

Noeleen Keavey

Subject: FW: Hazardous waste landfill for MEHL at Hollywood, Naul, Co Dublin ref WO129-03

From: Paddy Boyle [mailto:paddyboylrush@hotmail.com]
Sent: 17 May 2012 08:36
To: Wexford Receptionist
Subject: FW: Hazardous waste landfill for MEHL at Hollywood, Naul, Co Dublin ref WO129-03

Dear sirs,
Please accept amended submission below which has been corrected for typing errors.
P.Boyle

From: paddyboylrush@hotmail.com
To: info@epa.ie
Subject: Hazardous waste landfill for MEHL at Hollywood, Naul, Co Dublin ref WO129-03
Date: Wed, 16 May 2012 09:13:08 +0100

From:
Patrick Boyle, NLAG,
Hands Lane
Rush
Co Dublin
15//2012

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

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Dear Mr Meaney,
I refer to the above MEHL application and my submission no 65 dated 26 April 2012, in which I raised the question of the disposal of leachate from hazardous and non-hazardous cells containing principally chemicals emanating from incinerator ash originating at the Poolbeg (proposed) and Duleek (operating) facilities, totalling some 250,000 tons of ash per annum. In particular I raised the question of the operation of the leachate drainage system after future closure of the facility and all pumps were switched off - in particular how was the rising head of leachate due to rainwater ingress to be controlled and disposed of.

At a meeting of Fingal County Council yesterday evening Monday 14th May, 2012 it became public knowledge how his technical problem was to be solved. The final three remaining options for the location of the sewage treatment plants for the Greater Dublin Drainage Scheme were announced i.e. Newtowncorduff, Annsbrook and Clonsaugh. It comes as no surprise to the Nevitt Lusk Action Group that the first two site options are conveniently located adjacent to, and down gradient of, the abandoned Nevitt site and the currently proposed MEHL site. Were the private company to obtain permission to discharge leachate into a public sewage plant at either of these first two mentioned locations then the problem of leachate disposal would be solved and passed on to the taxpayer.

I would now like to raise the following points with the EPA in relation to this matter.

- Currently Dublin City Council has not obtained planning permission nor an EPA license for the disposal of ash from the Poolbeg incinerator other than by exporting the material abroad -see Poolbeg EIS.
- The MEHL EIS does not mention the fact that the cost of the infrastructure needed to dispose of their leachate is to be borne by the taxpayer.
- The MEHL EIS nor the Poolbeg EIS does not mention the fact that the only possible rationale for the location of the sewage treatment plants at a remote site in North Fingal is to facilitate the disposal of incinerator ash for a private company.

- The MEHL EIS does not contain an Environmental Liability Risk Assessment (ELRA) which takes into account the cost to the public of providing a convenient sewage treatment plant capable of handling hazardous landfill leachate from the MEHL site.
- The MEHL EIS does not contain any details as to the proposed route of the necessary pipeline connecting the MEHL site with the sewage plant, who will construct this pipeline, and who will bear the cost, and where is the planning permission for such a development. The current EIS is therefore incomplete and defective on this most serious and essential element.
- Is the "drip-feeding" of essential elements of an EIS from separate quarters, after planning permission has been granted, acceptable practice to the EPA, and does it comply with the the EIA Directive and national legislation?
- No details are provided either in the Poolbeg or MEHL EIA process as to the construction details or cost of providing this major diversion of the sewage pipeline plus treatment plant for toxic ash leachate from the shorter Clonsaugh site to the north of the county, but it would be fair to say that it might be comparable to the cost of the new National Childrens Hospital, i.e. approx 500 Million Euro.
- And finally the NLAG would request the EPA as the technical experts and authorities in these matters to bring this very important issue to the attention of the Government, whom we feel sure are not aware of the additional financial implications of what is proposed, or the extent of the reliance of this private venture on the technical and/or financial cooperation and assistance of the four Greater Dublin Councils, the Department of Finance, an Bord Pleanála and the EPA in the disposal of toxic leachate..

Yours truly,
For the Nevitt Lusk Action Group.
Patrick Boyle, BE

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