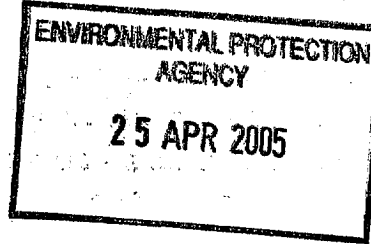


213-1

Sub (21)

Ave Maria,
Crosscoolharbour,
Blessington,
Co. Wicklow,



6th April 2005

Dear Sir;

Objection to application for a Waste licence by Roadstone Dublin Ltd.

I write to object to the application by Roadstone Dublin Ltd. to the E.P.A. for a waste licence to re-distribute illegally dumped waste within their lands; removing only a very small proportion of that waste off-site. My objections are:

1. The original Environmental Impact Statement (JBA2901-10/EIS/dl/tp), and thereby the thrust of Roadstone's application, envisage that the redistributed waste totaled ca. 110,000 tons and could, therefore, be contained within a single facility on site. All of the documentation, and the entire impact assessment were predicated on that basis. In JBA2901-10/EIS/dl/tp (page 1/1) Roadstone allow that Wicklow County Council's investigation suggested that 115,500 tons of waste were on site. However, Roadstone's site notice makes clear that the volumes of waste involved are significantly larger than either of these figures, totaling 300,000 tons. The estimate for construction and demolition (C&D) waste on the site notice has doubled to 120,000 tons and the estimate for domestic, commercial and industrial (DCI) wastes has increased over 3.5 fold to 180,000 tons. *I therefore object on the basis that I believe that it is unreasonable to assume that best practice for this very much larger waste volume remains the same as for the smaller volume originally described. I also object on the grounds that it is entirely unreasonable to assume that the original Environmental Impact Statement remains valid for this much larger waste volume.*
2. The fact that an additional 190,000 tons of waste have been involved in the redistribution plan suggests that there is little knowledge of what volumes of waste are present on Roadstone's land and that yet more material may be present than is currently known-about. If on-

site storage for any of the declared waste is agreed then it will be much more difficult to argue that any further material, no matter what its quantity or quality, should not also remain on site. Effectively, therefore, an illegal dump, would by this process, be turned into a legal one, and one of undefined composition. *Therefore, I object on the grounds that the information presented on the amounts of waste present are seriously deficient, indeed misleading.*

3. If the extra 190,000 tons of waste have been recently discovered then it is likely that the detailed composition of the waste present is not as adequately, or comprehensively, described as is suggested by Roadstone's application. Therefore, the plans put forward by Roadstone in relation to assessment of the material concerned, its segregation, treatment, on-site storage and limited off-site disposal are unconvincing and, quite possibly, deficient. *So, I object on the grounds that the information presented on the types of waste present are likely to be seriously deficient and therefore the processes involved in its segregation, treatment and storage are not sufficiently detailed or well articulated.*
4. If, on the other hand, the extra 190,000 tons of waste has been known about for some time, then this, discounting both bad faith and incompetence on the part of Roadstone, suggests that the company would welcome an adequate and inclusive consultation process predicated on this new information: such a process has not yet occurred. *So, I object on the basis that the process of consultation has not been inclusive or adequate.*
5. Roadstone's Environmental Impact Statement (EIS) states that 'no importation of waste will be permitted under any circumstances'. However, if such an application were to be made then it is difficult to envisage what the grounds for its refusal could be if other waste is supposedly stored safely on-site. Therefore, approval of Roadstone's application opens-up the strong possibility of the dump being legalized and new waste being imported. *I, therefore, object on the grounds that this application will make it almost impossible to deny Roadstone, or some successor company, permission to operate a legal land-fill/dump on the lands concerned.*

6. Roadstone's EIS is deficient in a number of technical aspects e.g. its consideration of HCV traffic flows, the proposed volume of the engineered landfill, leachate management, storage or treatment etc.. *I therefore object to the application on the grounds that Roadstone's EIS is deficient in a number of ways of this type.*

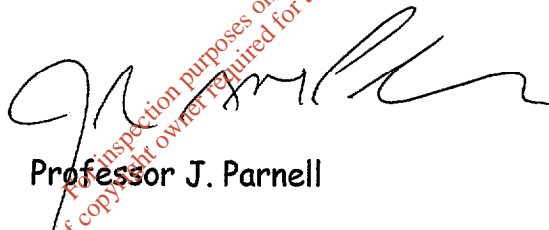
7. Roadstone's EIS points out that some contamination already appears to have occurred in respect of groundwater in the vicinity of the buried waste and that surface water is also contaminated. Roadstone's EIS states that 'modelling suggests levels of contaminants leaking through the base and the volume of flow will be too low to effect the River Burgage or groundwater in Blessington village.' This suggests that leakage will occur, that the potential is present for the contamination of drinking water for Dublin City and that the risk to local groundwater supplies remains. Furthermore, section 6.4.6 presumably deals with modeling of leachate based on the original and smaller volume of waste. It is now clear that there are uncertainties in terms of waste volume and in relation to waste composition. Roadstone's EIS also points out that breakthrough of certain contaminants will occur. I contend that the extra volume of waste and the uncertainties in its composition have the potential to significantly affect these projections. In addition, it is stated by Roadstone in their application, that the initial rounds of surface and groundwater measurements did not include temperature measurements, as recommended by the EPA Landfill Monitoring Manual; nor was residue on evaporation measured thereby suggesting that these original data, on which some of Roadstone's application rests are flawed. There is no evidence whatsoever presented that Roadstone's proposed on-site holding facility will, in the long term, adequately protect the integrity of the underlying aquifer - the evidence is suggestive that it might, but it is far from conclusive that it will. *Therefore, on the basis of the precautionary principle I object to Roadstone's plans as I believe there is a real risk to the integrity and purity of various water supplies.*

8. Roadstone's EIS does not adequately deal with realistic combinations of alternatives to re-distribution on site. The 3 options mentioned are

all considered separately, and are not exhaustive. Indeed, Roadstone's solution and assessment do not appear to adequately balance reasonable cost with best practice. Although the EIS gives the impression that Roadstone have not allowed capital or other expenditure to limit their consideration of available options it is clear that in fact they have. *Therefore, I object to Roadstone's plans on the basis that all reasonable options and combinations of options have not been considered.*

9. Roadstone's EIS does not adequately deal with the integrity or composition of the wildlife of the site, nor, given the extra volumes involved, does it deal with the extra impact likely to be caused. It also makes mention of a planting scheme: however, no details of the scheme or species involved are given. *Therefore, I object to Roadstone's plans on the basis that the impact on wildlife is inadequately dealt with.*

Yours faithfully,



Professor J. Parnell

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