

Fingal County Council Comhairle Contae Fhine Gall



To: Mr Joe Reilly, Programme Officer,
Office of Climate, Licensing & Resource Use,
EPA,
Headquarters, PO Box 3000,
Johnstown Castle Estate,
Co. Wexford

14/03/2011

Dear Sirs

Re: Waste Licence Application W0272-01 - Milverton Waste
Recovery Facility

We refer to your letter of 15th February 2011 concerning additional information received by the EPA on the above Waste Licence Application. Please find comments below on this additional information.

Note: These comments are made *only* on the additional information relevant to the EIS passed on to FCC by the EPA.

- 1) There is no mention of the Water Framework Directive (WFD) and the Eastern River Basin Management Plan and Programme of Measures (POMs). The Mill stream has been designated as having Good Status. Under the WFD all waters must be good status by 2015 unless agreed otherwise and no waters may deteriorate below their existing status.
- 2) Referring to the EIS Section 6 Revision A, Subsection 6.2.3, paragraphs headed *Surface Water Flows and Discharges*: the figures taken from the flow report are based on the full catchment, whereas the discharge is to a tributary only. The figures used in Table E.1(i) are different. There appears to be no reason given for the different figures.
- 3) Referring to the EIS Section 6 Revision A, Subsection 6.2.3, paragraphs headed *Surface Water Flows and Discharges*: the rate, timing and volume of discharge from the sump in the quarry floor appears to be controlled by the pump and not the precipitation patterns over the quarry footprint.
- 4) Referring to the EIS Section 6 Revision A, Subsection 6.3.4, first paragraph: see comments 1 & 2 above with regard to flow figures.

Water is precious. Let's conserve it. - Tá uisce luachmhar. Caomhnáimís é.



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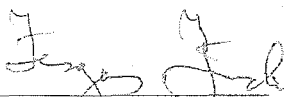
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- 5) Referring to the EIS Section 6 Revision A, Subsection 6.4.1: We suggest the following additional mitigation measures
- All paved and car parking areas to drain to an oil interceptor.
 - All 'site compound' areas to have impermeable surfaces and drain to an oil interceptor.
 - All plant when not in use to be parked in 'site compound' areas.
 - Oil interceptor to be maintained in accordance with manufacturers recommendations.
 - Settlement ponds to be maintained in a fit - for - purpose state.
- 6) The applicant should be asked for his proposals to ensure that there is not a wash out from the settlement ponds during periods of heavy rainfall.
- 7) The proposals for surface water discharge from the site during operation of the site should include a stormwater management system following the principles of Sustainable Urban Drainage and in compliance with the principles outlined in the "Greater Dublin Strategic Drainage Study Regional Drainage Policies Volume 2 New Development, Aug 2005".
- 8) Referring to the EIS Revision A, Attachment F4: Monitoring point SW2 appears to be in private property. Evidence of permission to sample at this point over a prolonged period should be submitted.
- 9) Monitoring point SW2 appears to be at the discharge point. Should it be a distance downstream to allow for a mixing zone?
- 10) Referring to the EIS Revision A, Attachment F6: The above comment 8 may apply here also, however the location of the existing groundwater wells is not included in the additional information.
- 11) Referring to the EIS Revision A, Table E1.(i) "Flow rate in receiving waters": These figures are different to those in EIS Section 6 Revision A, Subsection 6.2.3, paragraphs headed *Surface Water Flows and Discharge*. The reason for the difference does not appear to be mentioned in the additional information.
- 12) Referring to the EIS Revision A, Table E1.(i) "Available waste assimilative capacity": Table E1.(i) refers to Table E.1 (ii) however there is no mention of assimilative capacity in Table E.1(ii).
- 13) Referring to the EIS Revision A, Table E1.(i) Emission Details: Are these figures based on rainfall or on pump ratings? (See comment 3)

- 14) Referring to the EIS Revision A, Table E1.(ii): The physico-chemical conditions of river water bodies to meet 'Good Status' are set out in S.I. No. 272 of 2009 "European Communities Environmental Objectives (Surface Water) Regulations 2009". In the absence of definite assimilative capacity figures in the tributary, lack of SUDs proposals, and the requirements under the Surface Water Regs and the WFD, it is felt the proposed discharge levels are too high and it is recommended that a limit of 10mg/l for both BOD and SS be applied in the interim. Limits for total ammonia and MRP should also be applied to ensure that the quality of the receiving waters is not adversely affected.
- 15) Discharges to streams, watercourses or soakaways must receive permission from Water Services.
- 16) There must be no discharge of suspended solids or any deleterious matter to watercourses.
- 17) Site roads and approaches to river crossings must be regularly brushed or scraped and kept free from dust and mud deposits.
- 18) Suitably sized oil and petrol interceptors are required for all discharges from large carparks, access roads and hard surfaced areas.
- 19) There is no mention of foul sewage and disposal of same in the additional information submitted. What are the proposals for disposal of foul sewage and should the affects of same be considered in the Groundwater Protection section.

Yours Sincerely,



Fergus Finch, A/S.E.E.,
Pollution Control Section

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