

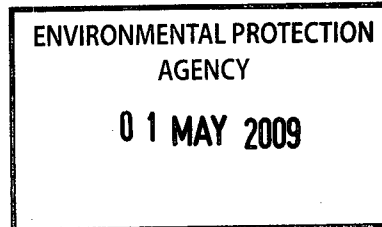


Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission no 1.
Environmental Health Service
Community Care Services
Co. Clinic
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Co. Meath

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Ms. Josephine Kennedy,
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27th April 2009

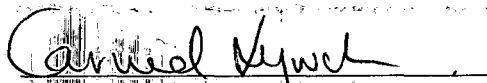
Re: W0167-02
Notification in accordance with Section 18(1) of the Waste Management Licensing Regulations, of a review application, in respect of Indaver Ireland Waste Management Facility at Carranstown, Duleek, Co. Meath.

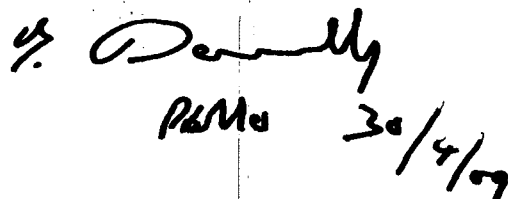
I have examined the environmental impact statement and the applicant's documents relating to a review of a waste licence by Indaver Ireland. I suggest the agency considers the following matters prior to making a decision:

1. The previous licence outlined a system of monitoring to be conducted by the applicant. The applicant would be given full responsibility for monitoring, assessing results and formulating reports on all environmental emissions from the development. Independent monitoring should be a requirement of the licence and should be conducted by the EPA or consultants employed on behalf of the EPA.
2. The World Health Organisation fact sheet on 'Dioxins and their effects on Human Health' states that dioxins tend to bio-accumulate in the food chain. The Food Safety Authority of Ireland Report 'Waste Incineration and Possible Contamination of the Food Supply with Dioxins', 2003 recommends in order to maximise consumer protection, rigorous monitoring programmes must be maintained. A monitoring regime for dioxins in the surrounding environment should be incorporated into the licence.
3. On page 2-26 of the EIS, the applicant specifically refers to the World Health Organisation, Site Selection for New Hazardous Waste Management Facilities, 1993, stating that step 1 eliminates unsatisfactory areas and does not include the Carranstown site. The publication relates to hazardous waste management facilities, however, as the applicant states in the EIS, 'many of the site selection criteria contained therein can be usefully applied to non-hazardous facilities'. The first step

in this process is the elimination of unsatisfactory areas. Areas with limestone deposits and areas critical for aquifer recharge are deemed unsuitable. These characteristics apply to the site at Carranstown. The applicant has not addressed this matter.

4. A large scale dewatering scheme is in operation at Platin Cement Works adjacent to this site, the applicant has stated that the ground water beneath the site is influenced by the cone of depression in the quarry. Further ground water pumping from this body is proposed to supply the East Meath and South Louth public water supplies. Further abstraction as proposed by the applicant may have a serious impact on this ground water body. Perhaps the applicant should explore the feasibility of supplying water to the site from the dewatering operation at Platin Cement Works.
5. The agency should consider implementing a strategy for monitoring local wells in the area to ensure that this development does not have a significant adverse effect on the quantity or quality of local private water supplies.
The location and depth of the required groundwater boreholes, necessary in order to obtain representative samples, should be specified in the licence.
The groundwater monitoring regime should include analysis of microbiological and hydrocarbon parameters. The monitoring frequency and scope of sampling should be sufficient to permit a full assessment of the quality of groundwater in the area.
6. The applicant carried out background noise monitoring which indicated that noise levels already exceed EPA Guideline limits. The applicant states the development will operate within EPA Limits at nearest noise sensitive locations. The applicant should clarify this matter.
7. The main wastes arising from the proposed facility would be bottom ash, boiler ash and flue gas residues. Given the nature of municipal solid waste and the diversity of its components how will the applicant determine the hazardous nature of waste for appropriate treatment/disposal?


Carmel Lynch
Environmental Health Officer


P&Ms 30/4/09