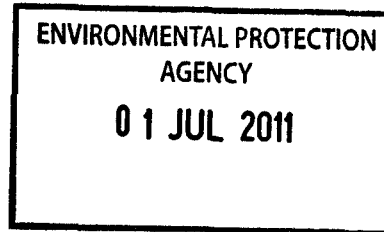


Submission WO129-03.

Sub. NO 12



**Nevitt  
Lusk  
Co. Dublin  
22/6/11**

**Dear Mr. Meaney**

**We would like to make an observation in relation to the proposed Hazardous Waste facility at Hollywood, Nags Head , Naul , Co. Dublin , ref WO129-03.**

**The Bord Pleanála BP inspector is Paul Caprani. Six Board members voted, four members for and two against this project.**

**The BP Inspectors report shows the underlying aquifer has a high transmissivity of up to 300 meters per day [ as confirmed by the pump tests ] . Groundwater in North of site is flowing in a North/Easterly direction towards Balbriggan public water supply. In the South of the site , the groundwater is flowing South/East direction towards commercial wells. Either way , we are dealing with a water supply for drinking and food production for human consumption.**

**The inspector is showing a water divide to the North of the Site but remember water divides move as confirmed by Fingal County Council FCC, etc . The site is more complicated from a hydro geological point of view because of fault lines, the presence of shale and fault lines going through shale.**

**The inspector admits the commercial wells may lie in the pathway of the groundwater flows beneath the site. The quantitative risk assessment acknowledges that where there is a significant leak in the liner, a number of pollutants would exceed drinking water standards. Remember water that is used for the processing of food is classified as water for human consumption [ Drinking Water Regulations 2007]. These commercial wells are protected by law.**

**There is a commercial well [ Mr. Moore, also another Mr. Moore in the Nevitt ] less than 100m [ yes 100m] from the proposed landfill site. They use the groundwater for processing of food for human consumption. It is a pity the inspector did not visit these premises.**

**There is no 3 meters of low permeability sub soil as required by the GSI groundwater protection response for landfills. The inspector states [ p59] “ the weathered shale APPEARS to have low permeability “ . Fingal County Council [ 7.5.9] shows the shale has a higher permeability than that presented in the model. The inspector decides to substitute the shale for the low permeability sub soil.  
Is this some sort of a joke?.**

**The inspector states [ p59] “ the site does not have the natural Geological or hydro geological protection in relation to render it suitable for a landfill “ he then argues for artificial protection. A fault line goes through the shale from the public water supply to the proposed**

**site . The applicant admits “ that it has not prevented the groundwater movements across the fault “ [ p62 ]. At this stage alarm bells should be going off in Bord pleanála ???.**

**In the case where there is a significant breach in the lining system, the results indicate that hazardous substances would enter the groundwater beneath the site or concentrations exceeding drinking water standards [ 7.5.9 p66 ] . Quote “ would only be 3-4 times the drinking water standard “.**

**We cannot believe what we are reading ?.**

**The pump tests in Hollywood and the nearest commercial well [ less than 100 meters ] prove this small area can supply 8,000 people approximately with clean fresh water every day [ 220 litres per day per person ]. This can supply the people of the Naul and surrounding areas with water. Remember the Naul water reservoir is on Hollywood hill.**

**The pump tests prove, in the Nevitt and the commercial wells along the major N/S fault line can supply water for 23,000 people approximately. The Nevitt and Hollywood are only 40 seconds drive apart. We are not counting the artesian wells in the Nevitt where the water is actually flowing out of these wells [ photographic and video evidence sent to European Commission water protection department ). The Geological Survey of Ireland have stated there is**

**potential for to extend the public water supply along the major fault line extending into the Nevitt. The bog of ring public water supply is supplying water for approximately 20,000 people. The commercial wells are producing huge amounts of water [ 1 million litres per well per day is not uncommon ]. Actually one commercial well is producing 2 million litres per day [ Mr Bergin ]. There is over 120 commercial wells in the aquifer/ water supply. We are looking at an area [ Hollywood, bog of the ring and the Nevitt ] that can supply 51000 people with clean fresh water every day. This working water supply has already proven itself , the public water supply for over 10 years and the Horticultural industry for over 100 years [ artesian wells ] . In other words this water supply is sustainable. The bottom line, we are looking at an area that can supply fresh potable water for 51000 people every day.**

**The water reservoir on Hollywood hill should be made bigger and supplied by the water underneath and from the Nevitt. The water can be then be gravity fed to the Bog of the Ring water treatment plant [ a few kilometers away ] . This would be to Fingal economic advantage . Remember WATER IS WORTH MONEY but more importantly humans cannot live without water. All water reservoirs in the Dublin area are all dangerously low.**

**Let us be clear**

**The Inspector and four members of BP have decided to put a hazardous landfill in the center of a working water supply.**

**1 The European Commission told the Irish government to register this area as a drinking water area , as confirmed by EC letter given to inspector at Oral hearing.**

**2 Beside Balbriggan public water supply and FCC were concerned it would be contaminated.**

**Remember Galways , Ennis , Cork etc water supplies contaminated. A possible situation ,what would happen if Dublin's water supply was contaminated?. At least they have a water supply in Fingal but wait that is contaminated, the horticultural industry destroyed [ remember Germany/Spain recently] because certain civil servants put 2 landfills in it.**

**3 In the middle of the biggest cleanest food producing water supply in Ireland.**

**The inspector substitute shale for low permeability subsoil. He ignores a protected by law commercial well less than 100 meters away from the proposed site. The proposed liners do not strictly adhere to the design specification set out in the EPA documentation [ 7.7.1]. Quote " Ultimately all linings associated with landfills will fail " 7.7.2 . The inspector admits the site does not have any natural Geological or hydro geological protection.**

**Do you people care about water supplies/ resources?.  
Is it a case of let get a hazardous landfill as quickly as possible and let other people clean up the mess?.**

**We are sending over more detailed documentation to the European Commission Water Protection Department. We are demanding a full scale investigation from the European Commission.**

**There is also the matter of split decisions being made by the EPA and Bord Pleanála. The European Commission is saying that it is illegal [ breach of EIA Directive March 2011 ] . They say there should be only one organization making decisions on large projects and of course the civil servants take full responsibility for there reports / decisions .**

**The Secretary  
Nevitt Lusk Action Group**

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