

Joe Reilly

From: Licensing Staff
Sent: 08 August 2011 14:19
To: Joe Reilly; Noeleen Keavey
Subject: FW: New submission entered for Reg no: W0129-03. (Reference Number: W0129-03-110808012333)
Attachments: Submission.doc
Importance: High

From: Fiona Morrin [<mailto:fiona.morrin@gmail.com>]
Sent: 08 August 2011 13:24
To: Licensing Staff
Subject: New submission entered for Reg no: W0129-03. (Reference Number: W0129-03-110808012333)
Importance: High

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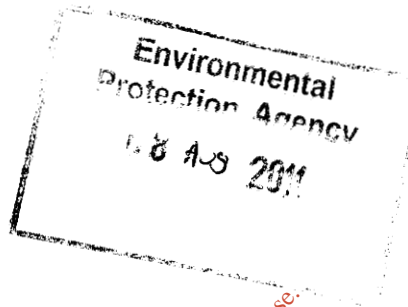
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Nevitt
Lusk
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7th August 2011

Environmental Protection Agency
Waste Licensing Department
PO Box 3000
Johnstown Castle Estate
Co. Wexford



Register Number: W0129-03

Applicant Name: Murphy Environmental Hollywood Ltd.

I wish to make a submission regarding above application for waste licence. I request that the licence is refused based on the following observations.

Traffic volume and unsuitable road infrastructure

The assessment given in the EIS that there will be no increase in traffic levels due to the proposed development is untrue. While the traffic volumes expected may not represent a change in the current waste license there will be a monumental increase in actual existing traffic volumes. The EIS non technical summary estimates that there will be 83 trucks loads per day at 300 days per year. This is a total of 49,800 truck movements per annum. The EIS non technical summary also states, "In 2007, the existing facility accepted approximately 23,000 loads of waste into the facility, but in 2009 approximately 2,200 loads were accepted." 83 trucks per day will be a huge increase in existing volume. The facility has been closed for some time now and fortunately due to the reduction of trucks on the road residents in the locality can finally use this route for walking and cycling. There are no footpaths or cycle paths

along this route so any increase in traffic will have a huge negative impact on residents in the locality as they will be unable to use the road.

As per the EIS the public road LP01080 will be used to access the site. This road is not suitable for the volumes of HGV traffic that this facility will bring. There are a number of sharp bends along this route at which collisions are common. The road is also extremely uneven and bumpy and has resulted in many trucks and tractors losing part of their load. My main concern is that there are no safeguards in place to mitigate the risk of a vehicle transporting incinerator ash shedding its load as a result of an accident or collision. The proposal has included measures to mitigate the risk of waste spillage at the facility during the transfer of incinerator ash from road tankers to storage silos, such as ensuring it takes place in a kerbed area in order to provide containment in the event of an accident. There is no way to contain a spillage should an accident occur along road LP01080. It is inevitable that an accident will occur given the large volumes of traffic expected on such an unsuitable road. I am also concerned about the lack of information given on the consequences of such a spillage occurring.

Insufficient investigation

The EIS includes a literature review of a small number of publications on the effects of landfill but states that *“unfortunately there does not appear to be any literature specifically on the landfilling of incinerator ash”*. The absence of studies is worrying in itself as it suggests that the effects of landfilling of incinerator ash are still unknown. At the very least the applicant should commission a study specifically on the environmental consequences of such a waste facility before proposing to situate one where the nearest residence is a mere 300 metres from the centre of the site. It is incomprehensible that the EIS can conclude that there will be no risk to human health when sufficient investigation has not been carried out.

Agriculture and food production

I am extremely concerned about the effect this facility will have on the livelihoods of the many food producers in this region. There is not enough emphasis given in the

applicant's documents to the fact that the predominant source of income of residents in this area is food production, whether it be from growing crops and vegetables, dairy farming, or beef and sheep farming. Most of this produce is sold to multinational supermarkets and dairies. Why would a company continue to purchase vegetables, meat or milk from a supplier in close proximity to a toxic waste facility when they can get the same product from a different supplier 50 miles away? A company's most valuable asset is its reputation. They will not continue to purchase food from this region for fear of damaging their reputation in the event of contamination occurring. There is an increasing emphasis by consumers to know where the food they purchase comes from. Any sensible consumer will avoid food that is produced close to toxic waste. Perception of its consumers is more important to a business than the environmental facts. It will be much simpler for a company to cease trading with suppliers in this area rather than suffer the fallout should it become known to consumers that they are selling food that is potentially dangerous.

Regardless of any safeguards put in place to ensure the safety of this facility the mere existence of it could be enough to destroy the livelihoods of all farmers in the region.

Air Quality

I am concerned about the impact the facility and its traffic will have on the air quality in the area. It is common sense that the dust and emissions created by the trucks alone, before even contemplating the incinerator ash, will reduce the air quality we have at present. The EIS non-technical summary states that "*according to the 2009 Annual Environmental Report for the existing facility, dust deposition monitoring results were significantly below the licence limit during both monitoring rounds*". As the EIS has reported that only 2,200 loads were accepted into the existing facility in 2009 the dust levels reported are irrelevant given the number of trucks expected with the new facility. It is unjust that residents should have to suffer such dust and potential elevated respiratory problems in their own back gardens.

I hope my points have illustrated how unsuitable this locality is for a waste facility of this nature. The risks that granting this license will create greatly outweigh any benefits of such a facility. The grave consequences that this facility will impose on

the environment and the locality are too serious to grant this license; the negative impact on the quality of life of all residents in the locality, the harmful impact on health, the potential contamination of food produce and the likely destruction of livelihoods of the many farmers in the region are all imminent should this license be granted.

With regards,

Fiona Morrin

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