

065 (7)



## An Taisce – The National Trust for Ireland

02 May 2006

### Observations on conditions of Proposed Decision by the EPA to license remediation of Unauthorised Landfill at Whitestown Lower, County Wicklow.

#### Re: EPA Waste Licence Register Number 204-1

An Taisce welcomes the Proposed Decision by the EPA to license the remediation of the unauthorised landfill at Whitestown.

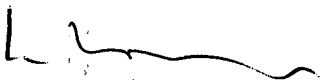
Clarity is required re the use of inert waste for the purpose of remediation. The Proposed Decision prohibits the importation of waste except for inert material recovered from the remediation of illegally deposited waste. It should be made specific in the licensing conditions that the site is restored to beneficial agricultural use upon completion of the remediation allowed for within this license.

The Proposed Decision allows for an unnecessary long duration of five years for the remediation.

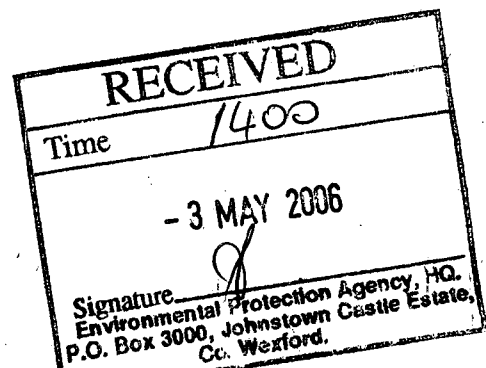
A requirement that only mobile plant is allowed on site and that fixed plant will not be permitted should be inserted into the licensing conditions. Structural development would necessitate a planning application and it has already been acknowledged by the EPA and other agencies that this is an unsuitable location for the processing of waste.

Given the site history, a requirement should be inserted into the licence conditions that the remediation process be carried out under supervision of a suitable EPA staff member at all times so as to maintain public confidence.

Conditions should be amended requiring the licensee to notify the Agency of any release of pollutants to the environment immediately because of vulnerability of ground and surface waters and proximity of European Designated salmonid river (SAC) and proximity of nearby residents.

  
**Ian Lumley**  
**Heritage Officer**

Cheque encl: €63.49





**An Taisce – The National Trust for Ireland**  
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The Environmental Protection Agency,  
PO Box 300,  
Johnstown Castle Estate,  
Co Wexford.

3<sup>rd</sup> May 2006

**Additional Comments from An Taisce pertaining to the Licence Register Number:**

**204-1**

**Applicant / Licensee:           Brownfield Restoration Ireland Ltd**

**Location of Facility:           Whitestown Lower, Co. Wicklow**

Comments to be considered as part of 'hard copy' submission from An Taisce dated 02<sup>nd</sup> May 2006.

Dear Sir / Madam,

An Taisce welcomes the decision of the EPA to grant a limited waste licence to Brownfield Restoration Ireland Limited for activities associated with the cleanup and remediation of an unauthorised landfill only, and welcome most of the conditions attached with the licence, in particular conditions 1.3 and 1.4.

An Taisce are fully supportive of the comments and concerns contained in the objection made on behalf of the Whitestown Awareness Group to this proposed licence, in particular their concerns regarding site unsuitability, vulnerability of the underlying aquifer and the Carrigower River, and disturbance from long term remediation operations to the local residents. Due to remaining risk to water quality and protected habitats and species, An Taisce wishes to lodge an objection to the proposed determination for a facility at Whitestown Lower, Co. Wicklow.

**Threats to Aquifer and Carrigower River Special Area of Conservation and SCI (salmonid) river**

As referred to in An Bord Pleanála's decision and the 'Proposed Decision', the hydrological conditions at this site including the high permeability of the underlying geology and the location of the facility adjacent to the Carrigower River (a designated Special Area of Conservation and now accepted Site of Community Importance under Dir 92/43/EEC), would result in the proposed development giving rise to a high risk of significant adverse impact on the Special Area of Conservation.

An Taisce submits that both the treatment of liquid and sludge in pits and ponds and the physico-chemical treatment of compounds or mixtures presents an unacceptable risk of water pollution (as regulated by the Water Framework Directive) and ecological threat to the protected river (as regulated by the Habitats Directive). The licence must stipulate that all waste effluent should be removed and treated off site, leaving on site storage to a

minimum in order to minimise accidental influx of any pollutants to the aquifer or the Carrigower River.

Particular caution must be exercised to ensure that composting activities, being only 40 metres from a residential house and posing a risk to the Special Area of Conservation, do not pose any risk from effluent or runoff from them entering the River.

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