

Sub ① 2151

Meenaboll Environmental Protection Group

c/o Gerry Mulgrew, Secretary
Claggan
Church Hill
Co. Donegal

22 AUG 2005

July 28 2005

EPA Headquarters

P.O. Box 3000
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Co. Wexford

Ref #: EPA 215/1

**Submission - on the application, by Donegal County Council,
for a Waste Management Licence
to operate a Landfill at Meenaboll.**

Preamble

Over the past few years Donegal County Council have been under pressure to find new landfill sites. They have been forced to close all the illegal sites that they were operating (for which they had no licences), by Europe.

They then applied to the Environmental Protection Agency for an extension to the landfill at Ballynacarrick (Ballintra). This is now the only landfill site operating in Donegal. It has a limited lifespan.

The Waste Management Plan of 2000 identified Meenaboll as one of several possible landfill sites. It now looks like there are no other possible landfill sites being investigated. Meenaboll appears to be the only game in town.

Donegal County Council have been extremely remiss in taking a significant decision such as the imposition of a major landfill, which bears all the hallmarks of a SUPERDUMP in this area without properly consulting with those affected.

Despite our best efforts to discuss the problems that this landfill would cause, we feel that Donegal County Council, and their consultants have treated us with disdain.

Therefore we were forced to make an appeal/objection to An Bord Pleanala on the grounds that we consider the site to be unsafe from an environmental perspective.

This document is our submission/objection to the granting of a Waste Management Licence for the operation of the proposed landfill site at Meenaboll, Co. Donegal, also on the grounds that it would be unsafe from an environmental perspective.

Legend: DCC = Donegal County Council
 EIS = Environmental Impact Study
 CPO = Compulsory Purchase Order

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Our Primary Concern

Is that the proposed site is unsafe from an environmental perspective. It is located on the side of a mountain at an elevation of 800 to 1000 feet. The mountain slopes in two directions – one towards the River Finn and the other towards Gartan Lake.

We do not wish to see either of these important water sources polluted.

Site Selection

DCC have had a history of poor site selection for their 'dumps'. We are now paying for those mistakes with the pollution created and the imminent fines from Europe. For some reason DCC have insisted on locating sites near water sources (e.g. Drumnaboden on the River Leannan) and are doing the same again. The fact that three important water sources originate in this small area appears to have no significance with DCC or the consultants. This site was selected and then the EIS was prepared to justify the selection. There was no public consultation on this matter. It was a purely political decision. No voters reside in the specific townland of Meenaboll – Coillte had already seen to that by planting it with objectionable evergreens. Located exactly in the centre of Donegal it would make an ideal location for a SUPERDUMP – equidistant from all areas.

Consultation

Despite all the problems with lack of consultation on the failed Corravaddy site in 1999, Donegal County Council again failed to provide a meaningful consultation for Meenaboll. Repeated requests by the community for proper consultation, visits to other such facilities and funding to enable them to have a second opinion on the EIS produced for them by Kirk McClure Morton were ignored.

We do not consider the consultants, Kirk McClure Morton to be independent since they source much of their income from County Councils.

At all meetings of the community with the DCC officials and consultants the unanimous opinion was that the community felt that they were being treated with disdain and contempt.

The public 'show and tell' days arranged by the DCC were held after the selection of the site and after the preparation of the EIS. All decisions had already been made by this time and the glossy brochures were already printed. There was obviously no intention of making any changes.

We have repeatedly and publicly asked DCC for a 'free' copy of the EIS to allow us to engage our own experts to provide us with an independent assessment of the findings. DCC refused.

A County Councillor did try to arrange for the DCC officials and Elected Members to meet with us but the request was refused on the basis that we had objected and they (the DCC) would let it run its course.

Donegal Waste Management Plan 2000

One of the strongest opinions expressed during the public consultation for this plan was that reduce, recycle and compost should occur before any consideration be given to landfill. DCC have been utterly remiss in this respect. Even the limited 'Bring-Banks' have been a disaster. They are now under threat of closure.

The next strongest opinion expressed was that there would be a landfill in each electoral district and that waste produced should remain in the electoral district of creation. This would facilitate recycling at source and be a cleaner operation.

At the DCC meeting of 11th Feb 2002 where the implementation of the Waste Management Plan was discussed Cllr. D McHugh stated that he believed the burden of having a landfill in an area should be evenly distributed throughout the county, and that no one region should be overburdened, which Cllr. McHugh believed would be the case if these landfill sites are not advanced simultaneously.

None of the above has happened.

Donegal Draft Waste Management Plan 2005

It appears now that the four or five proposed landfill sites of the 2000 plan have disappeared and the numbers quoted are now two or four. Councillor Brian O'Domhnaill questioned this issue in the Council Chamber and he was unable to get any verification of how many landfill sites there will be.

We are reliably informed that the landfill site being investigated in Inishowen is now 'dead in the water'. It appears to many that no one is looking for any other possible landfill sites. That leaves Meenaboll as the only possibility and we are now back to a SUPERDUMP.

This is precisely what we said would happen two years ago and were laughed at by the DCC officials.

Waste Treatment Plant

The Letterkenny plant has been in the headlines for years for all the wrong reasons. The EPA water tests for 2000/2001 show almost 100% failure for all tests at standard readings and triple readings.

Regrettably the EPA readings for 2002/2003 are equally as bad with about a 98% failure rate. Please refer to your own website for these details.

The Letterkenny treatment plant was to be upgraded in 1999 as part of the Coravaddy Landfill opening. This never happened. Even today the DCC are still talking about the necessity of CPO's to do the upgrade. It appears that it will be years before the necessary upgrade occurs. In the meantime there would be nowhere to treat any leachate produced.

The Letterkenny treatment plant is now the subject of European scrutiny and probable significant fines.

The River Finn

In our opinion and the opinion of all who have visited the proposed site (including DCC) the River Finn will be polluted. The Sruhanpollandoo stream, which is an integral part of the proposed site can **'not'** be protected.

The Finn river is one of the finest salmon rivers in Europe and crosses the border into Northern Ireland.

Pollution of this wonderful asset would be a catastrophe and would cause an international incident. The resulting fines would be massive.

Drinking Water

Despite our excessive rainfall in Donegal we do have a serious drinking water problem. Nearly all private supplies are contaminated and soon permission to build may depend on a local safe water supply. We have that in Gartan Lake at the bottom of the hill between 800 feet and 1000 feet below the proposed landfill site.

There are significant flows of water rising in the area and all around the area, which flow directly into Gartan Lake. **Any** pollution of these water flows will create a disaster.

Add to this the fact that, in excavating the site, underground water flows may be altered and that any punctures/leaks of the landfill liner would allow leachate to flow in all directions and that any leachate overflow could end up in Gartan Lake. We are justifiably worried.

The poisoning of vermin at the site would result in the same vermin heading for the nearest water source to drink and die and float down into Gartan Lake.

The Seagulls who will flock to the site (along with the Crows) are known to carry the Salmonella disease. Their droppings and carcasses will also flow down the waterway to Gartan Lake.

There are a significant number of homes using the Gartan Lake Group Water Scheme and several other groups waiting to be connected up.

Precisely whom these Group Water Scheme users should sue in the event of pollution by the proposed landfill needs to be clarified prior to any licence being awarded.

Rainfall

The figures used in the EIS for the Meenaboll area are incorrect. The 1600mm per year that they quote is understated by up to forty per cent.

These are the recent Met Eireann rainfall figures (in mm).

1998	2047
1999	2125
2000	2129
2001	1634
2002	2145
2003	1636
2004	1911

The production of Leachate, and the dangers related to this, is directly proportional to the amount of rainfall so we must assume that the provisions made for the storage, treatment, transportation and disposal of this dangerous product are inadequate.

Furthermore this area is subject to extreme flash floods, which would also increase the dangers associated with the potential overflow of leachate.

Traffic/Transportation of Leachate

The road access to this site is very poor from all directions. The extreme bends would be a source of accidents for the increased 'heavy' traffic. The Rashedoge junction has been an accident black spot since its realignment a few years ago. Waste or Leachate spillages at any of these dangerous spots would not be welcome. All of this traffic would be passing Glenswilly National School, creating hazardous situations at opening, lunch and closing times.

Separation of Waste

It is proposed by DCC to separate waste prior to placing in the landfill site. We fail to see how this will be possible after the compactor in the vehicle has crushed it. The intention is to have the proposed site operated by a 'contractor'. Where will the necessary control of separation come from?

Leachate Collection System

The proposed system can clog up within a decade according to experts due to:

- silt or mud
- growth of micro organisms in the pipes
- chemical reactions leading to precipitation (deposits) of minerals in the pipes
- weakening of pipes by chemical attack
- crushing of pipes by weight of waste

Any clogging would result in overflows of leachate down the slopes to the nearby waterways.

Landfill Liner/Membrane

We question the safety of this method of containment and feel that there are too many unanswered questions regarding its reliability. The Internet abounds with horror stories of leakage and compound breakdown within a short period of time. Where this leakage would go at Meenaboll is ominous – either into the River Finn or into the drinking water supply of Gartan Lake.

Waste Tonnage

We feel that the tonnage of 24,000 is being understated. It is based on several other landfills being in operation. This will not be the case as Ballinacarrick is almost full and no other sites are being investigated. No account has been taken of all the organised illegally dumped waste and the illegal cross border movement of waste. Presuming an end to these activities this waste would now have to go to a 'legal' landfill.

Expansion

Considering the lack of interest by DCC in looking for any other landfill sites we anticipate that, if ever opened, Meenaboll would continue to expand in all directions. Such an expansion would certainly put all three water sources (Swilly, Finn and Gartan) in extreme danger. Given Coillte's penchant for selling land now instead of planting trees this is a definite probability.

Misleading Information by DCC

The public, and many councillors, feel that they were misled by the DCC about exactly which electoral areas would be contributing waste to the Meenaboll site. It originally was designated as a West Donegal landfill. Then it was to cover Milford and Glenties electoral districts. Then after the EIS was produced it was suddenly announced that the Letterkenny electoral district would also be using it. Now that the Inishowen possibility is gone and with Ballinacarrick nearly full I wonder what DCC will tell us next. Some Cllr's. have stated that they do not feel that they ever gave the go-ahead for the development of the Meenaboll site.

DCC Incompetence

Given all of the above it appears that there is a significant lack of competence within DCC to properly operate anything to do with waste management. Donegal have been receiving plaudits for their efforts to make 'decentralisation' of Local Government work. It is regrettable to see that an attempt is being made to 'centralise' waste. DCC lack an understanding of what '**real consultation**' is. Their unwillingness to tackle the problem at source is depressing. Their inability to see the job-creation possibilities in recycling and composting shows that just like so many other agencies they can't see the 'big picture'.

Yours Truly,

Gerry Mulgrew (Secretary)

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Ann Bosley

From: Wexford Receptionist
Sent: 22 August 2005 10:29
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22 AUG 2005

Subject: FW: Submission on Meenanoll Landfill - Donegal - Ref EPA215/1

Rec'd today at info Ann.

From: Meenaboll [mailto:meenaboll@eircom.net]
Sent: 21 August 2005 20:10
To: Web info mail
Subject: Submission on Meenanoll Landfill - Donegal - Ref EPA 215/1

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Thanks

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