



Environment & Resource Management Ltd

ENVIRONMENTAL PROTECTION
AGENCY WASTE LICENSING
RECEIVED
27 AUG 2004
INITIALS.....

No. 3 Tara Court,
Dublin Road, Naas, Co. Kildare
Tel: 045 - 874411
Fax: 045 - 874549
E-mail: info@erml.biz
www.erml.biz

Mr. Malcolm Doak,
Department of Licencing and Guidance,
Environmental Protection Agency,
Johnstown Castle,
Co. Wexford.

24 August 2004

Project No. 03.116

Re: Brownfield Restoration Ireland Ltd. Waste Licence Application No. 204-1 at Whitestown Lower, Co. Wicklow

Dear Malcolm,

We are acting on behalf of Brownfield Restoration Ireland Ltd (BRI). We refer to Waste Licence Application No. 204-1, which is currently under consideration by the Agency.

In addition to our report 'Comments on 3rd Party Submissions', which was issued to yourself on 13th August 2004, we have the following comments to make.

The Wicklow County Council submission to the EPA dated 21 July 2004 (Submission No. 70) included the following statement:

"The Eastern Region Fisheries Board has reported a year on year deterioration in water quality in the Carrigower River since 1998, which may be related to the commencement of intense commercial scale waste disposal activities in 1997".

An e-mail was sent to the Eastern Region Fisheries Board (ERFB) in an attempt to obtain the above information on water quality monitoring in the Carrigower River. The following response was e-mailed by Donnachadh Byrne, ERFB on 16/08/04:

Further to your enquiry regarding the Carrigower River. The Carrigower River is a tributary of the river Slaney. The Slaney River is a designated river under the European Communities (Quality of Salmonid Waters) regulations 1978 and is an important Spring Salmon & sea trout fishery. Wexford Harbour, the River Slaney and many of its tributaries (including the Carrigower) are already candidate Special Areas for Conservation (SAC), under the European Habitats Directive (Implemented into law by the Natural Habitats Regulations 1997). The river supports several species

listed in Annex II of the Directive including Salmon, River Lamprey, Brook Lamprey, Sea Lamprey, Freshwater Pearl Mussel and Otter.

The Carrigower River in the vicinity of the two sandpits and for some distance downstream is one of the more important salmon spawning and nursery tributaries in the Slaney system with over 170 salmon reeds counted by fisheries staff during the Winter 2002 - 2003. The ERFB don't carry out routine water quality monitoring on the Carrigower River. Wicklow County Council, Environment Section, Laboratory are probably worthwhile contacting for chemical results on the Carrigower and upper Slaney, while the EPA carry out Biological Monitoring on the Carrigower, Donard Brook and Upper Slaney every three years.

The Carrigower River receives pollution from the Donard Brook to which the overloaded Donard WWTP discharges. Agricultural pollution is also a problem on the Donard Brook. Cattle access to the upper Carrigower may also be a factor in the depressed Biological water quality in the area.

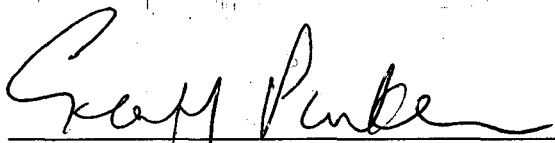
If you have any further enquiries, please do not hesitate to contact me.

Yours Faithfully,

Donnachadh Byrne
Fisheries Environmental Officer

From this correspondence, it appears that the ERFB do not carry out any chemical or biological monitoring of the Carrigower River and there are a number of other sources of pollution in the catchment of the river. Our data indicates higher levels of ammoniacal nitrogen up gradient of the Whitestown site, versus the section of river adjacent to the site. The sources of this pollution seem to be the Donard Waste Water Treatment Plant and other agricultural manure.

Yours sincerely,



Geoff Parker, M.E.Sc., M.I.E.I