

OH(2) Sub No. 10

Recd From: DECLAN
WHITE.

Date: 29/4/09 Ham.

Knightstown
Lusk
Co. Dublin
26/04/09

Ref. No.: Wo231-01

The Irish Environmental Protection Agency EPA are trying to put a landfill in a perfectly good water supply and in the center of the biggest cleanest food producing aquifer in Ireland [your yes proposed decision]. A water supply that is confirmed by the physical evidence and Hydrogeologists. The Horticultural Industry [which depends on this clean ground water], confirmed by farmers / processors and the minister for Food, Trevor Sargent. The following people in the EPA have made and / or connected in making a yes proposed decision to put a landfill in the Nevitt , Lusk , County Dublin. We note the following are intelligent people.

Mary Kelly ; Director General EPA [connected by a letter to Europe]

Dr. Ian Marnane ; first Inspector

Jonathan Derham

Dr Padraic Larkin

Mr. Dara Lynott

Ms Laura Burke

Mr Larry Stapleton

Above names have been confirmed by a letter from the EPA.

Everybody has to accept responsibility for these decisions , actions and therefore we believe it is reasonable and fair to ask you Ladies and Gentlemen the following.

We want a detailed technical response from every one of you, explaining why you have ignored the water supply, all the experts and the Horticultural Industry that is supporting thousands of jobs. Ireland cannot afford to lose any more jobs. We note that approximately 30 % of our water supplies are in amber alert. Galways water supply contaminated. Ennis water supply contaminated. Almost 120,000 people were told to boil or not drink their tap water because it was infected with potentially deadly bugs.

A copy of this report to be sent to all above names.

The Nevitt is part of a much bigger water supply. For example in the Nevitt;

Pump test 1 ; 560,000 litres of water per day

Pump test 2 ; 311,000 litres per day l/d

Pump test 3 ; 623,000 l/d

Artesian wells in the Nevitt

The applicant confirms 1.5 million litres of water flows underneath the Nevitt every day. We believe the figure is closer to 3 million litres of water per day because of the high yielding industrial wells close by.

For example;

Kerrigans ; 650,000 l/d [capacity 1.9 million l/d]

Moores 750,000 l/d

Larry Hagan 800,000 l/d

Country Crest 3 million l/d

John Landy 436,000 l/d

John Murray 872,000 l/d

Thorns 750,000 l/d [a new industrial well, zone of contribution extending underneath proposed landfill and remember industrial wells have the same protection as public water supplies]. That is three Industrial wells ZOC extending underneath this proposed landfill as confirmed by White, Young and Green Hydrogeologists.

Bergins 2 million l/d

At 1.5 million to 3 million litres of water flows through the Nevitt every day. That is 10.5 to 21 million litres of water flows through every week. That is 546 to 1092 million litres of clean fresh bacteria free water, flows through the Nevitt every year. Remember the applicant admits that 546 million litres of water flows through the Nevitt every year.

The EPA yes proposed decision is partly based on the first set of bedrock and gravel maps that have now been proven to be incorrect. The applicant has since produced version 2 and even version 3. Even these maps are not correct or complete . Where is the North/ South feature underneath the proposed landfill. Kevin Cullen and Patrick Boyle has indentified this feature as a smaller N/S fault line. We told the EPA from the start that these maps version 1, were not correct and again we have been proven to be correct by the fact that the applicant has produced version 2 and 3. When is the EPA going to start listening to the truth?.

We will be pushing hard for an investigation from the European Commission [they have already told you to protect this area as a water supply].

To the three gentlemen conducting the present hearing;

Mr. Inspector Patrick Byrne

Mr. Mistear

Mr. Kealan Reynolds

I know you three gentlemen are intelligent.

You three gentlemen have a choice, to support the seven people in the EPA or ;
To protect this water supply
To save the Horticultural industry [that depends on this clean water]
To save thousands of jobs working in this industry.

Why Mr. Inspector have the EPA taken on board so much incorrect information ?
Three different Non Technical Summaries NTS. Why have you Mr. Inspector not asked for a proper NTS including the Horticultural Industry, industrial wells etc.?.
Three different bedrock and gravel maps. Why have you Mr. Inspector not asked for a proper set of maps?[working closely with experts Kevin Cullen and Dr. Paul Ashley].
The applicant has shown that another section of the EIS is in-correct in relation to trench 17/19. What exactly is the truth here?. Why have you Mr. Inspector not asked for the truth to be put into the EIS?
The applicant has admitted they got the quantity of waste wrong in the illegal landfill. When is the EPA going to clean up this illegal landfill?
The EPA asked for a MOD flow [at last a sign of professionalism] but then you withdrew this request , why?.
Dr. Ian Marnane recommends not to use the water to the east of this proposed landfill in his report. How can you issue a license on this basis ?
Who removed the corner of the Nevitt Townland? Of course we now know the major N/S fault line goes through the Nevitt. Why did the EPA not pick up on this?
As a matter of fact , what exactly did the EPA pick up on, in relation to this project?
Why have you Mr. Inspector or Mr. Misteer not asked for a depth of clay map?. After all it is a basic map and a very important map.

Are the EPA back tracking in requesting for more work to be completed. Why did the EPA not ask for this work to be completed before your yes proposed decision?
We predicted the response would be a technical disgrace in a letter sent to Mary Kelly and EC dated 1/1/09. Again we have been proven correct. The applicant shows [Feb. 09 report page 20] that Landsim does not account for the presence of diffusive flux, it is not an appropriate model to predict impacts arising from the migration of contaminates throughout the entire lifecycle of the site. Then the applicant decides to stick on a spreadsheet [not validated] with ranges with all its limitations. This report can now be put into the bin. How much did this report cost the Irish taxpayer ?
The applicant consultants produced a water report recently , which show the Fingal Aquifer water supply including the Nevitt. They the applicant also recommend that priority should be given to protecting these resources.

Many experts agree that the response from the applicant is incorrect and they even admit themselves that landsim is not an appropriate model.

Why have you three gentlemen not brought the truth out in the open and into the EIS up to now?. I am specifically referring to the truth about the water supply, industrial wells, Horticultural industry , a proper Non Technical Summary etc..

Our water supplies are not negotiable or expendable and how dare the EPA tries to put a landfill in a water supply and in the biggest cleanest food producing Aquifer in Ireland. We will be pushing hard for the European Commission to start a full investigation into the Irish EPA and this project.

I enclose the certificate of analysis for water samples. One sample was taken beside the old well in the river [beside road] and the other sample beside the Nevitt bridge in the river. We were told there is groundwater in these rivers/streams. Experts will have to examine these certificates because I am not a hydro geologist.

I asked Mr. Boyle to produce a contour map of the water levels in the clay . I enclose a copy of this contour map from Mr. Boyle.

A copy of this report to be sent to the European Commission.

Thanking you

Declan White

Declan White B Sc [hors]

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Dear Declan,

During investigations for an oral hearing for a proposed motorway service area at Ballough near Lusk, I investigated Electrical Conductivity (EC) values in the streams and watercourses around the area near the An Bord Gais pumping station. Electrical conductivity is a measure of the ability of water to carry an electric current. The electric current is conducted by the movement of dissolved salts or ions in the water. This results in higher values of electrical conductivity being recorded in water that has a higher concentration of dissolved salts present due to a higher ability to generate electrical current. The electrical conductivity of rainwater tends to be of the range between 20 and 200 μScm^{-1} and groundwater tends to have an electrical conductivity range between 200 and 1500 μScm^{-1} . The salts that are dissolved in groundwater generally originate from the soil and geological formations that the water has travelled through.

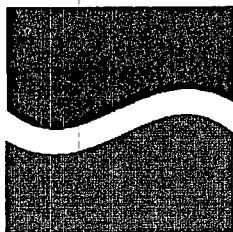
The values of Electrical Conductivities (EC) that I found during my investigations last July were between 550 μScm^{-1} and 900 μScm^{-1} in both the streams and watercourses in the surrounding area. This would indicate that the water has its origin from groundwater sources. This could be from either inflows from springs or wells in the local area or from upward groundwater seepage in the area due to artesian conditions.

During preliminary soil investigations in the area for the above stated motorway service area, artesian conditions were identified as being present in the area. This would strengthen the argument that there are naturally occurring groundwater upwelling or seepage areas in the area. If this were the case this would lead to a groundwater aquifer vulnerability rating of extreme in the surrounding area.

I trust that this is of some assistance to you,

Give me a call if you need any more help,

Patrick Morrissey
B.A., B.A.I., MSc, MIEI



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Customer	Declan White Private Customer Knightston Lusk Co. Dublin	Lab Report Ref. No.	4700/136/01
Customer PO		Date of Receipt	14/04/2009
Customer Ref	J. Short Mourns (Site A)	Date Testing Commenced	14/04/2009
		Received or Collected	Delivered by Customer
		Condition on Receipt	Acceptable
		Date of Report	23/04/2009
		Sample Type	Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Aluminium	177	ICPMS	312.5	ug/L	
Antimony	177	ICPMS	<0.13	ug/L	
Arsenic	177	ICPMS	1.9	ug/L	
Barium	177	ICPMS	25.4	ug/L	
Beryllium	177	ICPMS	<0.2	ug/L	
BOD	113	Electrometry	<2	mg/L	
Boron	177	ICPMS	<4.2	ug/L	
Cadmium	177	ICPMS	<0.09	ug/L	
Cesium	177	ICPMS	<0.37	ug/L	
Chromium	177	ICPMS	<0.93	ug/L	
Cobalt	177	ICPMS	0.2	ug/L	
COD	107	Colorimetry	19	mg/L	UKAS
Conductivity	112	Electrometry	782.0	µscm -1@25C	UKAS
Copper	177	ICPMS	<0.2	ug/L	
Gallium	177	ICPMS	<0.32	ug/L	
Iron (Total)	177	ICPMS	430.2	ug/L	
Lead	177	ICPMS	<0.38	ug/L	
Lithium	177	ICPMS	<3.32	ug/L	
Manganese	177	ICPMS	41.5	ug/L	
Nickel	177	ICPMS	0.9	ug/L	
pH	110	Electrometry	8.2	pH Units	UKAS
Phosphate (Total)	166	Digestion/ Colorimetry	0.111	mg/L as P	UKAS
Rubidium	177	ICPMS	1.2	ug/L	
Selenium	177	ICPMS	5	ug/L	
Silver	177	ICPMS	<0.33	ug/L	

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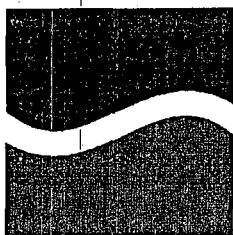
Signed : Katherine McQuillan

Date : 23/4/09

Katherine McQuillan - Deputy Technical Manager

Acc. : Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C
Results shall not be reproduced, except in full, without the approval of EURO environmental services
Results contained in this report relate only to the samples tested



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Customer PO		Date of Receipt	14/04/2009
Customer Ref	J. Short Mourns (Site A)	Date Testing Commenced	14/04/2009
		Received or Collected	Delivered by Customer
		Condition on Receipt	Acceptable
		Date of Report	23/04/2009
		Sample Type	Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Strontium	177	ICPMS	253.9	ug/L	
Thallium	177	ICPMS	<0.2	ug/L	
Tin	177	ICPMS	<2.8	ug/L	
Uranium	177	ICPMS	2.8	ug/L	
Vanadium	177	ICPMS	<4.0	ug/L	
Zinc	177	ICPMS	<4.6	ug/L	

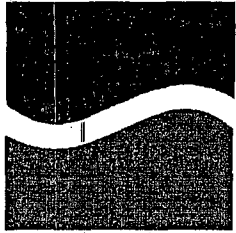
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Signed: Kat Quillan
Katherine McQuillan - Deputy Technical Manager

Date: 23/4/09

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Customer	Declan White Private Customer Knightston Lusk Co. Dublin	Lab Report Ref. No.	4700/136/02
Customer PO		Date of Receipt	14/04/2009
Customer Ref	Motorway Ballough Stream	Date Testing Commenced	14/04/2009
		Received or Collected	Delivered by Customer
		Condition on Receipt	Acceptable
		Date of Report	23/04/2009
		Sample Type	Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Aluminium	177	ICPMS	668.4	ug/L	
Antimony	177	ICPMS	<0.13	ug/L	
Arsenic	177	ICPMS	1.5	ug/L	
Barium	177	ICPMS	39.6	ug/L	
Beryllium	177	ICPMS	<0.2	ug/L	
BOD	113	Electrometry	<2	mg/L	
Boron	177	ICPMS	42.7	ug/L	
Cadmium	177	ICPMS	<0.09	ug/L	
Cesium	177	ICPMS	<0.37	ug/L	
Chromium	177	ICPMS	<0.93	ug/L	
Cobalt	177	ICPMS	0.5	ug/L	
COD	107	Colorimetry	9	mg/L	UKAS
Conductivity	112	Electrometry	805.0	µscm -1@25C	UKAS
Copper	177	ICPMS	2	ug/L	
Gallium	177	ICPMS	<0.32	ug/L	
Iron (Total)	177	ICPMS	877.6	ug/L	
Lead	177	ICPMS	<0.38	ug/L	
Lithium	177	ICPMS	<3.32	ug/L	
Manganese	177	ICPMS	126.4	ug/L	
Nickel	177	ICPMS	3.1	ug/L	
pH	110	Electrometry	8.2	pH Units	UKAS
Phosphate (Total)	166	Digestion/ Colorimetry	0.110	mg/L as P	UKAS
Rubidium	177	ICPMS	3.4	ug/L	
Selenium	177	ICPMS	12	ug/L	
Silver	177	ICPMS	<0.33	ug/L	

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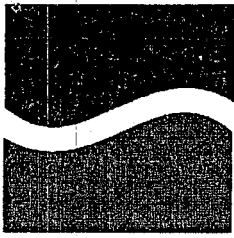
Signed: PM Quillan

Date: 23/4/09

Katherine McQuillan - Deputy Technical Manager

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Customer Ref	Motorway Ballough Stream	Date Testing Commenced	14/04/2009
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		Condition on Receipt	Acceptable
		Date of Report	23/04/2009
		Sample Type	Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Strontium	177	ICPMS	620.1	ug/L	
Thallium	177	ICPMS	<0.2	ug/L	
Tin	177	ICPMS	<2.8	ug/L	
Uranium	177	ICPMS	11.0	ug/L	
Vanadium	177	ICPMS	<4.0	ug/L	
Zinc	177	ICPMS	<4.6	ug/L	

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Signed : *Katherine McQuillan*

Katherine McQuillan - Deputy Technical Manager

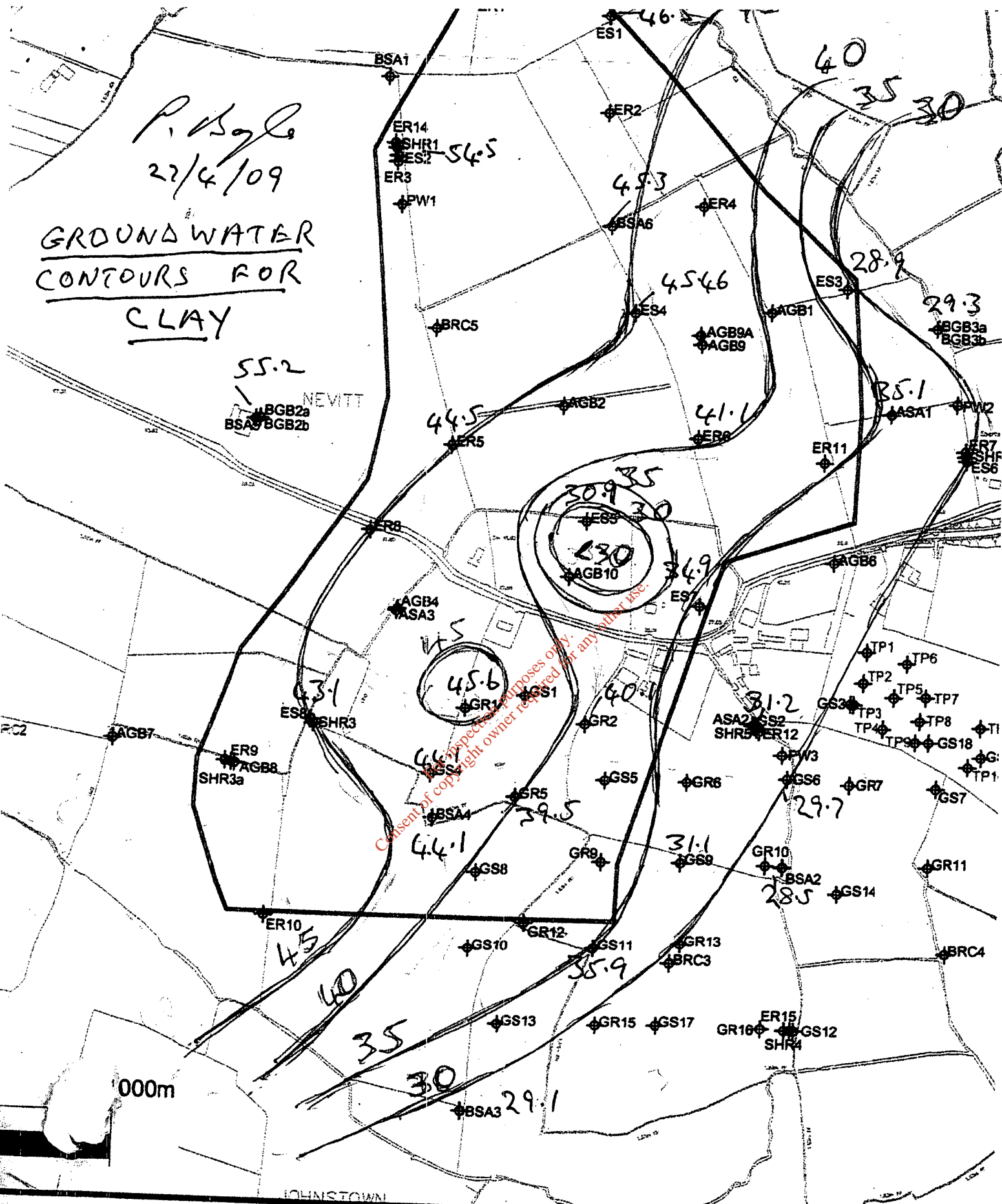
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P. Boyle
22/4/09

GROUND WATER
CONTOURS FOR
CLAY



NOTES

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2. All Levels refer to Ordnance Survey Datum, Malin Head.

RPS Consulting Engineers

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