
MINUTES OF THE ENVIRONMENT STRATEGIC POLICY COMMITTEE MEETING HELD ON 26th APRIL 2017

1. Minutes of the meeting held on 5th April 2017.

Order: Agreed.

2. Matters arising.

None.

3. Chairpersons Business.

The Chair referred to the filling of a Sectoral vacancy on the Climate Change Subcommittee and recommended that this matter be deferred to the June meeting.

Order: Defer to June meeting

4. Correspondence.

The Chair advised that letters issued in relation to water regulations, Luas works and the Community Gain fund.

Order: Noted

5. Presentation by Brendan Price, Irish Seal Sanctuary

Mr. Brendan Price, Irish Seal Sanctuary gave a presentation on Seals in Dublin Bay and Bull Island to include

- The loss of hares and terns on the island
- Harassment of seals by dogs.
- Enforcement of dogs on leads on Bull Island
- Grey seals are a protected species
- The seals could be driven away from the Bay which would be disastrous for the biosphere
- Requested that dogs are banned from the Island
- The Irish Biology Institute would be interested in meeting with the SPC on a site visit to Bull Island to outline the problems being encountered.

Members thanked Mr. Price and raised the following points

- It will be difficult to ban dogs from Bull Island as many people use this amenity(CO'M)
- There is a lack of warning signage of the dangers that dogs pose to seals in the area(CO'M)

- It was suggested that to the left of causeway (towards Sutton) dogs could be banned during breeding season. (CO'M)

Order: It was agreed that the proposal of banning dogs to the left of the Causeway be examined and report issue to the SPC. Arrangements to be put in place to meet with the Irish Biology Institute.

6. Powdered Activated Carbon Report

The Chair advised the Committee that this matter was deferred from the previous meeting at Councillor O'Moore's request. It was agreed that all carbon related matters be dealt with under this item.

Members raised the following points.

- The questions regarding carbon consumption in Poolbeg have been running as questions for several months (JMCC)
- The details of the questions was repeated in the document that was submitted (JMCC)
- As carbon removes the dioxins the manner and the quantities used is important (JMCC)
- Covanta's predecessor at a plant in Miami did not use enough carbon and were fined for this. (JMCC)
- There were dioxin failures at the Covanta plant in Canada. (JMCC)
- The document submitted by Covanta is unsigned, undated and unreferenced (JMCC)
- Only 2 figures were supplied. 20 kg of carbon which is not clear if this is per incinerator line, in total or per screw metering system. 40 – 100 mgs of carbon per cubic metre of flue gas. These figures are very low (JMCC)
- Covanta has stated that the standards will be met but has not stated how much carbon will be used to meet the standards (JMCC)
- Covanta stated that there is no definitive answer on the amount of carbon to be used as each line is different and the waste feed stock is not homogenous (JMCC)
- Dioxins are measured rarely. The plant will be run for 3 or 6 months with no feedback to show that enough carbon is being used to capture the dioxins (JMCC)
- The Volkswagen approach is still possible, carbon input will be beefed up when measurement is taking place. (JMCC)
- If carbon is being metered then the dosage information can be given (JMCC)
- The recirculation of flue gas residue referenced by Covanta, what quantum of carbon is recycled. (JMCC)
- The BAT document for handling injection of carbon is recommends 3 kgs per tonne of waste which equates to 1.8m kgs of carbon. Covanta intends to use one sixth of the required. (JMCC)
- The fire risk is increases with Carbon.
- What are the dosages, recycling percentages, metering & differences between line 1 /2 in relation to carbon usage. When will the SPC be given this information (JMCC)
- Activated Carbon is expensive, in the region €300 – 800 per tonne (AK)
- How much carbon will be used per day, by using reduced amounts of carbon costs can be reduced (AK)
- What is the cost of activated carbon to run the plant (AK)

- Covanta must be buying Carbon now to service the plant – there must be some estimate of the amounts required (NO'M)
- There is no reason why the dosage levels of carbon and recycling percentages can't be shared. A projection or estimation would be a starting point. (NO'M)
- Go back to Covanta and get answers specifically in relation to Carbon (NO'M)
- At a previous meeting a presentation was given on the various pollutants showing very low levels of emissions. If the low emissions are to be achieved Covanta must know how much Carbon will be required (AK)
- What type of activated carbon will be used (JMCC)
- As waste will be accepted soon someone has decided how much carbon will be used. This information should be given immediately. (JMCC)
- The agenda notification did not issue until today, standing orders require this a week in advance of the meeting(JMCC)

James Nolan responded

- The information sought by the committee was requested from Covanta and the reports that issued were the response
- One of the functions of the CR team is to analyse the performance of the facility and to produce that report. This report will state if the plant is performing in line with the statutory requirements. Carbon usage will be analysed as part of this process.
- A report will be prepared by our CR on the quantum of carbon used.

Order: Report Noted. The following information is to be forwarded to the Committee in relation to Carbon

- (I) **Dosage rate for PAC during commissioning and operation.**
- (II) **How much carbon will be utilised during the initial commissioning phase.**
- (III) **It is proposed to recirculate flue gas residues, what percentage of PAC will be recirculated**
- (IV) **What type(s) of activated carbon to be used**
- (V) **Explanation of the differences in levels of Carbon usage between line 1 and line 2.**
- (VI) **Cost & estimated expenditure on PAC.**
- (VII) **What are the Industry Norms in relation to PAC usage.**
- (VIII) **What monitoring & reporting will be in place in relation to PAC.**
- (IX) **Who will assess and set rate of PAC usage.**

7. Exova Protocol

Members raised the following questions.

- Will additional air monitoring stations be in place when the plant is operational / testing (CO'M)
- The site specific protocol document is entirely inadequate as most of the most important measurements are still to be confirmed. (JMCC)
- Details in relation to the probes are not given (JMCC)
- The document should reissue with the TBC's filled in (JMCC)
- Will the air quality measurement campaign at the recycling centre be long term (JMCC)

James Nolan & Martin Fitzpatrick responded.

- The monitoring station at the Civic Amenity Centre is currently being installed (MF)
- The station will monitor for Nitrogen Dioxide, Sulphur Dioxide and PM10 (MF)
- Nitrogen dioxide monitoring commenced on 21st April, data will be available on line shortly (MF)
- The PM & sulphur dioxide monitoring installation will be completed with the coming weeks being available on the EPA website (MF)
- The site specific protocol is not a finalised document (JN)
- The site specific protocol has to be approved by the EPA and it will then issue to the Committee. (JN)
- The monitoring campaign will be long term, there is not a campaign closure date (MF)

Order: Report Noted. Completed Site Specific Protocol to be forwarded to members once approved by EPA.

8. Major Emergency Plan

James Nolan updated members as set out below

- The report that was circulated is the MEM for Dublin and not site specific for the Dublin Waste to Energy Plant.
- DWtE is required to have a site specific emergency plan
- The site specific is currently being reviewed (by DCC and the EPA) and then will issue to the Committee.

Order: Noted. Site Specific Emergency Plan to issue to the Committee once approved by the EPA and DCC.

9. Dublin Waste to Energy Update report.

James Nolan updated the Committee on the status of the project to include

- First waste was received at the facility on 24th April
- First fire with waste is scheduled for next week which dependant on other commissioning items being completed.
- The refractory cure is completed on both lines
- Boil outs completed on both lines
- Steam blow is completed on Line 1, Line 2 is expected to be completed over the weekend

Members raised the following

- The website does not contain much information, what is its status (JMCC)
- Is the turbine installed and when will it be synchronised (JMCC)
- It is a mandatory requirement of the EPA a license that detailed information is available on the website and it is not there yet (JMCC)
- The public communications campaign is sporadic (JMCC)

- The status of requests to release information on the grants awarded from the Community Gain fund
- Will the ATEX issues be included the Plants Emergency Plan (NO'M)
- The MEM that was circulated made no reference to ATEX risks, a detailed report is required on this.

Mr James Nolan, Vincent Norton & CDM responded

- It is expected that Covanta will take responsibility for the website and all updates on 1st May in advance of first fire (JN)
- The turbine is installed and it will be towards the end of May before it is synchronised with the grid (JN)
- We are working with Covanta to give full control (to Covanta). We are working with Covanta to determine what the content will be. (JN)
- The issue of disclosure of grants awarded is being actively pursued. (VN)
- This matter will be on the Agenda of the next meeting of the Community Gain Liaison Committee with a request to review the decision taken not to disclose the information (VN)
- The ATEX issues will be included in the Site Specific Major Emergency Plan (CDM)

Order: Noted

10. Air Quality Report

Mr. Martin Fitzpatrick brought the members through the main points of the submission on the Public Consultation

- The Consultation document was set out in 8 chapters
- Public Health should be at the centre of the Clean Air Strategy
- We should be working towards World Health Organisation Guidelines on a phased basis as distinct from meeting EU limit values
- A protection strategy should be developed for the parts of the country that have good air quality
- The Clean Air Strategy, Climate Change Strategy & Sustainable Development Strategy should be interlinked
- The Clean Air Strategy cannot be a reiteration of what is being currently done.
- The EPA is looking to double the size of the National Air Quality monitoring network
- Some of the poorer air quality is found in the regional towns as against the bigger cities
- Brexit could have implications in terms of cross border sales of bituminous fuel
- The Air Pollution Act 1987 brought a dramatic change on how Ireland dealt with Air Quality has been superceded by other pieces of legislation and there are a number of anomalies that need to be addressed. It is recommended that the Department should consider a new Clean Air Act.
- It is currently difficult to achieve convictions in Air Quality Cases.
- Some activities are not covered by legislation, e.g. crematoria
- There are issues with penalties and fines, courts rarely finds at the more severe end of penalties that could be imposed.
- A regional approach should be adopted in relation to Air Quality Enforcement, particularly in the area of bituminous fuel.

- The biggest contributor to Air Pollution is transportation
- Cleaner fuels for residences should be made more (financially) attractive.
- There is no ban on the purchase of bituminous fuel
- Some of the timber fuel products on the market are damaging for both Air Quality and domestic appliances
- There should be accreditation for the installation of domestic stoves.
- Congestion charging deals with traffic congestion and not air quality as the traffic is displaced and not reduced
- Fuel tax is equitable as it is based on how much fuel is used
- A Clean Air Act should provide for all types of pollutants be they mobile or stationary
- DCC did not make any observations in relation to Agriculture
- There should be dove tailing in relation to Climate Change & Air Quality Strategies
- There needs to be better guidance in relation to Construction and Demolition
- Air Quality on a National Basis is not available in real time.
- Low cost sensors are not reliable but we will work with companies trying to bring this technology to the market.
- There should be Central funding for a National Air Quality monitoring programme.
- Many Local Authorities are not in a position to fund Air Quality monitoring which is not the case with DCC
- An inventory of emissions in Ireland is being examined
- It is suggested that Clean Air is included in the Tidy Towns Competition
- A benchmark of Air Quality Nationally should be carried out which would be used as a starting point to working towards the World Health Organisation's standards.

Members raised the following issues concerns

- Reference to a problem in a particular is where a wood burning stove in a back garden where the flue is 25ft long. DCC brought this individual to court and won but the resident continues to burn pallets. What can be done (CO'M)
- The submission should state that we aspire to the WHO standards (NO'M)
- What is the measurement? per heads of population?, per 20,000?. (NO'M)
- Is there an urban standard v rural standard. (NO'M)
- Would it be possible, as a cooperative approach to have Air Quality units installed. I would be happy to have a unit in my back garden (NO'M)
- Members are not being given enough time to consider papers. (JMCC)
- DCC has not made any recommendations in relation additional Air Quality monitoring stations despite the fact that it is the expressed wish of this Committee that additional stations be provided in Dublin 1, 2, 3, & 4 (JMCC)
- Cars, particularly diesels, the emissions were not what the manufacturers stated. This influenced policy & fuel tax (JMCC)
- Solar Feed in tariffs should be re-introduced. (JMCC)
- What is the Eco design standards for stoves (JMCC)
- DCC should have specific recommendations in relation to Dublin Port (JMCC)
- Ships should not be allowed to generate electricity while in the port (JMCC)
- Ships cause a lot of pollution, in fact some are not allowed with 200 nkm of the US coast line (JMCC)
- We should move from the CAFÉ directive to WHO standards (JMCC)

- There are technologies, an air quality egg which reports on CO2, Nox, humidity & temperature (JMCC)
- If the technology moved on PM 0.1 will be able to be measured.
- There should be central funding for Air Quality (JMCC)

Mr Martin Fitzpatrick responded

- In relation to shipping emissions in Dublin Port a submission that supports the department's will be made
- DCC believes in the expansion of the Air Quality Network and is happy to make it more explicit.
- Low cost sensors do not work. When trialled they gave different measurements to our Air Quality monitoring equipment. Additionally when 2 low cost sensors were deployed in the same area they gave different readings. We should not be investing in this until the technology moves on further.
- He would caution against having an Air Quality monitor in residences as they are bulky and noisy.
- We should not be investing in this until the technology moves on further.
- There are enough monitoring stations to comply with the EU directive but by moving towards WHO standards additional stations will be required.
- In relation to Councillor O'Moore's specific case, this case is still open and DCC is examining options within the current legislation.

Order: Report Noted. Submission to be amended to reflect the Committee's requirements and forwarded to the Members

11. Contamination of Dry Recyclable Waste

Mr. Vincent Norton presented on the report that was circulated.

Councillor O'Moore was dissatisfied that waste operators may impose penalties on customers in relation to contaminated waste given that this may be perpetrated by individuals who do not own the bins. The solution that a gravity lock can be provided for a fee is not reasonable.

Order: Report Noted. Waste operators to be invited to the June meeting of the SPC to present on cover service provision in general and specifically, Charging structures, margins and cross contamination of waste.

12. A.O.B.

Mr James Nolan referred to the BAT document and in particular the range of carbon usage which is between .35kgs and 3kgs per tonne of waste.

Mr Joe McCarthy responded that there are 2 references for carbon injection - .35kg & 3kgs. In the case of mercury removal the rate is 3kgs / tonne and there is no range quoted.

Order : Noted

In attendance

Members

Councillor Andrew Keegan
Joe McCarthy, An Taisce
Robert Moss, Dublin City PPN
Councillor Michael Mullooly
Councillor Michael O'Brien
Councillor Ciaran O'Moore
Councillor Naoise Ó'Muirí

Apologies

Councillor Claire Byrne
Councillor Mannix Flynn
Councillor Edel Moran

Absent

William Brennan, Dublin City PPN
Robert Colleran, Dublin Docklands Business Forum
Councillor Ciaran Cuffe
Councillor Declan Flanagan

Outside bodies

Brendan Price, Irish Seal Sanctuary

Officials

Vincent Norton, Executive Manager
Martin Fitzpatrick, Principal Environment Health Officer
James Nolan, Project Engineer
Ciaran McGoldrick, A/Senior Staff Officer
Mary O'Meara, Staff Officer
Ian Boggans, Assistant Staff Officer

Councillor Naoise Ó'Muirí
Chairperson, 28th April 2017