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10/06/07

SCANNED
20 JUN 2007

S ub (93)
Baile Na Ridire
Lusk

Fingal
County Dublin
Environmental
Protection Agency
20 JUN 2007

Ref. WO231-01 Proposed landfill at Nevitt Lusk

Dear Dr Marnane,

Please accept the enclosed information as a submission.

Facts

A. Fingal County Council are trying to put a landfill in the middle of the biggest cleanest food producing aquifer in Ireland. We challenge any body to contradict this statement. Approximately 55 % of the horticultural industry of Ireland is concentrated in Fingal over this aquifer. It can be traced back to over 300 years. RPS Larry O Toole admitted at oral hearing [all on record] that over 100 litres of leachate will leak out per day. Experts at the oral hearing said it would be between 100 l/d and 1000 l/d plus. RPS Larry O Toole should have picked the average 500 l/d plus . The figure 100 l/d adds up to an amazing one million litres of leachate going into this aquifer in 30 years, could it be 5 million litres or 10 million litres of leachate ? . RPS are trying to put a case for, inward pressure and using the Corduff river. The major problems in relying on inward pressure are ;

- 1 The horticultural industry can be traced back over 300 years. The plastic liner gives problems from 20 years on . Even if people say the liner can last 50, 60 years or whatever , you can only estimate the level of toxicity of the leachate at the different stages. This aquifer can deliver clean water for thousands of years but not if a landfill is put in the center of it , all is required is one accident.
- 2 Landslides of landfills have happened . Plastic liners break apart and leachate will mix with the water supply. The proposed landfill is on the side of a hill , beside a major motorway [approx 70 meters away]
- 3 Fires in landfills have happened. The heat will obviously melt the plastic liner and leachate will mix with the water supply.
- 4 Human error . All it takes is one mistake and a water supply and the horticultural industry destroyed.
- 5 Explosions of gas have happened . This will tear away the plastic liner and the leachate will mix with the water supply.
- 6 The Nevitt site is very complex with fault lines , highly fractured rock , bedrock sloped , huge depths of gravel etc.
- 7 There are probably more problems with inward pressure and we are Researching at the moment.

To the EPA , you have been advised on inward pressure for all to see now and in the future. It would be advisable not to attempt to use inward pressure as an Excuse even if you attach up to 500 conditions with it. It is too dangerous to Risk our water supply , our food supply and peoples health. Remember ,

Farmers are using the water from the Corduff river to irrigate the vegetables , potatoes etc for human consumption . Any discharge of liquid [what ever level of toxicity], will put peoples health at risk through the contamination of our food supply . Look at the present and look into the future, water and food shortages globally . This is extremely poor ,weak and irresponsible planning because one mistake you will destroy a water supply and a food supply.

B Fingal County Council [FCC] are trying to put a landfill on top of a water supply . KT Cullen report, all the artesian wells, the proven water extraction wells, the two old walk in approx 3 meters deep artesian wells [Mourns , at Whelans], one of the first wells to be drilled at Kavanaghs is artesian [flooded road and field , had to be capped] in the Nevitt and surrounding areas prove this fact. All the wells are recorded on a number of dvds and lodged with the EPA for all to see now and into the future. All across this aquifer is full of old and new gravel quarries including the Nevitt. Examine the bore wells in Annsbrooke , you will see a layer of gravel all across this area. Why were all the old and new gravel quarries not recorded from Garristown to Rush and 8 km wide , especially when so much gravel was recorded in the Nevitt and surrounding areas. Obviously, leachate will flow through this aquifer very quickly through the gravel. It is so obvious , there is a water supply in the Nevitt and surrounding areas [this is why the NATIONAL horticultural industry is concentrated on this aquifer for over 300 years, access to millions of litres of clean water every day]. You would need to be a complete fool, to say this is not a water supply. Guinness is possibly moving out of Dublin to a site around the south of Balbriggan , again one of the reasons access to clean bacteria free water . It seems everybody knows about the water apart from Shane in RPS.

C The Nevitt is joined to the Bog of the Ring public water supply , the only water supply in Fingal [the other one Lexlip Co Kildare] by seven different ways. What sort of a fool would suggest a water divide on a side of a hill, through seven different pathways , through different levels of rainfall [aquifer, drought] and the water divide is suppose to be at hr13 all the time ?.

The pathways;

- 1 The gravel
- 2 The topography of 50% approx. of proposed landfill is sloping down to the public water supply.
- 3 The bedrock of 50% approx. is sloping down to the public water supply. Remember FCC have confirmed on many occasions that the water is virtually bacteria free and meets all EU standards.
- 4 A syncline from underneath the proposed landfill is sloping down to the public water supply .
- 5 Dr Paul Ashley has raised the issue of clay permability. It seems water and therefore leachate will flow through the clay quicker than initially thought. See Dr Ashley report in a previous submission.
- 6 The rock is highly fractured in the Nevitt and surrounding areas.
- 7 A major North / South fault line , other smaller ones, from the Bog of the Ring to the Nevitt and to Annsbrooke your second preferred choice.

D There is a major issue with bird droppings [carrying disease like TB etc] landing on top of vegetables potatoes etc that is growing in the fields for human consumption. A lot of birds will be attracted inland from the sea and elsewhere. This is a major threat to the food supply. After a lot of rain , the Bog of the Ring is like a sea of water [photos in previous submissions] , the birds will be attracted there for water and again birds droppings carrying disease will put the water supply at risk.

E Archeology . The proposed landfill plume would extend over a possible tourist center. We have an archeological gem in the Nevitt, why destroy it ?.

F If the Environmental Protection Agency EPA grants a licence for this landfill , you will be going against the Department of Heritage Environment and Local Government DOHELG , Geological Survey of Ireland GSI and your own rules/ guidelines on aquifer classification [we presume the purpose is to protect our water resources].

The Nevitt is a water supply and therefore R4. The zone of contribution ZOC from the public water supply at the Bog of the Ring extends into the Nevitt and therefore R4 [GSI Report]. Two industrial wells ZOC extends into the Nevitt and therefore R4 [White Young Green Report]. R4 means you cannot put a landfill in the Nevitt and of course you are not suppose to put a landfill on huge depths of gravel. This aquifer is full of industrial wells and therefore R4.

G The chemical composition of the water in the Bog of the Ring is exactly the same as the water in the Nevitt and throughout the whole of this aquifer. All the wells in the horticultural industry have their water tested every two months approximately. Jim Burke , the original engineer and hydrologist said over two years six months ago that this aquifer is a homogenous water resource , that is ,it is all connected. Nevitt Lusk Action Group NLAG and Jim Burke asked FCC over 2 years ago to carry out a harmless dye test. You should have done this test because it would have saved you time, money and embarrssment because it is quite obvious this aquifer is one huge water resource and all connected through gravel. We now of course have enough technical knowledge to prove Jim Burke is correct. Jim Burke is the original engineer to work on the Bog of the Ring.

H It should not be up to NLAG and the farmers to protect this aquifer , to protect the only water supply in Fingal, to protect the new water supply in the Nevitt, and to protect the huge horticultural industry. The NLAG are a peaceful organization and can hold their heads high no matter where we go in the world. We are working hard to protect the biggest natural asset in Fingal , the aquifer. The Green party has already praised us for our committment to saving this aquifer. It is a pity that the six individuals who planned and researched this project did not do there research properly

IN EIS
No gravel in landfill
Footprint

THE TRUTH
Up to 15/ 16 m of
gravel approx.

Example of water
Kerrigans well 15 gal / hr

Kerrigans well can produce one million litres of water per day , plus Many more artesian wells [on Record at oral hearing]

Clay over 20 m

At agb4 0.7 m of clay , then Gravel and many more areas With small depths of clay.

The EPA , GSI and the horticultural industry have been aware of this aquifer. Why is the aquifer map of Fingal , all the reports , surveys of this huge horticultural industry [that can be traced back over 300 years] left out of your multi million euro EIS. You have obviously been caught out , this EIS is not complete ,therefore inadequate and must be rejected.

I FCC are putting our food supply [remember people have died in America eating contaminated spinach] and our water resource [remember Galway] at very serious risk by trying to put a landfill in the center of this aquifer. The NLAG and the farmers will bring this fight to the High Court and to Europe if necessary . The truth is on our side and we can back the truth up with physical , factual , technical knowledge. So far, we have made 4 models [bedrock, archeology, aquifer and topography]. One model is a complex working model of the nevitt including showing artesian conditions. This model clearly shows the Nevitt is connected to the Bog of the Ring. We have researched , designed and made these models over two and a half years. These models are with Bord Pleanála . We also made a model of bedrock , fault lines etc and is with the EPA. RPS have made no physical models and in fact did not carry out a mod flow when requested by the EPA.

FCC are a responsible organization , it is obvious they were not told the facts during this process. This aquifer has delivered water to the horticultural industry for over 300 years. There is no reasonable reason why this aquifer can not deliver clean bacteria free water for thousands of years. The average human lives for approx, 70 years. Each generation have only a short time on this planet. This aquifer can live for thousands of years , providing you do not kill it by putting a landfill in the center of it. The world is facing a global water shortage. There are so many water resources in Ireland contaminated [Galway a recent example]. It is time the EPA sends a very strong clear message to Councils and consultants , stay well clear of our water resources when planning projects of this type. Never try to put a landfill on top of a water supply [with huge depths of gravel , in an R4 situation] like the Nevitt ever again.

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Bsc [hons]

Note ; The four individuals within RPS have again refused to change the misrepresentation of the gravel in the non technical summary, even though these four people have produced a map of the gravel contradicting themselves, not very professional boys. You are letting down RPS and FCC. NLAG still holds the high technical ground and the high moral ground , you have been caught out.

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