

Objection to planning application of MEHL waste facility in North County Dublin for the treatment of ash, generated from waste and energy facilities.

Planning application number PL06F,PA0018

Introduction

It is estimated that for every three tonnes of waste that is incinerated, one tonne of ash is generated. This ash is toxic, containing concentrated amounts of heavy metals and dioxins which, when buried will eventually leach into the soil, potentially polluting groundwater. Very few jobs are created in return for the huge economic investment. Most of the jobs are temporary, created during the building of the plant. (Greenpeace international)

According to the EU commission: 'leaching from landfills may well be one of the most important sources of DIOXIN in the future'

Please note '**EC EDGES TOWARDS NEW DIOXIN LEGISLATION**' (Rory Harrington 18th Jan 2011) He says 'The European Commission has given its strongest signal yet that legislation tightening in the monitoring of dioxin in the food and feed chain will follow in the wake of the German crisis.'

John Dalli, EU health and consumer protection commissioner, said yesterday '**Brussels was considering all options 'including legislative ones' and that the crisis would be discussed at a meeting of the European Union agriculture heads on 24th January**'.

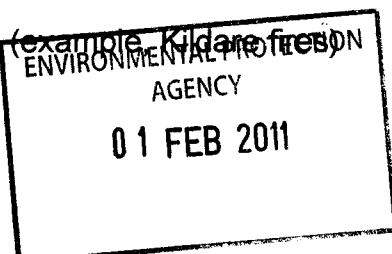
This crisis has been most costly and devastating in Germany.

In close proximity to the proposed MEHL waste facility are many farms which produce animal products and potatoes/vegetables for human consumption.

Any risk of increased levels of dioxins in these sensitive areas is risk too much. Prevention is better than cure.

I object to the above planning application for the following reasons: -

1. Site location
2. Environmental pollution and subsequent animal, feedstuff and water contamination in an area noted for its farming, horticulture and underground water. This is due to flaws in landfill liner technology, leaching etc.
3. Human health problems
4. Current ongoing problems caused by landfill flaws (example, Kildare fires)



Reasons for Objections

1.Site location

The site proposed is in a HIGH AMENITY area.

The proposed waste facility will require new structures such as the solidification plant and its associated silos. It has been specified that these will not be visible from outside the site. This is untrue.

These WILL be visible from outside the site due to land topography and will be clearly visible from the hill at Knockbrack 176metres OD.

2.Problems with landfill technology

Landfill liner failure and subsequent environmental pollution in this 'HA' area noted for its farming.

→ Even the EPA predicts failure of the new landfill technology
'..first, even the best liner and leachate collection systems will ultimately fail due to natural deterioration...' *federal registration p33345 Aug 30 1988*

→ 'Estimates of long-term compositional characteristics of leachates (*belevi & Baccini, 1989b; krug & Ham 1997; Kruempelbech & Ehrlig 199*) indicate that for some components, concentrations will not have fallen to compliance thresholds of EU water waste regulations for at least 100 years subsequent to landfill closure (*kruepelbech & Ehrlig, 1999*). However, landfill liner systems have only been in use for about 30 years so their long term performance is uncertain' *Alastair Allen, Dept of Geology, UCC*

Flaws in containment strategy at landfill sites Maher 1995 Allen 1998 1999

→ 'Leakage problems and major uncertainties as to the long term durability of artificial lining system'

→ 'Encapsulation of the waste by artificial lining/ capping system, no degradation of the waste, prolonged activity of the waste ,possibly for several decades or even centuries so increasing the potential for environmental pollution over the longer period and necessitates long term, post closure maintenance and monitoring of the landfill.

→ Clogging of leachate system

3. HUMAN HEALTH PROBLEMS

WHO report:-'with regard to waste landfills... the potential health implications cannot be dismissed'

Eurohazen group (vrijheid et al 2002) 'the investigators reported a higher risk of chromosomal anomalies in those who lived within 3kms of hazardous waste sites when compared to those in the study population who lived between 3 and 7 km from one of the study sites.'

'Elliot' study from the EIS from MEHL showed a 'higher rate for overall congenital abnormalities to those living within 2km of a hazardous waste site' MEHL state that this is 'less relevant to the hearing'. This does not appear to be less relevant to me. I am a veterinary surgeon therefore am accustomed to reading epidemiological studies and interpreting results. In my opinion MEHL waste facility are cavalier in their attitude to local people's health. They make sweeping statements and come to conclusions that have no foundation: - they state 'it is reasonable to *extrapolate* that the risk of cancer from living adjacent to a 'well operated' landfill will be *absolutely* minimal'. They extrapolate this from reports that show an *increased* risk of health issues in people living close to landfill site.

Contamination of water supply

There is a large underground water supply in the area also. This water supply is the biggest, cleanest food producing (horticultural industry) water supply in Ireland.

This water supply delivers water to the local area and to Balbriggan

4. HSE & EPA staff visit Kildare landfill fire

Updated: 22:38, Saturday, 29 January 2011

Health Service Executive and Environmental Protection Agency staff visited the site of a fire at an abandoned landfill in Co Kildare today.



- **Naas residents meet council over landfill fire**

Health Service Executive and Environmental Protection Agency staff visited the site of a fire at an abandoned landfill in Co Kildare today.

The blaze, at Kerdiffstown near Naas, has been burning for over a week and has forced some people to move out of their homes.

Residents met public agencies, including the HSE and the EPA, yesterday.

The HSE is advising people living near the fire to close windows and doors, and says those who experience health problems should see a doctor.

A **landfill fire** occurs when waste disposed of in a landfill ignites and spreads. In landfills that do not cover their waste with daily cover, biological decomposition creates substantial heat and can cause material in the landfills to spontaneously combust.

Landfill fires are especially dangerous as they can emit dangerous fumes from the combustion of the wide range of materials contained within the landfill. Subsurface landfill fires also, unlike a typical fire, cannot be put out with water.

Nearby streams can be threatened by leachate pools which may form if water is used to extinguish fires in landfills. There is also the danger that the landfill's membrane, a barrier placed under most modern landfills to prevent contamination of the underlying ground, will be destroyed or penetrated by the fire itself. Normally this liner prevents harmful liquids contained within the landfill from escaping into the groundwater and nearby streams. Destruction of the liner therefore leads to **serious environmental problems**.

Notable landfill fires

- On January 26, 1998, in Maalaea, Hawaii, a fire 15 to 20 feet underground. The fire was eventually deemed to be extinguished in a matter of weeks, with injections of more than 1,000 pounds of liquid carbon dioxide. It continued to smoulder for 4 months.^[2]
- An underground landfill fire that was discovered in December 1996 in Danbury, Connecticut caused a strong odor like rotten eggs due to the high concentration of hydrogen sulfide. The fire lasted for weeks and the town was forced to install a gas recovery system, the cost of which exceeded \$1 million.^[3]
- In early November 1999, at the Delta Shake and Shingle Landfill in North Delta, British Columbia, the fire burned between 20 and 30 metres (about 100 feet) deep. On November 27, Delta's Mayor declared a state of local emergency. Extinguishing the fire took slightly more than two months and cost more than \$4 million (Canadian).^[4]
- On September 2, 2007 a large fire at the Fredericton Regional Landfill forced residents to stay indoors because of fears the smoke could be toxic
- **References**

^ "Ma'alaea Landfill Fire Sparks State Effort To Develop Guidelines," Environment Hawai'i, Inc., Volume 9, Number 4, October 1998.

^ U.S. Fire Administration - Landfill Fires

^ T. Sperling, "Fighting a Landfill Fire", Waste Age magazine, Jan. 1, 2001

Summary

The potential for human health problems, environmental pollution and water contamination is too high.

I also believe that this waste facility has not being designed to the highest possible safety standards. I believe that higher standards are to be found in the waste facilities in Europe (eg. where they are completely covered). I believe that this deficit would give rise to serious, righteous public concern and subsequent financial loss should it come to light.

I request a public oral hearing

Jacqueline Yeomans, M.V.B.

30th January 2011

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