Department of
Agriculture,
Food and the Marine

Bea Claydon,
Programme Officer,
Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
Headquarters, PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Your Ref: S0021-01.
Our Ref: FW/8/41.

Re: Dumping at Sea Permit application from Port of Cork Company in relation to Ringaskiddy Port.

Dear Bea,

I refer to your letter of 22nd October 2014 and outlined below are observations from our various scientific and technical advisors.

Port of Cork Company applied to the EPA for a Dumping at Sea Permit in relation to Ringaskiddy Port. As part of the proposed development of port facilities and new berths at Ringaskiddy, it is intended that 457,500 t (305,000M^3) will be dredged and dumped at sea at the Power Head dumpsite. Approximately 215,000M^3 will be taken from Ringaskiddy West, 90,000M^3 from Ringaskiddy East.

Dredging methods are most likely to be trailing suction and backhoe.

The output from the sediment transport model indicates that increased turbidity due to dredging will not impact on any sensitive areas.

Sediment Chemistry:

Quantities of material to be dredged and dumped are: Ringaskiddy West – 215,000 M^3.

Ringaskiddy East – 90,000 M^3.

Granulometry of the material has been categorised as: Ringaskiddy West – 100% fine sand/silt/mud.

Ringaskiddy East – 65% fine sand/silt. 35% course sand.

Sediment Quality:

The results of fairly extensive testing indicate that the material to be dredged is essentially clean, i.e. concentrations of measured parameters are predominantly below the lower action level and therefore, it is considered that biological effects are unlikely to occur. The one exception to this is for nickel. Results for nickel concentrations are in the low class 2[1]. This is not unusual in many areas of the Irish coast, and is presumed to be due to natural geological variation. Concentrations of nickel in this range would not cause concern, in the absence of other contamination.

Disposal:

Dumpsite:

The dumpsite proposed for use is located approximately 4 nm south of Power Head. It is an established dumpsite which has been in use since 1978.

The results of sediment chemistry testing of the material to be dredged and dumped at sea as part of this development indicates that the material is essentially clean.

Impact at dumpsite:

There appears to be little lasting impact at the dump site. Side scan and multi-beam surveys between 1999 and 2013 indicate that no significant accumulation of material has occurred, despite the disposal of quantities of sediment totalling in excess of 7 million m^3.

Effects of dumping this material are expected to be limited to physical impact, and biological effects as a result of contamination within the sediment are not expected to occur.

Given the fact that the material to be dredged can generally be considered to be clean sediment and that dumping at sea of the material at this site, has been ongoing for many years in this area, the Department is of the view that the activity is not likely to have a significant impact on aquaculture or sea fisheries in the area and therefore has no objections to a dumping at sea licence being granted.

The EIS states that sediment was tested for eco-toxicity (30 minute EC50). This is, in fact, not the case. The consultants have confirmed that sediments were not tested for toxicity and that this was an "erratum" in the report.

The modelled differences in current speed resulting from the development, as indicated in Figure 12.21 in the EIS, may need to be further investigated. The resultant changes, which look to be greatest between Ringaskiddy and Rocky Island, may cause increased sediment load and may lead to additional scouring, e.g. at the bridge support. (The text of the EIS (section 12.2.3) indicates that the modelled current velocity differences resulting from the development, takes no account of directionality and therefore the differences may be positive or negative).

Side scan and multi-beam surveys at the dumpsite over the years indicate that no great accumulation of material has occurred, despite the disposal of quantities of sediment totalling in

excess of 7,000,000 m3. Should monitoring be better targeted to determine the fate of these sediments?

Fisheries:

There are no licenced aquaculture sites within 15 Km of the proposed dumpsite.

Comments from the Sea Fisheries Protection Authority are awaited and will be forwarded when received in this office.

If you have any further queries, please do not hesitate to contact me.

Yours sincerely,

Geraldine Hurley,
Staff Officer,
Foreshore Management Division.

17th December 2014.