

**Environmental
Protection Agency**

30 JUN 2005

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Colehill,
Kinnegad co Meath

Office of Licensing and Conditions
EPA Headquarters
PO Box 3000
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To Whom it may concern,

We wish to object to the application by Lagan Cement (ref No 752) to burn Meat and Bone Meal as a fuel source at the Killaskillen Cement Plant. When the license for the cement factory was initially given it was a stipulation that no waste fuels would be used at this plant. This was one of the reassurances given to the local community after objections to the first application to construct a cement kiln.

We wish to object to this proposal on the following grounds:

The potential health risks to residents, livestock, pregnant women and the unborn child. This is due to the exposure to Dioxins that may be released through the burning of MBM. It is our belief that insufficient research has been carried out to suggest that this is not a potential risk to the peoples and livestock of this district.

We are also very concerned about:

- Potential risk to groundwater quality (which since operations began at the Lagan site, many adjoining neighbours have seen a decrease in their ground water quality).
- Potential risk to air quality.
- Potential of dioxins entering the food chains through the crops and livestock of our district.
- The inevitable de-valuation of property both residential and farming as a result of the burning of MBM at this plant. (In recent times many persons looking to purchase in the district have been disinclined due to the proximity of the Lagan enterprise.)
- The potential of our minor roads once again becoming used by heavy vehicles enroute to Lagan in a dangerous circumstances. (In the past there have been many near misses due to heavy traffic en route to Lagan)
- The potential loss of farming livelihood due to the dioxins, pollutants of groundwater, air quality etc..

EPA

MAIN FILE ☒
PUBLIC FILE ☒ ☒
EVALUATION FILE PB
DATE 20/7/05 gg

Despite assurances in promotional material from Lagan that 1400 degrees centigrade will kill all BSE prions. It is my understanding that the greatest threat to the formation of dioxins during unforeseen cooling when the plant shuts down unexpectedly, according to the EPA enforcement files the Electrostatic Precipitator trips out on average six times a month and in August of 2003 tripped out on thirty six occasions at the Lagan plant.

This same promotional material which has been distributed to all residents in the vicinity of the plant, Meath County Council officials and media. I believe uses the EPA logo in unauthorized manner on a number of occasions. To suggest that the EPA endorse this application prior to the decision process.

Plants for burning of MBM in Germany are designed specifically for the purpose and follow stricter guidelines and controls than Lagan will have to adhere to. The record to date at the Lagan plant of human error and lack of training style incidents (reasons given in enforcement reports as to why the surrounding community has been covered with dust and grit on a number of occasions) is very poor. Countries such as New Zealand have resisted the incineration of MBM and explored the Alkaline Hydrolysis and Anaerobic Digestion process to deal with agricultural waste products in order to maintain a green image of their agricultural industry.

The Lagan corporation have pulled the wool over this communities and the EPA's eyes through a campaign of planning by stealth of some 10 changes to the initial planning application, to incorporate higher production, a second kiln, an asphalt plant, storage facilities (which will now be used for MBM) etc. All these changes in a period of just four years. Because of this we have very grave concerns that the initial burning of MBM fuels will eventually result in the incineration of many more forms of waste material at this site in the future. This is not acceptable to a rural community trying to live in a clean, healthy environmental area.

The communities past dealings with Lagan leaves us with very little confidence in the ownership and management of this operation towards the welfare of it's community neighbours. In the past there have been many breaches of operation in regards to dust created from the site, noise, blasting at unspecified times etc.. The fact that the plant is self monitoring throws some doubt as to adherence to EPA guidelines. We feel further concessions to the applicant will result in further breaches of environmental policy to the detriment of our community.

Yours sincerely,
