

SUB No. 46

Hands Lane
Rush
Co Dublin
18/8/2011



Mr B. Meeney, EPA Inspector
Johnstown Castle Estate
Co Wexford

Ref. WO129-03 Hazardous Waste Landfill for MEHL, Naul, Co Dublin

Dear Mr Meeney,

I spoke with Mr. Doheny, the EPA inspector involved with the incidents of windblown ash at Moneypoint power station who kindly forwarded a copy of his report. Whilst there are some similarities with the proposed MEHL site there are some significant differences

- The ESB site is a saline marsh on the Shannon Estuary shoreline, therefore the issue of the destruction of potable groundwater cannot arise and there was no need for a landfill liner.
- As a result the destruction of a liner by overheating as in the case of the MEHL site does not arise at Moneypoint and the ash could in theory be bulk land-filled without curing by surface exposure.
- However it appears from examination of the ESB site on Google earth that the ash is tipped initially in individual truckloads and exposed for curing before final landfill in bulk.
- The explanation may well be that ash is periodically removed for recycling in a concrete plant at Limerick, and as such would not be suitable in an uncured condition.
- As a result, the exposed fresh ash undergoing the approximate 10 week curing process must be kept in a dampened down condition at all times.
- It is notable that the failure to apply water for one day in dry windy conditions was enough to give rise to an extensive windblown ash cloud.
- The Clare Champion newspaper reported ash deposits extending to Killimer church which is some one kilometre distance. This was confirmed by Mr Doheny who also confirmed that such incidents had happened on a number of occasions. MEHL is a hilltop site!

I do not wish to be difficult but we find ourselves in the situation that the applicants, both in the case of the Nevitt landfill, and now MEHL failed to address this very real problem.

Yours truly,  Patrick Boyle, BE