



North Bord  
Eastern Sláinte  
Health an Oir  
Board Thuaiscirt

COMMUNITY CARE SERVICES,  
Co. Clinic,  
Navan, Co. Meath.

Tel: (046) 21595, Fax (046) 22818

Sub ⑥

Ms. Karen O'Brien,  
Programme Manager,  
Waste Management Licensing,  
PO Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.

8<sup>th</sup> February 2002

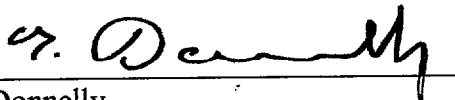
Environmental Protection Agency Waste Licensing Received 13 FEB 2002 Initials... <i>DR</i>
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**Re: Application by Indaver Ireland for a Waste Management Facility at  
Carranstown, Duleek, Co. Meath.  
License Application Ref: 167-1**

Dear Ms. O'Brien,

Please find attached our observations on this application.

Yours sincerely,

  
M. Donnelly  
Principal Environmental Health Officer

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Mr. M. Donnelly,  
Principal Environmental Health Officer,  
County Clinic,  
Navan,  
Co. Meath.

7<sup>th</sup> February 2002

**Re:- Application by Indaver Ireland for a Waste Licence for a Waste Management Facility at Carranstown, Duleek, Co. Meath.  
License Application Ref. :- 167-1**

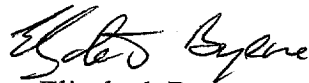
In order to properly assess this application request applicant to submit the following further information :-

1. The applicant shall restructure the proposal taking into account European and National Integrated Waste Management Policy i.e. Waste Management – Changing Our Ways, Department of the Environment and Local Government, 1998 and the European Directive on Incineration (2000/76/EC). The developer proposes to use the sorting bay only when a delivery of dry recyclable waste is received while unsorted waste shall be disposed of in the incineration process. This is contrary to the basic principles of the waste management hierarchy of prevention, minimisation, reuse and recycling.
2. The Environmental Impact Statement does not provide a breakdown of source and quantity of municipal, industrial and commercial waste. The applicant shall list explicitly the category and quantity of waste as required by the European Directive on Incineration (2000/76/EC).
3. Alternative sites for this development shall be fully assessed and examined in accordance with EIS requirements.
4. The Environmental Impact Statement referred to the World Health Organisation's criteria for Site Selection for New Hazardous Waste Management Facilities (1993). These criteria are not confined to landfill activities as stated in the applicant's submission and specifically exclude areas with limestone deposits. The applicant shall clarify this issue.
5. The limestone bedrock constitutes a regionally important aquifer which is karst and fractured and is therefore susceptible to ground water pollution. This aquifer is the sole source of water for numerous houses in the vicinity. The impacts of this aquifer underneath the site shall be fully assessed and discussed.

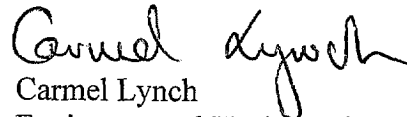
19. Details of the location of the puraflo waste water treatment system and percolation area shall be submitted. In addition, request applicant to submit details of water table and soil percolation tests.
20. The management policy and procedures of the plant shall be described i.e. operational, quality control and environmental management procedures.
21. Back- up or failsafe procedures which would effectively mitigate very severe impacts in the event of failure of the proposed measures shall be submitted.
22. A detailed description of the manner in which waste will be transported from the site i.e. enclosed waste containers or fully enclosed collection vehicles for the transport of waste to and from the site shall be submitted.
23. Detail proposed method and location of wheel washing facilities.
24. Measures taken to limit movement of heavy goods vehicles on and off site during unsociable hours shall be indicated.
25. A public complaints procedure shall be addressed.
26. The applicant shall submit a detailed rodent control programme for the site.
27. Submit proposals for the control and monitoring of dust and noise during the construction phase of the development.
28. Applicant stated in Section 2.7 of the E.I.S. that a decommissioning plan would be submitted as part of the license application. No such plan has been included. The applicant shall address this issue.
29. Clarify method and frequency of leachate tests which shall be carried out on flue gas cleaning residues and boiler ash. Request applicant to state parameters which shall be analysed in the above tests in order to determine the hazardous nature of the waste.
30. Applicant shall submit details on the transport and final destination of both boiler ash and flue gas cleaning residues. The weight and volume of the above solid wastes shall be quantified.
31. The disposal of bottom ash to landfill is not in keeping with the basic principles of waste management. The applicant stated that the ash can be treated in an ash recovery plant to render it suitable for road construction. Request applicant to provide full details of the ash recovery process. Indicate process method and location of the plant.

32. In section 2.4.2 of the E.I.S. the applicant states that in the case of both lines being shut down typically for 1-2 days per year fans will be kept on line as long as possible to maintain the bunker under negative pressure. Any odours will be discharged via the 40m stack. During these periods the waste in the bunker will be sprayed with odour suppressing chemicals to minimise odours. Masking of odours is unacceptable - All odours shall undergo treatment prior to extraction. Please submit proposals for the treatment odours during this shutdown period.
33. Request applicant to clarify method that was employed to determine worst case air emission data and state where this information was sourced.
34. Section 5.5 states that an assessment shall be submitted to the EPA to ensure that noise emissions from the plant shall not exceed given limits at any sensitive noise receptor. No such assessment was included in the E.I.S. This issue shall be addressed.
35. Provide further details on the silt trap which shall be used during construction i.e. management and location of same.

**Note:** The Environmental impact statement claimed that the applicant consulted with the North Eastern Health Board during the pre-application process however no such consultation took place.



Elizabeth Byrne  
Senior Environmental Health Officer



Carmel Lynch  
Environmental Health Officer

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