OH Doc No: 17

Rec'd From: Captain William Howarth.

Date Rec'd: 10/3/08. 8.50a.m.

Captain William Howarth
"Merville II"
Garristown
Co. Dublin

October 8th 2007

Re: Proposed Landfill at TOOMAN NEVITT (EPA W0231-01)
8 N.M./15km NNE of Dublin Airport.

To: Environmental Protection Agency

Cc: Irish Aviation Authority, Irish Airline Pilots Association,
Air Accident Investigation Unit

Dear Sir or Madam:

The purpose of this note is to prevent an accident happening to an aircraft in the vicinity of Dublin airport.

My credentials are 61 years flying experience in aeroplanes, including 30 years with Aer Lingus on turbo props and turbo jets. 10 of my Aer Lingus years were as Training Captain and Chief Instructor BAC 1-11.
I am still flying on a Private Pilots Licence.

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It is well known that most flying accidents are the result of a chain of events.
In my opinion the proposed Nevitt dump could provide one of the links in such a chain.

The attached diagram was made from a print out produced during an exercise in a modern airline simulator, with an experienced Training Captain conducting the evaluation.

The criteria for the positioning of a dump are 13km from an airport and **8km** from the **APPROACH PATH**.
The simulator print out shows the approach path of an aeroplane flying with one of its two engines shut down. The **APPROACH PATH** passes **2km** from the **centre** of the dump.

The performance of a modern twin engined turbojet on one engine is, of necessity, good. However, that performance is based on the assumption that the failed engine is properly shut down and secured.

In the 1980's an Aer Lingus Boeing 737 suffered a bird strike in one engine on take off from Dublin Airport.
The resulting vibration caused the engine to partially detach itself from the airframe. It was hanging down from the wing resulting in a significant increase in drag. This reduced the rate of climb to such an extent that the Captain, in his own words to me, was "*looking for a place to put it down*".

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Even without the drastic reduction in performance described above, the time spent in dealing with engine failure and on cleaning up the aircraft prior to entering the climb segment, would cause the aircraft to be at a suitable height for bird strikes on passing near the dump.

Notes:

1. Dumps are not marked on aerodrome charts. Crew would not be aware of a dump when deciding on a return flight path.

2. Why use R/W 34 for take off?

    a) Wind Velocity.
    b) Other R/W out of service.
    c) Associated operational advantage in consideration of subsequent route. (Northerly departures - Going to Glasgow etc)

Conclusion:

Planners and contractors seize on the "criteria" to reinforce their proposals.
In my opinion the criteria are out dated and do not cater for emergency situations. Although the scenario I have described is based on a departure from R/W 34 at Dublin Airport, the use of other runways could also lead to tragedy. The simple fact is that the proposed dumpsite is demonstrably too close to Dublin Airport. It is within the manoeuvring area of the airport, inside the laid down criteria for both RWY 16 (Landing) / RWY 34 (Takeoff) and common sense dictates that it is a potential hazard.

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To site a bird attracting dump within a control zone is **not compatible with air safety**.

It would be greatly appreciated if the recipients of this note would be good enough to acknowledge as having read it.

Yours faithfully,

Captain William Howarth

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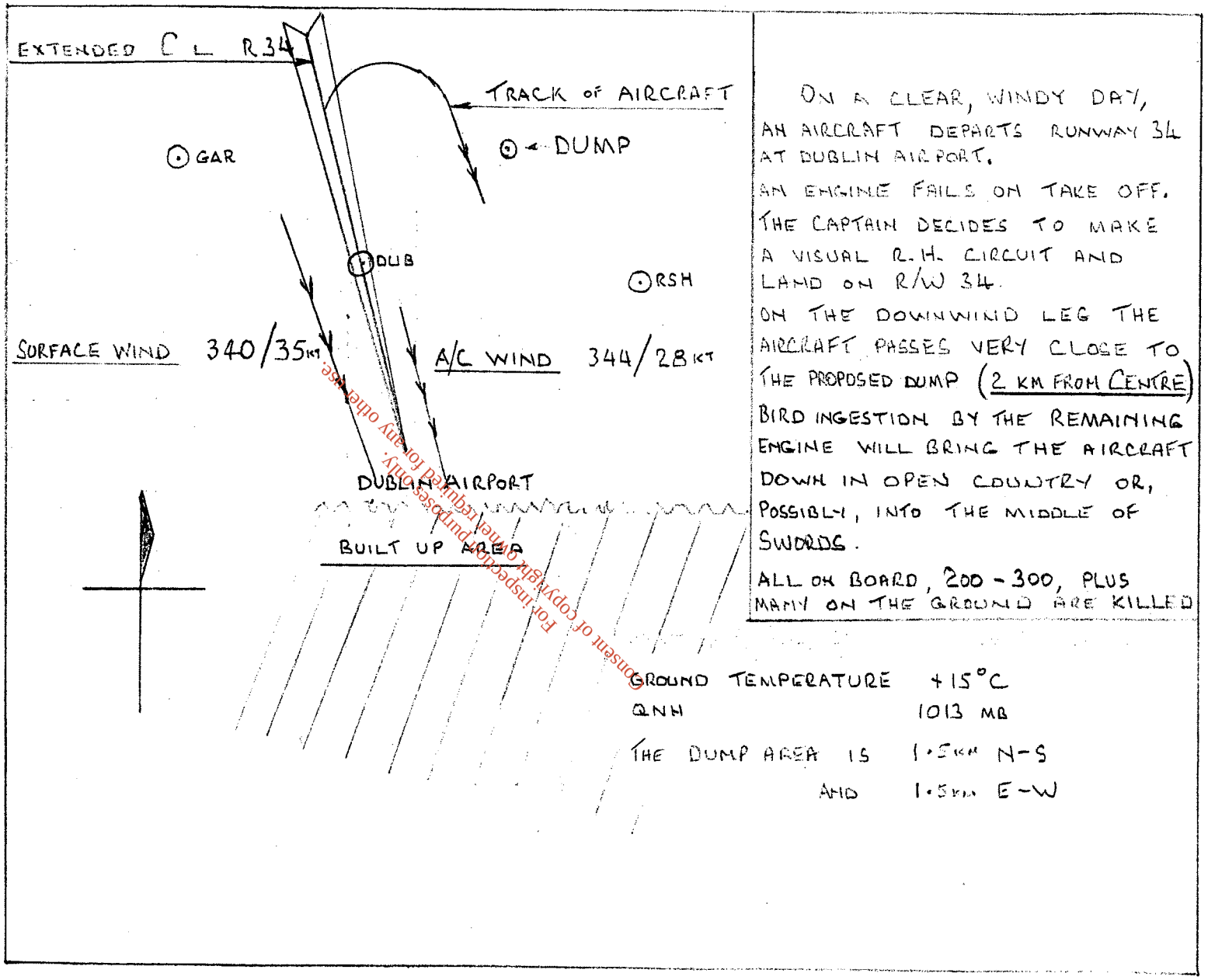

ON A CLEAR, WINDY DAY, AN AIRCRAFT DEPARTS RUNWAY 34 AT DUBLIN AIRPORT.

AN ENGINE FAILS ON TAKE OFF. THE CAPTAIN DECIDES TO MAKE A VISUAL R.H. CIRCUIT AND LAND ON R/W 34.

ON THE DOWNWIND LEG THE AIRCRAFT PASSES VERY CLOSE TO THE PROPOSED DUMP (2 KM FROM CENTRE)

BIRD INGESTION BY THE REMAINING ENGINE WILL BRING THE AIRCRAFT DOWN IN OPEN COUNTRY OR, POSSIBLY, INTO THE MIDDLE OF SWORDS.

ALL ON BOARD, 200 - 300, PLUS MANY ON THE GROUND ARE KILLED

SCALE 1:252545

0 5 NM 10 NM

0 5KM 10KM 15KM 20KM

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