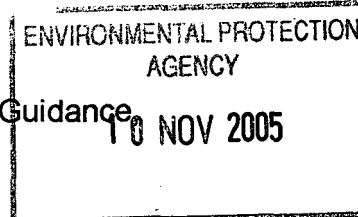


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Eve O'Sullivan  
Programme Officer, Office of Licensing and Guidance,  
EPA Headquarters,  
PO Box 3000,  
Johnstown Castle Estate, Co. Wexford.



Your Reference – 53-3  
Our Reference – BB/DD/170

November 7<sup>th</sup>, 2005

**Re: F.I. for Waste licence application, Bray Depot at Fassaroe, Bray, Co. Wicklow.**

Dear Miss O'Sullivan,

Please find the Board's comments outlined below regarding the F.I. on the above proposed waste licence application:

- The County Brook (Glenmunder) stream, which runs through the Fassaroe site, is a salmonid system and a tributary of the River Dargle. The River Dargle is an EU Designated Salmonid System. Preventing any polluting matter from entering this river, must be a key component of any waste licensing process.
- The commitment to preservation of a 10m wide riparian corridor contained in the F.I. document is potentially very important to the protection of local aquatic ecological integrity.
- The highly polluting nature of the wastewaters generated at this facility highlights the need for implementation of comprehensive foul and surface water management measures in order to safeguard the ecological integrity of local surface waters. Under no circumstances should there exist the possibility of cross-contamination of the two waste water streams, neither should there be any scope for foul water entry to the local surface water system.
- BAT mitigation measures should be implemented to ensure protection of the surface water system during any on-site remediation / construction programmes. The implementation of a SUDS system (as advocated in the Greater Dublin Strategic Drainage Study) on the site would be highly desirable both in the short and long term. The current surface water

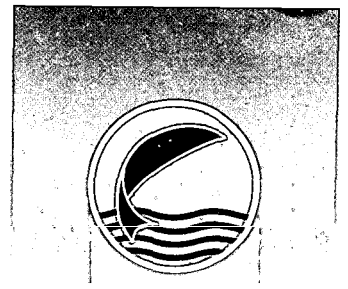
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systems drains water via soakaways and a subterranean system to the stream at the lower end of the site, arguably a high risk strategy in terms of potential contamination from on-site materials. The enhanced control of this element via a formal SUDS system arrangement is recommended.

- It would be prudent to carry out a daily visual check on all surface water discharges as well as carrying out quarterly analysis for a broader range of parameters.

I trust you will take our concerns on board.

Yours sincerely,

Brian Beckett

**Fisheries Environmental Officer – Dublin District**

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