

***Evidence to EPA Oral Hearing
for
Fingal Landfill Facility at Nevitt, Lusk,
Waste License Proposed Decision
Registration No. WO231-01
Balbriggan, March 2008***

***Statement of Evidence by Dermot Sheridan,
Jordanstown, Lusk, Co. Dublin***

Thank you, Chairman, for providing me with this opportunity to provide my statement to this hearing.

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 dishonesty in order to simplify their work. They 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 in the EIS or omitted altogether.

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 an aquifer map?

Why is the presence of gravel under the majority of the proposed site not stressed or even mentioned in the Executive Summary?

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 through the gravel. Assurances that engineering controls, such as a lining, will 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. This is unacceptable and is contrary to current European Union Directives regarding the protection of groundwater.

- b) 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.
- c) No mention of control of vermin and flies has been made in the EIS. There is an aspect of fly control which has not been dealt with and which is relevant. It relates to the methods of fly control. The most commonly used method to control flies is by application of insecticides. Many of the pesticides used are organophosphates which exhibit neurotoxicological effects. The application of pesticides gives rise to environmental and health risks and to contamination of air, soil and both surface and groundwater. This issue, which has not been addressed at all in the EIS, is a very significant concern especially for those working or living in close proximity to the site.

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

- d) The potential health risk to children from emissions, vermin and flies is unknown. However, it is known that exposure to diseases, contaminants and pesticides 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 disease spread and causing nuisance
 - Vermin acting as vectors for disease spread 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

- e) The proposal for FCC to enter a Public Private Partnership, with FCC holding the Waste License (if issued), weakens the control on the site and increases the risk of contamination.

2. Additional considerations

- a) Traffic: 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.

There will be a considerable increase in the volume of heavy goods traffic on the M50, M1 and the county road from Courtlough Interchange. At present, the M50 is unable to cater for the current traffic flow and will certainly be unable to cater for the increased traffic flow, especially since almost half of the waste will be originating south of the river Liffey. It is estimated in the EIS that the landfill will lead to an increase of approx. 700 truck movements per day at the Courtlough Interchange but no effort was made to estimate the effects at other points along the route. These 700 truck movements must originate from somewhere and must have a serious effect on traffic volumes.

In addition, it should be noted that not all traffic will come from the M50 direction and will be using county roads, and smaller, to access the Courtlough Interchange. None of the roads in the area are capable of handling the increased level of traffic.

At no stage in the site selection process, or subsequently, was transport of waste by rail considered. This would greatly increase the range for transporting the waste to areas where spare landfill capacity exists.

- b) The siting of a landfill in such close proximity to our home will have a serious impact on the value of our home. We will have all the disadvantages of a nearby landfill with no potential for compensation.
- c) Eviction of people from their homes will also result in the destruction of a community, with many of the families having lived in the area for generations.

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

Thank you, Mr. Chairman,