SuB. 104 Office

10/08/07

Little Acre Cottage Walshestown Lusk Co.Dublin

Ref.: WO231-01 Proposed Nevitt Landfill.

Dr Ian Marnane,

It is now imperative that the EPA refuse this waste license application given the solid mass of hard evidence which has been presented proving beyond all reasonable doubt that the Nevitt site cannot and must not be used for landfill.

The presence of a sensitive aquifer beneath the site is reason enough to refuse permission without all the other compelling evidence that is now available. In the 16th century Leonardo De Vinchi commented that the protection and maintenance of clean running water is as important as the blood running through our veins (source) Codex Lester Collections. The Chester Beaty library. In the recent environmentally charged movie "An Inconvenient Truth" (by Al Gore) it is revealed that in less than 50 years from now 40% of the world population will be without fresh clean drinking water.

The writing is now on the wall for all regulators to act responsibly to protect all groundwater irrespective of its classification. Can the board of the EPA and its officials confidently and consciously grant approval of this license in the knowledge that a highly sensitive aquifer is beneath the site.

There is now unlimited scientific evidence in the public domain that the so called fully engineered landfills fail with disastrous consequences due to any of the following, breaches, leaks, fires, explosions, chemical breakdown, failures from welds and seals, settlement, pressures, sharp objects, slope instability and in particular locating the footprint on 0.7 metres of clay that is surrounded by extensive gravel depths and highly productive public, private and industrial wells of which over 130 are down gradient of the landfill (source) NLAG Well Survey.

Using clay as prevention for pollution is a very difficult concept when its known that groundwater does not necessarily move downwards but rather moves left to right or vice versa in deep gravel beds.

The NLAG are currently co-ordinating talks between government ministers, GSI, EPA, An Taisce, Teagasc etc, Prof. Paul Johnston and other interested parties to seek to change current legislation regarding groundwater protection throughout the country.

The "Precautionary Principle"

A Bias towards safety in the face of uncertainty lies at the heart of the EU approach to environmental regulations "Better safe than sorry" seems like common sense to many people.

The EIS for this proposal has clearly shown that an appalling vista of errors has occurred in the selecting of this site for landfill. Maladministration -naming site Tooman and misleading the local people. Incompetent surveys by RPS.

The well survey - no attempt was made to correct this or to substantiate the existing survey. There was no comprehensive health impact assessment. The population survey was wholly inaccurate and didn't include Thomas Hagen or his property at Rowans Little. The loss in property and land valuations was bordering on inept.

The impact assessment surveys and summaries were more appropriate to the construction of a children's playground.

The horticulture and agriculture surveys were simply not carried out. The location survey placed the site in Tooman but it ended up in the centre of the Nevitt. The geological surveys were carried out without consulting aquifer maps or gravel maps. The proximity to schools survey measured Hedgestown School from Tooman not Nevitt. The widespread monitoring of productive wells did not occur, therefor RPS/FCC were not aware of their existence.

The EPA must have regard to its own regulations and guidelines and if the EIS cannot fully meet these and also satisfy the current Irish and European legislation then it must refuse the licence. For example, the EU groundwater directive clearly states that; groundwater should not be polluted at all and protected to such a degree that additional treatment is not required, i.e. potable good quality groundwater for equitable use.

Regulations must seek to protect and enhance aquatic ecosystems and promote protection for long-term sustainable water usage.

Mr Kevin Cullen has shown (previous submission) that this proposal is not sustainable and that the plastic liners degrade with stress and time constraints.

This proposal poses a significant and imminent threat to the following; The environment and local ecosystems with loss of Biodiversity and possible extinction of several species including many acres of trees (some of which are protected) loss of horticulture and agriculture industries which represent 55% - 60% of the national average of all produce grown in Ireland.

Quality of Life

Animals and wildlife, aquatic and marine life, birds, horses, farm life. People living in close proximity and school going children who will spend their school time just 500m from the footprint of Europe's largest mixed waste landfill. These children and the parents and guardians will also have to negotiate the local roads network with HGVS, but without footpaths, street lights, cycleways or safety barriers of any description, (another totally incompetent survey by RPS) and to top it off they will need to wear gas masks on their journeys because of the toxic pollution they will encouter.

There is an above average incidence of asthma in Hedgestown School (source principal MR Eddie Kirk previous submission).

Effects of Global Warming

Kyoto was established in 1997 to tackle global warming yet Irelands contribution remains to be the payment of massive fines with taxpayers money as an alternative to making necessary changes to tackle the problems we face. 40% of world's population depend on water from river and spring systems but in less than fifty years these people will be without water if something is not done.

The USA began measuring Co2 in 1958 and since then have found its growth to be relentless. For many years Co2 levels never went beyond 300 PPM (parts per million) but in recent times this figure has doubled and again in less than 50 more years this figure will double again.

Antarctic

There are only 22,000 polar bear left in the world as a high percentage of them are drowning due to melting and distant ice beds for them to rest upon.

1930's UK

Winston Churchill warned the people of England that it was a phenomenon different to anything that had ever happened before. "The era of procrastination, of half measures, of soothing and baffling expedients, of delays, is coming to its close. In its place we are entering a period of consequences, November 12th 1936.

Atmospheric Temperature

There is a constant increase in atmospheric temperatures. Since 1880-(American Civil War) the trend is rising uninterrupted and intensifying. Infact the 10 hottest years ever measured and recorded have all occurred in the last 14 years. The hottest being 2005. These temperatures create untold problems for nature and ecology. A study from the Netherlands on migratory birds discovered that the peak arrival date 25 years ago was April 25th and their chicks hatched on June 23rd just at the same time that caterpillars were coming out (nature's plan). But 20 years of warming later the caterpillars peaked 2 weeks earlier and the new chicks had a major problem. They tried to catch up with them but they couldn't so now they were in trouble.

There are millions of other ecological examples of niches effected by global warming in this way.

Another example is the amount of vectors for infectious diseases emerging, mosquitoes, rodent's, ticks, bats, fleas, snails, algae and many more. These can be responsible for spreading many diseases including Ecoli, Ebola, Arena virus (Sars) severe acute respiratory syndrome, avian flu, salmonella and superbugs for which there will be no antibiotics. Making foolish mistakes with nature will present serious consequences later. **Take note!**

Celine Blake On Behalf of the Nevitt Lusk Action Group

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