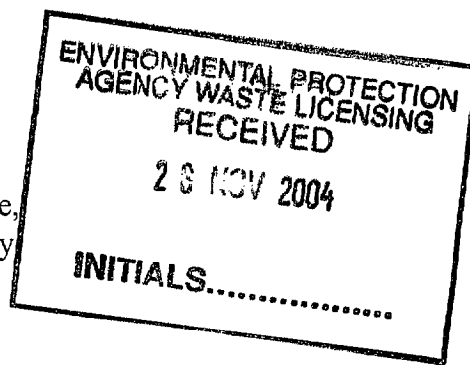


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23 November 2004

Ms. Karen Vaughey,
Programme Officer,
Office of Licensing and Guidance,
Environmental Protection Agency
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford.



**Re: Article 15 Waste Management (Licensing) Regulations 2004.
Shannon Vermicomposting Ltd. Register No. 209-1.**

Dear Ms. Vaughey,

I acknowledge the notification received in relation to the application for a waste licence by Shannon Vermicomposting Ltd. for its operation located at Coolross, Rathcabbin, Co. Tipperary. In accordance with Article 15 of the above Regulations which provides that "*a person may make a written submission to the Agency in relation to (i) an Application and (ii) plans, documents and particulars*" as are submitted by the applicant, I hereby submit my comments in relation to the above application and associated documents from a public health perspective.

At the outset I must state that I have been involved in the investigation of a number of public health complaints from residents in relation to the operation of this site under its current waste permit (WPTN 08) granted by Tipperary (North Riding) Co. Council on the 3rd of August 2002. I have investigated these complaints and I have forwarded my reports to the Environment Section of Tipperary (North Riding) Co. Council for their attention. These complaints consisted of malodour nuisance, risk of contamination to local water supply sources, speculation regarding content of waste matter e.g. bones being retrieved by dogs scavenging on site, foreign workers living in caravans on unserviced ground on waste disposal site, week long burning of rubbish and operations extending to 8 or 9pm in the evening. In relation to the complaint regarding malodours emanating from the site, I have in the past found there to be a distinct smell similar to methane gas (CH₄) in the air.

My concern relating to this site is that the operator of this plant appears not to be abiding by what is allowed under the assigned waste permit (WPTN 08). The maximum allowed tonnage of waste to be disposed of weekly is a maximum of 20 tonnes per week. Yet I have evidence of large tonnage capacity lorries leaving the premises and these can be seen entering the facility frequently during the day which means there is a likelihood of them exceeding their allowed tonnage in a site which is not capable of catering for these levels. Waste is building up quickly around the site which has now been fenced off. I would imagine that should a Waste Management License be granted in favour of the activities as stated on their application under

Third and Fourth Schedules, that monitoring and inspection would have to be most thorough and vigorous.

Mushroom Composting

I would anticipate that the Department of Agriculture and Food will have been contacted in relation to the prospect of mushroom composting and requirements that must be enforced and structural and operational provisions that must be in place to ensure that there is no contamination of the foodstuff by sewage sludge. A risk assessment must be conducted to prevent harmful organisms such as E. coli from getting back into food chain. This is a most serious matter which needs much attention.

Air/Odours

I have experienced at first hand escape of malodours in vicinity and surrounding areas of site from my inspections. Escape of odours and gases appears not to be controlled currently and I cannot see how the survey undertaken by Bord Na Mona Environmental Ltd. showed that the emissions did not contribute to increased odour levels. I also note this was conducted over one day – surely this does not provide an accurate representation of quantity of emissions released. Surely this study should have been undertaken over a period of 5 days at least to get an accurate reading. I do not see anywhere on the licence application as to whether or not there were tests conducted to detect levels of harmful gases such as ammonia and greenhouse gases.

I would also be concerned regarding the alleged burning of rubbish on occasion as this is also forbidden under their current Waste Permit.

Noise

The issue of noise is also an important consideration. Once again this is a difficult area to enforce due to lack of statutory limits. I would consider the likelihood that operations could continue beyond operating hours. There have been complaints that operations continue to 8 and 9 o'clock at night. Operating hours are supposed to finish at 6.00pm.

Dust

It is vitally important that dust levels are kept to a minimum to prevent spread of contamination to surrounding areas. I note that composting facilities are to be moved indoors. However, I cannot see it stated anywhere other than use of damp compost (which will eventually dry up I'm sure) as how they anticipate controlling of dust indoors. Please note also that watering the area is not an acceptable method of remedial action as watering will not make dust disappear – it makes it travel – and I would be concerned about contamination spreading to surrounding area and any foodstuffs present if this was relied on as the main method of dust removal.

Human Beings

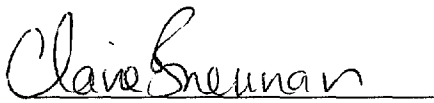
With regard to excerpt taken from Application, I must address this issue insofar as human health is concerned. This is human health not only of people living within the area of the site but of the foreign workers living on the site with no proper services

available to them or proper living accommodation. This matter was brought to my attention by a local resident and Ms. Kathy Sinnott, MEP, who visited the site and was disgusted by what she saw. Although this is not an area where the EPA is directly involved, it should be considered in terms of the operators/applicants of this plant and what they consider suitable living conditions. This report has also been sent to North Tipperary Co. Council for them to address. Without adequate services for these people you have increased risk of contamination to water sources in the area as I would imagine there are no provisions in place to treat human waste matter generated from this area.

General

I would hope that the EPA, as the regulatory body, would consider current operations, even though it is not under their remit as present, as to whether they believe the facility will be run strictly in accordance with requirements. If the facility cannot be run properly and within provisions of waste permit at this time, I do not see how this will be carried out with 20 times more waste going into it. I would therefore hope that an Environmental Impact Assessment would be carried out to assess the potential risk to the Environment proposed by this facility should a licence be granted.

Yours sincerely,



Claire Brennan
Environmental Health Officer

c.c. Dr. Kevin Kelleher, Director of Public Health, Department of Public Health,
Mid-Western Health Board, Health Centre, Dooradoyle, Co. Limerick

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