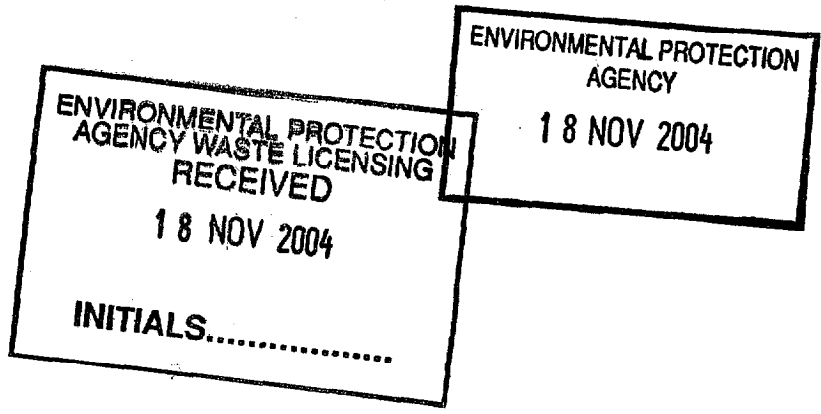


Obj (7) 167-1

Mr Arthur Morgan TD,
Cllr Joe Reilly
Cllr Imelda Munster,
Cllr Matthew Coogan,
Cllr Dom Wilton,
Cllr Michael Gallagher



All of:
46 Magdalene Street,
Drogheda,
Co Louth.

17th November 2004

Reference: Objection to Granting of Waste Licence Register Number 167-1

A Chara,

We the above named, being Public Representatives wish to object, under the terms of Part V of the Waste Management Act 1996 and Waste Management (Licencing) Regulations 1997 (etc) and any other relevent legislation/regulation to the granting of a Waste Licence to Indaver Ireland to operate a facility at Carronstown, Duleek, Co Meath – Licence Register Number 167-1.

We do so on the following grounds:

- a) The granting of such a licence is premature as there is a Review of the Waste Management Plan for the subject area currently underway which may well prohibit the development of incineration facilities in this area/region.
- b) Major traffic hazards would arise from the carriage of the 170,000 tonnes of waste being brought in to this very rural area.
- c) Licence Condition number 1.1.1 states that the license is for a five year period. Why is such a lengthy period being licensed? Would a much shorter period not be appropriate, especially given that this is a completely new industry in our Country? This must be changed to a one year license, subject to application for renewal annually. This would afford residents and those with genuine environmental and health concerns an opportunity to raise these important issues annually.
- d) Insufficient monitoring is required under the terms of the Licence to adequately assess if Condition 1.5 is being met.
- e) Insufficient monitoring is available or even designed to meet the requirement of Licence Condition 1.10 (a). There are serious concerns regarding frequency and extent of monitoring. This ought to be sufficient grounds for refusing a Waste Management License to this applicant.
- f) Licence Condition number 2.2.1 should specify a period of time **prior** to any changes occurring in management to be notified to the Agency. Twenty-eight days should be the minimum.
- g) Licence Condition numbers 2.3.2.1 and 2.3.2.3 should require specific auditing at specific time periods to ensure compliance.
- h) Licence Condition number 3.2.1 should specify time periods for regular monitoring and analyses of groundwater.

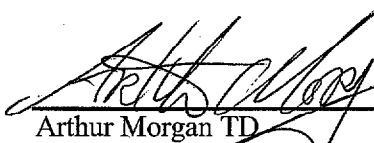
- i) Licence Condition number 3.2.4 should require monitoring equipment to operate continuously and that the results of this testing be made available for public inspection as soon as analysis is complete.
- j) Licence Condition number 3.14.3 should require a record of disposal of any and all such disposals.
- k) Licence Condition number 3.18.1 should require a comprehensive record of quantities and of types of material received and dispatched.
- l) The Licence does not require that the result of monitoring should be checked regularly at laboratory. This independent cross-checking should be inserted.
- m) How is Licence Condition number 5.3 to be accurately monitored ? Will the Authority require weekly monitoring of cows milk within a specific radius of the plant? Without this, the Licence should be withheld.
- n) Licence Condition number 6.4 does not contain any requirement for cross-checking or verification. This is a major omission upon which the Licence should not be granted.
- o) Licence Condition number 8.11 is particularly casual as there is no requirement for additional signage to signify the hazardous nature of this waste. This Condition treats a dangerous product in a manner similar to other non-hazardous wastes at the incinerator. This is most inappropriate and demonstrates the un-preparedness of this Country for incineration.
- p) Licence Condition number 8.14 demonstrates more than virtually any other condition the extremely casual approach of the Agency to the licensing of incineration processes. Given that approximately 5% of waste accepted at the incinerator will emerge as hazardous waste, and that this is the principal condition with the handling of such hazardous waste, no specific conditions are placed on its transport; on the specific destination of the waste and how such waste may be treated at its destination. This condition instructs that the destination should be suitably licensed, but why is there no further, detailed condition applying? Under the terms of this loose condition, there is any amount of room for unscrupulous operators to abuse the licensing regime. It again demonstrates the inability of the Agency to even construct appropriate licensing conditions in such a manner as to give maximum protection to residents and to our environment. The hazardous material emerging from the incinerator is among the most toxic known to humankind, yet it is treated in this condition as equivalent to a sack of household refuse. How can this be? Why is the Agency taking such a casual approach to the incineration industry? This entire incineration process must be halted, at least until such appropriate body is put in place as to adequately oversee the licensing regime.
- q) At Appeal stage, subsequent to planning permission having been granted by Meath County Council, An Bord Pleanála ignored the recommendation of its own Inspector to uphold the objection. A similar situation occurred with the Agency reducing the effectiveness of conditions by requiring a less-strenuous monitoring of Dixon levels, particularly in cows milk in the vicinity of the incinerator. This clearly demonstrates yet again the sympathetic nature of the Agency towards the Licensee. Why is the Licensee's interest being treated as more important than that of the health of the local residents? What guidelines are being followed here? Why is this attitude being adopted all through these conditions?
- r) There is no specific requirement on the licensee to notify local residents of danger in the event of system failure at the incinerator. How could this omission have arisen? Surely, if a community is to be burdened with such a hazardous, dangerous system of waste disposal, the least they should have is an undertaking that, in the event of system failure – and experience on the continent demonstrates that failures occur with regular frequency at incinerators – immediate warning is given. This must be included in license condition.

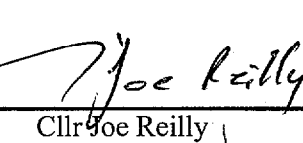
We, the above named appellants, ask that we be permitted the opportunity to present an oral hearing in this case and, accordingly, are enclosing fee as required for same.

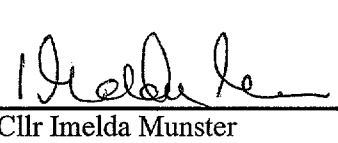
Trusting this request will be granted, we look forward with interest to discussing these matters further with you.

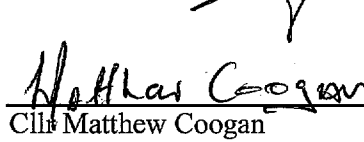
We enclose herewith a cheque in the sum of €200.00 (two hundred euro).

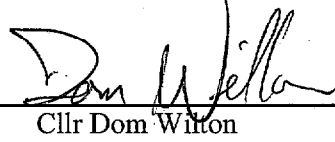
Sinne,

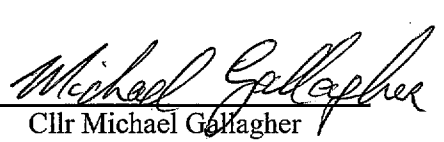

Arthur Morgan TD


Cllr Joe Reilly


Cllr Imelda Munster


Cllr Matthew Coogan


Cllr Dom Wilton


Cllr Michael Gallagher

For inspection purposes only.
Consent of copyright owner required for any other use.