

213-1
Sub 12 office

Ann Bosley / Tracey Berney

From: Noeleen Keavey
Sent: 03 March 2005 10:29
To: Ann Bosley / Tracey Berney
Subject: FW: Revised application from Roadstone Ltd. application for remediation waste



Letter to EPA re
objection 2nd...

Tracey

Could you look after this whenever you get a chance ?

Thanks a mill

Noeleen

-----Original Message-----

From: Wexford Receptionist
Sent: 03 March 2005 10:26
To: Noeleen Keavey
Cc: infomail
Subject: FW: Revised application from Roadstone Ltd. application for remediation waste

Rec'd today Noeleen.

Tks Ann.

-----Original Message-----

From: Laura Breen [mailto:Laura.Breen@amch.ie]
Sent: 03 March 2005 09:54
To: 'info@epa.ie'
Subject: Revised application from Roadstone Ltd. application for remediation waste

To whom it may concern,

Please find attached a letter of objection concerning the above mentioned submission.

I look forward to hearing from you,

Regards,

Laura Breen B.Sc., M.Phil., MIOSH

<<Letter to EPA re objection 2nd app 030305.doc>>

The information transmitted is intended only for the addressee and may contain confidential and/or privileged information. Any review, retransmission, dissemination or other use of or taking any action in reliance upon this information by persons or entities other than the intended recipient is prohibited and may be unlawful. Please note that any views, advice or opinions contained in this communication are those of the sending individual and not necessarily those of the hospital. If you received this in error please advise the sender and return it to the address above and delete the material from any computer. Please note that electronic mail, to, from, or within the hospital, may from time to time be the subject of a request under the Freedom of Information Act.

This email has been scanned by the MessageLabs Email Security System.
For more information please visit <http://www.messagelabs.com/email>

213-1
Sub 12.

18 Woodleigh Ave.,
Blessington,
County Wicklow,
Ireland.

3rd March 2005

Environmental Protection Agency,
Licensing and Control Section (Waste),
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

**Re: Objection to Roadstone Ltd. Remediation Waste Licence,
Blessington, Co. Wicklow**

To whom it may concern,

A letter similar to the content below was sent to the EPA on the 9th of February regarding Roadstone Ltd. application for a Remediation Waste Licence (ref 213-1). We are now led to believe that a second application has been made since and that our previous letter of objection is no longer valid. We therefore request that this letter be considered under the revised application in addition to letters that may have also been submitted by Woodleigh residents previously.

This letter is being submitted by a residents committee on behalf of 158 residents in Woodleigh Estate, Blessington, Co. Wicklow.

We have reviewed the Environmental Impact Statement (EIS) submitted by Roadstone Ltd. for consideration as part of their remediation licence of unauthorised landfill sites at Blessington. We wish raise the following objections:

1. The proposed site for the engineered landfill is situated over a sand and gravel aquifer. This aquifer is a source of water supply for a number of residents in Blessington and we have concerns that this could be polluted. Such a licence should not be granted, as planning permission would not be awarded under these circumstances if it were sought. As indicated in section 4.4 of the EIS, *'the baseline study of surface water quality indicated naturally elevated manganese and barium as well a number of other contaminants at concentrations higher than would be acceptable in groundwater'*.

Section 2.6.4. of the County Development Plan under the heading of 'Waste, Effluent and Emission Control' states that it will have regard to section 38(1) of the Waste Management Act and *'provide or operate, or arrange for the provision and operation of such facilities as may arise for the recovery and disposal of household waste arising within its functional area'*. This waste licence proposal would then contradict

the Council's role in the Development Plan to *'protect existing groundwater aquifers, surface waters and coastal waters from pollution'*.

As mentioned in section 1.5.1 of the EIS, the Geological Survey of Ireland (GSI) confirmed that the relevant risk response category for the site of the proposed landfill facility is R3 meaning that a landfill is not generally acceptable unless the ground water in the aquifer is confined or there will be no significant impact on the ground water and it is not practicable to find a site in a lower risk area. In this instance, the aquifer is not confined. There is always a risk of impact on the ground water and barrier mechanisms can breakdown and leachate can escape. Given that there are no guarantees, the landfill site is not acceptable.

2. The residents of Woodleigh have been and are still exposed to the nuisance of landfill gas emissions. Some of the properties in the estate are currently less than 20 meters from the illegal dump, thus contravening the Department of Environment 1994 publication 'Protection of New Buildings and Occupants from Landfill Gas' which states that no residential building should be within 250m of a landfill site (as shown on the Prime Time programme on the 7th of October 2004). As mentioned in section 4.5 of the EIS, *'gas monitoring results for the three existing unauthorised landfill sites show levels of methane and carbon dioxide above DOE guidance values of 1% v/v methane and 0.5% v/v carbon dioxide for proposed housing sites'*. There is also evidence of horizontal migration of gas currently (section 7.2.2.3).

During the proposed excavation, segregation, recycling and removal of the illegal waste, Woodleigh residents will be further exposed to new nuisances of dust, odour leachate, vermin, wind-blown litter and noise. As mentioned in section 4.5 of the EIS, there would be *'a significant short-term odour impact for residents in the Woodleigh development'*. Being exposed to a long-term nuisance is immoral, and illegal let alone aggravating the situation further. If the waste was excavated, segregated and removed from the site immediately, it would do away with need to segregate, recycle and transfer the waste, thus decreasing the nuisance factor.

3. The principal of risk management is to eliminate the hazard in the first instance, only when this cannot be done, should you implement mitigation measures. In this instance, the EPA should be insisting the illegal waste is removed offsite to an existing licenced landfill facility. Section 1.5.4 discusses Wicklow County Councils policy with regard to remediation waste licences of unauthorised landfill sites and states that it could involve *'removal of waste fractions to authorised facilities for disposal, processing or reuse'*.
4. While Roadstone Ltd. claim that they will not expand the proposed landfill facility in the future, we cannot take their word for it. This would also be seen to set a precedent and as such should not be rewarded.
5. We would also question when this EIS was prepared. Some parts of the EIS refer to Woodleigh as a housing area *'currently under construction'* (e.g. section 3.2.7)

whereas in other areas, it is referred to as a recent new development. This demonstrates that the EIS is not current and we would therefore question its validity.

6. Blessington is generally regarded as a desirable place to live and this should not be compromised by a landfill facility.
7. Roadstone Ltd. has highlighted the fact that each County Council must dispose of the waste it creates in accordance with the 'proximity principal'. Surely this is a matter for the EPA or Wicklow County Council to decide on. Roadstone Ltd. also claim that there is no licenced facility within an 80km of the application site that could accept the waste (section 1.7.1). This should be for the EPA to investigate and decide on. The Ballynagran licenced landfill facility in East Wicklow appears to be able to accept this illegal waste but Roadstone Ltd. have discounted it as an option because it is 'uncertain' if they could accept the waste. Again, this is not Roadstone Ltd. concern, but a matter for the EPA and/or Wicklow County Council to decide on. Their argument in this section of the EIS is very weak.

Finally, the EPA should not reward illegal dumping by legalising it and its' locations should not be dictated by illegal dumpers.

If it appears that a licenced facility could accept the waste, this avenue should be explored in the first instance rather than granting a remediation licence. Not only would it completely eliminate the hazard, but would prove to be an immediate resolution to this issue, one which we as residents have had to put up with long enough.

We trust this will receive the appropriate attention. We look forward to hearing from you.

Yours faithfully,

Laura Breen
Alison Doyle
Kevin Coburn
Kate Martin

For inspection purposes only.
Consent of copyright owner required for any other use.