P0738-03

Shell E&P Ireland Limited

Objection No 2 – Ms Betty Schult

Place Holder

Due to on-going technical difficulties in making the DVD files which accompanied this objection available on our website, we are unable to make these available at the moment. We will create links to the DVD files as soon as possible.

In the meantime, the DVDs are available for inspection, by appointment, at the Headquarters of the Environmental Protection Agency. Telephone 053 9160600 or email <u>licensing@epa.e</u> to make an appointment.

Objection No. 2

Submission of objection and request of an oral hearing to the EPA regarding Shell E& P Ireland's application for an IPPC licence for Bellanaboy Gas refinery - Ref P0738-03.

To:

Office of Climate, Licensing & Resource Use, EPAH etal PROTECTION

P.O.Box3000, Johnstown Castle Estate,

County Wexford

HEEMMIRGAINEENTAL PROTECTION AGENCY

0 8 MAY 2015

We, the undersigned are all residents of the immediate area affected by the proposed gas refinery in Ballinaboy.

We have at this stage experienced for more than 10 years how the planning and construction of this project impacted invasively and destructively on our environment in all imaginable ways.

We want to object strongly to your proposal to grant Shell E&P Ireland an IPPC licence for the following reasons:

On several occasions during the construction phase already, spills, sinkholes, light and noise pollution, changes to the land and the waters, breaches of regulations, even a large piece of pipeline floating in the protected waters of Broadhaven Bay have been noticed and reported by local residents, been denied or played down by the operators, covered up by MCC and ignored by the EPA both of whom are part of the Monitoring Committee for the project.

Our reports and observations have been blocked out consistently.

We have learned that there is no reliable system in place to react immediately and adequately when things go wrong, as they have done offten and will continue to do.

We find this dangerous and irresponsible.

In the end it is the local community who observe their environment on a daily basis and are the first to notice disruptions and alterations to it. How can we have any degree of confidence that what we observe and report will be followed up and investigated by this agency, the EPA?

The project is outdated in its design and technology, it has been changed and patched up over and over again.

Not one person was ever identifiable to us to have overall responsibility.

We have experienced that the operators of this project are naturally not interested in the safeguarding of the environment or the local people. We believe that the proposed project cannot be operated in a safe and environmentally appropriate manner and that the EPA is neither equipped nor willing to take on the responsibility for this time bomb which we are expected to live beside.

We are calling for an oral hearing into the EPA's proposal to grant an IPPC license to Shell E&P Ireland to allow us to explain and demonstrate in detail our concerns and our reasons for strongly objecting to this proposal

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Please find attached as part of out submission:

- 1) a list of incidents experienced and reported by us.
 - 2) DVDs containing footage of pollution
- DVD 1 Community Info, containing footage which shows Shell's contempt for conditions of planning
- DVD 2 Diesel Spill, Shell and Partners 2007
- CD-R 3 Broadhaven Bay, shell's dumping ground
- DVD 4 Sinkholes in Scruwaddacon Bay 2013
- **DVD 5 -**
- 3) a list of 64 signatures
- 4) a recently published map depicting light pollution in Ireland
- 5) a cheque over € 226,-, the fee for our objection and call for an oral hearing

From our point of view the track record of the EPA in monitoring the construction phase of the Corrib Project has been negligent at best. Rather than holding the developer to account and ensuring they operate within the law and in adherence to best environmental practice the agency has completely failed to fulfil its statutory role as environmental watchdog correctly and to the letter and the spirit of the law (EU directives on Habitat, Birds, Environment, etc.) and in its roles as a member of the Project Monitoring Committee (PMC) and the Environmental Monitoring Group (EMG).

Several incidents which occurred during the construction phase of the project illustrate this clearly. These include

- the issue of monitoring the aluminium levels in the drinking water from Carrawmore Lake (see attached DVD policing the pollution),
- The installation of an illegal septic tank beside Spawaddacon bay (cSAC) at the Shell compound in Rossport in 2005
- Illegal borehole drilling at Glengad beach, Broadhaven (Marine SAC) in 2008
- Illegal dumping of materials at Glengad
- Illegal road built without departmental approval at Glengad SAC and never investigated by the Department of the agency
- Testing of the Valve Station at Glengad which involved extremely high levels of whining noise over a bank holiday weekend in June 2011. The local community received no advance notice of the tests which made normal life impossible over the weekend for residents of Glengad village. During this time neither Mayo County Council, the Dept. of the Environment or the EPA were available to answer calls from a concerned public, nor did they conduct a satisfactory investigation afterwards.
- Test flaring at the refinery in December 2014 which was conducted when the project did not have a valid operating license.

This is not an exhaustive list.

Please confirm receipt of this submission to :

Betty Schult, Kilcommon Lodge, Pullathomas

Ballina

Co.Mayo

ENVIRONMENTAL PROTECTION AGENCY

0 8 MAY 2015

and/or to

Gerry Bourke

Aughoose

Ballina

Co Mayo

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ENVIRONMENTAL PROTECTION **AGENCY** 0.8 MAY 2015

A map showing light pollution in Ireland

. http://www.thejournal.ie/light-pollution-ireland-2038274-Apr2015/

Professor Brian Espey and his colleagues measured light falling on the ground at locations away from directly-illuminated areas (such as those with streetlights), and recorded the light scattered back onto the ground from the air.