

MEMO			
TO:	Board of Directors	FROM:	Michael Henry
CC:		DATE:	25 September 2000
SUBJECT : Technical Committee Report on Objections to Proposed Decision - Reg. No. 59-1.			

Application Details	
Applicant:	Roscommon County Council
Location of Activity:	Ballaghaderreen Landfill, Aghalustia Townland, Ballaghaderreen, Co. Roscommon
Reg. No.:	59-1
Licensed Activities under Waste Management Act 1996:	Third Schedule: Classes 1, 4, 6, 7, 11, 12, 13 Fourth Schedule: Classes 2, 3, 4, 13
Proposed Decision issued on:	15/05/00
Objections received:	08/06/00; 12/06/00
Submissions on objections received:	16/08/00
Inspector:	Mr. Donal Howley

Consideration of the objections and submissions on objections

The Technical Committee (Michael Henry, Chairperson, Caoimhin Nolan and Malcolm Doak committee members) has considered all of the issues raised and this report details the Committee's comments and recommendations following the examination of the objections on September 19th and 20th 2000.

Objections and submissions on objections received

Two objections to the proposed decision were received from: (i) Roscommon County Council and (ii) Ballaghaderreen Dump Action Committee. Roscommon County Council also made a submission on the objection by Ballaghaderreen Dump Action Committee.

Objection No.1: Roscommon County Council

Basis for objection & Summary

The landfill has been in operation since 1975 and the appraisal of the existing environment indicates minimal environmental impact to date and none that cannot be further minimised by regulation, control and improved site practices. The Waste Licence application was prepared to implement improvements in a cost effective and sustainable manner particularly with respect to on site leachate treatment, gas venting and site restoration. The proposed decision imposes conditions which are unnecessary and are neither cost effective or sustainable. The proposed decision removes the opportunity for development and assessment and does not contribute to the Best Practical Environmental Option.

Technical Committee's evaluation

In reaching its decision, the Agency has had regard to many factors including waste management practices at the site, the impact the facility is having on the environment and the cost of works required. The technical committee considers that the various improvement works required under the conditions of the proposed decision (and amendments recommended in this report) are necessary to further minimise the impact of this facility on the environment.

Recommendation

No change

Specific grounds**Ground 1 (Condition 4.12.2)**

The applicant objects to the requirement for a lined leachate storage lagoon in that it does not enhance the level of leachate control provided by the leachate management proposal submitted in Attachment D of the application. It is also an unnecessary excessive expenditure.

Technical Committee's evaluation

The leachate management system proposed by the applicant in its application made reference to the managed infiltration of leachate through peat and this was not considered adequate for this facility. The collection of leachate in a lined storage lagoon is necessary to minimise the impact of leachate on groundwater and surface water in the vicinity of the landfill. The technical committee consider that the requirement for this infrastructure is essential and should remain.

Recommendation

No change

Ground 2 (Condition's 4.14)

The facility (which produces modest annual volumes of gas, maximum 3.5 million m³/year) is located at a distance from the nearest house and there is no evidence of nuisance from odour or gas. The requirement for a gas collection and flaring system is not justified and as the site is scheduled to close in 2006, it is unlikely to be subject to the mandatory requirements of Council Directive 1999/31/EC.

Technical Committee's evaluation

The installation of a gas collection and flaring system will (i) minimise the impact of landfill gas on air quality and the effect of greenhouse gas emissions (ii) minimise the risk of migration of landfill gas beyond the site perimeter (iii) reduce odours (iv) reduce the risk of fires at the facility and (v) permit the effective control of gas emissions. Irrespective of when the facility is scheduled to close and taking into account the predicted volumes of gas which are/will be produced at the site, the technical committee consider that the requirement for a gas collection and flaring system should remain.

Recommendation

No change

Ground 3 (Condition 4.15)

The applicant objects to the requirement for an impermeable membrane capping to exclude infiltration and promote run-off. Current thinking indicates that it may be a reasonable environmental option to keep waste moist and the proposals submitted in the application to

provide capping with peat and subsoil were made with this in mind. This will also promote successful planting of the final waste body.

Technical Committee's evaluation

The main objectives of a capping system are to aid in the minimisation of the infiltration of water into the waste body and subsequent leachate generation, promote surface drainage, maximise run-off and control landfill gas migration. As there is no lining in place at this facility, the technical committee consider that the installation of a capping system as specified in the proposed decision is essential. The capping system proposed by the applicant (i.e peat and subsoil) is not considered adequate. The successful planting and restoration of the facility will have to be agreed with the Agency under the Restoration and Aftercare Plan.

Recommendation

No change

Ground 4 (Condition 9.5, Schedule F, Table 5.2)

The risk to limestone groundwater from the landfill is defined by the GSI as being extremely low and there is no justification for the additional expenditure (£20,000) arising from the installation of three additional monitoring boreholes.

Technical Committee's evaluation

The proposed decision requires the installation of three additional boreholes i.e one upgradient and two downgradient of the facility and this is in line with the monitoring requirements of the Council directive on the landfilling of waste (99/31/EC). Such boreholes are necessary to establish groundwater flow and quality in the limestone aquifer. The installation cost for the boreholes is considered to be approximately half the cost quoted by the applicant and in the region of £10,000. The technical committee consider that the timeframe for the installation of the boreholes should be reduced from six months to three months as recommended below.

Recommendation

Amend Condition 9.5 as follows:
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The licensee shall within three months of the date of grant of this licence, provide for three additional groundwater monitoring boreholes. One of these boreholes shall be upgradient of the facility and the other two downgradient. The three boreholes shall be constructed for the purposes of monitoring groundwater in the limestone aquifer.
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Ground 5 (Condition's 4.15.2, 4.17 and 4.6)

Condition 4.15.2 refers to the restoration proposals received on 15th November 1999 while the Ballaghaderreen landfill proposals were submitted as part of the application on 30th September 1999. Clarification is sought on this issue.

The requirements of Condition 4.17 are not consistent with the licence application proposals for an unlined more rapidly degrading waste pile.

The applicant objects to the requirement for a site facsimile machine and it was anticipated that mobile phones would be used at this relatively remote site.

Technical Committee's evaluation

Condition 4.15.2 incorrectly referred to November 15th 1999 as the date on which the restoration proposals were received. As the restoration and aftercare proposals are required to be updated as recommended under Objection No.2 below, this condition should be amended to reflect this.

Condition 4.17 of the proposed decision requires the applicant to develop and adopt a programme for the management and effective control of surface water run-off from the facility. However, the technical committee consider that the timeframe for implementation of the works required under Condition 4.17.2 should be reduced from twelve months to within nine months of the date of grant of the licence. In addition, this condition should be amended to provide for appropriately designed surface water drains at this currently unlined facility.

The requirement for a site facsimile will ensure effective communication between the facility and the relevant authorities (e.g. EPA, Fisheries Board). The requirement for a site facsimile should remain.

Recommendation

Amend Condition 4.15.2 as follows:

Filled cells/phases shall be permanently capped to the specifications agreed with the Agency in accordance with Condition 4.15.1 within twelve months of the cells/phases having been filled to the required level. The final contour levels shall be as agreed with the Agency under Condition 8.1.

Amend Condition 4.17.2 as follows:

Within nine months of the date of grant of this licence, the licensee shall install surface water control measures for:

- (i) the prevention of leachate seepage into the surface water drains;
- (ii) the provision of appropriately designed surface water drains and
- (ii) the collection/diversion of run off arising from capped and restored areas.

Objection No.2: Environmental Management Services Ltd. on behalf of Ballaghaderreen Dump Action Committee

This objection sets out the background and the grounds and reasons for the objection (Appendix I) and a number of letters from local residents are also appended to the objection (Appendix II).

Appendix I

General grounds

The objection refers to the understanding of local people that the dump would be closed and it requests an oral hearing to allow the views of the local people to be heard. It also refers to the failure of Roscommon Co. Co. to facilitate members of the public as required by Articles 19(3) and 19(5) of the Waste Management (Licensing) Regulations, 1997. The application contains a number of inaccurate statements and it is incorrect to state that the landfill is remote or that little or no environmental damage has been done. A number of photographs are also included which highlight the height of the landfill, its visibility, the absence of cover, the presence of rats, birds and noxious odours, the evidence of apparent leachate contamination and there was no evidence of recycling or waste recovery activities.

Technical Committee's evaluation

Articles 19(3) and 19(5) of the Waste Management Licensing Regulations 1997, makes provision for all documents relating to the waste licence application to be made available for public inspection by the local authority. The technical committee considers that the various issues with regard to information access are a matter for the local authority and Ballaghaderreen Dump Action Committee (see also Submission from Roscommon County Council on Objection by Environmental Management Services Ltd. on behalf of Ballaghaderreen Dump Action Committee). The applicant will be required to make all information concerning the environmental performance of this facility available to members of the public in the programme to be agreed under Condition 2.7.1 of the proposed decision. The Agency has made a decision not to hold an Oral Hearing on this application and this has been communicated to this objector.

Recommendation

No change

Specific grounds

Ground 1 (Lack of compliance with European and National Waste Management Policy)

The proposal to extend the life of the landfill at this unsuitable location and the absence of any recycling facilities is at variance with EU and Irish regulations and policies. The requirement to engage in any meaningful levels of recycling activity is very weak and Condition 5.19 requires the applicant to do no more than provide a report 'examining provisions' for the separation, composting, recovery and recycling of waste. No procedures exist for the encouragement or enforcement of waste management methods other than landfilling and it is of concern that the targets for the separation, composting, recovery and recycling of waste will not be implemented.

Technical Committee's evaluation

The Agency has had regard to all relevant policies, regulations, and legislation in making its decision on this application. The continued operation of the landfill can only occur with regard to the many detailed and specific technical conditions already set out in the proposed decision (as amended by the recommendations of this report) and this will ensure compliance with the above statutory provisions. The technical committee considers that the timeframe for receiving proposals on waste recovery should be reduced from nine months to six months in order that waste recovery procedures are agreed with the Agency as soon as possible. Condition 5.19 should be amended to reflect this. The applicant is also required to establish a civic waste facility at the site within six months of the date of grant of the licence and this will encourage collection of recyclable wastes.

Recommendation

Amend Condition 5.19 as follows:

5.19 Recovery

Within six months of the date of grant of this licence, a report examining provisions for the following:

- 5.19.1 the separation of recyclable materials from the waste;
- 5.19.2 the use of inert waste as cover/restoration material at the facility.
- 5.19.3 the achievement of the recovery targets for construction and demolition waste
- 5.19.4 as specified in the Government publication "Changing Our Ways"; the recovery of metal waste and white goods including the de-gassing of CFC's from refrigerators;
- 5.19.5 the recovery of commercial waste, including cardboard;
- 5.19.6 the recovery of sludges; and
- 5.19.7 composting of biodegradable or green waste at the facility having regard to good practice and sustainability.

shall be submitted to the Agency for its agreement.

Ground 2 (Difficulty of compliance with EU Landfill Directive)

Even under the proposed licence conditions, it will be very difficult for the licensee to operate the landfill within the requirements of the Directive. Siting and containment requirements cannot be met and the location of the landfill on a bog close to an important angling river (flows towards public water supply) overlying a limestone aquifer are reasons for discontinuing further deposition of wastes and for remediation of the site.

Technical Committee's evaluation

The technical committee consider that landfilling at this site should be limited to disposal in areas where waste has been historically been disposed. Any waste which is deposited outside these areas should be in lined cells in accordance with Condition 4.16 of the proposed decision. Condition 5.8 should be amended to reflect this while the restoration and aftercare plan should be agreed with the Agency under Condition 8.1 of the proposed decision (see also Ground 1 of Appendix II below).

Compliance with the conditions of the proposed decision and the amendments recommended in this report, particularly with regard to capping, leachate management and surface water control measures will result in a significant reduction in uncontrolled leachate discharges from the site with a corresponding ongoing and continual improvement in both surface and groundwater quality.

In addition, the technical committee consider that the timeframe for installation of the leachate management system required under Condition 4.13.1 should be reduced from twelve months to within nine months of the date of grant of the licence.

Recommendation

Amend Condition 4.13.1 as follows:

Within nine months of the date of grant of this licence, the licensee shall install a leachate management system at the facility. The system shall provide for the abstraction/collection of leachate from the waste and its treatment either at the facility or at a suitable treatment works.

Amend Condition 5.8 as follows:

No waste shall be deposited in areas outside where waste is currently deposited except in cells which are lined in accordance with Condition 4.16.1.

Ground 3 (Proximity of Dwellings)

The map included in the waste licence application was inaccurate and a more accurate map is attached showing five additional houses and one house built in the last 12 months.

Technical Committee's evaluation

The technical committee note the map submitted as part of the objection and are satisfied that the assessments made in determining this application will not change significantly as a result of this information.

Recommendation

No change

Ground 4 (Proximity of Agriculture and Use of Local Streams for Stock Watering)

It is of concern to local farmers that livestock in the area are exposed to leachate entering the river via the bog-drains and further landfilling would increase the risk of animal ill health.

Technical Committee's evaluation

It is considered that the infrastructural works necessary for this facility together with compliance with the conditions of the licence will result in a significant improvement in the quality of groundwater and surface water in the vicinity of the site thereby ensuring the protection of these resources as sources of drinking water.

Recommendation

No change

Ground 5 (Existing and Potential Effects of Groundwater)

It is apparent that the layer of peat under the waste mass provides little protection for the underlying aquifer present in the limestone under the bog and one well to the east of the landfill probably intercepts groundwater moving towards the river.

Technical Committee's evaluation

The underlying limestone aquifer is protected from landfill leachate contamination by virtue of the relatively deep overlying clay till subsoils underneath the site. There are no known groundwater abstractions in the vicinity of the site. In addition, the installation of monitoring boreholes in the limestone aquifer will allow continual assessment of the quality of groundwater in this aquifer.

Recommendation

No change

Ground 6 (Unsuitability of Road Network)

There has been a major increase in traffic volume over the past 2-3 years and there appear to be no adequate proposals to improve or upgrade the road to deal with the increased traffic.

Technical Committee's evaluation

Given that no EIS was required for this activity (<25,000tpa) the issue of traffic on the local access road is a matter for the roads authority.

Recommendation

No change

Ground 7 (Potential Contamination of River Lung and Effects on Angling)

It would appear that there is prima facie evidence of contamination from the landfill entering the River Lung and causing damage to angling.

Technical Committee's evaluation

The objector did not provide sufficient evidence to show that the landfill is impacting on angling in the River Lung. As stated above, the improvements required at this facility will further reduce the impact of this facility on the receiving environment.

Recommendation

No change

Ground 8 (Proximity of Turf Harvesting)

The landfill is impacting on turf harvesting in the area.

Technical Committee's evaluation

The technical committee consider that the level of control of potential nuisance from the facility should be increased in order to further minimise the impact this facility is having on the surrounding environment. In particular, the controls on vermin should be increased as recommended below while the timeframe for submission of the assessment of the bird control measures should be amended from six months to within three months of date of grant of the licence.

Recommendation

Amend Condition 6.7 as follows:

Within three months from the date of grant of this licence the licensee shall submit to the Agency for its agreement, an assessment of the effectiveness of the bird control measures at the facility.

This assessment shall include, where required:

- (a) proposals for additional bird control measures;
- (b) method for assessing the effectiveness of such additional measures; and
- (c) timescales for the implementation of such measures.

Amend Condition 6.9 as follows:

The licensee shall apply the insect and rodent control measures outlined in Attachment F.9 of the application. Notwithstanding these measures, and within three months of date of grant of this licence, the licensee shall submit to the Agency for its agreement a programme for the control

and eradication of insect and rodents infestations at the facility. The programme should include as a minimum the following:

- (a) details on the insecticides(s) and rodenticides(s) to be used;
- (b) operator training; and
- (c) mode and frequency of application and measures to contain sprays at the facility boundary.

Include new Condition 6.11 as follows:

A written record shall be kept at the facility of the programme for the control and eradication of vermin and fly infestations at the facility. These records shall include as a minimum the following:

- the date and time during which spraying of insecticide is carried out;
- contractor details;
- contractor logs and site inspection reports;
- details of the rodenticide(s) and insecticide(s) used;
- operator training details;
- details of any infestations;
- mode, frequency, location and quantity of application; and,
- measures to contain sprays within the facility boundary.

Ground 9 (Fires)

Fires have taken place at the facility and these fires were often of long duration (e.g. 2 weeks).

Technical Committee's evaluation

Condition 4.18.1 of the proposed decision requires the applicant to provide fire control measures at the facility while the applicant is also required to submit an assessment of the fire control and fire water retention provisions at the site. In addition, fires should be treated as an emergency at the facility (Condition 10.5).

Recommendation

No change

Ground 10 (Golf Club)

The 'quality' of golf available at the local golf club would be affected by the increased traffic and odours may be experienced there. Scavenging birds may also damage the golf course.

Technical Committee's evaluation

The issue of traffic is dealt with under Ground 6 above while potential nuisances are controlled by Condition 6 of the proposed decision as amended by the recommendations of this report.

Recommendation

No change

Appendix II – Letter from local residents

These letters (twenty in total) raise a number of issues relevant to the Ballaghaderreen Landfill facility, and the technical committee have given consideration to these issues. The following is a summary of the points raised.

Ground 1 (View of the Facility and Deposited Waste left Uncovered)

Local residents living nearby have a clear view of the facility and as the site expands, the more offensive their view becomes. Uncovered waste is particularly unsightly.

Technical Committee's evaluation

The technical committee note the residents concerns in relation to the visual impact of the landfill. In view of the restrictions imposed on landfilling under Ground 2 of Appendix I above, a revised restoration and aftercare plan will have to be agreed with the Agency and the maximum height of the landfill should be limited to 85mOD (as proposed in the application). In addition, the technical committee consider that a proposal for screening around the boundary of the facility should be submitted to the Agency for agreement. The provision of such screening will further reduce the visual impact which this facility will have on the surrounding environment.

The applicant is required to cover the waste on a daily basis under the terms of the proposed decision. The technical committee consider that Condition 5.12 should be amended to specify the minimum depth of daily cover required. In addition, covering of the whole landfill is required within three months of date of grant of the licence (Condition 5.13). The technical committee consider that Condition 5.13 should specify that the minimum depth of such intermediate cover should be 300mm as recommended in the Agency's manual on Landfill Operational Practices.

Recommendation

Include new Condition 4.21 as follows:

Within six months of the date of grant of this licence, the licensee shall install an effective perimeter visual screen around the facility.

Include the following in Schedule E: Specified Engineering Works:

Installation of perimeter screen around facility

Amend Condition 5.12 as follows:

The working face of the operational cell shall, at the end of each day, be covered with material suitable to minimise any nuisances occurring. Unless otherwise agreed with the Agency, daily cover should be 150mm in depth.

Amend Condition 5.13 as follows:

Any cover material at any location within the facility which is eroded, washed off or otherwise removed shall be replaced by the end of the working day. Within three months of the date of grant of this licence, cover material of at least 300mm shall be placed across the whole landfill so that no waste other than cover material or material suitable for specified engineering works is exposed.

Amend Condition 8.1 as follows:

Within six months of date of grant of this licence, the licensee shall submit a revised Restoration and Aftercare Plan for the facility which shall be based on the plan submitted as part of Attachment G1. This shall include the following:

- (i) a planting and phasing programme
- (ii) a revised contour map taking into account the restrictions conditioned in this licence
- (iii) any other matter notified in writing by the Agency.

The licensee shall have regard to the guidance published in the Agency's Landfill Manual: *Landfill Restoration and Aftercare*.

Amend Condition 8.2 as follows:

Notwithstanding Condition 8.1, the final maximum height of the facility shall not exceed 85m OD.

Ground 2 (Assurances given by Roscommon County Council)

Following a picket of the facility in 1984 by local residents, it is alleged that assurances were given by the County Council that the facility would be closed within the next couple of years.

Technical Committee's evaluation

This matter is outside the scope of this report.

Recommendation

No change

Ground 3 (Fires)

In the past fires have been a problem at the facility and one particular fire in 1997 lasted for two weeks. Fires have made it difficult to breath, have hindered gardening, and have caused discomfort through the necessity to close windows.

Technical Committee's evaluation

The issue of fire is dealt with under Ground 9 of Appendix 1 of this objection.

Recommendation

No change

Ground 4 (Vermin, including rats, flies and birds)

Rats have been an enormous problem, with rodents inhabiting the area in epidemic proportions. Concern is expressed on the health effects of these vermin, and in particular the risk to humans and pets of contracting Weil's disease. Flies associated with the facility have caused distress to local residents and livestock, and the health implications of these are also raised. Residents complain about the need to close windows, employ fly-killing practices and to enforce strict hygiene practices at their homes. Birds attracted to the landfill are a nuisance in the area due to their droppings, the damage they cause to wrapped silage bales and their habit of carrying litter from the facility.

Technical Committee's evaluation

Potential nuisances are controlled by Condition 6 of the proposed decision as amended by the recommendations of this report.

Recommendation

No change

Ground 5 (Litter)

Litter and waste spreading from the facility to adjacent land is unsightly and poses a risk to grazing animals, and also encourages the spread of vermin such as rats. Litter also emanates from vehicles travelling to the site.

Technical Committee's evaluation

The technical committee consider that the proposed decision should be amended to provide for the installation and maintenance of litter fencing around the perimeter of the active tipping area and this will further prevent the transfer of litter to surrounding lands. Condition 6.3.1 should be amended to reflect this.

Recommendation

Amend Condition 6.3.1 as follows:

All the measures and infrastructure described in Attachment F5 shall be applied to control litter at the facility. Within three months of the date of grant of this licence, litter fencing shall be installed and maintained around the perimeter of the active tipping area. The netting shall meet the guidance given in the Agency's Manual on "Landfill Operational Practices" and shall be kept tidy and litter trapped in the netting shall be removed as soon as practicable.

Ground 6 (Traffic)

The increase in traffic on the road network in the area due to the landfill is highlighted. The roads leading to the facility are narrow and unsuitable for such traffic.

Technical Committee's evaluation

The issue of traffic is dealt with under Ground 6 of Appendix 1 of this objection.

Recommendation

No change

Ground 7 (Health Effects)

Concern is expressed that the facility is causing medical difficulties with the local population. Problems such as vomiting and diarrhoea, irritation of eyes, breathing difficulties are highlighted, and it is alluded that people "drink local water from the dump area. A study of the health effects of industrial landfill sites which was published in the Lancet medical journal in August 1998 is also quoted.

Technical Committee's evaluation

As stated above, there are no known groundwater abstractions in the vicinity of the site. The waste types to be accepted for disposal at the Ballaghaderreen landfill are non-hazardous wastes. The study referred to here related to landfills which handled hazardous chemical waste. The technical committee consider that compliance with the conditions attached to the proposed decision (and those changes recommended in this report) with regard to leachate, surface water and landfill gas (amongst others) together with the control of potential nuisances will minimise emissions from the facility and therefore any impact which this facility will have on human health or the local environment.

Recommendation

No change

Ground 8 (Surface Water Contamination)

Concern is expressed that the landfill is causing pollution of the River Lung, and also that this may affect the water quality of Lough Gara which is the local drinking water supply.

Technical Committee's evaluation

This issue is dealt with under Ground 2 of Appendix 1 of this objection.

Recommendation

No change

Ground 9 (Odour)

Obnoxious smells emanate from the facility and cause considerable discomfort to residents and people working or taking part in leisure activities in the area.

Technical Committee's evaluation

Compliance with the conditions of the proposed decision together with the changes recommended in this report will ensure odours from this facility will be significantly reduced. In addition, the technical committee consider that, in order that procedures for the handling of sludges are initiated as soon as possible at the facility, the timeframe for submission of such procedures should be reduced from nine months to within three months of the date of grant of the licence.

Recommendation

Amend Condition 5.14.3 as follows:

Within three months of the date of grant of this licence, the licensee shall submit to the Agency for its agreement, handling procedures for sludges.

Ground 10 (Shooting Activity)

Due to the amount of vermin associated with the facility, the landfill and its environs are used for shooting practice by some people. This results in noise disturbance to local residents.

Technical Committee's evaluation

It is beyond the scope of this report to recommend specific controls on shooting activity outside the boundary of the facility, however such activity should be significantly reduced following the implementation of adequate daily cover and vermin control measures. Security measures to prevent unauthorised access to the facility are provided for under Conditions 4.3 and 5.9.

Recommendation

No change

Ground 11 (Waste Types Accepted at the Facility)

Concern is expressed over the types of waste accepted at the landfill which include medical waste, asbestos and dead animals. Another letter details the potential effects of various compounds (e.g. zinc, polychlorinated byphenols) arising from some wastes (e.g. beverage cans, tyres, batteries, oil, and paints) on fish populations.

Technical Committee's evaluation

The waste types accepted at the facility are controlled under Condition 5.1 and 5.2, and these prevent the licensee from accepting hazardous waste, liquid waste, asbestos waste, animal excrement, animal blood and paints amongst others. However, the technical committee consider that Condition 5.1 should be amended to include a prohibition on medical waste being accepted at the landfill. The implementation of Conditions 5.3 and 5.4 of the PD will ensure that adequate waste acceptance procedures are implemented and this will ensure that only appropriate waste types are accepted at the facility.

Recommendation

Amend Condition 5.1 as follows:

No hazardous waste, asbestos waste, liquid waste, industrial non-hazardous sludges or untreated sludges shall be disposed of at the facility. Other wastes whose disposal is prohibited at the facility are; septic tank waste, silt & dredgings, animal excrement (including paunch contents), animal blood, dried paints, dried varnish & dried lacquer, latex & rubber solutions and medical waste.

Submission from Roscommon County Council on Objection by Environmental Management Services Ltd. on behalf of Ballaghaderreen Dump Action Committee

The grounds of this submission are set out under two headings Administrative Matters and Technical Matters.

Administrative Matters

The applicant makes reference to having no record of verbal assurances being given to local residents in 1994 in relation to the closing of the landfill and that they have complied at all times with the Statutory Notice requirements of the Waste regulations. It refers to a request by a Co.

Co. member for the proposed decision and application form and it states that at all times the application and associated correspondence were available for public inspection.

Technical Committee's evaluation

The issues raised here are dealt with under General Grounds (Appendix 1) of Objection No. 2 above.

Recommendation

No change

Technical Matters

The applicant recognises that it is unacceptable for the facility to continue operating as at present and the operational proposals provided in the waste licence application are designed to remediate those aspects of the waste disposal operation which give rise to the objections. The objections raised by the locals have been divided into 7 headings which have all been addressed in the waste licence application:

- *Vermin and flies: Attachment F9 of the application identifies spraying, baiting, pest control and liaising with the Environmental Health Officers in addition to compaction and covering.*
- *Birds: Compaction, covering and the use of appropriate bird scaring techniques (if required) are identified in Attachment F2 of the application.*
- *Odour and Smell: The measures proposed include the compaction and covering of waste and the provision of vent stacks and odour suppressing sprays if necessary (Attachment F6).*
- *Traffic: No significant increase in traffic is predicted and the initiation of formal waste acceptance procedures will result in a more predictable pattern of road usage. Road cleansing and wheelwash facilities will be provided at the site (Attachment E2 and F7).*
- *Visual Impact and Litter: Litter control measures proposed include covering and compaction and, if necessary, litter picking and mobile litter fencing. Present visual impacts are described in Attachment C7.*
- *Impact on surrounding peat and agricultural lands: The ecological survey identifies little or no impact on the surrounding environment. The detriment arising from the presence of flies, birds, vermin and odour will be significantly reduced if not eliminated by the operational procedures proposed in the application.*
- *River Contamination of River Lung: Water sampling and analysis submitted in the application show no evidence of contamination of the River Lung by leachate. The leachate management system proposed in the application will eliminate contamination of the boundary ditches*

Other issues

- *Existing and potential effects on groundwater: The applicant points out that at no stage is the peat invoked as protection for the underlying aquifer and protection is provided by the boulder clay underneath the peat. This is totally consistent with GSI recommendations.*
- *Proximity of Dwellings and Remoteness of Site: The noise assessment undertaken as part of the application reflected the nearest sensitive locations to the landfill and none of the additional dwellings identified on a map submitted with the objection are closer than those identified in the application. The site is 400m from the nearest residence and this is greater than the minimum distance of 250m which is generally regarded as acceptable.*
- *Fire: The risk of fire will be substantially reduced through the operational procedures proposed in the application and water hydrants, fire extinguishers and formal emergency procedures will be provided.*

- *Golf club: The golf club is not located off the present site access road and the impact of traffic on the 'quality of golfing' is difficult to imagine. The impact of odours and birds will be effectively eliminated by operational procedures.*
- *Factually Incorrect Allegations: The applicant states that no evidence is presented to substantiate the statement that (i) inadequate information was provided in the application or (ii) leachate is likely to be contaminating the River Lung.*

Summary

The infrastructural and operational procedures proposed in the licence application effectively remediates those aspects of the present facility to which objection is raised. The objection submitted by Ballaghaderreen Dump Action Committee can be viewed as a legitimate objection to the present operation of the facility, it is not a sustainable objection to the proper operation of the proposed licensed landfill.

Technical Committee's evaluation

The issues raised here are dealt with under Objection's No.1 and No. 2 above.

Recommendation

No change

Signed:

Michael Henry
Technical Committee Chairperson