

Sub ⑦

Louth And Meath Health Protection Group;

EPA.
Johnstown Castle Estate,
Wexford,
Ireland.

c/o Pat O'Brien
East Commons
Station Road
Duleek;
Co Meath

EPA Reference No WO167-03
Planning Reference No PA0026

Re Indaver Application Proposal to burn an extra 20,000 tons of hazardous waste,
Which seems to include various amounts of paint, and medical waste etc/

20th June 2012

To Whom It May Concern:

We as a community and members of the above named group, are extremely concerned re the above application, and Indavers intentions to impose the extra risk of burning an extra 20,000 tons of hazardous waste within there existing municipal, household waste incinerator, the same incinerator they told us at various hearings with the EPA, And An Board Pleanala, in the past, that was not fit or designed to burn hazardous waste, of any type, and in doing so promised the community and both agencies that they would never seek to burn such waste here, and that it would only be house hold waste collected within the north east area that would be burnt on site.

We as a community strongly opposed the plans to build a waste incinerator within this area over a number of years, some 26,000 petitioned signatures, and over 500 individual objections, through the various stages, including planning within Meath Co Council, oral hearings re both An Board Pleanala, and the EPA, And also with a Judicial Review within the legal system.

Alas at the end of all that we were left with having to accept that we would have a toxic waste incinerator imposed on us regardless of our fears or concerns, Limited under strict conditions and regulations that would be independently checked on a regular basis by the E.P.A and others, we were told, this we would contend is bad enough, but now to try and extend that out further to include hazardous waste is just totally unacceptable.

Mixed Toxic emissions from incinerators are extremely dangerous and difficult to quantify and take time to show there hand re health outcomes in regions concerned, but any increase in the emission levels of dioxins, furans, and metallics as number one cancer causing agents, is the cause of grave concern, and within this proposed development we would be concerned , that the levels of overall toxic emissions will increase substantially, and with the burning of medical and paint waste, included, would see increased levels of Cadmium, Chromium, Antimony, Mercury, emissions, which now must also be factored into the aquasion, Thus increasing the risk health wise for all the people living within the area dramatically.

The company talk of safe levels of emissions, but what can be described as a safe level of any toxic emissions that is rated cancer causing carcinogenic no 1 agent, Many of these substances stay in the ground / water for thousands of years, and return to us via the food chain, in particular in dairy food like meat, milk, cheese, etc And given **that we live in a high agricultural area**, this is of grave concern to all involved.

If we have a situation here of increased levels of toxic hazardous emissions, as we fear, this could have serious effects on our agriculture industry, now and into the future.

Who is going to want to source food from a contaminated supply region, and once tainted with that image, it will take a long time to get our clean food supply image back to the levels they currently are at.

Within our region as it is, we already have very high levels of various types of cancer, and many other serious diseases recorded as well, and this proposal will in our opinion only increase that risk to an even higher and unacceptable level now and into the future,

Just for the record we don't believe there is any safe levels of any toxic emissions from any of these incenerator plants, here or elsewhere, as the records show re the list of accidents associated with this technology throughout the world, which included major problems in France, England, Holland, Argentina, Scotland, Arkansas, And of course Belgium, The home of the company involved.

They have been described as state of the art, we believe that should be state of the art, as they seem to be riddled with various problems, accidents, malfunctions, and of course human errors, which this community already have to suffer from, but have no desire to increase that level of risk any further.

Traffic;

Within the previous licence and planning permission the issue of traffic management around this plant was quite contentious, and to this day remains so, large amounts of heavy traffic travelling to and from plant coming through the village of Duleek, including from areas like kentstown, where we believed there were restrictions on, making life very difficult and dangerous for everybody living within area.

We have no doubt if this extra tonnage application is accepted that to will hauled through the streets of our village as well, thus making life from a traffic point of view almost intolerable, and a serious accident waiting to happen in the future.

As part of previous application a bye pass of Duleek was promised by Meath Co Council, within Meath Community Development plan, and your inspector within her approval, with conditions, highlights the need for same, see section 19 within her report, and 19.11 dealing with traffic, and reference to Planning 17.126307, to deal with expected extra traffic burned on area involved, Council talked of fast tracking

bye pass plans in 2007, and while agreed site has been identified and located, no funding for same seems to have been found at present, making this application premature in nature, to say the least.

Perhaps if this company are so intent on expanding they should be made contribute funds re this bye pass, in order to at least deal with the serious traffic problems associated with same, and it would be our opinion that no such extension should be accepted or considered, until such time as this bye pass is completed.

Aquifer;

As outlined on previous application, this plant is on old prime historical agricultural lands, also in a major limestone area, zoned totally unsuitable by the WHO, it is, shown to be extremely vulnerable, and has within it one of the largest aquifers in the country **supplying water for thousands of people within this area**. And while we are very concerned at existing risk levels re current state, we don't wish to expand that risk any further by allowing the burning, handling, delivery, and it seems storage of hazardous waste on site, giving the history as outlined, that in our opinion would be just looking for trouble on a huge scale, giving the huge risk of accidental contamination to water supplies for entire area.

Hazardous Waste Disposal;

Another issue of contention is the disposal of the incinerator waste itself, some 33 per cent approx of what is burnt, must be disposed off safely, there non toxic ash we are told is disposed off in local land fill in Collon, what about the toxic ash, where is it going and who is in charge of testing and regulating same, is it the company themselves, and how is this separation process managed in reality,

Within there initial application company stated that the ash can be treated in an ash recovery plant, to render it suitable for use or for landfill, no such treatment has ever emerged it seems, no details re recovery process, process method, or plant location, these among other items were questions asked by the NEHB at the time and to this day remain unanswered, to the best of our knowledge.

There is also the issue of further hazardous waste from incinerator having to be disposed off, highly toxic in itself, cubic tons of various pollutants, various flue gas cleaning residues, including hazardous ash.

How much annually is required and how and where is that currently been disposed off, and what plans for same into the future.

Moving into the burning of hazardous waste, even at this first phase of 20,000 tons Will further add to the load of disposable hazardous waste, and the problems of identifying same, sorting, screening, separating etc, how exactly does the company intend to do all of the above, and not compromise even further the existing regulations and controls centred around the first licence and planning approvals.

Base Line Study;

Among the things the local community and its elected officials called for prior to this plant moving into operation mode was a comprehensive base line study to be done on all existing emission levels in area, to indicate current levels as they were then, and to compare and update same on a regular basis to help bring some confidence to people

living within the area, re any possible health implications, and of course any possible negative impact on agriculture production.

This again we sadly report has not been done, and as a result we are left fully exposed to all the elements coming from said incinerator, with only the companies word in general to comfort our existing and future concerns re all of there emissions.

Again we call for this independent base line study to be completed, and the company if required to help fund cost of same, on an annual and regular basis, and again we would hope no further extension be permitted until this task has been completed.

As Dr Anthony Staines pointed out within first phase application, the only independent health research study done on incineration within this country, by the health research board in 2003, indicated that Ireland had insufficient resources to carry out adequate risk assessment for waste incinerators, neither the personnel, nor the dedicated resources have been made available.

Furthermore Irish health information systems cannot support routine monitoring of the health of people living near waste incinerators, and that there was an urgent need to develop all of the above, first, before even considering going down this road.

Again we would contend that this application to further develop and expand this operation creates even greater risk to everybody involved, and that these studies pointed out by Dr Anthony Staines and the HRB, need to be put in place to provide any confidence for the general public going forward, before any further extension of this plant is even considered let alone granted.

Our sister group The No Incineration Alliance with whom we joined force's to oppose the original application, within its appeal, provided a very detailed list of reasons and strong concerns re the original application and licence, it is an excellent application in its own right , and a great source of information.

Now re this extension application we would ask you to completely review this particular application as part of your process, dated 17th September, 2006, as it still to this day contains many reasons why this new application should be rejected, and rather that us just simply re hash them all again, we simply ask that you consider all of the relevant information within same, especially the report within from the British Society for Ecological Medicine, and the WHO report on Air Pollution , both dealing with the health effects and dangers of waste incinerators in general, before making your final decision.

Recycling Centre;

The original application and approval also contained a plan for the development of a community recycling park, at this moment in time there is no sign of same or even any talk of developing such a facility, this was one of the few positive things within original plans, and is still urgently required within region.

For what its worth anybody interested in doing there own recycling must either pay for a very expensive private service, or travel to either Navan Or Drogheda to deliver

there own separated and recycled items, again we feel this is something that should be progressed and developed via company and the council, before any future development plans are agreed or accepted.

EPA Regional Office In Area;

We note that the EPA have regional offices in various other parts of the country, including, Limerick, Westmeath, And Cork, and thus given the amount of heavy industrial development granted and licensed within this region in recent times, it is something we have been calling for here, for some considerable time now.

There is no shortage of office space in area, that could be rented, for same, which in turn could be staffed by your agency, to monitor / check these licensed installations, on a regular basis, night and day and unannounced preferably.

Assuming of course that the financial resources to provide same can be found, provide and sustained in the long term.

Given that we now have the first waste incinerator in Ireland here, now looking to expand there activities into hazardous waste materials, Irish Cement Factory close by, also expanding there plans re burning of mixed waste materials, [recently granted] proposed power plant, also approved, plus various other heavy industries in region, we feel this is now the minimum of what's required to help bring any level of confidence to people living and working in region, re protection of there health, well being, and environmental concerns in the longer term.

Individual company regulation is seen as little or no regulation, and a proper independent on site unannounced visits system is what is required now, and if this application is to be approved, then **this idea should be given serious consideration**, even if it means the companies involved having to help provide some of the finances required to pay for same.

European Court Of Justice;

We note recent decision ECJ Case 50/09 on 3/3/2011, Re lack of involvement by the EPA at planning stage plus the separation of planning and licensing procedures.

We feel this is very relevant to this application, and we reserve the right to appeal to the European authorities re same, if necessary.

Note;

We also have some concerns re the fact that Laura Burke ex project manager of Indaver, Company Involved, is now general director of EPA, and as such we feel her position re this application is compromised.

We do not wish to personalize any of this, and accept that everybody is entitled to move within various work situations, but we feel in the interest of fairness, and transparency, she should distance herself from this application and the decision making process within.

Conclusion;

Finally we ask that you reject this application from Indaver, to expand there operations into burning and storing hazardous waste on this site, for all the reasons above mentioned, which includes there initial promise to this community, of never intending to do so now or in the future, and that any plans they have for hazardous waste were consigned to plans to build separate facility elsewhere in country.

We contend that is exactly what they should seek to do, if they so wish, this community and its peoples have accepted more than there fair share and all the health and environmental risks involved, enough is more than enough, and we sincerely hope after due consideration you and your board will agree.

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Ann Kehoe

From: Patrick O'Brien <kpj@gofree.indigo.ie>
Sent: 12 July 2012 12:47
To: Licensing Staff
Subject: Emailing: Louth And Meath Health Protection Group
Attachments: Louth And Meath Health Protection Group.doc

The message is ready to be sent with the following file or link attachments:
Louth And Meath Health Protection Group Submission re Indaver Incinerator Plans,
RefNo WO167-03.

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