



**OFFICE OF
LICENSING &
GUIDANCE**

INSPECTORS REPORT ON A LICENCE APPLICATION

To:	DIRECTOR(S)	
From:	MALCOLM DOAK	- LICENSING UNIT
Date:	4 MARCH 2005	
RE:	APPLICATION FOR A WASTE LICENCE REVIEW FROM WATERFORD COUNTY COUNCIL, LICENCE REGISTER 32-2, DUNGARVAN LANDFILL.	

Application Details

Type of facility:	Integrated Waste Management Facility and Closed Landfill
Classes of Activity (P = principal activity):	3 rd Schedule: 4 and 13 4 th Schedule: 2, 3, 4, 9, 11 and 13 (P) <i>Note: The review will result in Class 1 3rd Schedule being deleted, and the addition of Class 9 to the 4th Schedule.</i>
Classes of Activity Refused	None
Quantity of waste managed per annum:	12,000 tonnes* <i>*This quantity does not include topsoil/subsoil for landfill restoration</i>
Classes of Waste:	Municipal waste, green waste, hotel kitchen waste, separated recyclables, household hazardous waste, and WEEE. Construction & Demolition Waste and Inert Waste for Landfill Restoration.
Location of facility:	Ballynamuck Middle, Dungarvan
Licence application received:	29/04/2004
Third Party submissions:	0
EIS Required:	No
Article 14 Notices sent:	17/06/2004
Article 14 compliance date:	05/08/2004
Site Inspections:	27/05/2004 (M. Doak) 11/02/2005 (M.Doak & O. Cunningham [OEE])

1. Facility

This report relates to an application received from Waterford Council for a review of the existing waste licence at Dungarvan Landfill (Reg. No. 32-1 - issued 29 November 2002).

In summary, the primary reasons for the licence review are:

- To focus the principal waste activities on-site to 4th Schedule activities at the front end of the facility by authorising the composting facility and Civic Waste Facility [CWF] (**Condition 3.15**), and ensure their proper operation as required by Section 40(4) of the WMAs;
- To authorise the transfer station, but require the licensee to upgrade the facility to BAT as required by Section 40(4)(c) of the WMAs ;
- To specify and re-confirm the required restoration works at the closed landfill as per Licence 32-1, including the installation of landfill gas management infrastructure and capping as originally required by May 2004 and the complete restoration of landfill by 31 December 2005. It is noted that the main focus of Licence 32-1 issued in November 2002 was to regulate the restoration and aftercare of the landfill (the landfill ceased accepting waste for disposal on 30 June 2003), but the local authority have yet to carry out the restoration and aftercare work required;
- To re-schedule waste tonnages caused by the cessation of municipal waste disposal to landfill, and enable the disposal/recovery tonnages envisaged by the applicant at the composting unit. Overall this will cause a reduction of waste handling at the facility from c.20,000T/annum to c. 12,000T/annum;

Drawing No DLRA 01 Site Plan provides an overview of the entire landfill and CWF facility, with insets provided for the 'front-end' of the facility.

It is noted that the applicant did not show proper regard to the licensing procedures and requirements of the EPA, and has difficulty in meeting compliance with the existing waste licence: The review application (15 pages long) received on 29 April 2004 applied for the transfer station and composting unit only; it did not address the closed landfill and the obligatory restoration measures required in Licence 32-1. As a result, the Agency required the applicant on 14 July 2004 to re-publish the application notification and submit further information in order to rectify this matter. Further the Agency recently received¹ (6 January 2005) new drawings for the facility without any cover letter or note to describe the rationale for sending us such, or proper address. The facility has a significant level of non-compliance with the existing waste licence (as discussed in Section 10 of this report).

2. Operational Description

The applicant has applied for one new class of activity: Fourth Schedule Class 9, necessary to facilitate anticipated recovery of landfill gas by flaring/electricity generation but has not presented any documentation on the matter other than saying it will submit SEW documents. The applicant proposes to delete the principle activity of landfilling (Class 1 Third Schedule) to be replaced by Class 13 (Third Schedule) – storage prior to disposal.

¹ The letter was addressed as:
Arlene
c/o EPA, PO Box 3000, Johnstown Castle Estate, Wexford.

It is proposed to handle c.8,000T mixed municipal waste at the transfer station with additional allowances for separates such as paper, glass, organic kitchen waste, plastics of c. 2,000T at the CWF receptacles. The applicant has also applied to handle up to 400T of household hazardous wastes and WEEE at the CWF, replacing the 1000T/annum of 'metals'. Furthermore the composting plant aims to handle 1,120T of garden waste by 2008.

The new waste volumes and streams are acceptable but as per requirements of Condition 1.2 and 3.1, as tabled below:

Waste Type	Maximum (tonnes per annum)	Maximum (tonnes per annum) recommended
	WL 32-1	32-2 Review
Municipal Waste	15,347	10,000
Hazardous Municipal Waste (separately collected fractions): 20 01 21* 20 01 23* 20 01 33* 20 01 35* 20 01 36 20 01 37*	-	400
Inert Waste	3,000	See Note 1
Metals including white goods	1,000	-
Garden Waste	-	1,120
Total	19,347	11,520

Note 1: Volume of inert waste for recovery and landfill restoration works cannot exceed 20,000T during lifetime of the licence. Inert waste accepted at the facility shall comply with the standards established in the EU Decision (2003/33/EC).

Standard Conditions apply for the operation of the CWF but with drainage upgrades required (see Section 4.3). My recommendations specifically regarding the existing Transfer Station, Composting Facility, and closed Landfill are as follows:

(i) Transfer Station Facility

The licensee proposes to accept 8,000T/annum of waste for disposal/transfer at a relatively small building (dimensions 10m x 35m), constructed in 2003 without Agency agreement. The applicant states in Section 2 of the application that the building will be a holding facility for the daily waste arising from two refuse collection vehicles which operate to the west of the county. The waste is then loaded onto a trailer for transport to Tramore Landfill 42km east (Waste Licence Reg. No. 75-1). Waterford Co Co specifies the building contains a full air conditioning system to prevent odour build up, has a leachate collection system and rodent control with floor washing.

Despite the fact that the Agency has not agreed to the use of this building the OEE has observed members of the public off-loading waste from car-trailers directly into the building without supervision. Furthermore the OEE have also noted on three occasions during 2004 that the waste in the building can be left to deteriorate for days as the two pictures below show (6 July 2004):



My inspection of the building on 11 February 2005 at 12 noon demonstrates the building is in reality no more than an intermediate holding bay with limited ancillary items and poor leachate management, all of which do not mirror the standard described by Waterford. Approximately 20m³ of waste was noted to lie on the floor. Present are the following items:

- Air handling unit of three overhead pipes connected to three extractor fans which vent any air to the outside at the rear of the building approximately 3m above ground level;
- Inadequate leachate/contaminated run-off collection system consisting of one small floor gully trap which discharges untreated leachate into a large 40m² unlined holding pond and adjacent estuary to the rear of the building. Leakage out the front door also occurs onto made ground which drains to the same holding pond;
- One rodent control trap in operation;
- An inspection of computer records shows the transfer station takes in three trucks per day and conveys approximately 70 tonnes of waste on a daily basis to Tramore Landfill via two trailer trips.

The draft EU BREF Waste Treatment document and the EPA draft waste treatment BAT Note determine the following is BAT for a waste transfer facility which handles and stores solid wastes. The BAT items are listed and checked for those that occur in Dungarvan:

- Ensure that the storage area drainage infrastructure can contain all possible contaminated run-off;
- Use a dedicated area for quarantine of unacceptable wastes;
- Provide regular inspection and maintenance of storage areas including pavements and bunds;
- Use local exhaust ventilation to control odour and dust;
- Where contaminated run-off is collected in a sump, its regular emptying and cleaning is required;
- Regular site inspections to check for vermin and insects. Written records of all inspections and any actions taken should be monitored.

- ☒ All biodegradable waste to be removed from the facility within 48 hours of its arrival (BAT EPA).
- ☒ For discharges to foul sewer, foul water/final effluent quality must meet standards set by the receiving sewage treatment works to adequately treat the wastewaters it receives.

Considering the lack of details supplied by the licensee at application stage for the Transfer station, the lack of BAT items which should be implemented as above, and its unauthorised operation since mid 2003, I recommend that the Transfer building and practices be upgraded immediately to meet BAT for the local setting (Condition 3.16 and Schedule E) and that the handling of all wastes shall cease at the building until the BAT upgrades have been completed to the satisfaction of the Agency (Condition 3.1). Furthermore the acceptance of waste for disposal direct from the public is not authorised (Condition 8.8.9).

(ii) Composting Facility

Limited details concerning the in-vessel composting facility are set out on pages 6 to 11 of the application. In summary the composting system, as inspected on 11 February 2005, is currently unauthorised, is located to the rear of the CWF, is third party managed and operated on a 'pilot basis', and consists of the following infrastructure and system:

- open sided shed of dimensions 8m x 8m and adjacent concrete slab for the holding of raw materials;
- raw materials of canteen waste stored in 240L wheelie bins in a shed, and green waste stored on the concrete slab;
- wood shredder to size the green waste raw materials;
- auger waste blender/integral bin lifter (where the two waste types are blended);
- two enclosed in-vessel units for 14 day maturation;
- (aerated static pile) a suite of concrete curing bunkers of dimensions 10m x 35m with aeration slots and associated biofilter;
- a trommel screen for final compost screening; and,
- a testing regime for compost quality/maturity prior to sale.

The applicant proposes to accept a maximum of 280T/annum of catering kitchen waste and 1,120T/annum of garden waste. The facility currently accepts 260T/annum of catering waste and 1,030T/annum of garden waste which is totally unauthorised.

I recommend that the composting facility be licensed to accept 1,000 tonnes per annum of biowaste for composting on a trial basis, since the details provided in the application are poor, no SEW documents or monitoring returns exist as the activity is not a licensed activity, and the process is predominantly occurring out of doors. The expansion of the composting system via higher throughputs may require indoor composting and other system checks (bio-filters etc) in order to meet BAT.

Under Condition 8.10 of the RD, the licensee shall operate the trial scheme for a 12 month period. Following satisfactory monitoring and quarterly reporting of operating procedures and controls for the trial composting scheme, the OEE may approve an increased throughput. The Schedules of the RD specify the composting process control and monitoring, including monitoring of the biofilters and bio-aerosols. The requirement of Regulation (EC) No. 1774/2002 with regard to animal by-products will apply to the kitchen wastes (kitchen wastes are a Category 3 Animal By-Product).

(iii) Closed Landfill

Landfill gas management

Dungarven Landfill is ranked 27th in the EPER² list of Irish Landfills which emit methane³ without recovery, having registered emissions of 750,000 m³ in 2001. I noted considerable odours of landfill gas on the east side on 11 February. The existing licence 32-1 required the installation of an active gas collection and flaring system by 29th May 2004. The application documentation for review did not refer to any landfill gas management infrastructure and so this licence reverts to the same requirements of existing licence 32-1. Therefore Condition 3.18.1 takes immediate effect.

Leachate and trade effluent management

The existing licence 32-1 required the installation of a leachate collection (toe) drain on all sides of the landfill footprint by 29th November 2003, critical to the control/prevention of pollution of the adjacent river and NHA. The application documentation for review did not refer to any leachate management infrastructure. The OEE note a leachate sump for the landfill has been installed at the facility without the agreement of the Agency. This sump and associated leachate pond were inspected by me on 11 February; leachate breakout was noted to colour the riverbank on the northern side of the landfill mound. Neither structures are BAT and have no Agency permission. They do not serve any purpose other than two holes in the ground with the potential to pollute underlying groundwater and the adjacent river. This licence reverts to the same requirements of existing licence 32-1 for the toe drain and other leachate infrastructure with slight amendments to manage trade effluent from the front of site operations. Therefore **Condition 3.19** takes immediate effect.

Any surface water must pass through an ISO standard interceptor **Condition 3.8**.

Capping

The existing licence 32-1 required the final capping etc by 31 December 2005 of maximum height 15mOD. The application documentation for review did not refer to any capping proposals and so this licence **Condition 10.1** reverts to the same requirements of existing licence 32-1, but provides for Agency agreement.

Hours

The operational hours etc of the landfill and CWF (**Condition 1.7**) reverts to the same requirements of existing licence 32-1.

3. Use of Resources

No details supplied.

² European Pollutant Emission Register, which was established by a Commission Decision of 17 July 2000. The EPER Decision is based on Article 15(3) of Council Directive 96/61/EC concerning integrated pollution prevention and control.

³ Methane is 20-30 times more damaging (per molecule) than carbon dioxide to the global climate due to its greenhouse effect. Combustion by landfill gas flare will convert methane to carbon dioxide.

4. Emissions

The following concentrates on those operations or aspects of the facility that may have a significant impact on the environment:

4.1 Air

Emissions to air will primarily consist of landfill gas, landfill gas combustion products, dust, odours etc. Landfill gas management has been discussed under Section 2 above. Odour issues at the facility are no longer expected to create a nuisance, as landfilling of waste and sewage sludge licensed under 32-1 has ceased. Schedule B of the RD imposes acceptable limits on air emissions, while Schedule C requires monitoring of landfill gas, dust, odour, noise and emissions from the composting process.

4.2 Emissions to Sewer

Not applicable

4.3 Emissions to Surface Waters & Groundwater

As described in Inspector's report 32-1 and required in Licence 32-1. **Condition 3.8 and 3.19** of this revised licence specify new management infrastructure to prevent/abate pollution of the adjacent River Colligan to the immediate north

5. Visual Impact

As per existing licence, the final profile of the facility shall not exceed a maximum height of 15mOD (Malin Head) **Condition 10.2**.

6. Cultural Heritage, Habitats & Protected Species

The Colligan River is tidal in the vicinity of the landfill and flows into Dungarvan Harbour downstream of the site. The site adjoins the Natural Heritage Area (NHA) for Dungarvan Harbour and is immediately upstream of the Special Protection Area for Dungarvan Harbour.

7. Waste Management Plans

In the Waterford County Council Waste Management Plan (1997-2002) it is stated that the "Dungarvan landfill is practically at the end of its useful life".

8. Environmental Impact Statement

An EIS was not required for the purposes of this licence review.

9. Compliance with Directives/Regulations

Landfill Directive (LFD)

Technical requirements arising out of the LFD were discussed in Section 2 above.

The RD also takes account of the requirements of the IPPC Directive, the Groundwater Directive and the EU Animal By-Products Regulations (in relation to composting).

10. Compliance Record

The existing licence (32-1) has a considerable non-compliance history regarding the:

- Non installation of landfill gas management infrastructure;
- Non installation of leachate management infrastructure;
- Exceedences of landfill gas concentration limits;
- Leachate contamination of surface water;
- The unauthorised construction and operation of a transfer station and composting unit.

The construction and operation of a transfer station and composting unit since July 2003 *are not authorised under the current Waste Licence 32-1* as notified by Agency letter to Waterford County Council on 15 July 2003 and other dates in 2004, and as recently as 6 October 2004 (see Appendix 1).

Among other things, the leachate management system was required to be installed and commissioned within twelve months (29 November 2003) of the date of grant of the existing licence in order to prevent on going pollution in 2002 of the groundwater and Colligan River. Further the proposed continued disposal of waste at the facility, ongoing pollution in 2002, and issue of licence would have contravened Section 40(4) of the Waste Management Act, 1996, unless the licence specified the leachate management infrastructural works. The attached Agency OEE Site Inspection of 6 October 2004, notes that the required leachate collection drain has not been installed around the entire perimeter of the landfill.

The above, and non-compliances recorded in the various site inspection reports have had a bearing on my recommended determination and as a result the Office of Environmental Enforcement Site Inspections dated 28 January 2004; 6 July 2004; and 6 October 2004.

11. Submissions

There were no submissions made in relation to this application.

12. Charges

The current charge for the existing licence (34-1) is £13,660 (€17,345) set on 20th April 2001. This recommended decision has set charges at €16,948 as proposed by the OEE for 2005.

13. Recommendation

Having considered all the documentation, particulars and information submitted with this application, and Agency Site Inspections, I recommend that a revised licence be granted for Classes 4 and 13 of the Third Schedule and Classes 2, 3, 4, 9, 11 and 13 of the Fourth Schedule, subject to the conditions, and in particular the requirements specified for the Transfer Building, tonnage limit for composting and leachate management works, as set out in the attached RD and for the reasons as drafted.

Signed

Malcolm Doak

SITE INSPECTION REPORT

Mr Denis McCarthy

Register Number

32-1

Procedural Note

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2003.

Dungarvan Waste Disposal Site,
Ballynamuck Middle,
Dungarvan,
Co. Waterford.

**Inspection Reference
Number (IRN):**

(Reg32-
1)SI05OC

APPENDIX 1

Waterford County Council
Director of Services,
Planning, Environment & Emergency Services
Civic Offices
Dungarvan
Co. Waterford

Date of Inspection:

06/10/2004

Date of Issue: 26/10/2004

Inspectors:

Olivia
Cunningham

Announced

Unannounced

F.A.O. Mr. David Whealan

This Site Inspection Report details the Agency's findings following an inspection of Dungarvan Landfill (Waste Licence Reg. # 32-1) on 06/10/2004.

NOTIFICATION OF NON-COMPLIANCE

The Agency is extremely concerned at the level of non compliance at this facility. Failure to comply with the requirements specified in this notification of non-compliance will leave the Agency no option but to consider legal action in regard to this matter.

The Agency may/will separately consider such additional legal actions as may be necessary to ensure compliance with the Licence requirements.

In view of the above you are required to submit a schedule to the Agency within 10 working days of receipt of this Report detailing how the non-compliances and observations specified therein are to be rectified. Please quote the above Inspection Reference Number in any future correspondence in relation to this Report. If you have any further queries please contact Ms. Olivia Cunningham at 053 60600

1. SITE INSPECTION AND ASSESSMENT

The Site Inspection commenced at 10.45am and the following were in attendance:

Representing Waterford County Council

Mr. David Whelan	Facility Manager
Ms Grainne Whelan	Deputy Facility Manager
Mr. Bill O'Keefe	Caretaker
Mr. John Govern	Deputy Caretaker

Representing the Environmental Protection Agency:

Ms. Olivia Cunningham	Inspector
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A tour of the site was conducted, special attention was paid to the civic amenity area, the green waste acceptance area, the in-vessel composting units, the transfer station, monitoring points and the old landfilled area.

Interview

The following representatives were interviewed during the Inspection:

Name	Position	Issue
Mr. Bill O'Keefe	Caretaker	Waste Records
Mr. David Whelan	Facility Manager	Various Site Issues
Ms Grainne Whelan	Deputy Facility Manager	Various Site Issues

Documentation

The following documentation was requested for review:

Record	Condition No.	Comment
Leachate Removal Records	10.5	Not Available- See Inspection Findings
Waste Records	10.2	See Inspection t Findings
Copy of Licence	10.1	Available
Nuisance Inspections	8.13.1 and 10.3(d)	Not Available- See Inspection Findings
Landfill Gas Monitoring	8.1	Not Available- See Inspection Findings
Training Records	10.3(b)	Not Available- See Inspection Findings
Borehole Construction Logs	-	Not Available
Waste Acceptance Procedures	5.1.1	Available

General Comment

A number of significant repeated non-compliances have been noted by the Agency. A number of major infrastructural works are outstanding. The unlicensed activities of composting and the operation of a transfer station continues at the facility. The Agency notes that these activities are the subject of a review application. The licensee should be aware that the compliance history of the current license (32-1) will be taken into account when making a decision on the review application. The Agency is concerned at the lack of/or inadequate response to the corrective actions specified in previous Site Inspection Reports (SI03OC and SI04OC).

The licensee was briefed on the Agency's reporting procedures and was advised that a Site Inspection Report would be issued.

2. INSPECTION FINDINGS

Inspection Non-Compliances

The site inspection process is a random sample on a particular day of a facility's compliance with some of its licence conditions. Where a non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

The licensee was found to be in non-compliance with the requirements of the Licence in respect of the following on the day of the Inspection (Schedule and Condition numbers refer to the Licence):

- 1. Composting:** As noted previously (SI03OC and SI04OC) Waterford County Council have commenced the operation of a pilot composting facility (accepting food and green waste) without the agreement of the Agency. A stockpile of green waste was observed at the green waste acceptance area. The 'Organamix' mobile unit was operational at the time of inspection. A strong earthy compost odour was detected in the vicinity of the green waste storage area and at the facility entrance. Three stockpiles of compost material were observed on the maturation slab, slight inert contamination of the compost was evident (i.e. small amounts of plastic). I was informed by Ms. Whelan that as yet none of the mature compost has been removed off-site, the licensee is awaiting the results of compost analysis prior to removal off-

site.

This is a non-compliance with Condition 1.1 of the Waste Licence.

Corrective Action Required

The licensee should note that composting is not a licensed activity under Waste Licence Re. No. 32-1 and is therefore not authorised under the terms of Waste Licence Reg. No. 32-1. It is noted that the licensee has applied for a review of the Waste Licence to include composting and that this application is under consideration.

2. **Waste Transfer Station:** As noted previously (SI03OC and SI04OC) a transfer station is in operation at the facility without the agreement of the Agency. Waste was observed on the floor of the transfer building. A strong localised stale waste odour was detected in this area. A gully was observed on the floor of the transfer building. Mr. Whelan informed me that the gully drains to the leachate chamber.

This is a non-compliance with Condition 1.1 and 5.8.1 of the Waste Licence.

Corrective Action Required

The licensee should note that the operation of a transfer station is not a licensed activity under Waste Licence Re. No. 32-1 and is therefore not authorised under the terms of Waste Licence Reg. No. 32-1. It is noted that the licensee has applied for a review of the Waste Licence to include the transfer station and that this application is under consideration.

3. **Landfill Gas Management:** No infrastructure for the active collection and flaring of gas has been installed at the facility. This was due to be commissioned and installed by 29th May 2004. As noted previously a very strong odour of landfill gas was detected on top of the landfilled area close to L4 during the course of the inspection.

Prior to the operation of an active flare at the facility, the licensee is required to operate passive landfill gas management as per Agency's Manual on '*Landfill Operational Practices*' at the facility. There is no passive landfill gas management at the facility.

This is a non-compliance with Conditions 3.14.1.1 and 3.14.3 of the Waste Licence.

Corrective Action Required

Immediately submit a proposal and detailed specified engineering works, for the agreement by the Agency, for the landfill gas infrastructure. Work on the installation of the active landfill gas abstraction system should commence immediately upon agreement of the SEW by the Agency.

4. **Telemetry System:** A telemetry system was due to be installed at the facility by 29th May 2004. This system has not yet been installed.

This is a non-compliance with Condition 3.21.1 of the Waste Licence.

Corrective Action Required

Install a telemetry system at the facility which meets all the requirements of Condition 3.21.1 of the Waste Licence.

5. **Facility Security:** A security fence was due to be installed along the entire length of the existing rights of way adjacent to the facility by November 2003. This security fence is not in place along the fisherman's right of way.

This is a non-compliance with **Condition 3.4.3** of the Waste Licence.

Corrective Action Required

As requested previously (SI03OC and SI04OC) submit a proposal to the Agency detailing the installation of the security fence along the entire length of existing rights of way as per Condition 3.4.3. In the proposal include a map marking the existing rights of way and clarify whether vehicular access via the rights of way is permitted. The erection of the security fence must be completed as soon as possible.

Mr. Whelan informed me that Waterford County Council propose to install a temporary fence along this area and a permanent security fence is to be installed on completion of the capping works.

- 6.. **White Goods Storage at Civic Amenity Area:** As noted during a previous site inspection (SI04OC) a significant amount of white goods were stored outside the designated container on hardstand adjacent to the container, a number of white goods were also observed in the roofed green waste storage area.

This is a non-compliance with **Condition 5.8.2** of the Waste Licence.

Corrective Action Required

Mr. Whelan informed me that an additional container has been purchased and it is undergoing alteration works prior to being installed on-site. In the interim the licensee is advised to increase the frequency of collection of white goods from the facility to prevent large accumulations of white goods on-site.

7. **Permanent Gas Monitor:** There was no permanent gas monitoring system installed in the site office. The was due to be installed by 29th May 2003.

This is a non-compliance with **Condition 3.22.1** (ii) of the Waste Licence.

Corrective Action Required

Immediately install a permanent gas monitor in the site office.

8. **Leachate Removal Records:** I was informed that a number of tankers of leachate have been removed from the facility to a Waste Water Treatment Plant. However, no leachate removal records were available. This was previously noted in the Audit Report of 2003.

This is a non-compliance with **Condition 10.5** of the Waste Licence.

Corrective Action Required

Ensure that all future consignments of leachate removed from the facility are recorded in accordance with Condition 10.5 (a-e).

9. **Leachate Management:** I was informed that a leachate collection drain has not been installed around the entire perimeter of the landfill. This was due to be installed by 29th November 2003. As noted previously additional leachate infrastructure (leachate sump) has been installed at the facility without the submission and agreement of SEW's by the Agency.

This is a non-compliance with **Condition 3.13.1** of the Waste Licence.

Corrective Action Required

Immediately submit a SEW for the installation of a perimeter leachate collection drain, once agreed by the Agency, work is to commence immediately.

As previously requested (SI04OC) submit as built drawings and a CQA report for the new leachate sump as per Condition 3.2.3. In the report include a comparison of the leachate management currently at the site compared to the requirements of Condition 3.13.

10. **Leachate Monitoring Point:** As previously noted (SI03OC and SI04OC) an additional leachate monitoring point within Landfill Area 2 was due to be installed at the facility by 29th November 2003. The provision of this monitoring point is important to allow for the sampling and analysis of leachate in the southwest section of the facility. An additional leachate monitoring point in Area 2 has not been installed at the facility.

This is a non-compliance with **Condition 3.23.3 (i)** of the Waste Licence.

Corrective Action Required

Immediately install the additional leachate monitoring point. A number of other monitoring points were required to be installed under Conditions 3.22.1(i), 3.22.1(ii), 3.22.2(i) and 3.22.2(ii), Mr. Whelan informed me that these monitoring points have now been installed. As previously requested submit a status report on the installation of all additional monitoring points including a revised map detailing the location of all monitoring points.

Inspection Observations

While these observations do not constitute non-compliances with any condition of the Licence, they should be addressed or where relevant noted by the licensee in order to ensure compliance, improve environmental performance of the facility and provide clarification on certain issues, as required. Where requested the actions taken and clarifications requested should be reported back to the Agency.

1. **Leachate Management:** Condition 5.11.1 requires the frequency of leachate removal from the leachate lagoon to be such that a minimum freeboard of 0.75m is maintained in the leachate lagoon at all times. Mr. Whelan informed me that occasional visual checks are made on the leachate sump and subsequently a decision is made as to remove leachate off-site. I was informed that only a small number of consignments of leachate have been removed off-site.

Corrective Action Required

Install a measuring gauge at the leachate sump and ensure the requirements of Condition 5.11.1 and 5.11.2 are adhered to. Leachate levels in the sump should be measured on a daily basis and a record of such inspection kept on-site for inspection by Agency personnel.

- 2. Training:** Mr. Whelan has commenced the FAS Waste Management Course. It was previously recommended (SI03OC) that the site caretaker (Mr. Bill O'Keefe) be trained by the facility management on the relevant conditions of the Waste Licence. Records of the training and the content of the training was to be kept on-site. The training records were not available on-site.

Corrective Action Required

Ensure that Mr. Whelan completes the FAS Waste Management Course including the on-site assessment module.

Ensure that Mr. O'Keefe is trained on the relevant conditions of the Waste Licence and records of any training undertaken are kept on-site.

Keep a log of the time spent by the Manager and the Deputy Manager at the site.

The licensee is reminded of Condition 2.1.4 which states that personnel performing specifically assigned tasks shall be qualified on the basis of appropriate education, training and experience and shall be aware of the requirements of this licence.

- 3. Nuisance Inspections and Gas Monitoring:** I requested to examine the weekly nuisance inspections and the monthly gas monitoring results. I was informed that the nuisance inspection sheets were at the County Council buildings and the gas monitoring results were at Tramore Landfill and were not available on-site.

Corrective Action Required

Ensure that copies of nuisance inspections and gas monitoring results are kept on-site and are available for inspection by Agency personnel.

The licensee is reminded of the requirements of Condition 10.1 to keep copies of certain documents on-site.

- 4. Surface Water Management:** The drainage arrangements at the Civic Amenity Area were not clear at the time of inspection. Surface water management measures are detailed in Condition 3.16.

Corrective Action Required

Provide a drawing indicating the drainage arrangements for the Civic Amenity Area, including the transfer building, and composting area. Outline the current status of the surface water management for the entire facility as required by Condition 3.16.1. Submit this drawing by 29/10/2004.

5. **Permanent Cap:** Condition 5.4.4 of the Waste Licence states that all areas shall be permanently capped by 31st December 2005. No capping works have commenced at the facility as yet.

Corrective Action Required

Submit a timeframe/schedule for these works ensuring the work will be completed by 31st December 2005.

6. **Inert Waste Acceptance:** It was noted that inert waste is being accepted at the site for restoration purposes.

Corrective Action Required

The licensee is reminded of the requirement to ensure that the inert waste being accepted at the site is being tested to ensure that it complies with the standards set out in Schedule F of the licence.

All inert waste accepted at the site for restoration purposes must be weighed.

7. **Groundwater Monitoring:** Condition 8.6 of the licence requires all private wells within 500m of the facility to be monitored (subject to agreement of the well owners).

Corrective Action Required

Please clarify whether there are private wells within 500m of the facility. All private wells within 500m of the facility must be included in the next round of monitoring.

8. **Container Storage On-Site** During the previous site inspection (conducted on 06/07/2004) it was noted that 18 large containers were stored adjacent to the Transfer Building. The site inspection report required the licensee to clarify the purpose of the containers. During the course of the inspection I required an up-date on all the corrective actions noted in the previous site inspection report. I was informed that the containers arrived on-site after being ceased by authorities in Co. Cork due to incorrect TFS documentation. I was informed that the containers were full of recyclable waste, the waste was transferred into different containers and was then removed off-site.

Corrective Action Required

The Agency should be kept informed of incidents such as this and the temporary storage of waste on-site may in some cases require first agreement of the Agency.

3. Follow-Up Actions

The licensee shall take the actions required to close out the non-compliances and observations raised in this Site Inspection Report. These actions will be verified during subsequent Inspections.

Please quote the above Inspection Reference Number in any future correspondence in relation to this Report.

Report prepared by Olivia Cunningham **Date:**
Inspector:
