



Crossabeg / Killurin Community Action Group
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The transport of solid and semi solid material should also be transported to the site in a sealed container.

Much as is the current precedent for waste transfer stations, we would consider it to be very appropriate that the preliminary transfer of waste material, from the transportation containment to the initial receiving tank, that such a risky activity should be conducted within a designated reception building, and not exposed to atmospheric influences. In addition this building should also be supplied with an odour control unit.

We were very surprised to note in the inspectors report an assertion that the odour contribution from the activity would be reduced by 80%, considering that the most significant sources of odour likely to be generated on the site will be from activities prior to any of the proposed treatment processes.

In this regard the conveyance of material at the front end of the process will be no different from an odour generation prospective than any other coarse slurry handling systems.

Objection #4 Conflicting Limits on Pig Slurry to Supplementary Feedstock Ratio

The applicant had originally proposed that *'pig slurry will be mixed with the supplementary feedstock to achieve pig slurry to imported waste ratio of 9:1'*. The total slurry production was estimated at 33,350m³ yet the Agency has specified a limit to imported supplementary feedstock of 6,000 m³. To maintain the ratio of 9:1 the supplementary feedstock limit has to be capped at 3,706 m³.

Objection #5 Groundwater Monitoring Wells

It is contended that the reserve and main supply groundwater wells are inappropriate to utilize for groundwater monitoring vis a vis environmental protection. These wells are likely to be deep bore wells to ensure consistency of supply and as such they would be ineffective in assessing contamination in the immediate subsurface. This is considered to be particularly appropriate due to the proximity of the River Slaney an SAC and the likely proximal links with shallow groundwater at the locality of the applicants proposed development.

Objection #6 Noise Limits

The noise limits specified in Section B.4 at night are 45 dB(A) L_{Aeq} (30 minutes). It is strongly argued that a more appropriate night time noise limit in this rural location would be 35 dB (A) L_{Aeq} (15 minutes) with no tonal or impulsive component.

Objection #7 Environmental Liabilities

It is strongly contended that the requirement in Condition 12.2 to demonstrate the financial provisions in place in relation to the underwriting or costs for remedial action is wholly inadequate. Anything less than a fully independent and insured bond is in unacceptable risk.

Objection #8 Fit and Proper Person Assessment

In the EPA's website it is specified that a 'fit and proper person' is;

"...any person employed by the applicant to direct or control the activity has the requisite knowledge and qualifications to carry on the activity in accordance with the conditions of the licence".

In the Inspector's report it states that *"It is proposed that the suppliers of the biogas plant equipment will provide full training to staff...."* It is argued that the operator and staff should be in a position to demonstrate to the EPA through certification or otherwise that they have the capabilities and knowledge to operate the plant safely both from an environmental and health & safety point of view. In the case of the recent licences granted to Indaver for the operation of the waste facilities in Duleek



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and Ringaskiddy, the licence requires that the manager of the installation have at least 10 years experience of operating such a facility.

Objection #9 Fish Waste Digestate

The Inspector's report acknowledges that there is little or no precedent for the spreading of digestate containing fish wastes; hence the possible risks are unknown. To this extent the conditions as set out in the proposed determination cannot provide assurances that the proposed development will not pollute the environment.

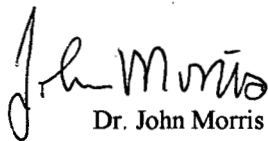
We would strongly recommend that clarification is obtained from the Dept. of Agriculture regarding the compatibility of the proposed process with their animal by-products processing guidelines Ref. version 2-30/08/2005

Specifically concerns over the following;

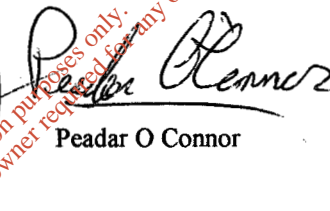
- Operating temperature of the digester process
- The land spreading of the digestate.
- Hygiene requirements.

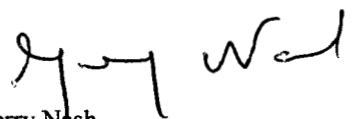
We request that the Agency acknowledge the receipt of this objection as soon as possible and for the protection of the local environment and local residents' health and safety address our objections comprehensively when considering the proposed determination.

Sincerely,


Dr. John Morris


Michael O Leary


Peadar O Connor


Gerry Nash

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