



Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

Mr Denis McCarthy
Director of Services
Waterford County Council
Arus Brugha
Dungarvan
Co Waterford

Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire

T: +353 53 60600

F: +353 53 60699

E: info@epa.ie

W: www.epa.ie

LoCall: 1890 33 55 99

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75-2

re: Waste Licence Application by Waterford County Council in respect of a facility/premises at Tramore Waste Disposal Site, Tramore Intake & Tramore Burrows, Tramore, Co. Waterford, .

Dear Mr McCarthy

I am directed to refer to the waste licence application documentation submitted in respect of the facility at the above address and to state that it does not comply with Article 12(1) of the Waste Management (Licensing) Regulations 2004. You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed in I, below.

In light of and having regard to the extent and the level of non-compliance with the conditions of the existing licence (Reg 75-1), the Agency wishes to advise that it does not propose to determine the review until such time as the items detailed in II, below have been complied with to the satisfaction of the Agency. The non-compliances were brought to the attention of the Council following an Agency site inspection of 24 January 2005.

I. ARTICLE 12 COMPLIANCE REQUIREMENTS

- 1) As required by Article 12(1)(f), specify all classes of activity concerned with the facility, in accordance with the Third and Fourth Schedule of the Waste Management Acts, 1996 and 2003. State the principal activity and provide a summary description of each class of activity applied for. Note that the use of compost as a soil conditioner is a waste recovery activity, covered under Class 10 of the Fourth Schedule, and not a waste disposal activity under Class 6 of the Third Schedule;
- 2) Specify in tabular form, by reference to the relevant European Waste Catalogue codes, the revised quantities of waste and any new waste types which will be treated, recovered or disposed of at the facility [Article 12(1)(g)];





- 3) Provide information to comply with Article 12(1)(i) of the Regulations in relation to the shredding of bulky green waste prior to being introduced to the composting facility;
- 4) Provide information for the purpose of enabling the Agency to make a determination in relation to the matters specified in paragraphs (a) to (g) of section 40(4) of the Act [Article 12(1)(j)];
- 5) Provide information to comply with Article 12(1)(l) of the Regulations, as follows;
 - a. Provide a status report on the completion of the required infrastructural works as prescribed in Condition 3.11 (Leachate Management Infrastructure), Condition 3.12 (Landfill Gas Management), Condition 3.7 (Waste Inspection & Quarantine Areas), Condition 3.8 (Weighbridge) & Condition 3.9 (Wheel Cleaning) of the current licence (75-1).
 - b. Provide details of the restoration of the landfill with reference to Condition 4.1 of the current licence (75-1).
- 6) In relation to the composting facility, identify monitoring and sampling points and arrangements for monitoring of emissions and environmental consequences of any such emissions [Article 12(1)(m)];
- 7) State the quantities of leachate/liquid waste from the composting facility and arrangements for off-site treatment/disposal, including the destination [Article 12(1)(o)];
- 8) Describe the proposed measures for the closure, restoration, remediation or aftercare of the facility concerned, after the cessation of waste activities. Submit an updated restoration plan for the facility [Article 12(1)(q)];
- 9) State all of the grounds on which the review is made in accordance with Article 12(3)(a) of the Waste Management (Licensing) Regulations 2004;
- 10) Submit the appropriate fee for the review of your licence in accordance with Article 41 of the Waste Management (Licensing) Regulations 2004. Consider the appropriate fee in accordance with the Second Schedule of the Regulations. Note that you have provided a fee of €5,000 for landfill disposal only and have failed to provide the €6,000 fee for recovery of waste;
- 11) Provide details of any impacts on the existing waste licence conditions and justification for any proposed changes to the existing conditions (i.e. proposed changes, which are required in order to be consistent and facilitate the proposed activities at the facility).



II. NON COMPLIANCE WITH EXISTING LICENCE (75-1)

1. Landfill Gas Infrastructure

Infrastructure for the active collection and flaring of landfill gas generated within the landfill was not installed and there was no evidence on-site to demonstrate that the work had started or was about to commence. This should have been installed by 25th September 2002. The Agency issued several notices of non-compliance to the licensee in relation to this matter but the matter remains unresolved. This is a non-compliance with **Condition 3.12.1**.

Corrective Action Required

As detailed in Agency correspondence dated 09/12/2004 (Ref. 75-1/GEN14OC), the proposals for 'Gas Management- Phase I' dated 20/03/2002 were agreed by the Agency on 04/04/2002, this agreement still stands, therefore, this work should commence immediately.

2. Unauthorised Composting of Green Waste

Composting of green waste was ongoing within the facility at the time of the inspection; two compost stockpiles were observed on the maturation slab. A localised 'pine-like' odour was detected adjacent to the green waste storage area. As outlined in previous non-compliances issued to the licensee the composting of waste at this facility is not included in the activities licensed by waste licence registration number 75-1 and the composting activities are therefore unauthorised. This is a non-compliance with **Condition 1.1**.

Corrective Action Required

The Composting operations shall cease immediately.

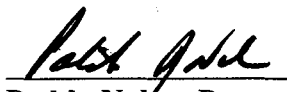
3. Final Cap

Final capping was not installed on cells that were filled to the required level more than eighteen months ago. These filled cells cover a significant area of the landfill. This issue was the subject of previous notifications of non-compliance issued by the Agency to the licensee. It is noted that vehicles were observed arriving at the site with loads of clay/soil. This is a non-compliance with **Condition 5.7.4**.

Corrective Action Required

As detailed in Agency correspondence dated 09/12/2004 (Ref. 75-1/GEN14OC), the licensee must immediately submit the exact specification for the proposed capping system by means of specified engineering works. You are reminded that all specified engineering works must be approved by the Agency prior to commencement of works.

Yours sincerely,



Paddy Nolan, Programme Manager, Office of Licensing & Guidance.

