

Mr Derek Luby
John Barnett and Associates
(Roadstone Dublin Limited)
7 Dundrum Business Park
Windy Arbour
DUBLIN 14

Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland
Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire
T: +353 53 60600
F: +353 53 60699
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

30 March 2005

213-1

re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

Dear Mr Luby,

I am to refer to the above referenced application for a waste licence relating to a facility at Roadstone Dublin Remediation Landfill, Dillonsdown, Deerpark, Newpaddocks and Santryhill Townlands, Blessington, Co Wicklow. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 and Article 13 of the Waste Management (Licensing) Regulations.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed below:

ARTICLE 12 & 13 COMPLIANCE REQUIREMENTS

- (i) Furnish a checklist to show compliance with the seven individual items of Annex 1 of the Landfill Directive as required by Article 12 (e) of the regulations. Section 2 of the EIS and Attachment B6 is not suffice;
- (ii) Specify the fuels and energy which will be utilised in or produced by the activity as required by Article 12 (h) of the regulations. Attachment G1 is not suffice;
- (iii) Supply letter re leachate handling from Wicklow Co Co referred to in Attachment D4.j, but was not attached;
- (iv) Furnish new landfill gas monitoring results at Area 6, for 2005, to update Section 5 of the report written in August 2003 (Appendix 6A report of the EIS 'Environmental Risk Assessment and Management Strategy') and describe the



current landfill gas emissions at Area 6, to meet the requirements of Article 12 (k) of the regulations.

- (v) Provide information for the purpose of enabling the Agency to make a determination in relation to the matters specified in paragraphs (b) and (c) of section 40(4) of the Acts and Article 12 (j) of the regulations regarding the impacts on surface water and underlying groundwater quality. Update Attachment L1 of the application, and report in the following manner:
- a) The Geological Survey of Ireland letter dated 17 November 2003 designates the area for the proposed landfill cell south of 'Area 1' with a rating of R3¹. Demonstrate why the siting of the proposed landfill at a lower-risk alternative site is not practicable, as is required by the DoELG/EPA/GSI 'Groundwater Protection Responses for Landfills' document.
 - b) Revise the Appendix 6A report of the EIS 'Environmental Risk Assessment and Management Strategy' dated August 2003, in the following way:
 - Specifically all public water supply abstraction boreholes in Blessington must be included as the focus for the groundwater risk assessment, under 'Receptors' (section 3.6.15). The consultant's focus was at the River Burgess and at a hypothetical abstraction well immediately east of Area 6 which does not exist. The EPA requires the focus to be on the active pumping wells at Blessington village in addition to the River Burgess. You are to report all active abstraction wells at Blessington village and supply pumping rates and the zone of contribution/influence for each. Confirm lifespan of pumping with the Local Authority and estimate when all pumping wells are to be replaced by the new piped town supply. Re-run the 'P20' model for the two active pumping wells at the Blessington local authority compound, to determine the time of travel and impacts, if any, of the Area 6 waste body and proposed landfill on this major public water supply.
 - Leachate and surface breakout issues are reported in Appendix 6M of the EIS where a breakout of 690 litres /day from the landfill at 100 years is estimated by *Landsim*, yet the implications are not discussed. Assess this matter and integrate both breakout/overspill and liner leakage into the risk assessment report above. Further, provide for the loss of institutional control at the landfill and the consequence of any surface breakout from the landfill at the main receptors. Do this by modelling at 60 years post-closure (pumps are turned off); after 250 years, and at around 1000 years.



- c) Revise/amend Appendix 6G of the EIS (KTC report and map) to indicate where are sampling points SW1,2,3 since they show elevated Mineral Oil concentrations for March 2003, but are not annotated to the plan. Supply/refer Agency to repeat sampling results for SW1, 2, 3 in 2004 and an analysis of the current situation.

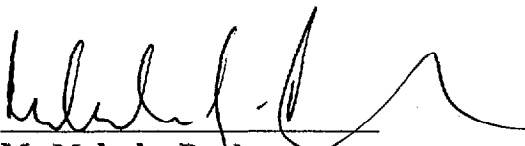
Your reply to this notice should include a revised non-technical summary (Application Form and EIS) which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Please supply the information in the form of a one original plus two copies within **TWO** months of the date of this notice. In addition submit eleven CD-ROM copies of the requested information to the Agency. The e-file should be saved as a 'pdf' file.

Please note that the application's register number is **213-1**. Please direct all correspondence in relation to this matter to the *Licensing Unit, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Mr Malcolm Doak
Inspector
Office of Licensing & Guidance

