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Dr Jonathan Derham
Environmental Protection Agency
PO Box
Johnstown Castle Estate
Co Wexford

31st July 2007

Waste Licence Application W0232-01

Dear Sir

The above refers to an application by Dublin City Council for a waste to energy (WTE) facility at Pigeon House Road, Ringsend, Dublin 4.

Synergen Power Ltd made a written submission to the Environmental Protection Agency on 20th October 2007 raising concerns regarding the proposed WTE development and its impact on its Dublin Bay Power Plant. I would like to reaffirm the concerns identified in that earlier submission regarding the proposed cooling water intake and discharge arrangements for the WTE plant and more specifically note that:-

Cooling Water Discharge

The discharge of the Waste to energy plant is proposed to be located within the Outfall Channel which is an area covered by Synergen's IPPC Licence Reg No.PO486-01. This raises two specific areas of concerns for Synergen

1. That it is located within the area covered by Synergen's IPPC licence and has implication for compliance monitoring and determining responsibility in the event of a breach of licence requirements caused by the WTE plant.
2. That the increase in the recirculation of hot water, as identified in the EIS for the WTE plant, will increase the temperature at the Dublin Bay Power Plant's own cooling water intake. An increase in the cooling water intake temperature to Synergen's has three implications.
 - firstly, as a direct consequence to the higher inlet temperature (and without allowing for the efficiency impact) it will result in an increase in the cooling water discharge temperature from the Dublin Bay Power Plant.

- secondly it will reduce the thermal efficiency of the plant, resulting in a loss of output available for dispatch to the national electricity system and
- thirdly the attendant loss of process efficiency will also sub-optimize the environmental performance (including CO2 and cooling water temperature rise),

Cooling Water Intake

The proposed intake for the plant is at the mouth of the of the existing outfall channel into which Synergen discharges its cooling water as permitted under Synergen's IPPC Licence Reg No.PO486-01.

The EIS identifies that the temperature at the mouth will be significantly higher than the ambient temperature of the river Liffey water. The WTE plant will therefore be using cooling water with an inlet temperature which is higher than it would otherwise be if the intake was located at an alternative location in the river. This would have the impact of

1. reducing the operating efficiency of the WTE plant and increasing the resultant CO2 emissions to a level higher than they might otherwise need to be, and also
2. increasing the temperature of the discharge having taken into account the temperature rise from the heat exchange in their plant's main turbine condenser heat exchanger and other auxiliary heat exchangers.

The former has been identified to the applicant but ultimately this is a matter which must be considered by the applicant and the EPA. The latter however is of specific concern to Synergen as the cooling water outlet is currently proposed to discharge into an area (i.e. the Outfall Channel) covered by Synergen's IPPC Licence Reg No.PO486-01 and which contains restrictions on temperature rise.

In summary Synergen are concerned that the proposed location of the inlet and outlet of the cooling water for the third party WTE plant will adversely impact on Dublin Bay's Power environmental performance and the environmental conditions within the Synergen licenced area and therefore could have implications for compliance with Synergen's IPPC Licence

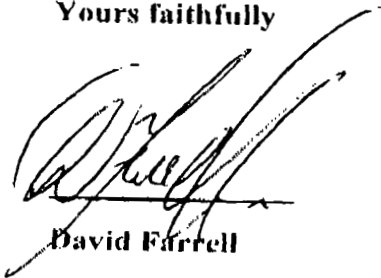
I understand that the LPA are taking into consideration Synergen's concerns regarding cooling water arrangements for the WTE plant and hope that a more appropriate arrangement for the WTE cooling water can be secured. However in the

event that the EPA does not see fit to address the environmental impact and Synergen's concerns through conditions for the grant of the licence for the WTE plant can you please confirm that the licence requirements in Synergen's IPPC Licence Reg No. PO486-01 can be amended to take account of the third party (ie WTE) environmental impact within Synergen's existing licenced area. In particular I would appreciate if you can confirm that it is possible for the EPA to ensure that Synergen will be held neutral to the impact of the WTE from an environmental compliance perspective. Furthermore, without prejudice to your decision on WTE plant application, I would appreciate if the EPA can advise what amendments would be required to current arrangement to address

- The inclusion of third-party discharges in an area for which the EPA has deemed Dublin Bay Power Plant to be responsible.
- The ability of Dublin Bay Power Plant to demonstrate compliance with its Integrated Pollution Control and Prevention (IPPC) Licence Reg. No. P0486-01, which regulates environmental performance at the station.
- The ability to separately attribute impacts of different discharges.

I am available to discuss the points noted in this letter at your convenience if you require any further information or clarification on the issues raised

Yours faithfully



David Farrell

General Manger

Synergen Power Ltd.

Copy: David Brazil, Dublin Bay Power Environmental Officer