

**GLENISLAND COMMUNITY COUNCIL
GLENISLAND DEVELOPMENT COMPANY LTD.
GLENISLAND, CASTLEBAR, CO.MAYO**

EPA
Attention of: Noeline Roche
PO Box 3000
Johnstown Castle Estate
Wexford
Co.Wexford

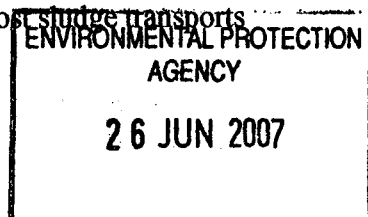
June 25th 2007

Re: Submission of observations
Waste license review application (No.W0021-01)

Dear Madam,

We, Glenisland Community Council and Glenisland Development Company Ltd. would like to submit the following observations:

1. The village of Glenisland is the closest settlement to Derrinumera landfill site with its church 4 km and its National School only 3.5 km to the east of the landfill flare. The nearest resident is – counter to what is stated numerous times in the EIS – only 0.9 km away (as the crow flies). Despite the fact that southwesterly and northwesterly winds prevail, the inhabitants of Glenisland were not identified as "sensitive receptors" of noise, dust and odour emissions. The samples selected for noise and dust monitoring do not include any location at the eastern boundary of the site (Figure 4.2.3, Volume II, Main Text). As the proposed developments would operate 24/7 the impact on our community could be considerable, especially as the residents of the Glenisland area are already regularly exposed to landfill odours as described on page 110, Volume II of the EIS. The odour assessment is incomplete as there is no scenario corresponding to existing landfill operations plus all proposed developments comprising a sludge drying plant (interim or other), a leachate treatment plant and tunnel composting.
2. The sludge drying facility is proposed to receive sludge from WTPs and WWTps of the whole county. If this should prove not to be economically viable for the tender sludge of industrial and agricultural origin as well as sludge from other counties might have to be imported leaving Derrinumera in a geographically most unfavourable location close to the west coast.
3. The main access road to Derrinumera is the R311 and most sludge transports will have to travel via Castlebar.



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According to the draft 06/07 Castlebar and Environs Development Plan 2008 – 2014 Castlebar's "approaches will continue to suffer from heavy traffic congestion relating to the key through routes such as the N5, N60 and N84", it continues "major investment in roads infrastructure will be needed to avoid traffic congestion in the future." People living in the area know that the capacity of the road network is inadequate and not coping with the present traffic load, let alone sludge transportation related traffic which will be transferred from other parts of the county and concentrated in the Castlebar area.

4. Transport of sludges over considerable distances throughout the county conflicts with the proximity principle of the Connaught Waste Management Plan and has a negative impact on the environment.
5. There is no alternative given should there be no tender. In that case, the interim solution could go on indefinitely.
6. Exact details of the proposed development are not known as they will be established under DBO contract. Consequently, the environmental impact cannot be fully assessed at this stage.
7. If there was an interim plant to be operated, it should fully comply with all the existing rules and regulations and no latitude should be allowed.
8. Obviously, large amounts of fuel (Diesel, gas) would have to be stored on site. Considering that sludge drying is prone to dust explosions and self-ignition this appears to be a dangerous prospect.

Stephen Allen
Chairman
Glenisland Community Council



Enc.: pages 6, 97 and 117 of EIS

Martin Joyce
Chairman
Glenisland Development Company Ltd.

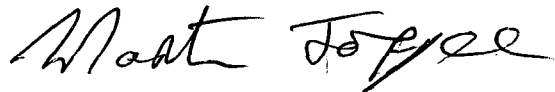


Table 4.1.3 Number of Participants for Castlebar International Four Day Walks, 1999 to 2005

Year	No. of Participants
1999	1,371
2000	1,223
2001	-
2002	924
2003	702
2004	804
2005	806

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 Glennisland
 area
 approx.

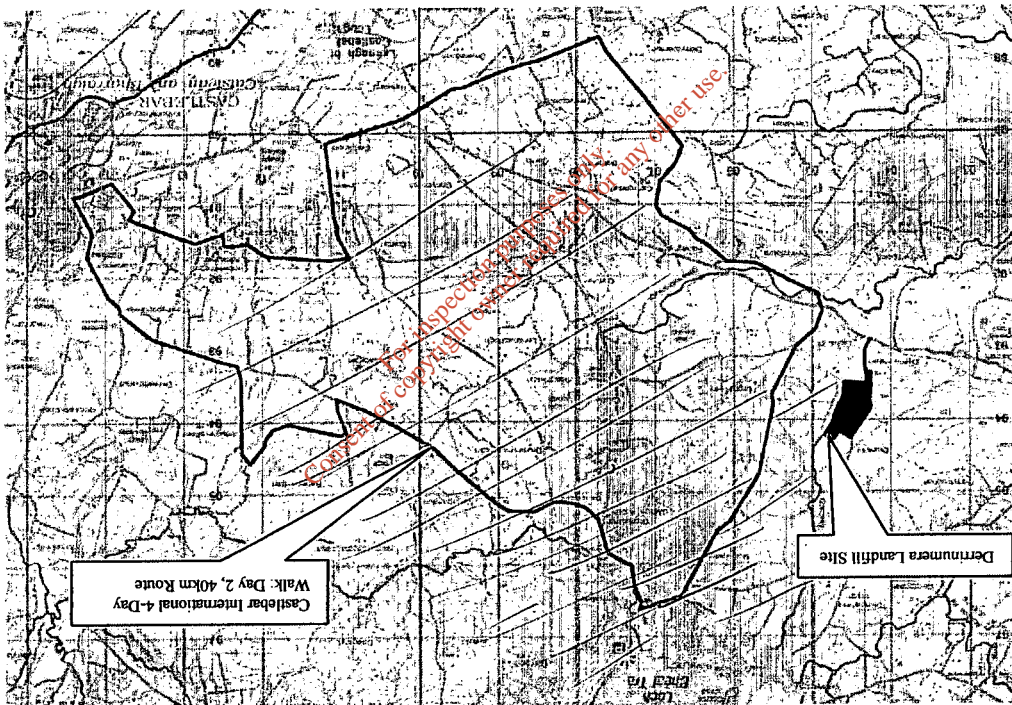


Figure 4.1.1 Castlebar International Four-Day Walking Tour – Day 2, 40km Route
 Source map: OS Discovery Series Map 31

Betra Lough is located 3.5 km to the North of the site and is an important lake for angling. The lake is 3.8 km wide and provides fishing for spring salmon and Grise from June and Sea trout from July. Angling is permitted at this Lough however it is no longer permitted to catch and kill trout here.

The Newport River flows into Clew Bay and Lough Betra is its source. The rights to fish here are owned in their entirety by Newport House, which also owns the fishing rights to West Lough Betra. The Newport River is noted for its salmon and sea trout fishing. This river is located north of the proposed development. The Newport River