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On behalf of Milltown Composting Systems Ltd

05/09/2024

Reg. No.: W0270-03

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Milltown Composting Systems Ltd for an installation located at Milltown Composting Systems Limited, Miltownmore, Fethard, County Tipperary, Tipperary, E91X8E8

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 03 March 2023.

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.

REGULATION 9 COMPLIANCE REQUIREMENTS

1. Odour Dispersion model [Regulation 9(2)(k)]

- (a) It is noted that Section 7.4.1 of the application form proposes an emission limit value of 750 OuE/m³ for odour concentration for the three biofilters (emissions points: A2-1, A2-2 and A2-3). However, the odour dispersion model received by the Agency on 5 October 2023 used an odour concentration of 350 OuE/m³ for the biofilters. Confirm that an emission limit value of 350 OuE/m³ is proposed for odour concentration for the three biofilters. The licensee is required to submit an up-to-date odour dispersion model that assesses the impact of odour emission from the installation if the proposal is to have an emission limit value of 750 OuE/m³ for odour concentration for the biofilters.
- (b) The current licence W0270-02 specifies a maximum volumetric flow of 41,884 m³/hr and 80,865 m³/hr for emission points A2-1 and A2-2 respectively. The odour dispersion model submitted to the Agency on 05 October 2023 used maximum volumetric flows of 31,884 m³/hr, 70,865 m³/hr and 71,600 m³/hr for emission points A2-1, A2-2 and A2-3 respectively. Attachment 4 of the response submitted on 12 July 2023 to the EPA's Regulation 10(2)(b)(ii)

request for further information issued on 21 May 2023 refers to a maximum volumetric flow rate of 81,600 m³/hr for A2-3. Clarify the maximum rate per hour (Nm³/hr) of volumetric flow to be emitted from emissions points: A2-1, A2-2 and A2-3. The licensee is required to submit an up-to-date odour dispersion model to include the proposed maximum volumetric flows (Nm³/hr) if it not the same as the maximum volumetric flow rates used in the odour dispersion model submitted on 5 October 2023.

- (c) Submit an up-to-date odour dispersion model to include a cumulative assessment of the impact of industrial installations/waste facilities emissions sources in the region or justify why a cumulative assessment is not required.
- (d) Clarify whether emissions points A2-1, A2-2 and A2-3 have appropriate access for monitoring.
- 2. The applicant has outlined that in-vessel composting is to be undertaken on-site.

 - (a) Provide further details regarding which list of waste (LoW) codes will serve as inputs to the in-vessel composting [Regulation 9(2)(g)],
 - (b) Provide details of the intended LoW codes for outputs from the in- vessel composting excluding the compost product. [Regulation 9(2)(t)].
- 3. Provide details on what are the main waste sources, including list of waste codes to be accepted at the installation. [Regulation 9(2)(t)]
- 4. Waste processing [Regulation 9(2)(g)]

 - (a) Clarify what is meant by the term ‘process overs’.
 - (b) Provide details on how waste accepted to make compost product is segregated from the waste accepted to make bio-stabilised waste.
 - (c) Provide further details regarding the storage facilities for the compost product to ensure the compost product remains segregated from waste awaiting collection.
 - (d) Provide details on the source of the oversize plastics and how the oversize plastics are processed/sent off-site for recovery or disposal.

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 *eight 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 Sincerely,

Jennifer Cope

Circular Economy Programme

Office of Environmental Sustainability

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