

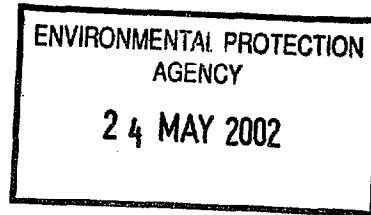
SUB. NO. 23.



27 Highfield  
Drogheda, Co Louth

14<sup>th</sup> May 2002

EPA  
PO Box 3000  
Johnston Castle Estate  
Wexford



Dear Sir/Madam

**Re: Waste Licence Application – 167-1 - Indaver Ireland  
Waste Management Facility – Carranstown – Co Meath**

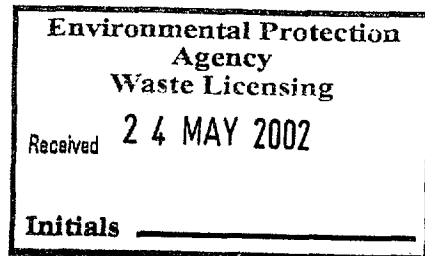
Please find attached a further submission on behalf of the No Incineration Alliance in respect of the above waste application from Indaver Ireland. We intended enclosing this with our submission of 13<sup>th</sup> May 2002, but omitted it in error.

Please keep us advised of any developments on this file. Please direct all correspondence through the above address.

Kind regards

A handwritten signature in black ink, appearing to read "Aine Walsh".

Áine Walsh MSc Env Sci  
FOR AND ON BEHALF OF – THE NO INCINERATION ALLIANCE



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Carrona  
Painestown  
Dublin Road  
Drogheda  
Co Meath

9<sup>th</sup> May 02

Environmental Protection Agency  
PO Box 3000  
Johnston Castle Estate  
Wexford

**Re:- Waste Licence Application – 167-1 – Indaver Ireland  
Waste Management Facility – Carranstown – Co Meath**

Dear Sirs

I refer to above application for which planning permission was granted by Meath County Council. Being a resident of the area I reject many of the arguments put forward by Indaver Ireland in favour of the proposed facility. Although I am not qualified in many of the technical aspects relating to the operation of the plant I am sure I'm not alone in my concern regarding the health and safety of the public at large. Should the licence be granted it may be decades before we or our offspring become aware of the consequences of locating an incinerator plant in such a location or indeed at all when we consider that no attempt has been made to re-cycle or manage our waste. In the construction industry we call this "fire brigade" action ie last minute decisions which often lead to accidents or at best poor quality results.

Indaver have prepared a Waste Management Application which contains many claims with regard to the health and safety and welfare of the public both in the immediate vicinity of the plant and farther afield. The report is backed up by scientific evidence – facts and figures that only a scientist in the field of waste management could understand. I can only trust that such an individual(s) will adjudicate on the application.

I attach herewith some observations in relation to the application and trust that they will be considered in such an adjudication.

Many thanks.

Yours sincerely



Brian Lambe  
MBAEng., FASI, MCIQB, MBA



**Carronstown Waste Management Facility  
Waste Licence Application  
General Comments on Application**

**Application Form and Attachments A-D**

- |               |               |   |
|---------------|---------------|---|
| 1. Page 33 –  | Parag G2 –    | Aftercare Management Plan – Not required why not?   |
| 2. Page 39 –  |               | Surface Water Monitoring – Not required why not?  |
| 3. A1-1 P8    | Parag 2.3.2   | Combustion – Disposal of residual ash to construction industry or non-hazardous landfill. No such facility in Ireland.                                    |
| 4. A1.1 P13   | Parag 3.1     | Air Discharge –40m stack; inhaled intake of dioxins in the immediate vicinity of site cannot be confirmed.  |
| 5. A1.1 P14   | Parag 3.2.1,2 | Climate – SO <sub>2</sub> , Nox and CO <sub>2</sub> emissions – the facts are not sustainable.  |
| 6. A1.1 P15   | Parag 3.3.1   | Surface Water – spillages will no doubt occur and the possibility of ground water contamination cannot be ruled out.                                      |
| 7. A1.1 P16   | Parag 3.5     | Traffic – No doubt there will be additional traffic. At minimum additional access/egress should be constructed in the event of an emergency at the plant. |
| 8. A1.1 P21   | Parag 5.2     | Cessation of Activity – Indaver undertake to return the site to a satisfactory state. This would be practically impossible bearing in mind the activity.  |
| 9. D2.1 P11   | Parag 4.1     | Waste to Energy Plant – Technology is proven/reliable. Not backed up by facts. Look at plant closures.  |
| 10. D2.1 P20  | Parag 4.3.3   | Emissions – bottom ash only and disposal. This may not be correct and is not backed up by facts.  |
| 11. D2.1 P25  | Parag 4.4.5   | Abnormal Situations – Boiler tube leaks consequences. We are faced here with a “what if” scenario that could have detrimental consequences.               |
| 12. D2.1 P42  | Parag 4.8.5   | Abnormal Situations – Removal of SO <sub>2</sub> as per item 11.  |
| 13. D2.1 P 47 | Parag 4.10.3  | Emissions – List of same- safe? Again Indaver makes a claim which is not substantiated or at least unconvincing.  |

**Application Form and Attachments E-L**

- |              |             |   |
|--------------|-------------|---|
| 1. E2.1 P 13 | Table E.2.2 | Hazardous Waste types and quantities – too loose  |
| 2. E2.1 P 14 | Table E 2.3 | Non Hazardous Waste types? Has any other qualified body or individual checked that the facts as stated? |
| 3. E2.1 P 15 | Table E.2.4 | Other Wastes – see list. Similar comment to item 2.   |
| 4. E3.1 P 1  | 2+3         | Materials Recycling Facility & Waste to Energy Plant<br>Again how can we be sure of this?               |
| 5. E3.3      |             | Waste materials have high degree of homogeneity? Is this true or merely Indaver’s claim.                |
| 6. E3.3      |             | Visual inspection? I’m sure the greater public would agree that each load will not be inspected.        |
| 7. F2.1 P1   |             | Bird Control – Not necessary during operation of plant? Why not?  |

- 8.F3.1 P2 Dust Control – Minor during construction? From experience of construction work this is untrue.
- 9.F4.1 P3 Parag 2 Waste to Energy Plant –fire in waste bunker – In my opinion the risk of a water leak is greater than claimed.
- 10.F4.1 P4 Parag 2 Waste to Energy Plant – water from fire fighting retention tank – disposal to licensed treat. facility?
- 11.F8.1 P5 Parag 3.3 Possible Cumulative Impacts – transport for operatives. Again this is not realistic in this day and age.
- 12.H1.1 P2 Parag 2.1 Impact on Air Quality – stack emissions – Indaver claim little or no impact. Who checks claim?
- 13.H1.1 P9 Parag 2.5 Stack Height Determination – why stop at 40m – visual?
- 14.H1.1 P15 Parag 2.6.8 Dioxin Inhalation compared to milk in Meath/Dub areas Again has any independent study been done to back up this serious claim?
- 15.H1 2 P5 Parag - Summary of Study Conclusions – results indicate that the impact is minor and limited to immediate area. Does this mean that we can kill all the living creatures in the immediate vicinity of the site and be happy?
- 16.H6.1 P2 Parag 2.2 Impact on Hydrogeology – leaks from bunded area. Difficult if not impossible to avoid and the consequence.
- 17.H9.1 P1 Parag 2.1 Discharge to Surface Water – overflow to wet drain. Potential for contamination of surrounding ditches is high with consequent risks.
- 18.H11.1P1 Parag 1 Wastes Arising – collection/disposal of boiler ash Again expert opinion must be sought to confirm Indaver claim.
- 19.H11.1P8 Parag 5.2/3 Currently no facility for disposal of boiler ash – export?

To summarise my main concern in all of the foregoing is the fact that the information submitted by Indaver, particularly technical may not be checked by professionals who are qualified in the field and that we are accepting Indavers claims. In addition the “what if” scenario is not mentioned anywhere in the report and I feel this is a major concern of the public. We have seen what can happen elsewhere eg Sellafield and Chernobyl and I’m sure these accidents were not anticipated at the outset. Most of us are probably aware at the unease of the general public at the happenings particularly at Sellafield and more unease regarding what we are not told but is leaked later. The possibility of getting Sellafield closed is little or none. Similarly once Indaver are up and running regardless of the problems the chances of getting it closed would be minimal. Mitigating measures would be the best we could expect.

The other issue of concern is the “self regulating” and monitoring of the plant. We are all familiar with conditions pertaining to planning permissions and how these are often ignored due to logistical difficulties in policing. I do not see the Environmental Protection Agency monitoring the plant on a continuous or even on a regular basis.

Finally should the plant proceed we may not know for possibly twenty years what harm if any is being caused to the general public and if so what. We are only now experiencing health problems in some cases from exposure to asbestos fibres which operatives at the time did not consider dangerous or take adequate precautionary measures. It is too late when the damage is done.

7<sup>th</sup> May ‘02

B Lambe

MBEng., FASI, MCIQB, MBA.