



**OFFICE OF CLIMATE,
LICENSING &
RESOURCE USE**

Addendum #2 to Inspectors Report on a Licence Application

To:	Directors	
From:	Dr Jonathan Derham	- LICENSING UNIT
Date:	14 SEPTEMBER 2007	
RE:	APPLICATION FOR A WASTE LICENCE FROM DUBLIN CITY COUNCIL, CIVIC OFFICES, WOOD QUAY, DUBLIN - LICENCE REGISTER W0232-01	

Application Details

Applicant:	Dublin City Council, Civic Offices, Wood Quay, Dublin
Application Register number:	W0232-01
Type of facility:	Non-Hazardous Waste Incinerator/Waste to Energy Facility
Class(es) of Activity applied for (P = principal activity):	3 rd Schedule: 8(P), 6, 7, 10, 11, 12, 13 4 th Schedule: 3, 4, 6, 8, 9, 13
Quantity of waste managed per annum:	600,000 t
Classes of Waste:	Non-hazardous household, commercial & industrial wastes (including sewage sludges and non-hazardous industrial sludges).
Location of facility:	Pigeon House Road, Poolbeg, Dublin 4
Licence application received:	10-7-2006
Third Party submissions:	15
EIS Required:	Yes

Since the Inspectors Report for this application was submitted to the Board for consideration on 21st July 2007 a further two submissions have been received. The first additional submission was considered in my addendum report to the Board dated 24th August 2007. On 3rd September 2007 a further submission was received, and is considered in this addendum report (reference Addendum #2).

Submission #15: Joe McCarthy & Valerie Jennings, 52 Claremont Road, Sandymount, Dublin 4. Received 3 September 2007.

The submission raises concerns over the release of 667,700t per annum of CO₂ from the incineration process proposed for Poolbeg, and the impact of this in relation to Climate Change matters. The submission suggests that sequestering of carbon in a landfill is a better way than incinerating the waste. The submission encloses a document based on a

presentation on these matters given to the An Bord Pleanála hearing into the planning application for the proposed facility. The submission suggests that the emissions assessment modelling undertaken by the applicants in their EIS is flawed and that this assessment has been revised. The applicants query whether the EPA have had regard to the revised modelling and whether the EIS needs updating.

Response: An Bord Pleanála sat for an extra day to hear the specific arguments of Mr McCarthy and Ms Jennings which are also the subject of their above submission to the EPA. The licence applicants (Dublin City Council (DCC)) prepared technical submissions for An Bord Pleanála as part of their rebuttal evidence¹. These documents were submitted to DCCs waste licence application files in May and July of this year and thus became part of the application. In relation to the modelling, DCC re-ran various emission and climatic scenarios to address third party concerns and critique. None of the remodelling results cause me to amend the conclusion presented in Section 4.1 of the Inspectors Report for this application (submitted to the Board on 21 July 2007). This conclusion - for statistically relevant as well as plausible climatic and operational scenarios (including abnormal) - states that;

Modelling results for stack emissions demonstrates that predicted ground level concentrations are below the relevant air quality standards for the protection of human health for all compounds under typical, maximum and abnormal operation of the facility.

In relation to the matter of CO₂ emissions the applicant shows that when following the assessment protocol given by the Intergovernmental Panel on Climate Change, that the facility proposed for Poolbeg with energy generation and district heating potential outperforms a combined Anaerobic Digestion-Landfill solution in terms of CO₂ emissions. The submission by Mr McCarthy and Ms Jennings has not produced a credible basis for rejection of the applicants approach.

Conclusions & Recommendation

I remain satisfied with the adequacy of the waste licence application documentation (including EIS - refer to section 8 of the Inspectors Report dated 21 June 2007).

I have considered the matters set out in the submission and I am satisfied that the cited Inspectors Report and Addendums, as well as the RD presented to the Board of the Agency on 21st July 2007, address the concerns raised, and recommend that the Agency grant a licence subject to the conditions set out in the said RD and for the reasons as drafted.

Signed

Dr Jonathan Derham
Senior Inspector

Procedural Note

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2005.

¹ Refer, inter alia, to Air Quality and Climate briefs of evidence of Dr E Porter for DCC submitted to the DCC Poolbeg WtE facility licence application file 24 July 2007.