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Rec'd 23/10/08
Jc.

For the attention of Environmental Protection Agency

Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
County Wexford

23rd October 2008

Our Ref: IBL0266
File Ref: IBL0266 - D1

Dear Sir/Madam

RE - BALLYNACARRICK LANDFILL SITE, CO. DONEGAL W0024-03

Further to your letter dated 26th September 2008 regarding the Proposed Decision for the Review of Waste Licence for Ballynacarrick Landfill site (Ref W0024-03) please find enclosed on behalf of Donegal County Council an objection to a number of the Conditions in the licence in accordance with Section 42 of the Waste Management Act 1996 to 2008.

One copy of the objection is included as required. Credit Card details for the appropriate fee of €500 as per Article 44 have been provided by telephone.

We trust this is in order, however if you have any further queries please do not hesitate to contact us.

Yours sincerely

PP Anne Jones

Donal Doyle
For RPS

Encl.

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WASTE LICENCE APPLICATION REF W0024-03
OBJECTION TO THE PROPOSED LICENCE CONDITIONS

BY

DONEGAL COUNTY COUNCIL
COUNTY HOUSE
LIFFORD
CO DONEGAL

Donegal County Council submitted a review application for a Waste Licence for a landfill site in Ballynacarrick in December 2007 in accordance with Waste Management Act, 1996.

A Proposed Decision was issued on 26th September, 2008. In accordance with Section 42 of the Waste Management Acts, 1996 to 2008, any person may object to the proposed decision at any time no later than 23rd October 2008.

This objection has been formulated to reflect concerns of Donegal County Council in relation to a number of conditions in the proposed decision for Ballynacarrick Landfill Site.

Specific objections together with the grounds for objection are referred to in this document as referenced in the proposed decision.

Condition 3 Infrastructure and Operation

3.29 The licensee shall provide and maintain a Wastewater Treatment plant at the facility for the treatment of sanitary effluent, as well as drainage from the truck wash, ramp and weighbridge areas. Any percolation area shall satisfy the criteria set out in the Wastewater Treatment Manual, Treatment Systems for Single Houses, published by the Environmental Protection Agency.

Ballynacarrick Landfill Site - Existing Infrastructure.

The sewerage from the toilet block is dealt with by a Klargester BioDisc BC treatment system installed in October 2007. The effluent from this system is collected in a sump and pumped to leachate collection system. The water from the existing wheelwash on site is recirculated through the wash process. The water settles in a tank adjacent to the wheelwash and from here the settled sludges can be pumped directly to the leachate tank.

The surface water from the site roads including the weighbridge area is directed to gullies and passes through an oil interceptor prior to discharging to an area to the east of the existing site. We would not consider the surface water from the hard standing roads to differ from the surface water on the existing weighbridge and would not consider any amendments to the surface water collection at the weighbridge to be necessary.

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Condition 6 Odour Control

6.6.1 Unless otherwise agreed in writing, leachate holding tanks/lagoons/sumps shall be effectively sealed, and headspace gases from the treatment holding tanks shall be vented to an appropriate odour abatement system prior to release to atmosphere.

Ballynacarrick Landfill Site has not had an odour problem from leachate treatment system. A surface aerator (45KW) aerates the leachate within the 1,000m³ treatment tank (20.5m diameter). We would consider the installation of the sealed roof as an unnecessary requirement for the site. Alternative covering systems for the aerators may be considered appropriate and will be further investigated by Donegal County Council

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Condition 8

8.1 Waste Acceptance and Characterisation Procedures

8.1.1 Only residual waste that has been subject to adequate pre-treatment is permitted to be accepted for disposal at the landfill facility after 16th July 2009.

(i) Treatment shall, as a minimum, reflect any published EPA guidance.

(ii) This requirement may, subject to the agreement of the Agency, not apply to: inert wastes for which treatment is not technically feasible; other waste for which such treatment does not contribute to the objectives of the Landfill Directive as set out in Article 1 of the Directive by reducing the quantity of the waste or the hazards to human health or the environment.

8.1.2 For Biodegradable Municipal Waste (BMW) the following pre-treatment requirements must be demonstrated:-

(1) By 1st January 2010 a minimum of 50% of all BMW accepted at the facility shall be biologically pre-treated (including diversion).

(ii) By 1st January 2013 a minimum of 70% of all BMW accepted at the facility shall be biologically pre-treated (including diversion).

(iii) By 1st January 2016 a minimum of 90% of all BMW accepted at the facility shall be biologically pre-treated (including diversion).

8.1.3 Stabilised waste accepted at the facility must achieve a biological stability standard published, or agreed, by the EPA.

The Donegal Waste Management Plan set out a series of actions for the 5 year period including the provision of civic amenity sites, bring sites, home composting and kerbside collection systems. The plan also noted that to comply with the 2010 landfill diversion targets there will be a need in County Donegal for access to alternative waste management technologies e.g. MBT, Energy Recovery. Due to economies of scale such facilities are unlikely to be located in County Donegal and some waste from the County is likely to be transported to adjacent planning regions to access these alternative technologies e.g. North West Region Waste Management Group.

Condition 8.1.1 (i) states that "Treatment shall, as a minimum, reflect any published EPA guidance". The Municipal Solid Waste – Pre-treatment and Solid Waste Management, An EPA Technical Guidance Document Consultation Draft September 2008 states that for urban areas, treatment of 'black bin' or mixed municipal waste by mechanical means is also expected. Condition 8.1.2 requires pre-treatment for Biodegradable Municipal Waste (BMW) to be demonstrated.

To date the infrastructure necessary for the treatment of 'black bin' or mixed municipal waste by mechanical means and to biologically pre treat waste to comply with Condition 8.1.1 and 8.1.2 is not available within the County or access to facilities outside the County. Given the timescales for the statutory processes and subsequent construction period it is not viable to deliver this necessary infrastructure prior to the anticipated closure date for Ballynacarrick (late 2010).

We would further note that the requirement for treatment of 'black bin' or mixed municipal waste by mechanical means for urban areas and the targets set out in Condition 8.1.2 was first published in the Consultation Document, Municipal Solid Waste – Pre-treatment and Solid Waste Management, An EPA Technical Guidance Document Consultation Draft September 2008, this has not allowed for adequate planning for these particular requirements.

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C.1.2 Monitoring of Emissions to Air Flare Stacks & Generation Plant

The proposed decision includes the requirement to measure Residence Time of the flare on a quarterly basis. The flare at Ballynacarrick was installed in 2005 and was designed to comply with licence conditions at that time i.e. W0024-02. The retention time is a design calculation and cannot be measured in situ and we would request that this requirement is removed from for the Final Licence.

C.1.3 Monitoring of Landfill Gas Emissions

There are a number of existing piezometers located in waste at the facility (LG1, LG2, LG4, LG5, and LG6). These monitoring points are located in the old unengineered areas of the site. The remaining piezometers are located around the perimeter of the entire licensed boundary (LG8 to LG17) as shown on Drawing IBL0266 submitted with the Waste Licence Application. Landfill gas within the engineered cells is monitored from the gas extraction system at the respective manifolds. These results will be reported in future Quarterly and Annual reports for the facility. Donegal County Council does not propose to install piezometers in cells especially for landfill gas monitoring but will continue to monitor gas from the gas extraction system.

C.1.5 Control of Leachate Treatment

Table C.1.5 makes reference to three surface aerators. There is only one surface aerator at Ballynacarrick landfill site. No further aerators are currently required.

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