Castlebar friends of 'Shell to sea'.

ENVIRONMENTAL PROTECTION AGENCY
2 0 FEB 2007

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15th of February 2007

Environmental Protection Agency Headquarters

PO Box 3000, Johnstown Castle Estate, County Wexford. Christine (McDonnell) Halligan 15 Rossmore,

Pontoon Road, Castlebar,

Co. Mayo.

RE: Objection to the Proposed Determination of the EPA to issue IPPC Licence to Shell E & P Ireland Limited for the proposed Gas Refinery at Ballinaboy, Co. Mayo. 'Reference: P0738-01'.

Taking into consideration Council Directive 97/11/EC & Council Directive 96/61/EC, Epa's Regulations & Acts, we the undersigned object for the following reasons...

Dear Sir/Madam,

On behalf of the Castlebar friends of 'Shell to sea' I wish to submit this objection against the Proposed Determination by the EPA to issue an IPPC Licence to Shell E & P Ireland Limited for the proposed Gas Refinery at Ballinaboy, Co. Mayo - 'your reference: P0738-01'. We wish to raise the following Environmental concerns:

1. The large inventory of dangerous chemicals e.g. 4,000 tonnes of methanol, condensate, diesel, etc, which make the proposed gas refinery a SEVESO site constitutes a significant danger to the Erris peninsula.

The lack of any emergency services in close proximity to the site is a cause of great concern. Any accident will cause an unacceptable health and safety risk to the people of Mayo and further a field, through air pollution, due to prevailing westerly winds. The prevailing winds will bring emissions overland, where the high rainfall will bring pollutants onto land and into the groundwater.

- 2. Cold Venting the release of gas that hasn't been burned, into the atmosphere will cause air pollution. Standard pipeline gas is usually over 80% methane. The methane is lighter than air and thus floats up into the atmosphere. However the problem arises when heavier than air compounds and chemicals are dispersed into the air along with methane. The fact that these toxic heavier than air compounds and chemicals come to ground within the proximity of the site, poses an unacceptable health and safety risk to the local community and to residents in Castlebar, through air pollution, due to the prevailing westerly winds. Shell E & P Ireland Limited got planning permission with an incomplete Environmental Impact Statement. Shell only revealed their decision to cold vent gas when they applied to the EPA for an IPPC license.
- 3. The following lists of compounds and chemicals can be emitted during gas flaring, venting and during the gas treatment process:
- Benzene
- Toluene

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- Ethyl benzene and Xylene
- · Carbon monoxide
- Nitrogen oxide
- Sulphur Dioxide

We object to Shell's intentions to pump c. 50,000 tonnes of these environmentally damaging gases and chemicals into the skies over Mayo, as it will have serious implications for the health of all.

- 4. Annual usage of methanol was put at 1,825 tonnes (IPPC license application, p.239) this turns out to be untrue as further information shows that annual usage is 3,100 tonnes. Shell claims methanol is recycled and re-injected implying none is lost. We are concerned as to the environmental damage that will be caused should the unaccounted 3,100 tonnes of methanol be lost to the environment annually, as it is a fatal poison.
- 5. 'Broadhaven Bay is a protected EU site.....there is no planning permission for the outfall pipe bringing contaminants from the proposed refinery into this protected bay' (letter to the Western People, 24/01/2007). Shell must obtain planning permission from Mayo County Council and this has not yet been done. It is unprecedented to authorise the proposed outfall pipeline, until a grant of planning permission is received from Mayo County Council or An Bord Pleanala.

Furthermore, we wish to raise the following Planning issues:

- 6. The Upstream high pressured volatile gas pipeline was omitted from the planning process, with Shell remaining to find an agreed route for this contentious pipeline. An Bord Pleanala senior planning inspector Mr. Kevin Moore stated that: "from a strategic planning perspective this is the wrong site; from the perspective of government policy which seeks to foster regional development, this is the wrong site; from the perspective of minimising environmental impact, this is the wrong site; and from the perspective of sustainable development, this is the wrong site." (FIOSRU report, November 2005, page 35).
- 7. The process of 'Cold Venting' was entirely omitted from the Environmental Impact Statement as submitted with the planning application to Mayo County Council and An Bord Pleanala a breach of EIA directive. Therefore the Health and Safety Authority could not assess the toxic effects of gas in their report to the planning authority. As this is a SEVESO site the HSA is responsible for the public. Shell only revealed their intention to 'Cold Vent' gas when applying to the EPA for an IPPC license, long after getting planning permission. Since an application is assessed on the information received by the EPA, which was at variance with that is the EIS; this violates Section 14 of the EPA regulations requiring the EPA to request Shell to 'amend' their EIS.
- 8. No Serious analysis of the potential toxic consequence of such excavation (i.e. the removal & relocation of such mass amounts of bog) has been done.

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- 9. No one knows the untold cultural damage being done by excavators to our priceless heritage artefacts buried in the blanket bog. Such artefacts must be preserved. The EPA must protest at the absence of a designated archaeological expert on the site to monitor such excavations.
- 10. Why is it so easy for Shell to build new roads through this area, when for ordinary people it would not be possible?

In conclusion although Ireland has ratified the Koyoto Protocol and is aiming to meet its target commitments there is renewed international concern regarding global warming evidenced in the newly published UN Intergovernmental panel on climate change 02/02/2007. Urgent action is needed in relation to greenhouse gases omissions (Reference The Irish Times, 03/02/2007).

We are concerned about this proposed gas refinery being licensed by the EPA at this particular time and still so many long term environmental questions and concerns pending. We urge the EPA to take full cognisance of these serious environmental issues in considering this submission. Please find attached €127.00 submission fee.

Yours respectively, the undersigned.

P.S. (Another issue of public concern is the fact that public opinion in An Nuacht RTE/TNS mrbi poll in September 2006 shows that 61% of respondents were in favour of the proposed gas refinery being constructed offshore. 4% believed the gas refinery should not go ahead at all giving 65% in total against the proposed refinery. Also 66% of respondents were against the proposed high pressured gas pipeline being constructed through the farmer's lands in Rossport.)

Petition

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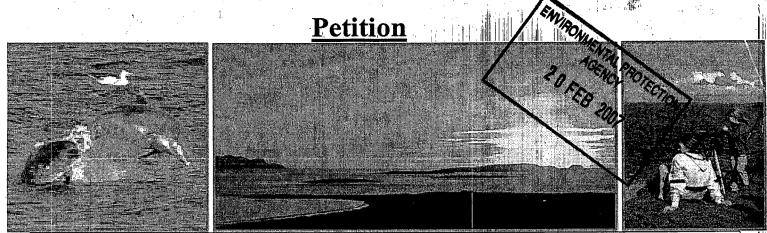
The EPA (Environmental Protection Agency) has recently proposed to issue an IPPC licence for a gas refinery in Ballinaboy, North Mayo. This licence will allow Shell to pump hundreds of millions of cubic feet of environmentally damaging gases per day into the air over the west of Ireland. This will reduce the quality of the air we breathe and worsen Ireland's already abysmal record for greenhouse gas emissions. This licence will also give Shell permission to discharge dangerous chemicals and heavy metals into Broadhaven Bay. This bay is a marine SAC (Special Area of Conservation); it is unique in that it supports over 8 species of whale and dolphin and an abundance of other marine life. Carrowmore Lake, water supply for the entire region is at very serious risk of pollution. The issuing of this licence does not seek to protect the Irish environment.

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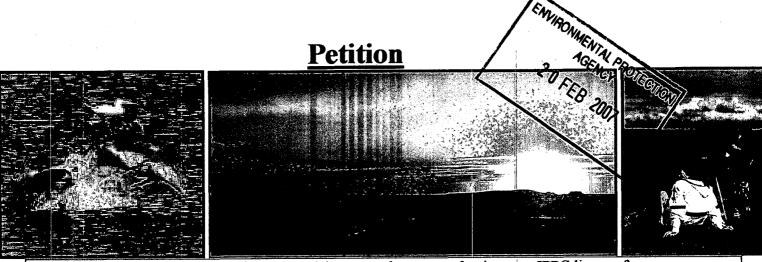
Objection dated 15/02/2007 by Christine Halligan to the Proposed Determination by the EPA to issue an IPPC Licence to Shell E & P Ireland Limited for the proposed Gas Refinery at Ballinaboy, Co. Mayo. 'Reference: P0738-01'. Submission by Castlebar, 'Shell to sea' support group as undersigned:

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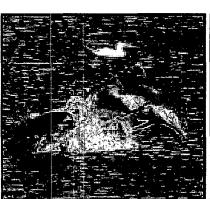


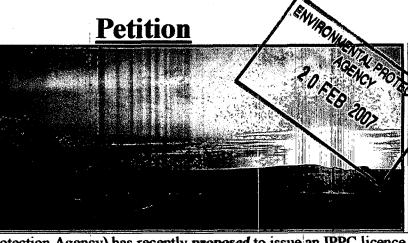
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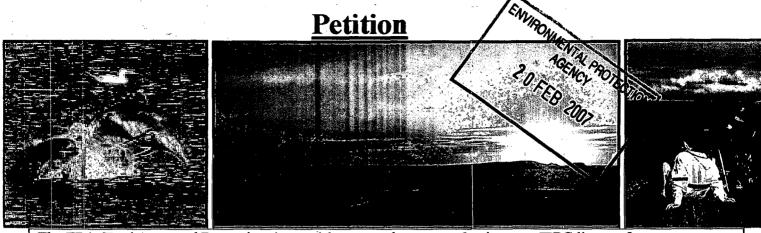
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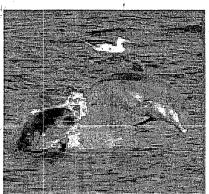
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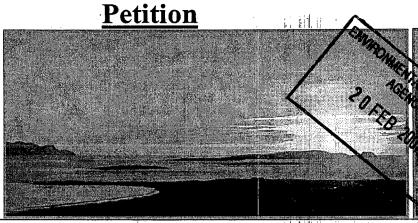
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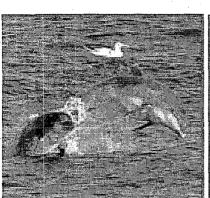
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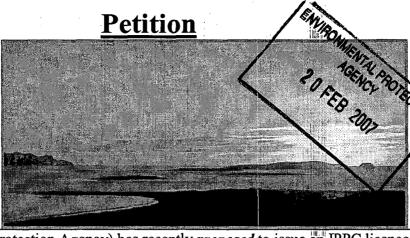


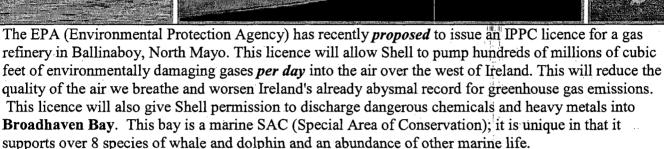


Carrowmore Lake, water supply for the entire region is at very serious risk of pollution. The issuing of this licence does not seek to protect the Irish environment but seeks to protect multi national oil companies at the expense of the pristine Irish environment.

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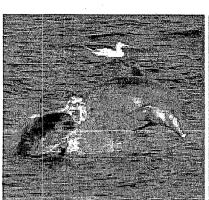


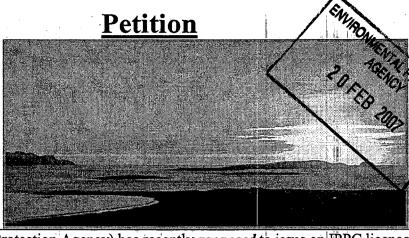




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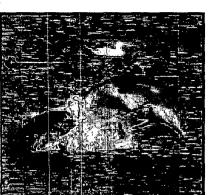






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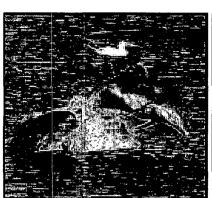


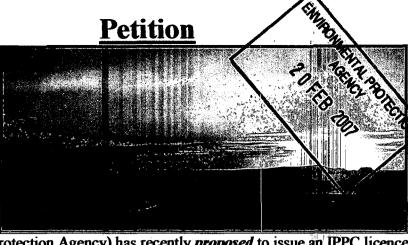


The EPA (Environmental Protection Agency) has recently proposed to issue an IPPC licence for a gas refinery in Ballinaboy, North Mayo. This licence will allow Shell to pump hundreds of millions of cubic feet of environmentally damaging gases per day into the air over the west of Ireland. This will reduce the quality of the air we breathe and worsen Ireland's already abysmal record for greenhouse gas emissions. This licence will also give Shell permission to discharge dangerous chemicals and heavy metals into Broadhaven Bay. This bay is a marine SAC (Special Area of Conservation); it is unique in that it supports over 8 species of whale and dolphin and an abundance of other marine life. Carrowmore Lake, water supply for the entire region is at very serious risk of pollution. The issuing of this licence does not seek to protect the Irish environment but seeks to protect multi national oil companies

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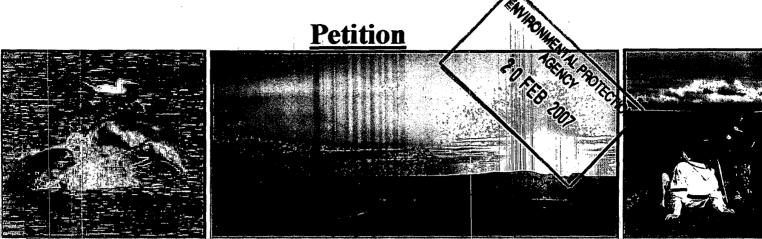






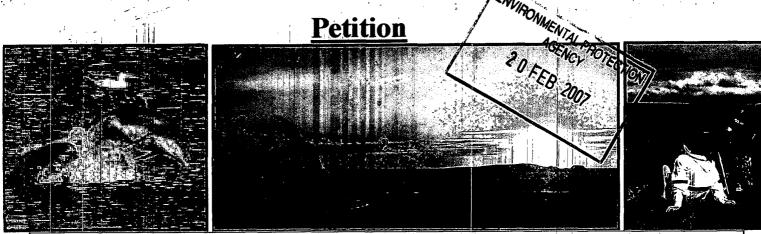
this licence does not seek to protect the Irish environment but seeks to protect multi national oil companies at the expense of the pristine Irish environment.

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