

Record Of Meeting



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| Case Reference/Description | 09.PC0204 – Changes to the volume and nature of Waste to be accepted at the Drehid Waste Management Facility, County Kildare | | |
| Case Type: | Section 37B of the Planning and Development Act 2000, as amended | | |
| Meeting: | Meeting with Eastern Midlands Region Waste Management Office | | |
| Date: | 22 nd October 2015 | Start Time: | 11.30 a.m. |
| Location: | Civic Offices, Wood Quay, Dublin 8 | End Time: | 1.00 p.m. |
| Chairperson: | Philip Green, Assistant Director of Planning | | |

Attendees:

Representing An Bord Pleanála

Philip Green, Assistant Director of Planning

Derek Daly, Senior Planning Inspector

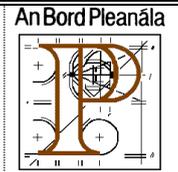
Sinéad McInerney, Executive Officer

Representing Eastern Midlands Region Waste Management Office

Hugh Coughlan, Regional Co-Ordinator

Emma Cassin, Technical Officer

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Introduction

The representatives of An Bord Pleanála (the Board) and Eastern Midlands Region Waste Management Office (EMRWMO) were introduced and the Board thanked the EMRWMO for agreeing to meet with them in relation to the proposed development.

The Board opened the meeting by giving a brief description of the pre-application consultation process being held with the prospective applicant, Bord na Móna Plc, under section 37B of the Planning and Development Act 2000, as amended. The proposed development comprises changes to the volume and nature of waste to be accepted at the Drehid Waste Management Facility, County Kildare.

It was explained that the purpose of pre-application consultations is to determine if the proposed development is strategic infrastructure development (SID), to inform the prospective applicant on procedures involved in making an application and to advise on matters relating to proper planning and sustainable development or the environment, which may have a bearing on the Board's decision in respect of a future application. The Board stated that it has held one pre-application consultation meeting with the prospective applicant to date.

Section 37C(4) of the Act provides that An Bord Pleanála may consult with any person who it considers may have information which is relevant to consultations being held under section 37B. The Board may also meet with the Environmental Protection Agency (EPA) and Kildare County Council in relation to the proposal. The purpose of this meeting is an information gathering exercise to seek the views of EMRWMO and to ascertain if it has any issues or comments in relation to the proposed development that it wishes the Board to raise with the prospective applicant. The Board will keep a record of this meeting which will issue to EMRWMO and the prospective applicant. The record of the meeting will not become available to the public until the pre-application consultation process has concluded and the Board has made a formal decision on whether the proposed development is or is not SID.

EMRWMO confirmed that it met with the prospective applicant in relation to the proposed development and a brief overview of the proposed development was presented.



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Proposed Development

The Board referred to a recent pre-application consultation request relating to changes to the volume of waste to be accepted at the Drehid Waste Facility (Case Reference 09.PC0190) which the Board had met with the EMRWMO in relation to, and noted that the Board's decision that the proposed development was not SID related to the increase in the capacity of the composting facility only.

The proposed development, which is subject of this pre-application consultation, relates to changes in the volume and nature of waste to be accepted at the Drehid Waste Facility. It is proposed to develop additional capacity for non-hazardous and hazardous waste streams of landfill for a period of 25 years, pre-treatment and processing of certain waste streams prior to landfill, and to increase the volume of waste to be accepted at the composting facility with the removal of the restriction on its operating life. The Board noted that a new element to the proposal is the treatment of hazardous waste to landfill. It advised EMRWMO that the prospective applicant has outlined in broad terms the principal of the proposed development however no details or drawings have been submitted at this stage. The proposal comprises three distinct operations within the same landholding which the prospective applicant has advised will be mutually exclusive. The prospective applicant is seeking the preliminary view of the Strategic Infrastructure Division of the Board on whether the proposed development is SID before progressing the project further.

The Board provided a brief summary of the proposal as outlined by the prospective applicant, as follows:

Non-hazardous Waste to Landfill

The facility is currently permitted to accept 360,000 tonnes per annum (TPA) of non-hazardous waste to landfill up to December 2015, after which it is permitted to accept 120,000 TPA for the lifetime of the facility. In addition the prospective applicant is seeking permission to accept 250,000 TPA of non-hazardous waste for a period of 25 years to include incinerator bottom ash, municipal waste, and construction and demolition (C&D) fines. It is also proposed that 15,000 TPA of metals will be recovered from incinerator bottom ash on-site prior to landfill.

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The Board gave a summary of the relevant figures as submitted by the prospective applicant.

Incinerator Bottom Ash

The Poolbeg Incinerator, when full commercial operations are commenced in 2017, will produce approximately 120,000 TPA of non-hazardous bottom ash and this facility will not have the capacity to recover some 10% by weight of metals from this waste stream. In addition, the Carranstown Facility currently produces approximately 50,000 TPA where metals are removed on-site and the remaining 40,000 TPA of bottom ash is either disposed of, or used as engineering material, in landfills in the region, some of which are now closed. The Regional Waste Management Plans support the development of an additional 300,000 TPA waste-to-energy capacity in the State and it is considered that, after the removal of metals, the net total bottom ash requiring management will be 220,000 TPA.

Construction and Demolition Fines

C&D fines are generally recovered for use in landfill engineering. A recent report by SLR Consulting stated that in 2013 approximately 250,000 TPA of C&D fines were produced in the Greater Dublin Area and used as landfill engineering material. It is considered that as the construction industry recovers, this figure is likely to increase.

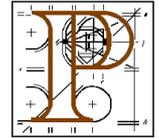
The EPA National Waste Report 2012 confirms that in 2012 approximately 500,000 tonnes of C&D waste was recovered in the Eastern Midlands Region in landfills that accepted municipal waste.

It was noted that reducing levels of landfill activity have resulted in a corresponding reduction in the requirement for deployment and recovery of material in landfill engineering applications. Due to concerns relating to an increase in illegal dumping of material, the Department of Environment Community and Local Government has introduced a new exemption from payment of a levy required to dispose this material to landfill, in order to encourage safe disposal of material in lined engineered landfills.

Composting Facility

With regard 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

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operating life of this facility. It is also proposed to extend the existing composting facility to accept an additional 45,000 TPA.

Hazardous Waste to Landfill

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.

Ireland currently exports 10,000 to 15,000 TPA of hazardous waste and future projections indicate that the level of hazardous waste generated will be approximately 50,000 TPA. 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.

Incinerator Fly Ash and Other Residues

Hazardous residues produced from incineration include fly ash and solid wastes from flue gas treatment. 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. If the additional 300,000 TPA waste-to-energy capacity is developed in the State, it is expected that approximately 13,000 TPA of hazardous residues will be produced. There is therefore potential for approximately 50,000 TPA of hazardous residues to be produced.

Other Hazardous Wastes

The National Hazardous Waste Management Plan 2014-2020 refers to other hazardous wastes that require landfill disposal including asbestos, some C&D wastes, contaminated soils, industrial wastes, sludges and filter cakes, and metals and heavy-metal-containing wastes. Current capacity required is approximately 10,000 to 15,000 TPA and this requirement is expected to at least double up to 2030. It noted that this is in addition to the hazardous residues produced through waste-to-energy facilities.

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Discussion

Non Hazardous Waste

Non-hazardous Bottom Ash

It was noted that there is some treatment of non-hazardous bottom ash on site at Carranstown and there will be no treatment at Poolbeg. The EMRWMO stated that it cannot dispute the figures which have been put forward by the prospective applicant in relation to this element of the proposal. However it would like to see the waste moving up the hierarchy including exploring opportunities for other uses, in particular during the life of the Eastern-Midlands Region Waste Management Plan 2015-2021.

In relation to the application for the Poolbeg Incinerator, the Board noted that it was intended that the bottom ash was proposed for use in recovery and as a resource material and not as a waste material. The prospective applicant has referred to current economic climate and it is of the view that it is unlikely for the bottom ash to be recovered without some State intervention, e.g. an aggregate tax, minimum level of material to be used in construction to be recyclable. Waste is therefore likely to continue to be sent to landfill or exported. The EMRWMO noted this.

Construction & Demolition Fines

With regard to C&D fines, the EMRWMO acknowledged that during the planning process it is difficult to identify what will become fines, however it considered that the figures presented are reasonable, with potential for up to 500,000 TPA to be generated. It stated that in 2006 a considerable volume of C&D fines were generated in the Dublin area.

It was noted that gypsum content is a concern due to contamination and leachate if not properly treated, particularly if near water sources. The EMRWMO welcomes and supports moving away from illegal dumping and treatment of waste in a secure engineered environment.

Waste Hierarchy

It was noted that if permission for the development were to be granted, it should be in accordance with national and regional policy. In this regard, the proposed development is to increase non-hazardous material being sent to landfill, however it is acknowledged that treatment of waste would have to meet the requirements of

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conditions prevailing at the time. Notwithstanding this, the EMRWMO said that it would not be in favour of a decision to contravene what the Eastern-Midlands Region Waste Management Plan 2015-2021 is trying to achieve in terms of moving waste up the hierarchy.

In relation to organic fines generated in residual waste, the EMRWMO referred to residential and commercial waste. It also referred to the ongoing rollout of a 3 bin source segregation system comprising residual, recycling and brown bins and the introduction of Pay by Weight for each stream in July 2016. This coupled with education, awareness and enforcement should lead to a reduction in quantities of organic fines in the coming years.

Composting Facility

The Board referred to the proposal to increase the composting from 25,000 TPA to 45,000 TPA and to create further capacity for 45,000 TPA (total 90,000 TPA) and to remove the restriction on the operating life of the composting facility. The EMRWMO said that there are a number of smaller scale composting facilities around the country and there has been an increased capacity of brown bin organic waste treatment to approx 77,000 TPA.

Hazardous Waste

The EMRWMO confirmed that there is no hazardous landfill within the State and it is not aware of one being located on the island. 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. In this regard the Board referred to a second pre-application consultation request which has been received in relation to a waste facility in the Eastern Midlands Region which also proposes to accept hazardous waste to landfill. Having regard to the possibility of considering two pre-application consultations and potentially two applications for developments involving hazardous landfills, the Board sought the view of the EMRWMO on locating two hazardous landfills within the Greater Dublin Area. It is recognised that hazardous waste is currently being exported and EMRWMO stated that policy is to develop sites in Ireland where hazardous waste can be treated.



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In identifying the need to locate one hazardous waste facility in the Greater Dublin Area and two others within the State, the Board queried if this was based on waste generation in the area? Is it intended that the other two facilities would be geographically dispersed around the country? The EMRWMO said that it is envisaged that a considerable amount of hazardous waste will be generated in the Dublin area. However, it also pointed out that approx. half of the need identified in the applicants submission is based on other facilities that have yet to come on stream. While the plan refers to locating one facility in the Dublin area, it is not specific on the location of the other two, nor does it restrict the development of two within the Eastern Midlands Region.

With regard to the three facilities referred to in the National Hazardous Waste Management Plan 2014-2020 the Board noted reference to developing a hazardous waste facility on the site of an existing landfill or waste facility. In this regard the EMRWMO stated that the Plan recognises that established landfills that are no longer in use or have closed may still have potential for alternative uses within the waste sector subject to the appropriate planning/licencing requirements and therefore fulfil a role whereby existing landfill sites can be used rather than creating new capacity.

The EMRWMO noted that the Poolbeg Incinerator is expected to be operational in mid-2017. The EMRWMO acknowledges that Poolbeg and Carranstown waste facilities will generate 37,000 TPA of hazardous waste and in addition, other facilities have been identified that could potentially generate 13,000 TPA of hazardous residues. In this regard the EMRWMO commented that the other facilities are generally at early stage of development and are not yet approved or licenced e.g. Ringaskiddy, Bottlehill, Gortnadrumna. With hazardous waste currently being exported, the National Hazardous Waste Management Plan 2014-2020 supports development of hazardous waste treatment within the State, however, an initial observation would be that a facility to treat 85,000 TPA would be dependent on other facilities which will generate the source material being permitted. It also noted that competition would exist between facilities, within the State or overseas. The EMRWMO questioned if development of all elements of the applicants proposal would be simultaneous or on a phased basis.

Easy access to a hazardous waste facility is identified as a significant factor and, with regard to locating one facility within the Dublin area, the EMRWMO noted that the location of the Drehid Waste Management Facility is reasonably accessible to



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the Greater Dublin Area. It was noted that if capacity to treat hazardous waste in Ireland is developed, this would likely lead to increase in traffic as material is not being transported to ports for export, and will instead be transported elsewhere within the State. It was agreed that transport of hazardous waste across the state would require robust environmental assessment.

It was noted that different standards apply when locating a hazardous waste facility compared to a non-hazardous waste facility and more stringent conditions would be required from a licencing point of view. It noted that the Drehid site is on the border of two water catchment areas – one to the north and one to the south – and there is a proposal for water abstraction in close vicinity to the site. This would also be an important consideration in any application.

General

In isolation the EMRWMO said that the figures presented look reasonable as to what is arising. The only potential issue is the availability of organic fines, having regard to policy objective to see a reduction in production of same. The EMRWMO would consider it useful to get a breakdown as to how the relevant figures were reached.

The Board noted that any application would have to be clear with regard to inputs to the facility in terms of quantity per annum and lifetime. The Board's interpretation was that any new permission would supercede the 120,000 TPA of waste to landfill that is permitted up to 2028 and the Board would seek clarity from the prospective applicant in relation to this.

It is likely that the Board will also consult with the EPA in relation to the project, in particular in relation to the hazardous element of the proposed development.

Conclusion

The Board thanked EMRWMO for meeting with it in relation to the proposed development and stated that it will issue the record of this meeting in due course.

Philip Green

Assistant Director of Planning

18th December 2015