

INSPECTORS REPORT

Waste Licence Register Number: 16-2

Applicant: Wexford County Council

Facility: Killurin Landfill Site, Newtown Lower, Killurin, Co. Wexford.

Inspector: Damien Masterson

Inspector's Recommendation: That a revised Waste Licence be granted subject to conditions.

(1) Introduction

This report relates to an application by Wexford County Council for a review of the existing Waste Licence for Killurin Landfill (WL Reg. No. 16-1, issued 19/11/1999). The facility is located in what once was a sand and gravel quarry on a meander of the Eastern Bank of the River Slaney approximately 11km from Wexford town and 15km from Enniscorthy. It was periodically used as a landfill in the 1970's and early 1980's. Wexford Co. Council purchased the site and commenced landfilling operations in 1985. The site covers approximately 10.7 hectares of which 4.9 hectares is landfill.

The landfill was developed on the "*dilute and disperse*" principle and is not lined. The site forms part of an existing proposed NHA and is directly adjacent to a candidate Special Area of Conservation (cSAC).

The licensee proposes to extend the central part of the landfill (approx. 2.5 hectares) vertically to a final height of 31.5m AOD as opposed to 25m AOD under the current licence. The purpose of the change of profile is to provide void capacity for approximately 64,000 tonnes of waste and to extend the estimated life of the landfill by approximately 13 months.

The proposal for a vertical extension of the facility incorporates the installation of a separation liner and a drainage layer over the previously deposited wastes and the construction of an earthen bund around the area of the proposed extension. The function of the separation system is to provide for the collection of leachate from waste deposited in the extension.

Wexford Co. Council has also developed a civic waste facility at the site since it was granted Waste Licence 16-1. There are four houses within 100 metres of the facility, two of which are approximately 20m from the site fence on the north side of the road from Kyle cross to Killurin bridge. Landfill gas sensors are installed in these two dwellings. Wexford Co. Council applied to the Agency for a Waste Licence for a new facility including a landfill in August 2003. However, Killurin landfill still represents the only major waste disposal facility for County Wexford.

The classes of activity applied for by the applicant and that I recommend be granted are:

Waste Disposal Activities – 3rd Schedule

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|---------------------------------|---|
| <i>Class 1</i> | Relates to the process of landfilling of non-hazardous household and commercial wastes. |
| <i>Class 4</i> | Relates to the storage of leachate in leachate storage tanks. |
| <i>Class 12/Class 13</i> | Relates to storage and repackaging of waste deposited in the civic waste facility prior to removal to the landfill or off-site to an appropriate facility for disposal. |

Waste Recovery Activities – 4th Schedule

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|------------------------|--|
| <i>Class 2</i> | Relates to the storage of paper, cardboard, wood, Christmas trees and waste oils at the civic waste facility prior to recycling. |
| <i>Class 3</i> | Relates to the receipt and storage prior to collection of scrap metals, white goods and cans. |
| <i>Class 4</i> | Relates to the receipt and storage prior to collection of bottle glass, clothing, batteries and fluorescent tubes. |
| <i>Class 9</i> | Relates to the future use of landfill gas for the generation of electricity. |
| <i>Class 10</i> | Relates to the spreading of composts or treated sludges or other wastes on the landfill as part of the restoration of the facility. |
| <i>Class 11</i> | Relates to activities in the civic waste facility. |
| <i>Class 12</i> | Relates to the exchange of waste at the civic waste facility. |
| <i>Class 13</i> | Relates to activities in the civic waste facility and the temporary storage of waste prior to removal off-site for reuse, recovery or recycling. |

Class 1 of the Third Schedule is the **Principal Activity** applied for.

The classes of activity applied for by the applicant and that I recommend be refused are:

Waste Disposal Activities – 3rd Schedule

- | | |
|-----------------------|---|
| <i>Class 2</i> | The use of lime stabilised sewage sludge as cover on the landfill is not acceptable due to the likelihood of making a significant additional contribution to leachate generation. |
| <i>Class 7</i> | The drying of lime-treated sewage sludge on the surface of the landfill is not acceptable due to the likelihood of making a significant additional contribution to leachate generation. |

Class 10

The direct discharge of untreated/partially treated leachate to the naturally occurring reedbeds at the facility is not acceptable as no relevant technical details on possible treatment systems or the quality of leachate to be discharged were submitted to the Agency.

The environmental impacts and associated mitigation measures at the existing facility are addressed in the Inspector’s Report (see appendix II) that accompanied the Proposed Decision for the existing Waste Licence 16-1.

EIS Required	No.
Number of valid submissions received	31

FACILITY VISITS:

DATE	PURPOSE	PERSONNEL
30/05/02	Site notice check	Helen Maher
17/07/02	Site Inspection	Dave Shannon/Olivia Cunningham
09/08/02	Site Inspection	Brendan Wall/Dave Shannon
20/08/03	Site Inspection	Damien Masterson/Olivia Cunningham
09/01/03	Site Inspection	Dave Shannon
12/06/03	Site inspection	Damien Masterson/Olivia Cunningham
16/06/03	Site Inspection	Dave Shannon

Appendix I contains 1.) Drawing 2 (Location) the proposed facility layout and site boundaries.

(2) Issues arising from this Application for Review

1. *Separation liner over existing waste:* In the application to increase the height of the final profile of the landfill, the applicant has proposed to install a separation liner over the existing waste which is nominally 0.5 metres thick and consisting of a 75mm thick layer of “blinding”, using quarry dust, sand or other similar approved fine material; a Geo-composite Clay Liner equivalent in permeability performance to a 1 metre layer of clay; a protection layer of the same material as the “blinding layer” and a 300mm thick drainage layer incorporating slotted drains overlain with a geo-synthetic filter fabric. The primary purpose of the separation liner is to provide for the collection of leachate generated within the waste deposited in the extension. However, the installation of such a liner may pose difficulties for the installation of efficient landfill gas collection infrastructure of landfill gas for the main body of the landfill and might also pose significant engineering challenges due to settlement of the existing waste perhaps leading to ponding of leachate. Also, the waste that will be deposited in the extended portion of the facility will represent approximately 8.6 % of the total quantity

of waste to be deposited over the total lifetime of the landfill. On this basis, I do not consider it BAT (Best Available Technology) to install a separation liner to provide for the collection of leachate from such a small proportion of the overall waste body and that resources can be better employed in minimising leachate production at the facility through the capping of the side slopes and by employing additional measures to optimise leachate interception and collection.

2. Capping of side slopes of existing landfill: The applicant identifies capping of the side slopes of the facility as essential for the minimisation of leachate generation at the facility and to improve surface water control and the overall appearance of the facility. A proprietary system for capping of the side slopes is proposed in the application and final design will be agreed under **Condition 3.2** of the recommended PD, Specified Engineering Works. **Condition 4.3.1** sets out the specification for the final capping of the remainder of the facility and **Condition 4.3.2** requires that all existing side slopes of the facility be finally capped within twelve months of the date of grant of the licence.

3. Increase in final height of landfill: The licensee has proposed to increase the final height of the landfill from 25mAOD to 31.5mAOD to provide additional capacity at the facility. The separation liner that was proposed would be approximately 0.5 meters thick and as this is not being required I am recommending that the maximum final height of the landfill be limited to 31mAOD. With the additional settlement of 15 to 20 % of the waste body which can be anticipated this will reduce the ultimate final profile to an appreciable extent and reduce the overall impact of the finished landform.

4. Visual Impact: While the application states that the landfill is quite well screened in some respects, it does identify that existing landfill operations are visible from a number of viewpoints and that the existing facility already has a significant adverse effect particularly on the residential properties located directly north of the site at “The Deeps”. While the proposed extension will increase the overall height of the profile the applicant asserts that the effect will not be significant. I consider that the proposed extension will have a slight additional negative impact on the residents nearest the landfill during its operational phase. However, I also consider that this impact will be mitigated by the capping and planting of the side slopes and by the requirement that the remainder of the landfill be capped and restored within eighteen months of the final waste profile at the facility being achieved (**Condition 4.6**).

5. Proposal to discharge treated leachate to the reed bed system: The application makes reference to possibly installing a leachate treatment system in the future at the facility that would discharge treated/partially treated leachate to the reedbed system. The reedbed system is naturally occurring and forms part of the cSAC and the proposal was not accompanied by appropriate technical information to allow a thorough assessment. On that basis I recommend refusal of activity *Class 10* of the *Third Schedule* as outlined in the Introduction above.

6. Use of lime stabilised treated sewage sludge as daily/intermediate cover: The licensee proposes to continue the practice of placing this material on the surface of the landfill as intermediate cover and to accept 5,000 tonnes per annum of this material. However, the Agency has issued notices of non-compliance in relation to this issue as it was never agreed with the Agency and the disposal/recovery of sludge in this manner is not considered BAT. I also consider that treated sewage sludge would make a significant additional contribution to the generation of leachate at the facility. Therefore, I recommend that the acceptance of sewage sludge for disposal at this facility should be prohibited and that *Classes 2 and 7* of the Third Schedule relating to this activity be refused as referred to in the Introduction above. Limited quantities of lime stabilised sewage sludge may be accepted for recovery for its nutrient value during the restoration phase by landspreading under Class 10 of the Fourth Schedule in accordance with a Nutrient Management Plan and in accordance with The Use of Sewage Sludge in Agriculture Regulations.

7. Surface Water Management: The licensee installed a lined surface water drain along the northern and eastern boundaries of the landfill. These drains have been maintained and will be used to carry run-off from the final cap safely and cleanly to the River Slaney. **Condition 3.14** of the recommended PD requires that effective surface water management infrastructure be provided and maintained at the facility and that the licensee submit a proposal to agree designated surface water discharge points within three months of the issue of the revised licence.

(3) Facility Development

Leachate Management

The existing landfill is unlined and situated in an excavated sand and gravel quarry. However, the licensee has installed 13 leachate extraction wells and leachate is being pumped from these wells to draw down the level of leachate within the landfill and stored in leachate storage tanks at the facility prior to tankering to Enniscorthy Wastewater Treatment Plant (WWTP). Wexford Co. Council intends diverting the leachate to the new WWTP for Wexford town at Drinagh when it is commissioned. It is also planned to reduce leachate generation at the facility by capping the side slopes of the facility (**Conditions 4.3.1 and 4.3.2**).

Landfill Gas Management

A perimeter landfill gas collection system and an enclosed flare have been installed at the facility and it is planned to extend this system to extract landfill gas from the main body of landfill in conjunction with capping the side slopes of the facility. This step is essential to the effective management of landfill gas at the facility and **Condition 3.13.2** requires that it is carried out within six months of the date of grant of the licence. The licensee also plans to install a utilisation plant at the facility that will produce electricity for the National Grid.

Scrap Metal Area: A concrete slab for the storage of scrap metal has been installed. Runoff from this area passes through a three chamber oil interceptor. Oil from the interceptor is removed to the waste oil storage tank weekly and the remaining effluent is collected in the leachate storage tanks prior to tankering to Enniscorthy WWTP for treatment.

(4) Waste Types and Quantities

Conditions 1.4 and **1.5** of the recommended PD allow for Household, Municipal, Commercial, Industrial and Construction and Demolition wastes to be recovered and disposed of at the facility. *Schedule A - Table A.1 Waste Categories and Quantities* limits the quantity of waste to be accepted at the facility.

The application is to continue to accept 70,000 tonnes per annum and the recommended PD provides for this. The recommended PD (**Condition 5.3**) also requires the development and submission to the Agency of Waste Acceptance and Characterisation procedures having regard to *EU Decision (2003/22/EC) on establishing the criteria and procedures for acceptance of waste at landfills*.

(5) Enforcement Summary

The Agency has issued 17 notifications of non-compliance for breaches of conditions of Waste Licence Reg. No. 16-1. The non-compliances related to a number of issues including failure to put in place infrastructural works within the timeframes specified (leachate and landfill gas management systems), litter control and inadequate covering of waste and late submittal of proposals or reports. As indicated above a landfill gas extraction system and an enclosed flare have been installed and the licensee plans to install a utilisation plant to produce electricity for the National Grid. Leachate extraction wells have been installed and leachate is being collected and treated at Enniscorthy WWTP and the recommended PD requires the completion of additional works for the minimisation and management of leachate at the facility (**Condition 3.12.4**).

The Agency has also received approximately eight complaints in relation to the facility but none since 2000.

(6) Management and Control of Emissions to the Environment

Requirements for facility management and Environmental Management in the recommended PD in general, reflect those set out in the existing Waste Licence.

Monitoring locations and frequencies as specified in the relevant schedules of the recommended PD reflect the current monitoring regime as agreed with the Agency during the enforcement of the existing waste licence.

Requirements relating to the installation of infrastructure and the control of emissions at the facility are dealt with in the preceding paragraphs.

(7) Waste Management Plans

Wexford Co. Council are part of the South East Regional Waste Management Strategy and adopted a Waste Management Plan for County Wexford in 2001. The Waste Management Plan for Wexford states that “*the Council is aware of the need to continue to provide for future demand for municipal solid waste landfill. This may involve the extension of the existing site or development of new facilities*”. The applicant states that it plans to provide a central waste management facility for County Wexford that is unlikely to be operational before 2005 and this coupled with a lack of void space in neighbouring counties and the requirement for a disposal outlet for non-recyclable waste, requires the existing landfill at Killurin to be extended. They also state that they have provided recycling facilities in order to fulfil their commitment to reduce the volume of recyclable wastes to landfill.

A Water Quality Management Plan for the Slaney Catchment exists, but it does not make reference to any environmental effects caused by the landfill. Capping of the landfill and interception and collection of leachate should contribute to the overall objectives of the plan.

(8) Submissions

A total of 31 valid submissions were received in relation to the licence application. I have had regard to all of the submissions in making this recommendation to the Board. Below is a summary of the main concerns raised in the submissions:

1. Ownership of land identified in application

One submitter indicates that up to 28 acres of land (including woods and reedbeds) in his ownership were included in the Waste Licence application by Wexford Co. Council and despite negotiations to secure this land no agreement between the submitter and Wexford Co. Council had been reached. It is also stated that a lot of this land is permanently polluted by litter and leachate and is rendered useless to the owners for any purpose due to the activities of the dump.

Response

The applicant submitted revised drawings excluding this land from the waste licence application and the facility boundary is defined in these revised drawings.

2. Works carried out on property not in the ownership of the applicant

One submitter states that drainage works related to the operation of the landfill were carried out on property not in the ownership of the licensee without prior notification to the owners and expresses upset and concern in relation to this issue.

Response

Condition 3.1 of the PD relating to facility infrastructure includes a requirement that any works required to be carried out outside the boundary of the facility related to

requirements of the Waste Licence shall only be carried out with the prior agreement of the landowners.

3. Vertical extension of the landfill

A number of submissions express concern at the proposed raising of the final height of the landfill by up to 6 meters from 25m AOD to 31.5 m AOD and also express concern that it is unclear from the application whether the limit of the extension will be determined by the new height, by volume or by timescale and that figures for the volume of waste to be accepted outlined in the application are contradictory. Many of the submissions state that the landfill is already over full.

Response

While the vertical increase in the profile of the facility will have an additional negative impact, it is unlikely to be significant when compared to the current situation it will be short term and mitigated by the capping and planting of the side slopes of the facility and the subsequent capping and restoration of the whole facility upon cessation of waste acceptance. The maximum final height of the facility is limited to 31m AOD by **Condition 4.2**.

4. Further extension of lifetime of landfill

A number of submissions express concern regarding the further extension of the lifetime of the landfill and generally express the view that the Killurin area has tolerated the burden of a landfill in the locality for long enough. Concern is also expressed at the mention of the year 2005 and that the period time for which the landfill will continue in existence is not defined. A number of the submissions state the view that the EPA should simply refuse this licence review application. A number of submissions also express the view that Wexford Co. Council had previously given the impression that the landfill would be closed by 2003.

Response

The remaining lifespan of the landfill will be limited by the final profile of 31mAOD as specified in **Condition 4.2** of the PD.

5. Nuisances

A number of submissions raise the issue of nuisance and other adverse effects from litter, flies, odour, noise and dust arising from the activities of the facility. It is stated that despite the best efforts of the litter pickers at the site, the litter control measures are not adequate and are badly hampered by adverse weather conditions such as high winds. It is also stated that daily covering of waste and bird control measures are inadequate. One submission indicates that noise from heavy machinery at the landfill (diggers, dumpers, etc.) is audible at his residence and his farm.

Response

Condition 7 of the recommended PD sets requirements to ensure that the operation of the facility does not give rise to nuisance at the facility or in the immediate area of the facility and addresses issues including dust, noise, odour, birds and litter. **Schedule C.1** sets noise emission limits of 55 DB(A) daytime and 45DB(A) night time at noise sensitive locations.

6. Visual Impact and Tourist Amenity

A number of submissions express concerns that the increase in the height of the landfill will have a poor appearance and a negative impact on the visual amenity of the locality and affect the valleys natural beauty and that the existing landfill is an eyesore in the area. One submission states that the large hill of waste has changed the existing profile and contours of the existing landscape. It is also stated that Wexford Co. Council themselves have designated the valley in the area of the landfill as an area of special amenity. Concern is also expressed that the landfill is visible from the main Dublin to Wexford train line and that it offers a poor impression of County Wexford and that the overall tourist amenity value of the Slaney valley will be diminished. One submission states that the boating and amenity value of the River Slaney is at last being realised and that this will only be damaged by the extension of the landfill.

Response

The PD includes requirements for the capping and restoration of the side slopes of the facility and I do not consider that the increased vertical profile of the facility will have a significant additional adverse impact on the surrounding area. The PD includes requirements (**Condition 4**) for the closure, restoration and aftercare of the facility. The restoration of the facility will include planting of trees and hedgerows to blend the restored landform into the surrounding environs.

7. Leachate Management

A number of submissions state that the landfill is unlined and located in a disused sand and gravel quarry and as such there has been no real control of leachate from the landfill. Concern is expressed about contaminated runoff and leachate polluting the River Slaney. The Eastern Regional Fisheries Board (ERFB) in their submission note that leachate was detected escaping from the landfill during an inspection on 11/02/03 and state that the River Slaney is designated under the EC (Quality of Salmonid Waters) Regulations, 1978. The Board state that they consider that leachate escape from the landfill is the most significant potential impact of the landfill and welcomes the introduction of leachate interception and collection measures. The Board also notes that leachate is tankered off-site to Enniscorthy Wastewater Treatment Plant (WWTP) and expresses concern that the additional organic loading to a WWTP they consider to be at or near capacity could contribute to nutrient enrichment of the Slaney between Enniscorthy and Wexford.

Response

As referred to in Section 3 of this report, the licensee has installed infrastructure for the interception, collection and storage of leachate at the facility. **Condition 3.12** of the recommended PD sets further requirements in relation to the management of leachate at the facility and the capping of the side slopes (**Condition 4.3.2**) of the facility will act to greatly reduce the quantity of leachate generated. Concerns regarding the capacity of Enniscorthy WWTP to accommodate the treatment of leachate from the facility will be addressed by the diversion of leachate to the new Wexford Town WWTP when it comes on line.

8. Groundwater Pollution

Concerns are expressed regarding contamination of groundwater by leachate which can contain heavy metals, toxins and other hazardous pollutants and one submission indicates that two borehole on land adjacent to the landfill have been contaminated by leachate. Another submission refers to the Hydrogeological Report carried out in 1984 that indicates that dumping could give rise to pollution by leachate and that this risk would be increased during periods of high rainfall.

Response

The licensee has installed infrastructure to intercept and collect leachate and contaminated surface water at the facility. The recommended PD includes requirements for the monitoring of groundwater including all private wells within 250 meters of the facility (**Condition 8.8.1**) and **Schedule D.5** and prohibits direct discharge to groundwater (**Condition 6.4.1**).

9. Surface Water Controls

A number of submissions express concern regarding the inadequacy of surface water controls and instances of contaminated runoff onto the road and into the Slaney River and onto adjacent lands.

Response

The recommended PD includes requirements for the control of surface water at the facility and to prevent contaminated surface water and leachate discharging into surface water drains and courses (**Condition 3.14**).

10. Absence of formal notification of the ERFB

A submission from Mr. Alan McGurdy, Chief Executive Officer of the ERFB points out that the Board never received any formal notification of the proposed landfill extension at Killurin and learned about it from a third party.

Response

In accordance with Article 18(1) of the Waste Management (Licensing) Regulations, 2000, the Chief Executive of the Central Fisheries Board was notified in writing of the receipt of an application for a review of a Waste Licence for Killurin landfill on 03/05/02.

11 Threat to Natural Habitats and the Slaney River

A number of submissions express concerns that leachate contaminated surface water and groundwater is having a detrimental effect on the Slaney River and its habitat. The Wildlife Ranger in a submission expresses concern regarding the future risk to the Slaney posed by the landfill and identifies the fronting of the landfill by naturally occurring reedbeds as the only saving grace.

Response

These concerns are dealt with in the preceding paragraphs.

12 Landfill adjacent to candidate Special Area of Conservation

One submission states that the landfill is located in a Special Area of Conservation (S.A.C.) and asserts that every activity of the landfill is contrary in every detail and

every respect to the tenets and conditions of an S.A.C. and enquires why a Local Authority should be excluded from conforming to this conservation zoning when all other landowners must comply with the stringent criteria for the protection of the natural habitat.

Response

The facility is an existing facility and the conditions of the recommended PD should contribute to the achievement of the conservation objectives of the cSAC through the management and control of emissions from the facility.

13. Property Values

A number of submissions allege that the proximity of their residences to a landfill has devalued their property.

Response

Property values are outside the remit of the Agency.

14. Quality of Life

A number of submissions indicate that combined concerns regarding the damage to the environment caused by the landfill activities contributes to an overall reduction in the quality of life of the people living in the area and contribute to a general feeling of hopelessness in the community concerning the dump.

Response

The recommended PD contains a number of requirements and control measures which will ensure that the activities carried out at the facility will not cause environmental pollution.

15. Site Location – In a sand and gravel quarry

A number of submissions states concerns that a sand and gravel quarry was never a suitable location for a landfill and that any further raising of the level of waste in the site would be a mistake. One submission also states that Wexford Co. Council themselves acknowledge that gas, water, groundwater and leachate controls are problematical. Submissions also reflect the view that it was a serious error for the EPA to allow further development of the landfill with the issue of the original waste licence and that to apply for a new licence for the site is beyond belief.

Response

The landfill is an existing facility. The recommended PD sets requirements for the management and control of emissions from the facility to ensure that the activities do not significantly impair the surrounding environment. The PD also includes requirements for the capping, closure and aftercare of the facility.

16. Slope Stability and Slope steepness

Concern is expressed in a number of submissions regarding the steepness of slopes at the landfill, the stability of these slopes and the potential risk of landslide of the landfill into the Slaney.

Response

The recommended PD set requirement for the capping of the side slopes (*Condition 4.3.2.*) and the monitoring of the stability of the side slopes at the facility (*Condition 8.10*).

17. Level of disposal activity

While a number of submissions state that the Civic Waste Facility and the recycling being carried out there is a laudable development, it is stated that the percentage of waste being disposed is still unacceptably high.

Response:

The licensee has provided a Civic Waste Facility at Killurin to promote recycling and recovery of waste. However, the principal function of the Killurin facility is to provide waste disposal capacity for the county. The Co. Council also provides a network of bring centres and civic waste facilities around the county as part of the implementation of the County Waste Management Plan and towards achieving the recovery targets set out in the Government Policy “*Changing our Ways*”.

18. Health Concerns

A number of submissions refer to concerns regarding health risks related to landfills and state that some recent publications indicate that there may be a health hazard to humans living within an eight mile radius of landfills. Concern is also expressed that the landfill may contain toxic materials as it was not properly supervised for many years. The submission also states that constant monitoring of local houses highlights concerns regarding fire but does not address health issues.

Response

An August 2001 report by the Small Area Health Statistics Unit (SAHSU) in the UK presented results of epidemiological research commissioned by the Department of Health in collaboration with the National Assembly of Wales, other Departments and the Environment Agency. The research was to cover the largest possible range of landfill sites in Great Britain: it eventually included 9,565 landfills, all of which had been in operation for some or all of the period 1982-1997. The report considered the probabilities of birth defects, low birthweight, still births and certain cancers among the population living within two kilometres of a landfill site: it compared them with the probabilities in the population of those living more than two kilometres from a landfill. The report commented that it was not clear that landfills were causing these effects and that other explanations were possible – such as limitations with the data, or the possibility that the study did not completely take into account other relevant factors such as occupation or the use of medicines.

It is recognised that there are public concerns regarding the health impacts associated with waste facilities. The issue of baseline health data and adequate health information systems is a matter appropriate to the Department of Health and Children and the Health Boards.

19. Landfill Gas Management

A number of submissions note the difficulty of controlling gases in the site possibly due to difficulty with fully encircling the site or the porous nature of the site – a bed of shale rock overlaid with sand and gravel.

Response

The licensee has installed Landfill Gas (LFG) collection infrastructure and an enclosed flare at the facility and **Condition 3.13** of the recommended PD sets requirements on the management of LFG at the facility including requirements for the expansion of the LFG collection system.

20. Traffic

A number of submissions indicate that the number of heavy vehicles using the narrow roads in the vicinity of the landfill pose a major hazard to pedestrians and cyclists. One submission states that walking the narrow road beside the landfill is out of the question. Concern is also expressed that the integrity of the road infrastructure on the area continues to be degraded due to heavy traffic associated with the landfill without any improvement by the County Council despite regular promises. It is also stated that Killurin bridge is in urgent need of repair and that deterioration of the bridge may not be totally unrelated to activities at the landfill or at least traffic back and forth to it.

Response

Traffic management and the provision of adequate roads accessing the facility is a matter for Wexford County Council. Traffic awaiting access to the landfill is required to queue along the facility access road only, and not along the public road **(Condition 3.5.2)**.

(9) Recommendation

I recommend the grant of a revised licence for the carrying on of waste activities at the facility as listed and described in Part I: Activities Licensed.

In coming to this recommendation, I consider that these activities would subject to the conditions set out in the recommended Proposed Decision, comply with the requirements of Section 40(4) of the Waste Management Act of 1996.

Signed: _____
Damien Masterson, Inspector
Environmental Management and Planning

Dated: _____
1st October 2003

Appendix 1

- 1.) Drawing No. 300 – Attachment A.1 – Site Location Plan
- 2) Revised Drawing No. 202 (Attach B.1) Waste Licence Application Summary – Dwg. Ref. 1610084 Issue No. 2, received 31 May 2003.

Appendix 2

16-1 Inspector's Report – Inspector's report which accompanied the
Proposed Decision for existing Waste Licence