

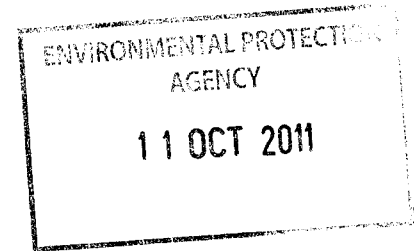


Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

HSE South,
Wexford Local Health Office,
Environmental Health Service,
Whitemill Industrial Estate,
Wexford.

Telephone 353 53 9123522
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Ms. Grainne Oglesby, Programme Officer,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency
Headquarters,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford



3rd October 2011

RE: Waste Management Licensing

Waste Licence Application, in accordance with Article 18(2) of the Waste Management (Licensing) Regulations, as of 12 August 2011.

Application Register No: **W0280-01**

Applicant Name and Address:

Roadstone Wood Limited, Fortnestown, Tallaght, Dublin 24

Facility:

**Brownswood Inert Waste Recovery Facility, Brownswood,
Enniscorthy, County Wexford**

Dear Ms. Oglesby,

Please find enclosed the Health Service Executive consultation report in relation to the above application.

If you have any queries regarding any of these reports, the initial contact is Matt Grogan Principal Environmental Health Officer who will refer to an appropriate person in the responsible department.

The following Health Service Executive departments were made aware of the consultation request for the proposed development on 16th August 2011:
Emergency Planning, Health Protection, Regional Director of Operations (South) and Estates.

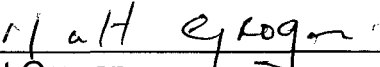
The Environmental Health Service response to the proposal is in the attached consultation report.

- The assessment is based on an assessment of documentation submitted to this office on 16th August 2011.



- A site visit was conducted on 31st August 2011.
- Environmental Health were not included at the Screening / Scoping stage of this application
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- This report refers only to those sections of the documents which are relevant to the Health Service Executive.

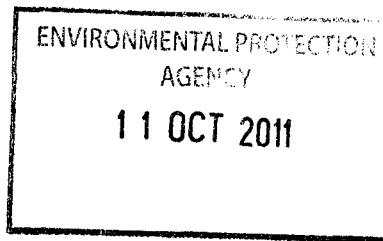
Yours sincerely



Matt Grogan
Principal Environmental Health Officer

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Matt Grogan Principal Environmental Health Officer at the above address.

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ENVIRONMENTAL HEALTH SERVICE CONSULTATION REPORT

REPORT TO: Matt Grogan, Principal Environmental Health Officer

TYPE OF CONSULTATION: **WASTE MANAGEMENT LICENSING**
Details of Waste Licence Application, in accordance with Article 18(2) of the Waste Management (Licensing) Regulations, as of 12 August 2011.

APPLICATION REFERENCE/ REGISTER NO.: WO280-01

APPLICANT NAME/ ADDRESS: Roadstone Wood Limited
Fortunestown
Tallaght
Dublin 24

NAME & LOCATION OF FACILITY/ PREMISES CONCERNED:
Brownswood Inert Waste Recovery Facility
Brownswood
Enniscorthy
County Wexford

This report only comments on Environmental Health (EH) impacts of the proposed inert waste recovery facility as outlined in the EIS.

The Health Service Executive (Environmental Health Department) has no objection in principle to the proposed waste recovery facility and recognises the positive impact on groundwater of the proposed backfilling of the existing open void to above ground water level.

Our main areas of concern and observations thereon are as follows:

MANAGEMENT and CONTROL:

To ensure that all waste material not meeting acceptance criteria is excluded from the area to be backfilled a comprehensive system of management and control must be drawn up and rigidly implemented.

The claim that the restoration of the site to agricultural use will improve protection of the underlying ground water resource (classified as "extremely vulnerable") is valid only to the extent that the restoration work is adequately controlled and maintained and monitored.

It is noted that, unlike the typical landfill facility receiving biodegradable waste, there is no provision in the proposal for landfill lining. Any contaminated waste will therefore directly impact on ground water quality. This factor underlines the absolute need for control at the facility.

Site security is an essential element of this control to eliminate the possibility of fly tipping and other illegal activity on site.

LIFE SPAN:

It is noted that the expected operational life of the facility will be 6.5 years but that this could extend to up to twenty years depending on changing circumstances. As the aquifer will remain vulnerable during the restoration period it is considered that a shorter life span for the restoration process is desirable.

GROUNDWATER:

It is noted that four ground water monitoring wells are located on this site. The monitoring regime is inadequate in that insufficient microbiological monitoring is being carried out. Monitoring should include, at a minimum, testing for total and faecal coliforms.

It is suggested that all private wells within 250 metres of the facility should be included in the monitoring programme.

It is noted that it is proposed, on completion, to direct surface water across the site to a pond in a closed depression to facilitate recharge to the ground water. This is undesirable as it would pose a hazard to water quality in the aquifer.

It is noted that there are two septic tanks serving facilities on site. These septic tanks and associated percolation systems should comply with current Environmental Protection Agency standards.

SURFACE WATER:

It is noted that treated surface water discharges to the river Slaney. Treatment and monitoring of surface water discharge must ensure that this does not have a negative impact on fish and aquaculture down stream of the discharge points.

CONTAMINATED LAND:

It is noted that there is an asphalt plant and a disused tar plant in the vicinity of the facility. Although not included in the area under consideration the potential for groundwater contamination should be considered. All potential locations of contaminated land must be assessed.

NOISE:

An appropriate condition should be imposed requiring the control of noise and specifying mitigation measures and appropriate levels for daytime and nighttime. It is noted that the proposed operating hours are from 06.00 to 18.00 which raises concern regarding commencement of operation during the "nighttime" period of 06.00 to 08.00. The question must be raised as to whether the facility can operate during this two hour period without exceeding the appropriate "nighttime" noise level.

AIR QUALITY:

Dust would be the main concern here. Adequate provision must be made for dust suppression.

In regard to dust monitoring, it is noted that the two existing dust monitoring stations are located to the north of the facility. It is suggested that additional monitoring stations may be appropriate.

PEST CONTROL:

The backfilling operation may disturb nesting sites for rodents and cause movement to other locations. It is essential that a comprehensive rodent control programme be carried out.

NUISANCE MONITORING:

Regular checks should be carried out to ensure that nuisance does not arise by way of litter, vemin, odour etc.

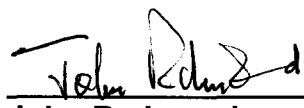
MONITORING and RECORDS:

It is essential that a comprehensive monitoring regime be carried out in relation to all of the above potential Environmental Health impacts and that adequate records be kept and available for inspection.

CONCLUSION:

While it is recognised that a properly managed and controlled facility will have a positive environmental health impact in respect of groundwater protection, lack of adequate controls will have the opposite effect.

SIGNED:



John Redmond
Senior Environmental Health Officer

DATE:

7/10/11