

objection 11 167-1

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Comhairle Bhailecheannair na hUaimhe

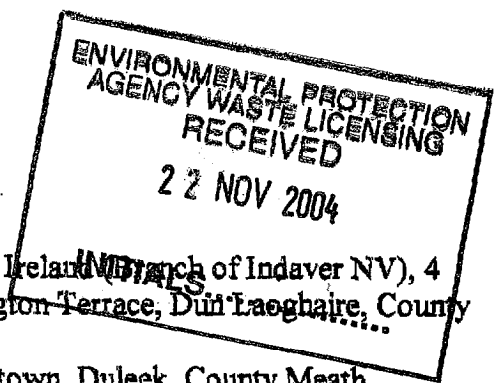
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Dr. Jonathan Derham, Authorised Person
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
County Wexford

19 November 2004

Waste Licence Register No. 167-1

Applicant: Indaver Ireland (Branch of Indaver NV), 4
Haddington Terrace, Dún Laoghaire, County
Dublin.
Facility: Carranstown, Duleek, County Meath.



Dear Sir,

I wish to appeal the decision made by the Environmental Protection Agency to grant a waste licence to the above named applicant. I also request an Oral Hearing. I enclose cheque for €253.95, i.e. €190.46 for this appeal and €63.49 for Oral Hearing request.

I wish to clarify I do not have a problem with the use of incinerators to dispose of the residual waste after the minimising, recycling and reuse of waste has been carried out, however I do have a serious problem with the siting of incinerators close to highly populated areas, especially where incinerators are sited down stream of these areas and when some of the most eminent health experts have stated that the long term health effects on the public, needs further research and further epidemiological study.

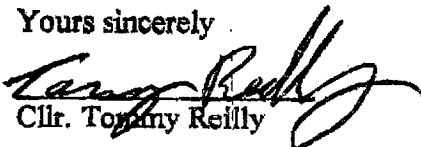
- 1) The proposed Incinerator if built as planned, will be just two miles south west of the highly populated town of Drogheda.
- 2) Drogheda's population is approx. 26,500 and is a rapidly growing. In is anticipated by 2030 Drogheda may be have become a city with a population of approx. 70,000.
- 3) The prevailing wind in this country is from the south-west and consequently the main dispersal of emission borne particulate from the 65 metre high stack, will be carried in the prevailing south-westerly winds from the proposed incinerator in Carranstown onto and into the homes, schools, workplaces and every other place for the residents of Drogheda. What a frightening prospect to burden an innocent people with an unknown health risk when there are other less questionable sites available on the east coast and away from such highly populated areas.
- 4) The Irish Cement factory employs almost 200 workers and is only half a mile away. The prevailing wind will carry dust and emissions from the incinerator stack into the working environment of these workers for the full duration of their working shift in Platin Works. The majority of Irish Cement workers will derive no benefit from this incinerator and get most of the negative side effects. Why should these workers in Irish Cement be unnecessarily exposed to possible long-term health risks!

Town Clerk - Fergus Muldoon • Cléireach an Bhaile • Feargus Ó Maoldúin

- 5) In Schedule B: Emission Limits on page 28 of the EPA's own Draft Licence the cocktail of emissions outlined is of serious concern. This does not take into account what complex emissions may arise from the incinerator of materials which are as yet still in the design stage. The collection as shown I respectfully suggest may only be a thumbnail sketch of what may eventually be coming out of the incinerator stack.
- 6) It is an indisputable fact that exposure of humans to heavy metals even in small doses for prolonged periods has serious health implications. It is also known that the body stores these small doses of heavy metals rather than excreting them so there is an accumulation over a long period in the body's main organs. It is also known that heavy metal especially cadmium destroys the body's enzymes and this has serious consequences for the body's normal level of functioning. Furthermore, in the event of a cell becoming damaged, the body's ability to repair and replicate the damaged cell structure is seriously impaired, thereby leading to premature cancer and death.
- 7) A Health Research Board report conducted by teams from UCD, TCD and DIT into 'Health & Environmental Effects of Land-filling and Incinerator of Waste' has stated 'At present, Ireland has insufficient resources to carry out adequate risk assessments for proposed waste management facilities. Although the necessary skills are available, neither the personnel nor the dedicated resources have been made available for this purpose. In addition there are serious data gaps in relation to the environmental effects of these technologies. These problems should be rectified urgently.'
- 8) The Health Research Board's Report further stated: Irish health information systems cannot support routine monitoring of the health of people living near waste sites. There is an urgent need to develop the skills and resources required to undertake health and environmental risk assessments in Ireland.
- 9) Dr. Dominique Crowley in presenting the Health Research Board's report went on to say; 'the lack of baseline data makes it very hard to interpret the result of local studies' etc and further states 'Irish facilities for measuring dioxins are required and should be developed as a priority'. A health baseline is not proposed for the public.
- 10) A few hundred yards from the proposed incinerator is Mount Hanover primary school and it begs the question 'why must we as responsible adults expose these young children to a 5 hours daily dosage of unknown long term health risks'.
- 11) The EPA's own executive Dr. Kelly in a letter has said 'the EPA has confirmed they didn't have the in-house medical expert or seek the advice of an outside expert before granting the draft waste licences for incinerators in Cork and in Meath'.
- 12) The village of Duleek is only two miles from Carronstown and with its population of 4,000 rising rapidly, will get their share of air borne particulate as well as the nightly noise pollution from generators, conveyors and ancillary machinery.
- 13) The residents of Drogheda and Duleek and nearby surrounding areas will have their properties devalued and will be exposed to a greater level of accidents from trucks.

I would welcome the opportunity to expand on my submission at an Oral Hearing.

Yours sincerely


Cllr. Tommy Reilly