

CD Placeholder

This page denotes that two CD's entitled "Beauty and the Beasts" were submitted as part of this licence application.

The contents of the above two CD's are not available on the Agency's website however, the original CD can be viewed by request at:-

Licensing Unit,
Office of Licencing & Guidance,
EPA,
P.O. Box 3000
Johnstown Castle Estate,
Wexford.
Tel: 053 9160600

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OH Doc No. 4 A

Recd From:

Mrs. Teresa McGarry

Date Recd:

16/04/07

Gortacragher,
Rossport,
Ballina,
Co. Mayo

The Licensing Unit,
Office of Licensing & Guidance,
Johnstown Castle Estate,
Co. Wexford

16th April 2007

Re: Application for IPPC Licence – Register No. P0738-01. (Submission to oral hearing to commence on the 16th April 2007 in the Broadhaven Hotel, Belmullet, County Mayo).

Dear Sir/Madam,

I refer to the above application for an IPPC licence to the developer Shell E&P Ireland Limited to operate a proposed gas refinery at Ballinaboy, Bellagelly South, County Mayo. I wish to make the following submission, and would request that its content would be fully taken into account by the agency. I wish to object to the granting of the licence to the applicant on a number of grounds as set out below which in my view demonstrates that the applicant is "**not a fit and proper person/company**" with respect to the protection of our health, safety and pristine environment.

Grounds for objection:

1) The proposed location for the inland unprecedented raw gas processing refinery (and other hydrocarbons in future years due to expansion plans) does not comply with international codes of practice because it is located 9km inland, and thus necessitates the need for a highly pressurised pipeline complex to traverse through our property (present proposal). This refinery complex is to be sited within the catchment area of Carrowmore lake as it is to be located on a flood plain, and also drains into Sruth Mhada Conn estuary via the local river tributaries. We also have a private well which could effectively be contaminated by groundwater seepage. The Glenamoy and Muingnabo rivers are key salmonoid spawning grounds and both these rivers drain into the estuary. Sruth Mhada Conn estuary and Broadhaven Bay are protected EU sites. The applicant has not applied to Mayo County Council for planning permission with respect to the discharge pipe (ancillary to the refinery) which is proposed to dump heavy metals and process chemicals (unrecovered) into the bay. The bay due to its cyclic properties will not discharge this chemical mixture to sea, thus the estuary and bay will result in and become a contaminated sump. These waters are of a pristine quality at present. I object to the proposed preliminary determination by the EPA to issue an IPPC Licence to Shell E&P Ireland Ltd with respect to this discharge outfall pipe issue when planning permission has not been obtained from the relevant authorities per same. I also object in principle to this unprecedented development as it will have devastating consequences on our health, and the health of future generations. This reality is highly alarming and unjustified.

2) The proposed refinery at Ballinaboy does not comply with the use of Best

Available Technology (BAT). A report based on data in the EIS (incomplete at that time as "cold venting" was omitted, which is now banned in most countries) 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"**. Myself and my family are highly aware that this proposal will destroy our pristine air quality, clean waters and our environment. The aerial and water emissions will have devastating toxicological bioaccumulation consequences on our health and well-being. It will also result in toxic levels of chemical bioaccumulation in our animals on the farm and marine organisms, and ultimately will also result in a total devaluation of our private property holdings. There will also be elevated noise pollution from the various installations. This is unacceptable destruction to be applied to a pristine and highly scenic area when other safer development concepts are available such as offshore processing, shallow water processing and "Twister" technologies. We must reiterate that we are not against the processing of natural gas in theory but it is imperative that the best standards are applied, and this is not the case with respect to this application.

The EPA proposed preliminary determination to issue the IPPC licence to the applicant does not appear to have taken these other development concepts on board and I would ask that they do so in their deliberations so that the environmental integrity of our area is ensured. If the agency was set up by the State to protect the environment, which I presume is its remit, how can that function reconcile with the authorisation of this environmentally destructive and unacceptable development. We as a community who are being forced to live under the shadow of this refinery, deserve better standards. I refer in this regard to a DVD enclosed and entitled **"Beauty and the Beast"** which outlines the lives of a community devastated by a refinery in operation in Durban, South Africa and operated by SAPREF (Shell & BP).

This environmental destruction is totally reflective of the reality that the applicants only remit is to maximise profit at any cost, and thus it demonstrates that they are **"not a fit and proper person/company"** in insuring that the protection of our health, safety and pristine environment is maintained. It does not demonstrate "equality of arms" if we as an indigenous people are to be sacrificed in the pursuit of massive profits for Royal Dutch Shell, Statoil, and Marathon Oil, and their shareholders. They can well afford to utilise best available technology and still make enormous profits with ease as a result. It is the function of the State and by extension the State agencies such as the EPA however to ensure that this is achieved and complied with.

3) Our residence in the village of Gortacragher is located within 2km downwind from the proposed refinery. This was not mentioned in the EIS to my knowledge. In the Inspectors report Bangor was named as the closest village. This is not the case. Our village is proposed to be sandwiched between the refinery and the unprecedented pipeline complex which is to operate at exotic volatile pressures through reclaimed peatland. The applicant's intention is to store large quantities of extremely flammable and volatile chemicals on site making this a **"SEVESO II directive"** site. What is the

EPA's remit in the event of an explosion and the volatile release of poisonous chemicals, and newly formed ones such as formaldehyde which is carcinogenic onto the receiving environment and its inhabitants.... in other words ourselves. The annual usage of Methanol was underestimated by the developer, how much of this will be adequately recovered. The true figure was not included in the EIS thus demonstrating once again that the applicant is "*not a fit and proper person/company*" to place ones faith in.

4) Have the EPA taken into account the likelihood of future landslides occurring in an area which was recently devastated by landslides in the Glengad area on the 19th September 2003. An explosion on site could accelerate more earth slides as this area is of a very sensitive nature thus once again highlighting the inappropriateness of this development location. The landslides and associated debris displaced local waterways and flooded the Bellanaboy river adjoining the site resulting in a direct connection between the two areas.

5) We would be highly concerned about a terrorist attack on the proposed refinery and/or associated pipelines. When one observes the international global uncertainty this represents a very real concern.

6) The applicant intends to "flare" off gas at Bellanaboy. This will also occur in emergencies and during shut down operations at the plant for maintenance requirements. This toxic chemical mixture at high temperatures will also be released into the localised environment. Various chemical carcinogens will be formed as a result of chemical reactions. This is of immense concern with respect to our health. This practice is also banned in parts of the world. Shell's practice of "flaring" in Nigeria has contributed to the global warming effect and thus once again this practice is indicative that the applicant is "*not a fit and proper person/company*" to place ones faith in.

7) As we are all aware at this stage, the development of global warming configurations and resultant catastrophic disasters as a result of industrial activity has the potential to devastate our planet. We do not feel that it is justified to purchase carbon credits so that the applicant can use primitive technology at Ballinaboy as this development will contribute to the Greenhouse Gas effect.

In conclusion it is self apparent that the blatant use of the most primitive technology is very self evident with respect to this proposal. The applicant does not have community consent to proceed with this project which will maximise toxic emissions into the atmosphere, instead of reducing them as they intend to incorporate some of the worst available technology into the overall design. We trust that you will take these considerations into account in your deliberations with respect to this highly serious and detrimental matter.

Thanking you,

Teresa mc Garry

Mrs Teresa Mc Garry and family