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Our ref: 6/8/17
Your ref:

Dear Mr Peggie

Submission to the regulator regarding Discharge Permits Applications (DP(B)2009/03/01, DP(B)2009/03/02, DP(B)2009/03/03, DP(B)2009/04/01, DP(B)2009/04/02)

The Ramsar Management Authority Technical Subgroup met on the 10 June 2010 to consider the above discharge permit applications.

The technical sub-group has concerns relating to the process of the use of seawater cooling to dissipate heat generated through the various industrial processes that occur and would urge the applicants to consider any technology or alternative use including commercial applications that would minimise or eliminate the need for a seawater cooling system.

Notwithstanding the above, the subgroup would like to make the following submission in relation to the applications currently under consideration. Each discharge permit application is considered in order.

DP(B)2009/03/01 Application for Energy from Waste Plant – Cooling Water

1. Temperature.

The application sets out the increase in temperature above ambient the discharge will return to the environment. Whilst it is acknowledged that the change in working practice at the JEC power station has a compensatory factor in relation to the EFW discharge this does not negate the need to ensure the activity does not impact on the Ramsar site and the wider marine environment.
The technical subgroup asks the regulator to ensure the applicant provides evidence as to what the impact, if any, the increased water temperature has on the environment, in particular geographical extent of any impact. This evidence must consider the situation at the worst case scenario (i.e. greater temperature differential) and at various tidal states (i.e. high and low tide). The regulator is also asked to confirm the nature of the relationship with the existing consented permit with respect to the various components

of additional heating each supply under all conditions including maximum loading of all operations.

2. Oxygen supersaturation.

Seawater in coastal waters around Jersey are generally fully or supersaturated with oxygen. An increase in temperature will result in a reduction in the capacity of the water to retain the gas in solution.
The technical subgroup asks the regulator to ensure the applicant provides evidence as to the impact of this phenomenon on marine life.

DP(B)2009/03/02- Application for Energy from Waste Plant - Interceptor
DP(B)2009/03/03- Application for Energy from Waste Plant - Interceptor

1. Management of hardstanding areas.

The application relates to the discharge of rainwater from the EFW site and refers to the interceptor. There is little information on the management of these areas.
The technical subgroup asks the regulator to ensure the applicant provides all information related to the management of these areas particularly relating to storage of equipment and materials within the drainage areas and the systems in place following any incidents (either planned or accidental). The regulator also should ensure the inspection regime proposed is the most appropriate for the situation.
In keeping with overall good environmental management, the technical subgroup would encourage the applicant to consider recycling any rainwater for other purposes and undertake to review this periodically as new applications and uses may become available over time.

DP(B)2009/04/01- Application for La Collette Power Station, Cooling Water Pump House backwash
DP(B)2009/04/02- Application for La Collette Power Station, Cooling Water Pump House Interceptor

1. Biocides.

Both these applications include the addition of a biocide. Whilst the technical group appreciate the need for such measures to be taken, the presence for this type of chemical in a discharge to the marine environment needs careful assessment.
The technical subgroup asks the regulator to ensure the applicant provides all available data on this product so that the regulator can fully assess any impact. This information should include scientific study on details of effect on wider marine environment and geographical extent of any effect and impact of temperature on the product. Data related to bioaccumulation should be provided not just for the product but for all potential components following breakdown of compound in the marine environment. Given the proximity to various intakes (e.g. the viviers on the Victoria Pier), shellfish farming concessions and the Ramsar sites it is paramount that the issue is fully considered.
Other issues relate to the management of the biocide. The technical subgroup asks the regulator to ensure the applicant has considered and will continue to do so, all other options, including other biocides, in an attempt to ensure that the best possible practice is employed in the choice and management of any biocide use. This must include

assessment of dose quantity and frequency and details of any sampling regimes to co-inside with dosing times.
The technical subgroup also asks the regulator to ensure the appropriate management systems are in place should a mechanical failure occur.

Whilst it is acknowledged that the discharge from the JEC power station has been consented, the technical subgroup felt that the applicant should consider the issues raised concerning biocides with respect to the main discharge as well as those currently under consideration.

Yours sincerely

Greg Morel
on behalf of the Ramsar Management Authority – Technical Subgroup