

Sub on 06/06

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ENVIRONMENTAL MANAGEMENT SERVICES
Comhairleoirí Comhshaoil
Environmental and Planning Consultants

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Office of Licensing and Guidance,
 Environmental Protection Agency,
 PO Box 3000,
 Johnstown Castle Estate,
 Co. Wexford

06 June 2006

BY EMAIL AND FAX

Dear Sir,

**Proposed Decision by the Environmental Protection Agency to Grant a
 Waste Licence to Brownfield Restoration Ireland Limited for the Clean-up
 and Remediation of an Unauthorised Landfill at Whitestown Lower,
 County Wicklow.**

EPA Waste Licence Register Number 204-1

OBSERVATIONS ON BEHALF OF THE WHITESTOWN AWARENESS GROUP

In response to the Environmental Protection Agency's letter dated 04 May 2006, enclosing copies of six other objections received by the Agency, we wish to submit the attached observations on behalf of the Whitestown Awareness Group. As previously notified to the Agency in our objection to the Proposed Decision, the address of the Whitestown Awareness Group is:

**C/o Ms Emer Bailey,
 Donoughmore,
 Donard,
 County Wicklow.**

We also wish to take this opportunity to re-state that the Whitestown Awareness Group is satisfied that the proposed waste licence allows only those activities necessary for the clean-up and remediation of this unauthorised landfill, and that the licensee is not permitted by the licence to import waste to the site.

Yours sincerely,

Jack O'Sullivan

Jack O'Sullivan

Environmental Management Services

on behalf of the Whitestown Awareness Group

RECEIVED	
Time	1700
- 6 JUN 2006	
Signature	<i>[Signature]</i>
Environmental Protection Agency, HQ. P.O. Box 3000, Johnstown Castle Estate, Wexford.	

ENVIRONMENTAL MANAGEMENT SERVICES

Proposed Decision by the Environmental Protection Agency to Grant a Waste Licence to Brownfield Restoration Ireland Limited for the Clean-up and Remediation of an Unauthorised Landfill Site at Whitestown Lower, County Wicklow.

EPA Waste Licence Register Number 204-1

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1. Introduction

These observations are made in response to the Agency's letter dated 04 May 2006. Enclosed with this letter were six other objections received by the Agency from:

- The Chrysalis Centre,
- Peter Walton and Florence Staunton,
- Emer and Russ Bailey,
- Wicklow County Council,
- An Taisce, and,
- Golder Associates on behalf of Brownfield Restoration Limited, objecting to conditions 1.3 and 1.4 of the Agency's proposed license.

2. Principal Points Raised in the Other Objections Received by the Agency

2.1 Objection by The Chrysalis Centre

The Chrysalis Centre is the nearest place of business to the existing unauthorised landfill site at Whitestown Lower; they raised concerns about the following issues, and they suggested the following changes or additions to the proposed waste licence:

1. An EPA technical advisor or a qualified independent consultant should be on site at all times during the remediation works;

2. The licence conditions should include a specific start date, requiring the licensee to commence the operation as soon as possible;
3. No permanent structure, e.g., a lagoon, should be allowed to be built on the site; instead, a mobile resource recovery unit and a covered leachate holding tank, similar to those recommended in the Agency's licence issued to Roadstone for the Blessington site, should be required by this licence for the Whitestown site;
4. The recommended in-vessel composting unit would be unsuitable for rural conditions because of odours and noise pollution, and the Chrysalis Centre suggests a mobile composter for the remediation period. They also requested that all material should be transported in securely covered vehicles.
5. The Chrysalis Centre drew the attention of the Agency to an extract from the report by the inspector appointed by An Bord Pleanála to consider the planning appeals, and included his quotation noting that *"there will be an adverse impact on the amenities of the residential property within 300 metres distance of the appeal site over and above the existing levels which would be significant during the construction and operation stages"*.

2.2 Objection by Peter Walton and Florence Staunton

Local residents Peter Walton and Florence Staunton requested the Agency to:

1. Set a time limit within which the remediation must be completed;
2. No lagoons should be permitted on site, only a mobile facility, such as specified by the Agency for the Roadstone site in Blessington;
3. On completion of the remediation activities, Condition 10 (which requires closure, restoration and aftercare) must be strictly adhered to, but with the additional requirement that the site must revert immediately to agricultural or similar natural use.

2.3 Objection by Emer and Russ Bailey

Local residents Emer and Russ Bailey congratulated the Agency on the proposed decision, but requested the EPA to take account of the following areas of concern:

1. An immediate start date should be included as a licence condition;
2. Open lagoons are not acceptable, and mobile leachate holding tanks should be specified in the final licence;
3. There should be a limit placed on the operational hours of the composting unit, as it is likely to cause noise pollution. The licence should also specify that the composting unit and other plant brought onto the site must be removed on completion of the remediation works;

4. No permanent building should be erected for recycling or recovery; any such building should be temporary or mobile;
5. The operational hours as set out in the proposed licence are excessive, and would cause local noise nuisance and annoyance. Instead, the operational hours should be reduced to the following periods: 0800 to 1800 Monday to Friday, and 0800 to 1300 on Saturdays, with no working on Sundays or bank holidays;
6. An EPA technical expert should be present during normal operational hours at the site for the entire duration of the remediation process;
7. Any incident of water pollution should be reported "*immediately*" instead "*as soon as practicable*".

2.4 Objection by Wicklow County Council

Wicklow County Council, while welcoming the proposed decision on the waste licence application by Brownfield Restoration Ireland Limited, suggests the following proposed amendments:

1. Class 5 should be omitted from the schedule of waste disposal activities in the licence (page 5 of 30) because no engineered landfill would be constructed at the site. However, Class 1 should be added, to permit the deposition of recovered inert soils at the site following excavation and treatment of the wastes;
2. Composting should be omitted from the authorised processes listed in Schedule A: Limitations (25 of 30) because the County Council believes that none of the organic wastes present within the unauthorised landfill would be suitable for composting, having been buried in the ground for more than 5 years;
3. Therefore the installation of the compost facility should not be included in Schedule D: Specified Engineering Works (page 28 of 30) (also Condition 3.5 on page 9);
4. Condition 8.9.3 (page 18) should be omitted as there would be no on-site landfill facility on the Whitestown site;
5. The Council believes that the waste licence should require Brownfield Restoration Ireland Limited to submit a method statement to detail the methodology and procedures required to complete the remediation of the site. The Council also believes that the final waste licence issued to Brownfield Restoration Ireland Limited should contain a time-table for completion of the different phases or the remediation process.

2.5 Objection by An Taisce

While welcoming the proposed decision by the EPA to licence the remediation of the unauthorised landfill at Whitestown, An Taisce is concerned about the following issues:

1. Clarity is required regarding the use of inert waste for the purpose of remediation;
2. A specific licence condition should be included, stating that the site must be restored to beneficial agricultural use upon completion of the remediation allowed by the licence;
3. The proposed duration of 5 years for remediation is unnecessarily long;
4. A requirement that only one mobile plant is allowed on site and that a fixed plant will not be permitted should be inserted in the licensing conditions. It has already been acknowledged by the EPA that this is an unsuitable location for the processing of wastes.
5. A licence condition should be inserted requiring the remediation process to be carried out only under supervision of a suitable EPA staff member at all times;
6. The licensee should be required to notify the Agency of any release of pollutant into the environment immediately.

2.6 Objection by Golder Associates on Behalf of Brownfield Restoration Limited, Objecting to Proposed Conditions 1.3 and 1.4 of the Agency's Proposed Licence

Golder Associates, on behalf of Brownfield Restoration Ireland Limited suggest a number of changes in Conditions 1.2 and 1.3 of the Proposed Decision.

In support of their request for the suggested changes, they point out that they have amended their original proposal, and their focus is now on remediation of existing unauthorised waste disposal sites in County Wicklow and adjoining areas. Therefore, they again make the point that the site at Whitestown, which they allege was used by Wicklow County Council and others for the disposal of waste over many years, would be an appropriate site within which to process and recover wastes from other unauthorised waste facilities in County Wicklow.

In support for their objection, Golder Associates point out that their proposal is in accordance with the Section 60 Guidance Note issued by the Minister for the Environment on 03 May 2005, and that the criteria to be used in deciding to whether or not to grant a waste licence do not include such issues as "good governance" which was cited by the Agency's inspector.

Golder Associates also point out that if Condition 1.4 is left unaltered, thereby prohibiting the importation of any waste onto the Whitestown facility, a considerable void space would be left in the quarry, resulting in significant on-going risks to the environment, and a liability to the owner, and there is a considerable risk that further unauthorised disposal of wastes could occur on the site at any time in the future.

Finally, Golder Associates take issue with the EPA about the timing of the release of documents in relation to the application; and they point out that the NIMBY syndrome is particularly well developed in Ireland in relation to waste facilities, and *"the leaking of documents, such as occurred in relation to this application, only serve to heighten these attitudes"*.

Appended to the Golder Associates submission is an extract from the EPA report on the Nature and Extent of Unauthorised Waste Activity in Ireland, a submission by Wicklow County Council (July 2004), a copy of the Department of the Environment, Heritage and Local Government Circular (WIR 04/05 dated 03 May 2005), containing policy guidance on action against illegal waste activity and movement of waste, and a report by Golder Associates containing simulations of the proposed Whitestown landfill performance using the latest version of the LandSim mathematical model.

3. Observations on the Issues Raised in the Other Objections Enclosed with the Agency's Letter

3.1. Material Change in the Nature of the Proposed Development

The submission by Golder Associates dated 03 May 2006 on behalf of Brownfield Restoration Ireland Limited states that the *"applicant has amended its original proposal ... and does not now propose to develop a facility for the processing, recovery and disposal of wastes currently arising"*. Instead, the *"applicant's focus is now on the remediation of the existing unauthorised waste sites in County Wicklow and adjoining areas"*.

We would submit that this change from the applicant's original proposal is a substantial and material change, affecting not only the Whitestown site but a number of other unspecified waste disposal sites in County Wicklow and other counties. Therefore, the applicant's EIS is inappropriate and inadequate in that it fails to set out how the new proposal will affect the environment. From a planning perspective, it is clear that the changes in the proposed development described by Golder Associates should require a new planning application and a new Waste Licence Application. Therefore their application now before the Agency should be rejected, and the applicant should be instructed to make a new application (if he so wishes).

3.2 Structures on Site

We agree fully with the Chrysalis Centre, An Taisce and with Peter Walton and Florence Staunton that the construction of lagoons and buildings (even for the purpose of sorting or recovering wastes) should not be permitted on the Whitestown site. If such buildings were permitted, their presence would increase the risk and possibility of the site being used as a location for the processing of wastes imported from other unauthorised landfill sites in County Wicklow. Even if such importation were prohibited at present (as in the case

of the present Proposed Waste Licence), a subsequent licence application could be made by Brownfield Restoration in the expectation that such an application would be treated more favourably.

Furthermore, by preventing (under an appropriate condition of the waste licence) the construction of permanent structures (such as lagoons or buildings), the remediation of the site and its restoration to agricultural land could proceed more quickly than if buildings and other structures first had to be demolished and removed.

3.3 Operational Hours and Nuisance

We fully agree with the point made by Emer and Russ Bailey that operational hours at the Whitestown Lower site should be significantly restricted under the final waste licence.

As the Agency will be aware, Whitestown Lower is a rural area, and one of the nearest buildings is a holistic and meditation centre, relying for its continuous business on a quiet and unspoiled environment. The operation of machinery a short distance away would seriously injure residential and other amenities, and it is our submission that the operational hours should be restricted (as suggested by Emer and Russ Daily) to between 0800 and 1800 on week-days and from 0800 to 1300 on Saturdays. If the Agency accepts the suggestion by Wicklow County Council that there should be no composting on site, this would have the additional advantage of removing a further source of noise and nuisance.

3.4 Composting of Residual Wastes on Site

Wicklow County Council has made the valid point that none of the organic wastes present within the unauthorised waste mass would be suitable for composting at this stage, since they have been buried in the ground for more than 5 years. We would agree that there would be serious difficulties in composting this organic waste; firstly, its composition is unknown, it is likely to be seriously degraded by decomposition processes which have been ongoing for more than five years, it will not contain the necessary nutrients required to support the microbial flora which carry out the composting processes, and, when disturbed and laid out in windrow formations for composting, this waste could give rise to serious noxious odours.

The suggestion that these residual organic wastes should be composted in-vessel is more acceptable, provided that noise levels can be kept to a minimum, especially at night when noise levels are low in this rural area.

We therefore agree with the suggestion by Wicklow County Council that composting should be omitted from the authorised processes listed in Schedule A and that the compost facility should not be included in Schedule D: List of Specified Engineering Works.

3.5 Compliance with Department of the Environment Circular WIR 04/05 On Policy Pursuant to Section 16 of the Waste Management Act 1996 as Amended

Golder Associates allege, on behalf of Brownfield Restoration Ireland Limited, that their proposal is in accordance with the Section 60 Guidance Note issued by the Minister on 03 May 2005 which recommends a risk assessment approach.

While we would accept that the Guidance Note refers to risk assessment, it does so principally where the holder of waste may leave waste *in situ*. In such a case, the holder of the waste must carry out, or arrange for the carrying out, of a risk assessment to determine the environmental impact, if any, of the waste is illegally deposited.

However, the main thrust of the Guidance Note is to encourage an intensification of action against illegal waste activity and especially to eliminate the economic benefit deriving from the illegal activity. The aim in all cases should be the making safe of an unauthorised landfill site, especially sites on lands near existing or planned residential development, wetlands, natural heritage areas, candidate special areas of conservation or special protected areas, and places of interest such as high amenity areas. The Whitestown site falls into the category of sites which require the removal, in the shortest practicable time, of all waste except where it can be shown that an alternative solution provides greater protection to the environment and to the health of the local population.

3.6 Risk Assessment Model Presented by Golder Associates

The risk assessment is presented by Golder Associates as an attachment to their objection. The model is a purely mathematical construct, depending on probability analysis for the output and, while it has the advantage of being able to simulate conditions over a very long time period, it is still very reliant on input parameters. Furthermore, the model report states that "*the Whitestown Lower landfill development will accept residual wastes from treatment and construction and demolition wastes, commercial and industrial and domestic wastes (non-hazardous or residual waste)*" (Section 4.3, page 7). The proposed treatment processes which are used for the basis of the model are described in Section 2 of the March 2004 EIS; however, as we have noted above, this EIS is significantly outdated by the new proposals for the Whitestown site put forward by Brownfield Restoration Ireland Limited.

Another significant assumption is that the waste arriving at the landfill will have biodegradable material removed as much as possible, and the resultant wastes are envisaged to be similar in composition to those accepted by the KTK landfill in Kilcullen.

The major fault in these assumptions is that partly treated construction, demolition, commercial, industrial and domestic wastes are likely to contain

far less water than the previously deposited unauthorised wastes which Brownfield Restoration Ireland Limited propose to deal with at Whitestown. These unauthorised wastes, some of which have been in situ for more than five years in saturated sand and gravels, will themselves be saturated with high levels of water present. Therefore, leachate is likely to be much more in volume than that used in the model. Other inputs to the model which would be incorrect because of the unique circumstances at Whitestown are the porosity of the waste, the dry density of the waste and the final waste thickness. Most of these basic terms can be specified in the case of a "normal" landfill receiving wastes from domestic and commercial sources. In the case of Whitestown, the parameters of the waste underlying the sand and gravel have not yet fully determined; and these wastes are likely to be quite different in nature from wastes which would be imported to the usual or normal type landfill.

3.7 Restoration of the Site

We fully support the contention by other objectors that the site must be restored within an agreed and fixed time-scale, and that the restoration should leave the site usable as agricultural land, or some similar use suitable for the local environment, such as forestry.

3.8 Concluding Remark

In general, we agree with the issues raised and the suggestions made by the other third party objectors listed in section 1 above, and we urge the Agency to make no changes in the Proposed Decision which would allow the importation of wastes, or which would permit any semi-permanent or permanent structures on the Whitestown site.

Jack O'Sullivan
Environmental Management Services
on behalf of the
Whitestown Awareness Group

05 June 2006

Subobj (4)

Ann Bosley

From: Wexford Receptionist
Sent: 07 June 2006 09:27
To: Ann Bosley
Subject: FW: Observations re Proposed Decision 204-1 Whitestown
Attachments: Whitestown-061 Observations to EPA 05-Jun-06.pdf

Ann,
 rec'd today at info. (This was held overnight due to images attached and released by IT this morning).

Thanks Ann.

Ann Rochford,
 Programme Officer
 Environmental Protection Agency,
 An Ghníomhaireacht um Chaomhnú Comhshaoil,
 P.O. Box 3000,
 Johnstown Castle Estate,
 County Wexford.
 Bosca Poist 3000,
 Eastát Chaisleán Bhaile Sheáin,
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 Locall: 1890 335599

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From: Jack O'Sullivan [mailto:jackosullivan@eircom.net]
Sent: 06 June 2006 17:12
To: Web info mail
Subject: Observations re Proposed Decision 204-1 Whitestown

Dear Sir,

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07/06/2006

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Telephone 044 966 2222 Fax 044 966 2223 E-mail jackosullivan@eircom.net

Ta an ríomhphost seo mar aon le gach comhad a sheoltar i dteannta leis faoi run agus is don duine no don aonán e a bhfuil a ainm luaite leis agus sin amháin. Ma fuair tu an ríomhphost seo tri earraid, teigh i dteagmhail leis an mbainisteoir corais le do thoil.

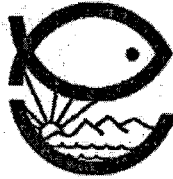
Deimhniú an fo-nota seo freisin go bhfuil an teachtaireacht ríomhphost seo scuabtha le bogearraí frithvireas chun viris ríomhaire a aimsiú.

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Jack O'Sullivan.

Jack O'Sullivan

Environmental Management Services

on behalf of the Whitestown Awareness Group

ENVIRONMENTAL MANAGEMENT SERVICES

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Golder Associates also point out that if Condition 1.4 is left unaltered, thereby prohibiting the importation of any waste onto the Whitestown facility, a considerable void space would be left in the quarry, resulting in significant on-going risks to the environment, and a liability to the owner, and there is a considerable risk that further unauthorised disposal of wastes could occur on the site at any time in the future.

Finally, Golder Associates take issue with the EPA about the timing of the release of documents in relation to the application; and they point out that the NIMBY syndrome is particularly well developed in Ireland in relation to waste facilities, and *"the leaking of documents, such as occurred in relation to this application, only serve to heighten these attitudes"*.

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The submission by Golder Associates dated 03 May 2006 on behalf of Brownfield Restoration Ireland Limited states that the *"applicant has amended its original proposal ... and does not now propose to develop a facility for the processing, recovery and disposal of wastes currently arising"*. Instead, the *"applicant's focus is now on the remediation of the existing unauthorised waste sites in County Wicklow and adjoining areas"*.

We would submit that this change from the applicant's original proposal is a substantial and material change, affecting not only the Whitestown site but a number of other unspecified waste disposal sites in County Wicklow and other counties. Therefore, the applicant's EIS is inappropriate and inadequate in that it fails to set out how the new proposal will affect the environment. From a planning perspective, it is clear that the changes in the proposed development described by Golder Associates should require a new planning application and a new Waste Licence Application. Therefore their application now before the Agency should be rejected, and the applicant should be instructed to make a new application (if he so wishes).

3.2 Structures on Site

We agree fully with the Chrysalis Centre, An Taisce and with Peter Walton and Florence Staunton that the construction of lagoons and buildings (even for the purpose of sorting or recovering wastes) should not be permitted on the Whitestown site. If such buildings were permitted, their presence would increase the risk and possibility of the site being used as a location for the processing of wastes imported from other unauthorised landfill sites in County Wicklow. Even if such importation were prohibited at present (as in the case

of the present Proposed Waste Licence), a subsequent licence application could be made by Brownfield Restoration in the expectation that such an application would be treated more favourably.

Furthermore, by preventing (under an appropriate condition of the waste licence) the construction of permanent structures (such as lagoons or buildings), the remediation of the site and its restoration to agricultural land could proceed more quickly than if buildings and other structures first had to be demolished and removed.

3.3 Operational Hours and Nuisance

We fully agree with the point made by Emer and Russ Bailey that operational hours at the Whitestown Lower site should be significantly restricted under the final waste licence.

As the Agency will be aware, Whitestown Lower is a rural area, and one of the nearest buildings is a holistic and meditation centre, relying for its continuous business on a quiet and unspoiled environment. The operation of machinery a short distance away would seriously injure residential and other amenities, and it is our submission that the operational hours should be restricted (as suggested by Emer and Russ Daily) to between 0800 and 1800 on week-days and from 0800 to 1300 on Saturdays. If the Agency accepts the suggestion by Wicklow County Council that there should be no composting on site, this would have the additional advantage of removing a further source of noise and nuisance.

3.4 Composting of Residual Wastes on Site

Wicklow County Council has made the valid point that none of the organic wastes present within the unauthorised waste mass would be suitable for composting at this stage, since they have been buried in the ground for more than 5 years. We would agree that there would be serious difficulties in composting this organic waste; firstly, its composition is unknown, it is likely to be seriously degraded by decomposition processes which have been ongoing for more than five years, it will not contain the necessary nutrients required to support the microbial flora which carry out the composting processes, and, when disturbed and laid out in windrow formations for composting, this waste could give rise to serious noxious odours.

The suggestion that these residual organic wastes should be composted in-vessel is more acceptable, provided that noise levels can be kept to a minimum, especially at night when noise levels are low in this rural area.

We therefore agree with the suggestion by Wicklow County Council that composting should be omitted from the authorised processes listed in Schedule A and that the compost facility should not be included in Schedule D: List of Specified Engineering Works.

3.5 Compliance with Department of the Environment Circular WIR 04/05 On Policy Pursuant to Section 16 of the Waste Management Act 1996 as Amended

Golder Associates allege, on behalf of Brownfield Restoration Ireland Limited, that their proposal is in accordance with the Section 60 Guidance Note issued by the Minister on 03 May 2005 which recommends a risk assessment approach.

While we would accept that the Guidance Note refers to risk assessment, it does so principally where the holder of waste may leave waste *in situ*. In such a case, the holder of the waste must carry out, or arrange for the carrying out, of a risk assessment to determine the environmental impact, if any, of the waste is illegally deposited.

However, the main thrust of the Guidance Note is to encourage an intensification of action against illegal waste activity and especially to eliminate the economic benefit deriving from the illegal activity. The aim in all cases should be the making safe of an unauthorised landfill site, especially sites on lands near existing or planned residential development, wetlands, natural heritage areas, candidate special areas of conservation or special protected areas, and places of interest such as high amenity areas. The Whitestown site falls into the category of sites which require the removal, in the shortest practicable time, of all waste except where it can be shown that an alternative solution provides greater protection to the environment and to the health of the local population.

3.6 Risk Assessment Model Presented by Golder Associates

The risk assessment is presented by Golder Associates as an attachment to their objection. The model is a purely mathematical construct, depending on probability analysis for the output and, while it has the advantage of being able to simulate conditions over a very long time period, it is still very reliant on input parameters. Furthermore, the model report states that "*the Whitestown Lower landfill development will accept residual wastes from treatment and construction and demolition wastes, commercial and industrial and domestic wastes (non-hazardous or residual waste)*" (Section 4.3, page 7). The proposed treatment processes which are used for the basis of the model are described in Section 2 of the March 2004 EIS; however, as we have noted above, this EIS is significantly outdated by the new proposals for the Whitestown site put forward by Brownfield Restoration Ireland Limited.

Another significant assumption is that the waste arriving at the landfill will have biodegradable material removed as much as possible, and the resultant wastes are envisaged to be similar in composition to those accepted by the KTK landfill in Kilcullen.

The major fault in these assumptions is that partly treated construction, demolition, commercial, industrial and domestic wastes are likely to contain

far less water than the previously deposited unauthorised wastes which Brownfield Restoration Ireland Limited propose to deal with at Whitestown. These unauthorised wastes, some of which have been *in situ* for more than five years in saturated sand and gravels, will themselves be saturated with high levels of water present. Therefore, leachate is likely to be much more in volume than that used in the model. Other inputs to the model which would be incorrect because of the unique circumstances at Whitestown are the porosity of the waste, the dry density of the waste and the final waste thickness. Most of these basic terms can be specified in the case of a "normal" landfill receiving wastes from domestic and commercial sources. In the case of Whitestown, the parameters of the waste underlying the sand and gravel have not yet fully determined; and these wastes are likely to be quite different in nature from wastes which would be imported to the usual or normal type landfill.

3.7 Restoration of the Site

We fully support the contention by other objectors that the site must be restored within an agreed and fixed time-scale, and that the restoration should leave the site usable as agricultural land, or some similar use suitable for the local environment, such as forestry.

3.8 Concluding Remark

In general, we agree with the issues raised and the suggestions made by the other third party objectors listed in section 1 above, and we urge the Agency to make no changes in the Proposed Decision which would allow the importation of wastes, or which would permit any semi-permanent or permanent structures on the Whitestown site.

Jack O'Sullivan

Environmental Management Services

on behalf of the

Whitestown Awareness Group

05 June 2006