

**Carranstown  
Residents  
Group**

C/o Michael Lanigan,  
Carranstown,  
Duleek  
Co Meath



18 November, 2004

Waste Licensing Division.  
Environmental Protection Agency Headquarters.  
Johnstown Castle,  
Wexford,  
Co Wexford.

Ref: Indaver 167-1

**Re; Objection to the proposed decision on the granting of a waste management license to Indaver Ireland (Carranstown) Waste Management Facility at Carranstown, Duleek. Co Meath**

Dear Sir

We, the **Carranstown Residents Group**, represent 46 households (105 adults and 29 children) living within 2000 meters of the proposed Indaver Ireland development. Eight Carranstown households (21 adults and 3 children) live 500 meters from the centre of the proposed development. Of our 46 Carranstown families, 32 families have been resident in Carranstown for more than 20 years.

As members of the Carranstown Residents Group, we object to the issuing of a waste management license to the Indaver Ireland (Carranstown) Waste Management facility at Carranstown, Duleek Co Meath.

We also seek an oral hearing so that our heartfelt concerns can be voiced in a public forum.

Our objections are as follows

**Condition 1.4**

The maximum tonnage stipulation is too vague. The catchment area from which waste can be accepted is not defined. Is this facility to process Dublin's waste?

The proposed tonnage will generate at least an extra 7500 truck journeys on our already congested road. This extra danger, congestion, noise and pollution is not wanted in Carranstown

**Condition 2.3.2.5**

The responsibility and authority for initiating further investigation and corrective action in the event of non-conformity must lie with a competent independent body other than the licensee.

**Condition 3.2.3**

In the event of abnormal operating conditions, the incineration plant operations should be shut down immediately. "As soon as practicable" as judged by the licensee is not acceptable to the Carranstown Residents.

For inspection only. No other use.

We believe this decision should rest with a competent independent body with representatives on site at Carranstown.

Condition 4.1.1

Average half hourly and daily values are a nonsense concept. We believe that continuous monitoring should yield continuous results where peaks or spikes in emissions are evident, not disguised by averaging.

Condition 6.6

How accurate can a representative sample be when waste streams are so variable in source and nature? Sampling is not sufficient. We feel each load must be examined minutely to eliminate the risk of hazardous waste being surreptitiously discarded.

Condition 6.8

Monitoring equipment must be checked more than once annually. A competent independent body must check this monthly. Surveillance tests must be unannounced.

Condition 6.9

Continuous monitoring equipment must be maintained in working order and repaired or replaced immediately. "As soon as practicable" is too long to wait. Our health and our living environment is continuously at risk.

Condition 8.3

How is waste, deemed unsuitable for processing, stored on site and transported off site? We do not want hazardous waste stockpiled and transported in our locality. How soon is "as soon as possible"?

Condition 8.14

Transport of waste off site will generate further traffic congestion, noise, pollution and health risk for our residents.

Condition 9.4.1

Where is the nearest appropriate facility for transferring waste in the event of a complete breakdown? Does such a facility exist in Ireland? What does "transferred directly" mean? Will there be stockpiling of waste at Carranstown?

Condition 11.1

Are residents notified in the event of an "incident"? How soon are those living in the vicinity of the facility to be made aware of an incident?

Based on the foregoing, we the Carranstown Residents Group strongly object to the proposed decision to issue a waste management license to Indaver Ireland (Carranstown) Waste Management Facility at Carranstown, Duleek, Co Meath.

We request an oral hearing of our views at the earliest possible date. We enclose the relevant fees of Euro 190.46 and Euro 63.49 in respect of the objection and oral hearing request respectively.

Yours faithfully

On behalf of The Carranstown Residents Group.