

## **EPA Application Form**

# 7.4.1 - Emissions to Atmosphere - Main and Fugitive



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## **Amendments to this Application Form Attachment**

Version No.	Date	Amendment since previous version	Reason
V.1.0	July 2017	N/A	Online application form attachment
As above	Mar 2017	Identification of required fields	Assist correct completion of attachment
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#### **EMISSIONS TO ATMOSPHERE**

Emissions to air/atmosphere include the following:

#### **Main Emissions**

Main emissions include all emissions of environmental significance. Where a **mass emission threshold** is specified in a BAT document (BAT Conclusions, National BAT note or BREF), emissions which exceed this threshold prior to abatement are regarded as significant, i.e., 'main emissions'. (In some cases emissions below the threshold can still be significant and qualify as Main Emissions).

#### **Minor Emissions**

Emissions below the mass emission threshold <u>may</u> be considered minor emissions and therefore do not generally need to be specifically controlled by the conditions or schedules of the licence (i.e., setting of ELVs, abatement control measures, or monitoring requirements). Emissions may also be deemed minor by virtue of their source/nature (e.g., laboratory fume hoods, workspace extractions, passive vents from storage tanks, HVAC exhausts), or composition (e.g., water vapour emissions).

For combustion plant such as boilers, these can be considered minor where the rated thermal input is < 1MW where natural gas is the main fuel, and for liquid and solid fuels where its < 250kW.

In completing the separate 'Emissions to Atmosphere - Minor and Potential' attachment for minor emissions, the applicant should supply sufficient information to justify the determination of the emission as minor. Notwithstanding this guidance, the Agency may consider any emission to be significant (i.e., a main emission) on the basis of environmental impact.

#### **Fugitive Emissions**

Fugitive emissions include emissions from non-point sources and diffuse sources.

#### **Potential Emissions**

These are emissions which only operate under abnormal process conditions. Typical examples include bursting discs, pressure relief valves, and emergency generators. Bypasses and flares may also fall within this category, depending on how they are operated or designed to operate. Although the Agency does not normally set controls in licences for potential emissions, it may do so for the purposes of environmental protection.

This attachment collects information on <u>main</u> and <u>fugitive</u> emissions to atmosphere. Waste gas means the final gaseous emission from a stack or abatement equipment.

For minor and potential emissions to atmosphere, complete the separate 'Emissions to Atmosphere - Minor and Potential' attachment.



#### Main Emissions to Atmosphere - Waste Gas Emission Point Details - one row per emission point \*

Complete the following table with summary details for all main emission points to atmosphere.

(Guidance on completing the table is included in Note i at the end of this attachment)

The applicant should address in particular any emissions which may contain the principal polluting substances listed in the First Schedule of Environmental Protection Agency (Integrated Pollution Control) (Licensing) Regulations 2013/ (Industrial Emissions)(Licensing) Regulations 2013.

Please note that the determination of any emission limit values and monitoring requirements in a proposed licence if granted will be based on the information supplied hereunder.

Emission		n Point Grid Ref.	Typical Days	Measures to reduce /minimise / prevent emissions (list techniques) <sup>1</sup>	Source of Waste Gases	Minimum Discharge		Reference	Conditions	
Point Code	Easting <sup>3</sup>	Northing <sup>4</sup>	Usage/ Year	Where EQS considerations require measures stricter than BAT, highlight these measures in <b>bold</b>	Ref all office 2	Height Above Ground (m)	Pressure 5	Temp.	% Oxygen	Moisture 8
EP 1 - Boiler	616317	594648		OR PHER PHILIP	Boiler					
EP 2 - Incinerator	Not yet determi ned	Not yet determine d		for inspection of copyright owner	Incineration					
				Consent						

<sup>&</sup>lt;sup>1</sup> Detailed descriptions and schematics of all abatement systems should be included in the Operational Report (Tab 4.8 – 'Reports').

<sup>&</sup>lt;sup>2</sup> **Options:** Boiler, Gas Turbine, Incineration, Co-Incineration, CHP, Kiln, Engine, Indirect drying activity (e.g. milk drying), Other Combustion activity (e.g., oven), Distillation/Chemical reaction, Solvent based coating activity, Other coating activity (provide description), Composting Tunnels, General extraction from buildings **or** Other (provide a description if '**Other**' is selected).

<sup>&</sup>lt;sup>3</sup> Six Digit GPS Irish National Grid Reference.

<sup>&</sup>lt;sup>4</sup> Six Digit GPS Irish National Grid Reference.

<sup>&</sup>lt;sup>5</sup> **Options:** 101.325kPa <u>or</u> No correction.

<sup>&</sup>lt;sup>6</sup> **Options:** 273.15K or No correction.

<sup>&</sup>lt;sup>7</sup> **Options:** 3%, 6%, 10%, 11%, 15%, 18% <u>or</u> No correction.

<sup>&</sup>lt;sup>8</sup> **Options:** Wet **or** Dry.



Emission		Point Grid Ref.	Typical Days	Measures to reduce /minimise / prevent emissions (list techniques) <sup>1</sup>	Source of Waste Gases	Minimum Discharge		Reference	Conditions	
Point Code	Easting <sup>3</sup>	Northing <sup>4</sup>	Usage/ Year	Where EQS considerations require measures stricter than BAT, highlight these measures in <b>bold</b>	2	Height Above Ground (m)	Pressure 5	Temp.	% Oxygen	Moisture 8
					Jeg.					

<sup>\*</sup>add rows to the table as necessary



#### **Emission Points from Combustion, Incineration or Co-incineration Sources Only**

Complete the table below for each emission point to atmosphere from a combustion source, waste incineration or co-incineration plant

Emission Point Code	Primary Fuel Type <sup>9</sup> (where applicable)	Secondary Fuel Type <sup>10</sup> (where applicable)	LCP Plant Reference (where applicable)	Waste incineration or co- incineration plant reference (where applicable)
EP1 Boiler	Pig Slurry	n/a		
EP2 Incinerator	Fallen Animals	n/a		
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<sup>\*</sup>add rows to the table as necessary

<sup>9</sup> **Options:** Coal, Lignite, Heavy Fuel Oil, Other Fuel Oil, Peat, Natural Gas, Biogas, Solid Biomass, Waste, Gas Oil, Other <u>or</u> None

<sup>&</sup>lt;sup>10</sup> **Options:** Coal, Lignite, Heavy Fuel Oil, Other Fuel Oil, Peat, Natural Gas, Biogas, Solid Biomass, Waste, Gas Oil, Other <u>or</u> None



#### **Emission Points with Solvent Emissions Only**

Complete the table below for each emission point associated with a solvent activity

Emission Point Code	Are specific Hazardous Substances <sup>11</sup> Emitted?	Mass Flow of Emitted Hazardous Substances (g/hour)	Halogenated VOCs <sup>12</sup> Emitted?	Mass Flow of Emitted Halogenated VOCs (g/hour)
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*add rows to the	table as necessary		Cox	

<sup>\*</sup>add rows to the table as necessary

Emissions of volatile organic compounds referred to in Article 58 (Substances or mixtures which, because of their content of volatile organic compounds classified as carcinogens, mutagens, or toxic to reproduction under Regulation (EC) No. 1272/2008, are assigned or need to carry the hazard statements H340, H350,H350i, H360D or H360F) of the Industrial Emissions Directive.

Halogenated volatile organic compounds which are assigned or need to carry the hazard statements H341 or H351.



## **Waste Gas Emission Monitoring Points**

Complete the table below for each emission point, by entering the Emission Point Code, the associated Monitoring Point Code and the grid reference of the Monitoring Point. \*

Emission Point Code	Monitoring Roint Code 13	Monitoring Point	Grid Reference
Emission Point Code	Monitoring Point Code <sup>13</sup>	Easting <sup>14</sup>	Northing <sup>15</sup>
EP1 Boiler	EP1 Boiler	616317	594648
EP2 Incinerator	EP2 Incinerator	Not yet determined	Not yet determined
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<sup>\*</sup>add rows to the table as necessary

<sup>&</sup>lt;sup>13</sup> To include monitoring and sampling points

<sup>&</sup>lt;sup>14</sup> Six Digit GPS Irish National Grid Reference

<sup>&</sup>lt;sup>15</sup> Six Digit GPS Irish National Grid Reference



## **Waste Gas - Abatement /Treatment Control**

Complete the table below for each emission point with an abatement/treatment system (one table per emission point)

LIIIISSIUII FUIIIL CUUE.	<b>Emission</b>	Point	Code:		
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Control <sup>16</sup> parameter	Monitoring to be carried out <sup>17</sup>	Additional notes (where relevant)
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*add rows to the table as necessary	to on the constraint of the co	

<sup>\*</sup>add rows to the table as necessary

 $<sup>^{\</sup>rm 16}$  List the operating parameters of the treatment/abatement system which control its function.

List the monitoring of the control parameter to be carried out.



#### **Waste Gas Emissions**

Complete the table below for all main emission points to atmosphere (include one row for each identified parameter) \*

Emission				Prop	osed Emiss	sion Limits	18	BAT Associated	Sampling / Monitoring  EPA Guidance for Monitoring - AG2 Index of Preferred Method		
Point Code	Parameter	Monitoring Point Code	Max. Hourly	Max. Daily	Average Month	Average Annual	How was the Proposed Emission Limit Derived?	Emission Range (if applicable)	Proposed Monitoring Frequency	Proposed Monitoring and Analysis Method <sup>23</sup>	Compliant with BAT Monitoring Requirement?
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<sup>\*</sup> For continuous monitoring 'EN15267 approved CEMS' is the standard method. For periodic monitoring please refer to the EPA guidance document 'AG2 Index of Preferred Methods' linked above

<sup>\*</sup>add rows to the table as necessary

For emissions outside the BAT Conclusion, BREF or BAT guidance limit, a full evaluation of the existing abatement/treatment system must be provided. A planned programme of improvement towards meeting upgraded standards is required. This should highlight specific goals and a time scale, together with options for modification, upgrading or replacement as required to bring emissions within the limits set out in the BAT Conclusion(s), BREF(s) or BAT guidance note(s). These notes can be found on the EPA website at <a href="https://www.epa.ie">www.epa.ie</a>.

<sup>&</sup>lt;sup>19</sup> Specify the proposed limit <u>and</u> the units.

<sup>&</sup>lt;sup>20</sup> Specify the proposed limit **and** the units.

<sup>&</sup>lt;sup>21</sup> Specify the proposed limit <u>and</u> the units.

<sup>&</sup>lt;sup>22</sup> Specify the proposed limit **and** the units.

<sup>&</sup>lt;sup>23</sup> For continuous monitoring 'EN15267 approved CEMS' is the standard method. For periodic monitoring please refer to the EPA guidance document <u>'AG2 Index of Preferred Methods'</u>.



## Minor and/or Potential Emissions to Atmosphere <sup>24</sup>

Are there any minor <u>or</u> potential emission point(s) to atmosphere at the installation/facility? Yes (Yes/No) \*

If 'Yes' complete and upload the *Emissions to Atmosphere – Minor and Potential Emissions* template with details of minor and potential emissions (select Document Type: 'Minor - Potential Emissions' in the application form)

**Emissions to Atmosphere - Minor - Potential Emissions** file name:

7.4.2 Air Minor Potential

Refer to page 3 for guidance on what constitutes a minor or potential emission.



Yes

## **Fugitive Emission to Atmosphere**

Fugitive emissions must be controlled by way of appropriate controls and techniques to minimise emissions. (Additional information on fugitive emission is included in Note ii at the end of this attachment)

Are there any sources of fugitive emissions at the installation/facility? <sup>25</sup> (Yes/No) *
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If 'Yes' provide summary details of the fugitive emissions in the table below:

Type of Fugitive Emission	Emission Type Applicable? (Yes/No)	Description of fugitive emissions source(s)	Maximum Level	Units	Descriptor/Location
Dust	Yes	From pig houses, feed and manure movement	Unknown	mg/m²/day	Dust deposition
VOC <sup>26</sup>		nut pose se a la company de		%	of solvent input
Ammonia	Yes	From pig houses and manure movement	Unknown	ug/m³	at the nearest European Site
Nitrogen	Yes	From pig houses and manure movement of the little	Unknown	kgN/ha/yr	at the nearest European Site
Odour	Yes	From pig houses and manure movement	Unknown	Odour Units	at boundary of installation

For waste activities, dust and odour emissions should be considered and described in the table below where applicable.

In relation to activities listed in Chapter V (for installations using Organic Solvents) of the Industrial Emissions Directive (2010/75/EU):

specify how the requirements in relation to fugitive emissions will be met.



rovide details of the techniques to be used to reduce / minimise / prevent fugitive emissions in text bow below				

Note i

Note i Complete the table for each emission point having regard to the quidance hereunder.

The following convention should be observed when labelling emission points:

**Boiler Emissions** A1-1, A1-2, A1-3,...etc. **Main Emissions** A2-1, A2-2, A2-3,...etc.

Minor Emissions A3-1, A3-2, A3-3,...etc. (NOTE: Minor emission points are to be included in the 'Emissions to Atmosphere - Minor and Potential'

attachment)

Potential Emissions A4-1, A4-2, A4-3,...etc. (NOTE: Potential emissions are to be included in the 'Emissions to Atmosphere - Minor and Potential'

attachment)

A National Grid Reference (12 digit, 6E, 6N) must be provided for each emission point.

Measures are usually required to reduce, minimise or prevent emissions from occurring. They may involve the application of a single technique or a combination of techniques including process integrated, recovery, abatement and treatment techniques. List all techniques proposed/employed. Technique(s) employed must comply with BAT. Highlight additional measures required for the purposes of protecting the environment i.e. AQS considerations. The measures or techniques to be taken must be capable of complying with the proposed/known emission level(s).

The measures required shall be informed by the following:

- 1. BAT techniques with BAT-AEL
- 2. BAT techniques without BAT-AEL
- 3. Stricter measures/techniques than BAT (due to AQS)
- 4. BAT determined by competent authority in consultation with the applicant
- 5. Measures to minimise pollution over long distances or in the territory of other states.
- 6. Emerging techniques
- 7. Less strict measures than BAT (due to derogation)
- 8. Other measures

Select from the drop down list the source of the emission as it helps explain the nature of the emission.

Particular attention should be paid to ensuring that emissions data (volumetric flow and pollutant concentrations) are presented at the required reference conditions for oxygen, temperature, pressure and moisture.



#### Fugitive emissions include the following:

- Dust from area sources such as a quarry.
- Odour from volume sources such as a pig unit, waste water treatment plant, waste handling etc.
- VOCs from processes using solvent not captured in waste gases.
- Ammonia and nitrogen from pig and poultry units.

#### Processes that can give rise to fugitive emissions include:

- o Leaks from valve seals, pump seals and flanges;
- o Breathing and working losses from liquid storage facilities;
- o Dust emissions from solids stored in the open;
- o Loading and unloading operations;

o Loading and unloading operations;
o Cleaning operations; and,
o Emissions from waste water treatment (e.g. volatile organics).

The measures taken to reduce/ prevent fugitive emissions to atmosphere must be addressed, and the facilities and operations required to control emissions must be detailed.