



Submission

Submitter:	Ms Finola Keogh
Submission Title:	Rec'd via email
Submission Reference No.:	S005379
Submission Received:	10 March 2019

Application

Applicant:	Irish Cement Limited
Reg. No.:	P0029-06

See below for Submission details.

Attachments are displayed on the following page(s).

*For inspection purposes only.
Consent of copyright owner required for any other use.*

From: Finola Keogh
Sent: 10 March 2019 14:57
To: Licensing Staff
Subject: Objection to License Application P0029-06 to allow CRH to begin Industrial Incineration in Limerick

Dear Environmental Protection Agency,

Dear EPA,

Objection 1 - In July of 2018, The Cement Plant in Mungret was summoned to Limerick District Court due to poor environmental performance and fugitive dust emissions. The company was convicted of two counts of breaching its industrial emissions licence when “fugitive dust” emitted from the plant “impaired” or “interfered” with the surrounding environment. This prosecution was due to public pressure, and publicly funded lab tests, not through routine enforcement by the EPA. We believe this light touch approach to measurement and enforcement is unacceptable. Without a radical change by the EPA and a move away from toothless sanctions the EPA must not allow an increase in toxic emissions.

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 Mungret. This change puts public health at risk to protect private profits.

Objection 3 - The EPA is over-reliant on self-monitoring by polluters. The EPA have shut down their Limerick Air Quality measuring facility at Park Road. 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. We need a wide network of independent monitoring stations capable of monitoring particulate emissions, oxides of nitrogen and sulphur and heavy metal emissions.

Objection 4 - I’m concerned by the potential emission of highly toxic carcinogenic dioxins should a malfunction occur while hazardous waste is being burned. Irish Cement don’t 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. Despite this the EPA does not have an action plan to measure dioxin emissions and depositions on agriculture and on the food-chain.

Objection 5 - I’m concerned that Industrial Incineration is proposed 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, new primary and secondary schools, the new Mungret public park and a large area zoned for new residential development. Recently measured spikes in particulate emissions exceeded the WHO daily Safe Limit value and the CAFE Directive limit by up to 8 times and the annual limit by up to 22 times. What precautionary measures, if any, should parents, teachers and school principals take? What happens when a spike coincides with school breaks when kids are in the playground? How does this correlate to incidences of asthma, bronchial ailments and pulmonary disease in the southern suburbs? Should users of the public park in Mungret or at the local GAA and Soccer Clubs be notified of a potential threat? Who is responsible for assessing the health risks of dangerous variability in emissions levels, as opposed to the averages that might mask real hazards? Who is responsible for determining risk thresholds and providing guidance and warnings (or reassurance if appropriate) to the public? If the pre-existing risks to public health are so poorly understood how can any of us, in good conscience, stand by while a light-touch EPA lets a private company significantly increase these risks for no other reason than to increase profits?

Objection 6 - 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 undermining Ireland's commitment to recycling and to the circular economy. Irish Cement wants to turn its Cement Factories into lucrative industrial incinerators. They get paid to burn toxic waste and Cement becomes a low-cost by-product. This initiative is not being led by Cement Factory veterans. They've hired-in executives from the waste industry to drive huge increases in profits. Our health and the health of our kids isn't part of the equation.

Objection 7 - I'm concerned that the HSE, by its' own admission, does not have the expertise to assess the risk of industrial incineration on public health. It does not have the data or the resources to understand or investigate the clusters of cancer and pulmonary ailments that have been described in the vicinity of the plant over many decades. If there are significant unknown health risks with the existing process how can we allow that risk to be radically increased, by a firm just emerging from the penalty box and currently facing prosecution, with an EPA that refuses to enforce and a local council that's deaf to public concerns?

Objection 8 - I'm concerned that CRH continues to blackmail local residents with threats of job losses despite having a profitable operation, decades of available limestone and a lucrative source of carbon credits in Mungret, which can continue into the future without changing to industrial waste incineration.

Objection 9 - I'm concerned by CRH's lack of transparency and their refusal to meet in public, their refusal to acknowledge some level of increased risk. The offer to meet small groups on plant tours and their reluctance to acknowledge ANY level of risk only increased the lack of public trust.

Objection 10 - I'm concerned with CRH's history of corruption here and abroad.

Objection 11 - CRH breached its licence for dust emissions in 2004, 2015 and as recently as April 2017. As recently as last year CRH denied responsibility for dust blowouts until Slí Na Manach residents requested that samples be analysed prompting the EPA to reluctantly prosecute and to put CRH in the sin bin. I'm concerned that no enforcement would have occurred if the public had relied on CRH to self-regulate or the EPA to police their operation.

Objection 12 - I'm concerned with the reliability of CRH's operation. The cement kiln is 35 years old; it will undergo simple modifications to accept whole tyres and pre-processed industrial waste. The staff have no special expertise in dealing with waste incineration. They've had no special training to deal with industrial waste incineration. Contrast this with Covanta, a specialist global company operating the brand-new facility in Poolbeg. With brand new hardware, fully qualified staff, specialist training and the latest fail-safe hardware and software that, despite training, they managed to put 11 people in hospital in its' first month of operation in 2017. How can anyone honestly say this is zero risk.

Objection 13 - I'm concerned that the risks from dioxins, furans and heavy metals caused by unfiltered low temperature fugitive emissions from apertures, preheater towers, during routine maintenance, and emergencies have not been acknowledged or assessed. These risks have not been addressed through increased monitoring or mitigation.

Objection 14 - I'm concerned that carcinogenic PCBs, dioxins and furans that are not thermally destroyed within the kiln may be encapsulated in the clinker and incorporated into the final cement product representing a risk during construction, occupation and demolition of buildings. There is also a risk from toxic dust emitted in the grinding process.

Objection 15 - Dioxins are among the most toxic substances known. I'm concerned that the EPA has not indicated how it plans to measure dioxin micro-particle deposition over a 30km radius of Mungret of the consequences of dioxins entering the food-chain.

Objection 16 - Whole tyres, including the steel cords, will be burned in Mungret as opposed to the shredded

tyres in burned in Drogheda, because they're easier to handle. I'm concerned that this represents an additional risk from heavy metal emissions, meaning greater risks for public health and greater profits for CRH.

Objection 17 - CRH's application identifies 114 categories of industrial waste, used both as fuel and as "alternative raw materials" for cement to be incinerated. I'm concerned that no evidence has been provided to show that these compilations of "fuels" and "raw materials" have been incinerated elsewhere with increases in toxicity and degradation of human health.

Objection 18 - During the An Bord Pleanala Hearings in September the Local Authority's barrister conceded that the planners hadn't done their due diligence. He claimed this was because new evidence was presented by LAP at the hearing. As a matter of fact all the evidence we presented came from the Council and Irish Cement. I'm concerned that the Limerick City and County Council executive decision to support industrial incineration, and its' subsequent endorsement by An Bord Pleanala was a foregone conclusion.

Objection 19 - Experts hired by CRH claim that at steady-state, high temperatures there is no risk of dioxin or furan emissions from the kiln. However, blow-outs, dust incidents and particulate emission spikes are regular occurrences with the existing, far simpler process. I am concerned that fugitive carcinogenic emissions will captured during the pre-heating process or be prevented as new alternative fuels and materials are experimented with, as cooling occurs during maintenance or as operational incidents continue to occur.

Objection 20 - I'm concerned with CRH's plans to burn toxic Red Mud from the Aughinish alumina smelter. Following a disaster at an Alumina Smelter Red Mud pond in Hungary in 2010 the town of Devecser was destroyed, 10 were killed and 150 injured. Soil samples taken by Greenpeace following the disaster showed elevated levels of arsenic, mercury, chromium, antimony, nickel and cadmium. For the first time the toxic risks of the 450 acre Red Mud pond at Foynes will be brought to our doorsteps as red mud is incinerated in Mungret as CRH truck Red Mud into Mungret and burn it in the suburbs.

Yours sincerely,

Finola Keogh

For inspection purposes only.
Consent of copyright owner required for any other use.