

Dorota Richards

Subject: Appeal Letter - Operation of Asphalt Plant at Clasheen, Killarney. Reg No E0010-01

From: christopher wright [REDACTED]

Sent: Wednesday 22 September 2021 01:28

To: Wexford Receptionist <REC_WEX@epa.ie>

Subject: Fwd: Appeal Letter - Operation of Asphalt Plant at Clasheen, Killarney. Reg No E0010-01

[REDACTED]

Dorota Richards,
Programme Officer,
Office of Environmental Sustainability.

Dear Dorota,

Thank you for giving me the opportunity to make a submission/ observation on the above mentioned licence. It will be mainly observations I will be making as I do not have the technical skill or understanding of the charts in the document you sent me from Envirocon Ltd. I do not have the experience of submitting proposals nor producing technical charts, though I am very familiar with what those charts mean in layman's terms having lived alongside the Roadstone pit for the past twenty five years.

It is one thing to look at a chart and put numbers into it , it is another thing to live with the consequences of those charts and to know what it means for people living in the area and the affect it has on their lives.

In such a highly technical document the weight of the argument for the proposal, certainly going on the weight of the document would be in favour of the proposal while the arguments against are not as weighty. I do hope however that the E.P.A in reaching a decision on the Air Licence that consideration is given to the concerns of people who actually live in the area.

We feel like lab rats who have no say on the noxious discharges that will be pumped into our air, which in the event of any health impacts upon us, Roadstone can use the SLR consulting report to absolve Roadstone of any responsibility.

Potential adverse community health effects 2.1 para 3 the modeling study does not support the claims of adverse health effects. We have no modeling study, just experience of being waken up in the middle of the night by noise from Roadstone and of having our cars and windows covered in dust on a regular basis.

1. Dust Deposition

Page 3 section 2.1 of the response document notes that 4 of the 30 samples obtained were deemed unsuitable for dust fall determination due to excessive biological contamination from algae or damage to the collection jar. The report goes on to speak to the acceptable levels of dust in the 26 samples but fails to elaborate on the 4 unsuitable levels. This is 4 to many and also is an example of bias. Why have these 4 unsuitable levels not been spoken to? Please expand on these findings and clarify the what data analysis findings are on health impacts to the neighboring community in the area.

2. Smell of Asphalt Production

Page 4 section 2.3 of the document notes that the plant is designed to operate and be managed to meet BAT in terms of processes, emission abatement and modelling. It was has not stated what BAT stands for. We have concluded that this is to mean 'best available techniques. Is this correct? The documents goes on to state that that "no odour nuisance will occur beyond the sound pit boundary at Clasheen." Please provide further explanation on how this finding has been derived at. If there is a smell within the plant ground how is that this smell stops at the boundary?

3. Asphalt Plant Operating Hours

Page 5 section 2.5 of this document states that "Condition 4 attached to the current planning permission (p. Refs. 10/1163; 10/91163) sets out the permitted operating hours to the asphalt plant and states: Hours of operation shall be restricted to between the hours of 04:00 and 19:00 Monday to Saturday."

However, upon review of condition 4 this is document this refers to Notification of Licensing Authority and not operating hours as stated. Conversely, Condition 1 of the document does speak to the acceptable operating hours between "06:00 and 19:00 hours Monday to Friday inclusive and 06:00 and 14:00 Saturday." It also states that on Public Holidays the facility will not operate. The above is contradictory to the hours that Road stone are stating and also raises questions to overall credibility of what Road stone are stating and what else in this document that Roadstone are misinterpreting within the Air License Conditions Document.

4. Health Concerns for neighboring community

Through our research on this matter we would like to reference the Blue Ridge Environmental Defense League (BREDL), a regional environmental organization whom carried out a survey and found that nearly half of the residents reported negative impacts on their health from a new asphalt plant. The door-to-door health survey found 45% of residents living within a half mile of the plant reported a deterioration of their health, which began after the plant opened. The most frequent health problems cited were high blood pressure (18% of people surveyed), sinus problems (18%), headaches (14%), and shortness of breath (9%). [BREDL].

It is further understood that Toxic emissions are widely believed to cause birth defects, cancer, and other severe health impacts. Per our research we would also like to note to

reference an analytical research study that is published and was carried out by Janet Currie, Lucas Davis, Michael Greenstone, and Reed Walker. This was a research design based on more than 1,600 plant openings and closings matched to extraordinarily detailed, geocoded data yields three primary findings. First, on average, toxic air pollutants affect ambient air quality only within 1 mile of the plants, suggesting that health effects from these emissions should be concentrated in this range.

5. Future Generations – Impact on Children

In Clasheens there are young children whose health will inevitably be impacted by this plant. We understand there are various reasons (age, metabolic rate, body proportions, activity levels, growth rates) why children can be more susceptible to carcinogens than adults.

For children we recognise the consequences of exposure to toxins are serious and life-long. Recent medical studies show toxins make children more prone to asthma, allergies, cancer, heart disease and developmental delays. Considering the above, we will not accept that our grandchildren will be subject to toxins in the air living so close to this proposed plant.

The particulate matter and accompanying toxins weaken the structure and function of children's' developing lungs and weaken the lungs' ability to self-repair. Further, because these materials penetrate to the cellular level, they also disrupt the normal development of the immune system. They change the way children's DNA is read, making children more prone to asthma and allergies.

6. Increased Truck Traffic

What is the anticipated traffic impact for adding this plant to the Roadstone plant. It is feared and anticipated that the additional quantity of heavy vehicles entering and existing the site will add to traffic congestion within the Clasheen area whilst also creating additional noise and air pollution. Please advise of the estimated quantity of trucks that will be added to Roadstone operations. Furthermore has a traffic impact assessment been carried out by a third party consultant? If so, please share these findings. If not, we request one be carried out and results shared with the locality accordingly.

7. Property Values

We have serious concerns for our property values in Clasheens should this plant go ahead. We refer to the Blue Ridge Environmental Defense League (BREDL), a regional environmental organization, whom has done two studies on the adverse impacts on property values and noted that a property value study documented losses of up to 56% because of the presence of a nearby asphalt plant.

With our homes in Clasheens being in such close proximity to Roadstone it would be inevitable that our homes will too suffer a significant devaluation as a result of this proposed asphalt plant due to the varying potential nuisances that this will cause to our every day lives. With that said, has noise decibel level modeling /readings from the environmental agency been carried out?. If so please provide this data. If not, we request that this be

carried out at this proposed location and also that of other plants that are currently in operation at Road Stone. With our properties in such close proximity to this proposed asphalt plant what will be done to ensure that the local residents will not be subjected to noise pollution from Roadstone?

8. Existing Roadstone – Asphalt Plant Operations.

Whilst modelling has been provided for this site Roadstone site in Clasheen, what hasn't been provided by Roadstone is the results of the quarterly monitoring required by this licence for other Road stone sites in Ireland that are currently in operation at this time. Per condition 6, 7 and 8 of the Air License please provide the following for these site for consideration: -

1. Emissions to the atmosphere monitoring summary
2. Ambient Air and Dust Deposition monitoring summary
3. Complaints summary
4. Pollution emission and environmental incident report
5. Evaluation of the operation of the big filter.

Whilst Roadstone might argue that the above request is not relative to this site, what it will show us is how Roadstone actually comply with the conditions as set out in the Air License in the real world currently and will further reveal subsequent health, social and environmental impacts of each on the town land of Clasheen.

Finally please note that we are also in agreement with Philip and Doreen Horans letter to the EPA dated August 24th 2021. In conclusion we are strongly objecting to the granting of an air license for the operation of an asphalt plant at Clasheen, Killarney and are asking that serious consideration be given to the above observations/points.

Yours sincerely,

Christopher and Joan Wright. Jeremiah and Clare Buckley