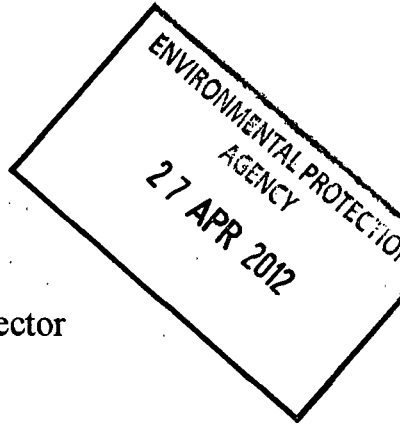Hands Lane
Rush Co Dublin
26th April 2012

Mr Brian Meaney, Inspector
Waste Licensing
EPA
Johnstown Castle Estate
Co Wexford

MEHL application ref WO 129-03

Dear Mr Meaney,

Ref. EPA Article 16 request to MEHL for further information dated 23 March, could you kindly bring the following concerns of local residents in relation to Paras 5.3 to 5.8 of the Article 16 notification to the attention of the Hydrogeologist Consultant engaged by the EPA to assist with this application. We refer specifically to the situation which will arise at some time in the future after closure of the facility, and all pumps are switched off in the Hazardous Waste cell.

- We quote the reference from the MEHL Hydrogeological Risk Assessment which you refer to - "leachate head will rise resulting in increased leakage". Regardless of the generating potential of the contents of the cell the head will rise due to recharge by rainwater.
- Since the DAC liner is designed to prevent leakage of all liquids contained within the cell, then the saturated level of the cell will eventually reach the cell rim and begin to spill over into the surrounding environment.
- This spillage will in time **inevitably** occur should the DAC liner remain intact, and will pollute **surface water**.
- Alternatively should the DAC liner fail, then "increased leakage" will occur as described by the applicant, polluting **groundwater**.
- In either scenario pollution of the environment <u>by leakage or spillage</u> of the contents of the hazardous cell is inevitable.
- The question of acceptable level of pollutant concentration in surface and/or groundwater beyond the boundaries of the site then arises.
- The escaping pollutant concentration emanating from the fly ash encased in concrete may prove to be safe, but the concentrations of rainwater-generated leachate emanating from the non-encased hazardous waste proposed for this cell is entirely unknown.

The NLAG therefore request that only **inert** non-encased waste be licensed.

Yours truly, _____ Patrick Boyle, BE, for NLAG