

Environmental Protection Agency

21 SEP 2012

OFFICE OF ENVIRONMENTAL
ENFORCEMENT
ACTIVELYCaulstown,
Drogheda Road,
DULEEK, Co Meath.
Tel; 041 5828663
14th SEP 2012 DUBLIN.

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Inspector Patrick Kenny,
EPA Headquarters,
P.O. Box 3000,
Johnstown Castle Estate,
CO. WEXFORD.Main File _____
Public File _____
Evaluation File _____
Date _____
For Attention of InspectorRe; Waste Licence Review W0167-03
Applicant: Indaver Ireland Ltd.
Location of Facility: Carranstown, Duleek, Co Meath.

Dear Sir,

On behalf of the Kavanagh Family and the Resident's of the adjacent area we wish to register our complaints and observations in connection with the above for your attention.

Those of us who live in the frontline of the Emissions, Noise and Odours from this facility are entitled to be heard. This is where we live and we cant like Mr Ahern and Co go home and forget about it. The harsh reality is that we are now living in the shadow of a monster which could if its Masters are successful in their Appeal to the EPA for a review of their existing Waste Licence substantially Devalue our properties and change our lives forever.

Having advance notice of a Site Visit is all the Company needs to have things ship-shape when you call. Indeed human nature being what it is self-monitoring by this or any other Company will always result in reports that are below the threshold limits.

A promise at one stage to monitor the Noise Level in our area was typical of other promises made to us by the Company concerned. While they were on our property you could almost hear a pin drop 30 minutes after they left the problem was as bad as ever.

So it is not surprising that our experience of this Facility clearly suggests that nothing less than un-announced spot checks by the appropriate agencies will ensure that Health and Safety, the protection of the Environment and the rights of the Residents are given the priority they deserve by the Company concerned.

The Company's proposal (which bears no comparison to the enclosed leaflet) to increase its annual throughput, Incinerate Industrial and Toxic Waste, extend its hours of operation and have un-restricted hours for the Dispatch of Residues from the site is a clear indication of their intention to make this around the clock operation if possible.

If they are successful with their Application under these headings it will substantially increase the movement of traffic to and from the Site. It will also have a knock-on effect on Noise Levels on the densely populated main haul routes and would certainly be in breach of the W.H.O. Night Noise Guide Lines for Europe.

Re: Waste Licence Review W0167-3
Applicant: Indaver Ireland Ltd.
Location of Facility: Carranstown, Duleek, CoMeath.

While the Reports we have received from the Medical Profession, the Micro-Biologists and the Environmental Engineers in connection with the above maybe only circumstantial at this time they suggest that all things considered this is clearly a case where prevention would be better than cure.

Consequently we feel we are quite justified in requesting that the EPA give indept consideration to the following points before issuing a decision in this matter.

The details are as follows: -

- 1) Toxic Emissions: The estimated knock on effect to Public Health and Safety arising from the increase in Toxic Emissions to the atmosphere should this application be granted.
- 2) Health and Safety: The link between the unusually high incidence of Cancer cases in this area and the fact that we have one of the highest Death rates in the Country from respiratory illnesses due to Air Pollution is now well established.
- 3) Odour and Noise Emissions: The Company's attempts to improve the situation under these headings have so far been noticable by their absence.
- 4) Water Supply: Based on the fact that the Incinerator is located on a major Aquifer site supplying clean drinking water to many areas of East Meath this could be an area of real concern.
- 5) Chimney Stack Height: Observations would suggest that the present stack is not high enough as obnoxious fumes and debris etc. can be seen falling to Earth within a few hundred yards of the stack.
- 6) Monitoring: Based on the information in my letter under this heading this could be a major problem area for the EPA.
- 7) Agricultural Impact: The effect of the Toxic Emissions and fallout on what is a prime Agricultural region and its impact on the high value crops and livestock on lands in the area.
- 8) Waste Management: With the White-River Landfill due to close in the not too distant future any plans for the disposal of Toxic Waste could be a major problem area for the Company concerned.
- 9) Traffic Problems: In the absence of the proposed bypass and bearing in mind the Company's request for unrestricted hours of operation this could be another problem area for all concerned.
- 10) Emergency Response: What emergency response procedures the Company have in place to deal with the effects of any Emergency on the Environment.

While Jobs are important the Health and Quality of Life of everyone who lives and works in the greater Drogheda and East Meath area must be the over riding factor at all times. To ignore these harsh realities could have serious repercussions for all concerned and the EPA and the other Agencies involved should take the appropriate action in this matter before it is too late.

Sponsorship is just one of the tools used by Indaver for their own purposes. In this connection their decision to sponsor some of the Community Amenity and Environmental projects promoted by Meath and Louth County Councils has not escaped the attention of the Resident's. However, well intended these teaming up projects maybe they must at least be in conflict with the County Councils position as the Monitoring Authorities for their areas and should be discontinued forthwith.

It is also worth while noting that students at a local school who wanted to do a project on Air Pollution in the area were prevented from doing so because a local Company (who were the biggest offenders under this heading) had sponsored a few Computers for the School.

This is just another case of the people versus Big Business and the Establishment. It also highlights what Resident's like us are up against when we Campaign for our rights which includes Clean Air which is one of the basic elements of Life itself.


My Husband Joe a member of the Kavanagh Clan who was born and bred not far from the Cement Factory Site now has the problem of the Incinerator to cope with. A healthy man all his life the stress of trying to get some action from the Company concerned to sort out this problem has caused him Major Health problems for which he was Hospitalized recently.

Like many of the cases dealt with by the Courts in respect of one Local Industry it maybe 10 years down the line before the damage done to the Health of the people from these Toxic Emissions manifests itself, by then it may be too late so the time for action in this matter is now.

The case for the Resident's of the adjacent area is best summed up by no less a person than Mr Bart Verlinden the Plant Manager for the Company concerned. In a recent interview with the undersigned he has confirmed that he certainly would not like his family to have to live in such close proximity to the Indaver Ireland Facility. While he may in due course regret making it this clearly represents a Statement of Fact by a Company Employee which speaks for itself.

Letters of support from concerned Resident's of the general area for the stand we are taking in this matter (if they have not already been received by your office) are available on request. In the meantime the fact that we rest our case safe in the knowledge that whatever the outcome our submission will be considered strictly on its merits by the EPA. speaks for itself.

Yours sincerely,

 Nuala Kavanagh
JOE & NUALA KAVANAGH.

For and on behalf of the Resident's of the adjoining area:
As follows Claire Kavanagh, Margaret Smith, Dan & Tina Kavanagh
and Mary Leonard.

We'd like to hear your views

Indaver propose building a waste management facility at Carranstown, County Meath, promoting:

- The recycling of the local community's waste
- The recycling of non-hazardous industrial waste
- The recovery of energy from non-hazardous waste by incineration.

We want to build and operate this facility in consultation with the local community. As part of our communications programme we are holding a series of public information days where visitors will be able to view a model of the plant, obtain literature on our company and the project and meet the people involved with this project.



John Ahern
General Manager



Artists impression of the proposed facility

FreeFone: 1800 200646
www.indaver.ie

Public Information Days:

Thur 23rd & Fri 24th Nov

Wed 20th & Thur 20th Nov

Community Centre, Duleek

Rayna Valley Hotel, Drogheda

11.30am - 7pm