



**Knightstown  
Lusk  
Co. Dublin  
28/9/2011**

**Mr. B. Meeney, EPA Inspector  
Johnstown Castle Estate  
C. Wexford  
Ref. Proposed hazardous waste landfill for MEHL, at Naul, Co.  
Dublin WO129-03**

**Dear Mr. Meeney,**

**Our family have just drilled a new groundwater well to service two houses in the town land of Knightstown, South / East of the proposed MEHL site [ approx. 2 km ] . Group water schemes are independent owned consisting of two or more houses and are a means of supplying piped water. We will be classified as a small group water scheme . Public water supplies , group water schemes , Commercial wells and some private wells are protected, specifically 2007 Drinking Water No2 Regulations 278/2007, Water Framework Directive [ transposed into Irish Law in 2003 and it aims to protect and improve water resources and aquatic ecosystems], SI 9 Groundwater Regulations 2010 and other laws.**

**We note the groundwater flows in a S/E direction from the MEHL site which will put this new small group water scheme supplying water for human consumption, directly in its path. Source Protection Zones are protected.**

**The standard of drinking water in Ireland takes into account issues like :**

**Safety [ chemical standards, microbiological standards, turbidity paramatic values etc].**

**Security [ assessment of risk, monitoring of the risk , management of the supply].**

The Company we got to drill this well was Kings well drillers. They estimate the well will produce approx. 200,000 litres per day . They also noticed the bedrock was highly fractured. This is a good sign for finding water because water can flow through these cracks. They also noticed there was no resistance in the last few metres. They have drilled approx. 47 metres , depth to bedrock is 24 metres and 23 metres into the highly fissured bedrock. Can you, Mr Meeney or anybody guarantee our family that this small group water scheme that is protected , will not be contaminated at this depth ?.

We want to put on record now, that my sister is already bottling water and we like the opportunity in the future to do the same at Knightstown. The EPA should not prevent our family in any way from bottling this water in the future, in decisions that you may make now. There are stringent standards for bottling water and this aquifer has already proven itself. Bog of the Ring public water supply , the commercial wells and now a small group water scheme. In most cases the commercial wells are tested to the European Standard SI 278 to ensure water is safe to use in food production. Group water schemes etc. has to comply with EU/ National drinking water quality standards.

Water that is used for the processing of food is classified as water for human consumption 2007 Drinking Water Regulations . If our small group water scheme is polluted , we can prosecute under the Water pollution Act 1990 and other laws. Obviously , the Health Service Executive, FCC, EPA etc. will have to be brought in. What would happen if the Bog of the Ring public water supply was contaminated ? . Would the European Commission get involved ? , after all they did tell the Irish Government to register this area as a protected area under article 6 of the Water Framework Directive . This of course means that this groundwater body is protected. The EC have a huge amount of information in relation to this water supply /resource.

We are now very much aware of the potential of this clean water resource that is flowing under our land. I would like to put on record that our sons could also process food in the future using this groundwater. Again , this would make this water supply/resource protected. As a matter of fact, King and other well drillers have drilled a lot of wells in the past and especially now they are drilling wells in this aquifer. The point is , a lot of people now realize how valuable this water resource is and also realize the potential of this water resource .

Let us all be clear in relation to MEHL site and the Nevitt site for proposed landfills.

To the North [ approx. ] , there is a public water supply and Fingal County Council FCC are concerned about possible contamination of this water supply. There is also a commercial well N/W of MEHL which they use the groundwater for processing of food for human consumption [ Mr. Moore ]. There ZOC is protected.

To the south [ approx. ], there is a small group water scheme , that is protected . There is also a commercial well that is being used for processing of food for human consumption [ Kerrigans ].

To the West [ approx ] of MEHL , there is a farmer that is supplying groundwater to cows in the production of milk for human consumption [Kennedys ].

To the East [ approx.] there are two immediate commercial wells [ Thorns and Moores] which they process food using groundwater. Some of the food is then delivered to hospitals and in some cases uncooked like salads etc. There ZOC [ Zone of contribution] are also protected.

There is also the issue of the water resource in the Nevitt. This area could supply 15,000 people approx. with water [ as confirmed by pump tests, artesian wells etc] . I also note two EPA inspectors and

one Trinity College consultant recommended a landfill should not go in the Nevitt. Geological Survey of Ireland showed there is potential to extend the Bog of the Ring public water supply south along the major N/S fault line which goes through the Nevitt. How dare the EPA sacrifice this water supply/ resource. The Bog of the Ring is supplying water for approx. 17,500 people. The pump tests in Hollywood and the commercial well [ also other wells ] can supply water for 6500 people approx.

Of course , if you take a wider ring in distance around MEHL and the Nevitt , there are lots more high yielding commercial wells like Country Crest [ 2 million litres per day, employing 100 people approx. ] . Landys and the list goes on. All these processors depend on clean groundwater for there businesses.

We are looking at an area that can supply water for approx. 40,000 people. Also for example ,you could add in Kerrigans well which could supply water for another 5000 people. You could add in Thorns well that can supply water for another 3700 people, Moores 3500 people, you could add in Country Crest that can supply water for another 10,000 people, Bergins 8500 people and the list goes on and on. Our well approx. 1000 people [ 200 litres per person per day ]with the space to drill more wells. Note, these businesses can produce this amount of water per day but in most cases is using only a small proportion of this water per day. I want to be conservative so we will leave most of above wells out and stick to four areas.

What has the Nevitt , Bog of the Ring , Hollywood got in common, now Knightstown ? . Lots of clean groundwater that can supply water for approx. 40,000 people every day.

Can anybody, including Mr. Meeney, individuals on EPA Board give our family and everybody else concerned, a written guarantee that the Bog of Ring public water supply, our small group water

scheme , commercial wells in the process of either food or milk production will not be contaminated and if it is, you will pay proper compensation to everybody effected. The small Corduff river [ also contains groundwater] that is used for surface irrigation of crops for human consumption also ,will not be contaminated?. Obviously , the written guarantee will have no escape clauses .Of course , another question needs to be answered . What gives you Mr. Meeney or individuals on the EPA Board the right to sterilize [put beyond use] this water resource.

Would you agree, if the two landfills went ahead , and when the contamination starts over time, it will cost approx, 75 Million Euros to get back to where we are now [ repeat, to get back to where we are now]. EPA and Bord Pleanála admits all landfill liners eventually fail and of course many examples to back up this statement. Obviously, the two point sources of contamination [ ie. Landfills ] will have to be removed, possible compensation paid to commercial well owners, possible compensation paid to the people of Balbriggan town including businesses , possible compensation paid to people eating contaminated food around Ireland, possible compensation paid to people drinking contaminated milk around Ireland, possible health issues etc.etc. etc.. Where would it end?.

What do you think the figure could be, up or down?. Either way, it would cost a lot of money. The point is , EPA and Bord Pleanála [ all names recorded] were given all this information in advance.

I would like to make a small comment in relation to the Bord Pleanála Inspector Report. In relation to the GSI groundwater protection response for landfills, he tries to substitute higher permeability shale [as confirmed by FCC] for low permeability subsoil. Why would a Bord Pleanála inspector attempt such a thing ?. The inspector states “ the site does not have the natural geological or hydro geological protection in relation to render it

suitable for a landfill". He also shows the site contravenes the zoning objective for high amenity areas set out in the recently adopted Fingal County Development Plan 2011-2017. The objective DW06 , is to protect the drinking water supply against contamination and in Ch. 4 natural resources are developed in a sustainable way. He also shows the proposed liners do not strictly adhere to the design specification set out in the EPA Documentation. The underlying aquifer has a high transmissivity of 300 metres per day [ contamination will spread very quickly]. FCC puts in a submission about possible contamination to nearby public water supply. The Inspector admits all landfill liners eventually fail. He then recommends to put a hazardous landfill into this ?????. Surely, The hard evidence above would suggest the complete opposite. I note two BP Board members voted against this project. Would you all agree, this is an example of where the disconnect is between Bord pleanála and the EPA. The EPA and Bord Pleanála should be closed down to comply with the EIA Directive and one organization set up in its place.. I believe the European Commission [split decisions March 2011 ] have said some of your decisions are now illegal.

This is the biggest cleanest food producing aquifer in Ireland [ lots of processors of food for human consumption north /south/east/west]. This aquifer also supplies a small public water supply [ in the north] , now a small group water scheme [ in the south ], groundwater milk production in the West Kennedys , East Mournes and in the middle of all this two possible landfills [ hazardous and non hazardous ]. What about the water resource that is sacrificed?

Is this some sort of a joke?.

Section 21 A4 requires that the Minister, the Agency and the local Authorities shall take into account the general environmental protection principles of precaution and sustainability, technical feasibility, and economic viability, protection of resources as well

as the overall environmental human health, economic and social impacts, in accordance with Article 1 of the Waste Directive and section 32 [ 1].

I also note that the crew of Murphy's are very good and decent people.

The bottom line Mr. Meeney and individuals on EPA Board , a clean water , milk , food supply or two landfills?.

I would like to remind , everybody , in relation to Bord Pleanála mission statement and one objective is the proper planning and Sustainable Development of the area concerned . Under the Planning and Development [Strategic Infrastructure ] Act 2006 , the proper planning and Sustainable Development or the effects on the environment must be applied to all Strategic In fracture Projects. Did Mr Caprini and four members of Bord Pleanála take into account properly, the effects on the Environment especially the possible contamination [ as confirmed by FCC] of the nearby public water supply etc., of this project under this Act?.

I would like also to remind everybody, the EPA mission statement; to protect and improve the natural environment for present and future generations, taking in to account the environmental, social and economic principles of sustainable development.


What is sustainable development?.

Economy and society in Ireland can develop to there full potential within a well protected environment, without compromising the quality of that environment and with responsibility towards present and future generations and the wider international community [ Department of Environment 1997].

Bord Pleanála is only 34 years old , this water supply/resource can be traced back 150 years in relation to the Horticulture Industry [ artesian conditions]. The public water supply is approx. 10 years old. Our small group water scheme has only started its life. This aquifer will deliver clean water for hundreds of years long after we are all dead providing a few civil servants wake up.

Would you all agree, nobody in the EPA or Bord Pleanála has the right to sacrifice a perfectly good water supply / resource . Who would use water that flows underneath two possible hazardous/nonhazardous landfills ? As a matter of fact , you are required by law to protect our resources under section 21 A4, Article 1 Waste Directive, Section 32 [1] and of course the Water Framework Directive.

C.C. European Commission Water Protection Department  
European Commission legal department  
[EIA directive split decisions].

  
Declan White  
BSc [Hons] BSc [ Open]