

**Josephine Kennedy**

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**Subject:** FW: Unlined HAZARDOUS WASTE H2 Pit - Seveso Protected Zone, Hoffmann la Roche  
**Importance:** High

-----Original Message-----

From: [omahonyroger@eircom.net](mailto:omahonyroger@eircom.net) [mailto:[omahonyroger@eircom.net](mailto:omahonyroger@eircom.net)]  
Sent: 04 January 2012 15:33  
To: Ann Kehoe  
Cc: Laura Burke; Ann Marie Donlon; Tom Coughlan  
Subject: Unlined HAZARDOUS WASTE H2 Pit - Seveso Protected Zone, Hoffmann la Roche

Attn: Ms Ann Kehoe, Office of the Environmental Protection Agency  
  
copy : Ms Laura Burke Director General, Environmental Protection Agency  
  
copy: Ms Ann Marie Donlon Inspector ,Environmental Protection Agency  
  
copy : Mr Tom Coughlan, Clare County Manager

Dear Ms. Kehoe,

Thank you for your response. HAZARDOUS WASTE buried in unlined pits H2 and others, found within a Seveso protected zone and in clear contravention of EU Seveso legislation, the applicants licence conditions and local authority planning permission, exists.

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Ms Burke has been actioned to carry out specific tasks on behalf of the Agency in relation to the extraction and incineration of some HAZARDOUS WASTE out of the Seveso protected zone (letter 23 November 2011 to Ms Burke).

Attempts appear to have been made to cover up this unlined HAZARDOUS WASTE in a process which appears loosely defined as a remediation capping process. EU Seveso legislation is specific, no HAZARDOUS WASTE can exist in unlined pits within a Seveso protected zone.

Notwithstanding the HAZARDOUS WASTE extraction and removal ,Hoffmann la Roche own consultants URS (45078361)state the following in relation to capping the H2 hazardous waste pit :

"Capping of the H2 area to reduce rainfall infiltration is considered to be of limited benefit, as the chemical/process waste in some areas is emplaced below the water table and there is through flow of shallow groundwater through the waste, driven by natural gradients due to the hillside to the west of the H2 area. Capping would require considerable engineering works to profile the H2 area to promote runoff and manage the drainage, but would not eliminate the release of leachate to groundwater. In addition the presence of a landfill cap would restrict the future use of the H2 area and despite the capital investment , would not provide Roche with a reduction of liability in the event of an unforeseen future incident".

"Solutions involving leaving the waste in place will likely require undefined long term monitoring and operational costs for decades, while not eliminating the possibility of future incidents which may prompt a regulatory rethink"

Ms Donlon should be aware that the European Commission has elevated the matter to EU Pilot status.

I would be grateful to Ms. Donlon as inspector to the Hoffman la Roche IPPC licence review , to acknowledge this communication, a copy of which is to be forwarded to the European Commission.

Sincerely

Roger O'Mahony  
Kilshannig House  
Cratloe Wood  
Cratloe  
Co. Clare

t: 086-8597277

m: [omahonyroger@eircom.net](mailto:omahonyroger@eircom.net)

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