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Mr. Mark Heffernan

On behalf of Dublin Waste to Energy Limited

06/07/2022

Reg. No.: W0232-02

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Dublin Waste to Energy Limited for an installation located at Dublin Waste to Energy Limited, Pigeon House Road, Poolbeg Peninsula, Dublin 4, Dublin, D04N2P2

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 27 June 2019.

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.

#### **Surface water**

1. Complete Section 7.2 Emissions to Surface Water Attachment of the EPA licence application form.
2. According to section 4.6 of the application form DWtE propose to abstract surface water for use at the installation, however in attachment 4.6.1 Water and Energy Usage, no details are provided as to the current or future usage of surface water abstraction (m<sup>3</sup>/year). Please provide current and future usage of surface water abstraction (m<sup>3</sup>/year).

#### **Air emissions**

3. Complete Section 7.4.2 Emissions to Atmosphere – Minor and Potential Emissions Attachment of the EPA licence application form.
4. Provide a simple or detailed odour assessment to confirm the impact of odour emissions.
5. Air dispersion model:

- a. Provide the model input source data, actual emission rate (g/s), actual temperature, stack height, stack co-ordinates, actual volume flow (m<sup>3</sup>/s) and exit (Efflux) velocity (m/s).
  - b. Rerun the air dispersion model to include five years of met data in line with the EPA Air Dispersion Modelling Guidance Note (AG4) 2020 (AG4).
  - c. Provide the model results in graphical format and isopleths.
  - d. Provide model input building data – building elevations, heights, layout and nearby buildings greater than 40% of stack height.
  - e. Provide an assessment of the highest predicted environmental concentration based on 75% flow rate in line with AG4.
  - f. Provide a cumulative assessment of the impact of industrial installations/waste facilities emissions sources in the region.
  - g. Provide an assessment of the impact of emissions during abnormal operations compared to air quality standards.
  - h. Confirm whether fumigation was accounted for in the air dispersion modelling and if not rerun the model to take account of fumigation.
6. Confirm the location of the weather monitoring station agreed with OEE under Condition 3.2 of the current licence W0232-01.
  7. Attachment 7.4.1 Emissions to Atmosphere – Main and Fugitive Emissions Attachment
    - a. In the waste gas emissions table, it is proposed to reduce the monitoring frequency of antimony (as Sb), arsenic (as As), lead (as Pb), chromium (as Cr), cobalt (as Co), copper (as Cu), manganese (as Mn), nickel (as Ni), and vanadium (as V) and their compounds from quarterly to once every six months. Please provide justification for the proposed reduction in monitoring frequency, including monitoring data to support this proposal.
    - b. Confirm whether the SNCR is operated on urea, if yes provide the proposed monitoring frequency of nitrous oxide (N<sub>2</sub>O) and the proposed monitoring and analysis method to monitor channelled emissions to air. Include monitoring data in support of the response.
    - c. It is noted that in Revised Attachment 4.7.2 Waste Incineration BAT of the application form that DWtE proposes that it is not required to monitor for ammonia in the flue gases. However, in attachment 7.4.1 Emissions to Atmosphere it is proposed that the monitoring frequency for ammonia be continuous. Please confirm whether a derogation under Section 86A(6) of the EPA Act 1992 as amended is being sought and the specific reasons for such derogation. I refer you to the EPA (2016), *Draft Guidance on Article 15 of Industrial Emissions Directive (2010/75/EU)* for your reference ([Licensing & Permitting: Industrial Emission Licensing \(IED\) Publications | Environmental Protection Agency \(epa.ie\)](#)).
  8. Attachment 4.7.2 Waste Incineration BAT of the application form

- a. It is noted that it is proposed to measure mercury (Hg) quarterly at the installation and within the minimum period set out in footnote (5) to BAT 4 in the WI CID. Please provide evidence including monitoring data to demonstrate that the wastes incinerated at the installation have a low and stable mercury content.
- b. Provide evidence, where available that emissions of dioxin-like PCBs emission levels are proven to be sufficiently stable in line with BAT 30 of the WI CID and that the channelled emissions of dioxin-like PCBs are proven to be less than 0.01 ng WHO-IEQ/Nm<sup>3</sup> in line with BAT 4 and therefore monitoring of dioxin-like PCBs does not apply.

### **Waste**

1. Confirm whether there will be an increase in incinerator bottom ash, boiler ash and air pollution control residues.
2. Provide details on the existing abatement and its capacity to handle the proposed increase in waste to be accepted at the installation. Confirm that there is sufficient storage at the installation for the raw materials, intermediates and products used or generated on the site and waste.
3. Provide details on what are the main waste sources, including list of waste codes to be increased and accepted (municipal and commercial & industrial waste) at the installation. It is noted that it is proposed to increase the commercial and industrial waste from 100,000 tonnes per annum (tpa) to 150,000 tpa. Is it proposed to increase the municipal waste from 500,000 tpa to 540,000 tpa (with the maximum annual quantity to be accepted to not need exceed 690,000 tpa)?

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 six 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](mailto: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](mailto:licensing@epa.ie).

Yours faithfully,

A handwritten signature in cursive script that reads "Jennifer Cope".

Environmental Licensing Programme  
Office of Environmental Sustainability  
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