

Noeleen Keavey

Subject: FW: W0265-01 Clashford Recovery Facility
Attachments: W0265_01_JSPE_173_L29.pdf

From: John Sheils [<mailto:jsheils@jspe.ie>]
Sent: 01 February 2018 15:28
To: Licensing Staff <licensing@epa.ie>
Cc: Clashford Recovery <info@clashford.com>; Michael Gill <michael@hydroenvironmental.ie>
Subject: W0265-01 Clashford Recovery Facility

To whom it concerns,

On behalf of Clashford Recovery Facility Ltd, we have prepared the attached response to your notice issued on 8th December 2017 in accordance with Article 16(1) of the Waste Management (Licensing) Regulations.

We look forward to hearing from you with respect to this matter.

Yours sincerely,

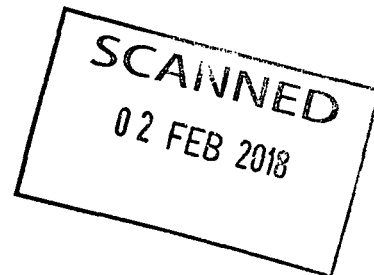
John Sheils MSCSI/MRICS

J Sheils Planning & Environmental Ltd

31 Athlumney Castle
Navan
Co. Meath
Ireland

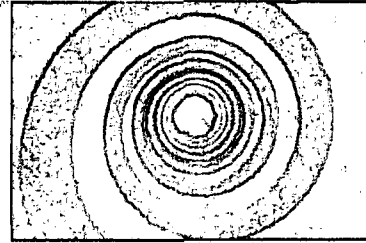
Tel: +353 (0)46 9073997[®]
Mob: +353 (0)87 2730087[®]
email: johnsheils@jspe.ie
Web: jspe.ie

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Ms. Noeleen Keavey,
Program Officer,
c/o Administration,
Office of Environmental Sustainability,
Environmental Protection Agency,
Headquarters, PO Box 3000,
Johnstown Castle Estate,
Co. Wexford,
Y35 W821



JSPE

J Sheils Planning & Environmental Ltd

31 Athlumney Castle, Navan, Co Meath

Phone/Fax: Ireland +353 46 9073997

Mobile: John Sheils +353 87 2730087

Email: johnsheils@jspe.ie

Date: 1st February 2018

Our Ref: JSPE 173_L29

Your Ref: W0265-01

Re: Notice in accordance with Article 16(1) of the Waste Management (Licensing) Regulations 2004

Waste Licence Application by CLASHFORD RECOVERY FACILITY LTD for the continued operation of its existing Waste Recovery Facility on lands at Naul Townland, Naul, Co. Meath (National Grid Reference 285633E 253005N).

Dear Ms Keavey,

On behalf of Clashford Recovery Facility Ltd, we have prepared the following response to your notice issued on 8th December 2017 in accordance with Article 16(1) of the Waste Management (Licensing) Regulations.

The notice relates to a request for further information to update the EIS in accordance with the requirements of the 2014 EIA Directive.

Following on from our recent telephone conversation of 26/01/18, we require an extension of time to respond to your request due to several mitigating factors. i.e.

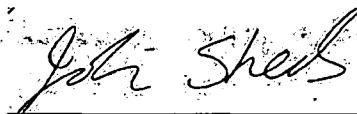
- The EPA issued a notice in accordance with Article 16(1) of the Waste Management (Licensing) Regulations 2004 dated 18/12/17. In accordance with this notice further information is required which reflects the current status of the facility to allow for an assessment of this application in accordance with sub-articles 12(1)(a) to (v) of the Waste Management (Licensing) Regulations 2004, as amended.
 - This request for further information is significant and much of the information required will be needed to inform the revised EIAR which is subject of your request for further information of 8/12/17.

- We are currently engaging with the inspectorate of the Environmental Licensing Programme Office of Environmental Sustainability with respect to addressing your request for further information of 18/12/17.
 - Item 10 of the request for Further Information dated 18/12/17 requires submission of an Environmental Liabilities Risk Assessment (ELRA); and a Closure, Restoration and Aftercare Management Plan (CRAMP). The ELRA and CRAMP is to take into consideration the nature and extent of waste deposited previously at the facility and the consequent risk of environmental pollution arising in future as a result of the presence of construction and demolition waste (other than soil and stone) in the fill at the unlined facility.
 - The appointed hydrogeologist has prepared a detailed ground investigation programme including soil testing as part of the environmental risk assessment.
 - Additional ground and surface water monitoring is also being carried out as part of the risk assessment to address items 10, 11 and 12 of the request for further information.
 - It is considered it will take up to **3 months** including tendering of contracts, mobilisation, conduction of ground investigations, monitoring, laboratory analysis, completion of groundwater and surface water risk assessment and updating of relevant sections of the EIAR.
- The request for further information corresponded with the Christmas holiday period and as such it is considered that the proposed extension of time allows for this period.

As such we request an extension of time of c. 3 months up to **7th May 2018** with respect to submission of the updated EIAR. We would be grateful if you could respond in writing to our request at your earliest opportunity given your current time frame for submission of 8 weeks from 8/12/17 (excluding Christmas period).

Yours Sincerely,

For J Sheils Planning & Environmental Ltd,



John Sheils MSCSI MRICS