

Headquarters, Johnstown Castle Estate, County Wexford, Ireland

GREENHOUSE GAS EMISSIONS PERMIT

Permit Register Number:	IE-GHG031-10358-3
Operator:	Lakeland Dairies Co-Operative Society Limited Church Street Killeshandra Cavan

Installation Name: Killeshandra Site

Site Name: Killeshandra Site

Location: Church Street

Killeshandra

Cavan 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 Nº IE-GHG031-10358.

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 <u>ETSWAP</u>.

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

P0800-03

Status Log

Current Permit

Permit number	Date application received	Date Permit issued	Comment
IE-GHG031-10358-3	08 March 2018	10 January 2019	1. Four new emission sources (S8 IT Generator, S9 Cutting Device, S10 Bunsen Burners and S11 Domestic Boiler) and corresponding emission points (A5-1, A6-1, A7-1 and A8-1) were installed in 2017.
			2. Three new source streams were added (F4 Acetylene, F5 Butane and F6 Kerosene).
			3. The Total Capacity has increased from 23.74 to 23.93 MW.

Previous Permits

Permit number	Change Type	Date application received	Date Permit issued	Comment
IE-GHG031- 10358-1	GHG Permit Application	24 September 2013	30 October 2013	
IE-GHG031- 10358-2	GHG Variation	26 March 2015	10 July 2015	 Addition of new minor generator (S7) operating on gas oil. Update of IED to P08000-03.

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.

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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

Company Registration Number: Reg of Friendly Soc 4622 R

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)

at the following installation(s):

Killeshandra Site Installation number: 27

located at

Church Street Killeshandra Cavan 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.: 27

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
S1	Boiler No.1	10.9	MW
S2	Boiler No.2	9.81	MW
\$3	Casein Plant LPG Burner No.1	0.95	MW
S4	Casein Plant LPG Burner No.2	0.95	MW
S5	Casein Plant LPG Burner No.3	0.95	MW
S6	Domestic Gas Burner	0.12	MW
S7	Lactose Plant Generator	0.06	MW

Emission Source Reference	Emission Source Description	Capacity	Capacity Units
S8	IT Generator	0.12	MW
S 9	Cutting Device	0.01	MW
S10	Bunsen Burner	0.01	MW
S11	Domestic Boiler	0.05	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.
- 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

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 10 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-GHG031-10358

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 nameKilleshandra Site

Site name Killeshandra Site

Address Church Street

Killeshandra Cavan Ireland

Grid reference of site main entrance E230803, N307428

Licence held pursuant to the Environmental Protection Yes Agency Act 1992, as amended.

IPC/IE Licence Register Number	Licence holder	Competent body
P0800-03	Lakeland Dairies Co-operative Society Limited	Environmental Protection Agency

Has the regulated activity commenced at Yes the Installation?

Date of Regulated Activity commencement 01 January 2005

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 Reg of Friendly Soc 4622 R

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 No name?

Registered office address

Address Line 1 Church Street
Address Line 2 N/A

City/Town Killeshandra
County Cavan
Postcode N/A

Principal office address

Is the principal office address different to the registered No office address?

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

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 Church Street Killeshandra

Cavan Ireland

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 Killeshandra Site is a Dairy Processing Site.

The main processing activities on site are:

- The Casein Plant and associated Whey Processing Plants
- Lactose Plant
- Mini-Butter Plant
- Ultra High Temperature (UHT) Plant
- Ice-cream Plant

There are two boilers on site and these are located in a designated boiler house. The main fuel used on site is Heavy Fuel Oil (HFO) although the two boilers can also operate using tallow. Tallow has not been used on site for approximately 12 years. Any tallow to be used (biomass) will be sourced from a source meeting the criteria set out in Article 17(1) of the RES-D. Consequently, the sustainability criteria must be applied for biofuels and bioliquids that are consumed and zero-rated for greenhouse gas emissions.

The boilers (capacity 10.9 and 9.81MW respectively) provide steam to the individual processing plants as required. There are also three Casein Gas Burners on site which use LPG as a fuel source.

There are also two small generators on site the Lactose Plant generator and the IT generator.

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)	23.93	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
12.123.320 Rev A - EU ETS Monitoring & Report Plan- Noise Monitoring Points.pdf	Drawing of Emission Points
2018 Site Map EU ETS Drawing.pdf	2018 Site Drawing

i. Estimated Annual Emissions

Detail of the estimated annual emission of CO_2 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 CO_2 excluding CO_2 from biomass.

Estimated Annual Emissions (tonnes CO_{2(e)}) 12500

Installation Category: A

6. Emissions Details

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	Boiler No.1
S2	Boiler No.2
S3	Casein Plant LPG Burner No.1
54	Casein Plant LPG Burner No.2
S5	Casein Plant LPG Burner No.3
S6	Domestic Gas Burner
WWTP	Wastewater Treatment Plant
S7	Lactose Plant Generator
58	IT Generator
59	Cutting Device
S10	Bunsen Burner
S11	Domestic Boiler

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

Emission Source Reference	Emission Source Description
S1	Boiler No.1
S2	Boiler No.2
S3	Casein Plant LPG Burner No.1
S4	Casein Plant LPG Burner No.2
S5	Casein Plant LPG Burner No.3
S6	Domestic Gas Burner
S7	Lactose Plant Generator
S8	IT Generator
S9	Cutting Device
S10	Bunsen Burner
S11	Domestic Boiler

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
A1-1	Boilers No.1 & 2 Stack
A2-1	Casein Plant LPG Burner No.1 Stack
A2-2	Casein Plant LPG Burner No.2 Stack
A2-3	Casein Plant LPG Burner No.3 Stack
A3-1	Sime Euromat Gas Burner Flue
WWTP-1	Wastewater Treatment Plant
A4-1	Lactose Plant Generator
A5-1	IT Generator
A6-1	Cutting Device
A7-1	Bunsen Burner
A8-1	Domestic Boiler

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 HFO	Combustion: Other gaseous & liquid fuels	Heavy Fuel Oil
F2 LPG	Combustion: Other gaseous & liquid fuels	Liquefied Petroleum Gases
M1 Tallow	Combustion: Other gaseous & liquid fuels	Tallow
F3 Diesel Oil	Combustion: Commercial standard fuels	Gas/Diesel Oil
F4 Acetylene	Combustion: Other gaseous & liquid fuels	Acetylene
F5 Butane	Combustion: Commercial standard fuels	Butane
F6 Kerosene	Combustion: Commercial standard fuels	Kerosene (other than jet kerosene)

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 HFO	S1,S2	A1-1	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 LPG	S3,S4,S5,S6	A2-1,A2-2,A2-3,A3-1	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)
M1 Tallow	S1,S2	A1-1	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)
F3 Diesel Oil	S7,S8	A4-1,A5-1	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 Acetylene	S9	A6-1	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 Butane	S10	A7-1	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 Kerosene	S11	A8-1	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)

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?

Detail of these activities:

Source Stream Refs	Emission Source Ref	Emission Point Ref		
n/a	WWTP	WWTP-1		

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 Yes with low emissions (as defined by Article 47 of the MRR)?

If the installation is an installation with low emissions as defined above there are a number of special provisions which may be applied to provide a simplified monitoring plan. These provisions are set out in Article 47 of the MRR.

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 N₂O	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:

HFO:

Tonnages of Carbon Dioxide due to the Combustion of HFO is calculated as follows:

- -Tonnes of CO2e = kt of HFO x NCV(TJ/kt) x emission factor (tCO2/TJ) x oxidation factor.
- -Usage of HFO in kt is calculated using the following formula:Opening Stock + Purchases of HFO Closing Stock of HFO = Usage of HFO. Density will be from supplier data.
- -Purchase of HFO is determined by the volume of HFO that is delivered, as per invoices, which are based on the weighbridge receipts. Deliveries, Opening and Closing Stocks also converted to kt.

LPG:

Tonnages of Carbon Dioxide due to the combustion of LPG is calculated as follows:

- -Tonnes of CO2e = kt of LPG x NCV(TJ/kt) x emission factor (tCO2/TJ) x oxidation factor.
- -Usage of LPG in kt is calculated using the following formula:Opening Stock + Purchases of LPG Closing Stock of LPG = Usage of LPG.

- -Purchase of LPG is determined by the volume of LPG that is delivered (as per suppliers weighbridge and invoices). Deliveries, Opening and Closing Stocks in litres are also converted to kt using the above formula.
- -Calibration details are obtained from suppliers to ensure that meters are calibrated.
- -Opening and Closing Stock Information is provided by meters on the site and again litres are converted to kt by multiplying the litres of LPG by the density of the LPG.
- -The density of LPG is taken from supplier specifications.

Tallow:

Tallow is treated in exactly the same way as HFO from a calculation point of view. The same tanks are used for storage so the same meters are used for deriving opening and closing stocks. Again the weighbridge is used to determine the weight of tallow delivered to site. The same calculations are used to determine the carbon dioxide output of tallow but this will always be zero as the emission factor will always be zero. GD3 - 'Biomass Issues in EU ETS' has been taken into account when assessing the use of tallow on site. If and when Tallow is used on site it will be tested for NCV and a current sustainability cert will be obtained for Tallow and submitted with the AEM report.

Diesel Oil:

Tonnages of Carbon Dioxide due to the Combustion of Diesel Oil is calculated as follows:

- -Tonnes of CO2e = kt of GO x NCV(TJ/kt) x emission factor (tCO2/TJ) x oxidation factor.
- -Usage of GO in kt is calculated using the following formula:Opening Stock + Purchases of GO Closing Stock of GO = Usage of GO. Density will be from supplier data.
- -Purchase of GO is determined by the volume of Diesel that is delivered, as per invoices, which are based on the weighbridge receipts. Deliveries, Opening and Closing Stocks also converted to kt.

Acetylene:

Tonnages of Acetylene due to the Combustion of Acetylene is calculated as follows:

- -Tonnes of CO2e = kt of Acetylene x NCV(TJ/kt) x emission factor (tCO2/TJ) x oxidation factor.
- -Usage of Acetylene in kt is calculated using the following formula:Purchases of Acetylene = Usage of Acetylene. Density will be from Supplier Data
- -Purchase of Acetylene is determined by the volume of Acetylene that is delivered, as per invoices.

Butane:

Tonnages of Butane due to the Combustion of Acetylene is calculated as follows:

- -Tonnes of CO2e = kt of Butane x NCV(TJ/kt) x emission factor (tCO2/TJ) x oxidation factor.
- -Usage of Butane in kt is calculated using the following formula:Purchases of Butane = Usage of Butane. Density will be from Supplier Data
- -Purchase of Butane is determined by the volume of Butane that is delivered, as per invoices.

Kerosene:

Tonnages of Kerosene due to the Combustion of Kerosene is calculated as follows:

- -Tonnes of CO2e = kt of Kerosene x NCV(TJ/kt) x emission factor (tCO2/TJ) x oxidation factor.
- -Usage of Kerosene in kt is calculated using the following formula: Purchases of Kerosene = Usage of Kerosene. Density will be from Supplier Data
- -Purchase of Kerosene is determined by the volume of Kerosene that is delivered, as per invoices.

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 HFO,M1 Tallow,F3 Diesel Oil	S1,S2,S7,S8	MD1	Weighbridge	25-50000	kg	0.5	Dairy Weighbridge
F1 HFO	S1,S2	MD2	Level gauge	0-7183mm	mm	1.0	HFO Tank x 2
F2 LPG	\$3,\$4,\$5,\$6	MD3	Avery Weighbridge	0-50000	kg	3	Supplier Weighbridge and LPG Tanker
F1 HFO,M1 Tallow	S1,S2	MD4	Rotary meter	0-50000	litres	0.008	Supplier Depot
F4 Acetylene,F5 Butane,F6 Kerosene	S9,S10,S11	MD5	Invoices/Purchases	N/A	N/A	N/A	On-site
F2 LPG	S3,S4,S5,S6	MD6	Level Gauge	1-54000	1	N/A	On-site
F3 Diesel Oil	S7,S8	MD7	Stock take	N/A	N/A	N/A	On-site

Source Stream Refs.	Measurement Device	Determination	Instrument Under	Conditions Of Article	Invoices Used To	Trade Partner And
	Ref.	Method	Control Of	29(1) Satisfied	Determine Amount Of	Operator Independent
					Fuel Or Material	
F1 HFO,M1 Tallow,F3	MD1	Batch	Operator	N/A	N/A	N/A
Diesel Oil						
F1 HFO	MD2	Batch	Operator	N/A	N/A	N/A
F2 LPG	MD3	Batch	Trade partner	Yes	Yes	Yes
F1 HFO,M1 Tallow	MD4	Batch	Trade partner	Yes	Yes	Yes

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
F4 Acetylene,F5	MD5	Batch	Operator	N/A	N/A	N/A
Butane,F6 Kerosene						
F2 LPG	MD6	Batch	Operator	N/A	N/A	N/A
F3 Diesel Oil	MD7	Batch	Operator	N/A	N/A	N/A

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 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.	Emissi on Source Refs.	Measu remen t Device Refs.	Overall Meteri ng Uncert ainty (less than +/- %)	Applie d Monit oring Appro ach	Activit y Data Tier Applie d	Net Calorifi c Value Tier Applie d	Emissi on Factor Tier Applie d	Carbon Conten t Tier Applie d	Oxidat ion Factor Tier Applie d	Conver sion Factor Tier Applie d	Bioma ss Fractio n Tier Applie d	Estima ted Emissi ons tCO _{2(e)}	% of Total Estima ted Emissi ons	Source Catego ry	Highes t Tiers Applie d	Justific ation for not applyi ng the highes t tiers	Improv ement Plan Refere nce (where applica ble)
F1 HFO	S1,S2	MD1, MD2, MD4	<1.5%	Standa rd	4	2a	2a	N/A	1	N/A	N/A	9000	92.72	Major	Yes	n/a	n/a
F2 LPG	\$3,\$4,\$ 5,\$6	MD3, MD6	<5.0%	Standa rd	2	2a	2a	N/A	1	N/A	N/A	700	7.21	Minor	Yes	n/a	n/a
M1 Tallow	S1,S2	MD1	<5.0%	Standa rd	4	1	1	N/A	1	N/A	N/A	0	0	De- minimi s	Yes	n/a	n/a
F3 Diesel Oil	S7,S8	MD1, MD7	<5.0%	Standa rd	2	2a	2a	N/A	1	N/A	N/A	0.13	0	De- minimi s	Yes	n/a	n/a
F4 Acetyl ene	S9	MD5	<5.0%	Standa rd	No tier	1	1	N/A	1	N/A	N/A	0.001	0	De- minimi s	Yes	n/a	n/a
F5 Butane	S10	MD5	<5.0%	Standa rd	No tier	2a	2a	N/A	1	N/A	N/A	0.001	0	De- minimi s	Yes	n/a	n/a
F6 Kerose	S11	MD5	<5.0%	Standa rd	No tier	2a	2a	N/A	1	N/A	N/A	7	0.07	De- minimi	Yes	n/a	n/a

^{*} 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.

Source Stream Refs.	Emissi on Source Refs.	Measu remen t Device Refs.	Overall Meteri ng Uncert ainty (less than +/- %)	Applie d Monit oring Appro ach	Activit y Data Tier Applie d	Net Calorifi c Value Tier Applie d	Emissi on Factor Tier Applie d	Carbon Conten t Tier Applie d	Oxidat ion Factor Tier Applie d	Conver sion Factor Tier Applie d	Bioma ss Fractio n Tier Applie d	Estima ted Emissi ons tCO _{2(e)}	% of Total Estima ted Emissi ons	Source Catego ry	Highes t Tiers Applie d	Justific ation for not applyi ng the highes t tiers	Improv ement Plan Refere nce (where applica ble)
ne														s			

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

u. 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 HFO	S1,S2	4	2a	2a	N/A	1	N/A	N/A
F2 LPG	\$3,\$4,\$5,\$6	2	2a	2a	N/A	1	N/A	N/A
M1 Tallow	S1,S2	4	1	1	N/A	1	N/A	N/A
F3 Diesel Oil	S7,S8	2	2a	2a	N/A	1	N/A	N/A
F4 Acetylene	S9	No tier	1	1	N/A	1	N/A	N/A
F5 Butane	S10	No tier	2a	2a	N/A	1	N/A	N/A
F6 Kerosene	S11	No tier	2a	2a	N/A	1	N/A	N/A

v. 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

w. 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 HFO	S1,S2	NCV, EF & OxF	National Inventory - Ireland's Country Specific Values	n/a
F2 LPG	\$3,\$4,\$5,\$6	NCV, EF & OxF	National Inventory - Ireland's Country Specific Values	n/a
F3 Diesel Oil	S7,S8	NCV, EF & OxF	National Inventory - Ireland's Country Specific Values	n/a
F4 Acetylene	S9	NCV, EF & OxF	National Inventory - Ireland's Country Specific Values	n/a
F5 Butane	S10	NCV, EF & OxF	National Inventory - Ireland's Country Specific Values	n/a
F6 Kerosene	S11	NCV, EF & OxF	National Inventory - Ireland's Country Specific Values	n/a

Sampling and Analysis

Do you undertake sampling and analysis of any of the No parameters used in the calculation of your CO₂ emissions?

11. Management

x. 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	Overall reponsibilty for EU ETS Issues and Reporting on the Site
Maintenance Co-ordinator	Responsibility for Calibration of Measuring and Monitoring Equipment relevant to EU ETS

Attachment	Description
N/A	N/A

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 Emissions Trading Monitoring and Reporting Procedure

Reference for procedure EP 12 Diagram reference N/A

Brief description of procedure. The description should The procedure details all of the requirements for EU ETS cover the essential parameters and operations performed

Monitoring and Reporting 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 Site Manager / Environmental Manager

any data generated

Location where records are kept

Name of IT system used

List of EN or other standards applied

Environmental Manager's Office

N/A

EN:ISO 14001 2004

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 **Emissions Trading Monitoring and Reporting Procedure**

Reference for procedure EP 12 Diagram reference N/A

Brief description of procedure. The description should cover the essential parameters and operations performed The procedure provides for regular evaluation of the Monitoring Plan's appropriateness for operations on the site. 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 Environmental Manager

any data generated

Location where records are kept Environmental Manager's Office

Name of IT system used N/A

List of EN or other standards applied EN ISO 14001:2004

aa. Data Flow Activities

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

Title of procedure Emissions Trading Monitoring and Reporting Procedure

Reference for procedure EP 12
Diagram reference N/A

Brief description of procedure. The description should cover the essential parameters and operations performed

This procedure provides for the management of data flow relating to the EU ETS. 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 Environmental Manager

any data generated

Location where records are kept Envionmental Manager's Office

Name of IT system used N/A

List of EN or other standards applied EN ISO 14001:2004

List of primary data sources Heavy Fuel Oil Invoices/Weighbridge dockets

Heavy Fuel Oil Stock Figures

Diesel Invoices / Weighbridge Dockets & Stocks

LPG Invoices

LPG Stock Figures

Tallow Invoices

Tallow Stock Figures

Weighbridge Dockets

Acetylene, Butane and Kerosene Invoices.

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

For all fuels:

- On a monthly basis, the bills will be reviewed by the Identify each step in the data flow and include the formulas Environmental Manager

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 calculated using the following formula - fuel consumed (in manual inputs) and confirm how outputs of data flow activities are recorded

- The weight of fuel consumed each month will be kgs) /1000/1000 = weight of fuel used in kilo tonnes
- The monthly Carbon dioxide emissions are calculated by multiplying the weight of fuel in kilo tonnes by the net calorific value of the fuel by the emission factor of the fuel by the oxidation factor of the fuel
- Opening and Closing stocks of Fuels of the HFO, LPG and GO Tanks at the start and end of the year.

The annual carbon figures are calculated by adding the opening stock to the annual usage and subtracting the closing stock.

The NCVs of the fuels, the emission factor and oxidation factor will be taken from the EPA Website.

Submit relevant documents to record data flow activities

Attachment	Description
N/A	N/A

bb. 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 Emissions Trading Monitoring and Reporting Procedure

Reference for procedure EP 12 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

Location where records are kept

Environmental Manager's Office

Environmental Manager

Name of IT system used N/A

List of EN or other standards applied EN ISO 14001:2004

cc. 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 **Environmental Calibration Procedure**

Reference for procedure FP 24 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 Environmental Manager

any data generated

Location where records are kept

Environmental Manager's Office

Name of IT system used N/A

List of EN or other standards applied EN ISO 14001:2004

dd. 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 procedure N/A Diagram reference N/A

Brief description of procedure. The description should It is not necessary to use IT Systems for data flow.

cover the essential parameters and operations performed

Post or department responsible for the procedure and for N/A

any data generated

Location where records are kept N/A Name of IT system used N/A

List of EN or other standards applied EN ISO 14001:2004

ee. 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 **Emissions Trading Monitoring and Reporting Procedure**

Reference for procedure EP 12 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 Environmental Manager

any data generated

Location where records are kept Environmental Manager's Office

Name of IT system used N/A

List of EN or other standards applied EN ISo 14001:2004

ff. 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 Action and Preventive Action

Procedure

Reference for procedure FP9 Diagram reference N/A

Brief description of procedure. The description should cover the essential parameters and operations performed 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 Environmental Manager

any data generated

Location where records are kept

Environmental Manager's Office

Name of IT system used N/A

List of EN or other standards applied EN ISO14001:2004

gg. 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 Emissions Trading Monitoring and Reporting Procedure

Reference for procedure EP 12
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 ad 64 of the MRR.

Post or department responsible for the procedure and for Environmental Manager

any data generated

Location where records are kept Environmental Manager's Office

Name of IT system used N/A

List of EN or other standards applied EN ISO 14001:2004

hh. Record Keeping and Documentation

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

Title of procedure Document Control Procedure

Reference for procedure EP 5
Diagram reference N/A

Brief description of procedure. The description should

This

cover the essential parameters and operations performed

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 Environmental Manager

any data generated

Location where records are kept Environmental Manager's Office

Name of IT system used N/A

List of EN or other standards applied EN ISO 14001:2004

ii. Risk Assessment

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

Attachment	Description
N/A	N/A

Environmental Management System

Does your organisation have a documented Environmental Yes Management System?

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

The standard to which the Environmental Management System is certified:

EN ISO 14001:2004

12. Changes in Operation

kk. 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 Reference for procedure Diagram reference Brief description of procedure. The description should cover the essential parameters and operations performed

Emissions Trading Monitoring and Reporting Procedure

EP 12 N/A

The Procedure covers the carrying out of 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.

Also the procedure provides for effective reporting to the

Competent Authority each year before 31 December.

Post or department responsible for the procedure and for Environmental Manager

any data generated

Location where records are kept

Name of IT system used

Environmental Manager's Office

N/A

13. Abbreviations

II. Abbreviations Acronyms or definitions

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

Abbreviation	Definition
HFO	Heavy Fuel Oil
LPG	Liquified Petroleum Gas
NCV	Net Calorific Value
EF	Emissions Factor
OF	Oxidation Factor
CA	Competent Authority
EMS	Environmental Management System

14. Additional Information

Any other information:

Attachment	Description
Meter Calibration Cert - HFO Supplier.pdf	Calibration Cert from HFO Supplier
Weighbridge Calibration - Lakeland Dairies Killeshandra.tif	Weighbridge Calibration Cert 2013
2017 Weighbridge Calibration.pdf	2017 Weighbridge Calibration
MD 2 HFO Tank 1 Calibration.pdf	MD2 HFO Tank 1 Calibration 2018
MD2 HFO Tank 2 Calibration.pdf	MD2 HFO Tank 2 Calibration 2018
MD4 HFO Truck Calibration 2018.pdf	MD4 HFO Truck meter calibration 2018
S11 TIC - Domestic Boiler Manual.pdf	S11 Burner Input/Output Capacity

Attachment	Description
MD3 LPG supplier Weighbridge cert 2018.pdf	LPG Supplier 2018 Weighbridge Cert
MD3 LPG Truck B45 meter certification.jpg	MD3 LPG supplier truck meter cert
S8 Spec Sheet fuel usage.PDF	S8 IT Generator Spec sheet
Thermal Capacity Calcs S8 Generator.xlsx	S8 IT Generator TIC Calculation

15. Confidentiality

mm. 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 false form should be treated as commercially confidential/sensitive:

END of Appendix I.