

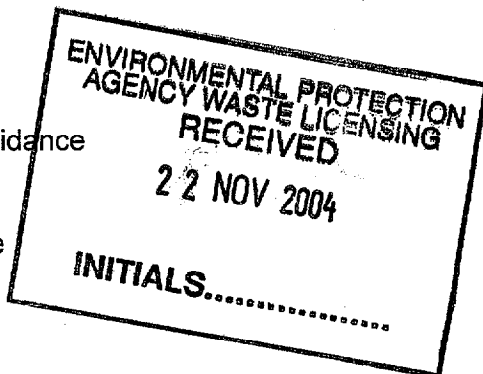
Councillors for the East Meath Area

One Stop Shop

Duleek

17th November 2004

Ms Eve O'Sullivan
Programme Officer
Office of Licensing & Guidance
EPA
PO Box 3000
Johnstown Castle Estate
County Wexford



Dear Ms O'Sullivan

RE:- PROPOSED WASTE LICENCE – REF 167 – 1 - INDAVER IRELAND - INCINERATOR
– CARRANSTOWN, DULEEK, CO MEATH – 26.10.2004

Please find below our submission in respect of the above proposed licence grant. Please also find attached a cheque for the sum of €190.46 in respect of this submission.

The Stack Height – we have serious concern about your recommendation to have the stack height increased by 25 metres, from 40 to 65. This highlights your concern regarding the dispersal of the many pollutants emitted. We also feel that this stack height will impair the protected view in which it sits, and may also be visible from the UNESCO World Heritage site of Brú na Boinne. Our concern is also raised regarding the capabilities of the Applicant. Should they not have been aware of the adequate height required for dispersal of their pollutants? If they are capable of such gross errors in judgement, we fear for other areas of negligence in this highly technical, and potentially highly dangerous facility.

Health Issues - We understand that the community, backed by the Local GP's, the Irish Doctor's Environmental Association, the Health Review Board and many medics abroad have raised some serious questions with regard to the health effects of the plethora of pollutants which incinerators emit. The residual ash, if landfilled, will eventually find it's way into the watercourse, as no liner lasts indefinitely. The boiler and flu ash is a hazardous waste, which needs to be cased in concrete and landfilled in a hazardous waste landfill, which Ireland doesn't have. We therefore worry that by allowing this incinerator into our midst, we are creating the necessity for hazardous waste landfill out of inert municipal waste. If so, where will the hazardous waste landfill be sited?

We are aware that An Bord Pleanala and the EPA are prevented from taking health issues into account, and we would like to register our strong objection to this unreasonable restriction.

Water Issue - The site at Carranstown is classified as a regionally important aquifer and according to the G.S.I. map of the area there is high to extreme vulnerability with regard to pollutant risk. The EPA's Inspector Peter Carey in his report (page 9) agrees with this classification. The E.I.S. document for Indaver's Carranstown incinerator contained a tabulated page of WHO guidelines for choosing a site for a potentially polluting plant/project. The guidelines recommended the rejection of 'areas of regionally important aquifers' and 'areas of major aquifer recharge'. These guidelines, quoted by Indaver have been completely ignored.

Site Selection - We now understand that the site selection criteria for this location was flawed, as attested by the An Bord Pleanala Inspector that officiated over the Oral Hearing. This is the bedrock upon which the incinerator decision is built, if this is flawed, then the whole development is flawed. The limestone substrate, over a regionally significant aquifer, adjoining a quarry, which blasts every day, with a main gas line running through it. We find this combination to be a dangerous recipe for disaster, regardless of whether seismic foundations and vibration isolated monitoring equipment are specified in your licence.

Waste Crisis - This alleged crisis with regard to what to do with the waste was addressed in our initial submission, i.e. let's not create as much of it as we currently do, let's push back on industry and ensure that recycling / re-use / composting options have been set up for a high proportion of the waste stream. We fully acknowledge at the moment that this will take some time to set up, and in the interim, we need to do something with our waste. Over the past 12 months, the Knockarlie site has been licenced by the EPA and An Bord Pleanala to go into operation. This site is less than 10 miles away from the Carranstown site, also in a rural area of County Meath. We therefore consider the waste crisis in this area to be averted, and the siting of a second huge facility in such close proximity to Knockarlie would be in contravention of the legal point of 'equity' – i.e. what's fair for one community to bear. This equity issue would also be trans-generational, on account of the licence grant for an incinerator, with an average life span of 25-30 years means that the next generation will not only have to cope with a polluting facility in it's midst, but also the heavy-metal and dioxin laden by-products of this operation.

We urge you to re-think your proposed grant of a licence for this facility.

Yours faithfully

Cllr Pat Boshell
Cllr Jimmy Cudden, *Cathaoirleach*
Cllr Ann-Dillon Gallagher
Cllr Dominic Hannigan
Cllr Tom Kelly