

OH Sub No. 47

Environmental Protection Agency

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ORAL HEARING
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Recd From: Rory Hearne

Submission to EPA Oral Hearing from Rory Hearne, member of CRAI and the People Before Profit Alliance Dublin South East.
April 22nd 2008

From the outset, I have been involved in CRAI for a number of years and I live in the Dublin 8 area. The campaign has taken an important step in explaining that this is a Dublin incinerator not just a Poolbeg Incinerator. It will affect people across the city in terms of the dioxins released, the increased waste charges required to keep the private operators in profitability, and the increase in traffic.

The incinerator is going to be a PPP. Lessons have to be learned from the Ringsend sewage treatment plant PPP. There are considerable odour problems in the local area from the plant and it is said that it is running over capacity. There have been rows between the private operator and Dublin City Council (DCC) over who should pay to get the odour problem addressed. Both partners refused to take responsibility. The lesson to be learned is that at least with the sewage plant we know there are problems because you smell it. If similar problems emerged during the operation of the incinerator for example with the filters which are supposed to remove toxic material from the flue gas who will know about it? We won't be able to smell it. DCC will not want to pay for extra costs to get better filters or whatever and you can be sure the private operator certainly will not want to reduce their profits to pay for extra costs to protect people's health. The basic problem is from an environmental health perspective is that we cannot trust either DCC or the private partners to operate the incinerator to the guidelines that will guarantee the protection of the health of the citizens of Dublin.

The EPA should also investigate the record of the planned private operator Covanta Energy. Why was Covanta bankrupt in 2004? Why was it also removed as the contractor of Tampa Bay Water's troubled desalination plant? Why has Covanta been accused by environmentalists (in the New York Public Interest Research Group) in the US of leaking poisonous dioxins from its incinerators?

(see <http://www.nypirg.org/enviro/waste/incineration.html>).

It is disappointing that Minister for the Environment John Gormley has not expanded on his recent statements that incineration is no longer government policy and clearly defined what will replace incineration. Minister Gormley, stated in 2006 referring to Dick Roche's attendance at pro-incineration conference in Dublin: "The Minister's attendance is yet another demonstration of the enthusiasm with which this Government promotes incineration over more sustainable waste management solutions... This is a gathering of many of the key promoters of incineration in Ireland... The incineration sector know that they can rely on ever increasing volumes of waste for as long as this government is in power and refuses to seriously address waste prevention and minimization". So now is your chance Minister Gormley to make the necessary statements so that the EPA can rule in favour of recycling and waste reduction rather than the mass-burn incinerator as being proposed.

- TODAY'S STATEMENT BY MINISTER GORMLEY IS WELCOME
BUT MORE URGENT NEEDS TO BE DONE ON THESE
ALTERNATIVES TO INCINERATION

If this were made it would be a matter of considerable influence on the outcome of this oral hearing. Recently issued figures for predicted waste disposal in the Country appear to show that, if alternative modern technologies are adopted, the total available national supply of residual waste for incineration would be of the order of 627,000 tonnes. We are asking the Minister to confirm this figure and state what proposals are before him to introduce these technologies. Clearly if this figure is correct the required capacity of the proposed Dublin incinerator has been seriously overstated and, therefore, if the policy is implemented it would lead to the incinerator becoming redundant. The EPA must look into these figures.

In particular from a sustainability perspective it is very clear that if this incinerator goes ahead it will be a major set back for recycling and reduction waste strategies because all the waste coming from Dublin (and perhaps beyond) will have to be directed into the incinerator to facilitate the incinerator to run at full capacity to ensure the private operators gain their financial return.

The incinerator will have the requirement to burn 600,000 tonnes of waste or else the private operator will start looking for compensation from DCC. This, I have no doubt will mean that DCC's stated commitment to recycling and reducing waste will be compromised by their financial necessity to provide a waste stream to the private operator of the incinerator. This logic flies in the face of a genuinely sustainable waste management policy for Dublin City.

According to the U.S EPA, incineration of municipal solid waste & medical waste are major sources of dioxin. So-called "modern" incinerators in fact release significant amounts of acid gases, harmful volatile organic compounds, and toxic dust. The American Public Health Association has expressed serious concern over the health effects of incinerator emissions and has strongly recommended intensive recycling. Dr Anthony Staines has pointed out that has not been an adequate assessment of the potential health impact on the population of Dublin if any accident were to happen with the incinerator.

The transport and management of the highly toxic Fly Ash is reportedly outside the remit of the EPA in adjudicating over the granting of this license. I would appeal to the EPA to look at this issue in the interests of the health of the people of Dublin. If it is not included the EPA, Environmental Protection Agency must question its ability to safe guard the environment and health of the Irish people.

It should be noted that even if the licence is granted to Dublin City Council local and people from across Dublin will continue to oppose the incinerator.

CRAI submitted 3000 letters of objection to the An Bord Pleanala Hearing in October 2006 but despite this An Bord Pleanala granted planning permission to Dublin City Council (DCC) to build the incinerator. Now we have another oral hearing and I really hope the people are listened to this time.