

OH Sub No. 39

Environmental Protection Agency

21 APR 2008

Recd From: Lorna Kelly

ORAL HEARING

SANDYMOUNT & MERRION RESIDENTS ASSOCIATION

Submission to oral hearing re. proposed Poolbeg (Ringsend) incinerator, 2007.

Introduction.

During this hearing reference has been made to incineration plants located in a wide variety of situations in other countries, none of them analogous to this particular site. We submit that it is the suitability of a site on the Poolbeg Peninsula for this proposed mass burn incinerator which An Bord Pleanála is being asked to consider, - not the question as to whether it is necessary or desirable to incinerate waste in the absence of a comprehensive national policy for prevention of wastes arising.

At no time throughout this hearing have we been presented with any evidence of an incinerator sited in an area with similar physical characteristics in terms of soil, water table, limited access, close proximity to a salmonid river and areas designated as SPA and SAC, and the particular climatic conditions pertaining to this area, any one of which in our opinion make the "Poolbeg peninsula" unsuitable for this type of development. The site appears to have been selected purely on the basis that it was first zoned industrial in 1971 because of its intended future use for specific port purposes once reclamation from the sea would have taken place.

The industrial zoning was continued in all following Development Plans for the City but its specific use was clarified in the revision of the 1976 development plan in 1979. [copies of documents attached - appendix A]

Port industry definition was clarified in para 2.9.4. as industry that must require:-

- (1) a tidal water location e.g. ship repairing
- (2) require large quantities of sea water in the industrial process and
- (3) are heavily dependent on use of port facilities because :
 - (i) raw materials/finished products are moved in large quantities,
 - (ii) raw materials are obtained solely or substantially from foreign sources,
 - (iii) The industry is primarily sea export orientated and requires sea transport

Land reclaimed from the sea and beach at Sandymount not required for use by Dublin Port and Docks Board (now Dublin Port Company) for port uses was to be reserved as park land and open space.

Similarly the tripartite agreement for the exchange of lands and foreshore at Sandymount dated May 11th 1972 stated "...the said parties for the purposes of enabling them to carry out their respective functions more efficiently..." and must we believe, in the case of the Port, refer to the duties and functions of the Port authority as laid down in the relevant Harbours Acts legislation.

From the examples of incinerators sited in e.g. Sheffield and Copenhagen it is clear to us that a port and/ or seashore location is not a necessary/ essential requirement for the siting of an incinerator. It seems to us equally clear that the present Z7A zoning of the site excludes incineration and is in line with essential port uses.

AREA RECLAIMED BY RORT & DOCK'S BEG
AREA RECLAIMED BY ESB.

North Bank Lighthouse - a Beacon Tower
(Occulting White)



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Plume photographs included in Imelda Shanahan's evidence were (as far as I remember), examples from Australia. We are submitting plume photographs taken on the Poolbeg peninsula in what we consider to be good weather conditions for the assistance of An Bord. There are also two photographs of localised sea mist which is not a rare occurrence here, and some taken during a fire on a site beside the cooling water channel - (appendix D)

Residues.

The proposed transport route, storage, treatment and disposal of bottom ash once it has left the site of the proposed incinerator remains uncertain.

During this hearing we have been told that it will be stored on site for one month before being taken to a south bank berth for trans-boundary shipment overseas. It was not clear to us how possible spillage between lorry and ship would be dealt with or who would be in control.

Conversely, we have also been told that it will go to an engineered landfill in Fingal. In that case we have been given no detail as to how long it will be stored, how any leachate will be dealt with, or what further treatment it will possibly undergo. Bottom ash from incinerators in other countries is normally stored in an engineered facility for at least three months before final disposal or any re-use.

In Westpoort, Amsterdam, a special plant now exists for further treatment of bottom ash, including removal of residual metals before any further use. Due to new more stringent Dutch regulations its previous uses in road construction and building in the prior permitted state have had to be reconsidered and pilot projects were put in place in 2006 using it in bund walls for engineered landfill and treatment cells after additional treatment. (Source: AEB Annual report 2005.)

(The same report records some problems encountered with unburnt or improperly burnt waste in the incinerator as a result of the introduction of sewage sludge.)

The 2001 National Waste Management Plan deals with the issue on page 68, quote "In the event of a thermal treatment facility (whether for municipal non-hazardous or hazardous waste) being constructed, a hazardous waste landfill will be required for ash." On the basis of this it would seem that the bottom ash will be transported to Fingal and landfilled. There is no additional treatment facility or legislation in regard to the quality of bottom ash for reuse in construction projects in Ireland as far as we have been made aware.

Natural Environment

The surveys of the natural environment, by virtue of the briefs given, are in our opinion inadequate and incomplete. Obviously the actual site has no special biological value. A qualitative analysis, at least, should have been done on the Poolbeg peninsula, particularly in regard to the Nature Park and embankments to give a comprehensive picture of the ecological value of the land areas comprising the peninsula. Similarly a survey of wintering waterfowl does not give a complete evaluation of all avian species throughout the year. The SPA designation was not solely for Brent geese although their importance is not to be underestimated. The division of the environmental surveys into terrestrial and aquatic resulted in the omission of the splash zone between the two surveys.

There are other aquatic birds, terns nesting on the dolphins in the Liffey and using the Sandymount strand habitat, little egrets, redshank, ringed plover, redbreasted merganser, nationally important numbers of oystercatcher, curlew, turnstones, dunlin, knot, greenshank, nesting shelduck etc which have been largely ignored

Irishtown Nature Park has over 200 varieties of flora, is habitat for stonechat, ~~linnet~~ linnet, skylark, wheatear, amongst others which are not garden birds. There are several species of fungi, (photographs of some are appended), and the park hosts a wide variety of insects including the two species of endangered bee already referred to in this hearing, as well as nine species of butterfly and snails such as Hellicella. The reason for their existence here is simply because it has not been overmanaged. It is an excellent example of a very biodiverse habitat not to be lightly dismissed.

Any management should be minimal and sensitively done. Any surveys which have been done have been by NGO's such as the Naturalists Field Club and by local people, backed up by photographic evidence. Heavy machinery causes damage to the paths and aids the spread of invasive species when cut or broken pieces become attached to tractor wheels.

The banks beside the path to the Nature Park from Sandymount host summer migrant birds, swift and martins, and the flora includes orchis pyramidalis and blackstonia. Kestrels are presently nesting nearby.

There has been no survey of the flora of the rock walls at Merrion which is much nearer than the Canal.

"The need to preserve biological diversity is now universally recognised, both in the Convention on Biological Diversity agreed in Rio on 5 June 1992 and in the Action 21 programme also adopted in Rio on 14 June 1992 and reconfirmed in Johannesburg on 4 September 2002" source Naturopa no. 101 of 2004. More recently Ireland hosted the conference in Malahide.

"It is essential to lay down principles since these establish attitudes and help to guide the way in which states behave in making economic and political choices affecting the environment. The principles of prevention, caution and sustainable development underpin all the obligations with which the contracting parties to the Bern Convention undertake to comply. The first is based on the old maxim "prevention is better than cure" and the second on the notion that where there is a risk of serious or irreversible damage, the absence of absolute scientific certainty must not serve as a pretext for postponing the adoption of effective measures to prevent the degradation of the environment."(source-Naturopa issue 101 of 2004. issued by the Council of Europe, Directorate of Culture and cultural and Natural Heritage.)

Throughout this hearing there has been much emphasis placed by DCC on monitoring the effects of the construction and operation of this proposed incinerator. In itself this is, we submit an acknowledgement that there is a possibility of adverse effects. Monitoring does not prevent damage, it only records what has happened. This proposed development beside an SPA/SAC/pNHA which in its construction will displace protected birds, will disturb and release sediments into the estuary of a salmonid river and which also has a definite potential to harm the biodiversity of adjoining and nearby areas is we believe where the principles of prevention and caution should be applied.

(Baseline survey- While we accept that the construction storage area is bare, or almost so, at this point in time, we wish to lodge photographs from 2000 prior to its stripping for the pipelaying area for the waste water treatment plant and its ongoing history if only to illustrate what would occur if it were not subjected to any further damage. It is, as Karen Dubsy has evidenced, an essential habitat area for waterfowl.) appendix E.

District Heating.

The entire Poolbeg peninsula is composed of waste materials, much of it hazardous. Within the landfill is hospital waste, lorry loads of rejected carcasses and offal from meat packing plants, waste from laboratories, waste from a dye works, drums of chemical wastes of unknown origin, discarded electrical and white goods, batteries, and municipal wastes, which included discarded pesticides and herbicides, scattered at random throughout.

A trench to accommodate the large diameter pipes for the provision of district heating from an incinerator on this site can only take two alternative routes; either via the Pigeon House Road or through the "dump" areas to the south and southwest to South Bank Road and on to the City. To serve an area near Merrion Gates the shortest route would be across the designated beach habitat. None of them, in our opinion, are realistic in view of the problems that would be involved, in addition to the indisputable fact that the base of the trench would encounter a water table that is subject to tidal influence.

Flooding

To avoid any probability of the site flooding the developers propose to raise the ground levels to an even, overall height of 5m.OD Malin Head, (the waste bunker is lower,) and also refer to the future building of a sea wall if such is found to be necessary to protect the site. The infilling of the original main channel and of the strand in the 1960's and 1970's has resulted in the main force of the incoming tide being funnelled towards Sandymount, particularly at the Marine Drive/Strand Road corner, with consequent increase in frequency of flooding of lower lying roads in Sandymount. In addition the vast acreage of foreshore between Sandymount and Ringsend, previously available to accept the extra influx of water during exceptional high tides is no longer there. As long as the infilled land of the Poolbeg is at or below Strand road level of approximately 3.5m the sea can overflow on to it. The ability of the sea to infiltrate the reclaimed land through the rock armoury also provides some alleviation. The recent practice of raising ground levels anywhere on the peninsula protects these contaminated lands at the expense of Sandymount, exacerbating the effect of sea level rise due to climate change. That is why we object to *any* development on the reclaimed land which involves raising ground levels and hard surfacing and/or any further reclamation of the designated beaches. Raising the sea wall at Sandymount and Merrion by a metre would be costly and lead to a domino effect on other adjoining coastal lands and rail line at Booterstown, Williamstown and Blackrock. It is not a viable or sustainable option.

Even in the simple terms of waste vehicles travelling directly to the proposed site, there is, in our opinion, the distinct probability of the site becoming isolated from its surroundings by flood waters.

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RINGSEND TREATMENT WORKS – ODOUR UPDATE

Briefing note to City Councillors

Arising from odour emissions at Ringsend Treatment works in 2004/2005, Dublin City Council initiated the implementation of an Odour Action Programme, commencing in March 2006.

Phase 1 of the Odour Action Programme was progressively implemented during the Summer of 2006, resulting in an improvement in the situation and a reduced level of complaints from local residents.

Phase 1 has been partly implemented, and the two remaining issues are presently being actively pursued.

These are:

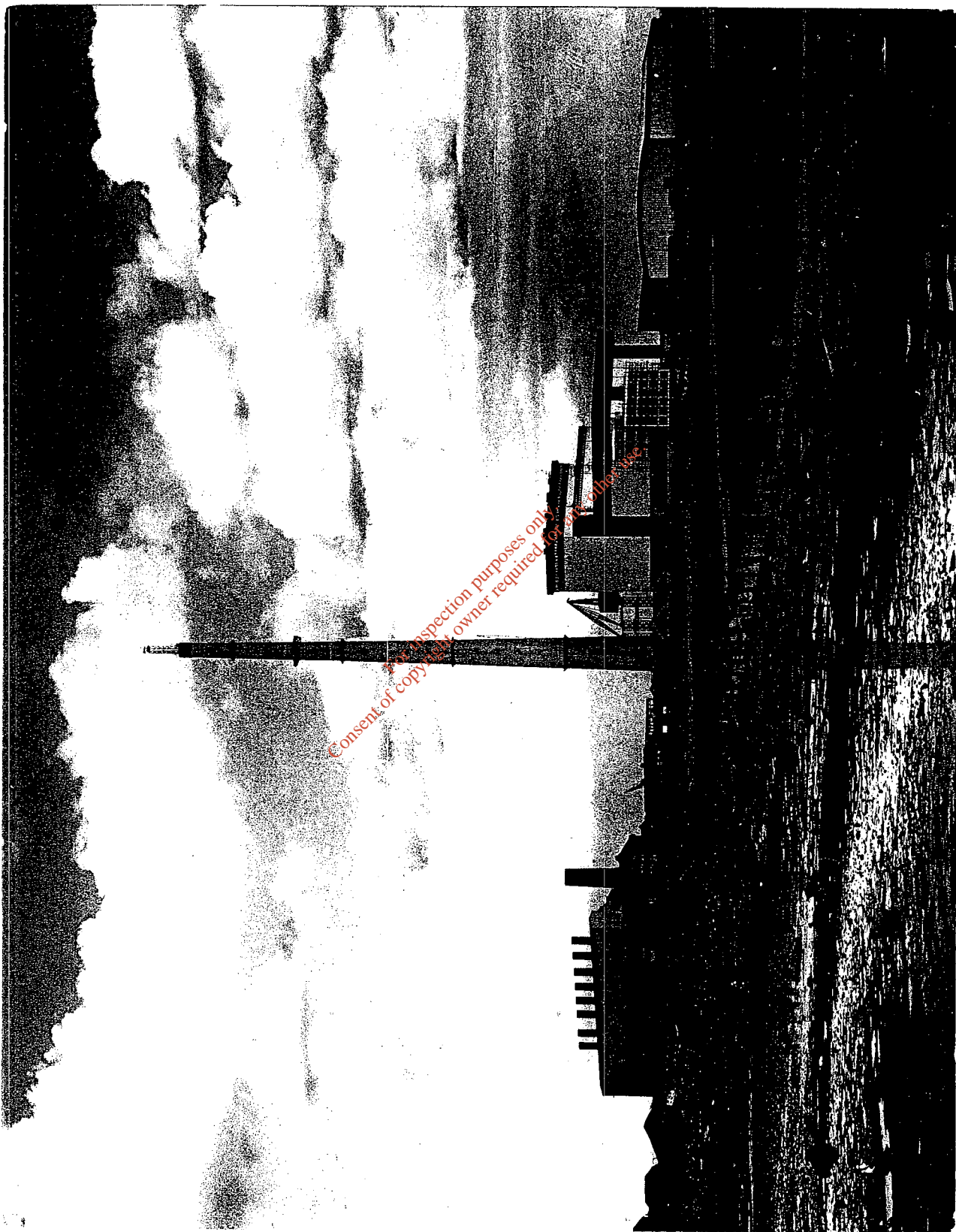
- The covering of the remaining open lamella (primary treatment) tanks and the installation of additional Odour Control Units (OCU's) for these tanks.
- The provision of new enlarged combustion chambers to the sludge dryer units.

The recent odour emissions from the Works originated from the sludge dryers, and were exacerbated by the prevailing atmospheric and wind conditions (continuous North Easterly winds). The Council regrets the nuisance caused to local residents over the period in question (March 23rd – April 3rd 2007). Should such unfavourable weather conditions be predicted again in the short term (pending the completion of the remaining two items on the Odour Action Programme), then the Operations Contractor will produce alternative sludge product without the need to use the dryers.

The timescale for the remaining Phase 2 Action Programme is as follows:-

- The 3 sludge dryers will be progressively fitted with new combustion chambers, for completion in July 2007, September 2007 and March 2008.
- The lamella inlet and outlet channels, and the launder channels, were covered over and fitted with Odour Control Units in 2006. Work on the 12 lamella tanks will be completed progressively, starting in February 2008 and completed in November 2008. The above will complete Phase 2 of the Odour Action Programme commenced in 2006.

Definition of "Port
Industry" &
purpose of agreement.



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Reclamation of Sardinian Island with municipal & industrial & other wastes in the 1970's
Area reclaimed was later called the Pookey peninsula



Pigeon House Rd.
(Bell Alley)

Waste dumping on Sandymount Strand. 1970's

Appendix A.

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Roinn Rialtais Aitiuil,
Baile Atha Cliath.
5 September, 1958.

City Manager and Town Clerk,
Dublin.

A Chara,

I am directed by the Minister for Local Government to refer to your letter of the 21st instant (? July) regarding the exchange of lands in the Ballyfermot Upper area between the Corporation and Mr. D. C. Moynihan and to state that, on submission of the Deeds of Conveyance, he will be prepared to signify his consent by endorsement thereof.

Mise, le meas,

J. KAVANAGH.

It was moved by Councillor Larkin, T.D., and seconded by Councillor Brady, M.P.S.I., T.D., P.C.: "That these letters be entered on the Minutes": The motion was put and carried.

281. The following letter was read:—

City Hall.

6th October, 1958.

The Right Honourable the Lord Mayor,
Aldermen and Members of the Dublin City Council.

At the monthly meeting held on the 11th August, 1958, you passed the following resolution, viz.:—

"That Council requests a report be furnished to the October meeting on the plans for the improvement of Sandymount Strand, together with an indication of the area of the strand which is to be reclaimed by the present method of refuse dumping, or by any other method."

The Town Planning Scheme envisages the reclamation of approximately a further 500 acres in the Sandymount sea front area. Generally speaking, it is envisaged that the development will take the form of—

- (a) user by the Dublin Port and Docks Board of all land required for port purposes, and
- (b) the reservation of the remainder as park land and open spaces.

This is a long term project and no detailed plans have been prepared. Reclamation work would be subject to the general control of the Port Authority. Following discussions with the Port and Docks Board, it is understood that that body is preparing to acquire all the area proposed to be reclaimed.

T. C. O'MAHONY,

Deputy City Manager and Town Clerk.

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7 August, 1958.

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M. LAWLESS.

12th July 1971

A Chara

I wish to thank you for your recent communication about the invitation extended to me by your Association to visit the Sandymount area. You will be glad to learn that I visited the area in the company of the Minister for Transport and Power on Friday, 9th July.

I fully appreciate your concern about developments in the Sandymount area and you may rest assured that as Minister with overall responsibility for physical planning, I am very concerned to ensure that any development that is undertaken in the area will take full account of the extremely important amenity values of Sandymount and the Dublin Bay area generally, as well as the other important planning considerations involved. I have made my concern about this matter known on a number of occasions, in replies to Parliamentary questions and otherwise.

I have explained the position as far as I am concerned several times, and it may be helpful if I summarise this for you:-

- (1) The primary responsibility for the planning of the physical future of Dublin, including the preservation of the amenities of Dublin Bay, is vested by law in Dublin Corporation.
- (2) The Corporation's policies and development objectives are set out in their draft development plan. In the draft plan, the Corporation express the opinion that the ultimate size to which Dublin port should develop is a matter of national policy.

The draft development plan does not involve any approval by the Corporation of any plans by the Dublin Port and Docks Board, either short-term or long-term. It accepts that the limited amount of reclamation already authorised by the Minister for Transport and Power will probably be completed and it illustrates the uses proposed by the Corporation for the reclaimed land. Provision is made for the reservation of parts of the reclaimed areas as amenity open spaces to serve as buffer zones between the areas designated for port development and the residential areas of Clontarf and Sandymount. As regards the use of any of the reclaimed land for industrial purposes, the Corporation's policy is that any industrial or commercial development that may be permitted will be restricted to "port industry" i.e. industry which, in the opinion of the Corporation, must be located in the vicinity of the port and cannot function economically elsewhere. In examining any proposals for port development, the Corporation will take special account of amenity considerations. The making of a Special Amenity Area Order for Sandymount Strand is to be considered by the Corporation.

- (3) Over 1,400 objections and representations relating to Dublin Bay were received by the Corporation after the draft plan went on public display. The bulk of these were not concerned with the provisions of the draft plan, but with the long-term proposals for reclamation and development (including major industrial development) published by the Port and Docks Board in 1965. It has frequently been explained that these proposals were in outline form and were not intended to represent a definitive plan for the port area. The Board have assembled a planning team to work out definite long-term plans for the port and I understand that when the plans have been approved by the

and Power and to the Dublin Corporation and put on public display. The plans will be subjected to the most detailed scrutiny by the Government Departments concerned, in the light of local, regional and national considerations, including, of course, the vitally important amenity considerations involved. The Corporation would naturally be very much involved because of its statutory functions as planning authority. Associations such as yours will have the opportunity to make their views known.

- (4) I have been asked on a number of occasions to declare Sandymount Strand or the Dublin Bay area generally to be a special amenity area, and I have pointed out that the initiative in this must come from the Corporation. Their power to make a special amenity area order is under section 42 of the Local Government (Planning and Development) Act, 1963. Section 43 of the Act provides for the giving of public notice, the making of objections to me, the holding of a public inquiry into objections, etc. If I decide to confirm the order, my confirmation order has to be laid before both Houses of the Oireachtas. You will understand that I cannot be expected to take the initiative on this aspect of the problem on the one hand and act as appellate authority on the other.

I hope you will agree from the foregoing that everything possible is being and will continue to be done to safeguard the interests of residents of Sandymount and to ensure that their views on the development of the port area are taken fully into account.

Mise le meas

Robert Molloy

Ref. No.	Subject Matter	Description of Amendment	Reason for Amendment
248.	Offices	<p>(b) The following foot note shall be added to Table 3.3.2. and referenced to all office Categories.</p> <p>"Offices which conduct a considerable amount of cross-counter type trading transactions with the public e.g. branches of banks, building societies etc. are not permitted in areas having a 'B' zoning objective".</p>	<p>(b) To protect the environmental character of areas with a "B" zoning objective.</p>
249.	Pool Halls.	<p>Last sentence of definition of "recreational buildings" (Appendix A of Written Statement) to be amended to read as follows:-</p> <p>..... but may exclude dance halls, band halls, discotheques, pool halls, funfairs, etc. and other uses undertaken on a commercial basis.</p>	<p>To clarify definition of recreational building.</p>
249.	Port Industry	<p>Paragraph 2.9.4. to be amended to read as follows:-</p> <p>"..... cannot function economically elsewhere. In general, in order to qualify for port industry they must require</p> <p>(1) a tidal water location e.g. ship repairing.</p> <p>(2) require large quantities of sea</p>	<p>To clarify definition of port industry.</p>

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Ref. No.	Subject Matter	Description of Amendment	Reason for Amendment
Port Industry.		<p>(3) are heavily dependent on use of port facilities because:</p> <p>(i) raw materials/finished products are moved in large quantities.</p> <p>(ii) raw materials are obtained solely or substantially from foreign sources.</p> <p>(iii) the industry is primarily sea export orientated and requires sea transport.</p> <p>The following additional paragraph to be added:-</p> <p>"2.9.8. The policy in respect of "Port Industries" shall apply to areas eastwards of East Wall Road on the northern side of the Liffey and eastwards of Ringsend Park and Beach Road to the south of the Liffey".</p>	<p>To clarify the area affected by the policy relating to port industry.</p>
250.	Private Recreational open space, development on.	<p>Par. 2.7.1. to be amended by the addition of the following:-</p> <p>"In exceptional cases where development of a residential, commercial or industrial nature is permitted on private recreational open space, provision of open space in excess of the normal standards will be required".</p>	<p>To protect the amenities of the area.</p>

Appendix B.

Photo. 1 - Pitch and putt course - ESB land accessed from Shellybanks Road.

Photo 2 - Marking indicating drainage point on to Sandymount Strand

Photos 3 - Green dye in channel on beach.

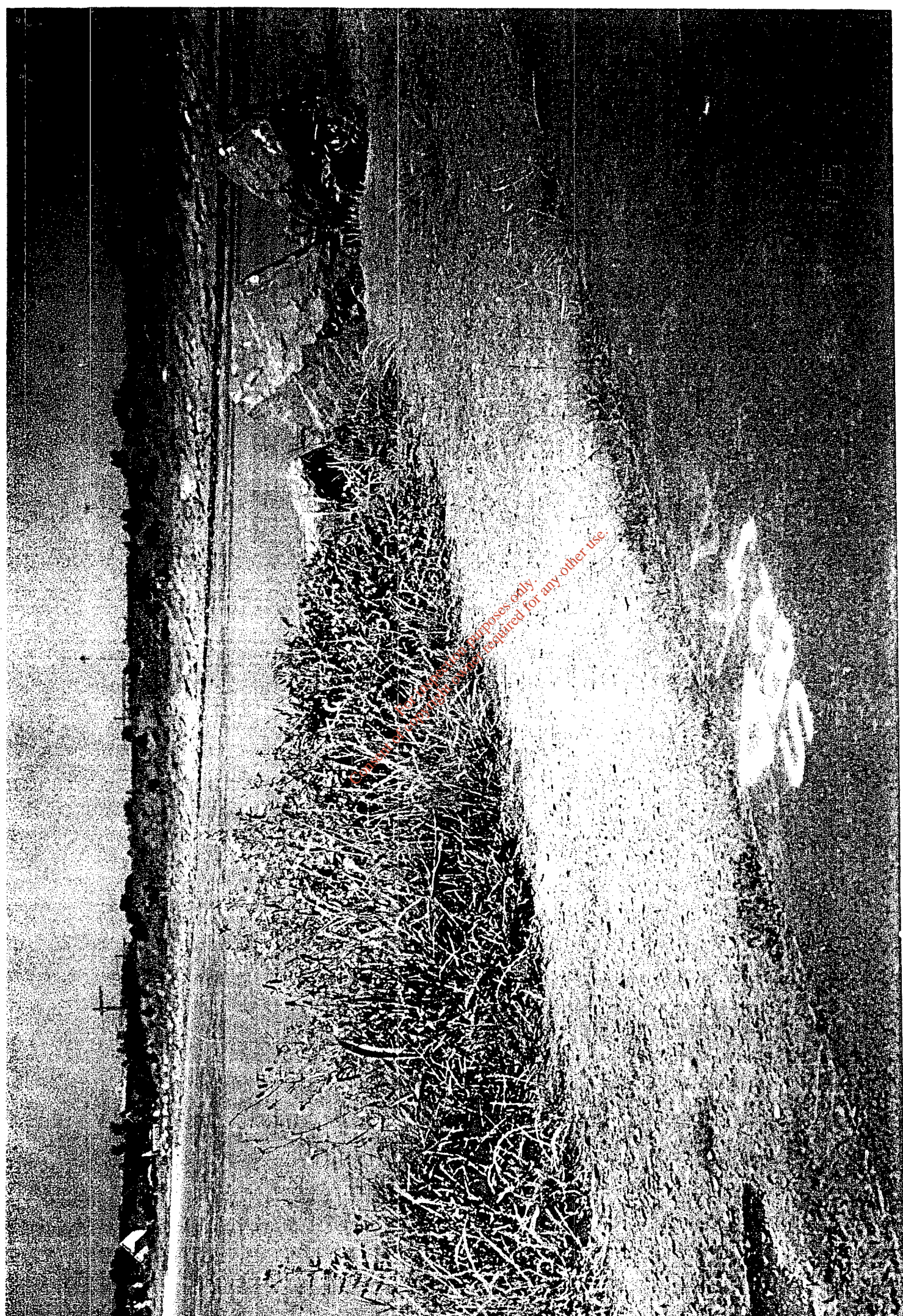
Photo 4 - View of pipelaying construction site for Ringsend sewage plant [WWTP]

Photo 5 - Run off from Kilsaran yard

Photos 6 & 7 Drainage onto beach.

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ESB International

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www.esbi.ie

Planning Department
Dublin City Council
Civic Offices
Wood Quay
Dublin 8

23 November 2006

Planning Application

Site Accessed from Shellybanks Road, Ringsend, Dublin 4

Dear Sir

On behalf of Electricity Supply Board (ESB) I hereby make application to Dublin City Council in respect of a site comprising lands accessed from Shellybanks Road, Ringsend, Dublin 4.

I enclose a Schedule of Documents indicating the contents of the application and a cheque to the value of €600 payable to Dublin City Council in respect of the Planning Fee.

The site is part of ESB owned lands that were formerly Ringsend Generating Station. A significant portion of the latter is now occupied by Dublin Bay Power plant which is operated by Synergen. Remaining ESB lands comprise part of the remaining portion of the disused generating station main building, a high-voltage substation that is a key node in the 110 kV power transmission network, an oil tank farm that provides extensive oil storage facilities and a former staff recreational area at the southeast. This area is identified as "Pitch & Putt Course" on drawings relating to the general area, although this use is long since ceased. It is this area that is the subject of this planning application.

Shellybanks Road is to the east and the area is bounded on the south by an unnamed continuation of South Bank Road that has premises operated by Roadstone and others and provides access to unoccupied lands owned by Dublin Port. Lands on the opposite side of Shellybanks Road are proposed for the Dublin Waste to Energy project.

Most of the site is low-lying and is recently prone to occasional flooding at high tides due to off-site damage to site drainage arrangements. The proposed development entails raising the ground level within the site to match that in surrounding and adjoining areas. The completed area, which will be unpaved, will be used for open storage.

It is envisaged that suitable filling material will be available from within the ESB owned lands during the planned demolition of the remaining part of the former power station building, which essentially comprises the former administration block. Voids created there by the



Directors Paul Duignan Pat Fenlon John McSweeney John Redmond

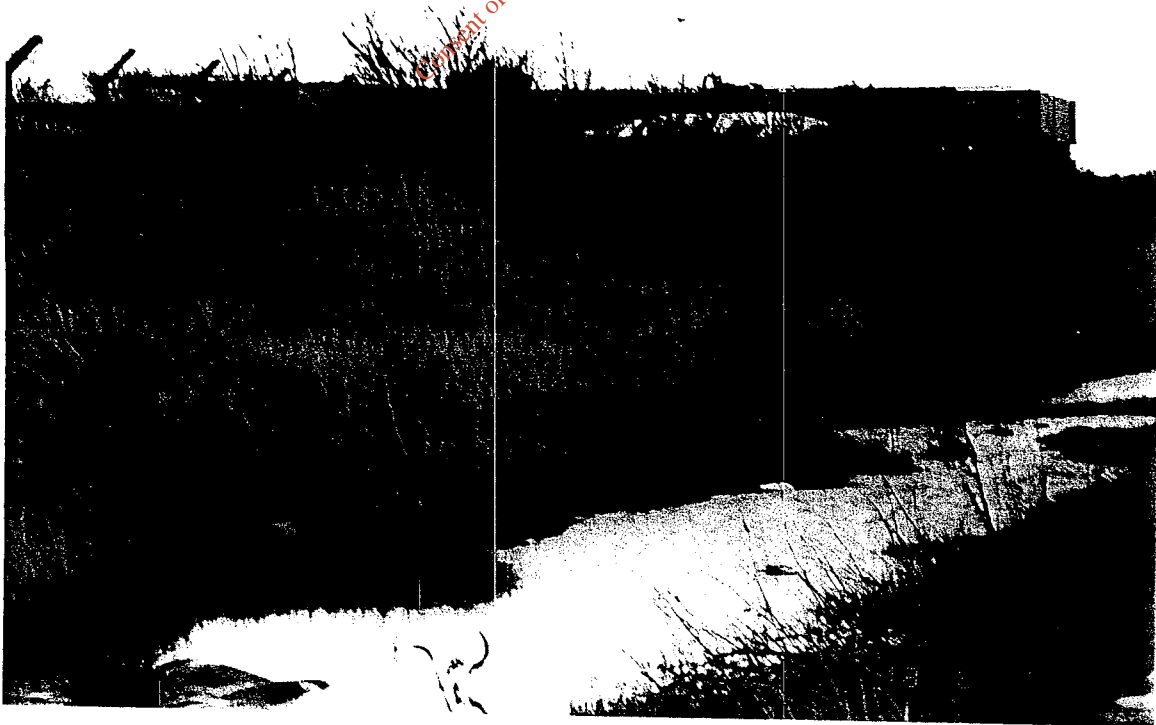
Registered Office 18/21 St Stephen's Green, Dublin 2, Ireland Registered in Ireland No. 155249

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Appendix C

All photos pertain to Pigeon House Fort.

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Extracts from journal "All Year Round" of 1864 and 1865 edited by Charles Dickens, re. Pigeon House Fort.

"Should a stranger, after seeing the principal sights of Dublin feel inclined to have a look at the harbour defence, he can get on a car at the monument in Sackville Street, cross over Carlisle Bridge, pass the theatres and on to Irishtown, through Rings End, after which he will be driven over a narrow road, on a long spit of land which runs into the sea for about a mile and a half and where it widens, a little near the extremity, he will find the Pigeon House Fort.

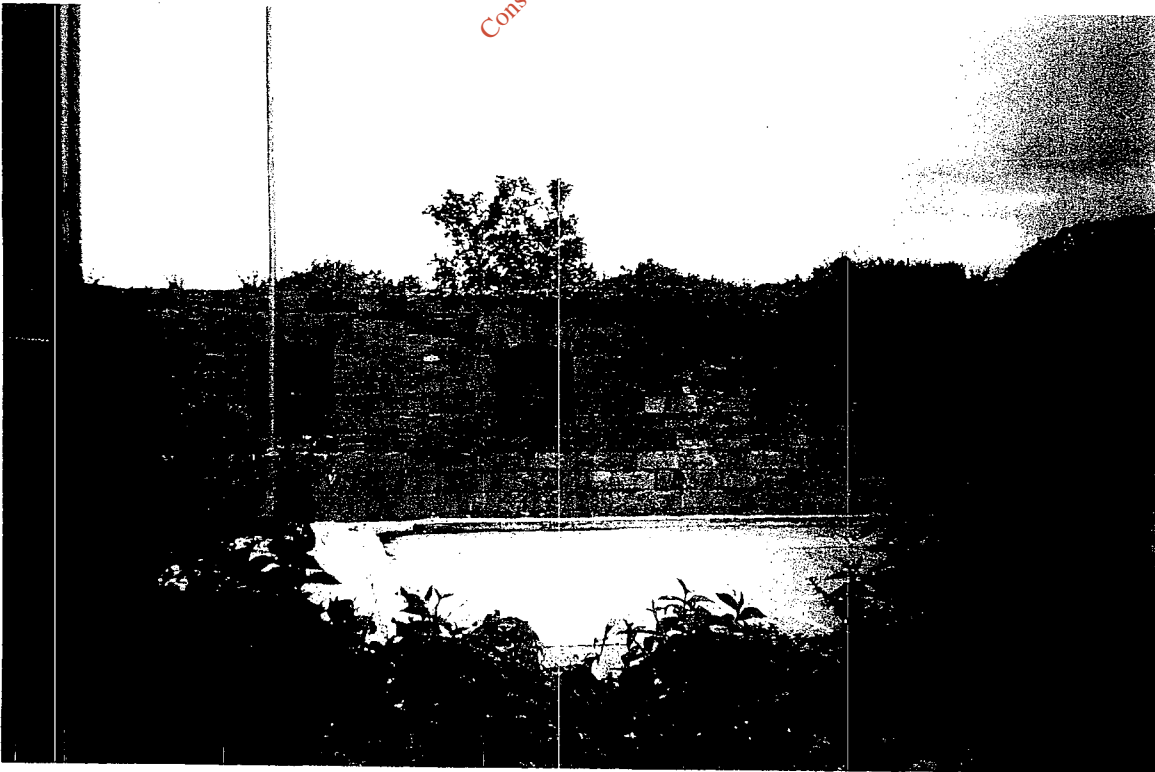
When he gets over to the fort he will observe upon his left the remains of HMS *Mermaid* brought here from Portsmouth, cut down and converted into a store. Then comes a row of palisading, and next a drawbridge, crossing which, and passing under a gateway, he will find himself in a small courtyard with cannon pointed, commanding the road he has come; then through another gateway, and he will be in an oblong square, where he will find a Flagstaff and a couple of thirty-two pounders."

A year later in 1865 he revisited the fort and describes the changes made in its defences. "Of a Sunday, only a few days back, I walked out in this direction and it had the charm of being a lovely and solitary walk. The previous night had been an angry one, and the waves were heavy and sullen, and the breeze was sharp and strong, and far off the "white horses" were riding about furiously. The long pier did not seem encouraging. But, pushing on to get a nearer view, I found the old Pigeon House altogether metamorphosed. It was like a pantomime trick. Some military harlequin had come with his wand and touched the place. There were stockades and outposts. The old guns had been refurbished up and their old open jaws grinned down the road with an air of menace. The battlements glittered with soldiers and the drawbridge was up".

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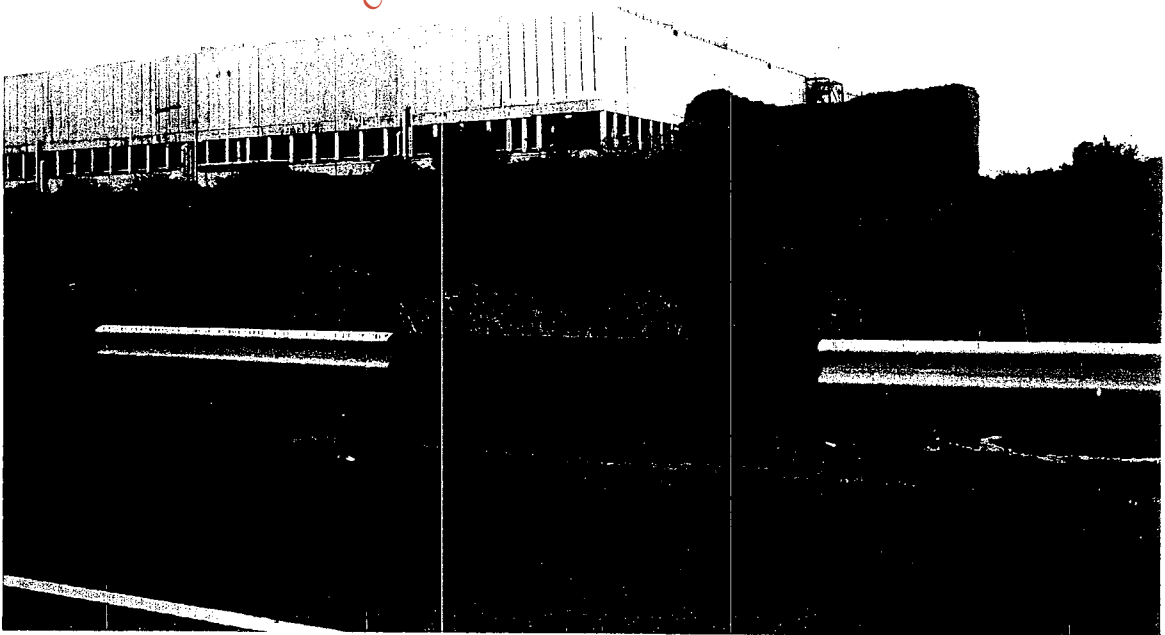


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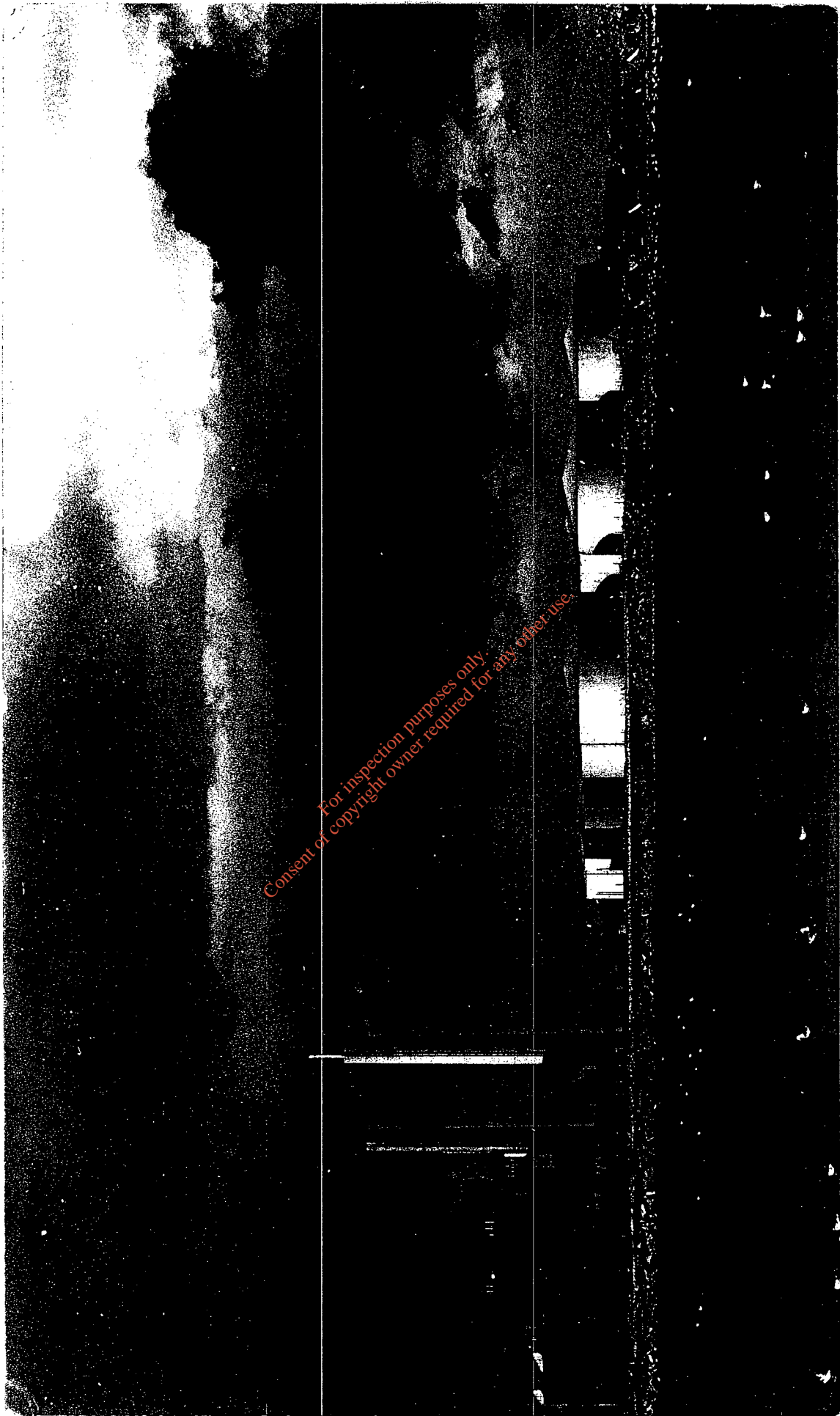
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Appendix D

All photos relate to smoke emissions and air quality.

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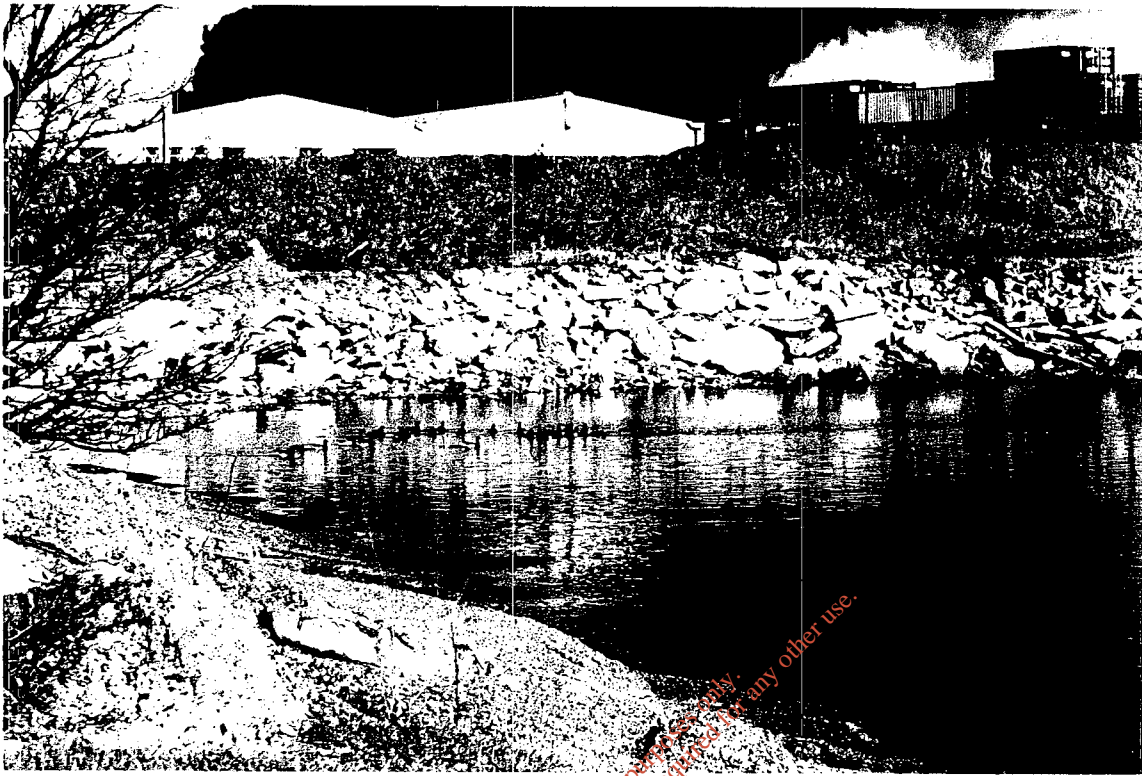
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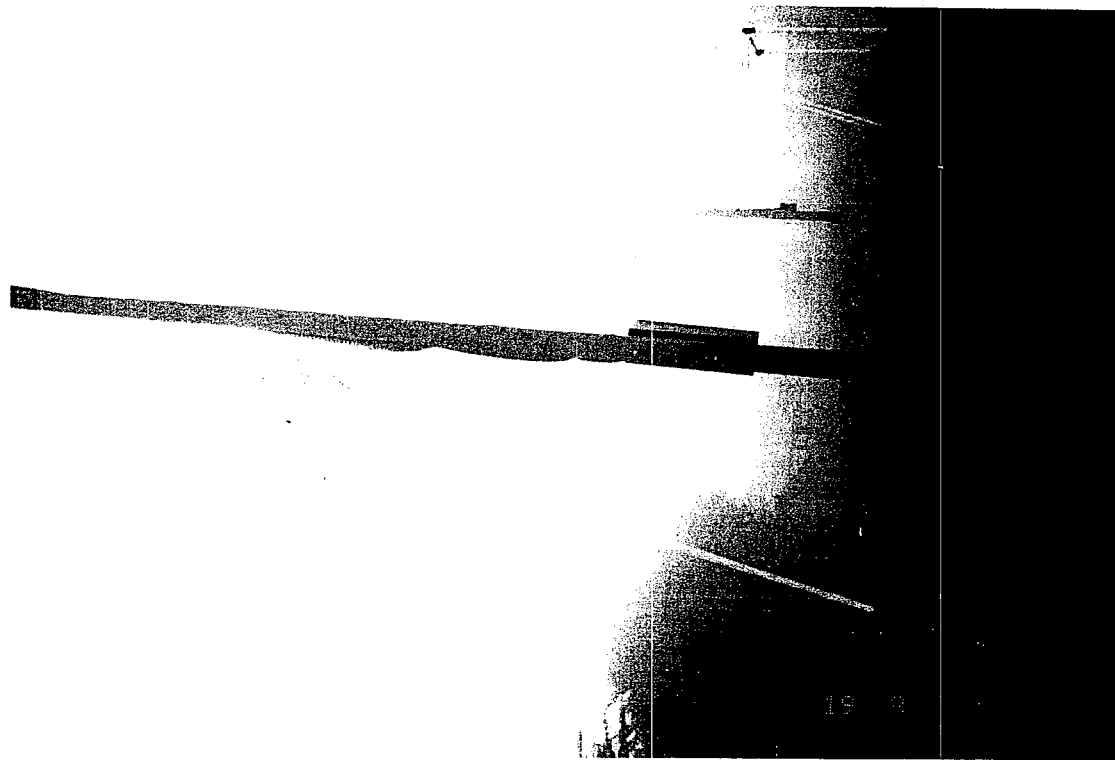
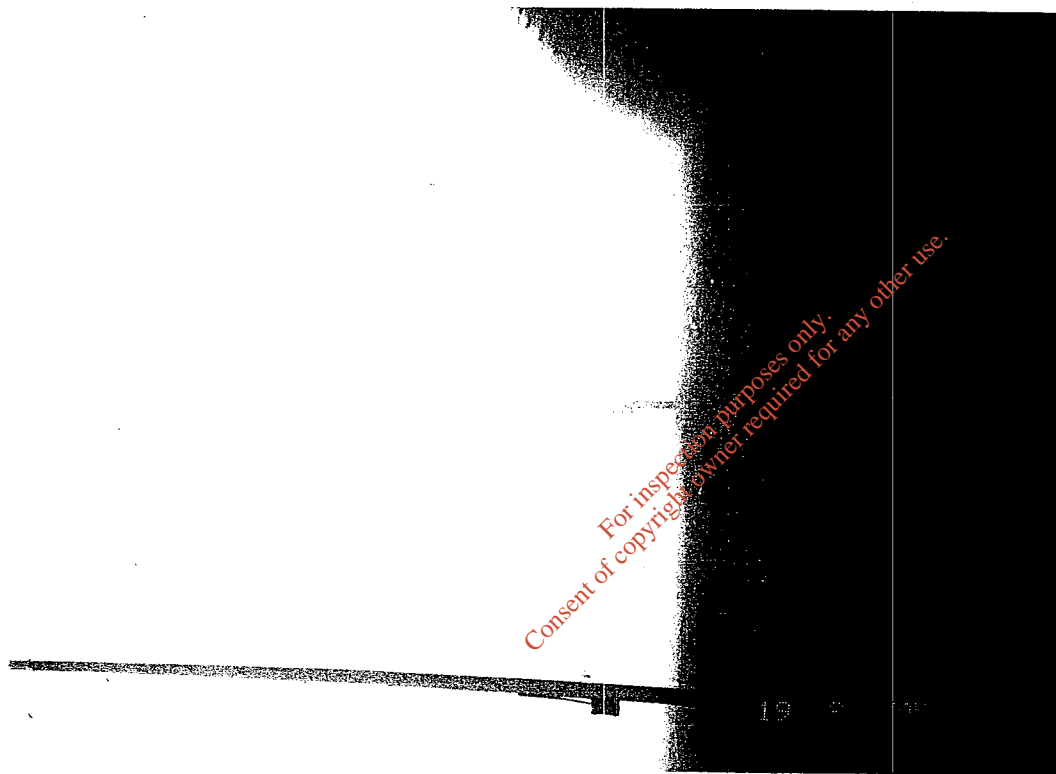


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Appendix E

Photo 1 - Construction site area before pipelaying commenced for Ringsend sewage pipe.

Photo 2 - Construction site nearing end of pipelaying

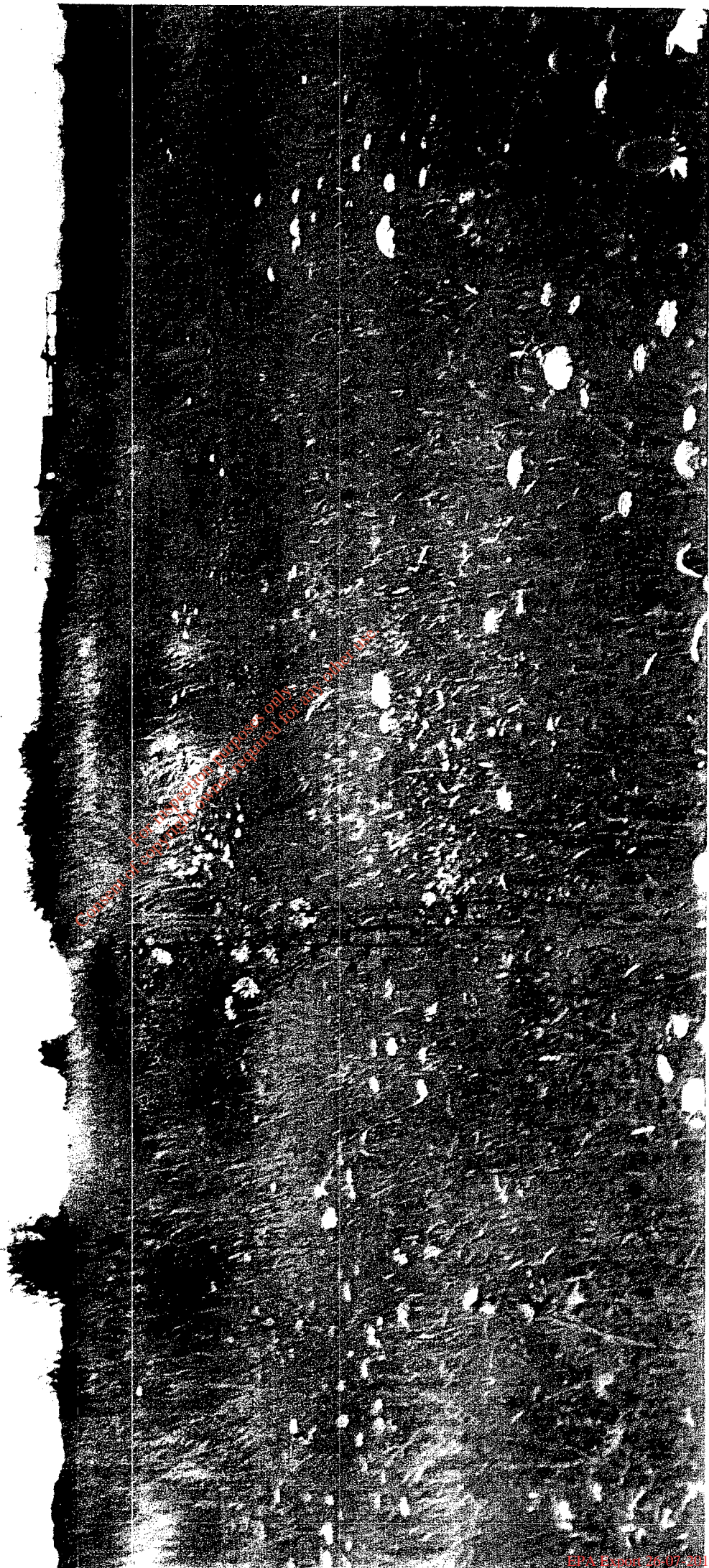
Photos 3 & 4 - Same area recovering after cessation of construction works

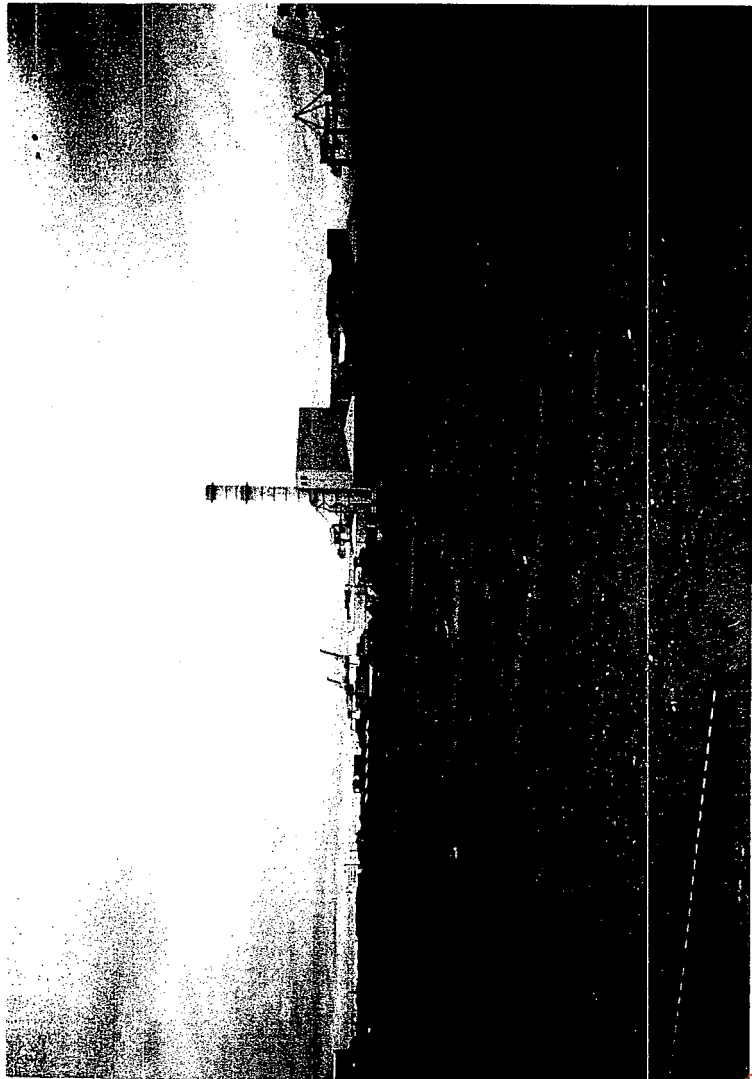
Photo 5 - Birds from the Sandymount Strand SPA using the area again.

Photos 6 to 8 - Fungi in Irishtown Nature Park.

Photo 9 - Path to and beside the same area after work had ceased.

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2005

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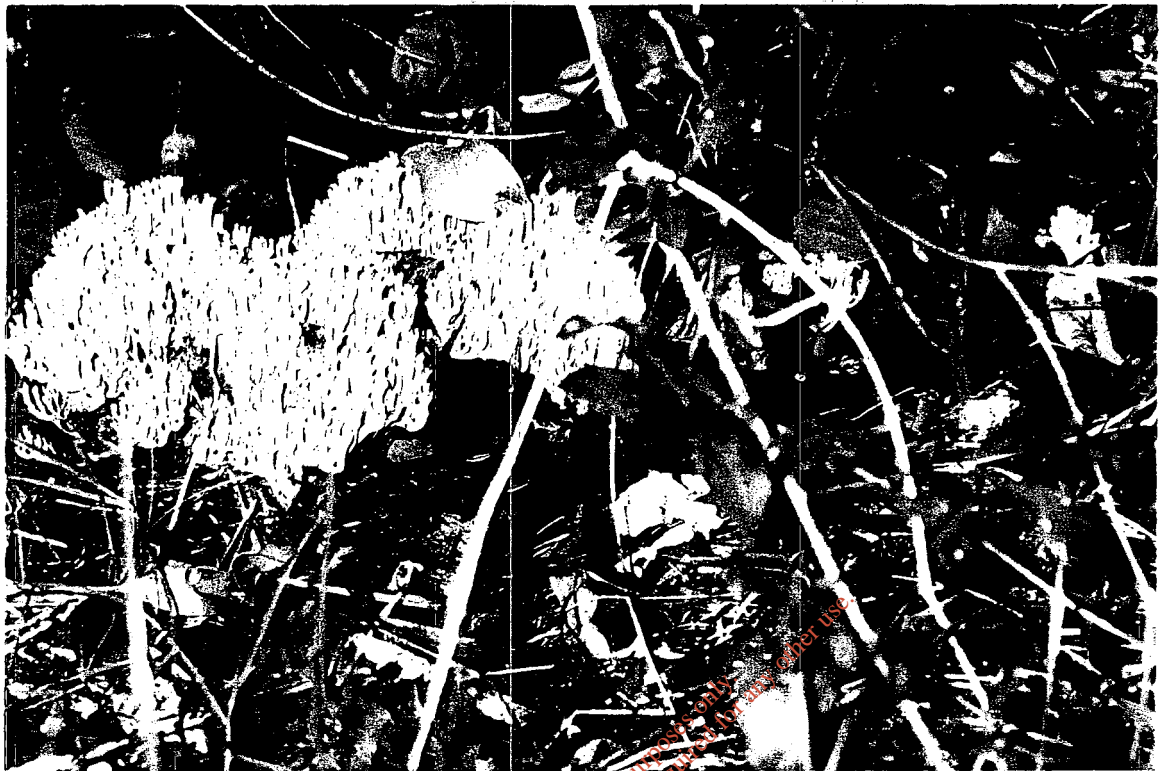


2002

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← *Limonium
biverrucum*

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*Cerithium
Martianum*

Marine/seashore plants at Merrin strand & Merrin Gardens.