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Sub ①



The Secretary
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford



mescaL &
associates

CONSULTING
ENVIRONMENTAL &
POLLUTION CONTROL
ENGINEERS

14/03/05

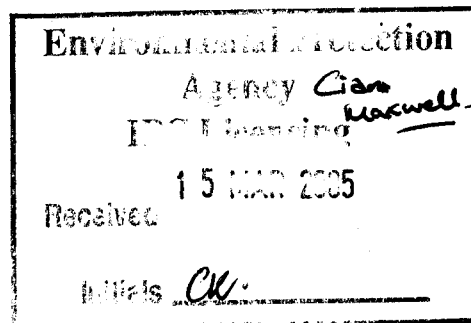
211-1

Dear Sir,

Re: AVR – Environmental Solutions Ltd
Waste Licence Application at Foxhole, Youghal, Co. Cork

We attach for your attention "Some Comments on Waste Licence Application for AVR- Environmental Solution Ltd at Foxhole, Youghal, Co. Cork".

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Faithfully Yours,

Michael Mescal

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c. Youghal Chamber of Tourism & Commerce

Some Comments on Waste Licence Application for AVR – Environmental Solutions Ltd. at Foxhole, Youghal, Co. Cork

1. Emissions to Atmosphere

1.1 There is clear under indication in this application of the quantity of air that would require treatment. The A2 maximum is estimated in the application of 70,000 Nm³/d. This may be what is estimated to come directly from the drier. There is no realistic estimate attempted on the airs to be treated in maintaining negative pressure on the insides of the buildings. This will be many times greater than 70,000 Nm³/d. This in turn will result in a considerably larger facility. **This will cause difficulty due to site constraints.**

Should the applicant opt for installing **thermal oxidation** then the planning application would come under “**contract incineration facility**” which would not allow it to be put there under the Cork County Development Plan. Thermal oxidation will fit more easily in the site.

We therefore see that the **either / or approach** on this section of the licence application should be **referred back by the EPA**. This should be done **before the An Bord Pleanala decision** and **An Bord Pleanala should be informed** that you are referring back to the applicant before An Bord Pleanala makes its decision.

1.2 **Many of the emissions referred to Table E.1 (iv) are treated too casually** as minor / fugitive. In particular we refer to sludge reception (E1), Waste Recovery and Transfer Building (E2) and Dried Sludge Storage (E8). These would have considerable odour associated and would not be categorized as minor / fugitive.

2. Noise Emissions

- 2.1 There is a considerable amount of heavy continuously running equipment associated with this development. The sound pressures given in **Table E.5(i) appear to be low**. The reference to these levels being “worst case scenario” is extremely questionable (Page 160).
- 2.2 The tabulated calculations in the EIS, pages 9 to 12, which read that overall noise contribution of the facility at the nearest sensitive resident in 25 dB(A). This is equivalent to the contribution of “a very quiet room” (IPC guidance note). Without getting into the details it is clear that this **claim is greatly exaggerated**. It calls seriously into question the reality of the claims made in the application.

3. Environmental Nuisances

- 3.1 “Dust Control”, page 161, states that no Construction and Demolition Waste will be accepted because it is “potential significant source of dust”. However the application looks for 10,000 tpa Construction and Demolition Waste, page 43. **This is a contradiction**.

4. Infrastructure & Operations

- 4.1 The presentation of the **handling of sludge and drying** of it is put down on simple drawings and a simple block diagram (page 64) together with a **brief half page description** on page 63. This is not a common application. Indeed there are **none the same and very few similar in Ireland**. We would emphasise that the performance of the proposed sludge handling and drying plant should be properly set out and not simply taken as read in the application.

Signed: 
Michael Mescal

Date: 14/03/05