

Submission to the  
Environmental Protection Agency  
regarding the application by  
Advanced Environmental Solutions (Ireland) Ltd  
to operate a waste facility at  
Kyletalesha Co Laois  
from the  
Derryguile and Kyletalesha Residents Association.



Reference application number: W0194 - 01 and W0194 - 02.

#### Background.

Advanced Environmental Solutions (Ireland) Limited ("AES") propose to build a biodegradable waste management facility in the Townsland of Kyletalesha, Co Laois. They are applying to the Environmental Protection Agency ("EPA") for a licence.

The proposed development is situated in an area that already has a number of waste management facilities, including two knackeries, a county council landfill facility, an experimental leachate treatment plant, a public recycling drop-off facility and a waste transfer station.

The surrounding area is rural in character, consisting of arable farmland, peat bog, forestry and rural dwellings, with over a dozen households in the immediate vicinity. The surrounding countryside is home to a busy rural community with a mix of farms, small businesses and dwelling houses.

This submission contains a number of objections, comments, proposals and corrections which we believe should be considered by the EPA in examining the AES application.

In preparing this submission we have looked at similar projects to the proposed facility, in particular we have reviewed the Environmental Impact Assessment accompanying the application by Greenstar to build a similar facility in County Cork ("the Greenstar EIS").

#### Existing waste limitation

The County Council have agreed with the Derryguile and Kyletalesha Residents Association that the volume of waste entering the area is limited to 38,000 tonnes. We have already agreed to increase this to 48,000 tonnes in order to facilitate the consolidated waste disposal needs of County Laois.

We object to the granting of a licence to the proposed facility on the grounds that it would result in an additional 59,999 tonnes of waste entering the area, in breach of existing agreements.

## False assumptions in the EIS

### Odour mitigation

The Environmental Impact Statement ("EIS") contains a number of flaws and unsubstantiated assumptions, however the one which causes us most concern is the implication that Laois County Council will be diverting all of its biodegradable waste into the AES facility, and thus partly addressing the odour problems affecting the surrounding area.

We are unaware of any arrangement between AES and Laois County Council to divert biodegradable waste from the Kyletalesha Landfill to the proposed facility. Thus the argument that this facility will increase the environmental standards by reducing the amount of biodegradable waste entering landfill is false.

### Low population

In their EIS AES state that there are less than 10 homes in the immediate vicinity. This is factually inaccurate. Furthermore the immediate environmental impact of the proposed facility is not limited to a one kilometre radius from the plant, especially when you consider the prevailing wind. There are at least 30 households immediately downwind of the proposed facility. The prevailing wind, influenced heavily by the Slieve Bloom Mountains, differs significantly from that experienced in Dublin Airport or Birr, source of the wind chart information used by AES.

### Traffic impact assessment

The Traffic impact assessment carried out on behalf of AES only considered the traffic volumes on the N80, and the short stretch of the L-2117-O between the N80 and the proposed facility. It was carried out after Easter time when a number of schools and businesses were closed.

No consideration has been given to the impact of an increased volume of Heavy Goods Vehicles on the secondary road network in the surrounding area. At present a significant number of the Heavy Goods Vehicles entering the current AES facility approach from the other end of the L-2117-O (as opposed to the N80 direction), causing considerable damage to the minor, unsuitable roads. An unscientific, but nonetheless accurate, survey by one resident counted nearly 20 HGV journeys in a 1 ½ hour period mid morning. Anecdotal evidence would suggest that this would be representative of the existing volume of traffic, indeed the noise monitoring data in the EIS confirms this, with noise data far higher than would be expected in a rural area (page reference 194 paragraph entitled N3).

Already there have been accidents on the secondary roads involving AES vehicles.

We object as we feel that all AES traffic should be confined to the N80 as the long, high and wide HGVs employed by AES are unsuitable for our rural road network.

EIS doesn't propose any alternative sites

The EIS fails to consider alternative sites in their EIS, commenting only that the Kyletalesha site meets the minimum criteria.

Negative impact on supply of clean water

The proposed facility will require 30,000 litres a day to operate, this will be provided by the mains water supply. No assessment has been made as to the impact this will have on the mains water supply.

Gas production

The proposed plant will generate methane gas, which will be used for electricity generation. As this gas is likely to be impure it will release pollutants when burnt. The use of air scrubber technology is now expected in such circumstances, however the EIS provides no details regarding the use of an air scrubber.

It is our understanding from the Greenstar EIS that it is necessary to burn gas by means of a flare when the gas pressure/volume is insufficient to power the electricity generating plant. The Greenstar EIS gives considerable detail as to the anticipated usage of this flare, and associated pollutants, however there is no information in the AES EIS on the operation of the flare, this is of concern as it is visually intrusive, and a source of pollutants. It is our belief that the application is thus inadequate in that it makes no reference to projected pollutants produced, contrary to the EU council directives 1999/30/EC and 2001/8/EC and the United Nations CLRTAP.

Fire control

The EIS makes no mention of fire prevention and control procedures; however we do note that the surface water drainage plans do not appear to have an area to contain fire fighting water runoff. Considering the proximity of the site to both forest land and peat land we consider the absence of planning for a fire to be a very serious flaw.

Monitoring of environmental emissions/methane systems

The Greenstar EIS gives considerable weight to the importance of monitoring the facility for leaks of gases, such as Methane, however the AES EIS doesn't. We are concerned that the absence of such a procedure in a plant operating within a community suggests that the clean and safe operation of the facility is not top priority.

## Decommissioning costs

The EIS does not give any consideration to the costs, either financial or environmental, of decommissioning the site. Considering the cost involved in constructing such a facility, the cost of restoring the site to a safe condition at the end of its life must be considerable, the EIS doesn't even mention this.

## Cumulative Health implications

There has been a statistically abnormal cluster of serious illnesses in the area. There is anecdotal evidence of at least fourteen cases of cancer within a three mile radius of the facility in the last five years. We object to the importation of any further waste as the cumulative impact on our health is unacceptable.

## Sustainability

One of the cornerstones of a sustainable policy is that it has the backing of the local community, has been developed in consultation with the local community.

AES were strongly opposed to holding public meetings however under pressure from the Derryguile and Kyletalesha Residents Association they did attend a public meeting; they have published no information, bar that necessary under planning/licensing legislation. They have not written to residents in the local area despite having been provided with a list of residents by the Derryguile and Kyletalesha Residents Association

Their EIS is difficult to read, especially when contrasted with the Greenstar EIS, which, despite being a much larger document, is much more open.

We are concerned that this lack of openness is symptomatic of a secretive attitude. This is of grave concern as we fear that in the event of a serious accident, or leak, at the proposed site that the local residents, ie those most at risk, will be the last to know that we are in danger.

## Buffer Zone

The proposed facility has a limited buffer zone along its immediate boundary with the public road (the L-2117-O). The intention of this buffer zone is to reduce the visual and aural impact of the facility.

We object to the granting of a licence as we believe that the proposed buffer zone is inadequate as the site is visible from all sides, including the N80, the Derryguile road, and of course, the Slieve Bloom Mountains Environment Park. Furthermore the prevailing wind is such that the aural impact of the proposed facility will be heard much further unless the buffer zone is expanded and redesigned to prevent this.

At the very least we would require that the entire facility is bounded by a buffer zone landscaped such that when planted with native deciduous trees the plant is completely screened on all sides. This will require forming a high wide sloping bank on all sides similar to the sound abatement techniques used on modern roads and airports. In order for the trees and associated flora and fauna to become adequately established we believe that this should be done before commencement of the construction phase of the development.

#### Building height

We object to the proposed facility on the grounds that the AES buildings on site are an order of magnitude higher and bigger (c. 2 acres) than any other building in the area and completely out of character with the rest of the area. Any building in excess of 6 metres above the existing ground height should be recessed into the ground by the excess.

#### Traffic restrictions

We object to the granting of any licence that does to make it a requirement that all goods vehicle journeys to do with the construction and operation of the proposed facility, with the exception of the one vehicle journey a week necessary for local waste collection, must enter and leave the facility from the N80. In addition all staff not living in the immediate area must approach the site from the N80.

#### Equity in waste volumes

We object to the granting of a licence on the grounds that there is no written agreement that the volume of biodegradable waste entering this proposed facility is matched by an equal (1:1) reduction in the amount of waste entering into the Kyletalesha Landfill in order to honour the existing agreements with the community, and in line with Government policy, and the Midlands Waste Management plan. As both licences are under the remit of the EPA it is within your power to implement this.

#### Visual impact of perimeter

The other waste management facilities in the area take pains to maintain the visual appearance of their premises, to the extent of cutting the grass, painting the walls and planting trees. At present AES do not attempt to match their neighbours standards, preferring bare concrete walls and discarded reinforced iron grids as fencing. We object to this licence being issued as the operators of the proposed facility take no steps to improve the visual appearance of their premises. We object to the use of high security fencing as it is visually obtrusive and out of character with the surrounding countryside.

Just because it handles rubbish doesn't mean it has to be ugly, afterall we all want to live in a pleasant environment.

## Opening hours

The EPA have made it a requirement of the Laois County Council landfill licence that the facility only operate between 8am and 4pm Monday to Saturday. We believe that a similar condition regarding the transport of material at the AES site should apply to the proposed facility and object to the granting of a licence if such a condition is not imposed.

Anne Dickinson, Sec.

Leo Dunne

Signed on behalf of the  
Derryguile and Kyalisha Residents Association

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