## **INSPECTORS REPORT**

WASTE LICENCE REGISTER NUMBER: 66-2

FACILITY: Rampere Landfill, Rampere, Co. Wicklow.

**APPLICANT: Wicklow County Council INSPECTOR: Olivia Cunningham** 

#### INSPECTOR'S RECOMMENDATION:

That a Revised Waste Licence 66-2 be granted subject to conditions.

## (1) Introduction:

This report relates to an application received from Wicklow County Council for a review of the existing waste licence for Rampere landfill (Reg. No. 66-2). Wicklow County Council has operated a landfill at Rampere since ca. 1980. A waste licence (Reg. No. 66-1) was issued to the Council for the facility on 15<sup>th</sup> April 2002. The facility is located in a rural area approximately 2km north of Baltinglass about 1km to the west of the N81 (*Fig. 1 Appendix I of this report*). The existing landfill covers an area of 1.7ha bounded to the south by a public roadway (L 4284), to the east by agricultural pastureland, to the west by agricultural pastureland and a public roadway (L 8284) and to the north by Rampere Stream. There are approximately 23 dwellings within 500m of the facility's footprint. The extension will cause two houses on the southwestern corner of the facility boundary to come within 60m of the proposed site boundary, whereas this distance would have been approximately 330m before (*Fig 2 Appendix 2*). The existing licence allows for a maximum waste disposal of 11,500 tonnes per annum.

The application for a review of the Waste Licence is for the extension of the landfill by way of installing three engineered lined cells (5.5ha area) to the west of the existing landfill and for the continuation of landfilling in the remainder of the existing facility. The extension will include a leachate collection and landfill gas collection system. The application also allows for an extension and relocation of the existing civic amenity area.

The applicant has applied for a total waste intake for disposal of 50,000 tonnes per annum which includes household and commercial waste (47,000 tonnes) and treated sewage sludge (3,000 tonnes). The proposed extension shall have a capacity of approximately 250,000-300,000m<sup>3</sup>. It is envisaged that the extension will receive waste until 2008.

The classes of activity applied for by the applicant and for which I recommend to be granted are:

Waste Disposal Activities – 3<sup>rd</sup> Schedule

Class 2 Relates to the disposal of treated sewage sludge.

Class 4 Relates to the storage of leachate.

*Class 5.* Relates to the landfilling of waste in lined cells.

# Waste Recovery Activities – 4th Schedule

- *Class 4.* Relates to the collection of recyclables at the Civic Waste Facility and the reuse of inert waste for landfill restoration and construction works.
- Class 13. Relates to temporary storage of recyclable and reusable wastes pending their collection at the Civic Waste Facility.

**Class 5** of the Third Schedule is the Principal Activity applied for.

The environmental impacts and associated mitigation measures at the existing facility are addressed in the Inspector's report (See Appendix II) that accompanied the Proposed Decision for the existing Waste Licence 66-1.

#### **Site Visits:**

DATE	PURPOSE	PERSONNEL
17 <sup>th</sup> December 2002	Site Notice Check	O. Cunningham
4 <sup>th</sup> February 2003	Site Visit	O. Cunningham
30 <sup>th</sup> April 2003	Audit	D. Shannon & O. Cunningham
21 <sup>st</sup> May 2003	Routine Monitoring	D. Shannon
19 <sup>th</sup> June 2003	Site Visit	O. Cunningham
25 <sup>th</sup> June 2003	Site Visit- complaint related	O. Cunningham
08 <sup>th</sup> August 2003	Site Visit- cell liner check	O. Cunningham
18 <sup>th</sup> August 2003	Site Visit – collect waste records	O. Cunningham
02 <sup>nd</sup> September 2003	Site Visit	O. Cunningham

#### **General Information:**

Quantity of Waste (tpa)	50,000 tonnes per annum	
EIS Required	Yes. I have assessed the EIS and am satisfied that it complies with the EIA and Waste Licensing Regulations	
Date of Application	22 <sup>nd</sup> November 2002	
Number of Submissions received	12	

A plan showing the location of the facility to which the application relates is provided in Appendix 1 (Drawing No. DG0001 Rev. A02).

## (2) Issues arising from this Application for Review

- 1. <u>Proximity of the proposed extension to nearby residences:</u> Two residences will lie within 60m of the proposed Cell 3, 55m and 57m respectively. In order to mitigate against any potential environmental nuisances in close proximity to these residences I consider that mitigation measures be taken at Cells 1-3 to avoid odours and to remedy visual/noise intrusion of the landfill:
  - Condition 3.13.1 of the Proposed Decision specifies that a 50m Buffer Zone, in which no waste shall be landfilled, be provided in the southwestern corner of the facility boundary adjacent to the closest residences. This will allow for a distance of approximately 100m between the residences and the landfill footprint. This will replace the applicant's proposal for a 3-5m wide buffer zone only.
  - Condition 5.10.1.1 of the recommended Proposed Decision specifies that only treated sewage sludge with greater than 25% solids shall be accepted at the landfill extension. In the interim and to provide Wicklow County Council time to supply a sludge dewatering service, treated sewage sludge with a lower solids content (17%) may be disposed of in the existing landfill. Acceptance of treated sewage sludges of a higher soilds content will result in reducing odours which often arise from wetter sludges.
  - Condition 5.8.1 of the recommended Proposed Decision specifies that a detailed landscaping plan (i.e. the installation of screening bunds, planting around the buffer zone, timescales etc.) shall be submitted to the Agency for its agreement no later than two months from the date of grant of this licence. The existing hedgerow network, which forms the southern boundary of the proposed extension, shall be retained and reinforced by the licensee. (Condition 5.8.2).
  - Condition 8.1 of the recommended Proposed Decision specifies that the noise and dust monitoring at all locations shall commence no later than two months from the date of grant of the licence. The dust and noise monitoring locations are specified in Schedule D.1 (Emission limits are specified in Schedule C), all centred on the housing nearest the landfill extension.
  - Condition 8.15.1 of the Proposed Decision specifies that weekly nuisance inspections be carried out and that daily odour surveys be carried out, particularly in the area surrounding the sensitive receptors. Condition 8.16.1 of the Proposed Decision provides for an independent odour assessment of the facility within six months of the date of grant of this licence, this is to be repeated annually.
  - Condition 7.4 of the recommended Proposed Decision specifies noise restrictions at the facility and the provision of a noise/visual barrier along the south-western boundary of the facility. Condition 5.8.1 provides for screening of the barrier.
  - Condition 5.1 of the recommended Proposed Decision prohibits the deposition of waste in any cell or part of the landfill without prior agreement with the Agency. If the development of the cells on the western boundary of the site is causing a nuisance to nearby residences, the Agency may decide to further restrict the landfilling in this area.
  - 2. <u>Surface Water Control:</u> This issue is of concern as there have been a number of enforcement issues in relation to poor surface water management in the past. Condition 3.16.1 (b) of the recommended Proposed Decision details the construction

of a surface water retention pond to which all run-off arising from capped and restored areas is to be diverted. Surface water arising from impermeable surfaces is to be diverted to a silt trap and oil interceptor, whilst run-off from the waste quarantine and waste inspection area is to be diverted to the leachate collection chamber. Condition 6.5.3 of the recommended Proposed Decision requires the submittal of proposals for the continuous monitoring of water in the surface water retention pond.

3. <u>Adequacy of management structure</u>, <u>staffing and supervision</u>: Condition 2.1.1 of the recommended Proposed Decision requires that the facility must be supervised at all times by a suitably qualified and experienced manager or by a nominated deputy. The facility was in operation for a period of time without a full-time facility manager, however, a full-time facility manager has now been employed at the facility.

## (3) Facility Development

#### *Infrastructure*

The installation and control of all existing and proposed infrastructure at the facility is controlled by Condition 3 of the recommended Proposed Decision.

Existing infrastructure includes security and stockproof fencing, a car park area, facility offices, weighbridge, wheelwash, haul roads and access roads to the cells, a waste inspection/quarantine area. New site infrastructure proposed includes an administration building, extension of the Civic Amenity Area, , landfill gas collection infrastructure and an extended laechate collection system. The applicant proposes new 24 hour CCTV security cameras. Condition 3.10 of the recommended Proposed Decision provides for the installation of a Wastewater Treatment facility for the treatment of sewage arising on-site.

### **Lining**

Most of the existing landfill is not lined, bar one recently lined cell, since it was designed as a dilute and disperse unit. Condition 3.12 of the recommended PD sets out the requirements for the lining of the 3 future cells as per the EU Landfill Directive.

## Leachate Management

Leachate management at the existing landfill is restricted to the newly lined cell. Leachate in the newly lined cell (active cell) is collected in a leachate collection chamber and tankered to Baltinglass WWTP. Leachate generated in the three new cells will flow by gravity to the leachate collection system. From the sump in each cell, leachate will be collected and conveyed in separate pipes to a Leachate Collection Chamber, the chamber will have level indicators that will monitor leachate levels which will be equipped with alarms. Condition 3.14 of the PD provides for the installation and maintenance of a leachate management system.

Conveyance of leachate to Baltinglass WWTP is proposed by one of two methods:

- 1. Tankering
- 2. Pumping

Condition 3.14.3 of the PD requires the conveyance of leachate to a suitable WWTP to be agreed in advance with the Agency.

#### **Cover and Capping**

Condition 4.2 of the recommend Proposed Decision sets the final capping requirements at the facility and Condition 5.7 sets out the daily and intermediate cover requirements.

#### Landfill Gas Management

There is currently no landfill gas management infrastructure in place at the facility. Condition 3.15 of the PD sets landfill gas management requirements at the facility.

## Restoration & Aftercare

Condition 4.1 requires a revised Restoration and Aftercare Plan to be submitted to the Agency to reflect changes due to the requirements of this Proposed Decision.

#### Nuisance Control

The nuisance controls for the facility are specified principally by Condition 7 of the recommended Proposed Decision. These include the use of litter fencing, litter picking and appropriate covering of waste filled areas (Conditions 7.3). Vermin control measures are detailed in Conditions 7.1 and 10.7 of the recommended Proposed Decision. The licensee is required within three months of date of grant of this licence to submit to submit a proposal for the control and eradication of vermin and fly infestations at the facility (Condition 11.5.1).

Further provisions to mitigate against the potential for nuisances impacting on nearby residents include a restriction on the water content of treated sewage sludge being deposited in cells 1-3(Condition 5.10.1.1); provision of a buffer zone (Condition 3.13), retention of hedgerows (Condition 5.8.2); provision of a noise barrier (Condition 7.4) and landscaping (Condition 5.8.1). Noise and dust monitoring must commence no later than two months from the date of grant of the licence. (Condition 8.1).

The recommended Proposed Decision requires weekly inspections of the facility and environs for nuisances and for records of such to be maintained (Conditions 8.15 and 10.3). Daily odour surveys and an independent odour assessment is also provided for (Condition 8.16)

## (4) Waste Types and Quantities

The applicant has applied to dispose of up to 50,000 tonnes per annum at the facility with the proposed extension estimated to provide capacity for an additional 250,000-300,000 tonnes. The applicant anticipated that at the rate of waste acceptance in 2001 the extension would allow for the disposal of waste at the facility up until 2008. Condition 1.4 of the recommended Proposed Decision allows for the acceptance of Municipal Waste, Commercial Waste and Treated Sewage Sludge for disposal at the facility subject to the restrictions in Schedule A (Table A.1) and Condition 1.5. The categories and volumes of waste are as follows:

47,000 tonnes per annum Municipal [for consistency with earlier reference] and Commercial waste

3,000 tonnes per annum Treated sewage Sludge

The existing licence allows for the disposal of up to 11,500 tonnes per annum.. The acceptance of Construction and Demolition waste is allowed for use on site as cover material and the restoration of cells.

The recommended Proposed Decision (Condition 5.3) also requires the development and submission to the Agency of Waste Acceptance and Characterisation procedures having

regard to the EU Decision (2003/22/EC) on establishing the criteria and procedure for acceptance of waste at landfills. Condition 11.3 requires a report examining waste recovery options to contribute to the achievement of the recovery targets stated in the national and European waste policies.

#### (5) Management and Control of Emissions to the Environment

The environmental impacts and associated mitigation measures associated with this facility were addressed in detail in the Inspector's Report which accompanied the Proposed Decision for the existing Waste Licence 66-1 (See appendix 3). Requirements for facility management and an Environmental Management System for the management of leachate and the control of emissions to air (landfill gas, odour, dust and noise), surface water and groundwater, and requirements for the progressive capping and final restoration and aftercare of the landfill in general, reflect those set out in the existing Waste Licence. The new measures to be implemented particularly with regard to surface water, leachate management and visual mitigation measures have already been discussed in detail in Sections 2 and 3 of this report.

Monitoring locations and frequencies as specified in the relevant schedules of the recommended PD reflect the current monitoring regime as agreed with the Agency during the enforcement of the existing waste licence. Additional requirements for monitoring in the recommended Proposed Decision are detailed in Conditions 3.21 and 8.2 of the Proposed Decision.

## (6) Waste Management Plans

The Waste Management Plan for the Wicklow Region (2000- 2004) adopted by Wicklow County Council was considered. The plan refers to possibility of extending the life of the existing landfill at Rampere by way extending the site area. Therefore, I consider that the proposed extension of the facility is consistent with National and Regional Policy and the identified interim waste capacity needs for Wicklow.

## (7) Submissions/Complaints

A total of 12 valid submissions were received in relation to the licence application. I have had regard to all of the submissions in making this recommendation to the Board. Below is a summary of the main concerns raised in the submissions:

## 1. Proximity of Residences to Landfill

A large number of submissions referred to the proximity of residences to the proposed extension. Distances ranged from 500m to 3yards. Most submissions stated that their properties and families would suffer the full impact of the landfill. A number of submissions refer to the Building Control Act, 1990 and the Draft EPA site selection manual which states that a buffer zone of 250m should be maintained between the area to be landfilled and any occupied dwelling at new landfills.

#### Response

This matter has been dealt with in Section 2 of this report.

#### 2. Visual Impact

One submissions states that the proposed development will significantly alter the views available from the residence. They also state that the height and construction of the noise barrier proposed will not be aesthetically pleasing in the context of a rural setting. A series of photographs were also included in the submission.

#### Response

See section 2 of this report.

#### 3. Rats

Many of the submissions expressed concern about the increased rat population in the area due to the presence of the landfill. One resident's rat infestation was so severe that an Environmental Health Official from Wicklow County Council was called out to examine the situation. One mother stated that her family has a problem with rats in the garden and as a consequence she is concerned for her children's health. A number of submissions indicated that the residents in question lay rat poison at their own expense.

## Response

Vermin controls are required under Condition 7.1. Condition 11.5.1 requires the submittal of a proposal for the control and eradication of vermin and fly infestations. Condition 10.7 requires that a written record be kept of the programme for the control and eradication of vermin and fly infestations at the facility. Condition 8.15 requires weekly inspections for evidence of nuisances such as vermin and that records be kept of these inspections. The covering of the working area is controlled by Conditions 5.6.2 and 5.6.3 of the Proposed Decision, which will reduce the attraction of the landfill to vermin.

#### 4. Odours and Landfill Gas

A number of submissions expressed concern over foul and sometimes unbearable odour from the existing facility. One submitter states that the foul odour affects them greatly. Another submitter expressed concern over the flaring of landfill gas and states that she visited a landfill site where flaring was being carried out and experienced a nauseating and horrific odour from the process. Concern was also expressed over families being evacuated from their homes in other areas close to landfills where landfill gas migration was detected.

#### Response

Conditions 5.6 and 5.7 require that the working face be covered on a daily basis and any cover material that has been removed or eroded be replaced by the end of the working day, this will decrease the risk of odours migrating off-site. Condition 7.1 requires that the activities at the facility shall be carried out such that odours do not give rise to nuisance at the facility or in the immediate area of the facility. Condition 3.15.1 of the recommended Proposed Decision requires the installation of infrastructure for the active collection and flaring of landfill gas within twelve months of the date of grant of the licence which if properly operated will not cause obnoxious odours. Condition 3.21.1(b) requires the installation and monitoring of perimeter boreholes to detect landfill gas migration.

## 5. Traffic

Many of the submissions refer to the unsuitable road infrastructure in the vicinity of the landfill and state that the roads are only 11-12ft wide and that it would be impossible for a car and a lorry to get past eachother on parts of these roads. Several of the submissions are concerned at the increase in traffic, including HGV's, as a result of the proposed extension at the facility. One submitter is very concerned about the suggested traffic alignments proposed in the EIS, particularly traffic turning right and the use of small humped back or arched

bridges which have 10 tonne restrictions. This submission also states that traffic coming from the south of the county will have no option but to pass through the town of Baltinglass, which is already heavily congested, this means passing the hospital, the R.C. church and two schools, each with approximately 400 students. One submission also stated that the increase in volume of traffic would have a negative effect on tourism and they also raised concern over the pollution from vehicular exhausts. Concern was also expressed at the cost and logistics of transporting waste from the heavily populated east to the less populated west of Co. Wicklow.

## Response

Condition 3.19.1 of the recommended Proposed Decision states that traffic awaiting access to the landfill shall queue inside the facility boundary along the site access road and not along the public road. Traffic management and the provision of adequate roads accessing the facility is a matter for the NRA and Wicklow County Council.

#### 6. Environmental Nuisance

A number of submissions expressed concern with regard to nuisances caused by birds, flies and litter. The submissions refer to ongoing nuisance from the facility from the above and concern that such nuisances could increase due to the extension of the facility. A number of submissions stated that flies are a serious problem particularly during the summer months. Concern was also expressed about birds, particularly seagulls, transporting paper and plastic items over neighboring fields.

#### Response

Condition 7 of the recommended Proposed Decision deals with the control of nuisances from the facility and in particular Condition 7.1 requires the licensee to ensure that the facility is operated such that it does not give rise to nuisances. Records of all nuisance inspections are required to be maintained by the licensee (Condition 10.3(d)). Litter control measures are specified (Condition 7.3) and include a requirement for litter fencing around the perimeter of the active tipping area and that all vehicles delivering waste to and from the facility be appropriately covered. The licensee is required to maintain written records of the fly control measures undertaken at the facility (Condition 10.7). Bird control measures are specified in Condition 7.6.1 of the recommended Proposed Decision.

#### 7. Noise

A number of submissions express concern that the proposed extension would result in extra machinery usage at the facility to cope with the increase in volume of waste intake and therefore this will result in noise pollution in the vicinity. One submitter states that there will be no buffer zone between the Horan residence and the 3m high noise barrier which is proposed by the applicant, they also state that this will initially result in construction machinery operating right up to the residence site and disposal operations there at a later time which will result in a significant environmental impact to the occupiers of the residence. The effectiveness of the proposed noise barrier is also questioned.

#### Response

Condition 3.13 of the recommended Proposed Decision provides for a buffer zone between the landfill footprint and the facility boundary as described in Section 2 of this report. Condition 7.4 specifies that low level plant is used on-site, that speed restrictions are imposed on internal site roads and that a noise barrier is constructed along the south western corner of the facility, adjacent to the nearby residence so as to mitigate against noise pollution. The recommended Proposed Decision requires the licensee to comply with noise limits  $55L_{eq}dB(A)$  daytime and  $45L_{eq}dB(A)$  nighttime at noise sensitive locations.

#### 8. Health

A number of submissions raise health concerns. One submission states that they are very concerned about present research which states that 'there is a 7% risk increase in having a child born with Down's Syndrome or Spina Bifida to families living near a landfill site, another study completed by the Imperial College in London (2001) supports these findings'.

## Response

An August 2001 report by the Small Area Health Statistics Unit (SAHSU) in the UK presented results of epidemiological research commissioned by the Department of Health in collaboration with the National Assembly of Wales, other Departments and the Environment Agency. The research was to cover the largest possible range of landfill sites in Great Britain: it eventually included 9,565 landfills, all of which had been in operation for some or all of the period 1982-1997. The report considered the probabilities of birth defects, low birthweight, still births and certain cancers among the population living within two kilometres of a landfill site: it compared them with the probabilities in the population of those living more than two kilometres from a landfill. The report commented that it was not clear that landfills were causing these effects and that other explanations were possible – such as limitations with the data, or the possibility that the study did not completely take into account other relevant factors such as occupation or the use of medicines.

It is recognised that there are public concerns regarding the health impacts associated with waste facilities. The issue of baseline health data and adequate health information systems is a matter appropriate to the Department of Health and Children and the Health Boards.

## 9. Property Values

A number of submitters are concerned that if the proposed extension goes ahead, the value of their properties will decrease and as a result they will be unable to move out of the area.

## Response

Property values are outside the remit of the Agency.

#### 10. Leachate Management and Control

Concerns are raised in the submissions in relation to leachate escaping from the existing site into Rampere Stream. One submitter stated that a 6 inch flexible pipe was observed feeding from the bottom of the main landfill into Rampere Stream. Another submissions stated that the Rampere Stream Channel was diverted approximately 40-50 years ago and the original stream ran approximately 20 yards into and underneath the landfill, they are concerned that leachate and gas will enter the original channel. Concern is also raised by Eastern Regional Fisheries Board (ERFB) over the capacity of Baltinglass Wastewater Treatment Plant (WWTP) to cater for the volumes of leachate to be disposed of from the facility. The ERFB state that if the leachate from the development is to be treated at Baltinglass WWTP the plant must be upgraded and extended to ensure that the receiving water conforms to Salmonid Water Quality Standards.

## Response

Infrastructural requirements for leachate management are specified in Condition 3.14 of the recommended Proposed Decision. Conditions 3.12 and Condition 4.2 specify the lining and capping requirements to prevent the escape of leachate from the facility and to minimize the quantity of leachate being generated. Condition 3.14.2 of the PD states that leachate will be treated off-site at a suitable WWTP agreed in advance by the Agency. This will ensure that the WWTP utilized by the facility will have the capacity to treat the leachate. Schedule D.5

sets requirements for the monitoring of the quality of leachate including substances such as List I/II organic substances, specified metals and non-metals, mercury and cyanide.

## 11. Surface Water

The ERFB raised concerns regarding the protection of the Salmonid status of the River Slaney of which Rampere Stream is a tributary. The ERFB is particularly concerned about silt runoff during the construction and operation of the facility and state that the silt trap must be of adequate proportions to ensure that the discharge to Rampere Stream is at all times <25ppm suspended solids. They also suggest that regular chemical and biological monitoring of Rampere Stream, both upstream and downstream of the landfill site are made a condition of the waste licence. A number of submissions raise the issue of the proximity of the landfill site to the River Slaney; many of the submissions consider that the site is unsuitable and feel that the River Slaney has been polluted and continues to be polluted by the landfill site. A fisherman with 50years experience fishing on the River Slaney has noticed that the fish stocks in the river have been depleted and has observed contaminated water flowing from the present landfill into Rampere Stream. One submission states that the River Slaney flows past Baltinglass, Rathvilly and on to Carlow where people complain about the taste and the quality of the water.

## Response

Condition 3.16 of the recommended Proposed Decision specifies the requirements for the management of surface water on-site, including the prevention of contaminated water and leachate discharges into surface water drains and courses and the collection/diversion of run-off arising from capped and restored areas to a surface water retention pond. Condition 6.5.3 requires proposals for the continuous monitoring of the surface water retention pond. Condition 6.5 prohibits the discharge of raw leachate, treated leachate or contaminated surface water into Rampere Stream. Schedule C.4 of the PD sets out surface water discharge limits. Condition 3.16.1 of the PD requires all surface water run-off arising from impermeable surfaces to be diverted to a silt trap and oil separator prior to discharge. All silt traps and oil separators are to be adequately sized and be in accordance with European Standard prEN 858. Schedule D.5 of the PD sets out requirements for the monitoring of surface water and Condition 8.11 requires annual biological monitoring of Rampere Stream. See also response to issue 9 above.

## 12. Groundwater Protection

A number of submissions raise concerns with regards the potential for pollution of groundwater by leachate from the landfill and in particular the risk of private wells becoming contaminated. One submitter is concerned about the delay between the time of sampling of private wells and receipt of the results from such sampling.

## Response

Condition 8.8.1 of the recommended Proposed Decision requires that, subject to agreement of landowners the licensee shall commence a programme for the representative monitoring of groundwater quality of private wells. Condition 3.17.1 provides for groundwater management. Condition 6.4 prohibits direct emissions to groundwater. Schedule D.5 of the PD sets out requirements for the monitoring of groundwater. See also response to issues 9 and 10.

#### 13. Past Promises/History of the Site

One submission referred to the fact that the landfill has been in operation for 30 years. Reference was made to verbal promises that the landfill would be closed by 2000.

#### Response

Any such undertakings by the licensee by third parties were prior to and/or outside the waste licensing regulatory system and as such cannot be considered.

#### 14. Special Area of Conservation

A number of submissions refer to the proposed Special Area of Conservation designation for the landfill and surrounding lands. One submitter questions the viability of situating a landfill site adjacent to a proposed Special Area of Conservation.

## Response

After viewing the pcSAC maps of the area (Site Code 000781, Sheet 027a) I note that the landfill and surrounding lands do not fall within the pcSAC; the pcSAC lies approximately 1.5km north of the proposed extension. The Conditions in the PD will ensure that the waste activities at the landfill will have no significant impact on the pcSAC and its conservation objectives.

## 15. Video and Photographic Submissions

One video submission and one submission with attached photographs were received by the Agency.

## Response

The contents of these submissions were noted.

## 16. Strategic Environmental Planning

One submission raised concerns over the transport costs and implications of landfilling waste in west Wicklow when it is estimated that 80% of the waste to be landfilled in Rampere is generated in the more populated East Wicklow. The submission estimates an average transportation distance from collection point to Rampere as 50 miles resulting in a total haulage requirement of 2,000,000 tonnes-miles per year (A map detailing proposed routes was supplied). The submission refers to the proximity principle and states that the application runs contrary to the basis on which the County Waste Management Plans are formulated. The submitter also states that there will be significant environmental impacts arising from accidental waste spillages or arising from vehicular accident. The submission also states that the EIS did not include the alternative of contracting out the capacity to adjoining local authorities or through private facilities.

## Response

The Wicklow Waste Management Plan 2000-2004 provides for the extension of Rampere Landfill as a short-term measure. It is the responsibility of Wicklow County Council to provide for waste management in their jurisdiction. Condition 9.1 of the PD requires any incidents to be reported to the Agency and measures put in place to minimize the emissions and the effects thereof and put measures in place to avoid reoccurrence of the incident. Alternatives assessed for short term landfill capacity are discussed in section 2.5 of the EIS.

## (8) Recommendation

I recommend that a revised waste licence, subject to conditions, be granted in accordance with the conditions recommended in the attached recommended Proposed Decision.

In coming to this recommendation, I consider that the continued landfilling of non-hazardous waste in specified areas at the facility and the associated activities and works would, subject

to the conditions of the recommended Proposed D Section 40(4) of the Waste Management Act, 1996.	
Signed:	Dated:
Olivia Cunningham	
Inspector	
Environmental Management & Planning	

# APPENDIX 1

Drawing No. DG0001 Rev AO2 Marked with yellow sticker

# APPENDIX 11

Drawing No. DG0004 Rev AO1 Marked with yellow sticker

# APPENDIX 111

Inspectors Report and Technical Committee Report from the original licence