

Sub (13) 204-1



**Eastern Regional Fisheries Board**  
Bord Iascaigh Réigiúnach an Oirthir



ENVIRONMENTAL PROTECTION  
AGENCY WASTE LICENSING  
RECEIVED  
29 APR 2004  
INITIALS.....

Karen Vaughey  
Programme Officer  
Office of Licencing & Guidance  
Environmental Protection Agency  
PO Box 3000  
Johnstown Castle Estate  
Wexford

26 April 2004

**Waste Licence Application by Brownfield Restoration Ireland Ltd. in relation to a facility / premises located at Whitestown Lower, Co. Wicklow.  
Register number : 204 - 1**

Dear Ms Vaughey,

With regard to the above waste licence application by Brownfield Restoration Ireland Ltd at Whitestown, 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 this site and for some distance downstream is one of the more important salmon spawning and nursery tributaries in the Slaney system with over 170 salmon redds counted by fisheries staff during the Winter 2002 - 2003.

The Board notes that between 220,000 and 260,000 tonnes of waste were deposited at the site and that these wastes represent a source of possible, existing or future pollution to groundwater and surface waters.

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The following are the concerns of the Board.

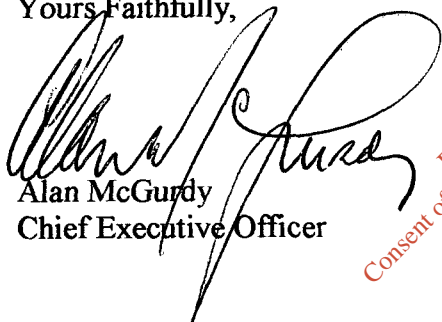
1. Section 2 of the EIS states that there was evidence of hazardous or household wastes at the site. It is our understanding that the investigation by Wicklow County Council revealed large volumes of both hazardous and household wastes, deposited at this site.
2. Section 3.4.5 states that as long as waste material is breaking down there is always a risk of leachate escape and migration into the river catchment, while section 3.7.1.3.6 states that the quality of groundwater located immediately downgradient of the waste zones is poorer than the upgradient wells, with elevated concentrations for the leachate indicator parameters. This would suggest that leachate production is already underway at this site with movement into the Slaney SAC area. The owners of the site, Brownfield Restoration Ireland Ltd. are responsible for the leachate emissions currently arising from the site and the EIS states "as these wastes were deposited in unlined areas, the potential for ongoing emissions into the groundwater / surface water environments is likely to continue". It is the opinion of this Board that Brownfield Restoration Ireland Ltd. have a responsibility to immediately put a leachate interception / pumping and treatment programme into place at their site to mitigate against the movement of leachate into ground & surface waters as outlined in this EIS.
3. Section 3.7.1.3.2 of this EIS states that the groundwater vulnerability within the area of the site is classified as extreme. Section 3.4.5 states that as long as waste material is breaking down there is always a risk of leachate escape and migration into the river catchment. It also states that engineering methods are available to recover such leachate but that they are not always totally satisfactory. The EIS states there is thus the possibility of a temporary negative impact on the Carrigower River and associated SAC, which would continue for 10 years or so after the completion of the landfill and that the worst case was for the River to be polluted over an extended period by ammoniacal nitrate, which is harmful to fish and causes eutrophication. While the Board recognises there is a risk with any engineered leachate containment system the siting of any new landfill would normally be in an area with low groundwater vulnerability. The EXTREME vulnerability of the groundwater and the proximity of the Carrigower River make this a special case and any escape of landfill leachate to groundwater or the Carrigower River and associated SAC is totally unacceptable. An engineering solution which manages this risk at this site, ensuring that no leachate enters groundwater, surface water, the Carrigower River and associated SAC will have to be found.
4. The EIS has no proposal for the treatment of dumped soil & gravels which have been contaminated by diesel / oil and other pollutants.
5. Section 2.8.2.2 states that the liquid from the RRB and associated hardstand may be mildly contaminated as it may be in contact with wastes for short periods of time and that it is expected that runoff from this area will not be

considered leachate, it will be directed to a holding pond to be located in the proposed phase 5 of the landfill development. Considering the importance and sensitivity of the Carrigower River, the Board feel that even mildly contaminated waters must be considered as leachate and be treated accordingly.

6. Section 2.8.3.5 states that leachate will be removed by vacuum tanker and that the proposed method of disposal of leachate from the proposed landfill is the treatment plant located in Baltinglass, County Wicklow. Baltinglass is a rapidly expanding town with large scale housing developments leading to increased pressure on Baltinglass Waste Water Treatment Plant, which already has to treat the landfill leachate from Rampere landfill. The Board is concerned that Baltinglass WWTP may not have adequate capacity to treat the leachate from this landfill, and treatment of leachate from this facility at Baltinglass WWTP could overload the plant leading to pollution of the Slaney River at Baltinglass.
7. Section 2.11.5 states that there will be a wheel wash on site. We request further information re. the treatment of silt and excess wash water from this wheel wash.

Please inform the Board of any developments with regard to this Waste Management Licence Application.

Yours Faithfully,



Alan McGurdy  
Chief Executive Officer

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