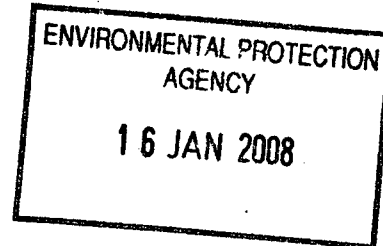


11th January, 2008

Ref: LC-125-ED

Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford.



Attn: Dr Jonathan Derham

Re: Dunmore Landfill Waste Licence No. W0030-02
Condition 1.5.3

Dear Jonathan,

I refer to condition 1.5.3 of Dunmore Waste Licence which states:

“Only commercial and industrial waste, not including foodstuffs, may be deposited in Cell 14.”

Kilkenny County Council wishes to apply for a relaxation of this licence condition to allow mixed municipal waste to be deposited in Cell 14. Dunmore Landfill is the only landfill facility (public or private) in County Kilkenny and there are no plans to replace it. Future waste disposal will be undertaken on a regional basis, in accordance with the Joint Waste Management Plan for the South East Region.

Waste disposal operations are currently taking place in both remaining cells with mixed municipal waste being deposited in Cell 13 and commercial / industrial waste not containing foodstuffs being deposited in Cell 14. This dual operation has been necessary in order to try and maximise the lifespan of Cell 13. The remaining capacity of Cell 13 will allow disposal for approximately 3 – 4 months, after which municipal waste containing foodstuffs will have to be transported out of the county. It has proven difficult operationally to segregate the waste on site into the two cells as even a small amount of organic waste contamination in a load can lead to a non compliance with the condition.

It is of strategic importance to the County that the limited remaining landfill capacity is efficiently and effectively used. As the quantity of commercial and industrial waste (not including foodstuffs) brought to Dunmore Landfill is substantially smaller than that containing foodstuffs, at current filling rates Cell 14 will continue to operate for several years after Cell 13 is full. The economic viability of this situation is questionable and may leave Kilkenny County Council with no option but to reconsider filling Cell 14.

The dual cell operation has resulted in two waste faces operating simultaneously, thereby doubling the area of exposed waste. Removing the waste restriction would result in only one waste face in operation at any time, thus reducing any possible potential nuisances associated with the exposed waste faces.

The area of uncapped waste in the remaining cells has doubled due to the restriction placed on Cell 14 as the two cells are operating at the same time. The duration of the life span of the cells operating simultaneously will be considerably longer than operating on a phased basis with no restriction and thus the cell areas will remain uncapped for longer until both cells reach their final fill levels.


Although Cells 13 and 14 are separately named, the construction of the cells is such that they are basically one cell with an intermediate permeable bund. The leachate and gas collection systems in the two cells are fully interconnected. Mixing of leachate occurs both within the cells and at the leachate lagoon. Mixing of gas between both cells also occurs prior to and during collection. In addition the waste from Cells 13 and 14 connects at the two waste faces along their boundary.

To comply with the Joint Waste Management Plan for the South East Region, all domestic waste in County Kilkenny is required to be segregated into three fractions from 1st January 2009. This will result in a significant reduction in the amount of foodstuffs contained within the mixed municipal waste being brought to Dunmore from that date as most organic waste will be separately collected for biological treatment.

In the context of the above considerations and to ensure that the remaining life span of Dunmore Landfill is utilised to its greatest effectiveness, Kilkenny County Council would like to request that an amendment to condition 1.5.3. of waste licence W0030-02 be favourably considered.

Kilkenny County Council is confident that the relaxation of the condition will not lead to any increase in nuisance for neighbouring dwellings and will rather lead to a more orderly operation of the landfill.

Yours sincerely,


Simon Walton
Senior Engineer
Environment