



Meeting Record

Title:	Environmental Protection Agency (EPA) and Sandymount& Merrion Residents Association (SAMRA) re: Dublin Waste to Energy Limited, Industrial Emissions Licence Reg. No. W0232-01.	
Meeting Date & Time:	03/09/2018, 14:00	
Venue:	EPA, McCumiskey House, Richview, Clonskeagh Road, Dublin 14	
Name, Address and Reg. No. of the Licensee :	Dublin Waste to Energy Ltd.(DWtE)Pigeon House Road, Poolbeg, Dublin 4 W0232-01	
Present at meeting:	EPA Office of Environmental Enforcement (OEE):	Mr Patrick Byrne, Manager, OEE Dublin Mr Thomas Sexton, Industrial Enforcement Team Leader, OEE Dublin
	SAMRA:	Ms Joan MacArthur, Chair Mr David Turner, Secretary Ms Lorna Kelly Ms Irene Lynch
Items discussed	<p>PB welcomed the SAMRA representatives and provided a brief summary of activities since the last meeting in February 2018. PB also identified that DWtE are due within the next month to submit key reports on their ‘Test Programme/Commissioning Plan’ and further information on the classification of the Incinerator Bottom Ash.</p> <p>SAMRA representatives asked for clarification in relation to the movement, management and control of ash sent off site by DWtE. PB and TS clarified the EPA role, the controls administered by other regulators particularly the Trans-Frontier Shipment Office (Dublin City Council), Local Authorities and regulators of the waste disposal facilities in other European Countries.</p> <p>DT noted that the revised ERP (dated May 2018) was the focus of SAMRA’s review and that SAMRA was concerned with aspects of the ERP, the comments/focus areas are outlined in the document provided to the EPA prior to the meeting. DT identified that the main area of concern related to risks which were identified to result in air quality deterioration resulting from emissions exceedances. Reliance on theoretical dispersion modelling as a mitigation measure was questioned. DT noted that they perceive that the level of Emergency preparedness is generally low – and SAMRA believe inappropriate, at least for the level of risk exposure to the areas closest to the incinerator.</p> <p>PB and TS outlined that the ERP is a document prepared by DWtE to comply with condition 9.2 of their licence. The ERP does not replace the requirement to comply with the conditions of the licence. The ERP is an evolving document that must be reviewed and updated, it identifies the emergency situations which may originate on the facility and shall include provisions for minimising the effects of any emergency on the environment.</p> <p>PB noted that DWtE must report all incidents which occur on site, condition 9.3 identifies</p>	

	<p>the minimum DWtE must complete following any incident. In addition, condition 3.19 identifies the licensee's requirements in the case of an abnormal operations ('In the case of abnormal operations the licensee shall under no circumstances continue to incinerate waste in the relevant process line for a period of more than four hours uninterrupted where emission limit values specified in Schedule B.1: Emission Limits to Air, of this licence are exceeded....').</p> <p>SAMRA representatives also noted the lack of clarity in the ERP regarding communications with the local community in relation to emergencies which may impact the local community.</p> <p>PB/TS outlined that in the case of an emergency which could impact on the local community the emergency services (Gardaí and Fire Brigade) would make the necessary emergency announcements via media etc. It was noted that Dublin Fire Brigade co-ordinated an exercise prior to commencement of incineration in the port area which included DWtE, National Oil Reserve etc.</p>
<p>Action:</p>	<p>EPA to identify a contact in the TFS office and pass the contact details to SAMRA. EPA will provide a response (end of November 2018) to the points raised by SAMRA in relation to the revised Emergency Response Procedure (ERP) prepared by DWtE.</p>
<p>Documents received:</p>	<p>None</p>
	<p>Signed: Patrick Byrne Date: 10/09/2018</p>