

NE2-013-R1/CHP2-005-R1

Your Ref:**Our Ref:**

935

Date:6th February 2012

Regional Inspectorate,
McCumiskey House,
Richview,
Clonskeagh Road,
Dublin 14

Re: NE2-013-R1/CHP2-005-R1

Dear Dr. Martin,

We wish to make comment on the proposed new entrant/CHP verification report sent to FMC on the 23rd January 2012. In this report, the Agency have calculated total projected emissions from the dryers and boilers at the site FMC International, as 26,076.59 tCO₂ for 2012, while our clients projected emissions from the dryers and boilers was calculated at 27,811 tCO₂. This is a difference of 1,735 tCO₂. The Agency, have calculated based on a daily average over the period July 2011 to December 2011. This makes the false assumption that the site will be operating at the same capacity in 2012 as it did in the second half of 2011.

Our clients projected emissions are not based solely on the emissions, from a single month, in July 2011, but are cross checked against budgeted production volumes at FMC International for the year 2012. This cross check validated our client's projections and should not be reduced based on historical operation in 2011. FMC know, how much product is going to be produced at the site in 2012 and how much gas is required to be combusted in the boilers and dryers to produce this much product. The site has continued to increase production levels over the past years. This will continue in 2012. 18 months of operation does not provide enough data, for the agency to assume that the new dryer has reached it's maximum throughput in the final 3rd period of the 18 months of which the dryer has been operational. Evidence of this is attached to this letter. The January 2012

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energy invoice from Dalkia CHP ltd. shows the dryer and boiler gas combusted on the site in January 2012 at 13,214,070 kWh. This is 503,540kWh (93 tCO₂) higher than FMC's submitted projected emissions. This invoice is commercially sensitive and should be treated as confidential; we ask that it not be placed on public file.

The agency has reduced projected emissions from the boilers and dryers at FMC by 6.2%. We firmly believe that the grounds for this reduction are unfair and that FMC have accurately projected emissions for 2012 based on solid budget volumes, in fact the likely hood is that these projections may well be exceeded due to increased product demand.

Should you require any further information regarding GHG emissions from FMC please do not hesitate to ask.

Yours sincerely,



Kevin Fortune