



Headquarters,
Johnstown Castle Estate,
County Wexford, Ireland

GREENHOUSE GAS EMISSIONS PERMIT

Permit Register Number: IE-GHG015-10345-4

Operator: Lakeland Dairies Co-Operative Society
Limited
Church Street
Killeshandra
Cavan
H12 V273

Installation Name: Bailieboro Foods Limited

Site Name: Bailieboro Foods Limited

Location: Lear
Bailieborough
Cavan
A82 N6K8

Ireland

Introductory Note

This introductory note does not form a part of the Greenhouse Gas Emissions Permit.

This Greenhouse Gas Emissions Permit authorises the holder to undertake named activities resulting in emissions of Carbon Dioxide from the listed emission sources. It also contains requirements that must be met in respect of such emissions, including monitoring and reporting requirements. This Greenhouse Gas Emissions Permit places an obligation on the Operator to surrender allowances to the Agency equal to the annual reportable emissions of carbon dioxide equivalent from the installation in each calendar year, no later than four months after the end of each such year.

Contact with Agency:

If you contact the Agency about this Greenhouse Gas Emissions Permit please quote the following reference: Greenhouse Gas Emissions Permit N^o IE-GHG015-10345.

All correspondence in relation to this permit should be addressed to:

Email: help.ets@epa.ie

By Post: Climate Change Unit, Environmental Protection Agency
P.O. Box 3000, Johnstown Castle Estate,
Co. Wexford

Updating of the permit:

This Greenhouse Gas Emissions Permit may be updated by the Agency, subject to compliance with Condition 2. The current Greenhouse Gas Emissions Permit will normally be available on the Agency's website at www.epa.ie and [ETSWAP](#).

Surrender of the permit:

Before this Greenhouse Gas Emissions Permit can be wholly or partially surrendered, a written application must be made to the on-line ETS portal, and written permission received from, the Agency through [ETSWAP](#).

Transfer of the permit or part of the permit:

Before this Greenhouse Gas Emissions Permit can be wholly or partially transferred to another Operator a joint written application to transfer this Greenhouse Gas Emissions Permit must be made (by both the existing and proposed Operators) to, and written permission received from, the Agency through the on-line ETS portal [ETSWAP](#).

Licence held pursuant to the Environmental Protection Agency Act 1992, as amended. (as of the date of this permit):

IPC/IE Licence Register Number
P0406-05

Status Log

Current Permit

Permit number	Date application received	Date Permit issued	Comment
IE-GHG015-10345-4	20 December 2016	22 January 2019	<p>1. Three emission sources S10, S11 and S12 (plus corresponding emissions points GE-001, CHB-003 and GE-003) were decommissioned in 2017.</p> <p>2. Five new emission sources (S16 Petrol Power Washer 0.01MW, S17 maintenance acetylene 0.07MW, S18 bunsen burners 0.01MW, S19 Admin Boiler 0.08MW, S20 Mobile Garage heater 0.04MW) plus corresponding emission points (A30, A31, A32, CHB-003, A33) were installed from 2016 to 2018.</p> <p>3. Three new de-minimis Source Streams were added: F5 Petrol, F6 Acetylene, F7 Butane.</p> <p>4. The Total Capacity has decreased from 102.51 to 100.72 MW.</p> <p>5. The installation is now Category B (MRR Article 19). Tier 3 for NCV and Emission Factor is now being achieved for Natural Gas.</p>

Previous Permits

Permit number	Change Type	Date application received	Date Permit issued	Comment
IE-GHG015-10345-1	GHG Permit Application	11 September 2013	30 October 2013	
IE-GHG015-10345-2	GHG Variation	12 February 2015	26 August 2015	<ol style="list-style-type: none"> 1. Update to IED version and inclusion of Bailieboro Foods Limited in the Licence holder title. 2. Removal of tallow (liquid biomass) as a source stream. 3. Removal of small generator from WWTP (S13) 4. Replacement of LPG with propane for start up (F4) 5. Average emissions updated (increased to 40k).
IE-GHG015-10345-3	GHG Variation	05 November 2015	15 March 2016	<ol style="list-style-type: none"> 1. Installed capacity increase from 68 to 102.5 MW. The increase is from a new gas powered CHP (S15-1) and waste heat boiler (S15-2) and two smaller dryers (S13 & S14).

End of Introductory Note

Glossary of Terms

For the purposes of this permit the terms listed in the left hand column shall have the meaning given in the right hand column below:

The Agency	Environmental Protection Agency.
Agreement	Agreement in writing.
Allowance	Permission to emit to the atmosphere one tonne of carbon dioxide equivalent during a specified period issued for the purposes of Directive 2003/87/EC by the Agency or by a designated national competent authority of a Member State of the European Union.
Annual Reportable Emissions	Reportable Emissions of carbon dioxide made in any calendar year commencing from 1 January 2005 or the year of commencement of the activity, whichever is the later.
A & V Regulation	Commission Regulation (EU) No 600/2012 of 21 June 2012 on the verification of greenhouse gas emission reports and tonne-kilometre reports and the accreditation of verifiers pursuant to Directive 2003/87/EC of the European Parliament and of the Council and any amendments or revisions thereto.
Category A Installation	As defined in Article 19.2 (a) of the M&R Regulation.
Category B Installation	As defined in Article 19.2 (b) of the M&R Regulation.
Category C Installation	As defined in Article 19.2 (c) of the M&R Regulation.
The Directive	Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.
Emissions	The release of greenhouse gases into the atmosphere from sources in an installation.
EPA	Environmental Protection Agency.
Fall-Back Methodology	As defined in Article 22 of the M&R Regulation.
GHG	Greenhouse gas.
GHG Permit	Greenhouse gas emissions permit.
Greenhouse Gas	Any of the gases in Schedule 2 of the Regulations.
IPC/IE	Integrated Pollution Control/Industrial Emissions.
Installation	Any stationary technical unit where one or more activities listed in Schedule 1 to the Regulations are carried out. Also any other directly associated activities which have a technical connection with the activities carried out on that site and which could have an effect on emissions and pollution. References to an installation include references to part of an installation.

Installation with low emissions	As defined in Article 47 of the M&R Regulation.
Major Source Streams	As defined in Article 19.3 (c) of the M&R Regulation.
M&R Regulation	Commission Regulation (EU) No 601/2012 of 21 June 2012 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council and any amendments or revisions thereto.
Mis-statement	An omission, misrepresentation or error in the Operators reported data, not considering the uncertainty permissible pursuant to Article 12(1)(a) of Regulation (EU) no 601/2012.
N/A	Not applicable.
Monitoring Plan	The Plan submitted and approved in accordance with Condition 3.1 of this permit and attached at Appendix 1.
Non-conformity	Any act or omission by the Operator, either intentional or unintentional, that is contrary to the greenhouse gas emissions permit and the requirements of the Monitoring Plan.
The National Administrator	The person so designated in accordance with the requirements of any Regulations adopted as provided for under Article 19.3 of Directive 2003/87/EC.
The Operator (for the purposes of this permit)	Lakeland Dairies Co-Operative Society Limited
“operator”	Any person who operates or controls an installation or to whom decisive economic power over the functioning of the installation has been delegated.
Person	Any natural or legal person.
Reportable emissions	The total releases to the atmosphere of carbon dioxide (expressed in tonnes of carbon dioxide equivalent) from the emission sources specified in Table 2 and arising from the Schedule 1 activities which are specified in Table 1.
The Regulations	European Communities (Greenhouse Gas Emissions Trading) Regulations 2012 (S.I. No 490 of 2012) and any amendments or revisions thereto.
The Verifier	A legal person or another legal entity carrying out verification activities pursuant to Regulation (EU) No 600/2012 and accredited by a national accreditation body pursuant to Regulation (EC) No 765/2008 and Regulation (EU) No 600/2012 or a natural person otherwise authorised, without prejudice to Article 5(2) of Regulation (EC) No 765/2008, at the time a verification report is issued.
The Registry	The Registry as provided for under Article 19 of Directive 2003/87/EC.

Schedule 1

Schedule 1 to the Regulations.



Reasons for the Decision

The Agency is satisfied, on the basis of the information available, that subject to compliance with the conditions of this permit, the Operator is capable of monitoring and reporting emissions in accordance with the requirements of the Regulations.

Activities Permitted

Pursuant to the Regulations the Agency issues this Greenhouse Gas Emissions Permit, subject to any subsequent revisions, corrections or modifications it deems appropriate, to:

The Operator:

Lakeland Dairies Co-Operative Society Limited
Church Street
Killeshandra
Cavan
H12 V273

Company Registration Number: 4622R

to carry out the following

Categories of activity:

Annex 1 Activity

Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
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at the following installation(s):

Bailieboro Foods Limited **Installation number:** 13

located at

Lear
Bailieborough
Cavan
A82 N6K8
Ireland

subject to the five conditions contained herein, with the reasons therefor and associated tables attached thereto.

Conditions

Condition 1. The Permitted Installation

- 1.1 This permit is being granted in substitution for the previous GHG permit granted to the Operator as listed in the Status Log of this GHG permit.
- 1.2 The Operator is authorised to undertake the activities and/or the directly associated activities specified in Table 1 below resulting in the emission of carbon dioxide:

Table 1 - Activities which are listed in Schedule 1 of the Regulations and other directly associated activities carried out on the site:

Installation No.: 13

Activity Description
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)

Directly Associated Activity Description
(WWTP) Wastewater Treatment Plant

- 1.3 Carbon dioxide from Schedule 1 activities shall be emitted to atmosphere only from the emission sources as listed in Table 2 below:

Table 2 Emission Sources and Capacities:

Emission Source Reference	Emission Source Description	Capacity	Capacity Units
S2	Boiler 1	7.7	MW
S3	Boiler 2	7.7	MW
S4	Boiler 3	9.7	MW
S5	Boiler 4	9.7	MW
S7	Administration Central Heating Boiler	0.88	MW
S8	Lab Heating Boiler	0.15	MW
S9	Stores Heating	0.2	MW

Emission Source Reference	Emission Source Description	Capacity	Capacity Units
S1-1	Gas Turbine (CHP)	18.16	MW
S1-2	Waste Heat Recovery Unit	11.66	MW
S13	Drier 2 Air Heater	1.6	MW
S14	Drier 3 Air Heater	2.68	MW
S15-1	Gas Turbine 2	18.16	MW
S15-2	Waste Heat Boiler 2	12.22	MW
S19	CHB003 admin boiler	0.08	MW
S16	Mobile power washer	0.01	MW
S17	Maintenance Acetylene	0.07	MW
S18	Bunsen Burners	0.01	MW
S20	Mobile Garage Heater	0.04	MW

- 1.4 The activity shall be controlled, operated and maintained so that emissions of carbon dioxide shall take place only as set out in this GHG Emissions Permit. The permit does not control emissions of gases other than carbon dioxide. All agreed plans, programmes and methodologies required to be carried out under the terms of this permit, become part of this permit.
- 1.5 This GHG Permit is for the purposes of GHG emissions permitting under the European Communities (Greenhouse Gas Emissions Trading) Regulations 2012 and any amendments to the same only and nothing in this permit shall be construed as negating the Operator's statutory obligations or requirements under any other enactments or regulations unless specifically amended by the Regulations.
- 1.6 Any reference in this permit to 'installation' shall mean the installation as described in the Greenhouse Gas Emissions Permit application and any amendments approved by the Agency.

Reason: To describe the installation and clarify the scope of this permit.

Condition 2. Notification

- 2.1 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in a change in:
- 2.1.1 the nature or functioning of the installation;
 - 2.1.2 the capacity of the installation as detailed in this permit;
 - 2.1.3 the fuels used at the installation;
 - 2.1.4 the range of activities to be carried out at the installation
- that may require updating of the GHG permit shall be carried out or commenced without prior notice to and without the prior written agreement of the Agency.
- 2.2 The Operator shall notify the Agency in writing of the cessation of all or part of any activity listed in Table 1 of this permit no later than one month from the date of cessation or by 31 December of the year of cessation, whichever is sooner.
- 2.3 The Operator shall apply for an update of this GHG Permit where there is a change to the Operator name and/or registered address of the Operator, within seven days of the change.
- 2.4 For installations or parts of installations which have not come into operation when the application for this permit was made the Operator shall notify the Agency of the date of commencement of the activity within seven days of commencement.
- 2.5 The Operator shall notify the Agency in writing within three days of becoming aware of any factors which may prevent compliance with the conditions of this permit.
- 2.6 The Operator shall submit to the Agency by 21 January of each year a declaration of operability. The declaration submitted shall be in the format required by the Agency.
- 2.7 All notifications required under Condition 2 above shall be made to the address given in the Explanatory Note included with this permit.
- 2.8 The Operator shall submit to the Agency by 31 December of each year all relevant information about any planned or effective changes to the capacity, activity level and operation of an installation. The information submitted shall be in the format required by the Agency.

Reason: To provide for the notification of updated information on the activity.

Condition 3. Monitoring and Reporting

- 3.1 The Operator shall monitor and record greenhouse gas emissions on site in accordance with the M&R Regulation and the approved Monitoring Plan attached at Appendix 1 to this GHG permit and in compliance with any other guidance approved by the Agency for the purposes of implementing the Directive and/or the Regulations.
- 3.2 The Operator shall modify the monitoring plan in any of the following situations:
- 3.2.1 new emissions occur due to new activities carried out or due to the use of new fuels or materials not yet contained in the monitoring plan;
 - 3.2.2 the change of availability of data, due to the use of new measurement instrument types, sampling methods or analysis methods, or for other reasons, leads to higher accuracy in the determination of emissions;

- 3.2.3 data resulting from the previously applied monitoring methodology has been found incorrect;
- 3.2.4 changing the monitoring plan improves the accuracy of the reported data, unless this is technically not feasible or incurs unreasonable costs;
- 3.2.5 the monitoring plan is not in conformity with the requirements of the M&R Regulation and the Agency requests a change;
- 3.2.6 it is necessary to respond to the suggestions for improvement of the monitoring plan contained in the verification report.

The Operator shall notify any proposals for modification of the monitoring plan to the Agency without undue delay. Any significant modifications of the monitoring plan, as defined in Article 15 of the M&R Regulation, shall be subject to approval by the Agency. Where approved these changes shall be implemented within a timeframe agreed by the Agency.

3.3 Temporary changes to the monitoring methodology:

3.3.1 Where it is for technical reasons temporarily not feasible to apply the tier in the monitoring plan for the activity data or each calculation factor of a fuel or material stream as approved by the Agency, the Operator shall apply the highest achievable tier until the conditions for application of the tier approved in the monitoring plan have been restored. The Operator shall take all necessary measures to allow the prompt restoration of the tier in the approved monitoring plan. The Operator shall notify the temporary change to the monitoring methodology without undue delay to the Agency specifying:

- (i) The reasons for the deviation from the tier;
- (ii) in detail, the interim monitoring methodology applied by the Operator to determine the emissions until the conditions for the application of the tier in the monitoring plan have been restored;
- (iii) the measures the Operator is taking to restore the conditions for the application of the tier in the approved monitoring plan;
- (iv) the anticipated point in time when application of the approved tier will be resumed.

3.3.2 A record of all non-compliances with the approved monitoring plan shall be maintained on-site and shall be available on-site for inspection by authorised persons of the Agency and/or by the Verifier at all reasonable times.

3.4 The Operator shall appoint a Verifier to ensure that, before their submission, the reports required by Condition 3.5 below are verified in accordance with the criteria set out in Schedule 5 of the Regulations, the A&V Regulation and any more detailed requirements of the Agency.

3.5 The written report of the verified annual reportable emissions and the verification report in respect of each calendar year shall be submitted to the Agency by the Operator no later than 31 March of the following year. The reports shall be in the format required by the Agency and meet the criteria set out in the M&R and A&V Regulations.

3.6 The Operator shall enter the verified annual reportable emissions figure for the preceding year into the Registry no later than 31 March of the following year. This figure shall be electronically approved by the Verifier in the registry no later than 31 March of each year.

3.7 Where an Operator is applying the Fall-Back methodology, the Operator shall assess and quantify each year the uncertainties of all parameters used for the determination of the annual emissions in accordance with the ISO Guide to the Expression of Uncertainty in Measurement or another equivalent internationally accepted standard and include the verified results in the written report of the verified annual reportable emissions to be submitted to the Agency by 31 March each year.

- 3.8 An Operator shall submit to the Agency for approval a report containing the information detailed in (i) or (ii) below, where appropriate, by the following deadlines:
- (a) for a category A installation, by 30 June every four years;
 - (b) for a category B installation, by 30 June every two years;
 - (c) for a category C installation, by 30 June every year.
- (i) Where the Operator does not apply at least the tiers required pursuant to the first subparagraph of Article 26(1) and to Article 41(1) of the M&R Regulation, the Operator shall provide a justification as to why it is technically not feasible or would incur unreasonable costs to apply the required tiers. Where evidence is found that measures needed for reaching those tiers have become technically feasible and do not incur unreasonable costs, the Operator shall notify the Agency of appropriate modifications to the monitoring plan and submit proposals for implementing appropriate measures and its timing.
- (ii) Where the Operator applies a fall-back monitoring methodology, the Operator shall provide a justification as to why it is technically not feasible or would incur unreasonable costs to apply at least tier 1 for one or more major or minor source streams. Where evidence is found that measures needed for reaching at least tier 1 for those source streams have become technically feasible and do not incur unreasonable costs, the Operator shall notify the Agency of appropriate modifications to the monitoring plan, submit proposals and a timeframe for implementing appropriate measures.
- 3.9 Where the verification report states outstanding non conformities, misstatements or recommendations for improvements the Operator shall submit a report to the Agency for approval by 30 June of the year in which the verification report is issued. This requirement does not apply to the Operator of an installation with low emissions where the verification report contains recommendations for improvements only. The report shall describe how and when the Operator has rectified or plans to rectify the non-conformities identified and to implement recommended improvements. Where recommended improvements would not lead to an improvement of the monitoring methodology this must be justified by the Operator. Where the recommended improvements would incur unreasonable costs the Operator shall provide evidence of the unreasonable nature of the costs. The Operator shall implement the improvements specified by the Agency in response to the report submitted in accordance with this Condition in accordance with a timeframe set by the Agency.
- 3.10 The Operator shall make available to the Verifier and to the Agency any information and data relating to emissions of carbon dioxide which are required in order to verify the reports referred to in Condition 3.5 above or as required by the Agency to facilitate it in establishing benchmarks and/or best practice guidance.
- 3.11 Provision shall also be made for the transfer of environmental information, in relation to this permit, to the Agency's computer system, as may be requested by the Agency.
- 3.12 The Operator shall retain all information as specified in the M&R Regulation for a period of at least 10 years after the submission of the relevant annual report.
- 3.13 A record of independent confirmation of capacities listed in this permit shall be available on-site for inspection by authorised persons of the Agency at all reasonable times.
- 3.14 The Operator shall keep records of all modifications of the monitoring plan. The records shall include the information specified in Article 16.3 of the M&R Regulation.
- 3.15 The Operator shall ensure that members of the public can view a copy of this permit and any reports submitted to the Agency in accordance with this permit at all reasonable times. This

requirement shall be integrated with the requirements of any public information programme approved by the Agency in relation to any other permit or licence held by the Operator for the site.

Reason: To provide for monitoring and reporting in accordance with the Regulations.

Condition 4. Allowances

4.1 Surrender of Allowances

4.1.1 The Operator shall, by 30 April in each year, surrender to the Agency, or other appropriate body specified by the Agency, allowances equal to the annual reportable emissions in the preceding calendar year.

4.1.2 The number of allowances to be surrendered shall be the annual reportable emissions for the preceding calendar year plus such allowances as may be necessary to cover any earlier calendar year in respect of which allowances remain outstanding and due. This includes allowances to cover the amount of any annual reportable emissions in respect of which allowances were not surrendered in accordance with Condition 4.1.1 in the previous year, and the amount of any reportable emissions which were discovered during the previous year to have been unreported in reports submitted under Condition 3 in that or in earlier years.

4.1.3 In relation to activities or parts of activities which have ceased to take place and have been notified to the Agency in accordance with Condition 2.2 above, the Operator shall surrender to the Agency allowances equal to the annual reportable emissions from such activities in the preceding calendar year or part thereof, together with such allowances as may be necessary to cover any earlier calendar year in respect of which allowances remain outstanding and due as described in Condition 4.1.2 above.

4.1.4 The Operator may, from 2008 onwards, subject to the provisions of the Regulations and the relevant National Allocation Plan for that compliance year, surrender emission reduction units (ERUs) and certified emission reduction units (CERs) in place of allowances.

4.2 The holding, transfer, surrender and cancellation of allowances shall be in accordance with the requirements of any Regulations adopted as provided for under Article 19.3 of Directive 2003/87/EC, any amendment or revision to the same and any guidance issued by the Agency or the National Administrator.

4.3 The Operator shall provide the National Administrator with all the necessary information for the opening of an Operator holding account for the installation described in Condition 1 of this permit within twenty working days of the issue of this permit, unless such an account is already open.

Reason: To provide for the surrendering, holding, transfer and cancellation of allowances in respect of reported emissions.

Condition 5. Penalties

5.1 Any Operator who fails to comply with Condition 4.1 above shall be subject to the provisions of the Regulations, including, but not limited to the payment of penalties.

Reason: To provide for the payment of excess emissions penalties as required under the Regulations.

Sealed by the seal of the Agency on this the 22 January 2019:

PRESENT when the seal of the Agency was affixed hereto:

Dr Suzanne Monaghan
Inspector/ Authorised Person

Appendix 1 to Greenhouse Gas Emissions Permit Number IE-GHG015-10345

Monitoring Plan

1. Guidelines & Conditions

1. Directive 2003/87/EC as amended by Directive 2009/29/EC (hereinafter "the (revised) EU ETS Directive") requires operators of installations which are included in the European Greenhouse Gas Emission Trading Scheme (the EU ETS) to hold a valid GHG emission permit issued by the relevant Competent Authority and to monitor and report their emissions and have the reports verified by an independent and accredited verifier.

The Directive can be downloaded from:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2003L0087:20090625:EN:PDF>

2. The Monitoring and Reporting Regulation (Commission Regulation (EU) No 601/2012) (hereinafter the "MRR") defines further requirements for monitoring and reporting.

The MRR can be downloaded from:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:181:0030:0104:EN:PDF>

Article 12 of the MRR sets out specific requirements for the content and submission of the monitoring plan and its updates. Article 12 outlines the importance of the Monitoring plan as follows:

The monitoring plan shall consist of a detailed complete and transparent documentation of the monitoring methodology of a specific installation [or aircraft operator] and shall contain at least the elements laid down in Annex I.

Furthermore Article 74(1) states:

Member States may require the operator and aircraft operator to use electronic templates or specific file formats for submission of monitoring plans and changes to the monitoring plan as well as for submission of annual emissions reports tonne-kilometre data reports verification reports and improvement reports. Those templates or file format specifications established by the Member States shall at least contain the information contained in electronic templates or file format specifications published by the Commission

3. All Commission guidance documents on the Monitoring and Reporting Regulation will be published at the link below as they become available:

http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm

(a) Information sources:

EU Websites:

EU-Legislation: <http://eur-lex.europa.eu/en/index.htm>

EU ETS general: http://ec.europa.eu/clima/policies/ets/index_en.htm

Monitoring and Reporting in the EU ETS: http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm

Environmental Protection Agency Website:

<http://www.epa.ie>

Environmental Protection Agency Contact:

GHGpermit@epa.ie

2. Application Details

The Installation Name, Site Name and the address of the site of the installation are detailed below. The Site Name and address can be updated from the Organisation Details Page on the ETSWAP website. The Installation Name can only be updated by your Competent Authority.

Installation name	Bailieboro Foods Limited
Site name	Bailieboro Foods Limited
Address	Lear Bailieborough Cavan A82 N6K8 Ireland

Grid reference of site main entrance	E267722, N298021
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Licence held pursuant to the Environmental Protection Agency Act 1992, as amended.	Yes
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IPC/IE Licence Register Number	Licence holder	Competent body
P0406-05	Bailieboro Foods Limited	Environmental Protection Agency

Has the regulated activity commenced at the Installation? Yes

Date of Regulated Activity commencement	01 January 2008
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This information is only required to identify the first relevant reporting year of an installation. If the installation was in operation from the beginning of 2008 and held a Greenhouse Gas Emissions Permit from this point, 1 January 2008 will be used where the actual date of commencement is not readily known.

3. About the Operator

The information about the "Operator" is listed below. The "Operator" is defined as the person who it is proposed will have control over the relevant Regulated Activities in the installation in respect of which this application is being made.

(b) Operator Details

The name of the operator and where applicable the company registration number are detailed below. These details can only be updated by the Environmental Protection Agency.

Operator name Lakeland Dairies Co-Operative Society Limited

Company Registration Number 4622R

Operator Legal status

The legal status of the operator is: Company / Corporate Body

(c) Company / Corporate Body

Is the trading / business name different to the operator name? Yes

Trading / business name Bailieboro Foods Limited

Registered office address

Address Line 1 Church Street
Address Line 2 N/A
City/Town Killeshandra
County Cavan
Postcode H12 V273

Principal office address

Is the principal office address different to the registered office address? Yes

Address Line 1 Lear
Address Line 2 N/A
City/Town Bailiebrough
County Cavan
Postcode A82 N6K8
Company registration number 113714

Holding company

Does the company belong to a holding company? No

(d) Operator Authority

Does the operator named above have the authority and ability to:

- a. manage site operations through having day-to-day control of plant operation including the manner and rate of operation Yes
- b. ensure that permit conditions are effectively complied with Yes
- c. control monitor and report specified emissions Yes

- d. be responsible for trading in Allowances so that at the end of a reporting period allowances can be balanced against reported emissions. Yes

4. Service Contact

e. Service Contact

Address	Lear Bailieborough Cavan A82 N6K8 Ireland
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5. Installation Activities

f. Installation Description

Below is a description of the installation and its activities, a brief outline description of the site and the installation and the location of the installation on the site. The description also includes a non-technical summary of the activities carried out at the installation briefly describing each activity performed and the technical units used within each activity.

Lakeland Dairies, Bailieborough is situated at Lear, Bailieborough County Cavan. The site is on the outskirts of Bailieborough town on the Shercock Road.

The site produces a range of milk powders and butter, continuously processing milk from a catchment area ranging from the border Midlands area and Northern Ireland.

The principle energy source on site is natural gas which is used to operate two gas turbines which provides the site with electricity and steam. The gas turbines and waster heat recovery (18.16 & 18.16 MW) are operated by Dalkia with the gas being supplied by Lakeland Dairies. Four boilers (7.7, 7.7, 9.7 and 9.7 MW) operated by Lakeland Dairies provide back up to the steam turbine.

Two Waste heat recovery units (11.66 & 12.22 MW) also run on Natural Gas.

Minor combustion activities on the site are central heating boilers (powered by a mixture of Gas Oil and Kerosene) and maintenance equipment (powered by a mixture of Petrol, Acetylene and LPG). Bottled propane is also used for boiler ignition purposes.

g. Annex 1 Activities

The table below lists the technical details for each Annex 1 activity carried out at the installation.

Note that 'capacity' in this context means:

- Rated thermal input (for combustion installations) which is defined as the rate at which fuel can be burned at the maximum continuous rating of the installation multiplied by the calorific value of the fuel and expressed as megawatts thermal.
- Production capacity for those specified Annex I activities for which production capacity determines ETS eligibility.

Annex 1 Activity	Total Capacity	Capacity units	Specified Emissions
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)	100.72	MW	Carbon Dioxide

h. Site Diagram

The table below lists attachments (if available) that provide a simple diagram showing emissions sources source streams sampling points and metering/measurement equipment.

Attachment	Description
15 100 004-Air Emission Points.pdf	2015 Site Map
Rev C 17.001.200 - Greenhouse Gas Emissions Points.pdf	Revised site drawing 2017
2018 Site Drawing Greenhouse Gas Emissions.pdf	2018 Site Drawing

i. Estimated Annual Emissions

Detail of the estimated annual emission of CO₂ equivalent. This information enables categorisation of the installation in accordance with Article 19 of the MRR and is based on the average verified annual emissions of the previous trading period data OR if this data is not available or is inappropriate a conservative estimate of annual average emissions including transferred CO₂ excluding CO₂ from biomass.

Estimated Annual Emissions (tonnes CO_{2(e)}) 70000

Justification for the use of a conservative estimate of CO₂ emissions. Due to increased capacity at the installation during Phase II of the EU ETS the previous average of the last trading period is not longer representative of the emissions.

The new estimation is based on planned production and emissions from 2017.

6. Emissions Details

j. About your emissions

Annex I of the Monitoring and Reporting Regulations (MRR) requires that monitoring plans include a description of "the installation" and activities to be carried out and monitored including a list of emission sources and source streams. The information provided in this template relates to the Annex I activity(ies) comprised in the installation in question and should relate to a single installation. It includes any activities carried out by the operator and does not include related activities carried out by other operators.

k. Emission Sources

The table below lists all the emission sources at the installation, which may include directly associated activities/excluded activities.

Emission Source Reference	Emission Source Description
S1-1	Gas Turbine (CHP)
S2	Boiler 1
S3	Boiler 2
S4	Boiler 3
S5	Boiler 4
S7	Administration Central Heating Boiler
S8	Lab Heating Boiler
S9	Stores Heating
WWTP	Wastewater Treatment Plant
S1-2	Waste Heat Recovery Unit
S13	Drier 2 Air Heater
S14	Drier 3 Air Heater
S15-1	Gas Turbine 2
S15-2	Waste Heat Boiler 2
S16	Mobile power washer
S17	Maintenance Acetylene
S18	Bunsen Burners
S19	CHB003 admin boiler
S20	Mobile Garage Heater

The table below lists the emission sources which are linked to the Regulated Activities at the installation.

Emission Source Reference	Emission Source Description
S2	Boiler 1

Emission Source Reference	Emission Source Description
S3	Boiler 2
S4	Boiler 3
S5	Boiler 4
S7	Administration Central Heating Boiler
S8	Lab Heating Boiler
S9	Stores Heating
S1-1	Gas Turbine (CHP)
S1-2	Waste Heat Recovery Unit
S13	Drier 2 Air Heater
S14	Drier 3 Air Heater
S15-1	Gas Turbine 2
S15-2	Waste Heat Boiler 2
S19	CHB003 admin boiler
S16	Mobile power washer
S17	Maintenance Acetylene
S18	Bunsen Burners
S20	Mobile Garage Heater

I. Emission Points

The table below lists all the emission points at the installation, which may include directly associated activities/excluded activities.

Emission Point Reference	Emission Point Description
A25	CHP and Waste Heat Recovery Unit Stack
A1-1	Boiler 1 Stack
A1-2	Boiler 2 Stack
A1-5	Boiler 3 Stack
A1-6	Boiler 4 Stack
CHB-001	Administration Central Heating Boiler Flue
CHB-002	Lab Heating Boiler Flue
SH-001	Stores Heating Exhaust
CHB-003	Admin boiler exhaust
WWTP-001	Wastewater Treatment Plant
A22	Air Heater Drier2
A23	Air Heater Drier3
A26	Gas Turbine and Waste Heat Boiler

Emission Point Reference	Emission Point Description
A30	Mobile power washer
A31	Maintenance Acetylene
A32	Bunsen burners
A33	Mobile Garage Heater

m. Source Streams (fuels and/or materials)

The table below lists the source streams which are used in Schedule 1 Activities at the installation.

Source Stream Reference	Source Stream Type	Source Stream Description
F1 (Natural Gas)	Combustion: Other gaseous & liquid fuels	Natural Gas
F2 (Gas Oil)	Combustion: Commercial standard fuels	Gas/Diesel Oil
F3 (Kerosene)	Combustion: Commercial standard fuels	Kerosene (other than jet kerosene)
F4 (Propane)	Combustion: Commercial standard fuels	Propane
F5 (Petrol)	Combustion: Commercial standard fuels	Petrol
F6 (Acetylene)	Combustion: Other gaseous & liquid fuels	Acetylene
F7 (LPG)	Combustion: Commercial standard fuels	Liquefied Petroleum Gases

n. Emissions Summary

The table below provides a summary of the emission source and source stream details in the installation.

Source streams (Fuel / Material)	Emission Source Refs.	Emission Point Refs.	Annex 1 Activity
F1 (Natural Gas)	S1-1,S2,S3,S4,S5,S1-2,S13,S14,S15-1,S15-2	A25,A1-1,A1-2,A1-5,A1-6,A22,A23,A26	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
F2 (Gas Oil)	S8	CHB-002	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except

Source streams (Fuel / Material)	Emission Source Refs.	Emission Point Refs.	Annex 1 Activity
			in installations for the incineration of hazardous or municipal waste)
F3 (Kerosene)	S19,S20,S7,S9	A33,CHB-001,CHB-003,SH-001	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
F4 (Propane)	S2,S3,S4,S5,S1-2	A25,A1-1,A1-2,A1-5,A1-6	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
F5 (Petrol)	S16	A30	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
F6 (Acetylene)	S17	A31	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
F7 (LPG)	S18	A32	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)

o. Excluded Activities

Certain activities that result in greenhouse gas emissions may be excluded under the EU ETS Directive for example truly mobile sources such as vehicle emissions.

Do you have any excluded activities which need to be identified in your monitoring plan? Yes

Detail of these activities:

Source Stream Refs	Emission Source Ref	Emission Point Ref
n/a	WWTP	WWTP-001

7. Low Emissions Eligibility

p. Low Emissions Eligibility

The operator may submit a simplified monitoring plan for an installation where no nitrous oxide activities are carried out and it can be demonstrated that:

(a) the average verified annual emissions of the installation during the previous trading period was less than 25 000 tonnes CO_{2(e)} per year or;

(b) where this data is not available or inappropriate a conservative estimate shows that emissions for the next 5 years will be less than 25 000 tonnes CO_{2(e)} per year.

Note: the above data shall include transferred CO₂ but exclude CO₂ stemming from biomass.

Does the installation satisfy the criteria for installations with low emissions (as defined by Article 47 of the MRR)? No

8. Monitoring Approaches

q. Monitoring Approaches

Emissions may be determined using either a calculation based methodology ("calculation") or measurement based methodology ("measurement") except where the use of a specific methodology is mandatory according to the provisions of the MRR. [MRR Article 21].

Note: the operator may subject to competent authority approval combine measurement and calculation for different sources. The operator is required to ensure and demonstrate that neither gaps nor double counting of reportable emissions occurs.

Please specify whether or not you propose to apply the following monitoring approaches. Select all monitoring approaches that are applicable to you. The consecutive sections will become mandatory based on the selected approaches.

Calculation	Yes
Measurement	No
Fall-back approach	No
Monitoring of N ₂ O	No
Monitoring of PFC	No
Monitoring of transferred / inherent CO ₂	No

9. Calculation

r. Approach Description

The calculation approach including formulae used to determine annual CO₂ emissions:

The following formula is used to calculate the total CO₂ emissions.

$EM = AD \times EF \times OF$, where $EM = tCO_2$, $AD = TJ$, $EF = \text{Emission factor}$ and $OF = \text{Oxidation factor}$.

When calculating the emissions, the data for the above calculation is assembled as follows:

Natural Gas:

Monthly Gas Reports containing hourly gas flow consumption and hourly gas analysis are received from Gas Networks Ireland. These reports give the hourly M³ of gas used plus an hourly report from the nearest gas chromatograph which breaks down the gas analysis into 12 different headings showing the specific gravity and the various percentages of the natural gas make up (methane, butane, propane etc.). Gas Networks Ireland calibration of on-line chromatographs is accredited to EN ISO 17025:2005. Initial and annual calibration is carried out using EN ISO 10723.

The emission factor determination will comply with Tier 3 requirements

The data from the Gas Networks Reports is inserted into a spread sheet which calculates the carbon content per normal cubic meter of gas. The Carbon Content is calculated using the following formula:

Molecular Weight X % analysis X 10 / 22.414 (example for methane as follows)

Methane analysis 91.34%. Methane formula CH₄. Molecular Weight Methane 16.043.

$16.043 \times 91.34 \times 10 / 22.414 = 653.77\text{g methane.}$

$653.77\text{g} \times 12.011(\text{atomic wt Carbon}) / 16.043 = 489.46\text{ g Carbon.}$

The above calculation is carried out for all the various constituents of the gas and the results are added together to give the total carbon weight in grams. The total is multiplied by 44.09 (molecular wt CO₂) and divided by 12.011 (atomic wt carbon) to give the total weight of CO₂/Normal M³.

A copy of the calculation spreadsheet is attached - 'Bailieboro Nat Gas Calcs'.

The following formula is then used to calculate the CO₂ Emissions from the natural gas:

$\text{Emissions} = \text{M}^3 \text{ gas} \times \text{Carbon Dioxide wt.}$

In the event that hourly GNI data is incomplete it is suggested to use the average of the previous two hours to complete calculations for the missing period.

The Resulting Monthly emissions are cross checked against the calculated emissions using the invoice data and against the gascalc software package which calculates Emission Factors, Calorific values etc.

Further detail of the Gas Calculations are given below and please see the attached excel spreadsheet for a worked example of this methodology.

Gas Calculations

1. On a monthly basis GNI will supply the monthly gas report. This report shows gas consumption on an hourly basis and is broken down as per the different properties of the Gas
2. The Headings on this BGE report are as follows
 - a. Timestamp – Showing date & hour
 - b. Turbine Vol 1 (m3 x 100)
 - c. Hourly Steam Take 1
 - d. Turbine Vol 2 (m3 x 100)
 - e. Hourly Steam Take 2
 - f. CV (MJ/M3)
 - g. Sample gas “SG”
 - h. CO2 (%)
 - i. Methane (%)
 - j. Ethane (%)
 - k. Propane (%)
 - l. No-Butane (%)
 - m. Iso-Butane (%)
 - n. No-Pentane (%)
 - o. Neo-Pentane (%)
 - p. Iso-Pentane (%)
 - q. Hexane (%)
 - r. Nitrogen (%)

Step 1 Calculate Net CV (MJ/M3)

The NCV must be calculated using ISO 6976 guidance methodology to calculate both gross and net calorific value of natural gas from component analysis data this method and an emission factor calculated TCO₂/TJ.

- i. Multiply the individual gas component % by the superior calorific value at 0°C for that component from table 3 ISO 6976 and divide by 100. Total the results of all the individual component calculations.

- ii. Repeat the above calculations using the inferior calorific value per component from table 3 ISO 6976.
- iii. The real superior and inferior calorific values of the gas are calculated by using the sums of 1 or 2 above and multiplying by $101.325 / 8314.51(\text{molar gas constant}) \times 273.15 \times 1000 / Z_{\text{mix}}$. Z_{mix} is calculated using data from table 2 ISO 6976 and formula D6 on page 22 iso 6976,.

Step 2 For Each gas listed H-R inclusive ascertain the:-

1. Molecular Weight

Example: Methane (CH₄)

Molecular Weight = C + (H*4),

Where C = 12.011

Where H = 1.008

Molecular weight of CH₄=16.043

2. Total Gas Component Weight broken down into

- a. Weight (gm)
- b. Carbon weight (gm)
- c. Hydrogen weight (gm)

Example: Methane (CH₄)

a. Weight (gm)

= $i \times 10 \times \text{Molecular weight} / 22.414$

Where under the Ideal Gas Law of $PV=nRT$

1mol of ideal gas occupies this volume (litres) at STP: = 22.414

ST: 0

SP: 1.03125

b. Carbon weight (gm)

= $\text{Weight} \times C / \text{Molecular weight}$

c. Hydrogen weight (gm)

=Weight*(H*4)/ Molecular weight

Step 3 Total CO2 (gm) /SCM =

(Σ carbon weight (gm)) * (Molecular figure for carbon dioxide)

/ (Molecular figure for Carbon)

Where Molecular figure for Carbon Dioxide = C+(O*2) = 12.011 + (15.999*2) = 44.009

Step 4 Tonnes CO2 / hr = Total CO2 (gm) /SCM * (c+e)*100/1000000

Step 5 Tonnes CO2 / hr with Oxidation factor = Tonnes CO2 / hr*Oxidation factor

Oxidation factor must be agreed as per M&R Regulations = 1

Step 6 Tonnes CO2 / Day = Σ (Tonnes CO2 / hr with Oxidation factor) per 24hr day from 0.00hrs to 23.00hrs

Step 7 Tonnes CO2 / Month = Σ Tonnes CO2 / Day of the month per calendar month

Step 8 Annual CO2= Σ Tonnes CO2 /month for January – December inclusive

Step 9 Calculate the emission factor by dividing the total annual tonnes of CO2 by the total TJ of natural gas

Step 10 To carry out a cross check of the calculations the GacCalc programme is used to determine the emissions from natural gas. This will be recorded on the overview spreadsheets. In addition check with the previous year "month" calculated emissions as a double check to ensure that the figure falls within an expected range (Given known changes in activity).

Step 11 Twice a year the Environmental Services manager will audit the gas calculations.

In the event that GNI cannot give data for a specific hour, the EPA should be notified in accordance with the permit requirements, of the missing data and agree an alternative methodology to calculate data for the missing hours data.

Any incidents of missing data should be noted in the Annual Installation Emissions Report.

Suggested methodology for calculation of the missing hours could be to take the best available data for the 2 hours immediately prior and the available data for the 2 hours immediately after and use the average figure of the 4 hours as the hourly data for the missing hour.

With respect to gaps/a change in the % proportion of the gas elements revert to Bord Gais to seek an amended / suggested best fit data and amend accordingly.

Gas Oil/ Kerosene/Propane/ Petrol /Acetylene/LPG:

The activity data for each year will be calculated using the formula below:

Energy content of fuel consumption [TJ] = fuel consumed [t or m3] * net calorific value of the fuel [TJ/t or TJ/m3].

The monthly CO2 emissions will be calculated using the formula below:

CO2 emissions = Activity data [TJ/m3] * Emission Factor [tCO2/TJ] * Oxidation factor. The Activity data will be based on Purchases and Stock Transfers from the stores department. The factors for the NCV and EF will be taken from the EPA website. Ox factor will be tier 1.

Usage is based on Tank dips (Kerosene, Gas Oil) and Purchases/ Stock Transfer (Propane, Petrol, LPG, Acetylene)

s. Measurement Devices

Below is a description of the specification and location of the measurement systems used for each source stream where emissions are determined by calculation

Also a description of all measurement devices including sub-meters and meters used to deduct non-Annex I activities to be used for each source and source stream.

Source Stream Refs.	Emission Source Refs.	Measurement Device Ref.	Type of Measurement Device	Measurement Range	Metering Range Units	Specified Uncertainty (+/- %)	Location
F1 (Natural Gas)	S1-1,S1-2,S15-1,S15-2	M1 (Serial # 83038950)	Turbine meter	0-2,700	Sm ³ /h	1.41	Drumbannon
F1 (Natural Gas)	S1-1,S1-2,S15-1,S15-2	M2 (Serial # 80088175-2009)	Turbine meter	0-5,000	Sm ³ /h	1.41	Drumbannon
F1 (Natural Gas)	S1-1,S2,S3,S4,S5,S1-2,S13,S14,S15-1,S15-2	M3 (Serial # 80088176-2009)	Turbine meter	0-5,000	Sm ³ /h	1.41	Drumbannon
F3 (Kerosene)	S19,S20,S7,S9	M6	Rotary meter	2-99,999	litres	1	Delivery truck
F3 (Kerosene)	S7,S19,S20	Stock take kero tank admin	dip	2,000	litres	5.0	admin tank
F3 (Kerosene)	S9	Stock take - Kerosene	dip	1050	litres	5.0	Administration
F4 (Propane)	S2,S3,S4,S5,S1-2	Stock transfer	Stock control system	N/A	N/A	N/A	Stores
F5 (Petrol)	S16	log book	purchase log book	N/a	litres	N/a	Enviro office
F6 (Acetylene)	S17	Stock transfer acetylene	Stock control system	n/a	n/a	n/a	stores
F7 (LPG)	S18	Stock transfers Butane	Stock control system	n/a	n/a	n/a	stores
F2 (Gas Oil)	S8	Stock take	Tank dip	1000	litres	5	creamery

Source Stream Refs.	Emission Source Refs.	Measurement Device Ref.	Type of Measurement Device	Measurement Range	Metering Range Units	Specified Uncertainty (+/- %)	Location
F2 (Gas Oil)	S8	M7	Rotary meter	2-99999	litres	1	Delivery truck

Source Stream Refs.	Measurement Device Ref.	Determination Method	Instrument Under Control Of	Conditions Of Article 29(1) Satisfied	Invoices Used To Determine Amount Of Fuel Or Material	Trade Partner And Operator Independent
F1 (Natural Gas)	M1 (Serial # 83038950)	Continual	Trade partner	Yes	Yes	Yes
F1 (Natural Gas)	M2 (Serial # 80088175-2009)	Continual	Trade partner	Yes	Yes	Yes
F1 (Natural Gas)	M3 (Serial # 80088176-2009)	Continual	Trade partner	Yes	Yes	Yes
F3 (Kerosene)	M6	Batch	Trade partner	Yes	Yes	Yes
F3 (Kerosene)	Stock take kero tank admin	Batch	Operator	N/A	Yes	N/A
F3 (Kerosene)	Stock take - Kerosene	Batch	Operator	N/A	Yes	N/A
F4 (Propane)	Stock transfer	Batch	Operator	N/A	Yes	N/A
F5 (Petrol)	log book	Batch	Operator	N/A	Yes	N/A
F6 (Acetylene)	Stock transfer acetylene	Batch	Operator	N/A	Yes	N/A
F7 (LPG)	Stock transfers Butane	Batch	Operator	N/A	Yes	N/A
F2 (Gas Oil)	Stock take	Batch	Operator	N/A	Yes	N/A
F2 (Gas Oil)	M7	Batch	Trade partner	Yes	Yes	Yes

t. Applied Tiers

The table below identifies the tiers applied against the relevant input data for each source stream and confirms whether a standard (MRR Article 24) or mass balance (MRR Article 25) approach is applied.

(i) The highest tiers as defined in Annex II of the MRR should be used by Category B and C installations to determine the activity data and each calculation factor (except the oxidation factor and conversion factor) for each major source stream. Category A installations should apply as a minimum the tiers listed in Annex V.

(ii) Operators may apply a tier one level lower than those referred to in sub paragraph (i) above for Category C installations and up to two levels lower for Category A and B installations with a minimum of tier 1 if the operator can demonstrate to the satisfaction of the competent authority that this is not technically feasible or would lead to unreasonable cost to apply the higher tier. The justification for not applying the higher tier should be recorded when completing the tier table.

(iii) The competent authority may allow an operator to apply even lower tiers than those referred to in the sub paragraph (ii) with a minimum of tier 1 for a transition period of up to three years if the operator can demonstrate to the satisfaction of the competent authority that this is not technically feasible or would lead to unreasonable cost to apply the higher tier and provides an improvement plan detailing how and by when at least the tier referred to in sub paragraph (ii) will be achieved. The improvement plan should be referenced in subsequent table and provided to the competent authority at the time of submission of this plan.

(iv) For minor source streams operators shall apply the highest tier which is technically feasible and will not lead to unreasonable costs with a minimum of tier 1 for activity data and each calculation factor. For de-minimis source streams operators may use conservative estimations rather than tiers unless a defined tier can be achieved without additional effort (MRR Article 26(2)).

(v) Installations with low emissions as identified in section 6(d) may apply as a minimum tier 1 for determining activity data and calculation factors for all source streams unless higher accuracy is achievable without additional effort.

* Note 1: For commercial standard fuels the minimum tiers listed in Annex V of the MRR may be applied for all activities in all installations.

* Note 2: If you are intending to apply a fall-back approach please complete the table below and select "n/a" for the tiers to be applied for each source stream where a fall-back approach is used. Section 10 "Fall-back" must also be completed for these source streams.

* Note 3: For biomass or mixed fuels the emission factor is the preliminary emission factor as defined in Definition 35 Article 3 of the MRR.

Source Stream Refs.	Emission Source Refs.	Measurement Device Refs.	Overall Metering Uncertainty (less than +/- %)	Applied Monitoring Approach	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied	Estimated Emissions tCO _{2(e)}	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
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Source Stream Refs.	Emission Source Refs.	Measurement Device Refs.	Overall Metering Uncertainty (less than +/- %)	Applied Monitoring Approach	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied	Estimated Emissions tCO _{2(e)}	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
F1 (Natural Gas)	S1-1,S2,S3,S4,S5, S1-2,S13,S14,S15-1,S15-2	M1 (Serial # 83038950),M2 (Serial # 80088175-2009), M3 (Serial # 80088176-2009)	<1.5%	Standard	4	3	3	N/A	1	N/A	N/A	68000	99.51	Major	Yes	n/a	n/a
F2 (Gas Oil)	S8	Stock take,M7	<5.0%	Standard	2	2a	2a	N/A	1	N/A	N/A	270	0.4	De-minimis	Yes	n/a	n/a
F3 (Kerosene)	S19,S20,S7,S9	M6,Stock take kero tank admin, Stock	<5.0%	Standard	2	2a	2a	N/A	1	N/A	N/A	65	0.1	De-minimis	Yes	n/a	n/a

Source Stream Refs.	Emission Source Refs.	Measurement Device Refs.	Overall Metering Uncertainty (less than +/- %)	Applied Monitoring Approach	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied	Estimated Emissions tCO _{2(e)}	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
		take - Kerosene															
F4 (Propane)	S2,S3,S4,S5,S1-2	Stock transfer	N/A	Standard	No tier	2a	2a	N/A	1	N/A	N/A	1	0	De-minimis	Yes	n/a	n/a
F5 (Petrol)	S16	log book	N/A	Standard	No tier	1	1	N/A	1	N/A	N/A	0.1	0	De-minimis	Yes	n/a	n/a
F6 (Acetylene)	S17	Stock transfer acetylene	N/A	Standard	No tier	1	1	N/A	1	N/A	N/A	0.1	0	De-minimis	Yes	n/a	n/a
F7 (LPG)	S18	Stock transfers Butane	N/A	Standard	No tier	2a	2a	N/A	1	N/A	N/A	0.1	0	De-minimis	Yes	n/a	n/a

Total Estimated Emissions for Calculation (tonnes CO_{2(e)})

68336.3

u. Uncertainty Calculations

The table below lists evidence attached to the application that demonstrates compliance with the applied tiers in accordance with Article 12 of the MRR.

Attachment	Description
Drumbannon 1 2 3 Jan 2012.pdf	meter calibration
Drumbannon Gas Metering System Summary, 24-Jan-2012.pdf	meter calibration
Metering Uncertainty Calculations GHG015.pdf	Natural gas meter uncertainty assessment.
wbridge cal.pdf	Calibration Cert of B.Boro weighbridge

v. Applied tiers

Applied tiers for each source stream

Source Stream Ref.	Emission Source Refs.	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied
F1 (Natural Gas)	S1-1,S2,S3,S4,S5,S1-2,S13,S14,S15-1,S15-2	4	3	3	N/A	1	N/A	N/A
F2 (Gas Oil)	S8	2	2a	2a	N/A	1	N/A	N/A
F3 (Kerosene)	S19,S20,S7,S9	2	2a	2a	N/A	1	N/A	N/A
F4 (Propane)	S2,S3,S4,S5,S1-2	No tier	2a	2a	N/A	1	N/A	N/A
F5 (Petrol)	S16	No tier	1	1	N/A	1	N/A	N/A
F6 (Acetylene)	S17	No tier	1	1	N/A	1	N/A	N/A
F7 (LPG)	S18	No tier	2a	2a	N/A	1	N/A	N/A

w. Justification for Applied tiers

Justifications for the applied tiers for each major source stream where highest tiers are not currently achieved.

Source Stream Ref.	Emission Source Refs.	Justification for the applied tier	Improvement Plan Reference (where applicable)
N/A	N/A	N/A	N/A

10. Calculation Factors

x. Default Values

The table below lists, for each parameter, where default values are to be used for calculation factors.

Source Stream Refs.	Emission Source Refs.	Parameter	Reference Source	Default Value applied (where appropriate)
F1 (Natural Gas)	S1-1,S2,S3,S4,S5,S13,S14,S15-1,S15-2	OxF	As published by the EPA - Greenhouse Gas Factors	N/A
F2 (Gas Oil)	S8	NCV, EF & OxF	As published by the EPA - Greenhouse Gas Factors	N/A
F4 (Propane)	S2,S3,S4,S5,S1-2	NCV, EF & OxF	As published by the EPA - Greenhouse Gas Factors	N/A
F5 (Petrol)	S16	NCV, EF & OxF	As published by the EPA - Greenhouse Gas Factors	n/a
F6 (Acetylene)	S17	NCV, EF & OxF	As published by the EPA - Greenhouse Gas Factors	n/a
F7 (LPG)	S18	NCV, EF & OxF	As published by the EPA - Greenhouse Gas Factors	n/a
F3 (Kerosene)	S19,S20,S7,S9	NCV, EF & OxF	As published by the EPA - Greenhouse Gas Factors	n/a

Sampling and Analysis

Do you undertake sampling and analysis of any of the parameters used in the calculation of your CO₂ emissions? Yes

y. Analysis

The table below lists, for each source stream, where calculation factors are to be determined by analysis.

Source Stream Refs.	Emission Source Refs.	Parameter	Method of Analysis	Frequency	Laboratory Name	Laboratory ISO17025 Accredited	Evidence Reference
F1 (Natural Gas)	S1-1,S2,S3,S4,S5,S1-2,S13,S14,S15-1,S15-2	NCV, EF, CC	Gas Chromatography	Continuous	Effectech	Yes	n/a

Detail about the written procedures for the above analysis.

Where a number of procedures are used details of an overarching procedure which covers the quality assurance of analyses methods and links together individual analytical methods is listed.

Title of procedure	Gas Quality Measurement System Audit
Reference for procedure	Newstownstalaban AGI Audit Report
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The relevant EN standards EN ISO 10723:2012 (Natural Gas performance evaluation for analytical systems and EN ISO 6976:2005 (Natural Gas calculation of Wobbe-index are applied. The relevant EN/ISO standard for the determination of composition defined uncertainty by gas chromatography are also detailed.
Post or department responsible for the procedure and for any data generated	Gas Networks Ireland
Location where records are kept	Environmental Managers Office/Drive
Name of IT system used	H Drive
List of EN or other standards applied	ISO 10723 2015, ISO 6976:2005, ISO/IEC 17025,

z. Sampling Plan

Details about the procedure covering the sampling plan for the analysis table above.

The procedure below covers the elements of a sampling plan as required by Article 33 of the MRR. Where a number of procedures are used, details of an overarching procedure which covers the sampling methods and links together individual sampling methods are listed.

Attachment	Description
effectech cerification.pdf	ISO 17025 calibration certificate
effectech confirmation.pdf	confirmation of effectech calibration service
Drumbannon Metering Summary 2018.pdf	chromatograph sampling frequency

Title of procedure	RMG 9000 methodolgy
Reference for procedure	RMG GC 9000 info
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	At the heart of the gas chromatograph lies a capillary tube, what is called the column. This capillary tube, which is lined with a specific silicone material, serves to separate the individual components of a gas mixture. The column is continuously swept with helium, which is used as the carrier gas for the transport through the

column. For analytical purposes, a precisely metered quantity of natural gas is injected into the helium flow at the inlet of the column. On their way through the column, the molecules of the natural gas components hit the column lining and are retained there for a short time (adsorption). Since the molecules of the various gas components are retained on the wall for different periods of time, the individual components leave the column at different times. Therefore, the gas components can be identified by these times.

Each time a gas component leaves the column, the thermal conductivity of the gas changes, which is measured by the detector.

From this change, the volume content of the gas component

concerned can be calculated.

In order to ensure constant accuracy, the gas chromatograph

is automatically calibrated at regular intervals. For

this purpose, a gas mixture of which the composition is

known is analyzed.

Post or department responsible for the procedure and for any data generated

GNI

Location where records are kept

GNI & Environmental Manager Drive

Name of IT system used

H Drive

List of EN or other standards applied

ISO 17025.

ISO 9001.

aa. Sampling Plan Appropriateness

The procedure to be used to revise the appropriateness of the sampling plan.

Title of procedure	Gas Quality Measurement system audit
Reference for procedure	Newtownstalaban AGI Audit Report
Diagram reference	n/a
Brief description of procedure. The description should cover the essential parameters and operations performed	ISO 10723:2012 (natural gas performance evaluation of on line analytical systems) & ISO 6976:2005 (natural gas calculation of calorific value, density and Wobbe index) are applied
Post or department responsible for the procedure and for any data generated	GNI
Location where records are kept	Environmental Manager Drive
Name of IT system used	H Drive
List of EN or other standards applied	N/A

Are stock estimates carried out as part of the emission calculations? Yes

bb. Year-end reconciliations

The procedure to be used to estimate stocks at the beginning/end of a reporting period where applicable. This should include any source streams monitored using batch metering e.g. where invoices are used.

Title of procedure	Emissions Trading Monitoring and reporting Procedure
Reference for procedure	EM 22
Diagram reference	N/A
Brief description of procedure.	Procedure Outlines procedure for monitoring and reporting annual CO2 emissions, including gathering of activity data and calculation procedure.
Post or department responsible for the procedure and for any data generated	Environmental Manager
Location where records are kept	H Drive
Name of IT system used	Q-pulse
List of EN or other standards applied	ISO 14001:15

cc. Tracking Instruments

The procedure used to keep track of instruments installed in the installation used for determining activity data.

Title of procedure	N/A
Reference for procedure	N/A
Diagram reference	N/A
Brief description of procedure.	N/A
Post or department responsible for the procedure and for any data generated	N/A
Location where records are kept	N/A
Name of IT system used	N/A
List of EN or other standards applied	N/A

11. Management

dd. Monitoring and Reporting Responsibilities

Responsibilities for monitoring and reporting emissions from the installation are listed below:

Relevant job titles/posts and provide a succinct summary of their role relevant to monitoring and reporting are listed below.

Job Title / Post	Responsibilities
Environmental Manager	Operation and maintenance of the site EMS including responsibility for administration and reporting of ghg emissions.

Attachment	Description
N/A	N/A

ee. Assignment of Responsibilities

Details of the procedure used for managing the assignment of responsibilities for monitoring and reporting within the installation and for managing the competencies of responsible personnel in accordance with Article 58(3)(c) of the MRR:

This procedure identifies how the monitoring and reporting responsibilities for the roles identified above are assigned and how training and reviews are undertaken.

Title of procedure	GHG Emissions monitoring and reporting
Reference for procedure	EM22
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	EM22 designates the roles and responsibilities for all aspects of the monitoring and reporting of the ghg emissions on the site; specifically to manage the assignment of responsibilities for monitoring and reporting within the installation and for managing the competencies of responsible personnel in accordance with Article 58(3)(c) of the MRR. The procedure identifies how the monitoring and reporting responsibilities for the roles identified above are assigned and how training and reviews are undertaken.
Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Environmental Manager's Office
Name of IT system used	N/A
List of EN or other standards applied	ISO 14001:2004

ff. Monitoring Plan Appropriateness

Details of the procedure used for regular evaluation of the monitoring plan's appropriateness covering in particular any potential measures for the improvement of the monitoring methodology:

Title of procedure	GHG Emissions monitoring and reporting
Reference for procedure	EM22
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	EM22 outlines the various source streams on site, it also outlines the method of assessing the emission category of the site, the uncertainty of the activity data and the requirement for improvement. The procedure specifically covers the following;

- checking the list of emissions sources and source streams, ensuring completeness of the emissions and source streams and that all relevant changes in the nature and functioning of the installation will be included in the monitoring plan;
- assessing compliance with the uncertainty thresholds for activity data and other parameters (where applicable) for the applied tiers for each source stream and emission source; and
- assessment of potential measures for improvement of the monitoring methodology applied.

Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Environmental Manager's Office
Name of IT system used	N/A
List of EN or other standards applied	ISO 14001

gg. Data Flow Activities

Details of the procedures used to manage data flow activities in accordance with Article 57 of the MRR:

Title of procedure	GHG Emissions monitoring and reporting
Reference for procedure	EM22
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	EM22 covers all aspects of the collection of relevant activity data and values for calculation of emissions. This procedure will be used manage data flow activities in accordance with Article 57 of the MRR.

Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Environmental Manager's Office
Name of IT system used	N/A
List of EN or other standards applied	ISO 14004
List of primary data sources	Nat Gas invoices. Monthly Gas Analysis Reports

Monthly gas Consumption Reports

Gas oil invoices.

Kerosene invoices.

Propane purchases

Annual stock takes

Stock transfers

Petrol purchase log book

Description of the relevant processing steps for each specific data flow activity.

Identify each step in the data flow and include the formulas and data used to determine emissions from the primary data. Include details of any relevant electronic data processing and storage systems and other inputs (including manual inputs) and confirm how outputs of data flow activities are recorded

Natural Gas:

On a monthly basis the gas analysis and consumption report information is inputted to a spreadsheet and into the gascalc calculation program. The excel spreadsheet and gascalc system calculate the carbon content, inferior calorific value and emission factor of the gas. The formula $CO_2 \text{ (g/scm)} \times M_3 \text{ gas}/1000000 \times O_x \text{ factor} = \text{Tonnes } CO_2$ is used to calculate the emissions from natural gas.

Gas Oil / Kerosene:

The activity data for each year will be calculated using the formula below;

Energy content of fuel consumption [TJ] = fuel consumed [t or m3] * net calorific value of the fuel [TJ/t or TJ/m3]. An Emission Factor and Oxidation Factor will be taken from the EPA website.

Propane/Butane/Petrol/acetylene: The activity data for each year will be calculated using the formula below:

Energy content of fuel consumption [TJ] = fuel consumed [t or m3] * net calorific value of the fuel [TJ/t or TJ/m3].

The monthly CO2 emissions will be calculated using the formula below:

$CO_2 \text{ emissions} = \text{Activity data [TJ/m3]} * \text{Emission Factor [tCO}_2\text{/TJ]} * \text{Oxidation factor}$. The Activity data will be based

on stock transfers from the stores department.

Submit relevant documents to record data flow activities

Attachment	Description
N/A	N/A

hh. Assessing and Controlling Risks

Details of the procedures used to assess inherent risks and control risks in accordance with Article 58 of the MRR:

Title of procedure	GHG Emissions monitoring and reporting
Reference for procedure	EM22
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The procedure will address the assessment of inherent risks and control risks when establishing an effective control system as required by Article 58 of the MRR.

Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Environmental Manager's Office
Name of IT system used	N/A
List of EN or other standards applied	ISO 14001

ii. Quality Assurance of Metering / Measuring Equipment

Details of the procedures used to ensure quality assurance of measuring equipment in accordance with Article 58 and 59 of the MRR.

Title of procedure	GHG Emissions monitoring and reporting
Reference for procedure	EM22
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	This procedure addresses the calibration requirements of all equipment required to be calibrated under the EU ETS Monitoring and Reporting Procedure to ensure quality assurance of measuring equipment in accordance with

Article 58 and 59 of the MRR.

Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Environmental Manager's Office
Name of IT system used	Q pulse
List of EN or other standards applied	ISO 14001

jj. Quality Assurance of Information Technology used for Data Flow Activities

Details of the procedures used to ensure quality assurance of information technology used for data flow activities in accordance with Article 58 and 60 of the MRR:

Title of procedure	N/A It is not necessary to use IT Systems for data flow Reference for data flow.
Reference for procedure	N/A
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	IT is not used to log and track the data, as in the main invoices and physical weighbridge dockets are used. However, the calculations are done by computer and these files and documents are stored in the company's main server and backed up using best practice.

Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Main server/Q pluse
Name of IT system used	N/A
List of EN or other standards applied	ISO 14001

kk. Review and Validation of Data

Details of the procedures used to ensure regular internal reviews and validation of data in accordance with Articles 58 and 62 of the MRR.

Title of procedure	Internal Auditing Procedure
Reference for procedure	EM20
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The procedure provides for the review and validation of data to ensure that there are regular internal reviews and validation of data in accordance with Articles 58 and 62 of the MRR. It looks at comparisons with data over previous

years, comparison of fuel consumption reported with purchase records and factor obtained for fuel suppliers with international reference factors, if applicable, and criteria for rejecting data.

Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Environmental Manager's Office
Name of IT system used	Q pulse
List of EN or other standards applied	ISO 14001

II. Corrections and Corrective Actions

Details of the procedures used to handle corrections and corrective actions in accordance with Articles 58 and 63 of the MRR:

Title of procedure	Non Conformity, Corrective and preventative action procedure
Reference for procedure	EM18
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	EM18 outlines the roles, responsibilities and methodology for implementing corrective and preventative actions when non conformances are observed in the GHG monitoring procedures. This procedure addresses all corrective actions required within the Environmental Management system and includes those required under the EU ETS Monitoring and Reporting requirements to to handle corrections and corrective actions in accordance with Articles 58 and 63 of the MRR.

Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Environmental Manager's Office
Name of IT system used	Q pulse
List of EN or other standards applied	ISO 14001

mm. Control of Outsourced Activities

Details of the procedures used to control outsourced processes in accordance with Articles 59 and 64 of the MRR.

Title of procedure	EM 22
Reference for procedure	N/A
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The procedure includes methods for controlling outsourced activities relating to EU ETS such as supplier metering and calibration in accordance with Articles 59 and 64 of the MRR.

Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Environmental Managers Office
Name of IT system used	Q pulse
List of EN or other standards applied	ISO 14001

nn. Record Keeping and Documentation

Details of the procedures used to manage record keeping and documentation:

Title of procedure	Document control procedure
Reference for procedure	EP007
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The document control procedure outlines the methodology for maintaining environmental procedures and for the retention of all relevant records. This procedure provides for the location and retention of all records stipulated in annex IX of the MRR for at least 10 years.

Post or department responsible for the procedure and for any data generated	Environmental Department
Location where records are kept	Environmental Manager's Office
Name of IT system used	Q pulse
List of EN or other standards applied	ISO 14001

oo. Risk Assessment

The results of a risk assessment that demonstrates that the control activities and procedures are commensurate with the risks identified:

Attachment	Description
Risk Assessment of monitoring and reporting Data.docx	Updated Risk Assessment
Risk Assessment of monitoring and reporting Data.pdf	reviewed assessment

pp. Environmental Management System

Does your organisation have a documented Environmental Management System? Yes

Is the Environmental Management System certified by an accredited organisation? Yes

The standard to which the Environmental Management System is certified: ISO 14001

12. Changes in Operation

qq. Changes in Operation

Article 24(1) of Commission Decision 2011/278/EC requires that Member States must ensure that all relevant information about any planned or effective changes to the capacity activity level and operation of an installation is submitted by the operator to the competent authority by 31 December each year. Article 12(3) of the MRR further provides that Member States may require information to be included in the monitoring plan of an installation for the purposes of meeting these requirements.

Details of the procedure used to ensure regular reviews are carried out to identify any planned or effective changes to the capacity activity level and operation of the installation that have an impact on the installation's allocation:

The procedure specified below cover the following:

- planning and carrying out regular checks to determine whether any planned or effective changes to the capacity activity level and operation of an installation are relevant under Commission Decision 2011/278/EC; and
- Procedures to ensure such information is submitted to the competent authority by 31 December of each year.

Title of procedure	GHG Emissions monitoring and reporting
Reference for procedure	EM22
Diagram reference	N/A
Brief description of procedure. The description should	EM22 outlines the requirement to monitor the activity

cover the essential parameters and operations performed levels on site and inform the competent authority of any changes in capacity, activity level and operation of an installation are relevant under Commission Decision 2011/278/EC. Also the procedure provides for effective reporting to the Competent Authority each year by 31 December.

Post or department responsible for the procedure and for any data generated Environmental Department
 Location where records are kept Environmental Manager's Office
 Name of IT system used Qpulse

13. Abbreviations

rr. Abbreviations Acronyms or definitions

Abbreviations acronyms or definitions that have been used in this monitoring plan:

Abbreviation	Definition
MGO	Marked gas oil
Kero	Kerosene (non aviation)

14. Additional Information

Any other information:

Attachment	Description
FW_ CHP Unit.pdf	Email confirming thermal input of the CHP/Waste Boiler
EGP-3466-9.pdf	CHP turbine details
Extract Pages From DKIIIE-1-Units and Components - 201834-BAILIEBORO-R0.pdf	Waste heat boiler details
SKMBT_C35313082909380.pdf	CRO for Bailieboro Foods Limited
Company structure.pdf	Letter outlining the company structure.
03-13657-1 Duct burner.pdf	Waste Heat Boiler 2 Spec

Attachment	Description
Centrax Performance 4902-1.pdf	Gas Turbine 2 Spec
Drumbannon Gas Metering System Summary, 21-Jan-2014.pdf	Gas Meters Calibration
Drumbannon Calibration Sheet 2014.pdf	gas meter calibration sheets
CHP 2 Installed capacity.pdf	Details of CHP 2 and waste heat boiler
drier 3 air heater.pdf	Details of drier 3
drier2 heater name plate.JPG	Details (plate) of drier 2
Rev D 17.001.200 - Greenhouse Gas Emissions (18.01.18).pdf	Revised site map
Gas metering ID and Serial numbers.pdf	2018 Gas metering ID and Serial numbers
Bailieboro Nat Gas Calcs.xlsx	Tier 3 NCV and EF Natural Gas Calcs
S16 S17 S18 S19 S20 Specs.docx	Specs for S16, S17, S18, S19, S20
S10 evidence of removal. pdf.pdf	S10 evidence of removal
S12 evidence of decomm.JPG	S12 evidence of decomm
2018 GNI Drumbannon Metering Summary.pdf	2018 GNI Summary
2018 GNI Drumbannon Calibration Sheet.pdf	2018 GNI Calibration
08012019 Log of changes bboro site.xlsx	2018 Log of changes
S11 Scrap Docket.pdf	S11 scrap docket
2018 Bailieboro Nat Gas Calcs.xlsx	Sample Tier 3 NG Calculations
EM 22 Procedure for GHG Emissions Monitoring and Reporting.doc	Procedure for GHG Emissions Monitoring and Reporting

15. Confidentiality

ss. Confidentiality Statement

It is the Environmental Protection Agency's policy to make information received by it in the course of its work open to inspection by any person on request. This is in accordance with the provisions of the European Communities (Access to Information on the Environment) Regulations 2007 to 2011.

In the event that you considered that some of the information being submitted of a confidential nature, then the nature of this information and the reasons why it should be considered confidential, with reference to the European Communities (Access to Information on the Environment) Regulations 2007 to 2011 and any amendments must be explicitly requested using the facility below. The Board of the Environmental Protection Agency will consider the requests and if the information can be deemed as confidential and necessary.

Notwithstanding any request for confidentiality, the Environmental Protection Agency explicitly reserves the right to release data to the Commission, including emissions and allocations to the public, on the basis that the data will be used for the purposes foreseen in Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.

Please tick this box if you consider that any part of your form should be treated as commercially confidential/sensitive: false

END of Appendix I.