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

11/10/2016

Reg No: W0184-02

Dear Mr Kelly

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

I am to advise that in accordance with the provisions of Section 90 of the EPA Act 1992 as amended, you are requested to supply the following additional information so that the Agency may complete a comprehensive assessment of the review.

1. Provide a copy of the licensee's certificate of incorporation, showing the company register number. If this is different to the name on the existing licence, please clarify the matter.
2. State whether the licensee holds or is required to hold a greenhouse gas permit in relation to activities at the installation. If yes, provide information on the permit.
3. Describe the installation's place in the context of and in delivering the objectives of relevant regional waste management plans and the National Hazardous Waste Management Plan.
4. With reference to table E.1(i) provided with item 12 of your response dated 6 September 2016, please state the thermal input value of the boiler in MW.
5. By reference to the new emission points A3-53 and A3-57, please explain the context and purpose of the caustic scrubber mentioned as abatement on these emissions to air.
6. Please provide a drawing showing the location of the following emission points, existing and proposed:
 - A1-1, steam raising boiler stack
 - A2-1, regenerative thermal oxidiser stack
 - A3-52, oil filtration plant carbon filter stack
 - A3-56, tank farm ring main carbon filter stack
 - A3-53, hodgefield separator carbon filter stack

- A3-54, tanker dig-out building and tanks 18 and 19 carbon filter stack
 - A3-57, WW1, WW2, WW3 and WW4 and reactor tanks 1 and 2 carbon filter stack
7. In the final pages of item 29 of your response dated 6 September 2016, there is a discussion that contains two tables, 29.1 and 29.2.
 - a. The headings of these tables appear inconsistent. Please examine and clarify.
 - b. The reference to table 29.1 in the text beneath table 29.1 appears to be incorrect. Please examine and clarify.
 8. Provide design information on the carbon filters as installed and proposed. In particular:
 - a. Provide information that demonstrates that the carbon filters (installed and proposed) have been sized adequately.
 - b. State how the fans have been sized and where they are located relative to the carbon filters and whether they are integrated into the carbon filter package plant.
 9. In the context of the carbon filters in place and proposed, complete table F.1 of the licence application form. When completing the table, and if necessary provide supplementary information, ensure you describe in detail the control procedures for the carbon filters, including the following:
 - a. What process parameters will be monitored to show that the equipment is operating properly?
 - b. What are the set-points or ranges for these process parameters?
 - c. In the context of the monitored process parameters, what informs the decision as to when the carbon medium should be replaced?
 - d. State the expected frequency for carbon medium replacement or regeneration.
 - e. Describe the procedure for replacing or regenerating the carbon medium in each filter.
 - f. How long does it take to procure the replacement/regeneration service or to carry it out in-house?
 - g. State what mitigation measures or alternative abatement techniques will be in place during carbon filter downtime.
 10. For the ring main, state why air will be mechanically drawn to the carbon filter (or RTO) and how this affects the function of the ring main as a vapour balancing technique. For each of the other carbon filter installations, provide a similar analysis in the appropriate context of a drawn flow as opposed to passive flow.
 11. Describe the measures in place at the installation to prevent accidents and limit the consequences of accidents should they occur. In particular describe the measures in place to prevent accidents associated with the ring main and the tank balancing system, including associated mitigation and process equipment. Identify the location of any relevant pressure relief valves, flame

arrestors and other key equipment, installed and proposed. Describe how the triggering of pressure relief valves or use of other key equipment will be logged.

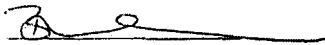
12. Provide further justification why the oil storage tanks used by Emo are not proposed for inclusion in the ring main nor treatment system for off-gases. Describe the vents in place on these tanks. State the concentration of VOC in off-gases as measured at these tank vents.
13. State whether the installation is an establishment to which the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 apply.
14. Provide contour plots for ground level concentrations for all parameters and scenarios from air dispersion model calculations, cumulative from all emission points, existing and proposed. Show the location of the installation boundary and sensitive receptors on all contour plots. The following earlier information refers:
 - Item 17 of response dated 17/5/2016;
 - Items 15 and 29 of response dated 6/9/2016.
15. Provide an assessment of the potential noise impact arising outside the installation boundary as a result of the soil washing activity described in item 7 of your response dated 17 May 2016. Consider the potential impact in the context of doors open and doors closed in the soil building.
16. Provide a drawing showing the path followed by stormwater discharged at SW1 and SW2 to local watercourses and to the River Trioguc.
17. In relation to stormwater discharge at SW1 and SW2, please address the following issues:
 - a. State whether the discharges at SW1 and SW2 comprise any source other than stormwater.
 - b. State what preventive measures have been or are proposed to be put in place to ensure that stormwater is, to the extent possible, uncontaminated upon discharge.
 - c. Propose revised trigger levels for implementation at discharge points SW1 and SW2 that are demonstratively protective of water quality and for the following parameters: TOC, COD, suspended solids, pH. Other parameters may be proposed in addition.
 - d. State whether continuous monitoring of TOC (or other appropriate parameters) is appropriate at SW1 and SW2.
18. A screening for Appropriate Assessment was undertaken on 10/10/2016 and the Agency determined that an Appropriate Assessment of the activity is required. You are thereby required to submit a Natura Impact Statement, as defined in Regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended. You are furthermore advised to refer to the document '*Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities*', issued in 2009 by the Department of the Environment, Heritage and Local Government, and revised in 2010. This

document is available at:
http://www.npws.ic/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf.

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 at the address above.

It should be noted that where there is failure to comply with the above requirements within one month of this notice, the Agency may proceed with its consideration of this application in the absence of the information requested.

Yours sincerely,



Brian Mcancy
Office of Environmental Sustainability