

Boolaglass Askeaton Co.Limerick 19-11-2007

For the Attention Dorota Richards

Please find enclosed fax covering comments on objections by Aughinish Alumina Ltd and the HSE to P0035-04

These same comments have been sent by post to the EPA Friday the 16th November 2007

Yours Faithfully,

Pat Geoghegan

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Signature
Environmental Protection Agency, HQ.
P.O. Box 3000, Johnstown Castle Estate,
Co. Waxford.

Boolagiass Askeaton Co.Limerick 11-11-2007

Environmental Protection Agency Licensing Section Johnstown Castle, Johnstown Estate Co.Wexford

Dear Sir

We would like to make comments in relation to the objection by Aughinish Alumina Limited and the HSE to the License Register Number P0035-04.

We will first deal with the objection by Aughinish Alumina Limited. Item 1.4.2 phase 2 BRDA Construction Schedule

Aughinish comments here are of great concern but come as no surprise that Aughinish assumes that a final Reviewed license will be issued by the Agency by mid February 2008 and that the Agency has approved the Detailed Design of same before the construction commences.

Can we take it again that it's a done deal with Aughinish and their colleagues in the EPA and both have to be seen to go through the formalities and that all will be tied up by mid February and that Aughinish will not be held up any further than is necessary by their colleagues in the EPA? If this is the case will our money be refunded? which we could ill afford to give in the first place in lodging our genuine concerns to this review which will have devastation for our family and the other objectors that supported our objection.

We can also take it that the Aughinish deadline between the EPA and themselves of mid February means that no oral hearing is been granted, will that money be refunded also to us of 100 euros?

We also note from Aughinish comments that the Agency has approved the Detail Design of same before construction commence, again shows the demands and expectations that this industry has been used of since 1998 with the EPA and it makes a mockery of the IPPC licensing that such a company can command such authority even in such a serious situation as this given the overall size, compared to an individuals or a family like ours, who wants to protect their children from further devastation from this expansion. It would appear that we are not dealing in a level playing ground and our objection will be given little or no consideration.

It's also clear from Aughinish objection under 1.4.3 Predicted rate of filing and rise of the Phase 1 BRDA that they are using the old tactic that they will have to cease production in 2010 until the residue neutralization plant is operational in 2012.

Under 1.5 Conclusion-must not implement residue neutralization. It's quite clear from Aughinish conclusion that they only intend to implement what they intend to implement not what the EPA wants to implement. Again the old tactic that it will increase their operating costs relative to the rest of the Alumina Industry. The PD as written would force AAL to curtail or cease residue/ Alumina production, which would be disastrous commercially for the company and all its stakeholders and nothing what so ever about the damage it will have on the community and the people who live in it.

The same buzz words are been used by Aughinish to the EPA for this Government like

- 1- Hold up cost money to Aughinish to Investors to Shareholders
- 2- Stop production jobs at risk
- 3- Its our way or no way

Those three buzz words should be enough to see Aughinish through. We as a family don't have the luxury of such buzz words all we have our two Children- Cancer-Livelihoods

- 1 Children Amanda and Meghan no one cares about their health and what health problem they develop
- 2- Developing cancer and other illness in the area -no one cares
- 3- Destruction of people's livelihoods to facilitate this extension- no one cares
- 4- Protect the Environment

As you can see we just don't have the "Buzz words" to swing it for us like Aughinish has?

Comments on the HSE Objection

The objection by the HSE seems nothing more than a PR exercise in seen to be concerned about protecting health and on the other hand ensuring they play no part in it.

In relation to the HSE they have failed to take a hands on approach instead they are leaving this Industry carry out what ever independent monitoring they like once the HSE ensure they are not party to requesting all substances been emitted by air which can damage human health in the area. The HSE has seen EPA inspectors report showing how Aughinish carry out their monitoring even independent monitoring and its been questioned many times by the EPA inspectors.

It is now going on 10 years that the acting Director of Public Health Dr Tessa Greally has taken the same decision as her predecessor Dr Kevin Keller Director of Public Health, have done everything possible not to know what Aughinish Alumina emits from their plant that can be dangerous to human health in the area. Dr. Kelleher in 1997 raised the concerns of what the affects that double the WHO levels of SO2 would have on human health with the EPA but failed to question or take the appropriated action that would have been open to him as the then Director of Public Health on the same matter. Dr. Tessa Greally and the HSE seem intent on following the same line in relation to Aughinish Alumina, just slip in an objection but one which contains no factual work or objection.

Yours Faithfully,

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