



Submission NO.12

Mr James McCaffrey
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Environmental Protection Agency
Office of Climate, Licensing & Resource Use
PO Box 3000
Johnstown Castle Estate
County Wexford

25th February 2016

Re: **Objection to proposed amendments to Industrial Emission Licence P037803 – Quinn Cement Ltd**

To whom it may concern;

I wish to object in the strongest possible terms to the proposed amendments to the above licence at Quinn Cement Ltd, Ballyconnell.

I understand that the applicant intends to apply to vary existing licence P037803 to include additional alternative fuels for use as co-incinerations. These alternative fuels include Meat and Bone Meal (MBM), Tyre Derived Fuel (TDF), Biomass Fuel, Sludges and Filter Cakes.

My objection relates specifically to the proposed use of Tyre Derived Fuel (TDF) and the potential detrimental atmospheric health effects of this carcinogenic fuel substitute. The pollutants discharged from the burning of TDF such as dioxins (PCDDs) and furans (PCDFs) are of grave concern to the health of the local population. On a fundamental level, I note that the UK Environmental Protection Agency has confirmed that pre-existing cement plant kilns are not suitable for the burning of Tyre Derived Fuel (TDF) without either being replaced or upgraded to allow "...optimum combustion and efficient pollution control..." (my emphasis added).

The current location of the existing cement plant (Licence P037803) is in a rural area which has already been the subject of significant heavy-industrial development. These developments include 2no. cement plants, numerous quarries, and a number of large-scale manufacturing facilities. The cumulative environmental impact of the proposed amendment, in conjunction with these existing activities has not been considered within the licence amendment application. No Ambient Air Quality data is available for this specific location and therefore a baseline of the existing air quality has not, and cannot, be established. It follows that the potential health impacts of these existing impacts cannot be accurately assessed, nor can the additional impacts resulting from the proposal to amend the existing licence.

I am concerned for my own health and for that of my family and local residents. Over the last number of years we have regularly been subjected to significant atmospheric pollution. All of these incidents have come as a direct result of accidental discharges from the existing cement plant.

You will note from my address that I am resident in Northern Ireland however my farm straddles the border and my home is one of the closest properties to the existing plant at just 450m. I would highlight that no public consultation has been carried out by the applicant with either local residents or the wider community. You will be aware that the existing plant is situated less than 200m from the international border and I note that no trans-boundary consultation has occurred with the statutory authorities in Northern Ireland. I understand that this is unlawful and blatantly contravenes the requirements of EU Law, as the proposed development is likely to have significant effects on the environment in another member state. On this basis, I respectfully suggest that any decision to approve the proposed development could not be upheld if it were challenged in a court of law.

I trust that these issues will be given full consideration during your assessment of the proposed licence amendment.

Yours sincerely,

James McCaffrey

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