

Joe Reilly

From: Catherine O'Keeffe
Sent: 28 January 2008 17:05
To: Joe Reilly
Subject: FW: Licence Objection

Attachments: Submission on Third Party Objections to EPA Licence number W0232.doc



Submission on Third
Party Obje...

Joe

Received this 28/01/08 before 5 o'clock a submission on obj on Poolbeg.

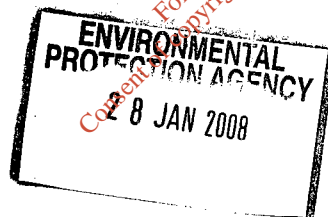
Cheers
Catherine

-----Original Message-----

From: claire.wheeler [mailto:claire.wheeler@o2.ie]
Sent: 28 January 2008 16:58
To: Catherine O'Keeffe
Subject: Licence Objection

Please find attached a submission for Ann Kehoe to Licence w0232-01 from Dublin City Council for and incinerator, as per our phone conversation From Claire Wheeler (for Ryan Meade and others in the Green Party)
address:- 27 Oaklands Park, Sandymount, Dublin, 4.

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Submission on Third Party Objections to EPA Licence number W0232-01
Development of a mass burn incinerator at Poolbeg by Dublin City Council.

Submitted by Claire Wheeler (Pembroke Green Party Group) on behalf of Ryan Meade and others

We wish to make the following submission in support of our objection to the granting of a licence.

1 The proposal is out of line with Government policy on Waste Management

This point has been made, not only by ourselves (Submission 14) But also by Deputy Ruairi Quinn, and by Dathai Doolan, Mary-Lou McDonald (Subm.7). The new Minister for the Environment has made it clear, from statements issued in the Dail which are available from the published Dail written record) that targets for the recycling and recovery of materials from the waste stream are being raised, and that MBT, ie mechanical and biological treatment following source segregation, is now national waste management policy. MBT technology is mature and is used extensively elsewhere in Europe. Officials at the Department of the Environment have published a study showing that the amount of residual waste (following MBT) to be disposed of nationally, will be of the order of no more than 400.000 tonnes per annum in the country as a whole, if waste reduction targets are to be met. We may also be facing recession, which would also be likely to reduce the amount of waste to be disposed of. Therefore the proposed incinerator is grossly over the capacity required for the greater Dublin region. Assuming that a third of the country's waste arises in the Greater Dublin region, the capacity of any incinerator should therefore be no more than about 133,333 tonnes per annum.

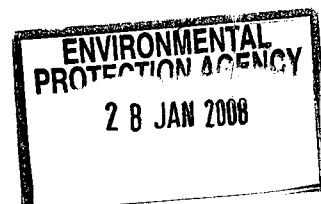
The EPA must have regard to national policy on waste management. If there is any ambiguity about policy, it is essential that written clarification be sought from the Department of the Environment.

We strongly object to the fact that there are no proposed embargos on material entering the incinerator, either on otherwise recyclable materials, or on specific hazardous wastes.

2 Energy considerations and Carbon Dioxide emissions

We submit that this proposal is out of line with Government Policy to reduce national Greenhouse Gas emissions by 20% on 1990 levels. Objection 9 by Joe McCarthy and Valerie Jennings submits that the proposed incinerator would have an unsustainable impact on the environment and that it would actually increase national CO2 emissions by nearly 2%. It cannot be justified by any arguments of producing electricity, since it is national policy not to have such dirty, carbon-rich electricity generation. It is more energy efficient to recover materials from the waste stream than to manufacture them from virgin raw materials.

The argument that district heating will be obtained from the waste heat is very weak as it depends on development which may never take place. In fact, for many years there has been a large amount of waste heat from the Power Stations in Poolbeg, for which there was never any market. Ireland's mild climate makes the use of waste heat in



district heating less attractive, and this would only be during the winter months, anyway. One of the volumes of the Waste Management Strategy for Dublin (1998?), the Engineering considerations volume, suggested siting any incinerator along the M50, so that there would be a potential of using the waste heat as process heat in industry, but this was subsequently ignored by Dublin City Council. As a member of the Community Interest Group, it is my opinion that DCC chose the proposed site first, and tried to justify it later.

The CO₂ released would have an immediate effect on the atmosphere, in contrast to emissions from a landfill facility. We believe that the use of clean waste to energy technologies, such as anaerobic digestion with generation of electricity from biogas, is preferable to incineration.

3 Effect on the Marine Environment

We strongly support submissions made by Catherine Cavendish, the Eastern Regional Fisheries Board (Submission 1) and others, expressing alarm about pollution affecting the fauna of Dublin Bay, most of which is designated for Bird conservation, and on the Liffey Estuary. We are strongly concerned about biocides in the cooling water to be discharged into the Liffey estuary, and the effect they will have on salmon smolts and sea trout at such a sensitive stage in their development, also on lamprey. We are concerned that the impact of Sodium Hydroxide emissions is unacceptable.

It is vital that the EIS be amended by an expert marine biologist to assess the likely impact of all discharges on the immediate and wider marine habitat. Such assessment should include the impact of any accidental discharges to air from the stacks or from for example, accidents with any component of the ash ending up in the Bay. We would point out that since Dioxin is bio-cumulative, any such discharges will have an eventual effect on the protected wild bird species. This point is also made by James Rountree.

4 Effect on Human health, -Nanoparticles

We strongly support the points made by Marco Salina and others (Objection 12), and John Hawkins (Obj 8) concerning the proposed emissions to air of very small particulate matter, pm_{2.5}'s and smaller. Siting such a large emitter of such nanoparticles, virtually in the middle of the State's largest population centre, is of huge concern. It is common knowledge that reputable recent research has discovered a definite and alarming link, that nanoparticles increase levels of cancer. This is not acceptable.