

OH Doc No: 16 A

Rec'd From: Marion

Statement to EPA hearing re Fingal Co. Co. Landfill Prop

Short H.
Date Rec'd: 10/03/08
9.30 a.m.

(On behalf of Mary Lynch, Jordanstown)

EPA Ref. W0231-01

My family residence is located approximately 600 metres East of the FCC Proposal. We bought the site in the early 1980s. The site was chosen because of its rural location, its clean environment and the proximity of the local national school. We built our own house and have reared four children who have grown up in the area and regard it as home.

Since this proposal was introduced, we have lived under a threat, which short of having the house repossessed, we regard as the worst possible outcome for the family. Indeed, while we sympathise deeply with those families who may be the subject of a CPO, we view them in a funny kind of way, as the lucky ones. Despite the undoubted trauma of being forced to leave their home, at least they will have the opportunity to make a new start elsewhere.

While we are not experts in any aspects of landfill, we have made it our business to understand the proposal as much as we can. We have read copiously, read about the effects of large landfills and attended all FCC information sessions. We attended the Bord Pleanala hearing in 2005 and listened carefully to the evidence presented.

So why all this pessimism, you might ask! Before answering this question, let me briefly summarise some of the more significant points of the evidence that I have noted so far.

- Landfill generates leachate, which is a very noxious substance capable of causing serious pollution, especially if it gets into water used for human consumption or horticultural production.
- We have from Dr. Ashley that all landfill membranes leak. It is a feature of the membrane technology used in dumps. Leakage also depends on

the integrity of jointing and any later subsidence or settlement during the life of the proposal (in this case 30 years of active dumping followed by an undefined period of subsequent settlement – 100 yrs. has been mentioned !) It was interesting to note that this point was not challenged by FCC. (Indeed, from the Bord Pleanala hearing, we heard evidence, which incidentally was also not challenged by FCC, that hundreds if not thousands of litres of leachate per annum may leak through dump liner systems.

- We have been told we needn't worry about any leachate which gets through because it will be blocked by 10 meters of low-permeability clay. (More about that in a moment)
- We heard how all the nasty leachate generated will be collected, processed by first of all recirculating it through the dump, a practice which seems very puzzling. (While I am not an agricultural expert, I can imagine the response of the Dept. of Agriculture to a proposal to deal with slurry by pumping it back through the manure heap which generated it).
- Any leachate which is not caused to be purified by this proposal (or otherwise vanish ?) will then be collected and trucked off or else pumped through a private sewer line to be inflicted on the unfortunate residents of the Portrane / Donabate peninsula.
- The leachate is to be processed by an installation which has not yet been approved (A 65k pe plant will only handle local sewage)
- It was again interesting to note that this sewer may be '6in. or maybe 8in in diameter' - we were not quite sure. FCC would seem to regard this as a minor detail to be worked out once the proposal is up and running. (Speaking of major infrastructural projects, the Port Tunnel comes to mind. This is perhaps unfair as, no doubt, all lessons learned,

especially those concerning leaks, will be taken on board for future major infrastructure projects)

- We heard evidence given by eminent people such as:
 - Mr David Hammerstein, who expressed surprise at comments that the whole of Ireland was sitting on an aquifer. (I'm not sure exactly what the implication of this statement is, i.e. whether there is no point in being fussy about where you put a 10 million ton landfill or some other suggestion). Anyway, Mr Hammerstein seemed to be less than impressed by this response and by our general approach to managing our water resources.
 - We heard a no-punches-pulled statement from Mr. Proinsias De Rossa on behalf of the European Petitions Committee which stated that
 - He believes 'that the FCC produced inadequate and misleading information' and
 - that 'The EPA must not accept assurances on this important issue at face value'.
 - It is also interesting to note Mr. De Rossa's comments on 'the bizarre application of the precautionary principle' by FCC where, instead of seeking to prevent the risk of pollution of a water source, FCC see it as supporting the taking of risk with a valuable and irreplaceable resource, a move which I understand from Mr. De Rossa, is contrary to EU law.
 - We heard from Minister Trevor Sargent how important the Horticulture sector is to North Dublin. We also heard how, even the Perception of a risk to this sector would be likely to result in irreparable damage and loss of livelihood to those involved.

In response to these and many other questions and concerns raised, the response from FCC has been noteworthy in many respects.

Many direct questions were simply stonewalled and not answered. I have seldom heard such repeated obfuscation, hiding behind jargon and downright refusal to answer simple questions. In my opinion, the way in which some of the eminent experts responded to questions was disgraceful. I do not understand how the Inspectorate has been able to exhibit such patience with behaviour which I would class, and I am sure will many of those listening, as downright obstructive and unhelpful.

After over a week of patient probing, instead of becoming better informed about FCC's proposal, I have accumulated an every increasing list of unanswered questions, all of which have serious implications for my family and those who may inherit the legacy of this decision. A sample includes:

1. Is the proposal sitting on an aquifer, which is used to produce and process food that we eat, and is it capable of damaging this aquifer.
2. Is there 10m low permeability clay underlying all of the proposed site?
3. How low is 'low'. How has this been objectively determined?
4. Given the determined value, what is the cumulative result and possible effects of same over the life of the proposal?
5. Why were the possible effects of a known non-authorized dump of 160,000 cubic metres initially ignored? What do arguments on semantics tell us?
6. Why was there no computer modelling of the proposed system used to try and determine that which any lay person might regard as a fundamental check, i.e. Have we confirmed that $Outputs = Inputs$ so that we know our analysis has some basic validity.
7. Has the impact on the environment of hauling 10 million tons of rubbish, some of which will be hauled from as far away as Dun Laoighre / Rathdowney to the site, which is farthest from the source,

been determined and factored into an overall cost / benefit model of the proposal.

8. Will the haulage of this amount of material continue to be a rational option as energy costs inevitable climb in the future.
9. Has the effect of the substantial progress in waste reduction (a) already made and (b) yet to be achieved , been factored into the equations (sofar unseen) which justify a 10 million ton dump.

I hope at this stage that you might have some understanding of the reasons for my scepticism and pessimism. You will note that I have so far avoided outlining the implications of a 30% to 40% loss in property value to my family and their options in the future. (Ref evidence given to An Bord Pleanala). I leave you to imagine how I might feel when told that my grandchildren would benefit by community improvements such as footpaths, etc.

While not wishing to pre-judge the wisdom of your opinion or pre-empt your recommendation to the Agency Mr. Inspectors, I suggest that, at this point, the FCC proposal is so full of holes and undermined by so many unanswered questions that the proposal has lost all credibility. It does not, in my opinion now rate as a serious attempt to deal with a very serious issue of significant importance not only at local level but nationally and perhaps even at a European level as well.

I believe that with the eyes of Europe watching and being mindful of what we may inflict on future generations if we don't get this right, any interpretation and application of the precautionary principle should result in the outright rejection of this proposal or, at minimum, result in the proposal being 'sent back to the drawing board'. I would also recommend that any contributors to the proposal who have demonstrated an inability to understand and manage such basic matters as drawing revisions be excluded from participation in any future proposals.

Thank you for listening.