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**Employment Health Advisers Ltd., Heritage Business Park,  
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**Private & Confidential**

Mr David McDermott,  
WYG Environmental and Planning Ireland Ltd,  
Nutgrove Office Park,  
Nutgrove Avenue,  
Rathfarnham,  
Dublin 14

23<sup>rd</sup> August, 2012

***RE: Indaver Ireland Waste to Energy Plant,  
Carranstown, Duleek, Co. Meath***

Dear David,

Thank you for asking me to comment on the proposed change of use for the above facility. As you know, I was involved in the original application to An Bord Pleanala and I researched and wrote much of the human health section of the original EIS. I also gave evidence on human health to the An Bord Pleanala oral hearing. As part of the development of this application WYG consulted with me and provided information relating to the proposed amendments to the facility and most importantly the emissions from the facility.

I understand the new application is for a 10% or 20,000 tonnes increase in annual maximum waste accepted at the facility and the inclusion of additional EWC codes which includes suitable hazardous and non-hazardous waste. It also included extension of waste acceptance and dispatch hours and additional ammonia and fuel oil storage tanks, an additional effluent treatment and engineering percolation area and conversion of the temporary to permanent status of two structures.

In the original application, there had been a number of concerns expressed in the submissions to An Bord Pleanala and subsequently at the oral hearing with regard to concerns with regard to emissions from the then proposed facility. Some of these appear to be restated now.

I understand the facility has now been in operation for a number of months. I also understand from information provided by Indaver Ireland and WYG that emission levels have been well below permitted emissions as set out in the facility licence and

indeed at times, items such as dioxins have been below detectable levels. This is very much as had been predicted by the operators of the facility but had been doubted by some individuals and groups.

I see that the new application involves additional waste acceptance. I do also note that one of the issues was that the current waste being taken has a lower thermal value than was expected. I understand this may be due to the fact that there was a lower calorific value in the waste perhaps due to a higher than expected amount of putrescible waste.

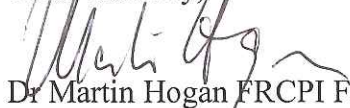
I do note that the actual incineration process and flue cleaning and energy recovering system will remain unchanged from those as built under the existing planning permission and waste licence and I understand there is no material alteration to emissions to the atmosphere from the stack and there are no increases or changes to emission limit values for stack emissions. This is confirmed in the Air Quality chapter of the EIS accompanying the current application.

I was asked to comment on the potential health effects of the additional capacity. In human health terms and environmental terms, it is not what goes into a plant which matters but rather what comes out or the emissions. I note that the emissions are well below permitted levels. It previously was assessed that even if emissions were up to permitted levels no environmental human health effects would be expected. The fact the actual emissions from the facility have proved below those levels would in my mind reassure most individuals. While there may be some concern with the proposal to take in waste classified as hazardous, again in terms of human health impacts, it is any potential changes in emissions that might result that would be of significance and I do note that there is no expected change in emissions either being foreseen or allowed. In these circumstances there will be no human health effect from taking in this waste.

In these circumstances, I do not believe there is any likelihood of any significant impact on human health. I do not believe that in these circumstances it is necessary to revisit the assessment performed for the original EIS. I also do not believe there is any merit in considering baseline or other health assessments. These are notoriously difficult to organise and give very little usable information. I do not know of any location where they have been performed on similar sites where information has been gathered which has been of any practical uses.

In summary I do not envisage Human Health effects from the changes proposed in the application.

Yours Sincerely,



Dr Martin Hogan FRCPI FFOMI

Consultant Occupational Physician (IMC No. 11908)