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02 June 2017

Reg. No. W0211-02

Dear Mr Mullally

I refer to your response dated 14/03/2017 to Agency's correspondence of 16/12/2016.

I am to advise in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licencing) Regulations 2013, that the following information is required in support of the application under Regulation 9 of the Regulations:

Discharge and emission to surface water

1. Please refer to "*Attachment 1: Monitoring results effluent emissions 2014 and 2015*". It shows relatively high levels of TSS at SE1 in 2015 when compared to its levels in 2014 and 2016. There was no explanation given for these spikes. Please provide an explanation for the spikes and measures taken to avoid a reoccurrence.
2. The response to point 10 of EPA's correspondences of 6/12/2017 is not to the satisfaction of the Agency. Provide a comprehensive environmental assessment of impact resulting from the discharge of treated effluent (discharged via SEI) on water quality in the receiving water (at the point of its discharge to the receiving water). The assessment should consider the discharge of the treated effluent alone and cumulatively in combination with other relevant wastewaters discharged into the same water body.

Air dispersion model report

3. Update table 3.1 to 3.4 contained in the odour and air quality impact assessment report with their correct headings and re-submit the tables only.
4. In response to point 15 of EPA's correspondences of 6/12/2017, you stated that modelling of SO₂ is not required. This is not to the satisfaction of the Agency. Please revise the air dispersion modelling to take into consideration SO₂ emissions at A1 (sludge dryer boiler stack).
5. Provide technical details to demonstrate that the stated extraction rate of 30,000Nm³/hr in relation to the odour control unit is feasible (response no. 22b).
6. Provide further clarification with relevant calculations, in relation to the number of air changes per hour to be provided by the design extraction rate of (<15,000Nm³/hr) for Building 2 (response no. 22f).
7. It is stated in your response to point 23 that odour complaints received in 2016 were traced to opening doors of buildings to receive materials. Provide detailed measures taken to isolate and prevent odour nuisance or its reoccurrence from these (door) sources during the receipt of materials.

8. The response to point 27 of EPA's correspondences of 6/12/2017 is not to the satisfaction of the Agency. The correlation between tonnes and cubic metres was not evident. Provide clear and detailed response for EACH building and / or treatment process in relation to storage and treatment capacity.

Appropriate Assessment

9. Your response to point 39 is not to the satisfaction of the Agency. Provide a revised Natura Impact Statement (NIS). The revised NIS should consider the implications and impact of discharges from the installation without the AquaCritox process on the adjacent SAC and SPA

Baseline Report

10. It is noted that soil quality investigations used in the preparation of the Baseline Report did not include the chemical analysis of the soil samples collected during the investigation. A chemical analysis of soil samples from the installation site should be analysed for the following parameters as a minimum: Total Poly Aromatic Hydrocarbons (PAH); Extractable Petroleum Hydrocarbons (EPH); Mineral Oil; Gasoline Range Organics (GRO); Benzene, Toluene, Ethylbenzene, Xylene (BTEX); Pesticides; Polychlorinated Biphenyls (PCB); Total Phenols; Natural Moisture Content; Chloride; Sulphide; Chromium VI; heavy metals; pH; Total Cyanide; Free Cyanide; and Thiocyanate. Results should be compared to standards outlined in the EPA publication Towards Setting Environmental Quality Objectives for Soil Developing a Soil Protection Strategy for Ireland, A Discussion Document, 2000 and any other appropriate standards.
11. Please provide a revised Baseline Report that reflects the results obtained from the chemical analysis of the soil samples.
12. The Baseline Report submitted contains in Appendix 1, a DRAFT of a "Report on site investigation...Report No. 11303". Please submit a final version of this report with the updated Baseline Report.

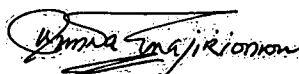
In addition to the above please also provide an updated non-technical summary to reflect the information provided in your reply.

The requested information should be submitted to the Agency within *eight weeks* of the date of this notice, in order to allow the Agency to process and determine your application.

In the circumstances, you should make immediate arrangements to have the required document(s) (1 signed original and 1 copy in hardcopy format, 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 Grainne Oglesby, Administration Officer, Office of Climate, Licensing & Resource use.

It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact Dr Magnus Amajirionwu at the number above.

Yours sincerely



Dr. Magnus Amajirionwu
Environmental Licensing Programme
Office of Environmental Sustainability