Trim Road,
Kinnegad, Co. Westmeath

Environmental Protection Agency

IPC Licensing

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Initials

Environmental Protection Agency, P.O. Box 3000, Johnstown Castle Estate, County Wexford.

Proposal by Lagan Cement to burn Meath and Bone Meal at their Plant at Killeskillen, Kinnegad, Co. Meath
Planning Reference TA 50545

Dear Sirs,

I wish to object to the proposal to the proposed planning regarding Meath and Bone Meal Incineration at Lagan Cement, Killeskillen, Kinnegad Co Meath for the following reasons:

- Kinnegad is one of the fastest growing areas in the country and it would seriously undermine its future sustainable development if a local concern was to be the source of an inordinate amount of pollution. As secretary of Kinnegad Community Council I am aware that there are 7 serious threats within 5 miles of Kinnegad at present including 4 dumps, a composting plant and two applications to burn meat and bone meal. This represents one of the greatest of these as it only a mile and half from the town and the risk form dioxins, prions and general emissions is something that I did not feel my young family would have to endure when we moved to this area;
- There are no comprehensive studies on the risks of meat and bone meal incineration on public health and specifically on children with breathing difficulties, elderly residents, unborn children, livestock, the food chain, etc.
- The amount of dust created in the lifetime of the plant would not inspire confidence in the local area if there were any concerns around the nature of the material. Dioxins in any incineration process have long given cause for concern. Considering your organisation relies on Lagan itself for information regarding emissions and accidents does not inspire any confidence. The company promised in its initial application to only burn coal and oil and possibly gas.
- The area is a pristine environment on a tributary to the Boyne in an agricultural area. Furthermore many of the rivers adjoining this development have long salmonoid histories and provide sources of water to the area. This development could emit so much potentially dangerous material into the local atmosphere and soil that it could seriously undermine our area and its future potential for the thousands of families who have chosen to make it their home. Inevitably the new emissions and all the extra traffic consequent to extra amount of material will devalue property in this area.

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- The proposal is to use 30,000 tons of Meat and Bone Meal per annum alongside 50,000 of coal and it states that in time these figures could be reversed, yet it also states that this would be a maximum of 45%. 45% is very high and if the figures were indeed reversed this would be substantially higher. The history of Lagan Cement to date has been 6 planning permissions in 6 years to increase capacity; Why should we believe it will stop here? Further expansion could result in over half of Irelands meat and bone meal being incinerated at this plant.
- Incineration of any form is one of the least preferred options in regional waste plans, in the County Development Plan and the EU; Basically it is a Stone Age solution to a 21st Century problem. Further to this there are many other ways to dispose of meat and bone meal like alkaline hydrolysis and Fermilan, which do not put communities at risk. When one considers all the hidden risks like groundwater, air quality, and long term exposure to high levels of dioxins this is a risk we should not be forced to take.
- I-would have serous concerns about the untold and yet to be acknowledged health risks these sleeping giants impose on a community

In this area we have serious concerns around the long term monitoring of this facility, as neither Meath County Council nor the EPA can sit outside the gate policing this development in the years to come. These kinds of developments can then lead to pressure on the local community to accept other forms of waste be burned in the factory. Once there is a commitment to meat and bone meal that level of alternative fuel needs to be supplied. The experience of the international community is that incinerators need to be constantly fed and rather that cutting down on waste actually contribute to its expansion. This is not in line with Irelands commitments to the EU, nor with the waste plans for Meath or indeed the Midlands Waste Management Plan (in bordering counties Westmeath and Offaly).

In all I have serious concerns in relation to:

• The Impact on future Local Planning, the effects on farming, the effects on health, Impact on Children, Flora and Fauna, Noise Pollution, local Bogs, Air Pollution, Local Amenities, Ground Water Pollution, Landscape (Visual Impact), Geology, Impact on local dwellings, Archaeology, Local History and Heritage, Smells, Traffic, and the Impact on Tourism.

I can elaborate on any of these on request.

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As there are too many concerns about incineration internationally at present as well as a serious lack of real scientifically verifiable assessment of the chemicals meat and bone meal incineration would produce, I ask you to refuse a license or permission in any form to burn meat and bone meal at Lagan Cement.

Sincerely,

Denis Leonard