

## INSPECTORS REPORT

WASTE LICENCE REGISTER NUMBER 60-1

### (1) Summary:

Whiteriver is an existing landfill facility operated by Louth County Council in a rural part of the County. This landfill was developed as a clay lined containment landfill in 1983. This application is for the continued disposal of household & commercial waste, sewage sludge and industrial non-hazardous solid waste. The facility currently accepts 20,000 tonnes of waste per annum and the remaining capacity is in the region of 120,000 tonnes (160,000 tonnes from January 1998). The *Draft Waste Management Plan for the North East Region, November 1999* recommends that this facility should be capable of accommodating Louth's waste.

<b>Name of Applicant</b>	Louth County Council
<b>Facility Name (s)</b>	Whiteriver Landfill
<b>Quantity of Waste (tpa)</b>	20,000 tpa
<b>Environmental Impact Statement Required</b>	No
<b>Number of Submissions Received</b>	Four
<b>INSPECTOR'S RECOMMENDATION</b>	The Proposed Decision as submitted to the Board be approved.

### (2) Activity Summary

The facility opened in 1983. The applicant has indicated that the closure of the facility is scheduled for around 2006. The landfill will then be restored to agricultural land.

The location is acceptable from a groundwater protection viewpoint based on the guidance in the DoE/EPA/GSI publication "*Groundwater Protection responses for Landfills*". The facility has been developed in three phases and a fourth phase is planned. In Phases 1, 2 and 3 the low permeability subsoils in the area have been engineered to form a barrier for leachate containment and management. Leachate is collected and pumped to a lined lagoon for on-site pre-treatment before it is tankered to Ardee Sewage Treatment Works.

The PD requires the applicant to upgrade the facility and install an active landfill gas management system and impermeable capping. All new cells have to be lined with a flexible membrane liner in addition to the clay layer currently used. The Proposed Decision (PD) contains conditions to guard against environmental pollution and nuisances during the operation of the landfill. There are no recovery or civic waste facilities.

It is recommended that all the activities for which the applicant has applied for a waste licence, be licensed subject to the conditions contained in the attached Proposed Decision.

### **(3) Facility Location**

**Appendix 1 contains a site location map and a plan showing the layout of the facility.**

The facility is situated in a rural area of County Louth in the townland of Whiteriver. The facility is almost centrally located between three towns - Ardee (7km to the north west), Dunleer (5km to the north east) and Collon (4km to the south). The facility is 1km north of the regional road linking Dunleer and Collon.

The facility area is 10 ha. The eastern and northern boundaries of the facility are adjoined by a third class road, and the western and southern boundaries by agricultural land. The surrounding landscape is mainly agricultural with scattered farmsteads and individual dwellings. Mellifont Abbey Woods (pNHA) lies approximately 800m to the south-west. The applicant has stated that there are six occupied dwellings within a 500m radius of the facility. The closest properties to the landfill are located along the third class road adjoining the eastern boundary - one farm dwelling along this road is approximately 100m from the boundary of the facility.

### **(4) Waste Types and Quantities**

The applicant has indicated that the total capacity of the facility is 342,130 tonnes. Up to the end of 1997 the amount of waste deposited was 182,130 tonnes (*Article 14 reply received on the 22/2/99*). The applicant has applied to deposit a maximum of 20,000 tonnes of waste per annum and this limit is included in *Condition 5.5*. A total of 160,000 tonnes can be deposited over the remaining life time of the facility (calculated from January 1998).

Waste recovery is not carried out at the facility. The applicant initially applied for Class 6 of the Third Schedule (recovery of components used for pollution abatement). However, when asked to correct and clarify the relevant classes of activity applied for, and provide the outstanding recovery fee of £5,000 (*Article 8 & 14 Notices dated the 21/1/99*), the applicant replied that the temporary storage of waste oils was discontinued. A revised newspaper notice did not include Third Schedule activities. Condition 5.1.1 does however allow the applicant to accept waste oil for recovery and the infrastructure for this can be agreed under Specified Engineering Works (Condition

4.13). In order to promote the recovery of waste Condition 5.1 prohibits certain recyclable/recoverable wastes from being disposed at the landfill.

## **(5) Facility Design**

- **Infrastructure;**

The facility is secured by a combination of a chain link fence and 2m high palisade fencing. In places hedging reinforces the fencing and screens the facility. Additional landscaping and screening is required under Condition 4.20. Condition 4.3 requires the maintenance of the existing security arrangements.

The main infrastructure within the facility includes 6m wide access roads, reception building, car park, lined leachate lagoon, septic tank and wheelwash. Infrastructure required to be installed includes a weighbridge (Condition 4.8), waste inspection and quarantine area (Condition 4.7) and surface water management infrastructure (Condition 4.18). There are no civic waste facilities. No fuel is stored on site and landfill machinery is refuelled by a fuel tanker.

- **Liner system and Leachate Management;**

The facility has been engineered on a cellular basis with cells being constructed and lined using the in-situ low permeability clay. Phase 3 is the current operational phase and this phase is divided into two clay lined cells (Cells 1 & 2). Cell 1 is currently being used for waste disposal. Cell 2 is already clay lined and prepared for use. Under Condition 4.14 all new cells will have to be lined with a flexible membrane liner – this includes Cell 2 in Phase 3. (Note that Cell 2, Phase 3 was used for the disposal of some asbestos cement sheeting - refer to submission No. 2, Issue 10 for details).

The landfill incorporates leachate management and includes the following: minimisation of active cell size, progressive capping, surface water cut-off and leachate collection pumps and chambers. The collected leachate is pumped to a HDPE lined leachate aeration lagoon for storage and pre-treatment. The pre-treated leachate is discharged to a concrete holding tank from where it is collected by tanker and transported to Ardee STW for secondary treatment.

The amount of leachate generated is estimated to be in the order of 17,500m<sup>3</sup> per annum. After restoration and capping this should be reduced to roughly a quarter of this volume. Analysis of leachate revealed a variable composition but overall the composition was consistent with typical municipal waste leachates with high ammonia, conductivity, BOD and COD levels.

Condition 9.1 requires leachate monitoring including monitoring of leachate levels in the cells. Condition 4.15 requires the applicant to maintain the existing leachate management system. The PD requires the applicant to submit details for agreement of a leachate collection system for new cells under Specified Engineering Works.

Records must be kept of all leachate tankered off site (Condition 3.12). Condition 4.17 specifies the landfill cap that needs to be installed in order to reduce rainwater ingress and therefore reduce the amount of leachate being generated.

- **Landfill Gas Management;**

Active landfill gas extraction or flaring is not carried out at the facility. Landfill gas is presently allowed to vent to atmosphere from passive venting towers installed in the waste mass. Maximum gas production is estimated to occur one year after closure and is estimated at 4.5 million m<sup>3</sup>. Condition 4.16 requires the installation of an active flaring system. Emission limits for the flarestack are set by Condition 7.1.

- **Capping System and slope stability ;**

Condition 4.17 specifies a capping system for the facility. The system specified is based on that required by the Landfill Directive. Slope stability monitoring is required to be carried out under Condition 9.19.

<b>(6) Facility Operation/Management</b>
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- **Waste Acceptance / Handling Procedures**

Condition 5 restricts the waste types to be disposed to household, commercial and industrial non-hazardous. This Condition also prohibits certain recoverable waste from being disposed (e.g. construction and demolition wastes) and places restriction on the disposal of recyclable/recoverable wastes (e.g. treated sewage sludge, glass, metal and green waste).

Condition 5.3.3 requires the applicant to review the existing waste acceptance procedures. There is currently no weighbridge at the facility. Condition 4.8 requires a weigh-bridge to be installed within nine months of date of grant of the licence. All waste entering and leaving the facility must be recorded (Condition 3.10).

- **Nuisance Control**

Potential nuisances are controlled by Condition 6. Vermin will be controlled by appropriate baiting as specified in the application and provided for in Conditions 6.11 and 6.12. A bird control programme must be put in place under Condition 6.9 - this includes the use of a falcon if the measures in place are not being effective. Condition 6.1 requires that weekly inspections are carried out and recorded. Condition 5.11 requires daily covering of waste. Condition 6.10 requires that a wheel-wash be used to prevent the tracking of any materials onto the public road. Scavenging is not allowed at the facility and is prohibited by Condition 5.8. Condition 6.3 provides for litter screens around the active tipping area.

- **Hours for Waste Acceptance**

The operating hours proposed are those applied for by the applicant: Monday to Friday 8.30am to 16.00pm and Saturdays 9.00am to 13.00pm (Condition 5.9). Any changes in these hours are subject to the written agreement of the Agency.

## **(7) Restoration and Aftercare**

The final profile of the facility, and its restoration and aftercare is controlled by Condition 8 Restoration and Aftercare. The applicant indicates that waste disposal activities are scheduled to reach final restoration and capping levels by approximately 2006. The final profile of the facility is covered by Condition 8.2. The applicant proposes to restore the landfill facility to agricultural grazing lands. Restoration of the facility must be undertaken progressively (Condition 4.17 and 8.8).

## **(8) Hydrogeology**

Geology : The geology which underlies the landfill consists of greysandstone with minor muds and shales. These rocks are overlain by a thick overburden of till which typically comprises boulder clay with non-extensive minor sand and gravel bands. With one exception all the ten boreholes drilled on-site have depths of clay in excess of 6m. Depths in excess of 31m have been proven in one borehole during the site investigations with seven boreholes in excess of 10 m. The till / boulder clay has a low effective permeability with variable head permeability test results ranging from  $4.2 \times 10^{-8}$  m/s at 1.2m to  $1.2 \times 10^{-9}$  m/s at 9.6m. The sand and gravel bands encountered are at various depths ranging from 6 to 14m: their thickness is generally 1 to 2m. The permeability of the sand and gravel bands was typically  $10^{-4}$  m/s.

Hydrogeology : The groundwater resource is classified as a low permeability poor aquifer, which may yield enough for a domestic supply. However, the gravel bands possibly represent a locally important minor sand / gravel aquifer. Because of the low permeability of the clay runoff is promoted. Groundwater flow is in a north easterly direction. One domestic well is located 100m upgradient of the landfill (BH2). The applicant has stated that there are no private wells within a distance of 0.5 km downgradient of the landfill.

Groundwater Monitoring : Groundwater monitoring has been carried out at the facility since the early 1980's. Several of the older boreholes show evidence of contamination. Ammonia concentrations are particularly elevated at three boreholes – one upgradient and two downgradient (annual mean ammonia concentration ranging from 0.08 to 17.11 mg/l ). The applicant has stated (*Article 16 reply received 14/2/00*) that the construction of these older boreholes rendered them vulnerable to contamination from surface runoff and in particular from the ingress of slurry. Monitoring was discontinued at these older boreholes in 1998. Condition 9.4 requires the applicant to repair or replace two of the older downgradient boreholes (BH5 & BHC).

Borehole number 7 - which is downgradient - has been monitored since 1984. Some exceedances of the drinking water standards for ammonia and potassium have been recorded on occasions along with one isolated exceedance for cadmium (List I Groundwater Directive). Four new boreholes were installed at the facility during 1997

and 1998. Isolated exceedances of the drinking water standards for ammonia and some metals were recorded at a downgradient borehole (BH6). The results are broadly similar to the results for the upgradient and intermediate boreholes. Iron and manganese is naturally elevated in the area. List I/II organic compounds were not detected in upgradient or downgradient groundwater samples. Monitoring of the private well upgradient of the facility indicates that water quality is generally satisfactory for the parameters analysed, however, isolated elevated ammonia concentrations have been recorded.

Future Groundwater Monitoring : Groundwater monitoring is required by Condition 9.1. A data management system for the assessment and comparison of monitoring data is required under Condition 9.22. Results of the monitoring of the private supply BH2 must be provided to the well owners under Condition 9.5. Schedule F specifies the groundwater analysis required. A decision can be taken by the Agency under Condition 9.12 to alter the sampling frequency dependant upon future monitoring results.

#### **(9) Emissions to Air**

Emissions to air include landfill gas and dust. In addition there is potential in the future for emissions of the combustion products of landfill gas.

Landfill gas and the combustion products of landfill gas : Landfill gas piezometers are established along three boundaries of the landfill. Condition 9.2 requires the piezometers (x4) to be extended to cover the southern perimeter of the landfill. Slightly elevated methane levels have been recorded on isolated occasions from four piezometers along the eastern boundary. Migration of landfill gas from the facility (as well as associated odours) will be controlled through Condition 4.16 which requires the installation of a landfill gas collection and flaring system. Condition 7.1 and 7.4 sets emission limits for landfill gas detected in buildings. Condition 7.4 sets trigger levels for landfill gas detected outside the body of the waste mass. Landfill gas monitoring requirements are set out in Condition 9.1.

Dust : Dust monitoring was carried out at the western and eastern boundaries (DG1 and GG2). Elevated dust levels recorded at the eastern boundary were attributable to placement of cover material. Condition 6.7 requires that in dry weather water must be used for dust abatement. Dust monitoring requirements are established under Condition 9.1.

#### **(10) Noise**

The main sources of noise at the facility are site machinery, vehicles depositing waste and pumps used for leachate management. Noise monitoring was carried out at the three nearest noise sensitive locations during normal working hours at which site noise was only occasionally discernible at one location. Noise prediction calculations indicate that noise levels at the nearest sensitive location will not be intrusive and will be less

than EPA guidelines. Noise emission limits are established by Condition 7.1. Noise monitoring of the facility is required by Condition 9.1.

#### **(11) Emissions to Sewer**

There are no emissions to sewer.

#### **(12) Emissions to Surface Water**

The facility is located in the sub-catchment of the White River, a tributary of the River Dee. During site development works a small stream which flowed through the facility was culverted and diverted around the northern and eastern perimeter. The White River is located only 450m to the southern boundary of the facility, however, the perimeter stream does not join the White River for a distance of 1.8km downstream of the facility due to a watershed divide. The White River is used as a public water supply source. The trench dug for the culverted stream was lined to provide a cut-off for shallow groundwater seepage. Surface water runoff from the site access roads and overburden stockpile are discharged to the perimeter streams.

The water quality monitoring results indicate no deterioration in water quality downstream of the landfill. The results show elevated concentrations of ammonia, BOD and COD upstream attributed to an agricultural source off-site. Dealing with this source of contamination is the responsibility of the local authority.

Condition 9.1 requires surface water monitoring. Condition 4.18 requires a surface water management plan to be implemented on the facility to ensure that only clean surface water is discharged to the stream. This includes the installation of measures to control silt runoff and a contingency system to contain and control any spillage on site.

#### **(13) Other Significant Environmental Impacts of the Development**

None.

#### **(14) Waste Management, Air Quality and Water Quality Plans**

Consideration was given to the *Draft Waste Management Plan for the North East Region* (November 1999). This draft plan recommends that Whiteriver Landfill provide interim capacity for County Louth and that this facility should be capable of accommodating Louth's waste. Louth County Councils draft waste management plans were also considered, namely (1) *Waste Management Plan 1987 - Draft Report* and (2) *Special Waste Management Plan 1992 - Draft Report*.

#### **(15) Submissions/Complaints**

**Four submissions were received in relation to the application. An overview and summary of all submissions received in relation to the waste licence application is provided below. This includes the issues raised and how these issues are dealt with in the PD.**

**1. Submission received from the Eastern Regional Fisheries Board on the 16th July 1999**

*The Eastern Regional Fisheries Board state that they have no objection to the application provided that all mitigation measures as outlined in the application are adhered to. They note that the landfill is located in the catchment of the White River which is a tributary of the River Dee a valuable salmonid fishery in the Eastern Region.*

**Response :** Mitigation measures for protection of the White River are incorporated into Condition 4. Extensive monitoring of surface water is specified in Schedule F. Under Condition 3.3 the Eastern Regional Fisheries Board must be notified of any incident which relates to discharges to surface waters.

**2. Submission received from Philipstown Residents Committee on the 3rd August 1999**

Covering Letter, Background and Conclusions

*The detailed submission received from the Philipstown Residents Committee covers 18 issues and includes seven attachments. The issues raised in the submission and attachments are considered below. The residents outline the High Court challenge they made to the siting of the landfill. They state that the High Court ruling allowed the landfill development to proceed providing that Louth County Council follow the recommendations in a report prepared by the council consultants Aspinwall & Co. At the recommendation of the High Court a monitoring committee was established and this committee has been meeting regularly over the last 18 years. The committee express their dissatisfaction with the councils management of the facility and welcome independent enforcement by the EPA. They express concern about any expansion or time extension to the facility, which they say that council have denied at a recent meeting. The committee requested a meeting with the EPA to discuss the submission.*

**Response:** The High Court ruling and the Aspinwall report were included as part of the waste licence application. The draft Waste Management Plan for the North East Region recommends that Whiteriver be capable of accommodating Louth's waste. I understand that the possibility of expanding the Whiteriver Landfill is one option being considered. The size and life span of the existing facility is limited by Conditions 1.2, 5.5 and 8.2.

Issue 1: Inadequate Covering of Landfill Site.

*The committee claim that the council have not kept to the High Court ruling (Attachment I : High Court Ruling) and the recommendations in the Aspinwall report (Attachment II : Aspinwall Report). They enclose photographs to demonstrate the poor covering of waste over the years (Attachment III : Photographic evidence showing lack of top soil coverage at Whiteriver Landfill Site). They also say that the low permeability subsoil on site is not suitable for cover material.*

**Response :** The photographs do show inadequate covering of waste. A stockpile of cover must be kept on site (Condition 4.17.4). Condition 4.17 specifies daily cover requirements.



Condition 5.11 requires that the working face be covered daily. Condition 5.12 requires that all areas other than the working face are covered so that no waste is exposed.

Issue 2 : Water Readings / Sample Results

*The committee claim that they do not always receive copies of the monitoring results. They state that the results they do receive need to be better explained and should include a comparison with relevant standards and baseline conditions. Copies of recent results received from the Council were attached as Attachment IV: Recent Sample of Water Readings. They request that the EPA should interpret these results and requested a meeting to discuss trends.*

**Response :** Under Condition 3.5 all results submitted to the Agency must be accompanied by an interpretation. All results will be available to the public either at the Agency offices or at the site office (Condition 3.9). Condition 9.5 requires that the results of monitoring of private water supplies be forwarded to the water supply user. Condition 9.22 requires the applicant to develop a data management system. A summary of the monitoring carried out must also be included in the Annual Environmental Report.

Issue 3: Security

*The committee considers that security has been a problem with scavenging occurring at the facility when the site is closed. They say the only way to combat this is to have permanent security and daily covering of waste.*

**Response :** The site must be made secure to trespassers under Condition 4.3. Condition 5.8 prohibits scavenging at the facility. Adhering to the requirement for daily covering of waste should minimise the likelihood of scavenging.

Issue 4: Control of Insects

*The monitoring committee outline their concerns about flies and associated health implications especially during the summer month. They request the EPA to determine whether the landfill is posing an unnecessary risk.*

**Response :** Condition 6.8 requires the council to operate the landfill so that flies do not give rise to nuisance at the facility or the immediate area of the facility. Many of the Conditions of the PD are designed to monitor, control and prevent nuisances occurring. In the case of flies this includes the daily covering of waste (Condition 5.11), weekly inspections (Condition 6.1) and fly control measures (Condition 6.11 & 6.12).

Issue 5: Control of Rodents

*The committee claim that there is a high population of rats in the area and outline their concerns.*

**Response :** Conditions 6 provides for the control of environmental nuisances. The daily covering of waste will minimise the attraction for rodents. Baiting and weekly inspections are required under Condition 6.11 and Condition 6.1 respectively.

Issue 6: Suitability of the machinery used for compacting / covering the waste

*The committee claim that proper covering of the waste cannot be carried out by the compactor because of the height and slope of the working face. They say that a high-mac should be used to cover the sides of the working face. They state that the method of filling the cells is in breach of the High Court ruling and the Aspinwall Report.*

**Response :** The size and height of the working face is limited by Condition 5.10. This restriction should allow for proper daily covering of the wastes.

Issue 7: Non Adherence to the High Court Ruling

*The committee outline reasons why they consider that the Aspinwall guidelines are not being followed including inadequate covering, dumping of septic tank effluent, animals and asbestos cement and failure to comply with cell construction and landscape the facility as required.*

**Response :** The EPA was not a party to the High Court ruling. Whether the past management and operation of the landfill followed the Aspinwall guidelines is essentially a matter between the monitoring committee, the council and if necessary the High Court. The PD includes conditions to deal with the concerns mentioned and requires the council to operate the landfill without causing environmental pollution.

Issue 8 : Environmental Impact of Landfill

*The monitoring committee states that the landfill impacts the environment in the following ways :*

- (i) unbearable smells particularly during the summer,*
- (ii) waste and litter being found in neighbouring farmers fields which is both unsightly, unhygienic and a danger to animals that eat it. They say this waste is mainly scattered by the high number of birds and include photographs showing the high bird numbers (Attachment V : Photographic evidence showing bird population in vicinity of Whiteriver Landfill Site),*
- (iii) affect on surrounding trees and shrubbery since a number of dead silver dale trees are noted. The committee request the EPA to investigate this and include a photograph showing the dead tree (Attachment VI : Photograph No. 3 from the Tennyson Report which was commissioned to report on the illegal dumping of Asbestos at Whiteriver Landfill).*

**Response :** Condition 5.11 requires waste to be covered daily to control odours, birds numbers and litter blowing off site. Control of landfill gas odours is covered by Condition 4.16 which requires a landfill gas management system to be installed. Condition 6.3 is designed to control litter at the facility and requires the installation of litter netting around the working cell and the daily removal of loose litter. Birds are dealt with through Condition 6.9. Condition 4.20 requires the applicant to improve the landscaping of the facility including the planting of indigenous trees. Any incidents which indicate environmental pollution (this includes indicators of landfill gas migration for example dying vegetation) must be reported to the Agency as an incident under Condition 3.1 and an investigation carried out to determine the causes.

Issue 9: Septic Tank Effluent

*The committee outline their concerns about the disposal of septic tank solids and effluent from tankers and state that their own consultants report that the disposal of liquid waste was not allowed for in the original infiltration calculation and should be terminated (Attachment VI : Tennyson Report which was commissioned to report on the illegal dumping of Asbestos at Whiteriver Landfill).*

**Response :** Condition 5.1 specifies that no liquid waste shall be disposed of at the facility. Only treated sewage sludge can be disposed of and the disposal of sludge has to cease after twenty four months from the date of grant of the licence (Condition 5.1.2 and 5.2).

Issue 10: Dumping of Hazardous Materials

*The committee outline concerns about the disposal of hazardous waste at the facility such as (i) paint containers (ii) dead animals and (iii) asbestos / concrete based products. In relation to paint containers their concern is pollution of groundwater and ask for an investigation to determine whether any pollution has occurred. In relation to asbestos the concerns relate to 200 tonnes of asbestos cement from the roof of the Tegral Building Products Factory in Drogheda which was disposed at the landfill. The residents claim that the disposal of the asbestos cement breaches the High Court ruling and are particularly concerned with the councils handling of the issue. They say that the council have agreed not to dump asbestos cement at the facility and refer to the minutes of a meeting with the council (Attachment VII : Minutes of Meeting between the Philipstown Residents Committee & Louth County Council on the 29/6/98 after the illegal dumping of asbestos at Whiteriver Landfill Site). The committee also refer to an attached report which stated that the asbestos waste should be covered by at least 2m of soil (Attachment VI : Tennyson Report which was commissioned to report on the illegal dumping of Asbestos at Whiteriver Landfill). The committee demand that the area where the waste was deposited be encased in concrete. They also say that if they returned to the High Court they would win their case.*

**Response :** Condition 5.1 specifies that no hazardous waste or animal waste / offal shall be disposed of at the facility. Asbestos cement is not classified as hazardous waste in the Hazardous Waste List (Asbestos based construction materials 170105). Landfilling is a recognised method for the management of asbestos cement waste. Asbestos cement was one of the waste types that the council applied for in their application. The disposal of asbestos cement waste is allowed at the facility providing that the Agency is notified prior to disposal (Condition 5.1.5). It is for the applicant to decide whether to accept this type of waste in the future. The asbestos cement already deposited at the facility cannot be excavated or disturbed under Condition 5.16. No asbestos waste shall be within 2.5m of the final surface levels (Condition 8.6). List I/II solvents were not detected in groundwater monitoring carried out as part of the application. Schedule F details groundwater monitoring requirements which includes List I/II solvents.

Issue 11: Vents not constructed 3 metres over ground level to ensure safe and effective evacuation of methane gas.

*The committee states that the existing vents are too low above the ground and should be at least 3m to allow for safe venting of landfill gas.*

**Response :** Condition 4.16 requires the installation of an active landfill gas management system which will replace the existing passive venting system. Pending installation of the active gas management system the passive venting must follow the guidance in the Landfill Manual on “*Landfill Operational Practices*”. Landfill gas monitoring is required under Schedule F. Emission limits for landfill gas are specified in Schedule G.

Issue 12 Cells not constructed as recommended by the Aspinwall Report .i.e. pillar system

*The committee claim that the council are not following the recommendations in the Aspinwall Report with regards to the construction of cells and the covering of waste. They say that the cells should be designed such that only the front of the working face is exposed and not the two side as is now the case.*

**Response :** Condition 5.10 specifies the there should only be one working face at any one time.

Issue 13 Cells which were full were not graded off as recommended in the Aspinwall Report

*The committee claim that the cells are not suitably covered, graded and returned to their original condition as recommended by the Aspinwall Report.*

**Response :** Condition 8 requires the licensee to ensure that the standards for the restoration of the landfill are in compliance with the Landfill Directive. Completed areas must be capped and restored within the times specified in Conditions 4.17.3 and 8.8.

*Issue 14 Inadequate controls for determining the annual intake of waste (i.e. no weighbridge)*  
*The committee are concerned that there is no weighbridge to accurately record the annual waste intake and claim that the log kept at the site suggests that the intake is way in excess of the agreed yearly intake.*

**Response :** Condition 4.8 requires the installation of a weighbridge. Records of the amount of waste deposited at the facility must be kept under Condition 3.10. Condition 5.5 limits the annual waste intake at the facility to 20,000 tonnes per annum.

*Issue 15 Inadequate controls for the logging of waste consignments*

*The committee say that inspection of incoming waste is inadequate.*

**Response :** Condition 5.3 requires the council to put in place waste inspection procedures to ensure that only suitable waste is accepted at the facility. Random inspections of the incoming waste must be carried out under Condition 5.4.

*Issue 16 Landfill used for waste generated in the Louth region only, with exceptions of Dundalk and Drogheda. Louth Co*

*The committee claim that accepting waste from outside of County Louth is in breach of the High Court Ruling. They refer to photographic evidence in Attachment II.*

**Response :** This is a matter between the High Court and the interested parties. The amount of waste to be accepted at the facility is limited in the PD to 20,000 tonnes per annum.

*Issue 17: Non attendance and disruption by Louth Co. Council Engineers at Monitoring Committee Meetings*

*The submission states that the monitoring committee was established on the recommendation of the High Court. They claim that interest from the county councillors and the council officials was non-existent for a number of years but the committee was restored due to concerns about the dumping of asbestos cement.*

**Response :** This is a matter between the High Court and the interested parties. Condition 2.7.1 requires the licensee to prepare a communication programme and this must have regard to the existing arrangements and the established monitoring committee.

*Issue 18: Indiscriminate dumping along roadside and hedgerows*

*The committee are concerned about illegal dumping of waste along the roadside and hedgerows. A facility to combat this problem was provided in the past but was abused and the service withdrawn. The residents demand a solution to this ongoing problem.*

**Response :** Condition 6.5 requires the council to erect appropriate notices around the facility to deter the illegal dumping of waste. Condition 6.3 specifies the litter control measures to be used at the facility. Any waste that is illegally dumped outside the facility must be promptly removed as specified in Condition 6.4.

### **3. Submission received from the National Parks and Monuments Services of Duchas on the 12th August 1999**

*The National Parks and Monument Service note that the facility is located an adequate distance from local recorded monuments. They however recommend that the licensee employs an archaeologist to monitor all top soil striping during any further groundwork's at the facility. If archaeological material is found then works have to stop and in consultation with Duchas a decision taken on how best to proceed.*

**Response :** The archaeological requirements recommended by Duchas have been written into the PD as Condition 9.15.

**4. Submission received from the Countryside Protection Unit of Duchas on the 9th March 2000**

*The Countryside Protection Unit of Duchas have no objections to the granting of a waste licence.*

**Response :** The submission is noted.

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

Dated: \_\_\_\_\_

Brendan Wall  
Inspector, Environmental Management & Planning

**APPENDIX 1**

**SITE LOCATION & LAYOUT DRAWINGS**