

From:
Sent: 25 July 2016 10:23
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

● **Objection 1**

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

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Veronica Creagh

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From:
Sent: 25 July 2016 06:55
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Annette Moloney

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From:
Sent: 24 July 2016 07:47
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Kevin Rourke

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From:
Sent: 23 July 2016 21:52
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Susan Malee

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From:
Sent: 23 July 2016 21:07
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Lucy Murphy

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Sent: 23 July 2016 11:07
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licensing | Environmental Protection Agency

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Edmond MacCarthy

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From:
Sent: 23 July 2016 10:33
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Poppy Wilson

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From:
Sent: 23 July 2016 07:56
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Marguerite Ryan

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From:
Sent: 23 July 2016 02:15
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
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Sylvia O Shaughnessy

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From:
Sent: 23 July 2016 01:44
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

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Objection 11

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Dolours O Mahony

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From:
Sent: 23 July 2016 00:42
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Belinda Moore

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Patrick Doyle

Submission 10a 1089

From:
Sent: 23 July 2016 00:28
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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jane McLaughlin

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From:
Sent: 22 July 2016 23:01
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

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Kim Eustace

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From:
Sent: 22 July 2016 20:38
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Declan Clearv

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From:
Sent: 22 July 2016 16:02
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licensing | Environmental Protection Agency

To whom it may concern,

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Breda Micks

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Patrick Doyle

Submission 10 1085

From:
Sent: 22 July 2016 16:00
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

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Ciara Micks

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From:
Sent: 22 July 2016 15:59
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Anne Micks

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From:
Sent: 22 July 2016 14:40
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Lette Moloney

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From:
Sent: 22 July 2016 14:17
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Objection 7

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Objection 8

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Vincent Lee

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Patrick Doyle

Shannon 10a 10p

From:
Sent: 22 July 2016 13:48
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

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Nicholas Ward

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From:
Sent: 22 July 2016 11:53
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Gabriela Avram

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**ENVIRONMENTAL LICENSING
PROGRAMME, OES**

Submission No 1079 was

withdrawn on

16th January 2017

Any queries on this matter can be directed to:

Environmental Licensing Programme
Office of Environmental Sustainability,
PO Box 3000,
Johnstown Castle Estate,
County Wexford
Tel: Locall 1890 33 55 99 or 053 91 60600;
Fax: 053 91 60699.
Email: licensing@epa.ie

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From:
Sent: 22 July 2016 11:11
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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David Studer

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From:
Sent: 22 July 2016 10:55
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Meg O Flynn

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Patrick Doyle

Submission No 1076

From:
Sent: 22 July 2016 10:50
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Mikael Fernstrom

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From:
Sent: 22 July 2016 10:42
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Annmarie Ryan

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From:
Sent: 22 July 2016 10:39
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Deirdre Power

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From:
Sent: 22 July 2016 02:38
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Mary Gleeson

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From:
Sent: 21 July 2016 18:44
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

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Objection 3

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Niamh Marron

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From:
Sent: 21 July 2016 18:43
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Anne Marron

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Patrick Doyle

Subsission No 1070

From:
Sent: 21 July 2016 17:53
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Helena Close

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Patrick Doyle

Subs. No 1069

From:
Sent: 21 July 2016 17:23
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Mairin Power

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Public engagement

See EIS 4, where the District Electoral Division study area of Ballycummin has 17,481 persons. See EIS 1.11 public engagement, where only 500 booklets were distributed to local residents.

Table H.2 of the IE licence review details the storage of animal by-product 02 01 02, animal tissue waste. Page 10 of the Platin booklet details Meat and Bonemeal (MBM) as an alternative fuel. The Limerick booklet in EIS appendix 1.1 does not detail MBM as an alternative fuel. There may be an odour if MBM is being incinerated. If the P0029-05 licence application is to include MBM then this should also have been detailed in the Limerick brochure as part of the public engagement process.

Ultrafine Particles (UFP's)

See BAT BREF assessment page 17 where ICL will monitor particulates annually. PM10 and PM2.5 will be monitored but not PM0.1. Annual monitoring cannot record events where there are higher than normal PM emissions. This is a concern as Irish Cement Limited will be changing from a stable petcoke fuel process to a process where the fuels will be changed and/or mixed as required.

Several European doctors associations (including cross discipline experts such as physicians, environmental chemists and toxicologists) in June 2008 representing over 33,000 doctors wrote a keynote statement directly to the European Parliament citing widespread concerns on incinerator particle emissions and the absence of specific fine and ultrafine particle size monitoring or in depth industry/government epidemiological studies of these minute and invisible incinerator particle size emissions.

See

<https://web.archive.org/web/20090627175409/http://www.noharm.org/details.cfm?ID=1963&type=document>

Ultrafine particles are deposited in the lungs. See report detailing the relationship between UFP's and raised blood pressure in children below. This is huge concern when there is a playground and four schools with over 3000 children planned nearby.

<http://ehp.niehs.nih.gov/1408121/>

The co incinerator will use a bag filter but no specification for the bag filter has been provided. **The EPA must mandate the use of a bag filter of the correct specification to capture UFP's.**

See page 36 of ELRA table 9 risk analysis. There is no risk score for the release of particles to the atmosphere in the event of a tear in the bag filter.

Cement

A purpose built incinerator creates both bottom ash and fly ash. The bottom ash is typically used as an aggregate in concrete while the fly ash is hazardous (as it contains heavy metals) and must be disposed of. Irish Cement proposes to merge all ash within the cement. This cement will be used for our homes making our homes a potential hazardous waste storage area. Concrete blocks are semi permeable so with frost, heat, wind and rain there is now a risk that hazardous material will be released into our homes. This is a very worrying cement manufacturing trend. No data regarding the analysis of the cement toxicity vs. alternative fuel type has been included with this application. Irish Cement has been producing co-incineration cement in Platin for four years. One would assume that this data is now available. This laboratory analysis must be provided before all cement factories in Ireland change over to using alternative fuels.

Concerns of IBA (Incinerator Bottom Ash) use in Foam Concrete have been expressed by the UK Health and Safety Executive in 2010 following several construction and demolition explosions. In its guidance document, IBA is currently banned from use by the UK Highway Authority in concrete work until these incidents have been investigated.

See <http://www.standardsforhighways.co.uk/ians/pdfs/ian127r1.pdf>

While the UK has banned the use of Bottom Ash, Irish Cement Limerick proposes to add both the Bottom Ash and the more toxic Fly Ash to cement.

Ireland should evaluate the potential cement building/housing risks before approving this application.

Risk

I am a parent of two children. I manage risk to their health on a daily basis, risks such as hot water, stairs and cars on the road etc.

10 years ago when I lived in The Grange I spent a whole day cleaning my car after the October 2006 blow-out. I also had to bring my car to the Cement factory in July 2015 to get it cleaned after that blow out.

An accident interval of 9 years gives me little confidence that Irish cement can safely use waste as an alternative fuel. The health risk will be compounded by new incinerator systems and new employees. Future blow outs may also contain dioxins and UFP's.

This application introduces an extremely high risk to the health of my children.

Thank you for your consideration.

Yours sincerely,

Kevin Feeney

The day time (EIS table 9.5) and night time (EIS table 9.6) measurements are all dated on the 7th of May 2015. This one off measurement does not reflect the changing nature of the noise observed coming from the cement factory over the last number of years.

I must sleep with the windows closed and the window vents closed along with heavy curtains to reduce the noise level to a tolerable level.

I am concerned that the noise levels will be higher with the additional flow rates in Kiln 6, cement mill 6 and cement mill 7 (see Application Form Table A.3).

See EIS Volume 1, 9. Noise and vibration. The existing noise level at the nearest residential property is detailed at 39dB. A new major noise source - the kiln bypass cooling tower will increase this to 42dB. A 3dB increase is equivalent to a doubling of the sound intensity (W/m^2). This suggests that I will be unable to sleep with a doubling of the sound intensity, that's even ignoring the increased flow rates.

EIS 9.2.6.1 details the current P0029-03 licence 55dB daytime limit and 45dB night time limit (EIS table 9.2). Of all emissions surely noise is one of the easiest to measure. Please measure the noise outside my house with respect to these noise limits. Can these levels be compared to the 2007 baseline levels? What changed in 2014?

Dust

I perceive that my car is regularly covered in dust.

See Table A.3 Dust monitoring for 2015 where a large number of readings were contaminated. Elevated measurements above $240mg/m^2/day$ are explained by sample contamination.

I perceive that there are additional dust outbursts which are not recorded vs. the $240mg/m^2/day$ limit. To have confidence in dust emissions data, volume data must be gathered and from locations outside cement factory grounds where the dust falls to the ground, i.e. not from locations that may be inside the plume.

Reports

A large number of the ordinance survey images (e.g. Atmospheric emissions report Figure 1 and Figure 2, Application form Figure 1.2, EIS figure 8.1 and figure 8.2, figure 9.1 to list a few) submitted for P0029-05 IE licence are dated to 2016 but do not contain the Ard Aulin or Sli Na Manach housing estates even though these estates have been built circa 2006. This could be viewed as under reporting the number of people living within a 1km of the cement factory. All reports submitted by and on behalf of Irish Cement should use the latest 2016 ordinance survey maps.

19th July 2016.

Regarding:

Register Number: **P0029-05**

Applicant Name: **Irish Cement Limited**

I would like to object to this application based on the following observations:

Noise
Dust
Reports
Public engagement
Ultrafine Particles
Cement
Risk

Noise

I moved to Ard Aulin in October 2007. I never heard any noise in my housing estate until January 2014 when I heard noise from the direction of the cement factory. On some nights I had to use ear plugs so that I could sleep. I reported this in January 2014 to Seamus Breen the environmental manager. A phone call with Seamus on the 30th of January 2014 detailed that nothing noticeable was observed.

I attended a public meeting in the South court in December 2015 and spoke with Brian Gilmore. I raised my concerns regarding noise to Brian. Seamus Breen detailed that there was an attempt to measure noise in my housing estate but some residents were concerned regarding the equipment. I detailed that I would have no concerns if the noise level was measured outside my house. I was asked to leave my details on an attendance list so that I could be contacted, which I did.

I reported an increased noise level to the cement factory in January 2016. The Environmental Engineer Emmet Clarke emailed me on the 7th of January 2016 detailing that Seamus Breen was not on site and that nothing unusual occurred during the time I had specified.

I note that on Page 15 of the ARUP ELRA, 2.3.4 complaints history that no noise complaints are recorded. IE Licence review Table 1 details complaints from 2013 to 2015 but there is no row or data for 2015. There were no complaints for noise recorded for 2013 or 2014. The 2015 complaint details are recent and relevant but not included.

I believe that the baseline noise level from the cement factory has increased. I believe on occasion noise levels are higher than this baseline. Over the two weeks 13th to 27th of June 2106 for example there was continuous noise disturbance both day and night.

Patrick Doyle

1068

From: Kevin Feeney <
Sent: 19 July 2016 23:03
To: Licensing Staff
Subject: New submission entered for Reg no: P0029-05. (Reference Number: P0029-05-160719110252)
Attachments: EPA submission P0029-05.pdf
Importance: High

Title: Mr
First Name: Kevin
SurName: Feeney
Organisation Name:

Address Line 1:

Address Line 2:

Address Line 3:

County:

Post Code:

Email:

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From:
Sent: 19 July 2016 12:54
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Mark Cumming

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From:
Sent: 18 July 2016 10:18
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Hugh Carroll

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From:
Sent: 15 July 2016 11:24
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

Due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves.

Objection 4

The kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Objection 6

I'm concerned that the storage of 1,000's of tonnes of tyres represents a fire risk not to mention the risk of contamination of the Gouldavoher aquifer as a consequence of any fire.

Objection 7

I'm concerned that the storage of 1,000's of tonnes of bio-solids and industrial solvents risks leaching of contaminant into the Gouldavoher aquifer, polluting the ground-water and the Shannon Estuary.

Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

Objection 9

I'm concerned by the possibility of noxious odours from the storage and incineration of solvents, sludge and industrial solvents especially in light of the EPA's inability to measure and monitor these risks.

Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

renate helnwein

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Christina Kavanagh

Subm No: 1064

From:
Sent: 13 July 2016 13:53
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

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Geraldine McNamara

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From:
Sent: 13 July 2016 01:08
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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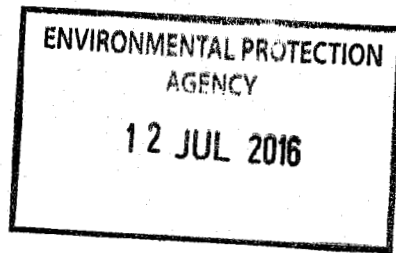
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Brendan O shea

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Subm No. 1062



Residents Alliance for a Clean Environment

Mungret Village

Co. Limerick

Date: 28/06/2016

*** This Objection was also submitted online but the attached petition made the file size too big. Here is the hard copy as promised ***

To: The Environmental Protection Agency

Subject: Opposition to Licence P0029-05

Reference number:	P0029-05
Applicant:	Irish Cement Factory
Address:	Castlemungret, Mungret, Co. Limerick

Dear Sir/Madam,

Please find our objections to the incineration of tyres and other waste material at the Irish Cement factory in Castlemungret, Mungret, Co Limerick.

The objections are based on 12 areas of concern:

1. Seveso Directive:

Article 12 of the Seveso Directive [2003/105/EC] requires that for Member States 'the objectives of preventing major accidents and limiting the consequences of such accidents are taken into account in their land use policies and/or other relevant policies'

-It states that this is to be achieved by controls on the siting of new establishments and modifications to existing establishments, as well as developments in the vicinity of such establishments.

-Member States are required to ensure that account is taken of the long-term need to maintain appropriate distances between establishments and **residential areas, buildings and areas of public use, major transport routes as far as possible, recreational areas and areas of particular natural sensitivity or interest.**

-The Member States are also required to ensure that technical advice on the risks from an establishment is available when planning decisions are being made.

- No such risk assessment has been undertaken in this application. Given that Irish Cement LTD (ICL) Mungret have a poor record when it come to accidents (blow outs) and that the

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nature of business is changing to include higher risk hazardous raw material and to burn high risk hazardous waste, any EPA Licence decision should be delayed until an independent risk assessment is conducted.

- This proposed application will have warehouses storing hazardous raw material (pulverised fly ash). The site will also house hazardous waste (Recovered Fuel), Tires and Plastics. The site is next to a Gas pipeline. The site also uses explosives.

- If there were a hazardous waste (secondary liquid fuel) or Tyre or plastic fire it would have detrimental health consequences for the whole area, city and county, releasing the most harmful toxins into the air.

- ICL Mungret have a poor record with Kiln Upsets (Blowouts) with their current reasonably stable fuel. Burning different type of waste gives rise to potential fluctuations in temperatures in the Kiln which could contribute to further blowouts or emissions not being burned off sufficiently.

- Cement kilns are not designed, constructed, operated, or intended to be used as incinerators (Dr Neil Carman 1997).

- Cement kilns are not designed to have major fail-safe combustion devices such as large afterburners that all state-of-the-art incinerators must have (Dr Neil Carman 1997).

- Given the waste material they are planning to burn, in the event of a combustion upset (blowout), the consequences for damage to health are increased due to the unfiltered toxins that would be released.

- The close proximity of Schools, playgrounds, recreational parks, sports fields, numerous residential areas, **University hospital Limerick (with a new cystic fibrosis unit), the Dialysis Unit on the dock road, a new children's respite care home**, the river, the waste water treatment plant, the electrical sub-station and local agriculture all need to be considered in the event of an accident.

2. Particle Emissions:

- Particle pollution (emissions) - especially fine particles - contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Numerous scientific studies (cited by US EPA) have linked particle pollution exposure to a variety of problems, including:

- premature death in people with heart or lung disease,
- nonfatal heart attacks, irregular heartbeat,
- aggravated asthma, decreased lung function, and increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing.

People with heart or lung diseases, **children and older adults are the most likely to be affected by particle pollution exposure**. However, even if you are healthy, you may experience temporary symptoms from exposure to elevated levels of particle pollution. (US Environmental Protection Agency, 2016)

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- Burning waste has been shown to produce higher heavy metal emissions but also has the potential for other harmful emissions like dioxins and furans. These toxins cause health problems like birth defects, cancer and heart and lung problems
- A study on emissions by the European Commission showed that combustion in a cement kiln of one ton of RDF(Plastics, Cardboard, Paper and textiles), compared to hard coal, caused a significant **increase in the emission of mercury, lead, and cadmium**(carcinogen). (European Commission, Directorate General Environment,(2003). 'Refuse Derived Fuels, current practice and perspectives'. Final report.)
- ICL Mungret has given no details as to what condition their emission controls filters are in ? their age ? or their percentage effectiveness ?
- Emission filter controls in ICL Mungret are incapable of filtering particles below a certain threshold regardless of their effectiveness
- Dust from ICL Mungret is a constant problem, not just from blowouts. Local residents have been plagued over the years with dust, having to constantly clean windows and cars. Local people with respiratory problems have complained of their condition being aggravated by this dust. Often this dust is so fine that it is invisible to the naked eye but by rubbing ones finger on a window it can be felt. If you are to take house windows for example, this dust is unlikely to come from any other source as often only the windows facing the ICL facility will be affected and usually do not face a road. More information is needed as to where this dust is coming from or why it is not being reported. If it is release valves to keep the kiln temperatures under control then this is releasing unfiltered carcinogenic toxins into the air. If it is dust from other processes then it is potentially causing other serious health problems especially for children.
- With proximity of the schools, hospitals and outdoor recreational areas, I highlight again **children, people with medical issues and older adults are the most likely to be affected by particle pollution exposure**

3. Environmental Impact Statement (EIS) Inadequate:

- The Environmental Impact Statement (EIS) provided by ICL Mungret for the withdrawn P0029-04 license application to burn 210,000 tons of waste shows that proposed emissions(table 7) are exactly the same as for the current EIS provided by ICL Mungret to burn 90,000 tons. How is this possible given the difference in quantities being incinerated ?
- The EIS provided by ICL Mungret is misleading. it mentions only one emission being higher when burning waste and states it is within EU limits. It fails to mention that when compared to current predicted concentrations, new emissions are being introduced which did not exist before. Thanium, Cadmium (carcinogen), mercury and arsenic to name a few. These may be within EU limits, but these limits are based on a healthy adult **not children or people with medical issues**.
- The EIS provided by ICL Mungret is incredibly difficult to assess with regard to emissions. They use different measurements in different tables making it very difficult to make comparisons to safe limits set down by Directive 2010/75/EU

4. Geological Impacts:

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- We would urge that ICL Mungret be subject to independent geological survey. firstly to assess if the site buildings and kilns have been affected by blasting. Many local residents will attest to their houses shaking when blasting occurs, they will also attest to cracks appearing in their walls.

- Has it been assessed how much raw material ICL Mungret has left to mine safely. It would appear that they have quarried to all boundaries within the current site. How much deeper can the site be quarried safely ?

5. Groundwater Contamination:

- ICL Mungret are looking to have the potassium trigger levels in groundwater increased to 25mg/l. This is 5 times the safe limits set down in the "EPA Ground water values interim report". This will affect wells, drinking water and ecology.

6. Hazardous Raw Material:

- 'Pulverised fly ash' is classed by the United States Environmental Protection Agency as a hazardous waste, containing concentrations of cancer causing heavy metals. ICL Mungret states in their application that it plans to use this as a raw material. They are building a store to house this ash. No information is shown whether this store is lined so as not to leech into groundwater. It is also not explained how it will be transferred into the process. If a conveyor belt is being used, is this conveyor belt enclosed? If not then there is a risk of the ash being whipped up by the wind making it a health hazard to employees and local residents and school children.

7. Tyre stores:

- Tyre Stores in ICL Mungret are out in the open

- Tyres attract mosquitos and vermin creating a health hazard and the potential for disease epidemic

- Tyres leech harmful contaminants into soil and ground water

8. Infrastructure:

- ICL will have to import tyres and other waste to fulfil their energy requirements creating a greater strain on the road infrastructure and also cancelling out any CO2 savings made from not burning fossil fuels.

9. Proximity to Healthcare Facilities:

- The World Health Organisation recommends a list of exclusionary criteria should be used in cases for siting new hazardous waste management facilities. Included on this list is "stationary populations such as those of hospitals and correctional institutions"

- There is University Hospital Limerick (**with new cystic fibrosis Unit**) and Dialysis Unit on the Dock rd both in close proximity to this proposed waste incineration facility.

- There is also children's respite care facility being built on the grounds of Mungret College.

- There is a planning permission for a private hospital (application no. 133) which is open until 26/06/2018. If a License is granted to ICL Mungret, surely this puts the current owner at a financial loss, no investor is going to build a private hospital next to a waste burning facility

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10. 2020 energy and climate targets:

- There has been no analysis of how much of ICL cement production is needed in Ireland and how much will be exported. Exceeding our 2020 energy and climate targets will attract fines. Importing cement does not raise our CO2 quota. Whereas exporting cement incurs penalties for the state rather than the company. This needs to be addressed.

11. Licence Length:

- 10 year licence is inappropriate. Any EIS cannot be guaranteed to remain relevant for ten years in the event of alternative technologies and new research becoming available.

12. Cumulative Impacts:

- The cumulative impacts of industry in the area has not been properly assessed. Particle emissions can travel up to 30 km therefore Aughinish alumina, the proposed gortnadroma gasification site and other industry cumulative impacts need to be thoroughly assessed which has not been done in EIS report provided by ICL Mungret

This type of industry is not safe, we all breathe the same air. The emissions from ICL Mungret will spread over 30 KM and will affect people and agriculture. I urge the decision makers to think carefully about what effect this will have on our health but especially the health of our children. The repercussions from this decision will only be felt in years to come, by then the damage will have been done

Signed

Residents Alliance for a Clean Environment

- A copy of the residents petition signed by over 400 people objecting to this proposal was too large to attach with this file online. This petition is ongoing at this time.

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
Rymphna Hek		
MARIA DILLON		
MARTIN FERGATA		
Sam Vlaher		
SHEILA MERRIN		
PATRICK HODD		
Jennifer Hk		
ANDREW PAGE		
ADRAIG MAHER		
PAULINE TWON		
Tom Twomey		
Ann Duffy		
Josephine V		
Fiona Buckley		
Joan Carty		
Michael C		
Annabelle		

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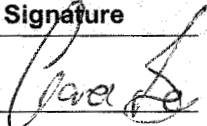
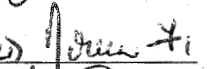

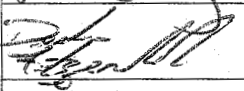

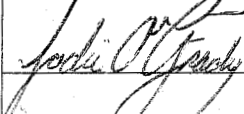
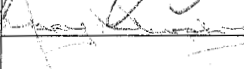
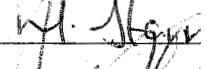

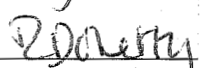

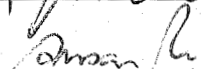
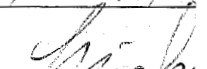
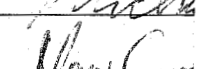
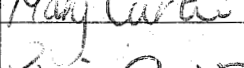
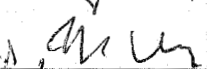

Printed Name	Signature
	B. O'Co
	L. O'Co
	Angel O.
	Brian O.
	Brian O.
	Carol O.
	Patrick O.
	S. O'Co
	Angela O.
	M. Ryan
HELEN MCGEE	Helen M. G.
	helen o'co
ANNE LONG	Anne L.
	Coombe
	Robert S.
HELEN O'CONNOR	Helen O.
EMMA O'SHEA	Emma O'S.

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Printed Name	Signature	Address
CIARA BEHAN		
NORMAN FITZGERALD		
MELISSA HINCHY		
	DELIA FITZGERALD	
Eileen O'Grady		
	Jackie O'Grady	
	Mary Moran	
DAVID JAMES		
Andy Hastings		
E Doherty		
DEAN SWEENEY		
DAN RYAN		
MICHAEL TULL		
Mary Carter		
	KEVIN GORMAN	
NICKA REAPER	GEORGINA	
Ann Creed		
B. Shivers		

Donal Dineen

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MARGARET HURLEY	<i>Margaret Hurley</i>	
OWEN WYNNE	<i>Owen Wynne</i>	
KEN MORAN	<i>Ken Moran</i>	
Kate Enright	<i>Kate Enright</i>	
Maria Connolly	<i>Maria Connolly</i>	
Peter Ryan	<i>Peter Ryan</i>	
MARGARET MCCORMACK	<i>Margaret McCormack</i>	
Seighin O'Callaghan	<i>Seighin O'Callaghan</i>	
Gina Barry	<i>Gina Barry</i>	
Bilish Butler	<i>Bilish Butler</i>	
Colin O'Leary	<i>Colin O'Leary</i>	
Douglas	<i>Douglas</i>	
MORAN	<i>MORAN</i>	
Hanley	<i>Hanley</i>	
Hanley	<i>Hanley</i>	
Doyle	<i>Doyle</i>	
MARIA MADIGAN	<i>Maria Madigan</i>	

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MARK CONNELL	Mark Connell
Tim Henahan	Tim Henahan
Eddie Selhorn	Eddie Selhorn
DENIS RUCSTON	Denis Rucston
Esther Mc Carthy	Esther Mc Carthy
Maeve Seery	Maeve Seery
STANIS SEERY	Stanis Seery
William Curran	William Curran
Liz Lenthorn	Liz Lenthorn
Sean Donoghue	Sean Donoghue
J. O'Connell	J. O'Connell
	Deirdre May
GP Ryan	GP Ryan
H. Reilly	H. Reilly
Declan Lave	Declan Lave
Valery	Valery
Paul Wright	Paul Wright

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
SEAN COSTELLO	<i>Seán Costello</i>	
BERNADETTE COSTELLO	<i>Bernadette Costello</i>	
Rosario Costello	<i>Rosario Costello</i>	
Daniel Wallace	<i>Dan Wallace</i>	
Dennis McNamee	<i>Dennis McNamee</i>	
PEGGY NAELE	<i>Peggy Naele</i>	
Chris Ryan	<i>Chris Ryan</i>	
DEREK O'DWYER	<i>Derek O'Dwyer</i>	
LARRY FENNER	<i>Larry Fenner</i>	
Donal M. McNamee	<i>Donal M. McNamee</i>	
MADELYN PORTLEY	<i>Madelyn Portley</i>	
Bill Mullen	<i>Bill Mullen</i>	
Rae Keener	<i>Rae Keener</i>	
Theresa Begley	<i>Theresa Begley</i>	
CAROL McCarroll	<i>Carol McCarroll</i>	
Peter PERIL	<i>Peter Peril</i>	
H.C. RORAN	<i>H.C. Roran</i>	
PAUL BLAKE	<i>Paul Blake</i>	

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
CECILY LAWLER	Cecily Lawler	
KEVIN WILKINSON	Kevin Wilk	
MARY WILKINSON	Mary Wilkinso	
John O'Donoghue	John O'Don	
Mary Kelly	Mary Kelly	
Anne Gebelt	Anne Ge	
CHRIS HARTY	Chris Hart	
Nickie DRAGONE	Nickie Dr	
EMMA BOWLES	Emma Bow	
Jan Mc	Jan Mc	
Mary	Mary	
Jim	Jim	
Matthew Wilson	Matthew W	
JOHN A CONN	John A Con	
DAVID SCORER	David Sc	
DONAL O'CONNOR	Donal O'Con	
FINOLA O'CONNOR	Finola O'	
Mary	Mary	

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
CATHY KEENE	Cathy	
Carol Keene	Carol	
Wanda McGee	Wanda	
Carmel Healy	Carmel	
Teresa Moloney	Teresa	
Joe Satter	Joe	
COBYRNE	Colby	
NICHOLAS GRIFFIN	Nick	
Alma O'Brien	Alma	
ITA LYONS	Ita	
Jed	Jed	
Catherine Collop	Catherine	
Carmel Hume	Carmel	
MRS		
DECLAN BACHE	Declan	
CIAN O'BRIEN	Cian	
Kathleen	Kathleen	
John Breen	John	

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
	<i>M. Murphy</i>	
M. Murphy		
I. Larkin	<i>I. Larkin</i>	
<i>Servy Ryan</i>	<i>Servy Ryan</i>	
<i>Kenny Ryan</i>	<i>Kenny Ryan</i>	
JOHN RYAN	<i>John Ryan</i>	
Gerry O'Neill	<i>Gerry O'Neill</i>	
J Lee	<i>J Lee</i>	
Kieran Thompson	<i>Kieran Thompson</i>	
Peadar McGARRIN	<i>Peadar McGARRIN</i>	
Chris Crowley	<i>Chris Crowley</i>	
ANNE WHELAN	<i>Anne W</i>	
<i>Ray Hyatt</i>	<i>Ray Hyatt</i>	
D. Cullen	<i>D. Cullen</i>	
Catharina Conlon	<i>Catharina Conlon</i>	
Ann Reedy	<i>Ann Reedy</i>	
Tara O'Sullivan	<i>Tara O'Sullivan</i>	
Susan Connolly		

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(11)

Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application



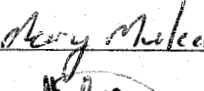

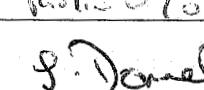
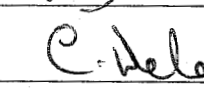
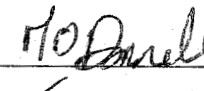
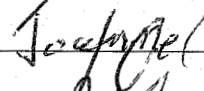

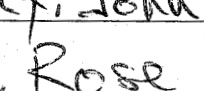
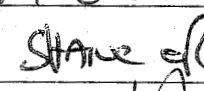


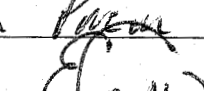

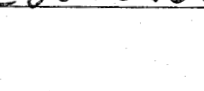

Printed Name	Signature	Address
CATHERINE FINNIGAN	<i>Catherine Finnigan</i>	
KATE KIRBY	<i>Kate Kirby</i>	
JOHN WILLOMNEY	<i>John Willooney</i>	
Tom Condon	<i>Tom Condon</i>	
May Vanyu	<i>May Vanyu</i>	
BO DUCHESNE	<i>BO DUCHESNE</i>	
JOHN HOLLAND	<i>JOHN HOLLAND</i>	
Jean K	<i>JEAN K</i>	
William S. S. S.	<i>W. S. S.</i>	
JEAN LAHILL	<i>JEAN LAHILL</i>	
P. O'Brien	<i>P. O'Brien</i>	
O. Traynor	<i>O. Traynor</i>	
KATHLEEN GALLAGHER	<i>K. Gallagher</i>	
JOHN WONEY	<i>JOHN WONEY</i>	
Catherine Sciasca	<i>Catherine Sciasca</i>	
Donna Mulvihill	<i>Donna Mulvihill</i>	
TOM DEE	<i>TOM DEE</i>	
Susan Dunne	<i>Susan Dunne</i>	

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
MIKE LONG		0. 0
DEREK MULCAHY		
Mary Mulcahy		
M. O'Donnell		
PAULINE O'CONNELL		
TRACY DONNELLY		
Catherine Delaney		
Michelle Donnell		
J. C. WELLS		
JOHN LOONEY		
ROSE LOONEY		
Shane O'Leary		
TERESA NEVILLE		
PAULINE MCG		
Pauline MCG		
Eleanor Frank		
Clementine		

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
EITHNE	Eithne	
LORRAINE MCGOWAN	Loraine	
MARIE O REILLY	Marie O	
JOHN HOGAN	John	
B. Lento	B. Lento	
N. Murphy	N. Murphy	
J. Hayes	J. Hayes	
Bridget	Bridget	
SEAN HARNETT	SEAN HARNETT	
Thomas	Thomas	
ONE	ONE	
ANNE	ANNE	
CROWIN	CROWIN	
SUZANNE Kennedy	SUZANNE Kennedy	
May Crean	May Crean	
L. Murphy	L. Murphy	
Doug Murphy	Doug Murphy	

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
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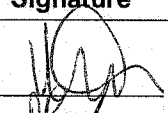
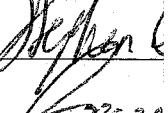
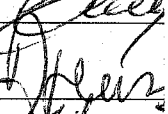
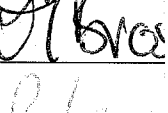
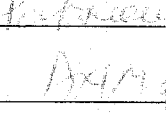

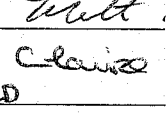
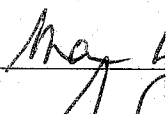
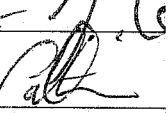
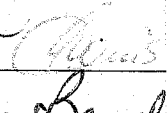
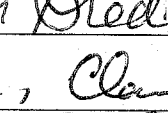
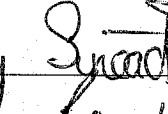



Printed Name	Signature	Address
Marianne Boney	MARIANNE	
Una Newman	Una	
Patricia Keenan	Pete	
Mary O'Leary	Mary	
Justin Bohen	Jul	
J Browne	J Bro	
Sinead M	Sinead	
Tom Quinn	Thomas	
Cleaner Corbett	Clear	
SEAMUS FLAVIN	Seamus	
Paula Srian	Paula	
NICOLA O'DWYER	Nicola	
John Reynolds	John	
Bridget Ryan	Bridget	
Nancy Lellan	Nancy	
A. Smith	A. Smith	
A. HARTY	A. Harty	
P. White	P. White	

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
VALERIE COONE		
Stephen Cunniff		
CECILY LAWLER		
Deirdre Hussey		
VALERIE BROWNAN		
PATRICIA KELLY		
Grainne Lee		
Kate White		
MATT MICHAEL		
CLAIRE FITZGERALD		
Hanna Lenny		
JACINTA CORNEILL		
Catherine Coad		
Ann Ryan		
Breda Duggan		
Claire Wilkin		
Sinead Doherty		
B Walsh		

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
ANNE	Anne	
SCAIVLAIN		
PAIRICK	Patrick	
of Gray	Patrick	
Elaine O	Elaine	
GRAY		
Dendre O	Dendre O	
Reilly		
Colin O'Flynn	Colin	
Brid Nix	Brid	
Quinn	Quinn	
Kellie O'Connell	Kellie	
Finlay	Finlay	
Finlay	Finlay	
ANTHONY HEALING	Anthony	
D. M. H.	D. M. H.	
EDDIE	Eddie	
Halliday		
Aurora Leach	Aurora	
Patsy Enright	Patsy	
Conor McConarty	Conor	
Damian O'Shaughnessy	Damian	

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
P. McDERMOTT	Ph.Dermott	
J. SHAW	Shaw	
Maureen Burke	Maureen	
Patricia Lynch	Ca	
S. O'Brien	S. O'Brien	
Linda Cliffe	Linda	
Nancy	Bear	
Gerard	Gerard	
MAOZONNELL	MAOZONNELL	
Anne M. Donagan	Anne M. Donagan	
Eoin DEERON	Eoin DEERON	
H. McDonald	H. McDonald	
D. O'Donoghue	D. O'Donoghue	
NATALIE O'NEALS	NATALIE O'NEALS	
	LIAM	
ALBERT LAWSON	ALBERT	
Catherine Ryan	Catherine	
Brenda Rice	Brenda	

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
KAREN O'Rourke	[Signature]	
Emma Ceain	[Signature]	
Kaylah Ceain	[Signature]	
Elissa Ceain	[Signature]	
[Signature]	[Signature]	
FIONA WITT	[Signature]	
LINDA BURKE	[Signature]	
N O'Donoghue	[Signature]	
L O'Donoghue	[Signature]	
Sichan Hartley	[Signature]	
Jim Hartley	[Signature]	
Mar Moore	MARGARET O	
E. Long	E. Long	
M. Long	M. Long	
Joe O'Riordan	Joe O'Riordan	
Moore O'Riordan	Moore O'Riordan	
Manan O'Riordan	Manan O'Riordan	
Pat O'Riordan	Clarena	

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Petition Against Burning Alternative Fuels in Irish Cement, Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose this application

Printed Name	Signature	Address
MARY CASEY	Mary Casey	
P. WALSH	P. Walsh	
KATHLEEN DONNAN	Kathleen	
N. ANN CUSACK	N. Ann Cusack	
CASSIA RYAN	C. Ryan	
Catherine Barry	Catherine Barry	
Eveline Hanna	Eveline Hanna	
Deirdre O'Connell	Deirdre O'Connell	
ANNE ANDREWS	Anne Andrews	
Mary Murphy	Mary Murphy	
Margaret O'Donoghue	Margaret O'Donoghue	
Medhoo Khan	Medhoo Khan	
Dorothy O'Connell	Dorothy O'Connell	
Liam Fitzgerald	Liam Fitzgerald	
Ruth Furlong	Ruth Furlong	
Sharon Mann	Sharon Mann	
T. Gavin Murphy	T. Gavin Murphy	

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Petition Against Burning Alternative Fuels in Irish Cen Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose it application

Printed Name	Signature	Address
--------------	-----------	---------

May		
Forl Wyse		
Marie		
Mr. R. R.		
Edice		
Don		
Carole Ann		
Don Alder		
Wray Walker		
Michael Geary		
Sean Geary		
Goran Geary		
Cathal Geary		
Colin Geary		
Joseph Hayes		
Frank O'Leary		
OSDMMO		

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Petition Against Burning Alternative Fuels in Irish Cement Mungret.

Petition summary and background	To prevent Irish Cement burning Hazardous Waste in their Mungret facility
Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose the application

Printed Name	Signature	Address
B. Colton		
A. Hennessy		
K. Sexton		
H. Moore		
J. McGeath		
R. Gordon		
S. O'Leary		
MARIE ROOPE		
Justin M. Sweeney		
Basilio Costa		
ANNE WHELAN		
Donna Quinn		
Catherine Ryan		
Ambrose Holland		
MURIEL PURCELL		
Georgina Sweeney		
P. Sheehan		
C. Kelly		

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Petition Against Burning Alternative Fuels in Irish Cement Mungret.

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Action petitioned for	We, the undersigned, Urge Limerick City and County Council and EPA to oppose the application

Printed Name	Signature	Address
KEVIN BARRY		
M. Larkin		
H. Conna		
LAURA STARR		
Deborah Call		
Stacey Nash		
N. McNamara		
Tara Walsh		
Kay Hanley		
John Ryan		
Fiona Regan		
John Regan		
S. Wahl		
Liz Lohan		

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From:
Sent: 12 July 2016 23:34
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

● **Objection 1**

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

Due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves.

● **Objection 4**

The kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Objection 6

I'm concerned that the storage of 1,000's of tonnes of tyres represents a fire risk not to mention the risk of contamination of the Gouldavoher aquifer as a consequence of any fire.

Objection 7

I'm concerned that the storage of 1,000's of tonnes of bio-solids and industrial solvents risks leaching of contaminant into the Gouldavoher aquifer, polluting the ground-water and the Shannon Estuary.

Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

Objection 9

I'm concerned by the possibility of noxious odours from the storage and incineration of solvents, sludge and industrial solvents especially in light of the EPA's inability to measure and monitor these risks.

Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Dee Oconnor

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From:
Sent: 12 July 2016 21:33
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Objection 2

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Objection 3

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Objection 4

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jimmy hasty

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From:
Sent: 12 July 2016 14:03
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

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Sylwia borodziuk

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From:
Sent: 12 July 2016 09:28
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Ilze Santare

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From:
Sent: 12 July 2016 09:23
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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owen wyne

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Sent: 12 July 2016 08:03
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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marta janicka

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**ENVIRONMENTAL LICENSING
PROGRAMME, OES**

**Submission No 1055 was
withdrawn on
16th January 2017**

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Any queries on this matter can be directed to:

Environmental Licensing Programme
Office of Environmental Sustainability,
PO Box 3000,
Johnstown Castle Estate,
County Wexford
Tel: Locall 1890 33 55 99 or 053 91 60600;
Fax: 053 91 60699.
Email: licensing@epa.ie

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Norbert Eged

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From:
Sent: 12 July 2016 00:26
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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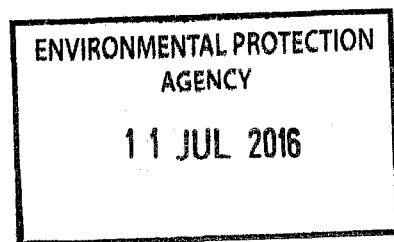
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SABBIH KHAN

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Subm No: 1052

LAP – Limerick Against Pollution

Date: 20/06/2016

To:

The Environmental Protection Agency (online Submission)

Reference number:	P0029-05
Applicant:	Irish Cement Limerick Ltd
Address:	Castlemungret, Mungret, Co. Limerick

Dear Sir/Madam,

Please find below an outline of our objection to the incineration of tyres and alternative fuels at the Irish Cement factory in Castlemungret, Co. Limerick. Irish Cement Limerick has been a good employer since the 1930's in Limerick. We would prefer Irish Cement Limited to continue to employ in the locality; this employment however must not be to the detriment of the public's health and well-being.

This EIS has several omissions, discrepancies and contradictions which need to be highlighted, investigated and documented. This objection to the granting of an EPA licence is based on several areas of concern for the community which are broken down into several sections:

1. Health Risk Assessment
2. Suitability of the Site
3. Lack of consideration for surrounding community
4. Obsolete software used to perform calculations
5. Dust Deposition monitoring
6. Sampling
7. Traffic Considerations
8. Volumes and ratios of proposed alternative fuels
9. Storage of materials
10. Employment calculations

1) Health Risk Assessment

There is no health risk assessment in the EIS. Irish Cement claim there is no change from the current licence in terms of emissions, this is not true. Bio-accumulations and future risks caused by this change in fuel have not been considered (heavy metals, dioxins and furans) as per predicted air emissions. The health risk assessment needs to cater for the most vulnerable (worst case scenario) i.e. the old, the young and the unborn. Natural gas is available to the Irish Cement site. Has this been considered as a fuel source?

All incinerators produce carcinogenic dioxins, especially when plastics are burned, and create ultra-fine particles that can cause serious respiratory and heart problems. Dioxins accumulate in the food chain and are ingested by humans. Modern municipal incinerators attempt to minimise these risks with control systems, fail-safe mechanisms, sophisticated filtration and specialist staff. But even they can't eliminate the risks. So how will a 30 year-old cement kiln in a 70 year-old factory with no specialist staff do it?

It is imperative a specialist epidemiologist conducts a health risk assessment to be included in the submitted EIS. This should take into account the impact of the last 75 years as well as the proposed 10 year future licence. The health risk assessment also needs to consider soil / food chain and identify historical impact and future risks. The facility is surrounded by fields, looking at the EPA website there was no food test done on dioxins and furans in and around Limerick city or even County. As per Irish Cement 2015 booklet, they are proud owners of 150 head of cattle, even though this farm land is concentrated upwind from the plant it is important that dioxin levels are independently assessed as part of this EIS. Complaints have been raised from farmers in Ballykeefe area (downwind) calcium unbalancing in cattle. This matter should be investigated further to ensure future produce will not be adversely affected.

In: Swiss guideline, Disposal of waste in Cement Plants, Page 4:3.1 – b)

"Municipal waste and specifically sorted municipal waste fractions (e.g. RDF, "refuse derived fuel"), as well as other waste comparable to municipal waste with respect to its origin, material properties, chemical and physical behaviour and chemical composition, shall not be disposed of in cement plants if it is not included in the Positive list (Appendix I) (the Positive list contains, for example, used paper and cardboard)."

This is in contraction to: "Irish Cement Limerick, Investing in our future" booklet 2015 attached to planning application that states:

"FINE SOLIDS e.g. chipped timber, shredded plastics, shredded textiles, tyre fluff, SRF - These fine materials (typically sized 10-50mm) will be delivered to site, ready to use and offloaded from trucks into enclosed storage bays or halls from where they will be pneumatically conveyed to the kiln system. This system will be similar to the existing SRF handling and feeding system in Plantin."

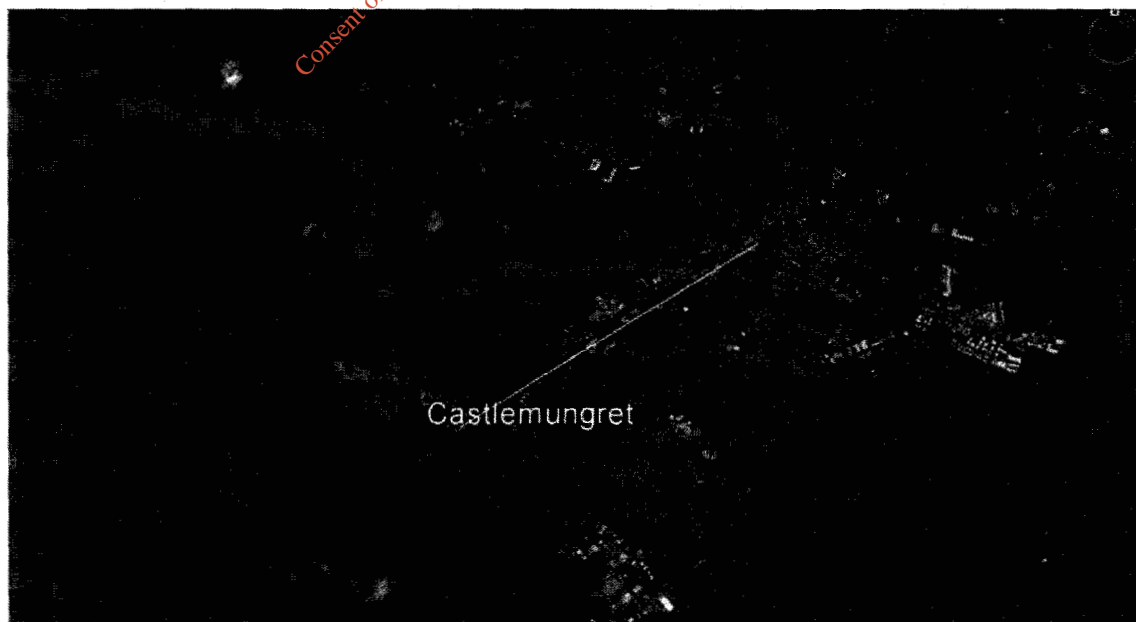
2) Suitability of the site

"2.2.6 Neighbouring developments: The site is bounded on the south by the N69 road. Castlemungret Village lies close to the southern boundary of the site, and additional intermittent residential development is located to the southwest of the site. To the east and southeast of the site, lie the residential areas of Dooradoyle and Gouldavoher. The closest dwelling location is approximately 30m from the site boundary."

Due to urban sprawl, the location is not suitable for this type of facility; the Cement Factory is located 5 km from Limerick's city centre (Fig 2.1). The boundary called out in the EIS is incorrect, it should relate to Figure B.1 (Fig 2.2). It has been offset inwards to give the impression that it is further than it actually is (Fig 2.2). The correct offset would cover the residential areas of Sli na Manach, Ard Aulin and Mungret village. The company offset their boundary 500 meters from their plant, but did not include the whole site such as quarry and fuel storage i.e. diesel (diesel oil tank number 9). The map called out in the EIS is out of date and does not have the latest housing estates on it i.e. Ard Aulin (Fig 2.3)

"Environmental Impact Statement, 4 Human Beings"... "Application Site and surrounding Landuses & Residential Properties (annotated Extract from Map 1A Southern Environs Local Area Plan 2011-2017)"

Fig 2.1



3) ~~Lack of consideration for the surrounding community~~

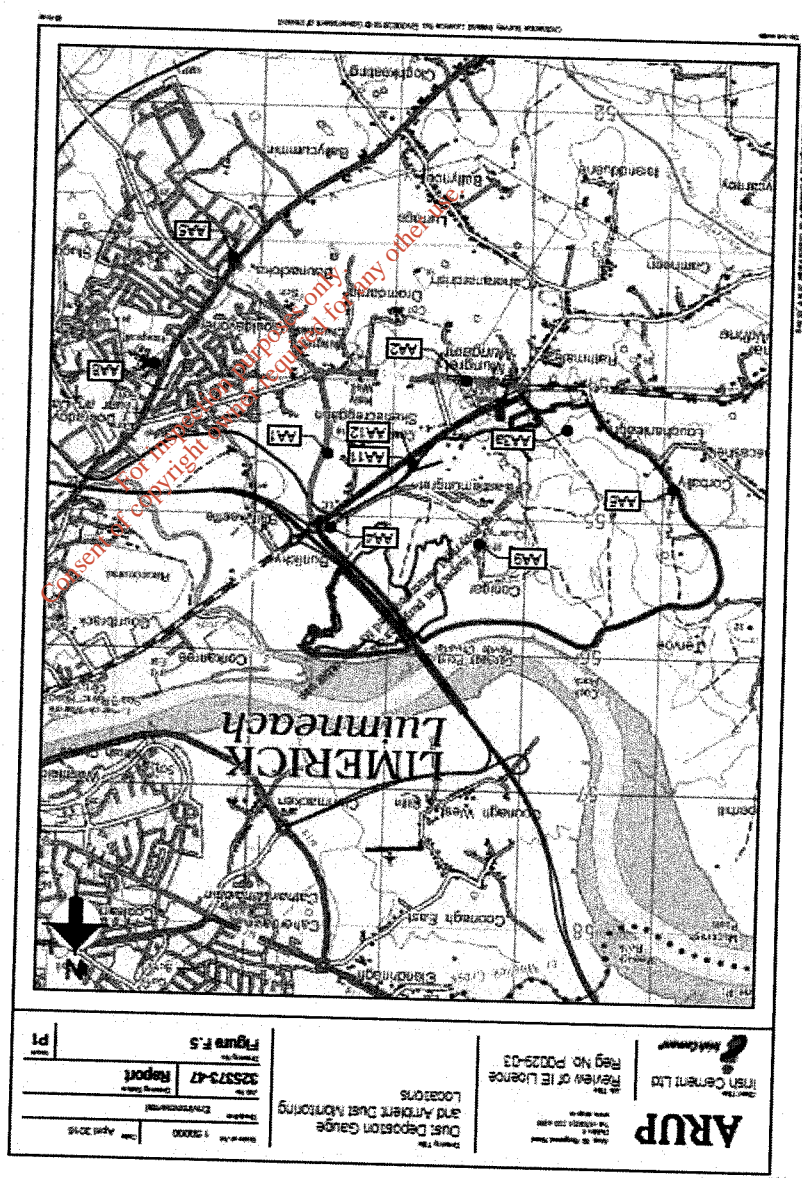


Fig 2.3

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Plume Plotter

Fig 4.1

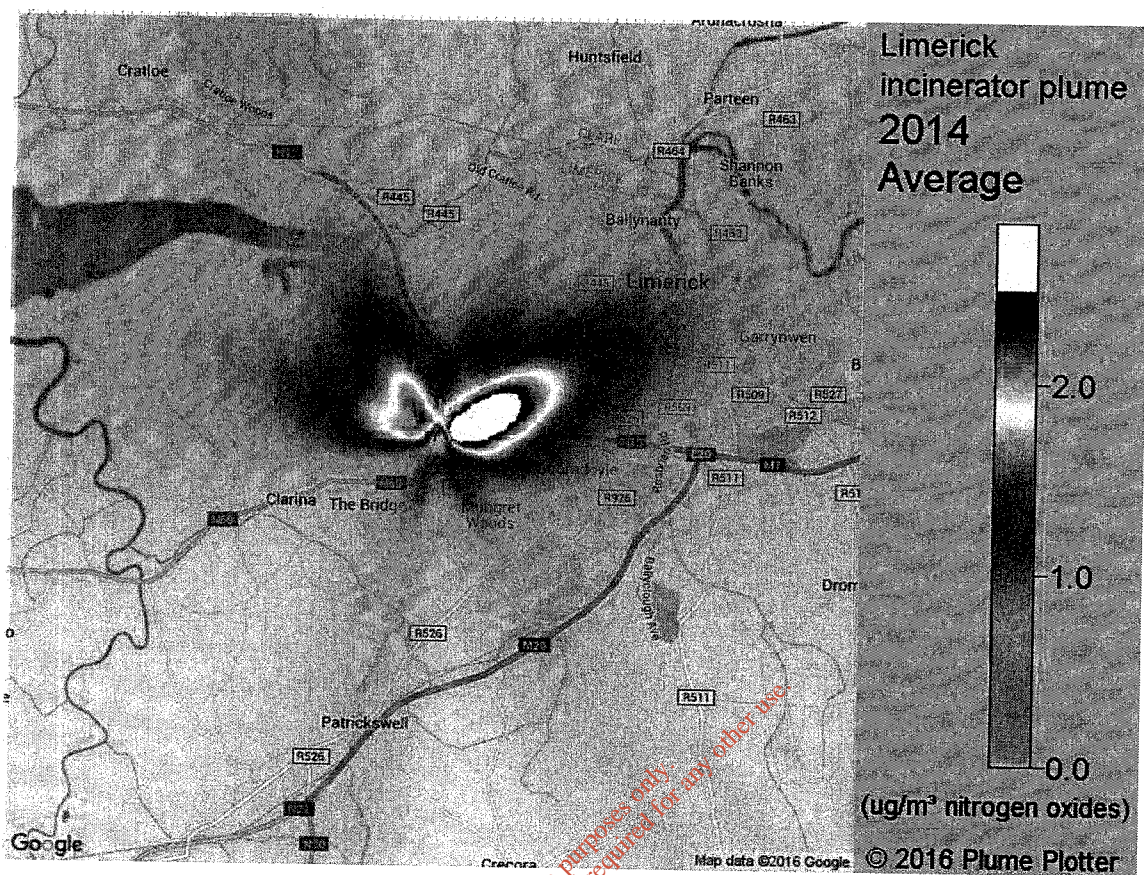
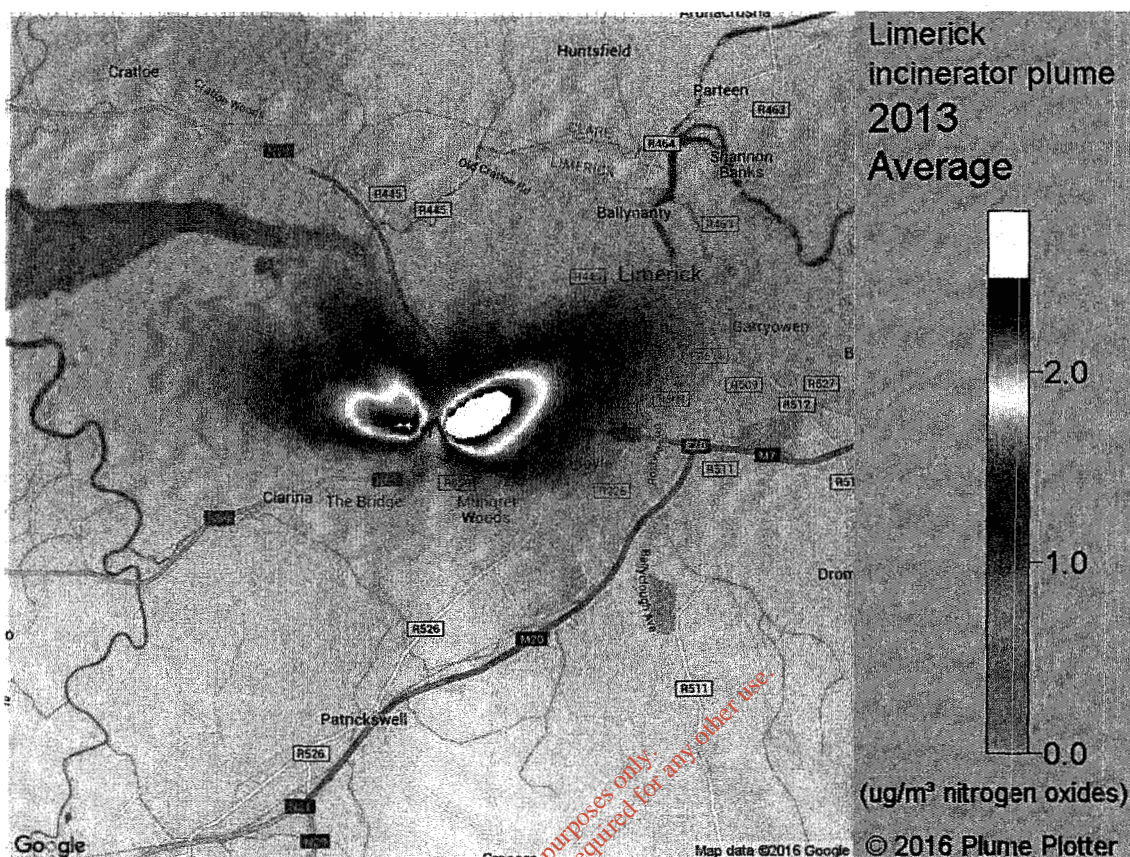


Fig 4.2



5) Dust Deposition monitoring

The public need to have confidence that there is no risk to their health. As mentioned in the EIS *"Incidents"* happen. The EIS states that ***"Dust monitoring stations are not maintained, therefore readings are inaccurate: (ref. EIS –Attachment No. E, E - 5 of 37, Table E.3 Dust deposition monitoring results for 2015)"***

The data in table below (Fig 5.1) needs to be investigated fully. The fact that the data is not impartial is of huge concern. I find it inconvenient that the results of every non-compliance listed on the table have been deemed as tainted by external contamination. This is completely unacceptable. Furthermore, the data from AA12 is not included.

The EIS states ***"in general, results are in compliance"***. This is incorrect; the results are tainted and non-compliant. This data needs to be independently accessed. This is not an acceptable standard of dust deposition monitoring. Non-compliance needs to be investigated and sanctions need to be enforced by the EPA.

Fig 5.1

Table E.3: Dust deposition monitoring results for 2015

	Quarter 1 dust deposition rate (mg/m ² /day)	Quarter 2 dust deposition rate (mg/m ² /day)	Quarter 3 dust deposition rate (mg/m ² /day)	Quarter 4 dust deposition rate (mg/m ² /day)
AA1	129.8	71.7	274.7****	86
AA2	160.4	82.9	226****	179.3
AA3	Vandalised			
AA4	671.9*	217.6	147.6****	282***
AA5	129.8	213	137.2	211.7***
AA6	169.8	222	119.2	240.2***
AA8	153.5	305.6***	153.1	282.1***
AA9	479.8**	202.7	323.8****	241.5***
AA11	Only measured when AA12 not operating			

* contaminated with bird droppings

** contaminated with algae

*** contaminated with leaves etc.

**** insect contamination

In general, results are in compliance with the dust deposition limit of 240mg/m²/day. Significant issues have been encountered in ensuring representative, undisturbed and uncontaminated samples. Elevated levels can be explained by the effects of sample contamination.

The dust deposition monitoring gauge, AA3, is located in the sportsfield on the southern boundary of the site, refer to Figure F.5. This monitoring point is regularly vandalised and no results could be obtained at this location in 2014 and 2015. ICL proposes to discontinue this monitoring point and relocate the monitoring equipment to a less vulnerable location, refer to Figure F.5 for proposed new location (AA3a).

Continuous ambient particulate monitoring is carried out at AA12. This is located adjacent to dust deposition gauge AA11, which will be used in the event of a fault with the continuous ambient monitor.

6) Sampling

EIS states *"The excavation of the quarry at the Limerick Works has provided a further low point in the area and the deepening of the Quarry Sump over the years has caused a change in the local groundwater flow pattern. Now, with the Quarry Sump located at approximately -26m (below Ordnance Datum), groundwater which would have flowed directly to the Shannon Estuary is instead drawn towards the Quarry Sump from where it is pumped to Bunlicky Clayfield Pond and eventually overflows to the Shannon Estuary."*

If the Castlemungret IP Licence Review, Closure, Restoration and Aftercare Management Plan is superimposed over the *"Groundwater Contour Mapping"* and *"Ground Investigation Locations – December 2015"*, you can see that the quarry has reached groundwater.

Runoff tank capacity, condition & maintenance info is needed to make sure that any surplus water flow both during construction and normal operations does not end up in the quarry thus affecting water quality of the aquifer, residential drinking water & the river Shannon.

Soil investigation TP104 and TP101 are within the groundwater catchment area. More Investigation should be required to determine the extent of contamination of chromium and asbestos.

"addendum D – 19":

"Industry practice around Europe related to sampling, analysis and evaluation of incoming fuels is based on characterising the fuel and raw materials over time. Testing of a composite sample is carried out to confirm that the deliveries are in compliance with the expected specification. Testing frequency is likely to be greater during initial evaluations and decline as compliance confidence increases."

The EIS claims that Irish Cement Limited Limerick are compliant with the Swiss Model. The Swiss model itself in ***"Addenda A.1, Appendix II, page 2/7 Status: May 2007"*** dictates: ***"The quality of the individual CSS deliveries to the cement plants must be documented in an appropriate form and samples retained to enable the annual loads to be subsequently checked on the basis of the documents and (if necessary) further analysis. The average monthly values of the individual pollutant loads must be checked periodically, at least once every six months by the competent cantonal authorities."***

We respectfully request that the EPA investigate further.

7) Traffic Considerations

90,000 tonnes of tyres per annum equates to 1,000,000 tyres per month – see the calculation below. Currently there are 40,000 tonnes of tyres used in the republic of Ireland per annum. If Irish Cement Limited is to reach their 90,000 tonnes (or is that 210,000 tonnes?) of tyres per annum, where is the deficit going to be sourced from?

Have the costs to the state regarding CO2 and NOx releases due to transportation been taken into account? This is not contemplated in this EIS. We would like to point out that an objection to the Limerick County Council was made by a company that recycles tyres. We strongly believe that incineration is against a Circular Economy in reducing waste. Recycling does not equate to incineration.

Cemex website stated that the average used tyre weight is 6.5kg (this was confirmed at a local mechanics also), so dividing 90,000,000 kilos by 6.5 gives us 13,846,154 tyre per annum. Dividing that by 12 is 1,153,846 per month, or dividing by 365 gives us a daily figure of 37, 935 tyres.

Upon researching a technical discussion on the efficient loading of tyres in covered (closed) trucks, and read about the 'weave' method of stacking, which works out at just under 1200 tyres per load, so dividing 37,935 tyres per day by 1200 tyres per load gives us over 31 truck loads - that's just for the 90,000 tonne figure. Obviously we don't have the ratio of how many tyres versus plastic etc that they intend to use. The stacking method and number of trucks required need to be confirmed. The figures Irish Cement Limited are quoting don't stack up (no pun intended). The volume of a tyre is mostly air, logic would dictate that this will lead to a dramatic increase in traffic. To summarise, the transportation of tyres and other alternative material will dramatically exceed the current traffic patterns entering the site. Yet we are still not able to correctly predict this due to the lack of information and ratios. More to come on this below...

12.2.7 Existing Fuel Use and Associated Traffic Patterns

Imported Petroleum Coke (petcoke), a fossil fuel, is currently the primary fuel in use in Limerick.

Until recently, the Factory was running below maximum output capacity and in 2015 used circa 70,000 tonnes of petcoke. However, cement output is increasing through 2016 and if the Factory were to run at full capacity it is expected that c. 130,000 tonnes of petcoke would be required.

Brady Shipman Martin

12-3

EPA Export 19-05-201

Irish Cement Limited: Use of Alternative Fuels and Alternative Raw Materials

Environmental Impact Statement

Petcoke or coal is stored in a defined stockpile area located on site. At present petcoke/coal is delivered by ship to Foynes Port and from there is delivered by truck via the N69 to the existing on-site storage area in the Cement Factory. Deliveries to meet current demand (based on 2015 figures of c.70,000t) are made in batches of 30,000t to 40,000t over short timeframes (c. 8 to 10 weeks). The storage area at Limerick has capacity for c. 40,000 tonnes of petcoke and as such, deliveries to meet current demand are made c. 2 times per annum (i.e. up to 20 weeks of petcoke deliveries).

If the Cement Factory was to run at maximum output capacity, the requirement for short timeframe deliveries of petcoke to meet additional fuel demand (c.130,000t) will increase to c. 4 times per year (i.e. up to 40 weeks of petcoke deliveries).

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The current daily peak traffic generated by petcoke deliveries would stay as is, even if the plant increases capacity to maximum output. While the volume of petcoke required would increase to operate at maximum output, these deliveries would continue to occur as per the existing arrangement over 8 to 10 week periods a number of times a year to coincide with the deliveries at Foynes Port. Therefore, the daily peak petcoke deliveries would not increase but rather delivery periods will be sustained for more weeks of the year than currently due to the larger volumes of petcoke required to operate at maximum capacity i.e. 20 weeks of deliveries currently versus 40 weeks of deliveries at maximum output.

Therefore, as both the 2015 existing and maximum output peak traffic volumes are the same, only the maximum output traffic volumes are presented in the following sections when comparing against the traffic volumes generated by the proposed development.

Table 12.2 summarises the existing maximum output daily trip generation associated with petcoke deliveries. The numbers are based on the peak delivery activity outlined above.

Table 12.2: Existing (2015) Two-Way Maximum Output Daily and Peak Hour Trip Generation (vehicles)

	Daily	Peak Hour
LGV	12	4
HGV	34	6
Total	46	10

8) Volumes and ratios of proposed alternative fuels

The proposed volume of tyres to be incinerated in the planning permission application is 90,000 tonnes. The EIS contradicts this and specifies 210,000 tonnes. One of these figures is incorrect, it needs to be clarified and revised.

The ratios of proposed alternative fuels have not been specified in the EIS. This is an omission. How can the output or impact of an incinerator be characterised if the inputs are not defined?

"Page D -17 of 20..."

In the environmental impact statement it makes reference to ***"The maximum amount of waste that will be held or stored at the installation at any one time is set out in table D.2.2.."***

More clarification is needed on the list of hazardous waste materials in:

"List of hazardous substances considered as an extract from Tables G I and II of the IED licence application, Page C3-5" has less 4 Dangerous materials than LOW Hazardous wastes in "Review Attachment No. D, Page D13 to 16"

As per Swiss guideline, Disposal of waste in Cement Plants, Page 11:

"Cement plants may accept (permissible) special waste and other waste subject to control only from the following consignors: (1) Industrial works in which the waste originates, and only if it arises directly from a defined process and in large quantities. Producers of special

waste and other waste subject to control may mix large batches provided each batch alone complies with the guidance values, and an explicit LMW code applies to the resulting mixture

(e.g. codes 14 06 02 or 13 02 08). In all other cases, mixing is prohibited (Art. 5 OMW and Art. 10 TOW).

(2) Companies that accept special waste and other waste subject to control for treatment and have the necessary cantonal licence. In producing large batches for delivery to the cement plants, such companies may intermix special waste only if each individual batch satisfies the relevant criteria for pollutant content (prohibition of mixing, Art. 5 OMW and Art. 10 TOW)."

In the EIS there is no mention where these fuels will be sourced and if adequate licences are in place with the volumes needed for cement/clinker production.

As per Swiss guideline, Disposal of waste in Cement Plants, Page 9

"d. Emission of organic compounds. Cement plants that dispose of waste must measure the emissions of organic substances from the cement kiln, temporary storage (if present) and feeding systems at regular intervals. The quantity or quality of organic compound emissions can alter significantly when waste is combusted inappropriately in the secondary firing (i.e. incomplete combustion). This is also the case when organic compounds are emitted upon heating of waste added to the raw meal on heating. If necessary, the emission of organic compounds must be reduced by technical means."

Correct assessment of proposed building and process sustainability due to quantities required for clinker/cement production. The quarrying strategy needs to be investigated. Are there still suitable locations onsite to excavate limestone? How will this excavation effect the stability of the surrounding buildings?

As per Swiss guideline, Disposal of waste in Cement Plants, Page 9

**"5. Further requirements, 5.1 Operation, monitoring and transport
Mixing of waste, Mixing of (permitted) waste is allowed only if the pollutant content of each individual batch complies with the guidance values stipulated in the Guidelines (cf. in addition art. 10 TOW10, and for special waste, art. 5 OMW11). However, the special provisions for CSS in Appendix II are excepted and may deviate from this."**

Irish Cement Limited needs to provide more information as to what mixes will be used and what the pollution content will be due to this industry.

As per Swiss guideline, Disposal of waste in Cement Plants, Page 13:

"SAEFL will periodically review the positive list to establish whether certain types of waste should be removed or if new types should be added. To this end, SAEFL appoints an expert group comprising representatives of the cantons, the cement industry and the waste processing industry. The expert group convenes at regular intervals, at least once a year. The expert group can also suggest to SAEFL any changes in the Guidelines that it deems

necessary.” Bare in mind that this document is dated 2007 and no new review has been added to this document. Its is very concerning.

In: Appendix II, page 2/7, Status May 2007

“b) Quality control

Quality controls must ensure, first, that the annual pollutant loads in the alternative fuels produced do not exceed the values given in Table A II/1 and, second, that the cement plant complies with the specified exhaust values and the guidance values for clinker. The quality of the individual CSS deliveries to the cement plants must be documented in an appropriate form and samples retained to enable the annual loads to be subsequently checked on the basis of the documents and (if necessary) further analysis. The average monthly values of the individual pollutant loads must be checked periodically, at least once every six months, by the competent cantonal authorities. “

Tight quality control as per the Swiss model must be adhered to in any incineration process. This is the absolute minimum. It would also go a long way to increase confidence levels with the general public

9) Storage of materials

Please refer to **“Review Attachment No. D,”**

“Page D -17 of 20...”

In the environmental impact statement it makes reference to **“The maximum amount of waste that will be held or stored at the installation at any one time is set out in table D.2.2..”**

This information is missing from the EIS!

It very important due to the LOW code description of some of the substances that could change Air Emission such as **“halogenated solvents, acid tars, soil remediation containing hazardous substances, etc..” (D – 13 to D16 of Review attachment No. D)**

The two sections quoted below from the EIS contradict each other:

“Environmental impact statement, Page ix”

“All construction activities will be carried out within the catchment area of the site drainage system. All surface water from the site passes through settling tanks and interceptors prior to discharge into Bunlicky. The interceptors have been installed and maintained in compliance with the Industrial Emissions license requirements.” And “site conceptual model”

“Environmental impact statement, page x”

"An air dispersion modelling assessment was carried out to determine the effect of revised emissions from the main sources on site. Emissions from existing sources will be reduced due to the requirement for ICL to comply with new licensing requirements. No new sources are proposed as part of the development."

But in Drawing: ***"Main and Minor Emissions to Atmosphere, Figure E., Attachment D"***

There are 3 minor emitters to be introduced with this new License Submission. Air, noise, dust and surface water monitoring takes place currently in accordance with the conditions of the IE Licence. These results are reported annually in the Annual Environmental Report.

in: Castlemungret IPC licence Review Closure, restoration and aftercare
Management Plan, Page 9

10) Employment calculations

Irish Cement Limited claim indirect employment opportunity will be generated from this application, yet no basis for the 700 job creations are described in this EIS, no data or breakdown of how this figure was calculated. There is no reference to what jobs will be lost due to this application in sectors such as: up cycling, recycling and research and development of new technologies to deal with human and industry waste in a proactive manner i.e. de-vulcanisation, solvent recovery. Irish Cement Limited needs to back this statement up with hard facts.

Thank you for taking the time to read this submission. Please consider the psychological distress this proposal has caused for the local residents over the last few months when making your decision. Irish Cement Limited's refusal to have a transparent public meeting to discuss these issues has only exacerbated these concerns. All public concerns need to be addressed prior to arriving at a decision.

Yours Sincerely,
The Undersigned.

LAP Limerick Against Pollution
Trish Talty

Petition Summary: Irish Cement Limerick have applied to the EPA for a license to Incinerate up to 90 000 tons of tyres per annum and other unspecified alternative fuels.
This petition Objects to Irish Cement's EPA application (P 0029-05) and demands a public meeting.

Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
MARY O BRIEN	MARY O BRIEN			✓
Adrian Masterson	Adrian Masterson			✓
BRADY JERRAL	BRADY JERRAL			✓
NOREEN HOGARTH	NOREEN HOGARTH			✓
TOMMY COSTELLO	TOMMY COSTELLO			✓
BERNARD GENEY	BERNARD GENEY			✓
Patsy Ryan	Patsy Ryan			✓
TERRY RYAN	TERRY RYAN			✓
Paul Ryan	Paul Ryan			
Billy Ryan	Billy Ryan			
Carole Ryan	Carole Ryan			✓
Peggy Ryan	Peggy Ryan			
Maureen O'Leary	Maureen O'Leary			

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LAP - Limerick Residents Against Pollution



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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Kenneth Moran	Kenneth Moran			
Thomas Hedderley	Thomas Hedderley			
Frances Carey	Frances Carey			
David O'Connell	David O'Connell			
Kathy Cokerly	K.C.			
PAMELA LYNETT	Pamela Lynett			✓
Colin Clarke	Colin Clarke			✓
Lydia O'Leary	Lydia O'Leary			✓
Paul Murphy	Paul Murphy			
Niall O'Leary	Niall O'Leary			3.
Mary O'Leary	Mary O'Leary			
Robert O'Leary	Robert O'Leary			
William O'Leary	William O'Leary			
Walter O'Leary	Walter O'Leary			

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Printed Name	Signature	Address	Would you like to be updated (Y/N)
Helen Wren	Helen Wren		Y
Sandra Walker	Sandra Walker		N
Imelda Morahan	Imelda Morahan		
MARZENA Szwarc	Marek Szwarc		
Rene Downes	Rene Downes		
Orla AHERN	Orla AHERN		
Mary Cullen	Mary Cullen		
John Fitz			
Vivian Fitz			
Beatrice Gunane			✓
Colette Gunane			✓
Billy O'Leary			✓
Robert O'Leary	HARRY DUFFIN		

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Jack Kelleher	Jack Kelleher			(N)
James O'Sullivan	James O'Sullivan			(Y)
Kevin Donohue	Kevin Donohue			(Y)
Thomas Clifted	Thomas Clifted			(Y)
Shelia Donohy	Shelia Donohy			(Y)
James Gunn	James Gunn			(Y)
Shona Doyle	Shona Doyle			(Y)
Shona Doyle	Shona Doyle			(Y)
Justin Sweeney	Justin Sweeney			(Y)
Joe Leaver	Joe Leaver			(Y)
John Collins	John Collins			(Y)
Michelle Kelleher	Michelle Kelleher			(Y)
Yvonne Lee	Yvonne Lee			(Y)
P. Taggart	P. Taggart			(Y)
Rachel Gaulty	Rachel Gaulty			(Y)
Paul Kelly	Paul Kelly			(Y)

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
GER HAWKIN	<i>Ger Hawkin</i>			<input checked="" type="checkbox"/>
MARGEN SULLIVAN	<i>Margen Sullivan</i>			<input checked="" type="checkbox"/>
STEPHEN GLEESON	<i>Stephen Gleeson</i>			<input checked="" type="checkbox"/>
TUENDE BUTHER	<i>Tuende Buther</i>			<input checked="" type="checkbox"/>
MICHELLE SLATTERY	<i>Michelle Slattery</i>			<input checked="" type="checkbox"/>
MARY SHANAHAN	<i>Mary Shanahan</i>			<input checked="" type="checkbox"/>
MARY MORAN	<i>Mary Moran</i>			<input checked="" type="checkbox"/>
GERALD MORAN	<i>Gerald Moran</i>			<input checked="" type="checkbox"/>
SHEILA O'BRIEN	<i>Sheila O'Brien</i>			<input checked="" type="checkbox"/>
TOM O'BRIEN	<i>Tom O'Brien</i>			<input checked="" type="checkbox"/>
SUSAN HALVEY	<i>Susan Halvey</i>			<input checked="" type="checkbox"/>
MICHAEL MCGRAW	<i>Michael McGraw</i>			<input checked="" type="checkbox"/>
JANE DARTON	<i>Jane Darton</i>			<input checked="" type="checkbox"/>
SIOBHAIN O'NEILL	<i>Siobhain O'Neill</i>			<input checked="" type="checkbox"/>
GARY COOKE	<i>Gary Cooke</i>			<input checked="" type="checkbox"/>
JOANNE FITZGERALD	<i>Joanne Fitzgerald</i>			<input checked="" type="checkbox"/>

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
CLAIRE SADLER	<i>Claire Sadler</i>			yes
Brendan Keane				
BRENDAN KEANE	<i>Brendan Keane</i>			yes
SARAH KENNEDY	<i>S Kennedy</i>			yes
JESSICA O'CONNOR	<i>J O'Connor</i>			yes
Elia O'Connell	<i>Elia O'Connell</i>			yes
FATHIMA KAKAR	<i>Fathima Kakar</i>			yes
Mary Timmons				yes
JOHN McKEY	<i>J. McKey</i>			yes
Daniel Fitzgerald	<i>D Fitzgerald</i>			yes
PAT HEVERON	<i>Pat Heveron</i>			yes
Paul Tobin	<i>Paul Tobin</i>			yes
CHRISTINE SHEAHAN	<i>Christine Sheahan</i>			yes
Patricia O'Connell	<i>Patricia O'Connell</i>			yes
E. Callaghan	<i>ESTHER CALLAGHAN</i>			yes
K. Flynn	<i>K Flynn</i>			yes

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Leann Barrett	<i>[Signature]</i>			Y
Pat Hayes	<i>[Signature]</i>			Y
Paul Howard	<i>[Signature]</i>			Y
Charlie Morgan	<i>[Signature]</i>			
ANNETTE MURPHY	<i>[Signature]</i>			
Kathleen Curtin	<i>[Signature]</i>			
Patricia Moran	<i>[Signature]</i>			
John Harte	<i>[Signature]</i>			Y
Deborah Fitzgerald	<i>[Signature]</i>			Y
Georgina O'Brien	<i>[Signature]</i>			Y
Carol Mullen	<i>[Signature]</i>			Y
Stephen Harte	<i>[Signature]</i>			Y
Ann Marie O'Brien	<i>[Signature]</i>			Y
Mary Gaskin	<i>[Signature]</i>			Y
MAHON GUNTER	<i>[Signature]</i>			Y
Gerard Ryan	<i>[Signature]</i>			Y

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Patience Joyce	Patience Joyce			
James J. Madden	James J. Madden			
NAURA O'NEILL	Naura O'Neill			
Leo Morrison	Leo Morrison			
NIAL IMBOSCH	Nial Imbosch			
KELLY GALLAGHER	K. Gallagher			
NOAH GAY	Noah Gay			
Rosemary Ryan	Rosemary Ryan			
SIM RYAN	Sim Ryan			
GER MURPHY	Ger Murphy			
JOAN CREHAN	Joan Crehan			
JOAN CREHAN	Joan Crehan			
JOAN CREHAN	Joan Crehan			
BRIAN O' SHUGHNESSY	Brian O'Shughnessy			
Michael O'Sullivan	Michael O'Sullivan			
Tim O'Driscoll	Tim O'Driscoll			

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Printed Name	Signature	Address	Would you like to be updated (Y/N)
Vania Cullen	V. Cullen		Y.
Marie Fitzgerald	M. Fitzgerald		N.
Georgie Fitzgerald	G. Fitzgerald		Y
KAY SEXTON	Kay Sexton		Y
Tony Lyons	Tony Lyons		Y
SHIRAZ ENGLISH	S. English		-
Martin Fitzgerald	Martin Fitzgerald		
Lukasz Slawinski	Slawinski		-
C. Mooney	C. Mooney		-
Emma O'Leary	Emma O'Leary		-
Raven McNamara	R. McNamara		-
Helene Hayes	Helene Hayes		Y
Tanya Darnell	Tanya Darnell		Y
Bob Ryan	BEVEDERE LANE		Y
Mary Kennedy	MARY KENNEDY		
John Flynn	John Flynn		Y

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Public records. We will
ann above. You have

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
PAULINE LEAHY	<i>Pauline Leahy</i>			Y
Solra Cromie	<i>Solra Cromie</i>			Y
Alice Cromie	<i>Alice Cromie</i>			Y
Deirdre Quicke	<i>Deirdre Quicke</i>			
Deirdre W.D.	<i>Deirdre W.D.</i>			
Carol Sumner	<i>Carol Sumner</i>			
Rosa Scanlon	<i>Rosa Scanlon</i>			Y
Wendell	<i>Wendell</i>			Y
Carla O'Donoghue	<i>Carla O'Donoghue</i>			
Jimmy Hayes	<i>Jimmy Hayes</i>			
Valerie O'Reilly	<i>Valerie O'Reilly</i>			
Jennifer Dineen	<i>Jennifer Dineen</i>			
Sarah O'Reilly	<i>Sarah O'Reilly</i>			
Tracy Hayes	<i>Tracy Hayes</i>			
K. Rasmussen	<i>K. Rasmussen</i>			
	<i>Christine</i>			

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Printed Name	Signature	Address	Would you like to be updated (Y/N)
GERRY DUNN	[Signature]		Y
Joan Heathy	[Signature]		Y
Caroline Coughlan	[Signature]		Y
EUGENE KING	[Signature]		Y
MICHAEL McHURR	[Signature]		Y
C. SCANLON	[Signature]		Y
S. ANDERSON	[Signature]		Y
PAT KIELY	[Signature]		Y
James Connelley	[Signature]		Y
Walter Ryan	[Signature]		Yes
Terry Murphy	[Signature]		Yes
Daniel Ryan	[Signature]		Yes
Paul GORMLEY	[Signature]		Yes
Margaret Foster	[Signature]		Yes
David Keegan	[Signature]		No
Maire Foley	[Signature]		Yes

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public records. We will
column above. You have

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
TIMOTHY JOSEPH DENNELLY	<i>Timothy Dennelly</i>			N
Gabriele Neijts	<i>Gabriele Neijts</i>			Y
Reda Janbaviciute	<i>Reda Janbaviciute</i>			Y
John Spence	<i>John Spence</i>			
FABRIZIO ARAUJO	<i>Fabrizio Araujo</i>			Y
Sile Marnihan	<i>Sile Marnihan</i>			Y
RENIERKA PERINAKA	<i>Renierka Perinaka</i>			Y
WABE LA O'NEILL	<i>Wabe La O'Neill</i>			Y
DES O'LEARDAN	<i>Des O'Leardan</i>			Y
JOHN MCCABE	<i>John McCabe</i>			Y
Sharon Keef	<i>Sharon Keef</i>			Y
Elaine Benson	<i>Elaine Benson</i>			Y
Rita Ballard	<i>Rita Ballard</i>			Y
Noreen O'Connell	<i>Noreen O'Connell</i>			Y
Melissa Shire	<i>Melissa Shire</i>			Y
ELAINE MURPHY	<i>Elaine Murphy</i>			Y

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Donal Limerick	<i>[Signature]</i>			
Kate Deligan Waters	<i>[Signature]</i>			
Nora Moore	<i>[Signature]</i>			Y
David Beggs	<i>[Signature]</i>			
Pat Gilmanin	<i>[Signature]</i>			Y
Derek Greeney	<i>[Signature]</i>			Y
Eileen Hanlon	<i>[Signature]</i>			
Mary Dalton	<i>[Signature]</i>			Y
Rosie Carroll	<i>[Signature]</i>			Y
Richard Young	<i>[Signature]</i>			Y
Sarah Jane O'Mahony	<i>[Signature]</i>			Y
Ken Sheehan	<i>[Signature]</i>			Y
Aileen Carroll	<i>[Signature]</i>			Y
Charles Russell	<i>[Signature]</i>			Y
H. M. Green	<i>[Signature]</i>			Y
S. O'Donoghue	<i>[Signature]</i>			Y

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
ALICIA BOWE	Alicia Bowe			Y
LAURENCE ODUNJO	Laurence Odunjo			
KATE WHYTE	Kate Whyte			Yes
MARA GROWLEY	Mara Growley			Yes
TRIST TARRY	Trist Tarry			YES
Deirdre Kennedy	Deirdre Kennedy			
Willie Donnelly	Ailaine Donnelly			Yes
ezek	ezek			yes
Fiona Clarke	Fiona Clarke			yes
Geraldine Exton	Geraldine Exton			Yes
S. J. J.	S. J. J.			NO
FERGAL CLONESSY	Fergal Clonessy			YES
ANTHONY GORDON	Anthony Gordon			YES
MICHAEL O'DONOGHUE	Michael O'Donoghue			Yes
Chloe Bugler	Chloe Bugler			Y
James O'Connell	James O'Connell			Yes

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Deirdre Hussey	<i>[Signature]</i>			Y
Lucy Murphy	<i>[Signature]</i>			Y
MOLLY AHERN	<i>[Signature]</i>			Y
Robert Long	<i>[Signature]</i>			Y
Maria Connelley	<i>[Signature]</i>			Y
AISHA KHALID	<i>[Signature]</i>			Y
MARY McKeown	<i>[Signature]</i>			Y
AILEEN HANLEY	<i>[Signature]</i>			Y
Lynne Clufford	<i>[Signature]</i>			Y
SORCHA EVERT	<i>[Signature]</i>			Y
MARY O'BRIEN	<i>[Signature]</i>			Y
MARTIN URBANIAK	<i>[Signature]</i>			Y
Claire Bray	<i>[Signature]</i>			Y
Conor Daly	<i>[Signature]</i>			Y
SEAN GUINE	<i>[Signature]</i>			Y
BERNADETTE DAILE	<i>[Signature]</i>			Y

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Eats of Eden	Collin Cleere			Y
Cillian Cleere	Collin Cleere			Y
Cormac Wallace				Y
Ashley Hehir	Ashley Hehir			Y
Trish Tarry	Trish Tarry			Y
Martin O'Lochlainn	M O'Lochlainn			
Albert Archer	A ARCHER			
Laurent Talaga				
Elaine Finnegan	Elaine Finnegan			
Robert Earls	Robert Earls			Y
TERE PENNY	tere penny			
J.J. COSTELLO	J.J. Costello			
C.L. Barr				
E. Flood	Eileen Flood			Y
Mary Wallace	Mary Wallace			
Maifella Wallace	Maifella Wallace			

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
John Hogan	<i>John Hogan</i>			N.
PAUL DILLON	<i>Paul Dillon</i>			
NORMAN RYAN	<i>Norman Ryan</i>			
Dillon	<i>Dillon</i>			
SUE OENAGHTY	<i>Sue Oenaghty</i>			Y.
EMILIA GALLAGHER	<i>Emilia Gallagher</i>			Y.
Gerard Horgan	<i>Gerard Horgan</i>			
MARY FLORISH	<i>Mary Florish</i>			Y
Danielle Ryan	<i>Danielle Ryan</i>			D
<i>St Hayes</i>	<i>St Hayes</i>			N
<i>L. Lynch</i>	<i>L. Lynch</i>			
CLAIRE RELLIS	<i>Claire Rellis</i>			Yes.
<i>John Morris</i>	<i>John Morris</i>			No.
<i>Robert Hickey</i>	<i>Robert Hickey</i>			
<i>Billy Moran</i>	<i>Billy Moran</i>			Y/N

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Andrew Boorman	Andrew Boorman			
Ray Joyce	Raymond Joyce			Y
Andrew Greave	Andrew Greave			
Frank McNamee	Frank McNamee			
Dominic Locke	D. Locke			Y
Gary Moloney	Gary Moloney			Y
Pat O'Brien	Pat O'Brien			
Mary Heggeman	Mary Heggeman			
Noreen Kelly	N. Kelly			
SIMONE DILLON	S. Dillon			
LUKASZ CUCIOLSKI	L. Cuciolski			
Donagh Harney	Donagh Harney			Y
Clare	Clare			Y
DEANOLD DENNIS	Deanold Dennis			Y
AINE LYNCH	Aine Lynch			N
				Y

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REGISTRATION.

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
MARIAN COLLINS	M Collins			✓
LUIZA ARAUJO	Luisa Araujo			Y
Brian Hough	Brian Hough			Y
Derek O'Dwyer	Derek O'Dwyer			Y
Kevin Feeney	Kevin Feeney			✓
SARAH REGAN	Sarah Regan			Y
Margaret MacMahon	Margaret MacMahon			yes
SABRINA BEGOIN	Sabrina Begoin			yes
Willie O'Donoghue	Willie O'Donoghue			✓
CLAIRE KEATING	Claire Keating			yes
Madelyn Portley	Madelyn Portley			yes
Nicole Collins	Nicole Collins			yes
Malachy McCreech	Malachy McCreech			yes
David Ryan	David Ryan			✓

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
TOM FRIZBON	Thomas Frizell			Y
Karen Courihan	Edna Gmh			Y
Fiona Mullins	Fiona Mullins			yes
DELIA DAYLE	Delia			yes
Olivia Robinson	Olivia Robinson			yes
RACHEL ANDERSON	Rachel			YES
Pike Sebastian	Pike			YES
BEL MCC	Bel McC			Y
Joanna Lane	Joanna Lane			Y
Mary Coll	Mary Coll			Y
Ellen Battles	Ellen Batt			Y
Heather Conner	Heather			Y

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
LAURA McNAMARA	[Signature]			Y
MARIAN HERLIHY	[Signature]			Y
NICOLA MADIGAN	[Signature]			Y
MARY Caffrey	[Signature]			Y
NIAMH COOKE	[Signature]			Y
SIOBHAN MURPHY	[Signature]			Y
Cathy COOPER	[Signature]			Y
Eileen Quinn	[Signature]			Y
Deirdre Collins	[Signature]			Y
HELEN SMITH	[Signature]			Y
MARIA PHILAN	[Signature]			Y
BRICK KEARNS	[Signature]			Y
Pauline Knapp	[Signature]			N
CAROLINE LEAHY	[Signature]			N
MAUREEN Purcell	[Signature]			N

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
EO GEARY	E Geary			N
Emma Kane				
Give O'Leary	Give O'Leary			Y
Derek Bolger - HH				Y
Natalia Hedder				Y
Marcia Mason				Y
Sharon Doyle				Y
James Collins				Y



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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
ZARVENA ZAHRA NOJCEV				Y
CAND WARD				Y
Michael Kussella				Y
ANNE LAWRENCE				Y
SUSAN CLIFFORD				Y
REBECCA HOLLAND				Y
MEABH TUOHY				Y
MARION DALRYMP				Y
Angela Connolly				Y
JOANNE FOR				Y
JENNIFER FOR				Y
Conor Heenan				Y
LOND WILSH				Y



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Printed Name	Signature	Address	Would you like to be updated (Y/N)
Jim & Bernie Hartono	<i>[Signature]</i>	<i>[Address]</i>	✓
FRANCES Maylan	<i>[Signature]</i>	<i>[Address]</i>	✓
<i>[Signature]</i>	<i>[Signature]</i>	<i>[Address]</i>	✓
JEAN Cantwell	<i>[Signature]</i>	<i>[Address]</i>	✓
Mary O'Brien	<i>[Signature]</i>	<i>[Address]</i>	✓
Ann Deedigan	<i>[Signature]</i>	<i>[Address]</i>	✓
Anne Linnane	<i>[Signature]</i>	<i>[Address]</i>	✓
GERALDINE Wallace	<i>[Signature]</i>	<i>[Address]</i>	✓
Edwin O'Neill	<i>[Signature]</i>	<i>[Address]</i>	✓
James O'Neill	<i>[Signature]</i>	<i>[Address]</i>	✓
CORA FAHEY	<i>[Signature]</i>	<i>[Address]</i>	✓
SAM COLLINS	<i>[Signature]</i>	<i>[Address]</i>	✓
Ronald Murphy	<i>[Signature]</i>	<i>[Address]</i>	✓
Tracey Ryan	<i>[Signature]</i>	<i>[Address]</i>	✓
John Thompson	<i>[Signature]</i>	<i>[Address]</i>	✓

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Declan Grace	Declan Grace			
Carmel O'Brien	Carmel O'Brien			
Rose Hays	Rose Hays			
Margie Hays	Margie Hays			
Bill HOGAN	Bill HOGAN			
Patsy Brown	Patsy Brown			
Kitty Lynch	Kitty Lynch			
Aileen Mc Cormack	Aileen Mc Cormack			
Jaenita MacNamara	Jaenita MacNamara			
Asta Hogan	Asta Hogan			
Paul Fitzgerald	Paul Fitzgerald			
Vinny Brown	Vinny Brown			
Joan Brown	Joan Brown			
Maurice Nash	M. N.			
Anna O'Connell	Anna O'Connell			
Pat O'CARROLL	Pat O'Carroll			

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Printed Name	Signature	Address	Would you like to be updated (Y/N)
	<i>[Signature]</i>		
	<i>[Signature]</i>		
	Susan Alfred		
	K. O'Regan		
James Brennan	<i>[Signature]</i>		
John Lee	<i>[Signature]</i>		
John Mitchell	<i>[Signature]</i>		
Marie Murphy	<i>[Signature]</i>		
Tina Long	<i>[Signature]</i>		
John Lee	<i>[Signature]</i>		
DEREK M. AULRY	<i>[Signature]</i>		
Aileen Dowling	<i>[Signature]</i>		
	Cara Fitzpatrick		
Karen Kennedy	<i>[Signature]</i>		
William Kennedy	<i>[Signature]</i>		
Soreen Clarke	<i>[Signature]</i>		
John Clarke	<i>[Signature]</i>		

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated? (Y/N)
	<i>[Signature]</i>			
	<i>[Signature]</i>			
	Susan Alfred			
	K. O'Regan			
James Brennan	<i>[Signature]</i>			
John Lee	<i>[Signature]</i>			
John Mitchell	<i>[Signature]</i>			
Marie Murphy	<i>[Signature]</i>			
TINA LONG	<i>[Signature]</i>			Y
Lauren	<i>[Signature]</i>			
DEREK McAuley	<i>[Signature]</i>			
Aileen Scolding	<i>[Signature]</i>			
	<i>[Signature]</i>			
Karen Kennedy	<i>[Signature]</i>			
Nathan Kennedy	<i>[Signature]</i>			
Noreen Clarke	<i>[Signature]</i>			
John Clarke	<i>[Signature]</i>			

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Ann Keane	<i>Ann Keane</i>			<input checked="" type="checkbox"/>
Rita Gaudin	<i>Rita Gaudin</i>			<input checked="" type="checkbox"/>
Angela O'Leary	<i>Angela O'Leary</i>			<input checked="" type="checkbox"/>
Maureen O'Leary	<i>Maureen O'Leary</i>			<input checked="" type="checkbox"/>
John Goodwin	<i>John Goodwin</i>			<input checked="" type="checkbox"/>
Rita Gaudin	<i>Rita Gaudin</i>			<input checked="" type="checkbox"/>
Emma Kelly	<i>Emma Kelly</i>			<input checked="" type="checkbox"/>
Stephen O'Leary	<i>Stephen O'Leary</i>			<input checked="" type="checkbox"/>
Maureen O'Leary	<i>Maureen O'Leary</i>			<input checked="" type="checkbox"/>
Bernie Waddy	<i>Bernie Waddy</i>			<input checked="" type="checkbox"/>
Kat Londergan	<i>Kat Londergan</i>			<input checked="" type="checkbox"/>
Noreen Waddy	<i>Noreen Waddy</i>			<input checked="" type="checkbox"/>
Margaret Waddy	<i>Margaret Waddy</i>			<input checked="" type="checkbox"/>
Margaret Waddy	<i>Margaret Waddy</i>			<input checked="" type="checkbox"/>
Mary Brouder	<i>Mary Brouder</i>			<input checked="" type="checkbox"/>

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
ROBERT MERCIER	R Mercier			
Thomas Mercer	Thomas Mercer			
Clairice Gahan	Clairice Gahan			
Ronan O'Riscoll	Ronan O'Riscoll			
Noreen Gough	Noreen Gough			
Alice O'Connell	Alice O'Connell			
Ger O'Connell	Ger O'Connell			
Teresa Stack	Teresa Stack			
Michael Hoggan	Michael Hoggan			
Veronica Hoggan	Veronica Hoggan			
Gerard Hutchinson	Gerard Hutchinson			
Bono Fennell	Bono Fennell			
Caroline Duff	Caroline Duff			
DAVID O'NEILL	David O'Neill			
Lynne McNamee	Lynne McNamee			

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Petition Summary: Irish Cement Limerick have applied to the EPA for a license to incinerate up to 90 000 tons of tyres per annum and other unspecified alternative fuels.
This petition Objects to Irish Cement's EPA application (P 0029-05) and demands a public meeting.

Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
SIOBHAN HICKEY	<i>S Hickey</i>			
John Hanrahan	<i>John Hanrahan</i>			
KATHERINE FATHY	<i>K Fathy</i>			
MARK FATHY	<i>M Fathy</i>			
MAURICE O'LOUGHLIN	<i>M O'Loughlin</i>			
Edel Ayres				
SIOBHAN KITE				
C. CURTIS				
D. BANARON				
D. FULLER	<i>D Fuller</i>			
J. Fuller	<i>James Fuller</i>			
	<i>Nathan Fuller</i>			
SUE DELMON	<i>S Delmon</i>			
DEBORAH FITZGERALD	<i>Deborah Fitzgerald</i>			
Brenda Ringrose	<i>B Ringrose</i>			
PIONA FITZGERALD	<i>P Fitzgerald</i>			

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This petition Objects to Irish Cement's EPA application (P 0029-05) and demands a public meeting.

Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Joe Malloy				
DAVID O'CONNOR	<i>[Signature]</i>			
Ramon O'Connell	<i>[Signature]</i>			
DIAMHO CONNOR	<i>[Signature]</i>			
Harold O'Connell	<i>[Signature]</i>			
Collette Connolly				Y
Dennis Connolly	<i>[Signature]</i>			
John Sexton	<i>[Signature]</i>			
PAT JONES	<i>[Signature]</i>			
Jean Blanton	<i>[Signature]</i>			N
John Curran	<i>[Signature]</i>			
STELLA KIBEL	<i>[Signature]</i>			YES
ANNE KIBEL	<i>[Signature]</i>			YES
Valerie Ryan	<i>[Signature]</i>			YES
Lillian Giff	<i>[Signature]</i>			YES
MARGARET HURLEY	<i>[Signature]</i>			YES

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Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
Cecanne Heffernan	<i>Cecanne Heffernan</i>			Y
Paul Rocco	<i>Paul Rocco</i>			Y
Clare Roca	<i>Clare Roca</i>			Y
Brian Walsby	<i>Brian Walsby</i>			Y
Beverly Oates	<i>Beverly Oates</i>			Y
Aiden Zimbo	<i>Aiden Zimbo</i>			Y
Magdalena Rodriguez	<i>Magdalena Rodriguez</i>			Y
Rachel O'Rourke	<i>Rachel O'Rourke</i>			Y
Declan Howard	<i>Declan Howard</i>			Y
Padraig O'Donoghue	<i>Padraig O'Donoghue</i>			Y
Kevin McCann	<i>Kevin McCann</i>			Y
Kate Heneghan	<i>Kate Heneghan</i>			Y
Ed Hayes	<i>Ed Hayes</i>			Y
Adrian Hogan	<i>Adrian Hogan</i>			Y

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LAP - Limerick Residents Against Pollution



EPA - Licence P0029-05

Petition Summary: Irish Cement Limerick have applied to the EPA for a license to incinerate up to 90 000 tons of tyres per annum and other unspecified alternative fuels.
This petition Objects to Irish Cement's EPA application (P 0029-05) and demands a public meeting.

Printed Name	Signature	Address	Email/Mobile (Optional)	Would you like to be updated (Y/N)
SIMON WALE	<i>S. Wale</i>			Y
SHAWN BRADLEY	<i>Shawn Bradley</i>			Y
JOHN MCCORMACK	<i>John McCormack</i>			Y
MAURICE HANLEY	<i>Maurice Hanley</i>			Y
MARY KENNEDY	<i>Mary Kennedy</i>			Y
M. W. BROWN	<i>M. W. Brown</i>			Y
B. HARRIS	<i>B. Harris</i>			Y
M. BROWN	<i>M. Brown</i>			Y
M. HARRIS	<i>M. Harris</i>			Y
J. HARRIS	<i>J. Harris</i>			Y
M. SWEENEY	<i>M. Sweeney</i>			Y
JOHN BYRNE	<i>John Byrne</i>			Y
GAIL MCCORMACK	<i>Gail McCormack</i>			Y
JOHN HARRIS	<i>John Harris</i>			Y
M. HARRIS	<i>M. Harris</i>			Y
J. HARRIS	<i>J. Harris</i>			Y

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Petition Number: 10-1

This petition Objects to Incinerate up to 90 000 tons of furor per annum

[illegible]

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Christina Kavanagh

Sbm No: 1051

From:
Sent: 11 July 2016 23:31
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

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Objection 4

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Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Objection 6

I'm concerned that the storage of 1,000's of tonnes of tyres represents a fire risk not to mention the risk of contamination of the Gouldavoher aquifer as a consequence of any fire.

Objection 7

I'm concerned that the storage of 1,000's of tonnes of bio-solids and industrial solvents risks leaching of contaminant into the Gouldavoher aquifer, polluting the ground-water and the Shannon Estuary.

Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

Objection 9

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Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Agata Kolakowska

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From:
Sent: 11 July 2016 23:28
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Marina Khan

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Christina Kavanagh

Subm NO: 1049

From:
Sent: 11 July 2016 22:57
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Malgorzata Hopkowicz

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From:
Sent: 11 July 2016 22:18
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Urszula Siurek

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Christina Kavanagh

Sbm No: 1047

From:
Sent: 11 July 2016 21:29
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Paulina Holda

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Christina Kavanagh

Subm No: 1046

From:
Sent: 11 July 2016 18:25
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Malgorzata Tecza

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Christina Kavanagh

Sbm No: 1045

From:
Sent: 11 July 2016 17:47
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Karolina Lakoma

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From:
Sent: 11 July 2016 17:38
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

Stop it now! To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

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Objection 4

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Wioleta Wlodarczyk

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From:
Sent: 10 July 2016 14:59
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Sean Costello

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Christina Kavanagh

Subm No: 104

From:
Sent: 10 July 2016 12:47
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Eva O rourke

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From:
Sent: 10 July 2016 12:30
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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John Sheehan

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From:
Sent: 10 July 2016 11:13
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Ursula Looby

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Christina Kavanagh

Subm No: 1039

From:
Sent: 10 July 2016 07:56
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Angela Leahy

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From:
Sent: 09 July 2016 23:30
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Carol Rainsford

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From:
Sent: 09 July 2016 08:06
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Peadar Rice

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From:
Sent: 08 July 2016 13:47
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Objection 11

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Ryszard Wozniak

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From:
Sent: 07 July 2016 14:48
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

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Enda Sheehy

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From:
Sent: 07 July 2016 14:06
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Leon Brewer

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From:
Sent: 07 July 2016 13:49
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

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Aileen Wall

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From:
Sent: 07 July 2016 11:08
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

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Deirdre O'Donovan

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From:
Sent: 07 July 2016 08:41
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Elaine Frankin

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From:
Sent: 06 July 2016 13:59
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

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andv moore

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6th July 2016

To whom it may concern,

Clarina branch of the IFA are writing to lodge an objection to the proposal by Irish Cement Limited to locate an incinerator as part of new waste management handling infrastructure at Castlemungret, Limerick. Our concerns and objections are outlined below. Please give these objections due consideration

1. We as a group have serious concerns based on management failures in the past, on their ability to oversee the installation and operate successfully new processes and technology's which will have to be added to the aging infrastructure.
2. As primary food producers we are already affected by emissions and blowouts from the current cement kiln, which disperses material onto our lands. Therefore when future similar incidents occur there will be emissions of both toxic and undetermined nature. This will result in a huge risk to the food chain and our national green status which will affect our reputation and ability to sell to key internal and external markets.

Due to the reasons outlined above members of Clarina IFA are calling for an oral hearing to be held by the EPA as a matter of extreme urgency in order to address the above issues which will have a major effect to the national food production if the proposed development is allowed to proceed.

Thanks in advance for your consideration.

Barry Murphy

Barry Murphy
Chairman, Clarina IFA

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Christina Kavanagh

From:
Sent: 06 July 2016 11:45
To: Licensing Staff
Subject: New submission entered for Reg no: P0029-05. (Reference Number: P0029-05-160706114351)
Attachments: P0029-05 Submission from IFA Clarina Branch.pdf
Importance: High

Title: Mr
First Name: Barry
SurName: Murphy
Organisation Name: Irish Farmers Association IFA

Address Line 1:

Address Line 2:

Address Line 3:

County:

Post Code:

Email:

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Christina Kavanagh

Subm No: 1027

From:
Sent: 06 July 2016 10:05
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

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I base my objections on the following points:

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Marjorie McHenry

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From:
Sent: 06 July 2016 08:28
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

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Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

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Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Paddy Meakin

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From:
Sent: 05 July 2016 19:19
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

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Objection 4

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Objection 5

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Grace Stack

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From:
Sent: 05 July 2016 11:04
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Georgina Buffini

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From:
Sent: 05 July 2016 00:47
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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Sean Cleary

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From:
Sent: 05 July 2016 00:08
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Marianne Creyf

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Subm No: 1021

3rd July 2016

Reference P0029-5

Dear Sir/Madam.

I wish to make a submission to the application made by Irish Cement Limerick - for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

Having lived in Raheen for a number of years I am more than familiar with occasional dust showers coming from the plant. Will there be an increased risk of dangerous emissions with the change in use of the plant.

I'm also concerned at the increased risk of introducing dioxins into the local densely populated environment so close to schools, sports clubs, young population areas and the major regional hospital.

The monitoring and control of the proposed development does not seem at all adequate for this site development. Fully independent air and water monitoring should be put in place to ensure there is no adverse impact to the local environment, wildlife and population base.

Regards,

Mark

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Christina Kavanagh

From: Mark Battelle
Sent: 04 July 2016 23:09
To: Licensing Staff
Subject: New submission entered for Reg no: P0029-05. (Reference Number: P0029-05-160704110819)
Attachments: Submission_04072016.docx
Importance: High

Title: Mr
First Name: Mark
SurName: Battelle
Organisation Name:

Address Line 1:

Address Line 2:

Address Line 3:

County:

Post Code:

Email:

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Christina Kavanagh

Subm No: 1020

From:
Sent: 04 July 2016 19:30
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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caroline kuyper

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From:
Sent: 04 July 2016 19:10
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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Margaret Heneghan

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From:
Sent: 04 July 2016 17:48
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

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conor mahon

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Subm No. 1017

Residents Alliance for a Clean Environment

Date: 28/06/2016

To: The Environmental Protection Agency

Subject: Opposition to Licence P0029-05

Reference number:	P0029-05
Applicant:	Irish Cement Factory
Address:	Castlemungret, Mungret, Co. Limerick

Dear Sir/Madam,

Please find our objections to the incineration of tyres and other waste material at the Irish Cement factory in Castlemungret, Mungret, Co Limerick.

The objections are based on 12 areas of concern:

1. Seveso Directive:

Article 12 of the Seveso Directive [2003/105/EC] requires that for Member States 'the objectives of preventing major accidents and limiting the consequences of such accidents are taken into account in their land use policies and/or other relevant policies'

-It states that this is to be achieved by controls on the siting of new establishments and modifications to existing establishments, as well as developments in the vicinity of such establishments.

-Member States are required to ensure that account is taken of the long-term need to maintain appropriate distances between establishments and **residential areas, buildings and areas of public use, major transport routes as far as possible, recreational areas and areas of particular natural sensitivity or interest.**

-The Member States are also required to ensure that technical advice on the risks from an establishment is available when planning decisions are being made.

- No such risk assessment has been undertaken in this application. Given that Irish Cement LTD (ICL) Mungret have a poor record when it come to accidents (blow outs) and that the nature of business is changing to include higher risk hazardous raw material and to burn

high risk hazardous waste, any EPA Licence decision should be delayed until an independent risk assessment is conducted.

- This proposed application will have warehouses storing hazardous raw material (pulverised fly ash). The site will also house hazardous waste (Recovered Fuel), Tires and Plastics. The site is next to a Gas pipeline. The site also uses explosives.

- If there were a hazardous waste (secondary liquid fuel) or Tyre or plastic fire it would have detrimental health consequences for the whole area, city and county, releasing the most harmful toxins into the air.

- ICL Mungret have a poor record with Kiln Upsets (Blowouts) with their current reasonably stable fuel. Burning different type of waste gives rise to potential fluctuations in temperatures in the Kiln which could contribute to further blowouts or emissions not being burned off sufficiently.

- Cement kilns are not designed, constructed, operated, or intended to be used as incinerators (Dr Neil Carman 1997).

- Cement kilns are not designed to have major fail-safe combustion devices such as large afterburners that all state-of-the-art incinerators must have (Dr Neil Carman 1997).

- Given the waste material they are planning to burn, in the event of a combustion upset (blowout), the consequences for damage to health are increased due to the unfiltered toxins that would be released.

- The close proximity of Schools, playgrounds, recreational parks, sports fields, numerous residential areas, **University hospital Limerick (with a new cystic fibrosis unit), the Dialysis Unit on the dock road, a new children's respite care home**, the river, the waste water treatment plant, the electrical sub-station and local agriculture all need to be considered in the event of an accident.

2. Particle Emissions:

- Particle pollution (emissions) - especially fine particles - contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Numerous scientific studies (cited by US EPA) have linked particle pollution exposure to a variety of problems, including:

- premature death in people with heart or lung disease,
- nonfatal heart attacks, irregular heartbeat,
- aggravated asthma, decreased lung function, and increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing.

People with heart or lung diseases, **children and older adults are the most likely to be affected by particle pollution exposure**. However, even if you are healthy, you may experience temporary symptoms from exposure to elevated levels of particle pollution. (US Environmental Protection Agency, 2016)

- Burning waste has been shown to produce higher heavy metal emissions but also has the potential for other harmful emissions like dioxins and furans. These toxins cause health problems like birth defects, cancer and heart and lung problems
- A study on emissions by the European Commission showed that combustion in a cement kiln of one ton of RDF(Plastics, Cardboard, Paper and textiles), compared to hard coal, caused a significant **increase in the emission of mercury, lead, and cadmium**(carcinogen). (European Commission, Directorate General Environment,(2003). 'Refuse Derived Fuels, current practice and perspectives'. Final report.)
- ICL Mungret has given no details as to what condition their emission controls filters are in ? their age ? or their percentage effectiveness ?
- Emission filter controls in ICL Mungret are incapable of filtering particles below a certain threshold regardless of their effectiveness
- Dust from ICL Mungret is a constant problem, not just from blowouts. Local residents have been plagued over the years with dust, having to constantly clean windows and cars. Local people with respiratory problems have complained of their condition being aggravated by this dust. Often this dust is so fine that it is invisible to the naked eye but by rubbing ones finger on a window it can be felt. If you are to take house windows for example, this dust is unlikely to come from any other source as often only the windows facing the ICL facility will be affected and usually do not face a road. More information is needed as to where this dust is coming from or why it is not being reported. If it is release valves to keep the kiln temperatures under control then this is releasing unfiltered carcinogenic toxins into the air. If it is dust from other processes then it is potentially causing other serious health problems especially for children.
- With proximity of the schools, hospitals and outdoor recreational areas, I highlight again **children, people with medical issues and older adults are the most likely to be affected by particle pollution exposure**

3. Environmental Impact Statement (EIS) Inadequate:

- The Environmental Impact Statement (EIS) provided by ICL Mungret for the withdrawn P0029-04 license application to burn 210,000 tons of waste shows that proposed emissions(table 7) are exactly the same as for the current EIS provided by ICL Mungret to burn 90,000 tons. How is this possible given the difference in quantities being incinerated ?
- The EIS provided by ICL Mungret is misleading. it mentions only one emission being higher when burning waste and states it is within EU limits. It fails to mention that when compared to current predicted concentrations, new emissions are being introduced which did not exist before. Thanium, Cadmium (carcinogen), mercury and arsenic to name a few. These may be within EU limits, but these limits are based on a healthy adult **not children or people with medical issues**.
- The EIS provided by ICL Mungret is incredibly difficult to assess with regard to emissions. They use different measurements in different tables making it very difficult to make comparisons to safe limits set down by Directive 2010/75/EU

4. Geological Impacts:

- We would urge that ICL Mungret be subject to independent geological survey. firstly to assess if the site buildings and kilns have been affected by blasting. Many local residents will attest to their houses shaking when blasting occurs, they will also attest to cracks appearing in their walls.

- Has it been assessed how much raw material ICL Mungret has left to mine safely. It would appear that they have quarried to all boundaries within the current site. How much deeper can the site be quarried safely ?

5. Groundwater Contamination:

- ICL Mungret are looking to have the potassium trigger levels in groundwater increased to 25mg/l. This is 5 times the safe limits set down in the "EPA Ground water values interim report". This will affect wells, drinking water and ecology.

6. Hazardous Raw Material:

- 'Pulverised fly ash' is classed by the United States Environmental Protection Agency as a hazardous waste, containing concentrations of cancer causing heavy metals. ICL Mungret states in their application that is plans to use this as a raw material. They are building a store to house this ash. No information is shown whether this store is lined so as not to leech into groundwater. It is also not explained how it will be transferred into the process. If a conveyor belt is being used, is this conveyor belt enclosed? If not then there is a risk of the ash being whipped up by the wind making it a health hazard to employees and local residents and school children.

7. Tyre stores:

- Tyre Stores in ICL Mungret are out in the open
- Tyres attract mosquitos and vermin creating a health hazard and the potential for disease epidemic
- Tyres leech harmful contaminants in to soil and ground water

8. Infrastructure:

- ICL will have to import tyres and other waste to fulfil their energy requirements creating a greater strain on the road infrastructure and also cancelling out any CO2 savings made from not burning fossil fuels.

9. Proximity to Healthcare Facilities:

- The World Health Organisation recommends a list of exclusionary criteria should be used in cases for siting new hazardous waste management facilities. Included on this list is "stationary populations such as those of hospitals and correctional institutions"
- There is University Hospital Limerick (**with new cystic fibrosis Unit**) and Dialysis Unit on the Dock rd both in close proximity to this proposed waste incineration facility.
- There is also children's respite care facility being built on the grounds of Mungret College.
- There is a planning permission for a private hospital (application no. 133) which is open until 26/06/2018. If a License is granted to ICL Mungret, surely this puts the current owner at a financial loss, no investor is going to build a private hospital next to a waste burning facility

10. 2020 energy and climate targets:

- There has been no analysis of how much of ICL cement production is needed in Ireland and how much will be exported. Exceeding our 2020 energy and climate targets will attract fines. Importing cement does not raise our CO2 quota. Whereas exporting cement incurs penalties for the state rather than the company. This needs to be addressed.

11. Licence Length:

- 10 year licence is inappropriate. Any EIS cannot be guaranteed to remain relevant for ten years in the event of alternative technologies and new research becoming available.

12. Cumulative Impacts:

- The cumulative impacts of industry in the area has not been properly assessed. Particle emissions can travel up to 30 km therefore Aughinish alumina, the proposed gortnadroma gasification site and other industry cumulative impacts need to be thoroughly assessed which has not been done in EIS report provided by ICL Mungret

This type of industry is not safe, we all breathe the same air. The emissions from ICL Mungret will spread over 30 KM and will affect people and agriculture. I urge the decision makers to think carefully about what effect this will have on our health but especially the health of our children. The repercussions from this decision will only be felt in years to come, by then the damage will have been done

Signed

Residents Alliance for a Clean Environment

- A copy of the residents petition signed by over 400 people objecting to this proposal was too large to attach with this file. We will forward a hard copy to your offices. This petition is ongoing at this time.

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Christina Kavanagh

From: Ivor Casey
Sent: 04 July 2016 16:42
To: Licensing Staff
Subject: New submission entered for Reg no: P0029-05. (Reference Number: P0029-05-160704044144)
Attachments: Mungret-EPA-Objection-F.docx
Importance: High

Title: Mr
First Name: Ivor
SurName: Casey
Organisation Name: Residents Alliance for a Clean Environment

Address Line 1:

Address Line 2:

Address Line 3:

County:

Post Code:

Email:

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From:
Sent: 04 July 2016 16:39
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

Due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves.

Objection 4

The kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Objection 6

I'm concerned that the storage of 1,000's of tonnes of tyres represents a fire risk not to mention the risk of contamination of the Gouldavoher aquifer as a consequence of any fire.

Objection 7

I'm concerned that the storage of 1,000's of tonnes of bio-solids and industrial solvents risks leaching of contaminant into the Gouldavoher aquifer, polluting the ground-water and the Shannon Estuary.

Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

Objection 9

I'm concerned by the possibility of noxious odours from the storage and incineration of solvents, sludge and industrial solvents especially in light of the EPA's inability to measure and monitor these risks.

Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Linda Parnell

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From:
Sent: 04 July 2016 15:58
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

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Objection 3

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Objection 4

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Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

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Objection 7

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Objection 10

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Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Siofra Kavanagh

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From:
Sent: 04 July 2016 15:43
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

Due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves.

Objection 4

The kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Objection 6

I'm concerned that the storage of 1,000's of tonnes of tyres represents a fire risk not to mention the risk of contamination of the Gouldavoher aquifer as a consequence of any fire.

Objection 7

I'm concerned that the storage of 1,000's of tonnes of bio-solids and industrial solvents risks leaching of contaminant into the Gouldavoher aquifer, polluting the ground-water and the Shannon Estuary.

Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

Objection 9

I'm concerned by the possibility of noxious odours from the storage and incineration of solvents, sludge and industrial solvents especially in light of the EPA's inability to measure and monitor these risks.

Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Jonathan Holian

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From:
Sent: 04 July 2016 14:51
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

Due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves.

Objection 4

The kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Objection 6

I'm concerned that the storage of 1,000's of tonnes of tyres represents a fire risk not to mention the risk of contamination of the Gouldavoher aquifer as a consequence of any fire.

Objection 7

I'm concerned that the storage of 1,000's of tonnes of bio-solids and industrial solvents risks leaching of contaminant into the Gouldavoher aquifer, polluting the ground-water and the Shannon Estuary.

Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

Objection 9

I'm concerned by the possibility of noxious odours from the storage and incineration of solvents, sludge and industrial solvents especially in light of the EPA's inability to measure and monitor these risks.

Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Roisin Wyley

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Subm No: 10/12

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Firstly, due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves which does not make sense and seems as if it will lead to violations.

Secondly, the kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

Finally, I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Thank you.

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Christina Kavanagh

Sub No - 1012

From: Kelly McMorrow
Sent: 04 July 2016 13:14
To: Licensing Staff
Subject: New submission entered for Reg no: P0029-05. (Reference Number: P0029-05-160704011416)
Attachments: EPA.docx
Importance: High

Title: Ms
First Name: Kelly
SurName: McMorrow
Organisation Name:

Address Line 1:

Address Line 2:

Address Line 3:

County:

Post Code:

Email:

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From:
Sent: 04 July 2016 10:34
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

Due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves.

Objection 4

The kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Objection 6

I'm concerned that the storage of 1,000's of tonnes of tyres represents a fire risk not to mention the risk of contamination of the Gouldavoher aquifer as a consequence of any fire.

Objection 7

I'm concerned that the storage of 1,000's of tonnes of bio-solids and industrial solvents risks leaching of contaminant into the Gouldavoher aquifer, polluting the ground-water and the Shannon Estuary.

Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

Objection 9

I'm concerned by the possibility of noxious odours from the storage and incineration of solvents, sludge and industrial solvents especially in light of the EPA's inability to measure and monitor these risks.

Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Hazel Scanlon

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From:
Sent: 04 July 2016 10:31
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

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Michael Scanlon

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Subm No: 1009

Date: 01-17-2016

Planning Section,

Limerick City and County Council Planning application file No: 16435

Re: Irish Cement Ltd. Current Planning Application

Industrial Emissions License application P0029-5

Dear Sirs,

I am writing to you to ask you to refuse a license to Irish Cement to burn hazardous waste in their facility in **Mungret**, Co. Limerick. I would also like to ask for an oral hearing to deal with the matter in an open and transparent manner.

I and my family live and work as farmers downwind of the Cement factory. The prevailing winds are westerly and our property is on the eastern side of the plant and some of our property is surrounded by Irish Cement land. Our relationship with Irish Cement over all the years of its operation in Mungret has been problematic with dust emissions and blowouts together with damage to our dwelling and out buildings by their blasting and quarrying operations. The dust emissions have resulted in an imbalance in the metabolism of our cattle. This took many years to identify having been examined by numerous veterinary practitioners. Eventually Dr. Tom Buttler, an animal nutritionist, after examining all the data assembled by the vets and Ag scientists of blood and herbage samples collected over 40 years, concluded that the dust from the Irish Cement plant was a source of calcium and way in excess of the needs of the animals, and the excess was excreted together with phosphorous. This resulted in a phosphorous deficiency in the cattle. The complaints to the Irish Cement were ignored and they adopted a very cavalier attitude towards us.

This current proposal to burn hazardous waste alarms us greatly:

- 1 By past experience of how they ignore problems and stonewall complaints.
2. By attempting to combine an old Kiln with and incinerator that has been modified and has a history of blowouts. I refer in particular to the 16 October 2006 when a hole formed in the wall of the kiln and caused the local area to be covered in brown dust.
3. Self-regulation is woefully inadequate in such a serious operation.
4. The risk to personal and public health from emissions.
5. The risk to the environment, adjacent to the site is a major waterway, the River Shannon which has a number of environmental protection designations for habitats and species including NHA, SAC, SPA and Natura 2000 site.

6 Schools and Limerick Regional hospital are downwind of the facility.

7 The risk to the national and local image of our food industry, renowned for its green image and quality, that has been built up over many years. One incident similar to the blowout in 2006 could wipe out all that.

This greedy cost cutting proposal of Irish Cement has the potential to damage and injure public health and put the economic wellbeing of the food industry in jeopardy. May I again ask that you refuse Irish Cement a License for this facility and conduct an oral hearing.

Yours faithfully

Michael Gabbett

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Christina Kavanagh

From: Wexford Receptionist
Sent: 04 July 2016 10:30
To: Licensing Staff
Subject: FW: Objection to Irish Cement Licence application P00029-5
Attachments: Objection to Irish Cement EPA P0029-05.docx

Morning,

Please see email below that was received through info@epa.ie. Thanks.

Kind regards

Maria Harney
Duty Receptionist/Programme Officer
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
Wexford
Y35 W821

Bosca Poist 3000, Eastát Chaisleán Bhaile Sheáin, Contae Loch Garman.

Tel: 00353 53 91 60600: Fax: 00353 53 91 60699: Email: info@epa.ie web: www.epa.ie
Lo Call: 1890 33 55 99

Environmental Protection Agency on Twitter:
<http://twitter.com/EPAIreland>
EPA Climate Change on Twitter:
<http://twitter.com/EPAClimateNews>
EPA Research on Twitter:
<http://twitter.com/EPAResearchNews>
YouTube:
<http://www.youtube.com/user/epaireland>

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From: Anne Gabbett
Sent: 03 July 2016 21:30
To: Wexford Receptionist
Subject: Objection to Irish Cement Licence application P00029-5

To EPA Licensing.

Attached is my letter objecting to the licence Application P00029-5 Irish Cement ,Mungret, Co Limerick to burn hazardous waste.

A hard copy has been sent by post on Friday July 1st

Yours Sincerely
Michael Gabbett

--

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From:
Sent: 04 July 2016 10:11
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

Due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves.

Objection 4

The kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Objection 6

I'm concerned that the storage of 1,000's of tonnes of tyres represents a fire risk not to mention the risk of contamination of the Gouldavoher aquifer as a consequence of any fire.

Objection 7

I'm concerned that the storage of 1,000's of tonnes of bio-solids and industrial solvents risks leaching of contaminant into the Gouldavoher aquifer, polluting the ground-water and the Shannon Estuary.

Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

Objection 9

I'm concerned by the possibility of noxious odours from the storage and incineration of solvents, sludge and industrial solvents especially in light of the EPA's inability to measure and monitor these risks.

Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids.

Brid Nix

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From:
Sent: 04 July 2016 08:46
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Michael Scanlon

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From:
Sent: 04 July 2016 08:35
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Eileen Carroll

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From:
Sent: 04 July 2016 00:57
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Danielle Gavin

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From:
Sent: 03 July 2016 22:53
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

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Áine Ní Cheannaháin

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From:
Sent: 03 July 2016 22:00
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

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PJ OMahony

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Dear EPA, Please say no to Irish Cement's proposals to incinerate tyres, industrial solvents and plastics in a Limerick City suburb

Irish Cement have applied for an Environmental Protection Agency license (Industrial Emissions license application P0029-5) to incinerate 210,000 tonnes of waste at Castlemungret on the outskirts of Limerick City. That means whole tyres, including their steel belts, plastics, industrial solvents and bio-solids including dehydrated sewage sludge.

The company's planning application to Limerick City and County Council for new waste-handling infrastructure – including transport and storage of a million tyres a month - has already attracted 76 objections. This Industrial Emission application refers to 90,000 tonnes of tyres, not the 210,000 tonnes of waste mentioned in the Environmental Impact Assessment submitted to the EPA. What does the remaining 120,000 tonnes of waste consist of?

Environmental Initiative or Money-Making Opportunity?

Irish Cement have positioned this as an "alternative fuels" proposal for their cement production for environmental reasons. They currently use imported petroleum-coke, a very low grade coal. But there's a ready supply of higher quality coal and natural gas available which would give even better emission reductions than these 'alternative fuels'.

Are they really trying to improve their carbon footprint? Or are Irish Cement putting our food chain, agriculture and the health of our kids at risk to create new incineration revenue streams and higher margins from a 30 year old cement kiln? There are better options for reducing emissions, and Irish Cement know it.

A backward step for a proud, resurgent European City?

How will our city attract the visitors, companies, professionals, students, teachers this city needs to grow and develop with this blot on our landscape? Would another Uber move to Limerick with this on its' doorstep? Can Limerick retain its' place in Site Selection Magazine's list of Europe's Top 10 Cities to Invest if the Industrial Incineration proposal goes ahead? Can Limerick be both Europe's City of Culture and Ireland's City of Industrial Incineration in 2020?

We know the kiln is old. There's already a problem with combustion blow-outs showering the southern suburbs with layers of cement dust. What happens when future blowouts contain carcinogenic Dioxins? What happens to the milk and beef production in neighbouring farms? How will these toxins affect kids across the city?

Accidents aside, what will be the average daily dioxin emission level? Who will measure it now that the EPA has shut-down the Limerick Air Quality measuring facility? How will Irish Cement control these poisons? How will the public know if the dioxin control systems are working correctly?

Dioxins – Do Irish Cement have the Smarts to Manage the Risk?

The process of incineration produces Dioxins especially when plastics are burned. Incineration also creates ultrafine particles that can cause serious respiratory and heart problems. Dioxins enter the food chain and are ingested by humans to accumulate in fatty tissue. According to the WHO Dioxins are highly toxic, persistent environmental pollutants (POPs) which can cause reproductive and developmental problems, damage the immune system, interfere with hormones and also cause cancer.

Modern municipal incinerators attempt to minimise these risks with control systems, fail-safe mechanisms, sophisticated filtration and specialist staff. But even they can't eliminate the risks. So how will a 30 year-old cement kiln in a 70 year-old factory with no specialist staff do it?

A global expert on the hazards of industrial incineration Prof. Paul Connett, Professor Emeritus at St. Lawrence University, New York says "I am opposed to waste incineration in purpose-built facilities, but when you burn the waste in cement kilns you are taking it out of the hands of professionals and giving it to amateurs"

We've asked for a public meeting with Irish Cement to come clean on their plans. They've refused.

What You Must Do Before July 4th

If you're concerned about any of the points raised here then you must object to the EPA before the 4th of July 2016.

Irish Cement has done a great job keeping the EPA licence application, and the risks, off the radar. The company hasn't been transparent and most people affected by this application are unaware of it. The wrong decision will mean long-term health issues for Limerick City and for the region. We owe it to future generations to weigh up this proposal carefully before it goes ahead. But, there isn't much time before the 4th of July.

The company's Industrial Emissions License Application P0029-05 must be rejected. Future Industrial Emissions License Applications by Irish Cement must convince the public that the company has the safeguards in place to guarantee our health and protect our food chain. The EPA must reassure the public that it has the tools, the skills and the will to take punitive action if the company exceeds its emission limits.

We've prepared some points you may consider including in your objection. Uplift will ensure your objection goes directly to the EPA and that your concerns are recorded. You may also add you own personal objection.

But remember, you must act now as the deadline is the 4th of July.

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone. Despite calls for a public meeting to address the concerns of Limerick residents before making any change, Irish Cement have refused. Why the reluctance to explain to the public how they will keep us safe while implementing this change in their process. Failure to consult with the public merely fosters fear, anger and justified resistance.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

Due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves. We've seen with the Volkswagen emissions scandal that large companies are more than happy to cheat emissions testing in order to ensure that profits are maintained. I believe that it would be extremely foolish of us to assume that emissions restrictions will be adhered to without rigorous independent monitoring.

Objection 4

The kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

Objection 5

I'm concerned that Industrial Incineration should be introduced just three miles from the city centre, upwind of the prevailing winds and less than a mile from Limerick City and County's newest high-amenity area, proposed primary and secondary schools, the new Mungret public park and a large area zoned for new residential development.

Objection 6

I'm concerned that the storage of 1,000's of tonnes of tyres represents a fire risk not to mention the risk of contamination of the Gouldavoher aquifer as a consequence of any fire.

Objection 7

I'm concerned that the storage of 1,000's of tonnes of bio-solids and industrial solvents risks leaching of contaminant into the Gouldavoher aquifer, polluting the ground-water and the Shannon Estuary.

Objection 8

I'm concerned by the possibility of poor controls in the importation and selection of industrial waste for incineration. How does Irish Cement plan to control the burning of dangerous industrial substances including Halogenated materials?

Objection 9

I'm concerned by the possibility of noxious odours from the storage and incineration of solvents, sludge and industrial solvents especially in light of the EPA's inability to measure and monitor these risks.

Objection 10

I'm concerned, given the high levels of beef and dairy production close to the plant of the risks of dioxin poisoning to our food chain as well as the reputational risk to our local agriculture.

Objection 11

I'm concerned that Industrial Incineration will become a large revenue stream to Irish Cement resulting in ever increasing importation of tyres and industrial waste. I'm particularly concerned by the risk of insects, viruses and unknown contaminants entering the country borne by tyres, industrial plastics and bio-solids. How would Irish Cement mitigate the risk of Zika virus borne by imported tyres for example?

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Christina Kavanagh

Sub : 1002

From: Richard Kennedy
Sent: 03 July 2016 20:04
To: Licensing Staff
Subject: New submission entered for Reg no: P0029-05. (Reference Number: P0029-05-160703080042)
Attachments: Uplift (DOD) (2).doc
Importance: High

Title: Mr
First Name: Richard
SurName: Kennedy
Organisation Name:

Address Line 1:

Address Line 2:

Address Line 3:

County:

Post Code:

Email:

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From:
Sent: 03 July 2016 19:19
To: Licensing Staff
Subject: Objection Re: Irish Cement application - P0029-5

Licensing EPA
Licencing | Environmental Protection Agency

To whom it may concern,

I wish to object to the application made by Irish Cement Limerick - reference number P0029-5 for a license to burn tyres at their facility in Castlemungret, Co. Limerick.

I base my objections on the following points:

Objection 1

I'm concerned by the lack of public consultation on these changes which has severely eroded public trust in this application. Irish Cement claim to have distributed leaflets and held a public meeting, however, by their own admission they only distributed 500 leaflets about this meeting which is woefully inadequate when one considers that there are 6,900 households in the Ballycummin electoral area alone.

Objection 2

I'm concerned that readily available options, including available natural gas are not being used to reduce Irish Cement's carbon emissions despite the reduced health risks and the recent construction of a new gas feeder to Castlmungret.

Objection 3

Due to budget cut-backs the EPA have shut down their Limerick Air Quality measuring facility. I'm concerned that the EPA will be unable to monitor the output from the incinerator. With no independent monitoring of the emissions it will be up to Irish Cement to monitor themselves.

Objection 4

The kiln in the Irish Cement factory is old and was never designed to burn tyres or waste materials. Residents in the Raheen and Dooradoyle area are already familiar with the dust blowouts that occur when the plant malfunctions. I'm concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. I'm concerned that Irish Cement to not have the control systems, safety fail-safes and expert staff to maintain the consistently high temperatures and manage an incinerator of this scale without increased risk of contaminating nearby farms and residential areas especially in light of their poor track record of regular dust blowouts.

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Derek O Grady

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