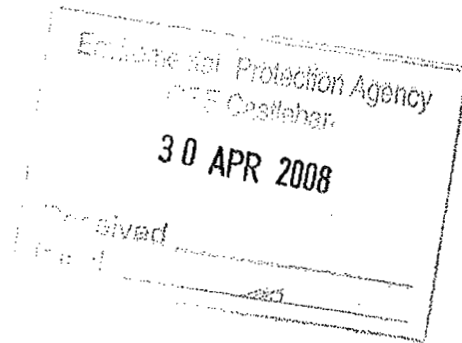




COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

29th April 2008

Dr Michael Henry
Office of Environmental Enforcement
Regional Inspectorate
Environmental Protection Agency
John Moore Road
Castlebar
Co. Mayo



Re: Application for technical amendment of condition Number 5.5(b) of Waste Licence W0109-01 – Central Waste Management Facility, Ballyduff Beg, Inagh, Co. Clare

Dear Dr Henry,

Condition Number 5.5(b) of Licence Number W0109-01 states:

'The working face of the landfill shall be no more than 2.5 metres in height after compaction, no more than 25 metres wide and 25 metres in length and have a slope no greater than 1 in 3...'

In Clare County Council's opinion this condition lacks clarity. It specifies the maximum length of the working face in two dimensions at right angles, and it can be interpreted as allowing a maximum area for the working face of 625 square metres. It is conceivable therefore that the Council could be in breach of the licence, and subject to the issue of a non-compliance notice, for having one of the dimensions greater than 25 metres while having the surface area less than 625 square metres. To put it another way, a working face of say 50 metres long by 6 metres wide, area 300 square metres, could be non-compliant whereas a working face of say 24 metres long by 24 metres long, with an area of 576 square metres, would be compliant.

The purpose of having maximum limits on the area of the working face is to minimise nuisances associated with the activity such as birds, vermin, odour and litter. A situation where a smaller area could be non-compliant while a larger area is compliant cannot, in the Council's opinion, be consonant with the purpose and spirit of this condition.

Clare County Council's operational practices at the Ballyduff Beg landfill are such that a long relatively narrow working face is more practical than a relatively square face. Cells are rectangular in shape but quite narrow, which prompts the use of a relatively narrow working face. Each cell is operated with only one entrance for the deposition of waste, which means the waste must be moved from the front of the cell to its final position by means of a steel wheel

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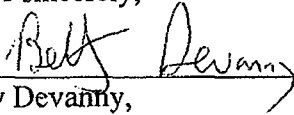
compactor. A relatively narrow working face ensures that there is always more area within the active cell protected by daily cover. With a narrow working face the steel wheel compactor must travel on the same area all day. This produces more compaction, reduces the probability of formation of voids and occurrence of wind blown litter, minimises landfill odours, and helps to prevent pest damage within the active cell.

Clare County Council requests that the condition be amended to provide for a maximum area of 625 square metres for the working face, and to omit reference to individual dimensions. In this way there can be no ambiguity in regard to what is and is not compliant.

Should the EPA consider that a meeting is necessary to discuss this request, we would welcome such a meeting whether at the facility or at another venue.

Should you require any further information or assistance, please do not hesitate to contact Sean Ward at 065-6846294.

Yours sincerely,



Betty Devanny,
Administrative Officer,
Environment and Emergency Services Directorate.

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