

MEMO			
TO:	Board of Directors	FROM:	Peter Carey
CC:		DATE:	11 May. 01
SUBJECT: Technical Committee Report on Objections to Proposed Decision Reg. No. 63-1.			

Application Details	
Applicant:	Donegal County Council
Location of Activity:	Drumabodan Landfill Site, Kilmacrennan, Co. Donegal.
Reg. No.:	63-1
Licensed Activities under Waste Management Act 1996:	Third Schedule: Classes 1, 13
Proposed Decision issued on:	6 th February 2001
Objections received from:	Donegal County Council
Date Objections received:	2 nd March 2001
Inspector:	Mr. Cormac Mac Gearailt

Consideration of the Objection:

The Technical Committee (Peter Carey, Chairperson, Caoimhin Nolan and Sara Kennelly committee members) have considered all of the issues raised and this report details the Committee's comments and recommendations following examination of the objection.

Objection: Donegal County Council

One objection to the proposed decision was received from Donegal County Council. The issues raised in the objection are addressed below.

Ground 1 - Condition 2.2.1 Corrective Action

The objector requests that 12 months be given to submit this information. They state the reason for this request is to facilitate the council in establishing a consultancy brief, gaining council approval for budgeted expenditure, selecting a suitable service provider, achieving council approval for the recommendation, awarding contract and subsequent preparation of the information. The objector considers that in the event of external contracts being required, up to 6 months will be needed to appoint a contractor. They state that an additional six-month timescale should be provided to allow the contractor / consultant to prepare, issue and agree the information requirements.

Technical Committee's Evaluation

The TC notes Condition 2.2.1 requires the licensee, within six months of the date of grant of this licence, to establish and maintain written Corrective Action Procedures to ensure that corrective action is taken should specified requirements to the licence not be fulfilled. The length of this procedure is unlikely to exceed one A4 page. The timescale specified in the PD of within six months is considered appropriate.

Recommendation

No change.

Ground 2 - Condition 2.3.1 Awareness and Training

The objector requests that the timescale given in this condition be changed from six months to twelve months for the reason detailed in Ground 1.

Technical Committee's Evaluation

The timescale specified in the PD of within six months is considered appropriate.

Recommendation

No change.

Ground 3 - Condition 4.7.1

The objector requests that a period of 12 months from the date of issue of the licence be provided for the implementation of a leachate management programme at the site. They state that this is to ensure the Council is provided with adequate time to allow for the installation of the gravel and perforated pipe drainage system and the procurement of services.

Technical Committee's Evaluation

The TC notes that Condition 4.7.1 of the PD requires the licensee to implement a leachate management programme by 31 July 2001. The leachate management programme includes upgrading the leachate collection toe drain to a gravel and perforated pipe drainage system. The timescale specified in the PD is approximately six months. The TC do not consider that the installation of this drain should take twelve months as requested by the objector, however the TC recommend the changing of the wording of the condition from the given date to within six months of the date of grant of the licence.

Recommendation

Amend Condition 4.7.1 to read as follows:

- 4.7.1 **Within six months of the date of grant of this licence**, the licensee shall implement a leachate management programme. This shall consist *inter alia* of the following:
- (i) Installation of three leachate abstraction wells. Leachate shall be pumped from these wells to the leachate treatment system.
 - (ii) Provision of an appropriately sized leachate treatment system.
 - (iii) Installation of mains power to operate leachate extraction pumps.
 - (iv) Separation of clean and contaminated surface water, and discharge of contaminated surface water to the leachate treatment system.
 - (v) Upgrading the leachate collection toe drain to a gravel and perforated pipe drainage system. The leachate collection toe drain shall be keyed into and covered by the capping layer, once the capping layer is installed.

Ground 4 - Condition 4.7.2

The objector requests that a period of 18 months from the date of grant of the licence be provided prior to reporting on the effectiveness of the leachate system. They state that this is to allow a full season to have passed thus ensuring that the most severe conditions are encountered.

Technical Committee's Evaluation

The TC notes that Condition 4.7.2 of the PD requires the licensee to provide a report on the effectiveness of the leachate management system within nine months of the date of grant of the licence. The TC considers that after implementation of the leachate management programme (controlled by Condition 4.7.1 for which a recommended amendment is given above), a period of six months should be given for the assessment of its effectiveness. This enables two sets of the quarterly monitoring returns for ground water, surface water and leachate to be used in the assessment after its installation. The TC recommends the timescale be changed from nine months to twelve months to reflect this and an annual assessment of the effectiveness of the system thereafter. The TC also notes that the licensee is required to control the discharge of treated leachate to the River Leannan, emission limits have been set and if exceeded the licensee is required to make alternative arrangements to deal with the treated leachate.

Recommendation

Amend Condition 4.7.2 to read as follows:

4.7.2 Within **twelve** months of date of grant of this licence **and annually thereafter**, the licensee shall provide a report examining the effectiveness of the leachate collection and control measures in operation on-site. **At least two sets of monitoring results for groundwater, leachate and surface water, taken subsequent to implementation of the leachate management programme, should be used in the initial assessment (in accordance with Schedule D.5).** This report should also provide recommendations to improve the effectiveness of the leachate capture and control measures, if necessary.

Add to Schedule B, Table B.1 the above annually recurring report.

Ground 5 - Condition 4.8

The objector requests that a period of 9 months from the date of grant of the licence be allowed for the assessment of the existing flood protection bund. They state the reason detailed in Ground 1 for their request.

Technical Committee's Evaluation

The TC notes that Condition 4.8 of the PD requires the licensee to submit a site survey to assess effectiveness of the existing flood protection bund within three months of the date of grant of the licence. As the timescale within this Condition only refers to the submission of a survey/report and not the carrying out of the works recommended in the survey, the TC consider the timescale specified in the PD as appropriate.

Recommendation

No change.

Ground 6 - Condition 4.10

The objector requests that within the final capping layer the total thickness for the topsoil, subsoil and drainage layers be reduced to provide an overall thickness above the low permeability layer of 1m. They accept that the EPA Landfill Manuals indicate the same details for capping layers as outlined in the proposed conditions, but state that 1m above the drainage layer is more than

required, given that the end use of the site is likely to be rough grazing. They propose that the drainage layer thickness and depth above this layer be agreed before installation.

Technical Committee's Evaluation

The TC notes that Condition 4.10 of the PD specifies, unless otherwise agreed with the Agency, the components of the final capping system including depths. The TC considers that the objector does not provide sufficient detail to warrant alteration of the cap and consider that Condition 4.10 provides enough flexibility, provided a reasonable proposal is forwarded, for this matter to be dealt with by the Agency when the facility is licensed.

Recommendation

No change.

Ground 7 - Condition 7.7

The objector requests the timescale specified within the condition to be changed from three months to nine months for the reason detailed in Ground 1.

Technical Committee's Evaluation

The TC notes Condition 7.7 refers to a proposal for toxicity testing to be submitted to the Agency. The TC considers the timescale specified for the submission of this proposal as appropriate.

Recommendation

No change.

Ground 8 - Condition 8.1

The objector requests that the reference to Malin Head datum within the condition be removed. They state that an arbitrary datum and not Malin Head datum was used as the basis to produce the restoration drawings previously submitted. They propose that Donegal County Council provide a current topographical survey of the site to Malin Head datum and updated proposed restoration and closure heights before a final height of the facility is agreed.

Technical Committee's Evaluation

The TC notes that Fig. C7/07 and Drawing No. 3026.25/A11 of the application gives final contours for the facility that are not referenced to Malin Head datum. The TC also notes that a maximum height of 28m is shown in these drawings whereas the PD specifies a final height of 25m OD (Malin Head). The TC considers that the final height for the facility in the licence should be specified as 28m and since arbitrary datum was used as the basis to produce restoration drawings, the licensee should be required to convert this height of 28m and associated drawing to Malin Head datum. The TC considers that the final profile for the facility to Malin Head datum can be agreed following the submission of the revised Restoration and Aftercare Plan. The TC considers that a timescale for the implementation of the restoration and aftercare plan for the facility should also be included. The TC notes that the 'Introduction' to the licence should also be amended to reflect the changed final height.

Recommendation

Amend Condition 8.1. to read as follows:

8.1. A revised Restoration and Aftercare Plan for the facility shall be submitted to the Agency for agreement within six months of date of grant of this licence. This plan should also

incorporate landscaping proposals for the facility. **The revised plan shall include the proposed final profile of the facility based on a topographical survey carried out to Malin Head datum. This plan shall be implemented within four years from the date of grant of this licence. The final height of the facility shall not exceed 28m referenced to the datum used to produce Drawing No. 3026.25/A11. The licensee shall within six months of the date of grant of the licence submit to the Agency for its agreement, Drawing No. 3026.25/A11 and the final height of 28m converted to Malin Head datum.**

Amend the reference to facility height contained within the Introduction to the waste licence.

Introduction

This introduction is not part of the licence and does not purport to be a legal interpretation of the licence.

This licence is for the orderly closure, capping and restoration of the landfill at Drumaboden, Kilmacrennan, Co. Donegal

The existing facility covers a total area of 8ha. Waste has been deposited on approximately 50% of this area. Donegal County Council will only be permitted to accept inert waste for disposal for the purposes of restoration and aftercare of this site. Activities carried out on site will consist of leachate treatment and disposal of inert waste. The quantity of inert waste to be accepted is limited to 40,000 Tonnes, and the maximum height of the facility shall not exceed **28m referenced to the datum used to produce Drawing No. 3026.25/A11OD**. The Council must manage

Ground 9 - Condition 9.2

The objector requests the timescale specified within the condition to be changed from six months to twelve months for the reason detailed in Ground 1.

Technical Committee's Evaluation

The TC notes Condition 9.2 requires the installation of monitoring locations to check for off-site landfill gas migration. The TC considers the timescale specified to do this work as appropriate.

Recommendation

No change.

Signed:

Peter Carey
Technical Committee Chairperson