

Sub (9) 204-1

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Co Wexford

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Tel: 045 404756
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Your Ref: 204-1

Dear Sirs

I wish to object to the proposal by Brownfield Restoration Ireland Ltd to site a waste management facility at the quarry formerly owned by John O'Reilly at Whitestown, near Baltinglass in Co Wicklow. I hereby urge you in the strongest possible terms not to grant a license for anything other than the complete removal of all contaminated waste from the site.

I understand that you have already received an application which refers to the treatment on site of the hazardous waste which was dumped there illegally. The Co Council have informed me that the quantity of illegal waste on site is about 500,000 tons, but that the actual tonnage of contaminated soil as a result of the movement of the leachate in a southerly direction, is somewhere between 8,000,000 and 16,000,000 tons. What has the application to say about the treatment of these lands? More to the point, what are your requirements in relation to this matter?

Furthermore, council officials refer to Brownfield Restoration Ireland Ltd as a subsidiary of A1 Waste, who are responsible for the illegal dumping in the first instance, they have already been found guilty in relation to the illegal dump at Coolamadra, and therefore under the Waste Management Act would be deemed NOT FIT to hold a waste management license, similarly any related persons or associates would also be not fit to hold such a license. This I believe applies to Brownfield Restoration Irl Ltd. Can you please advise me what steps you will take to ensure that the law is strictly upheld in this instance?

It is also a requirement under the Waste Management Act that the company concerned show where the money is to come from to deal with such a costly restoration. 16 million tons of contaminated land will require a colossal financial input to restore it. Where did the money come from in the first place to buy the quarry from John O'Reilly? Who are Brownfield Restoration Irl Ltd? Their company was only inaugurated in September 2003 when the land was bought. They have NO track record of restoration of this nature and therefore are not competent even to be considered for the granting of such a license. Do you intend to follow the money trail and ensure the legitimacy of the applicants?

Other concerns in relation to this application are as follows:

- 1) The area itself is already designated as Special Area of Conservation and the Carrigower River which runs through it forms part of the head waters of the Slaney River Valley. This is a salmon spawning area, and there is also an otter population in the river valley. There could be no possible logic that would site a landfill facility (the most out-dated and environmentally destructive form of waste management) in an SAC.
- 2) The site is totally unsuitable for use as a landfill facility. Wicklow county council rejected it as a possible site for same because of the porous nature of the land. It has a sand and gravel bed with no clay deposits underneath as would be absolutely necessary.

3) The N81 road which services the area is not suitable to take the increase in traffic which would result from the granting of the license applied for. At present the N81 is one of the most dangerous roads in the country and fatal road accidents are all too frequent on it. The road is narrow and twisty at the immediate area of the entrance to the site, and could not safely accommodate the number of lorries (one every six minutes I am advised) which would be using it.

4) This site has been a quarry for many years. It was never intended to be a landfill facility and has never had a license or planning permission to be used for landfill purposes. All waste on this land is unlawfully dumped there. Those who dumped it are guilty of breaking the law and of causing serious damage to the environment. Criminal activity MUST NOT be allowed to decide the location of landfill sites in contravention of the law and of the County development Plan which clearly states that Rampere is the location of West Wicklow's landfill facility. The criminal activity generated huge profits for those involved and this money should now be used to completely remove the waste dumped there and to restore the rest of the lands contaminated by their unlawful activity.

5) The increase in noise resulting from an endless stream of lorries, arriving, reversing, revving, dumping etc is totally unacceptable in an otherwise peaceful rural location, gateway to the Glen of Imaal and Wicklow National Park, an area much visited by tourists and walkers though sparsely inhabited. My family I live in the immediate area and would be directly affected by any and all activity on this site. Our reports to yourselves and to the Co Council back in 1998 concerning the illegal dumping which was then taking place went unheeded resulting in the environmental crisis that we now face. Don't make the same mistake again!

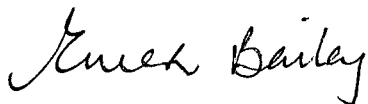
6) The granting of a waste management license on this site would result in there having to be at least two constantly burning flames which will cause a major intrusion into the rural environment.

7) The increase in the rodent and carrion population would be totally unacceptable; it has already been established that the illegal waste on this site is extremely hazardous and there is a real fear of the possible spread of infection. Removal of this waste is the only acceptable solution.

In closing, I appeal to you as the Environmental Protection Agency, to do just that. Please, please, protect our environment. It has already been seriously damaged by illegal activity. Do not compound the problem. Do not grant permission to Brownfield Restoration Ireland Ltd to site a waste management facility at O'Reilly's Quarry. Do not allow criminal activity decide where landfill will be located for their own financial benefit. This application is about making millions of euro (€400,000,000 is a conservative estimate) for the applicants. It is NOT environmentally motivated. Please reject it.

I await your response and answers to the questions posed.

Yours sincerely



Emer Bailey