

Balgathern
Drogheda
County Louth
11 July 2012

Reference WO 167-03

Applicant : Indaver Ireland Limited.

I wish to make observations in relation to the Application by Indaver Ireland Ltd for a Hazardous Waste Licence

Public Health:

It is worrying that no base line health study in relation to population and local area has been conducted. A condition should be imposed on parameters agreed with the HSE and carried out by an independent body. Such a Study should be conducted regardless of the success or otherwise of the current application.

Application:

It is submitted that it is incumbent on the EPA that such an important step in relation to National Waste Management Policy is based on suitable and appropriate technology.

- This application is in relation to **Unsuitable Technology** for aspects of the planned waste stream.. The application states in the Environmental report chapter 5

5.6.2 Moving Grate Incinerator

The new waste streams proposed have been selected based on the successful treatment of such wastes in similar grate furnace technology throughout Europe. Hence, the waste streams proposed do not pose a difficulty for the grate furnace which is a proven robust technology. Grate furnace installations such as the one owned by AVR in Rotterdam and the Ekokem plant in Finland are taking similar waste types successfully.

This paragraph would seem to suggest that Moving Grate Incineration is used in Ekokem for similar Hazardous waste. This is incorrect. Please see the following from wastecontaminationworld.com in relation to Ekokem

Incineration line 2 (Rotary Kiln) is meant for hazardous waste incineration, but it is used also for various kinds of solid and liquid wastes. Middle temperature kiln is mainly used for solvent and oil contaminated soil remediation.

<http://www.waste-management-world.com/index/display/article-display/1382950763/articles/waste-management-world/volume-11/issue-2/features/emission-cont>

(2)

A further Reference from BIC group : The BIC group designs and installs all types of incinerators.

The medical waste incinerator is a high temperature kiln. Biohasardous waste such as medical and hospital waste can only be totally disinfected by thermal treatment. To be sure of total disinfection, the temperature in the combustion chamber has to exceed 1000 degrees C. A rotary kiln incinerator is the most used technology for the destruction of medical waste, because of its versatility, its continuous operation and because of its self cleaning properties (no need for inside cleaning)

http://www.bicgroup.com.sg/rotary_kiln_incinerator.php

It is clear that while a revenue generating opportunity presently exists for the incineration of hazardous waste and that an economic argument can be made that the **technology is not the most suitable and the local and national interest is best served by ensuring an incentive remains for the construction of a specific hazardous Waste Incinerator using state of the art technology.**

The applicant makes the case that Ekokem is the template that they are following therefore it is incumbent on the EPA to satisfy itself as to the workings of that particular facility and its relevance to the current application.

Yours Sincerely

Michael O'Dowd

Ann Kehoe

From: Licensing Staff
Sent: 12 July 2012 08:38
To: Ann Kehoe
Subject: FW: WO-167/03
Attachments: The application is in relation to Unsuitable Technology for the planned waste stream (3).doc

Rec'd in Licensing inbox

From: Michael ODowd [<mailto:modowd@mail.com>]
Sent: 11 July 2012 19:20
To: Wexford Receptionist; Licensing Staff
Subject: WO-167/03

Please see observations in relation to WO-167/03

Michael O'Dowd

-

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

For inspection purposes only.
Consent of copyright owner required for any other use.

For inspection purposes only.
Consent of copyright owner required for any other use.