

Joe Reilly

From: Wexford Receptionist
Sent: 27 February 2012 14:43
To: Joe Reilly
Subject: FW: Application by Nurendale Ltd trading as Panda Waste Services Ltd for review of Waste Licence at Rathdrinagh, Beauparc, Navan, County Meath (Reg. No. W0140-04)
Attachments: FW RE Planning Application by Nurendale Ltd for extension at Rathdrinagh Beauparc Navan (SA900875).htm

Rec'd at info@epa.ie

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From: Noel McGloin [<mailto:Noel.McGloin@fisheriesireland.ie>]
Sent: 27 February 2012 14:33
To: Wexford Receptionist
Subject: Application by Nurendale Ltd trading as Panda Waste Services Ltd for review of Waste Licence at Rathdrinagh, Beauparc, Navan, County Meath (Reg. No. W0140-04)

Dear Sir/Madam

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010 replacing the Regional Fisheries Boards (inc. the Eastern Regional Fisheries Board). Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) *the principal function of IFI is the protection, management and conservation of the inland fisheries resource.*

Under section 7(3) of the IFI Act it is stated that *without prejudice to subsection (1), IFI shall in the performance of its functions have regard to:*

(g) the requirements of the European Communities (Natural Habitats) Regulations 1997 (S.I. No. 94 of 1997) and the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems),
(h) as far as possible, ensure that its activities are carried out so as to protect the national heritage (within the meaning of the Heritage Act 1995).

Having reviewed the relevant documentation Inland Fisheries Ireland wishes to object to the above application and we want to begin by drawing your attention to our objection to the Nurendale planning application (SA900875) dated 23rd June 2009 (see attachment). We want to reiterate these objections as follows:

- This proposed development is situated on the banks of the Rathdrinagh Stream waterbody (EA_07_312) of the Eastern Regional Basin District which has an Interim Status of being *moderate*. There is an obligation under the Water Framework Directive (WFD) to *restore* this waterbody to at least good ecological status. The Rathdrinagh Stream is also a tributary of the River Boyne (a SAC) and flows into the River Boyne, near Roughgrange, a short distance away. There is no type of ecological assessment of the local waters undertaken with regard to this development. We are alarmed that in page 6 of 16 as contained in Response No. 14 (General) dated November 2011 it is stated that as it is clear that the applicant has not fully assessed the local waters:

The overflow from the wetland will discharge to the culverted land drain at the southern site boundary.
The drain flows from west to east and discharges to an unnamed third order stream, which is a tributary of the River Boyne. This stream enters the Boyne at Roughgrange, approximately four kilometers northeast of the facility.

The tributary and [sic] it is not assigned any status under the Water Framework Classification (Ref EPA data base on Water Framework Directive). The Boyne is classified as Moderate Ecological Status up and downstream of the confluence with the tributary. The water quality upstream of the tributary is classified as good.

- We understand that there will be a considerable amount of finished product (bio-fuel) and process wastewater stored on site in close proximity to the Rathdrinagh Stream e.g. Tanks 1 and 2. In the event of an accidental discharge a highly polluting liquid may enter the local ground and/or surface waters causing severe pollution to the waters as far as the River Boyne Estuary at Drogheda. There are also a number of water abstraction sites downstream of this site on the River Boyne. We are also extremely concerned as to what may happen in case of a spillage or fire.
- There appears to be some doubt as to the status of the technology with regard to health and safety. We want the EPA to satisfy themselves as to the technology involved.
- The Rathdrinagh stream has a record of salmonids present in its lower reaches. These include Atlantic Salmon and Brown Trout. Atlantic Salmon (*Salmo salar*) are an Annex II species under the Habitats Directive and the River Boyne is a candidate Special Area of Conservation (SAC). A full Appropriate Assessment should be undertaken as per the Habitats Directive.
- We note that the *Panda Waste Constructed Wetland Design* document designed by Bartley OSuilleabhain (as submitted to the EPA post November 2011) dates from 14 June 2006 and is now almost six years old. The technology and understandings regarding this technology has advanced since then. Also several other documents have been published. In the light of this the submitted document should be withdrawn or at least updated before being considered as a plan for this site.

Please bear in mind our submission. We may make further submissions in due course.

Yours faithfully

Noel McGloin

Noel McGloin
Senior Fisheries Environmental Officer - Eastern River Basin District

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Help Protect Ireland's Inland Fisheries

W040-04

From: Noel McGloin [noel.mcglain@erfb.ie]
Sent: 23 June 2009 15:53
To: 'planning@meathcoco.ie'
Subject: FW: RE: Planning Application by Nurendale Ltd for extension at Rathdrinagh, Beauparc, Navan (SA/900875)

Dear Sir/Madam

The Board wishes to object to the above on the following grounds:

- This proposed development is situated on the banks of the Rathdrinagh Stream waterbody (EA_07_312) of the Eastern Regional Basin District which has an Interim Status of being *moderate*. There there is an obligation under the Water Framework Directive (WFD) to *restore* this waterbody to at least good ecological status. The Rathdrinagh Stream is also a tributary of the River Boyne (a SAC) and flows into the River Boyne, near Roughgrange, a short distance away. There is no type of ecological assessment of the local waters undertaken with regard to this development.
- We understand that there will be a considerable amount of finished product (bio-fuel) and process wastewater stored on site in close proximity to the Rathdrinagh Stream. In the event of an accidental discharge a highly polluting liquid may enter the local ground and/or surface waters causing severe pollution to the waters as far as the River Boyne Estuary at Drogheda. There are also a number of water abstraction sites downstream of this site on the River Boyne. There appears to be minimal information with regard to the processes involved, amounts of matter arising from these processes and no detailed information with regard to the use on site of any matter. Also there is no reference to any accident plan in case of a spillage.

In summary we would ask Meath County Council to refuse this application as it stands unless our concerns can be dealt with through the request of Further Information. We submit that any decision on this application will have to take into account the restoration to good ecological status of the Rathdrinagh Stream.

We understand that more information may be submitted as part of the new Waste Management Licence application, but we prefer that this information should also be dealt with at planning stage.

Please forward use a copy of any up to date relevant technical data for our information as well as a copy of your decision in due course.

Regards

Noel McGloin

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