

Sub (36) 167-1

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Lagavooren.
Drogheda.
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ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
21 FEB 2003
INITIALS.....

20th. February, 2003.

Administration,
Waste Management Licensing,
E.P.A. Headquarters,
P.O. Box 3000,
Johnston Castle Estate,
WEXFORD.

Dear Sirs,

Further to my letter of the 12th. Inst. objecting to the granting of a licence to Indaver Ireland for a proposed Incinerator at Carranstown, Duleek, Co. Meath, I omitted the overlay map for the enclosed copy of the Hydrological Resource Protection zones for the area.

South West (or West) of the proposed site there is an old laneway which leads to a number of houses. A stream runs under this laneway, and this stream is a tributary of the river Nanny, which is a salmonoid river. Furthermore there is a stream which flows Northwards along the boundary of the proposed site and thereby flows towards the area of Extreme Vulnerability and in fact comes to within 30m of this Rf/E area (marked GREEN on the map). Did any Co. Meath hydrologist (Oliver Perkins perhaps?) check this out when the application for the incinerator was made by Indaver in June '01 ?
JAV

The spot heights of the "wet ditch" to the west of the site (which Indaver claimed was running Westward,) actually show that the flow is Eastward towards the site! Was this matter pursued at the time of the grant of permission? The most Westerly spot height is 28.94m and the other heights on the map moving East are, 28.75m, 28.63m, 28.58m, and 28.44m.

How can Indaver be allowed to claim that the flow is Westward?

Furthermore there is a wet ditch (or Stream) contiguous with the site and running NORTHWARDS toward the area of EXTREME VULNERABILITY, where the spot heights shown are 31.05m (South most) to 30.98m, 30.66m, 30.34m, 29.68m, and 29.25m back to a "headwall at 29.24m. This headwall is within 30M of the zone of Extreme Vulnerability Rf/E. According to the "Co. Meath Groundwater Protection Scheme" (Oliver Perkins) this puts the proposed Incinerator in an R4 Zone, i.e. NOT ACCEPTABLE for potentially polluting activity!

This area is as you know, on the edge of the "Boyne Valley Bru Na Boinne" and is contiguous with the N.H.A. Duleek Commons, and has a gas main running through the site. What about the fire hazard in the event of an accident? From their own map of the proposed site it is obvious that the main surface water drain from the entire site runs into a point which is within 20M of the area of EXTREME VULNERABILITY! Rf/E.

It must be obvious even to the E.P.A. that in the event of a fire that the use of water-hoses would cause this point to be overloaded and that the excess water would percolate into the area of Extreme Vulnerability which has been adversely affected by the blasting operations in the nearby Platin Quarry, which has increased the fracture /Karst

structure making it even MORE VULNERABLE! This water run-off would of course carry with it all the contaminants (many of which would be toxic i.e. DIOXINS) and this would thereby enter the ground water there to exist for a half-life of 40 years!.

It will be obvious to you, Gentlemen!, that the Rf/E area extends into the field on the West side of the Site and that that field is in all cases 2M and in some cases 9M lower than the proposed site thereby proving (if further proof be necessary) that the slope is from the site towards the area of EXTREME VULNERABILITY.

Finally, this site at Carranstown is a most UNSUITABLE site, and as admitted by one of the Indaver Witnesses at the Oral Hearing, was chosen with the aid of a COMPUTER PROGRAMME FOR VEHICLE JOURNEYS which of course took no cognisance of the extreme vulnerability of the surrounding area.

It is amazing that the producers of Maps for the Indaver Company always managed to miss on their maps the "Mount Hanover National School" which has been shown on all Ordnance Maps since 1837. One would think that if they were really anxious to convey the proper information to the Authorities that they would have at least included that rather than the area to the North especially as they claim that their noxious effluents will not affect the Boyne river.

Yours faithfully,

Mary P. Burke

Mary P. Burke, B. Ed.

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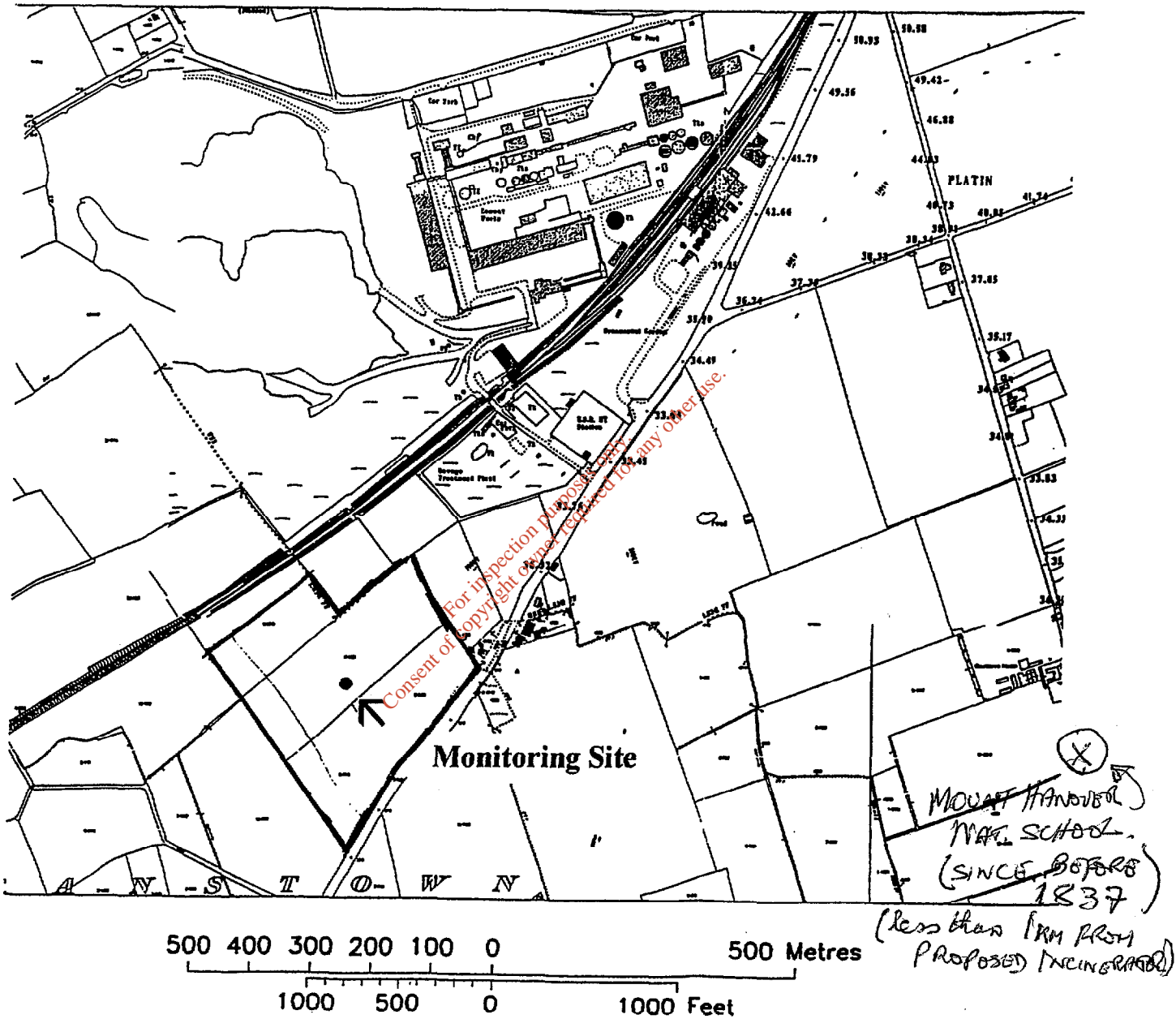


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This is a copy of the overlay map
of the area - slightly enlarged - from
the G.S.I at Beggars Bush. This map
clearly shows Mt Henover School.
Why didn't the E.I.S for Indaver
do likewise?

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Figure 1 Monitoring Site Location for Ambient Air Survey at Carranstown

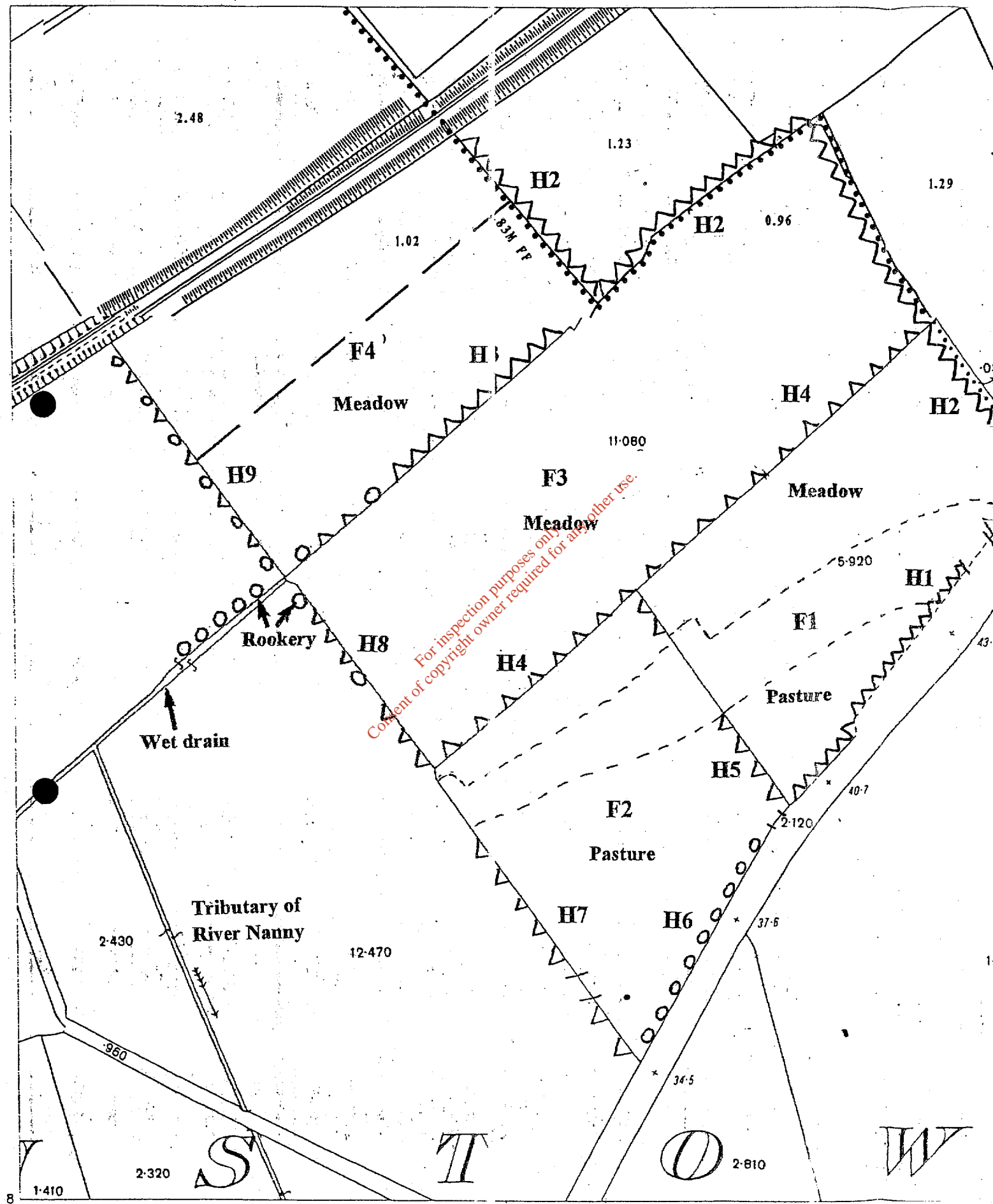


*Why is Mt. Hanover School
not clearly marked on
this map?*

Surveyed 1909 - 1993
 Revised 1974
 Levelled 1910 - 1991

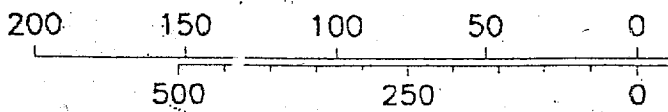
Rural PLACE Map

305982



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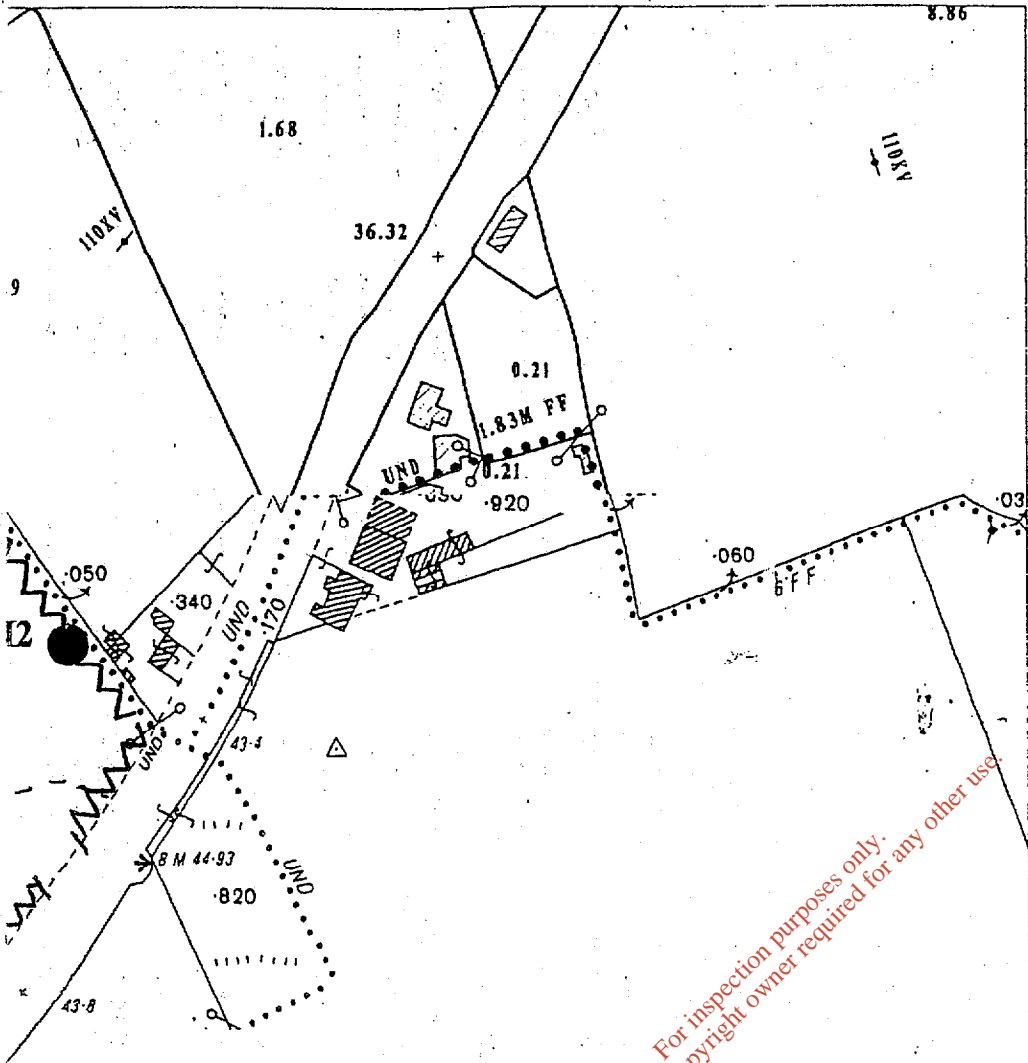
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306807

271158



DESCRIPTION



MAP SCALES

1:2500
 2381-D
 25inch
 MH027-02

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**Figure 1. Site at Carranstown, Co. Meath
 Habitat & Landuse Map**

Intact hedgerows
 Hedgerows with a gaps
 Trees

F1 to F4 are field numbers as mentioned in text.

H1 to H9 are hedgerows as mentioned in text.

Hatched line through fields 1 (F1) and 2 (F2) represents location (approx.) of wire fence.

Biosphere Environmental Services, June 2000



Suirbhéireacht Ordanáis Éireann, Páirc an hIonnuisce, Balle Átha Cliath a thiomnaigh a cháigh agus a d'fhóillsigh.

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Ní hionann bóthar, béalach nó cosán a bheith ar léarscáil seo agus fianaise ar chhead tll.

The representation on this map of a road, track or footpath is not evidence of the existence of a right of way.

Dianchosc ar mhacasamhl an t-omlán ná aon chu de gan chhead roimh ré ó Sdlúthóir Shuirbhéire. Ordanáis Éireann.

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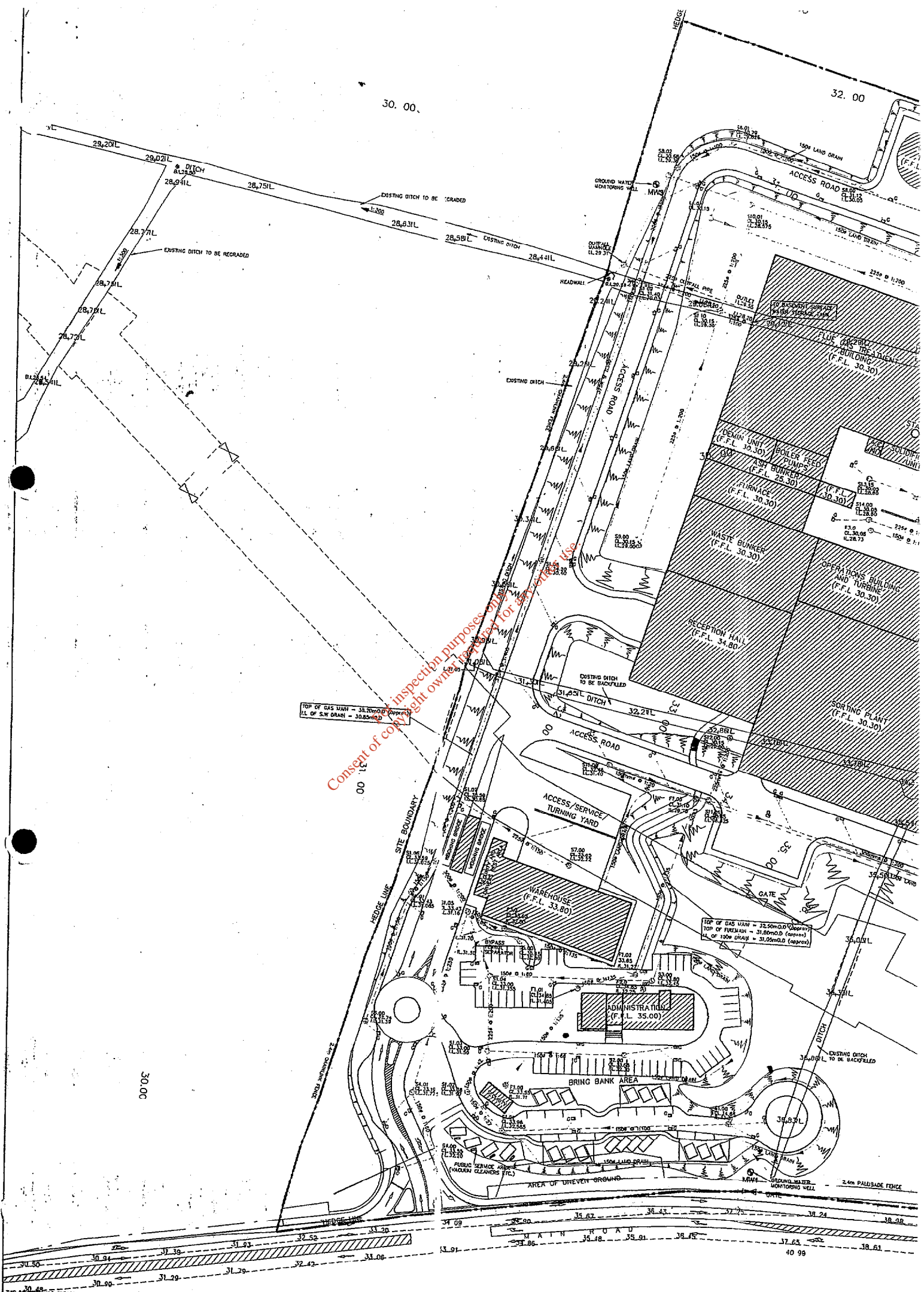
200 Metres

500 Feet

Plot Ref. No. 140562_1_1
 Plot Date 09-MAY-2000

270548

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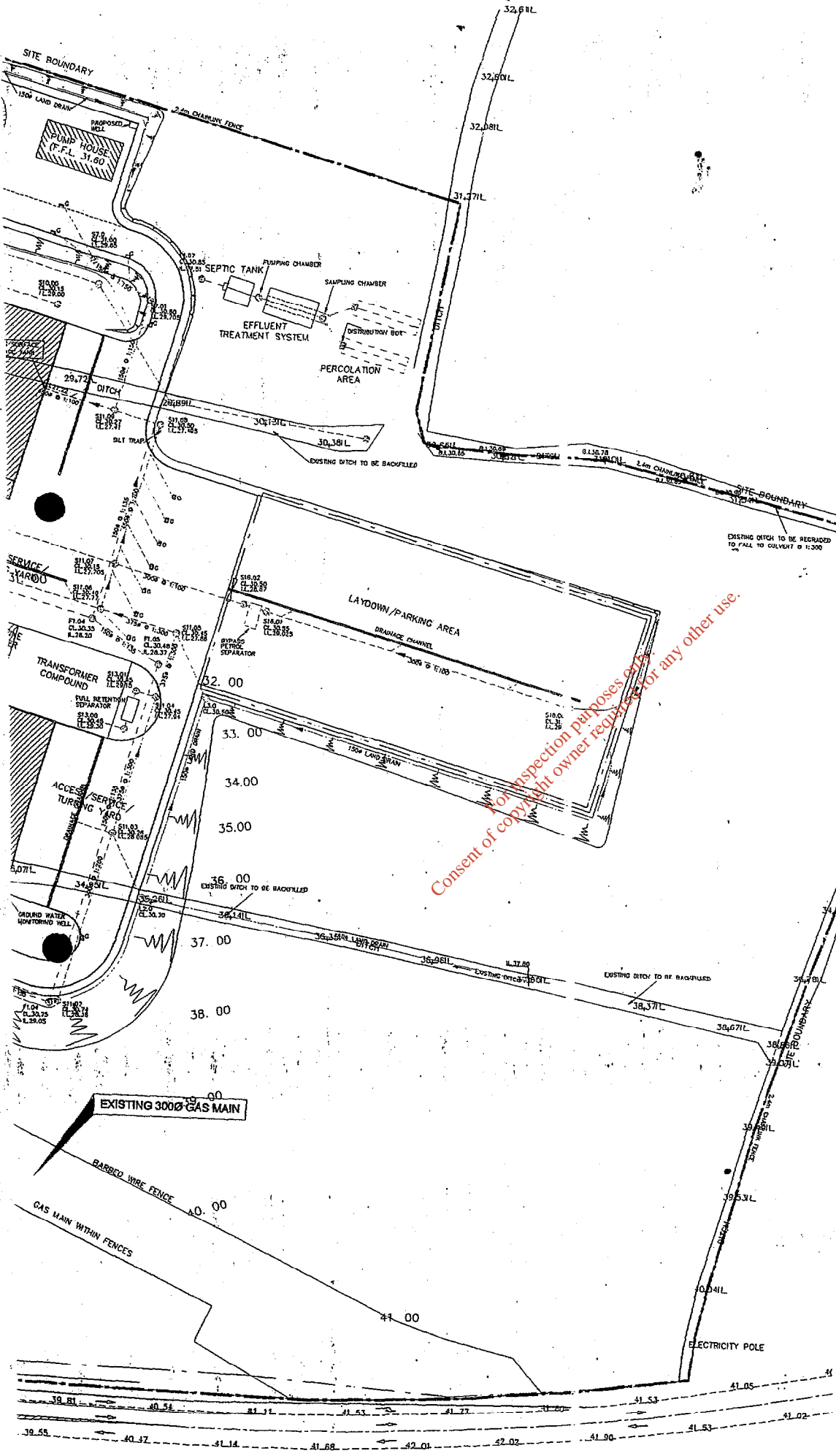
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TOP OF GAS MAIN = 30.80m O.D. (approx)
 I.L. OF S.W. DRAIN = 30.85m O.D.

TOP OF GAS MAIN = 32.50m O.D. (approx)
 TOP OF FIREMAN = 31.80m O.D. (approx)
 I.L. OF 150mm DRAIN = 31.05m O.D. (approx)

LEGEND

- - - S1.0 PROPOSED S WATER SEWER/MANHOLE
- - - F1.0 PROPOSED F SEWER/MANHOLE
- - - L1.0 PROPOSED LAND DRAIN/MANHOLE
- ⊙ MW PROPOSED GRD WATER MONITORING W



A	PRELIMINARY	ACLU	AP
ISSUE	DESCRIPTION	DRW	AUD
		INDAMER IRE 4 HADDINGTON DUN LAOGHAIRE CO. DUBLIN TEL: 01-453 1122 FAX: 01-453 1122	
		VALERO ASSOCIATES (REGISTERED)	
PROJECT	WASTE MGMT FACILITY - CARRANSTOWN		
TITLE	FIGURE 9.1 PROPOSED SITE DRAINAGE (PAGE 127 OF DOCUMENT 268-22-DR-001A)		
CLIENT REF.	PROJECT No.	CLIENT ORG No.	CONTR ORG No.
	2688		2688-49-DR-005
AO	SCALE	1:500	



4.2.2 Possible damage to hedgerows by construction works

During the construction phase, there is a possibility that damage could be caused to some of the hedgerows outside the main development area by construction traffic, machinery, storage of bulk materials etc. Any damage to the hedgerow (H2) along the townland boundary would be of some local significance as this is one of the better formed hedgerows in the area and is considered as of some ecological value. Damage to this hedgerow can be avoided with proper care (see recommendations section).

4.2.3 Potential for water pollution

As already noted, the possibility exists for contaminated water to enter the drainage ditch immediately west of the site and which leads to a tributary of the River Nanny. Potentially polluting substances could include suspended solids, wash down cement products, fuels, lubricants etc. If such substances were to enter the watercourses in significant amounts they could cause serious damage to the aquatic flora and fauna.

4.2.4 Impacts on rookery

The rookery which exists in the ash tree in hedgerow no. 8 may be directly affected if this tree is removed. The significance of this could only be considered as low as the rook is a very common bird species. Nevertheless, efforts should be made to retain this tree.

5. Mitigation measures and recommendations

The following measures relate to retention and protection of the hedgerows and to the possibility of enhancing those which will remain in situ. Also, there is an opportunity for the planting of new hedgerows. Suitable landscaping proposals for the development site could enhance the area for wildlife. Recommendations are also made relating to prevention of possible water pollution and to retention of the rookery.

5.1 Retention, protection and enhancement of hedgerows

Efforts should be taken to reduce the loss of hedgerows to a minimum. In particular the sections of hedgerow containing tall ash trees (H9) should be retained as far as is possible, along with the two single ash trees in hedgerow no. 8.

As discussed above, the loss of the hedgerow (H6) will be of minor significance in a local context. This will be mitigated by the extensive landscaping proposals, involving the planting of native species of trees along the boundary and on site.

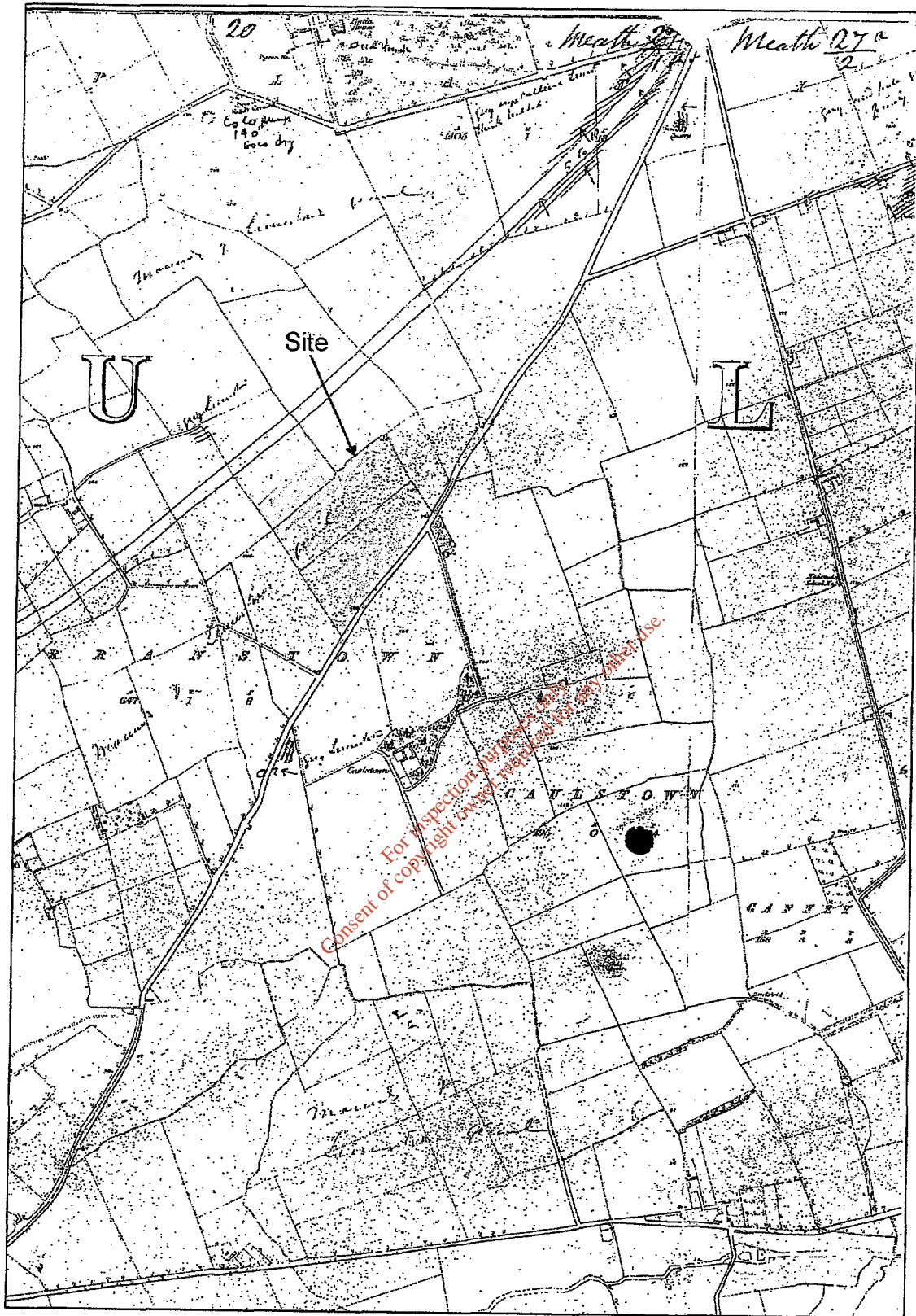
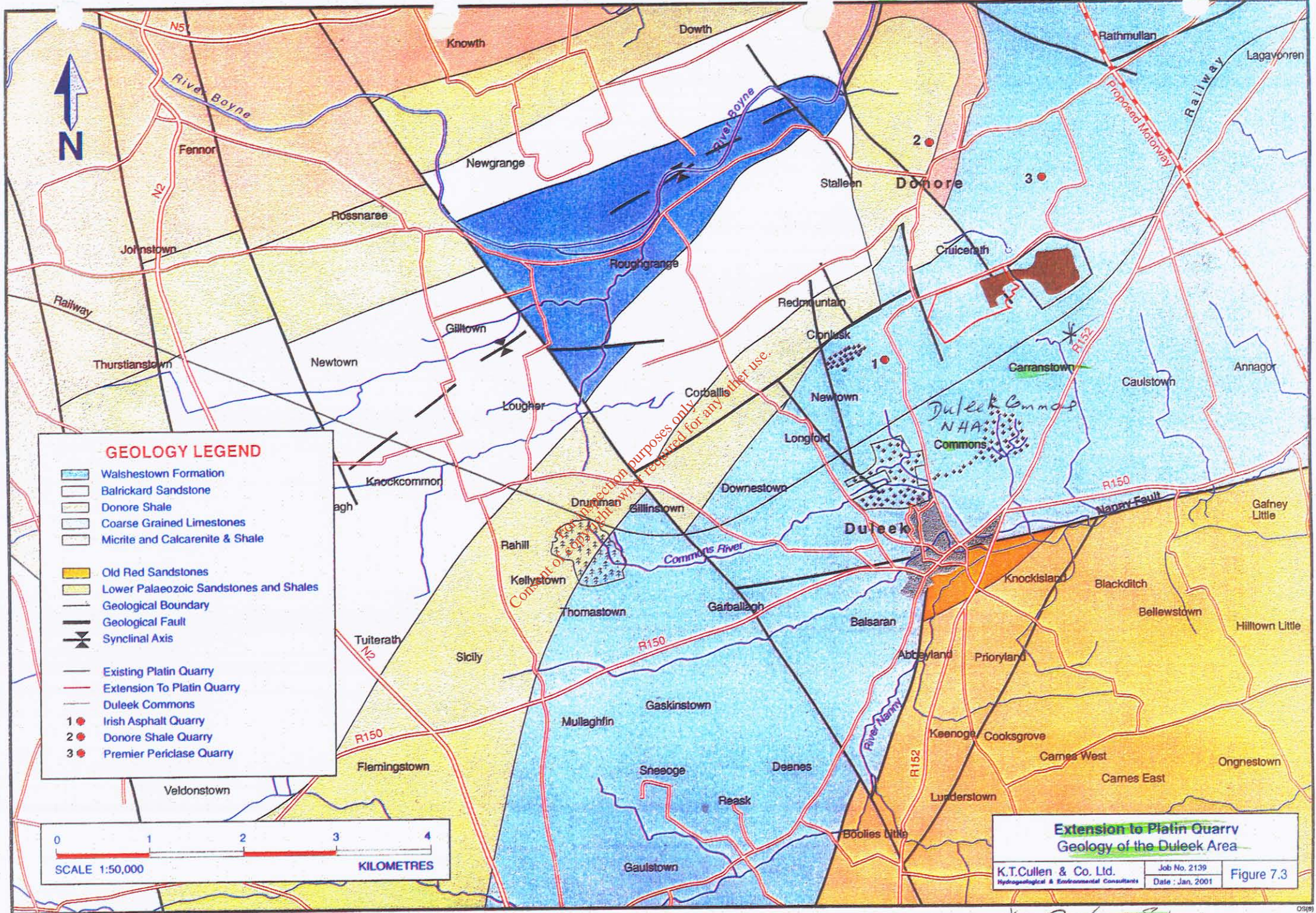


Fig. 3 First edition Ordnance Survey map, Co.Meath, sheet 27a/1 & 12.
 Surveyed 1837 Scale 1:10,560

*Mt Hanover National School
 is marked on this 1837 map*

swallow hole at Cruicera



GEOLOGY LEGEND

- Walshestown Formation
- Balrickard Sandstone
- Donore Shale
- Coarse Grained Limestones
- Micrite and Calcarenite & Shale

- Old Red Sandstones
- Lower Palaeozoic Sandstones and Shales
- Geological Boundary
- Geological Fault
- Synclinal Axis

- Existing Platin Quarry
- Extension To Platin Quarry
- Duleek Commons
- 1 ● Irish Asphalt Quarry
- 2 ● Donore Shale Quarry
- 3 ● Premier Periclase Quarry



Extension to Platin Quarry
Geology of the Duleek Area

K.T.Cullen & Co. Ltd. Hydrogeological & Environmental Consultants	Job No. 2139 Date : Jan, 2001	Figure 7.3
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** Andrew Sills*

