Wednesday, 25 May 2016

Regarding environmental monitoring we have no confidence in the Applicants approach

In my written submission regarding environmental effects of water discharges I discussed the water sampling regime for Q6. The Applicant replied on pp 9-1 of the document *GREX _WED3_01 Applicants response to Written Submissions*

The Respondent has taken the "single sample" point out of context- a single sample was taken at each monitoring point at each sampling interval. A total of 12 sampling rounds have been undertaken for surface water sampling.

And

There is no evidence at present that there is contamination within the waters contained within the quarries

For the sake of clarity could the Applicant please make clear exactly what sampling has been done in Q6 and answer the following?

How many samples have been taken in the Q6 water body and when?

What volume were each of these samples.

What depths were each of these samples taken from?

What, if any, is each sample ID so we can identify them in the various analytical results tables?

Perhaps these tables can be signposted for us .. they are well hidden within the mound of documentation

As far as I can tell the data we have refers to very few samples taken at or just below the surface. Perhaps the lack of evidence of contamination is a measure of the inadequacy of the investigation.

If these samples do not cover the whole water column .. which I understand to be a maximum of 17.1m to the top of the slate pile (and of course it may well go down much deeper among the slate rubble) .. then can I ask why not? Given the known contents of this pit (see elsewhere in the discussion regarding munitions) then it would seem remarkably incurious of the applicant in ascertaining precisely the level of environmental risk associated with dewatering this pit (i.e. dumping it into the SSSI of Llyn Padarn) if a thorough scientific profiling exercise relating to the water body has not been carried out.

As pointed out by Mr John Harold of the Snowdonia Society at the recent hearings, the control of these discharges is likely to be regulated by NRW's permitting process and will essentially be one of self monitoring by the Applicant.

As you will read elsewhere in this representation we have little confidence in such self-regulation.

During the dewatering process the Applicant apparently intends to monitor discharge continuously for a few physical parameters… eg visual appearance, temperature conductivity, odour .. but subtle and potentially damaging contamination (including radioactivity) could easily go unnoticed , particularly if the chemical nature of water column is not fully understood in the first place.

When asked at the most recent hearings if there was any intention to use a batch monitoring arrangement whereby discharges were held in alternating segregated lagoons or holding tanks pending full analysis prior to discharge to local environment the clear answer from the Applicant was no, although as far as I know we have not had a decision yet from NRW regarding permitting conditions.

Given the uncertainties about the chemistry of this water body, this seems an obvious situation in which to take such a precautionary approach yet this does not appear to be happening.