

W 0001 - 04
Third Party
Submission

Ann Kehoe

From: Brian Meaney
Sent: 17 July 2009 12:37
To: Ann Kehoe
Subject: FW: Submission on Landfill Review Limerick/Clare/Kerry
Attachments: Submission LCK on Landfill licence reviews.pdf

Will you please deal with this. This is a submission for three landfills - North Kerry, Gortadroma and Central Waste Management.
Brian.

From: King Philippa [mailto:pking@limerickcoco.ie]
Sent: 17 July 2009 11:49
To: Brian Meaney
Subject: Submission on Landfill Review Limerick/Clare/Kerry

Hi Brian,
Enclosed please find a region submission in respect of the three landfills in the Limerick/Clare/Kerry Region. This covers details in respect of the Pre-treatment Guidance. The three landfills also have some technical anomalies which they will include separately which I believe may or may not be adjudicated on during the free of charge review.

Please confirm receipt of this submission and please also confirm if you require a hard copy.

Kind Regards,
Philippa King,
Regional Waste Co-ordinator,
Limerick/Clare/Kerry Regional Waste Management Office,
Lissanalta House,
Dooradoyle,
County Limerick.
061 496842 or 087 9160228

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Limerick/Clare/Kerry

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**Licensing Unit,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
Wexford.**

Attention of: **Brian Meaney**

RE: Review of Landfill Licences

Dear Sir/Madam,

The Limerick/Clare/Kerry Region have agreed to make a joint submission in relation to the review specific areas of the following three licences.

- ✚ North Kerry Landfill number W001-03: operated by Kerry County Council
- ✚ Gortadroma Landfill number W0017-03: operated by Limerick County Council
- ✚ Central Waste Management Facility number W0109-01: operated by Clare County Council.

We are aware that under Article 6 of the Landfill Directive imposes a binding obligation effective on the 16th July 2009 for all landfills operational at the time of transposition of the directive and from the 16th July 2001 for any facilities commenced since that date. It is the responsibility of Landfill operators to demonstrate that waste accepted at the landfill has been pre-treated. At the same time we recognise that the document states that this must include the treatment of biodegradable component of the waste to meet the escalating obligations.

Cold-Callers

Cold Callers are in general private householders who are not signed up to a collections service or are not located on waste collection route. In this region we have cold callers dropping residual waste and recycling waste to both transfer stations and landfills. At these sites facilities are provided so as the cold callers can drop the various recyclables into separate containers and the residual waste can then be dropped into another



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container. This is a form of segregation and hence pre-treatment. Each landfill is preparing an acceptance procedure for cold callers that will include details of the acceptable segregation at the transfer station or landfill site and this will be made available to each cold caller.

The region is also reviewing the price for disposal of this waste by cold callers and we would anticipate that this cost should be such that it is line with signing up to a contracted service.

2-Bin Collection System

The Limerick/Clare/Kerry region reviewed all the waste collection permits of the major waste collectors so as to include the introduction of the three bin collection system. Commercial collections commenced in January 2009 at 50% diversion of organic waste. 100% diversion of organic waste from commercial collections will be complete on the 1st Jan 2010. Domestic Collections commence on the 1st September 2009 for 20% of the customer base escalating to 40% by the end of 2010 in line with the National Targets.

In rural areas of the region and particularly in County Kerry, if the national target of 40% of households signed up to a service in the Local Authority functional area have a brown bin and hence a three bin collection system and the landfill is meeting its diversion target, then is it possible for the residual bin from this rural 2-bin collection to go straight to landfill until 2013 or 2016. This would be in for collections in areas of population less than 1500. All urban areas should have a brown bin collection system.

The region seeks confirmation that our proposal on the cold callers and 2-bin system is satisfactory.

Odour control

The region have decided not to include any submission in relation to odour as Jim Moriarity has clarified that the OEE have requested that the licensing dept of the EPA upgrade the licences to the modern template which includes the requirement for an odour management plan and criteria



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for gas collection and management with priority to be placed on landfills with high odour complaint levels.

Queries in relation to this submission can be addressed to Philippa King at 061 496842 or email pking@limerickcoco.ie.

Yours Sincerely

Philippa King
Regional Waste Co-ordinator,
Limerick/Clare/Kerry Region.

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