

CROSSABEG / KILLURIN LOCAL ENVIRONMENT ASSOCIATION

Proposed erection of an Anaerobic Digester on the banks of the River Slaney.

An application was lodged on April 1st 2005 with the EPA, Reg. No. 742 for a review and extension of the license to incorporate the use of an Anaerobic Digester.

The Crossabeg / Killurin Local Environment Association (CKLE) oppose this license application on the following grounds;

1. The Transport, Storage and Processing of animal waste on this site.

There is a risk to;

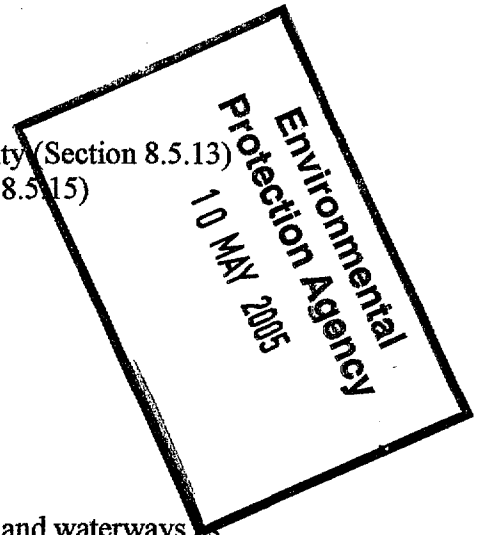
- Ground water contamination, on such porous shale sand subsoil's, as is characteristic of the area.
- The River Slaney, a salmonoid fresh water river, from surface water run off, which causes flooding in the area, and ground water contamination, which is contrary to WFD Directive 2000.
- The Proposed Special Area of Conservation (PSAC) which abuts the piggery.
- The Heritage area where an ancient Burial Urn was found on this site, and to the ancient Castle which is adjacent to the site.

2. Contrary to the following EU Directives Development Plan 2001.

- The River Slaney is designated water, under the European Communities (Quality of Salmon Waters) Regulations 1978 and one of few remaining spring salmon rivers in Ireland. The Council recognizes the fishing status of the Slaney and its tributaries and the contribution it can make to tourism.
- The river Slaney is a candidate for Special Area of Conservation, and has now been designated as a Site of Community Importance (SIC) and supports several species listed in the European Habitats Directive. As such the River Slaney is not only of national conservation significance, but has now been included in European legislation. (Section 5.11) Natural Heritage Area. (Section 8.3.1)
- River Slaney is designated an area of Vulnerable Landscape, which represents the County's highest quality scenic landscape, with limited potential to absorb intensive development, and need to be given the greatest possible protection. (Section 8.5.3)

Tel: 053 - 28410
Email: cklea@eircom.net

Kilpatrick Glebe Crossabeg Wexford

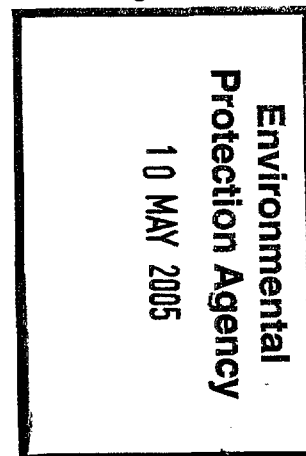


- River Slaney is designated as an area of High Amenity (Section 8.5.13)
Killurin Bridge is on a scenic Route No 9B (Section 8.5.15)
 - It is protected by;
 - Habitats Directive 1992
 - Wild Life Act 1976
 - Wild Life Amendment Act 2000
 - National Habitat Regulations 1997
 - It is the policy of Wexford Co. Council to protect inland waterways as resources for water based activities, including angling and cruising. (Section 6.3.5)
3. Killurin is one of the most scenic parts of Co. Wexford, an area of high amenity, which has seen an increase in population and development of the fishing, boating, rowing, and tourism, in recent times. Large numbers of young people aged from 10 to 35 meet for training with the rowing club 3 nights per week, at Killurin Pier which is situated directly opposite the proposed development.

Rural Development would be hindered by the placement of an Anaerobic Digester on the site due to the following;

- The vile obnoxious odors produced by the storage and processing of anaerobic organisms, including Mercaptans, and sulphides, Bearing in mind that the site is situated in a valley, on the bank of the River Slaney, and that the odours both from the adjoining Landfill site and the Piggery, tend to hang in the valley, and meander like a fog along the river, and inland to the surrounding area.
- These are a particular risk in the valley where 95% of houses are situated north of the site, in line with the prevailing winds.
- No prediction of Odour Emissions included.
- Constant noise from the digester and the electricity generator, which will resonate in the valley, and travel across water.
- Transport of waste into the site, and Digestate out of the site for spreading on farm land, with the subsequent damage to the roads, and the adjoining bridge, which is already in very poor repair. Please note that the major portion of the land bank for spreading is on the Killurin side, which will result in an increase of usage of the bridge to accommodate the slurry tankers.

- This will be detrimental to the Fauna of the highly sensitive area, and will be a triumph of monetary over ecological values
- 4. The inexperience of the applicants in managing such a facility, and their total disregard for the adjoining community, was obvious from reading the License Application, when the applicant proposes to operate on a 24 x 7 basis, and only proposes manual inspection of the facility 2-3 hours per normal working day, with the site being monitored electronically from head office.
- 5. This clearly illustrates the applicants inability to identify, and manage the hazards associated with operating such a facility, i.e.,
 - Explosion Risk,
 - Fire Risk,
 - Gas emission Risk,
 - Flooding Risk,
 - Environmental Damage Risk



- 6. The License Application we believe is deficient in a number of areas.

We propose to make a more detailed submission of our objections to the granting of a License for this facility, within the next 2 weeks.

Yours sincerely

For and behalf of the Crossabeg / Killurin Local Environment Association.

John Morris

Michael o Leary

Gerry Nash

[Handwritten signatures of John Morris, Michael o Leary, and Gerry Nash]

05.05.2005