Liz Leacy

Subiec	4.
SUBJEC	r.

FW: Objection to EPA ref Licence Register PO516-04

From: Brady, Joan
Sent: 22 September 2017 16:32
To: Wexford Receptionist <REC_WEX@epa.ie>; Liz Leacy <L.Leacy@epa.ie>
Cc:
Subject: FW: Objection to EPA ref Licence Register PO516-04

Liz.

We wish to make yourselves aware of the below ref Tara Mines Boliden Application for their IPC licence. We have already sent in an submission to yourselves as to why this shouldn't be granted but can you please add the below to the file also. The HSE in their submission state that they are aware that there are ongoing problems with leaks from the Tailings Pipelines – surely these should be addressed fully before permission is granted or not.

Thanks

Joan and Peter Brady

"We understand that the proposed development in respect of which the Industrial Emissions Directive Licence is being sought is required to be the subject of an Environmental Impact Assessment and that the obligations imposed by the Environmental Impact Assessment (EIA) Directive as implemented in national law are required to be complied with.

As is clear from their application for planning permission, a key factor for Boliden Tara Mines Limited choosing to seek permission to store tailings at the overall facility is the existence of an underground pipe in which the tailings are pumped from the main facility in Knockumber. This pipe runs under the redundant Navan – Kingscourt Railway line purportedly by way of agreement with Iarnrod Éireann. The volume of tailings to be disposed of per annum is greater than 1 million tonnes, and it all goes through this pipe.

Boliden Tara Mines Limited in their application for planning permission for development comprising a lateral extension of the existing Tailings Storage Facility submitted, amongst other things, that without the proposed tailings storage facility mining operations would likely have to cease by 2020. They also submitted that it will take just under 5 years to construct the tailings extension and it will have an operational duration of approximately 11 and a half years depending on the rate of mining and the rate of backfilling.

It is our understanding that an onsite risk assessment carried out by Boliden Tara Mines Limited has identified that there is a high risk of leaks occurring in this aforesaid pipeline from the mine to the tailings facility and on pipelines from the tailings facility to sumps at the reclaim pipeline. The pipeline from the mine to the tailings storage facility and the use of same appears to be an integral part of the development at issue.

In order to be compliant with the requirements of the EIA Directive, the totality of the development, which clearly includes the said pipe and use of same for the depositing of tailings to the proposed lateral extension to the tailings storage facility, must be the subject of an Environmental Impact Assessment. The issue of the pipeline and the structural integrity of same – which it appears has been called into question – has not been

the subject of any focus or consideration by Tara Mines Boliden Limited nor does it appear to have been adequately considered from an Environmental Impact Assessment perspective.

Joan and Peter Brady.

inspection purposes only any other use