

APPENDIX D

RESPONSE TO PUBLIC CONSULTATION

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Blessington and District Forum

Blessington,
Co. Wicklow.

Mr. Mark Prendergast,
Roadstone Dublin Limited,
Fortunestown,
Tallaght,
Dublin 24.

12 October 2004

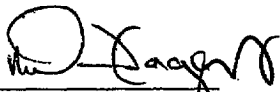
Dear Mr. Prendergast,

I acknowledge receipt of your letter dated 5 October 2004 together with enclosures relating to the consultation document on Remediation of Unauthorised Landfill Sites at Blessington, Co. Wicklow.

The documentation is presently being circulated amongst the forty eight members of the Blessington and District Forum and meetings are scheduled for next week of the town, rural, community and environmental sub-committees.

We note your deadline of 22 October 2004 for submissions but would advise that this date is too short a time for a full consideration of the document by the forty eight member body. It is expected to take until at least 15 November 2004 to formalise the local community response.

Yours sincerely,



Michael Sargent
Chairman

BLESSINGTON
QUESTIONS AND ANSWERS

1	Q	On reading the correspondence between yourselves and Wicklow County Council it appears that this plan is a done deal between Roadstone, EPA and Wicklow County Council. Can you confirm or deny this?
	PM	Wicklow County Council ("WCC") issued a Section 55 notice under the Waste Management Act instructing Roadstone Dublin Limited ("RDL") to submit details of its proposed remediation scheme to the Council, based on an Environmental Risk Assessment. RDL complied fully with this instruction. WCC have indicated that the proposed scheme is appropriate and have now issued a Section 55 notice requiring RDL to apply to the Environmental Protection Agency for a Remediation Waste License to implement the proposed scheme. We are proceeding on the basis of this notice under the Waste Management Act, 1996, which we must comply with. This notice was issued by WCC on July 7 th 2004.
2	Q.	Why can't all the waste be removed to a suitable site?
	PM	There is no licensed landfill available which has the capacity to take this material, without displacing its existing clients. In any event we believe that in all the circumstances our proposed site is suitable.
3	Q.	Where have Roadstone looked for suitable sites to place this waste?
	PM	Within 80 Km of the region – as most of the waste uncovered was apparently locally generated, the EU proximity principal applies. Hence a local solution is required.
4	Q.	Is it possible to locate a site outside Ireland?
	PM	It is not permitted to export non-hazardous waste from the state, only hazardous waste products may be exported to suitably licensed facilities abroad. In any event, the extraction and sorting of the waste would require a waste licence.
5	Q	Has anyone been reprimanded over the unauthorised dumping of waste on Roadstone's land?
	PM	We are informed that criminal charges have been made against a third party or parties.
6	Q.	Will Roadstone release all tests taken in relation to the unauthorised landfills to the forum?
	PM	All results have been submitted to WCC and the EPA and we understand are available to the public from them. RDL will release the results to the Forum under separate cover and they will be included in the Waste License application.
7	Q.	If not, why?
	PM	N/A

8	Q.	What are the ground conditions (geological and hydrological) below the proposed landfill? (i.e. the permeability, water table depth, stratigraphy, etc.)?
	PM	All this information will be included in the Environmental Impact Statement ("EIS") attached to the Waste Licence application – see 6 above..
9	Q.	Can this committee get a copy of any reports Roadstone may have in relation to geology of the area around the proposed landfill?
	PM	All this information will be included in the EIS – see 6 above.
10	Q.	What is the full capacity of the proposed landfill in cubic metres?
	PM	175,000
11	Q	Do Roadstone understand the potential environmental consequences in relation to siting a landfill in the area and the possible health effects that may follow?
	PM	Yes. This is addressed in the Environmental Risk Assessment and further in the EIS and Waste Licence application.
12	Q.	Do Roadstone intend to hold a public meeting to explain to the people of Blessington what these proposals are? If not, why?
	PM	Public consultations are ongoing with Forum and other local and national bodies.
13	Q.	Do Roadstone appreciate that the public perception is that siting a landfill in this area is rewarding the practice of unauthorised dumping of waste?¹
	PM	There will be no financial reward from the licensing of the remediation plan. RDL has never made any gain from this activity and indeed has paid for all of its own and the council's investigation costs to date. The waste license is for remediation only – and in fact it will cost millions to remediate the site. RDL will never open a commercial or municipal landfill on this site and so will never generate revenue from this proposal.



Eastern Regional Fisheries Board
Bord Iascaigh Réigiúnach an Oirthir



Department of the Environment,
Heritage and Local Government
Our Natural Heritage

Mr. Mark Prendergast,
Roadstone Dublin Ltd.,
Fortunestown,
Tallaght,
Dublin 24

Your Reference:
Our Reference: GH/DD/1

November 1, 2004

**Re: Roadstone Dublin Ltd, Consultation Document on Remediation of
Unauthorised Landfill at Blessington.**

Dear Mr. Prendergast,

I refer to the consultation document issued in respect of remediation proposed for the unauthorised landfill at Blessington.

We welcome the proposal, therefore our observations are on issues which require clarification and which can be addressed in the E.I.S and in the Waste Licence.

4 Remediation Scheme

4.1 Principal Elements

- I. *Removal of the 'perched water' from boreholes to an approved wastewater treatment facility.*

The treatment facility should be identified and the impact of the loading from the landfill assessed.

- II. *Construction of the sumps.*

These should be appropriately designed lined structures which will contain the Leachate.

4.2 Waste Removal

4.1 Excavation of Buried Waste

The Eastern Regional
Fisheries Board

Construction of a 3m to 5m high berm to screen the activity.

Drainage from this should be incorporated in the Surface Water Management Scheme.

4.3 Remediation Landfill

4.3.7 Basal and Side Slope Liner Design

Construction Quality Assurance

The Construction Quality Assurance Scheme should be a condition of the Waste Licence and should relate to all stages of the remediation from liner installation to final restoration.

4.3.8 Leachate Management System.

The Leachate extraction wells must be properly designed, lined structures capable of containing the Leachate.

Stand-by pumps should be provided.

A telemetry system should be incorporated to alert personnel in the event of pump malfunction etc.

An estimate of the volume to be generated and the impact on the Wastewater Treatment facility. // AJ

4.4 Site Infrastructure

4.4.3 Hardstanding Areas

The hardstanding area at Area 1 should be subject to a petrol/oil interceptor, while the drainage from Area 4 should be regarded as Leachate and treated appropriately. //

4.4.6 Waste Inspection and Quarantine Area

To minimize Leachate volume it is preferable that this area is enclosed. Regardless it will be necessary to provide a properly designed Leachate storage facility here.

4.4.7 Sewerage and Surface Water Drainage Infrastructure.

It is imperative that the surface water drainage infrastructure is put in place before any works commence.

It is unclear from the text and Figure 5 the final discharge point of the surface water system, this requires clarification.

4.6 Environmental Monitoring

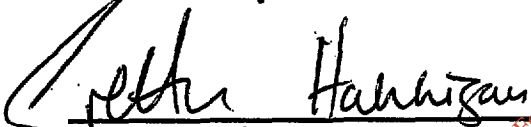
We suggest that this should be extended to include Biological Assessment of the Surface Water and that periodic biological monitoring should be included in the Waste Licence.

4.7 Restoration and Aftercare

The placing of dried out silt at and around each site, profiled to give a domed shape to facilitate surface water run off should be operated via the surface water management system, subject to settlement and therefore not impact on surrounding watercourses.

We may have further comments on receipt of the E.I.S.

Yours faithfully



Gretta Hannigan

Senior Fisheries Environmental Officer – Dublin District

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Prendergast Mark

From: Martin Pat
Sent: 18 October 2004 11:28
To: Prendergast Mark
Subject: FW: Wicklow Uplands Council/Blesington

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

From: Colin Murphy [mailto:cmurphy@wicklowuplands.ie]
Sent: 15 October 2004 12:41
To: Martin Pat
Cc: Dermot Hand; David Rowe; Sean Byrne; Philip Maguire; Richard More-O'Ferrall; Gay Needham
Subject: Re: Wicklow Uplands Council/Blesington

Dear Pat

Thank you for meeting with us on Tuesday and for taking a care of the room. We found your presentation most instructive and have conveyed its main points to our board members. We also intend to ask Blessington Forum and Frank Corcoran to brief us, subsequent to which we will be back to you. If there is anything else you want to let us know about, please get in touch.

Kind regards
Colin

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18/10/2004



AN ROINN COMHSHAOL, OIÐHREACHTA AGUS RIALTAIS ÁITIÚIL

DEPARTMENT OF THE ENVIRONMENT, HERITAGE
AND LOCAL GOVERNMENT

8 October 2004

Our Ref: G2004/455

Mr. Mark Prendergast,
Roadstone Dublin Ltd.,
Fortunestown,
Tallaght,
Dublin 24

Re: Remediation of Unauthorised Landfill Sites at Blessington, Co. Wicklow

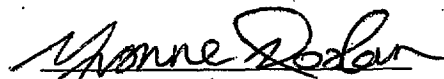
A Chara,

I wish to acknowledge receipt of your recent enquiry in relation to the above.

Your enquiry has been allocated the above reference number which should be used in all correspondence with the Department of the Environment, Heritage and Local Government. In addition your enquiry has been circulated to a number of relevant individuals/Divisions within this Department for their comments and we will revert to you in due course.

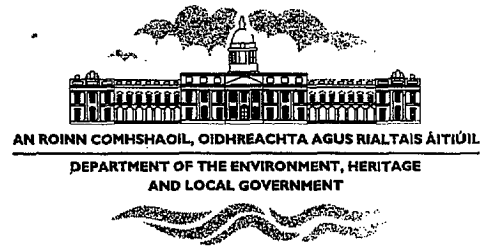
If you need any further assistance please contact the undersigned.

Mise le meas,


Yvonne Doolan,
Development Applications Unit,



21st October 2004



Our Ref.: G2004/455

Mr Mark Prendergast,
Roadstone Dublin Ltd,
Fortunestown,
Tallaght,
Dublin 24

Re: Remediation of Unauthorised Landfill Sites at Blessington, County Wicklow

Dear Mr Prendergast,

We refer again to your letter of the 5th October 2004 in relation to the above query and document. Outlined below are the nature conservation comments/recommendations of the Department of the Environment, Heritage and Local Government.

It is stated in paragraph 4.5 Environmental Nuisance Control that "the Waste Licence Application and Environmental Impact Statement will provide details of environmental controls for the following nuisances associated with the excavation, transfer and disposal of DCI waste" (I) Scavenging birds

Nearby Blessington Lake is an important winter roost for a number of gull species. Large numbers of gulls, upwards of 2000, can be found on the lake and feeding on the surrounding area in winter. Gulls are a common scavenger of dumps and so these may cause a problem, depending on the timing of the works and amount of domestic waste contained in the DCI waste. This Department would like to see details of the proposed controls if scavenging birds are a problem.

In paragraph 5 Environmental Impacts of Remediation Scheme, subheading (ii) Flora and Fauna we would like to bring to your attention that Peregrine Falcon have been known to breed in these sand pits. These are afforded protection under Annex I of the EU Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds). In 2002 peregrines bred on the face of a sandbank within 200m of the boundary around Area 4. Two young fledged from this site. With the amount of activity that will be around Area 4 these birds are unlikely to breed here during the intended works. Mitigating measures such as the construction of a nest platform elsewhere on the site is advised.

If you have any further queries in relation to the above please do not hesitate to contact the undersigned.

Yours sincerely,

Helen Francis,
Development Applications Unit



South Western Area Health Board
Operations
Oak House
Limetree Avenue
Millennium Park
Naas
Co. Kildare

Tel: 045 880 400
Lo-call: 1890 737 343
Fax: 1800 200 738

**Mr. Mark Prendergast,
Roadstone Dublin Ltd.,
Fortunestown,
Tallaght,
Dublin 24.**

20th October 2004

Re: Consultation Document on Remediation of unauthorised Landfill Sites at Blessington, Co. Wicklow. Roadstone Dublin Ltd. October 2004.

Dear Sir,

With reference to the letter and consultation document dated October 2004 received from Roadstone Dublin Ltd., sent to Mr. Martin Rogan, Assistant Chief Executive, South Western Area Health Board for observations and comment.

The South Western Area Health Board is grateful for the opportunity to comment on this document and to request that it be included in any future correspondence on this matter.

Under existing legislation it is a requirement that an Environmental Impact Statement (EIS) be submitted in support of a Waste Licence Application. These documents when they are submitted should address the concerns that the Environmental Health Officers Service has in relation to the application.

Section 4.5 Environmental Nuisance Control identifies the nuisances associated with landfill sites and states that the Waste Licence Application and Environmental Impact Statement will provide details of the environmental controls for the listed environmental nuisances.

Section 4.6 states that the Waste Licence Application and the Environmental Impact Statement will include details of provisions for environmental monitoring and testing of nine environmental emissions. This documentation should include the frequency of the monitoring to be undertaken and the procedure in the event of a problem being identified.

The issue of contamination of water supplies and alternative water supplies if necessary must be addressed.

It is essential therefore that the SouthWestern Area Health Board receives a copy of the Waste Licence Application and Environmental Impact Statement in order to comment comprehensively on this matter.

Yours sincerely


**Paul Harrington
Principal Environmental Health Officer**