

Environmental Protection Agency, Headquarters, PO Box 3000 Johnstown Castle Estate, Co. Wexford

OBJECTION to the granting of revised licence to Nurendale Ltd., Rathdrinagh, Beauparc, Navan.

Reg. No. W0140-04

We, the undersigned strongly object to the granting of this licence for the following reasons:

1. A disastrous history of non-compliance by Nurendale to conditions for granting of previous licence.

Nurendale did not comply with conditions for the granting of the previous licence and can be seen on a daily basis contravening previous conditions second for the safety of the people who live around the plant. This includes:

- Conviction in 15.9.2009 for illegal practice
- Sporadic fire outbreaks, two of which were serious. The major fire in 2012 caused widespread black smoke for over a week. (The cause and content for which we have never received a report or explanation.)
- Constant foul odours and other emissions
- Constant noise pollution at unsociable hours.
- Trucks accessing the site outside of set hours;
- Trucks accessing the site through the forecourt of the Petrol station and shop although this was prohibited by Meath County Council in 2014.

There have been over 12 incidences of non -compliance logged by the OEE since 2009. And, in spite of condition 12.2.3 Panda (Nurendale) has made no financial provision to cover environmental liabilities as required.

Therefore, while the EPA sets out conditions here "to ensure" the activities of Nurendale (Panda Waste) do not adversely affect the environment, we, the local residents, can see that this irresponsible behaviour is likely to continue. Panda's activities are not managed, operated or controlled in accordance with the previous conditions and for this reason they cannot be granted further licence to continue to contravene national, European and international environmental conditions.

2. Totally inappropriate and hazardous location:

(a) This plant is located in the middle of a neighbourhood! There are domestic homes surrounding the site and most of these are within close proximity to the plant. The minimum distance allowed between a plant of this size and someone's home, is 200 metres. (refer CRE 200 metres or HSE 250

metres) There are at least 5 homes within 30-50 metres of the site and there are at least another 17 homes within 300-500 metres. All our neighbours are at risk of air pollution already. As was stated clearly in your own inspector's report, "Odour and dust may arise at the installation and have potential to impact...beyond the boundary" Clearly, further expansion and developments of toxic activities will expose us to extreme risk of poisoned air and possibly water.

- (b) On this site, sharing a wall with the Nurendale plant, is not a "food depot" as is stated in the inspector's report. There is a Petrol station, a car wash, a restaurant, a Butcher shop, a hairdressers and a mini-supermarket! Siting a waste facility here is irresponsible.
 - The safety of preparing and serving raw and cooked foods is seriously compromised and human's health is put at risk, from all the vermin and flies, air and water pollution expected.
 - It is extremely dangerous to have flammable and combustible materials which have selfignited on previous occasions, - stored just behind the wall where members of the public are dealing and dispensing combustible fuels for their cars, lorries etc.
 - This license cannot be legally granted without an accurate and honest assessment of the setback distance for combusting.
 - Being the last eating place and second last petrol station before Dublin City Centre means there is constant traffic pulling into and out of the shops. The heavy trucks accessing the Panda site at all hours of the day and night make this cross roads extremely dangerous. There are constantly trucks parked on the sides of the road waiting to get in or out of the site and the shops. These trucks block views of on-coming traffic and it is only a matter of time before there is a serious fatal accident because of the siting of the Waste management plant right in the middle of this retail area.
 - Rathdrinagh Cross is an extremely busy intersection with very high traffic volumes particularly at rush hours. Traffic from the Kneckcommon road and the L1013 enter and exit the N2 with cross overs from either side. The increase in traffic volume is a huge concern with heavy Panda lorries (and now, "Mahon" and "Doyles" (Oxygen) trucks).

An industrial plant the size of the Panda plant must be located in an industrial zone, with easy access for emergency services, with all the health and safety infrastructure in place in the case of an industrial accident. It should never be licensed to operate where families, with children and elderly parents, are out visiting neighbours, socialising and shopping.

3) Environmental Impact Assessments need to take the whole plant into consideration:

Split decision making by the planning authority and the EPA has resulted in the project not properly assessed as a whole, in accordance with the Habitats Directive and the Environmental Impact Assessment Directive This is not acceptable and does not provide protection for the health and safety of those of us who live beside this enormous and growing industry. We believe a decision to grant approval for this project is then illegal under Irish and EU law.

If Nurendale now also owns Greyhound and Greenstar they are effectively the largest, waste collection and processing company in Ireland. The massive increase of waste that will be brought right into the heart of our neighbourhood. Licensing Nurendale to do this, in this location when they continue to ignore the conditions set out previously for managing less extensive activities would constitute a blatant dereliction in environmental protection and disregard for the health and safety of the people who live here.

All the water and waste from these retail outlets go into the same drains / waste outlets and need to be configured into the environmental measurements for potential contamination of the tributaries to the Boyne.

This licence must be considered in addition to all the other activity that is already going on in this locality. The increase in activity at this same site means increased tonal noise, bio aerosols,

chemical emissions, spillages and fires. This is an unmanageable level of risk that cannot be adequately monitored or coped with in a rural area such as this.

In conclusion, we would like to point out that the inspector's report states that "the conditions and emissions limits will ensure the environmental emissions will not lead to adverse impacts on human health" but we all know that this cannot be ensured. Particularly where the activity is so immense and dangerous and the monitoring and compliance is so low if at all, to even consider granting this license smacks of even lighter regulation than we have witnessed previously from the EPA. Therefore, we must most strenuously object to the granting of this licence and trust that *our* Environmental Protection Agency will indeed prioritise the needs and health of the environment and the community over the profits and short term employment statistics of big business.

Sincerely,

Bob McMahon

John pala

Greenhills,

Beauparc,

Navan

Nuala O'Donoghoe

Ballinlough,

Beauparc,

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end: Cheque €126.00.