Sub(28)

167-1

Karen Vaughey

From: Ken Macken
Sent: 17 October 2002 09:30
To: Karen Vaughey
Cc: Wexford Receptionist
Subject: FW: Objection to Incinerator Plant in Duleek

The attached e-mail to info@epa.ie might best be treated as a submission for 167-1.

From: Wexford Receptionist
Sent: 17 October 2002 09:23
To: Ken Macken
Cc: infomail
Subject: FW: Objection to Incinerator Plant in Duleek

For info.

Tks A.

-----Original Message-----
From: Brenda Maguire [SMTP:brenda_maguire@yahoo.com]
Sent: 16 October 2002 17:39
To: info@epa.ie; independent.letters@unison.independent.ie
Cc: taoiseach@taoiseach.gov.ie; bord@pleanala.ie; editorial@unison.ie
Subject: Objection to Incinerator Plant in Duleek

To: The Environmental Protectional Agency and The Editor, Irish Independent

Dear Sir / Madam:

The following is a direct quote from today's *Independent:*

"A BORD Pleanala hearing into plans to build a giant incinerator in Co Meath will next week refuse to deal with claims that toxic emissions from it would be a danger to public health.

The Board confirmed to the Irish Independent yesterday that the inquiry will deal solely with planning matters in this case and not with any concerns about the possible risk of environmental pollution."

and

"Issues surrounding environmental pollution are dealt with by the Environmental Protection Agency when it considers applications for integrated pollution control licences. An incinerator would have to have such a licence in order to operate."

As a concerned citizen and environmentalist, I urge you to take note of the following information and ultimately insist on the abolition of all current and prospective incinerator plants in Ireland.

Toxins released from incinerators with energy recovery, where mixed waste is burnt, pose health and environmental risks that will impact not only the present but future generations.

Modern incinerators with sophisticated pollution control equipment will trap some of the toxic metals in the fly ash -- the residue captured by the pollution control devices. Ironically, this means that the better the air pollution control, the more toxic the ash.

Not only are toxic metals captured in the fly ash, but a number of toxic compounds, including dioxins and furans, are actually created on the fly ash particles in a process called post-combustion formation. A hundred times more dioxin may leave the incinerator on the fly ash than is emitted into the air from the smoke stacks.

The toxicity of the fly ash means that an expensive hazardous waste landfill site must be found for its disposal. However, all landfills eventually leak; the dioxins and heavy metals in the fly ash will eventually find their way into the ground waters around the landfill and then perhaps into drinking water sources or the sea. A modern, properly regulated landfill will only delay this process, not prevent it.

The waste that is fed into the incinerator, burns. The heat breaks down some of the waste into their chemical constituents. These constituents either react amongst themselves to form new chemicals or remain in their original form.

The chemicals escape along with the smoke via the smokestack, with the flue gases or in the ash.

Ash:

The ash is taken to a dump yard where it is disposed. The contaminants like heavy metals in the ash can either leach into the soil or the ash is carried by the wind and deposited on land, vegetation and water bodies. Animals during foraging on vegetation ingest this contaminated ash.

Humans then consume animal products (for example: milk, meat)

Smoke:

Smoke is carried to long distances by wind. When smoke particles settle down they are consumed during the process of ingestion. This begins with the smallest species, which are then consumed by the larger species and this continues till the top food chain. Thus in every point of the food chain the toxic pollutants from the incinerators are consumed. The levels of intake increase with the size of the animal as it corresponds to its appetite and quantity of consumption of the smaller species.

This is called **biomagnification.**

In terms of environmental costs, which is often not taken into consideration while calculating the costs of energy recovery from incineration, Friends of the Earth, UK, has compared the amount of carbon emission, major contributor to the global warming, from incineration versus recycling and composting of household waste. It estimates that up to 4.5 million tonnes of carbon emission can be saved each year by recycling and composting of household waste as compared to incineration with energy recovery.

Truth No1: INCINERATION DEMANDS CREATION OF WASTE - IT ENCOURAGES WASTE PRODUCTION.

Truth No.2: INCINERATION DESTROYS RESOURCES.

Truth No.3: INCINERATION IS NOT FINAL DISPOSAL IT REQUIRES LANDFILLS

Truth No.4: INCINERATION PRODUCES TOXIC ASH AND SMOKE

Truth No.5: INCINERATION IS A VERY EXPENSIVE TECHNOLOGY

Truth No. 6: THERE IS NO SUCH THING AS ECO-FRIENDLY INCINERATION

Truth No.7: INCINERATION IS ENERGY-INTENSIVE

Truth No.8: INCINERATION WILL DESTROY LIVELIHOOD OF THOUSANDS OF PEOPLE.

Truth No.9: ENERGY FROM INCINERATION IS NON-RENEWABLE

Truth No.10: INCINERATION DOES NOT COMPLETELY BURN ALL THE WASTE

There are no "magic machines" which can solve the trash problem.

Trash is a not high tech problem. Technology has a role to play but only when judiciously applied to carefully selected components of the waste stream. The real solution has more to do with organization than it does with machines. Solving the trash problem takes a lot of hard work from municipal officials plus a little daily effort from our citizens. From the citizens' perspective, trash is made by the ten things at the end of our hands, and if we want a solution that we and the planet can live with, it is those ten things that have to be co-opted from the very beginning. In essence, the solution begins with source separation. Trash is made by mixing. Trash is avoided by separating. Avoiding expensive and potentially dangerous incinerators and huge regional landfills requires keeping our discarded items in several well defined categories:

1) avoidables

2) reusables

3) compostables

4) recyclables

5) toxic materials, and

6) materials which are currently non-recyclable or compostable

There are five key principles that need to be satisfied to make the source separation approach successful. There are to make sure that the program:

A) Be kept simple. Do not bring on complicated machinery until you have exhausted the low tech alternative.

B) Be kept local. Do not export or import trash. Exportation of trash means the exploitation of distant communities who are usually too poor or too politically weak to resist the process.

C) Be integrated with the local community. In each community there is usually a

large number of people who are eager to help solve this problem. Their services and goodwill need to be harnessed effectively. Moreover, many of the solutions to waste can be integrated well with other community gardens and other community building activities. This makes the waste stream unnecessarily large.

D) Be integrated with the local economy. Handled well, source separation strategies and affiliated activities can generate many local jobs and local business opportunities. A key question for decision makers is: "How can I make sure that every dollar we spend on trash beyond what we spent on the local landfill is made to work twice. Once to solve the trash problem, and twice to generate local economic activity?" It is here, especially in developing countries, where the latter leaves the community and probably the country. Money spent on reuse, repair composting, recycling stays in the community. A study in North Carolina, USA, has documented the enormous impact recycling has had in their economy. (1)

E) Move in a sustainable direction. We are not going to reach sustainable societies overnight. However, it is important to move in the right direction. A policy which moves to minimize the amount of material that is burned or buried in the right direction. From a planetary perspective, sustainable development requires the throughput of matter and energy through our economy, while looking for other ways of generating satisfying lives. This principle relates strongly to the stimulation of community development as discussed in the principle C) above.

Brenda Maguire

cc: An Bord Pleanala

Unison.ie NewsEditor

Louth-Meath Anti-Incineration Alliance c/o Irish Independent

An Taoiseach
