



Limerick County Council

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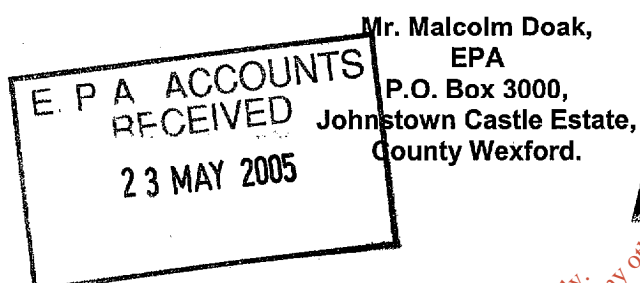
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Environment Section
E.S. 18/18(40) AL/COD

20th May, 2005



Re: **Objection to Waste Licence Proposed Decision 17-3
Gortadroma Landfill Facility**

Dear Mr. Doak,

In accordance with Section 42 of the Waste Management Acts, 1996 to 2003, Limerick County Council wishes to object to a number of conditions set out in the Proposed Decision on Waste Licence 17-3. The attached report gives the full grounds for the objection.

Please find enclosed three copies of the objection report and a cheque in the amount of €317.43 to cover the fee of the objection.

If you have any queries on the above please do not hesitate to contact the undersigned at the above address or Mr. John O'Carroll, Landfill Manager at 069 83255.

Yours faithfully,

Alan Lyons,
Executive Engineer,
Environment Section.

Encl.

c.c. Mr. Tom Tarpey Senior Engineer, Limerick County Council
Mr. John O'Carroll, Landfill Manager, Gortadroma Landfill Facility, Limerick County Council

DOCUMENT CONTROL SHEET

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TABLE OF CONTENTS

<u>GROUND FOR OBJECTION</u>	1
<u>CONDITION 3 – INFRASTRUCTURE AND OPERATION</u>	1
<u>CONDITION 3.10</u>	1
<u>CONDITION 3.19 (D)</u>	1
<u>CONDITION 3.19 (F)</u>	2
<u>CONDITION 3.25.2 (C)</u>	2
<u>CONDITION 6 – CONTROL AND MONITORING</u>	2
<u>CONDITION 6.11.2 (I) & SCHEDULE C 2.5</u>	ERROR! BOOKMARK NOT DEFINED.
<u>CONDITION 6.11.2 (II) & SCHEDULE C.2.2</u>	3
<u>CONDITION 6.11</u>	2
<u>CONDITION 6.11.2 (III)</u>	3
<u>CONDITION 10 - CLOSURE RESTORATION AND AFTERCARE</u>	3
<u>CONDITION 10.1</u>	3
<u>CONDITION 11 – NOTIFICATIONS, RECORDS AND REPORTS</u>	4
<u>CONDITION 11.7 & SCHEDULE E</u>	4
<u>SCHEDULES</u>	4
<u>SCHEDULE B.3</u>	4
<u>SCHEDULE C.3</u>	4
<u>SCHEDULE C 2.3</u>	4

Objection to Waste Licence Proposed Decision 17-3 under Section 42 of the Waste Management Act, 1996 to 2003.

GROUNDINGS FOR OBJECTION

Limerick County Council of County Hall, Dooradoyle, Co. Limerick, as operators of Gortadroma Landfill wish to object to certain conditions of the Proposed Decision on an application for a Waste Licence (Waste Licence Register 17-3) issued by the Environmental Protection Agency on 26th April 2005.

The specific objections are set out in the following sections.

CONDITION 3 – INFRASTRUCTURE AND OPERATION

CONDITION 3.10

It is requested that this condition be amended taking account of the following.

The surface water collection system at Gortadroma Landfill is designed to collect all surface water drains flowing within and through the site and divert them to the surface water settling tanks at the existing entrance to the site. It is also proposed to install a petrol/oil interceptor through which all run-off from hard standing areas within the site will pass before discharging to the Surface water settling tanks. This is further detailed in Section 2.2.11 of the Main Report of the EIS.

It is proposed that silt traps are not required on all surface water discharges from the facility since all surface water from the facility is diverted to and discharges from the storm water settling tanks. The storm water setting tanks operate on a weir system which allows retention of the waters and settlement of suspended solids to occur.

It is also proposed that an oil separator is not required on all surface water discharges from the facility but only from run-off from hard standing areas before discharge to the surface water settling tanks.

CONDITION 3.19 (D)

It is requested that this Condition be amended taking account of the following:

Recommended minimum standards on basal shape design are set down in Section 7.3.2 of the EPA Landfill Site Design Manual. The Manual recommends lining systems be constructed for the minimum slope of 1:100 in one direction and 1: 50 in the corresponding direction to ensure that there is one lowest point within the cell. Complying with a minimum fall of 1:50 in all directions may result in the necessity to excavate to greater depths or construct cells of smaller size than those described in the EIS, where the preliminary design was based on the recommendations of the Site Design Manual.

All further cell designs are to be forwarded to the EPA under Specified Engineering Works and agreement sought before construction commences. It is requested that this condition be amended to reflect the recommendation of the Site Design Manual or to refer to 'unless otherwise agreed with the Agency'.

CONDITION 3.19 (F)

It is requested that this Condition be amended taking account of the following:

The contour levels on Drawing No. B.5 of the Application illustrate the final contour levels of the filled cells not the formation levels of these cells.

CONDITION 3.25.2 (C)

It is requested that this Condition be amended taking account of the following:

This condition requires three monitoring points per cell. It is requested that the number of three monitoring points be reduced from three to one, on the basis that previous odour issues at Gortadroma have been partially attributed to infrastructure which punctures the capping system allowing landfill gas to be released. While every effort is made to design, construct, repair and maintain the cap surrounding these elements of infrastructure it would be preferable if they were not introduced on this basis.

It is understood from the Inspectors Report on the Licence Application that the basis for this proposed condition is the installation of the leachate recirculation system and thus a requirement to be more observant of the leachate levels within the cells. The recirculation system feeds leachate from trenches cut horizontally along the waste surface and therefore the leachate must percolate over a period of time through the waste body before reaching the leachate collection stone in a dispersed fashion. All cells over which the leachate recirculation system is installed, or proposed to be installed, are, and will be, fully engineered cells and the lining systems are constructed to have a fall to one specific point which is the lowest point in the cell, from where the leachate is abstracted and the highest head of leachate is recorded. Therefore additional leachate level monitoring points will only record levels of less significance to the monitoring point located at the lowest point within the cell and the necessity for this is queried. In addition to this Limerick County Council intend to install a separate leachate collection pump in cell 11 and in all future cells. These collections sumps will be also fitted with level recording and attached to the scada control system

CONDITION 6 – CONTROL AND MONITORING

CONDITION 6.11

It is requested that this Condition be amended taking account of the following:

An automated control system has been installed at the site for the control and management of leachate. This system is a 'hard-wired' system linked to a PLC control system in the administration block. The system does not operate by telemetry as the scale of the site enabled a hard-wired system

to be installed. It is requested therefore that the word '*telemetry*' be replaced with the words '*automated control*' system.

CONDITION 6.11.2 (II) & SCHEDULE C.2.2

It is requested that this Condition be deleted taking account of the following:

The storm water tanks only discharge to the White River through a pipe, there is no discharge from the tanks to perimeter streams.

The storm water settling tanks are designed to discharge over a weir system, through a pipe and a flap valve at the White River, overflow of these tanks is prevented due to the weir system, therefore the requirement for continual level monitoring within these tanks is queried.

CONDITION 6.11.2 (III)

It is requested that this Condition be amended taking account of the following:

Continuous quality monitoring equipment at the outlet of the storm water settling tanks will be installed. Surface water is discharged through a single pipe from the tanks to the White River. If this condition is requesting that additional quality monitoring equipment is installed at the end of this discharge pipe then its necessity is queried.

CONDITION 10 - CLOSURE RESTORATION AND AFTERCARE

CONDITION 10.1

It is requested that this Condition be amended taking account of the following:

Given the time to design and procure a capping and restoration scheme together with seasonal restraints key to the capping and restoration of any landfill site it would be difficult to cap and restore one cell at a time within 12 months of the cell being filled to the required level, given that this may require capping through the winter months. In order to prepare a design and contract documents, procure a contract, reshape the landfill, if required, install the capping layers, install the capping layers, install surface water management systems and plant/landscape the slopes taking account of limited productivity in autumn /winter it is considered that this could take up to 18 months. This is particularly the case given that Limerick County Council are obliged as a Local Authority to follow public procurement procedures for the execution of the works which can significantly add to the timescale involved in procuring any works at the site. For operational reasons it is also possible that at various stages during the life of the landfill, filled areas cannot be capped until adjacent areas have been brought up to the required level and for this reason capping may have to be temporarily delayed.

CONDITION 11 – NOTIFICATIONS, RECORDS AND REPORTS

CONDITION 11.7 & SCHEDULE E

It is requested that the Condition or the Schedule be amended taking account of the following:

The Condition requires that the licensee submit the AER by the 31st of March every year. The Schedule requires that the licensee submit the AER by the 31st January every year.

SCHEDULES

SCHEDULE B.3

It is requested that this Schedule be amended taking account of the following:

Under this schedule there is a maximum '*rate per second*' set for the emission limit of treated leachate to the White River. The pump within the treated leachate lagoon is a variable speed pump which uses the SCADA system to check and regulate the flow from the pump every fifteen minutes. The flow from the pump is dependent on the head of leachate above it and therefore cannot be set to run on a continual flow rate. The purpose of using a variable speed pump is to ensure that the minimum 40 dilutions is met at all times. It is proposed that a maximum rate of 5m³/hour be applied instead. It should be noted that this will still be subject to the minimum river flow of 50l/s and minimum 40 dilutions of effluent at all times in accordance with Schedule B3. If this is not acceptable it is requested that 'unless agreed otherwise with the Agency' is inserted.

SCHEDULE C.3

It is requested that this item in the Schedule be deleted:

In the table within this section '*Flow (pumped water from interceptor)*' is listed in the Parameter column. There are no pumped groundwater interceptors installed at Gortadroma and it is unclear as to what this is referring.

SCHEDULE C 2.3

It is requested that this item in the Schedule be amended taking account of the following:

In the table within this section 'Ammoniacal Nitrogen' in the Parameter column has two notes attached. Note 5 refers to analysis using a Spectrophotometer. The frequency requested is 'daily'. It is requested that this note be added to with 'or alternative method as agreed with the Agency' to allow research be carried out into the cost and practical impacts of this method of analysis.