



Closhens  
Killarney

27<sup>th</sup> April, 2022.

Re: Appeal regarding a decision made by Kerry County Council to grant a licence (ref. AP20-01) under the Air Pollution Act 1987, as amended, to Roadstone Ltd, Fortunes Town, Tallaght, Dublin 24, for the operation of a macadam and asphalt production plant at Closhens, Killarney, Co. Kerry  
to whom it may concern

The principal emissions from the exhaust stack will be sulphur dioxide, oxide of nitrogen, particulates and other products of combustion from the production process as per Roadstone's original notice into the air & atmosphere.

SLR based their report on information supplied by the clients and for it other advisors and associates. The data has been accepted (in good faith) as being accurate.

Envirocon (page 2) Sheheree log is measured at 5 Kg N/ha/y currently higher, upper critical load value of 11.4 Kg N/ha/yr. Ref. Heney & Hare Study - Was this an actual study as opposed to a modelling reading? This is over twice the reading so how much of the other data is under declared to meet planning / environment and tick box exercises. Poison is poison and no amount of dressing up figures / charts to make it pass

is acceptable. Too much nitrogen in the water causes algae to grow faster than ecosystems can handle. Increases in algae hards water quality, food resources and habitats. It decreases oxygen that fish and aquatic life need to survive.

Water Management: Monitoring of groundwater and discharge of water from site. They may not fall within the remit of Air Emissions licence but are very concerning as to where this water ends up. Is it into the streams that feed the River Neesh which eventually flows into our renowned lakes of Killarney in Killarney National Park which is a biosphere and a special area of conservation. This in turn is drained by the River Laune which flows into Castletown Harbour, also special area of conservation and a wetland of international importance, which eventually meets up with Dingle Harbour area. The MacGillycuddy Reeks lies within the Iveragh Peninsula and the Skellig Islands lie off the west coast and are a breeding ground for puffins and gannets. I can not agree with Eoin Kelleher of Environmental Assessment Unit that there are no realistic or meaningful connecting pathways between the source, discharge and habitats. Pollutants in the air, high levels of sulphur dioxide is a particularly potent greenhouse gas, excess nitrogen also forms as aerosols in the atmosphere and is brought to land as acid rain (we don't want them in the atmosphere to start

with) flowing over pavements exposes water to pollutants, surface debris and asphalt. This polluted water flows into municipal sewerage networks which empties into lakes, rivers and streams. Asphalt will never biodegrade. Asphalt production and installations can contaminate stormwater and downstream rivers with high concentrations of solids, toxic hydrocarbons and other chemicals, oils, greases and heavy metals. Asphalt also known as bitumen is a major source of air pollution and maybe a bigger problem than emissions from all petrol and Diesel powered cars. (these quote are all on EPA site)

PAH have been determined to be highly toxic, mutagenic, carcinogenic to humans and animals. Lamprey & pearl Mussel project taking place in the Caragh catchment area require pristine water quality - and are sensitive to increase of Nitrogen in particular. Our rivers, Meek, Long Range and Lakes contain Trout salmon and an abundance of bird life, swans, ducks, herons and white tailed eagle to name a few. Killarney National Park also has a native Red Deer population ancient oak woods and yew trees. Look at Jim Johnson's statements "these emissions will give rise to atmospheric nitrogen and sulphur and could adversely impact qualifying interests at European sites through nitrogen deposition and acidification". "Taking all the foregoing into account it is considered

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that significant effects on European sites and their <sup>interests</sup> qualifying, due to emissions to air from the plant cannot be ruled out"

We would respectfully ask you, EPA, who have the power to refuse this licence as the asphalt plant will be detrimental to humans, animals, birds, habitats and future generations.

Signed Phil Horner  
Dennis Horner  
Liggett