

Dr. Ian Marnane,
Licensing Unit,
Office of Licensing and Guidance,
Environmental Protection Agency,
Johnstown Castle Estate,
County Wexford.

Sliding Rock,
Blackglen Road,
Sandyford,
Dublin 18.

13-3-2007

Re: Waste Licence Application W 0231-01 Fingal Landfill

Dear Dr. Marnane,

I refer to the Applicant's e-mail to the Agency of 9th March, 2007 and the accompanying report by Mr. Lar Spain in response to my submission of 14-2-07.

Firstly, it is interesting to note that neither;

- the hydrogeological team retained by the Applicant to prepare the EIS,
- nor TES who prepared the hydrogeological report on the Bog of the Ring scheme,
- nor the Geological Survey of Ireland

have yet (as far as I am aware) addressed my contention that a groundwater yield in the same order as that abstracted at the Bog of the Ring is available from the limestone aquifer at the Nevitt / Tooman area.

Clearly a significant groundwater resource is available at Nevitt / Toman otherwise my contention would have been easily discounted by any of the above specialists using the hydrogeological data gathered and presented in the Appendices accompanying the EIS.

I respectfully suggest that Mr. Spain is incorrect to state in his Summary that;

'It has been established that it is not sustainable to increase abstraction from the aquifer.'

The TES report on the Bog of the Ring abstraction merely concluded that the abstraction from the current well field in the limestone aquifer cannot be increased without increasing the present capture zone. The TES report does not address the issue of additional abstraction from the limestone aquifer away from the Bog of the Ring well field.

Environmental
Protection Agency

14 MAR 2007

I respectfully suggest that Mr. Spain is also incorrect to state in his Summary that;

'That the sustainable abstraction from the aquifer is estimated at 4 MLD (+/- 15%).'

Nowhere does the TES report conclude or even suggest that the present abstraction of 4MLD is the sustainable yield of the limestone aquifer in the north Fingal area. The sustainable yield of the limestone aquifer in north Fingal is many times the present abstraction from the Bog the Ring well field.

Again the Applicant appears to suggest that because the Local Authority may have no future need for additional groundwater abstractions in the north of the county that it is acceptable to compromise the future use of this resource with a landfill development.

While such a policy is clearly contrary to the concept of sustainability, the Local Authority fails to take into account the right of property owners to develop the groundwater resources beneath their lands. Currently such abstractions are free of any Local Authority water charges or levies in contrast to the waters provided from the mains supplies described by Mr. Spain in his statement to An Bord Pleanala.

Groundwater is widely developed throughout the country by farmers and industry as a source of potable and process waters. This is especially the case where, as in the north Fingal area, the underlying aquifers provide large sustainable yields.

I await the responses from the Applicant and the GSI to the Agency's requests of last November for additional information regarding the groundwater potential of the limestone aquifer in the Nevitt / Tooman area.

Thank you for your time.

Yours Sincerely,



EurGeol Kevin T. Cullen PGeo.