

Dear Sir,

Re: Shell v De Facto

Sub No 24

In his letter to Mayo News (14<sup>th</sup> Sept.) Mr. Mark Carrigy of Shell says "Contrary to Mr. McNally's arguments, the Health & Safety Authority is a prescribed body and has already made a submission to the EPA in relation to Shell's IPPC licence application". Perhaps Mr. Carrigy should read what Mr. McNally actually wrote. Mr. McNally made no reference to the prescribed status of the H.S.A. and, secondly, the one-page letter from the H.S.A. to the EPA on 24<sup>th</sup> Dec. 2004 hardly amounts to a submission, especially as it ignored key contents of the IPPC licence application.

Despite what Mr. Carrigy says, 'cold-venting' of gas is a health and safety issue, as confirmed by the H.S.A. in a letter dated 12<sup>th</sup> August, 2005. This in turn means that it is primarily a planning matter for which Shell must initially apply to Mayo CC for planning permission. Only then, when requested to do so by the planning authority, can the Health & Safety Authority carry out the very necessary 'risk assessment' report.

As a 'Seveso' site, Shell should have included the 'cold-venting' information in the Environmental Impact Statement in the first place, in order to have the issue addressed as per 'Seveso II Directive'. Since it was not in the EIS, the H.S.A. did not assess the toxic effects of gas in their 'risk assessment' (H.S.A. Report p.21). Consequently, Shell acted improperly in applying to the EPA for permission to 'cold-vent' under IPPC licence having by-passed the essential planning permission necessary for doing so. This pattern of evasion is typical of the 'project-splitting' strategy adopted by Shell throughout this project.

Releasing 160,000 kg. per year of natural gas onto an unsuspecting public through 'cold-venting', with another 119,000 kg per year from equipment leaks is not "*a very small amount of gas*", - neither is the 6,700 kg. released once a month. Yet these are only the normal instances - the thin end of the wedge. The greater dangers arise when abnormal or emergency situations occur - these are, by definition, the ultimate purpose of flaring/ 'cold-venting' and may be quite frequent.

With all such releases, the oxygenation of methane gas in a cocktail of 500 million cu. ft. of daily emissions originating at 500°C+ can produce formaldehyde and formalin, and these are both carcinogen. Yet 'cold-venting' of gas is only one highly questionable practice in a long list at this proposed refinery. These include:-

- Incinerating 3,600 tonnes annually of condensate, supposedly for heating purposes, when there is an abundant supply of 'free' natural gas already on site;
- Storing up to 4,000 tonnes of fatally toxic Methanol (blindness is caused with even light contact) on site, when the alternative glycol is much safer - but more expensive;
- Pumping out 500 million cu. ft. *per day* of chemical cocktail emissions at an average temperature of 500 degrees Celsius into an environment known to experience atmospheric 'inversion', as local fog patterns regularly highlight.
- Mixing in 36,000 tons of dry cement with peat to 'stabilise' roadways on-site with consequent carcinogenic runoff implications for the regional water supply, Carrowmore Lake, SAC, which is also an important fishery.

A report by gas terminal engineer, Peter Rossington, states that the proposed refinery "incorporates some of the worst gas terminal design, that actually maximises emissions, minimises energy efficiency". This project is not 'state-of-the-art', as claimed by Shell, but a 'yellow-pack' project aimed at maximising profits to add to the already obscene profits of this rapacious multinational. Its website would lead one to believe that it is among the more enlightened of multinationals but Nigeria, Sakalin, etc. and our own experiences show otherwise.

It remains to be seen therefore whether the EPA will succumb to the extraordinary pressures exerted on the other agencies responsible for protecting the public's welfare or whether it will uphold statutory standards.

Yours faithfully,  
Ed & Imelda Moran, Chapel Street, Belmullet.  
097 81225

**EPA**

MAIN FILE ✓  
PUBLIC FILE ✓x2  
EVALUATION FILE ✓AMD  
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