

MEMO

TO: Board of Directors **FROM:** Gerry Carty
CC: **DATE:** 10 November, 1999
SUBJECT : Dunmore Landfill Site - Technical Committee Report on Objection to Proposed Decision - Reg. No. 30-1

Application details

Event	Issue Date(s)	Reminder(s)	Response Date(s)
Application received	27/2/98		
Article 14(2)(b)(i)	Not applicable		
Article 14 (2) (b) (ii)	19/6/98, 25/8/98		31/8/98, 2/12/98
Article 14 (2) (a)	8/3/99		
Article 16	9/3/99		4/5/99, 20/5/99
Proposed decision	30/7/99		
Objections received	24/8/99		
Article 25(1) - Circulation of Objections	None		
Article 25(2) - Submissions on Objections	None		

Objections received

Objection by Applicant One
Objection by third party/parties None
Submission in relation to Objections None

The applicant, Kilkenny County Council, stated grounds for objection in respect of the proposed decision on Dunmore Landfill Site. A Technical Committee was established to consider the objection.

The Technical Committee

The Technical Committee comprised of:

Gerry Carty, Programme Manager (Chairperson)
Peter Carey, Inspector
Eamonn Merriman, Inspector

This is the Technical Committee's report. The objection is dealt with below.

Objections to Conditions 4.18.2, 4.18.3 and 4.19.1.

In relation to cells 1 to 7 (O'Neill's Pit), Kilkenny County Council does not consider the conditions above to be practical or economical in that O'Neill's Pit is currently ready for restoration as outlined in Attachment G.1 and G.2 of the application. Furthermore the objector considers that they are of limited environmental benefit.

Technical Committee's Evaluation

The conditions objected to are as follows:

4.18 Landfill Gas Management:

4.18.2 Within six months of the date of grant of this licence, a proposal for the collection and flaring of landfill gas shall be submitted to the Agency for its agreement.

4.18.3 Within twelve months of the date of grant of this licence, a proposal for the utilisation of landfill gas as an energy resource shall be submitted to the Agency for its agreement.

4.19 Capping

4.19.1 Within six months of the date of grant of this licence the licensee shall submit a revised proposal for final capping to the Agency for its agreement. The proposal shall provide for the following:

- (i) topsoil and subsoil depths shall be a minimum of 1m;*
- (ii) a drainage layer to allow for drainage to surface water drains or similar drainage outlet;*
- (iii) a synthetic barrier, comprising linear low density polyethylene (LLDPE), to augment the clay cap; and*
- (iv) a gas collection layer.*

The Technical Committee notes that Article 38 of the Waste Management (Licensing) Regulations, 1997 requires the Agency to, as far as is practicable, require the installation of systems to facilitate the collection and recovery or flaring of landfill gas. The Technical Committee also notes that Kilkenny County Council completed landfilling O'Neil's Pit in May 1997 and intend to restore this area by capping it with 900mm of material excavated on-site, covered by a restoration layer of subsoil and 150mm topsoil (mixed with lime treated sewage sludge and shredded tree material). It is proposed to plant trees on the proportion within the ownership of Kilkenny County Council.

Condition 4.18.2: This condition requires that a proposal should be submitted for the agreement of the Agency. The Technical Committee considers that the licensee can set forth a case in this proposal that the collection and flaring of landfill gas for cells 1 to 7 is not feasible or practical. In addition neither the costs of reworking this area nor the environmental impacts of not reworking have been detailed by the objector.

Recommendation

Condition 4.18.2: No change.

Condition 4.18.3: The Technical Committee considers that the licensee can set forth reasons in the proposal required by this condition that the use of landfill gas from O’Neill’s Pit for energy generation is not feasible or practical. The Wimpey report referred to by the objector can be submitted with this proposal.

Recommendation

Condition 4.18.3: No change.

Condition 4.19.1: The Technical Committee notes that the proposal required by Condition 4.19.1 should be submitted at the same time as the proposal on landfill gas collection and flaring required under condition 4.18.2. The Technical Committee also notes that the term “capping”, as referred to in this condition, relates to the final capping and restoration layer. The Technical Committee considers that the capping specification will depend on a number of factors including landfill gas management, leachate minimisation, proposed afteruse, etc. The Technical Committee considers that this condition should be amended to allow flexibility in approach to the capping design. The Technical Committee also considers that a timeframe should be included in the capping proposal. In addition Condition 8.2 must be revised to take into account the revisions to Condition 4.19 recommended below.

Recommendation

Condition 4.19 Capping: This condition should be amended as follows;
Condition 4.19 Capping

4.19.1 Within six months of the date of grant of this licence the licensee shall submit **a proposal, including timeframe, for final capping of all landfill cells** to the Agency for its agreement. The proposal shall provide for the following:

- a) topsoil and subsoil depth shall be a minimum of 1m;
- b) a drainage layer to allow for drainage to surface water drains or similar drainage outlet;
- c) **a barrier layer, comprising of a mineral layer and/or synthetic layer as required;** and
- d) a gas collection layer **as required.**

Condition 8.2: The first sentence of this condition should be replaced by the following;

Within six months of the date of grant of this licence, the licensee shall submit to the Agency for its agreement a Restoration and Aftercare Plan for the facility, subject to the following:

The Technical Committee note that in the objection reference is made to Kilkenny County Council not being informed formally or informally that the collection and flaring of landfill gas would be required. This is incorrect as a circular letter was issued to all local authorities on the 5th September 1997 on this issue, and guidance was contained in the Landfill Operational Practices Manual published and circulated to each local authority on the 6th August 1997.

Signed: _____
Gerry Carty, Chairperson Technical Committee