

Sub. No. 68

Noeleen Keavey

Subject: FW: Proposed MEHL hazardous waste landfill at Hollywood, Naul, Co Dublin

From: Paddy Boyle [mailto:paddyboylrush@hotmail.com]
Sent: 06 June 2012 15:47
To: Noeleen Keavey
Subject: RE: Proposed MEHL hazardous waste landfill at Hollywood, Naul, Co Dublin

Dear Ms Keavey,
I wish to confirm that the Email below be treated as a submission on WO 129-03
P.Boyle

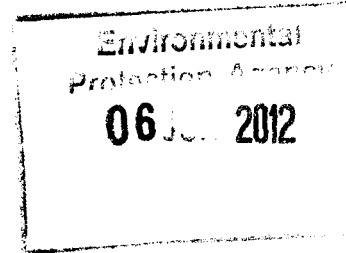
From: n.keavey@epa.ie
To: paddyboylrush@hotmail.com
Date: Wed, 6 Jun 2012 15:06:32 +0100
Subject: FW: Proposed MEHL hazardous waste landfill at Hollywood, Naul, Co Dublin


Dear Mr Boyle

Please confirm if you wish to have your email below treated as a submission on waste licence application W0129-03
?

Kind Regards

Noeleen Keavey
Office of Climate, Licensing & Resource Use
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Wexford
Tel: +353 53 9160600
Email: licensing@epa.ie



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From: Paddy Boyle [mailto:paddyboylrush@hotmail.com]
Sent: 06 June 2012 08:03
To: info@greaterdublindrainage.ie; Wexford Receptionist
Subject: Proposed MEHL hazardous waste landfill at Hollywood, Naul, Co Dublin

Attention : Mr Peter O'Reilly, Project Manager, Greater Dublin Drainage Scheme, Fingal County Council.
Copy : Mr Brian Meaney, EPA inspector, ref. MEHL waste license application WO 129-03

Dear Mr O'Reilly,

I refer to our detailed conversation on Saturday last in relation to the proximity of the Annsbrook/ Newtowncorduff sites to the proposed hazardous waste landfill for Murphy Environmental Hollywood Ltd (MEHL), which has been granted planning permission by An Bord Pleanála and is presently undergoing a Licensing Application process with the EPA, Ref WO 129-03.

Residents of the area adjacent to the landfill have expressed their concerns in relation to the MEHL development, as has the Nevitt Lusk Action Group - a group of residents initially formed to object to the Nevitt Superdump.

We believe that the location of a waste water treatment plant at the two above mentioned sites would facilitate the

location of the MEHL proposal both during operation but more especially after closure, and would therefore be opposed to these locations on those grounds. We also cannot see the rationale for the enormous public expenditure involved in the excursion of the Greater Dublin Drainage scheme into north Fingal except perhaps to facilitate the MEHL project in the disposal of leachate.. This could not happen of course without significant investment by the public in specialist leachate treatment equipment, such as reverse osmosis, which would have to be maintained by the state ad infinitum because of the hazardous nature and extended lifetime of leachate generation at the MEHL facility.

As I have indicated to you the main component of material proposed for acceptance at the MEHL site is incinerator ash initially from Duleek and Poolbeg, both hazardous and non-hazardous, but it also includes hazardous waste of unknown quantity, composition and origin.

During the operational period of the landfill it is proposed to dispose of excess leachate from the non-hazardous cells -bottom ash- by tankering to an EPA licensed waste water treatment plant. This leachate can contain high levels of heavy metals and is also suspected of being ecotoxic and referred to as such by the previous Minister.

It is not expected to generate excess hazardous leachate during the operational phase as the this liquid will be recycled for use in manufacturing concrete blocks encasing the hazardous fly-ash.(Note - leachate is generated by rainfall and dust control spraying).

There is no after closure plan(CRAMP) outlined in the EIS. However as there is no natural outlet for leachate proposed in the EIS, the NLAG must assume that the longterm intention is to construct a gravity driven system to the public treatment plant at Annsbrook/Newtowncorduff as the only possible solution. The public facility would then be expected to dispose of hazardous and non-hazardous leachate, if that were at all technically possible, or financially practical.

Under the circumstances you will forgive us if we come to the inevitable conclusion that the proposed MEHL EIS is deficient in essential detail, and in its present form represents a real threat to the environment and a possible insurmountable technical problem for Fingal County Council's waste water treatment capability in the long term.

We would appreciate if you would communicate with the EPA on the matter as part of your deliberations. Mr. Brian Meaney is the inspector dealing with the MEHL application at the EPA. We will copy this letter to him.

Thanking you for your attention.

Yours truly,
Patrick Boyle, BE
Hands Lane,
Rush,
Co Dublin

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