

Planning and Environment Department

Environment Division

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Our ref: 6/8/17
Your ref: Type their reference (if any)

Dear Tim

Energy from Waste Plant Waste Management Licence Application

The Ramsar Management Authority Technical Subgroup met on the 11 August 2010 to consider the above waste management licence application.

The technical sub-group has concerns regarding the overall waste management strategy particularly relating to the ratio between waste for incineration and waste for recycling. It is felt that the current strategy does not fully consider the waste hierarchy and that a combination of “carrot and stick” solutions should be considered to ensure the best possible utilisation of the waste stream. However, it is acknowledged that this issue is a policy discussion and outside the remit of the Ramsar technical sub-group.

With respect to the waste management licence for the Energy from Waste facility the sub-group would like to raise the following issues for the regulator to consider:

1. Waste acceptance criteria

The technical sub-group feels that the tightest waste acceptance criteria should be adopted for the EFW. All material that enters the plant containing potentially polluting components will be required to be dealt with at some stage in the process. It would seem that the most environmental sound approach to addressing this issue is to remove them from the incineration waste stream as soon as possible and deal with them appropriately. It is acknowledged that controlling what is put into municipal waste delivered to the plant is difficult but nevertheless where possible, adherence to strict criteria should be observed. The group also recalled that additional sorting facilities were initially proposed to allow recycling levels to increase over time. These facilities are no longer included in the plan but the sub-group feels that they should be re-introduced to assist in improving re-cycling and waste acceptance criteria.

2. Site management and security.

The technical sub-group considered that the issue of site security was lacking in the application. Whilst it is acknowledged that this issue may have been addressed other documentation (e.g. planning application) and will be considered by other bodies (e.g.

the police), it was felt that the waste management licence needs to reflect the potential severity of a breach in the security measures on site given the possible environmental impact due the nature of chemicals and materials present. In addition, the day to day management procedures and protocols need to reflect the potential impact of accidental release and subsequent contamination of the environment.

3. Ash management – storage and longer term solution.

The technical sub-group feels that the management of the ash produced by the EFW is a significant issue. Firstly, the entire operation should strive to reduce the amount of ash produced and any potentially polluting elements, particularly heavy metals. It is also felt that the issue of the storage and long term disposal of the ash needs to be considered.

Whilst it is acknowledged that the disposal of the ash will require another waste management licence, the issue of the disposal of the ash should be considered in the waste management licence for the plant. This consideration should include alternative long term solutions to the current proposal of deposit on the reclamation site.

The sub-group wishes to emphasise the importance of dealing with the issue of ash storage and disposal in the best possible way given the potential effects of material entering the marine environment.

4. Air pollution – removal of PM2.5

The technical sub-group is in general agreement with the proposals for the control of air pollution given the fact that the licence will ensure compliance with EU waste incineration directives. However, it was felt that particulate matter down to 2.5 microns should also be removed as a matter of course. Also it was felt that the licence should automatically take into account any changes in technology or legislation that impact on this aspect of the plant's operation.

5. Stipulated time frame for licence – reviewed in light of new technologies / market forces.

The technical sub-group feels that it is important the licence remains current and up to date particularly in the light of the emergence of new technologies, changing market forces and conditions and updated legislative frameworks. To this end the sub-group strongly recommends that the licence should be granted for a set period of time and be subject to review. The group acknowledged that considerable investment had been made by the States but still felt that the process of review to ensure best practice and maximum environment benefits was achieved from the waste stream.

6. Data discrepancy 12 / 15 tons?

The technical sub-group would also request that the regulator clarify an apparent discrepancy in data provided in the waste management licence application. Different rates of hourly through put (namely 12 and 15 tonnes) are used in the application. Clarification should be sought.

Yours sincerely

Greg Morel

on behalf of the Ramsar Management Authority – Technical Subgroup