

**Dorota Richards**



**From:** John Shortt <john.shortt@cycle.ie>  
**Sent:** 05 January 2015 11:48  
**To:** Licensing Staff  
**Subject:** New Third Party objection entered for Reg no: W0167-03. (Reference Number: W0167-03-150105114811)  
**Attachments:** letter to EPA.docx  
**Importance:** High

**Objection submitted on:** 05/01/2015 11:48  
**Title:** Mr  
**First Name:** John  
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**Objector Type:** Third Party  
**Oral Hearing:** No

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# HOLLYWOOD and DISTRICT CONSERVATION GROUP

Environmental Protection Agency  
Administration  
Environmental Licensing Programme  
Office of Climate, Licensing and Resource use  
PO Box 3000  
Johnstown Castle  
Co Wexford

Subject: WO167-03 Indaver

Date: January 4, 2015

Dear Sirs

We object to the granting of the above subject license on the following grounds.

1: the applicant has failed to provide a cradle to grave roadmap on treatment of both fly ash and bottom ash; therefore it is not possible to make a considered judgment on the information submitted. As a community whose lives will be severely impacted by this development, the lack of detail restricts our ability to fully assess the impact on our community. Therefore the EPA and the applicant are ignoring the natural rights of parties who may be impacted as a result of this development and on this basis alone the application before you should be rejected.

2: The application before the EPA is in conflict with the planning permission and the EPA cannot issue a license for activities which have no planning permission. Had the current proposal before the EPA been presented to An Bord Pleanala it is likely that the application would have been rejected and the community would have been allowed the opportunity to object during the planning process.

3: As the EPA are pursuing a non integrated approach to licensing and planning this is in contradiction to EU legislation and unacceptable to our community.

4: The applicant has not consulted with our community, again in breach of EPA and planning legislation.

Should the EPA ignore the above points,

We request that it be made a condition of the license that fine fraction stripping of ferrous and non-ferrous metal fractions, including lead, from bottom ash residue at the Carrenstown facility site be made a condition of the granting of a licence.

This is in conformity with the following stated overall objectives of the EIA Directive namely (2) the application of the precautionary principle, preventative action and rectification at source and at the earliest possible stage in all the technical planning and decision-making processes, and

(4) to achieve protection of the environment and the quality of life and  
(7) that the assessment be supplemented by appropriate information supplied by the public likely to be concerned by the project in question.

In this regard may we direct the inspector's attention to EC IPPC BREF 08-2006 Waste Incineration. The Executive Summary identifies "overall process residue production" as "a key environmental issue", and Section 4.6 deals with "Treatment techniques for solid residues".

The following are key points

- 4.6.1- "the pH value of fresh bottom ash often exceeds 12" and "as lead is amphoteric it can be dissolved at pH 11-12 and then be leached".
- It is clear therefore that the removal of metals from the bottom ash reduces the overall metal leachability and consequently the potential environmental hazard of land filling fresh bottom ash.

John Shortt, on behalf of Hollywood and District Conservation Group.

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**Chairperson: Paddy Boyle; Secretary: Fidelma Gaffney;**