

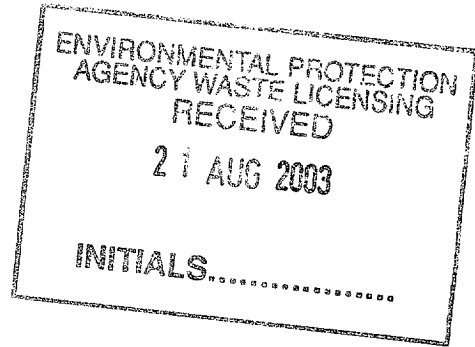


North Bord
Eastern Sláinte
Health an Oir
Board Thuaiscirt

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

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

Karen Vaughey
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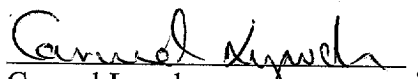


19th August 2003

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

I attach a report regarding the above licence application.

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Carmel Lynch
Environmental Health Officer

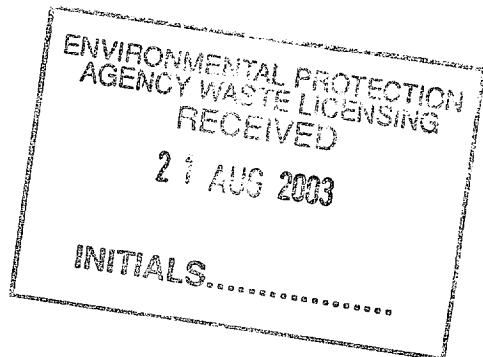


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Mr. M. Donnelly,
Principal Environmental Health Officer,
County Clinic,
Navan,
Co. Meath.

13th August 2003



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

I refer to additional information submitted by the applicant in relation to the above application. According to the predicted air emission values from the development, the maximum predicted concentrations are within Irish and European air quality limits and the WHO Guideline values.

I would like to point out that clarification and information were requested on a number of issues in my report dated 5th February 2002 which have not been addressed. I attach a copy of this report.

CL

Carmel Lynch
Environmental Health Officer

M. Donnelly
Principal EHO
18/8/03



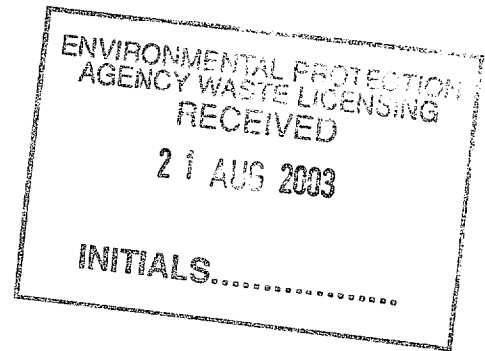
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Mr. M. Donnelly,
Principal Environmental Health Officer,
County Clinic,
Navan,
Co. Meath.

7th 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.

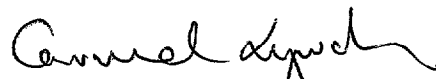
6. The effects of the removal of overburden during preparation of the site were not discussed, nor were the impacts addressed in relation to the aquifer.
7. The effect of the development on the drawdown of local wells shall be addressed.
8. The impacts of the development on the gas line running directly underneath the site were ignored i.e. potential for gas leaks, fire, explosion. These impacts shall be fully addressed.
9. The applicant shall carry out a feasibility study on the sourcing of waste which would ensure the viability, sustainability and continued efficient operation of the incineration plant.
10. The applicant proposes to collect recyclable waste on the site. Applicant shall submit details as to how or where this waste shall be recycled.
11. The amount of green waste which will be accepted on site must be quantified. Storage facilities and method of composting shall also be included.
12. Details on the stockpiling of waste – capacity and length of time waste will be stored on site – for both waste bunker and community recycling park.
13. The applicant failed to submit sufficient details of the processes involved in this development as follows:
 - Site layout was not adequately detailed.
 - Processing areas and systems were not fully indicated and described. These areas shall be clarified on plan.
14. The Environmental Impact Statement states that boiler ash shall be sent to landfill whilst flue gas cleaning residues shall be removed to a hazardous waste landfill. Boiler ash is classed as a hazardous waste under the EC Council Directive on Hazardous Waste 91/689/EEC. However the applicant is not treating it as such. The applicant shall provide for the segregation of flue gas cleaning residues and boiler ash.
15. Provision shall be made for the visual inspection, weighing of each load, a storage tank inspection area for waste and quarantine area for waste which cannot be dealt with by the plant i.e. hazardous or clinical waste.
16. Details regarding the storage and treatment of overburden shall also be submitted.

17. The applicant failed to give sufficient detail with regard to volume of surface and rain water, site drainage layout, run off and run off controls. The direction and relative magnitude of flow of surface water movement shall be quantified.
18. Provision shall be made for the retention of firewater on site to avoid the potential threat of ground water pollution.
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 and quality control 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 considered.
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 more details on this process.

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 clarify the above statement.
33. Details on an environmental monitoring programme were not included in the E.I.S. Request applicant to submit details of programme which shall include frequency and method of monitoring of each environmental impact. The programme shall also include actions which shall be taken in case of non-compliance.
34. Request applicant to clarify method that was employed to determine worst case air emission data and state where this information was sourced.
35. 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 receptor. No such assessment was included in the E.I.S. This issue shall be addressed.
36. Clarify whether or not water which will be discharged to the wet drain to the west of the site during periods of heavy rainfall when the capacity of the water holding tank is exceeded shall be subject to treatment/interception prior to discharge. The effects which this will have on the drain and subsequently the River Nanny shall be addressed.
37. 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