

obj ⑥ 186-1



ENVIRONMENTAL PROTECTION  
AGENCY  
19 NOV 2004

## MONKSTOWN BAY SAILING CLUB LTD.

3. De Vesci Place, Monkstown, Co. Cork.

---

Ref : Register No 186-1

17<sup>th</sup> October 2004.

Dear Sir/Madam,

Please find enclosed a submission from Monkstown Bay Sailing Club and the Monkstown Amenity Group re the proposed location of the Indavar toxic incinerator.

Both groups are deeply concerned about the health and fire implications of the proposed location of the toxic incinerator and have outlined our concerns in the attached document.

Yours faithfully

**MICHAEL MC DONELL**  
*Club Vice Commodore.*

For inspection purposes only.  
Consent of copyright owner required for any other use.

## **Submission to the E.P.A. against granting a license to Indavar.**

Monkstown sailing Club and the Monkstown Amenity Group are deeply concerned about the health and fire implications of the toxic incinerator proposed.

Ringaskiddy Village residents and extensive housing developments planned in this area are within 5 minutes walking distance to site.

The new Third Level Education Nautical College - 800 plus people, directly under the 80 metre chimney are at very high risk, in an accident explosion situation, The proposed Indavar boundary is 20meters from the college boundary. In the event of an explosion, the only escape would be by water the site being a cul de sac. This means they would be trapped by fire. The fact that Indavar don't have enough fire-fighting water storage to fight a fire for longer than about two hours.

The Naval Base directly in line, just one Kilometre from the site with 1,000 plus personnel plus some residents is exposed at all times to the risks from the toxic emissions.

Cobh Town – The toxic exhaust gasses exiting from the proposed 80 metres chimney, at considerable volume, are directly in line, when the prevailing South winds are blowing with seven schools, a hospital, and four medical centres on the hill at Cobh town. This toxic emission cannot escape upwards when there is a low cloud condition over the harbour and this toxic gas will fall directly onto the afore mentioned areas, exposing both children and adults to a health hazard, possible fatal in time. – Population 15,000 approx. This highly populated area with on going extensive housing development is a front line recipient of emissions.

Monkstown, Glenbrook and Passage with approx. 9,000 population are in a similar position to Cobh.

Carrigaline – with a population of 16,000 are completely exposed to emissions when the wind is blowing from the South East, East and North East. Crosshaven and Currinbinny are exposed to full emission when wind is east or Northeast.

The Middleton area and the eastern side of the Harbour are exposed when the wind is blowing from the SouthWest, NorthWest and West. Thus all areas within the 40km radius "fall out zone" with variable wind conditions could be affected by the toxic fall out

Cork City and the Cork River Lee Basin, especially when there is low cloud air inversion conditions (a regular occurrence) is at high risk from toxic fall out, in prevailing wind directions.

In the Ringaskiddy Industrial Area, with thousands of employees they also could be exposed to the toxic fall out from this proposed incinerator. With Seveso type plants close by a fire disaster would be catastrophic.

While the human element is at risk it will also affect agriculture, including crops and animals, and the fish in the harbour, especially at risk from toxic liquids escaping into the harbour through the porous nature of rocks in the foundation of this site and in the excess water overflow from flood conditions as experience on the 28<sup>th</sup> and 29<sup>th</sup> of Oct. 2004.

The M.B.S.C. sailing club (one of three in the harbour area) as part of the amenity of this area sail in the immediate area, and run very high take up sailing courses for children in the summer.

The area of significant scenic value in the Monkstown area hosts a huge amount of fishermen along the Heart Health Walk, which has been developing greatly over the last 5 to 6 years.

The big liners which for the past number of years have been coming in big numbers sometimes 3 a week, a huge asset to our tourism would be affected. Would the E.P.A. grant a license for a Toxic Incinerator in the Phoenix Park? That is what the harbour is to all of Cork.

From the planning prospective – under future judicial review.

The EIS (Environment Impact Statement) is inadequate and fails to comply with the mandatory requirements.

### **2-3 Contrary to National Policy**

The development is contrary to the National Hazardous Waste Management Plan:

- With waste prevention as the top priority and first step in the Plan, it is premature and would tend to inhibit achievement of waste prevention targets.
- Its scale is considerably in excess of that envisaged for thermal treatment in the Plan.
- There is no concurrent or prior provision for landfill of hazardous waste generated by the incinerator, as envisaged in the Plan.

### **4-8 Contrary to County Policy**

#### **The Cork Waste Management Plan:**

- makes no provision for thermal treatment of either hazardous or non-hazardous waste.

#### **The Cork County Development Plan 2003:**

- precludes contract incineration anywhere in the county
- specifies the proposed site as suitable only for large, stand-alone industry and advocates Ringaskiddy as a location for port-related use aims to preserve the views from scenic routes in Monkstown and Cobh.

### **9-11 Site unsuitable**

- The site's topography, climatic conditions, geology, hydrology, and the risk of erosion and flooding make it fundamentally unsuitable for the proposed development.
- Its proximity to high-density housing would be seriously injurious to residential amenity.
- At the end of a peninsula, with a single access road, the excessive increase in traffic would be prejudicial to public safety and amenity.

### **12-13 inadequate road infrastructure**

- The development would endanger public safety by reason of serious traffic hazard and obstruction of road users.
- It would be premature given that the inadequate road infrastructure is unlikely to be rectified within a reasonable period. There is no railhead.

### **14 Risk to public safety**

- With the proximity to the National Maritime College, and to other Seveso II plants, the inadequacy of emergency infrastructure, and a location at the end of a peninsula, the development could pose significant risks to public safety in the event of a major accident.

### **WHO Guidelines**

WHO (World Health Organisation) guidelines include the following exclusionary criteria, all of which apply to the Ringaskiddy site:

- coastal areas subject to floods

Atmospheric conditions such as inversions which would prevent safe dispersal of accidental releases

- Proximity to sensitive installations storing flammable or explosive materials.

### **Dispersal of accidental emissions**

Even with state-of-the-art technology and regular monitoring, emission control equipment is only mechanical and can and does fail. The result will be uncontrolled discharges to the atmosphere, potentially well in excess of permitted limits.

Cork Harbour is a valley that regularly experiences thermal inversions (exclusion factors in the WHO guidelines). Pollutants released under these conditions will be trapped in the harbour area, contaminating living organisms, air, soil, and the food chain.

Why was this not considered in the EIS? Because the model used to predict the impact of emissions was based on meteorological data from Cork Airport, which is 12 miles away, 100m higher, and rarely experiences thermal inversions.

Article 13(2) of the Seveso II Directive requires that provision be made so that the public is able to give its opinion in prescribed cases. Everything that could have been put in place to hamper this directive has been done to the above communities.

Article 12 of the Seveso II Directive requires that the objectives of preventing major accidents and limiting their consequences be taken into account for man and the environment. The incidents at Bhopal and Mexico City clearly showed how the consequences of an accident could become much worse where they are residential areas in the vicinity. The Seveso accident (1976) itself involved the evacuation of over 600 people and as many as 2000 were treated for dioxin poisoning. The map enclosed shows that the population involved in the harbour would greatly exceed those kinds of figures. While on the 29<sup>th</sup> of Oct this year, a population of at least 16,000 could not get off the Great Island of Cobh because of flooding of the only bridge Belvelly connecting it to the mainland.

Any person who takes the time to come and visit this site could not be of the opinion that this is a suitable site for a toxic incinerator, and therefore Indaver in this site should not be granted a licence. Until such time that the health concerns of the population can be taken into consideration and a system to routinely monitor the health of humans who live next to a hazardous incineration it would be reckless to grant such a license. The least we can expect of an environmental protection agency is that it protect our environment for the health of these communities and not just industry, and refuse to grant a license until such precautions are set up and running.

Signed.

*M. B. S. C.*

**Ref. Cork Harbour Map.**

**M. B. S. C.**

For inspection purposes only.  
Consent of copyright owner required for any other use.

3,000 People

15,000 People

