

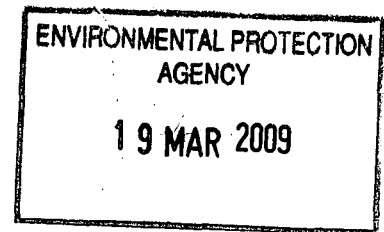


Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

HSE-Southern Region  
South Lee Environmental Health Dept.  
Father Matthew Quay  
Cork

Tel: 021-4927703  
Fax: 021-4927704

Office of Climate, Licensing and Resource Use  
Environmental Protection Agency  
Headquarters  
PO Box 3000  
Johnstown Castle Estate  
County Wexford



18<sup>th</sup> March 2009

**RE: Review of Waste Licence for Kinsale Road Landfill Waste  
Transfer submitted by Cork City Council**

**Reg No: W0012-03**

To Whom It May Concern:

I refer to the recent correspondence relating to the above proposed licence application and subsequent request by the EPA for a submission from the HSE. The application is for a review of the current Waste License (W0012-02). It appears from the waste license application that an Environmental Impact Assessment is not required.

The location of the facility is in the townlands of Ballyphehane, Curraghconway and Inisarsfield just off the South Link Road in Cork City. The existing development consists of unlined cells. The maximum capacity under the current license (W0012-02) is 100,000 tonnes per annum. The proposed development is for a Transfer Station which will have a maximum capacity for 22,000 tonnes per annum. The waste will comprise of non-hazardous household and commercial waste only from the Cork City Council area.

It is envisaged that there would be some public health concerns that the Environmental Health Service (EHS) would like to comment on. We have examined the Non-Technical Summary and the attachments Part 1 and 2 as available on [www.epa.ie/licensing](http://www.epa.ie/licensing) and set out some observations below.

#### **Environmental Nuisances:**

The section in the report regarding environmental nuisances refer to birds, flies, fire, dust and litter. Mitigative measures are included for these. However pests are not addressed.

The operation of a transfer station has the potential to pose a serious risk of infestation of pests such as rats and mice. This is a serious public health issue. Mitigation measures should include a pest control plan with detailed inspections of the site regularly. It is also

imperative that good construction and operation practises be employed to ensure that the area is managed well so that it would not attract rodents.

#### **Air Emissions:**

Potential air emissions include odour, Methane, Carbon Dioxide, landfill gas.

There will be one point emission source to the atmosphere via the activated carbon filtering system.

In relation to odour control, the building will be operated on negative pressure. Also waste will be tipped within the transfer station only when the doors are closed.

There is an existing landfill gas management plan at the landfill facility however, under this license review application: landfill gas management is not applicable to the waste transfer station development. The proposed waste transfer building will be fitted with a gas detector in order to detect landfill gas infiltration.

Monitoring of all the emissions will be continued under the reviewed licence.

#### **Emissions to Surface Water:**

Leachate generated within the proposed waste transfer building will be connected to the existing leachate management system at the landfill facility. Under this plan the leachate is discharged to the Tramore Valley sewer for treatment at Carrigrennan waste water treatment plant.

It states in the application to the EPA that there will be no direct discharges to water.

#### **Decommissioning Current Landfill Site:**

An attachment is provided for the remediation, decommissioning, restoration and after care of the proposed transfer station. However, there is no information regarding the decommissioning of the current landfill site which consists of unlined cells. Details of the aftercare management plan should be made available with this application as it is of interest to public health. This management plan should include information pertaining to:

- Waste – how the treatment and covering will take place
- Environmental nuisances – including rodents, flies and dust
- Obsolete equipment
- Any buildings which will be obsolete
- Groundwater contamination
- Land contamination

If you have any queries with regard to this submission, please contact the undersigned.

Yours sincerely,

*Dr. Monica Jones*

Declan Hamilton

Principal Environmental Health Officer

c.c. Ms. Mary Keane, Area Chief Environmental Health Officer, Environmental Health/Population Health, HSE, Mill Lane, Palmerstown, Dublin 22

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