



“Louth People against Incineration”.
Túr na Gaoithe
Philipstown
HBX
Dundalk
County Louth

Environmental Protection Agency
Waste Licensing Division
Johnstown Castle Estate
County Wexford.

Date: 3 / April / 2003

Re: Indaver Ireland Waste Application Reg No 167-1

Location of Development: Carranstown, Duleek, Co Meath.

I wish to object to the above on the following grounds:

1. The Incinerator will produce bottom ash that will contain various toxic pollutants. These pollutants will inevitably end up in the wider environment by land filling.
 - All polyethylene plastic liners used in modern landfills will eventually leak. This plastic cannot be reasonably expected to last for longer than 300 years or so. Once this happens the toxins will gradually leach into the water table.
 - Polyethylene liners are also vulnerable in the short term. Chlorine or bromine gases which can potentially result from the mixing of commonly available household chemicals are known to be able to break down polyethylene.
 - The EPA licence that has been granted to the Knockarley Super-dump in County Meath does not require any type of measurement of the heavy metal or dioxin content from bottom ash arriving from the Indaver Incinerator. If the extent of the toxic hazard from incinerator bottom ash is not to be measured then the EPA they will be unable to estimate the degree of threat that these various heavy metals and other dangerous chemicals pose to the general public.
 - The option of using ash for road building or the making of concrete blocks likewise poses a long-term hazard. As heavy metals and dioxins will remain toxic for very long periods of time there will always be a danger that these toxins will be exposed to the public once these roads or buildings are altered or replaced or recycled. The EPA must be specific about the methods of bottom ash disposal that it will and will not allow.
 - The EPA or local authority is at present unable to properly monitor or account for the movement of waste within or out of the state. Examples of this are the waste dumping in Wicklow or the export of waste to Northern Ireland. For this reason it is doubtful that they will be able to accurately account for the final destination or the know routes of all the ash streams from the Indaver Incinerator.

- Neither a risk assessment nor health impact statement has been carried out on the possibility of an accident involving lorries carrying incinerator ash. The EPA in its role as protector of the environment cannot ensure the safety or long-term health of those residents living along the routes of the incinerator ash trucks.
- 2. The EPA has failed to adequately monitor pollutants in the past. Askeaton in Limerick is the most obvious example. The Indaver plant should not be granted a licence since the monitoring of all potential pollutants from the stack, in air, cows milk, and in all ash is unlikely to be carried out in a comprehensive manner. The total quantities of toxins, like heavy metals, in bottom ash should be measured.
- 3. The EPA does not have the resources to measure and monitor these pollutants. It has not at present, the resources from the Government nor is it likely to obtain adequate fees from Indaver to fully cover the costs of the comprehensive monitoring of all the potential toxic chemicals- most importantly dioxins and furans, that emit from incinerators. The EPA will thus be unable to assure the general public of the resultant daily intake of dioxins via the air we breathe or via the dairy produce grown in the East Meath and South Louth area.
- 4. The EPA must assess the safest technology in dealing with waste. It therefore should consider the concept of Zero Waste as a possible alternative approach. Since the Indaver application originally included recycling the EPA should grant a licence for this operation only. They should not be granted a licence to operate the incinerator.
- 5. The EPA should not grant a licence to Indaver to operate an incinerator in Ireland since its incinerator has exceeded the permitted Dioxin Limits in Belgium. Its unsafe track record in operating an incinerator in the past disqualifies its application for a licence in Ireland.

We would appreciate an acknowledgement of our submission.

Yours Sincerely



Ollan Herr Pro LPAI

Louth People against Incineration.