

OH Sub No. 66

PROPOSED DUBLIN INCINERATOR

OSING SUBMISSION

Recd From: *Maureen Ryan*

1st MAY 2008

Environmental Protection Agency

01 MAY 2008

ORAL HEARING

RECEIVED

The EPA Oral Hearing demonstrates that the proposed Dublin incinerator cannot be safely built in the present state of knowledge, and certainly not at Poolbeg.

If a licence must be issued for incineration for some reason not apparent it must be preceded by:

1. A new site selection process carried out without a preconceived result with full public consultation and supporting data made available.
2. A full baseline health assessment of the communities surrounding the proposed site.
3. A requirement for prior submission and full public examination of process flow sheets for the proposed facility including exact determination of all significant inputs and outputs. This must be done for every feedstock scenario for which the licence is sought.
4. Preparation of a completely updated EIS as the existing one is largely obsolete. This must be subjected to a quality assurance process.
5. An independent air quality assessment of the proposed area, including effects of all proposed ash transport scenarios, which have so far been ignored.
6. The dismissal of the objections of DCC to the draft licence.
7. The mandatory introduction of double bag filters as "Best Available Technology".
8. The vesting of ultimate control of the facility in an independent authority with full powers to terminate operations in case of need.
9. The establishment of an adequate and comprehensive fund for the assessment of any community health issues arising from the operation of the facility, and a separate trust or insurance fund to give adequate cover for all such eventualities.
10. The stipulation of much more comprehensive measuring and control, including measurement of raw flue gas parameters as done in Amsterdam.
11. The stipulation of full "always on" backup for essential measurement and control systems.
12. The stipulation of much more frequent independent monitoring of critical variables.
13. The imposition of much more stringent controls on categories (if any) of sludges that can be introduced as feedstock.

It does not seem that there are any circumstances under which the proposed Poolbeg site could safely be used, but if in some strange circumstance it were felt necessary to impose an incinerator on the unwilling communities and sensitive habitat at risk then further conditions should be inserted:

1. Condensation of used steam shall be by air-cooled condensers, thus fulfilling the requirements of the relevant Fisheries Authority that no further sources of pollution be introduced to the Liffey River system. This simple change would obviate all risk of biocide and thermal pollution and reduce civil engineering costs.

2. A full scientific assessment (not an "opinion") of the potential for disturbance of protected wildlife should be conducted by an independent expert of international standing comparable to the importance of the threatened species before any development is allowed to commence.
3. A full investigation of the possible effects of all existing plans and/or "visions" for future development of the Poolbeg peninsula, including the predicted effects on air quality.

For inspection purposes only.
Consent of copyright owner required for any other use.