

# DRAFT

## MEMO

<b>TO:</b> Board of Directors	<b>FROM:</b> Brian Donlon
<b>CC:</b>	<b>DATE:</b> 17 November, 2004
<b>SUBJECT :</b> Ballyogan Landfill Facility/ Ballyogan Recycling Park Technical Committee Report on Objection to Proposed Decision - Reg. No. 15-1	

### Application details

Event	Issue Date(s)	Reminder(s)	Response Date(s)
<b>Proposed decision</b>	30/3/00		
<b>Objections received</b>			18/4/00, 18/4/00, 26/4/00,
<b>Article 25(1) Circulation of objections</b>	16/5/00		
<b>Article 25(2) - Submissions on objections</b>			8/6/00

### Objections received

Objection by Applicant	One
Objection by third party/parties	Two
Submission in relation to Objection	One

1. Dun-Laoghaire- Rathdown County Council,
2. Mr David Rowe, An Taisce, South County Dublin Association, Glenfarn, Woodside Road, Dublin 18
3. Ms Nicola Curry, 15 Ballyogan Wood, Carrickmines, Dublin 18.

One valid submission in relation to the Objections was made on 7<sup>th</sup> June 2000 by:

1. Dun-Laoghaire- Rathdown County Council,

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A Technical Committee was established to consider the objections.

## **The Technical Committee included;**

Brian Donlon, Chairperson  
Regina Campbell, Inspector  
Brendan Foley, Inspector

This is the Technical Committee's report on the objection.

## **A. Objection by Ms Nicola Curry (25/4/00) (on behalf of Ballyogan Environmental Group)**

Ms Curry made an objection on behalf of the Ballyogan Environment Group (BEG) group and included two letters (one undated) and a technical appraisal by Malone O'Regan Environmental Services Ltd.. These will be dealt with below:

### **Ground A1.**

*BEG object to the paying of a fee for the objection as a voluntary organisation. They also raised the issue of time for making submissions by third parties. They request that the Agency can ensure that the month period for submissions doesn't fall over a holiday period. They also state that this development doesn't require formal planning permission as it is excluded.*

### **Technical Committee's evaluation**

The fees payable and the periods for making submission are set out in the Waste Licensing Regulations. The Technical Committee note the comments made on the objection regarding the submission period falling over holiday periods. The Local Authority development does not require formal planning permission because it is a waste facility that requires an EPA licence with its own public notification procedure (Article 9 of SI 261 of 1997).

### **Ground A2.**

*They state that the waste licensing notification procedure infringes the spirit and provision of the 1996 WMA and the principles set out in Agenda 21. They reiterate that there was little or no public consultation with them. They state that statutory newspaper notice was published a full year before the application and that the site notice was in small print metres from the road and not legible. They state that other large projects (e.g. South Eastern motorway) were prepared to scale and placed on public display.*

### **Applicant's Response**

DLRD in their submission on the objection state that the council did consult the public on their proposals. They circulated over 1200 information sheets to houses in the area, complied with statutory newspaper and site notices, arranged visits to other waste facilities for representatives of the residents, arranged an information meeting and submitted a full copy of the application to the residents group.

### **Technical Committee's evaluation**

The Agency decided that the application complied with the site notice and newspaper notice requirements in the relevant Waste Licensing legislation.

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## **B. Letter Undated from Ms Curry**

*In the opening paragraph Ms Curry reiterated every point of objection and submission made by or on behalf of Ballyogan Environmental Group. In the remainder of the objection she outlined her specific objections to various conditions of the proposed decision and to the Inspectors Report.*

### **Technical Committee's evaluation**

This objection was ambiguous and was dealt with by the Technical Committee as follows: The Technical Committee had dealt with the earlier dated objection above (Grounds A1, A2). The earlier submissions had been taken into account by the Inspector and the Board of the Agency during processing of the proposed decision. Reference to items in the earlier submissions which were referred to in this undated letter are dealt with under Ground B.7 below.

### **Ground B1: (Condition 2.7)**

*BEG request that it is made as part of a condition of the licence that a monitoring committee of local residents, concerned bodies and the county council is established before any development takes place.*

### **Technical Committee's evaluation**

The TC consider that this Condition is appropriate to deal with the issues raised. See response to Ground C2 which deals with the timeframe for implementing this Communications Programme.

### **Recommendation**

No Change.
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### **Ground B.2: (Conditions 4.25, 5.11)**

*BEG state that at a recent meeting of the County council a motion to relocate one of the facilities (probably the green waste facility) was passed. They therefore question the need for the 8,000m<sup>2</sup> building. They further state that DLRD have stated that they cannot relocate the green waste facility unless instructed by the Agency which is urged in this objection.*

### **Applicant's Response**

DLRD state in their submission to the objection that they are considering green waste collection depots at two other locations in the County but these are not the subject of this application.

### **Technical Committee's evaluation**

The Proposed Decision deals with the application received and the proposals contained therein.

### **Recommendation**

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No change

## **Ground B.3: (Condition 6.8)**

*BEG urge the Agency to make the “feasibility” of a duty (slip) road a condition of the licence prior to the commencement of construction thereby reducing the problems of industrial type traffic from the facility.*

### **Applicant’s Response**

DLRD state in their submission to the objection that the conditions suggested “requiring a slip road” would be Ultra Vires as they are not in the Council’s power due to the fact that the Council do not own all the necessary lands.

### **Technical Committee’s evaluation**

Condition 4.4 (not Condition 6.8) requires the licensee to examine the feasibility of providing a dedicated road linking the Recycling Park portion of the facility with an intersection of the proposed South Eastern Motorway. The TC agrees that if the Agency included this requirement that the Agency could be acting “ultra vires”.

### **Recommendation**

No Change

## **Ground B.4: (Condition 7.3.1)**

*BEG object to the night time noise limit of 45 dB(A) as they feel that this is still high and is only 10dB less than the day time noise limit.*

### **Applicant’s Response**

DLRD state in their submission to the objection that the Agency’s condition adequately covers this condition.

### **Technical Committee’s evaluation**

It should be noted that noise measurements on the dB(A) scale are logarithmic. The day time and night time noise limits set take into account the recommendations in the Agencies “Guidance Note for Noise in Relation to Scheduled Activities” (1995).

### **Recommendation**

No Change

## **Ground B.5: (Condition 8.3)**

*BEG question how the landfill could be profiled such that no depressions exist and question “whether the Agency are suggesting hills of rubbish or raising the whole landfill level to some 20m high”. They state that it is difficult to imagine what the combined waste management centre and landfill will look like.*

### **Technical Committee’s evaluation**

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Condition 8.3 caters for local depressions where water could accumulate. Conditions 8.1 and 8.2 cater for the final profile of the landfill and the Restoration and Aftercare Plan for the landfill, respectively and reference is made to the relevant drawing detailing the proposed contours in Condition 8.1. This drawing is available for public inspection.

## **Recommendation**

No Change.

## **Ground B.6: (Schedule I)**

*BEG require clarification on notes 1,2,3 of this schedule. They restate their objection to the facility operating outside normal working day (8.30 to 17:30).*

### **Applicant's Response**

DLRD refer to their objection on this matter.

### **Technical Committee's evaluation**

The footnotes to this Schedule relate to unforeseen conditions that may necessitate an extension of the opening hours. However, such extensions must be agreed in writing with the Agency and are not an on-going mechanism to allow extended opening hours. See also response to Ground E. 17 of the DLRD objection.

The TC consider that the Facility Working Day should be revised to allow a specified time period for opening the facility prior to waste acceptance/removal and after all waste has been accepted/removed from the facility.

## **Recommendation**

### **Amend Working Day in the Interpretation**

#### **Working Day (Facility)**

*As per Schedule I of this licence for each facility with an additional half hour prior to commencement of waste acceptance/removal and one hour after the end of waste acceptance/removal.*

## **Ground B.7: General Items relating to Inspectors Report :**

*BEG state that they were unhappy with the response in the Inspectors Report to their health concerns (response to submission No. 4). They have found resistance to getting a baseline health study carried out. Further, they state that their concerns regarding the milking and testing of cows on the storm wetlands were not addressed by the Agency.*

### **Applicant's Response**

DLRD state in their submission to the objection that they consider that all these issues are dealt with in the Council's investigations and submissions and in the Agency's conditions.

### **Technical Committee's evaluation**

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In view of the Technical Committee, the Agency should write under separate cover to the Health Research Board (HRB) and the Eastern Health Board (EHB) in this regard with a view to initiate a study to assess the human health impacts on local residents that are living in close proximity to the landfill. The Agency could partake in this study in so far as it has the expertise to contribute. Any such study would be outside the scope of this licence but all monitoring results that arise as a result of implementation of the licence would be made available to the HRB/EHB Board for their consideration. The Inspector stated in his report that there would be no grazing allowed on the stormwater wetlands.

## **Recommendation**

*No Change.*

## **Ground B.8: General Items:**

*They recommend a separate location for the waste management facility. They state that the organic waste facility is unique for Ireland. They state that they were pleased with the courtesy shown by the Agency and requested an oral hearing.*

## **Technical Committee's evaluation**

Outdoor composting of municipal waste is already undertaken in Ireland by Kerry County Council and Limerick Corporation. Composting technology is widely applied worldwide. Tunnel composting of municipal waste and outdoor composting of green waste is proposed at this facility. The request for an Oral Hearing was heard at an earlier date by the Board of the Agency who decided not to grant an Oral Hearing.

## **Recommendation**

*No Change*

## **C. Objection by Malone O' Regan Environmental Services Ltd (MORES) Objection on behalf of BEG to PD**

BEG retained MORES to provide an objective appraisal of the PD. They state the PD is comprehensive. They accept that the waste licence when implemented provides the best means for managing the environmental performance of Ballyogan Landfill Facility and Recycling Park. However, they feel that the time-scale stipulated for a number of the conditions is too lenient.

## **Ground C1: (Condition 2.5.1)**

*They state that training should cover operational, emergency situations, environmental and health and safety practices at the facility and be incorporated into standard operations procedures.*

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## ***Technical Committee's evaluation***

It is standard practice on EPA waste licence audits to examine all standard operational procedures and the relevant training details of employees.

### ***Recommendation***

No Change.

## ***Ground C.2 (Condition 2.7.1):***

*They request that this be brought forward to within three months of the grant of licence as the BEG are already an organised group and that meetings between the council and BEG resume immediately.*

## ***Technical Committee's evaluation***

The TC agree that the Communications Programme should be brought forward to a period of three months from the date of grant of the licence to keep the residents informed of compliance with their EPA licence conditions and construction developments etc.

### ***Recommendation***

Amend Condition 2.7.1

Within **three months** from the date of grant of this licence, the licensee shall submit to the Agency for its agreement a Communications Programme to ensure that members of the public can obtain information concerning the environmental performance of the facility at all reasonable times.

## ***Ground C3: (2.1.1, 2.1.2, 2.3.1, 2.8.1, 2.8.2)***

*As the landfill site is already in operation for 25 years they state that 2.1.1, 2.1.2 and 2.3.1(EMS, EMS, EMP) be enforced within 6 months of the date of grant of the licence and that the EMS be included in the AER.*

## ***Technical Committee's evaluation***

The TC accept that the landfill is already in operation for 25 years. The TC consider that the timeframe for the submission of the EMS for the facility should be reduced from 18 months to 12 months of the date of grant of the licence. The timeframe for the submission of the EMP and the AER should not change.

### ***Recommendation***

Amend Condition 2.1.1

2.1.1 The licensee shall within **twelve** months from the date of grant of this licence,.....

## ***Ground C4: (2.9)***

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*They state that the Agency should provide a definition for a suitable qualified and experienced manger.*

## **Technical Committee's evaluation**

It is anticipated that the manager appointed will have many years of experience in the field of waste management. The Agency is involved in establishing the FÁS led national waste management training scheme for competent persons and persons nominated to manage facilities will in future be required to achieve “competent status” under this scheme, within a specified time-scale. Further, Condition 2.6 requires the licensee to submit details of the management structure for the Agency’s agreement and it is expected that all these details will be assessed by the Inspector when making his/her decision.

## **Recommendation**

No Change
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## **Ground C5: (Condition 4.3.4)**

*THEY state that in the event of an emergency occurring on-site procedures should be outlined which will allow emergency personnel and vehicles gain access to the site.*

### **Applicant's Response**

DLRD state in their submission to the objection that this is covered in Condition 10.1 of the PD.

## **Technical Committee's evaluation**

The TC consider that this condition as drafted does not cater for access to the facility in the event of an emergency and should be amended accordingly.

## **Recommendation**

Amend Condition 4.3.4:
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Gates shall be locked shut when the facility is unsupervised. <b>Adequate provision for access to the facility in the event of an emergency shall be made.</b>
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## **Ground C6: (Condition 4.3.5)**

*They state that it would also be beneficial to install a CCTV monitoring system on key points along the boundary of the Recycling Park to deter trespassing.*

### **Applicant's Response**

DLRD state in their submission to the objection that they will be installing a CCTV system to monitor the boundary.

## **Technical Committee's evaluation**



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The TC welcome the response from DLRD on that matter and consider that the Condition be amended accordingly.

## ***Recommendation***

### **Amend Condition 4.3.5**

The licensee shall, prior to commencement of waste operations at the Recycling Park, install and maintain a CCTV monitoring system at the main entrance gate of the Recycling Park **and along the boundary of the facility.**

## ***Ground C7: (4.4.3)***

*They state that the feasibility proposal for providing a dedicated slip road servicing the Recycling Park and the issue of the site entrance be carried out by an independent third party. This study should be completed prior to any construction commencing at the Recycling Park. DLRD state in their submission to the objection that the requested slip road is not justified on road design, traffic, land ownership reasons.*

## ***Technical Committee's evaluation***

The TC consider that the Roads Section of DLRD are the best qualified to examine the feasibility of providing a slip road servicing the Recycling Park within the timeframe outlined in the Condition.

## ***Recommendation***

No Change.

## ***Ground C8: (Condition 4.6)***

*They state that an answering machine be installed to record complaints and this should also provide contact details of relevant supervisory personnel.*

## ***Technical Committee's evaluation***

The TC consider that this information would be very useful in the event of out-of-hours complaints and that this Condition be amended accordingly.

## ***Recommendation***

Amend Condition 4.6:

The licensee shall provide and maintain a working telephone, and facsimile machine in the office specified in Condition 4.5 above. **The licensee shall also provide and maintain an out of hours answering machine and a message relaying details of emergency contact numbers in the office specified in Condition 4.5 above.**

## ***Ground C9: (Condition 4.14)***

*They are unclear if these storage tanks will be located above ground or underground. They state that if petrol is used on site then SI No 374 of 1997 be complied with.*

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## **Applicant's Response**

DLRD state in their submission to the objection that the Agency's condition adequately covers this situation.

## ***Technical Committee's evaluation***

It is considered best practice to maintain storage tanks above ground. The Regulations cited by the objector are not relevant in this case as they only relate to control of VOC emissions from the storage and distribution of petrol at terminals.

## ***Recommendation***

No Change.

## ***Ground C10: (Condition 4.14.5)***

*They state that tanks should be tested annually due to the sensitive nature of the site. DLRD state in their submission to the objection that the Agency's condition adequately covers this situation.*

## ***Technical Committee's evaluation***

The TC consider that the Agency's condition adequately covers the situation.

## ***Recommendation***

No Change.

## ***Ground C11: (Condition 4.15)***

*They state that Specified Engineering Works should ensure that all quality assurance validation be independently certified by recognised experts approved by the Agency.*

## **Applicant's Response**

DLRD state in their submission to the objection that the Agency's condition adequately covers this situation.

## ***Technical Committee's evaluation***

The relevant condition (4.15.2) already states that the competent person(s) should be agreed in advance with the Agency.

## ***Recommendation***

No Change.

## ***Ground C12: (Condition 4.16.2)***

*They state a high level alarm be fitted to the foul tank in the Civic waste facility to prevent it overflowing.*

## ***Technical Committee's evaluation***

The TC consider that there would be merits in fitting an alarm to this foul tank.

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## *Recommendation*

### **Amend Condition 4.16.2**

Unless otherwise agreed with the Agency, the licensee shall test and report on the integrity, in accordance with Condition 4.14, of the foul tank that collects contaminated water only from the civic waste facility. The tank shall be fitted with a level indicator **and a high level visual and aural alarm.**

### ***Ground C13: (Condition 4.16.4 (f); 4.17.3 (d))***

*They state that the lining for the lagoon and the storm water wetland should include a mineral layer and HDPE liner as the HDPE liners can be cracked or broken and the permeability of mineral layers can degrade over time.*

#### **Applicant's Response**

DLRD state in their submission to the objection that the Agency's condition adequately covers this situation.

#### ***Technical Committee's evaluation***

These conditions cater for the inclusion of both a mineral layer and a HDPE liner in the leachate and stormwater lagoons.

#### ***Recommendation***

No Change.

### ***Ground C14: (Condition 4.17.4)***

*They state that interim measures to remove dissolved methane in leachate should be implemented immediately following approval of the Agency. DLRD state in their submission to the objection that the Agency's condition adequately covers this situation.*

#### ***Technical Committee's evaluation***

The TC consider that these interim measures are already covered in this condition.

#### ***Recommendation***

No Change.

### ***Ground C15: (Condition 4.21.1)***

*They are concerned about the amount of Civic Amenity waste that can be stored on site at any one time, in particular household hazardous waste. They state that the types of containers to be used should be stipulated particularly for textile and hazardous waste.*

#### **Applicant's Response**

DLRD state in their submission to the objection that they do not intend to use the Civic Amenity Facility for storage of large amounts of waste during slumps in the recycling markets.

#### ***Technical Committee's evaluation***

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Details on the receptacles to be used and agreed with the Agency are already catered for in this condition. Condition 5.13 covers the acceptance and management of wastes at the civic waste facility.

## **Recommendation**

No Change.

## **Ground C16: (Condition 4.23.1)**

*They refer to the Inspectors report and they state that due to the risk of landfill gas accumulation in the building it may be better to relocate the building within the facility to a location which is at lower risk of gas accumulation.*

## **Applicant's Response**

DLRD state in their submission to the objection that the Agency's condition adequately covers this condition and that they noted this risk in their application (Attachment K7 of Vol 1B).

## **Technical Committee's evaluation**

The TC consider that Condition 4.18.6 covers the safe construction of all buildings on the facility.

## **Recommendation**

No Change.

## **Ground C.17 (Condition 5.3)**

*They are concerned that there are not appropriate alternative facilities to accept unsuitable waste. In the event that these facilities are not available, they state that procedures should be outlined detailing how this unacceptable waste will be dealt with.*

## **Applicant's Response**

DLRD state in their submission to the objection that the an extensive range of alternative facilities are available to them.

## **Technical Committee's evaluation**

The TC consider that there are many appropriate alternative EPA-licensed waste facilities capable of accepting various waste types, including hazardous waste. Condition 10.1 will cover the situation whereby there are still no appropriate facilities available in the nearby vicinity.

## **Recommendation**

No change.

## **Ground C.18 (Condition 5.6)**

*They state that due to the fact that scavenging is a major issue and the site is used as a short cut to the golf course that the DLRD be required to submit detailed proposals to the Agency with regards to site security in order to prevent trespassers and scavengers.*

## **Applicant's Response**

DLRD state in their submission to the objection that the Agency's condition 4.3 adequately covers this situation.

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## *Technical Committee's evaluation*

Condition 4.3 adequately covers this situation.

### **Recommendation**

No Change.

## **Ground C.19 (Condition 5.8.2)**

*They state that the timeframe for the procedures relating to deep disposal of wastes should be reduced to three months as this is an existing facility.*

## *Technical Committee's evaluation*

The TC consider that as the facility is existing for 25 years that it is appropriate that the proposals on deep burial of wastes should be submitted within three months of the date of grant of this licence.

### **Recommendation**

Amend Condition 5.8.2 as follows

**Within three months** of the date of grant of this licence, the licensee shall submit to the Agency for its agreement procedures for the acceptance, handling and processing of wastes for deep burial. This shall include provisions to ensure that excavations of waste to allow deep burial do not cause odour or other nuisances.

## **Ground C.20 (Conditions 5.9.3,5.9.5, 5.10)**

*They state that the timescales in the above conditions should be reduced to minimise environmental nuisances. They suggest that waste be baled within 24 hours and that organic waste be introduced into the composting process within 12 hours of delivery. They state that the number of containers stored overnight should be reduced to the minimum needed to commence baling the following morning.*

### **Applicant's Response**

DLRD state in their submission to the objection that the Agency's nuisance conditions adequately covers this situation.

## *Technical Committee's evaluation*

The timeframes set in the above conditions are in keeping with those set at other EPA licensed-facilities and elsewhere. Further, the various sub-conditions in Condition 6 will provide for the control of environmental nuisances.

No change.

## **Ground C.21 (Conditions 5.13)**

*They state that the dissemination of information to the general public on the type of waste that is accepted at the Civic Waste facility should be described.*

### **Applicant's Response**

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DLRD state in their submission to the objection that they intend to disseminate information to the public in an adequate manner.

## ***Technical Committee's evaluation***

There would be merits in including this information on the Site notice Board at the Civic Waste Facility.

## ***Recommendation***

Add to condition 4.2.2

(h) the waste types that can be accepted at the Civic Waste Facility.

## ***Ground C.22 (Condition 6.1)***

*They state that the Agency should cross-check as part of their quarterly audits the site records and inspections with the complaints made by the local community. DLRD state in their submission to the objection that the Agency's condition adequately covers this situation.*

## ***Technical Committee's evaluation***

The Agency as part of their quarterly site inspections routinely check the site records including complaints made in relation to the facility.

## ***Recommendation***

No Change.

## ***Ground C.23 (Condition 6.3)***

*They state that as the site is exposed to high winds that the programme for the removal of existing litter at the facility be submitted to the Agency immediately and not in three months as per the licence condition.*

## ***Applicant's Response***

DLRD state in their submission to the objection that the Agency's condition adequately covers this situation.

## ***Technical Committee's evaluation***

The TC consider that there should be no requirement for a programme to initiate the removal of existing litter in the environs of the facility and that all such litter should be removed within four months of the date of grant of this licence.

## ***Recommendation***

## **Amend Condition 6.3**

### **6.3.1 Daily Litter**

All loose litter accumulated within the facility and its environs, excluding that which is deposited on the working face, shall be removed subject to the agreement of the landowners and appropriately disposed of on a daily basis.

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## 6.3.2 Historical Litter

Within four months of the date of grant of this licence, **all existing historical litter at the facility or the immediate area of the facility, shall be removed subject to the agreement of the landowners and appropriately disposed of.**

### *Ground C.24 (Condition 6.8)*

*They state that road improvements/maintenance are needed and this should not interfere with the feasibility study for the duty road to the site from the South Eastern Motorway.*

#### **Applicant's Response**

DLRD state in their submission to the objection refer to their objection dated 20<sup>th</sup> April 2000 on this matter.

#### **Technical Committee's evaluation**

The TC agree that these road improvements should not interfere with the feasibility study for the duty road. However, the wording of this condition is slightly confusing and should be amended.

#### **Recommendation**

### **Amend Condition 6.8**

The licensee shall submit **proposals to the Agency for its agreement within six months of the date of grant of this licence**, for road maintenance/improvements, traffic control and traffic management along the access roads to the facility.

### *Ground C.25: (Condition 7.3.2)*

*They recommend that a proposed list of noise sensitive receptors should be submitted to the EPA. Monitoring should be undertaken at these sensitive receptors and any others specified by the EPA.*

#### **Applicant's Response**

DLRD state in their submission to the objection that the Agency's conditions adequately cover this concern.

#### **Technical Committee's evaluation**

The TC consider that the sensitive receptors are covered in Schedule F.3.

#### **Recommendation**

No Change.

### *Ground C.26: (Condition 7.3.3)*

*They state that the effect of vibration on the landfill site i.e. within the boundary of the facility should be considered.*

#### **Applicant's Response**

DLRD state in their submission to the objection that the Agency's conditions adequately cover this concern.

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## ***Technical Committee's evaluation***

The TC consider that Condition 9.12 adequately deals with the stability of the side slopes at the facility. Vibrations from construction and operating plant are unlikely to have any significant effects.

## ***Recommendation***

No Change.

## ***Ground C.27: (Condition 7.10.2)***

*They state that it is likely that groundwater and or subsurface water in this area may be contaminated. Therefore it would be important to test the water at the localised de-watering points and surrounding area prior to lowering of the ground water table.*

## **Applicant's Response**

DLRD state in their submission to the objection the Agency's conditions adequately cover this concern and sufficient groundwater monitoring is already carried out on site and indicates that groundwater contamination is not a problem.

## ***Technical Committee's evaluation***

Condition 4.15.2 will ensure that competent personnel will be carrying out this work. Condition 7.10.3 caters for prevention of discharge of substances that could give rise to deterioration of receiving water quality. Condition 3.1 (f) will ensure that any occurrence with the potential for environmental pollution will be recorded as an incident and investigated under Condition 10.8.

## ***Recommendation***

No Change

## ***Ground C.28: (Condition 7.11.10)***

*They state that as per Condition 4.17.4, the timescale should be reduced.*

## **Applicant's Response**

DLRD state in their submission to the objection that the suggested timescale is not considered practical.

## ***Technical Committee's evaluation***

Although Condition 7.11.10 does set a timeframe on meeting ELVs for dissolved methane it should be noted that Condition 7.11.5 will ensure that any discharge to sewer will not contain dissolved methane at concentrations that would give rise to flammable explosive vapours.

## ***Recommendation***

No Change.



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## **Ground C.29: (Condition 9.4)**

*They state that the float switch should be checked and the level of leachate recorded daily.*

### **Technical Committee's evaluation**

The TC consider that daily checking and recording of leachate levels in sumps is sufficient.

### **Recommendation**

No Change.

## **Ground C.30: (Condition 10.1)**

*They state that the ERP should be initiated within six months of grant of licence and that the ERP should also be implemented prior to construction commencing and updated accordingly.*

### **Applicant's Response**

DLRD in their submission to the objection, state that the Agency's condition adequately covers the situation.

### **Technical Committee's evaluation**

Due to the varied waste management facilities that are covered by this licence the TC consider that the ERP should be submitted within six months of the date of grant of the licence.

### **Recommendation**

Amend Condition 10.1

The licensee shall, within **six** months of the date of grant of this licence, submit a written Emergency Response Procedure (ERP) to the Agency for its agreement. The ERP shall address any emergency situations which may originate on the facility and shall include provision for minimising the effects of any emergency on the environment

## **Ground C.31: (Condition 10.2.1)**

*They state that a programme of testing of the fire safety and protection measures should be detailed to comply with International and British Standards and that a programme of fire training should be mandatory.*

### **Technical Committee's evaluation**

The TC consider that there would be merits in carrying out a HAZOP assessment for the entire facility.

### **Recommendation**

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## **Replace Condition 10.2.2 with this one.**

Within six months of the date of grant of this licence a HAZOP Assessment of the facility, or part thereof, shall be carried out by an independent third party whose identity shall be agreed in advance with the Agency. The HAZOP Assessment shall pay particular regard to any accidents, emergencies, or other incidences which might occur on the facility and their potential effect on the environment and on the neighbours of the facility and on adjoining landuses. The Assessment shall include recommendations both to minimise the number of any accidents, emergencies or incidences which might occur and to minimise the impacts of any such events. These recommendations shall be complied with by the licensee. The scope of the Assessment shall be agreed with the Agency in advance.

### ***Ground C.32: (Schedule D: Recording and Reporting to the Agency)***

*They state that the reporting and recurrence of air emission monitoring is not mentioned in Table D1 of this schedule but is mentioned under Schedule F in Table F.4.2. Accordingly, it should be included in Table D1.*

### ***Technical Committee's evaluation***

Monitoring of emissions to Atmosphere and Air Quality is listed on the 9<sup>th</sup> Row of Table D.1.

### ***Recommendation***

No Change.

### ***Ground C.33: General items – Odour***

*They state that there should be a condition to ensure that the activities are carried out in a manner such that odours do not result in significant impairment of, or significant interference with amenities or the environment at or beyond the facility boundary. They also state that on grant of the licence, the licensee should submit a proposal to the Agency for agreement for the assessment of the odours arising from the facility at or beyond the facility boundary. They state that following agreement of the proposal, the licensee should undertake the assessment to ensure that no odour emissions emanate from the facility.*

### ***Applicant's Response***

DLRD, in their submission to the objection, state that Condition 2.3 allows the Agency to comment on the adequacy of environmental management.

### ***Technical Committee's evaluation***

Condition 6.7 of the PD will ensure that odour will not give rise to nuisance at the facility. However, the TC consider that a proposal should be submitted that will enable an assessment of the odours emanating from the facility.

### ***Recommendation***

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## **Include as Condition 6.10**

The licensee shall submit to the Agency, for its agreement, within four months from the date of grant of this licence, a programme for the assessment of odours arising from the facility.

### ***Ground C.34: General items - Procedures***

*They state that procedures for the 'High Wind', 'Flies', 'Bird Control', 'Mud' and the 'Assessment of Odours' should be include under conditions and that this would assist in the management of nuisances from the facility.*

#### **Applicant's Response**

DLRD, in their submission to the objection, state that Condition 2.3 allows the Agency to comment on the adequacy of environmental management.

#### ***Technical Committee's evaluation***

See response to Ground C.33 for the odour assessment proposal. Other environmental nuisances are covered under Condition 6.

#### ***Recommendation***

No change.

### ***Ground C35: General items – Warning and Action Limits***

*They state that a condition for the setting of Warning and Action Limits for Surface Water should be included in the Waste Licence, to ensure that contaminated surface water is not discharged from the facility.*

#### **Applicant's Response**

DLRD, in their submission to the objection, state this is adequately covered in the Agency's conditions – Schedules F5, F6 and F7.

#### ***Technical Committee's evaluation***

Table F.6.1 requires monitoring at the inlets to the stormwater wetlands. However, the TC consider that there would be merits in setting warning and action levels for discharges of water to the stormwater wetlands to ensure protection of the receiving surface water.

#### ***Recommendation***

## **Include as Condition 9.15.**

Within three months of the date of grant of this licence, the licensee shall submit to the Agency for its agreement proposals for continuous monitoring of water entering the stormwater wetlands. These proposals shall include the criteria/trigger levels which will determine when the outlet from the stormwater wetland shall be closed. Such continuous

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monitoring shall as a minimum, include flow, conductivity, pH and TOC an shall be carried out on the inlet to the stormwater wetlands.

## **D. Mr David Rowe made an objection on behalf of An Taisce.**

Mr Rowe stated that the Proposed Decision appears to be excellent but had two comments to make.

**Ground D.1** *Mr Rowe stated that there appears to be no reference to the timing of the opening of the operation and that there should be provision that it should not be opened for use until the M50 is completed to the Carrickmines interchange.*

### ***Technical Committee's evaluation***

The TC consider that timeframes for the opening of the various facilities have been outlined in various Conditions such as Conditions 4.21, 4.22, 4.23, 4.24. The opening of the waste management facilities as proposed in this application should not be dependent on another project that is outside the control of the licensee.

### ***Recommendation***

No change.

**Ground D.2** *Mr Rowe suggested including a new Condition 2.7.3 to cater for the summarising of monitoring results and improved dissemination of the information to the local community.*

### ***Technical Committee's evaluation***

The TC in dealing with an earlier objection (see Ground C2 above) recommended that the communications programme be submitted within three months not the 12 months as stipulated in the PD. The summarising of results into a more readable format as suggested in this objection is a requirement of the AER.

### ***Recommendation***

*See Response to Ground C2.*

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## E. Dun Laoghaire- Rathdown County Council

Dun Laoghaire- Rathdown County Council (DLRD) made an objection to the Proposed Decision. They stated that all specified time periods should include a phrase “unless otherwise agreed” to cater for unforeseen delays. The specific conditions which they objected to are outlined below.

### ***Ground E.1: (Condition 2.6)***

*DLRD objected to the requirement for written details of the management structure of the facility to be submitted within nine months of the date of grant of the licence. They state that the condition should read at least two months prior to the commencement of waste activities at any facility in the Recycling Park.*

### ***Technical Committee’s evaluation***

The TC consider that this information should be submitted within the time period and at least two months prior to the commencement of waste activities in the Recycling Park. This condition covers any proposed changes in the management structure.

### ***Recommendation***

Amend Condition 2.6

Within nine months from the date of grant of this licence and **at least two months prior** to the commencement of waste activities at the Recycling Park, the licensee shall .....

### ***Ground E.2: (Conditions 3.10,3.11)***

*DLRD object to the recording of all waste types, under headings (a) to (i) arriving at the Civic Waste facility with the exception of the person checking the load (h)*

### ***Technical Committee’s evaluation***

This requirement appears to be extremely onerous and should be amended.

### ***Recommendation***

Amend Condition 3.10:

The licensee shall maintain a written record for each load of waste arriving at or departing from the facility, **excluding those waste arriving at the Civic Waste Facility for which item (h) below shall be recorded.**

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## **Ground E.3: (Condition 4.3)**

*DLRD object to the requirement to provide stone wall façade to all boundary walls as this could not be justified because of the high costs involved.*

### **Technical Committee's evaluation**

The TC consider that these details need to be submitted to the Agency for agreement and that an appropriate façade is provided to all boundary walls.

### **Recommendation**

Amend Condition 4.3.2 (b)

Submit to the Agency for its agreement and prior to construction, fencing and gate design details. This shall include a stone wall façade, **or equivalent as agreed with the Agency**, to the fencing designated by the: .....

## **Ground E.4: (Condition 4.17.2)**

*DLRD object to the 12 month time period for the installation of the leachate management system and suggest that the minimum period in which this could be done is 24 months.*

### **Technical Committee's evaluation**

The TC consider that the time period in Condition 4.17.2 is sufficient to carry out the works necessary to manage leachate more efficiently at the facility.

### **Recommendation**

No change

## **Ground E.5: (Condition 4.17.4)**

*DLRD object to the 12 month time period for the installation of plant to remove dissolved methane in leachate and suggest that the minimum period in which this could be done is 24 months.*

### **Technical Committee's evaluation**

The TC consider that the time period in Condition 4.17.4 is sufficient to install a methane stripping plant. This plant-type is widely used at UK landfill sites and is currently being installed at Kinsale Road Landfill (Reg. No. 12-1)

### **Recommendation**

No change.

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## ***Ground E.6: (Condition 4.18.1)***

*DLRD object to the 12 month time period for the installation of equipment to collect and recover or flare landfill gas in areas not already covered by the active collection system. They state that this could be done within 24 months as they will also need to discuss matters relating to landfill gas with the on-site company utilising the gas for electricity generation.*

### ***Technical Committee's evaluation***

The extension of the landfill gas collection system should be carried out within the 12 month time period. However, the wording “*unless otherwise agreed with the Agency*” is included in this condition and will cater for any unforeseen dealys

### ***Recommendation***

No Change
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## ***Ground E.7: (Condition 4.18.3)***

*DLRD object to the requirement to upgrade open gas flares to enclosed flare units as the existing gas flare unit is only used in emergency situations. They estimate that this upgrade would cost £100,000 and would not be used over the next 10 years.*

### ***Technical Committee's evaluation***

The TC consider that as the existing open flare is only used in emergency situations that it is not considered necessary to upgrade in that situation. However, the licensee is required under Condition 4.18.1 above to install systems for collection / recovery or flaring. The TC consider that any new flares brought in to satisfy condition 4.18.1 should be enclosed flare units and that Schedule F be amended to cater for monitoring of enclosed flares.

### ***Recommendation***

Remove Condition 4.18.3.
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Add new Condition 4.18.3
--------------------------

<b>Unless otherwise agreed with the Agency, subject to Condition 4.18.1 above, landfill gas flaring except in emergency circumstances shall be in enclosed flare units.</b>
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Amend Schedule F. Footnote 4 to Table F.2.2
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<b>Note 4. Continuous CO monitor on enclosed flares.</b>
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## ***Ground E.8:(Condition 4.19)***

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*DLRD object to additional capping than the present 1m of clay which covers 80% of the landfill stating that these significant changes have serious environmental implications and could result in excessive costs. DLRD quote that the company that operate the landfill combustion plant (Irish Power) have stated that ‘the type of cap combined with the leachate management they are proposing will starve the bacteria of moisture and cease the degradation and thus the gas production.*

## **Technical Committee’s evaluation**

The TC consider that areas previously restored do not need to incorporate the cap as stipulated in the PD. Many personnel involved in landfill design and operation were consulted (including Irish Power) in drafting the Agencies “Landfill Site Design Manual”. The TC consider that the cap stipulated in the PD is considered to be best practice for previously uncapped cells.

## **Recommendation**

### **Amend Condition 4.19**

#### **Add New Condition 4.19.1**

Within three months of the date of grant of this licence, the licensee shall submit a report on those areas of the landfill that have previously been restored. This report shall include details on (i) the areas that have been restored, (ii) the type of capping installed, (iii) the state of the restored areas and (iv) recommendations. Any recommendations arising from this report shall be implemented as instructed by the Agency.

**Renumber old Condition 4.19.1 to become Condition 4.19.2 which applies to areas to be capped.**

## **Ground E.9: (Condition 4.21.1)**

*DLRD object to the period of 12 months for the provision and maintenance of a Civic Waste facility and suggest that the minimum period in which this could be done is 21 months.*

## **Technical Committee’s evaluation**

The wording “unless otherwise agreed” is already included in this condition and will cater for any unforeseen delays.

## **Recommendation**

*No Change*

## **Ground E.10: (Condition 4.22.1)**



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*DLRD object to the period of twelve months (even though 18 months is given in Condition 4.23.1) for provision and maintenance of a green waste composting area and suggest a period of 24 months for completion.*

## **Technical Committee's evaluation**

The wording “unless otherwise agreed” is already included in this condition and will cater for any unforeseen delays.

## **Recommendation**

No Change

## **Ground E.11: (Condition 4.23.1.)**

*DLRD object to the period of twelve months (even though 18 months is given in Condition 4.23.1) for provision and maintenance of an organic waste composting area and suggest a period of 24 months for completion.*

## **Technical Committee's evaluation**

The wording “unless otherwise agreed” is already included in this condition and will cater for any unforeseen delays.

## **Recommendation**

No Change

## **Ground E.12: (Condition 4.25.1)**

*DLRD state that they are not clear as to what boundary Condition 4.25.1 refers to. They state that the change should only relate to the existing property boundary on the western side.*

## **Technical Committee's evaluation**

The TC consider that it is clear that facility boundary relates to all boundaries of the facility. Further, the TC consider that any relocation of this building (or the proposed baling station) should not have a noise impact on nearby residences. The TC note that in the waste licence application (Volume 11 of 13) that the licensee stated that it could meet the following limits daytime 55 dB Laeq, 1 h (07:00 to 21:00), Nighttime 45 dB Laeq 45Laeq, 1h (21:00 to 7:00). The TC point out that these noise emission limits are set at 30 minutes in Schedule G.1 and that daytime/nighttime emission limits are provided in the Interpretation to the PD. Consequently, a report from the objector to state that it will meet these noise limits should be submitted for the Agency's agreement.

## **Recommendation**

Add Condition 4.25.2

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The licensee shall submit a report to the Agency for agreement describing the measures to be implemented to ensure that noise from the relation of the Materials Recovery/Recycling Building and the Baling Station shall meet the limits set out in Schedule G.1 of this licence.

## **Ground E.14:**

*DLRD object to the period of twelve months for submission of proposals regarding the utilisation of heat energy from the site and suggest a period of 24 months for submission of proposals.*

## **Technical Committee's evaluation**

The TC consider that the timeframe as stipulated in the PD is appropriate.

## **Recommendation**

*No Change.*

## **Ground 14: (Condition 4.29)**

*DLRD object to the period of nine months for the installation of landscape features within and around the Recycling Park and suggest a period of 21 months as none of the facilities are likely to be in operation for at least 21 months. They suggest the condition should read 'unless otherwise agreed with the Agency the licensee shall install landscaping features within and around each facility between 3 months of completion the completion of construction.*

## **Technical Committee's evaluation**

The TC note that the words "unless otherwise agreed" are included for the civic waste facility, green waste and organic composting facilities (Conditions 4.21, 4.22, 4.23) and consider that there should be also a provision for unforeseen time delays for the installation of landscape features.

## **Recommendation**

### **Amend Condition 4.29**

Within nine months of the date of grant of the licence, the licensee shall install landscape features within and around the Recycling Park, **unless otherwise agreed with the Agency**. This shall incorporate planting of trees and shrubs recommended in Section 5.2 Terrestrial Ecology, Volume 9 of the application.

## **Ground E.15: (Condition 5.2)**

*DLRD suggest that quantities be amended to :-*

*225,000 tonnes per annum instead of 210,000 tonnes (recycling park)*

*170,000 tonnes per annum instead of 120,000 tonnes (combined quantities for disposal from the baling station and that to Ballyogan landfill). Schedule H should be amended*

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to include the above and also amend the quantity at the Civic Waste Facility to 15,000 tonnes.

## **Technical Committee's evaluation**

The TC consider that the quantities detailed for the baling of waste in this condition have regard to the Waste Management Plan for the region. The quantity of waste for baling is restricted to 120,000 which provides a reserve capacity of 20,000 tonnes (Section 3.2.2.9 of the EIS). The quantity of waste that can be accepted at the civic waste facility should be increased to 15,000 tpa and the total at the Recycling Park be increased by 5,000 tpa. However, Condition 5.2 allows for minor increases in the quantity of waste that can be accepted and removed from the facility, subject to the agreement of the Agency.

## **Recommendation**

### **Amend Condition 5.2 (c)**

the quantity of waste to be accepted at the Recycling Park shall not exceed **215,000** tonnes per annum

### **Amend Schedule H (Other Units are not changed)**

<b>Unit</b>	<b>Maximum Quantity (tonnes per Annum)</b>
Ballyogan Recycling Park	215,000
Civic Waste Facility (Recycling Park & Landfill)	15,000

## **Ground E.16.( Condition 5.3)**

*DLRD suggest that refuse freighters which collect the household waste should be excluded from the requirement of visual inspection on arrival and it is not possible to inspect this refuse until the freighter is emptied.*

## **Technical Committee's evaluation**

The TC agree with this objection and suggest that the requirement to visually inspect these refuse freighters prior to their unloading should be not be required.

## **Recommendation**

### **Amend Condition 5.3**

Each load of waste arriving at the facility shall be visually inspected in accordance with "Level 3: On-site Verification" outlined in the Agency's Draft Manual on Waste Acceptance. Any wastes deemed to be in contravention of this licence and/or unsuitable for disposal at this facility shall be removed for recovery / disposal at an appropriate alternative facility.

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## **Ground E.17: (Condition 5.5.1)**

*DLRD seek clarification on some of the hours of waste acceptance set out in Schedule I and suggest some of their own. (A) Increase by 2 hours the waste acceptance at the Baling Station, organic and green waste composting facilities to 8:00 to 18:00 on Saturdays/Bank Holidays; This would cater for Saturday working in lieu of bank Holidays. (B) Open the baling station, the materials recovery building, and the organic waste composting building on Sundays from 8:00 to 16:00; This would cater for the removal of waste from the Civic Waste Facility to the appropriate facility and would be entirely within the Recycling Park. (C) Open the Green waste Composting facility on Sundays from 8 to 18:00.*

### **Technical Committee's evaluation**

- (a) The TC consider that there are merits in allowing an additional 2 hours to cater for Saturday working in lieu of Bank Holidays (see new footnote Note 4 to Schedule I).
- (b) Under Condition 4.21.1, the licensee is required to submit details of waste receptacles at the Civic Waste Facility to the Agency for agreement. Provision should be made at that time to cater for the maximum tonnages to be accepted. The TC consider that there be no change under this item.
- (c) The TC consider that in order to satisfy Condition 5.13.2 there is a requirement to open green waste facility after the closure of the civic waste facility on Sundays.

### **Recommendation**

Amend Schedule I

### **Hours of Waste Acceptance / Removal**

Facility	Day	Hours of Waste Acceptance/Removal <sup>Note 1</sup>
Landfill	Monday – Friday Saturday / Bank Holiday Sunday	08.00 – 18.00 08.00 – 16.00 Closed
Baling Station	Monday – Friday Saturday / Bank Holiday Sunday	08.00 – 18.00 <sup>Note 2</sup> 08.00 – <b>16.00</b> <sup>Note 3,4</sup> Closed
Green Waste Composting	Monday – Friday Saturday / Bank Holiday <b>Sunday</b>	08.00 – 18.00 08.00 – <b>16.00</b> <sup>Note 4</sup> <b>08.00-18.00</b>
Materials Recovery / Recycling	Monday – Friday Saturday / Bank Holiday Sunday	08.00 – 18.00 08.00 – 16.00 Closed
Organic Waste Composting	Monday – Friday Saturday / Bank Holiday Sunday	08.00- 18.00 08.00 – <b>16.00</b> <sup>Note 4</sup> Closed
Civic Waste Facility (Recycling Park & Landfill)	Monday – Saturday Sunday / Bank Holiday	08.00 – 18.00 08.00 – 18.00

Note 1: Hours of operation relate to that for waste acceptance at or waste removal from the facility and may be altered subject to the agreement of the Agency.

Note 2: Unless otherwise agreed with the Agency baled waste may be removed from this facility for transport to Arthurstown Landfill commencing at 07.00.

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Note 3: Unless otherwise agreed with the Agency baled waste may be removed from this facility for transport to Arthurstown Landfill commencing at 08.00.

Note 4: These facilities can accept/remove waste up to 18:00 on Saturdays prior to Bank Holidays.

## **Ground E.18: (Condition 5.7)**

*DLRD suggest that Condition 5.7 be modified to allow smoking in the Canteen on the existing landfill and in the Amenity / Admin Building.*

### **Technical Committee's evaluation**

The TC agree with this objection and recommend that the Condition be amended to cater for smoking on the existing landfill and in the Amenity/Admin Building.

### **Recommendation**

#### **Amend Condition 5.7**

No smoking shall be allowed on the facility other than **in the canteen on the existing landfill and** in the Amenity/Admin Building as shown on Drawing No. BRP/EPA/08 'Ballyogan Recycling Park Details of Infrastructure', Volume 13.

## **Ground E.19 (Condition 5.8.5)**

*DLRD suggest that Condition 5.8.5 be modified to only two working faces shall exist at anyone time for the deposit of waste other than cover or restoration materials – one for the waste from the Civic Waste facility and one for the deposit of the remainder of the waste. They state that the existing Facility is remote from the refuse Tipping face and a more convenient Tipping face is used for Civic waste to facilitate operations and reduce costs.*

### **Technical Committee's evaluation**

The TC consider that it is not good practice to allow for two working faces at any landfill.

### **Recommendation**

No Change.

## **Ground E.20: (Condition 5.9.4)**

DLRD suggest a change to 18:00 hours Saturday instead of 16:00 Saturday for the floor of the baling station, the hopper and balers to be cleaned of waste (their Revision Schedule I).

### **Technical Committee's evaluation**

See Response to Ground E.17 (Item A) and amend accordingly.

### **Recommendation**

Amend Condition 5.9.4

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At the end of the working week (16:00 hrs Saturday, **or 18:00 on Saturdays before Bank Holidays**) the floor of the baling station, the hopper and balers will be cleaned of all waste.

## **Ground E.21. (Condition 6.8)**

DLRD object to the timeframe of six months for the submission of proposals for road maintenance/improvements, traffic control and management etc., and suggest a period of 12 months for submission of these proposals.

### **Technical Committee's evaluation**

The TC consider that a timeframe of six months is appropriate for the submission of proposals for road improvements/maintenance.

### **Recommendation**

No Change.

## **Ground E. 22. (Condition 7.5.2, 7.5.3)**

DLRD seek the deletion of Conditions 7.5.2 and 7.5.3 stating the reason that landfill gas collected is used for electricity generation and it is not expected that any gas will be flared – until the combustion engines are removed (at least 10 yrs hence).

### **Technical Committee's evaluation**

The TC accept that the use of the flare at present is only in emergency situations. However, there may be a requirement to install a new flare for the collection of on areas of the landfill not already covered by an active gas collection system(Condition 4.18.1). In this case an enclosed flare would be required and these conditions would be relevant. These conditions should be amended to clarify this matter.

### **Recommendation**

#### **Amend Condition 7.5.2**

**Upon installation, enclosed** landfill gas flare units shall meet the emission limit values specified in *Schedule G: Emissions Limits*.

#### **Amend Conditon 7.5.3**

7.5.3 The concentration limits for emissions to atmosphere specified in this licence shall be achieved without the introduction of dilution air and shall be based on gas volumes under standard conditions of :-

a ) in the case of **enclosed** landfill gas flare:

Temperature 273 K, pressure 101.3 kPa, dry gas at 3% oxygen; and

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b) in the case of landfill gas combustion plant:

Temperature 273 K, pressure 101.3 kPa, dry gas at 5% oxygen

## ***Ground E.23:***

DLRD suggest that the LFG combustion plant monitoring frequencies should be revised to CH<sub>4</sub>, CO<sub>2</sub>, and O<sub>2</sub> – monthly

Volumetric flow rate, SO, NO<sub>x</sub> – Annually.

DLRD state that methane is continuously monitored and that alarms are set off if CH<sub>4</sub> drops below a certain level. As there is continuous variation it is felt that weekly monitoring would serve little purpose. They also feel that the other parameters of volumetric flow SO<sub>2</sub> and NO<sub>x</sub> could be measured at the same time as that specified for the other parameters.

## ***Technical Committee's evaluation***

The TC consider that the monitoring required is not onerous and is appropriate for the facility type. However, Table F.2.2 should be amended to clearly indicate that the monitoring frequency for flares relates to enclosed flares.

## ***Recommendation***

### **Amend Title to Table F.2.2**

Landfill Gas Combustion Plant <sup>Note 1</sup>/**Enclosed** Flare Monitoring

### **Amend Footnote 4 to Table F.2.2**

**Note 4. Continuous for enclosed gas flare(s)**

## ***Typographical Error***

Schedule G G1. Noise Emission limits – should read:

“Measured at monitoring points indicated on Table ***F.3.1***”

Signed: \_\_\_\_\_

Brian Donlon  
Technical Committee Chairperson

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