Rossport
Ballina
Co. Mayo
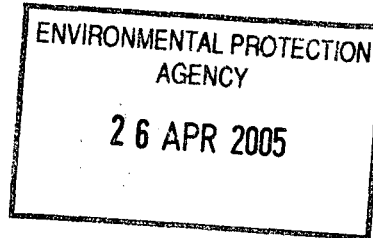
22/4/2005

EPA Headquarters
PO Box 3000
Johnstown Castle Estate
Co. Wexford

● **Objection submission to IPPC licence for proposed gas refinery at Bellanaboy Bridge, County Mayo.**

Dear Sir

I am one of the residents living along the route of the proposed Corrib gas upstream pipeline which runs parallel to the shore of Sruthfadaconn Bay.

● The Bellanaboy Bridge terminal being proposed by Shell E&P Ireland is situated 2km from the inner shores of Sruthfadaconn Bay.

As the site is an exposed location it can be accepted that it will be subject to elemental erosion. Rainwater erosion may result in large amounts of silt entering the proposed drainage and silt settlement pond systems. Wind erosion may result in peat and mineral particles entering watercourses outside the proposed development. This will obviously increase the risk of siltation and pollution.

There are 4 areas of importance namely Glenamoy bog complex, Sruthfadaconn Bay, Carrowmore Lake and Broadhaven Bay which are all located within a very short distance of the main site.

The excavation of 450,000 cubic metres of peat from the site is going to accelerate the movement of run-off pollutants into the streams that run into Carrowmore Lake.

Site investigations have been carried out by Shell E&P over the last number of years. This has involved drilling into the aquifer which leads to Carrowmore Lake. The result of this drilling is that the water quality of the lake has severly deteriorated, as confirmed by a study recently published by Mayo County Council.

The waste discharge pipe that is proposed to run from the terminal to Broadhaven Bay is a source of great concern to me.

The fact is that a mixture of chemicals such as methanol, benzene and mercury will be released into a pristine fishing ground, one of the best in Europe which is also home to the Risso's dolphin, bottlenose dolphin, common dolphin, harbour porpoise, white beaked dolphin, atlantic whitesided dolphin and Minke whale.

Due to the nature of the currents in the bay any pollutants being released through this discharge pipe will not disperse to the open waters, but instead will flow back into Sruthfadaconn through tidal action. This will lead to a concentration of these pollutants in the bay.

In its' application documentation to the EPA Shell repeatedly referred to emissions to air, to ground, to sea, and to watercourses as being within **AQS**, and **EQS** and **TA** and **LUFT** guidelines as though these are acceptable norms in all situations. What we have at Bellanaboy is not a normal situation. It is a gas refinery sited within a cluster of seven designated areas of conservation.

These areas would not have qualified as **SAC's**, **SPA's** and **NHA's** if such industrial levels of pollution were present in the area in the first instance.

Furthermore, Shell has not carried out the baseline studies which would prove the pristine quality of our environment as Posford Haskoning make very clear in their report as consultants to the Marine Licence Vetting Committee. The NWRFB submission to the EPA also makes this point forcefully.

Based on the information that Shell has published regarding the terminal there will be pure gas releases to the atmosphere through 'cold venting'. There will also be massive amounts of carbon monoxide being released on a constant basis, methane releases, fugitive emissions from 'predicted leaks'. This combination leads to the very real possibility of a vapour cloud explosion occuring.

The possibility of there being leaks along a high pressure pipeline carrying raw gas, methanol, and assorted impurities along the 9 km stretch of Sruthfadaconn Bay leads to a danger of leaching of these lands and with this eventually ending up in the bay.

In conclusion the pristine environment that is the entire Erris region will be devestated. Its great potential for eco-tourism and all its heritage will be lost for the next generation.

Yours Sincerely

Brendan Philbin

Brendan Philbin.