Sub (1)

Sonja Smith

Subject: FW: Quinn Cement IPPC licence application register number P0378-02

From: Frank Clinton
Sent: 02 September 2011 10:19
To: Ana Bolger
Cc: David.Bell@doeni.gov.uk
Subject: FW: Quinn Cement IPPC licence application register number P0378-02

Ana

This should be treated as a submission on the Quinn Cement application.
The submission is made by Mr David Bell on behalf of the Northern Ireland Environment Agency (NIEA).

Regards

Frank Clinton

From: Bell, David [mailto:David.Bell@doeni.gov.uk]
Sent: 02 September 2011 09:46
To: Brian Meaney; Frank Clinton
Cc: Bradley, Keith
Subject: Quinn Cement IPPC licence application register number P0378-02

Brian,

We have now reviewed the revised dispersion modelling report and the IPPC Licensing application form for this proposal. We have the following comments:

1. We acknowledge that emissions of ammonia from the cement plant after modification will be subject to a low ELV (at approximately 30 mg/m3 - although this may be above 'baseline' which is not defined in the application.) There are ammonia sensitive habitats within several kilometres of the plant - notably Moninea Bog on the Northern side of the border. It would be useful to demonstrate more explicitly that the proposed emissions of ammonia will not impact significantly on this habitat or to record such an assessment as part of the determination process.

2. Table 17 of the revised dispersion modelling report (on page 17) contains reported measured data for PCDD/F results in air. The relationship between the measured values for PCDD/F and values expressed as TEQ differs greatly between the two samples and it is not clear how the quoted average of the TEQ values has been derived. This average TEQ value appears to have been used in table 45 (page 41) to put the expected emissions from the plant into context. (Note that the title of table 45 refers to annual mean NO2 concentrations). Table 61 on page 58 contains a further assessment of PCDD/F concentrations at discrete receptors. The PEC figures in this table range from 0.08 to 0.1 pg/m3, but are said to include the background of 0.17 ng/m3 (which presumably should be 0.17 pg/m3). NIEA suggests that the assessment of the effect of PCDD/F emissions needs to be revisited.

3. The assessment of the impact of metals releases on pages 54 to 57 of the revised dispersion modelling report does not include mercury emissions.

4. Paragraphs 3.21 and 3.24 in attachment D to the application describe measures to control releases of PCDD/F and mercury. The information appears superficial, but we trust that these aspects will receive attention during the determination process and will be adequately controlled through the permit.

5. Paragraphs 3.28 and 3.29 in attachment D to the application refer to power loss and bag filter malfunction. Paragraph 3.28 does not appear to address the period following a malfunction during which emissions may continue. Appendix D(d) includes further scenarios, including precipitator trips, which do not appear to have been considered in assessing emissions during malfunctions.

David Bell