

APPENDIX 2.4

Issues Raised

Need for the Project

Questions were raised about whether the whole project was a *fait accompli* that an incinerator was going to be built.

Concern was raised that there were no alternatives provided to manage waste and that incineration was being prescribed

A concern was raised that the waste figures are changing

Why should we be put under this serious health danger for only 25% of the waste in Dublin or is 25 meant to be 75%?

Where does all this rubbish come from?

So we won't be taking waste from outside of here? What happens when Dublin's waste grows?

If we manage to reduce our waste where does the plant get the rest of the waste to feed it?

You are talking about bringing waste in outside of the peak hours, this will mean that we never get a break from the traffic.

How many incinerators are planned for the whole country?

Why not have a few smaller incinerators?

Site Selection

Why was Ringsend picked as the preferred site

Was Ringsend chosen as a site because its near to the sea and waste could be imported.

Where is the incinerator going to be?

Is it possible that information might come up in the EIS that could change the siting of the incinerator?

Is it public knowledge which site came in second?

I think the proposed site is the worst place to put it. We have two metal places and other sites down there, it is like a cess pool and its not going to get any better with the treatment plant. The park was destroyed years ago.

If the site was chosen on the basis that it is central, and the baling stations are going to be use, it is not central any longer.

Is the site definitely Poolbeg?

Was Poolbeg chosen because it is near the power station?

Given that the location of the landfill is quite close to the northern edge of the M50, would it not make more sense to build the incinerator there also?

Does the contract specify that the tenderer is being engaged to build on the Poolbeg Peninsula?

Can you site an incinerator on a landfill site?

Will the other possible sites considered be included in the planning application?

Landscape and Visual Impact

It was pointed out that Dublin Bay is a Special Area of Conservation but the Poolbeg Peninsula is not a protected area but is zoned for industrial use.

Traffic

Concerns were raised about the small roads, crumbling bridges, and traffic and health problems

Issue of lorries driving to the old Hammond Lane site at 11 pm at night

A concern about the baseline case that is being taken for traffic, is it pre or post Port Tunnel?

Traffic on Strand Road should be monitored

With the traffic problems on Pigeon House Road, would you raise children there?

When will you know what the designated routes that the trucks will take will be?

Is it 200 trucks over 5 or 7 days a week?

My main objection is the traffic – its horrendous, particularly with heavy trucks, which are a problem for pedestrians and cyclists. Now you want to bring more trucks on to our roads. How can we have confidence when you are consulting with us on Grand National Day and Semi Cup Final Day?

The Port Tunnel will be here too, we will have all of the pollution and there will be even more traffic following these developments. We don't want any more industry down on the peninsula.

The developments at Merrion Gats, AIB and the RDS will bring thousands more vehicles.

What happens in Dun Laoghaire? I have visions of these trucks on these roads that can't take any more traffic.

How can we trust these figures (traffic figures)?

The plant was designed for the peninsula based on the Eastern Bypass being built but this has not yet been done.

When the Toll Bridge was built in this area, the assessment on traffic was very limited. There are now 25,000 vehicles, assessment doesn't always work out how you plan it to. There is enough traffic on our road system.

What time will the trucks be running?

The traffic flow charts show the a.m. and p.m. periods. Did you do a study on the interim hours?

When the car ferry comes in all of the trucks filter through Beech Road, they don't bother with the Toll Bridge as it takes them out of the way. If I was a driver that would be what I would do. These drivers that will come on these lorries will take the shorter route.

The M50 and the Port Tunnel are fine but will still bring big trucks into D4. There was a 3 tonne limit on our roads 5 years ago and it was a joke as no one respects the limits.

What proportion of truck journeys will come over the Ringsend Bridge?

The drivers decide which way they want to go. There is no restriction on the Ringsend Bridge for the safety of cyclists and pedestrians.

Are possible routes being looked at – what about Macken St.?

Can there be a condition that a local (traffic) model be built?

What about the docks and trucks coming down into Irishtown? A bridge has the potential to eliminate traffic.

I think you have dismissed rail and there is a rail head on North Docks.

We are all very concerned about the transport as it is the worst site for transport.

Is it in the contract that the tenderer is responsible for sorting out the traffic problem?

How will waste be brought to the plant?

Complex equation between trucks that produce particles and stack particulate matter.

Entire traffic study was conducted in 2003. It needs to be updated.

Air Quality and Climate

What is the vapour that comes out of the stack?

Are the traces of pollutants coming out in the vapour completely non-hazardous?

There is more damage from bonfires and cigarettes!

The emissions have to fall out somewhere.

If there were a temperature inversion 130 metres up in the air, how would this affect the emissions?

Modelling in EIS should take account of the following:

- Secondary organic aerosols created in the stack by condensation.
- Compounds produced after flue gas cleaning i.e. aerosol etc. are prone to precipitation and then falls to ground.
- Current levels of particulate in Dublin need to be studied to a level beyond what AWN have produced.
- Topics in Indaver EIS don't address the above.

Aerosol modelling should take aerosol formation and secondary particulates into account. Subject to very complex aerodynamics that needs to be taken into account.

Residues and use of Materials

Concerns were raised about the heavy metals that are contained in the bottom ash and how this could be spilt and enter the Bay

Is there a way of treating fly ash chemically?

What happens to fly ash after it has been put in storage?

Has a decision been made yet as to what will happen to fly ash from the Dublin plant?

Is it probable that the fly ash will be shipped out?

Where will end products go?

Does the fly ash not have to be stored in a mine as its harmful?

Will the fly ash be exported?

So 7,000 t of hazardous waste will be exported?

Is there any definite plan for how bottom ash will be used?

Is the remaining produce coarse or fine?

Will the fly ash and bottom ash be taken back to the transfer stations?

I'm concerned with how you will handle the fly ash, is it dangerous?

Is it the intention to transport the ash out by the south side as there is a jetty there?

Where is the 25% of the weight remaining at the end of the incineration process from and where will it go?

Anything that could extend the life of gravel would be a good thing as there is a problem with the supply of gravel in Ireland.

Is there any pre-sorting of material before it goes into the waste hopper?
Not all people separate their waste.

Will the plant burn hospital waste?

If everything goes according to plan and honest competent people are running the plant, I would be happy with the knowledge that dioxins are not being emitted and that the plant causes no harm to health. However, if the plant is not well managed that would be different.

Was there a problem with fly ash in England?

Where will the ash be cured? Where will it be cooled?

What happens if it is hazardous?

Water

Comment about the range in the values for water quality and how more sample sites might show a greater range

Human Health

Concerns was also raised about the health effects on the population

What about the cumulative effect of pollutants on the area?

I am worried that it will affect my health

There are a lot of respiratory problems in the area, I'm afraid that a bit of extra emissions could push people over the edge

What are the EU standards based on, is it scientific studies that say dioxins are safe to human health?

I'm concerned at the cumulative effect of particulate matter from traffic and from incinerators, in particular heavy metals.

If the incidence of diseases is higher in an industrialised area, then should incineration be added to the melting pot?

Do you know the effects of dioxins from traffic?

Given the substantial increase in traffic, there will be effects, what will be the impacts from that increased load?

There is only one road going down to the proposed site – how will that take traffic?

What effect does dioxin have on human and animal fertility?

In post mortems, is account taken of dioxins present in the corpse of someone who has just died?

What about the fumes coming from the lorries?

Do the emissions include furans?

Do Gunnar or Dieter have any concerns about any other emissions?

What about preventative health – screening for asthma at national schools?

Who is responsible for the health effects of a given plant - designer or regulator?

Who is the guardian of our health? Do the HAS have a role?

Indavar EIS – doesn't study PM 2.5 day by day by rather on an annual basis.

Estuarine Ecology

Are the flow of water and the tidal patterns in Dublin Bay changing?

What are the risks to marine ecology from the construction and operation of the plant?

Terrestrial Ecology

What impact will the plant have on the ecology of the area?

General

What consideration has been taken of the microclimate and energy efficiency of the plant?

A concern was raised that there was no land to build on anymore – there is a requirement for apartments in the area so maybe this site is no longer suitable?

What about the proposed fast tracking of the planning procedures with a Critical Infrastructure Board to bypass the statutory process – will the proposed plant be included?

Is the integrity of ecology data sound, as it has been provided by Dublin City Council and they have a vested interest?

How is risk minimisation determined?

Is there any historical data that can be used for comparison?

Would be interested to hear about plants in other countries, particularly the data before and after construction

Concern over the difficulty in getting accurate baseline information due to fires on the nature park.

In terms of environmental law, what must happen before it takes effect e.g. how many birds would need to be affected to be considered of ecological significance?

It was suggested that the meetings were too restricted and that there is a wider community outside the immediate locality who should be informed

The data should be put into terms that are more meaningful, that is easier to understand.

I am concerned when you say that you cannot do proper biological tests in a mixed area.

If you have an incident and it is never recorded we would never know.

I have doubts about some of the estimates of sources of pollution – I'm not sure how these figures were arrived at.

Someone said that the incinerator will last 30 years, will the EPA monitor it for all of this time?

Is the plant monitored directly by the EPA?

We used to be told 4 days before the EPA were coming to the plant I worked in.

Are you looking at the waste to energy plant on its own without the aspirations of other developers in the area?

What is the prospect of taking some of the old landfill waste and using it to maintain the operating capacity of the incinerator?

If some of the waste from the landfills could be used in the incinerator, it would provide a clean space in which to deposit some of the incineration residues.

From the time that the contract is signed, how long will it take until the plant is operational?

Would the effluent water from the plant interfere with the biological processes of the sewage works?

What are the actual risks?

What is the area that the vapour falls down on from the stack?

We would be better off burning paper rather than collecting it – I don't like recycling!

You are guaranteeing reliability so can we assume the bidders are not Irish.

Given your scientific understanding, are sampling techniques of 2-6 times per year sufficiently safe for modern plants?

Do we have baseline data for the peninsula?

We can't object to putting in an incinerator as we don't have the necessary information?

Is there a baseline measurement of dioxin in this area?

How many measurements are being made and does it include meteorological conditions at the time?

What congeners are you measuring for?

Are you aware of figures that show problems with pre- and postnatal effects of people living near incinerators?

Is putting waste into the sea and extending the coastline not acceptable?

Have you any plans in this area (Ringsend) for landfill?

Have you or are you consulting with NGOs on this matter?

Can the public have access to the specification that was used for the contract?

Can you tell us the basis of the contract, who will be the ultimate owner of the plant?

If the tenderer will design, build and operate the plant, what role is there for Dublin City Council?

Have Dublin City Council been given guarantees from the parent company of Elsam Ireland?

Do the public get a chance to discuss what goes into the final document before it goes to An Bord Pleanála?

Is the local authority obliged to collect everyone's rubbish or can they turn around and refuse to do it?

What is scoping?

What topics will be covered by the EIS?

Is there a link with another ongoing survey about the proposed causeway along Sandymount strand?

When rubbish is burned, where does the smoke go?

Who will monitor emissions from the plant?

Could waste from all over Dublin come through our area?

How much waste do we export?

The plant and traffic routes should be mapped and interviews should be carried out in this area as they are the most affected.

The number of people in the catchment area is known but their opinion isn't and you haven't informed them so they can't respond with informed opinions.

Interactions not well addressed in previous EIS. The following should be recognised and addressed

- Synergistic / logarithmic effects
- Scale impact of combined organic chemicals.

Who make the policy guidance re WHO papers for example?

What is the allowed capitol return for the operator – this return affects the cost of the gate fee which in turn is paid by the community (residents, business exchequer).

Who are Elsam Waste to Energy Ireland Ltd - Single member company.

Who formally is responsible? Corporate ownership of the incinerator is of the essence regarding their bona fide for doing it right and their responsibility to do it right.

The SLA should require monitoring by someone other than the operator.

Will there be Geiger counters on the input of the plant?

Incineration is unsafe at any level.

Community Gain

What benefits will the community will get out of the development of the plant.

Who defines what the 'community' is?

What is community gain?

I was not aware of money being available for the community – why compensate the community, the incinerator isn't negative, only the transport impacts are.

I really like the idea (community gain), this is new I've never heard of it before.

How much money is available?

What will this buy us and is this fund at the expense of Dublin City Council capital spend?

What are the limitations on the fund?

Will the local community be consulted on how this fund will be set up, run and operated?

Who will adjudicate the decisions on how the money is spent as different parts of the community will want different things?

Who decided on the sample area for the survey?

What area is being surveyed?

Is the purpose of the survey to find out how the community want to spend the money?

The needs and wants of a community will be very diverse and some members of the community are more of a stakeholder than others e.g. those who have lived here for a long time etc.

Dublin Bay is an amenity area for those outside the sample area, they too should be included in the survey.

Statutory Process

How are the information sessions feeding into the planning procedures, particularly the EIA

How does An Bord Pleanala make their decision and how can the community participate?

Who applies for the planning permission?

Operations

What penalties will be imposed on the operator of the plant if it is not operated properly and will these be provided to improve facilities or will it go into a black hole.

What is the capacity of the plant and what type of technology will be used?

What will happen if the plant is not run properly and the ecology is damaged?

The plant could be the best in the world but if it is badly run there will be problems.

If its not the best plant from a health point of view we are in difficulties.

What standards are likely to be used for PM25?

How will we know that the dioxin levels are being measured and that they are not exceeding regulations?

How will we know when the incinerator is not working and who will be accountable?

Are there incidents where incinerators with the new technology don't meet the requirements?

How will we know if it will meet the standards?

Will the plant only take waste from the Dublin area?

Will the plant take hazardous waste?

Is there any reason why water effluents from the waste to energy plant cannot go into the sewage works as opposed to straight into the sea?

Is the waste fed into the incinerator in a 'batch process' or on a 'continuous process'?

What precautions are used to cover the risks involved in the start up and shut down procedure?

Do staff ever have to handle partly combusted materials?

How high will the stack be, will it be smaller than the ones there now?

Where will the process water come from?

How is the negative pressure maintained within the plant?

Waste will have a variable calorific content because the only sorting carried out is by the householder – how will this be dealt with?

Is the flue gas temperature adjusted at the outlet?

What sort of lag time is there in the furnace?

Will predictive control be carried out?

What is the lead in time for starting the burners when the temperature drops below 850 °C?

Class 4 plants produce low quantities of dioxins. What is your experience of plants that meet the Class 4 standard? Would you be familiar with how often they are shut down for exceeding their emission limits?

Are dioxins monitored before or after they are produced?

How wide will the stack be?

Will there be an inner flue where the plasma arises?

How many dioxin monitors will there be in the sampling chain of the flue?

How will the plant be monitored?

How can you guarantee that individual homes in the area will get district heating?

Choice of furnace.

How many lines etc?

Whose furnace will be use?

Operational boiler temperature and how it will effect quality / performance i.e. In the USA boilers are replaced every 18 months.

Who assess the quality of the burn?

How much will be spent on the quality of the furnace

Higher combustion temperature has a huge effect on cost as likely hood of corrosion is higher.

Who decides to produce more energy? (i.e. burn at a higher temperature verses preserving the boiler)

Engineering decisions regarding all of the variation of the grate etc impact on the plant performance.

Three conflicts for a plant designer:

1. Residence time required.
Hot gas eats side of furnace which is made of steel or refractory
2. What temperature and pressure do you need the boiler at?
Do you prioritise boiler maintenance over energy product?
3. De Novo synthesis
Resident time for creation of heat with protecting the furnace.

Later consequence – efficiency of process determines whether plant is for disposal or heat.

Drying of sludge could be a use for heat

DCC will prioritise standards and Elsam will prioritise cost so who decides on:

The bag filter – fibre glass Vs Cotton?

primary or secondary bag filters etc?

Gas scrubbers - wet or dry?

De NoX unit?

Coke onjection?

Coke bed or activated carbon?

Cleaning of the secondary particulates?

Elsam – Do they build plants?

Who will actually build the plant?

Clarification is required on the size of the plant.

What is the guaranteed waste supply to Elsam?

Where / How are conflicts of internal replacement of equipment resolved – all of which are costs.

Statutory Processes Session

Is there a maximum period for consultation?

Does it make any difference as to who makes the application?

The 6 week consultation period is totally inadequate.

Will the technology be known before the application is made?

Which statutory process comes first?

What technology will be applied for and will we see details before the application is made?

Will the EIA be made available before the application is made?

Who decides to make the statutory processes longer?

There is no road for the extra trucks to come to the site on.

Is it right to say that if comments are not made by a person in the first phase of consultation, they will not be able to go through to the second phase.

Can an objector propose his or her own solution to the waste problem?

Is there a fee to make an observation to An Bord Pleanála?

How many weeks is the first and second stage of consultation on the waste licence?

How long do the community have to make submissions?

What information will be made available – do the public get access to the planning application and the EIS?

There have been significant changes from Best Available Technology Not Entailing Excessive Costs (BATNEEC) to Best Available Technology (BAT). Would Guidance Notes that are being produced for this be available to the community?

It would concern me that we don't know what scientific information is used to determine the application.

Do the public authorities have the authority to enter into bonds?

Who staffs the Office of Environmental Enforcement, who will conduct the monitoring of the plant and at what frequency?

Will the processes of planning application and waste licence application run side by side or separately and when will that time be?

If the fast tracking process proceeds through legislation, would this system be used or the existing process?

If the process were to be changed would Dublin City Council inform the community of exactly what the process would be?

When the application is made will Dublin City Council put the information on the website?

The statutory process seems very complicated, would an ordinary person be able to oppose the plant?

How long does the advert appear in the paper?

We need to ensure that people have adequate notice so that there is no need for further questions at a later date.

Does Dublin City Council hold a neutral position with regard to this proposal?

Who decided that the plant should go on the Peninsula?

Will there be a site notice about the application?

An advert in the newspaper about the application is not enough, how do I know what day it will be posted?

At what stage can the non-technical summary be obtained?

There is a lack of information as to where to find information.

The council could be faulted on many things but not on lack of information. There has been dozens for meetings, there is the Ringsend office, leaflet etc.

Where will waste to the plant be coming from?

If An Bord Pleanala has no function to control emissions who carries that function?

What amount of refuse is expected at the plant?

It is good to see that the EPA carries out unannounced inspections of these types of plant.

How were the 13 applicants reduced down to 2?

Will the EPA take the disposal of bottom ash and fly ash into account?

The EPA would have the provision to establish whether they agreed with what was proposed and could alter what was proposed on the basis of the licence. If there were no objections would the EPA automatically issue a licence with no conditions?

Will there be documentations around waste disposal?

Will there be certificates of disposal issued to the local authority coming into the plant?

Can we quantify the amount of waste resulting from incineration?

Is it likely that there will be a market for the bottom ash?

What becomes of medical waste?

