



**CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE &
PLANNING**

CARTRON BIG HISTORIC LANDFILL - H0302-01

RESPONSE TO REQUEST FOR INFORMATION

Prepared for: Longford County Council



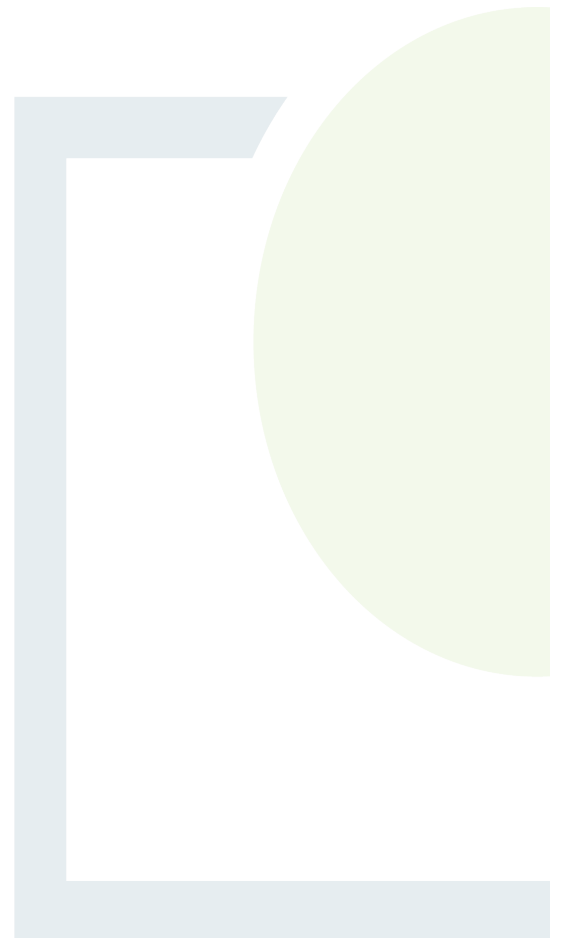
Date: November 2022

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RESPONSE TO REQUEST FOR INFORMATION

REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT User is responsible for Checking the Revision Status of This Document

Rev. No.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
0	Draft	BF/AMW	JON	BG	25.10.2022
1	Final	BF/AMW	JON	BG	28.11.2022

Client: Longford County Council

Keywords: Regulation 7, historical landfill, environmental risk assessment.

Abstract: Fehily Timoney and Company (FT) on behalf of Longford County Council (LCC) submitted an application to the Environmental Protection Agency (EPA) for a certificate of authorisation (CoA) for the Cartron Big Historic Landfill. The EPA determined the application did not comply with Regulation 7(2) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations, 2008. The EPA requested that Longford County Council (LCC), in accordance with Regulation 7(4) supply the information listed in Appendix 1. This report provides responses to the queries raised.

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1. INTRODUCTION

1.1 Introduction

Fehily Timoney and Company (FT) on behalf of Longford County Council (LCC) submitted an application to the Environmental Protection Agency (EPA) for a Certificate of Authorisation (CoA) for Cartron Big Historic Landfill.

The EPA reviewed the CoA application and determined the application did not comply with Regulation 7(2) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations, 2008. The EPA requested that LCC, in accordance with Regulation 7(4) supply the information listed in Appendix 1.

This report provides responses to the queries raised.



2. REQUEST FOR INFORMATION

This section outlines the 9 no. items (including an updated Non-Technical Summary) requested by the EPA and the responses to respective items.

2.1 Item 1

2.1.1 Request for Information

Provide a letter from the Professional Body to the Qualified Person, as required under Section 2.3 of the EPA Code of Practice – Environmental Risk Assessment for Unregulated Waste Disposal Sites, using template/sample letter for Qualified Person available at <https://www.epa.ie/our-services/licensing/waste/historic-landfills/>.

2.1.2 Response

A letter from the Qualified Body (Engineers Ireland) to the Qualified Person (James O'Neill) confirming the Qualified Person has been assessed as a person who is qualified, trained and experienced to the standard set out in Section 2.3 of Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (EPA, 2007) is included in Appendix 2.

2.2 Item 2

2.2.1 Request for Information

Section 3.1.2 of the Tier 3 Assessment states that eight gas vents are installed across the site. Include these gas vents on the Drawing required under Point 9.

2.2.2 Response

The locations of 7 vents are known. The locations of the known vents and have been added to Drawing required under Point 9.

See Appendix 3.

2.3 Item 3

2.3.1 Request for Information

It is noted that the font in the cross-sections of the landfill profiles shown in Drawings No. P18159-GP-D02 to P18159-GP-D06 of the Ground Investigation Report is illegible. Re-submit the drawings with a clear readable font.



2.3.2 Response

Please see Appendix 4 for updated drawings:

- P22-158-0601-0002
- P22-158-0601-0003
- P22-158-0601-0004
- P22-158-0601-0005
- P22-158-0601-0006

2.4 Item 4

2.4.1 Request for Information

State whether the on-site man-made drainage channels referred to in Section 1.1 of the Tier 3 Assessment will cease to exist following the remediation works. Include these drainage channels and their discharge points on the Drawing required under Point 9 if intended to be retained after remediation.

2.4.2 Response

Man-made drainage channels referred to in Section 1.1 of the Tier 3 Assessment will be replaced with the French drain with dimensions 600x1000cm, with a 160 Slotted HDPE SDR 17 pipe, as per Detail C-C' (Drawing No. P1444-0900-0003), which will collect and direct the surface water flow.

2.5 Item 5

2.5.1 Request for Information

Figure 4.1 'Groundwater flow' of the Tier 2 Assessment indicates that groundwater flows towards the north and north-west. Section 5.4 of the same document states that the groundwater flow direction 'is confirmed to be due north-north-east'. Clarify the direction of groundwater flow. Include a figure showing the correct direction of groundwater flow.

2.5.2 Response

As per Figure 4.1 'Groundwater flow' of the Tier 2 Assessment groundwater flows north-north-west.

Section 5.4 of the Tier 2 Assessment has been corrected. An updated Tier 2 Assessment accompanies this report.

Groundwater flow direction is shown in Figure 4.1 of the Tier 2 report.



2.6 Item 6

2.6.1 Request for Information

Confirm what the solid red circle refers to on the Drawing No. P1444-0500-0002 'Leachate interception trench: plan' of the Tier 3 Assessment.

2.6.2 Response to Item 6(i)

The solid red circle refers to the proposed leachate collection sump as described in Section 3.1.1 of the Tier 3 Assessment.

An updated drawing has been prepared and included in Appendix 5.

The referenced drawing has also been updated within the revised Tier 3 Assessment that accompanies this report.

2.7 Item 7

2.7.1 Request for Information

Clarify whether the collected leachate will be taken off site to an authorised recovery/disposal facility or discharged from the site. If to be discharged from the site, state whether there is authorisation in place for the proposed discharge and submit a copy of any such authorisation.

2.7.2 Response

The collected leachate will be removed from site to an authorised Wastewater Treatment Plant.

It is not proposed to discharge leachate from the site.

2.8 Item 8

2.8.1 Request for Information

Section B.1. of the Application Form states that Longford County Council is the owner of the site. Section 3.2.1 of the Tier 3 Assessment states that the capping works shall be subject to agreement with private landowner(s). Clarify whether the site is owned by Longford County Council or private landowner(s).

2.8.2 Response

Longford County Council is full owner of the site since 29 March 1951. (Land Registry for Folio 8128)

The site is under lease to a private occupier.



Section 3.2.1 of the Tier 3 Assessment has been updated. The updated Tier 3 Assessment accompanies this report.

2.9 Item 9

2.9.1 Request for Information

Provide one Drawing showing all of the following elements interpolated:

- (i) the entire site boundary in red;*
- (ii) the outline of the waste body boundary, in a different colour than red;*
- (iii) the area to be capped, in a different colour than required in Points (i) and (ii);*
- (iv) monitoring locations for leachate, groundwater, landfill gas and surface water;*
- (v) the existing gas vents referred to in Point 2; and*
- (vi) the drainage channels referred to in Point 4.*

2.9.2 Response

An updated drawing has been prepared as requested.

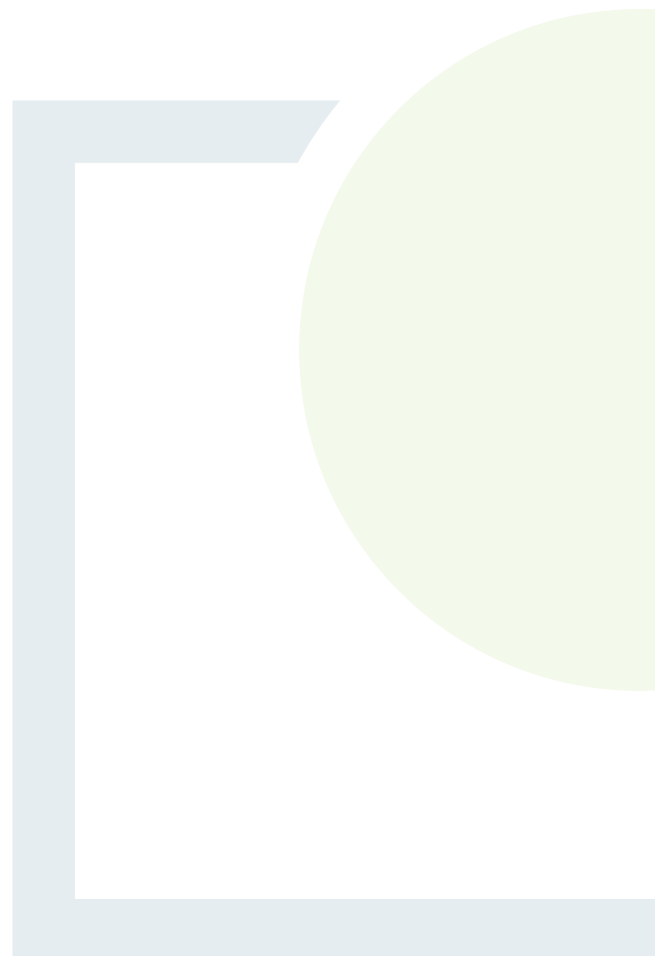
Please see Appendix 3.



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APPENDIX 1

Regulation 7 Notice





Mr. Bernard Shea,
Environmental Services,
Longford County Council,
Great Water Street,
Co. Longford.

N39 NH56

Headquarters, PO Box 3000
Johnstown Castle Estate
Co Wexford,
Y35 W821, Ireland

Ceannchethrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman,
Y35 W821, Éire

T: +353 53 916 0600
F: +353 53 916 0699
E: info@epa.ie
W www.epa.ie
LoCall: 0818 33 55 99

20th June 2022

Reg. No. H0302-01

Re: Cartron Big Historic Landfill – Notice in accordance with Regulation 7(4) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations, 2008

Dear Mr. Shea,

I am to refer to the above referenced application for a certificate of authorisation in relation to the above referenced historic landfill.

Having examined the foregoing, I am to advise that the Agency is of the view that the application does not comply with Regulation 7(2) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations, 2008.

You are therefore requested in accordance with Regulation 7(4) of the Regulations, to take steps to supply the information detailed below:

REGULATION 7(2) COMPLIANCE REQUIREMENTS

1. Provide a letter from the Professional Body to the Qualified Person, as required under Section 2.3 of the EPA Code of Practice – Environmental Risk Assessment for Unregulated Waste Disposal Sites, using template/sample letter for Qualified Person available at <https://www.epa.ie/our-services/licensing/waste/historic-landfills/>.
2. Section 3.1.2 of the Tier 3 Assessment states that eight gas vents are installed across the site. Include these gas vents on the Drawing required under Point 9.
3. It is noted that the font in the cross-sections of the landfill profiles shown in Drawings No. P18159-GP-D02 to P18159-GP-D06 of the Ground Investigation Report is illegible. Re-submit the drawings with a clear readable font.

4. State whether the on-site man-made drainage channels referred to in Section 1.1 of the Tier 3 Assessment will cease to exist following the remediation works. Include these drainage channels and their discharge points on the Drawing required under Point 9 if intended to be retained after remediation.
5. Figure 4.1 ‘Groundwater flow’ of the Tier 2 Assessment indicates that groundwater flows towards the north and north-west. Section 5.4 of the same document states that the groundwater flow direction ‘is confirmed to be due north-north-east’. Clarify the direction of groundwater flow. Include a figure showing the correct direction of groundwater flow.
6. Confirm what the solid red circle refers to on the Drawing No. P1444-0500-0002 ‘*Leachate interception trench: plan*’ of the Tier 3 Assessment.
7. Clarify whether the collected leachate will be taken off site to an authorised recovery/disposal facility or discharged from the site. If to be discharged from the site, state whether there is authorisation in place for the proposed discharge and submit a copy of any such authorisation.
8. Section B.1. of the Application Form states that Longford County Council is the owner of the site. Section 3.2.1 of the Tier 3 Assessment states that the capping works shall be subject to agreement with private landowner(s). Clarify whether the site is owned by Longford County Council or private landowner(s).
9. Provide one Drawing showing all of the following elements interpolated:
 - (i) the entire site boundary in red;
 - (ii) the outline of the waste body boundary, in a different colour than red;
 - (iii) the area to be capped, in a different colour than required in Points (i) and (ii);
 - (iv) monitoring locations for leachate, groundwater, landfill gas and surface water;
 - (v) the existing gas vents referred to in Point 2; and
 - (vi) the drainage channels referred to in Point 4.

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.

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. It is not sufficient to annotate the original drawing with a textual correction. The revision status, such as revised drawing number and/or revision date should be clearly stated. Also, where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Please supply the requested information within *four weeks* of the date of this notice. Please note that during COVID-19 there are new arrangements in place for the receipt of all correspondence in relation to applications for Certificates of Authorisation. Accordingly, any correspondence in respect of the above referenced application should be sent to the Agency via file transfer by emailing historiclandfillapplications@epa.ie, quoting the Register Number H0302-01. The EPA doesn't accept files to be transferred using any file share application other than MS One Drive. Each file should be in a searchable .pdf format and a size not exceeding 10MB.

Please also note, post COVID-19, you may be contacted to submit the hard copies and CD-ROMs for the submitted electronic correspondence.

Yours sincerely,



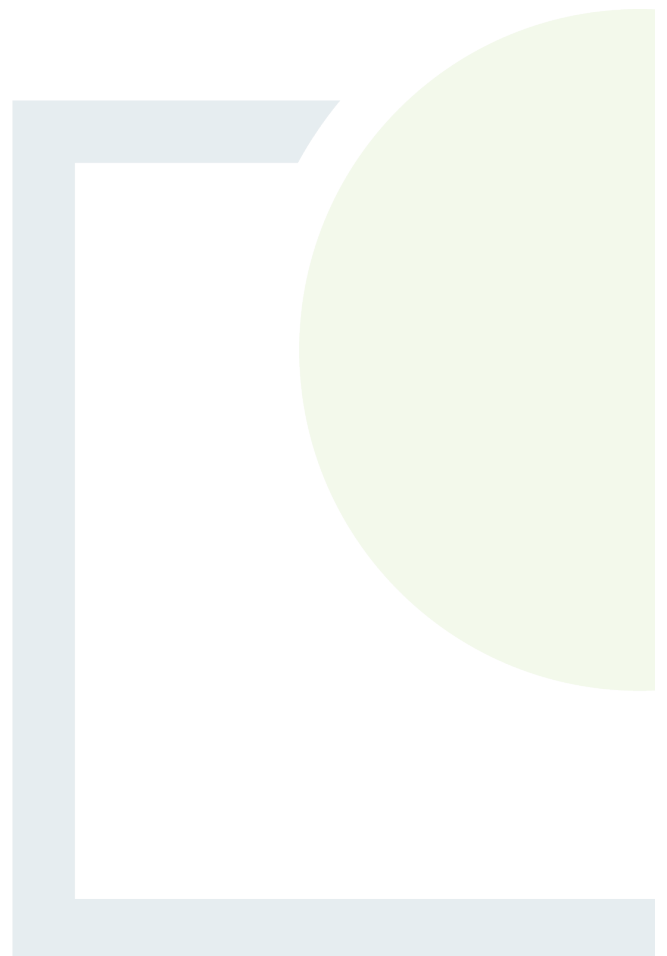
Ewa Babiarczyk
Inspector
Circular Economy Regulation Team
Circular Economy Programme



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APPENDIX 2

A Letter from the Qualified
Body to the Qualified Person



Sent via email only to: james.oneill@ftco.ie

9 November 2022

Re: Register of Chartered Engineers for Historic Landfill Register accordance with Section 2.3 of Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (EPA, 2007)

To Whom it May Concern,

This letter confirms that Mr James O'Neill is a member of Engineers Ireland in good standing.

Engineers Ireland confirms that Mr O'Neill has been assessed as a person who is qualified, trained and experienced to the standard set out in Section 2.3 of Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (EPA, 2007).



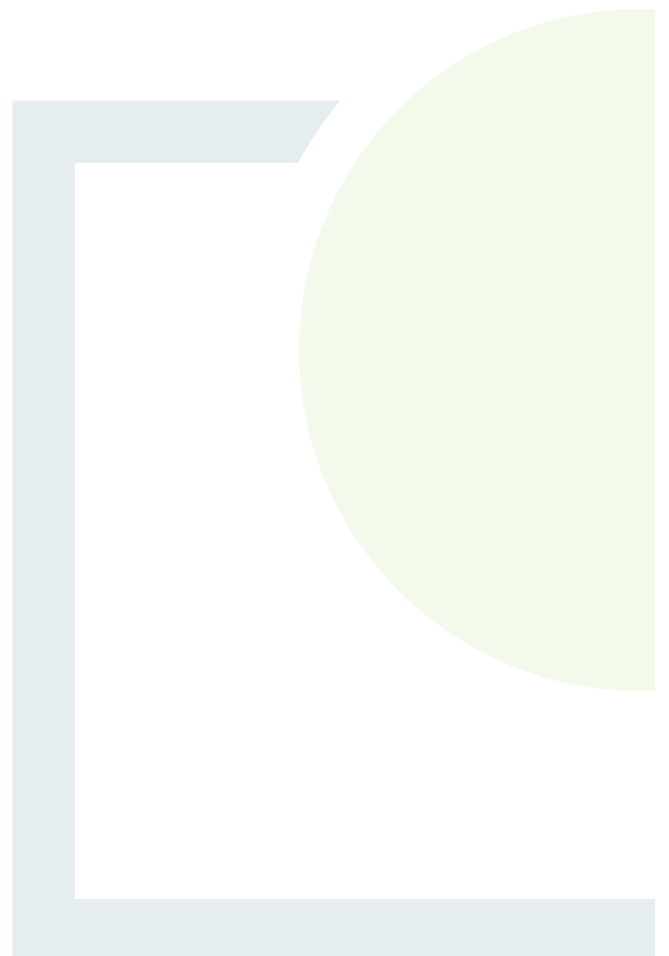
Damien Owens
Director General

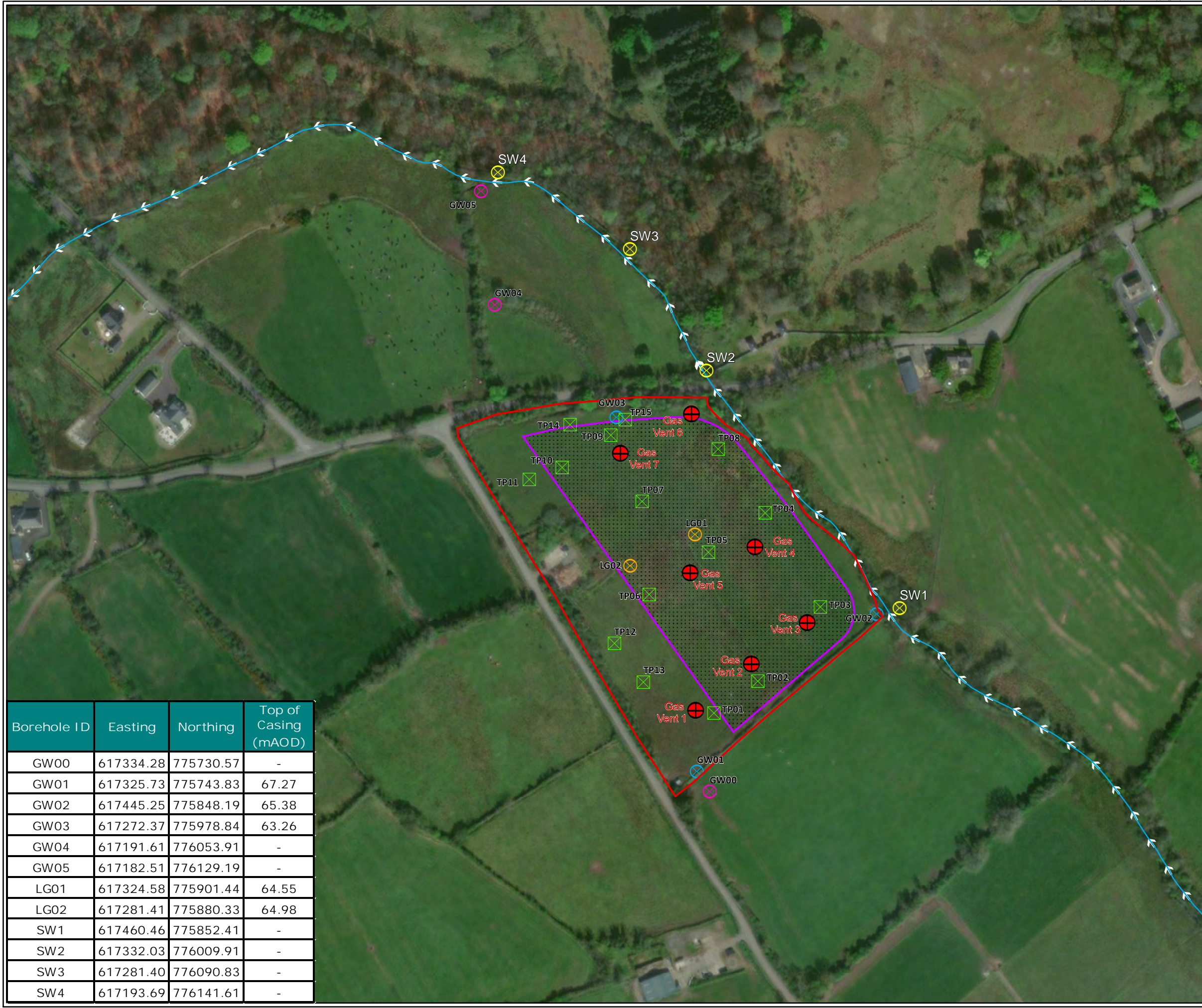


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APPENDIX 3

Drawing requested under
Point 9

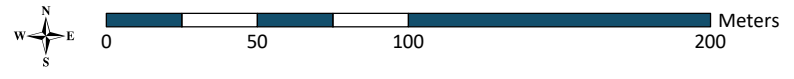




- Site Boundary
 - Carton Big: Anticipated Waste Boundary
 - Proposed Area to be Capped
 - Rivers
 - ⊗ Surface Water Monitoring Locations
 - ⊗ Gas Vents
- SI Locations**
- Type**
- ⊗ Existing Groundwater Monitoring Well (Installed Sept, 2018)
 - ⊗ Existing Groundwater Monitoring Well (Installed 2020)
 - ⊗ Leachate Monitoring Well
 - ⊗ Trial Pit

Borehole ID	Easting	Northing	Top of Casing (mAOD)
GW00	617334.28	775730.57	-
GW01	617325.73	775743.83	67.27
GW02	617445.25	775848.19	65.38
GW03	617272.37	775978.84	63.26
GW04	617191.61	776053.91	-
GW05	617182.51	776129.19	-
LG01	617324.58	775901.44	64.55
LG02	617281.41	775880.33	64.98
SW1	617460.46	775852.41	-
SW2	617332.03	776009.91	-
SW3	617281.40	776090.83	-
SW4	617193.69	776141.61	-

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PROJECT:	Catron Big Historic Landfill: Regulation 7 RFI		
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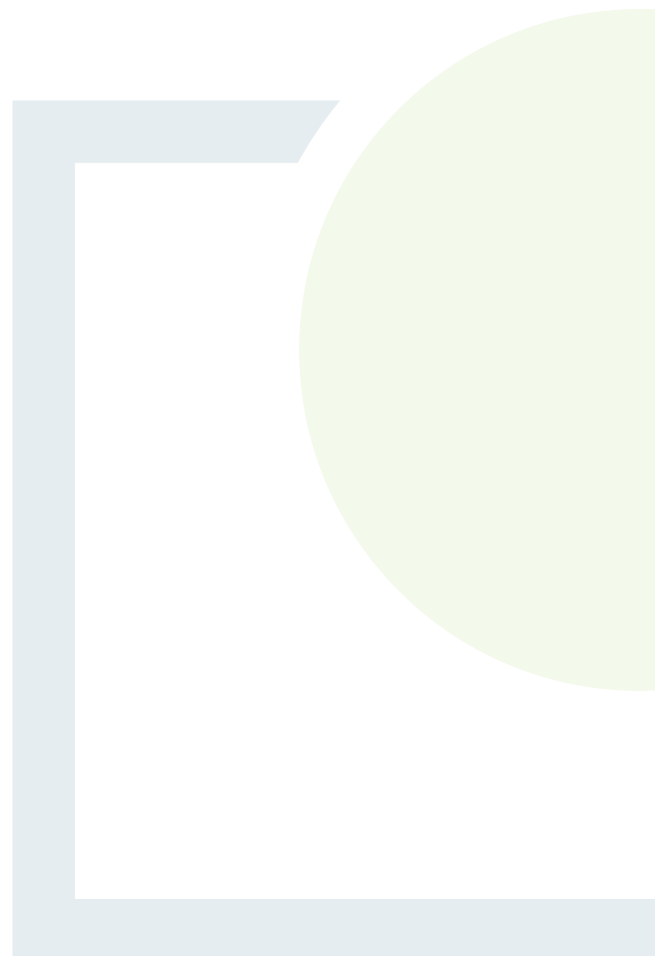




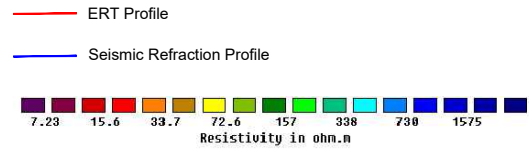
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APPENDIX 4

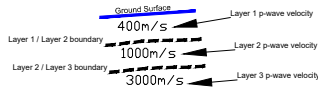
Updated Drawings requested
under Point 3



Legend:



Seismic refraction boundaries with P-wave velocities (m/s):

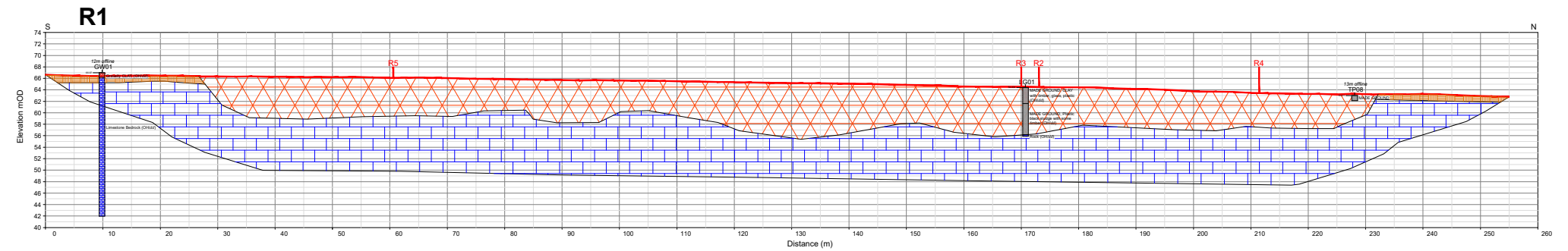
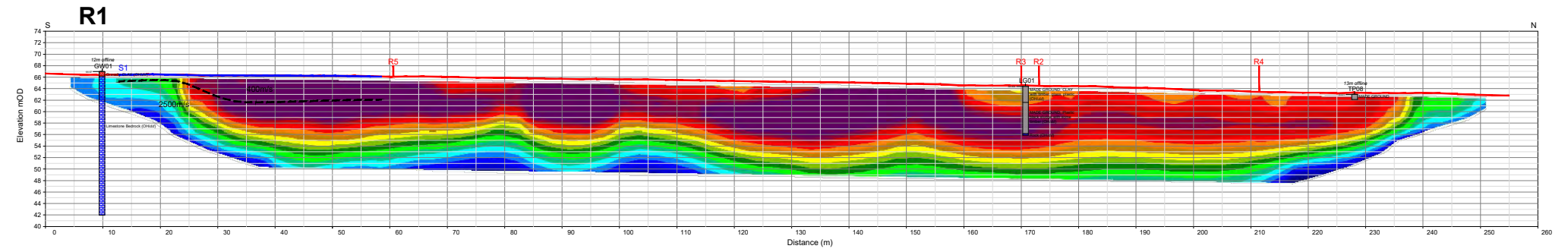
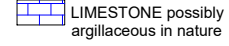


Geophysical Interpretation

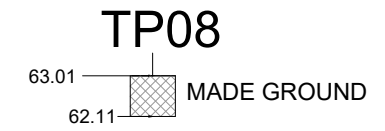
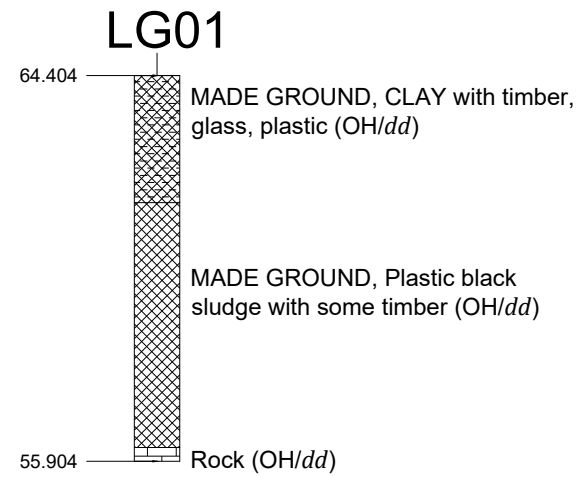
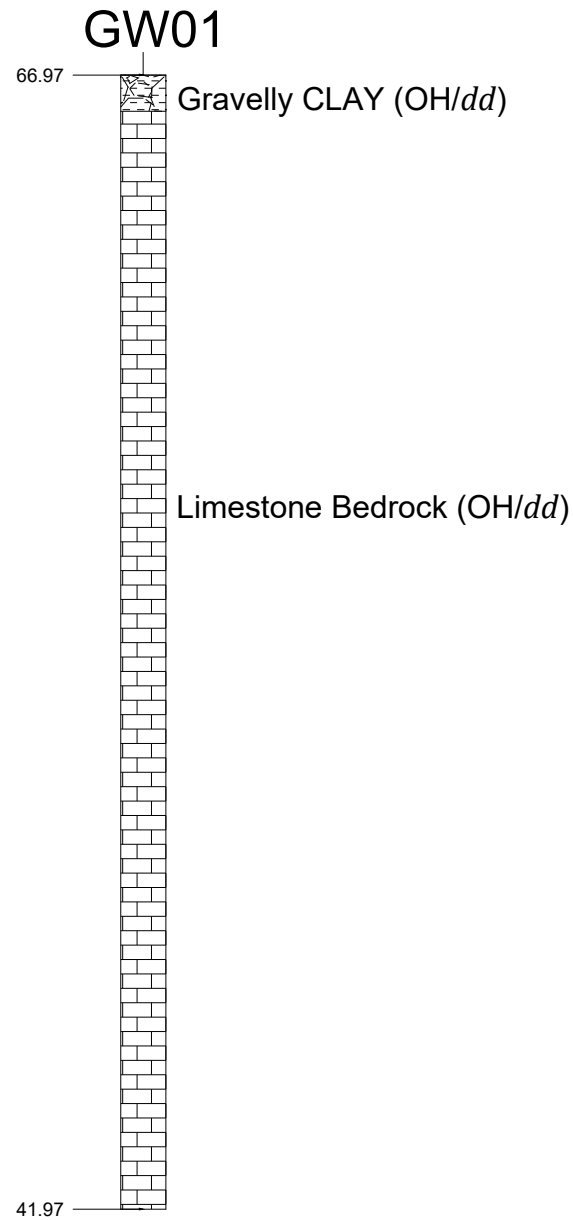
Overburden



Bedrock



GEOPHYSICAL PROFILE - R1
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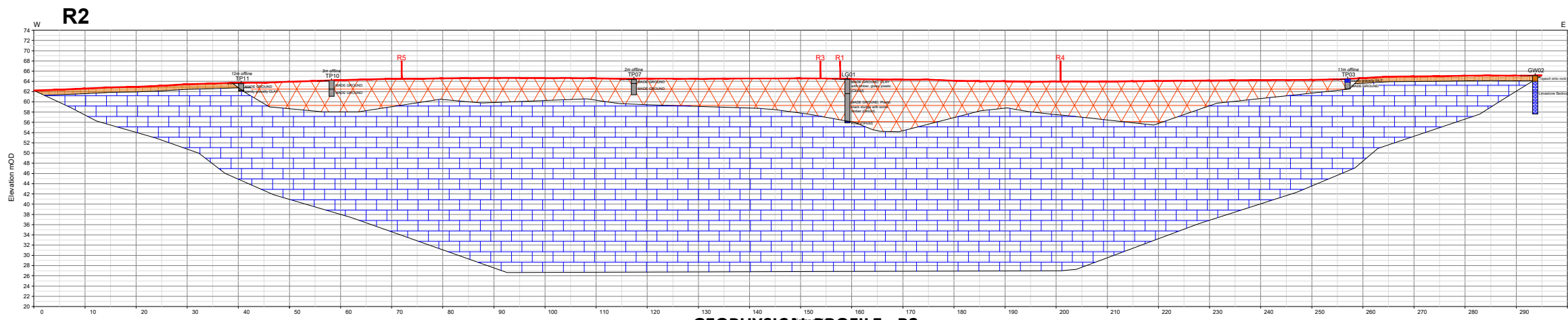
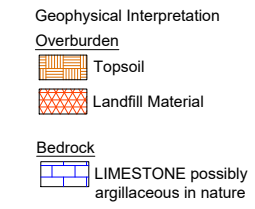
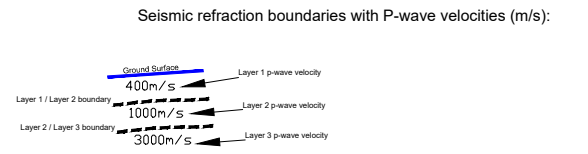
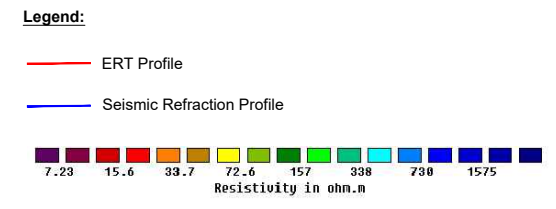
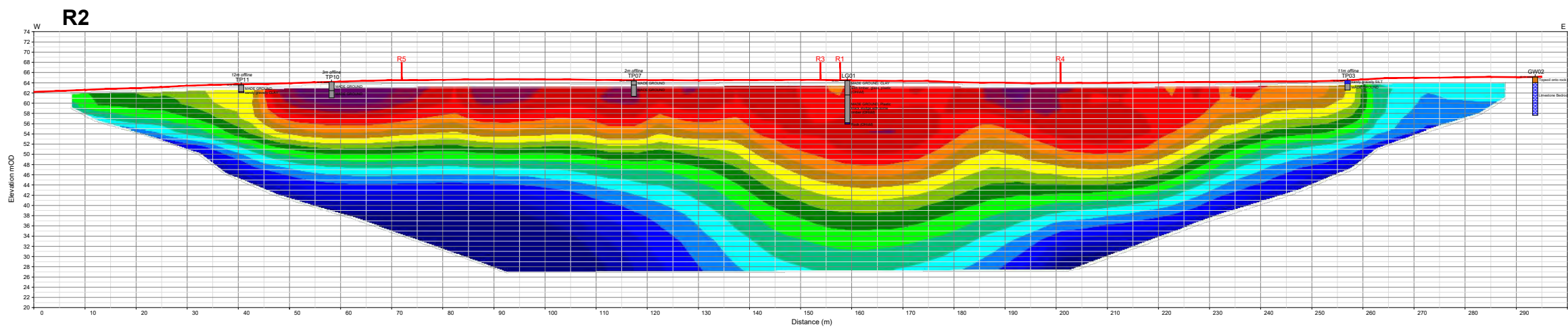
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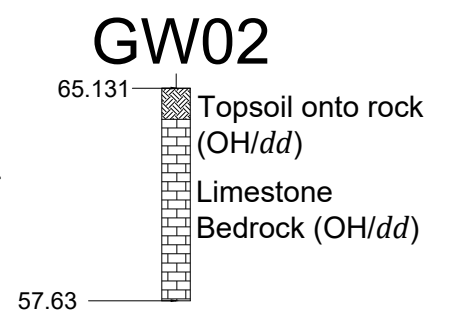
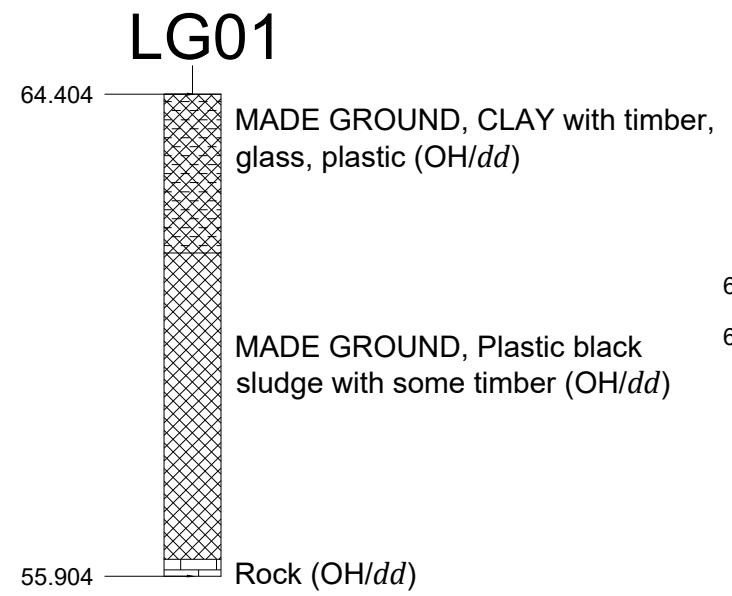
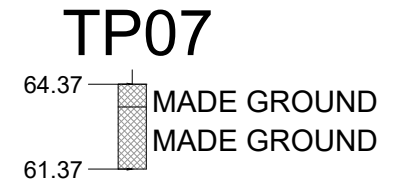
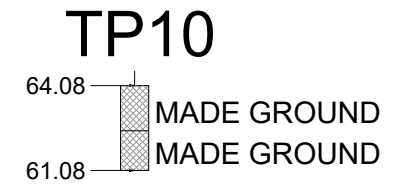
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CARTRON BIG LANDFILL, LONGFORD	CARTRON BIG		
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	BF		

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04 October 2022



GEOPHYSICAL PROFILE - R2
1:500



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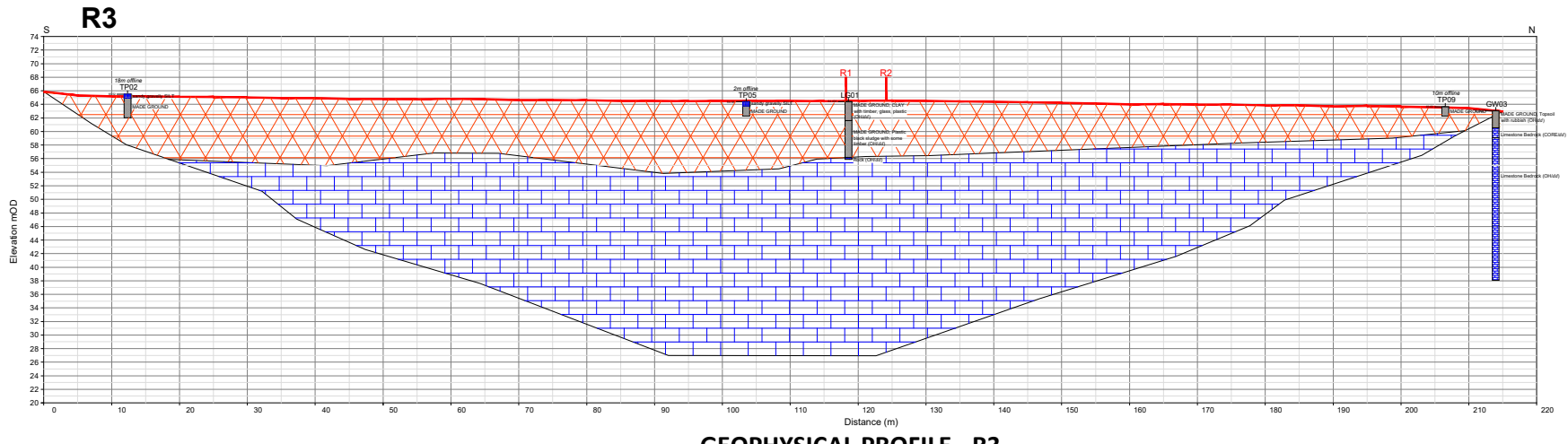
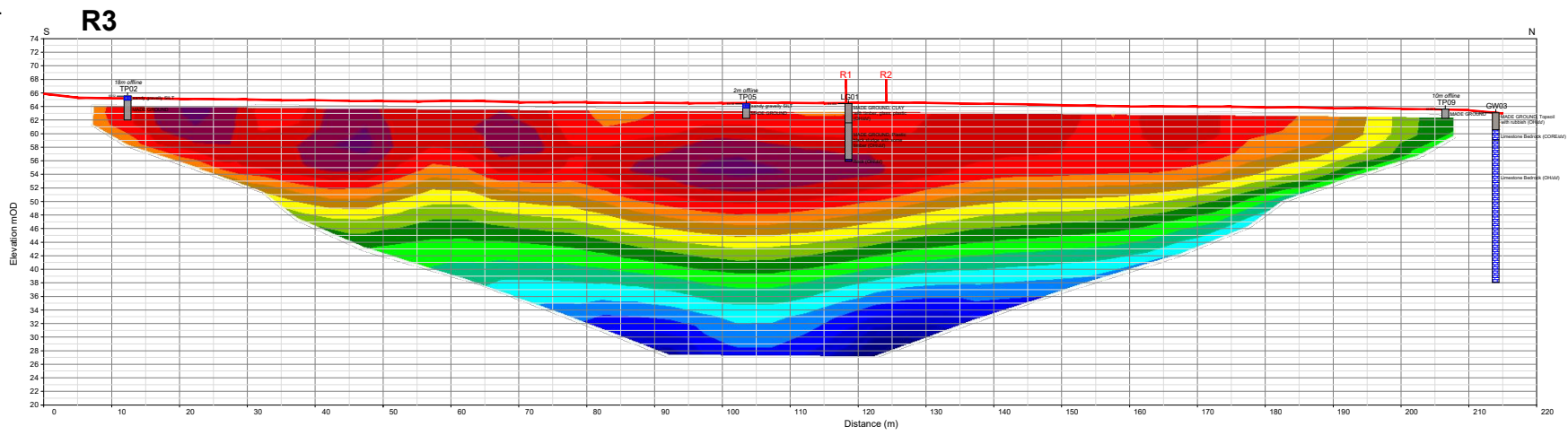
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PROJECT	CLIENT		
CARTRON BIG LANDFILL, LONGFORD	CARTRON BIG		
SHEET	Date	Project number	Scale (@ A3-)
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Checked by	BF		

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04 October 2022



GEOPHYSICAL PROFILE - R3
1:500

Legend:

- ERT Profile
- Seismic Refraction Profile

Resistivity in ohm.m

7.23 15.6 33.7 72.6 157 338 738 1575

Seismic refraction boundaries with P-wave velocities (m/s):

- Ground Surface
- Layer 1 p-wave velocity: 400m/s
- Layer 2 p-wave velocity: 1000m/s
- Layer 3 p-wave velocity: 3000m/s

Geophysical Interpretation

Overburden

- Topsoil
- Landfill Material

Bedrock

- LIMESTONE possibly argillaceous in nature

TP02

65.52

sandy gravelly SILT

MADE GROUND

62.02

TP05

64.38

sandy gravelly SILT

MADE GROUND

62.28

LG01

64.404

MADE GROUND, CLAY with timber, glass, plastic (OH/dd)

MADE GROUND, Plastic black sludge with some timber (OH/dd)

55.904

Rock (OH/dd)

TP09

63.63

MADE GROUND

62.28

GW03

63.058

MADE GROUND, Topsoil with rubbish (OH/dd)

Limestone Bedrock (CORE/dd)

Limestone Bedrock (OH/dd)

38.06

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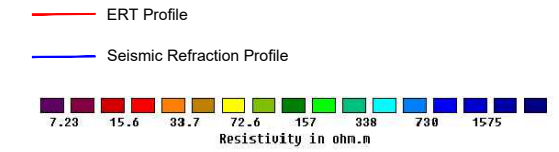
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A	ISSUE FOR INFORMATION	JH	23.09.22

PROJECT	CARTRON BIG LANDFILL, LONGFORD			CLIENT	CARTRON BIG		
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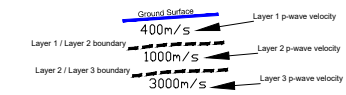
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04 October 2022

Legend:



Seismic refraction boundaries with P-wave velocities (m/s):



Geophysical Interpretation

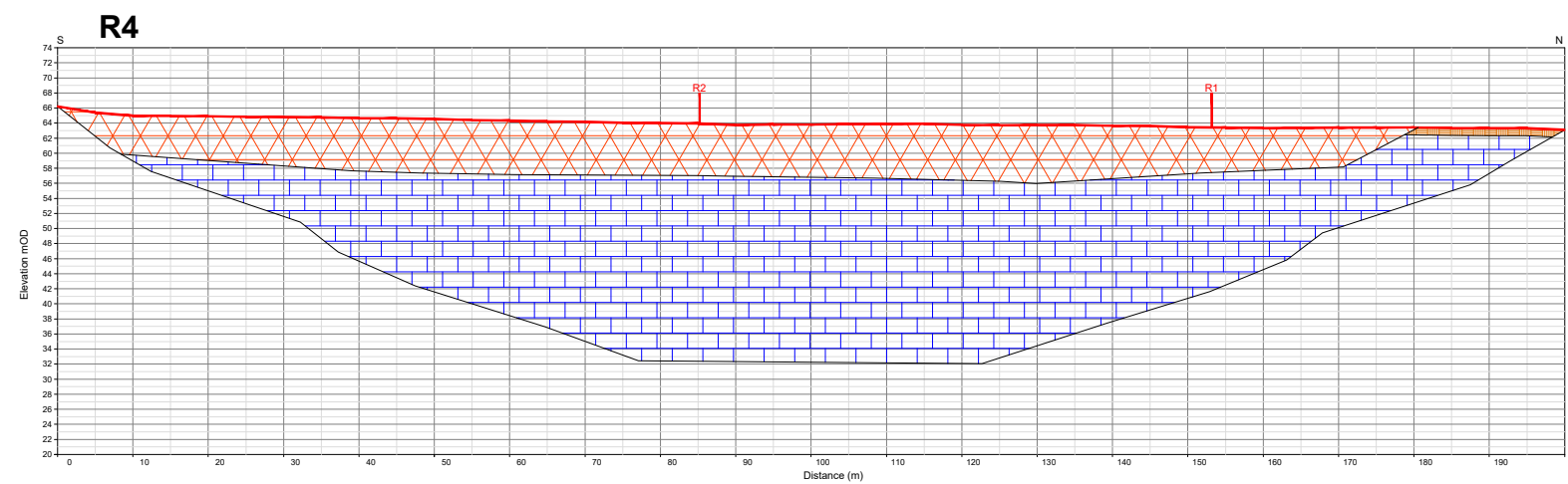
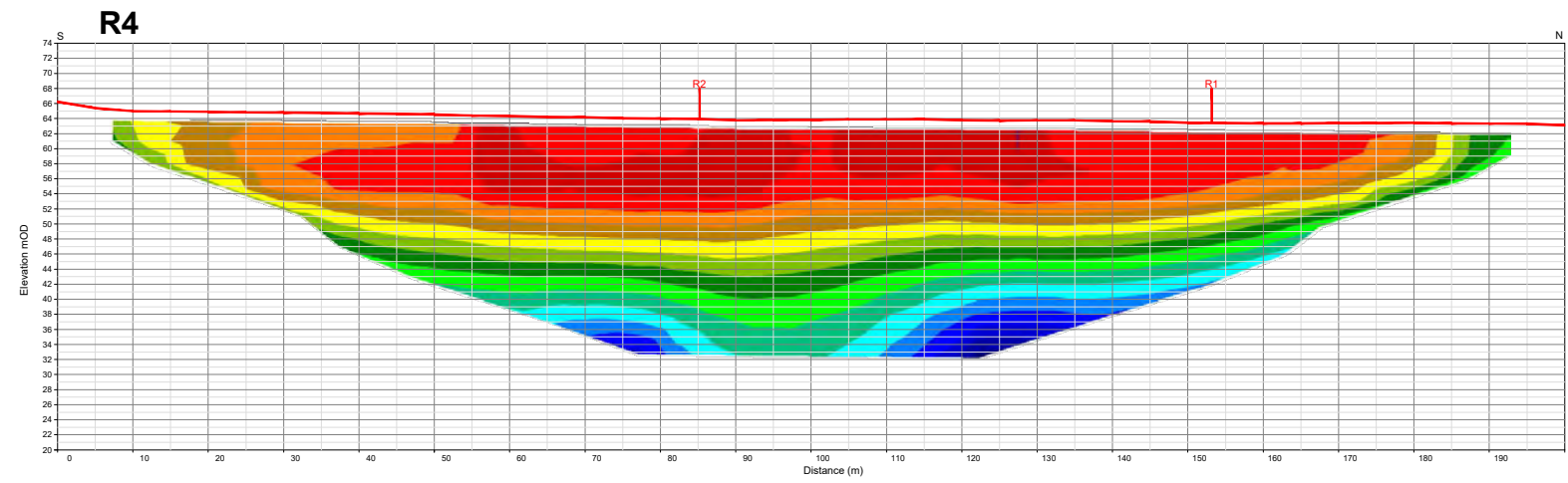
Overburden

Topsoil

Landfill Material

Bedrock

LIMESTONE possibly argillaceous in nature



GEOPHYSICAL PROFILE - R4

1:500

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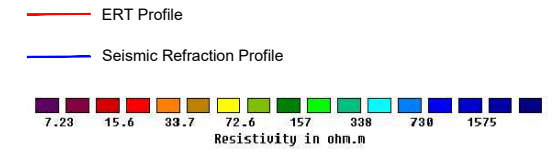
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Rev.	Description	App By	Date
A	ISSUE FOR INFORMATION	JH	23.09.22

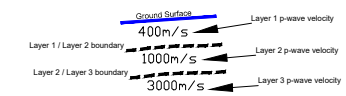
PROJECT	CLIENT		
CARTRON BIG LANDFILL, LONGFORD	CARTRON BIG		
SHEET	Date	Project number	Scale (@ A3-)
	16.09.22	P22-158	1:1000
	Drawn by	Drawing Number	Rev
SFM	P22-158-0601-0005	A	
Checked by	BF		

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Legend:



Seismic refraction boundaries with P-wave velocities (m/s):

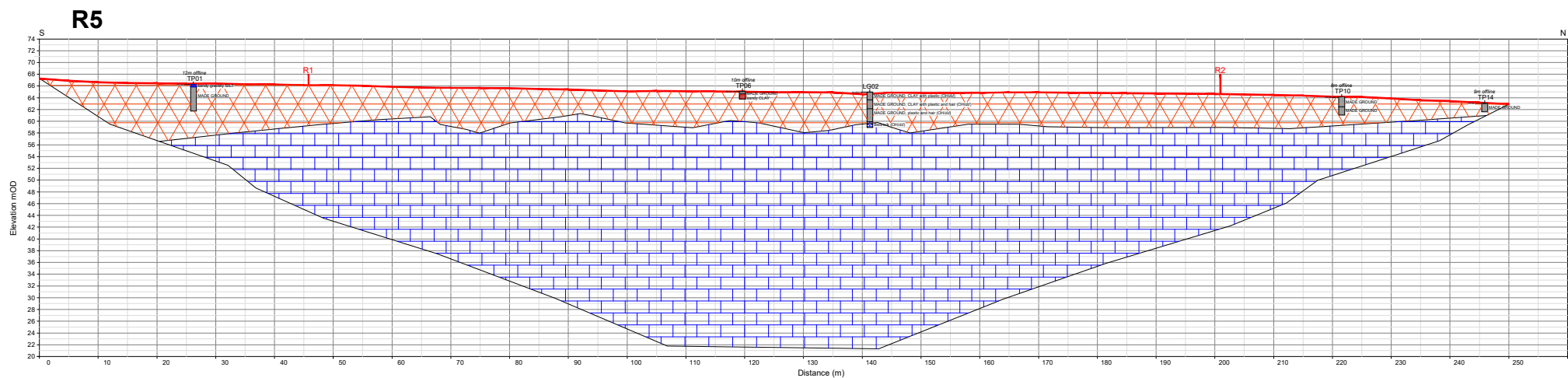
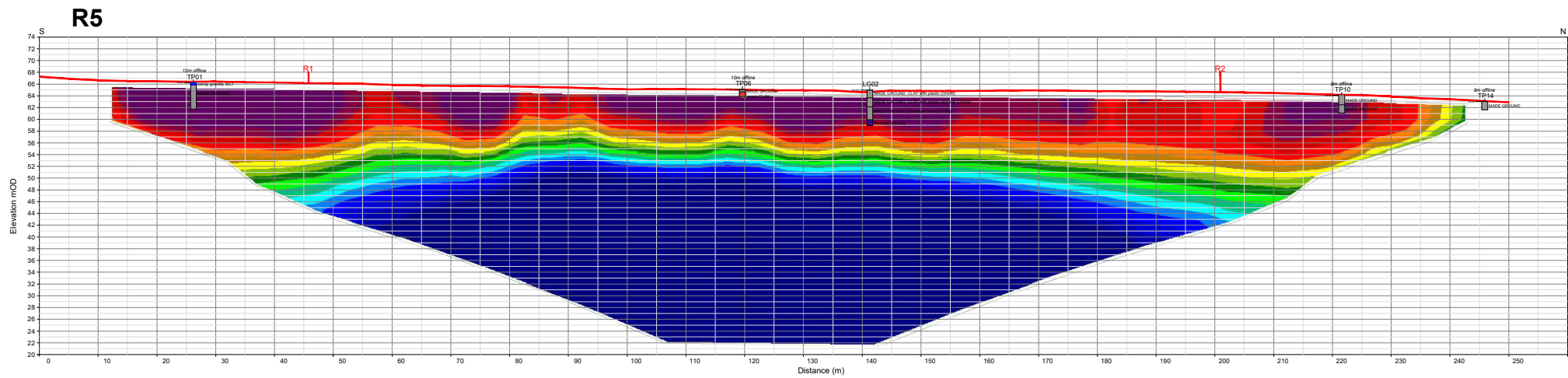
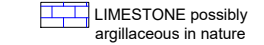


Geophysical Interpretation

Overburden



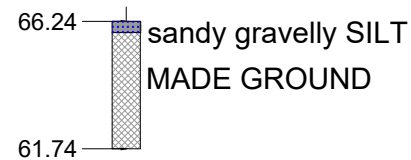
Bedrock



GEOPHYSICAL PROFILE - R5

1:500

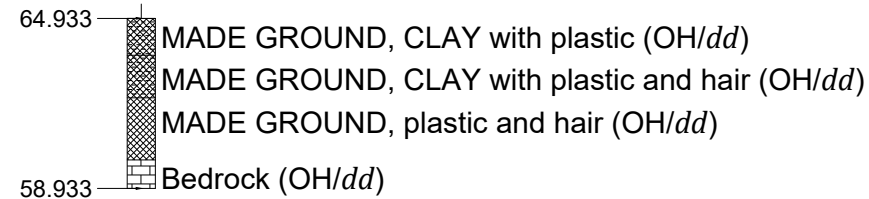
TP01



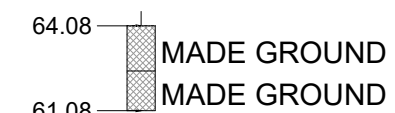
TP06



LG02



TP10



TP14



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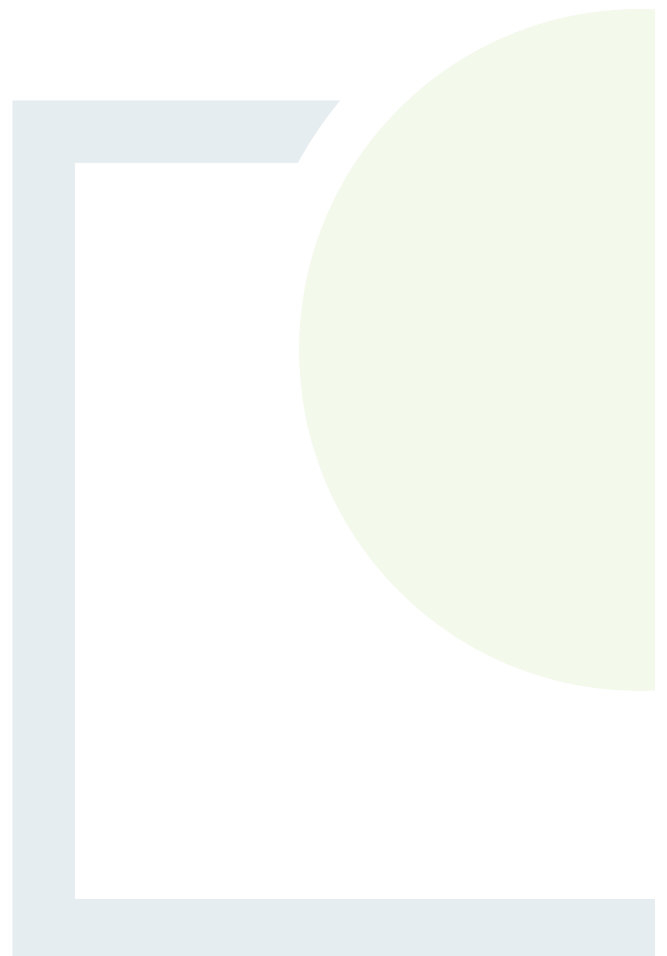
PROJECT	CLIENT		
CARTRON BIG LANDFILL, LONGFORD	CARTRON BIG		
SHEET	Date	Project number	Scale (@ A3-)
	16.09.22	P22-158	1:1000
	Drawn by	Drawing Number	Rev
SFM	P22-158-0601-0006	A	
Checked by	BF		



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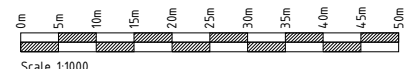
APPENDIX 5

Updated Leachate
Interception Trench: Plan
Drawing





- Legend**
- Carton Big: Anticipated Waste Boundary (23576.155m²)
 - Inspection Chamber
 - Leachate Interceptor Trench
 - - - Leachate Rising Main
 - Leachate Collection Sump
 - Leachate Collection Tank
 - Leachate Collection & Handling Yard



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Rev.	Description	App By	Date
A	ISSUE FOR DISCUSSION	CJC	22.02.19
B	ISSUE FOR DISCUSSION	BF	15.08.22

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CODE	STATUS	SUITABILITY DESCRIPTION	PURPOSE OF ISSUE

PROJECT
LONGFORD LANDFILL REMEDIATION

SHEET
LEACHATE INTERCEPTION TRENCH: PLAN

CLIENT
LONGFORD CO CO

Date	22.02.19	Project number	P1444	Scale (@ A3-)	1:1000
Drawn by	SOC	Drawing Number	P1444-0500-0002		
Checked by	JON	Rev	B		

16 August 2022



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