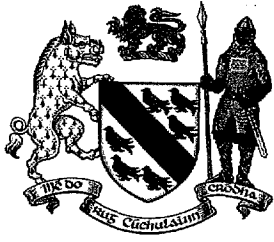


COMHAIRLE BHAILE DÚN DEALGAN
DUNDALK TOWN COUNCIL

167-1

obj (14)



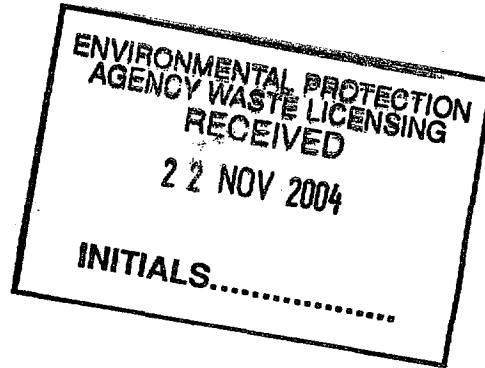
Address all communications to Town Clerk

Phone: (042) 9332276
Fax: (042) 9336761
E-mail: info@dundalktown.ie

TOWN HALL,
CROWE STREET,
DUNDALK.

Our Ref :

Your Ref :



19 November 2004

Environmental Protection Agency
P. O. Box 3000
Johnstown Castle Estate
Co. Wexford

Re: Waste Licence Application Register Number 167 -1
Applicant: Indaver Ireland
Location of Facility: Carranstown, Duleek, Co. Meath.

Dear Sir/Madam

I enclose details of an Objection on behalf of Dundalk Town Council, Town Hall, Crowe Street, Dundalk, to the above Application. The subject matter and grounds for the objection are as set out on the attached Schedule.

I also enclose the required fee of €190.46.

Yours faithfully

Kieran Lawless
Administrative Officer

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Dundalk Town Council are formally objecting to the proposed licence decision ref. 167-1 by the Environmental Protection Agency, to grant Indaver Ireland permission to develop waste incineration with energy recovery at Carronstown, Co. Meath on the following grounds:

1. The granting of a licence goes against the express wishes of a huge body of public opinion in Louth and Meath. 25,000 people in Drogheda and East Meath signed a petition against this development. Meath County Council received 5,500 written objections and 5 years ago when Dundalk was being mooted as a possible site 22,000 people signed a petition against.
2. Carronstown, Co. Meath is not identified in the 1999 –2004 Waste Management Plan as a possible location for this development.
3. In proposing to license this facility the EPA is encouraging investment at the bottom end of the waste hierarchy (incineration/landfill) when the top end is in serious need of investment (reuse/recycle).
4. The proposed licensing by the EPA is happening during the review of the NE Waste Management Plan possibly prejudicing the outcome of that review. The announcement ought to have been delayed until the Review Group has completed their deliberations. If at that stage incineration is adopted as policy then consideration should be given to licensing.
5. Incineration does not get rid of the waste. It reduces it in volume by 2/3s but that ash in turn needs to be land filled and is less chemically stable than the original waste.
6. The licence urges the licensee to seek opportunities for recycling the “non – hazardous” ash, presumably into road building and breezeblocks. This stores up problems for the future for those working with the resultant materials including staff of this local authority and most particularly during demolition works and road lifting where such materials have been employed. The ash incorporated into the building material will still contain heavy metals.
7. 3% of the waste, i.e. 4.5 tonnes of fly ash is hazardous and needs to be disposed of in a landfill designed to deal with it. Such a site is not specified in the licence document.
8. Monitoring of milk, sewer emissions, emissions to water are not scheduled in the licence. Should there be increases in dioxin levels in the food chain they will go undetected.
9. Monitoring of bottom ash and boiler ash is to take place on a quarterly basis only. Monitoring of the highly toxic flue ash is required only on a twice-yearly basis. Potential problems could therefore go undetected for up to 90 days with the former and 180 days with the latter.
10. Furthermore the EPA is seeking only 63,513 euro per year for auditing inspecting sampling and analysing activities on the site. In light of the cost of a full spectrum analysis estimated by the WHO at up to 10,000 dollars per test questions need to be asked about the adequacy of the testing regime.
11. There is no indication in the licence that penalties for emission breaches will be sufficient to discourage potential poor practice or taking of shortcuts.
12. The proposed decision appears to be in violation of Ireland’s commitments to the Stockholm Convention on Persistent Organic Pollutants as outlined in the preamble to the convention quoted below.

STOCKHOLM CONVENTION ON PERSISTENT ORGANIC POLLUTANTS (Pops)

The Stockholm Convention is a global treaty to protect human health and the environment from persistent organic pollutants (Pops). Pops are chemicals that remain intact in the environment for long periods, become widely distributed geographically, accumulate in the fatty tissue of living organisms and are toxic to humans and wildlife. Pops circulate globally and can cause damage wherever they travel. In implementing the Convention, Governments will take measures to eliminate or reduce the release of Pops into the environment.

13. The EPA in its founding charter has sustainability criteria built into its assessment process. The burning of potential resources as a way of reducing them to more manageable volumes while at the same time creating 3.6million cubic meters of smoke daily or 151,000 cubic meters per hour and several tonnes of highly toxic fly ash annually is clearly a non sustainable practise and is not consistent with the EPA's sustainability commitments.
14. The licence permits .1 nanogram/100picograms of dioxin to be contained in each cubic meter of smoke stack emission. The W.H.O. state (Fact Sheet 225, June 1999) that a toxic dose of dioxin is 4pg per 1 kg of body weight. This Council contends that there is a very real possibility of toxic levels of dioxin building up in people and animals at the top end of the food chain where storage in body fat is persistent.
15. There is no evidence in the licensing, of the polluter pays principle, in terms of Co2 credits or clean up costs in the event that monitoring detects breaches in licensed emissions.