission point A1-1 from the existing boiler.

13. Please provide a short report on monitoring of emissions at A1-1 that describes the monitoring carried out in accordance with condition 8.1 and Schedule D.8 of the existing licence. The report should cover the periods 2014, 2015 and 2016 to date.

14. Present the monitoring results for all parameters listed in Schedule D.8.1 and monitored annually. The following is a proposed format for the presentation of results, aggregated annually.

Year (2014-2016)	Parameter and unit	Limit value in licence or licensee's trigger level	Maximum value recorded during the period*	Average value during the period*	Number of exceedences of limit value during the period

* Specify the averaging period and also the parameters used to normalise the data ($\%O_2$, pressure, temperature).

15. Provide evidence in the form of an air dispersion model completed in accordance with Agency Guidance AG4 that emissions to air from A1-1 will not cause exceedence of relevant air quality standards in the vicinity of the installation. Link to the air dispersion model for any new boiler, as mentioned above and as appropriate.

16. Table E.1(iii) refers to emission point reference number A2-3. The source and nature of this emission is not clear. Please clarify.

17. Please provide a short report on monitoring of discharges at SW1 and SW2 that describes the monitoring carried out in accordance with condition 8.1 and Schedule D.4 of the existing licence. The report should cover the periods 2014, 2015 and 2016 to date.

18. Present the monitoring results for all parameters listed in Schedule D.4. The following is a proposed format for the presentation of results, aggregated monthly.

Month (2014-2016)	Parameter and unit	Limit value in licence or licensee's trigger level	Maximum value recorded during the period	Average value during the period*	Number of exceedences of limit value during the period

* Daily average from 24-hour composite sampling or continuous monitoring. If other averaging periods are used, provide this information.

19. State whether the sewer discharge point is to be known as FS1 or SE1 in any revised licence.

20. It is noted that table 10.1 of your response dated 17/5/2016 quotes emission limit values for FS1/SE1 that are different to those in the licence. Please clarify.

21. Please provide a short report on monitoring of discharges to sewer at emission point FS1/SE1 that describes the monitoring carried out in accordance with condition 8.1 and Schedule D.5 of the existing licence. The report should cover the periods 2014, 2015 and 2016 to date.

22. Present the monitoring results for all parameters listed in Schedule D.5. The following is a proposed format for the presentation of results, aggregated monthly.

Month (2014-2016)	Parameter and unit	Limit value in licence or licensee's trigger level	Maximum value recorded during the period	Minimum value recorded during the period (pH only)	Average value during the period*	Number of exceedences of limit value during the period
Jan 2014	COD (kg/d)	200				

* Daily average from 24-hour composite sampling or continuous monitoring. If other averaging periods are used, provide this information.

23. Please assign an emission point reference number to the proposed activated carbon filter to be installed at Building K (as described on page 2 of item 11 of your response dated 17/5/2016).

24. State the maximum flow rate to be discharged through emission point A3-52 and provide data on monitoring events that have taken place at this point. Provide justification for the emission being classified as a minor emission.

25. Clarify whether the "Hodgefield" oil water separator is the unit illustrated as "Grill Over Interceptor (SW1)" illustrated on drawing no. "Figure 2.2". State the maximum flow rate to be discharged through the new emission point A3-53 as well as the concentration of VOCs monitored in the discharge during each monitoring event. Provide justification for the emission being classified as a minor emission.

26. Provide justification for the proposed emission A3-54 from "the new large activated carbon filter" with a flow rate up to 10,000m^3/hour being classified as a minor emission.

27. With regard to the remaining "A3-" emissions listed in table E.1(iv) of your response dated 17/5/2016, it is apparent that many of these will be grouped and ducted through the ring main for treatment in a single process. Please group the A3- emission points according to the emission point they will ultimately discharge through. Identify which, if any, will remain as individual emission points. For any that will be individual emission points, state the maximum flow rate to be discharged and provide justification for each being classified individually as a minor emission.

General items regarding emission points to air (other than minor emissions)

28. Provide an updated drawing showing the location of all existing and proposed emissions points to air (other than minor) that you are seeking to be listed and authorised in a revised licence.

29. Taking into consideration the detailed information provided in your response dated 17/5/2016 and the information that will address the questions asked above, please check that you have done the following:

    a. each emission point to air sought for authorisation should be fully described and characterised in terms of source (include all "A3-" sources as appropriate), flowrate, treatment, nature and constituents.

    b. use the template tables E.1(i) and (ii), where not already completed, as a starting point for each emission point sought for authorisation and elaborate where necessary in order to ensure you are satisfying bullet point a.

    c. propose an emission limit value (where not already specified) for relevant parameters for each emission point.

d. provide evidence that the emissions to air, if compliant with the proposed limit values, individually or cumulatively, will not have an adverse environmental impact.

BAT Conclusions (Ref item 12)

30. Your response dated 17/5/2016 refers to BATC no. 9e from the Waste Treatments BREF as not applicable other than waste oil in drums. Please clarify.

31. BATC no. 10a: Elaborate on what laboratory analysis for hazardous waste is available at the installation and what is carried out elsewhere. Please state whether and what accreditation is in place at the on-site laboratory.

32. BATC nos. 10b and 10d: Clarify the location of the waste quarantine area and the waste inspection area.

33. BATC no. 10h: State when the technique will be in place.

34. BATC No. 24h: Provide information on the location, nature, operation and contents of the underground storage tanks.

35. BATC nos. 26a and 26b: State when the technique will be in place.

Soil treatment area (Ref item 18)

36. In place of an air extraction and treatment system in the soil treatment area, please clarify how the building will be ventilated following complete enclosure ("i.e. on all sides") and whether the internal air will be moisture, dust and/or VOC laden due to the use of aerosols, spray bars and chemicals in the management of dust and odours. Provide a simple drawing showing the nature of the enclosure and the location of doors. State how fugitive emissions will be avoided when the door or doors are opened.

Processed fuel oil (Ref item 19)

37. If not confidential information, and by reference to page 2 of your response to question 7 of our notice dated 26/1/2016, state which waste oils are selected (e.g. by LoW code) for production of 19LS. State whether this will change if and when the new thermal expansion unit process is introduced.

38. In table 19.2 of your response dated 17/5/2016, explain the significance of the exceedences for sulphated ash, nickel and vanadium in batches no. 35 and 36. By reference to your statement that "the process is either extended or part of the process repeated to ensure the batch meets the desired specification", state how process extension or repeat of the process reduced or would have reduced the concentration of sulphated ash, nickel and vanadium to the desired specification.

39. The legal opinion provided with your response dated 17/5/2016 refers to REACH. Please clarify the status of 11LS and 19LS in the context of REACH.

Baseline report (Ref item 20)

40. In relation to groundwater monitoring, please provide a short report on the quarterly monitoring of groundwater quality at all monitored boreholes. The report should cover the years 2014, 2015 and 2016 to date. The following is a proposed format for monitoring results. One table should be generated for each monitoring borehole.

Year and quarter	Parameter and unit	Value recorded	Relevant hazardous substance, if any, for which the parameter is an indicator

Q1 2014	Chloride (mg/l)		

41. Provide any information on soil measurements carried out at the installation.

42. Provide, in accordance with Regulation 9(2)(n) of the Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013, a baseline report. The baseline report should, in accordance with Section 86B of the EPA Act 1992 as amended, contain the information necessary to determine the state of contamination of soil and groundwater at the time the report is drawn up in order that a quantified comparison may be made to the state of the site upon the permanent cessation of the activity.

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

In the circumstances you should make immediate arrangements to have the required information (1 signed original, 1 hardcopy and 2 copies of all files in electronic searchable PDF format on CD-ROM) submitted to the Agency without delay. Your response to this request should be directed to Noeleen Keavey, Administration Officer, Office of Climate, Licensing and Resource Use.

Yours sincerely,

Brian Meaney
Environmental Licensing Programme
Office of Environmental Sustainability