Site Visit Report

The site visit process is a sample on a particular day of an installation's compliance with some of its licence conditions. Where non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

Instructions and actions arising from the visit shall be addressed, or where applicable noted, by the licensee in order to ensure compliance, to improve the environmental performance of the installation and to provide clarification on certain issues.

The licensee shall take the actions specified to close out the non-compliances and observations raised in this Site Visit Report.

Licensee

Name of Installation	Dublin Waste to Energy
Licensee	Dublin Waste to Energy Limited
Licence Register No.	W0232-01
CRO Number	399060
Site Address	Pigeon House Road, Poolbeg Peninsula, Dublin 4, Dublin
Site Visit Reference No.	SV13864

Report Detail

Issue Date	15/01/2018
Prepared By	Victor Olmos

Site Visit Detail

Date Of Inspection	14/12/2017	**Announced**		No	
Time In	12:07	**Time Out**		13:55	
Agency Personnel On Site	Victor Olmos				
Licensee Personnel and Role	Mark Heffernan, Environmental Manager Darragh English, INE Technician Rhodri Jones, SICK Project Manager Chick Davis (via phone), Continuous Emission Monitoring System (CEMS) Coordinator				
Photo Taken	No	**Samples Taken**	No	**Video Taken**	No
Odour Assessment	No				

Scope

The purpose of the visit was to discuss a number of technical aspects concerning the Continuous Emission Monitoring System (CEMS) software settings and its compliance with relevant monitoring standards. The purpose of this report is to present the findings of the visit.

Media

The following media was inspected during the visit:

- Air.

Site Areas Inspected

The meeting took place in a meeting room on the Dublin Waste to Energy site and no site areas were inspected during the meeting.

Documents Inspected

No documents were inspected during the visit.

1. Site Specific Issues

		Answer	Condition Number	Non Compliance	Observation
1.1	CEMS software settings	Checked	6.6		No

Comment / Corrective Action

The following observations concerning the Continuous Emission Monitoring Systems (CEMS) were raised during the site visit:

1. There are 2 sets of software involved in the results calculations: The MCSFT (software integrated in the analyser) carries out the conversion from the spectra analysis to mg/m3 units and carries out temperature, pressure and moisture corrections. The external MEAC software carries out the QAL2 calibration function implementation, oxygen corrections and uncertainty subtraction at confidence intervals.
2. It would be technically possible to carry out all corrections and calculations by the MEAC software. This option is not feasible according to the licensee as it would require a complete re-setup of the system configuration.
3. The moisture values used for moisture corrections in the MCSFT do not have the QAL2 calibration function integrated. It would be possible to add a correction factor to this parameter to integrate the QAL2 function.
4. The QAL1 certificate for the SICK FTIR does not cover the software calculations
5. The analogue panel in the CEMS hut can be used to datalog results in the range of 4-20 mA (equivalent to mg/Nm3 in dry basis)

		Answer	Condition Number	Non Compliance	Observation
1.2	Results calculation sequence	Checked	6.6		Yes

Comment / Corrective Action

The correct sequence of calculations by the MEAC software was discussed during the visit. Further information is required to assess the correct methodology.

Corrective actions required:

The licensee shall submit updated flow charts with the right sequence of calculation steps taken at each software set. These charts will reflect the calculation sequence for the parameters measured by the FTIR, the FID and also the volumetric flow measuring instrument.

		Answer	Condition Number	Non Compliance	Observation
1.3	EN 14181 compliance	Checked	6.7		Yes

Comment / Corrective Action

The following issues were discussed in relation to EN 14181 Standard compliance:

1. According to the current configuration described in Question 1.1, the raw data provided for AST/QAL2 events is already corrected for temperature, pressure and moisture.
2. The redundant unit acts as a CEMS back up system for both incineration lines (one analyser, 2 sampling lines). During the revision of the latest QAL2 report it was noticed that the redundant unit was only included in the EN14181 mandatory tests for the sampling line from Emission Point Reference no. A2-1, and not for Emission Point Reference no. A2-2

Corrective actions required: The licensee shall:

1. Provide evidence that the MCSFT software provides raw data results in compliance with Sections 5.2 and 6.4.1 of EN 14181 standard
2. Clarify if the MCSFT and/or the MEAC software can implement 2 calibration functions on the same analyser (one per line)

Summary

Two observations were recorded concerning the continuous emissions monitoring systems were discussed during the site visit. The licensee shall address the required corrective actions in this report in order for the Agency to make a complete assessment of the submitted QAL2 reports.

The licensee is advised that all future quality assurance assessments shall be completed in accordance with the EPA guidance AG3 Air Guidance Note on the Implementation of I.S. EN 14181.

FOLLOW-UP ACTIONS

You are required to complete the instructions and actions, as outlined in this report, within the specified timeframe. Where required, you shall respond to actions specified in Compliance Investigations within the required timeframe.The licensee shall maintain documentary evidence, for review by the EPA, that the prescribed corrective actions were completed within the required timeframe.

(i) Compliance Investigations

You are not required to respond directly to items contained in this EPA site visit report; where an issue requires a direct response, the EPA will generate a Compliance Investigation through the EDEN system. You will receive notification when a Compliance Investigation instruction or action is generated.

(ii) Publication of reports and licensee response.

Please note that this Site Visit Report will be made available for public viewing via the EPA's Licence Enforcement Access Portal within one day of the issue date and will be published on the Licence Details Page of the EPA's website, www.epa.ie, that relates to your licence 60 calendar days after the issue date.

You may if you choose submit, within 45 calendar days of the issue date of this Site Visit Report, a Licensee Public Response that will be published alongside the Site Visit Report. This Response, should you wish to avail of it, provides you with an opportunity to inform the public about how you are implementing the actions set out in the report, activities underway, timescales and target completion dates. Please be aware that the content of your Licensee Public Response must be factual and should not breach the EPAs stated online publication standards.

If you wish to submit a Licensee Public Response to an EPA Site Visit Report, you should do this by clicking on the 'Make a Response' link on the Site Visits page in EDEN. A .pdf document containing your response can be attached and submitted from here.

(iii) Response to Site visit report

Where you do wish to respond directly to a site visit report, you should do this by generating a 'Licensee Return' of the type 'Site Updates/Notifications' and the sub-type 'Response to EPA Report' in EDEN.

Please note that you are required to comply with the conditions of your licence at all times, and where noncompliance occurs you must restore compliance within the shortest possible time. These actions will be verified during subsequent EPA visits.

Please quote the above Inspection Reference Number in any future correspondence in relation to this Report.