

Joe Reilly

Subject: FW: MEHL Environmental Liability

From: Paddy Boyle [mailto:paddyboylrush@hotmail.com]

Sent: 09 August 2012 10:33

To: Wexford Receptionist

Subject: MEHL Environmental Liability

To; Mr Frank Clinton
Copy; Mr Brian Meeney

REF; MEHL Application WO 129-03

Dear Sirs,

May I take this opportunity to apologize for incorrect Ref Numbers on my Emails referenced WO127-03 dated 7th and 8th August. They should of course have read WO 129-03. Please make the relevant corrections to the documents concerned.

Long-term Environmental Risk to Groundwater associated with Bottom Ash disposal at MEHL

It is clear from reading Dr Baumanns report on trials conducted by him in Germany that under certain conditions failure of the liner and underlying clay barrier may occur due to overheating resulting in escape of leachate to groundwater. Recent unconfirmed anecdotal reports from the Whiteriver landfill, Co Louth, are indicating that such overheating problems may have occurred there. We would request that you investigate this particular matter in relation to its relevance to this application, particularly as we are given to believe from local newspaper reports that the operation there is under EPA supervision.

Long and Short-term Risks associated with windblown ash

Dr Baumann also recommends that bottom ash should not be covered until well after final closure of the landfill. At MEHL-a hilltop site with adjacent residences- this gives rise to the further risk of windblown ash. Furthermore the refusal of Indaver to pre-cure the ash prior to delivery, as recommended by Dr Baumann gives rise to the risk of injury to the public from the highly caustic nature of raw untreated ash, as I have outlined in my submission dated 7th August.

Long term Environmental Risk to Groundwater associated with the structural failure of the DAC liner due to the possible presence of Pyrite

We note that even though it is the responsibility of the EPA to ensure that an Environmental Liability Risk Assessment is carried out no request has been sent to the applicant to provide assurance that the pyrite levels at the site are below safe levels or to provide a Geotechnical Engineers report on the likely effects of pyrite levels at the site on the future stability of the DAC liner.

We note in this regard

- Mapping of Pyrite containing rock in Fingal by the recent Pyrite Board Report to the Minister shows the area to be within the Pyrite effected zone, and
- We believe that there may be current court proceedings issued against a recently retired director of MEHL in the matter of the supply of pyrite containing aggregate used in housing construction throughout Fingal.

Conclusion.

We believe that all of the above potential liabilities, short and long term, should be reflected in the EPA ELRA and that the public have a right to be assured in any EPA Proposed Decision of their safety in these particular important matters.

Patrick Boyle, BE on behalf of Hollywood and District Conservation Group

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