

**ONEILL, Pat**

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**From:** Jimmy King [jimmy.king@cfb.ie]  
**Sent:** 14 December 2009 12:36  
**To:** ONEILL, Pat  
**Cc:** terry.mcmahon@marine.ie; margot.cronin@marine.ie; francis.obeirn@marine.ie;  
brian.beckett@erfb.ie  
**Subject:** MLVC - Dublin Port 6-yr maintenance dredging

Pat,

Comment on attached as requested.

Jimmy King

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## MARINE LICENCE VETTING COMMITTEE:

Re: DAFF file ref E3/2/14 Vol. 13 Dublin Port Company – Application for a dumping at sea permit

*Request for observations from Mr. Patrick O' Neill (DAFF) 15.10.2009*

This application follows from recent applications for dredging and disposal of contaminated material from the fairways etc in Dublin Port area. The background, methodologies etc in relation to capping are well presented.

The present application proposes a 6-year programme, to handle contaminated and uncontaminated dredge material

It is proposed to undertake dredging works in stages, on an 18-month basis

I would appreciate answers/clarification on the following issues, please:

- There is an issue of clarity in regard to quantities of material to be removed. This is relevant insofar as this may impact on the amount of material requiring 'capping'. The initial error has been corrected in revised application, circulated with cover letter from Mr. O' Neill (DAFF) dated 15.10.2009. This latter refers to a quantity of 4,000,000 tonnes – five times greater than the initial application. However, in the detailed documentation the tonnage for disposal appears to be 1.1 million tonnes (Section 2.7 pages 7-8). Is one to gather that, with four cycles of maintenance dredging that 1.1 million tonnes will be removed and dredged each time? I would appreciate clarity on this.
- If four maintenance operations are proposed within the 6-year period requested for licensing, will there be four separate capping operations or level-bottom-capping (LBC)? If so, will each be in a slightly different area of the Burford Bank dumping area or will each one successively deposit on top of the previous, creating a layered effect of contaminated – uncontaminated *et seq*?
- Sections 4.1.1.2 and 4.3 refers to "bottom dumping". What does this mean? My understanding is that the dredging will be via suctioning. This would reduce extent of dispersal of contaminated material. In the case of uncontaminated spoil, I understand that disposal will be via openings in the floor of the transport barges, with material falling through the water column to settle. What does "bottom dumping" of the contaminated material (Section 4.1.1.2) mean? What is the process? Does it mean a 'placement process' e.g. via some directional pumping delivery system directly onto to a precise location?
- Section 4.1.1.2 clearly identifies a lag of time between completion of the dredge and dumping of the contaminated material and commencement of the capping process. A hypothetical shift of contaminated material is adjudged to occur over this time lag. It would seem that there can be no certainty that the capping will actually cover the contaminated area. It may cover some of it, it

may cover all of it, it may cover none of it. This is an issue of obvious concern. If it cannot be clarified then one must wonder at the value of the LBC process being implemented here.

- Section 6 deals with alternatives to dumping. There would not appear to have been any consideration given to beach nourishment in regard to the uncontaminated material. Given the approx 60 % sand content and access to beaches at Dollymount and Sandymount I am asking why this option was not considered.

In regard to licence conditions, I would propose the following conditions:

- ❖ Timing of works in each cycle to be agreed with Eastern Regional Fisheries Board, in the context of key windows for life stages of migratory species known to use the Liffey e.g. Atlantic salmon, European eel, river lamprey
- ❖ Dublin Port Company to compile a report on suspended solids levels within the port area. This should cover normal background levels in the Liffey and berthing areas – both in low and flood flow in the river; background levels at times of maintenance dredging, away from digging areas; sampling during dredging process to ascertain range of high values that may occur. The intention would be to compile a profile of suspended levels in a range of ‘natural’ and ‘unnatural’ conditions with a view to understanding what and if role elevated suspended levels may have on the biota of the port area. The Port Company may already have some of this material to hand in previous studies etc.

James J. King  
Central Fisheries Board  
14.12.2009

CC Terry Mc Mahon MLVC; Francis O' Beirn and Margot Cronin MI; Brian Beckett  
ERFB