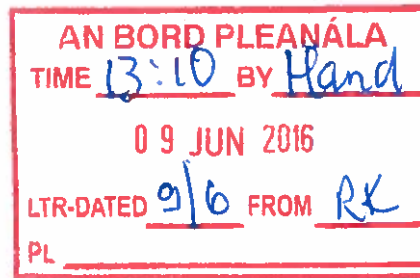


An Bord Pleanála
64 Marlborough Street
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9th June 2016

By Hand



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Re. File Reference 09.PC0204 – Changes to the volume and nature of waste to be accepted at the Drehid Waste Management Facility.

A Chara,

We write on behalf of our client Bord Na Mona.

We attended a meeting in your office on the 25th May 2016, as part of Pre-Application Consultations, to discuss the proposed project for changes to the nature and volume of waste at the Drehid Waste Management Facility.

During that meeting you provided us with copies of minutes of meetings that were held between the Environmental Protection Agency (EPA) and representatives of An Bord Pleanála on the 18th February 2016, and between the Eastern Midlands Region Waste Management Office (EMR) and representatives of An Bord Pleanála on the 22nd October 2015.

We advised at our meeting of the 25th May, that we would review the EPA and EMR minutes in more detail and formally write to you if we have any comments.

There are a number of comments that we would like added to the file.

The Eastern Midlands Region Waste Management Office (EMR) minutes on page 5 states the following:

The proposed development is to provide capacity for pre-treatment (if required) and sustainable landfill of approximately 85,000 TPA of hazardous waste to include incinerator fly ash and other residues and other hazardous wastes that are currently being exported overseas.

We would like to amend the reference to "if required" to "where required", as per our original submission. It should be noted that not all hazardous waste streams will need to be pre-treated on site or at all.

Our second comment relates to the subsequent paragraph on page 5. During our meeting on the 25th May, we advised that additional clarity was required with respect to hazardous waste and volumes noted in the minutes of our first Pre-Application Consultation meeting on the 1st September 2015. Similarly, we would like to clarify the reference with respect to hazardous residues captured in the minutes of the meeting with the EMR:

Ireland currently exports 10,000 to 15,000 TPA of hazardous waste, other than incinerator residues, and future projections indicate that the level of hazardous waste generated will be approximately 85,000 TPA, of which approximately 51,000 TPA will be incinerator residues.

Furthermore, we would like to highlight that the comment with respect to the potential to use the waste as an aggregate refers to non-hazardous incinerator bottom ash (see sentence below). This detail on the minutes of our meeting of the 1st September should also refer to non-hazardous incinerator bottom ash.

The prospective applicant considers that in the medium term there is no potential to use it as aggregate and if a hazardous waste facility is not developed, it will continue to be exported.

On page 7 of the EMR meeting minutes with respect to Hazardous Waste, it is stated that:

The National Hazardous Waste Management Plan 2014-2020 provides for three hazardous landfills to be developed; one to be located within the Dublin area and two elsewhere in Ireland.

The Plan does not provide for three hazardous landfills to be developed. It provides (in Section 6.2 of the Plan) that "*consideration should be given to co-location of hazardous waste treatment at existing waste facilities or brownfield sites for the purposes of sustainability and land-use planning*". There is no restriction on the number of facilities. Therefore, the references to only one facility to be located in the Dublin area (on page 7 as above, and also on page 9) are not applicable.

At the top of page 9 of the EMR minutes, there is a reference to increases in traffic should a hazardous waste landfill facility be developed in Ireland. We would like it noted that there will be a corresponding decrease in traffic going to and from the ports, should a suitably located hazardous waste treatment facility be located in Ireland.

On the second paragraph of page 9 there is reference to a proposal for water abstraction in close vicinity of the site. We will consider any plans for water abstraction, if appropriate, as part of our EIS.

The minutes of the meeting with the EPA refer to the proposed changes to the Composting Facility on page 4. We would like it noted that the current proposal, as well as increasing the output of the existing facility and removing the restriction on the life of the facility, includes a proposal to extend the existing facility for the acceptance of an additional 45,000 TPA.

*In relation to the **composting facility**, it is proposed to increase the volume of waste to be accepted from 25,000 TPA to 45,000 TPA and to remove the restriction on the operating life of this facility. In addition, it is proposed to extend the existing facility to provide for the acceptance of an additional 45,000 TPA.*

Similarly to the EMR minutes, we would like to clarify the wording of the minutes with respect to pre-treatment of hazardous waste.

The proposed development is to provide capacity for pre-treatment (where required) and sustainable landfill of approximately 85,000 TPA of hazardous waste to include incinerator fly ash and other residues and other hazardous wastes that are currently being exported overseas.

In addition we would like to make some minor changes to the volumes noted on page 4.

In relation to Incinerator Fly Ash and Other Residues, the incinerator at Carranstown produces approximately 10,000 TPA of hazardous residues and it is expected that the Poolbeg Incinerator will produce 27,000 TPA with an additional 13,500 TPA of hazardous residues produced at other WTE facilities. There is the prospective applicant considers potential for approximately 51,000 TPA of hazardous residues to be produced.

We trust that these comments will be added to the Pre-Application Consultation file and look forward to receiving the minutes of the meeting of 25th May in due course..

Is mise le meas,


Ciara Kellett BSc (Eng) MSc (SP) MIEI MIPI
Planning Consultant