



Clashford Recovery Facility Ltd.,  
C/O J. Sheils Planning & Environmental Ltd.,  
31 Athlumney Castle,  
Navan,  
Co. Meath.

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22<sup>nd</sup> April 2009

**W0265-01**

Re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management  
(Licensing) Regulations

Dear Mr. Sheils,

I am to refer to the above referenced application for a waste licence relating to a facility at Naul Townland, Naul, Co. Meath. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 and Article 13 of the Waste Management (Licensing) Regulations.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to submit the information detailed below:

1. Quantity & Nature of Waste

(i) The Agency notes a discrepancy in the quantities of waste materials identified in the following sections of the application form:

- Table B.7.2 – Maximum Annual Tonnage: 180,000
- Table H.1 (A) Waste Types and Quantities: 200,000 (TPA)

Please clarify the maximum annual tonnage for the site and update the relevant sections of the application form as necessary.

(ii) Specify the quantity (TPA) of recycled aggregates expected to be exported offsite.

2. Submit a proposed testing regime for waste acceptance at the facility, having regard to EC Council Decision 2003/33/EC.

3. Waste Types

Wastes considered acceptable for recovery at a waste soils recovery facility are generally limited to uncontaminated natural soils, sub-soils, stone, and rock (EWC Code 17 05 04). Dredging spoil (EWC Code 17 05 06) is identified in the application form for use as backfilling material and track ballast (EWC Code 17 05 08) as material for recycling and use in on-site haul roads.



- (i) Identify the source and quantities of both the dredging spoil and track ballast.
  - (ii) Evaluate the leachate generation potential of the proposed waste streams, and justify the proposal to accept the requested waste types at this facility, having regard to the lack of engineered bottom/side liner to afford protection to underlying soils, groundwater and adjoining surface waters.
4. Assess the suitability and if necessary propose alternative locations for air and noise monitoring points A2-4 / N4 and A2-6 / N6 giving consideration to the proximity of the Kilsaran Concrete Batching Plant to the boundary of the site and the possibility of interference being detected at these monitoring locations.
  5. Investigate and determine the sources of elevated Arsenic, Chloride, Chromium, Iron, Lead, Phosphorus, Potassium and Sulphate detected in the surface water discharge (emission point SW-2), as reported in Attachment I of the licence application. Provide copies of certificates of analysis for all additional monitoring undertaken during this investigation.

Propose mitigation measures to minimise the discharge of such substances from the site.

6. Provide groundwater monitoring results from well GW-2 to enable a detailed assessment of the groundwater quality on site. Confirm whether GW-2 is currently the only active down gradient groundwater monitoring location for the site.
7. If available, please provide information regarding the location, design and operation of the proposed reed bed polishing filter for the site.
8. Confirm how often crushing activities are in operation at the site.
9. Provide written confirmation from the Planning Authority as to whether an Environmental Impact Statement (EIS) is required for the proposed development, having regard to the scale and duration of the activity (total capacity approximately 900,000 tonnes to be deposited over 5 years), and the fact that the projected annual acceptance of waste exceeds the 25,000 tonnes threshold for Environmental Impact Assessment in accordance with EC Environmental Impact Assessment Regulations 1989, as amended.

If an Environmental Impact Assessment is deemed necessary, please submit an EIS to the Agency in accordance with Article 13 of the Waste Management (Licensing) Regulations, 2004 to 2008.

Your reply should include a revised non-technical summary, which reflects the information you supply in compliance with this notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision, a revised drawing should be prepared in each case.



Please supply the information in the form of one original, plus one hardcopy format **within six weeks** of the date of this notice. In addition please submit two copies of the requested information in electronic searchable PDF format on CD-ROM to the Agency. Please note that all maps/drawings should not exceed A3 in size.

Where an EIS is required, please submit one original, plus one hardcopy, and fifteen copies in electronic searchable PDF format on a CD-ROM.

Please note that the application's register number is **W0265-01**. Please direct all correspondence in relation to this matter to *Administration, Licensing Unit, Office of Climate, Licensing & Resource Use, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Lisa Maher", is positioned below the "Yours sincerely," text.

Lisa Maher  
Inspector  
Office of Climate, Licensing & Resource Use