

Environmental Protection  
Agency

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SUBMISSION NO. 83

Nevitt  
Lusk  
Co. Dublin  
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Mr Brian Meaney Inspector  
Waste Licencing  
EPA  
Johnstown Castle Estate  
Co. Wexford , Ireland  
Ref, MEHL WO129-03 Hollywood

Dear Mr. Meaney.

In relation to MEHL financial affairs, who exactly is applying for this waste licence?. Is it MEHL or NAMA ?.

Would you agree Mr Meaney , that MEHL response does not comply with Article 14/2/b/ii and Article 16/1 of Waste Management Licensing Regulations ?. At this stage , we are all fully aware of the issues involved.

As you all know Ireland lost its case in Europe in relation to EIA Directive [ split decision ]. This of course needs to be sorted by the Irish Government , and in relation to the Judicial Review process, we all know this process can take years.

European Commission told the Irish Government to register / protect this water resource / body in the Nevitt. This water resource /body also includes the MEHL site at Hollywood. Kevin Cullen Hydro geologist has campaigned for many years to save and expand the public water supply [ Bog of Ring ] into the water resource at the Nevitt.

A water reservoir should be built on the MEHL site [ second highest hill in Fingal ] and supplied by the aquifer underneath. We all know there are high yielding wells and artesian wells in the MEHL and Nevitt sites.

Possible contamination of a public water supply , possible contamination of horticultural wells that uses water to wash food for human consumption , possible contamination of house wells that uses the water for drinking , possible destruction of a water resource that is supplying water for hundreds of years . Is there anybody prepared to guarantee that the above will not be contaminated and of course back it up with financial guarantees [ of course, no escape clauses ]. Would you agree , for example , the MEHL / ARUP report covers themselves very well. Take page 34 , “ The analysis demonstrated that the N-S trending fault is hindering the movement of water across it.

However , it is not working as a complete barrier to flow “. Take page 36 , “ Due to the proximity of the Bog of Ring wellfield to the MEHL site [ ~2.6 km ] any impact observed at the MEHL site would be so small it would not be possible to identify in the existing Hydrography therefore it is not useful to examine the existence of an impact or not “. Take page 8 “ If continuous long term abstraction wells with average yields of 1000 m3 / day were located south of Decoy bridge along a zone that is roughly parallel to the M1 and east of the proposed landfill then the proposed landfill would potentially fall within the Zone of Contribution of these wells.

In relation to TW7 [ Walshestown Formation between MEHL and the Nevitt ] [ Ref. Bog of Ring Report ] , why did the water level drop in this well during tests in the Bog of Ring ?. On page 39 of the same report “ The hydrology of the Bog of Ring area is exceptionally complex. Therefore , drawing boundaries particularly in high transmissivity zones is difficult and some uncertainty is inevitable. Detailed drilling and monitoring in these areas would be required before precise boundaries could be delineated “. The EPA asked MEHL for certain drilling to be carried out. Why is this not completed?

We all need to get this right. There is no point in possibly destroying a water resource / public water supply in 10 years / 50 years / 100 years etc . Other submissions have mentioned the possibility of Pyrite and what impact would this have on a liner?. Dublin is now suffering a water shortage and will be for many years. Many jobs are depending on this clean water resource. Mr. Meaney should visit the area and talk to the small / medium businesses that depends on this clean water resource. This small water resource / public water supply is very important for our small economy in Fingal .

C.C. European Commission  
Directorate – General  
Environment, Brussels

Chairman  
Nevitt Lusk Action Group