

**Dorota Richards**

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**From:** Michael O'Dowd <modowd@mail.com>  
**Sent:** 05 January 2015 12:51  
**To:** Licensing Staff  
**Subject:** New Third Party objection entered for Reg no: W0167-03. (Reference Number: W0167-03-150105125010)  
**Attachments:** EPA Indaver.doc  
**Importance:** High

**Objection submitted on:** 05/01/2015 12:50

**Title:**

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**Objector Type:** Third Party

**Oral Hearing:** No

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**Application for a review of Industrial Emissions Licence from Indaver Ireland Limited for the Carranstown Waste-to-Energy Facility, Duleek, Co. Meath. Licence Reg. 0167-03.**

**On behalf of the Louth And Meath Health Protection Group and the Drogheda Environmental Team I would like to make the following objections in relation to the above Proposal**

We will preface our objections by stating that in our opinion the E.P.A. needs to be aware that they serve the people and must be more meaningful for the ordinary citizen. In this geographical area public confidence in the EPA and planning authorities is an issue and there is a quiet and critical anger of processes that time and again favour the applicant. For instance in at least three separate applications before Bord Pleanala the Inspector found in part or in whole with objectors however on each occasion the Inspectors decision was overturned by the Board.

In the current application the EPA Inspectors report appears to accept the statements of the applicant without critically questioning them. For instance at the Bord Pleanala hearing it was accepted that the plant had a number of unplanned shutdowns . **Other instances of unquestioning acceptance of the applicant's arguments are detailed below.**

The first issue we wish to raise is concern in the Louth/East Meath area about health. Health patterns and local geography are an issue. Over last number of years there seems to be more medical problems within this area than ever before, including rising number of asthmatics, new and rising numbers of people suffering with leukaemia , something that used to be on the decline, not anymore,

New cases of it all around north east area now, young and old, nobody safe or immune from it; Please note Irish Times report 4th December 2014 and the reference that Ireland is No 4 in the European Cancer league. What role has the EPA in this . From the EPA mission statement *The Environmental Protection Agency is at the front line of environmental protection and policing. We ensure that Ireland's environment is protected, and we monitor changes in environmental trends to detect early warning signs of neglect or deterioration.*

So where are the EPA in relation to the deteriorating health in the region. Do people not matter to the EPA? Further health concerns are detailed below. We contend that this is an area with population health sensitivity due to unknown pre-existing reasons and it appears that it is not possible to get public administration to engage with this perspective at all. The E.P.A. and HSE are cases in point?

Add to this mix the question of the sea-dumping of munitions since 1920. Up to now authorities have treated this as being of no consequence. Many people talk about the impact of Sellafield and indeed have campaigned hard against it in the past, but sea-dumping is a more important issue because there is more human resilience to radiation than exposure to environmental TNT and break down products. The

pathway of environmental exposure to explosive products is beach activities and air-born sea-spray. Aggravating factors are sea currents tides, trawlers nets and the movement of displaced water.

#### Odour Abatement:

The Inspectors report states that the application that Mitigation measures are in place to ensure odour, nuisances are minimised. This is not the case as the report clearly states that:

· Indaver does not propose to maintain the odour abatement unit to extract odorous air from the bunker. ·

The Inspectors report erroneously states that there were no odour complaints in 2013 and there has been only one so far in 2014. There have been several complaints to Environmental Officers in Louth regarding odours from the Duleek area. The fact that these complaints have not been made to the EPA speaks volumes about their ( the EPA) lack of presence in one of the most industrialised areas in the country .

***We are calling for the odour abatement unit to extract odorous air from the bunker to remain in place and that the Licence should contain that condition.***

#### Best Available Technologies:

The Inspectors report references various Bref Reports but omits to reference WI BREF (08..2006) Reference Document on the Best Available Techniques for Waste Incineration August 2006. This document makes several important findings in relation to hazardous waste streams and the most appropriate technology. It clearly states that the BAT for hazardous waste is a rotary kiln incinerator.

The Inspectors report states that the Ekokem Incinerator referenced by Indaver in their application burns hazardous waste with less than 1% chlorine content. This is incorrect . The Moving Grate Incinerator burns MSW waste only. If MSW waste streams exceed the 1% chlorine they are considered hazardous waste and are burned in the Rotary Kiln incinerators.

Furthermore the Inspector states that · the applicant has selected the proposed new waste streams based on the successful treatment of such wastes in similar grate furnace technology in Europe, e.g. ..Ekokem in Finland

The waste streams burned in line 4 in Ekokem are different than that which is proposed by Indaver. For example :

*On incineration line 2, the waste is burned in a high-temperature rotary kiln (1200-1350°C) and on incineration line 3 in a medium-temperature rotary kiln (500-850°C). The waste to be burned on these lines is **municipal solid waste, solid and industrial waste, contaminated and treated wood.** Reference : Ekokem Website*

Indaver is suggesting that these wastes are dealt with on a moving grate incinerator so to suggest there is a direct comparison is incorrect.

**It is incumbent on the EPA to conduct its own research into the facilities and waste streams incinerated in Line 4 at Ekokem as it is presented as an example for this country to follow.** It is not good enough for the EPA to blindly accept what the applicant is stating.

#### **Bottom Ash;**

As the proposal is to burn hazardous waste the bottom ash itself should also be considered Hazardous as in other jurisdictions. Has the EPA a policy on this issue?

Would it not be prudent **prior to** a license being given to have a number of test burns so that sampling and analysis of the bottom ash would take place.

The requirement that Indaver should use accredited laboratories should be reinstated in the Licence for testing bottom Ash . It is unacceptable that the Inspectors recommendation of using ' accredited laboratory *where possible* would be even considered given that this is , in Irish terms, a novel process.

*The applicant should be required to have a number of test burns with the new mix of waste streams to ascertain the composition of the bottom ash prior to any licensing decision rather than subsequent to it. Accredited laboratories only should be accepted for testing all waste streams.*

#### **Increase in Waste Accepted:**

The reason given to increase the amount of waste received by Indaver is to increase the calorific value of what is being incinerated. Indaver is seeking to process more waste in order to achieve the design thermal output. **This is the only consideration that should be considered by the EPA and they have failed to do so. Additional aqueous waste will only serve to lower the calorific value. Why is it necessary to burn additional oil?**

A major question was asked by the Bord Pleanala (PM0004) and it is this : Are Indaver currently accepting 220,000 tpa and are they licensed to accept this amount? If not what sanctions have they faced from the EPA?

Medical Waste; Why is Medical Waste being licenced. Throughout the Bord Pleanala process the company indicated that they would not proceed with this type of waste. Indeed the extremely dubious report that the increase in waste would decrease traffic in the area was based on the fact that medical waste would not be accepted.

*We would reference the Bord Pleanala Inspectors report :* Here I must observe that, as I read the current alteration proposal by Indaver, there is no formal proposal to An Bord Pleanala to withdraw proposals for certain healthcare waste acceptance as permitted under PA0026.

**However Indaver has signalled its up-to-date intention not to pursue the acceptance of such waste, and the acceptance of such waste may be excluded from any EPA licence issued.** Traffic generation arising from healthcare waste acceptance was raised as a significant issue at the oral hearing on PA0026.

Who are we to believe?

The applicant has continuously 'played' the various regulatory authorities, changing their story to suit the circumstances. Another example being its original applications to An Bord Pleanála and EPA, promising it would never burn hazardous waste within this plant, saying that the plant did not have the capacity to deal with such waste, what's changed now, nothing is the answer, same plant, nothing new added, So why is the EPA Proposing to issue a licence to this company to burn hazardous waste there, **when the company themselves are** clearly on record on many occasions as saying it was 'Not designed to burn such waste', how can the EPA even think about granting a licence at this stage.

***Wastestreams from healthcare, hospitals, universities and veterinarians must not be licensed.***

### **Chromium**

Anyone with chemistry experience will tell you that Chromium is the most acutely dangerous chemical and where it is to be found there must be extra vigilance and that is why our colleague James Rounree has made a special point of raising it. I do not like the total Cr idea because the 6 valency Cr compounds on the whole are so much more dangerous. The incineration process produces both and we can expect the Cr IV and Cr VI to be apportioned on a 40/60 basis or a crude rule of thumb 50%. Decaying Chromates will produce free Chromic Acid in the air or in any moisture situation.

(Please refer to James submission at the Indaver Bord Pleanála Oral Hearing 2012. If CrVII is outside Irish industrial policy (in contradistinction to total Cr), remember we are introducing it to an area that is already possibly sensitised as has been outlined. In the list of heavy metals emitted Cr will be the greatest by volume.

### **Specific Health problem**

Also a new health problem we have never seen before, one that is very rare, a syndrome called Gullian – Barre, which attacks the immune system, can cripple and or kill people, and even if recovering leaves that person very vulnerable health wise going forward.

In most countries this is seen at 1 in 100,000 people, but here in the Duleek village alone, with only some 6,000 of a population, we have 4 confirmed cases, and two others been investigated as we speak.

We don't know what is causing this yet, but we believe it needs urgent attention and investigation by all the medical experts and government health agencies as soon as possible, and outlines why we should not be doing anything further that would compromise our health and our environment. ***Therefore the additional waste streams and tonnage should not be licensed until the cause of this clustering is determined.***

What ever the outcome of this proposal , **the EPA**, given all the industrial challenges that exist within this region, **must open a regional EPA office as soon as possible**, monitoring these plants from afar is simply not good enough,

They need on site management and regular day and unannounced nightly visits to bring any sort of confidence that they are complying with there licence conditions, self regulation as we have now, is equal to no regulation, and is simply not good enough, especially if the company is going to be allowed move into hazardous waste disposal, and also increase there tonnage anytime they like, without even the local community groups been informed properly re same.

What ever the outcome of this proposal , **the EPA**, given all the industrial challenges that exist within this region, **must open a regional EPA office as soon as possible**, monitoring these plants from afar is simply not good enough,

And who will take the responsibility when something goes wrong at this plant, one thing is for sure, The EPA cannot say they were not told, or warned of this situation, and possible health implications and Dangers that may come with it.

All the various community groups and individuals opposing this licence have and continue to make sure that all relevant authorities including the EPA are aware of these very important facts before making final decision re this particular licence;

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Co Louth

On behalf of ;  
***Drogheda Environmental Team***  
***Louth And Meath Health Protection Group***

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