

Eve O'Sullivan

Subject: Submission on Reg No S0034-01 Dumping at Sea Permit Application from PSE Kinsale Energy Limited, and Reg No S0035-01 Dumping at Sea Permit Application from PSE Seven Heads Limited

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From: trillionsofcats

Sent: Monday 31 January 2022 02:08

To: Licensing Staff <licensing@epa.ie>

Subject: Submission on Reg No S0034-01 Dumping at Sea Permit Application from PSE Kinsale Energy Limited, and Reg No S0035-01 Dumping at Sea Permit Application from PSE Seven Heads Limited

Good Morning,

I wish to make a submission on both S0034-01 and S0035-01. From the very outset I'm not sure why these are 2 completely separate applications given that it is all part of the same pipe network, in the same area. From an environmental point of view they would certainly have to be viewed together to be able to understand the accumulative effects of the different decommissioning strategies.

In both applications it is made clear that the larger steel pipes are to be filled with inhibited seawater. The applications state that the volume used (for both applications together) will be 21,500 cubic meters, or 21 and a half million liters of inhibited seawater. This inhibited seawater contains a combination of corrosion inhibitor, oxygen scavenger and microbicide and possibly a dye for leakage detection. It is clear from the applications that it is envisaged that eventually the inhibited seawater would end up in the marine environment. It seems to me that before the EPA or anyone else could make a decision on how damaging this inhibited seawater was for the marine environment, that the exact chemicals to be used and their concentration should be known... Has this information been requested from the applicants?

It has recently been brought to my attention that the applicants are possibly no longer going to use inhibited seawater. Can the EPA confirm this please?

For both applications the pipe network can be categorised into two types, concrete epoxy coated steel pipe and the smaller umbilical/flowline plastic pipe (Polymer - PP and PVC). With regard to the plastic pipe the guidelines in other jurisdictions is if the pipe is below 60 centimeters under the seabed to leave it in situ and if it's closer to the surface to remove it. It is unclear from the applications how deep the plastic pipe is buried. The applications state that some concrete mattresses (which are tied together with polypropylene ropes) will be removed. How much plastic pipe will be exposed by this? How much of the plastic pipe is buried deeper than 60 centimeters below the seabed?

Many Regards,
Dolf D'hondt