

**Bea Claydon**

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**From:** Joe McCarthy <joe.mccarthy@me.com>  
**Sent:** 29 January 2013 20:08  
**To:** Wexford Receptionist  
**Subject:** Objection re Dumping at Sea Application S0018-01  
**Attachments:** Objection to S0018-01 Dumping at Sea Permit Application.pdf

Dear Sirs,

Please find attached our objection to the Application by Dublin City Council for a Dumping at Sea Permit.

The EPA registration number for this application is S0018-01.

We would be grateful for an acknowledgement for this objection.

Regards,  
Joe McCarthy  
Valerie Jennings

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52 Claremont Road  
Sandymount  
Dublin 4  
28<sup>th</sup> January 2013

Environmental Protection Agency  
Office of Climate, Licensing and Resource Use  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford

Re: Application by Dublin City Council for Dumping at Sea Permit  
EPA Reg No. S0018-01

Dear Sirs,

We wish to object to the application by Dublin City Council for a permit to dump in Dublin Bay. Our reasons for objecting are:

### **Dublin Bay is shallow**

The bay cannot accommodate the very large quantities of spoil. The presence of the sand banks to the east of the bay and the circulatory nature of the tidal flow will keep the debris in the bay and wash it up on the shores.

### **SAC**

The Minister has designated SAC 03000 from Rockabill to Dalkey. The dump site and the diffuser site are in the area of this designated SAC. No dumping should be permitted in the SAC.

### **Nature of spoil**

The spoil to be disposed of is predominantly limestone and will end up being suspended in the water and will result in a cement like substance when it settles on the sea bed. The spoil would be better off being used to fill in quarries.

### **Split applications – Water – ABP – Dump – 3 EIS documents**

This application is again an example of a split application put in by DCC leaving the public to struggle with not one, not two, but three applications for the one project.

1. The waste water licence D0034-01 was issued in July 2010 with a requirement that it be amended if an LSO was to be used. We have yet to see this application.
2. The planning permission application went to oral hearing in 2012.
3. Now this application is underway with the EPA.

All three applications have very large quantities of EIS documentation. However there is no state agency with a comprehensive overview of the project.

In particular the applicant chose to distract the ABP hearing with the details of land disposal for this tunnel spoil but it is now clear that their intent all along was to dump the spoil at sea. This is an abuse of process and we would maintain that this is in breach of the EU Directives.

We are left in the unfortunate position that the EPA will only deal with a limited part of the application and not the complete project. Quis custodes?

## **Pollution – water quality of Dublin Bay**

The dumping of this spoil into Dublin Bay will cause pollution which will have an adverse effect on the leisure activities in the bay such as sailing, diving, swimming and other water based activities. It will also have an effect on tourism as the Bay attracts large numbers of overseas visitors to the Bay to see the birdlife.

## **Health**

The degrading of the treatment of sewage from tertiary to secondary and the pumping of the secondary effluent out into the bay will affect not only human health but also the health of our marine creatures.

## **Cost**

The cost of building this tunnel is very expensive. The existing plant should be expanded with tertiary treatment onto the adjacent site. This site is likely to be available shortly when the incinerator project finally collapses.

## **Tunnel Boring Machine**

This application is premature as the type of TBM has not yet been decided and therefore DCC has no knowledge of the type of spoil to be dumped in the Bay. This application should be delayed until the selected contractor has decided which type of TBM to use and when they have a proper understanding of the spoil to be disposed of.

## **Noise in the marine environment**

The drilling, boring and blasting will have an adverse effect on the marine life in the Bay and the measures to be put in place to deal with the situation are not adequate. The restrictions imposed by the new SAC must be applied to this application.

## **Second WWTW site needed to the north of Greater Dublin Area**

This plant presents a single point of failure for the GDA sewage system.

Rather than have all the sewage of the Greater Dublin Area piped to a single plant in Ringsend a better solution would be to build a second sewage treatment works to the north of the Greater Dublin Area which could share the load with the Ringsend plant.

## **Alternative uses**

The applicant has not assessed the alternative use for limestone in producing cement.

The material is inert and should be stored above ground as an asset for later use when conditions improve in the Irish economy. The material could then retain substantial economic value.

Yours Sincerely,

/s/ Joe McCarthy

/s/ Valerie Jennings

Joe McCarthy

Valerie Jennings