

1.0 Amendment of Schedule B.1.3 & Condition 4.2.2

Schedule B.1.3 specifies a maximum flow volume of 3,000 Nm³/hr for the emissions from the combined heat and power (CHP) plant. Condition 4.2.2 stipulates that the concentration and volume flow limits for emissions to atmosphere from the CHP shall be based on gas volumes under standard conditions of Temperature 273K, Pressure 101.3 kPa, and, after correction for the waste vapour content of the waste gasses at a standardised O₂ content of 15%.

ERAS ECO considered that the 3,000 Nm³/hr maximum flow volume specified in Schedule B.1.3 and the standardised O₂ content of 15% were clerical errors on the basis that information provided in the licence application including air dispersion modelling, which was based on a flow volume rate of 6,200 Nm³/hr at a standardised O₂ content of 5%.

In August 2019, ERAS ECO requested the Agency to amend Schedule B.1.3 to increase the flow volume to 6,200 Nm³/hr. In June 2021, the Agency determined that the Schedule could not be Technically Amended and concluded that a Licence Review was required.

ERAS ECO requests amendments to Condition 4.2.2 and Schedule B.1.3 to be consistent with the air dispersion modelling upon which the Agency based its decision to grant W0211-02. The amendments are;

Condition 4.2.2: Replace the standardised O₂ content of 15% with a standardised O₂ content of 5%.

Schedule B.1.3: Replace the flow volume of 3,000 Nm³/hr with a flow volume of 6,200 Nm³/hr.

2.0 Amendment of Condition 1.5.2

For clarity and the avoidance of doubt over the operational hours ERAS ECO requests the wording of the condition to be amended as follows:

‘Except for the biological treatment processes, which may operate continuously, or as otherwise approved by the Agency, the permitted operational hours are 0700 and 1900 Monday to Saturday inclusive with the exception of construction activities, which shall cease by 1700 on Saturdays’.

3.0 Amendment of Schedules A1 & A2

Schedule A 1 of the current licence authorises;

- i) the acceptance and treatment (thermal drying) of third party wastewater treatment plant sludge in one of the waste processing buildings (Building 2), with the associated odour abatement system and process wastewater treatment system,
- ii) anaerobic digestion (AD) in a second building (Building 1) with its associated digesters, holding tanks, gas utilisation engines and odour abatement systems.
- iii) the handling, processing and transfer of mixed dry recyclable wastes in Building 1.

Table A 2 of Schedule A 2 sets the following maximum annual intake limits

Waste Type	Maximum (Tonnes Per Annum)
Non-hazardous sludge and food waste sludge, sludges from industrial and municipal wastewater treatment plants for treatment in a sludge dryer and anaerobic digesters as listed in Schedule A 1	40,000
Non-hazardous liquid waste that is conducive to treatment by anaerobic digestion as listed in Schedule A 1	5,000
Mixed dry recyclables for activities as in Schedule A 1	20,000

ERAS ECO stopped accepting and processing mixed dry recyclable waste in 2013 and in July 2018 stopped accepting sludge for thermal drying and does not intend to restart either activity. The amendments to Schedule A1 and A2 are to allow ERAS ECO to accept 65,000 tonnes of organic waste annually for treatment in the anaerobic digestion plant.

4.0 Amendment of Condition 3.7.2 and deletion of Condition 3.7.3.

This condition requires a wheel cleaning unit to be used by all vehicles leaving the site and the treatment of the washwater in the on-site process wastewater treatment plant. The wheels of waste transport vehicles are power washed inside the AD reception building. The washwater is collected and added into the AD feedstock. The on-site process wastewater treatment plant has been decommissioned.

5.0 Deletion of Condition 3.20.2

This condition requires that the integrity of underground liquid feedstock pipes be monitored by an automatic leak detection system. At the facility the use of underground process pipework is minimised and the only underground feed stock pipes are either fully encased in concrete, or located in a sealed concrete channel.

The site is underlain by up to 3m of made ground that overlies up to 11.6m of glacial till, which in turn overlies up to 2m of sandy gravel. The type and depth of the subsoils provides effective protection of the bedrock aquifer from contaminants released at the ground surface and in the shallow sub-surface.

Technique: *Design and maintenance provisions to allow detection and repair of leaks*

Description: *Regular monitoring for potential leakages is risk-based, and, when necessary, equipment is repaired. The use of underground components is minimised. When underground components are used, and depending on the risks posed by the waste contained in those components in terms of soil and/or water contamination, secondary containment of underground components is put in place.*

Applicability: *The use of above-ground components is generally applicable to new plants. It may be limited however by the risk of freezing. The installation of secondary containment may be limited in the case of existing plants.*

The provision of an automated leak detection system is not a BAT requirement. The existing measures are consistent with BAT 19 (h) Best Available Techniques (BAT) Reference Document for Waste Treatment (2018)

6.0 Deletion of Condition 3.26 and Schedules C.4.1 and C.4.2.

The process wastewater treatment plant has been decommissioned,

7.0 Amendment of Condition 3.27

Schedule 3 of S.I. No. 605/2017 - European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017, as amended (Regulations) specifies the holding periods for livestock manures. For counties Carlow, Cork, Dublin, Kildare, Kilkenny, Laois, Offaly, Tipperary, Waterford, Wexford and Wicklow the storage period is 16 weeks. All of the landbanks on which the ERAS ECO digestate is applied are in these counties.

Schedule 4 of the Regulations specifies the time periods when the land application of fertilisers is prohibited. In counties Carlow, Cork, Dublin, Kildare, Kilkenny, Laois, Offaly, Tipperary, Waterford, Wexford and Wicklow this time period is 15th September to 12th January i.e. sixteen weeks. During this period the digestate is stored.

ERAS ECO requests that the minimum storage provision be amended from 26 weeks to 16 weeks to bring the condition into alignment with the Regulations.

8.0 Deletion of Conditions 6.14.6, 6.14.7, 6.14.8 and 6.14.10

All these conditions relate to the operation of the sludge drying plant, which has been decommissioned.

9.0 Amendment of Condition 8.7.8

This condition requires the 'cleaning of the floor and surfaces of the feedstock bays daily, or when cleared of waste and in any event every 48 hours'. The feed stock bays are constantly replenished and it is not practical to clean them every 48 hours, as this would require the feedstock to be removed from the bay while it was being cleaned and then moved back into the bay. ERAS ECO requests the condition be altered to remove 'and in any event every 48 hours'.

10.0 Deletion of Schedules B.1.1 and B3.

As the boiler and the process wastewater treatment plant have been decommissioned, there are no and will not be emissions at A1 and SE-1.

11.0 Amendment of Schedule C.3.4

The Schedule requires continuous monitoring of TOC. A continuous TOC monitor has not been installed. The surface water emission comprises rain water run-off from building roofs and areas of the site that are not at risk of significant contamination. The shut off valve on the storm water attenuation tank is closed and only opened to allow the release of the water to the storm sewer following confirmation that the water quality is satisfactory. The monitoring of the storm water retained in the tank confirmed the quality consistently satisfies the requirements of Schedule C.3.1.

Although Condition 6.8 facilitates the amendment of the frequency, methods, and scope of the monitoring and analyses set out in the licence, for the avoidance of doubt ERAS ECO requests that Schedule C.3.4 be amended to delete the requirement for continuous TOC monitoring.

12.0 Amendment of Schedule D

12.1 Odour Control Unit

The site was developed as an integrated facility with both processing buildings, office and yards sharing the same services. The sludge drying plant and associated ancillaries, including the on-site wastewater treatment plant, the biofilter and the carbon filter have been decommissioned.

It was the intention to technically amend the licence to revise the licence boundary to remove the sludge drying building and associated operational area. This would allow building to be used for the manufacture of an animal nutrient product, which is not a licensable activity. In July 2019 ERAS ECO submitted a Technical Amendment request to alter the boundary, and in July 2020 submitted an Independent Closure Audit Report to the Office of Environmental Enforcement (OEE).

Subsequently ERA ECO carried out the infrastructural works (provision of a retaining kerb along what would be the revised licence boundary and installation of three shut off valves on the surface water drainage system) that the OEE considered necessary in order to progress the boundary alteration request.

In September 2021, the OEE completed an Exit Audit (Ref SV22670). This concluded that 'the site was considered to be satisfactory and not likely to pose any further risk to the environment pending all corrective actions are completed'. The corrective actions include the provision of stand-alone services (mains water supply, electrical supply, surface water systems and firewater supply) to the Anaerobic Digestion Plant.

The costs and time involved to provide separate services to the Anaerobic Plant and the uncertainty over a timeline for a decision on the Technical Amendment presents an unmanageable risk to the successful delivery of the animal nutrient manufacturing plant. ERAS ECO has been obliged to locate the manufacturing plant elsewhere.

It is now proposed, at some time in the future, to install an expired liquid and solid food stuff depackaging plant in the former sludge drying building as part of the pre-treatment of waste for anaerobic digestion. The sources of the food stuff will be large retail outlets including supermarket chains. In accordance with Condition 1.9 of the current licence approval will be obtained from the Department of Agriculture, Food and the Marine to pre-treat the expired food stuff prior to the commissioning of the depackaging plant.

A new carbon filter odour control system will be installed in the former sludge drying building to replace the decommissioned unit. The system will be designed to meet the odour emission limit value set in the current licence for Emission Point A2 specified in Schedule B.1.2. Approval is sought to include the provision of the new odour control unit as a Specified Engineering Works.

12.2 Biogas Upgrader

Although the current licence facilitates the export of biogas to the national grid for the avoidance of doubt an amendment is sought to Schedule D to list the installation of a biogas upgrader i.e. a system

to reduce the carbon dioxide levels to meet Gas Network Ireland's quality requirements as a Specified Engineering Works.

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