

# **EPA Application Form**

# 7.4.1 - Emissions to Atmosphere - Main and Fugitive Emissions - Attachment

**Organisation Name:**\*

Indaver Ireland Limited

Application I.D.: \*

LA010332

# 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



#### **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	Emission Point Grid Ref.		Typical Davs	Measures to reduce /minimise / prevent emissions (list techniques) <sup>1</sup>	Source of Waste	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>	Gases <sup>2</sup>	Height Above Ground (m)	Pressure <sup>5</sup>	Temp. 6	% Oxygen Mois	Moisture <sup>8</sup>	
A1-1	306332 (ING) / 706260 (ITM)	270967 ING) / 770982 (ITM)	333	Flue gas from the incinerator is treated using the following: - Injection of ammonia solution into the boiler (reduce NO <sub>x</sub> levels) also known as Selective Non-Catalytic Reduction (SNCR)	Incineration	65	101.325	273.15	11	Dry	

<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 <u>or</u> 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 <u>or</u> Dry.



Emission	Emission Point Grid Ref.		Typical Days	Measures to reduce /minimise / prevent emissions (list techniques) <sup>1</sup>	Source of Waste	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>	Gases <sup>2</sup>	Height Above Ground (m)	Pressure <sup>5</sup>	Temp. 6	% Oxygen 7	Moisture <sup>8</sup>		
				- Lime (for acid concentration correction)								
				<ul> <li>Activated carbon/clay mixture (for removal of dioxins and furans, particulates and heavy metals)</li> </ul>								
				- Baghouse filter (mechanical removal of particulates).								

#### 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)
A1-1	Waste	Other (Gas Oil)	N/A	Indaver Carranstown Waste to Energy Plant

<sup>&</sup>lt;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)
N/A	N/A	N/A	N/A	N/A

<sup>&</sup>lt;sup>11</sup> 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.

<sup>&</sup>lt;sup>12</sup> 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 Doint Code	Monitoring Doint Code <sup>13</sup>	Monitoring Point Grid Reference					
Emission Point Code	Monitoring Point Code	Easting <sup>14</sup>	Northing <sup>15</sup>				
A1-1	A1-1	306332 (ING) / 706260 (ITM)	270967 ING) / 770982 (ITM)				

<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 Note 1

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

Emission Point Code: A1-1

Control <sup>16</sup> parameter	Monitoring to be carried out <sup>17</sup>	Additional notes (where relevant)
	Monitoring of Incinerator Note 2	1
Combustion	Combustion chamber temperature Note 3	Thermocouple
Exhaust gas	% O <sub>2</sub> in exhaust gas	O <sub>2</sub> analyser
Exhaust gas	Exhaust gas temperature	Thermocouple
Exhaust gas	Exhaust gas pressure	Pressure monitor
Exhaust gas	Water vapour content Note 4	Standard method
Furnace pressure	Pressure in the furnace	Pressure monitors
Waste input	Feed rate	Low level detector and visual
Hydrocarbon	Hydrocarbon levels	LEL Detector
Burnout of waste in the furnace	CCTV monitoring of flame	CCTV Camera
	Monitoring of Boiler	·

<sup>&</sup>lt;sup>16</sup> List the operating parameters of the treatment/abatement system which control its function.

<sup>&</sup>lt;sup>17</sup> List the monitoring of the control parameter to be carried out.

*Note 1: Or other monitoring equipment agreed in advance by the Agency* 

Note 2: The licensee shall maintain appropriate access to standby and / or spaces to ensure the operation of the system

Note 3: Near the inner wall of the combustion chamber (or other representative location agreed by the Agency)

Note 4: Not necessary if gases are dried prior to analysis.



Control <sup>16</sup> parameter	Monitoring to be carried out <sup>17</sup>	Additional notes (where relevant)								
Flue gas	Pressure	Pressure sensors								
Flue gas	Temperature	Thermocouple								
NOx	Concentration and Reagent	NO <sub>x</sub> Analyser and Reagent dosage rate								
Feed water supply	Water rate and water level	Flow meter and level								
	Monitoring of Energy Recovery									
Energy Recovery	Steam Flow, Condenser Control, Turbine Control	Flow meter, temperature, pressure analysers								
Flue gas cleaning										
Flue gas temperature	Thermocouple									
Flue gas pressure	Pressure transmitters									
Expanded clay dosing	Dosage rate meter and dosing bin weight	First Stage dioxin/furan and heavy metals removal in								
Expanded clay silo	Low level alarm	flue gas duct								
HCL and SO₂ concentration	Inline flue gas analyser	Inlet to Spray Drier Absorber								
Lime dosage rate	Flow meter	Lime Milly propagation and delivery to Datary stomicar								
Lime slurry buffer tank	Low level alarm	Line wink preparation and delivery to kotary atomiser								
Rotary atomiser	Weekly cleaning	Spray Drier Absorber								
Outlet temperature	Thermocouple	Outlet of Spray Drier Absorber								
Activated Carbon dosing	Dosage rate meter and dosing bin weight									
Hydrated lime dosing	Dosage rate meter	Second stage dioxin/furan and heavy metal removal in								
Activated carbon and hydrated lime supply silos	Low level alarms on both silos	LAB Loop								



Control <sup>16</sup> parameter	Monitoring to be carried out <sup>17</sup>	Additional notes (where relevant)			
Pressure differential across LAB Loop	Pressure sensors on either side of loop				
Pressure differential across filters	Differential pressure indicator				
Temperature of discharge hopper	Thermocouple	Baghouse Filter			
Discharge hopper	High level alarm				
Re-circulated flue gas cleaning residues supply hopper	Low and high level alarms	Reagent recirculation			
Maturation time in silo	Flow meters at inlet and outlet	Maturation silo			
Flue gas pressure	Pressure sensors at inlet	ID Fan			
	Residues				
Silo Capacity	High level alarms	Deiler ash and flue gas algoning residue siles			
Silo emissions to Air	HEPA Filter Integrity	Boller ash and fue gas cleaning residue silos			
Boiler Ash & Flue Gas Cleaning Residues	Quantity & Type of ash	Load cells on silos & Weighbridge weights on residues exported from site.			
Water, boiler ash and flue gas cleaning residue addition to pre-treatment process	Quantity & Types	Load cells on dosing vessels to control the process. Weighbridge weights recorded for pre-treated residues sent off site.			



## Waste Gas Emissions

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

			Proposed Emission Limits 18							Sampling / Monitoring			
Emission						-	-		BAT Associated	EPA Guidance for	r Monitoring - AG2 Index of	Preferred Methods	
Point Code	Parameter	Point Code	Max. Hourly <sup>19</sup>	Max. Daily <sup>20</sup>	Average Daily <sup>21</sup>	Average Month <sup>22</sup>	Average Annual <sup>23</sup>	How was the Proposed Emission Limit Derived?	s the Emission Range sed (if applicable) Limit ed?	Proposed Monitoring Frequency	Proposed Monitoring and Analysis Method <sup>24</sup>	Compliant with BAT Monitoring Requirement?	
A1-1	Flow rate	A1-1	250,000 Nm <sup>3</sup> /h <i>Note</i> 1	-	200,000 Nm <sup>3</sup> /h <i>Note 2</i>	-	-	N/A	N/A	Continuous	EN ISO 16911-1:2013	Yes	
A1-1	Total Dust	A1-1	30 mg/Nm <sup>3</sup> Note 3	10 mg/Nm <sup>3</sup> Note 4	10 mg/Nm <sup>3</sup>	-	-	IE Licence W0167-03 & IE Directive (2010/75/EU)	2 - 5mg/Nm <sup>3</sup> Note 5 5mg/Nm <sup>3</sup> Note 6	Continuous	lso-kinetic / gravimetric or as otherwise agreed with the Agency	Yes	

<sup>18</sup> 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 www.epa.ie.

- <sup>19</sup> Specify the proposed limit <u>and the units.</u>
- <sup>20</sup> Specify the proposed limit <u>and the units.</u>
- <sup>21</sup> Specify the proposed limit <u>and the units.</u>
- <sup>22</sup> Specify the proposed limit <u>and the units.</u>
- <sup>23</sup> Specify the proposed limit <u>and the units.</u>
- <sup>24</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</u> <u>Methods'</u>.
- Note 1: Max 30-minute flow rate
- Note 2: Max daily average flow rate
- Note 3: Half-hourly averages for all samples, OR

**Note 5**: BAT-AELs range based on WI BAT Conclusions Document June 2019

*Note 4*: Half hourly average for 97% of sample

**Note 6**: BAT-AEL for Normal Operating Conditions (NOC)



					Proposed	Emission L	imits 18					
Emission									BAT Associated	EPA Guidance for	Monitoring - AG2 Index of	Preferred Methods
Point Code	Parameter	Monitoring Point Code	Max. Hourly <sup>19</sup>	Max. Daily <sup>20</sup>	Average Daily <sup>21</sup>	Average Month <sup>22</sup>	Average Annual <sup>23</sup>	How was the Proposed Emission Limit Derived?	Emission Range (if applicable)	Proposed Monitoring Frequency	Proposed Monitoring and Analysis Method <sup>24</sup>	Compliant with BAT Monitoring Requirement?
A1-1	Gaseous and vaporous organic substances, expressed as total organic carbon	A1-1	20 mg/Nm <sup>3</sup> <sub>Note 3</sub>	10 mg/Nm <sup>3</sup> Note 4	10 mg/Nm <sup>3</sup>	-	-	IE Licence W0167-03 & IE Directive (2010/75/EU)	<3 - 10 mg/Nm <sup>3</sup> Note 5 10 mg/Nm <sup>3</sup> Note 6	Continuous	Flame Ionisation Detector or as otherwise agreed with the Agency	Yes
A1-1	Hydrogen chloride (HCl)	A1-1	60 mg/Nm <sup>3</sup> Note 3	10 mg/Nm <sup>3</sup> Note 4	10 mg/Nm <sup>3</sup>	-	-	IE Licence W0167-03 & IE Directive (2010/75/EU)	<2 - 8 mg/Nm <sup>3</sup> Note 5 8 mg/Nm <sup>3</sup> Note 6	Continuous	Infra-red analyser or as otherwise agreed with the Agency	Yes
A1-1	Hydrogen fluoride (HF)	A1-1	4 mg/Nm <sup>3</sup> Note 3	2 mg/Nm <sup>3</sup> Note 4	1 mg/Nm <sup>3</sup>	-	-	IE Licence W0167-03 & IE Directive (2010/75/EU)	<1 mg/Nm <sup>3</sup> Note 5	Biannual measurement, sample period of a minimum of 30 minutes and a maximum of 8 hours	IC (Ion chromatography) or as otherwise agreed with the Agency	Yes
A1-1	Sulphur dioxide (SO2)	A1-1	200 mg/Nm <sup>3</sup> Note 3	50 mg/Nm <sup>3</sup> Note 4	50 mg/Nm <sup>3</sup>	-	-	IE Licence W0167-03 & IE Directive (2010/75/EU)	5-40 mg/Nm <sup>3</sup> Note 5 40 mg/Nm <sup>3</sup> Note 6	Continuous	Infra-red analyser or as otherwise agreed with the Agency	Yes
A1-1	Oxides of nitrogen (NO and NO2, expressed as NO2)	A1-1	400 mg/Nm <sup>3</sup> Note 3	200 mg/Nm <sup>3</sup> <sub>Note 4</sub>	200 mg/Nm <sup>3</sup>	-	-	IE Licence W0167-03 & IE Directive (2010/75/EU)	50-150 mg/Nm <sup>3</sup> Note 5 180 mg/Nm <sup>3</sup> Note 9	Continuous	Infra-red analyser or as otherwise agreed with the Agency	Yes
A1-1	Cadmium (Cd) and Thallium (Tl) and their compounds	A1-1	-	-	-	-	0.05 mg/Nm <sup>3</sup>	IE Licence W0167-03 & IE Directive (2010/75/EU)	0.005 - 0.02 mg/Nm <sup>3</sup> <i>Note 5</i> 0.02 mg/Nm <sup>3</sup> <i>Note 6</i>	Biannual measurement, sample period of a minimum of 30 minutes and a	ICP-MS (Inductively coupled plasma mass spectrometry / as otherwise agreed with the Agency)	Yes



					Proposed	Emission L	imits 18					
Emission									BAT Associated	EPA Guidance for	<u>r Monitoring - AG2 Index of</u>	Preferred Methods
Point Code	Parameter	Monitoring Point Code	Max. Hourly <sup>19</sup>	Max. Daily <sup>20</sup>	Average Daily <sup>21</sup>	Average Month <sup>22</sup>	Average Annual <sup>23</sup>	How was the Proposed Emission Limit Derived?	Emission Range (if applicable)	Proposed Monitoring Frequency	Proposed Monitoring and Analysis Method <sup>24</sup>	Compliant with BAT Monitoring Requirement?
										maximum of 8 hours		
A1-1	Mercury (Hg) and its compounds	A1-1	-	-	-	-	0.05 mg/Nm <sup>3</sup>	IE Licence W0167-03 & IE Directive (2010/75/EU)	BAT AEL's for an existing plant, during Normal Operating Conditions, demonstrated stable & low (as per correspondence with the Agency on BREF- Mercury Monitoring Proposal dated 29 <sup>th</sup> July 2022). 0.005 – 0.02 mg/Nm <sup>3</sup> Note 5 0.02 mg/Nm <sup>3</sup> Note 6	Biannual measurement, sample period of a minimum of 30 minutes and a maximum of 8 hours	CV-AFS (Atomic fluorescence spectrometry) / as otherwise agreed with the Agency	Yes
A1-1	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	A1-1	-	-	-	-	0.5 mg/Nm <sup>3</sup>	IE Licence W0167-03 & IE Directive (2010/75/EU)	0.01 - 0.3 mg/Nm <sup>3</sup> <i>Note 5</i> 0.3 mg/m <sup>3</sup> <i>Note 6</i>	Biannual measurement, sample period of a minimum of 30 minutes and a maximum of 8 hours	ICP-MS (Inductively coupled plasma mass spectrometry) / as otherwise agreed with the Agency	Yes



Emission Point Code	Parameter	Monitoring Point Code	Proposed Emission Limits <sup>18</sup>							Sampling / Monitoring		
									BAT Associated	EPA Guidance for Monitoring - AG2 Index of Preferred Methods		
			Max. Hourly <sup>19</sup>	Max. Daily <sup>20</sup>	Average Daily <sup>21</sup>	Average Month <sup>22</sup>	Average Annual <sup>23</sup>	How was the Proposed Emission Limit Derived?	Emission Range (if applicable)	Proposed Monitoring Frequency	Proposed Monitoring and Analysis Method <sup>24</sup>	Compliant with BAT Monitoring Requirement?
	V) and their compounds											
A1-1	Dioxins / furans (TEQ)	A1-1	-	-	-	-	0.1 ng/Nm <sup>3</sup>	IE Licence W0167-03 & IE Directive (2010/75/EU)	<0.01 – 0.06 ng I-TEQ/Nm <sup>3</sup> <i>Note 5</i> 0.06 ng I- TEQ/Nm <sup>3</sup> <i>Note 6</i> <0.01 – 0.08 ng I-TEQ/Nm <sup>3</sup> <i>Note 5</i> 0.06 ng I- TEQ/Nm <sup>3</sup> <i>Note 6</i>	Biannual measurement, average value over sample period of between 6 and 8 hours. Continuous sampling with analysis every two weeks for duration of test programme.	Other measurements as per CEN method (EN 1948, parts 1,2, and 3) or as otherwise agreed with the Agency Continuous sampling method as per application.	Yes
A1-1	Ammonia (NH₃)	A1-1	-	-	-	-	-	-	2 – 10 mg/ Nm <sup>3</sup> Note 5 15 mg/Nm <sup>3</sup> Note 10	Continuous	Infra-red analyser, Generic EN standards or as agreed with the Agency	Yes
A1-1	Carbon Monoxide (CO)	A1-1	150 mg/Nm <sup>3</sup> (10 min average) <i>Note 7</i>	100 mg/Nm <sup>3</sup> (30 min average) <i>Note 7</i>	50 mg/Nm <sup>3</sup> <i>Note 8</i>	-	-	IE Licence W0167-03 & IE Directive (2010/75/EU)	10 – 50 mg/Nm <sup>3</sup> Note 5 50 mg/Nm <sup>3</sup> Note 6	Continuous	Infra-red analyser or as agreed with the Agency	Yes

\* 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 \*add rows to the table as necessary

Note 7: At least 95% of all 10-minute values taken in any 24-hour period shall not exceed 150 mg/m3 or all the half-hourly average values taken in the same period shall not exceed 100 mg/m3.



**Note 8**: At least 97% of the daily average values over the year shall not exceed the emission limit value. **Note 9**: BAT AEL for existing plants with SNCR systems installed **Note 10**: BAT AEL for existing plants fitted with SNCR and without wet abatement systems installed



# Minor and/or Potential Emissions to Atmosphere<sup>25</sup>

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

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

Emissions to Atmosphere - Minor - Potential Emissions file name:

Attachment 7-4-2 Emissions to Air Minor Potential

<sup>&</sup>lt;sup>25</sup> Refer to page 3 for guidance on what constitutes a minor or potential emission.



## **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>26</sup> (Yes/No) \*

Yes

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	Dust being emitted from ash hall, tipping hall, boiler ash and flue gas residue loading areas and the pre- treatment plant.	Dust levels will be compliant with ambient air quality levels at all locations beyond the site boundary.	mg/m²/day	Dust deposition
VOC <sup>27</sup>	No	N/A	N/A	%	of solvent input
Ammonia	Yes	Ammonia release from big bags of pre-treated flue gas residue and boiler ash in the pre-treatment plant.	N/A	ug/m³	at the nearest European Site
Odour	Yes	The two potential sources of odour are from the tipping hall and bunker area and from incoming and outgoing waste trucks.	Trace	Odour Units	at boundary of installation

<sup>&</sup>lt;sup>26</sup> For waste activities, dust and odour emissions should be considered and described in the table below where applicable.

<sup>&</sup>lt;sup>27</sup> In relation to activities listed in Chapter V (for installations using Organic Solvents) of the Industrial Emissions Directive (2010/75/EU):

<sup>-</sup> specify how the requirements in relation to fugitive emissions will be met.



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

In accordance with IEL W0167-03, Indaver have implemented a fugitive emission and odour management plans which identify, monitor and reduce fugitive emissions from the site.

In relation to potential dust emissions there is a risk of dust being emitted from ash hall, tipping hall, boiler ash and flue gas residue loading areas and the pretreatment plant. Mitigation measures in place include the following:

- Negative pressure.
- Doors to tipping hall, bottom ash hall and exit points closed where possible.
- Good Housekeeping and Good Working Practice.
- Regular dust checks are carried out as part of the infrastructure checks in addition to internal audits.
- Wet scrubber in Pre-treatment Plant.
- Covered waste trucks.
- Paved/hard standing where appropriate.

Fugitive gaseous emissions, in the form of hydrogen and ammonia, can be emitted from big bags of pre-treated flue gas residue and boiler ash in the pre-treatment plant or from deslaggers in bottom ash hall. Control measures, which are in place, include extraction units in the bagging area and over the deslaggers and the use of hydrogen gas handheld monitors, which are passed over each bag to monitor the amount of hydrogen gas being released.

As previously mentioned the two main potential sources of odour arise from the tipping hall and the movement of waste trucks on site. to control odours a combination of minimisation, containment and treatment techniques and operational procedures are in place and include the following:

- Negative pressure in the bunker prevents odour from escaping.
- Doors to tipping hall and exit points closed where possible.
- Spraying of odour-masking or neutralising chemicals at the tipping hall door where appropriate.
- Good Housekeeping and Good Working Practice.
- Regular odour checks are carried out as part of the infrastructure checks in addition to internal audits.
- Air flow through the tipping hall and bunker area was improved though the installation of additional smoke vents.

epa

#### Authorisation Application Form

Note i Complete the table for each emission point having regard to the guidance 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 emission points 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.

#### Note ii 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 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.