



## Submission

on behalf of

Dermot Sheridan, Jordanstown, Lusk, Co. Dublin

Addressed to

Environmental Protection Agency

concerning an application by Fingal County Council for a Waste License to operate a landfill at Nevitt, Lusk, Co. Dublin

**W0231-01**

Dear Sirs,

I wish to make a submission concerning an application by Fingal County Council for a Waste License to operate a landfill at Nevitt, Lusk, Co. Dublin which is within 500 meters of my home.

At the outset, I wish to state that the EIS, as submitted by Fingal County Council (FCC), is biased and does not reflect a true and accurate picture of the inherent properties of the proposed site. I find that the lack of openness and transparency by FCC, and their consultants, to be very worrying. What are they hiding? I find it disturbing and alarming that a competent authority, funded by public money, should engage in deliberate distortion of facts in order to simplify their work. A competent authority should be honest in its dealings with the public, including those most affected by this proposal. It has been stated by the consultants engaged by FCC, as far back as 1997, that 'Tooman' (now known as Nevitt) was the preferred site and no amount of new information or new circumstances could persuade FCC to reconsider its position. I believe that the information contained in the EIS submitted by FCC to the EPA was tailored to support the application. Issues which did not fit comfortably in support of the application were understated or omitted in the EIS. For example, how can FCC explain the absence of a detailed aquifer map for the Fingal region? Why was the GSI not asked by FCC to provide a map? Why is the presence of gravel under the majority of the proposed site not stressed or even mentioned in the Executive Summary? Why has no map of the gravel deposits been included in the EIS?

I listened to most of the proceedings of a recent public hearing by An Bord Pleanála into the compulsory purchase of land and houses for the proposed landfill site and I particularly want to draw to your attention that a number of issues are a continuing source of concern for me, as follows:

1. The Precautionary Principle, as enshrined in the European Treaty, has not been appropriately considered or applied, as follows:
  - a) In reply to questions concerning the proliferation of springs within the footprint of the landfill site and their possible connection to the subsidence of the roadway running through the proposed site, FCC and their consultants showed that the presence of such springs was not fully investigated. The experts engaged by FCC put forward a number of possible

reasons for the subsidence in the roadway at the Nevitt, where many of the springs are present, without being able to clearly specify the cause. They stated that the springs could be due to surface water, groundwater or organic matter. If the spring close to borehole AGB10 and the nearby road subsidence is due to the presence of springs which originate from the underlying aquifer, the present engineering proposals are not sufficient to prevent contamination of water.

The adjacent Bog of the Ring is a rich source of potable water for surrounding towns and villages. The aquifer under the proposed site is linked to the Bog of the Ring and many boreholes in the area are artesian in nature. The link was not fully investigated by the EIS and subsequent data shows that the Bog of the Ring aquifer is linked to the proposed landfill footprint through the gravel. Assurances that engineering controls, such as a lining or membrane to ensure that the groundwater will not be contaminated, are not sufficient, especially since water rising through the artesian boreholes will be in contact with the lining of the landfill site and any defect in the lining will lead to contamination of the groundwater.

A detailed cross section of the proposed landfill was presented during the An Bord Pleanála (it was not included as part of the submitted EIS) and clearly shows that excavation to a level far below the existing water-table is planned. As a result, the proposed lining (membrane) will be in constant contact with water. It has already been accepted by FCC that some defects in the lining are inevitable, so it is reasonable to conclude that contamination of the groundwater is inevitable. This is unacceptable and is contrary to current European Union Directives regarding the protection of groundwater.

- c) The current proposal to transfer leachate, which has only been partially treated, from the landfill site past my house to a waste water treatment centre many miles away is not best practice and again poses a possible source of contamination for water.
- d) The control of vermin and flies has not been addressed in the EIS. There is an aspect of fly control which has not been dealt with and which is relevant and relates to the methods of fly control. Application of insecticides is the most commonly used method to control flies in landfills. Such applications give rise to environmental and health risks and to possible contamination of air, soil and both surface and groundwater. This issue has not been addressed at all in the EIS.

Concerning the control of vermin, again the use of pesticides (rodenticides normally) is frequently relied upon, again posing additional risks to scavenging wildlife. This has not been taken into account in the EIS.

- e) The potential health risk to children from emissions, vermin and flies is unknown. However, it is known that exposure to diseases and contaminants during the time when metabolism and growth is rapid, as in children, can have serious long-term effects on health. It is not acceptable to have a source of contaminants within 1 km and upwind of a school for 4-12 year olds.
- Flies acting as vectors for spread of disease and causing nuisance;
  - Vermin acting as vectors for spread of disease and causing nuisance;
  - Gases and smells causing health effects and nuisance;

- Dust particles and contaminants affecting the air and water;
- Pesticides used to control flies and vermin.

2. Additional considerations

- a) The principal reason for selecting the proposed landfill site, as stated by FCC and their consultants, was its proximity to the M1 motorway. During the public hearing FCC stated that the M1 is nearing capacity. An additional 700 HGV movements per day will have a considerable impact on the capacity of the M1 and will lead to a further increase in noise and air pollution in the vicinity of my home.


At no stage in the site selection process, or subsequently, was transport of waste by rail considered. Apart from being a more environmentally acceptable means of transport, it would greatly increase the distance which the waste could be transported, e.g. to areas where spare landfill capacity already exists.

- b) The proposal for FCC to enter a Public Private Partnership (PPP), with FCC holding the Waste License (if issued), weakens the control on the site and increases the risk of contamination. It also ensures that the EPA, as the enforcement authority, will be one step removed from the operator of the landfill.

On the basis of the above concerns, I believe that the Precautionary Principle should be applied and the application for Waste License by FCC should be refused.

If you require any clarification on the above or require further information, please contact me.

Yours sincerely

 9/11/06

Dermot Sheridan