



Sub. 9
Ormond House
Ormond Quay
Dublin 7

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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Date: 11th September 2006

To: Ms Ann Bosley,
Office of Licensing Guidance,
Environmental Protection Agency,
EPA Headquarters, PO Box 3000,
Johnstown Castle Estate,
County Wexford.

**RE: Comments on Application W0232 - 01
Dublin Waste To Energy Project**

Dear Ms Bosley,

I refer to your letter of 11th July 2006 inviting comments from the Health Service Executive (HSE) on the above project. The HSE is charged with implementing systems and infrastructure which support, protect and empower individuals and communities to achieve their full health potential.

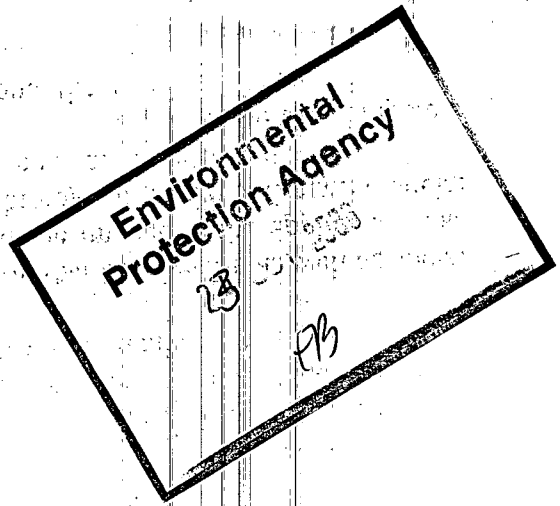
We in Environmental Health are of the firm opinion that best health, as well as social well being, must be supported. With this in mind the impact of the application has been assessed in terms of the physical, chemical, biological, social and psycho social changes which it will bring about in the environment of the affected communities. However it is important to state that this office does not purport to be the competent authority with regard to air or noise pollution and the resources required for the independent assessment of these parameters are not available to us.

Please find enclosed a schedule of the matters which have been identified as being of particular importance with regard to the impact on the health of present and future generations.

Should you wish to discuss any of these matters further please do not hesitate to contact this office on 01 820 6701.

Yours Sincerely,

PP. *Ann Marie Part P & HO*
GARY KIERNAN
ENVIRONMENTAL HEALTH OFFICER
HSE - DUBLIN- MID LEINSTER



APPLICATION: Dublin Waste To Energy Project by Dublin City Council
LOCATION OF FACILITY: Pigeon House Road, Poolbeg Peninsula, Dublin 4

	NATURE OF IMPACT	RECOMMENDATION
PHYSICAL	<p>TRAFFIC: The plant proposes to cater for up to 50 trucks per hour. This has a number of adverse effects including those associated with road safety, noise and air pollution.</p>	<p>Investigate the potential for using the river Liffey and Dublin Bay as a means of transporting waste to the site.</p>
	<p>NOISE/VIBRATION Hours of Operation: Current Proposed hours impose unfairly on residents.</p> <p>Back ground noise level of 45dB(A) is acceptable. Air monitoring stations wisely located and will yield accurate information.</p>	<p>Limit operating hours to 8am to 6pm (Mon – Fri) and 8am to 1pm (Sat)</p> <p>Pro-active system of monitoring , results made available to public and compared with a recognised standard.</p>
	<p>AIR POLLUTION / ODOUR Odour is of particular concern given the existing odour problems which have arisen owing to the close proximity of the city waste water treatment works. Further developments should not augment this. Odour of Waiting Vehicles Odour of Plant Odour From unprocessed waste which must be held over night, long weekends etc.</p> <p>Where are the current air monitoring stations. Will they yield representative data.</p>	

	WATER POLLUTION	
	FIRE	
	DUST/SMELL/AROMAS	
	LITTER/RUBBISH The area in the immediate vicinity including the access road i.e. Pigeon House Road already suffers from waste, litter and illegal dumping problems.	Trucks accessing the plant must not add to the problem, netting over trucks etc. Entrance to the site should look neat and presentable.
	PEST CONTROL	Pro-active system of pest control which incorporates the control of rodents , insects and birds. Storage of Waste to be carried over weekends
CHEMICAL	STORAGE OF CHEMICALS	
	TRANSPORT OF CHEMICALS	
BIOLOGICAL		
SOCIAL/PSYCHO SOCIAL	What assessment has been carried out in order to assess the impact on the more vulnerable sections of the population e.g. elderly, chronically ill, economically disadvantaged? Has the population been profiled in order to identify these subgroups? CONSULTATION PROCESS: Some locals feel powerless in the face of a consultation system which they may view as being heavily bureaucratic and complicated.	Empower locals, actively engage, disseminate clear and concise information. Details of changes or enhancements to the project as a result of submissions from the public or community groups must be communicated.

	<p>Regular Up dates</p> <p>OPPORTUNITY FOR EDUCATION AND TO HIGHLIGHT THE POSITIVE IMPACT OF THE PROJECT</p>	<p>Communication of results of monitoring in non technical format Communication of accidents, incidents or near misses.</p> <p>Invite visits of plant, school trips etc. Incorporate a visitors room where presentations can be given, use it as a base for the promotion of recycling , anti litter campaigns etc</p>
	<p>IMPACT ON LESS WELL REPRESENTED MORE VULNERABLE GROUPS E.G. ELDERLY: There is a substantial population of older persons living in various types of accommodation in the local area including sheltered accommodation, nursing homes etc. Such groups may not have access to the normal channels of information, may feel that their views will not be considered and may not have access to more modern channels of communication. This will lead to a sense of anxiety, isolation and helplessness.</p>	<p>Establish new ways of communication with and consulting these groups. E.G. Consult HSE director of services for elderly in the area.</p> <p>The applicant has already ear marked funds for play grounds etc perhaps some such funds should be directed towards this section of the population.</p>