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Mr. Denis Mullally

On behalf of Ormonde Organics Limited

12th April 2022

Reg. No.: W0287-02

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Ormonde Organics Limited for an installation located at Ormonde Organics Limited (Portlaw), Killowen, Portlaw, Waterford, X91Y9VW

Dear Sir or Madam,

I refer to the application for a licence, received by the EPA on 30 June 2021.

Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with the above mentioned legislation. You are therefore requested, in accordance with the regulations, to supply the information detailed below.

1. In relation to air emissions, please clarify what air emission points are still active at the installation. Air emission points AEP-1 and AEP-2 (both CHP), and AEP-5, AEP-7, AEP-8, and AEP-9 (biofilters) have been identified as relevant air emission points in Attachment 7.4.1 – Emissions to Atmosphere. However, AEP-3 (CHP), AEP-4 (Flare) and AEP-6 (biofilter), which are authorised air emission points in the existing licence, are not mentioned in in Attachment 7.4.1 – Emissions to Atmosphere. [Regulation 9(2)(j)].
2. In relation to the proposed new odour abatement unit being installed, please provide more details on this system, including the applicable technology, proposed emissions from it, a map showing its location, and information regarding the associated air emission points; including their Emission Point Codes, Emission Point Grid References, measures to reduce /minimise / prevent emissions (list techniques), the source of waste gases, the minimum height above ground, and the reference conditions for monitoring. Regulation 9(2)(j)].
3. The applicant is required to submit an up-to-date air dispersion model that assesses the impact of emissions from all emission points, including those identified in Attachment

7.4.1 – Emissions to Atmosphere, and any other relevant air emission points from the site. When carrying out dispersion modelling, regard should be had to the EPA "Air Dispersion Modelling from Industrial installations Guidance Note (AG4)". [Regulation 9(2)(k)].

4. In relation to Best Available Technology (BAT), further consideration is required regarding the Commission Implementing Decision 2018/1147 of 10 August 2018, which established best available techniques (BAT) conclusions for waste treatment. It is noted that some consideration was given to BAT 33 – BAT 39, as identified in the Industrial Emissions Licence Application Form, however more details are required, e.g. for BAT 34, confirm what techniques are in place at the installation, and also if the specified BAT AEL's in Table 6.7 can be met. Furthermore, you are also requested to provide a BAT assessment of the Overall Environmental Performance (BAT 1 – BAT 24). [Regulation 9(2)(h)].
5. In relation to Noise monitoring, the applicant has proposed monitoring at two noise sensitive locations. Please provide a recent noise monitoring report, which includes grid references of the noise monitoring points, and a map showing these locations in relation to the installation. [Regulation 9(2)(j)].
6. In relation to your request to change the 3% reference oxygen in Condition 4.2 of your existing licence to 15% oxygen, you refer to Part 2 of Annex V of the Industrial Emissions Directive to support this request. Please note that this Annex is only applicable to Large Combustion Plants (LCP) with a thermal input >50 MW, as set out in the scope of Article 28 of Chapter III of the IE Directive, and so is not relevant to your installation. Please provide additional relevant information to support your request to change the reference oxygen value. [Regulation 9(2)(j)].
7. In relation to groundwater monitoring, it is noted that the off-site groundwater monitoring well has been lost. Please provide a map showing the locations of the remaining wells, and confirm if there are plans to drill a new off-site well, to replace the lost well. [Regulation 9(2)(j)].
8. The following sections of the application form and attachments have been filled out incorrectly, or were left blank:
 - a. Application Form for an Industrial Emissions Licence. In relation to Waste Capacity, please confirm the exact waste capacity of the installation, and also the maximum quantity of waste to be accepted. Please refer to Section 4.3 Waste Activities of the Licence Application Form Guidance, Version 2.1.
 - b. Attachment 4.3.1 - Capacity Calculations, no explanation has been given as to how the waste, non-waste, and capacity figures provided were calculated. Please

- provide an explanation.
- c. Attachment 4.6.2 - Raw Materials. Please fill this out correctly, and resubmit.
 - d. Attachment 7.2 - Emissions to Surface Water. This part of the application form collects data on wastewater emissions to surface water. The applicant has given details on discharges to storm water instead. Please confirm if there are any process emissions to water, and provide recent laboratory results of the emissions.
 - e. Attachment 9.1 - Environmental Management Techniques. The Energy Efficiency questions in 9.3. Environmental Management System (EMS) were not answered. Please provide details.
 - f. Attachment 2.5 Technical Knowledge. Details of the applicant's technical knowledge and/or qualifications, along with that of other relevant employees were not included. Please provide details.
 - g. Attachment 4.3 Waste Acceptance Procedure. The Waste Acceptance Procedure was not included. Please provide this procedure.
 - h. Attachment 8.1 - Waste Generated and Animal By-Products Generated. No details were provided. This table is for waste generated as a result of the licensable and associated activities. This is not a table for waste accepted at the installation. Please complete this attachment, and resubmit. [Regulations 9(2) (f and g)].

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIAR where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

The requested information should be submitted to the Agency within 10 weeks of the date of this notice, in order to allow the Agency to process and determine your application.

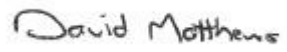
It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries, please contact licensing@epa.ie.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at [IE Licence application guidance | Environmental Protection Agency \(epa.ie\)](#)

Please direct any queries to licensing@epa.ie.

Yours faithfully,

A handwritten signature in black ink that reads "David Matthews". The signature is written in a cursive, slightly slanted style.

Dr. David Matthews
Senior inspector
Environmental Licensing Programme
Office of Environmental Sustainability
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