

**Environmental
Protection Agency**

08 SEP 2006

Ms. Noeleen Roche,
c/o The Environmental Protection Agency Licensing Section,
P.O. Box 3000,
Johnstown Castle Estate,
County Wexford.

Gortacragher,
Rossport,
Ballina,
County Mayo

06th September 2006

Registered Number: 738

Re: Application for an Integrated Pollution Prevention and Control (IPPC) licence which included an accompanying EIS received from Shell E & P Ireland Limited in respect of a gas, condensate, and miscellaneous hydrocarbons refinery/terminal facility proposed to be located at Bellanaboy Bridge, Bellagelly South, Ballina, County Mayo.

Dear Madam,

I refer to the above application for a licence which is at present before the Environmental Protection Agency. I wish to make a submission on the above IPPC licence application and would request that its content be fully considered by the agency.

I wish to object to the granting of the licence to the applicant on a number of grounds. It is my understanding that the Agency in their assessment of the application for a licence are to consider all of the environmental aspects of the on-shore facility including the chemical effluent proposed for discharge into Sruth Mhada Conn estuary which is surrounded by a cluster of Special Areas of Conservation. I have always outlined in my correspondence to the various agencies that the fundamental overall Corrib Gas project (and the use of its infrastructure for further expansion with respect to the hydrocarbon industry) including the inland refinery which is unprecedented in nature need to be subjected to a thorough review re. health and safety aspects and also with respect to the devastating consequences which the chemical emissions from the purification process at the proposed refinery will incur to the pristine air, sea and land environments. The best option in my opinion to resolve this issue is to process the hydrocarbons offshore in a steel water jacket platform, or by utilising "Twister" technology at source. The resources offshore have increased exponentially in financial terms and thus the cost issue with respect to the development proposal should not arise i.e. the resources should be processed in accordance with best available practice. A report based on data in the E.I.S. conducted by a gas refinery engineer, Peter Rossington, stated that this proposal *"incorporates some of the worst gas terminal design, that actually maximises emissions and minimises energy efficiency"*. This concept is riddled with environmental vandalism and thus I would request that the agency uphold the statutory standards in order to insure that the public welfare and our pristine environment is upheld.

I refer to a letter requesting further information from the applicant sent to Mr. Mark Carrigy, Operations Manager for the proposed terminal and dated the 11th August 2006 and posted on the main file on the 15th August 2006 by the agency. The letter refers to the following paragraph:

"I refer to the Environmental Impact Statement submitted as part of your application for an Integrated Pollution Prevention and Control (IPPC) licence, which was received on 08/12/2004.

I am to advise in accordance with Article 14(2)(b) of the Environmental Protection Agency (Licensing) Regulations 1994 to 2004 that the EIS does not comply with sub Article 14(1) in so far as the risk of environmental pollution from the activity is concerned.

In the circumstances you should make immediate arrangements to have the following information submitted to the Agency within one month of the date of this notice:-

- > Update the EIS so as it reflects the current IPPC licence application where appropriate.*
- > Provide a scaled layout plan of the refinery, identifying all principal components and emission points.*
- > Quantify the fuel and water required during operational phase and hydrocarbon condensate production....*

... It should be noted that the eight-week period within which the Agency is to decide the proposed determination cannot commence until this notice has been complied with".

I wish to draw your attention to the "cold venting" of the gas issue. The Health & Safety Authority confirmed that it was an issue in a letter dated the 12th August 2005. This reality means that by association the applicant must apply to Mayo County Council for approval as it is a planning matter. The H.S.A. in the regulatory fashion can then assess the risks associated with same. It is my considered opinion that it is not acceptable therefore that the applicant should be allowed to submit further information at this stage instead of being requested to submit a new and complete E.I.S. as the original one on which submissions from the public and other statutory agencies were based was incomplete. The applicant must submit a new E.I.S. which takes into account this information re venting arrangements of which the applicant had been aware of from inception. As the site and its surrounds which include the upstream pipeline and the effluent discharge pipeline are under the "Seveso II Directive" as an establishment and as this is new information which the H.S.A. did not have access to (even though the applicant did), or the public consequently the full "domino effects" with respect to risk, and chemical explosions and chemical by-products which can form carcinogens have not been properly assessed. It is the remit of the agency to assess environmental aspects thus it must work in tandem with the other relevant agencies to form an overall appreciation of the true extent of the potential environmental consequences. I also refer to the incineration of condensate on site which will lead to elevated environmental emissions as opposed to the burning of natural gas. The blatant lack of the use of best available technology is again self evident and I trust that you will take these considerations into account in your deliberations.

Yours faithfully,

Brid Mc Garry.
Brid Mc Garry.