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Environmental Protection Agency  
Waste Licensing  
Received 30 JAN 2002  
Initials KE

To: The EPA  
P.O.Box 3000  
Johnstown Castle Estate,  
Co Wexford

ENVIRONMENTAL PROTECTION AGENCY  
30 JAN 2002

L.P.A.I. c/o  
Mr Ollan Herr  
"Túr na Gaoithe"  
Philipstown  
HBX  
Dundalk  
Co. Louth.

Date 28/01/02

**OBSERVATION by L.P.A.I. "LOUTH PEOPLE AGAINST INCINERATION" to the granting of a Waste Licence by the EPA to the Indaver Waste Management Facility (which includes Incineration) at Carranstown Duleek Co. Meath.**

**Reference: Meath County Council Number 01-4014 ( Planning Ref)**

Our Objection will deal primarily with:

- 1 . The Health Implications of Dioxins from Incinerators.
- 2 . Our Safety concerns regarding the Handling, Transportation, Location and Disposal of various Incinerator Ashes.
- 3 . Failure to comply with the EU Waste Management Priority Hierarchy.

**1. HEALTH IMPLICATIONS OF INCINERATION**

Emissions from "state of the art" incinerators continue to contain dioxins, furans and heavy metals which have a proven carcinogenic effect. Based on human epidemiology data 1997, dioxins were categorised by the International Agency for Research on Cancer (IARC) as a known human carcinogen. Solid waste incinerators are the worst culprits for Dioxin generation due to incomplete combustion. The burning of any waste product containing chlorine will produce Dioxins. No where in a municipal incinerator are Dioxins destroyed rather they are sent out in the emissions or are left in the ash. The health hazards associated with Incinerators emanate from Air Emissions and Toxic Ash.

At the core of our anxiety concerning this technology is the unreliability of the monitoring technology for Dioxins and the huge expense required for a comprehensive monitoring program of dioxins in milk.

Researchers from Britain have found elevated instances of cancer in the Lungs, Larynx, and the Bladder within 7.5 km of these incinerator locations. The British Environmental Protection Agency has attributed 88 deaths annually due directly to incinerators, in addition to hundreds of respiratory illnesses. The additional health hazards include altered sexual development, male and female reproduction problems, suppression of the immune system, diabetes and a wide range of hormonal effects. Foetuses and new-borns are the most sensitive to dioxin exposure. The effects of dioxin emissions are apparent over a range of 30 miles or more.

**2. THE HANDLING, TRANSPORT AND DISPOSAL OF THE VARIOUS INCINERATOR ASHES.**

\* . **Handling of ash.** The EIS does not demonstrate, how or if, the flue ash is to be kept separate from the bottom ash and boiler ash. Nor does it illustrate the risks of disposing of toxic Flue Ash in an inappropriate landfill. We would also contend that the bottom ash and

Boiler ash will contain Dioxins and Furans and therefore should not be land filled in regular municipal Landfill sites.

The EIS also does not demonstrate any commitment by the applicant to keep an inventory of the various ash streams which includes the highly toxic flue ash.

\* . **Transport of Ash.** The EIS fails to identify the hazards associated with the transport of any of the separated ash waste streams, particularly in respect of the Flue Ash which is highly toxic. The EIS also fails to identify the designated routes on which the ash will be transported. The communities who live along the routes will be exposed to contamination in the event of road accidents involving the transport lorries.

**We respectfully contend that as hazardous and toxic ash production are an integral part of the incinerator process, the final location of all ash should be clearly indicated now, in the same way as the location of buildings are also required to be clearly indicated.**

**We submit that the additional toxins that are created in the incineration process poses a much greater threat to public health than does the standard landfill.**

\* . **Disposal of Ash .** It is noted that currently there is no designated Hazardous Waste Landfill site in this country at present. It is also noted that the so called *Non Hazardous Ash* from Incineration will still require to be land filled in the conventional Landfill sites. The continuation of the export of toxic material out of the State or out of the North East Region is contrary to the EU principle of dealing with waste in its own designated waste region.

It is noted that Indaver have applied for planning permission for a hazardous waste facility in Cork. If granted this will necessitate the transport of toxic Flue Ash from the NE Region to the Southernmost end of the country.

There will be hazards associated with the recycling of building materials containing Dioxins. In the document "Waste Management, Changing our Ways" the government target is for 85% recycling of construction and demolition waste over a fifteen year period. If roads and buildings which have incinerator ash already added to them are to be recycled in this way, the dioxins, furans and heavy metals will continue to escape into the open environment at each recycling stage for generations to come. Future demolition of buildings will pose a health risk to the public from ash dust, it will therefore render the future recycling of these materials unsafe due to their toxic content. The ultimate safe way to deal with hazardous ash is to simply not create it by not having incinerators at all in the first place.

### **3 . FAILURE TO COMPLY WITH EU WASTE MANAGEMENT HIERARCHY.**

Incinerators by their very nature require guaranteed commitment's for large volumes of waste in order to make them function on a continuous basis and be economically viable.

**The granting of a waste licence for incineration would undermine the European Community's Waste Management Policy with its primary emphasis on Waste Prevention, Reuse, Recycling and Recovery.**

Signed Ollan Herr.....Ollan Herr. PRO

#### **ADDITIONAL INFORMATION**

We suggest that you view a video made by the BBC recently which highlights our concerns regarding the disposal of incinerator ash.

We also suggest that you also view the video which deals with the concept of "Zero Waste" or total re use and recycling. We believe that the choice in the "North East Region" is not one of Incineration or Landfill but rather how we should re cycle or re use our materials and resources.

If there is a genuine interest in viewing these videos then please ring us and we will send you a copy. (042) 9377689.Tel (042) 9377691. Fax