

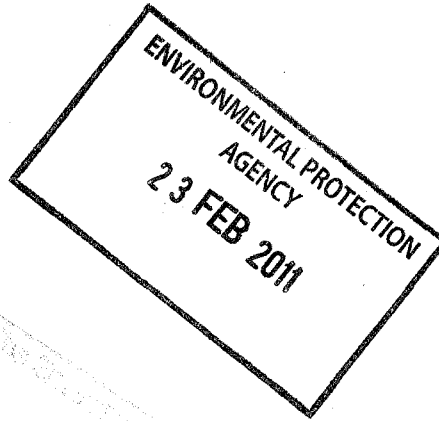


Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford

Environmental Health
Health Service Executive
Northern Area
First Floor
Unit 5, Block 4B
Blanchardstown Corporate Park
Dublin 15

Tel: (01) 809 8300
Fax: (01) 809 8350



Enquiries to: Noel Donnelly
Direct Line: 01-8098323
E-mail: noel.donnelly@hse.ie
Date: 21st February 2011

Re: Murphy Environmental Hollywood Ltd Integrated Waste Management Facility, Hollywood Great, Nag's Head, Naul, Co. Dublin: Waste Licence Application

Dear Sir/Madam,

The Environmental Health Service (EHS) has reviewed the Environmental Impact Statement (EIS) and relevant support material for the above. The EHS reviewed the EIS in detail under the following headings:

- Proposed site and project description
- Air Quality
- Noise and Vibration
- Soils, Geology and Hydrogeology

Other areas of the EIS were reviewed in less detail.

The EHS considers the EIS addresses all the above areas adequately and therefore have no comments to make.

The EIS documentation was also issued to the Emergency Planning and Public Health Departments within the Health Service Executive for consultation. Please find responses from both attached.

Yours sincerely,

Noel Donnelly
A/Principal Environmental Health Officer



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Emergency Management Office.
Phoenix Hall.
St Mary's Hospital Campus,
Phoenix Park.
Dublin 20.
Phone 00-353-1-6754100.
Fax 00-353-1-6754121.
emergency_planning@hse.ie

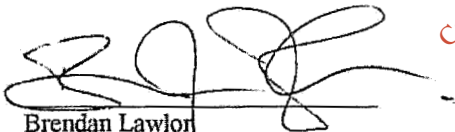
Noel Donnelly
A/principal Environmental Health Officer
Fingal Food Control
Unit 5, Block 4B.
Blanchardstown Corporate Park.
Dublin 15.

01/02/2011.

Proposed Waste Management Facility, Hollywood Great, Naul Co Dublin

Noel,

Thank you for the associated files in relation to the above site, having reviewed the non technical summary contained on the CD supplied, Our office can see no reason that would require our input, and are confident that the emergency plans of the HSE, in conjunction with the integrated response of the other Principal Response Agencies would be capable of managing an incident on this site.


Brendan Lawlor
Chief Emergency Management Officer.

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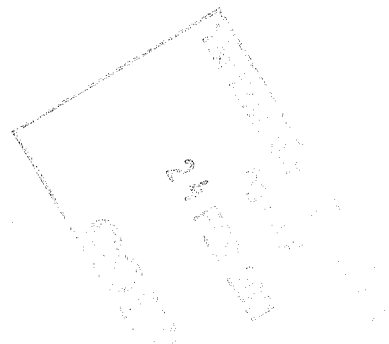


Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Department of Public Health
HSE
Dr. Steevens' Hospital
Dublin 8
Tel. 01 635 2000
Fax 01 635 2103

10th February 2011

Noel Donnelly
A/Principal Environmental Health Officer
Fingal Food Control
Unit 5, Block 4B
Blanchardstown Corporate Park
Dublin 15.



RE: Department of Public Health response on the EIS for the planning application and waste licence application for the proposed integrated waste management facility at Hollywood Great, Nag's Head, Naul, Co. Dublin

Dear Noel,

In relation to human health, the authors of the EIS have noted that the literature in relation to waste management and human health is inconclusive. The authors concluded that the facility does not pose any risk to human health.

This conclusion does not stand up in light of a number of points made by the authors themselves. In particular:

- The authors discussed the methodological difficulties with studies of landfill sites and health effects, in particular the lack of direct exposure measurement and identification of exposure pathways.
- The authors quoted the 2007 WHO:
“...Despite the methodological limitations, the scientific literature on the health effects of landfills provides some indication of the association between residing near a landfill site and adverse health effects....”
- The authors noted the absence of any literature specifically on the land filling of incinerator ash.

From the public health point of view, the conclusion from reading this EIS is not as the authors concluded above but rather that there is not enough evidence to say (conclusively) whether the proposed landfill facility *will or will not have an effect on human health*.

The recommendation is to adopt the precautionary principle. In order to protect against the unknown effect on human health, it is reasonable to expect that all precautions are put in place to minimize the potential impact on human health.

Procedures to ensure that the site is well managed and to protect the environment are under the remit of the EPA. Such procedures will go a long way to protecting human health. It is recommended that these procedures include an ongoing detailed log of all waste deposited at the site; with monitoring and audit controls of all procedures.

Application of the precautionary principle should include maintaining a low population in the vicinity of the site. The current low population density in the area was discussed in the EIS. The classification of the facility as a lower tier SEVESO site was mentioned as indicating that there would be no restrictions on planning permission in the area. However, the classification of the facility as a SEVESO site is under the Control of Major-accident Hazards Involving Dangerous Substances Directive. The health concerns (detailed in the EIS) around a landfill site such as this are not confined to a major accident.

From the start, it is recommended that procedures are in place to ensure that the site is managed appropriately after it ceases to accept waste. These should include the identification of responsibility and the necessary finance. It is recommended that a legal framework is put in place to ensure there are no loop holes that would allow those responsible not to fulfill their duty to protect human and environmental health.

Yours sincerely,

Dr. Patricia Mc Donald
Specialist in Public Health Medicine
Department of Public Health
MCRN 06526

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