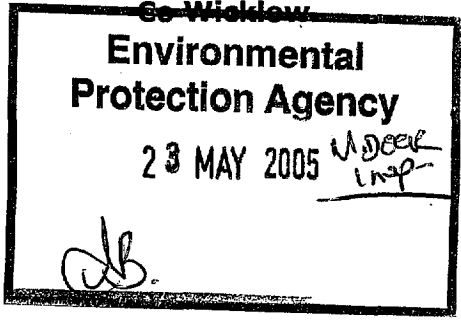


Sub (22)

WOW Committee,
c/o 5 Woodleigh Way,
Blessington,
Co. Wicklow



EPA Headquarters
PO Box 3000
Johnstown Castle Estate
Co. Wexford

Cc : Minister Dick Roche

Re : Application reference 213-1 Roadstone application for remediation landfill – Co. Wicklow.

To Whom It May Concern:

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

Please find enclosed copy of correspondence from TMS ltd dated 23 Feb 2005. As residents from Woodleigh we were concerned with the findings from this letter and felt it necessary to forward a copy to you in reference to the above-mentioned application. We have highlighted the areas that are of greatest concern to the residents and would urge you to consider the findings in relation to processing the application.

There are 8 points underlined in the report that we believe to be pertinent to this application. Residents expressed specific concern about the following comments in the report:

- “Results are questionable and therefore unreliable”
- “Extremely difficult to interpret”
- “Some results are impossible”

We also have concerns that Wicklow county council has done “no monitoring themselves”. We respectfully request that you liaise with Wicklow county council about any monitoring results that they may have carried out to date. Could you also confirm if the EPA have compiled any monitoring data on air/water/gas emissions from the illegal dumps on Roadstones Blessington lands themselves.

We believe that a full report will be available by 6th May and we will send on a copy to you with our comments in due course. Can we also refer you to the recent circular from the Minister for the environment in relation to the Policy guidance pursuant to section 60 of the waste management Act 1996. We would request some assurance that these policy additions will be taken into consideration, specifically given that we are living in such a close proximity to the illegal dumps.

Finally we as residents are concerned that the EPA will make its decision regarding this application based on Roadstones monitoring data only. Such a decision should be made on the basis on of independent data based on the recommendations of the attached report or data from Wicklow County Council or monitoring data obtained by yourselves.

We would appreciate a response to the questions raised above and look forward to your response,

Best Regards,

W.O.W Committee – representing Woodleigh Residents.
Alison Doyle, Kate Martin, Laura Breen, Kevin Coburn.

Please send any responses to the following Address:
5 Woodleigh Way,
Blessington, Co Wicklow.

ATTN.

KATE.

Mr. Stephen Bray,
Secretary,
Environment and Heritage Committee,
Blessington & District Forum,
22 Deerpark Walk,
Blessington,
Co. Wicklow.

23rd February 2005

Re: Blessington & District Forum (B&DF)
Our Ref. 8236

Dear Mr. Bray,

(1) We have completed our assessment of available monitoring data for the Roadstone Dublin Ltd., Blessington site and in summary, have concluded that there are a number of significant anomalies contained within the received data sets for groundwater, leachate and surface water monitoring. To date we have received water quality monitoring data compiled by John Barnett & Associates (the consultants acting for CRH) which relate to quarterly monitoring conducted at various intervals between 2003 and Quarter #4 of 2004. We have not yet received the results of monitoring conducted by Wicklow County Council who were last contacted by this office on 4th February 2005, when we were advised that they were waiting for data from John Barnett & Associates. We interpret this to mean that Wicklow County Council have done no monitoring themselves. As noted previously we have received no recent data for landfill gas monitoring in the gas monitoring wells but some data was received for the landfill gas vent pipes.

(3) Our review of monitoring data received to-date demonstrates, in our opinion, that a number of the reported analytical results are questionable and therefore unreliable, and (2) other data is extremely difficult to interpret in the context of the broader data sets provided. Furthermore, there are analyses which have never been undertaken which in our opinion should be completed in order to conduct a reliable assessment. In order for TMS Environment Ltd. to accurately evaluate the actual impact that the landfill site has on the receiving environment, and to allow us to advise Blessington & District Forum on the issues relating to this site, we propose to complete independent monitoring at the site. The purpose of this monitoring is as follows: (4)

- To acquire a complete data set of relevant monitoring data from an independent organisation;
- To acquire data which will allow us to rationalize anomalous data presented in the CRH Consultants reports;
- To acquire data on substances and parameters which are relevant to the assessments but which have not been reported previously;
- To acquire recent landfill gas data from off-site as well as on-site locations so that an evaluation of current risks from landfill gas may be completed;
- To allow a reliable evaluation of the CRH proposals for remediation.

In the first instance, we have prepared a Work Programme which will allow us to complete a reliable assessment of groundwater, surface water, leachate and landfill gas at the established monitoring locations at and in the vicinity of the site. Following the completion of the proposed independent monitoring programme, all monitoring results may then be used to reliably assess the impacts on the receiving environment in the vicinity of the subject site. The report will allow us to advise B&DF on the environmental aspects of the CRH remediation proposal. In particular, this report will seek to rationalize the significant number of anomalies in the data presented by the CRH Consultants; if the report identifies further requirements to rationalize outstanding anomalies, a detailed series of recommendations will be included. The expected outcome of this monitoring and investigation programme would be a definitive evaluation of the potential impacts of the CRH proposal and advice on whether the B&DF should support or oppose the proposed remediation scheme.

As mentioned previously, it is currently my opinion that there are too many anomalies in the information publicly presented in the EIS and the Waste Licence Application to allow me to support the Application as it stands. I am concerned in particular with the following aspects of the data

- (5) 1. ~~There is no recent landfill gas data although a report from Parkman in 2003 stated that levels were high enough to present a risk to the houses located near Area #6. I cannot therefore form any opinion on whether the proposed remediation scheme is acceptable in terms of the safety and environmental hazards which local residents, and their properties, would be exposed to.~~
- (6) 2. ~~The available water quality data (surface water and groundwater) shows significant anomalies with very high levels of pollutants detected in one Quarterly monitoring Event and levels below detection limits in the following event. This is an exceptionally difficult pattern to explain and it is my opinion that one of the data sets may be inaccurate. Similar trends have been observed for a number of parameters which suggest that the data may be unreliable.~~
- (7) 3. Other inexplicable data patterns are also observed eg levels of chromium below detection limit for three quarterly events, a very high results, and then levels back to below detection limit again.

(8)

4. Some results are impossible. For example the recent data set we received reports several results for pH at zero '0'. This is of course theoretically and practically impossible and indicates a problem with analysis, data recording and interpretation. Other patterns of unreliable results include inconsistent ratios of COD or TOC to levels of PAHS and other organic substances, incomplete ionic balances, and inexplicable results for some parameters in what is supposed to be groundwater.

There are also other difficulties with some of the analytical data and I therefore must recommend strongly that we acquire an independent data set for evaluation. The entire remediation scheme has been designed on the basis of interpretation of the data and, as noted above, since the data is unreliable, it is also possible that the proposed remediation scheme is also unreliable.

The attached Appendix details a proposed work programme together with a fee proposal for the completion of the works. I suggest that the proposal (perhaps not this letter, although that is of course your own decision) should be forwarded to CRH before we complete any further work. I have also included a fee rate for Consultants who will work on the programme on your behalf - this is an hourly rate for consultants working outside fixed-fee agreements, attendance at Public Meetings etc.

Should you require any additional information relating to the above, please do not hesitate to contact me.

Yours sincerely

cc Ian Bagna
Dr. Imelda Shanahan

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