

Eastern Regional Fisheries Board

Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
Our Natural Heritage

ENVIRONMENTAL PROTECTION

AGENCY

3 1 MAY 2006

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

Your Reference: 222-01 Our Reference: BB/DD/270

May 29th, 2006

Re: Proposed Greenclean Waste Management Ltd Recycling Park at Blakescross – Further Information. 40222-01

Dear Miss O'Keefe.

In relation to the above proposed development and your correspondence dated April 28th 2006, please find the Board's comments outlined below:

- The Ballough River, which forms a boundary to the east of the site and drains into Rogerstown estuary, is a Salmonid channel which is confirmed by our qualitative data. Precautions need to be taken to protect this system. An adequate buffer zone between the development and stream is essential to prevent any surface run-off into the stream during the construction and operation phase. Good housekeeping measures should also be implemented to prevent excessive turbid run-off to surface water systems. The installation of petrol/oil interceptors as planned will also be essential.
- Ground preparation and associated construction works, including large-scale topographic alteration and the creation of roads and buildings (as proposed), have significant potential to cause the release of sediments and pollutants into surrounding watercourses. Pollution of the adjacent freshwaters from poor on-site construction practices could have a significantly negative impact on the fauna and flora of this freshwater system. A comprehensive and integrated approach for achieving surface water protection during plant construction and operation should be implemented as described in the EIS.
- Substantial potential exists for pollution of local surface waters as a result of foul water loadings from this development.

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It should be noted that any waste recycling activities must not have a negative impact on the quality of surface waters and or salmonid habitats in the Ballough catchment.

- It is recommended that the "Requirements for the Protection of Fisheries
 Habitat during Construction and Development Works at River Sites"
 (http://www.fishingireland.net/erfb/protect.htm) be consulted when
 undertaking any works on this site, particularly in the vicinity of surface
 water features. The Board requests that it be informed at least 3-4 weeks
 in advance of any diversion work to be carried out during channel
 alterations of any kind.
- Monitoring of the biological quality of the Ballough River will be essential to verify effectiveness of pollution preventative measures. The surface water monitoring programme should provide for a visual inspection of any discharges and interceptors on a daily basis.

I trust you will take our observations on board when assessing this application.

Yours sincerely,

Pat Doherty \ Acting Chief Executive Officer