



# Comhairle Chontae Chill Mhantáin

Wicklow County Council

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Our Ref:

Ms Ann Bosley  
Office of Licensing and Guidance,  
E.P.A.,  
PO Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.

01 JUN 2006

30<sup>th</sup> May 2006

**Re: Brownfield Restoration Ltd., licence application reference W0204-01**

Dear Ms Bosley,

Further to the objection forwarded by Golder Associates on behalf of Brownfield Restoration Ireland Limited (BRI), dated 03 May 2006, to the EPA's proposed decision on waste licence application No. 204-1 submitted by BRI for the site at Whitestown Lower, Co. Wicklow, Wicklow County Council (WCC) wishes to comment on issues raised in that objection.

WCC notes that BRI is now changing the focus of its application:

- From - the removal of the illegal landfills,  
- and the development of a large integrated waste disposal facility at the site.
- To - the removal of the authorised landfills,  
- the development of a landfill for the residual waste from the illegal landfills from this site and from the other illegal sites in County Wicklow and adjoining areas,  
- the creation of an inert soil disposal facility at the site.

The amended proposal by BRI plans to create an engineered landfill of sufficient capacity to take all the residual wastes from the illegal landfills in Wicklow and the surrounding areas. This landfill, based on the Golder Associates' Figures No. 01 and 02 that accompanied the objection, will be up to 20m high at the northern end of the site and approximately 10m high at the southern end. It is not possible at this stage, to determine the volume of the residual wastes from the BRI site that will require to be disposed off in a landfill and there is no guarantee that residual wastes from the other illegal sites would be sent to this landfill. The list of other illegal landfills that they quote includes the landfills on the Roadstone Dublin Limited property in Blessington even though this facility has been granted a waste licence by the EPA for the remediation of the waste bodies and preparatory works have commenced on the site. The residual wastes from the Roadstone site will be disposed off in existing licensed landfills.

All correspondence should be addressed to the Senior Executive Officer, Environmental Services

Seoltar gach comhfhreagras chuig Príomhfheidmeannach na Seirbhísí Comhshaoil

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Wicklow County Council believes that the remediation of the bodies of illegal waste at the Whitestone Lower site is best achieved by the EPA granting BRI a waste licence that would be similar to the licences that were granted to Swalcliffe Limited and Roadstone Dublin Limited for the remediation of the illegal landfills at Coolamaddra and Blessington, respectively. This licence should permit the excavation of the wastes, their processing on site to separate the soil from the wastes and to segregate any wastes that could be recycled, the removal of the residual wastes off-site to licensed landfills and the use of the separated soil on-site for restoration if the results of sampling of the soils prove that they are inert. Wicklow County Council therefore believes that Condition 1.3 should remain as proposed, i.e. *"All domestic, commercial, and other non-inert wastes shall be removed off-site to an approved disposal/recovery facility"*.

The Golder Associates' objection also objects to Condition 1.4, *"The importation of waste onto this facility is prohibited under this licence"*. The objection states that there is a large void of approximately 1,200,000m<sup>3</sup> resulting from past sand + gravel extraction at the site and that the filling of this void is required by Condition 4(b) of planning permission no. 2492/78 (PL.2743504). This condition states *"A scheme for the landscaping and reinstatement of the lands showing proposals for the replacement of any waste materials, clay and soil so as to make the land suitable for agricultural, recreational or other suitable use and consistent in appearance with surrounding land including any seeding, planting or landscaping considered necessary"*.

The original BRI application sought to fill the void with a large engineered landfill and the current Golder Associates proposal now plans to fill the void with a combination of an engineered landfill and an inert soil disposal facility. The final restoration levels of both of these proposals are similar, see the attached plans, BRI / 109, dated March 2004 and Figure No. 01, dated May 2006.

The reinstatement of lands to agricultural or recreational use does not require the replacement of the original mineral resource with a ridge of waste deposited to a similar elevation. The depositing of such a large volume of waste would impact on the future sustainable extraction of the adjoining sand + gravel resources. Wicklow County Council believes that the issue of the reinstatement of the pit should be the subject of a separate waste licence application for the importation of inert soils and that no material should be imported to the site until the remediation of the unauthorised bodies of waste is completed. Thus the Council believes that Condition 1.4 *"The importation of waste onto this facility is prohibited under this licence"*, should be retained as documented in the proposed decision.

Yours sincerely,



Michael Nicholson,  
Director of Service  
Environmental and Water Services.

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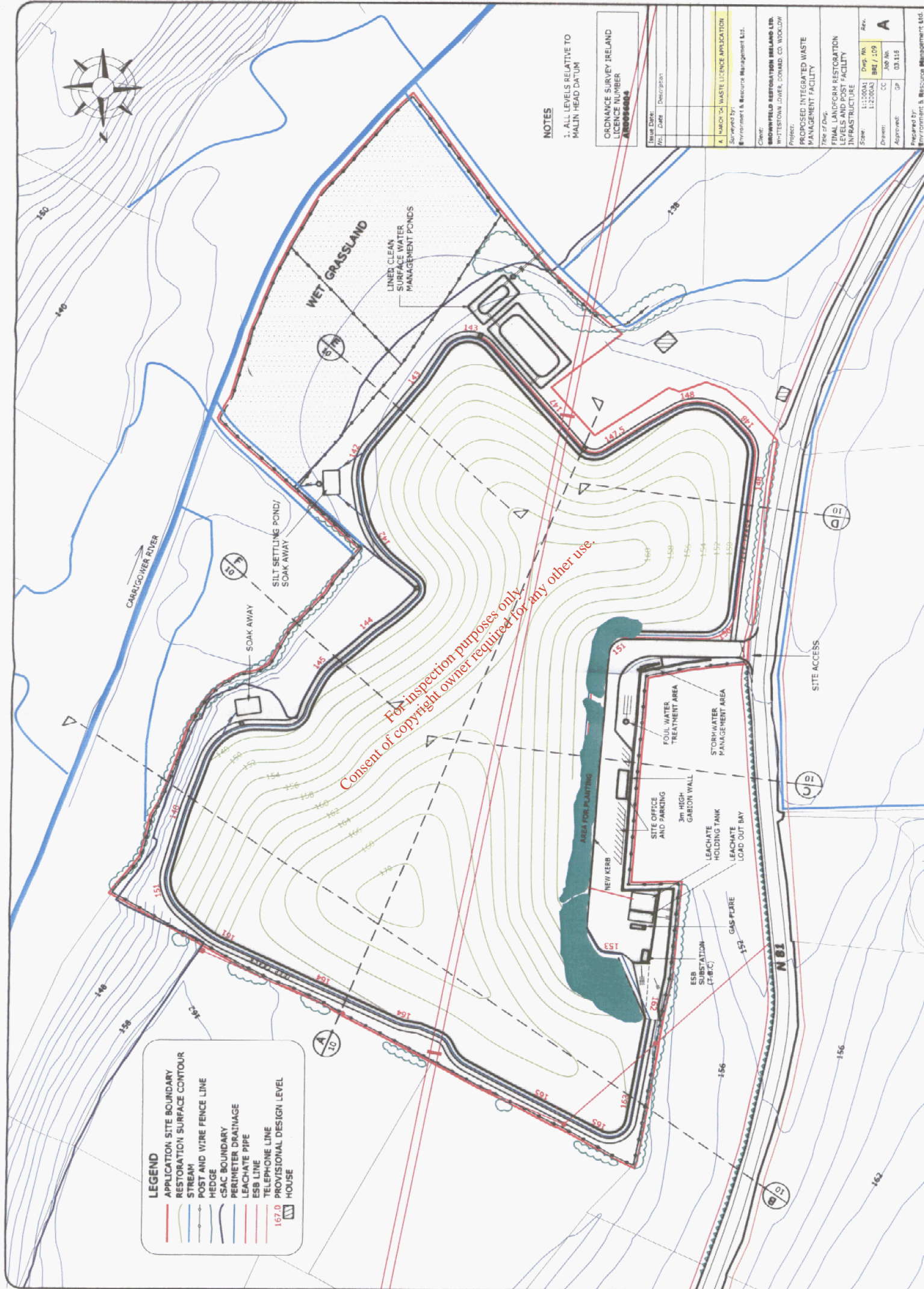
**LEGEND**

|  |                                 |
|--|---------------------------------|
|  | APPLICATION SITE BOUNDARY       |
|  | RESTORATION SURFACE CONTOUR     |
|  | POST AND WIRE FENCE LINE        |
|  | HEDGE                           |
|  | CSAC BOUNDARY                   |
|  | PERIMETER DRAINAGE              |
|  | LEACHATE PIPE                   |
|  | ESB LINE                        |
|  | TELEPHONE LINE                  |
|  | 1:67.0 PROVISIONAL DESIGN LEVEL |
|  | HOUSE                           |

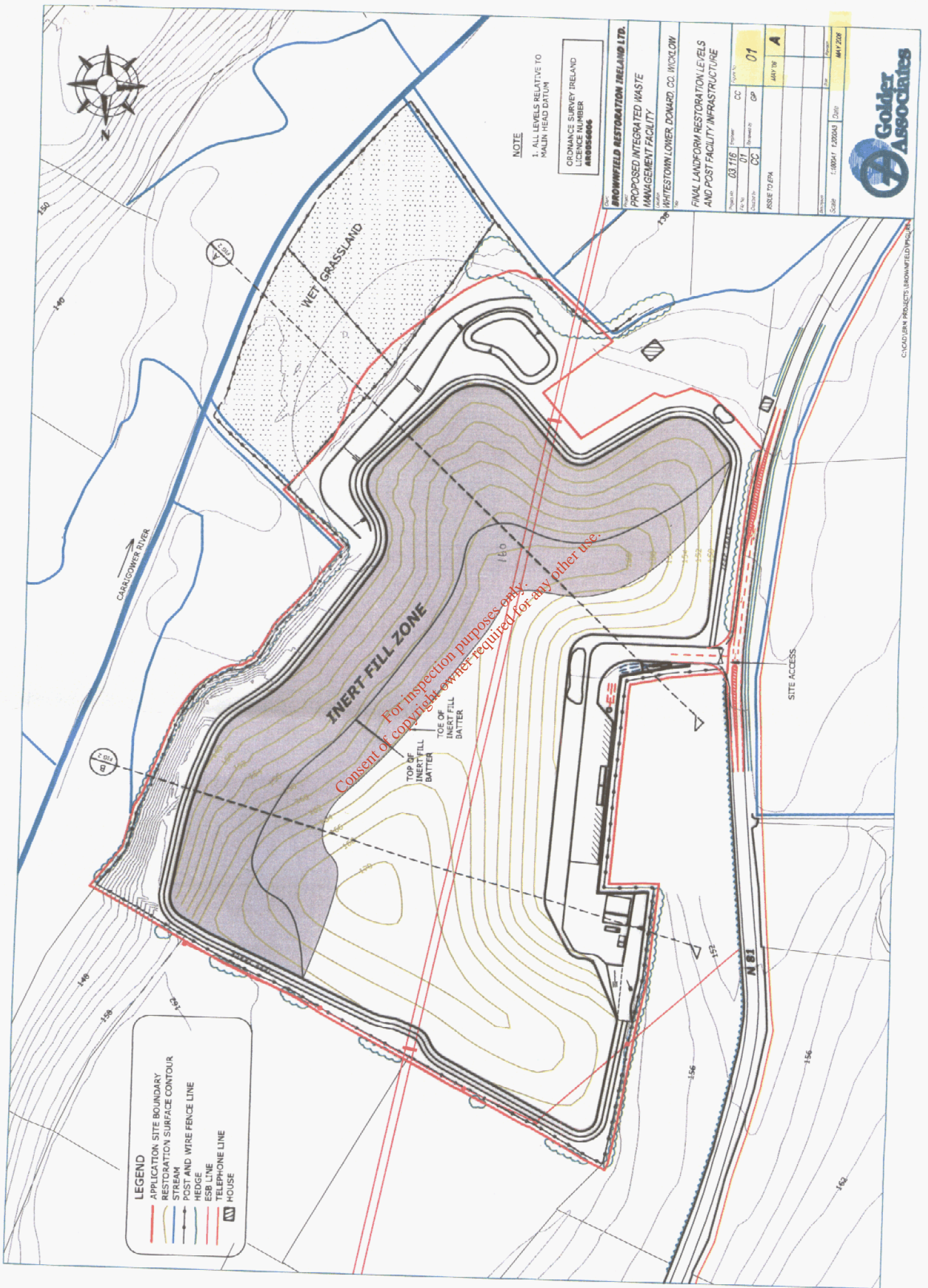
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**NOTES**  
 1. ALL LEVELS RELATIVE TO MALIN HEAD DATUM

|   |              |
|---|--------------|
| ORDNANCE SURVEY IRELAND<br>LICENCE NUMBER<br><b>180000043</b>                                 |              |
| Issue Date:   |              |
| No.:  | Description: |
| Surveyed by:<br><b>A. MARCHIONI WASTE LICENCE APPLICATION</b>                                 |              |
| Client:<br><b>GREENFIELD RESTORATION IRELAND LTD.</b><br>WATERLOO COURT, CORNUM RD., MAAS CO. |              |
| Project:<br><b>PROPOSED INTEGRATED WASTE MANAGEMENT FACILITY</b>                              |              |
| Type of Draw:<br><b>FINAL LANDFORM RESTORATION LEVELS AND POST FACILITY INFRASTRUCTURE</b>    |              |
| Scale:  | Drawn:       |
| 1:12000   | CC           |
| 1:22000   | GP           |
| Drawn:  | Job No.:     |
| GP  | 03.115       |
| Approved:   | Rev.:        |
| GP  | <b>A</b>     |



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**NOTE**

1. ALL LEVELS RELATIVE TO MAIN HEAD DATUM

ORONANCE SURVEY IRELAND  
LICENCE NUMBER  
AR0056806

**BROWNFIELD RESTORATION IRELAND LTD.**  
PROPOSED INTEGRATED WASTE  
MANAGEMENT FACILITY  
WHITESTOWN LOWER, DONARD, CO. WICKLOW

FINAL LANDFORM RESTORATION LEVELS  
AND POST FACILITY INFRASTRUCTURE

|             |        |              |         |
|-------------|--------|--------------|---------|
| Project No. | 03 116 | Client       | CC      |
| Scale       | 01     | Revision No. | 01      |
| Author      | CC     | Issue To     | 01      |
| Issue To    | CC     | Issue To     | 01      |
| Scale       | 01     | Date         | MAY '06 |

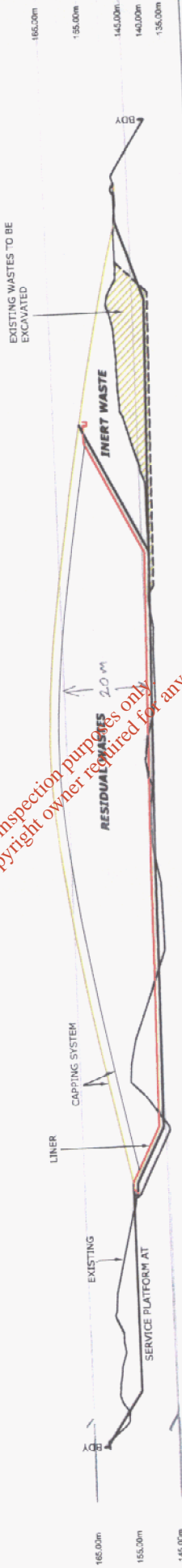
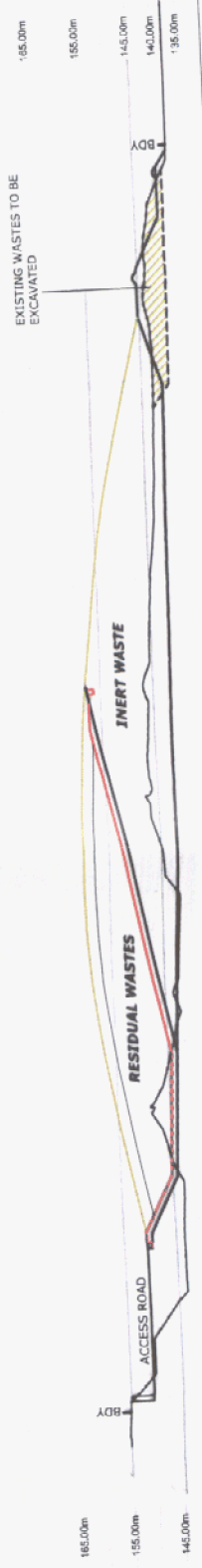


MAY 2006

- LEGEND**
- APPLICATION SITE BOUNDARY
  - RESTORATION SURFACE CONTOUR
  - STREAM
  - POST AND WIRE FENCE LINE
  - HEDGE
  - ESB LINE
  - TELEPHONE LINE
  - HOUSE

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|   |          |   |          |
|---|----------|---|----------|
| Project Name  |          | Brownfield Restoration Ireland Ltd.           |          |
| Client  |          | Proposed Integrated Waste Management Facility |          |
| Site  |          | Whitestown Lower, Donard, Co. Wicklow         |          |
| SECTIONS<br>(REFER TO FIGURE 1 FOR SECTION LOCATIONS) |          |   |          |
| Project No.   | 03.116   | Client  | CC       |
| Rev. No.  | 02       | Contract                                      | GP       |
| Contract No.  | CC       | Issue   | MAY 06   |
| ISSUE TO EPA  |          | A   |          |
| Drawn   | F. SMYTH | Checked                                       |          |
| Scale   | 1:500    | Date  | MAY 2006 |

