

**E P A ORAL HEARING RE PROPOSED INCINERATOR AT CARRONSTOWN.**

Submission / Observations , From Pat O Brien , No Incineration Alliance.  
Local Resident; Married, 5 children, 3 Ashtmatics.  
Living under shadow of cement factory chimney . Don't wish shadow to increase;

**1] Emissions:**

Incinerators are generally recognised as being one of the major emitters  
Of dioxin in the world.  
We know dioxins are cancer causing agents, why given the amount of cancer in this  
region already would anybody want to build or develop anything that would for definite  
Increase those levels of dioxin in the environment even further, and therefore increase the  
levels of people with cancer even beyond the high levels that already exist.  
No increase is welcome no matter what percentage, no more illness is acceptable,  
No more young deaths are needed, enough really is enough.  
I honestly believe the E.P.A, as a protection agency have a duty of care in this area,  
And must not abandon that duty by licensing an industry they know full well,  
Given the amount of evidence produced here this week, and in Cork recently,  
Will increase the levels of dioxin in this area and their for increase the levels of illness  
As well, as outlined above.

**2] Monitoring:**

As outlined by Dr Callaghan yesterday, it is not possible to monitor continuously the  
dioxin emission levels from this plant in real time.  
At best what we will get is a snap shot at the company's leisure, once or twice a month  
maybe, with the E.P.A, playing no real role in this whatsoever, as I understand it, other  
than Being a collector / receiver of the information for examination.

This inspires no confidence in this plant been safely monitored and regulated,  
At best it is self monitoring, with or no involvement from the EPA, at worst if the epa  
Licence this plant, they will be granting a licence to this company to kill members of the  
Local population, the only dispute will be how many , when and where.

**Waste:**

On day one John Ahern under questioning from myself admitted, the company would  
seek to get waste from other parts of the country, other than the north east region, it's  
supposed to be designed for, and that the plant size could and probably would grow  
substantially in size as a result, over time.

If this occurs which seems highly likely,, then we will also have to contend with a huge  
increase in the volume of heavy lorries travelling to and from site delivering waste and  
exporting hazardous ash to destinations unknown, at this time.  
This will have huge implications from traffic perspective alone, not to mention a serious  
deterioration in an already low air quality base.  
I can't help but wonder if the company still have insufficient tonnage will they seek to  
import waste from outside the country, as is usual with such plants elsewhere,  
It seems highly likely.

**Aquifer:**

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Whether you are for or against this proposal, most people would agree it seems total madness to build a toxic waste incinerator on top of an aquifer and potentially one of the largest supplies of top class drinking water in the country, especially at a time when this very valuable resource is becoming very scarce in this region, almost to crisis levels. Given the continuous ever increasing rise in population figures within this region. It seems highly likely this resource will have to be tapped into in the near future to supply an ever increasing demand,

What will be the outcome if this plant is allowed to go ahead, and there is a spillage that leaks into the water supply, how many lives will be affected, how many families will suffer, who will take responsibility, the company, the agency, the govt, who.

Nobody can guarantee it won't happen, it could, if this plant goes ahead, and the only way of being sure there will be accidents, is not to licence this plant now.

#### RISK:

Any risk that is avoidable is unacceptable, and as heard from both the company's experts Dr Callaghan, and Dr Portor, an awful lot of theory, assumption, is used to project the so called best results for this plant given perfect working conditions.

Alas we don't live in a perfect world, we live in a world full of accidents, machines break down, malfunction, we get human error factored in as well, and you find there is no perfect situation scenario, just a lot of hot air, full of theory, assumption, leading to a complete insignificant amount of confidence in either of the experts or their systems, which both admitted they have no expertise in the development or running of incinerators.

#### ACCIDENTS:

The company indeed, project the perfect image, the perfect incinerator management team, no accidents no errors, no failures, etc.

But in the world of incineration there is no such thing as perfection, as can be seen from the major accident in Antwerp Belgium, where their state of the art incinerator was in excess of 2000 times over the legal limits for dioxin limits for an extended period of time between 2 and 3 months,

During that period of time not one alarm system indicated anything was wrong, so the public were left completely at risk to that serious exposure all that time, to me that's incredible incompetence, at any level.

What would the scenario be here, if a similar thing happened, would it destroy farming, would it destroy the food chain, would it poison our water supply, would people have to be evacuated as in other parts of the world recently, how many people and their families would be affected, in what way and for how long, these to me are all serious questions and concerns and should be addressed, before this agency even consider providing a licence for this plant.

Another question that comes to mind is who will compensate all of the above, who is prepared to underwrite this unacceptable risk, will the company, will the EPA, agency, the body providing the licence, or will the dept of health or the govt, themselves, seen as they seem to be promoting this industry here in Ireland.

One thing I don't accept from the company is that no problems occurred in Antwerp as a result of this accident, that's a complete nonsense, you can't expose everything and everybody to an accident of that magnitude, for that period of time and have no problems, it all depends on time, what goes up, must come down, it's only a matter of where and how long it takes to re-emerge in the food chain, it also depends on who looks, where they look, and how interested they really are in finding anything or reporting it.

I believe in time the people of that region of the world will pay a heavy price for this accident, with the lives and well being of the people living there.  
You can't pump thousands of tons of a cancer causing agent out into the atmosphere for several months and not pay a huge price, its only a matter of time.

#### AREA:

One of the main facility's in this region and immediately down wind of this project is The Lourdes hospital, and within that the maternity unit,  
Given that young babies and indeed the unborn are considered the most at risk, why in the name of god would anybody or any institution allow a smoking time bomb just a few Kilometres down the road, and more importantly directly in line of oncoming plume.  
All of the mothers and there babies will be placed at a totally unacceptable risk.

#### CONCLUSION:

THIS area has enough heavy industry, enough illness, enough problems, without adding to them, and we certainly don't welcome anything or anybody that might add to them in any way shape or form.

When you talk about death related illnesses like cancer, and you talk about increased percentage levels of a component like dioxin, it seems crazy to me, who in there right mind would licence anything anywhere that would guarantee an increase in the levels of cancer in any region, as this proposal most definitely will.

It is my opinion that the agency has major responsibilities here, and must not licence anything that will cause increased levels of environmental pollution anywhere.

Nimby is a much overused word, it has many meanings, including the following;

Not in my back yard, not in minister's back yard, N.I.A.B.Y. means not in anybody's back yard, And of course

N.I.J.B.Y. means not in johns back yard, meaning of course john Ahearn of indaver who rightly indicated some time ago, he would not want to live beside this plant either.

I agree with all of the above, nobody wants an incinerator near them, nobody trusts them, And nobody should have them imposed on them, especially when there are many viable alternatives, to what is a destructive industry in every sense of the word,  
It destroys waste, it destroys resources, and it destroys lives.

#### Finally

I would have to state strongly I believe the EPA, as an agency is in gross violation Of European convention article 6, which relates to equality, fair play, and equal resources, legal and otherwise for everybody while events such as this are taking place.

Quiet obviously the community groups could not retain expensive legal assistance, Like the company Indaver, and in the absence of any legal aid or financial assistance from the agency or board, it follows quiet clearly that our rights were clearly contravened  
And that the agency failed in its duty to protect said rights under the human rights act 2003.

We rely on similar rights flowing from the principles of natural/ constitutional justice.