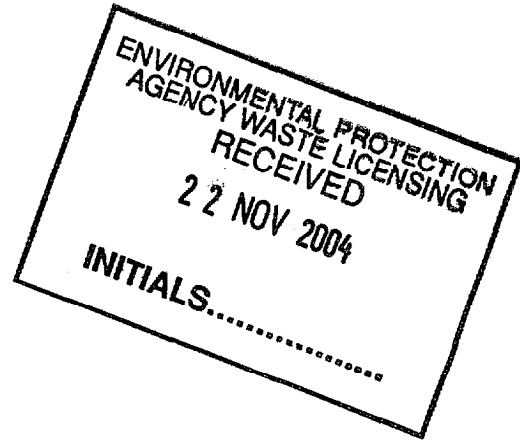


Obj 17 167-1

EPA APPEAL.  
To Waste Licence 167-1  
Applicant: Indaver Ireland  
Location: Carranstown, Duleek, County Meath.



From LPAI,  
Louth People against Incineration.  
Túr na Gaoithe  
HBX  
Dundalk  
County Louth

Date 18/11/2004.

Dear Sir / Madam,

The LPAI (Louth People against Incineration) object to the issuing of a waste licence to Indaver Ireland (branch of Indaver NV) for its thermal treatment / energy recovery/ incinerator plant at Carranstown, County Meath.

Furthermore we call for an oral hearing to discuss these issues in further detail.

The EPA's own terms of reference are grounds for refusal.

See "**Environmental Protection Act, 1992 section 52 sub section 2.**" Five clauses of this act are highlighted.

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Who are the relevant public authorities?

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- The European Union advocate recycling and composting as the preferential choice for waste management over Incineration.

**(b) The agency shall have regard to the need to for high standards of environmental protection and the need to promote sustainable and environmentally sound development, processes or operations.**

- It goes without saying that the burning of materials derived from finite resources is simply not sustainable. The world's oil and gas resources, which are the basis of plastics, will gradually become more and more expensive as these resources are exhausted.
- High standards of environmental protection will not be protected if the various pollutants that emit from incinerator stacks are allowed into the environment in Meath and Louth.

**(c) The Agency shall have regard to the need for precaution in relation to the potentially harmful effects of emissions where such emissions could cause significant environmental pollution.**

**DIOXINS.**

- The world health organisation have now reduced the recommended bodily intake of Dioxins to be below 4 picograms per Kg body weight /day.
- We know that this poison is very chemically stable and therefore remains in the general environment for many hundreds of years.
- We also know that this toxin bio accumulates in the fatty tissue of animals in the food chain.
- We know also that it interferes with the normal function of the endocrine glands that dictates the proper development of the unborn baby.
- We know that the unborn foetus in its mother's womb, being at the top of the food chain, is the most likely victim of Dioxins.
- We can say therefore, assuming a weight of 1 kg for such a baby, that 4 picograms represents a single toxic dose.

**How can we decide if the Incinerator emissions can cause significant environmental pollution?**

The proposed EPA licence allows Indaver to discharge a maximum concentration of 0.1 ng of dioxins per m<sup>3</sup> in its emissions.

This is in fact 100 pg of dioxins per m<sup>3</sup>.

This amounts to 25 toxic doses per m<sup>3</sup>, as far as the most vulnerable group in our society, the unborn foetus, are concerned. It should be noted that as an endocrine disruptor, dioxins damage people that are most dependent on the proper functioning of the endocrine glands.

**How many toxic doses, in total, per day is legally being allowed into the environment by the EPA?**

The EPA is allowing a maximum volume of emissions to be not more than 151,000 m<sup>3</sup> per hour.

Over 24 hours this amounts to 3,624,000 m<sup>3</sup> per day.

Therefore at 25 toxic doses per m<sup>3</sup> at 3,624,000 m<sup>3</sup> per day, amounts to a legal permission to release 90,600,000 toxic doses per day.

To put it plainly the EPA who have done so much to date to highlight the dangers of open back yard burning is now allowing enough dioxins into the environment to exceed the WHO daily recommended dose, to the unborn, by 90,600,000 times.

**FINE DUST AND HEAVY METALS.**

Apart from Dioxins, the dust and fine articles emitted from the stack pose a significant public health threat. At emission limits of 181 grams per day for Mercury or Cadmium, people in the immediate area will be inhaling very high concentrations of particulate matter laced with these toxins. With asthma levels already very high in Ireland the additional burden of inhaling tiny toxic particles such as heavy metals must be avoided.

**There is little doubt therefore that the EPA proposed decision will allow emissions that will cause "significant environmental pollution". As the Environmental protection act of 1992 prohibits the EPA from allowing this application proceed on these grounds, it should be rejected.**

**(d) The Agency (EPA) is also required to enforce “the polluter pays principle”.**

- The state failed to have the clean up costs met for the Haulbowline steel plant in Cork.
- The EPA has failed to apply strict conditions to its licence at Aughinish Alumina in Limerick.
- The EPA has failed to identify the cause of the health problems in the Askeaton area.
- It failed to carry out adequate environmental monitoring so that the cause of the health problems could be identified.
- The failure by the agency in the past to impose tight conditions in its licences as well as its failure to carry out adequate monitoring, indicates that the polluter pays principle will not be properly or reliably implemented in the Indaver case either.

**(e) The Agency shall ensure that a proper balance is achieved between the need to protect the environment and the need for infrastructural, economic and social progress and development.**

The EPA’s judgement on the type of *infrastructure* required should be influenced by the need to firstly achieve Reduce, Reuse and Recycling targets. The EPA should not find itself caught in the position of having to approve the least environmentally friendly and sustainable option simply because the Government has failed to spend money over the past 5 years on a recycling facility in Drogheda or in the North East generally.

Rather than leaving people with inadequate recycling facilities, *social progress* is better achieved by providing well- managed recycling *infrastructure* in every major village and town in the North East Region, with facilities for at least 45 different categories for recycling, such as V& W in Dundalk. This more than advertising, will encourage a culture change towards recycling and sustainable resource management.

*Social progress* will be achieved when Government, Industry and Local communities all work together take their fair share of responsibility for the elimination of waste from society. Government overruling local democracy and dictating to local councillors, that 39% of the waste must be incinerated, will not achieve social progress.

*Economic Progress* will advance when we start to think about sustainable management of our finite resources. More jobs will be created by reusing, recycling and re-manufacturing within the Irish economy, rather than by burning or destroying these materials forever. The US EPA has estimated that there are 10 times more jobs in resource recovery and recycling than in burying and burning. The Province of Nova Scotia in Canada has already generated thousands of jobs in recycling, since turning away from incineration and mixed landfill.

In fact the videos enclosed in our submission show that: public health, the environment, jobs, enterprises and sustainable resource management are all elements of *economic and social progress* when societies turn towards Zero Waste.

The *cost of such protection* of the environment, by implementing Zero Waste policies, is in our view small in comparison to the long- term public health benefits and sustainable economic opportunities.

**Conclusion.**

The parameters as outlined in (a),(b),(c),(d) and (e) above, offer convincing grounds for the rejection of the Indaver application.

We should point out that the policy of Zero Waste offers significant public health, environmental protection, economic opportunities as well as jobs in contrast to the disadvantages and hazards associated with incineration.

We further include copies of:

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Yours Sincerely  Mr Ollan Herr. (042) 9377689.

of  
Louth People Against Incineration.  
and Louth Zero Waste.



# State fails in effort to have plant's clean-up costs met

MARY CAROLAN

The High Court has dismissed an attempt by the State to have the liquidator of Irish Ispat (formerly Irish Steel) meet the estimated €30 million costs of making environmentally safe the company's former site at Haulbowline Island, Co Cork.

Ms Justice Carroll yesterday granted an application by the liquidator, Mr Ray Jackson, to be allowed to disclaim an Environmental Protection Agency licence requiring certain environmental safety conditions to be observed at the company's site.

The cost of rehabilitating the site, where hazardous waste and radioactive scrap materials had been identified, had been estimated at €30 million in a report which was commissioned by the State.

In an affidavit, one of the authors had said that unless the recommendations of the report were implemented, there was a serious risk that environmental pollution would occur in the future.

The EPA also attributed some €15.9 million of the rehabilitation costs to the company.

Mr Jackson had argued that it would be unfair to the creditors if they were to suffer the burden of the cost of undertaking this work. It was not his lawful function to apply the realised assets of the company for that purpose, he said.

In related proceedings brought by the State against Irish Ispat and Mr Jackson, the State sought orders under the Waste Management Act 1996 requiring the respondent to continue the holding, recovery or disposal of waste on the lands at Haulbowline within a specified time and to carry out certain rehabilitative works within a specified time.

The State also sought orders requiring the putting in place of an effective and ongoing monitoring, examination and inspection system for the site to prevent future occurrence of environmental pollution.

Both sets of proceedings were



The former Irish Ispat plant at Haulbowline, Co Cork, previously the State-owned Irish Steel.

heard by Ms Justice Carroll who in a reserved judgment yesterday granted the liquidator's application and dismissed the State's proceedings. She adjourned her decision on costs to October.

Irish Ispat Ltd was formerly the State-owned Irish Steel. The State had operated the premises from 1937 to 1996 when the

premises were leased to a new owner, Ispat Mexicana, the parent company of Irish Ispat. The State resumed possession in June 2003 after the liquidator operated a break clause in a lease.

The EPA licence was applied for in April 1999 and was granted on June 22nd, 2001, to Irish Ispat. Six days later a resolution sup-

porting the appointment of Mr Jackson as liquidator was passed by members and creditors of the company.

All the radioactive waste on the lands at Haulbowline has been moved to Rocky Island, the court was told last year.

Yesterday, granting the liquidator's application, the judge said the EPA licence was granted after the company had ceased production of steel. Before the licence was granted, the production of steel had been permitted under the EPA Act 1992 and was not subject to any conditions. The conditions in the licence could not be applied retrospectively.

The judge said the liquidator had finished off work in process, but this was an associated part of the smelting and production of steel which took place before the granting of the licence, which was not subject to any conditions.

It was also a factor that the amount of waste attributable to the work undertaken by the liquidator must be infinitesimal in relation to the general pollution caused over the 50-60-year period when the company was owned by the State up to 1996 after which it was taken over by a foreign shareholder.

The judge said the polluter-pays principle set out under an EU directive could not be achieved in this case. The obligations under the directive referred to ensuring the installations "are operated" in a particular way and did not refer to past operations.

The licence was granted after the company had ceased to carry on business so the company never did what was authorised by the licence. The company had no assets and those which were available for distribution were impressed with the trust for the creditors.

For those reasons, she would not direct that the liquidator expend money, which was available for distribution among the creditors, in mitigating or remedying pollution on Haulbowline.

She added that it was "not clear to me why the EPA had issued the licence in circumstances where it would never be operated".

## Dismay at State's failure to win case



Irish Times 2 November 2002

# Farmers welcome new report on deaths of animals

By Gordon Deegan,  
in Limerick

THE author of an independent report commissioned by the Irish Farmers' Association into unexplained animal deaths in the Askeaton area of Co Limerick in the early 1990s has said that industrial pollution could not be ruled out as a cause.

However Prof Brian Alloway conceded at the launch of the report in Limerick yesterday that "we are no closer to finding out the actual cause of the animals' deaths".

One of the farmers worst affected told the launch a small number of his stock were now showing the same symptoms that killed large numbers of his cattle in the early 1990s.

Askeaton farmer Mr Eiam Somers, who has lost 96 cattle over a 10-year period, said yesterday "I have come across four animals on my farm in the last two weeks with lumps on their hides about inch and a half square and they are very similar to what went on before". Mr Somers was one of a number of Askeaton farmers present yesterday who claimed that they were now "vindicated" by the Alloway review.

Prof Alloway was commissioned by the IFA to review an inter-agency report published by the Environmental Protection Agency (EPA) last year which ruled out industrial pollution as the cause of the deaths which occurred on 27 farms in Askeaton in the early 1990s.

Instead the EPA pointed the finger in part at farming practices causing families in the Askeaton area to label the report a "white wash".

Yesterday IFA president Mr John Dillon claimed that the Alloway review "has identified a series of serious omissions and failures in scientific monitoring and analysis by the EPA and others into the animal health problems in

the Askeaton area".

Mr Dillon said the review identified failures by the EPA to include pollutants in the environmental monitoring of the area and stated that there was insufficient reliable evidence to reach the main conclusions arrived at in the EPA report that industrial pollution did not cause the animal health problems.

In the report Prof Alloway said that Askeaton had been exposed to relatively low but significant amounts of atmospheric pollution from ESB plants and industries established in the area, adding that "the full extent of the pollution is not yet known because some important pollutants were omitted from the monitoring".

He described the Askeaton situation as "a serious problem and not yet understood, but it probably has several possible causes which are interacting".

Barmer and member of the Askeaton Ballysteen Animal Health Committee, Cllr David Naughton (EG) said: "The pity about it is that €53 million in taxpayers' money has been spent on various reports and Liam Somers is back in the same situation this week as he was in 1991 and 1992.

The pollution that is there may not be major pollution, but it has upset a very delicate balance in the area and it has to be recognised and to be addressed.

A spokesman for the nearby Aughinish Alumina Ltd said yesterday: "As far as the company is concerned, the issue was dealt with very comprehensively by the Government's official investigation led by the EPA that found that industrial pollution had nothing to do with the animal health problems in Askeaton."

The spokesman said that the company gave its full co-operation to that investigation and he declined to comment on the Alloway review findings.

Mr Dillon called for further monitoring of environmental quality in the Askeaton area.

# EPA eases licence terms for Co Limerick plant

GORDON DEEGAN

The Environmental Protection Agency (EPA) has eased the terms of a new licence for the huge Aughinish Alumina plant, allowing the company to avoid further major capital investment aimed at reducing emissions at the plant.

The EPA yesterday issued an Integrated Control Pollution (ICP) licence for Aughinish, the largest industrial plant in the State, at Askeaton, Co Limerick.

Green Party leader Mr Trevor Sargent expressed "grave disappoint-

ment" yesterday with the decision.

In the draft licence, issued last September, the EPA had stipulated that in order to get a new licence, the company must further reduce the plant's nitrogen dioxide emissions, which give rise to acid rain.

However, Aughinish objected to the condition.

The plant's environmental co-ordinator, Mr Liam Fleming, claimed that major capital investment would be required, and complained that the condition was "excessively onerous on Aughinish Alumina at this time".

He said the imminent arrival of Combined Heat Power (CHP) at the plant would "render the boilers partially redundant" and reduce [nitrogen dioxide] emissions significantly.

The company is contracted to have the €100 million CHP plant, which is expected to provide significant environmental benefits, operational by the end of next year.

Now, in response to the Aughinish objection, the EPA has said the emissions levels stipulated in the plant's previous ICP licence can remain in place.

It is the second time that Aughinish

has been successful in easing the terms of its licence. When the EPA granted the original draft licence for the plant in 1997, amidst a storm of protest from local and environmental groups, the company successfully objected to demands by the agency to reduce sulphur dioxide emissions, claiming the firm's survival was threatened.

In yesterday's decision, Aughinish was successful in four of its eight objections against the conditions of its licence, while the EPA has stated that the company's programme of meetings with the local community is adequate.

However, the agency stood firm in its demand that alumina dust emissions at the plant be cut. Aughinish had requested that the proposed reduction be deferred until 2005.

An Aughinish spokesman yesterday declined to comment on the EPA decision.

Mr Sargent said: "The EPA should have insisted to the last letter the conditions that were included in the draft licence, and I am disappointed that they didn't stand their ground in the final licence that has been issued. It shows for me a weakness on the part of the EPA."

RISH TIMES  
24/11/2004

Obj (17) 167-1

Payment for objection &  
request for oral hearing  
regarding Indaver, Cobranstown  
co meath, incinerator application  
Ref 167-1

From Louth People against  
incineration

Alan Heer (042) 93 77689

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ENVIRONMENTAL PROTECTION  
AGENCY WASTE LICENSING  
RECEIVED  
22 NOV 2004  
INITIALS.....



## EPA APPEAL.

To Waste Licence 167-1

Applicant: Indaver Ireland

Location: Carranstown, Duleek, County Meath.

From LPAI,

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Túr na Gaoithe

HBX

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PS. Original of this submission will be with you in Wexford on Monday. 22/11/2004 along with the additional CDs + DVDs.  
Regards  
Ellen Horz

4 pages  
By  
FAX

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Yours Sincerely



Mr Ollan Herr. (042) 9377689.

of

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and Louth Zero Waste.

# CD Placeholder

This page denotes that Six CDs entitled 'BBC Documentary on the Hazards of Dioxins', Nova Scotia, Canada Zero Waste Policy', Louth Zero Waste – series of short films', Canberra Australia who coined the phrase Zero Waste', New Zealand rejected incineration', Interviews with delegates to Zero Waste' were submitted as part of this third party objection.

The CD is held by the EPA at

Licensing Unit,  
OLG,  
EPA,  
P.O. Box 3000  
Johnstown Castle Estate,  
Wexford.