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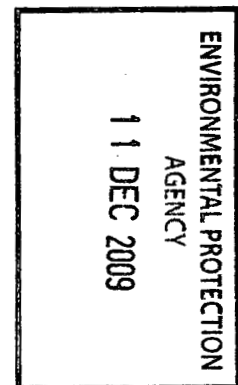
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Our Ref: ES/MMcD 2084/1a

8 December, 2009

Administration
Licensing Unit
Office of Climate Licensing and Resource Use
Environmental Protection Agency
Headquarters
PO Box 3000
Johnstown Castle Estate
Count Wexford



**RE: Waste Licence Application - W0256-01
Material Recovery Facility, Tallagh, Belmullet, County Mayo
Lennon Quarries Ltd.**

Dear Sir/Madam,

I am writing on behalf of our client Lennon Quarries Ltd. TOBIN (acting on behalf of Lennon Quarries Ltd.) issued an 'Application for a Waste Licence' to the EPA on 28 January 2009. The application relates to an existing Material Recovery Facility, at Tallagh, Belmullet, County Mayo, which is presently operating under Waste Permit (PER 144), from Mayo County Council.

TOBINs received a 'Notice in Accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations, 2004 to 2008' in relation to the above Waste Licence Application (W0256-01) from the EPA, dated 20 April 2009. The notice stated that the documentation submitted for the Waste Licence Application did 'Not Comply with Article 12 of the Waste Management (Licensing) Regulations' and as such requested that TOBINs, in compliance with Article 12 of the Waste Management (Licensing) Regulations, supply additional information to the EPA.

Directors: D.A. Downes (Chairman) L.E. Waldron (Managing Director) M.F. Garrick R.F. Tobin J. Colleran B.J. Downes S. Finlay P.J. Fogarty
D. Grehan J.P. Kelly B.M. Mulligan B. Murray C. O'Keeffe F. Renkema (Dutch) E.J. Harrigan (Company Secretary)

Associates: T. Cannon P. Cloonan D. Conneran M. Conroy T. Curran O. Downes B. Gaffney B. Gallagher B. Heaney
B. Hutchinson D. Kennedy M. McDonnell C. McGovern E. McPartlin G. Stevenson



Co. Reg. No. 42654 - Registered Office: Fairgreen House, Fairgreen Road, Galway, Ireland.

TOBIN issued a first response to the above request on 17 June 2009 (having agreed to this extended submission date with Ms Aoife Loughnane, EPA Inspector for the Waste Licence Application).

Within the above response to the EPA (17 June 2009), **Request No. 2** was not fully closed out, as discussions with Mayo County Council, with regards to the planning status for the proposed facility were ongoing, at the time of the response. These discussions are now complete and TOBIN now wish to revise our responses to **Request No. 2, Request No. 4, Request No. 4(i), Request No. 6(i), Request No. 14** and **Request No. 15**. The revised responses are presented below. The remainder of the responses issued to the EPA on 17 June 2009 remain valid.

Request No. 2:

Provide written confirmation from the Planning Authority as to whether planning permission and/or an Environmental Impact Statement (EIS) is required for the proposed development, having regard to the scale and duration of the activity (total capacity approximately 600,000 tonnes to be deposited over 24 years), and the fact that the projected annual acceptance of waste is just under the 25,000 tonnes threshold for Environmental Impact Assessment (disposal of >25,000 tonnes requires an EIS in accordance with European Communities (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.

Firstly, in the Waste Licence Application (January 2009), it was stated in *Attachment B.3 - Planning Authority:*

We understand that the activities carried out under the existing Waste Permit (Mayo County Council - PER 144) and the proposed Waste Licence are exempt from Planning Permission, under:

Planning and Development Regulations, 2001:

Schedule 2,

Part 3 - Exempted Development - Rural

Class 11 - Land Reclamation

"Development consisting of the carrying out, on land which is used only for the purpose of agriculture or forestry, of any of the following works" -

Sub-Class (b):

"Land Reclamation"

Secondly, in the Waste Licence Application (January 2009), it was stated that an Environmental Impact Statement (EIS) was not required for the application under *S.I. No. 349/1989: European Communities (Environmental Impact Assessment) Regulations, 1989*, which states that: *'Disposal or recovery activity >25,000 tonnes per annum require an EIS'*. As the application proposes the recovery of 24,900 Tonnes per annum (i.e. < 25,000 Tonnes per annum), it was understood that an EIS was not required.

On receiving the Article 12 Notice from the EPA and in particular Request No. 2 above, Dr. Emma Sweeney, Senior Environmental Scientist, TOBINs, contacted (by telephone) Mr Iain Douglas, Senior Planner for Mayo County Council and put the question to him directly (i.e. "Would Planning Permission be required for the activity proposed under this Waste Licence Application"?). Mr. Douglas was aware of the Waste Licence Application, having received a similar request directly from the EPA.

Mr Douglas referred to Section 3 of the Planning & Development Act, 2000, which defines 'Development'. In particular, he referred to Section 3(2)(b)(iii), which states that where land is used for the deposition of 'Builders' Waste', then the use of the land shall be taken as having materially changed, i.e. it is a 'Development', which requires Planning Permission. Therefore, by reason of the type of materials proposed to be deposited on the site by the Waste Licence Application (i.e. including 'Builders' Rubble'), the proposed facility would not be exempt from planning permission.

Mr Douglas went on to state that 'Rural Land Reclamation' is exempt from planning permission under Planning and Development Regulations, 2001, Schedule 2, Part 3 - Exempted Development - Rural, Class 11 - Land Reclamation - "Development consisting of the carrying out, on land which is used only for the purpose of agriculture or forestry, of any of the following works" - .Sub-Class (b)- "Land Reclamation". Therefore, if only natural materials were being recovered at the site (i.e. materials proposed, minus all Builders Rubble), then the proposed recovery activities on the site would be exempt from planning permission.

As it was required by Request No. 2 that *'Written confirmation from the Planning Authority as to whether planning permission and/or an Environmental Impact Statement (EIS) is required for the proposed development'*, TOBIN issued a request in writing to Mayo County Council Planning Department on 19 May 2009 (under Section 5(1) of the Planning & Development Act, 2000) for a declaration on whether the development (proposed by Waste Licence Application W0256-01) is or is not exempt from Planning Permission. A copy of the *Section 5 Request* is attached in Appendix A.

This *Section 5 Request* also asked for an opinion from Mayo County Council Planning Department, as to whether an EIS would be required for the proposed Waste Licence Application.

The official Mayo County Council Planning Department response, dated 12 June 2009 to the *Section 5 Request* was received by TOBIN on Monday 15 June 2009, a copy of which is attached in Appendix B.

The Mayo County Council Planning Department response concludes:

"Mayo County Council does not consider the works on the site are exempted development and therefore would require planning permission".

The letter states that deposition of materials (as listed in the Waste Licence Application) would constitute a material change of use of the land, by reason of the type of materials to be deposited, i.e. including "Builders Rubble".

The letter goes on to state that the construction of a hardstand area and portocabin (as proposed by the Waste Licence Application) would also require planning permission.

Finally, the Mayo County Council Letter states that if Planning Permission is submitted, that due to the sensitive location of the site (adjoining a cSAC), due to the size of the proposed facility, and due to the proposed time frame, that an EIS would be required as part of the Planning Application.

TOBIN (acting on behalf of Lennon Quarries Ltd.) has had much consultation with Mayo County Council Planning Department since the above Mayo County Council Section 5 response. The outcome of these consultations is that deposition of materials, which could fall under the definition of 'Builders Rubble' or 'Industrial Waste' would constitute a material change of use under Section 3(2)(b)(iii) of the Planning & Development Act 2000, and would therefore not be exempt from planning permission.

Based on the above information, Lennon Quarries Ltd. have agreed to remove the following list of wastes (included in the original Application) from Waste Licence Application W0256-01:

1. Those wastes which could be defined as 'Builders Rubble':

EWC 17

Construction and Demolition Wastes: -

- EWC 17 01 01
Concrete
- EWC 17 01 02
Bricks
- EWC 17 01 03

Tiles & Ceramics

- EWC 17 01 07
Mixture of Concrete, Bricks, Tiles & Ceramics, other than those mentioned in 17 01 06
- EWC 17 05 06
Dredging Spoil, other than those mentioned in 17 05 05
- EWC 17 09 04
Mixed Construction & Demolition Wastes, other than those mentioned in 17 09 01, 17 09 02 & 17 09 03

2. Those wastes which could be defined as 'Industrial Waste':

EWC 01

Waste Resulting from Exploration, Mining, Quarrying, and Physical & Chemical Treatment of Minerals: -

- EWC 01 04 09
Waste Sand & Clay
- EWC 01 04 10
Dusty & Powdery Wastes, other than those mentioned in 01 04 07
- EWC 01 04 12
Tailings & Other Wastes from Washing & Cleaning of Minerals, other than those mentioned in 01 04 07 & 01 04 11

The only remaining waste types now proposed to be accepted and recovered at the facility (under Waste Licence Application W0256-01) is:

EWC 17

Construction and Demolition Wastes: -

- EWC 17 05 04
Soil & Stones, other than those mentioned in 17 05 03

TOBIN issued a letter to Mayo County Council Planning Section on 13 November 2009 (copy attached in Appendix C) requesting confirmation that if only the above waste type (i.e. Natural Soil & Stones) was to be accepted and recovered at the facility, that the facility would be exempt from planning.

Mayo County Council responded to the above letter on 18 November 2009 (copy attached in Appendix D). This response concludes:

I wish to inform you that the "deposition of natural soil and stones for the purpose of reclamation for agricultural purposes" does not constitute a material change in use of the land and such

deposition would be regarded as exempt development under Class 11 of the 2001 Planning & development Regulations.

Therefore, based on the above, TOBIN conclude that Planning Permission is not required for acceptance and recovery of 24,900 Tonnes/Annum of natural soil and stones (EWC 17 05 04) at the facility (subject to Waste Licence Application W0256-01) at Tallagh, Belmullet, Co. Mayo.

Based on the simplification of the facility (i.e. now only accepting one natural waste type), it is proposed to remove the plans to construct a hardstand area and portocabin (as proposed originally by the Waste Licence Application), which would have required planning permission.

Finally, TOBIN understand through consultation with Mayo County Council (see Appendix B) that if Planning Permission is not required for the facility, then an EIS will not be required.

Request No. 4:

Waste Types

Waste 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). As shown in the table below, a number of additional waste streams have been requested in the licence application.

EWC Code	Waste Description
01 04 09	Waste sand and clay
01 04 10	Dusty and powdery wastes, other than those mentioned in 01 04 07
01 04 12	Tailings and other wastes from washing and cleaning of minerals, other than those mentioned in 01 04 07 & 01 04 11
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles & Ceramics
17 01 07	Mixture of concrete, bricks, tiles & ceramics
17 05 06	Dredging spoil, other than those mentioned in 17 05 05
17 09 04	Mixed C&D wastes, other than those mentioned in 17 09 01, 17 09 02 & 17 09 03

As stated in response to Request No. 2 above, Lennon Quarries Ltd. have agreed to remove the following list of wastes types (included in the original Application) from Waste Licence Application W0256-01:

1. Those wastes which could be defined as 'Builders Rubble':

EWC 17

Construction and Demolition Wastes: -

- EWC 17 01 01
Concrete
- EWC 17 01 02
Bricks
- EWC 17 01 03
Tiles & Ceramics
- EWC 17 01 07
Mixture of Concrete, Bricks, Tiles & Ceramics, other than those mentioned in 17 01 06
- EWC 17 05 06
Dredging Spoil, other than those mentioned in 17 05 05
- EWC 17 09 04
Mixed Construction & Demolition Wastes, other than those mentioned in 17 09 01, 17 09 02 & 17 09 03

2. Those wastes which could be defined as 'Industrial Waste':

EWC 01

Waste Resulting from Exploration, Mining, Quarrying, and Physical & Chemical Treatment of Minerals: -

- EWC 01 04 09
Waste Sand & Clay
- EWC 01 04 10
Dusty & Powdery Wastes, other than those mentioned in 01 04 07
- EWC 01 04 12
Tailings & Other Wastes from Washing & Cleaning of Minerals, other than those mentioned in 01 04 07 & 01 04 11

The only remaining waste types now proposed to be accepted and recovered at the facility (under Waste Licence Application W0256-01) is:

EWC 17

Construction and Demolition Wastes: -

- EWC 17 05 04
Soil & Stones, other than those mentioned in 17 05 03

It is proposed to import the above uncontaminated natural inert materials and to recover the materials, by spreading them over the proposed site deposition area. This recovery of inert material on the site is proposed to have a 'Consequential benefit of improving the land for agricultural use'.

Request No. 4(i):

Please identify the sources and quantities of the proposed waste streams and their proposed function in the fill/deposition

As stated in the Waste Licence Application (January 2009), it is proposed to accept 24,900 Tonnes/annum at the Materials Recovery Facility. At the time of the Waste Licence Application, the wastes proposed to be accepted fell under EWC Groupings - EWC 01: Waste Resulting from Exploration, Mining, Quarrying, and Physical & Chemical Treatment of Minerals and EWC 17: Construction and Demolition Wastes.

Table H.1(ii) of the Waste Licence Application (January 2009), proposed that the breakdown on waste quantities accepted at the facility would be:

EWC 01: Waste Resulting from Exploration, Mining, Quarrying, and Physical & Chemical Treatment of Minerals:

(i.e.: sand, clays, tailings & silt from quarries)

- 575 Tonnes/Month
- 6,900 Tonnes/Year

EWC 17: Construction and Demolition Wastes:

(i.e.: soil, stones & dredging spoil)

- 1,500 Tonnes/Month
- 18,000 Tonnes/Year

However, as stated in response to Request No. 2 and Request No. 4 above, Lennon Quarries Ltd. have now agreed to remove the following list of wastes types (included in the original Application) from Waste Licence Application W0256-01:

1. Those wastes which could be defined as 'Builders Rubble':

EWC 17

Construction and Demolition Wastes: -

- EWC 17 01 01
Concrete

- EWC 17 01 02
Bricks
- EWC 17 01 03
Tiles & Ceramics
- EWC 17 01 07
Mixture of Concrete, Bricks, Tiles & Ceramics, other than those mentioned in 17 01 06
- EWC 17 05 06
Dredging Spoil, other than those mentioned in 17 05 05
- EWC 17 09 04
Mixed Construction & Demolition Wastes, other than those mentioned in 17 09 01, 17 09 02 & 17 09 03

2. Those wastes which could be defined as 'Industrial Waste':

EWC 01

Waste Resulting from Exploration, Mining, Quarrying, and Physical & Chemical Treatment of Minerals: -

- EWC 01 04 09
Waste Sand & Clay
- EWC 01 04 10
Dusty & Powdery Wastes, other than those mentioned in 01 04 07
- EWC 01 04 12
Tailings & Other Wastes from Washing & Cleaning of Minerals, other than those mentioned in 01 04 07 & 01 04 11

The only remaining waste type now proposed to be accepted and recovered at the facility (under Waste Licence Application W0256-01) is:

EWC 17

Construction and Demolition Wastes: -

- EWC 17 05 04
Soil & Stones, other than those mentioned in 17 05 03

Therefore, it is now proposed to accept 24,900 Tonnes/annum of natural soil and stones (*EWC 17 05 04 - Soil & Stones, other than those mentioned in 17 05 03*) at the Materials Recovery Facility.

The natural soil and stones will originate from a variety of sites where the natural overburden is being excavated and requires removal from the site.

Lennon Quarries Ltd. have an active Waste Collection Permit (WCP-MO-09-0276-01) which allows them to collect and transport the above listed/proposed waste type and transport them for recovery at the Materials Recovery Facility, subject to this Waste Licence Application. This Waste Collection Permit allows Lennon Quarries Ltd. to collect these waste types from the following Local Authority areas:

- Galway County Council;
- Galway City Council;
- Mayo County Council;
- Leitrim County Council;
- Roscommon County Council;
- Sligo County Council.

Lennon Quarries Ltd. propose to collect the agreed waste type from sites within these areas. However, it is not possible to identify the exact site locations at this time.

The natural soil and stones waste are proposed to be transported to the Materials Recovery Facility (subject to this Waste Licence Application) to allow the materials to be recovered by spreading them over the surface ware of the site. Whilst allowing these wastes to be recovered, the 2m raise in land level is also improving the quality of the land for future agricultural use (i.e. grazing or tillage).

Request No. 6:

Protection of Surface Waters and Groundwater

6(i)

Describe the existing or proposed arrangements necessary to give effect to Articles 3, 4, 5, 6 and 7 of Council Directive 80/68/EEC on the protection of groundwater against the risk of pollution by certain dangerous substances, and Article 6 of Council Directive 2006/118/EC on the protection of groundwater against pollution and deterioration.

Articles 3, 4, 5, 6 & 7 of Council Directive 2006/118/EC, refer to the protection of groundwater against pollution caused by certain dangerous substances. They state that in order to ensure the effective protection of groundwater in the community, it is necessary to prevent the discharge of substances in List I and limit the discharge of substances in List II, to groundwater. List I & II substances are listed in the Annex to the above EU Directive and are composed of toxic, persistent and bioaccumulable substances.

As stated in response to Request No. 2 and Request No. 4 above, Lennon Quarries Ltd. have now agreed to remove the following list of wastes types (included in the original Application) from Waste Licence Application W0256-01:

1. Those wastes which could be defined as 'Builders Rubble':

EWC 17

Construction and Demolition Wastes: -

- EWC 17 01 01
Concrete
- EWC 17 01 02
Bricks
- EWC 17 01 03
Tiles & Ceramics
- EWC 17 01 07
Mixture of Concrete, Bricks, Tiles & Ceramics, other than those mentioned in 17 01 06
- EWC 17 05 06
Dredging Spoil, other than those mentioned in 17 05 05
- EWC 17 09 04
Mixed Construction & Demolition Wastes, other than those mentioned in 17 09 01, 17 09 02 & 17 09 03

2. Those wastes which could be defined as 'Industrial Waste':

EWC 01

Waste Resulting from Exploration, Mining, Quarrying, and Physical & Chemical Treatment of Minerals: -

- EWC 01 04 09
Waste Sand & Clay
- EWC 01 04 10
Dusty & Powdery Wastes, other than those mentioned in 01 04 07
- EWC 01 04 12
Tailings & Other Wastes from Washing & Cleaning of Minerals, other than those mentioned in 01 04 07 & 01 04 11

The only remaining waste stream now proposed to be accepted and recovered at the facility is fully inert uncontaminated natural soil and stones. These materials (listed below) will not contain any Dangerous Substances, as listed in the Annex to Council Directive 2006/118/EC (i.e. - List I & List II substances).

EWC 17**Construction and Demolition Wastes: -**

- EWC 17 05 04
Soil & Stones, other than those mentioned in 17 05 03

There will be no direct discharge to groundwater from the proposed Waste Licenced Site. Any water that does percolate through the ground to the Water Table, will have to percolate through the 2m lift of imported inert natural soil & stones and the existing ground, before reaching the Water Table. It is more likely that any water on the site will be collected by the surface water drainage system, and directed towards the Clooneen River, through one of the five proposed settlement lagoons.

Article 6 of Council Directive 2006/118/EC, refers to measures to prevent or limit inputs of both hazardous and non-hazardous pollutants into groundwater. As stated above, the Waste Streams proposed to be accepted at the facility are fully inert uncontaminated soil and stones, containing no pollutants (either hazardous or non-hazardous). The strict 'Waste Acceptance Procedures' proposed by the Waste Licence Application (as discussed in Response to Request No. 5, in first response to the above EPA request on 17 June 2009), will ensure that wastes not authorised by the Waste Licence, will not be accepted at the facility. All wastes stored in the Waste Quarantine Area will be correctly managed to ensure that they do not cause any threat to the surrounding environment, including groundwater.

Request No. 14:

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

A Revised Non-Technical Summary (Revision C), which reflects the additional information supplied in this RFI Response is attached in Appendix E.

Request No. 15:

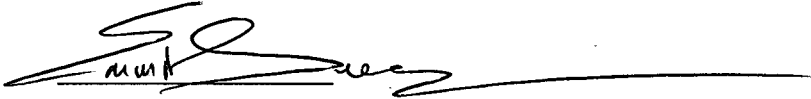
In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case.

Drawing No. 2084-2612 Rev. B - Existing & Proposed Site Infrastructure and Drawing No. 2084-2613 Rev. B - Proposed Emission Points were revised in order to remove the previously proposed concrete hardstand area and associated emission point EMPI (from originally proposed petrol interceptor) . The revised drawings are attached in Appendix F.

An updated 'Drawing Register' for the these revised drawings is attached in Appendix F.

I do hope the above adequately answers the outstanding requests made by the EPA in their 'Notice in Accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations, 2004 to 2008' in relation to Waste Licence Application (W0256-01), dated 20 April 2009. Should you have any further queries, please do not hesitate to contact me.

Yours sincerely,



Dr Emma Sweeney
Senior Environmental Scientist

cc. **Mr TJ Lennon, Lennon Quarries Ltd., Glencastle, Bunnahowen, Ballina, County Mayo**

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APPENDIX A

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Our Ref: ES/MMcD 2084/1a

19 May, 2009

Planning Department
Mayo County Council
Arás an Chontae
The Mall
CASTLEBAR
County Mayo

Re: **Application to the Environmental Protection Agency for a Waste Licence, EPA Reference W0256-01**
Lennon Quarries Ltd., Glencastle, Bunnahowen, Ballina, County Mayo
SECTION 5(1) PLANNING & DEVELOPMENT ACT, 2000

Dear Sir/Madam,

We are writing on behalf of our client, Lennon Quarries Ltd., Glencastle, Bunnahowen, Ballina, County Mayo, who applied to the Environmental Protection Agency (EPA) for a Waste Licence for the recovery of inert material on a site at Tallagh, Belmullet, County Mayo (which is located at National Grid Reference E470187 N8352292), on 28 January 2009. Notice was given to Mayo County Planning Department of the above Licence Application, in a letter dated 20 January 2009. This was done in accordance with the *Waste Management Acts, 1996 to 2003* and *Article 9 of the Waste Management (Licensing) Regulations, 2004 (S.I. No. 395 of 2004)*.

Lennon Quarries Ltd. received a - *Notice in Accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations, 2004 to 2008* from the EPA, dated 20 April 2009. The notice included the following request for information:

'Provide written confirmation from the Planning Authority as to whether Planning Permission and/or an Environmental Impact Statement (EIS) is required for the proposed development, having regard to the scale and duration of the activity (total capacity approximately 600,000

Directors: D.A. Downes (Chairman) L.E. Waldron (Managing Director) M.F. Garrick R.F. Tobin J. Colleran B.J. Downes S. Finlay P.J. Fogarty
D. Grehan J.P. Kelly B.M. Mulligan B. Murray C. O'Keeffe F. Renkema (Dutch) E.J. Harrigan (Company Secretary)

Associates: T. Cannon P. Cloonan D. Conneran M. Conroy T. Curran O. Downes B. Gaffney B. Gallagher B. Heaney
B. Hutchinson D. Kennedy M. McDonnell C. McGovern E. McPartlin G. Stevenson



tonnes to be deposited over 24 years), and the fact that the projected annual acceptance of waste is just under the 25,000 tonnes threshold for the Environmental Impact Assessment (disposal or recovery >25,000 tonnes requires an EIS in accordance with European Communities (Environmental Impact Assessment) Regulations 1989, as amended)'.

Therefore, in order to fulfil the above obligation to the EPA, we would now like to request in writing from Mayo County Council Planning Department (under Section 5(1) of the Planning & Development Act, 2005) a declaration on whether the development (proposed by EPA Waste Licence Application W0256-01) is or is not exempted development.

As stated in our Notice to you, dated 20 January 2009 (discussed above), we understand that the development (proposed by EPA Waste Licence Application W0256-01) is exempt under the:

Planning and Development Regulations, 2001

Schedule 2

Part 3 - Exempted Development - Rural

Class 11 - Land Reclamation

"Development consisting of the carrying out, on land which is used only for the purpose of agriculture or forestry, of any of the following works" -

Sub-Class (b):

Land Reclamation

As stated above, the EPA also requested as to whether an Environmental Impact Statement (EIS) is also required for the proposed development. We understand that the development does not require an EIS. It is not listed as a 'Development for the Purposes of Part 10', under Schedule 5 of the Planning & Development Regulations, 2001. Part 2(11)(b) of Schedule 5 of the Planning & Development Regulations, 2001, states the following development requires an EIS:

'Installations for the disposal of waste with an annual intake greater than 25,000 tonnes not included in part 1 of this Schedule'.

The development proposed in this Waste Licence Application refers to Recovery, rather than Disposal and the amount of material to be recovered at the facility is < 25,000 Tonnes/Annum. We would appreciate your opinion on this matter.

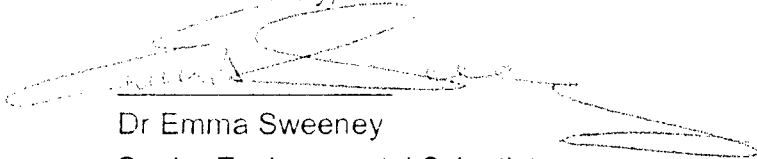
In order to allow you understand the development proposed under EPA Waste Licence Application W0256-01, please find attached in Appendix A a copy of the 'Non-Technical Summary & Associated Drawings' from the Waste Licence Application.

The full application is presently available for download from the EPA website.

Please find attached €80 cash being the prescribed fee (for a Section 5 Request) in this instance.

Should you wish to discuss the above, or should you require any additional information, please do not hesitate to contact me.

Yours sincerely,

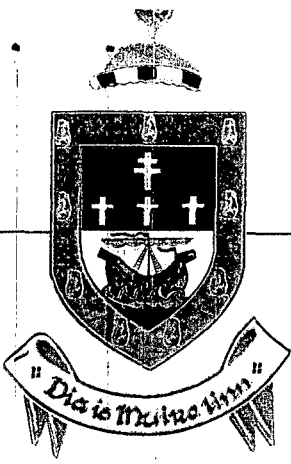


Dr Emma Sweeney
Senior Environmental Scientist

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APPENDIX B

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COMHAIRLE CHONTAE MHAIGH EO

Aras an Chontae, Caislean a 'Bharraigh, Chontae Mhaigh Eo.

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PLANNING OFFICE: TELEPHONE: 094 9047204 FAX: 094 9021694

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TOBIN CONSULTING ENGINEERS CASTLEBAR		
PROJECT NO.	2744	
FILE REF.	1a	
Date Received	15 JUN 2009	
PASS TO	ACTION BY	DATE
ESMENEY		

P09/494

12th June 2009

Re: Declaration under Section 5 for application to the Environmental Protection Agency for a Waste Licence, EPA Ref. WO256-01 at Glencastle, Bunnahowen, Ballina, Co. Mayo - Lennon Quarries Ltd

Dear Sir,

I refer to your request of a Declaration under Section 5 of the Planning & Development Act, 2000.

Mayo County Council wishes to point out having regard particularly to:

- (i) Sections 2,3 and 4 of the Planning and Development Act, 2000 and
- (ii) Article 6 (3) of the Planning and Development Regulations 2001 with particular reference to Class 11 of part 3 of Schedule 2 of these Regulations:

It is concluded that:

Mayo County Council does not consider the works on site are exempted development and therefore **would require planning permission.** It should also be noted that if a planning application is submitted, due to the sensitive location adjoining a cSAC area and the size and time frame involved, any application on site would require an Environmental Impact Statement.

Mayo County Council has concluded that said deposition of material on the land constitutes a material change of use of the land by reference to Section 3 (2) (b) (iii) of the Planning and Development Act 2000, by reason of the type of materials to be deposited. Also the construction of a hardstand area and the erection of proto cabins is considered development.

Therefore Mayo County Council considers that the said filling of lands and construction of a hardstand area **is not exempted development.**

Yours sincerely,


MARY K. LORAN COYNE, A.O.
PLANNING SECTION

Copy to: *Lennon Quarries Ltd, Glencastle, Bunnahowen, Ballina, Co. Mayo.*

ADL/CK

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APPENDIX C

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TOBIN

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Consulting Engineers

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Our Ref: ES/MMcD 2084/1a

13 November, 2009

Mr Iain Douglas
Senior Planner
Planning Department
Mayo County Council
Aras an Chontae
The Mall
CASTLEBAR
County Mayo

**Re: Application to the Environmental Protection Agency for a Waste Licence, EPA Reference W0256-01
Lennon Quarries Ltd., Glencastle, Bunnahowen, Ballina, County Mayo**

Dear Mr. Douglas,

I am writing on behalf of our client Lennon Quarries Ltd., Glencastle, Bunnahowen, Ballina, County Mayo, who applied to the Environmental Protection Agency (EPA) for a Waste Licence for the recovery of inert material on a site at Tallagh, Belmullet, County Mayo on 28 January 2009.

This office issued a Request (under Section 5 (1) of the Planning & Development Act, 2000) to Mayo County Council Planning Department, dated 19 May 2009, which requested a 'Declaration' from the Planning Department, on whether the development (proposed by EPA Waste Licence Application W0256-01) was or was not exempt from Planning Permission. The request also asked for confirmation as to whether an EIS would be required as part of the authorisation process for the facility.

The official response to the above request was issued by Mayo County Council Planning Section, dated 12 June 2009. The response concluded:

Directors: D.A. Downes (Chairman) L.E. Waldron (Managing Director) M.F. Garrick R.F. Tobin J. Collieran B.J. Downes S. Finlay P.J. Fogarty D. Grehan J.P. Kelly B.M. Mulligan B. Murray C. O'Keeffe F. Renkema (Dutch) E.J. Harrigan (Company Secretary)

Associates: T. Cannon P. Cloonan D. Conneran M. Conroy T. Curran O. Downes B. Gaffney B. Gallagher B. Heaney B. Hutchinson D. Kennedy M. McDonnell C. McGovern E. McPartlin G. Stevenson



Co. Reg. No. 42654 - Registered Office: Fairgreen House, Fairgreen Road, Galway, Ireland.

"Mayo County Council does not consider the works on the site are exempted development and therefore would require planning permission".

The response letter states that deposition of materials (as listed in the Waste Licence Application W0256-01) would constitute a material change of use of the land, by reference to Section 3(2)(b)(iii) of the Planning and Development Act 2000, by reason of the type of materials to be deposited. Section 3(2)(b)(iii) of the Planning and Development Act 2000 states (along with other information) that where land is used for the deposition of 'Builders' Waste', then the use of the land shall be taken as having materially changed (i.e. it is a 'Development which requires Planning Permission'). Therefore, by reason of the type of materials proposed to be deposited on the site by the Waste Licence Application (which included Builders Waste), the proposed facility would not be exempt from planning permission.

The letter goes on to state that the construction of a hardstand area and portocabin (as proposed by the Waste Licence Application W0256-01) would also require planning permission.

Finally, the Mayo County Council Response Letter states that if Planning Permission is submitted, that due to the sensitive location of the site (adjoining a CSAC), due to the size of the proposed facility, and due to the proposed time frame, that an EIS would be required as part of the Planning Application.

Following the above response, TOBIN issued a letter to Mr Iain Douglas, Senior Planner, Mayo County Council on 28 October 2009 requesting confirmation that if all waste types that would classify as 'Builders Rubble' (i.e. Concrete, Bricks; Tiles & Ceramics; Mixture of Concrete, Bricks, Tiles & Ceramics; Mixed Construction & Demolition Wastes; and Dredging Spoil) were removed from the Waste Licence Application, that recovery of the remaining wastes at the facility (i.e. Waste Sand & Clay from Quarries; Dusty & Powdery Wastes from Quarries; Tailings & Other Wastes from Washing & Cleaning of Minerals at Quarries; and Natural Soil & Stones) would be exempt from planning permission.

TOBIN received a letter from Mr Iain Douglas, Senior Planner, Mayo County Council, dated 06 November 2009, which stated that the quarry wastes proposed to be recovered at the facility (i.e. Waste Sand & Clay from Quarries; Dusty & Powdery Wastes from Quarries; and Tailings & Other Wastes from Washing & Cleaning of Minerals at Quarries) would constitute 'Industrial Wastes', the deposition of which would constitute a 'Material Change of Use', and would thus require planning permission.

Lennon Quarries Ltd. has applied for a Waste Licence to the EPA for the site at Tallagh, Belmullet, County Mayo, to allow recovery of natural materials, rather than having to send them to landfill for

disposal, whilst at the same time reclaiming the site for agricultural purposes. Therefore, Lennon Quarries Ltd. is now altering its Waste Licence Application to remove the proposals to accept the following waste types, which would classify as 'Builders Rubble': Concrete; Bricks; Tiles & Ceramics; Mixture of Concrete, Bricks, Tiles & Ceramics; Mixed Construction & Demolition Wastes; and Dredging Spoil, and the following waste types, which would classify as 'Industrial Wastes': Waste Sand & Clay from Quarries; Dusty & Powdery Wastes from Quarries; and Tailings & Other Wastes from Washing & Cleaning of Minerals at Quarries.

The only remaining waste type now proposed to be accepted at the 'Material Recovery Facility' under Waste Licence Application are W0256-01 is: Natural Soil & Stones.

This 'Waste Type' is an uncontaminated natural inert material.

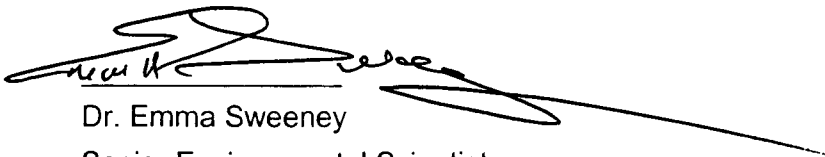
TOBIN understand (following our meeting on Monday last 09 November 2009) that by recovering only these natural materials at the site, that the proposed 'Material Recovery Facility' will be exempt from Planning Permission (under - *Planning and Development Regulations, 2001, Schedule 2, Part 3 - Exempted Development - Rural, Class 11 - Land Reclamation* - "Development consisting of the carrying out, on land which is used only for the purpose of agriculture or forestry, of any of the following works" - *Sub-Class (b)- "Land Reclamation"*). TOBIN understand that if exempt from Planning Permission, the completion of an EIS would not be required.

TOBIN now request written confirmation from Mayo County Council Planning Department on the above, at your earliest convenience.

With regards to the proposed construction of a hardstand area and portocabin (as proposed by the Waste Licence Application W0256-01, January 2009), which Mayo County Council Planning Department have stated would also require planning permission; it is now proposed to remove this infrastructure from the Waste Licence Application.

I look forward to hearing from you,

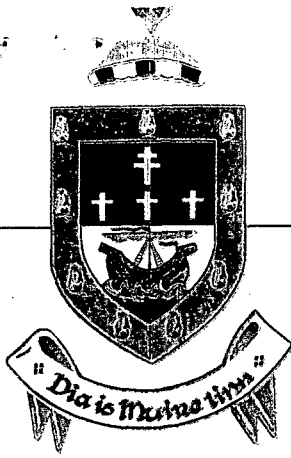
Yours sincerely,



Dr. Emma Sweeney
Senior Environmental Scientist

APPENDIX D

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COMHAIRLE CHONTAE MHAIGH EO

Aras an Chontae, Caislean a 'Bharraigh, Chontae Mhaigh Eo.
Teileafóin (094) 9024444 Fax (094) 9023937 Website: www.mayococo.ie

Your Ref.

TOBIN CONSULTING ENGINEERS CASTLEBAR		Our Ref.
PROJECT NO.	2094	18 th November 2009
FILE REF.	1a	
Date Received	20 NOV 2009	
PASS TO	ACTION BY	DATE
E Sweeney		

Dr Emma Sweeney,
Senior Environmental Scientist,
Patrick J Tobin & Co Ltd.,
Market Square,
Castlebar,
Co Mayo.

**Re: Application to the Environmental Protection Agency for a Waste Licence,
EPA Ref: W0256-01 – Lennon Quarries Ltd.**

Dear Dr Sweeney,

I refer to the above and to your letter received on the 16th November, 2009. I wish to inform you that the "deposition of natural soil and stones for the purposes of reclamation for agricultural purposes" does not constitute a material change in use of the land and such deposition would be regarded as exempt development under Class 11 of the 2001 Planning & Development Regulations.

Yours sincerely,

Iain Douglas S.P.
Planning & Development

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APPENDIX E

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NON-TECHNICAL SUMMARY

(REVISION C)

This Waste Licence Application is being made by Lennon Quarries Ltd., Glencastle, Bunnahowen, Ballina, Co. Mayo, telephone 097 81297, fax 097 81734, email tjlennon@lennonquarries.com. Lennon Quarries Ltd. is a body corporate, with its registered office at the above address. The company registration number is 263357. Lennon Quarries Ltd. are both the applicant and the operator of the facility, subject to this Waste Licence Application.

TOBIN Consulting Engineers (Contact – Dr. Emma Sweeney, Senior Environmental Scientist) ('TOBIN'), Market Square, Castlebar, Co. Mayo, telephone 094 9021401, fax 094 9021534, email emma.Sweeney@tobin.ie, have prepared this Waste Licence Application, on behalf of their client - Lennon Quarries Ltd. All correspondence relating to this Waste Licence Application should be directed towards TOBIN.

This application relates to a site at Tallagh, Belmullet, Co. Mayo, the location of which is shown on Drawing No. 2084-2600 and Drawing No. 2084-2601 (attached in 'Application Drawings', Tab 15). Two bench marks set up by TOBIN at the second entrance gate to the facility have the National Grid Reference E470040 N835694 (Bench Mark 1) and E470033 N835690 (Bench Mark 2), as shown on Drawing No. 2084-2603 (attached in 'Application Drawings', Tab 15). The site is owned by Erris Farm Services Co-Op Society Ltd., Chapel Street, Belmullet, but is on long-term lease to the applicant (Lennon Quarries Ltd.). The extent of the lands leased are shown on Drawing No. 2084-2602 (attached in 'Application Drawings', Tab 15).

The Waste Licence Application 'Site Layout Plan' is shown on Drawing No. 2084-2603 (attached in 'Application Drawings', Tab 15). The site has a total area of 27.22ha, which includes the site access road, the proposed area of deposition (20.48ha) and a proposed buffer zone in the northern section of the site (4.46ha), which separates the area of deposition from the Clooneen River, which flows in an easterly direction, along the northern boundary of the site.

This Waste Licence Application is for a 'Material Recovery Facility' at the site. Material Recovery is presently ongoing at the application site, under the

existing Mayo County Council Waste Permit PER 144 for the site, which was granted on 30 January 2006, in accordance with the relevant legislation at that time (Waste Management Act 1996 and the Waste Management (Permit) Regulations 1998). This permit expires on 29 January 2009.

The 1998 Waste Permit Regulations were revoked and replaced by the Waste Management (Facility Permit and Registration) Regulations 2007 and the Waste Management (Facility Permit and Registration) (Amendment) Regulations 2008 ('*New Legislation*'), which came into effect on 01 June 2008.

Under the *New Legislation*, the activity permitted under existing Waste Permit PER 144 does not fall within Part I of the Third Schedule, and therefore now requires a Waste Licence, in accordance with the Waste Management (Licensing) Regulations 2004 (S.I. No. 395 of 2004).

Therefore, it is not intended for Lennon Quarries Ltd. to submit a 'Waste Permit Review Application' with Mayo County Council. In compliance with the *New Legislation*, Lennon Quarries Ltd. are submitting this 'Waste Licence Application' with the EPA. The *New Legislation* requires that the 'Waste Licence Application' is lodged with the EPA within 180 working days of the coming into operation of the Waste Management (Facility Permit and Registration) Regulations 2007 (i.e. 13 February 2008), or before/on the expiry date of the existing Waste Permit (i.e. 29 January 2008), whichever is sooner. These dates have been confirmed by the EPA in a letter dated 16 October 2008.

By lodging the application within this timeframe, the existing Waste Permit (PER 144) will remain valid until such a time as the EPA either grant or refuse a Waste Licence. This interpretation of the legislation is also confirmed by the EPA in their letter dated 16 October 2008.

The Waste Licence Application Site is located within the functional area of Mayo County Council Planning Authority. Mayo County Council have confirmed (in a letter dated 18 November 2009) that - "*Deposition of natural soil and stones for the purpose of reclamation for agricultural purposes does not constitute a material change in use of the land and such deposition would be regarded as exempt development under Class 11 of 2001 Planning & Development Regulations*".

There is no discharge of trade effluent or other matter, to sewer (existing or proposed) from the Waste Licence Application site.

The works proposed under this Waste Licence Application involve the acceptance of a maximum of 24,900 Tonnes per annum of uncontaminated inert natural material (soil & stones) and its recovery, by spreading the material over the site deposition area, with a consequential benefit of improving the land for agricultural use.

Only one waste type is proposed to be accepted at the Waste Licence Facility and it falls under the following EWC Waste Category:

EWC 17

Construction and Demolition Wastes: -

EWC 17 05 04

Soil & Stones, other than those mentioned in 17 05 03

Therefore, it is proposed to accept 24,900 Tonnes/annum of natural soil and stones (*EWC 17 05 04 - Soil & Stones, other than those mentioned in 17 05 03*) at the Materials Recovery Facility.

The activity proposed in this Waste Licence Application is not an establishment to which the European Communities (Control of Major Accident Hazards involving Dangerous substances) Regulations, 2000 (S.I. No. 476 of 2000), will apply, as all materials to be accepted at the proposed facility are uncontaminated inert natural materials.

The class/classes of activity (in accordance with the Third Schedule or Fourth Schedule to the Waste Management Acts 1996 to 2003), to which this Waste Licence Application relates are presented below.

The '**Principle Activity**' to be undertaken is covered by:

Class 4 of the Fourth Schedule of the Waste Management Acts 1996 - 2003:

"Recycling or reclamation of other inorganic materials".

This application concerns the recovery/reclamation of uncontaminated inert natural material (i.e.: natural soil & stones) and its recovery, by spreading the material over the site area, with a consequential benefit for improving the land for agricultural use.

The proposed activities are also covered by:

Class 13 of the Fourth Schedule of the Waste Management Acts 1996 - 2003:

"Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced".

This activity allows for the storage of incoming uncontaminated inert natural material (i.e.: natural soil & stones) before it is reclaimed by spreading the material over the site area.

Drawing No. 2084-2607 (Attached in 'Application Drawings', Tab 15) presents the '*Existing Topographic Map of Application Site*'. This application for a Waste Licence, proposes to raise the level of the site by 2m, by spreading out the accepted uncontaminated inert natural materials (soil & stones) (24,900 Tonnes/Annum) over the surface of the 'Area of Deposition'. Drawing No. 2084-2608 - (Attached in 'Application Drawings', Tab 15), shows the '*Proposed Topographic Map of Application Site, Showing Final Ground Levels*' (i.e. with proposed 2m Land Raise shown). Cross Section Locations A-A, B-B, C-C, D-D & E-E are shown on Drawing 2084-2607 & Drawing No. 2084-2608 (Attached in 'Application Drawings', Tab 15), with the Cross Sections presented on Drawing No. 2084-2609, Drawing No. 2084-2610 & Drawing No. 2084-2611 (Attached in 'Application Drawings', Tab 15). The Cross Sections clearly show the Land Raise by 2m, with a slope of 3:1 down to all existing perimeter surface water drains, which will remain untouched. The existing open surface water drains that cut through the Area of Waste Deposition, will also be raised by 2m, as shown on the Cross Section Drawings.

To allow for a proposed 2m Land Raise, it was calculated that a total of 373,039m³ of material would have to be accepted/recovered at the facility. Using a density for natural soil & stones of 1.6 Tonnes/m³, it was calculated that 596,862.5 Tonnes Waste would have to be accepted at the facility for recovery/reclamation. Based on an annual intake of 24,900 Tonnes/Annum, it is calculated that the facility will be active for 24 Years (i.e. 2010 - 2033).

The 'Proposed Hours of Operation' for the facility are 8.00am to 6.00pm - Monday to Friday, 8.00am to 2.00pm - Saturday, and Closed on Sundays & Bank Holidays. The 'Proposed Hours of Waste Acceptance/Handling' are 8.30am to 5.30pm - Monday to Friday, 8.30am to 1.30pm - Saturday, and Closed on Sundays & Bank Holidays. The difference between the 'Proposed Hours of Operation' and the 'Proposed Hours of Waste Acceptance/Handling' reflect the time allowed for set-up and clean up works each day.

Under the existing Waste Permit PER 144 for the facility (which has been active since January 2006, and will remain active until a decision is made on this Waste Licence Application) and under the proposed Waste Licence for the facility, only one piece of plant equipment will be used onsite. The Hitachi 200 excavator is being and will continue to be used intermittently throughout the day/week.

It is proposed to develop a hardcore area (with a surface dressing of clean broken stone), close to the entrance gate, as shown on Drawing No. 2084-2612 Rev. B (attached in Correspondence to EPA, 08 December 2009). This will allow haulage trucks to enter the site, turn, and deposit their material, along the perimeter of the hardcore area.

The Deputy Facility Manager/Machine Operative will inspect each load, as it is being deposited, to ensure the material is fully compliant with the Waste Licence. If the material is non-compliant, the Deputy Facility Manager/Machine Operative will insist that the material is reloaded onto the haulage truck and removed from the site, for authorised disposal elsewhere.

Once the haulage trucks deposit their material, along the perimeter of the hardcore area, the excavator will shift the inert material, from where it is deposited by the haulage trucks, and spread it over the area of the deposition site, in compliance with the Waste Licence Application Drawings (attached in 'Application Drawings', Tab 15). If waste objects are identified within the inert material (whilst shifting/reclaiming the material), which are not compliant with the Waste Licence (eg. pieces of concrete, tiles, wood, plastic, metal, etc.), they will be removed and transported to the Waste Quarantine Skip.

The waste deposition at the site is proposed to be carried out in 3 No. Phases, as shown on Drawing No. 2084-2615 (attached in Correspondence to EPA, 17 June 2009). During Phase 1, the machine driver will fan out the acceptable material concentrically over the area of Phase 1. Once Phase 1 is complete, the acceptable material will be fanned out over Phase 2, for a 2m lift. Finally, when Phase 2 is complete, the incoming material will be transported over the area of Phase 1 & 2, to be deposited over the Phase 3 area, again to be fanned out for a 2m lift.

All perimeter surface water drains will remain untouched, with the 2m land raise rising up at a slope of 3:1 from the top of the drains. The existing open surface water drains which cut through the Area of Waste Deposition, will be retained, but will also be raised by 2m, as shown on Cross Section Drawings 2084-2609, 2084-2610 & 2084-2611 (attached in 'Application Drawings', Tab 15).

The Deputy Facility Manager/Machine Operative will carry out a 'Basic Characterisation' of the waste on arrival and keep a record of all material arriving at the facility, including the following information:

- Date;
- Time;
- Owner Truck;
- Truck Licence Plate No.;
- Origin of Material;
- Process which Produced the material;
- Appearance of the material;
- Odour from the Material;
- Type of Material (according to European Waste Codes (EWC));
- Quantity of Material;

It is proposed to carry out 'Compliance Testing' on a composite sample of waste received at the proposed Waste Licenced Facility on an annual basis. The results will be compared to the 'Limit Values for Waste Acceptable at Landfills for Inert Waste' (although strictly not a 'Landfill'), as presented in Section 2.1.2 of the Annex to The EC Council Decision 2003/33/EC.

It is not proposed to install a weighbridge at the facility. Based on the proposed annual intake of 24,900 Tonnes, it is expected that there will be approximately 1,245 truckloads of inert material delivered to the site on an annual basis (i.e. ca. 25 loads per week). This small quantity of truck arrivals does not justify the expense of installing a weighbridge. Also, all natural inert soil & stones arriving at the facility will be delivered in haulage trucks owned and operated by Lennon Quarries Ltd. (under Waste Collection Permit WCP-MO-09-0276-01). The Deputy Facility Manager/Machine Operative on the Waste Licensed site will have a record of the capacity of each of the trucks, which will allow him to keep an accurate record of volumes/quantities of inert materials being accepted at the facility on a daily basis.

The only fuels required at the proposed Waste Licence Site will be Diesel (ca. 100 Litres/week) and Hydraulic Oil (ca. 40 Litres/Annum), to run the onsite plant (Hitachi 200 excavator). It is not proposed to store any fuel onsite. A fuel tanker will visit the site, when required and fill the onsite plant (Hitachi 200 excavator).

The raw material - broken stone will be accepted at the facility to complete construction of the proposed broken stone hardcore turning area for trucks

(inside the main entrance gate). These works are proposed to be completed within the first two working weeks of the Waste Licence being granted. Following these works, it is not expected that any other 'Raw Materials' will be accepted at the facility.

No chemicals (e.g. Insecticides, Herbicides, Rat Poisons, Cleaning Agents, Water Treatment Chemicals, Cooling Water/Boiling Water Additives, Laboratory Chemicals, etc.) will be required or accepted at the facility.

The only 'Energy' proposed to be used at the facility will be that to run the facility plant (Hitachi 200 excavator). To ensure energy efficiency, the facility plant engine will be switched off when not in use. Based on the above, it is anticipated that the proposed facility will be very energy efficient.

There are/will be no emissions to sewer or groundwater from the facility. The only noise emission from the site will be the one piece of mobile plant (Hitachi 200 excavator). There are/will be 5 no. surface water emissions from site surface water drainage system to the Clooneen River (as shown on Drawing No. 2084-2613 Rev. B, attached in Correspondence to EPA, 08 December 2009). The only emissions to atmosphere will be from the exhaust of the mobile plant and haulage trucks arriving/departing the site, and of dust from the unloading, stockpiling and movement of the inert waste for recovery, around the site.

'Treatment, Abatement and Control Systems' are proposed to be put in place to ensure the above listed emissions from the facility will not result in the contravention of any environmental standard. These measures include: construction of 5 no. Settlement Ponds on all drainage channels prior to their discharge from the site (all of which are shown, with their associated areas of contribution, on Drawing No. 2084-2614 Rev. B, attached in Correspondence to EPA, 17 June 2009), the regular servicing of facility plant to ensure that noise and exhaust emissions are kept to a minimum, and the use of a tractor with water bowser to dampen down dust from the facility during periods of extended dry weather.

Six No. 'Surface Water Monitoring' locations are proposed on the Clooneen River, as shown on Drawing No. 2084-2606 Rev. B (attached in Correspondence to EPA, 17 June 2009). One is located upstream of the site, and the remaining five are located directly downstream of each of the surface water emission points to the Clooneen River. This will allow the surface water being emitted from the site (following the settlement lagoons) to be strictly

monitored. Monitoring of 'Settlement Dust' at 3 no. locations around the site boundary, on a biannual basis is proposed. Monitoring of 'Noise' at 3 no. locations around the site boundary, and at 2 no. noise sensitive locations (i.e. the two closest houses), is proposed on an annual basis. The locations of all proposed monitoring locations, are shown on Drawing No. 2084-2606 Rev. B (attached in Correspondence to EPA, 17 June 2009).

The main accidents of concern for the facility subject to this Waste Licence Application are an accidental fuel spillage, or a fire at the facility. Necessary measures to be taken to prevent these accidents occurring, and actions to be taken should an accident occur will be provided to all personnel on the site in the form of 'Accident Prevention & Emergency Response' Report.

Due to the simple process of material recovery/reclamation proposed for the facility, very little remediation or decommissioning will be required. The site is expected to revegetate naturally and abatement measures to ensure surface water leaving the site has a chance to settle (i.e. deposit suspended solids), in the form of 5 no. Settlement Ponds will be left in place following closure of the facility.

The Applicant - Lennon Quarries Ltd. is a 'Fit & Proper Person', complying with all of the requirements of Section 40(7) of the Waste Management Acts 1996 to 2003'.

The applicant (Lennon Quarries Ltd.), or any person working for the applicant, have not been convicted of an offence under the Waste Management Acts 1996 to 2003, the EPA Act 1992 and 2003, the Local Government (Water Pollution) Acts 1977 and 1990 or the Air Pollution Act 1987.

Although Mr. Thomas J. Lennon and his employees (particularly those named in the 'Management Structure') have no direct qualifications in relation Waste Management, all have gained valuable technical knowledge through working in the area for many years, under the existing Mayo County Council Waste Collection Permit (CW276) and Waste Facility Permit (PER 144).

Lennon Quarries Ltd. are in a position to meet any financial commitments or liabilities that the Agency reasonably considers will be entered into or incurred by him or her in carrying on the activity to which the waste licence will relate in accordance with the terms thereof or in consequence of ceasing to carry on that activity. A letter confirming the above from Lennon Quarries Ltd. bank is attached in the Waste Licence Application.

APPENDIX F

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TOBIN
Patrick J. Tobin & Co. Ltd.

Lennon Quarries Ltd.
Glencastle, Bunnahowen, Ballina, Co. Mayo

PROJECT NO:	12084
SHEET:	1

DRAWING REGISTER & RECORD OF DRAWINGS ISSUED

DISTRIBUTION				EM=ISSUED BY EMAIL, CD= ISSUED BY CD, #=NUMBER OF HARDCOPIES					
CATEGORY	ORGANISATION	CONTACT NAME	GI	1	1	1	1	1	
Client	Lennon Quarries Ltd.	Mr. TJ Lennon							
		Allison Auston		EM					
Government Organisation	EPA	Waste Licence Section			2	2	2		
Local Authority	Mayo County Council - Planning				1				

STATUS: D=DRAFT, P=PLANNING, DS=DESIGN STAGE, T=TENDER, C=CONSTRUCTION

DWG. No:	DRAWING TITLE	SIZE	SCH	Current Revision	DATE OF ISSUE								
					Day	Month	Year	22	05	27	19	17	08
					Issued by	12	01	01	05	06	12		
						08	09	09	09	09	09		

DWG. No:	DRAWING TITLE	SIZE	SCH	Current Revision	22	05	27	19	17	08
2084-2600	Site Location - Map 1	A3		A	D-01	A	A			
2084-2601	Site Location - Map 2	A3		A	D-01	D-01	A	A		
2084-2602	Site Ownership Map	A3		A	D-01		A	A		
2084-2603	Site Layout Plan	A3		A	D-01		A	A		
2084-2604	Services Plan	A3		A	D-01		A			
2084-2605	Location of Site Notice	A3		A	D-01		A			
2084-2606	Proposed Environmental Monitoring Locations	A3		B	D-01	D-01	A	A	B	
2084-2607	Existing Topographic Map of Application Site	A3		A	D-01		A	A		
2084-2608	Proposed Topographic Map of Application Site, Showing Final Ground Levels	A3		A			A	A		
2084-2609	Cross Sections A-A & B-B	A3		A			A	A		
2084-2610	Cross Sections C-C & D-D	A3		A			A	A		
2084-2611	Cross Section E-E	A3		A			A	A		
2084-2612	Existing & Proposed Site Infrastructure	A3		B			A	A	B	
2084-2613	Proposed Emission Points	A3		B			A	A	B	
2084-2614	Surface Water Drainage System Including Treatment / Abatement System	A3		B			A	A	B	
2084-2615	Phasing Sequence For Waste Deposition	A3		A				A		

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