

Submission on objection
No. 4

Noeleen Keavey

Subject: FW: W0184-02 Enva
Attachments: Enva Letter to EPA W0184-02 130217.pdf

From: Gareth Kelly [mailto:gkelly@enva.com]
Sent: 13 February 2017 11:32
To: Eve O'Sullivan
Cc: Wexford Receptionist; Anne Phelan
Subject: W0184-02 Enva

Environmental
Protection Agency

13 FEB 2017

Dear Ms O'Sullivan

Please see attached correspondence (to Noeleen Keavey) in relation to the licence review process for W184-02.

Yours sincerely

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Founded over 40 years ago, Enva has developed to become Ireland's leading Organic and Hazardous Waste Recovery, Water Services and Analytical Services provider. Our highly experienced team of engineers, operatives and scientists operate across Ireland from four EPA licenced facilities, two NIEA licenced facilities, and two INAB approved laboratories Reg. Scope 185 T. We focus on safety and excellence and are ISO 9001, 14001, and OHSAS 18001 certified. Enva is a DCC plc owned company www.dcc.ie

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Environmental
Protection Agency
13 FEB 2017

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Ms Noleen Keavey,
Office of Environmental Sustainability,
Environmental Protection Agency,
Johnstown Castle Estate,
Co Wexford.

Date: 13th of February 2017

Licence Ref. No: W0184-02

RESPONSE TO OBJECTIONS

Dear Ms Keavey,

Further to your correspondence dated 13/1/2017 regarding two third party objections lodged against the Proposed Determination W0184-02, Enva would make the following response:

Objection No 1.

The objection refers to certain planning applications and the proposed Western Circular Route. While we are not privy to the full reasoning behind the choice of the final route for this road, we are of the understanding that the decision not to route the Western Circular Route along the roadway (alongside Enva) was not on health & safety grounds but was largely influenced by the fact that part of the proposed route would have traversed Enva's facility (i.e. was in Enva's ownership and use).

In relation to the concerns expressed regarding odour it is contended that these have been dealt with fully as part of the licence review process and that the measures in place and further measures proposed are sufficient to prevent nuisance odours from the Enva facility.

Objection No. 2

The objection lists a selection of extracts from odour complaints over a number of years that are asserted to arise from Enva's facility. All odour complaints received by Enva are investigated and in many cases the odour complaints have been concluded not to have related to Enva's activities. While it is accepted that there have been occasions where nuisance odours have been created by the activities at Enva's facility there are many occasions where odours have been wrongly attributed to Enva. The objection creates a perception that there is a chronic odour issue associated with the Enva facility which is simply not the case. This is substantiated by the extensive odour monitoring carried out in the local area by the EPA, their contracted agents and Enva's contracted agent (RPS). It is worth noting that during 2016 RPS conducted in excess of 700 odour surveys and did not detect nuisance odours attributable to Enva in the local area. These surveys were carried out over a total of 164 days (between Monday and Saturday), during the hours of 7am to 11pm so as to coincide to the sites activities. Enva continues to engage with local residents and neighbours in relation to potential odour

nuisance, with the predominant feedback being that odour associated with Enva's activities is no longer an issue of concern. This is in addition to many local residents noting that it never was an issue for them.

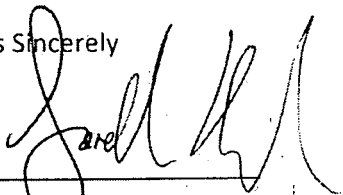
In relation to the proposed RTO, the objection asserts that the RTO has not been sized appropriately and will breach the proposed licence limits. In fact the RTO has been sized very conservatively, being capable of treating up to 160kg of VOCs per hour. This compares with an overly conservative estimated loading of circa 10kg/hr, which could theoretically be generated if all 21 tanks capable of being heated were to be heated at the one time (when in practice only 3 tanks are normally heated at any one time). As a result there is an order of magnitude of spare capacity available in the RTO as proposed.

Ultimately it is the emission limits relating to the RTO contained within the revised licence that Enva will have to comply with as a matter of law in order to operate the facility. Any failure of Enva to meet any emission limit would be a matter for further enforcement action from the Agency as required.

In regard to the recovered fuel oil products (11LS & 19LS) Enva has provided the Agency with a detailed assessment which demonstrates that use of the products as a fuel does not present any significantly greater risk to human health or the environment than the use of comparative fuels.

If you wish to clarify any matter further please do not hesitate to contact me.

Yours Sincerely



Gareth Kelly
Director

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