

W0232-01

18/09/2006

Sub (4)

Application under the Waste Management Act Third schedule 1996 to 2005, Classes 6,7, 8,10, 11 and 13, and the Fourth Schedule of the same Class 13, to the Environmental Protection Agency for an Integrated Pollution Control Licence by Dublin City Council , 7<sup>th</sup> July 2006 for the Proposed Waste to Energy Plant to be constructed by Elsam, on the Poolbeg Peninsula at Ringsend, Dublin 4.

Dear Sirs,

I wish to object in the strongest possible terms to this application, on the grounds that it is intended to discharge "cooling water" from the plant to the river Liffey at the above address.

This water will be loaded with Biocides; the Liffey at this stretch of the river is already over loaded with similar chemicals entering from 1) the Synergen/ ESB Power Station, 2) the water from the Dublin Bay Waste Water Treatment Plant and 3) The ESB Poolbeg Plant. The resultant constant discharge of Trihalomethanes together with the elevated temperature of the discharge, is likely to create a large "dead" stretch of the river. Please note that the route of migrating salmon up the Liffey has not been mapped, nor is the route of the smolts (the largest salmon smolts in any river in Ireland) on the huge journey through the estuary to the sea. We have been told on good authority that radio tagged salmon released at Poolbeg do not reach Islandbridge. As you know Salmon have a single requirement on their return to their spawning grounds, **clean oxygenated water**. The south side stretch of the Liffey for a good distance into the Fairway, does not at all meet that simple requirement, the condition is now to be aggravated I believe the synergistic effects of all these industries would create an end point for the survival of salmo Salar in the Liffey.

That, along with the continuing grossly polluted state of the Camac River is a National disgrace in the matter of the health of our waterways and rivers

The applicant intends to use the route of the cooling water channel of the former Ringsend Power Station for the discharge of a new additional cooling water stream to the Liffey. A new channel arm from the Waste to Energy Plant is to be cut for a distance of 150 metres, and the dredge spoil from this, part of the former City Dump, laden with arsenic and heavy metals as well as anthracenes is likely to wind up at sea. Where?

The values and velocity of discharge are given in Chapter 12 of the E.I.S. now before you, the bathymetric studies and graphs are excellent, but merely guess work as to the effects on the Eels. Salmon and Trout which endeavour to survive in this terrible medium. Has this country no shame at all ?

This aquifer, the Hot Water Cooling Channel from the Synergen Power Station was the subject of protracted abuse for a period of over six months in 2001, and constant complaints both in writing and in person to the Department of the Environment and Dublin City Council achieved no response, they were disregarded. I was in communication with yourselves at that time.

The history of that problem is that a complaint, complete with file and photographs was made to the Environment Directorate (D2) of the European Commission, the



complaint is a registered complaint No. P2001/4789. It was closed after the corrective action taken by the Executive of ESB Synergen which had been unaware that Number seven (no. 7) firms were discharging sewerage, paint, heavy oils, battery acids and clutch fluids –swarf- into the channel while the officers of the City Council disregarded it and made no attempt to stop it or to prosecute the firms in question. Pipes were bubbling oil into the channel and Irish Enco washed out two huge old oil tanks which they were re commissioning.

The abuse was finally stopped when the Norwegian Officer, a Director of Synergen received a complaint from me and others, in person, and caused an artificial dam to be built in the said aquifer so that the culprits were forced to desist; a cleaning out of the aquifer took place over many weeks and the expense of that was in the region of a quarter to a half a million (£) pounds. The figure may possibly be found in the book of Estimates for Dublin City Council for 2001/2002. The staff involved had to be immunised before commencing the work. However the mud/silt at the floor of the water system there would still contain a heavy content of hydrocarbons/PAH and substantial traces of heavy metals, to say nothing of the bacteria and viruses that probably still lurk in it. It is now intended to cut a new channel from the proposed Incinerator along Shelly Banks Road and under Pigeon House Road for the discharge of cooling water to the Liffey.

I need hardly draw your attention to the status of the Liffey as a designated Salmon river or to the fact that the Three Rivers Project, for the Bynne, Suir and Liffey, receives 85% funding from the European Commission. Unfortunately this Project does not take in the river from Island Bridge to the Poolbeg Light House. Not alone do fish have to face the salt wedge they must miraculously get through a vile barrier of industrial chemicals and sewage filtrate. Even in the hungry eighties of the last century (the 20<sup>th</sup>) the first salmon of the year taken from the Liffey would command as much as a thousand pounds (£1,000). Can it now be said that the Liffey provides the first salmon of the year in the first decade of the 21<sup>st</sup> century.

**With regard to the application which includes sea bed insertion and disposal of dredge spoil at sea, there is no indication as to where contaminated material is to be buried. The major sand banks of Dublin Bay have been favourite places for this appalling activity and in particular the Burford Bank, this should not be permitted under any circumstances.**

I urge you, in the light of the incompetence and neglect displayed by the "Competent Authority" with regard to the Liffey in 2001, and indeed to the present day, to refuse this application for a license, and I feel that no doubt another location under a more law enforcing local authority should be found by ELSAM for the Waste to Energy Project. We can not trust the City Council to monitor any thing, much less the care of stored Bottom Ash and or flue ash, very near to the Coast Guard Houses on Pigeon House Road and a new development of apartments at Pigeon House Quay.

I enclose herewith, as a synopsis of the disgusting treatment of the river in 2001, a copy of an e-mail sent by me to Ms. Mary O'Brien of the DOE, as well as a few of photographs, a section of the O.S.map for the area, and I feel that you yourselves may still hold a file on this matter. If necessary I can swear an affidavit along with others who saw what was done in 2001 with regard to this most important waterway

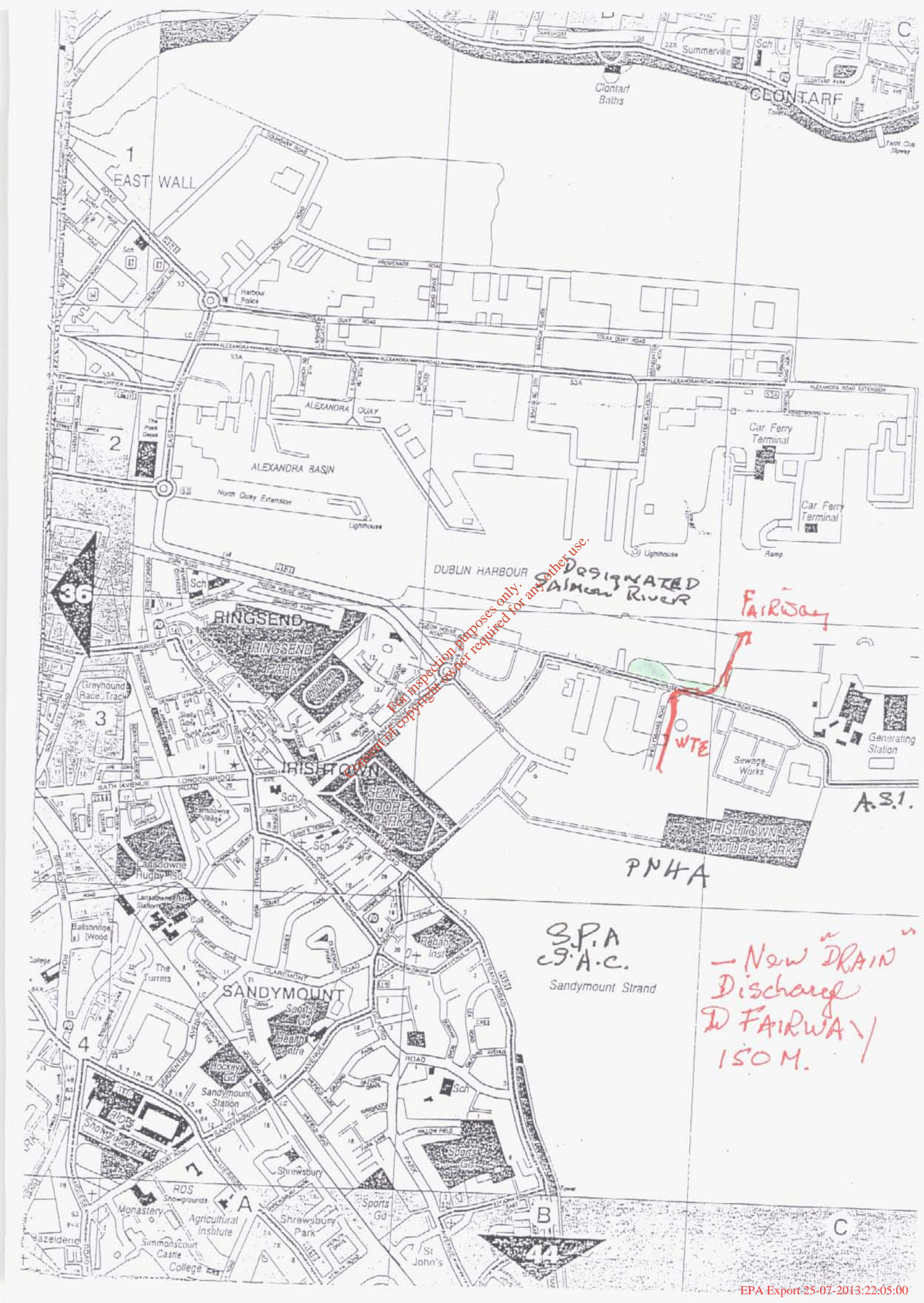
Yours sincerely,

*Catherine Cavendish*

Mrs Catherine Cavendish, 6 Prospect Terrace, Marine Drive, Sandymount, Dublin 4.

Tel 01 - 6082430





Clontarf Baths

CLONTARF

1 EAST WALL

2

36

3

4

RINGSEND

IRISH TOWN

SANDYMOUNT

S.P.A  
C.P.A.C.

Sandymount Strand

Fairway

WTE

PNHA

New DRAIN Discharge to FAIRWAY 150 M.

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44



Re Appl. for licence by E. Lynn/DCC

COP



1st October, 2001

Mr. Matt Crowe,  
Environment Protection Agency,  
P.O. Box 3000,  
Johnstown Castle Estate,  
Wexford.

AN ROINN COMHSHAOIL

AGUS RIÁLTAIS ÁITIÚIL

DEPARTMENT OF

ENVIRONMENT AND

LOCAL GOVERNMENT

TEACH AN CHUSTAIM

BAILE ÁTHA CLIATH I

CUSTOM HOUSE, DUBLIN 1

Tel No: +353 1 888 2000

LoCall No: 1890 20 20 21

Fax No: +353 1 888 2888

Dear Mr. Crowe,

I enclose for your attention correspondence the Minister has received from Mrs. Cavendish, Secretary of the Sandymount and Merrion Residents' Association concerning alleged gross pollution of the River Liffey through the Water Cooling Barrage at Ringsend.

I also enclose previous papers and correspondence with Dublin Corporation on this matter.

Please arrange to investigate this alleged pollution with a view to providing a report on this complaint to the Minister as a matter of urgency.

Yours sincerely,

Mary O'Brien  
Water Quality Section  
Tel. 01-8882471  
Fax. 01-8882014  
E-mail.marym\_o'brien@environ.irlgov.ie

cc. Mr. Larry Kanvanagh, City Manager, Dublin Corporation and Ms Cavendish

**Ena**

---

**From:** "ena cavendish" <ecavendish@oceanfree.net>  
**To:** <marym-o'brien@environ.irlgov.ie>  
**Sent:** 06 October 2001 23:37  
**Subject:** pollution of the River Liffey through the Cooling water channel of Ringsend Power Station, Synergen/ESb

6 October 2,001,  
6 Prospect terrace,  
Marine Drive,  
Sandymount,  
Dublin 4.

Ms. Mary O'Brien Water Quality Section  
Department of the Environment,  
Custom House  
Dublin 1.

Dear Ms. O'Brien,  
Thank you for your letter of October 1st 2,001, is there an error in your response? Surely a letter to the Environmental Protection Agency was issued in response to my letter to Jerome Flanagan of February 24th 2,001 ??

The water way in question has undergone a massive and expensive cleanup since July 3rd 2,001, with the temporary dam constructed on June 29th 2,001 in the Hot Water Channel still in place, the E.P.A. will find little pollution now.

The pollution in question has been seen by many people including Cllr. Chris Andrews F.F., Cllr Gerry Breen F.G., Claire Wheeler, Green Party, Mr. Charlie Murphy, Dublin Port, Kieran Callan, Harbour Master, Mrs. Frances Corr, Sec. Bath Avenue Residents' Association, Mrs Lorna Kelly, Environmental Officer, Sandymount and Merrion Residents' Association, Ms. Nessa Kane of Dublin Corporation, Mr. Brian Dolan and Mr Arne Halmes of Synergen; I could go on. A question to the City Manager was tabled by Cllr. Cuffe for the September meeting of the Council. The pollution of the Hot Water Channel has been discussed at the **Dublin Bay Project** monthly liaison meetings with residents' associations and the local boat club, and the men engaged in the 'cleanup' had to be vaccinated.

A meeting with the representatives of the above residents' associations about this pollution was held in the Synergen office on the Poolbeg at 2.00pm on July 9th, present were Brian Dolan and Arne Halmes as well as the workers from Irish En-Co.

A application for a car de-polluting plant was made to Dublin Corporation on September 9th 2,001, by Hammond Lane Metals, this was for the construction of holding tanks for coolants, oil, brake fluid, petrol and other liquids, presumably the acids we saw running out of a three inch white vinyl pipe behind Hammond Lane metals. They had no holding tanks then and they do not have I.P.C. License. They, Hammond Lane Metals do not have a fire certificate even though there was a huge fire there on 11th March 2,000.

The residents association now holds 23 packets of prints of this place in Dublin Port. Mr. Tom Burke, Assistant Principal Officer and Pollution Officer of the Department of the Marine was notified in person by Mrs. Lorna Kelly and me on June 7th 2,001, we gave him photographic prints which he copied, he reported the matter then to Mr. Collins of Dublin Corporation, there was a huge leak into the Channel from Campus Oil as well as sewerage from "Rock Events" tenants of St. Catherine's Hospital which is the Property of Green Property Company.

The City Manager described the Liffey as a sewer in an Irish Times Supplement on 6th June 2,001. ( I can send you a copy) . As he is the Supremo in Dublin he is bound to be correct.

Yours faithfully,  
Catheriene Cavendish

05/09/2006



# GROWING IN HARMONY with needs of the city

**D**UBLIN city centre has literally been transformed over the past 20 years. From a situation where few people lived in the area and commercial life was restricted to relatively small areas north and south of the river with the rest crumbling into decay, the quays as far as Heuston Station have been regenerated with a lively mix of residential and commercial developments.

The Temple Bar and Smithfield areas have become lively social, commercial and cultural quarters, and other areas of the city are benefiting from the implementation of Integrated Area Plans.

Towards the eastern end of the city centre lies Dublin's Docklands, an area which had also fallen into decay. There is a clear need to regenerate this area in order to give the city much-needed balance.

Dublin city manager John Fitzgerald agrees. "The Dublin Docklands development is one of the biggest and most significant in terms of the way the city is developing," he says.

"We are becoming more and more area-based in our approach to development, with different areas requiring different solutions.

"The Docklands is unique. It is pulling the centre of gravity of the city more and more to the east, and that is a very good thing."

The Dublin city manager, John Fitzgerald is generous in his praise for the Dublin Docklands Development Authority and the way it has avoided 'ghettoising' existing communities. Barry McCall reports on the way the docklands fit in

He points out that the west end of the city centre has already been developed as far as the Heuston Gateway.

"The city centre has been enlarged in that direction and the Docklands are hugely important in its future growth," he says. "A key point here is that we have been successful in learning from the errors of the past. The Dublin Docklands Development Authority is actively involving local communities in its work.

"Community consultation is vitally important and the authority is not falling into the traps of the past."



City manager John Fitzgerald

While consultation is vitally important, he also favours innovation and adventure as key elements of any approach to urban development and regeneration.

"Having said that consultation is vitally important, it would be a mistake if the opportunity was not taken to be a little bit more adventurous," he says. Many areas in the Docklands lend themselves to architectural innovation. There is huge pressure on the city to intensify and it is vital from everybody's point of view that the opportunity to do this in a sensitive and innovative fashion be taken in the Docklands. I am inspired with confidence that this can be done."

Speaking of the DDDA's efforts so far he is generous in his praise: "We have a very good and close working relationship with the DDDA," says Fitzgerald.

"And what has been done so far by the organisation is good quality and has set a good standard for how new spaces should be developed.

"Integrated development has become a bit of a cliché, but there is not a huge difficulty in integrating the old with the new while taking account of the whole of the community.

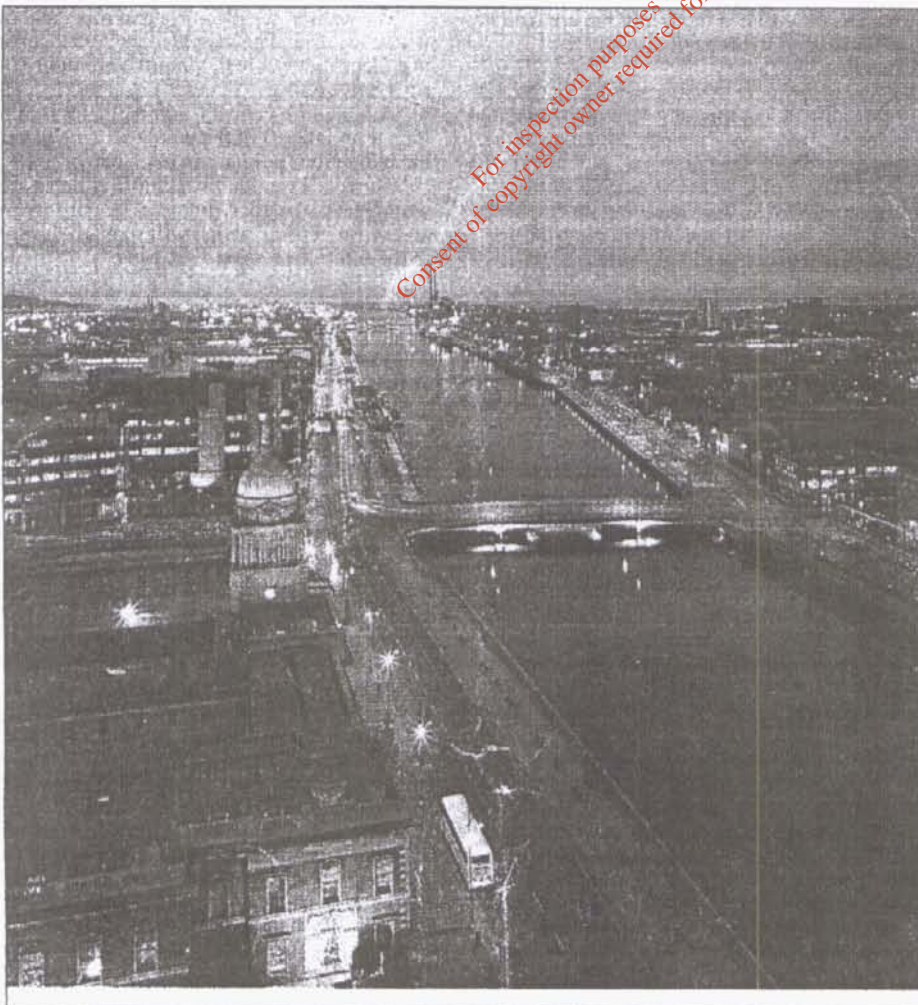
"What I am chiefly concerned about is the ghettoising of existing communities - and that is being avoided in this case."

For the future he wants to see the potential of the area realised to the full. "There is a lot of potential for residential development down there," he says. "I want to see the best possible development and it is important that we move on and get it done. We also need office and commercial space as well. It is a question of finding the right balance which suits everyone."

He sees the development of the Docklands as part of the ongoing process which is seeing the city developing as a number of separate and distinct quarters, a process which can be traced to some extent right along the length of the Liffey.

"This is good from everyone's point of view," he says. "The success of the Temple Bar development has shown us the way to go. The improvements to the river itself are also very important. The developments of the boardwalks and the lighting of the bridges have been very good.

"We are also looking at the concept of a barrage at the mouth of the Liffey to calm tide flows. This will make the river more attractive visually, making it a genuine amenity for Dubliners rather than a sewer."



The regeneration of the city can be traced right along the length of the Liffey





Maurice W. Bryan B. Sc., C. Eng., M.I.E.I., Eur. Ing.  
Conservation Adviser

Telephone and Fax 01-4931877  
e-mail: [alcedo@gofree.indigo.ie](mailto:alcedo@gofree.indigo.ie)

22 Butterfield Park,  
Rathfarnham,  
Dublin 14,  
Ireland

28 June, 2001

Mr John Fitzgerald,  
Manager,  
Dublin Corporation.

**POLLUTION OF THE RIVER LIFFEY**

Dear Mr. Fitzgerald,

Please accept my apologies for again writing to you, something that I only do when an urgent situation arises.

One of my clients has been discussing pollution of the Liffey over the last six months, and I have advised her all the actions that I deem likely to provoke appropriate response. None of these has had the least response other than letters, and I now ask you what is the correct procedure to use to have this taken seriously.

The pollution is entering the river through the old cooling water outlet channel from the demolished Ringsend power station, and certainly includes oil tank washings as well as paint residues and apparent human excrement. I am told that there was a heavy oil discharge yesterday that is being washed downstream on the falling tide. This is a matter of great concern as many birds feed in the river, especially the Terns, which now have young in their nests.

This has been reported to the Corporation, to the Harbour Board, to the EPA and to Duchas, but no action has been taken to end this illegal and damaging situation. I am disgusted that such a blatant violation of environmental law can take place within a couple of miles of the centre of our capital city – if this is the case, what hope have we got of enforcement in more remote locations?

I really am asking for your help in this case, as I do not know how to have the situation ended, and would much appreciate your urgent reply. I am, of course, completely willing to meet any appropriate person to discuss the matter, or to help in any other way.

Thank you in anticipation of your assistance, and again I apologise for having to bring this to your attention.

Yours sincerely

*Maurice Bryan*

Maurice Bryan

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CH & WNEC 21st April 201

Waste to Energy  
Application for  
an I.P.C. license  
to discharge  
" Waste / liquid  
to the Holders  
Control of E.S.B. Schemes  
1/2 copies printed  
referred to Agency  
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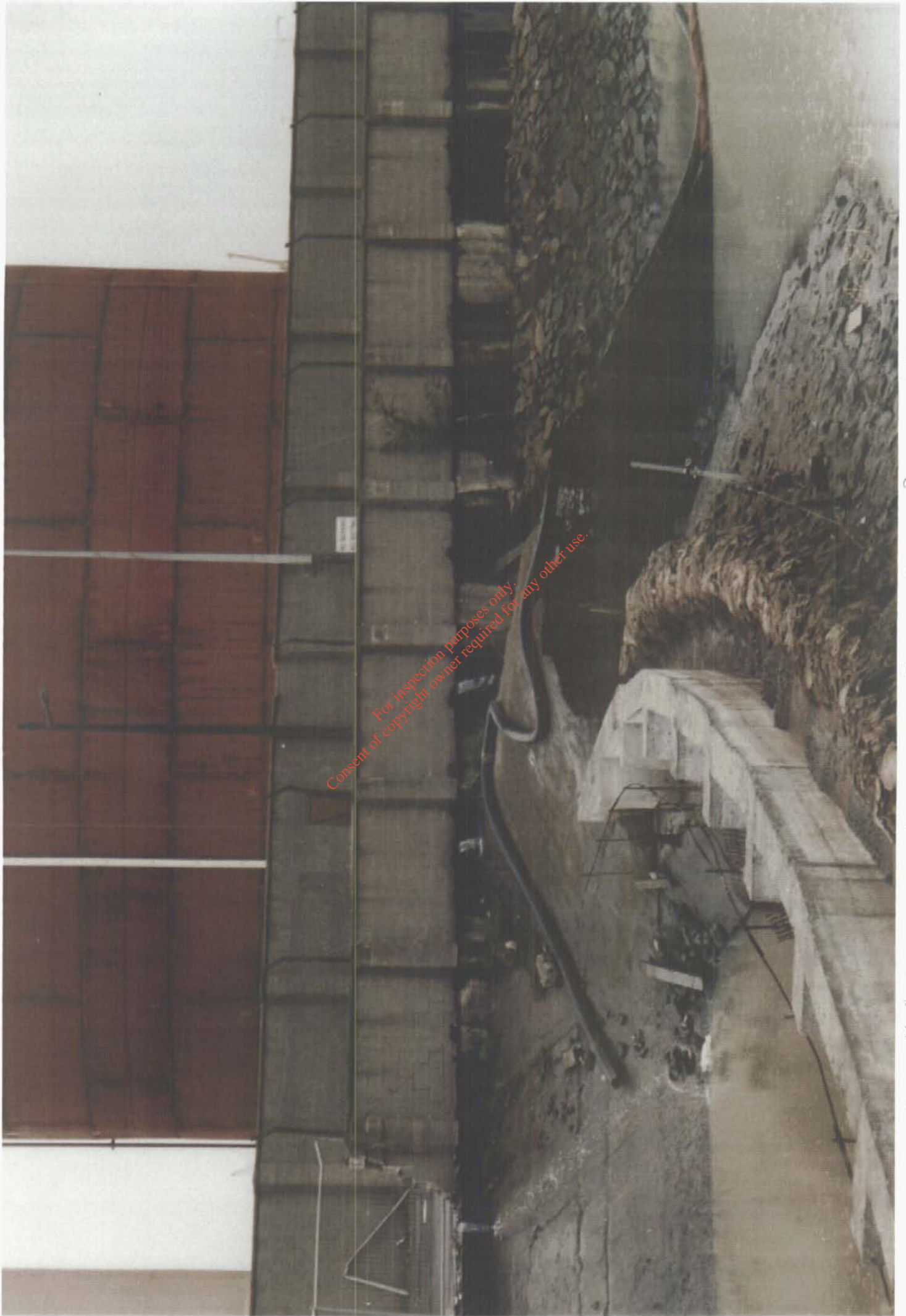
CH A NVEL 21st April '01



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4 21 01





OLD Oil Containers at IRISH ENCO Pigeon House Rd 2/14/04.



2015 April 15 1





Connection to Oil Tank 26th April 01

4 26 '01

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Hot Water Cooling Channel FE 3B. Runaround, Not in use !! The Runaround site is relevant



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5 / May 01



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MAY 01 Seaside, CA



Washing out the oil

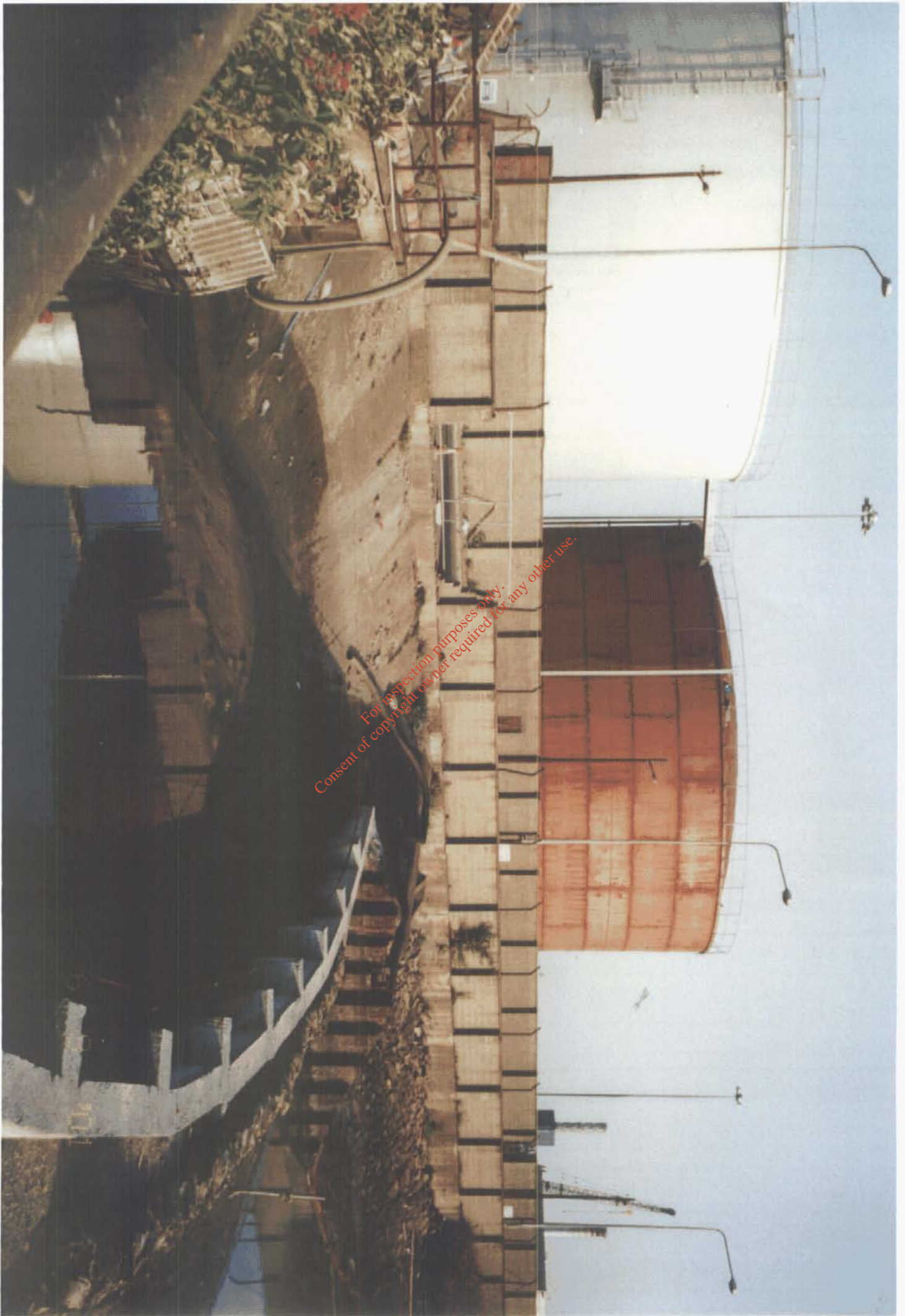
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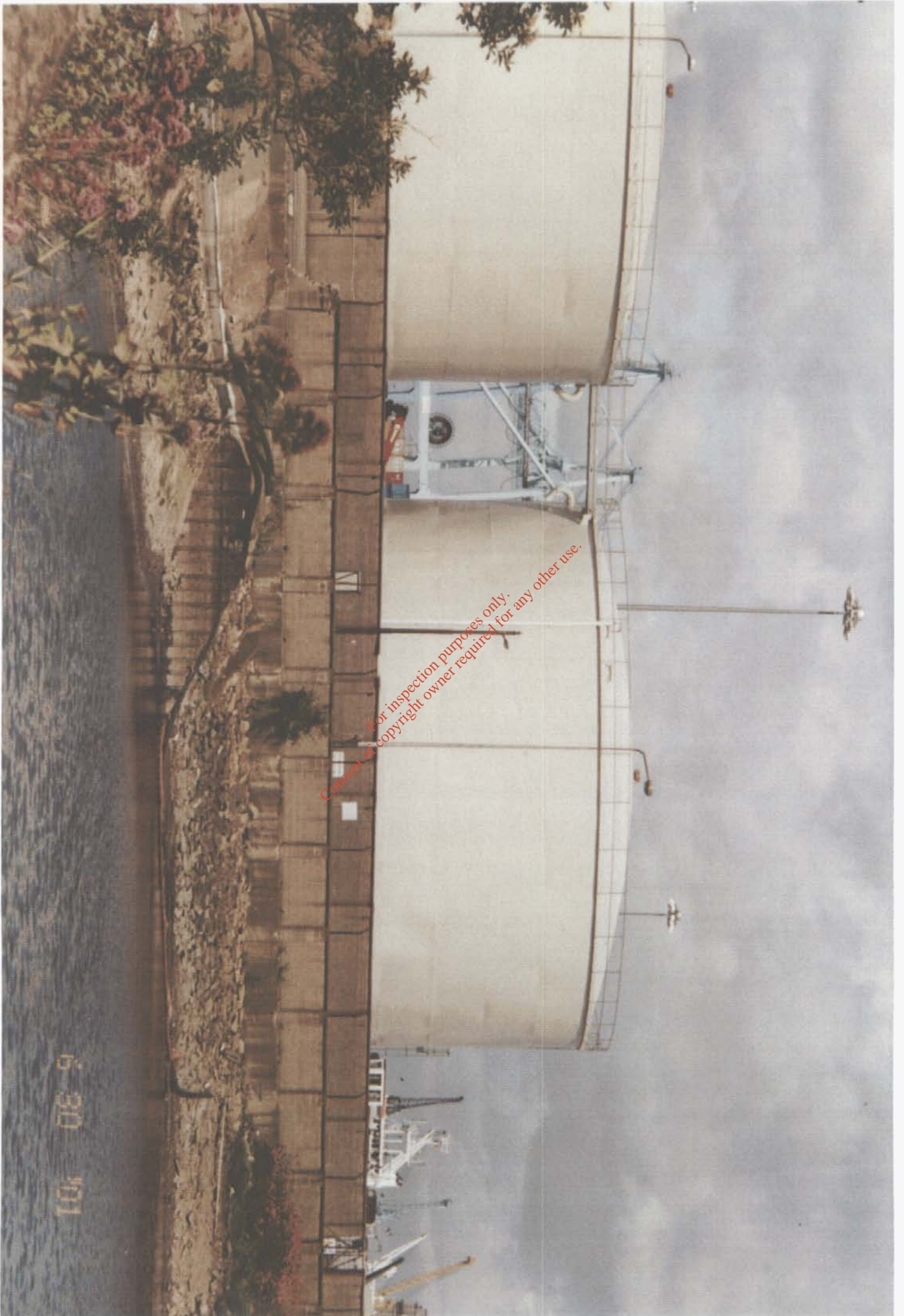


1 bank has been provided since June '01 Oil in which Chamber of oil fall 1





7:21p Oil measured by Volumetric Co., Linden





Sluice exit to channel, just west in yard, hole oil + gravel - Hercules Tyre

8 701

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Turdus + Peucaea muller

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8 7 0 1

oil bubbling up from water pipes

8 7 5 1

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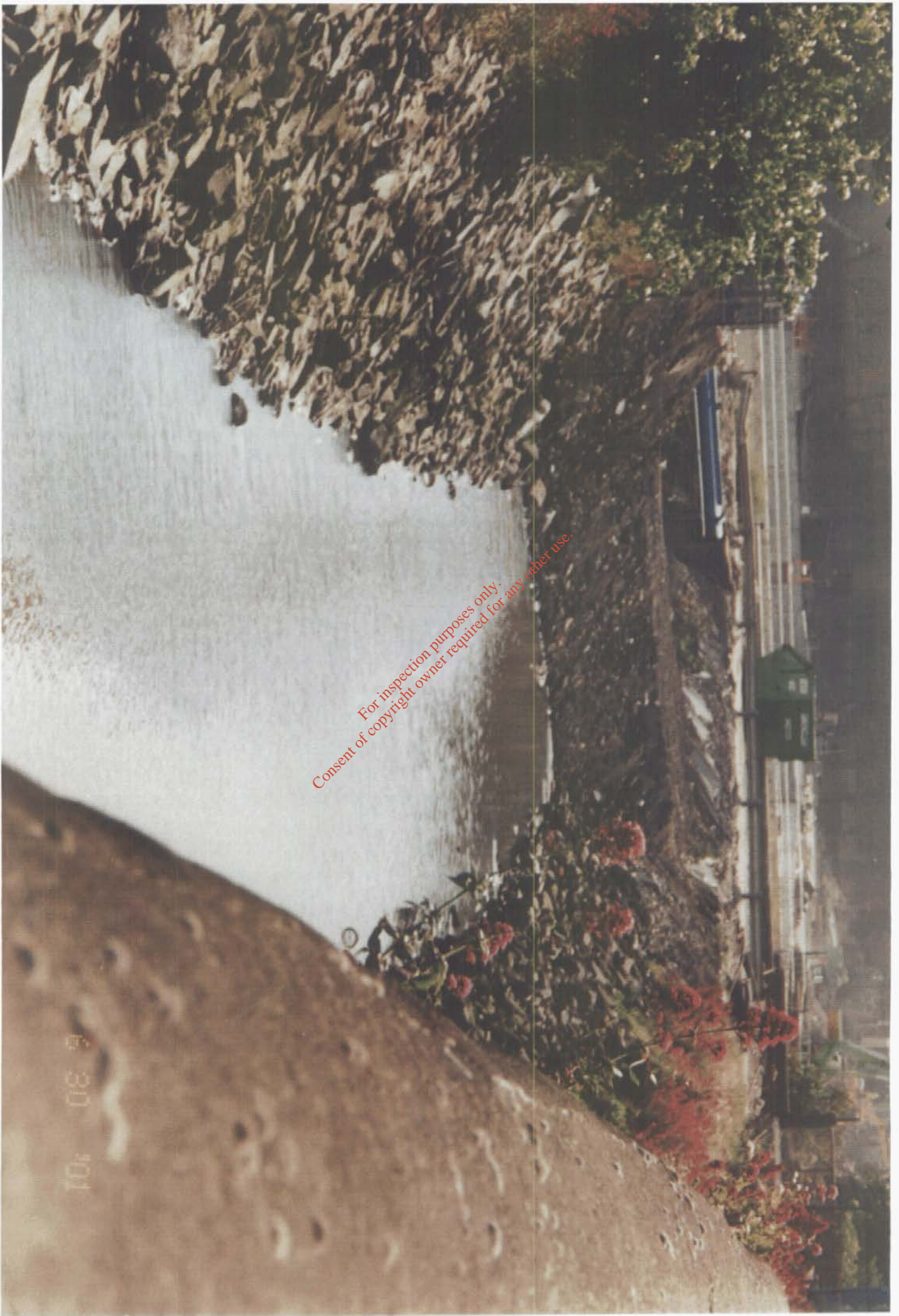
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Down in place events of 2011 June 18/1



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6 30 101





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From Packed across channel 30105 June 01

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