Patrick Doyle

From: Licensing Staff
Subject: Submission No 258 Daniel Hayden

-----Original Message-----
From:
Sent: 26 August 2015 16:54
To: Licensing Staff
Subject: Submission Re: DAS application by Dublin Port Company

Licencing | Environmental Protection Agency licensing@epa.ie

I write to you to express my concern and opposition at the recent proposal of Dublin Port to undertake a dredging project that will see 9.7 million tonnes of dredge waste into Dublin Bay.

- Sediments in port areas become contaminated from port activities, the surrounding urban development, and sources upstream and upwind. Over time these contaminants build up to concentrations that degrade the marine environment around the port and make the sediments unsuitable for dumping in other marine environments.

- Determining whether dredged sediments are legally too contaminated to dump is a controversial process. The Army Corps of Engineers considers 5-10% of all dredged materials to be contaminated; however, they only analyse sediments if they think they have reason to believe the sediments might be contaminated. For the permitting process one set of procedures involving chemical analyses and biological lab tests is used. However, different methods of assessment using field data and lab tests as conducted by the EPA and NOAA suggest that a much higher percentage of sediments in port areas are likely to be contaminated.

- If it is demonstrated that contamination of the sediments is too great to legally permit open water dumping, viable alternatives should be found. Nevertheless, a great deal of contaminated sediment is being dumped at designated sites in open waters. Sometimes cleaner sediments are dumped on top but the effectiveness of this mitigation (called capping) is limited. Some ports have opted to construct confined marine disposal sites -- shallow water disposal areas that are more or less walled off from the surrounding marine environment. Other proposed methods include the decontamination of sediments by biological or chemical treatment and destruction by incineration in specially constructed and regulated incinerators on shore. The effectiveness of each of these methods varies considerably, depending on the contaminants and where the sediments lie.

- Port-associated activities cause some of the contamination: highly toxic antifoulants on ship hulls leach into the water; port industries and shipyards use toxic materials that wash into the water; contaminated bilge and ballast waters are flushed from ships and boats; and cargo handling accidents and spills are consistently sources of sediment contamination.

Please do not allow the recreational lives of the people relying on Dublin bay to plunder and become a distant memory from days gone by.

Yours sincerely,

Daniel Hayden
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Dublin
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