

The Secretary,
The Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co Wexford.

Re: The planning application by Thornton's recycling, Killeen rd Dublin to construct a large composting facility at Kilbride, Milltownpass, Co Westmeath.

To whom it may concern,

I wish to object to the granting of a waste licence to the aforementioned recycling company for the following reasons :

Siting an industrial facility in a rural area.

The increased volume of articulated vehicles on our local roads and the consequences for the safety of our children who use these at present as a valuable amenity for walking and cycling.

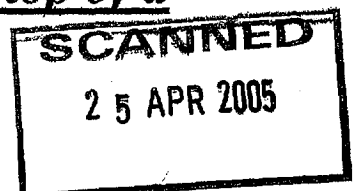
Vermin – rat, foxes, crows, seagulls, magpies, flies, badgers and other scavenger-type animals will be attracted to and multiply in such a facility, increasing the health risks to all humans, domestic, wild and farm animals in the area.

Sourcing of raw material – given that the company has told us that they will source hotel and restaurant waste from the Dublin area, knowing as I do that many of these food outlets purchase meat from suppliers who in turn source this outside the stringent controls of the E.U. (where Foot and Mouth ,T.B., Asian Fowl flu etc. are endemic).

Air quality – airborne aspergilli will irritate our lung tissue, especially in winter when our immune system is already trying to cope with the usual colds and flu.

Composting is the way of the future but I will not accept waste, produced outside the catchment area of Mullingar, to be processed at a site opposite my front door!

To site a large compost facility on top of a known aquifer is Genocide



Yours faithfully,

H Keogh

Tuan Mullin LA

13/2/05

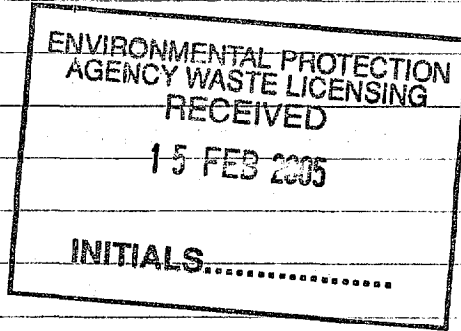
Martin Harris

120 Deaton Park

Mullingar

Co. Westmeath

8/2/05



The Secretary
environmental protection agency
box 3000
Johnstown Castle estate
County Westmeath.

Re, waste licence application by Thoentons Recycling Ltd for a Composting facility at Pass of Kilbride, Milltownpass, Co. Westmeath.

I wish to object to the granting of this licence for the following reasons;

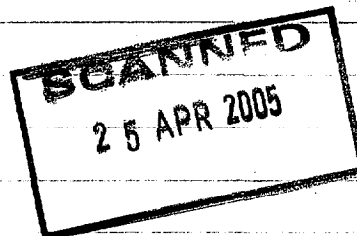
1 It could cause the pollution of air, surface water, water courses, and ground water in the area.

2 It could lead to an increase in Jerron, flies, and scavenger-birds.

3 Bio-aerosols could damage human and animal health.

4 The proposal is contrary to the Westmeath County Development plan.

Martin Harris



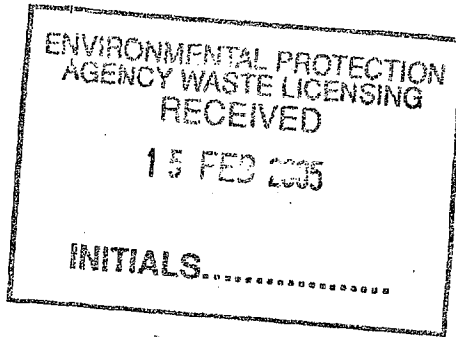
Martin Harris

120 Dalton Park

Mullingar

Co. Westmeath.

8/2/05



The Secretary
environmental protection agency
box 3000
Johnstown Castle estate
County Wexford.

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at Pass of Kilbeide, Milltownpass, Co. Westmeath.

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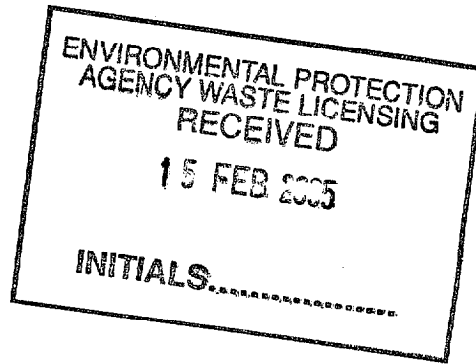
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ground water in the area.

2 It could lead to an increase in Dermis, flies, and scavenger-birds.

3 Bio-aerosols could damage human and animal health.

4 The proposal is contrary to the Westmeath County Development plan.

Martin Harris



Carlaon
..Milltownpass
..Co. Westmeath

The secretary,
Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Re: waste License application to Thorntons Recycling Ltd. for a Composting facility at Pass of Kilbride,
Milltownpass, Co. Westmeath.

Dear secretary,

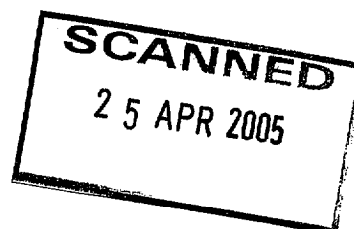
I wish to object to the proposed granting of this licence for the following reasons;

- The proposed facility will be in contravention of the **Midlands Waste Management Plan** and the **Westmeath County Development Plan**.
- The proposed facility could have a damaging effect on the **health** of the people in the local area and surrounding hinterlands, especially in the village of Milltownpass where recently there has been a new **Atheistic Unit** opened at the primary school by Minister Hannafin.
- Also the bio-aerosols released by this plant could cause serious damage to animals in the region, as this is an Equine and Bovine breeding area.
- This plant is proposed to be constructed on an underlying aquifer which in turn feeds all the local wells in the area and also into the **Kinnegad river** and its spawning grounds which is a tributary of the **Boyne river**.
- This proposed plant will also lead to an **increase in pollution**, such as vermin, flies, odours, noise and dust.
- The proposed Composting Plant could have a serious and damaging effect on the bordering **Milltownpass National Heritage Area**, by their proposal to upgrade the road which would in turn lead to lowering of the natural water table of the bogland.
- The majority of **raw material** for the proposed facility will be transported by lorry from the greater Dublin and Galway areas. This includes mainly waste from the hotel and catering industries. This procedure would be highly dangerous as it would include meat particles such as chicken and beef imported from South America, which is notorious for its outbreaks of **Foot and Mouth**.

Therefore I feel that this plant should be located in an industrial region or close to an already existing landfill and not in a rural and agricultural setting such as Pass of Kilbride in Milltownpass. I hope you take my fears and concerns into account and refuse a Waste Licence to Thorntons for this plant on the reasons I have mentioned above.

Yours sincerely,

Robert Walsh



ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

Johnstown
Gaybrook
J. Keeling

The secretary,
Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Oxford.

Re: waste License application to Thorntons Recycling Ltd. for a Composting facility at Pass of Kilbride,
Milltownpass, Co. Westmeath.

Dear secretary,

I wish to object to the proposed granting of this licence for the following reasons;

- The proposed facility will be in contravention of the **Midlands Waste Management Plan** and the **Westmeath County Development Plan**.
- The proposed facility could have a damaging effect on the **health** of the people in the local area and surrounding hinterlands, especially in the village of Milltownpass where recently there has been a new **Atheistic Unit** opened at the primary school by Minister Hannafin.
- Also the bio-aerosols released by this plant could cause serious damage to animals in the region, as this is an Equine and Bovine breeding area.
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Therefore I feel that this plant should be located in an industrial region or close to an already existing landfill and not in a rural and agricultural setting such as Pass of Kilbride in Milltownpass. I hope you take my fears and concerns into account and refuse a Waste Licence to Thorntons for this plant on the reasons I have mentioned above.

Yours sincerely, *Tom Cleary*

SCANNED
25 APR 2005

10/2/05

FRANK KELLY
FARTHINGSTOWN
ROCHFORDBRIDGE
WESTMEATH

The Secretary,
The Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

SCANNED
25 APR 2005

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

Re: The planning Application by Theantens
of Kileen Road in Dublin to build a
large Composting facility at Kilbride, Milltownpass
Co. Westmeath.

To whom it may Concern.

I would like to object to the proposed
granting of a waste licence, for the following
reasons.

- 1) The size of the industrial facility proposed
- 2) The volume of traffic,
- 3) spread of disease from rat fox Badgers
flies and the possible spread of Foot and
mouth.

yours Faithfully FRANK KELLY

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

Colvin
Streete,
Rathowen,
Co. Westmeath

The Secretary,
Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

9th FEB 05

SCAN
25 APR 2005

RE:- Application by Thornton's Recycling Ltd, Killoon Rd.
Dublin for a waste permit to operate a composting
facility at Pass of Killade, Mulltompas, Co. Westmeath.

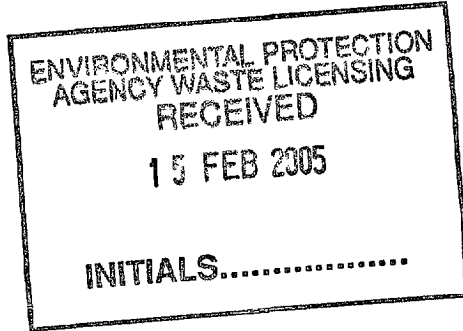
Consent of copyright owner required for any other use.
For inspection purposes only.

Dear Sir / Madam,

I object because the proposed site is:-

- A On top of aquifer.
- B Increased traffic on an already bad road.
- C Decrease in air quality especially for young & elderly
- D Noise which will migrate to sea rats flies etc
- E Decrease in property values
- F Raw material being in unsealed from Dublin area.
- G. Damage to fish spawning rivers
- H. Contrary to Midland Waste Management Plan

Yours, Janis Rittler



Hightown,
Coralstown,
Mullingar,
Co. Westmeath.

10/2/2005

The Secretary,
Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

**RE: Application by Thornton's Recycling Ltd. For a composting facility
at Pass of Kilbride, Milltownpass, Co. Westmeath**

To whom it may concern,

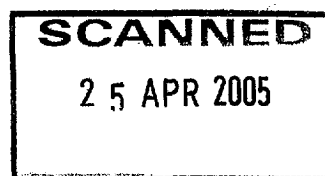
I wish to object to the granting of a waste licence to Thornton's Recycling Ltd. for the purpose of processing large quantities of waste at Pass of Kilbride, Milltownpass, Co. Westmeath, for the following reasons:

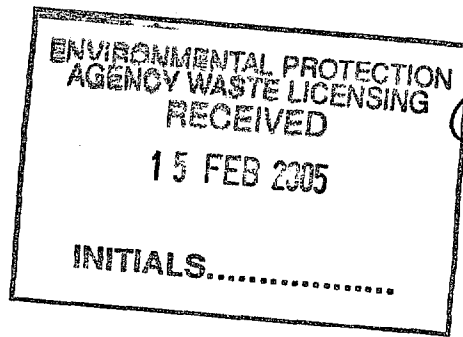
- 1) It could cause the pollution of air, surface water, water courses and ground water in the area.
- 2) It could damage the wells in the area.
- 3) It could create odour problems.
- 4) It could lead to an increase in vermin, flies and scavenger birds.
- 5) It could have a damaging effect on the health of people in the area.
- 6) It could create noise pollution.

If this licence is granted, it will have disastrous consequences for this area.

Yours faithfully,

Kathleen + John O'Brien





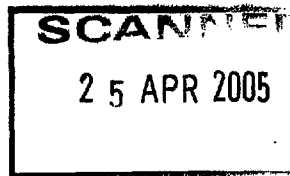
Calvin Lodge
Streete
Rathawen
Co. Westmeath

10th 02 05

The Secretary
The Environmental Protection Agency
Box 3000.

Johnstown Castle Estate.

Co. Wexford.



Re: The planning Application by Theantens
of Kileen Road in Dublin to build a
large Composting facility at Kilbride, Rathlumpass
Co. Westmeath.

To whom it may Concern.

I would like to object to the proposed
granting of a waste licence, for the following
Reasons.

- 1) The size of the industrial facility proposed
- 2) The volume of traffic,
- 3) spread of disease from rat Fox Badgers
flies and the possible spread of Foot and
mouth.

yours Faithfully
OLIVE Butler.

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

Culvin Lodge
Streete
Rathowen
G. Westmeath

The Secretary,
The Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

10th FEB 05

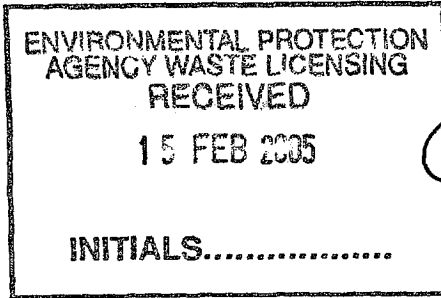
SCAN
25 APR 2005

Dear Sir / Madam,

I object to the granting of a
waste licence to Thornton's Waste, Dublin at Pass of Ulliside
Mulltompuss Co. Westmeath because...

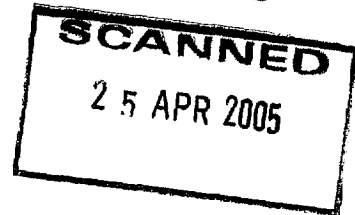
- (1) All our wells will be poisoned
- (2) Our air polluted with fine dust containing spores
- (3) The smell will be appalling.
- (4) Rats, mice, flies will increase & multiply.
- (5) This will be an industrial plant in the heart of the country.
- (6) Extra large articulated lorries on a minor road
- (7) Danger to walkers, cyclists etc.
- (8) Let inhabitants in Dublin take responsibility for their own waste

Yours faithfully
Julie Butler.



Calvin Lodge
Sreete
Rathowen
Co. Westmeath

9th FEB 05



The Secretary,
Environmental Protection Agency,
Box 3000,
Johnston Castle Estate,
Co. Wexford.

RE: Application by Thornton's Recycling Ltd, Villan Rd, Dublin for a waste permit to operate a composting facility at Pass of Killade, Mulltompas, Co. Westmeath.

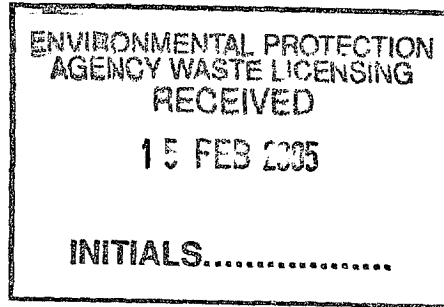
For inspection purposes only.
Consent of copyright owner required for any other use.

Dear Sir/Madam,

I object because the proposed site is:-

- A On top of aquifer.
- B Increased traffic on an already bad road.
- C Decrease in air quality especially for young & elderly
- D Nuisance which will migrate to area rats flies etc
- E Decrease in property values
- F Raw material being in needed for Dublin area.
- G. Damage to fish spawning rivers
- H. Contrary to Midland Waste Management Plan

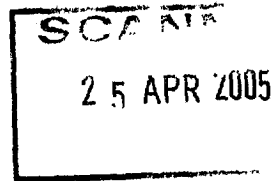
Yours,
Kim Butler



210-1 Sub 40
Gavin Lodge
Street,
Rathowen,
Co. Westmeath

THE SECRETARY
THE Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

10th FEB 05



I would like to object to Mr Thorntons
Recycling plant, proposed site pass of Kilbride
milltownpass, Co Westmeath.

I would ask you not to grant them a
licence for this plant as it will endanger
our livelihoods. This site will cause problems
such as flies, rats, foxes, badgers, these
animals spread all sort of disease like T.B.
Foot and mouth.

We in Westmeath look after our own waste
let Dublin look after theirs

Yours Faithfully.

Elaine Butler

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

Shamar,
Barradrum
Streete
Rathaven
Co. Westmeath

The Secretary,
The Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co Wexford.

10/05/FEB

Re: The planning application by Thornton's recycling, Killeen rd Dublin to construct a large composting facility at Kilbride Milltownpass, Co Westmeath.

To whom it may concern,

I wish to object to the granting of a waste licence to the aforementioned recycling company for the following reasons :

Siting an industrial facility in a rural area.
The increased volume of articulated vehicles on our local roads and the consequences for the safety of our children who use these at present as a valuable amenity for walking and cycling.

Vermin - rat, foxes, crows, seagulls, magpies, flies, badgers and other scavenger-type animals will be attracted to and multiply in such a facility, increasing the health risks to all humans, domestic, wild and farm animals in the area.
Sourcing of raw material - given that the company has told us that they will source hotel and restaurant waste from the Dublin area, knowing as I do that many of these food outlets purchase meat from suppliers who in turn source this outside the stringent controls of the E.U. (where Foot and Mouth ,T.B., Asian Fowl flu etc. are endemic).

Air quality - airborne aspergilli will irritate our lung tissue, especially in winter when our immune system is already trying to cope with the usual colds and flu.
Composting is the way of the future but I will not accept waste, produced outside the catchment area of Mullingar, to be processed at a site opposite my front door!

To site a large compost facility on top of a known aquifer is Genocide

Yours faithfully,

Shane Butler

SCANNED
25 APR 2005

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED

15 FEB 2005

INITIALS.....

Barradrum Beag
Streeete,
Rathowen,
Co. Westmeath

The Secretary,
The Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

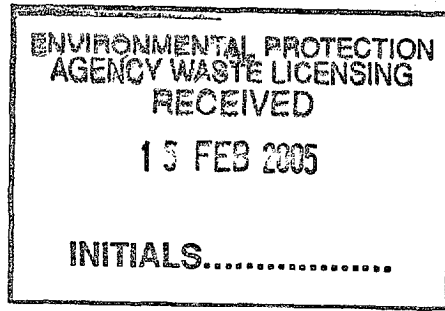
SCANNED
25 APR 2005

Dear Sir / Madam,

I object to the granting of a
waste licence to Thornton's Waste, Dublin at Pars of the side
Mulloughpass Co. Westmeath because:

- (1) All our wells will be poisoned
- (2) Our air polluted with fine dust containing spores
- (3) The smell will be appalling.
- (4) Rats, cows, flies will increase & multiply.
- (5) This will be an industrial plant in the heart of the country.
- (6) Extra large articulated lorries on a main road.
- (7) Danger to walkers, cyclists etc.
- (8) Let inhabitants in Dublin take responsibility for their own waste.

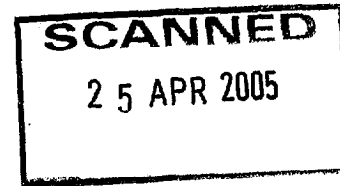
Yours faithfully
Marie Bittles



Colin
Streete
Rathowen
Co. Westmeath

The Secretary,
The Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

10th FEB 05



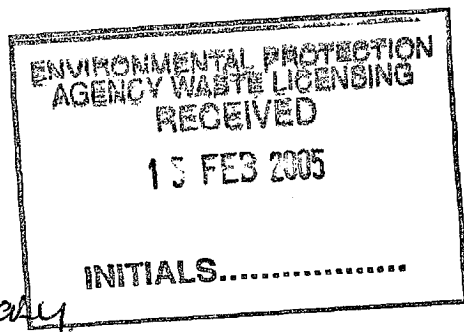
Dear Sir / Madam,

I object to the granting of a
waste licence to Thornton's Waste, Dublin at Pass of Melliside
Mullinspass Co. Westmeath because...

- (1) All our wells will be poisoned
 - (2) Our air polluted with fine dust containing spores
 - (3) The smell will be appalling.
 - (4) Rats, mice, flies will increase & multiply.
 - (5) This will be an industrial plant in the heart of the country.
- (6) Extra large articulated lorries on a minor road:
- (1) Danger to walkers, cyclists etc.
 - (2) Let inhabitants in Dublin take responsibility for their own waste

Yours faithfully

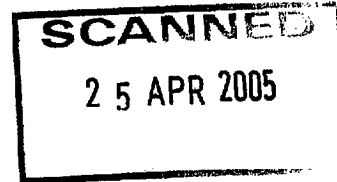
James
Butler.



210-1 Sub 36
Brigid Cullen
Farthingstown
Westmeath

The Secretary
The Environmental Protection Agency
Box 3000.
Johnstown. Castle. Estate.
Co. Westford.

10-2-05



Re: The planning Application by Theantens
of Kileen Road in Dublin. to build a
large Composting facility at Kilbride, Rathloughpass
Co. Westmeath.

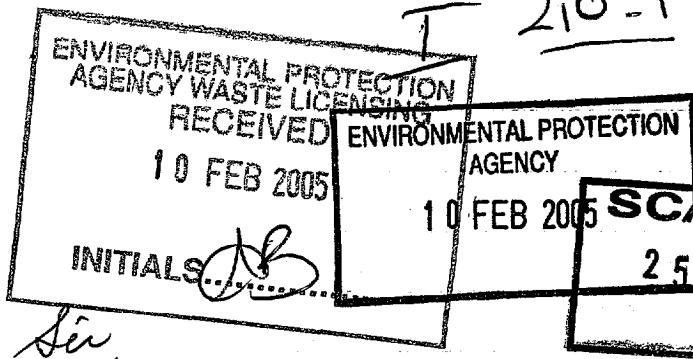
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To whom it may Concern.

I would like to object to the proposed
granting of a waste licence, for the following
Reasons.

- 1) The size of the industrial facility proposed
- 2) The volume of traffic,
- 3) spread of disease from rat Fox Badgers
Flies. and The possible spread of Foot and
mouth.

yours Faithfully B Cullen.



Sub (35)
Rattin,
Kinneagad
Co. Westmeath
9th February 2005

Dear Sir,

I am writing to you re the waste licence application by Thornton's Recycling Ltd for a composting facility at Pass of Kellbride, Milltownpass Co. Westmeath.

I wish to object in the strongest possible manner to the granting of this for the following reasons.

- ① The facility will be in contravention of the Midlands waste management plan.
- ② The road leading to the proposed site is totally unsuitable for the amount and size of the proposed traffic, even at the present time the road is humped and as there is bog on both sides of it coming close to the site.
- ③ The Proposal is contrary to the Westmeath County Development Plan.
- ④ It could have a damaging effect on people in the Area and the local Primary School is only about 1 mile from the proposed site. The proposed development ^{health of the} could have a damaging effect on the children and Adults of the Area.
- ⑤ It could also have a damaging effect on Farm Animals like what happened at Tipperary as Bio Aerosols could damage both animal and human health.
- ⑥ It could ~~damage~~ cause the Pollution

of Air, surface water water courses and groundwater in the area, which cause major problems and damage to wells used by people for their domestic water supplies

⑥ It could damage the underlying aquifer,
⑦ It could lead to an increase in flies, vermin and scavenger. Flies are carriers of disease

⑧ It could damage fish breeding areas in the Kinnegad River

⑨ Also crows would invade the place and this would be very risky as crows can spread Salmonella

⑩ It could create odour problems and also it could create noise pollution also the huge numbers of big refuse trucks would create huge traffic problems and would no doubt cause huge risk for other road users such as old people and children.

⑪ It could have a severe effect on the Milltownpass National Heritage Area which is next to it. This must not be allowed to happen

⑫ House and Land Prices within 25 miles of the Proposed Facility would fall by at least 25%

⑬ No doubt the Proposed facility would attract Plenty of Vermin including Rats Rats carry a host of dangerous diseases including the deadly Weil's disease.

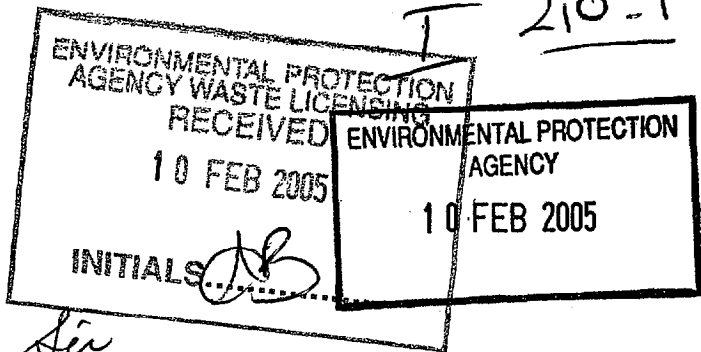
The Proposed facility could cause big problems for farmers. Under no circumstances

Can a licence be granted to Thornston's for a composting facility at Pass of Kibride Milltown pass, All the People of a huge area are completely and totally opposed to the granting of a licence to Thornston's Recycling.

I remain,

Yours faithfully
James Mc Caffrey

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Sub (35)
Rattin,
Kinnegad
Co. Westmeath
9th February 2005

Dear Sir,

I am writing to you re the waste licence application by Thornlon's Recycling Ltd for a composting facility at Pass of Kelbride, Milltownpass Co. Westmeath.

I wish to object in the strongest possible manner to the granting of this for the following reasons.

1) The facility will be in contravention of the Midlands waste management plan.

2) The road leading to the proposed site is totally unsuitable for the amount and size of the proposed traffic, even at the present time the road is hempyed as there is bog on both sides of it coming close to the site.

3) The Proposal is contrary to the Westmeath County Development Plan.

4) It could have a damaging effect on people in the Area and the local Primary School is only about 1 mile from the proposed site. The proposed development could have a damaging effect on the ^{health of the} children and Adults of the Area.

5) It could also have a damaging effect on Farm Animals like what happened at Tipperary as Bio Aerosols could damage both animal and human health.

6) It could ~~damage~~ cause the Pollution

of Air, surface water water sources and groundwater in the area, which cause major problems and damage to wells used by people for their domestic water supplies

(6) It could damage the underlying aquifer.
(7) It could lead to an increase in flies, vermin and scavenger. Flies are carriers of disease

(8) It could damage fish breeding areas in the Kinnegad River

(9) Also crows would invade the place and this would be very risky as crows can spread Salmonella.

(10) It could create odour problems and also it could create noise pollution also the huge numbers of big refuse trucks would create huge traffic problems and would no doubt cause huge risk for other road users such as old people and children.

(11) It could have a severe effect on the Milltown pass National Heritage Area which is next to it. This must not be allowed to happen

(12) House and Land Prices within 25 miles of the Proposed Facility would fall by at least 25%

(13) No doubt the Proposed facility would attract plenty of Vermin including Rats Rats carry a host of dangerous diseases including the deadly Weil's disease.

The Proposed facility could cause big problems for farmers. Under no circumstances

Can a licence be granted to Thorn's
for a composting facility at Pass of
Whirde Mill's pass, All the people of
a huge area are completely and totally
opposed to the granting of a licence to
Thorn's Recycling.

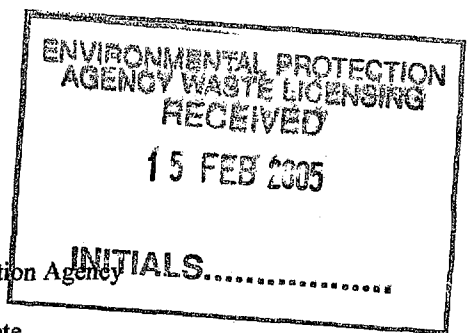
I remain,

Yours faithfully
James Mc Caffrey

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Consent of copyright owner required for any other use.

210-1

SUB 34



Hightown, Coralstown
Mullingar, Co. Westmeath
10/02/2005

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

OBJECTION TO: Waste Licence Application to Thorntons Recycling Ltd for a Composting Facility at Pass of Kilbride, Milltownpass, Co. Westmeath

Dear Secretary,

I am taking the time to write you this letter as I feel very strongly and would have many concerns regarding this industrial facility coming into the area. In my opinion this plant should be located in an Industrial area or close by an already existing landfill. This is a beautiful little country of ours and if plants such as this and others alike are moved out into rural and agricultural settings such as the Pass of Kilbride in Milltownpass, we won t have this beautiful place that we live in.

I myself have moved back to the area after twelve years of living in city environments, to get away from unhealthy air, pollution etc... My main reason for moving back to the locality was for the country lifestyle and the health benefits it has to offer, as I am twenty-eight and have multiple sclerosis. I made this choice and you too have a choice.

My Concerns:

- The bio-aerosols released could cause serious damage to animals in the area, as this is an equine and bovine breeding area.
- This increase in pollution such as flies, vermin, odours, noise and dust, therefore the spread of disease.
- This facility could have a damaging effect on the health of the people living in the area and surrounding areas, especially in the village of Milltownpass where a new Atheistic Unit was recently opened at the primary school by Minister Hannafin.
- The plant is proposed to be constructed on an underlying aquifer which in turn feeds all local wells and the Kinnegad River which is a tributary of the Boyne.
- The plant could have a damaging and serious effect on the bordering Milltownpass National Heritage Area. A proposal to upgrade the road will lead to the lowering of the natural water table of the bog land.
- Waste mainly from hotels and catering industries will be transported by lorry from Galway and Dublin. This will include meat pieces such as chicken and beef imported from South America which is well known for its outbreaks of foot and mouth. Obviously, this is dangerous to bring into an agricultural setting.

I hope you will take my concerns into account and refuse a Waste Licence to Thorntons for this plant on the reasons I have mentioned above. I thank you for your time.

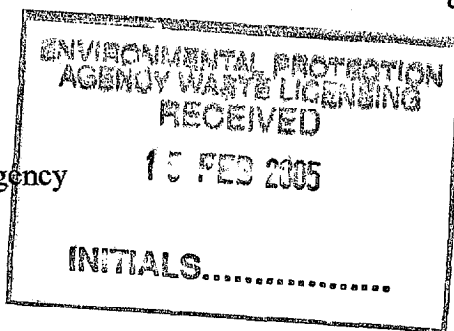
Yours sincerely
Thomasina Earley
Thomasina Earley

Knocharville 210-1.

Coralstown (Sub 33)

12th February 2005

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co Wexford



Re: Waste Licence Application by Thornton's Recycling Ltd
For a Composting Facility at Pass of Kilbride, Milltownpass, Co Westmeath

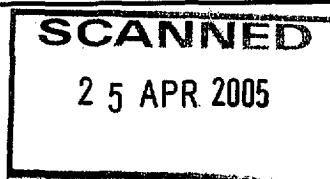
Dear Sirs

I wish to object to the proposed granting of this licence for the following reasons:-

1. The facility will be in contravention of the Midlands Waste Management Plan.
2. The road leading to the site is totally unsuitable for the amount and size of the proposed traffic.
3. The proposal is contrary to the Westmeath County Development Plan,.
4. It could have a damaging effect on the health of the people in the area.
5. It could cause the pollution of air, surface water, water courses, and ground water in the area.
6. It could lead to an increase in vermin and scavenger-birds.
7. It could damage the wells in the area.
8. It could damage the underlying aquifer.
9. It could damage fish-breeding areas downstream in the Kinnegad River.
10. It could create odour problems.
11. It could create noise pollution.
12. It could have a severe effect on the Milltownpass N.H.A. next to it.

Yours faithfully

Mary Murlagh



SUB 32

Ballintley
Violetstown
Emiscoffey,
Saybrook
10/2/05

SCANNED
25 APR 2005

The Secretary
Environmental Protection Agency
Box 3000
Sohinstown Castle Estate
Co Wexford.

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

For inspection purposes only.
Consent of copyright owner required for any other use.

Dear Secretary,

I wish to object to the proposed
granting of this waste licence application
to Thornton's Recycling Ltd, for a composting
facility at Pass of Kelbeide, Mulltownpass, Co. Wick.

I am a concerned parent that the
proposed plant will lead to an increase in
pollution such as vermin, flies, odours, noise and
dust. and that could have a damaging effect on
the health of the people in the area. not to

mention the animals in the area, as
this is a rural area and is surrounded
by farming land.

Yours sincerely

Patricia O'Neill

For inspection purposes only.
Consent of copyright owner required for any other use.

Ballintley
Violetstown
Emiscoffey,
Saybrook
10/2/05

210-1
SUB 32

The Secretary
Environmental Protection Agency
Box 3000
Salustown Castle Estate
Co Wexford.

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

Dear Secretary,

I wish to object to the proposed
granting of this waste licence application
to Thornton's Recycling Ltd, for a composting
facility at Pass of Kilbride, Mulltownpass, Co. Wick.

I am a concerned parent that the
proposed plant will lead to an increase in
pollution such as vermin, flies, odours, noise and
dust and that could have a damaging effect on
the health of the people in the area. Not to

For inspection purposes only.
Consent of copyright owner required for any other use.

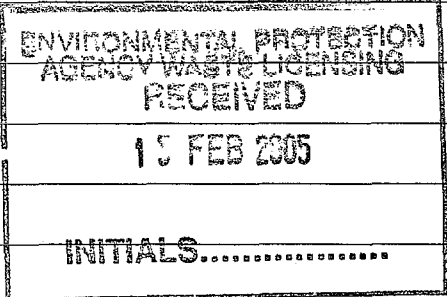
maintain the animals in the area, as
this is a rural area and is surrounded
by farming land.

Yours sincerely
Patricia O'Neill

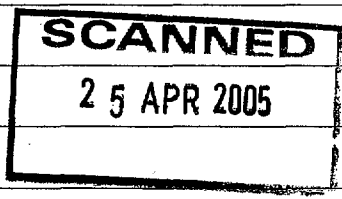
For inspection purposes only.
Consent of copyright owner required for any other use.

SUB 31

Enniscoffey,
Gaybrook,
Mullingar,
Co Westmeath.
10 Feb '05



The Secretary
Environmental Protection Agency,
Box 300
Johnstown Castle Estate,
B. Woodford.



Dear Secretary

Re waste license application to Thornton Recycling Ltd. for Composting facility at Fox & Kildrude, Milltownpass, Co Westmeath.

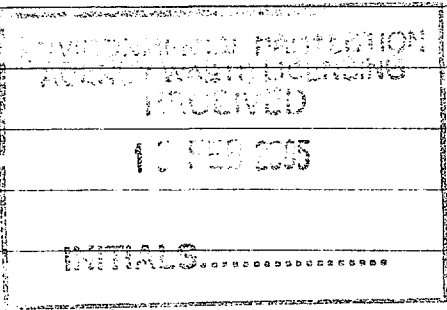
I wish to object to the proposed granting of this licence for the following reasons.

Health increased in pollutions such as Rats flies odours and any other health hazard, it may or should I say will bring my health and my family's health are very important to me. Thankfully our Minister Walshe did keep foot and mouth out, from what I hear we can expect food particles from dangerous foot and mouth countries.

This is not the place for this plant.
I hope you will consider my fears and refuse a waste licence to Thornton
Yours sincerely
Maec Calman

SUB 31

Ennis Coffey,
Gaybrook,
Hullingar,
Co Westmeath,
10 Feb '05



The Secretary
Environmental Protection Agency,
Box 300
Johnstown Castle Estate,
Co. Wexford.

Dear Secretary

Re waste license application to Thornton Recycling Ltd. for Composting facility at Pass of Kilbride, Milltownpass, Co Westmeath.

I wish to object to the proposed granting of this licence for the following reasons.

Health increased in pollutions such as Rats flies odours and any other health hazard, it may or should I say will bring my health and my family's health are very important to me. Thankfully our Minister Walshe did keep foot and mouth out, from what I hear we can expect food particles from dangerous foot and mouth countries.

This is not the place for this plant.

I hope you will consider my fears and Refuse a waste licence to Thornton

Yours sincerely Maeri Brennan

I.

SWB 30

SCANNED
25 APR 2005

RATTIN,
KINNEGAD,
Co WESTMEATH.

8th Feb 05.

To ENVIRONMENT PROTECTION AGENCY,
Box 3000,
JOHNSLOW CASTLE ESTATE,
Co WEXFORD.

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

RE APPLICATION BY THORNTON RECYCLING LTD, FOR PROPOSED
COMPOSTING FACILITY AT PASS OF KILBRIDE, MILLTOWNPASS
Co WESTMEATH.

DEAR SIRS/MADAMS.

We AS Householders and workers
in the immediate area, wish to register our
objections to the granting of a waste licence for
the above, for the following reasons.

I If allowed to go on it would mean that within
a 5 Kilometre Radius - in triangular
formation, there would be 3 such air polluting,
and traffic generating operations.

A. To the South East - LAGAN CEMENT WORKS -
quarrying and explosive assisted excavating - which
has a massive furnace making cement - and added
later - without the knowledge of many - A
LARNACADAM PLANT. These ARE NOW IN FULL OPERATION
AND RESPONSIBLE FOR CLOSE TO 7% OF NATIONAL EMISSIONS
People here are already suffering from the emissions -
if your duty of care wishes to investigate,
this is 2 KM from here as the crow flies.

B. Permission has already been granted for a waste facility — A Dump — at ANNASCANNON, CHOKRAVE, KINNEGAD. — just 3 km to the NORTH EAST.

C. THE PASS of KILBRIDE Application to the North West, by THORNTONS, would effectively turn this area into the Dump and Smells centre of Ireland. The plant itself, (proposed) due to its size, will generate massive extra traffic, added danger to pedestrians, farm operations, and schoolchildren. It will cause airborne smells, and fallout of dust and spores, from the fermentation and biological activity taking place. This will be less than 2 km as the crow flies North West!

There has to be an acceptable level of pollution, and each county and area must bear its share, but a third facility within such a small area is completely unjustified — in terms of this area in Co Westmeath.

There is already a small facility of this type, for the county, operating in the Mullingar area.

As a non farmer family we feel that local farmers should be nurtured and their produce given every encouragement to compete in a natural and organic countryside.

Yours Sincerely.

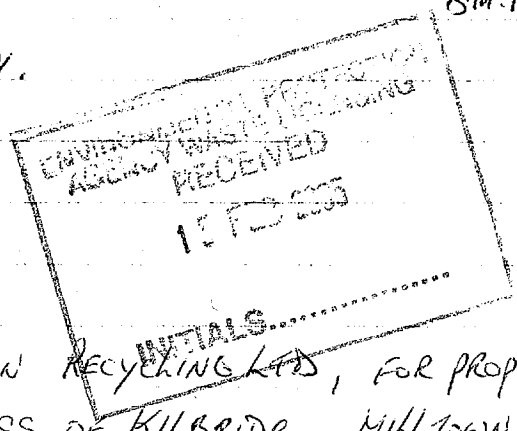
COLM DARDIS. x MARY DARDIS
Colm Dardis . Mary Dardis

I.

210-1
SUB 30

RATTIN,
KINNEGAD,
CO WESTMEATH.
8th FEB 05.

To ENVIRONMENT PROTECTION AGENCY,
Box 3000,
JOHNSTOWN CASTLE ESTATE,
Co WEXFORD.



RE APPLICATION BY THORNTON RECYCLING LTD, FOR PROPOSED
COMPOSTING FACILITY AT PASS OF KILBRIDE, MILKTOWNPASS
Co WESTMEATH.

DEAR SIRS/MADAMS.

We AS Homeowners and workers
in the immediate area, wish to register our
objections to the granting of a waste licence for
the above, for the following reasons.

I If allowed to go on it would mean that within
a 5 kilometer radius - in triangular
formation, there would be 3 such air polluting,
and traffic generating operations.

A. To the South East LAGAN CEMENT WORKS -
quarrying and explosive assisted excavating - which
has a massive furnace making cement - and added
later - without the knowledge of many - A
TARMACADAM PLANT. These ARE NOW IN FULL OPERATION
and responsible for close to 7% of NATIONAL EMISSIONS
People here are already suffering from the emissions -
if your duty of care wishes to investigate,
this is 2 KM from here as the crow flies.

B. Permission has already been granted for a waste facility — A Dump — at ANNASCANNON, CHOKRAVE, KINNEAD. — just 3 km to the NORTH EAST.

C. THE PASS OF KILBRIDE Application to the North West, By INCONTAINERS, would effectively turn this area into the Dump and SMELLS centre of Ireland. The plant itself, (proposed) due to its size, will generate massive extra traffic, added danger to pedestrians, farm operations, and schoolchildren. It will cause airborne smells, and fallout of dust and spores, from the fermentation and biological activity taking place. This will be less than 2 km as the crow flies north west!

There has to be an acceptable level of pollution, and each county and area must bear its share, but a third facility within such a small area is completely unjustified — in terms of this area in Co Wexmeath.

There is already a small facility of this type, for the county, operating in the Mullingid area.

As a non farmer family we feel that local farmers should be nurtured and their produce given every encouragement to compete in a natural and organic countryside.

Yours Sincerely.

COLM DARDIS x MARY DARDIS
Colm Dardis · Mary Dardis

Sub 29

Carleoon
MILLTOWNPASS
MULLINGAR
Co. Westmeath

10-2-05

SCANNED
25 APR 2005

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

The Secretary,
The Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Re: The planning Application by Theantens
of Kileen Road in Dublin to build a
large Composting facility at Kilbride, Mulltownpass
Co. Westmeath.

For inspection purposes only.
Consent of copyright owner required for any other use.

To whom it may Concern.

I would like to object to the proposed
granting of a waste licence, for the following
Reasons.

- 1) The size of the industrial facility proposed
- 2) The volume of traffic,
- 3) spread of disease from rat Fox Badgers
Flies and The possible spread of Foot and
mouth.

yours Faithfully
Kenneth Carley

Sub 27 & Sub 28

ENVIRONMENTAL PROTECTION AGENCY WASTE LICENSING RECEIVED
15 FEB 2005
INITIALS.....

The Secretary
Environment Protection Agency
Box 3000,
Johnstown Estate
Co. Westford

SCANNED
25 APR 2005

RE: application by Thornton's Recycling Ltd, Killen Rd
Dublin for a waste permit to operate a
Composting facility at Pass of Kilbride, Milltownpass,
Co Westmeath.

Dear Sir / madam

I object because the Proposed Site -

- A The SIZE of the Industrial Facility Proposed.
- B The Volume of traffic.
- C Spread of disease from Fox Badgers Flies
- D and the possible health of foot and mouth
- E Health of community Specially People with breathing
- F Conditions.
- G
- H.

Mrs Kathleen Coleman
Tommy Coleman
Kathleen Coleman JNR.

JJ Keegan
Anne Keegan
Jean Keegan
John-Paul Keegan.
Gloonaigh
Ballinagore
Co Westmeath.

Eske
Milltownpass Co Westmeath.

10th Feb '05

210-1
Sub 20

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005

INITIALS.....

Corlloon
Milltownpass
Mullingar,
Co. Westmeath.

THE SECRETARY
THE Environmental protection Agency
Box 3000
Johnstown Castle Estate
Co. WEXford

I would like to object to Mr Thorntons
Recycling plant, proposed site pass of kilbride
milltownpass, Co WESTMEATH

I would ask you not to grant them a
licence for this plant as it will endanger
our lively hoods. This site will cause problems
such as flies, Rats, Foxes, Badgers, These
Animals spread all sort of disease like T.B.
Foot and mouth.

We in westmeath look after our own waste
let Dublin look after theirs

Yours Faithfully
WILLIAM BYRNE

SCA
25 APR 2005

210-1
CORLEON
MILLTOWNPAE
Mulligan
Co Westmeath

Subs

The Secretary,
The Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

Dear Sir / Madam,

I object to the granting of a
waste licence to Thornton's Waste, Dublin at Plot of Ulliside
Miltownpass Co Westmeath because...

- (1) All our wells will be poisoned
- (2) Our air polluted with fine dust containing spores
- (3) The smell will be appalling.
- (4) Rats, mice, flies will increase & multiply.
- (5) This will be an industrial plant in the heart of the country.
- (6) Extra large articulated lorries on a minor road.
- (7) Danger to walkers, cyclists etc.
- (8) Let inhabitants in Dublin take responsibility for their own waste.

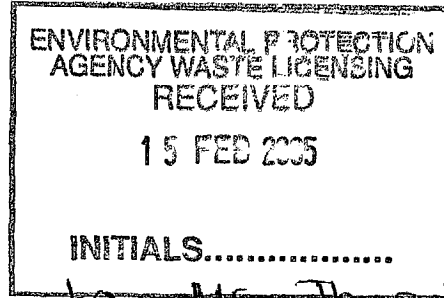
Yours faithfully
M. G. [Signature]

SCAN DATE
25 APR 2005

Returned
Unknown

210-1
Corcloon
Miltownpass
Mullingar
Co. Westmeath
10-2-05

THE SECRETARY
THE Environmental protection Agency
Box 3000
Johnstown Castle Estate
Co. WEXford



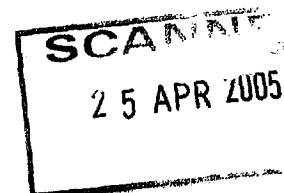
I would like to object to Mr Thornton's
Recycling plant, proposed site pass of Kilbride
Miltownpass, Co Westmeath

I would ask you not to grant them a
licence for this plant as it will endanger
our livelihoods. This site will cause problems
such as flies, rats, foxes, badgers, these
animals spread all sort of disease like T.B.
Foot and mouth.

We in Westmeath look after our own waste
let Dublin look after theirs

Yours Faithfully.

Paddy Lerry



Sub 23

GIBBONSLOW
ROCHFORD BRIDGE
WESTMEATH

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

The secretary,
Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Re: waste Licence application to Thorntons Recycling Ltd. for a Composting facility at Pass of Kilbride, Milltownpass, Co. Westmeath.

Dear secretary,

I wish to object to the proposed granting of this licence for the following reasons;

- The proposed facility will be in contravention of the **Midlands Waste Management Plan** and the **Westmeath County Development Plan**.
- The proposed facility could have a damaging effect on the **health** of the people in the local area and surrounding hinterlands, especially in the village of Milltownpass where recently there has been a new **Atheistic Unit** opened at the primary school by Minister Hannafin.
- Also the bio-aerosols released by this plant could cause serious damage to animals in the region, as this is an Equine and Bovine breeding area.
- This plant is proposed to be constructed on an underlying aquifer which in turn feeds all the local wells in the area and also into the **Kinnegad river** and its spawning grounds which is a tributary of the **Boyne river**.
- This proposed plant will also lead to an **increase in pollution**, such as vermin, flies, odours, noise and dust.
- The proposed Composting Plant could have a serious and damaging effect on the bordering **Milltownpass National Heritage Area**, by their proposal to upgrade the road which would in turn lead to lowering of the natural water table of the bogland.
- The majority of **raw material** for the proposed facility will be transported by lorry from the greater Dublin and Galway areas. This includes mainly waste from the hotel and catering industries. This procedure would be highly dangerous as it would include meat particles such as chicken and beef imported from South America, which is notorious for its outbreaks of **Foot and Mouth**.

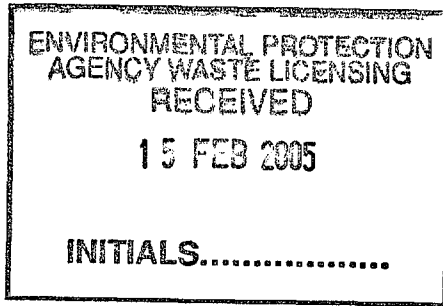
Therefore I feel that this plant should be located in an industrial region or close to an already existing landfill and not in a rural and agricultural setting such as Pass of Kilbride in Milltownpass. I hope you take my fears and concerns into account and refuse a Waste Licence to Thorntons for this plant on the reasons I have mentioned above.

Yours sincerely,

Anne O'Leary

SCANNED
25 APR 2005

Sub 2a



Crossanstown
Coralstown
Kinnegad
Co Westmeath

9 February 2005

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co Wexford

Dear Sir

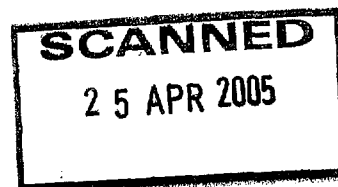
Re : Application by Thornton's Recycling Centre Ltd for a composting facility at Pass of Kilbride, Milltownpass, Co Westmeath

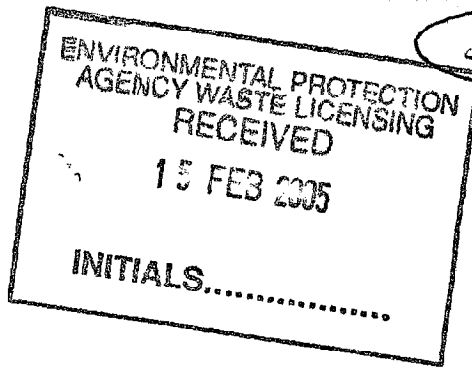
I strongly object to the granting of a waste licence to Thornton's Recycling for the purpose of processing large quantities of waste at Pass of Kilbride, Milltownpass for the following reasons :-

- a) The proposed composting facility would be sited on an area which will cause widespread pollution to all domestic wells within a radius of 2-3 miles.
- b) It would also create noise and air pollution.
- c) The road which leads to the proposed site is absolutely unsuitable for articulated lorries/HGVs which would deposit waste there.
- d) The proposed facility would be in contravention to the Midlands Waste Management Plan and is contrary to the Westmeath County Development Plan.

Yours faithfully


Noel O'Reilly

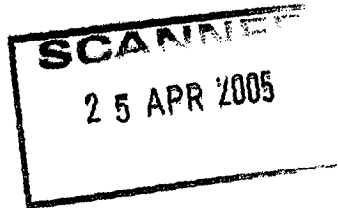




Sub 21

Llanura St
Ballinphort
Mullyfaenbo
Co. Westmeath
10th FEB 05

The Secretary,
The Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford.



Dear Sir / Madam,

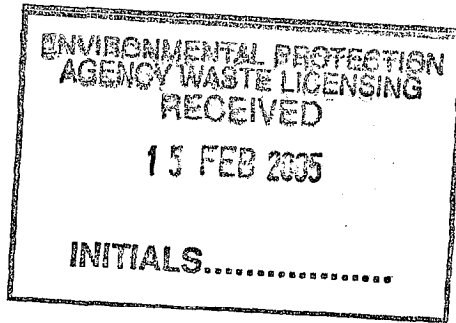
I object to the granting of a
waste licence to Thornton's Waste, Dublin at Pass of Ullvide
Mulltownpass Co. Westmeath because

- (1) All our wells will be poisoned
- (2) Our air polluted with fine dust containing spores
- (3) The smell will be appalling
- (4) Rats, mice, flies will increase & multiply.
- (5) This will be an industrial plant in the heart of the country.
- (6) Extra large articulated lorries on a main road
- 1) Danger to mothers, cyclists etc.
- 2) Let inhabitants in Dublin take responsibility for their own waste.

Yours faithfully
PATRICIA KANE

Sub 20

Enniscoffey,
Gaybrook,
Mullingar,
Co. Westmeath.
8th February 2005



Secretary,
Environmental Protection Agency,
Box 3000,
Milltown Castle Estate,
Wexford.

Re: waste License application to Thorntons Recycling Ltd, for a Composting facility at Pass of Kilbride, Milltownpass, Co. Westmeath.

Dear Secretary,

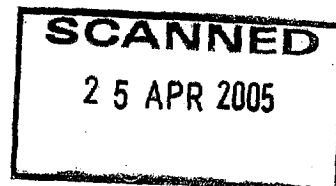
I wish to object to the proposed granting of this licence for the following reasons;

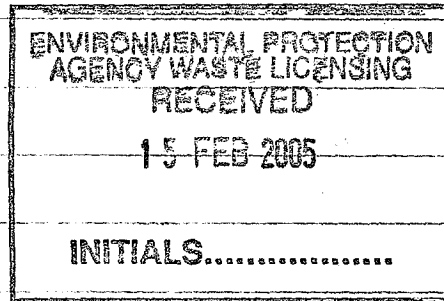
- The proposed facility will be in contravention of the Midlands Waste Management Plan and the Westmeath County Development Plan.
 - The proposed facility could have a damaging effect on the health of the people in the local area and surrounding hinterlands, especially in the village of Milltownpass where recently there has been a new Atheistic Unit opened at the primary school by Minister Hannafin.
 - Also the bio-aerosols released by this plant could cause serious damage to animals in the region, as this is an Equine and Bovine breeding area.
 - This plant is proposed to be constructed on an underlying aquifer which in turn feeds all the local wells in the area and also into the Kinnegad river and its spawning grounds which is a tributary of the Boyne river.
 - This proposed plant will also lead to an increase in pollution, such as vermin, flies, odours, noise and dust.
- The proposed Composting Plant could have a serious and damaging effect on the bordering Milltownpass National Heritage Area, by their proposal to upgrade the road which would in turn lead to lowering of the natural water table of the bogland.
- The majority of raw material for the proposed facility will be transported by lorry from the greater Dublin and Galway areas. This includes mainly waste from the hotel and catering industries. This procedure would be highly dangerous as it would include meat particles such as chicken and beef imported from South America, which is notorious for its outbreaks of Foot and Mouth.

Therefore I feel that this plant should be located in an industrial region or close to an already existing landfill and not in a rural and agricultural setting such as Pass of Kilbride in Milltownpass. I hope you take my fears and concerns into account and refuse a Waste Licence to Thorntons for this plant on the reasons I have mentioned above.

Yours sincerely,

Yvonne O'Reilly





Hightown
 Clongad
 Minnegad
 Co Westmeath
 9/2/2005

- The Secretary
 Environmental Protection Agency
 Box 3000
 Johnstown Castle Estate,
- Co Westmeath

Re: Application by Thornton's Recycling Centre Ltd. for a
 composting facility at pass of Kilbride, Milltownpass
 Co Westmeath

To whom it may concern,

I wish to object to the granting
 of a waste licence to Thornton's Recycling Ltd for the purpose
 of processing large quantities of waste at Pass of Kilbride
 Milltownpass Co Westmeath for the following reasons

1. It could have a damaging effect on the health of people
 in the area
2. It could damage the underlying aquifer resulting in
~~the~~ water pollution

Brian Brennan

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

Hightown
Clonsilla
Kinnegad
Co Westmeath
9/2/2005

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate,
Co Wexford

SCANNED
25 APR 2005

Re: Application by Thornton's Recycling Centre Ltd. for a
composting facility at pass of Kilbride, Milltownpass
Co Westmeath

For inspection purposes only.
Consent of copyright owner required for any other use.

To whom it may concern,

I wish to object to the granting
of a waste licence to Thornton's Recycling Ltd for the purpose
of processing large quantities of waste at Pass of Kilbride
Milltownpass Co Westmeath for the following reasons

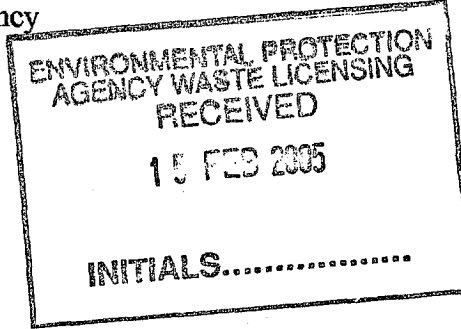
1. It could have a damaging effect on the health of people
in the area
2. It could damage the underlying aquifer resulting in
~~the~~ water pollution

Brian Brennan

Sub 18

The secretary
Environmental protection agency
Box 3000
Johnstown castle estate
Co wexford

Hightown
Coralstown
Kinnegad
co westmeath
9-2-2005



To whom it may concern

I wish to object to the granting of this waste licence to
Thorntons recycling LTD for the purpose of processing large quantities of waste at
pass of kilbride milltownpass co westmeath for the following reasons .

- (1)It could have a damaging effect on the health of people our children in the area .
- (2)The road leading to the site is totally unsuitable for the amount and size of the
proposed traffic 90 lorries each way .

For inspection purposes only.
Consent of copyright owner required for any other use.

yours sincerely

Denise Murray



(Sub 17)
Patrick Earley
Mill Company

10-2-05

The Secretary,
The Environmental Protection Agency
Box 3000,
Johnstown Castle Estate,
Co. Wexford.

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
15 FEB 2005
INITIALS.....

SCANNED
25 APR 2005

Re: The planning Application by Theantens
of Kileen Road in Dublin to build a
large Composting facility at Kilbride, Mullowpass
Co. Westmeath.

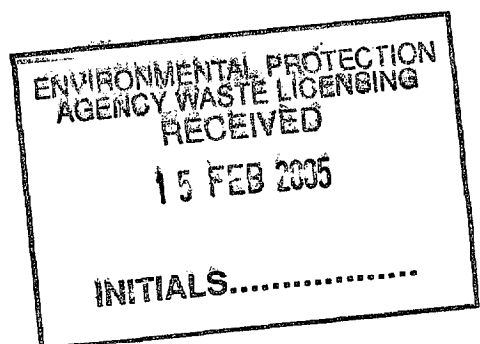
To whom it may Concern.

I would like to object to the proposed
granting of a waste licence, for the following
Reasons.

- 1) The size of the industrial facility proposed
- 2) The volume of traffic,
- 3) spread of disease from rat fox Badgers
flies and the possible spread of Foot and
mouth.

yours faithfully
PATRICK EARLEY

10th Feb 05 Sub 16



Cordoon,
Milltownpass,
Mullingar,
Co. Westmeath.

THE SECRETARY
THE Environmental protection Agency
Box 3000
Johnstown Castle Estate
Co. WEXford

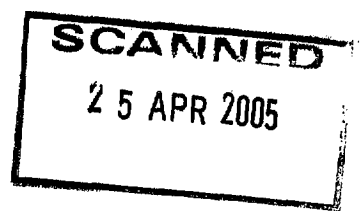
I would like to object to Mr Thorntons
Recycling plant, proposed site pass of kilbride
milltownpass, Co WESTMEATH

I would ask you not to grant them a
licence for this plant as it will endanger
our livelihoods. This site will cause problems
such as flies, rats, foxes, badgers, these
animals spread all sort of disease like T.B.
Foot and mouth.

We in westmeath look after our own waste
let Dublin look after theirs

Yours Faithfully.

Regina Byrne

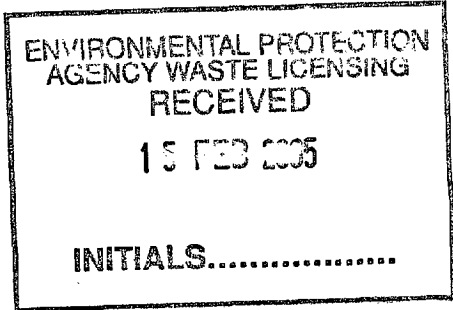


Sub 15

210-1

Knockaville,
Coralstown,
Mullingar,
Co. Westmeath

11/02/05



The secretary:
Environmental Protection Agency,
Box 3000,
Johnstown Castle Estate,
Co. Wexford

Re: waste license application to Thornton Recycling Ltd, for a composting facility at Pass of Kilbride, Milltownpass, Co. Westmeath.

Dear secretary,

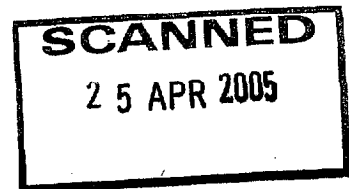
I wish to object to the proposed granting of this licence for the following reasons:

- The proposed facility will have a **damaging effect on the health of the people** in the local area and **surrounding hinterlands**.
- The proposed plant will lead to an increase in pollution, such as vermin, flies odours, noise and dust.
- **De-value property in the surroundings area** as a result of bio-aerosols released by this plant.
- Why do we have a **Midland Waste Management Plan and a Westmeath County Development Plan** if this facility is going to be in contravention to this plan?
- The majority of the raw material for the proposed facility will be transported by lorry from the greater Dublin area. This waste will mainly consist of waste from the hotel and catering industries. This procedure would be highly dangerous as it would include meat particles imported from South America, which is know for its outbreak of Foot & Mouth.
- This proposed facility would damage the local wildlife in what is a **rural and agricultural setting**.
- This facility should be located in or close to, an already existing landfill and not in an agricultural area.
- We are all only to well aware of the effects that pollution and toxins had on the animal life in the greater Tipperary area only a few short years ago. Re-assurances were given then that there would be no adverse effects but the reality was very different.
- Are we in this area to be subjected to the same fate?

Yours sincerely,

Dermot & Marie Hayden

Dermot & Marie Hayden



Boldfield
FA/BROOK
WEXFORD
G. Westmeath

THE SECRETARY
THE Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. WEXford

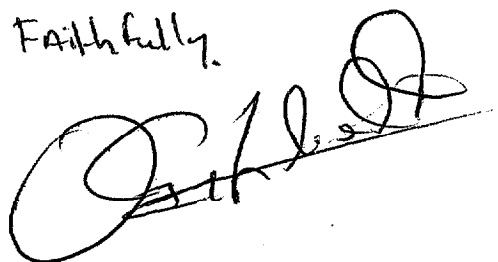
ENVIRONMENTAL PROTECTION
AGENCY
14 FEB 2005

I would like to object to Mr Thorntons
Recycling plant, proposed site pass of kilbride
milltownpass, Co WESTMEATH

I would ask you ~~not~~ to grant them a
licence for this plant as it will endanger
our livelyhoods. This site will cause problems
such as flies, RATS, Foxes, Badgers, These
Animals spread all sort of disease like T.B.
Foot and mouth.

We in westmeath look after our own waste
let Dublin look after theirs

Yours Faithfully



SCANNED
25 APR 2005

ENVIRONMENTAL PROTECTION
AGENCY
14 FEB 2005

McGrath Residence,
Clonfad,
Kinnegad,
Co. Westmeath
Date : 09/02/05

EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Ref : Proposed Composting facility at Kilbride Milltownpass, Co. Westmeath.

Dear Sir/Madam,

I wish to draw your attention to the following observations, concerns or issues we have with the above project.

- 1) The effect on the water table and the quality of water. Although we have been assured by representatives from Thorntons that the E.I.S has covered this, it must be noted that when the Gas main was being excavated many of the houses in the area were without water as their wells dried up. This scale of the new proposed development is much greater and could have more serious consequences.
- 2) The effect on air quality. Again we have been assured that there will be no odours as everything that is brought in to the plant is green waste but we are concerned that Thorntons will be unable to account for every lorry load of waste that comes into the plant and what chemical substances each load has been subjected to.

In conclusion we believe that our concerns are of a reasonable nature. We believe that before any work is carried out on site, the concerns outlined be addressed. We look forward to hearing from you.

Regards,



SCANNED
25 APR 2005

Suggested wording



ENVIRONMENTAL PROTECTION
AGENCY
14 FEB 2005

Sub (12) 210 - 1

Your Address
Date 10/2/05
CORALSTOWN
MULLINGAR
Co Westmeath

The Secretary
Environmental Protection Agency,
Box 3000
Johnstown Castle Estate,
Co Wexford

Re: application by Thornton's Recycling Centre Ltd. for a
importing facility at Pass of Milbride, Mullingarr,
Co. Westmeath

To whom it may concern,

I wish to object to the granting
of a waste licence to Thornton's Recycling Ltd. for the
purpose of processing large quantities of waste at Pass of
Milbride Mullingarr Co. Westmeath for the following reasons:-

- (1) - 5
- (2) 4
- etc. 13.

Michael & Nancy Egan

SCANNED
25 APR 2005

Suggested reasons for objecting. Please select the ones you wish and/or add your own.

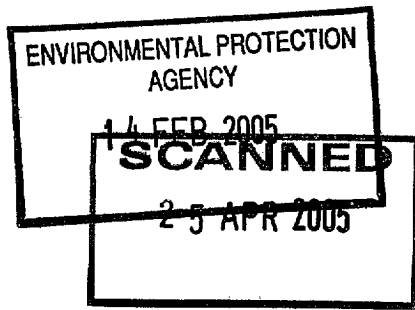
1. The facility will be in contravention of the Midlands Waste Management Plan.
2. The road leading to the site, is totally unsuitable for the amount and size of the proposed traffic.
3. The proposal is contrary to the Westmeath County Development Plan.
4. It could have a damaging effect on the health of people in the area.
45. It could cause the pollution of air, surface water, water courses, and groundwater in the area.
6. It could lead to an increase in vermin, flies and scavenger-birds.
7. It could damage the wells in the area.
8. It could damage the underlying aquifer.
9. It could damage fish-breeding areas downstream in the Kinneged River.
10. It could create odour problems.
11. It could create noise pollution.
12. It could have a severe effect on the Miltownpass N.H.A. next to it.
13. Bio-aerosols could damage human and animal health.
14. IMPORTED LIVESTOCK DISEASES IN RAW MATERIAL - ECONOMIC THREAT TO FARMING INDUSTRY

To Whom it may concern,

I wish to strongly object to the idea of Thorantous Recycling Ltd. Setting up at Kilbride, Mellown Pass.

I am very concerned about my family being so close to the proposed site, my Brother has a Heart condition. And I am sure whatever pollution would come from such a plant, would not be of any use to his health, or to that of his family. ... I use the roads to go for walks. also: as my Brother does. and with Lobbies, and extra heavy traffic on that Road. This would not be possible. as well as the Beag Road being unsuitable for such traffic.

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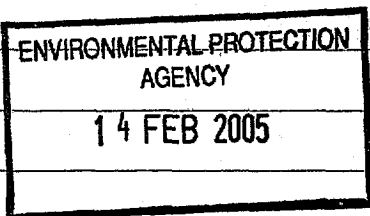


Please take into account the Peoples Health & Lifestyle.

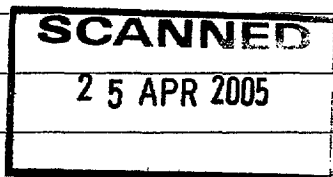
MRS Angela O'Leary
23 Green Rd
Mellown

Sub (10) 210-1

23 Green Rd
Mullingar
Co W Meath
12 Feb 05



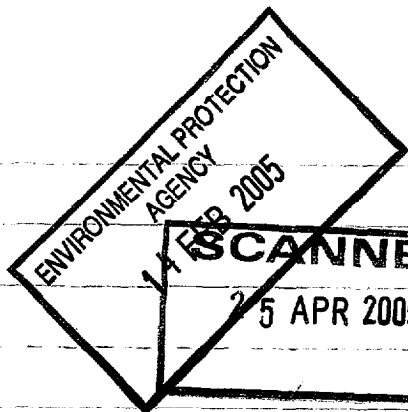
To whom it may concern,
I totally reject Thornton Recycling Ltd
to process large quantities of waste at Pass of Kilarde
Mulltown Pass
it could cause pollution to all rivers, and wells
as well as awful odours, etc, most important the
health of the people in the areas,



Patrick O'G

044-45554

Sub (9) 210.1



Graunville
Miltownpass
Mullingar
Co. W. Meath.
10.2.05.

Re: Waste licence application by Thorntons Recycling Ltd for a Composting facility at pass of Kilbide, Miltownpass. Co. W. Meath

To: whom it may concern.

I wish to object to the granting of the above for the following reasons. First and foremost I have four young children what would the damage be to their health.

The road leading to the site is totally unsuitable for the amount and size of traffic. The noise and odour will only cause

problem in this area.

my family and grandparents are
tuff every year right beside this
proposed site. I cannot think what
it would be like if this goes ahead.

yours concerned.

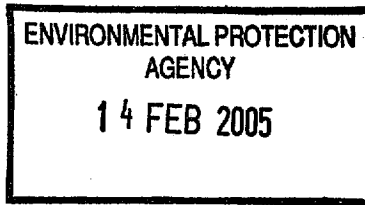
Anne Nolan.

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210-1

SUB 7

Manfred Huschka



Enniscoffey
Gaybrook
Co. Westmeath
Ireland

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

09.02.05

Re: Waste License application by Thornton's Recycling Ltd. for a composting facility at Pass of Kilbride, Milltownpass, Co. Westmeath

Dear sir,

I wish to object to the proposed granting of this license for the following reasons:

- It could damage the underlying aquifer (see my submission to An Bord Pleanala for Thornton's appeal to overturn refused planning permission of same site)
- The so-far undisclosed waste disposal of non-biodegradable waste will lead to a sharp increase of vermin and also scavenger birds in the area
- Created bio-aerosols could lead to health issues with humans and animals in surrounding area
- Planned importation of food waste from neighbouring counties incl. Dublin is contrary to the Westmeath County Development Plan.

I am available to outline my objection criteria further upon request.

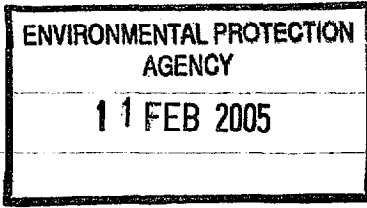
Yours sincerely

Manfred Huschka

Consent of copyright owner required for all uses



Sub 8 20-1



MILLTOWNPASS
MULLINGAR
Co WESTMEATH
8-2-05

Air Waste Licence application by
THORNTONS RECYCLING LTD for a
composting facility at pass of Kilbride
MILLTOWNPASS Co Westmeath.

I wish to object to the proposed
granting of this licence on the
grounds that it will effect the
underlying aquifer and will
damage the water system in the
area. The treatment of hotel waste
will also increase the vermin,
flies and scavenger birds and
increase the risk of disease
in our area.

To know this site it is set on
A Rural ROAD with Bog on
BOTH sides with a Beautiful wood
attached to the site. PLEASE
Protect our environment and the
HEALTH of my children by Refusing
The granting of this licence
I would be Greatful if you would
LET me know that you received my
LETTER or if you want to visit
The AREA I would show you
AROUND

yours
John Nolan

Subs (4) (5) (6) (7)

210-1

TELEFAX

To: The Secretary
Department:
Company: EPA
Telefax-No. +353 (53) 60699

Manfred Huschka
 Enniscoffey
 Gaybrook
 Co. Westmeath
 Ireland

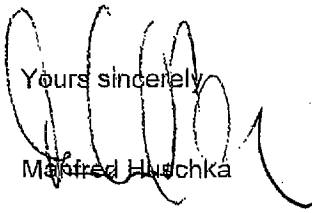
Nos. of pages: 5 incl. cover sheet
Date: 10 February, 2005

Dear sir,

Attached please find four letters of objections regarding a waste license application by Thornton's Recycling Ltd. for a composting facility at Pass of Kilbride, Milltownpass, Co. Westmeath.

We will also send those letters by regular mail.

Yours sincerely

Manfred Huschka


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SCANNED
 25 APR 2005

Susan Huschka

Enniscoffey
Gaybrook
Co. Westmeath
Ireland

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

09.02.05

**Re: Waste License application by Thornton's Recycling Ltd. for a composting facility at
Pass of Kilbride, Milltownpass, Co. Westmeath**

Dear sir,

I wish to object to the proposed granting of this license for the following reasons:

- It could damage the underlying aquifer (see our submission to An Bord Pleanala for Thornton's appeal to overturn refused planning permission of same site)
- The so-far undisclosed waste disposal of non-biodegradable waste will lead to a sharp increase of vermin and also scavenger birds in the area
- Created bio-aerosols could lead to health issues with humans and animals in surrounding area
- Planned importation of food waste from neighbouring counties incl. Dublin is contrary to the Westmeath County Development Plan.

I am available to outline my objection criteria further upon request.

Yours sincerely

Susan Huschka



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Manfred Huschka

Enniscoffey
Gaybrook
Co. Westmeath
Ireland

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

09.02.05

**Re: Waste License application by Thornton's Recycling Ltd. for a composting facility at
Pass of Kilbride, Milltownpass, Co. Westmeath**

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- Created bio-aerosols could lead to health issues with humans and animals in surrounding area
- Planned importation of food waste from neighbouring counties incl. Dublin is contrary to the Westmeath County Development Plan.

I am available to outline my objection criteria further upon request.

Yours sincerely


Manfred Huschka

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Lisa-Ann Huschka

Enniscoffey
Gaybrook
Co. Westmeath
Ireland

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

09.02.05

**Re: Waste License application by Thornton's Recycling Ltd. for a composting facility at
Pass of Kilbride, Milltownpass, Co. Westmeath**

Dear sir,

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I am available to outline my objection criteria further upon request.

Yours sincerely

Lisa-Ann Huschka

Lisa-Ann Huschka

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Eoghan Huschka

Enniscoffey
Gaybrook
Co. Westmeath
Ireland

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

09.02.05

Re: Waste License application by Thornton's Recycling Ltd. for a composting facility at Pass of Kilbride, Milltownpass, Co. Westmeath

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- It could damage the underlying aquifer (see submission to An Bord Pleanala for Thornton's appeal to overturn refused planning permission of same site)
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- Planned importation of food waste from neighbouring counties incl. Dublin is contrary to the Westmeath County Development Plan.

I am available to outline my objection criteria further upon request.

Yours sincerely


Eoghan Huschka

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210-1

SUB 6

Susan Huschka

ENVIRONMENTAL PROTECTION
AGENCY
14 FEB 2005

Enniscoffey
Gaybrook
Co. Westmeath
Ireland

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

09.02.05

**Re: Waste License application by Thornton's Recycling Ltd. for a composting facility at
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- The so-far undisclosed waste disposal of non-biodegradable waste will lead to a sharp increase of vermin and also scavenger birds in the area
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- Planned importation of food waste from neighbouring counties incl. Dublin is contrary to the Westmeath County Development Plan.

I am available to outline my objection criteria further upon request.

Yours sincerely

Susan Huschka

For inspection purposes only
Consent of copyright owner required for any other use

SCANNED
25 APR 2005

Eoghan Huschka

ENVIRONMENTAL PROTECTION
AGENCY

14 FEB 2005

210-1

80B 5

Enniscoffey
Gaybrook
Co. Westmeath
Ireland

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

09.02.05

**Re: Waste License application by Thornton's Recycling Ltd. for a composting facility at
Pass of Kilbride, Milltownpass, Co. Westmeath**

Dear sir,

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I am available to outline my objection criteria further upon request.

Yours sincerely

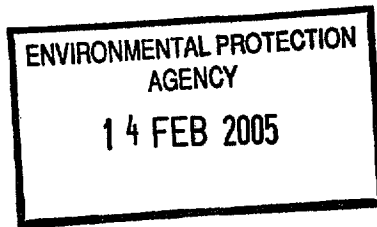
Eoghan Huschka
Eoghan Huschka

SCANNED

25 APR 2005

Consent of copyright owner required for all other uses
For inspection purposes only

Lisa-Ann Huschka



Enniscoffey
Gaybrook
Co. Westmeath
Ireland

SUB 4

The Secretary
Environmental Protection Agency
Box 3000
Johnstown Castle Estate
Co. Wexford

09.02.05

Re: Waste License application by Thornton's Recycling Ltd. for a composting facility at Pass of Kilbride, Milltownpass, Co. Westmeath

Dear sir,

I wish to object to the proposed granting of this license for the following reasons:

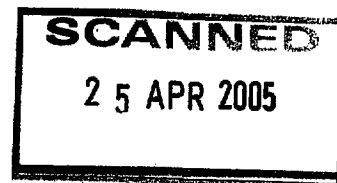
- It could damage the underlying aquifer (see submission to An Bord Pleanala for Thornton's appeal to overturn refused planning permission of same site)
- The so-far undisclosed waste disposal of non-biodegradable waste will lead to a sharp increase of vermin and also scavenger birds in the area
- Created bio-aerosols could lead to health issues with humans and animals in surrounding area
- Planned importation of food waste from neighbouring counties incl. Dublin is contrary to the Westmeath County Development Plan.

I am available to outline my objection criteria further upon request.

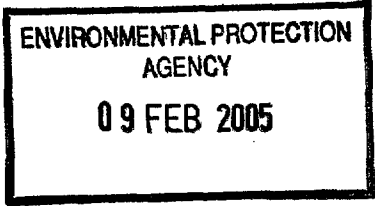
Yours sincerely

Lisa-Ann Huschka

Lisa-Ann Huschka



210-1



Cerastown Sub (3)

Mullingal
Westmeath

FIRE 4.02.05

Re: Shortons Proposed Restriction of Milltown
Pass & Surrounding Area.

It appears your dept. has taken caution
to the wind & accommodates a plan
to facilitate the storage amongst others.

You seemed to take these companies
display of power to task.

Our reasons are too numerous to
mention, the more we think about
it the more we see a daily new problem
living in this beautiful & desirable area
just yards away.

Simple examples

Road structure — Subsidizing —
Air Pollution — No limit the the
area affected from this fall out

Vermin carrying what diseases the are
well known (Widles) & unknown.

Unknown long term plans.

Aesthetics of this area — killed
We could go on & on because this
situation must not happen in this beautiful
area.

Yours Sincerely

William Hughes
Josephine Hughes
Jonathar Hughes
Declan Hughes
Marina Lavelle
Tergal Hughes

all the named have property
in this area.

Sub 2

210-1

**Milltownpass Residents and Environmental Group
C/o Hightown, Coralstown, Kinnegad, County Westmeath**

The Secretary,
Environmental Protection Agency,
Johnstown Castle Estate,
County Wexford.

5th December 2004

Re: Waste Licence Application by Thornton's Recycling Centre Ltd
for a Composting Facility at Pass of Kilbride, Milltownpass,
County Westmeath.

Dear Sir/Madam,

I enclose our observations/submissions on the application by Thornton's Recycling
Centre Ltd for a Waste Licence for the proposed Composting Facility.

Our main document entitled Submissions/Observations to the E.P.A. is our response
to the application. Supporting documents (appendices) are enclosed.

We have studied the Waste Licence Application and, with the documents we provide,
we ask you to refuse this Licence. If you decide to hold an oral hearing, we request
that we be heard at that hearing.

Yours sincerely

Richard G Murphy

ENVIRONMENTAL PROTECTION AGENCY <i>ec</i> 20 DEC 2004 OFFICE OF LICENSING & GUIDANCE

Enclosed also:

Submission by: Veronica Lynam, Chairperson.
Westmeath Environmental Group.

by: Cecil Ronaldson.
Neighbouring Stud Farm.

**Submissions/Observations to the E.P.A.
December 2004**

**Milltownpass Residents and Environmental Group,
C/o Richard Murphy, Hightown, Coralstown, Kinnegad,
County Westmeath.**

The Secretary,
E.P.A.,
Johnstown Castle Estate,
County Wexford.

SUBJECT: Submissions/Observations in opposition to the granting of a Waste Licence to Thorntons's Recycling Centre Ltd for a Composting Facility at Pass of Kilbride, Milltownpass, County Westmeath.

These are made on behalf of, and by the Milltownpass Residents and Environmental Group, a local body with an elected committee and with wide public support from local residents.

Supporting documentation is attached in appendices A to C, which are referred to in the main text. We further point out that planning permission has been refused by Westmeath County Council on three grounds.

1. "The proposed development will involve importation of organic waste from outside the Midland Region and thereby contrary to Midlands Waste Management Plan".
2. "The existing road network serving the site, being bog rampart for some part, is substandard and it is the policy of the Development Plan (5.3.9.) to restrict permitted development to housing development for a strictly limited number of family members, where access to alternative public roads is not available. The proposed development being industrial in nature would not come within the foregoing policy objective and is not considered to be in accordance with the proper planning and sustainable development of the area".
3. "Notwithstanding existing concerns regarding environmental impact, including impact to the ground waters, ecology and habitats of the area, including the adjacent designated N.H.A., Milltownpass Bog, that the information submitted has not adequately addressed, the proposed development is considered contrary to the policies and objectives of the Westmeath County Development Plan 2002 which discourages major industrial projects in the country side, policy reference 5.3.8.5. refers."

We totally support the County Council in its decision to refuse Planning Permission on the above grounds and wish them to be mentioned in these submissions/observations against the granting of a Waste Licence.

We further submit that the E.I.S. submitted by Thornton's Recycling Centre Ltd in support of their application is both flawed and incomplete as is shown in our Appendix A. We contend that the E.I.S. does not unequivocally show that the proposed development:

- (a) Will not cause injury to the health and well-being of persons living in the area.
- (b) Will not cause the pollution of air, surface water, water courses, or groundwater, with injurious consequences for humans, for flora and fauna, and for the farming community in the area.
APPENDIX A.
- (c) Will not generate an increase in vermin – with the added effect that pesticide control will have on local fauna.
- (d) Will not damage the wells of the households in the area.
APPENDIX A.
- (e) Will not, by watering to control dust, or as a result of flooding, damage the water courses during construction, and by daily traffic.
- (f) Will not endanger the underlying aquifer, classified as LG/E – a locally important sand/gravel aquifer when the ground water is extremely vulnerable to contamination.
APPENDIX A.
- (g) Will not endanger the bordering stream which is an important feeder stream for the Kinnegad River, and is part of the salmonid spawning area of that river.
APPENDIX A.
- (h) Will not guarantee to a sufficient degree that the process will contain all odours.
- (i) Will not guarantee that the screen of trees will be adequate to prevent noise pollution in the near future.

It is stated that “all material will be delivered to the facility in sealed containers” and that traffic will be directed to move to and from the site via the N.6. turn-off. However, no licensing regime is indicated to regulate these collectors/transporters. There would be no redress should these vehicles cause pollution by spillage around the proposed site. There is also no guarantee that the carriers under commercial and time pressures, will confine themselves to the route indicated.

There is insufficient evidence that the provision for run-off water from the concreted base area will provide adequate protection for local water courses. The same is true for leachate. APPENDIX A.

The amount of bio-aerosols created, and their effects, are questionable. In addition, in the absence of Irish guidelines on the siting of composting facilities, the E.I.S. depends on those published by the Environment Agency for England and Wales. These do not take into account Ireland's greater exposure to Atlantic wind and weather.

The proposals in the E.I.S. and elsewhere for the development of the Killucan road are purely aspirational. The existing road is totally inadequate for the traffic proposed. APPENDIX B. and APPENDIX C.

The site of the proposed facility is adjacent to an area designated as a National Heritage Area. This is a site of considerable conservation significance and is very vulnerable to any disturbance.

The characteristics of the proposed site, even allowing for the mitigation measures proposed by the applicant company, indicate that the proposed facility poses a serious environmental, health, and social risk to the local residents, local village and the surrounding rural communities.

On surface water, the E.I.S. indicates that "water quality sampling and analysis both on and off site and an assessment of on-site streams and ditches to determine water levels and flows" was carried out. The dates given indicate that this was carried out on two dates (given) which were during the driest period that local residents can recall for the last twenty years.

The section on Flora and Fauna states that "The site is not under any designation as per the E.U. Natural Habitats Regulations 1997 (S.1.No 94 of 1997). Nor is the site registered for containing any species under the Wildlife (Amendment) Act, 2000". While both statements are true, as things stand, they fail to reveal that the site is a hunting ground for the Barn Owl and the Pine Marten (both most likely based in the Milltownpass Bog N.H.A. immediately adjacent). This is vouched for by the local Wildlife Ranger and the local residents. The site itself is a well-known breeding ground for frogs. As all who use the road regularly know, the frogs can be almost a hazard on the road during the spawning season.

With regard to the Waste Licence Application by Thornton's Recycling Centre Ltd, may we point to Attachments E5 and to Attachment H.? Under the heading "water" in E.5. there is a reference to calculations in Chap.10 and Appendix 10.1 of the E.I.S. We would enquire as to the validity of these calculations as there is no current model to give them credence. The same is true for the claim made in Attachment H. (Emission points).

In Attachment J. Environmental Monitoring, we note that the section J.1. [Dust, PM10 and Bioaerosol] names no specific authority and no independent monitor. In J.3. [Groundwater] we feel that the monitoring offered is crude and not frequent enough. In J.4. [Air] the monitoring, apart from "odour and condition and depth of

biofilter", is to be bi-annual. This is not sufficient. In J.9. [Surface water] this crucial area is left to the site Environmental Manager. There is no mention of independent monitoring and there is no mention of crucial downstream monitoring.

It is our submission and observation that the Waste Licence Application by Thornton's Recycling Centre Ltd. is flawed and inadequate, as is the E.I.S. which supports it and that the application should be refused.

In support of our position we enclose –

APPENDIX A. – an assessment by Minerex Environmental Ltd., Taney Hall, Eglinton Terrace, Dundrum, Dublin 14.

APPENDIX B. – a summary of key observations by Graham Walmsley, Civil Engineer, Thomastown, Killucan, County Westmeath.

APPENDIX C. – a series of photographs which show the state of the road proposed as access to the site.

We contend that application made to you by Thornton's Recycling Centre Ltd. and the E.I.S. put forward in support of this application must be regarded as seriously in question arising out of these appendices which point to flaws within the application as well as the need for further investigation.

Signed: _____

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Richard G. Murphy
Westmeath Environmental Group
For and on behalf of:
Milltownpass Residents and Environmental Group,
Hightown,
Coralstown,
Kinnegad,
County Westmeath

Date: _____

5.12.04

APPENDIX A

ASSESSMENT OF ASPECTS OF EIS & WASTE LICENCE
APPLICATION FOR PROPOSED COMPOSTING FACILITY
AT PASS OF KILBRIDE, MILLTOWNPASS, CO.
WESTMEATH

MEL Report Ref. 1690-049.doc

Date: 15/11/04

Confidential Report To:

**Westmeath Environmental Group
Hightown
Coralstown
Mullingar
Co. Westmeath**

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Report submitted by :

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Issued by :

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1. Introduction

Minerex Environmental Ltd has been requested to review some aspects of the EIS and Waste Licence Application by Thornton's Recycling for a Proposed Composting Facility at Pass of Kilbride. This report deals with Chapters 3 to 11 of the EIS the main emphasis on Chapters 3 (Needs and Alternatives), Chapter 4 (Project Description), Chapter 10 (Surface Water) and Chapter 11 (Geology and Hydrogeology).

2. Needs & Alternatives (Chapter 3)

2.1 Alternative Locations (3.4.3)

The merits of the site at Pass of Kilbride as a suitable location for the proposed facility are discussed however the discussion does not include or indicate whether alternative locations were considered prior to the planning application. This is despite the fact that the "Guidelines on the information to be contained in Environmental Impact Statements, EPA, 2002" state that "the presentation and consideration of the various alternatives by the applicant is an important requirement of the EIA process. In this regard "alternatives" refer to locations, designs and processes.

It is stated in section 3.4.3 that "the site was selected due to its rural location, synergies with local peat extraction, low density of residential dwellings in the vicinity, excellent screening and its proximity to the National Road Network". This section of the EIS continues by addressing peat extraction and dwelling density in the vicinity of the subject site and then addresses the latter in general terms with regard to fungal spores. There is, however, no mention of alternative locations.

It is also stated in 3.4.3 that "a critical factor in the location of the site was the fact the general area has a history of peat extraction and the compost product will replace peat as a growing medium in horticulture". This however is a false proposition. The implication seems to be that the compost product would be used solely in the "general area", but this could not be correct, the product would surely be for nation-wide distribution. This being the case, the proposed development would not be critical to the subject site but could be at any suitable location in the Midlands.

It is also stated that the site was purchased "with the intention of applying for planning permission for a composting facility situated in the centre of the total landholding". The "Do-nothing Alternative" is addressed in section 3.4.5 and it is stated that "if the proposed facility at Kilbride is not developed, then organic wastes arising in Westmeath and the surrounding counties, ... will require disposal at other facilities in the area". This statement points directly at the need to look at alternative sites in the region and the only interpretation that can be taken is that an investigation of other sites has not been undertaken by the applicant. If it had, the applicant would surely have submitted information to demonstrate that the Kilbride site was the best available site.

It is further stated in section 3.4.3 that "these (types of) facilities should ideally be located in remote areas where the health risk is limited to the workforce ...". The initial intention therefore seems to have been to locate the facility where it might have the least impact in all respects which includes the distance from the public road frontage. However, the location of the proposed facility was changed after it was found that the subsurface conditions near the centre of the landholding were unfavourable. The location that is currently proposed for development is closer to the road and closer to residential dwellings, therefore it must be less suitable than the initially intended location. Being closer to the public road, it would have a large road frontage of some 270metres, therefore the proposed facility would not have the "excellent screening" that is claimed in section 3.4.3.

With regard to site selection for developments such as the current one it is normal practice to employ geographic information systems (GIS) to identify those sites that are most appropriate for particular developments. This system of analysis takes account of all relevant factors, such as natural features, landuse and infrastructure, and potentially suitable sites can be identified or eliminated with reference to prescribed criteria. After assessing all available and potentially suitable sites in a region in this way, a shortlist of a few sites, that are potentially suitable for the siting of the proposed development, would be identified. Those shortlisted sites would then be further evaluated by consideration of all relevant factors and after detailed site investigation. A rating would then be assigned to each site for all factors, with weightings applied where necessary in recognition of the importance of each factor. Comparative "scores" would then be obtained to identify a single preferred site. This is the accepted procedure in the selection of developments such as landfill sites. Unless such a procedure is undertaken it is not possible to identify the best potential site with regard to all relevant factors.

It is clear that this procedure was not undertaken for the current proposal and this absence of a site selection procedure effectively means that the proposed development at the subject site is invalid. There may be many sites in counties Longford, Westmeath, Offaly, Laois and North Tipperary that are more suitable than the subject site with regard to, for example, remoteness from dwellings, groundwater vulnerability, proximity to source materials and proximity to product markets.

3. Project Description (Chapter 4)

3.1 Environmental Impacts (4.7)

3.1.1 Noise

It is noted that it is admitted that local residents could experience nuisance from noise generated on site during construction. No details are provided on the extent or time at which the noise nuisance may be prevalent, which leads to an incomplete assessment of this impact.

3.1.2 Traffic

It is stated that during construction the site would be operated until 20:00hours Monday to Friday and that in operation the facility would operate until 18:00hours Monday to Friday therefore artificial lighting would be used after daylight hours in winter months. It is stated that "lighting will be designed to minimise the effect of light spillage beyond the site boundaries" ... For the same reason, the frequency of use of the local roads would be increased during those hours of darkness.

3.2 Groundwater & Surface Water Management (4.9)

It is stated in section 4.9 that a proprietary treatment system to treat domestic effluent will be installed on site and that it "is not expected to have a significant impact on groundwater". It is clear from this statement that the applicant is not giving an assurance that there would not be a significant impact on groundwater. This is unsatisfactory; the applicant must be able to give such assurance if the proposal is to be acceptable in this regard.

Figure 4.2 shows two "unpaved areas" in the southern part of the facility area but no explanation is given as to the purpose of these areas. The applicant should give an explanation of the purpose of these areas to confirm that their proposed use will not impact the groundwater, and explain how surface runoff from adjacent paved areas will not discharge into the unpaved areas, if that is the intention.

4. Human Beings (Chapter 5)

It is stated in section 5.2 that there are "no houses within 600m of the site boundary", but this contradicts the statement in section 4.2 that the nearest dwelling is 510m northeast of the proposed site boundary. Figure 5.1 indicates that the lesser figure is more accurate.

5. Air Quality (Chapter 6)

Dust monitoring was carried out at four locations on the site that was initially proposed for development (D1 to D4); these are approximately 1Km west from the currently proposed location. It is stated in section 6.4.3 of the EIS that two additional monitoring locations (D5 and D6) were subsequently used on the currently proposed location and that results would be included in the waste licence application. Bioaerosol results for two unidentified receptors (on-site 1 and on-site 2) are given in Attachment C.1 but no further dust results have been reported so the application contains no baseline dust results for the proposed facility location.

It is noted that four dust monitoring locations were deemed necessary when the initial investigation was carried out on the site to the west of the currently proposed site but that only two locations were used subsequently on the latter site. The applicant should explain why just two monitoring locations were considered necessary in this case when four had been used on the earlier site.

As in the EIS, the WLA refers to dust monitoring data most of which were obtained c.1Km from the subject site.

6. Noise (Chapter 8)

It is noted that four noise monitoring locations (N1 to N4) were deemed necessary when the initial investigation was carried out on the site to the west of the currently proposed site but that only two locations (N5 and N6) were used subsequently on the latter site. The applicant should explain why just two monitoring locations were considered necessary in this case when four had been used on the earlier site.

In the WLA it is stated that proposed "mitigation measures will ensure the potential noise impact from the site will not have a significant impact on local residents" however it is not possible to give an assurance on this matter. The effectiveness of mitigation measures could only be assessed after the fact.

As in the EIS, the WLA refers to noise monitoring data most of which were obtained c.1Km from the subject site.

7. Traffic (Chapter 9)

7.1 Amounts of Waste and Product

In section 9.4.1 it is stated that the annual amount of product would be 50,000tonnes. Given an intake of 90,000tonnes a year the applicant should provide figures indicating how the net annual amount of 40,000tonnes is consumed for reasons of clarity.

7.2 Road Widening

The proposed access to the site (stated in the EIS Section 9.9) requires that the public road between the Pass of Kilbride and the proposed site entrance should be widened by 1.0 to 1.3metre, and that the widening should occur on one side only. However no consideration seems to have been given to the fact that Milltownpass Bog, a National Heritage Area protected under the European Habitats Directive (Ref. 1) lies immediately to the northwest of the road and should therefore not be encroached upon. In this regard, Figure 9.1 in the EIS, showing the access road from the Pass of Kilbride, should identify the boundary of the NHA. The area of road widening recommended (section 9.10 in the EIS) should also be highlighted, and any potential impacts on the NHA be assessed and documented in the EIS.

8. Surface Water (Chapter 10)

8.1 Surface Water Flow

In section 10.2 it is stated that "all relevant calculations are included in Appendix 10.1", however not all calculations are given, for example, using the rational method reference is made to peak discharge estimation for storms of various intensity and duration but calculations supporting this claim are not submitted. Also, it is stated that calculations for sedimentation ponds are included in Appendix 10.1 but there is no reference to these in Appendix 10.1 nor in the text of the EIS. Some parts of Chapter 10 and Appendix 10.1 lack clarity and it is difficult to follow how decisions were arrived at, for example how the figure of 955m³ was calculated for excess runoff from a 20-year return period 24hour rainfall event. It would assist an evaluation of the EIS if the way in which the various figures were obtained were transparent.

The term Standard Average Annual Rainfall (SAAR) has been used in formulae to estimate stream flow in Appendix 10.1 and section 10.6.3, and a value of 841mm has been used, stating that the value is "per Met Eireann data". However the method by which the value was obtained is not given and an enquiry with Met Eireann has revealed that the term SAAR is not one that is used by Met Eireann.

A 20-year return period rainfall event has been considered for the soakaway but a 50-year event would be more appropriate and more normal to use in such a calculation. The soakaway has been designed to accommodate the excess runoff from a 20-year return period 24hour rainfall event with only a little extra capacity on the basis that the stored water would be able to infiltrate into underlying natural formations. However this proposal has been made without determining the infiltration capability of the formations at the location: the nearest testing was carried out more than 100m from the centre of the proposed soakaway (percolation area). Therefore the potential performance of the soakaway and the consequent impact on the underlying groundwater body is not known.

An oil/water separator has been proposed for installation on the surface water discharge line but the size and type of separator has not been specified.

8.2 Surface Water Monitoring

Monitoring location SW4 is proposed downstream of the two proposed discharge points on the tributary to the Kinnegad River on the northeastern boundary of the proposed site (Figure 10.1). However a deep drainage ditch runs between the site and the public road along the southeastern site boundary (section 10.5.1) and discharges to the tributary of the Kinnegad River downstream from SW4. Therefore, if contaminants were to enter this deep ditch, by way of baseflow from the site, it could not be detected. A monitoring location should therefore also be proposed in the ditch just upstream from the confluence with the tributary to the Kinnegad River.

Given that monitoring location SW4A is the only one downstream from the proposed facility a baseline sample should have been taken on more than one occasion. The quality of the water may vary seasonally, therefore it would have been prudent to take samples at different times of the year. The data submitted may be inadequate to characterise the existing environment adequately.

Westmeath Environmental Group
Assessment of EIS & Waste Licence Application
Proposed Composting Facility, Pass of Kilbride

It is noted from the WLA that no assurance is given that leachate and other elements will not impact on the surface water environment, rather that there would be an impact.

8.3 Vulnerability of Salmon Fisheries

Discharge of surface water runoff from the proposed composting facility is proposed to be into a stream that is the source of the Kinnegad River, (as indicated on MAP 1, Hydrometric Network Water Level Recorders, EPA, July 1995). The risk of either sediment loading, leachate, oils or sewage reaching the Kinnegad River must be considered in the event of failure of surface water treatment processes. Kinnegad River is a salmon spawning ground, thereby protected under Annex II of the European Habitats Directive (Ref 1). A full assessment of the potential effects of the above listed contaminants on the fishery should be undertaken and the applicant should submit proposed mitigation measures.

9. Geology and Hydrogeology (Chapter 11)

9.1 Hydrogeology (11.3.4)

Some of the statutory limits given in Appendix 11.7 are incorrect.

Attachment H of the WLA fails to identify the bunded soakaway for excess surface runoff as an emission point. In view of the fact that infiltration to ground is proposed in the bunded storage area, it is suggested that an additional groundwater monitoring point should have been proposed between the bunded area and the nearby stream.

9.2 Aquifer Classification and Vulnerability Rating

It is stated that that the gravel stratum under the site forms part of a Locally Important Sand/Gravel Aquifer (Lg) and that it has an Extreme vulnerability rating with regard to the possibility of contamination. The results of site investigations at the site, in the form of trial pitting and borehole drilling, show that the top of the gravel aquifer is shallower beneath the eastern part of the site. From the limited groundwater level data in the EIS it is concluded that the thickness of unsaturated aquifer in that area is less than 1.5m and this would make groundwater at this location particularly vulnerable.

9.3 Groundwater Protection Response

The groundwater protection response has been assessed without fully identifying all the hazards on site that are identified in Chapter 4. Consequently a response rating has been provided for the wastewater treatment system for site employees but not for the development as a whole. For example, the presence of leachate in the recycling process is a hazard and that should also be considered and given a response rating. The

waste related activities of the site are such that a response rating based on the Geological Survey of Ireland "Groundwater Protection Responses for Landfills" is the most applicable, as it is relevant to the potential leakage of leachate into the groundwater. This would give a rating of R3² which states:

Not generally acceptable unless it can be shown that:

There is a minimum consistent thickness of 3 metres of low permeability subsoil present;

There will be no significant impact on the groundwater; and

It is not practicable to find a site in a lower risk area.

These conditions would need to be satisfied before the proposed development could be adequately assessed.

A groundwater risk assessment of the composting facility operation should be undertaken whereby all hazards are identified. This should include all substances imported to and exported from the composting facility, as well as discharges related to sewage treatment for on-site personnel. Groundwater response ratings should be determined for each hazard identified.

9.4 Vulnerability of Underlying Aquifer

It is stated in section 11.7 that impacts on the groundwater are predicted from the proposed facility.

It is also stated that the top of the gravel aquifer is generally between 1.2 and 3.0 metres below ground level (mbgl) and the site investigation logs in Appendices 11.1 & 11.2 show that BH2 is the only site of 9 boreholes and 11 trial pits which shows a till cover to 3m or greater. This indicates that the protective cover is typically less than 3m in thickness.

High permeability in the gravel aquifer, measured at 777m/d, and lack of any significant drawdown supports the theory that there is a significant groundwater body beneath the site, which may be more extensive than indicated by the site investigations. It is typical for glacial tills to have lenses of sands and gravels that are discontinuous but hydraulically connected. This continuity can be both vertical and horizontal; 4 of the 9 site investigation boreholes show clay layer below the gravels at between 9.7 and 10.4m below ground level, therefore the depth of the gravels remains undetermined at five of the nine locations drilled across the site. The status of hydraulic continuity/discontinuity between the gravel aquifer and the bedrock aquifer has not been determined in the EIS. Therefore there is a potentially significant risk to the underlying overburden and bedrock aquifers, notwithstanding the use of concrete hard standing.

Two of the households in the north of the locality have shallow wells (3.9m and 1.2m deep) from which domestic supplies are abstracted and the gravel aquifer from which the groundwater is taken may be in hydraulic continuity with that beneath the site.

The location of the proposed facility in the vicinity of a major fault, as indicated in Figure 11.2 in the EIS, also contravenes the principles of Best Practicable Environmental Option (BPEO) as referred to in Chapter 3.4.1

of the EIS. Such a fault and associated fractures along the shear zone in the bedrock is potentially an area of higher bedrock permeability and may constitute a higher risk area.

The wider extent of the gravel aquifer beneath the site should be considered and possibly investigated using geophysics and/or local well audits and associated drill records so that the risk to all groundwater users can be assessed.

9.5 Vulnerability of Local Wells

A site-specific well audit is not reported in the EIS and it is stated in section 11.4 that there may be domestic abstraction wells approximately 510m from the site, implying that such an audit was not undertaken. Nine houses are within 1km of the site, on the northeast side, and are all on private wells according to communication from the locals. Four of these houses are within 650m of the site boundary. In view of the fact that the proposed development is located on a highly permeable locally important sand/gravel aquifer that is extremely vulnerable to contamination these groundwater supplies are potentially at risk. Although there is a stream between the site and the houses to the northeast of the site, which may act as a boundary to groundwater flow, the status, depth and water-bearing formation of each of the local wells should be determined as a matter of course. There is also a potential for contaminants to enter the aquifer via discharges to the stream.

Summarising the data above, there is insufficient protective cover over the underlying groundwater bodies at the site at the Pass of Kilbride and according to the guidelines of the Geological Survey of Ireland ("*Groundwater Protection Schemes, Geological Survey of Ireland, 1999*") the site is not generally acceptable, unless the risk to groundwater related receptors can be proven to be the lowest possible for this type of development.

10. Contingency Arrangements

Section 11 of the WLA (Contingency Arrangements) fails to give information on staff training and does not give copies of the relevant recording forms for the different procedures.

11. References

1. SI No. 94/1997: European Communities (Natural Habitats) Regulations, 1997

APPENDIX B

Proposed Composting Facility

Pass of Kilbride

Key Observations

1.0 Choice of Site Location

- 1.1 The selection of a site for composting which by its nature has an impact upon the environs of the Pass of Kilbride has to be based upon sound technical and engineering criteria.
- 1.2 It is considered that more appropriate sites have not been considered and that there are fundamental reasons why this development should not receive planning permission in its current form. These are listed under several headings and are not in any order of priority

2.0 Access and Roadway

- 2.1 Access to the proposed site is along the old bog road, which runs from the Pass of Kilbride to Correlstown.
- 2.2 The bog road as can be seen from observation was not constructed to carry heavy goods vehicles and the road will ultimately deteriorate and the formation will fail. This will create a hazard to those inhabitants of the area who commute to Miltown Pass and the surrounding areas.
- 2.3 The bog road which is derestricted is also too narrow for the use of regular heavy goods vehicles which will travel to and from the site via the N6 and the road is unsuitable and the potential for accidents would be greatly increased.
- 2.4 The developer proposes to use this access and during winter months this area of open land is subject to black ice. The proposed increase in heavy goods traffic in winter conditions would not be acceptable from a health and safety case risk analysis for the change in use of this road.
- 2.5 There are no street lights on this road and during periods of darkness and in winter months, with the possibility of icing, the use of this road by a continuous stream of refuse vehicles interfaced with cars taking children to school would create an unacceptable the risk of accidents to local residents and could not be supported by a road safety case.

3.0 Change of Land Use (Agricultural to Industrial)

- 3.1 The proposed site falls within a rural area having protected bog lands and subject Heritage Guidelines. It is not considered that this proposed industrial unit meets the Planning Criteria for this area.

4.0 Contamination of Water Courses and Aquifer

4.1 The location of this proposed composting plant will have a severe and adverse affect on the surrounding protected bog lands and watercourses due to the inevitable pollution that will be created by Leachate and liquours that will be produced by this plant

4.2 The aquifer is acknowledged to be highly vulnerable and it is incontestable that pollution of the aquifer and water bearing superficial deposits will occur as a consequence of pollution from the plant. The result of such pollution will irreparably contaminate local wells and the aquifer rendering them unusable for inhabitants and farm use.

5.0 The Environment

5.1 There is concern that the leachate and emissions from the Plant will have a long term adverse effect upon the protected bog lands, flora and fauna. Certainly it will affect a change on the equilibrium of these wet lands.

5.2 Where will the Leachate be transported to and how will it be processed.?

6.0 Vermin

6.1 The potential for a rapid increase in the rat population of the area where there will be an abundance of food and water should not be underestimated. Rats are becoming increasingly resistant to poisons and will be difficult to control.

6.2 The laying down of poisons and the potential to enter the food chain of those animals that inhabit the bog will have a changing effect upon the ecology of the area.

7.0 Health of the Community

7.1 The health of workers and the local community within a prescribed area would require to be monitored with regard to the effects of pollution particularly those chemicals that are carcinogenic.

8.0 Safeguards

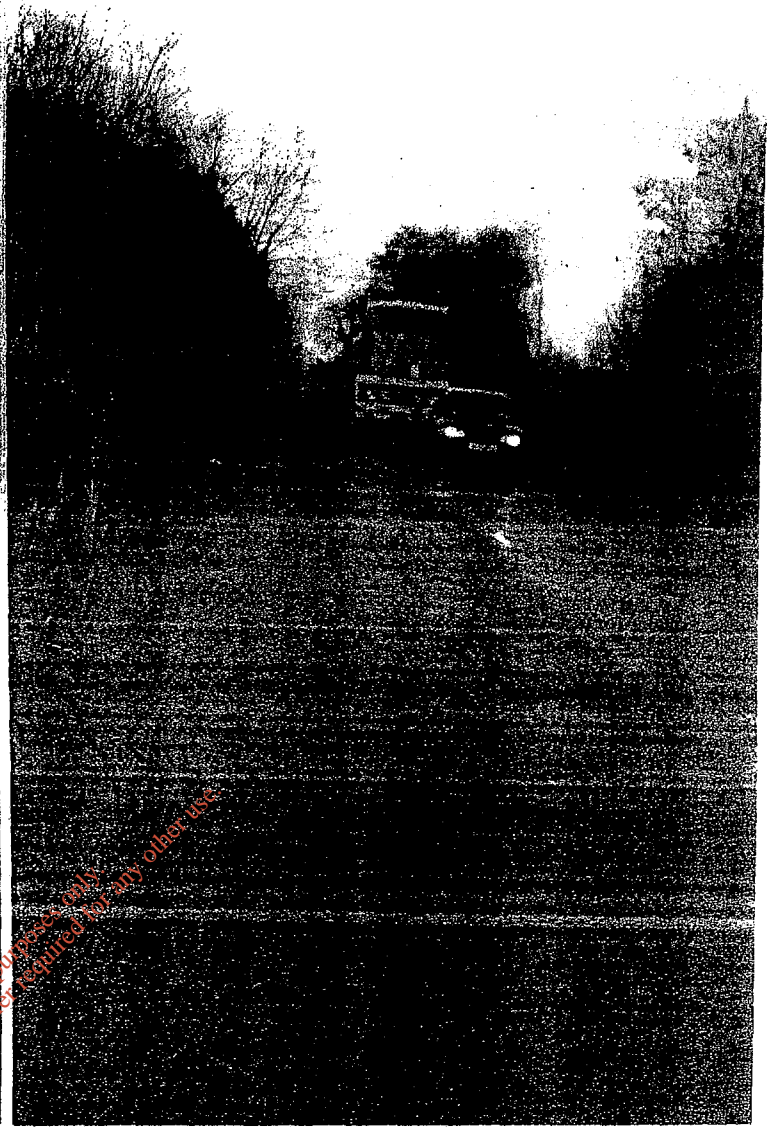
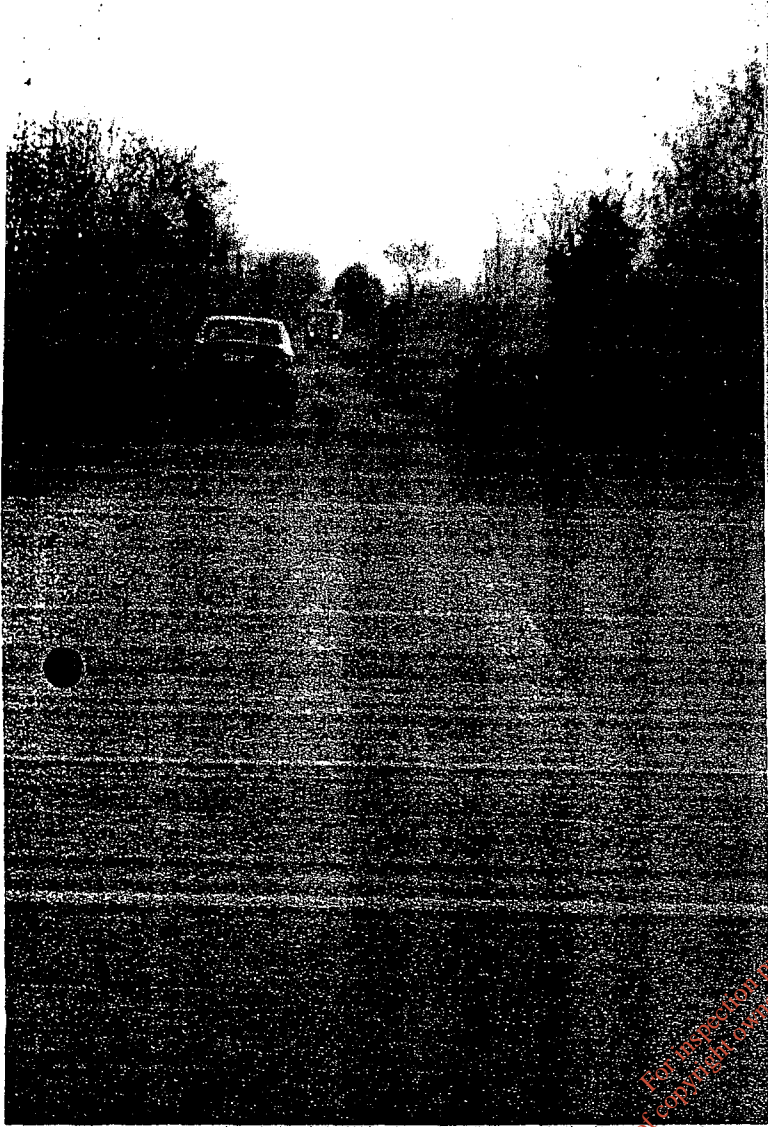
8.1 What safeguards are proposed by the developer in the event of this venture being unsuccessful and abandoned in the future? Is the developer willing to enter into a guarantee bond for pollution and the decommissioning of the plant and its return to its original status should this venture be unsuccessful



APPENDIX C.

**The road proposed for access
to the site for proposed
Composting Facility
by Thornton's Recycling Centre Ltd.
Pass of Kilbride
Milltownpass
County Westmeath**

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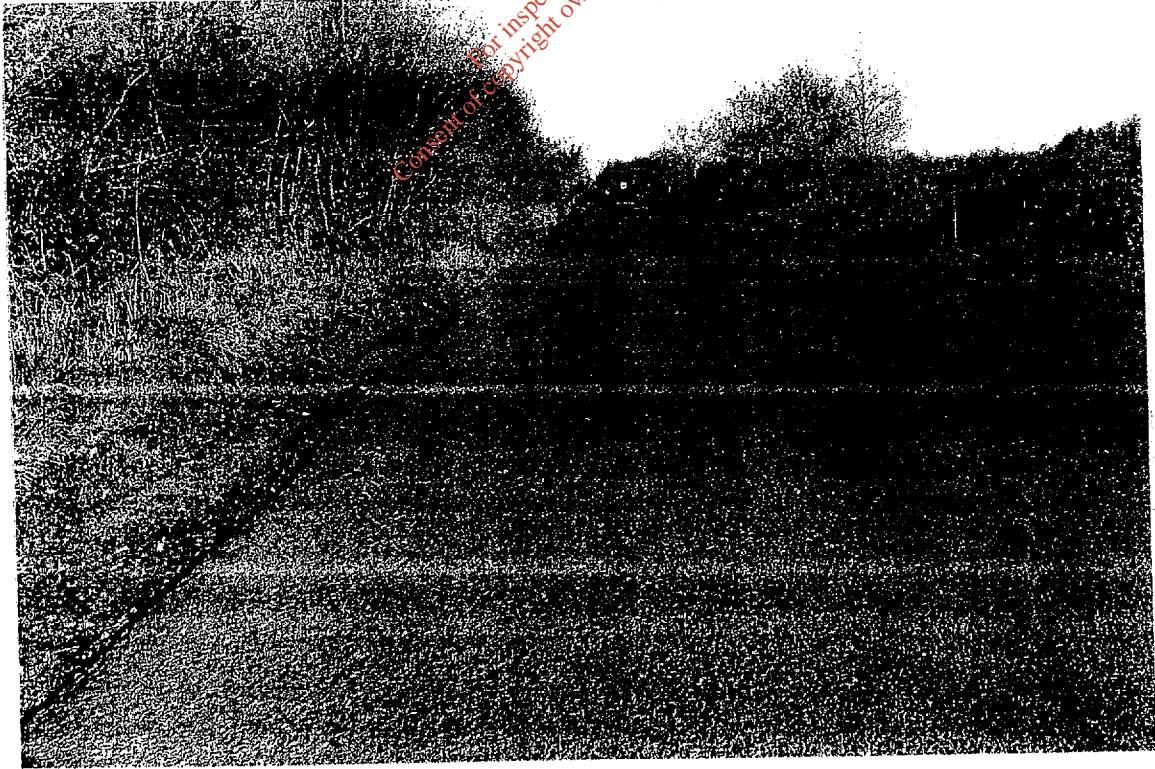


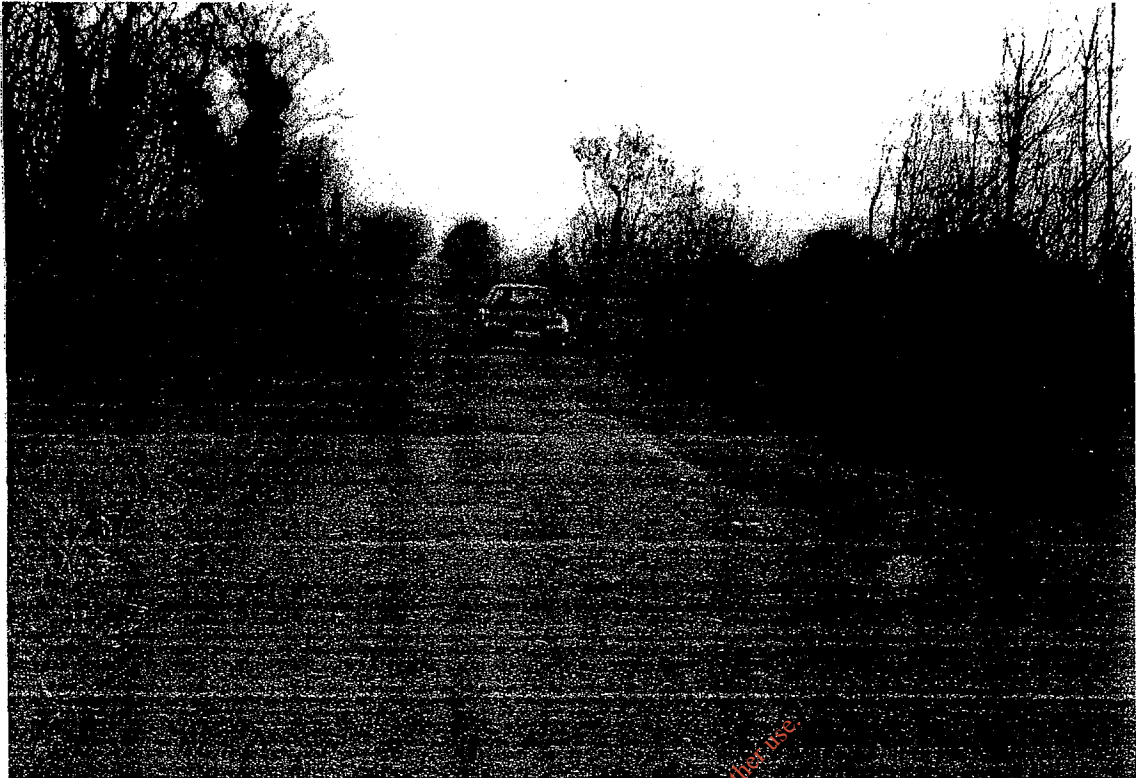
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P. 1.



Westmeath Environmental Group

Hightown, Coralstown, Mullingar, Co. Westmeath Tel: 044-74798 FAX 044-74798

The Secretary,
Environmental Protection Agency,
Johnstown Castle Estate
Co. Wexford.

Re: Application for a Waste Licence for a Composting Facility
as Pass of Kilbride, Milltownpass, Co. Westmeath by Thornton's
Recycling Centre Ltd.

Dear Sir / Madam,

In my capacity as Chairperson of the Westmeath Environmental Group I wish to express our very serious concerns regarding the granting of a Waste Licence.

1. The proposed facility is too big. It would be processing 90 thousand tonnes of organic waste per annum, a large percentage of which would be cooked food waste. There is no other facility of this size in the country. We have nothing to compare it with. How can we gauge the dangers to people's health and the environment?
2. In the event of accident, freak weather, or malfunction, the potential damage to people's health

and the environment are so much greater because of the sheer size and scale of the proposed operation.

3. The location of the proposed site is in a very rural area and right next door to a National Heritage Bog. The National Parks and Wildlife Service are currently in negotiation with a view to purchasing this for the state.

If the licence were granted, and the Composting operation were to go ahead, there would be a real danger to the flora and fauna of the entire area. [There is even evidence, by droppings, of the Pine Marten being present.]

The potential would exist for a rapid increase in the rat population where there would be an abundance of food and water. Rats are becoming increasingly resistant to poison and would be difficult to control. The laying of poisons has the potential of these entering the food chain of the creatures which already live there and would have a detrimental effect on the entire ecology of the area.

4. There are many water courses in the immediate vicinity of the proposed site. The field boundaries to the N.W. of the site comprise deep drainage ditches which flow in an easterly direction and inter-connect to form a stream which discharges to the Kinnegad River. This stream runs along the N.E. boundary of the site and is fed by the ditch

which lies between the proposed site and the road. There is a lot of surface water moving around and on the site and on to the stream. Two kilometres below the site this feeds into the salmonid spawning beds of the Kinnefad river.

The location and licensing of this proposed composting plant would have a severe and adverse effect on the surrounding protected bog lands and their water courses due to the inevitable pollution that would be created by leachate and liquors produced.

5. The underlying aquifer is acknowledged to be highly vulnerable and it is almost uncontested that pollution of the aquifer and water-bearing superficial deposits could occur as a consequence of pollution from the proposed plant. Such pollution could irreparably contaminate local wells rendering them unsuitable for human and/or farm use.
6. The amount, and effect, of bioaerosols are questionable in the absence of Irish guidance on the siting of compost facilities. The E.I.S. depends on guidance published by the Environment Agency for England and Wales. This does not take into account this island's greater exposure to Atlantic wind and weather.
7. Thornton have stated that waste would be coming from Dublin and other counties outside

P.L.

the Midlands Region. Surely a contravention of the Waste Management Plan for the Midlands Region.

8. The proposed development will involve a major contravention of the Westmeath Development Plan.

For all the reasons given above, I would ask you to reject the application for a Waste Licence for this facility by Thorntons Recycling Centre, Ltd.

Yours Sincerely
Terence Sykes.

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15 DEC 2004

Claremont
Mullingar
County Westmeath

Environmental Protection Agency
Johnstown Castle Estate
County Wexford

10th December 2004

Dear Sir/Madam

I wish to object to the application for a Waste Licence by Thorntons Recycling Centre Ltd. It is my submission that this licence should not be granted.

Since my property, at above address, adjoins the Enniscoffey farm for approximately one mile I have grave concerns over the issue for the following reasons:-

1. The Water Supply for my property comes from a well situated in the Enniscoffey land and flows right through this farm. It has never failed in the past 150 years, and should this supply fail, or become contaminated it would cause very serious problems. It would actually mean that this farm would have to be completely piped with water from an already overloaded supply from Gaybrook tower. Also the existing drinking facilities would need to be fenced off, new drinking troughs fitted and this work done, and ready to switch on, if a failure occurred. Thorntons state that the only water they require is from a well on their property, there is only one spring well, to my knowledge, on their property, the one supplying water here. The expense of this work would be huge plus water rates for the foreseeable future. I also note from reading 2.5.2 Previous Planning Decisions 6th June, 2003, Number 7 that open window composting was applied for in an existing cattle shed. No Statement of any safety precautions regarding spores fumes, or smell was mentioned.
2. Green Waste Facility has to produce a vast amount of spores (aspergillus) which are distributed by wind and air currents distance variable. These spores are very unhealthy and are endemic with compost manufacturing. As I have a Stud Farm here, I probably would have to close the Stud Farm as my bloodstock would be badly effected. See Veterinary Report from a leading Equine veterinary Surgeon enclosed.
3. Part of this farm is designated by Ducas (N.H.A.) and all of it is in R.E.P.S. for the past seven years so therefore the noise, fumes, smells, spores, dust would be contrary to the objectives of R.E.P.S. and N.H.A.
4. As is well known only property near a facility of the kind applied for by Thorntons, is hugely devalued and as there are 380 acres plus yard and residence in Claremont, you can only imagine the immense devaluation loss here for me. This is probably why Thorntons have avoided making any contact with me to date either in person, by phone or letter in contrast to their Statement in their 2nd July Newsletter, re "Thorntons Recycling" intends to be a good neighbour within the Community.

5. Their Statement about "Tree Screening" around the proposed site at Pass of Kilbride, Milltownpass (to give it the correct address) is just fantasy, one cannot see the "screening" trees in the grass surrounding the site.
6. One only has to read of the past behaviour of Thorntons, well documented in the press, to see the type of firm we are opposing. In the Irish Independent of 2nd August re Thorntons Dunboyne Plant, Mr. Conor Walsh brazenly stated "We had always intended operating a bigger facility" so one must have grave misgivings about the real intentions regarding Pass of Kilbride, Milltownpass, and Enniscoffey, Gaybrook.

Yours sincerely,


.....
Cecil Ronaldson.

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M O' DONOGHUE MVB MRCVS

2 Hillview, Ballinderry, Mullingar, Co Westmeath

Tel: 044 48142 Fax: 044 84298

To Whom It May Concern:

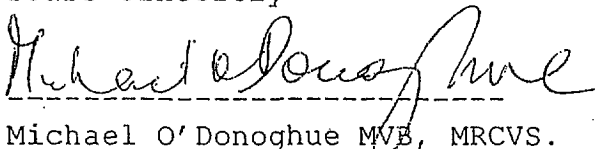
Dear Mr Ronaldson,

I would like to make the following observations about the Kilbride Compost Manufacturing facility.

1. As with any composting process some dust will be produced (page 2 of newsletter July 2004).
2. This dust will contain some Aspergillus spores.
3. Aspergillus spores are a well recognised cause of Equine Respiratory Disease.
4. You are a direct neighbouring farm to this proposed facility.
5. The level of risk to your bloodstock would depend on factors such as:
 - (a) The amount of dust / spores produced.
 - (b) Prevailing wind conditions.
 - (c) Age of bloodstock - younger horses are more at risk.
 - (d) Distance from facility - you are a direct neighbour.

In conclusion it is impossible to say that this facility will **not** pose a risk to your bloodstock. In my opinion significant dangers to your bloodstock breeding business are involved.

Yours sincerely



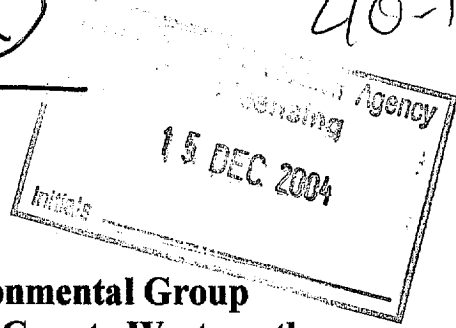
Michael O'Donoghue MVB, MRCVS.

Date 29.07.04

MICHAEL O'DONOGHUE
M.V.B. M.R.C.V.S.
MULLINGAR
CO. WESTMEATH

Sub(2)

210-1



**Milltownpass Residents and Environmental Group
C/o Hightown, Coralstown, Kinnegad, County Westmeath**

The Secretary,
Environmental Protection Agency,
Johnstown Castle Estate,
County Wexford.

5th December 2004

Re: Waste Licence Application by Thornton's Recycling Centre Ltd
for a Composting Facility at Pass of Kilbride, Milltownpass,
County Westmeath.

Dear Sir/Madam,

I enclose our observations/submissions on the application by Thornton's Recycling Centre Ltd for a Waste Licence for the proposed Composting Facility.

Our main document entitled Submissions/Observations to the E.P.A. is our response to the application. Supporting documents (appendices) are enclosed.

We have studied the Waste Licence Application and, with the documents we provide, we ask you to refuse this Licence. If you decide to hold an oral hearing, we request that we be heard at that hearing.

Yours sincerely

Richard G Murphy

Enclosed also:

Submission by: Veronica Lynam, Chairperson.
Westmeath Environmental Group.

by: Cecil Ronaldson.
Neighbouring Stud Farm.

**Submissions/Observations to the E.P.A.
December 2004**

**Milltownpass Residents and Environmental Group,
C/o Richard Murphy, Hightown, Coralstown, Kinnegad,
County Westmeath.**

The Secretary,
E.P.A.,
Johnstown Castle Estate,
County Wexford.

SUBJECT: Submissions/Observations in opposition to the granting of a Waste Licence to Thorntons's Recycling Centre Ltd for a Composting Facility at Pass of Kilbride, Milltownpass, County Westmeath.

These are made on behalf of, and by the Milltownpass Residents and Environmental Group, a local body with an elected committee and with wide public support from local residents.

Supporting documentation is attached in appendices A to C, which are referred to in the main text. We further point out that planning permission has been refused by Westmeath County Council on three grounds.

1. "The proposed development will involve importation of organic waste from outside the Midland Region and thereby contrary to Midlands Waste Management Plan".
2. "The existing road network serving the site, being bog rampart for some part, is substandard and it is the policy of the Development Plan (5.3.9.) to restrict permitted development to housing development for a strictly limited number of family members, where access to alternative public roads is not available. The proposed development being industrial in nature would not come within the foregoing policy objective and is not considered to be in accordance with the proper planning and sustainable development of the area".
3. "Notwithstanding existing concerns regarding environmental impact, including impact to the ground waters, ecology and habitats of the area, including the adjacent designated N.H.A., Milltownpass Bog, that the information submitted has not adequately addressed, the proposed development is considered contrary to the policies and objectives of the Westmeath County Development Plan 2002 which discourages major industrial projects in the country side, policy reference 5.3.8.5. refers."

We totally support the County Council in its decision to refuse Planning Permission on the above grounds and wish them to be mentioned in these submissions/observations against the granting of a Waste Licence.

We further submit that the E.I.S. submitted by Thornton's Recycling Centre Ltd in support of their application is both flawed and incomplete as is shown in our Appendix A. We contend that the E.I.S. does not unequivocally show that the proposed development:

- (a) Will not cause injury to the health and well-being of persons living in the area.
- (b) Will not cause the pollution of air, surface water, water courses, or groundwater, with injurious consequences for humans, for flora and fauna, and for the farming community in the area.
APPENDIX A.
- (c) Will not generate an increase in vermin – with the added effect that pesticide control will have on local fauna.
- (d) Will not damage the wells of the households in the area.
APPENDIX A.
- (e) Will not, by watering to control dust, or as a result of flooding, damage the water courses during construction, and by daily traffic.
- (f) Will not endanger the underlying aquifer, classified as LG/E – a locally important sand/gravel aquifer when the ground water is extremely vulnerable to contamination.
APPENDIX A.
- (g) Will not endanger the bordering stream which is an important feeder stream for the Kinnegad River, and is part of the salmonid spawning area of that river.
APPENDIX A.
- (h) Will not guarantee to a sufficient degree that the process will contain all odours.
- (i) Will not guarantee that the screen of trees will be adequate to prevent noise pollution in the near future.

It is stated that “all material will be delivered to the facility in sealed containers” and that traffic will be directed to move to and from the site via the N.6. turn-off. However, no licensing regime is indicated to regulate these collectors/transporters. There would be no redress should these vehicles cause pollution by spillage around the proposed site. There is also no guarantee that the carriers under commercial and time pressures, will confine themselves to the route indicated.

There is insufficient evidence that the provision for run-off water from the concreted base area will provide adequate protection for local water courses. The same is true for leachate. APPENDIX A.

The amount of bio-aerosols created, and their effects, are questionable. In addition, in the absence of Irish guidelines on the siting of composting facilities, the E.I.S. depends on those published by the Environment Agency for England and Wales. These do not take into account Ireland's greater exposure to Atlantic wind and weather.

The proposals in the E.I.S. and elsewhere for the development of the Killucan road are purely aspirational. The existing road is totally inadequate for the traffic proposed. APPENDIX B. and APPENDIX C.

The site of the proposed facility is adjacent to an area designated as a National Heritage Area. This is a site of considerable conservation significance and is very vulnerable to any disturbance.

The characteristics of the proposed site, even allowing for the mitigation measures proposed by the applicant company, indicate that the proposed facility poses a serious environmental, health, and social risk to the local residents, local village and the surrounding rural communities.

On surface water, the E.I.S. indicates that "water quality sampling and analysis both on and off site and an assessment of on-site streams and ditches to determine water levels and flows" was carried out. The dates given indicate that this was carried out on two dates (given) which were during the driest period that local residents can recall for the last twenty years.

The section on Flora and Fauna states that "The site is not under any designation as per the E.U. Natural Habitats Regulations 1997 (S.1.No 94 of 1997). Nor is the site registered for containing any species under the Wildlife (Amendment) Act, 2000". While both statements are true, as things stand, they fail to reveal that the site is a hunting ground for the Barn Owl and the Pine Marten (both most likely based in the Milltownpass Bog N.H.A. immediately adjacent). This is vouched for by the local Wildlife Ranger and the local residents. The site itself is a well-known breeding ground for frogs. As all who use the road regularly know, the frogs can be almost a hazard on the road during the spawning season.

With regard to the Waste Licence Application by Thornton's Recycling Centre Ltd, may we point to Attachments E5 and to Attachment H.? Under the heading "water" in E.5. there is a reference to calculations in Chap.10 and Appendix 10.1 of the E.I.S. We would enquire as to the validity of these calculations as there is no current model to give them credence. The same is true for the claim made in Attachment H. (Emission points).

In Attachment J. Environmental Monitoring, we note that the section J.1. [Dust, PM10 and Bioaerosol] names no specific authority and no independent monitor. In J.3. [Groundwater] we feel that the monitoring offered is crude and not frequent enough. In J.4. [Air] the monitoring, apart from "odour and condition and depth of

biofilter", is to be bi-annual. This is not sufficient. In J.9. [Surface water] this crucial area is left to the site Environmental Manager. There is no mention of independent monitoring and there is no mention of crucial downstream monitoring.

It is our submission and observation that the Waste Licence Application by Thornton's Recycling Centre Ltd. is flawed and inadequate, as is the E.I.S. which supports it and that the application should be refused.

In support of our position we enclose --

APPENDIX A. -- an assessment by Minerex Environmental Ltd., Taney Hall, Eglinton Terrace, Dundrum, Dublin 14.

APPENDIX B. -- a summary of key observations by Graham Walmsley, Civil Engineer, Thomastown, Killucan, County Westmeath.

APPENDIX C. -- a series of photographs which show the state of the road proposed as access to the site.

We contend that application made to you by Thornton's Recycling Centre Ltd. and the E.I.S. put forward in support of this application must be regarded as seriously in question arising out of these appendices which point to flaws within the application as well as the need for further investigation.

Signed: _____

Richard G. Murphy

Richard G. Murphy
Westmeath Environmental Group

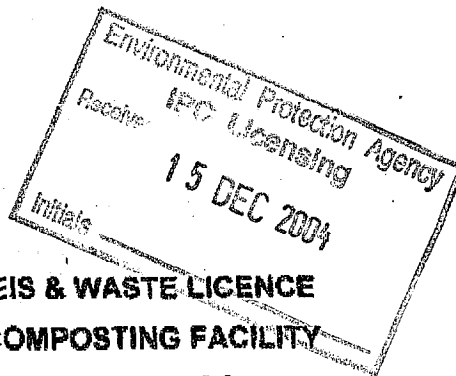
For and on behalf of:

Milltownpass Residents and Environmental Group,
Hightown,
Coralstown,
Kinnegad,
County Westmeath

Date: _____

5.12.04

APPENDIX A



**ASSESSMENT OF ASPECTS OF EIS & WASTE LICENCE
 APPLICATION FOR PROPOSED COMPOSTING FACILITY
 AT PASS OF KILBRIDE, MILLTOWNPASS, CO.
 WESTMEATH**

MEL Report Ref. 1690-049.doc

Date: 15/11/04

Confidential Report To:

**Westmeath Environmental Group
 Hightown
 Coralstown
 Mullingar
 Co. Westmeath**

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Report submitted by :

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 Dundrum, Dublin 14
 Ireland
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 Fax.: +353 (0)1-296 4436
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Issued by :

 Stephen Peel M.Sc.
 Chartered Engineer

Reviewed by :

 EurGeol Cecil Shine M.Sc. PGeo
 Project Director

Westmeath Environmental Group
Assessment of EIS & Waste Licence Application
Proposed Composting Facility, Pass of Kilbride

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Westmeath Environmental Group
Assessment of EIS & Waste Licence Application
Proposed Composting Facility, Pass of Kilbride

1. Introduction

Minerex Environmental Ltd has been requested to review some aspects of the EIS and Waste Licence Application by Thornton's Recycling for a Proposed Composting Facility at Pass of Kilbride. This report deals with Chapters 3 to 11 of the EIS the main emphasis on Chapters 3 (Needs and Alternatives), Chapter 4 (Project Description), Chapter 10 (Surface Water) and Chapter 11 (Geology and Hydrogeology).

2. Needs & Alternatives (Chapter 3)

2.1 Alternative Locations (3.4.3)

The merits of the site at Pass of Kilbride as a suitable location for the proposed facility are discussed however the discussion does not include or indicate whether alternative locations were considered prior to the planning application. This is despite the fact that the "Guidelines on the information to be contained in Environmental Impact Statements, EPA, 2002" state that "the presentation and consideration of the various alternatives by the applicant is an important requirement of the EIA process. In this regard "alternatives" refer to locations, designs and processes.

It is stated in section 3.4.3 that "the site was selected due to its rural location, synergies with local peat extraction, low density of residential dwellings in the vicinity, excellent screening and its proximity to the National Road Network". This section of the EIS continues by addressing peat extraction and dwelling density in the vicinity of the subject site and then addresses the latter in general terms with regard to fungal spores. There is, however, no mention of alternative locations.

It is also stated in 3.4.3 that "a critical factor in the location of the site was the fact the general area has a history of peat extraction and the compost product will replace peat as a growing medium in horticulture". This however is a false proposition. The implication seems to be that the compost product would be used solely in the "general area", but this could not be correct, the product would surely be for nation-wide distribution. This being the case, the proposed development would not be critical to the subject site but could be at any suitable location in the Midlands.

It is also stated that the site was purchased "with the intention of applying for planning permission for a composting facility situated in the centre of the total landholding". The "Do-nothing Alternative" is addressed in section 3.4.5 and it is stated that "if the proposed facility at Kilbride is not developed, then organic wastes arising in Westmeath and the surrounding counties, ... will require disposal at other facilities in the area". This statement points directly at the need to look at alternative sites in the region and the only interpretation that can be taken is that an investigation of other sites has not been undertaken by the applicant. If it had, the applicant would surely have submitted information to demonstrate that the Kilbride site was the best available site.

Westmeath Environmental Group
Assessment of EIS & Waste Licence Application
Proposed Composting Facility, Pass of Kilbride

It is further stated in section 3.4.3 that "these (types of) facilities should ideally be located in remote areas where the health risk is limited to the workforce ... ". The initial intention therefore seems to have been to locate the facility where it might have the least impact in all respects which includes the distance from the public road frontage. However, the location of the proposed facility was changed after it was found that the subsurface conditions near the centre of the landholding were unfavourable. The location that is currently proposed for development is closer to the road and closer to residential dwellings, therefore it must be less suitable than the initially intended location. Being closer to the public road, it would have a large road frontage of some 270metres, therefore the proposed facility would not have the "excellent screening" that is claimed in section 3.4.3.

With regard to site selection for developments such as the current one it is normal practice to employ geographic information systems (GIS) to identify those sites that are most appropriate for particular developments. This system of analysis takes account of all relevant factors, such as natural features, landuse and infrastructure, and potentially suitable sites can be identified or eliminated with reference to prescribed criteria. After assessing all available and potentially suitable sites in a region in this way, a shortlist of a few sites, that are potentially suitable for the siting of the proposed development, would be identified. Those shortlisted sites would then be further evaluated by consideration of all relevant factors and after detailed site investigation. A rating would then be assigned to each site for all factors, with weightings applied where necessary in recognition of the importance of each factor. Comparative "scores" would then be obtained to identify a single preferred site. This is the accepted procedure in the selection of developments such as landfill sites. Unless such a procedure is undertaken it is not possible to identify the best potential site with regard to all relevant factors.

It is clear that this procedure was not undertaken for the current proposal and this absence of a site selection procedure effectively means that the proposed development at the subject site is invalid. There may be many sites in counties Longford, Westmeath, Offaly, Laois and North Tipperary that are more suitable than the subject site with regard to, for example, remoteness from dwellings, groundwater vulnerability, proximity to source materials and proximity to product markets.

3. Project Description (Chapter 4)

3.1 Environmental Impacts (4.7)

3.1.1 Noise

It is noted that it is admitted that local residents could experience nuisance from noise generated on site during construction. No details are provided on the extent or time at which the noise nuisance may be prevalent, which leads to an incomplete assessment of this impact.

Westmeth Environmental Group
Assessment of EIS & Waste Licence Application
Proposed Composting Facility, Pass of Kilbride

3.1.2 Traffic

It is stated that during construction the site would be operated until 20:00hours Monday to Friday and that in operation the facility would operate until 18:00hours Monday to Friday therefore artificial lighting would be used after daylight hours in winter months. It is stated that "lighting will be designed to minimise the effect of light spillage beyond the site boundaries" ... For the same reason, the frequency of use of the local roads would be increased during those hours of darkness.

3.2 Groundwater & Surface Water Management (4.9)

It is stated in section 4.9 that a proprietary treatment system to treat domestic effluent will be installed on site and that it "is not expected to have a significant impact on groundwater". It is clear from this statement that the applicant is not giving an assurance that there would not be a significant impact on groundwater. This is unsatisfactory; the applicant must be able to give such assurance if the proposal is to be acceptable in this regard.

Figure 4.2 shows two "unpaved areas" in the southern part of the facility area but no explanation is given as to the purpose of these areas. The applicant should give an explanation of the purpose of these areas to confirm that their proposed use will not impact the groundwater, and explain how surface runoff from adjacent paved areas will not discharge into the unpaved areas, if that is the intention.

4. Human Beings (Chapter 5)

It is stated in section 5.2 that there are "no houses within 600m of the site boundary", but this contradicts the statement in section 4.2 that the nearest dwelling is 510m northeast of the proposed site boundary. Figure 5.1 indicates that the lesser figure is more accurate.

5. Air Quality (Chapter 6)

Dust monitoring was carried out at four locations on the site that was initially proposed for development (D1 to D4); these are approximately 1Km west from the currently proposed location. It is stated in section 6.4.3 of the EIS that two additional monitoring locations (D5 and D6) were subsequently used on the currently proposed location and that results would be included in the waste licence application. Bioaerosol results for two unidentified receptors (on-site 1 and on-site 2) are given in Attachment C.1 but no further dust results have been reported so the application contains no baseline dust results for the proposed facility location.

It is noted that four dust monitoring locations were deemed necessary when the initial investigation was carried out on the site to the west of the currently proposed site but that only two locations were used subsequently on the latter site. The applicant should explain why just two monitoring locations were considered necessary in this case when four had been used on the earlier site.

As in the EIS, the WLA refers to dust monitoring data most of which were obtained c.1Km from the subject site.

6. Noise (Chapter 8)

It is noted that four noise monitoring locations (N1 to N4) were deemed necessary when the initial investigation was carried out on the site to the west of the currently proposed site but that only two locations (N5 and N6) were used subsequently on the latter site. The applicant should explain why just two monitoring locations were considered necessary in this case when four had been used on the earlier site.

In the WLA it is stated that proposed "mitigation measures will ensure the potential noise impact from the site will not have a significant impact on local residents" however it is not possible to give an assurance on this matter. The effectiveness of mitigation measures could only be assessed after the fact.

As in the EIS, the WLA refers to noise monitoring data most of which were obtained c.1Km from the subject site.

7. Traffic (Chapter 9)

7.1 Amounts of Waste and Product

In section 9.4.1 it is stated that the annual amount of product would be 50,000tonnes. Given an intake of 90,000tonnes a year the applicant should provide figures indicating how the net annual amount of 40,000tonnes is consumed for reasons of clarity.

7.2 Road Widening

The proposed access to the site (stated in the EIS Section 9.9) requires that the public road between the Pass of Kilbride and the proposed site entrance should be widened by 1.0 to 1.3metre, and that the widening should occur on one side only. However no consideration seems to have been given to the fact that Milltownpass Bog, a National Heritage Area protected under the European Habitats Directive (Ref. 1) lies immediately to the northwest of the road and should therefore not be encroached upon. In this regard, Figure 9.1 in the EIS, showing the access road from the Pass of Kilbride, should identify the boundary of the NHA. The area of road widening recommended (section 9.10 in the EIS) should also be highlighted, and any potential impacts on the NHA be assessed and documented in the EIS.

8. Surface Water (Chapter 10)

Westmeath Environmental Group
Assessment of EIS & Waste Licence Application
Proposed Composting Facility, Pass of Kilbride

8.1 Surface Water Flow

In section 10.2 it is stated that "all relevant calculations are included in Appendix 10.1", however not all calculations are given, for example, using the rational method reference is made to peak discharge estimation for storms of various intensity and duration but calculations supporting this claim are not submitted. Also, it is stated that calculations for sedimentation ponds are included in Appendix 10.1 but there is no reference to these in Appendix 10.1 nor in the text of the EIS. Some parts of Chapter 10 and Appendix 10.1 lack clarity and it is difficult to follow how decisions were arrived at, for example how the figure of 955m³ was calculated for excess runoff from a 20-year return period 24hour rainfall event. It would assist an evaluation of the EIS if the way in which the various figures were obtained were transparent.

The term Standard Average Annual Rainfall (SAAR) has been used in formulae to estimate stream flow in Appendix 10.1 and section 10.6.3, and a value of 841mm has been used, stating that the value is "per Met Eireann data". However the method by which the value was obtained is not given and an enquiry with Met Eireann has revealed that the term SAAR is not one that is used by Met Eireann.

A 20-year return period rainfall event has been considered for the soakaway but a 50-year event would be more appropriate and more normal to use in such a calculation. The soakaway has been designed to accommodate the excess runoff from a 20-year return period 24hour rainfall event with only a little extra capacity on the basis that the stored water would be able to infiltrate into underlying natural formations. However this proposal has been made without determining the infiltration capability of the formations at the location; the nearest testing was carried out more than 100m from the centre of the proposed soakaway (percolation area). Therefore the potential performance of the soakaway and the consequent impact on the underlying groundwater body is not known.

An oil/water separator has been proposed for installation on the surface water discharge line but the size and type of separator has not been specified.

8.2 Surface Water Monitoring

Monitoring location SW4 is proposed downstream of the two proposed discharge points on the tributary to the Kinnegad River on the northeastern boundary of the proposed site (Figure 10.1). However a deep drainage ditch runs between the site and the public road along the southeastern site boundary (section 10.5.1) and discharges to the tributary of the Kinnegad River downstream from SW4. Therefore, if contaminants were to enter this deep ditch, by way of baseflow from the site, it could not be detected. A monitoring location should therefore also be proposed in the ditch just upstream from the confluence with the tributary to the Kinnegad River.

Given that monitoring location SW4A is the only one downstream from the proposed facility a baseline sample should have been taken on more than one occasion. The quality of the water may vary seasonally, therefore it would have been prudent to take samples at different times of the year. The data submitted may be inadequate to characterise the existing environment adequately.

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It is noted from the WLA that no assurance is given that leachate and other elements will not impact on the surface water environment, rather that there would be an impact.

8.3 Vulnerability of Salmon Fisheries

Discharge of surface water runoff from the proposed composting facility is proposed to be into a stream that is the source of the Kinnegad River, (as indicated on MAP 1, Hydrometric Network Water Level Recorders, EPA, July 1995). The risk of either sediment loading, leachate, oils or sewage reaching the Kinnegad River must be considered in the event of failure of surface water treatment processes. Kinnegad River is a salmon spawning ground, thereby protected under Annex II of the European Habitats Directive (Ref 1). A full assessment of the potential effects of the above listed contaminants on the fishery should be undertaken and the applicant should submit proposed mitigation measures.

9. Geology and Hydrogeology (Chapter 11)

9.1 Hydrogeology (11.3.4)

Some of the statutory limits given in Appendix 11.7 are incorrect.

Attachment H of the WLA fails to identify the bunded soakaway for excess surface runoff as an emission point. In view of the fact that infiltration to ground is proposed in the bunded storage area, it is suggested that an additional groundwater monitoring point should have been proposed between the bunded area and the nearby stream.

9.2 Aquifer Classification and Vulnerability Rating

It is stated that the gravel stratum under the site forms part of a Locally Important Sand/Gravel Aquifer (Lg) and that it has an Extreme vulnerability rating with regard to the possibility of contamination. The results of site investigations at the site, in the form of trial pitting and borehole drilling, show that the top of the gravel aquifer is shallower beneath the eastern part of the site. From the limited groundwater level data in the EIS it is concluded that the thickness of unsaturated aquifer in that area is less than 1.5m and this would make groundwater at this location particularly vulnerable.

9.3 Groundwater Protection Response

The groundwater protection response has been assessed without fully identifying all the hazards on site that are identified in Chapter 4. Consequently a response rating has been provided for the wastewater treatment system for site employees but not for the development as a whole. For example, the presence of leachate in the recycling process is a hazard and that should also be considered and given a response rating. The

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waste related activities of the site are such that a response rating based on the Geological Survey of Ireland "Groundwater Protection Responses for Landfills" is the most applicable, as it is relevant to the potential leakage of leachate into the groundwater. This would give a rating of R3² which states:

Not generally acceptable unless it can be shown that:

There is a minimum consistent thickness of 3 metres of low permeability subsoil present;

There will be no significant impact on the groundwater; and

It is not practicable to find a site in a lower risk area.

These conditions would need to be satisfied before the proposed development could be adequately assessed.

A groundwater risk assessment of the composting facility operation should be undertaken whereby all hazards are identified. This should include all substances imported to and exported from the composting facility, as well as discharges related to sewage treatment for on-site personnel. Groundwater response ratings should be determined for each hazard identified.

9.4 Vulnerability of Underlying Aquifer

It is stated in section 11.7 that impacts on the groundwater are predicted from the proposed facility.

It is also stated that the top of the gravel aquifer is generally between 1.2 and 3.0 metres below ground level (mbgl) and the site investigation logs in Appendices 11.1 & 11.2 show that BH2 is the only site of 9 boreholes and 11 trial pits which shows a till cover to 3m or greater. This indicates that the protective cover is typically less than 3m in thickness.

High permeability in the gravel aquifer, measured at 777m/d, and lack of any significant drawdown supports the theory that there is a significant groundwater body beneath the site, which may be more extensive than indicated by the site investigations. It is typical for glacial tills to have lenses of sands and gravels that are discontinuous but hydraulically connected. This continuity can be both vertical and horizontal; 4 of the 9 site investigation boreholes show clay layer below the gravels at between 9.7 and 10.4m below ground level, therefore the depth of the gravels remains undetermined at five of the nine locations drilled across the site. The status of hydraulic continuity/discontinuity between the gravel aquifer and the bedrock aquifer has not been determined in the EIS. Therefore there is a potentially significant risk to the underlying overburden and bedrock aquifers, notwithstanding the use of concrete hard standing.

Two of the households in the north of the locality have shallow wells (3.9m and 1.2m deep) from which domestic supplies are abstracted and the gravel aquifer from which the groundwater is taken may be in hydraulic continuity with that beneath the site.

The location of the proposed facility in the vicinity of a major fault, as indicated in Figure 11.2 in the EIS, also contravenes the principles of Best Practicable Environmental Option (BPEO) as referred to in Chapter 3.4.1

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of the EIS. Such a fault and associated fractures along the shear zone in the bedrock is potentially an area of higher bedrock permeability and may constitute a higher risk area.

The wider extent of the gravel aquifer beneath the site should be considered and possibly investigated using geophysics and/or local well audits and associated drill records so that the risk to all groundwater users can be assessed.

9.5 Vulnerability of Local Wells

A site-specific well audit is not reported in the EIS and it is stated in section 11.4 that there may be domestic abstraction wells approximately 510m from the site, implying that such an audit was not undertaken. Nine houses are within 1km of the site, on the northeast side, and are all on private wells according to communication from the locals. Four of these houses are within 650m of the site boundary. In view of the fact that the proposed development is located on a highly permeable locally important sand/gravel aquifer that is extremely vulnerable to contamination these groundwater supplies are potentially at risk. Although there is a stream between the site and the houses to the northeast of the site, which may act as a boundary to groundwater flow, the status, depth and water-bearing formation of each of the local wells should be determined as a matter of course. There is also a potential for contaminants to enter the aquifer via discharges to the stream.

Summarising the data above, there is insufficient protective cover over the underlying groundwater bodies at the site at the Pass of Kilbride and according to the guidelines of the Geological Survey of Ireland (*"Groundwater Protection Schemes, Geological Survey of Ireland, 1999"*) the site is not generally acceptable, unless the risk to groundwater related receptors can be proven to be the lowest possible for this type of development.

10. Contingency Arrangements

Section 11 of the WLA (Contingency Arrangements) fails to give information on staff training and does not give copies of the relevant recording forms for the different procedures.

11. References

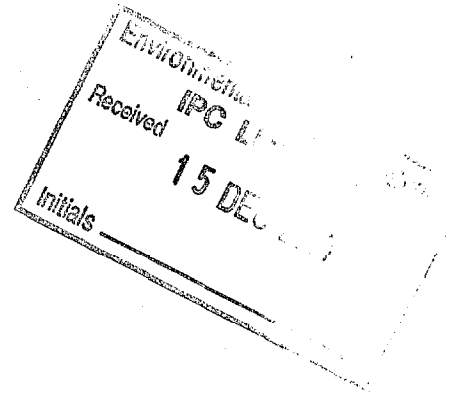
1. SI No. 94/1997: European Communities (Natural Habitats) Regulations, 1997

APPENDIX B

Proposed Composting Facility

Pass of Kilbride

Key Observations



1.0 Choice of Site Location

1.1 The selection of a site for composting which by its nature has an impact upon the environs of the Pass of Kilbride has to be based upon sound technical and engineering criteria.

1.2 It is considered that more appropriate sites have not been considered and that there are fundamental reasons why this development should not receive planning permission in its current form. These are listed under several headings and are not in any order of priority

2.0 Access and Roadway

2.1 Access to the proposed site is along the old bog road, which runs from the Pass of Kilbride to Correlstown.

2.2 The bog road as can be seen from observation was not constructed to carry heavy goods vehicles and the road will ultimately deteriorate and the formation will fail. This will create a hazard to those inhabitants of the area who commute to Miltown Pass and the surrounding areas.

2.3 The bog road which is derestricted is also too narrow for the use of regular heavy goods vehicles which will travel to and from the site via the N6 and the road is unsuitable and the potential for accidents would be greatly increased.

2.4 The developer proposes to use this access and during winter months this area of open land is subject to black ice. The proposed increase in heavy goods traffic in winter conditions would not be acceptable from a health and safety case risk analysis for the change in use of this road.

2.5 There are no street lights on this road and during periods of darkness and in winter months, with the possibility of icing, the use of this road by a continuous stream of refuse vehicles interfaced with cars taking children to school would create an unacceptable the risk of accidents to local residents and could not be supported by a road safety case.

3.0 Change of Land Use (Agricultural to Industrial)

3.1 The proposed site falls within a rural area having protected bog lands and subject Heritage Guidelines. It is not considered that this proposed industrial unit meets the Planning Criteria for this area.

4.0 Contamination of Water Courses and Aquifer

4.1 The location of this proposed composting plant will have a severe and adverse affect on the surrounding protected bog lands and watercourses due to the inevitable pollution that will be created by Leachate and liquours that will be produced by this plant

4.2 The aquifer is acknowledged to be highly vulnerable and it is incontestable that pollution of the aquifer and water bearing superficial deposits will occur as a consequence of pollution from the plant. The result of such pollution will irreparably contaminate local wells and the aquifer rendering them unusable for inhabitants and farm use.

5.0 The Environment

5.1 There is concern that the leachate and emissions from the Plant will have a long term adverse effect upon the protected bog lands, flora and fauna. Certainly it will affect a change on the equilibrium of these wet lands.

5.2 Where will the Leachate be transported to and how will it be processed.?

6.0 Vermin

6.1 The potential for a rapid increase in the rat population of the area where there will be an abundance of food and water should not be underestimated. Rats are becoming increasingly resistant to poisons and will be difficult to control.

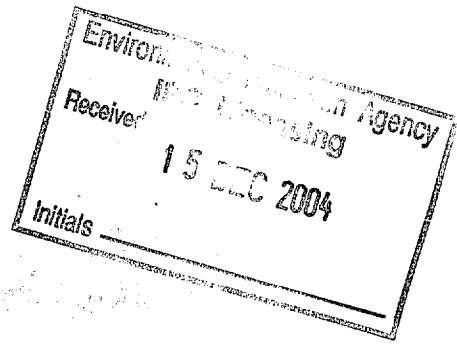
6.2 The laying down of poisons and the potential to enter the food chain of those animals that inhabit the bog will have a changing effect upon the ecology of the area.

7.0 Health of the Community

7.1 The health of workers and the local community within a prescribed area would require to be monitored with regard to the effects of pollution particularly those chemicals that are carcinogenic.

8.0 Safeguards

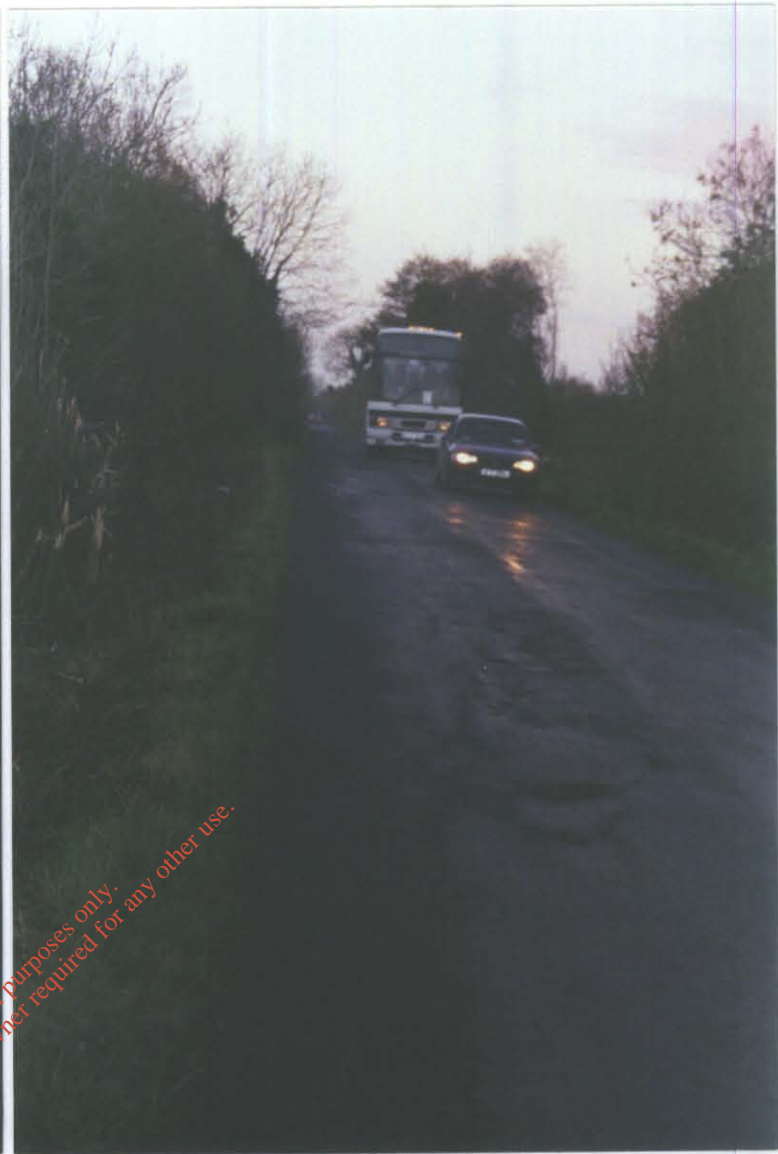
8.1 What safeguards are proposed by the developer in the event of this venture being unsuccessful and abandoned in the future? Is the developer willing to enter into a guarantee bond for pollution and the decommissioning of the plant and its return to its original status should this venture be unsuccessful



APPENDIX C.

**The road proposed for access
to the site for proposed
Composting Facility
by Thornton's Recycling Centre Ltd.
Pass of Kilbride
Milltownpass
County Westmeath**

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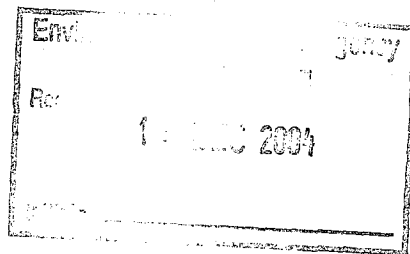




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P. 1.



Westmeath Environmental Group

Hightown, Corastown, Mullingar, Co. Westmeath Tel: 044-74798 FAX 044-74798

The Secretary,
Environmental Protection Agency,
Johnstown Castle Estate
Co. Wexford.

Re: Application for a Waste Licence for a Composting Facility
as Pass of Kilbride, Mulltownpass, Co. Westmeath by Thorntons
Recycling Centre Ltd.

Dear Sir / Madam,

In my capacity as Chairperson of the Westmeath
Environmental Group I wish to express our very serious
concerns regarding the granting of a Waste Licence.

1. The proposed facility is too big. It would be processing 90 thousand tonnes of organic waste per annum, a large percentage of which would be cooked food waste. There is no other facility of this size in the country. We have nothing to compare it with. How can we gauge the dangers to peoples health and the environment?
2. In the event of accident, freak weather, or malfunction, the potential damage to peoples health

and the environment are so much greater because of the sheer size and scale of the proposed operation.

3. The location of the proposed site is in a very rural area and right next door to a National Heritage Bog. The National Parks and Wildlife Service are currently in negotiation with a view to purchasing this for the state.

If the licence were granted, and the Composting operation were to go ahead, there would be a real danger to the flora and fauna of the entire area.

[There is even evidence of droppings, of the Pine marten being present.]

The potential would exist for a rapid increase in the rat population where there would be an abundance of food and water. Rats are becoming increasingly resistant to poison and would be difficult to control.

The laying of poisons has the potential of these entering the food chain of the creatures which already live there and would have a detrimental effect on the entire ecology of the area.

4. There are many water courses in the immediate vicinity of the proposed site. The field boundaries to the N.W. of the site comprise deep drainage ditches which flow in an easterly direction and inter-connect to form a stream which discharges to the Kinnegad River. This stream runs along the N.E. boundary of the site and is fed by the ditch

which lies between the proposed site and the road. There is a lot of surface water moving around and on the site and on to the stream. Two kilometres below the site this feeds into the salmonid spawning beds of the Kinnegad River.

The location and licensing of this proposed composting plant would have a severe and adverse effect on the surrounding protected bog lands and their water courses due to the inevitable pollution that would be created by leachate and liquors produced.

5. The underlying aquifer is acknowledged to be highly vulnerable and it is almost uncontestable that pollution of the aquifer and water-bearing superficial deposits could occur as a consequence of pollution from the proposed plant. Such pollution could irreparably contaminate local wells rendering them unsuitable for human and/or farm use.
6. The amount, and effect, of bioaerosols are questionable in the absence of Irish guidance on the siting of compost facilities. The E.I.S. depends on guidance published by the Environment Agency for England and Wales. This does not take into account this island's greater exposure to Atlantic wind and weather.
7. Thorntons have stated that waste would be coming from Dublin and other counties outside

A.W.

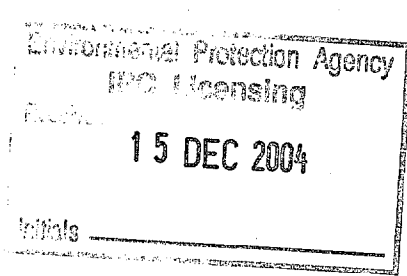
the Midlands Region. Surely a contravention of the Waste Management Plan for the Midlands Region.

8. The proposed development will involve a major contravention of the Westmeath Development Plan.

For all the reasons given above, I would ask you to reject the application for a Waste Licence for this facility by Thorntons Recycling Centre, Ltd.

Yours Sincerely
Alec Sweeney

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Claremont
Mullingar
County Westmeath

Environmental Protection Agency
Johnstown Castle Estate
County Wexford

10th December 2004

Dear Sir/Madam

I wish to object to the application for a Waste Licence by Thorntons Recycling Centre Ltd. It is my submission that this licence should not be granted.

Since my property, at above address, adjoins the Enniscoffey farm for approximately one mile I have grave concerns over the issue for the following reasons:-

1. The Water Supply for my property comes from a well situated in the Enniscoffey land and flows right through this farm. It has never failed in the past 150 years, and should this supply fail, or become contaminated it would cause very serious problems. It would actually mean that this farm would have to be completely piped with water from an already overloaded supply from Gaybrook tower. Also the existing drinking facilities would need to be fenced off, new drinking troughs fitted and this work done, and ready to switch on, if a failure occurred. Thorntons state that the only water they require is from a well on their property, there is only one spring well, to my knowledge, on their property, the one supplying water here. The expense of this work would be huge plus water rates for the foreseeable future. I also note from reading 2.3.2 Previous Planning Decisions 6th June, 2003, Number 7 that open window composting was applied for in an existing cattle shed. No Statement of any safety precautions regarding spores fumes, or smell was mentioned.
2. Green Waste Facility has to produce a vast amount of spores (aspergillus) which are distributed by wind and air currents distance variable. These spores are very unhealthy and are endemic with compost manufacturing. As I have a Stud Farm here, I probably would have to close the Stud Farm as my bloodstock would be badly effected. See Veterinary Report from a leading Equine veterinary Surgeon enclosed.
3. Part of this farm is designated by Ducas (N.H.A.) and all of it is in R.E.P.S. for the past seven years so therefore the noise, fumes, smells, spores, dust would be contrary to the objectives of R.E.P.S. and N.H.A.
4. As is well known only property near a facility of the kind applied for by Thorntons, is hugely devalued and as there are 380 acres plus yard and residence in Claremont, you can only imagine the immense devaluation loss here for me. This is probably why Thorntons have avoided making any contact with me to date either in person, by phone or letter in contrast to their Statement in their 2nd July Newsletter, re "Thorntons Recycling" intends to be a good neighbour within the Community.

5. Their Statement about "Tree Screening" around the proposed site at Pass of Kilbride, Milltownpass (to give it the correct address) is just fantasy, one cannot see the "screening" trees in the grass surrounding the site.
6. One only has to read of the past behaviour of Thorntons, well documented in the press, to see the type of firm we are opposing. In the Irish Independent of 2nd August re Thorntons Dunboyne Plant, Mr. Conor Walsh brazenly stated "We had always intended operating a bigger facility" so one must have grave misgivings about the real intentions regarding Pass of Kilbride, Milltownpass, and Enniscoffey, Gaybrook.

Yours sincerely,


.....
Cecil Ronaldson.

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M O' DONOGHUE MVB MRCVS

2 Hillview, Ballinderry, Mullingar, Co Westmeath

Tel: 044 48142 Fax: 044 84298

To Whom It May Concern:

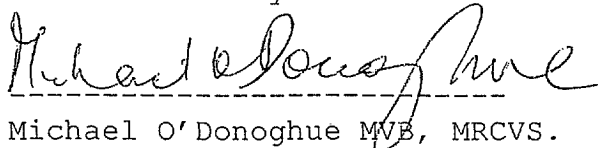
Dear Mr Ronaldson,

I would like to make the following observations about the Kilbride Compost Manufacturing facility.

1. As with any composting process some dust will be produced (page 2 of newsletter July 2004).
2. This dust will contain some Aspergillus spores.
3. Aspergillus spores are a well recognised cause of Equine Respiratory Disease.
4. You are a direct neighbouring farm to this proposed facility.
5. The level of risk to your bloodstock would depend on factors such as:
 - (a) The amount of dust / spores produced.
 - (b) Prevailing wind conditions.
 - (c) Age of bloodstock - younger horses are more at risk.
 - (d) Distance from facility - you are a direct neighbour.

In conclusion it is impossible to say that this facility will **not** pose a risk to your bloodstock. In my opinion significant dangers to your bloodstock breeding business are involved.

Yours sincerely



Michael O'Donoghue MVB, MRCVS.

Date 29.07.04

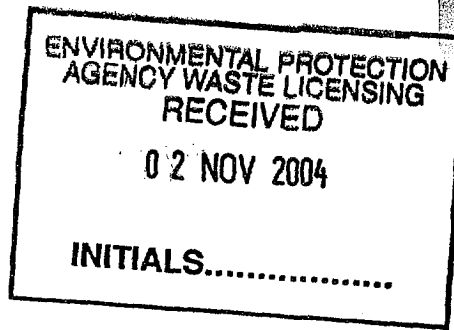
MICHAEL O'DONOGHUE
M.V.B. M.R.C.V.S.
MULLINGAR
CO. WESTMEATH



Eastern Regional Fisheries Board
Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
Our Natural Heritage



Ann Bosley
Programme Manager
Office of Licensing & Guidance
Environmental Protection Agency
PO Box 3000
Johnston Castle Estate
Wexford

29th October 2004

Our Ref: NMcG/Thornton/WasteLicence

**Re Application for waste licence by Thornton Recycling Centre Ltd.
for a proposed composting facility at pass of Kilbride,
Milltownpass, Co. Westmeath (210-1)**

Dear Ms. Bosley

We carried out an inspection of the EIS regarding the above on 26th August last at Westmeath County Council planning offices in Mullingar. We also have a copy of your correspondence to the Department of Marine dated 14 September 2004.

The Eastern Regional Fisheries Board is a Statutory Body which has statutory obligations in regard to the management, conservation, protection, development and improvement of the fisheries within its Region.

Under section 8(a) (1) (i) of the Fisheries (Amendment) Act 1999 *A Regional Board shall in the performance of its duties, have regard to the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems) and as far as possible ensure that its activities are carried out so as to protect the national heritage, within the meaning of the Heritage Act, 1995*

**The Eastern Regional
Fisheries Board**

1-5a Main Street
Blackrock
Co. Dublin

T: (01) 278 7022

F: (01) 278 7025

E: info@erfb.ie

www.fishingireland.ie



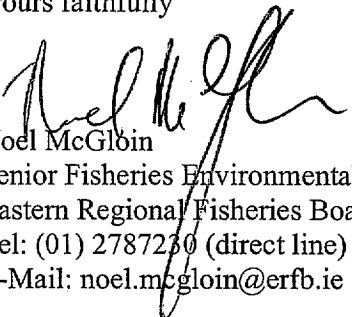
The Board wishes to object to this waste licence on the following grounds:

- The site for this activity is situated adjacent to one of the branches of the Kinnegad River. The Kinnegad River is not 1.5 Km away as stated on page 10-2 of the EIS. There is also a network of surface water channels that are directly linked to the Kinnegad River. The groundwater on site is also directly linked to the Kinnegad River and its site tributaries and the overburden water table lies within 3 m of the surface. Any deleterious discharge from this site would be likely to flow straight to the Kinnegad River and contaminate this habitat.
- The Kinnegad River branch adjacent to this site is a salmonid nursery stream and the main Atlantic Salmon (*Salmo salar*) spawning grounds on the Kinnegad River is situated at Rattin around 2 Km downstream of this site. Upto 30 salmon spawning redds (areas where eggs are laid) occur here each season and these eggs are very vulnerable to water contamination.
- The Kinnegad River is a tributary of the River Boyne and the main channel of the River Boyne is afforded protection under the following EU Directives amongst others. Some or all of these Directives may be breached by this activity at this site.
 - The main channel of the River Boyne has been designated as Salmonid Waters under EC Council Directive 78/659/EEC on the quality of freshwaters needing protection or improvement in order to support fish life as incorporated fully into Irish law by the European Communities (Quality of Salmon Waters) Regulations, 1988 (SI No. 293 of 1988). This places an obligation on Ireland to maintain certain environmental standards in surface waters such as the River Boyne. However, in the last number of years, it has been acknowledged that the River Boyne is under serious environmental threat, mainly due to eutrophication i.e. nutrient enrichment of waters. This has been substantiated by the various reports of the Environmental Protection Agency. Furthermore, the final report of The Three Rivers Project (December 2002) reinforces the facts about this environmental threat. This report is the result of three years work and has major implications for the future management of the River Boyne.
 - Ireland is also in the process of implementing the Water Framework Directive (2000/60/EC). This should impose stricter obligations regarding water quality standards in aquatic habitats.
 - The River Boyne is designated as a proposed Special Area of Conservation (pSAC) since June 2003 under the European Council Directive on Natural Habitats (92/43/EEC) as enacted in Irish law by the European Communities (Natural Habitats) Regulations, 1997. The Atlantic Salmon (*Salmo salar*), Lampern (*Lampetra fluviatilis*) and the White-clawed crayfish (*Austropotamobius pallipes*) are Annex II fish/shellfish species specifically protected under the Natural Habitats Regulations and are present in the River Boyne. Another relevant species protected is the Frog (*Rana temporaria*), which can be a valuable food of fish and is present on site.

- We are concerned about the proposed discharge of treated leachate and stormwater to the Kinnegad River branch as this may have a deleterious effect on the watercourse and on the River Boyne itself in case of an accident or insufficient treatment. We are also reluctant about the effectiveness of reed beds as a proposed leachate discharge polishing system. There are also no specific details regarding the quality and quantity of leachate expected to be produced.

We look forward to a copy of your decision in due course.

Yours faithfully



Noel McGloin
Senior Fisheries Environmental Officer
Eastern Regional Fisheries Board
Tel: (01) 2787250 (direct line)
E-Mail: noel.mcglain@erfb.ie

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