



# Annual Environmental Report (AER) 2024

Company Name: Electricity Supply Board – Moneypoint  
Generating Station

Licence Number: P0605-4

Address: Killimer, Kilrush, Co. Clare

Class of Activity<sup>1</sup>: Class 2

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<sup>1</sup> See Appendix I

# Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities<sup>2</sup> of large scale industrial (e.g. chemical, food processors, power plants) and waste facilities. Submitting an Annual Environmental Report (AER) is a requirement of all EPA licences.

An AER is a public document. To this end, this format has been developed for industrial and waste licence holders (other than the intensive agriculture sector) to use as a template. This is to assist any member of the public to interpret and understand the environmental performance of the licensed facility.

The AER is a **summary** of environmental information for a given year. It includes:

- Details of the licence holder’s environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility’s activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

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<sup>2</sup> See Appendix I

- 2) Some documents<sup>3</sup> are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

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<sup>3</sup> This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

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## Glossary

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Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
CRAMP	Closure, Restoration and Aftercare Management Plan.
ELRA	Environmental Liability Risk Assessment.
Emission Limit Value	Limits set for specified emissions, typically outlined in Schedule B of an EPA licence.
EMS	Environmental Management System.
Environmental Goal	An objective or target set by a licensee as part of an environmental management system (EMS).
Environmental Pollutant	Substance or material that due to its quantity and/or nature has a negative impact on the environment.
Facility	Any site or premises that holds an EPA industrial or waste licence.
FP	Financial Provision.
GJ	Giga joules, an international unit of energy measurement.
Groundwater	All water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.
Incident	As defined by an EPA industrial or waste licence.

Inert Waste	Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health.
List of Wastes (LoW)	A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU.
Noise Sensitive Location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Non-Renewable Resource	A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas.
Oil Separator	Separator system for light liquids (e.g. oil and petrol).
PRTR	Pollutant Release and Transfer Register.
Renewable Resource	Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.
Sanitary Waste	Wastewater from toilet, washroom and canteen facilities.
Storm Water	Rainwater run-off from roof and non-process areas.

Surface Water	Lakes, rivers, streams, estuaries and coastal waters.
Trigger Level	A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder.
Volatile Organic Compounds	Gases produced from solids or liquids that evaporate readily in ambient conditions.
Waste	Any substance or object which the holder discards or intends or is required to discard.

#### Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

## Declaration

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I, Irene Power, Health, Safety, Environment & Quality (HSEQ) Specialist, confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

**Tick here**



## 1) Introduction

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See below a brief description of our facility and a summary of our environmental performance this year.

Moneypoint Generating Station is part of the ESB Generation & Trading Business Unit. The Moneypoint Generating Station's environmental management system applies to the generation of approximately 855 megawatts of electricity produced from the steam generation plant burning coal and/or heavy fuel oil.

For our air emissions Continuous Emissions Monitoring Systems are installed on all three boilers. For the other emissions, for example surface water emissions or dust deposition, monitoring stations are located throughout the site. These demonstrate that the operation of Moneypoint does not have a significant impact on the environment.

Ash as combustion by-product is deposited in the Moneypoint Generating Station Ash Storage Area (ASA) whilst FGD (Flue Gas Desulphurisation) by-product from SO<sub>2</sub> abatement is deposited in the Moneypoint FGD Landfill.

Moneypoint is committed to protection of the environment and is accredited to ISO14001 for environmental management systems.

There were no significant structural changes to the site throughout the course of the year.

There was a decrease in electricity generation at the station in 2024 compared to 2023 due to a major outage on Unit 3 from September 2024 to 2025 and reduced demand.

## Contact Us

If you have any questions or would like further information on any aspect of this report, please contact us directly.

See below details:

Electricity Supply Board  
Moneypoint Generating Station  
Killimer, Kilrush  
Co. Clare  
V15 R963  
[www.esb.ie](http://www.esb.ie)

## 2) How we Manage our Facility

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### **Explanation**

To ensure our facility's activities do not cause environmental pollution we are required to have detailed documentation systems in place to help us manage and track our environmental performance. These systems are referred to as Environmental Management Systems (EMS). We review our EMS every year and set up-to-date **environmental goals** to continually improve our environmental performance.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

**Table 1 Environmental Goals**

<b>Environmental Goal</b>	<b>Target Date</b>	<b>Progress</b>
Moneypoint will continue to heighten awareness of the station's environmental obligations and performance. Environmental topics to be included in all key station communications.	Dec 2025	Continuous  Staff made aware of ongoing works, projects, environmental performance and key requirements through monthly briefings to station staff.
Enhance the awareness of License requirements to, Mgmt. team, work organisation team and team leaders to ensure station is run with consideration of the license	Dec 2025	Continuous  Environmental requirements and changes communicated to site management through

		monthly briefings and management meetings.
5 year plan - develop a comprehensive plan to take account of the future of the site, including alternative energy generation, repurposing of landfills, green Atlantic project	Dec 2025	Continuous  HFO conversion and technical amendment B licence requirements on target

Complete drainage testing and upgrades	Dec 2025	2024 works complete. 2025 programme of works in progress
Complete agreed interceptor upgrades programme	May 2024	Complete  Interceptors now commissioned and operational
Get ASA and FGD Landfill Operational plans approved by the EPA	Dec 2025	ASA Landfill Operational Plan updated. Awaiting EoW approval for ash recovery prior to requesting approval of update to landfill operational plan. FGD landfill operational plan update in progress. Assessment underway into landfilling ratio changes.
Get NSAI approval for ash	Dec 2026	NSAI certification put on hold due to HFO/ Green Atlantic at Moneypoint project plans. To be progressed once confirmation received that

		it conforms with project plans.
Ensure 100% of Audits are completed in 2024, HSEQ and Environmental Coordinator to assist Auditors to ensure comprehensive audit takes place	Dec 2025	Complete in 2024.  Objective to be maintained in 2025
Develop waste segregation awareness on site	Dec 2026	Work has commenced and suitable options are being scoped out.
Investigate water saving opportunities and develop a plan for implementation	Ongoing	Investigation into improvement of water recycling system underway. Assessment of water quality for reuse completed.
Develop a site-specific sustainability programme for Moneypoint	Ongoing	New Sustainability team set up and suitable options being scoped out, budget allocation underway.
Environmental training with Staff	Ongoing	Ongoing on continuous basis. Overhaul of training presentation completed in 2024. Rolling out throughout 2025.
Ensure environmental compliance maintained throughout HFO conversion project	Ongoing	Weekly meeting held with ESB environmental stakeholders to ensure all project progression incorporates environmental compliance.

Add rows as necessary

## Comment

The site is accredited to ISO14001 for Environmental Management Systems (EMS). Two surveillance audits were completed in 2024.

## 3) Energy & Water

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### Energy

#### Explanation

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

**Table 2 Energy Used**

Energy Used (GJ)	Quantity	% Increase/ decrease on previous year
Electricity	274342.88	22% increase
Heavy Fuel Oil	5237269.538	171% Increase
Light Fuel Oil	90358.90894	66% Increase
Natural Gas	0	N/a
Coal / Solid Fuel	171838.8	49% Decrease
Peat	0	N/a
Renewable Biomass	0	N/a
Renewable Energy Generated On-site	0*	N/a
<b>Total Energy Used</b>	<b>12362122</b>	<b>20 % Decrease</b>

## Comment

Increase in electricity consumed from Synchronys condenser and reduced station running.

Decrease in consumption of coal due to reduced demand and major outages in Q3 & Q4.

Increase in heavy fuel oil consumption due to increased demand on unit 2.

Increase in light fuel oil consumption due to decreased continuous running of units and increased startups.

Overall decrease in total energy use due to reduction in coal consumption by 49%.

\*Renewable energy generated on site is not consumed by the site and is exported to the grid. Please see next section.

The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

**Table 3 Energy Generated**

<b>Energy Generated (GJ)</b>	<b>Quantity</b>	<b>% Increase/ decrease on previous year</b>
Renewable Energy	171838.8	8.13% Decrease
Fossil Fuels	4376232	19.89% Decrease
Total Energy Generated	4548071	19.50% Decrease

**Comment**

Decrease in generation from fossil fuels due to reduced demand from Eirgrid, unit 3 major outage ran from September 2024 to January 2025. Decrease in Renewable Generation due to lower wind speeds.

## Water

### Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

**Table 4 Water Used**

<b>Source of Water Used</b>	<b>Quantity (m<sup>3</sup>/year)</b>	<b>% Increase/ decrease on previous year</b>
<b>Groundwater</b>	0	0
<b>Surface Water</b>	See comment	0
<b>Public Supply</b>	833210	23% Decrease
<b>Recycled Water</b>	0	0
<b>Rainwater</b>	0	0
<b>Total Water Used</b>	833210	23% decrease

### Comment

Decrease in water consumption due to repairs completed on supply lines and decreased running.

## 4) Environmental Complaints

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### **Explanation**

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us<sup>4</sup> directly. You can also contact the EPA<sup>5</sup> if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

**Table 5 Summary of All Environmental Complaints Received in**

<b>Type of Complaint</b>	<b>Number of Complaints Received</b>	<b>Number Closed</b>
<b>Odour / Smells</b>	0	0
<b>Noise</b>	1	1
<b>Dust</b>	0	0
<b>Water Quality</b>	0	0
<b>Air Quality</b>	0	0
<b>Waste</b>	0	0
<b>Litter</b>	0	0
<b>Vermin/Flies/Birds</b>	0	0
<b>Soil Contamination</b>	0	0
<b>Vibration</b>	0	0
<b>Other</b>	0	0

<sup>4</sup> See Section 1, Introduction – Contact Us

<sup>5</sup> If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

## Comment

One complaint reported on Eden in relation to noise in 2024 on 09 July, follow up completed and complaint closed on Eden.

## 5) Environmental Incidents

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### **Explanation**

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.

**Table 6      Number of Environmental Incidents**

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Abatement Equipment Offline	13	0	0	0	0
Breach of Ambient ELV	0	0	0	0	0
Breach of Emission Limit	1	0	0	0	0
Explosion	0	0	0	0	0
Fire	1	0	0	0	0
Monitoring Equipment Issues	3	0	0	0	0
Odour	0	0	0	0	0
Spillage	6	0	0	0	0
Breach of trigger Level	2	0	0	0	0
Uncontrolled Release	3	0	0	0	0

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
Other	1	0	0	0	0

### Comment

- 13 Abatement issues from various maintenance faults with both the SCR and FGD plants.
- 1 breach of ELV for pH on SW7.
- 1 Fire occurred in turbine hall, was contained and no discharges generated.
- 2 Monitoring equipment issues. 1 leading to loss of CEMS. 1 reported monitoring equipment issues, was result of elevated flue gas temperature and should have been reported as an abatement issue.
- 6 Spillages relating to HFO/ Diesel fuel lines, all spills were contained within drainage systems/ bunds.
- 2 Trigger level breach from various site boreholes and elevated COD at SW13.
- 2 Uncontrolled releases from an F-Gas chiller. The equipment was repaired, and leak tested prior to recommissioning.
- 1 Uncontrolled release of SO<sub>x</sub> due to pump failure causing loss of abatement.
- 1 Other- probe malfunction on SCR outlet, leading to elevated NO<sub>x</sub> emissions.

All incidents have been reported, investigated and corrective actions implemented

## 6) Our Environmental Emissions

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### **Explanation**

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Wastewater
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA<sup>6</sup>.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

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<sup>6</sup> See section 5, Incidents

## Storm Water

### Explanation

Storm water is rainwater run-off from roof and non-process areas of a facility, e.g. car parks, and generally shall not contain any pollution.

Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

### **1. Storm water from our facility is managed prior to release by;**

Surface water from the site is collected through various drains on site before discharging through a number of discharge points.

SW1 (Ash Storage Area) collects surface water from the ash landfill area which passes through a settlement tank before discharge.

SW2 (Unit 3 process water and station drainage) passes through an oil interceptor before discharge.

SW4 (Cooling Water Intake Band Screen Wash Water) discharges directly.

SW5 and SW6 (Main boiler drains and station drainage) pass through one of two interceptors before discharge

SW7 (Unit 1 & 2 process water and station drainage) passes through an interceptor prior to discharge.

SW8 is the main cooling water outflow from the unit condensers and discharges directly.

SW9 (coal yard run off) discharges through an oil interceptor prior to discharge.

SW10 (sanitary effluent) passes through a septic tank prior to discharge.

SW13 (FGD Landfill area) passes through an oil interceptor prior to discharge.

All discharge points discharge into the Shannon Estuary under agreed EPA licence limits.

SW3 (sanitary effluent) is no longer in use.

SW11 does not have emission limits associated with it.

Discharge from SW14 is recycled and reused within the power generation process on site.

SW15 has not been defined as the associated landfill area has not been put into use.

**2. Storm water from our facility is released into the following water bodies:**

Shannon Estuary

**Table 7 Summary of Storm Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant<sup>7</sup></b>	<b>Comment</b>
SW1 – pH	12	100%	
SW1 – Suspended Solids	12	100%	
SW2 – pH	12	100%	
SW2 – Suspended Solids	12	100%	
SW2 – Mineral Oil	4	100%	
SW2 – Ammonia (as N)	12	100%	
SW3- BOD/ pH	0	N/A	No flow during 2024
SW4 – Chlorine	0	N/A	No flow during 2024
SW5 – Mineral Oil	0	N/A	No flow during 2024
SW6 – Mineral Oil	4	100%	
SW7 – Suspended Solids	12	100%	
SW7 – Mineral Oil	4	100%	
SW7 – Ammonia (as N)	12	100%	
SW7 – Chlorine	4	100%	
SW8 – Temperature / Thermal Load	Continuous	100%	
SW8 – Chlorine	52	100%	
SW9 – pH	0	N/A	No flow

<sup>7</sup> % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.

SW9 – Mineral Oil	0	N/A	No flow
SW9 – Suspended Solids	0	N/A	No flow
SW13 – pH	4	100%	
SW13 – Suspended Solids	4	100%	
SW13 - COD	4	50%	

Add rows as necessary.

## Comment

Weekly visual inspections of all key discharge points took place with no evidence of contamination observed.

There were 2 occasions in Q1 & Q2 2024 where the trigger level for SW13 was breached for COD, levels have since returned to normal.

## Wastewater

### Explanation

There are two types of wastewater that can be produced:

- Process wastewater produced from the activities and;
- Sanitary wastewater from toilets, washrooms and canteens.

Our EPA licence requires us to manage our wastewater on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the wastewater produced from our activities, where it is released and the results of monitoring this year.

- 1. Wastewater produced by our activities is treated as follows before discharge to a receiving waterbody;**

Sanitary discharge point SW3 no longer in use.

Sanitary waste discharge through SW10 is treated in an on-site septic tank before discharged.

**2. Treated wastewater from our facility is released into the following water bodies:**

Shannon Estuary

**Table 8 Summary of Wastewater Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant</b>	<b>Comment</b>
SW3 – BOD	0	N/A	SW3 no longer in use
SW3 – Suspended Solids	0	N/A	SW3 no longer in use
SW10 – BOD	4	100%	
SW10 – Suspended Solids	4	100%	

Add rows as necessary

Comment

All sanitary waste discharges were compliant with licence ELV's.

## Air

### Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

### 1. We monitor air emissions from the following number of emission points at our facility.

A1-1, A1-2, A1-3

**Table 9 Summary of Air Emissions Monitoring**

Parameter measured	No. of Samples	% Compliant	Comment
<b>A1-1 NOx - Hourly Averages</b>	Continuous	99.61%	No validated hourly average value shall exceed twice the daily average emission limit value.
<b>A1-1 SO2 - Hourly Averages</b>	Continuous	99.66%	
<b>A1-1 Particulates - Hourly Averages</b>	Continuous	100.00%	
<b>A1-1 NOx - Daily Averages</b>	Continuous	100.00%	For nitrogen oxides, no validated daily average value shall exceed the daily average emission limit value.

<b>A1-1 SO2 - Daily Averages</b>	Continuous	100.00%	No validated daily average value shall exceed the daily average emission limit value.
<b>A1-1 Particulates - Daily Averages</b>	Continuous	100.00%	No validated daily average value shall exceed the daily average emission limit value.
<b>A1-1 NOx - Monthly Averages</b>	Continuous	100.00%	No validated monthly average value shall exceed the daily average emission limit value.
<b>A1-1 SO2 - Monthly Averages</b>	Continuous	100.00%	No validated monthly average value shall exceed the daily average emission limit value.
<b>A1-1 Particulates - Monthly Averages</b>	Continuous	100.00%	No validated monthly average value shall exceed the daily average emission limit value.
<b>A1-1 Volumetric Flow</b>	Continuous	100.00%	
<b>A1-1 HCl</b>	3 (Quarterly)	No ELV	3 Completed, Q1 testing not possible due to contractor availability and unit running.
<b>A1-1 HF</b>	3 (Quarterly)	No ELV	3 Completed, Q1 testing not possible due to contractor availability and unit running.
<b>A1-1 Ammonia</b>	2 (Bi-Annually)	100%	2 tests completed

<b>A1-1 SO3</b>	1 (Annually)	No ELV	Complete in December
<b>A1-1 Mercury</b>	1 (Annually)	No ELV	Complete in April
<b>A1-2 NOx – Hourly Averages</b>	Continuous	97.00%	No validated hourly average value shall exceed twice the daily average emission limit value.
<b>A1-2 SO2 – Hourly Averages</b>	Continuous	99.42%	
<b>A1-2 Particulates – Hourly Averages</b>	Continuous	100.00%	
<b>A1-2 NOx – Daily Averages</b>	Continuous	100.00%	For nitrogen oxides, no validated daily average value shall exceed the daily average emission limit value.
<b>A1-2 SO2 – Daily Averages</b>	Continuous	100.00%	No validated daily average value shall exceed the daily average emission limit value.
<b>A1-2 Particulates – Daily Averages</b>	Continuous	100.00%	No validated daily average value shall exceed the daily average emission limit value.
<b>A1-2 NOx – Monthly Averages</b>	Continuous	100.00%	No validated monthly average value shall exceed the daily average emission limit value.
<b>A1-2 SO2 – Monthly Averages</b>	Continuous	100.00%	No validated monthly average value shall exceed the daily average emission limit value.
<b>A1-2 Particulates – Monthly Averages</b>	Continuous	100.00%	No validated monthly average value shall exceed

			the daily average emission limit value.
<b>A1-2 Volumetric Flow</b>	Continuous	100.00%	
<b>A1-2 HCl</b>	0	N/A	Not required as Unit 2 only ran on HFO in 2024
<b>A1-2 HF</b>	0	N/A	Not required as Unit 2 only ran on HFO in 2024
<b>A1-2 Ammonia</b>	1 (Bi-Annually)	N/A	1 test missed due to low run hours in 2024, and unit coming offload before testing could be completed.
<b>A1-2 SO3</b>	1 (Annually)	N/A	Completed in Q1. No ELV.
<b>A1-2 Mercury</b>	1 (Annually)	N/A	Not required as Unit 2 only ran on HFO in 2024
<b>A1-3 NOx - Hourly Averages</b>	Continuous	99.47%	No validated hourly average value shall exceed twice the daily average emission limit value.
<b>A1-3 SO2 - Hourly Averages</b>	Continuous	98.96%	
<b>A1-3 Particulates - Hourly Averages</b>	Continuous	99.97%	
<b>A1-3 NOx - Daily Averages</b>	Continuous	100.00%	For nitrogen oxides, no validated daily average value shall exceed the daily average emission limit value.
<b>A1-3 SO2 - Daily Averages</b>	Continuous	99.73%	Daily Exceedance on 13 May- Reported under INCI027752
<b>A1-3 Particulates - Daily Averages</b>	Continuous	100.00%	No validated daily average value shall

			exceed the daily average emission limit value.
<b>A1-3 NOx - Monthly Averages</b>	Continuous	100.00%	No validated monthly average value shall exceed the daily average emission limit value.
<b>A1-3 SO2 - Monthly Averages</b>	Continuous	91.67%	Unit 3 only ran for 1 day during May and on that day had a daily average exceedance. Therefore, Monthly is also exceeded.
<b>A1-3 Particulates - Monthly Averages</b>	Continuous	100.00%	No validated monthly average value shall exceed the daily average emission limit value.
<b>A1-3 Volumetric Flow</b>	Continuous	100.00%	
<b>A1-3 HCl</b>	3 (Quarterly)	No ELV	3 Tests completed-Final Quarterly test not completed in 2024 due to major outage.
<b>A1-3 HF</b>	3 (Quarterly)	No ELV	3 Tests completed-Final quarterly test not completed in 2024 due to major outage.
<b>A1-3 Ammonia</b>	1 (Bi-Annually)	100.00%	1 test missed due to low run hours in 2024, and unit coming offload before testing could be completed.

<b>A1-3 SO3</b>	0 (Annually)	No ELV	Un able to complete due to unit being taken offline before could be complete.
<b>A1-3 Mercury</b>	1 (Annually)	No ELV	Complete

Add rows as necessary

### Comment

Unit 2 only fired on HFO in 2024, hence quarterly tests for HCL and HF and annual tests for mercury were not required. Some testing was not completed due to low run hours/ units being taken offload before testing could be complete. Where hourly/ daily exceedances occurred, all were reported to EPA.

**Table 10 Summary of Odour Assessments Carried Out**

<b>Assessment Conducted By</b>	<b>No. of Odour Assessments</b>	<b>% Compliant<sup>8</sup></b>	<b>Comment</b>
Licence Holder	Not applicable		
EPA			

Add rows where necessary

Comment

Not applicable
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<sup>8</sup> A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at <http://www.epa.ie/pubs/advice/air/emissions/ag5-odourassessment.html>

## Fugitive Solvent Emissions

Are you are required to monitor fugitive solvent air emissions from your facility?

Yes

No

### Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations<sup>9</sup>. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

**Table 11 Summary of Fugitive Solvent Emissions**

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant
Not applicable		

Comment

Not applicable

<sup>9</sup> See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

## Groundwater

### Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

#### 1. Do you have a groundwater monitoring programme in place?

Yes

No

#### 2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?

Yes

No

**Table 12 List of Groundwater Pollutants Identified**

Pollutants
Ammonia
Sulphate
Chloride
COD
DRO
Mineral Oil

Add rows as necessary

**3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.**

Sulphate, chloride and COD detections are related to seawater ingress due to the borehole's proximity to the Shannon Estuary.

Comment

Regular Quarterly and Annual Monitoring is in place in order to identify borehole trends.

## Noise

### Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

### 1. We conducted noise monitoring on the following dates this year:

31<sup>st</sup> January- 02<sup>nd</sup> February 2024

### 2. Was the noise monitoring carried out at:

- i. the boundary of our facility,
- ii. noise sensitive locations off-site, or
- iii. both?

3x Noise Sensitive Locations off-site

### 3. Were measured noise levels compliant with your EPA licence limits?

Yes

No

If No, we took the following actions to address the noise level exceedances?

N/A

Comment

N/A

## 7) Waste

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### Waste Generated

#### Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in table 13 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

**Table 13 Waste Generated**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	227.47	73.87 decrease%	91.51%
Non-Hazardous	75009.59	14.6% decrease	100%
Inert	0	0	0
<b>Total Tonnes</b>	<b>75237.06</b>	<b>17.90 % decrease</b>	<b>1.52%</b>

#### Comment

Aqueous washing of approx. 250T generated in 2023 was not generated in 2024, this was generated in 2023 due to washings of unit 2. This did not occur in 2024.

No firefighting foam was removed from site in 2024 compared to 2023.

Oily water removed from interceptors decreased by half in 2024 due to the increased storage capacity of newly added oil interceptors.

3 times the amount of absorbents/ filters were generated 2023. The quantity of oily waste generated in 2024 reduced.

Decrease in run hours and use of HFO on unit 2 has reduced the ash generated on site by 14.60%.

## Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes

No

### Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 14 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

**Table 14 Waste Accepted**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	Not applicable		
Non-Hazardous			
Inert			
<b>Total Tonnes</b>			

Comment

Not applicable

## 8) Financial Provision

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### Explanation

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high-risk facility<sup>10</sup> by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes

No

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

2024

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

2017

4. Has there been any significant changes on your site since the last agreements?

Yes

No

If yes, have you submitted details to the EPA?

Yes

No

N/A

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<sup>10</sup> See Appendix II

# Appendix I

## Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

Class 1	Minerals and other materials
Class 2	Energy
Class 3	Metals
Class 4	Mineral fibres and glass
Class 5	Chemicals
Class 6	Intensive Agriculture <sup>11</sup>
Class 7	Food and drink
Class 8	Wood, paper, textiles and leather
Class 9	Fossil fuels
Class 10	Cement, lime and magnesium oxide
Class 11	Waste
Class 12	Surface Coatings
Class 13	Other Activities

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<sup>11</sup> This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at <http://www.epa.ie/pubs/advice/aerprtr/aerguid/>

# Appendix II

## High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

### NOTE:

This list is subject to change.

See the link below for further information.

<http://www.epa.ie/pubs/advice/licensee/fp/epaapproachtoenvironmentalliabilitiesandfinancialprovision.html>