

# COMHAIRLE CONTAE PHORT LÁIRGE

Rannóg Comhshaoil  
Oifigi Cathartha  
Dún Garbhán  
Co. Phort Láirge

Tel. 058 20894  
Fax. 058 20889  
Email: [environmentinfo@waterfordcoco.ie](mailto:environmentinfo@waterfordcoco.ie)  
Web: [www.waterfordcoco.ie](http://www.waterfordcoco.ie)



# WATERFORD COUNTY COUNCIL

Environment Department  
Planning, Environment  
and Emergency Services Directorate

Civic Offices  
Dungarvan  
Co. Waterford

*Objection No. 1*

My Reference:  
Mo Thag:

Your Reference:  
Do Thag:

Date:  
Dáta: 25<sup>th</sup> April 2007

Environmental Protection Agency  
P.O. Box 3000  
Johnstown Castle Estate  
Wexford

Re: **Waterford County Council's Objection to Proposed Decision on Tramore Landfill  
WD0075-02 under Section 42 of Waste Management Acts 1996 – 2005.**

Dear Sirs,

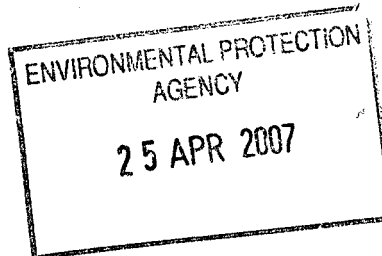
Please find attached one original and three copies of our objection referred to above. We also enclose objection fee in the amount of €500.00.

We trust you find same in order.

Yours faithfully,

  
James Mahsfeld  
Senior Executive Engineer  
Environment & Planning

*For inspection purposes only.  
Consent of copyright owner required for any other use.*



Encls.



## Tramore Landfill

# Objections to Proposed Decision for Waste Licence Reg. No. W0075-02

## DOCUMENT CONTROL SHEET

Client	Waterford County Council					
Project Title	Tramore Landfill					
Document Title	Objections to Proposed Decision for Waste Licence Reg. No. W0075-02					
Document No.	MDR0349Rp0011					
This Document Comprises	DCS	TOC	Text	List of Tables	List of Figures	No. of Appendices
	1	1				

Rev.	Status	Author(s)	Reviewed By	Approved By	Office of Origin	Issue Date
F01	Final Issue	Eleanor Boland	Larry O'Toole	Larry O'Toole	Carnegie House	24/04/07

**Consulting Engineers**

## TABLE OF CONTENTS

GROUNDS FOR OBJECTION .....	1
CONDITION 1.6 .....	1
CONDITION 2.1.2 .....	1
CONDITION 3.13.3 .....	1
CONDITION 3.15 .....	2
CONDITION 3.16 .....	2
CONDITION 5.8.1 .....	2
CONDITION 6 .....	3
CONDITION 6.22.1 .....	3
CONDITION 10.1.1 AND CONDITION 6.14.3 .....	3
CONDITION 10.2 .....	4
SCHEDULE E .....	4

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

**OBJECTION TO WASTE LICENCE PROPOSED DECISION W0075-02 UNDER  
SECTION 42 OF THE WASTE MANAGEMENT ACT, 1996 TO 2005.**

## **GROUNDS FOR OBJECTION**

Waterford County Council of Áras Brugha, Davitts Quay, Dungarvan, County Waterford, as operators of Tramore Landfill wish to object to certain conditions of the Proposed Decision on an application for a Waste Licence (Waste Licence Register No. W0075-02) issued by the Environmental Protection Agency on 29<sup>th</sup> March 2007.

The specific objections are set out in the following sections.

### **CONDITION 1.6**

With regard to Condition 1.6 of the Proposed Decision, it is requested that the Agency considers the addition of a third point with regard to hours for construction activities. It is requested that construction activities are allowed only during the hours of 07.30am to 8.00pm Monday to Saturday inclusive.

This additional condition is requested in order to take advantage of summer working hours at the site when weather conditions are more favourable for lining activities, i.e. rainfall is reduced to allow welding take place and wind is reduced to allow panels be placed. In addition working with clays and subsoils is considerably easier when material is drier during the summer months.

In addition there is no specific Hours of Operation for the facility outlined in the licence. It is requested that the Agency considers specifying the Hours of Operation as one hour either side of the Waste Acceptance Hours in order to allow site management prepare the site before the public enter each day.

### **CONDITION 2.1.2**

With regard to Condition 2.1.2 of the Proposed Decision, it is requested that the Agency considers amending the specific training requirements for the facility manager's deputy position. Tramore is now operated as a Civic Waste Facility and is no longer operational as a Landfill. Waterford County Council employ two deputies who both have completed the 2-day FAS Waste Facility Operative Course as opposed to the complete FAS waste management training programme.

It is requested that the Agency considers amending this condition to reflect the reduced training requirements for deputies in charge of the Civic Waste Facility as opposed to a Landfill.

During the restoration of the Landfill a Resident Engineer is on site to supervise these works.

### **CONDITION 3.13.3**

With regard to Condition 3.13.3 of the Proposed Decision, it is requested that the Agency considers amending the requirement for an impermeable concrete surface at the civic waste facility. There is an impermeable concrete surface under the green waste composting facility and there are concrete slabs under the containers in the civic waste facility. Over the remaining area there is hardcore overlaid with tarmacadam.

It is requested that the Agency amend the condition to reflect the satisfactory surfaces that are in existence at the site.

### CONDITION 3.15

With regard to Condition 3.15 of the Proposed Decision, it is requested that the Agency considers amending the requirement to have Waste Inspection and Quarantine areas, which are hardstanding and drain to the leachate management system. Tramore Landfill now operates as a Civic Waste Facility and no landfilling has taken place since December 2005. In the future the Civic Waste Facility will include a composting facility. The intake of waste will primarily be household dry recyclables and arrive to site in private vehicles, the site is also fully supervised. Green waste will be inspected as a matter of course before being shredded at the composting slab. It is requested that the Agency consider removing this condition.

### CONDITION 3.16

With regard to Condition 3.16 of the Proposed Decision, it is requested that the Agency considers amending the specific requirement for a wheel wash and that all water from the wheel cleaning area be directed to the leachate management system. At present the wheelwash is used to clean the vehicles leaving the landfill restoration works, and the prime function is to remove soils from the wheels of the haulage vehicles. This is principally for the safe management of neighbouring road surfaces during the works. The water at the wheelwash is discharged to the surface water system since the vehicles do not encounter waste at the works. When the restoration works are complete, the only regular HGV's that enter the site will be those to collect containers of dry recyclables. The wheelwash will remain in place as long as it is required from a construction/ safe road surface management perspective.

It is requested that the Agency remove the requirement for the Wheelwash and its connection to the leachate management system since HGV's will not be in direct contact with the waste after the restoration works are complete.

### CONDITION 5.8.1

With respect to Condition 5.8.1 of the Proposed Decision, with regard to obtaining an agreement with a WWTP to remove and treat the leachate collected at Tramore Landfill, it is requested that the Agency amend the wording and extend the stated period of three months to nine months. The reason for these requests is as follows:

Amend the wording: An agreement will be made with a WWTP to accept and treat leachate from the landfill site. A separate agreement will most likely be made with a haulage company for the removal of the leachate from the site.

Extend the stated period: The leachate investigation study is still underway and no conclusions have yet been drawn from the monitoring results to allow for an informed decision to be made on quantities and rates of leachate to be extracted, therefore the licensee could not enter into negotiations with the local WWTP without knowledge of predicted volumes that are required to be treated. Combined gas and leachate extraction boreholes were constructed at the landfill over the winter period (2006 –2007) and on-going dipping of these boreholes is taking place to build up a body of information. In addition automatic water level monitors are being positioned in a selection of the boreholes to further examine which wells are subject to tidal influences and which ones are suitable for leachate removal. These investigations are being carried out while the site is being capped and it is predicted that useful information will be retrieved after a period of three months. To allow final design of the leachate

extraction system and pumping regimes to take place and agreements to be made with the WWTP's it is requested that the Agency consider a nine-month period from grant of licence.

## CONDITION 6

With respect to Condition 6 it is requested that the Agency consider the letter from WCC to the Agency dated 8<sup>th</sup> September 2006, the text of which is provided here in Appendix A. The landfill is now moving to the aftercare phase and a reduction in monitoring frequencies is requested to be considered.

### CONDITION 6.22.1

With respect to Condition 6.22.1 of the Proposed Decision, with regard to a review of all leachate and groundwater boreholes at the site, it is requested that the Agency extend the stated period for receipt of this report from two months to six months.

Extend the stated period: A proposal is being prepared at present for the installation of a new upgradient groundwater borehole and will be submitted to the Agency within the next two weeks. After that period a drilling contractor must be employed and the well constructed. The capping works are underway at the moment on the site and a number of the monitoring points will be established once these works are nearing completion (i.e. surface water monitoring locations) It is requested that the Agency consider extending this period from two months to six months to allow a more comprehensive report which is applicable to the long-term to be prepared.

### CONDITION 10.1.1 AND CONDITION 6.14.3

Condition 10.1.1. requires that the restoration of the landfill facility be completed within two years of the final cessation of waste being deposited at the landfill. Condition 6.14.3 requires that filled cells shall be permanently capped within eighteen months of the cells having been filled to the required level. It is requested that the Agency extend the stated period for both of these conditions to three years. (31<sup>st</sup> December 2008)

Extend the stated period: Landfilling operations ceased at the site on the 31<sup>st</sup> December 2005. Active work has taken place on the site since then in order to prepare the site and make it suitable for final capping. Subsoil and topsoil material has been actively sought and imported where available since October 2006. A lining contractor is on site at present installing the capping system which is covered with the imported subsoil and topsoil as the lining progresses.

Cover material has proved difficult to source in the Tramore area since over the past few seasons capping works have been taking place at Kilbarry landfill in Waterford City and material has not been available for import at Tramore. Waterford City Council have almost completed the capping works at Kilbarry and as a result during the month of March a total of 58,700 tonnes of subsoil was brought to site. This vast increase in the quantity of subsoil being drawn into Tramore landfill was due to new developments commencing in the Waterford City area and the Kilbarry Landfill fully closing for a number of days. This brings the total quantity of cover material on site to over 112,000T. Approximately 218,000T of subsoil / topsoil material is required in total to cover the site.

The lining works will continue over the summer months and are due to be complete by October / November 2007, please note that this timeline is weather dependent since the lining works are very susceptible to weather conditions on such an exposed site. A minimum of 300mm cover is being placed over the geo-composite lining system at present and this will be increased to 1m over the landfill body as the material becomes more available. While this material is being actively pursued it is

not always readily available in the locality and as a consequence it is requested that the Agency consider extending the stated period for both these conditions to three years.

## CONDITION 10.2

It is requested that the references to the landscaping proposals and drawings made in Condition 10.2 be amended to reflect recent submissions made to the EPA.

Reference to landscaping proposals: On the 4<sup>th</sup> October 2005 copies of the Revised Restoration and Aftercare Plan were forwarded to the EPA. The landscaping proposals for the site at Tramore are given in Section 3 of this report. It is proposed that the Agency consider revising the reference to the landscaping proposals contained within the original waste licence application (dated Nov. 2000) to the proposals contained within the Plan described here (Oct. 2005).

Reference to drawing: On the 10<sup>th</sup> May 2006 three copies of a Visual Impact Assessment were forwarded to the EPA. This report contained a drawing with contours, which had a reference no. Fig. MDR0349Mi0005F01. These contours reflect the final contours for the site and include for 1m lift of subsoil / topsoil over the geocomposite capping layers. It is proposed that the Agency consider revising the reference to the drawing contained within the original waste licence application (dated Nov. 2000) to the drawing described here (May 2006).

## SCHEDULE E

It is requested that the Agency considers amending the table contained within Schedule E – Reporting.

The table provided in Schedule E requires that the following reports are submitted ten days after end of the quarter being reported on.

- Monitoring of landfill gas
- Monitoring of Surface Water Quality
- Monitoring of Groundwater Quality
- Monitoring of Leachate

It is requested that the Agency amend this submission date to read 'Within ten days of obtaining results' to allow for processing and reporting of the samples take place.

**Appendix A**  
**Previous Letter to EPA**

*For inspection purposes only.  
Consent of copyright owner required for any other use.*



Mr John Mc Entagart,  
Regional Inspector  
Office of Environmental Enforcement  
Environmental Protection Agency  
P.O. Box 3000  
Johnstown Castle Estate  
Co. Wexford

08 September 2006.

**Re: Landfill Environmental Monitoring in respect of Dungarvan Landfill Ref. 32 – 2 & Tramore Landfill Ref 75-1.**

A Chara,

I refer to the Environmental Monitoring programme currently being carried out by Waterford County Council in respect of the above mentioned landfills and would be obliged to receive your approval to the changing of that programme to reflect a frequency of monitoring suited to an aftercare programme.

The following table indicates the proposed aftercare monitoring programme for Tramore and Dungarvan landfills and is compiled based on the *EPA Landfill Monitoring Manual*.

Proposed aftercare monitoring programme for Tramore and Dungarvan landfills.

Table below compiled based on *EPA Landfill Monitoring Manual*.

<b>Monitoring parameter</b>	<b>Existing</b>	<b>Aftercare</b>
Surface water composition	Quarterly	Six monthly
Groundwater levels	Monthly	Quarterly
Groundwater composition	Quarterly	Six monthly
Landfill Gas emissions	Monthly	Six monthly (Boreholes) Maintain weekly testing in site buildings
Leachate levels	Weekly/Monthly	Quarterly
Leachate composition	Quarterly	Six monthly
Noise	Site specific	Annually while waste transfer and recycling in operation
Dust	Site specific	Annually while waste transfer and recycling in operation
Biological survey	Annual	2 yearly
Toxicity testing on leachate	Annual	2 yearly

It is proposed to commence this aftercare monitoring programme in 2007.

Your observations and comments in relation to this proposal are requested.

Mise le meas,

\_\_\_\_\_  
Mr D Mc Carthy,  
Director of Services,  
Planning, Environment & Emergency Services