

Submission by Kinsale Environment Watch to EPA ORAL HEARING RE GRANTING OF DRAFT LICENCE FOR TOXIC WASTE INCINERATION AT RINGASKIDDY FEB. 05 CORK

A

Before adding to our previous written submission to the EPA, I would like to make the following preliminary points on behalf of Kinsale Environment Watch.

1. **Justice/Planning Stage:-** It is a great pity that our communities are now driven to contest the licensing phase of the Indaver application when, in justice and fairness, they undoubtedly won the argument at the planning stage, only to have that victory outrageously overturned. The crucial problems identified at the Bord Pleanala public hearing in 2003 remain unresolved and the matter is the subject of a forthcoming judicial review. We are still smarting from the board's decision to promote "government policy" rather than good planning policy and to overrule their own senior inspector's informed recommendation on 14 counts to refuse planning permission. Meanwhile, Indaver has been allowed to proceed regardless to the licensing stage. It appears that, likewise, the EPA, by granting the draft licence, is putting the protection of "government policy" ahead of their primary duty, i.e. the protection of the environment.
2. **Local Democracy Undermined:-** We have seen our County Development plan contravened and the vote of our County councillors on this issue disregarded. Now we have each paid 253.95 euro to come to this hearing to address our concerns and questions to the EPA only to find that they have not bothered to come to their own "hearing". We are instead in the ridiculous position of having to confine to one another our questions about serious environmental protection issues pertaining to this application. This is yet another example of the breathtaking arrogance and disregard that has been shown to the people of Cork at every stage of this application. If the decision to grant the full licence has not already been made (and we fear that it has) is this an information gathering exercise? If so we are doing the Agency's job for them. Either way, we are researching and providing information to them while being barred from getting any information or communication from them in return. This is not public consultation. It is public denigration.
3. **Level Playing Field:** We also feel that we are not on a level playing field in our fight against this application. We are rearing our families and doing our normal jobs, while also taking on the combined might of Government and a huge and powerful incinerator company determined to impose an unsustainable, waste perpetuating, dirty, dangerous and outdated technology

on us. We have paid for our expert witnesses, our lawyers, the costs of research and all our many other expenses out of our own pockets.

4. **Costs** : We would therefore like to make a claim for costs under article 6 of the European Convention on Human Rights.

B

We would like to add the following points to our earlier submission.

WORRIES CONCERNING ACCIDENTS, FIRE AND EXPLOSION IN A BUILT UP AREA

In his Report to his board following the 2003 Planning hearing, Senior Inspector Philip Jones made the following comment,

“There is not sufficient evidence before the board to satisfy it that the proposed development would not pose risks to public safety in the event of major accident hazard”. That should have stopped the licencing.

In their recent report, the Health Research Board noted: “Ireland presently has insufficient resources to carry out adequate risk assessments for proposed waste management facilities”. That statement alone should have been enough to stop the licencing of this facility.

The following are a few recent examples of accidents and emission control failures at incinerators elsewhere. We call on the Agency to imagine the effects on the local and wider environment and on harbour families if similar events happened in Ringaskiddy.

February 2001 A 2 year old “state of the art “ incinerator in Dundee, Scotland, was put out of action after suffering 2 fires in 2 years as well as 20 separate breaches of emission limits. Similar technology is proposed for the Cork plant.

. The following is a report from Scotland on Sunday, dated 17 Feb. 2002

Dundee PFI incinerator up in smoke

RECEIVERS are expected to be called in this week to Dundee’s high profile waste-to-energy plant in what will be the first failure of a public and private sector project in Scotland.

It is understood that the main stakeholders in the stricken £42m incinerator plant at

Baldovie were preparing this weekend to pull the plug on the project, which has never been fully operational since its launch two years ago.

The collapse of the Dundee Energy Recycling Ltd (DERL) incinerator will be a major embarrassment for Dundee City Council, an equity investor in the project, which had hailed it as pioneering solution to the city's energy requirements.

Key investors in DERL as well as representatives from Bank of Scotland and the Prudential, which provided loan finance for the joint venture, held a fraught meeting last week to determine the project's fate.

Sources in Dundee say construction group Balfour Beatty, a 20% shareholder in DERL, has become increasingly isolated from the rest of the investors because of its role in building the Baldovie plant.

Balfour Beatty was co-developer of the incinerator with Kvaerner but the British-Norwegian engineering group's involvement in the project cease when parts of the group were acquired by Australian investment group Macquarie in October 1999.

November 18 2004, The incinerator serving the city of Campana, Buenos Aires, Argentina, exploded and was completely destroyed.

The explosion at the incinerator kiln was so serious that one operator died in the blast and five firemen were injured by the massive fireball that followed. The huge black cloud of smoke could be seen drifting 25km away. A series of further explosions followed, and flames reached the highly flammable waste products and set them on fire.

The proposed plant at Ringaskiddy adjoins the Hammond Lane facility, which we understand is in a continual state of spontaneous combustion. It is also close to a number of Seveso Type ~~1~~ facilities. We fear a domino effect in the event of major fire or explosion, especially on the new Maritime College and its occupants. In view of the fact that Dr. Kenneth Guiser, having examined the toxic waste arisings in Ireland, said that in his opinion this toxic waste incinerator was unnecessary, we think that the risks are also unnecessary and therefore entirely unacceptable.

According to Dr. Jorge Santoro, an anti-incinerator activist from the city of Zárate, next to Campana "The explosion of the incinerator in Campana could have been prevented if the Intendant of that city, Mr. Jorge Varela, had paid attention to warnings, especially considering that there was a devastating fire in another industrial waste incinerator (of the company Ailenco, built by INVAP SE) which luckily didn't result in an explosion, in the city of Zarate, only 10 km away from Campana, earlier in the year. Unfortunately the authorities from Zarate, just like the ones from Campana, minimized the facts and didn't provide adequate information about risks."

2 January 2005-14 A fire at a hazardous waste incineration plant in El Dorado Arkansas required the evacuation of 1500 people.

WORRIES CONCERNING EMISSIONS AND THEIR EFFECT ON THE COMMUNITY

It is said that the incinerator that keeps within its emission limits has not been built. There are literally thousands of examples of abatement malfunction. I will mention the one most relevant to this application.

August 2003

An Indaver static kiln incinerator, 10 years old, had to shut down because of breaches of emissions limits from tests on July 24. Final tests reported dioxin emissions 1000 times the permitted limits. If they can do it there they can do it here too.

Our Fears for the Impact of Emissions on Environment and Health

Studies in Ireland are woefully deficient. So we shall mention the following 3 overseas studies

1. WORLD HEALTH ORGANISATION

ASSESSMENT OF THE HEALTH RISK OF DIOXINS: RE-EVALUATION OF THE TOLERABLE DAILY INTAKE (TDI)
WORLD HEALTH ORGANISATION CONSULTATION,
May 25-29 1998, Geneva, Switzerland

Human exposure to PCDDs, PCDFs, and PCBs may occur through background (environmental) exposure, and accidental and occupational contamination.

Over 90 percent of human background exposure is estimated to occur through the diet, with food from animal origin being the predominant source.

PCDD and PCDF contamination of food is primarily caused by deposition of emissions from various sources (e.g. **waste incineration**, production of chemicals) on farmland and waterbodies followed by bioaccumulation up terrestrial and aquatic foodchains

2. BELGIUM

DIOXIN AND FURAN INVENTORIES
National and Regional Emissions of PCDD/PCDF
Prepared by UNEP Chemicals
Geneva, Switzerland
May 1999

Incineration of domestic and hospital wastes are the main sources of PCDD/PCDF in Belgium, for which also the most reliable data are available. For most other sectors, there is a larger range of uncertainty of the estimates.

3. THE LANCET 2001; 357: 1660-69
RENAL FUNCTION, CYTOGENETIC MEASUREMENTS, AND SEXUAL DEVELOPMENT IN ADOLESCENTS IN RELATION TO ENVIRONMENTAL POLLUTANTS: A FEASIBILITY STUDY OF BIOMARKERS

Jan A Staessen, Tim Nawrot, Elly Den Hond, Lutgarde Thijs, Robert Fagard, Karel Hoppenbrouwers, Gudrun Koppen, Vera Nelen, Greet Schoeters, Dirk Vanderschueren, Etienne Van Hecke, Luc Verschaeve, Robert Vlietinck, Harry A Roels, for the Environment and Health Study Group*

Summary

Background

Human exposure to chemicals is normally monitored by measurement of environmental pollutants in external media. We investigated whether biomarkers in adolescents can show exposure to, and health effects of, common environmental pollutants.

Methods

We recruited 200 17-year-old adolescents (120 girls) from a rural control area and from two suburbs polluted by a lead smelter and two waste incinerators. We measured biomarkers of exposure and of effect in blood and urine samples, and obtained questionnaire data. School doctors measured testicular volume and staged sexual maturation.

Findings

Internal exposure was mostly within current standards. Concentrations of lead and cadmium in blood, PCBs (polychlorinated biphenyls) and dioxin-like compounds in serum samples, and metabolites of VOCs (volatile organic compounds) in urine were higher in one or both suburbs than in the control area. Children who lived near the waste incinerators matured sexually at an older age than others, and testicular volume was smaller in boys from the suburbs than in controls. Biomarkers of glomerular or tubular renal dysfunction in individuals were positively correlated with blood lead. Biomarkers of DNA damage were positively correlated with urinary metabolites of PAHs (polycyclic aromatic hydrocarbons) and VOCs.

Interpretation

Biomarkers can be used to detect environmental exposure to pollutants and measure their biological effects before overt disease develops. Our findings suggest that current environmental standards are insufficient to avoid measurable biological effects.

SUMMARY

Dr. Mary Kelly makes the point that uncontrolled waste burning produces more dioxin per kilo of waste burned than would incinerators. The point is not which type of burning creates the most dioxin. The choice is not between backyard burning and mass incineration. They are both to be avoided at all costs. We call on her to do what she can to remove incentives for such environmentally damaging activities instead of actively promoting the principle of burning. We appeal to the Agency to adopt the precautionary principle and put a moratorium on the granting of a licence to these incinerators.

We also call upon the EPA to take a more proactive role in promoting clean technologies and effective waste minimisation strategies rather than rushing to licence discredited and unsustainable burn technologies. We call upon the EPA to make sure that Ireland avoids the mistakes of other countries. When they built their incinerators they did not have the information that we have now. We will be able to take advantage of new sustainable 21st century solutions only if we avoid falling for the clever and ruthless PR and sales talk of incinerator companies.

Rosie Cargin, The Grove, Kinsale, for Kinsale Environment Watch 15 Feb 05

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