COMHAIRLE CHONTAE Gort an Droma Líonadh Baile Dhá Thuile, Co. Luimnigh.		LIMERICK COUNTY COUNCIL Gortadroma Landfill, Ballyhahill, Co. Limerick.
	Real Address of the second	Tel.: $069 - 82339$ Fax.: $069 - 82350$
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Licence Name:	Gortadroma Landfill Site, Limerick County Council	ONNE TAL
Licence Register:	W0017-03	18 ACENCL PROTECTION
Licence Condition:	N/A	
FAO:	Mr. Brian Meaney	
Prepared By:	John O Carroll	
Submission:	Review of Licence Register W	/0017-03
Date:	15 th July 2009	
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Limerick County Council wish to make a submission in relation to the following conditions of waste licence register number W0017-03.

Licence condition 3.24.2 c:

'A minimum of three leachate level monitoring points in cell 11 and all future constructed cells;

We request this condition be amended to state the following;

A minimum of two leachate levels monitoring points in all future constructed cells and a minimum of one leachate level monitoring point at the collection location of each fully restored cell.

Reason:

Each landfill cell at Gortadroma Landfill is designed to drain to one low point for collection and abstraction. Provide the leachate level is less than 1 meter at the collection point the level of leachate will always be lower in other areas of the cell.

Leachate level monitor sumps are also difficult to construct during the filling of waste and also contribute to gas and odour emissions as they are difficult to seal.

Copy: Tom Tarpey, Senior Engineer.

Condition 6.21:

'A stability assessment of the side slopes of the facility shall be carried out annually.

We request this condition be amended to state the following;

The side slopes of the facility shall be visually inspected weekly and observations recorded in the weekly site inspection report.

Reason:

Limerick County Council consider it much more prudent to inspect side slopes on a weekly basis and to carry out repairs if necessary on an on going basis rather than to conduct an annual inspection.

Condition 1.2:

'Activities at this facility shall be limited as set out in Schedule A: Limitations of this licence.

Table A.2 lists quantities and categories of waste to be accepted for disposal and recovery at Gortadroma Landfill.

Limerick County Council wish to amend the categories of waste accepted for disposal at the Gortadroma Landfill Site.

Sludges are no longer accepted at Gortadroma as per licence condition 8.2.9 and this category can be removed from the table.

The quantity of household and commercial waste accepted can be variable. We request that the categories and quantities of waste accepted be amended as follows;

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Waste Type	Maximum(tonnes per annum)
Mixed Municipal Waste (Household and Commercial)	130,000

<u>Reason:</u>

To ensure there that we have the flexibility to meet the variable demand for disposal of household and commercial waste at the Gortadroma Landfill.

Condition 5.1:

'No specified emission from the facility shall exceed the emission limit values set out in Schedule B: Emission Limits of this licence. There shall be no other emissions of environmental significance'.

Copy: Tom Tarpey, Senior Engineer.

Table B4 shows emission limits for pH, BOD, COD, Suspended Solids and Total Ammonia (as N) for leachate tankered off site to Limerick County Council waste water treatment plants.

We request that the emission limits for leachate tankered off-site be removed from the licence.

<u>Reason:</u>

There is an on site leachate treatment plant at Gortadroma Landfill. During periods of heavy rainfall the on site treatment plant may not be capable of treating the quantity of leachate generated and therefore the excess leachate has to be tankered off site to comply with licence conditions 6.12.1 and 6.12.3.

Condition 5.1:

'No specified emission from the facility shall exceed the emission limit values set out in Schedule B: Emission Limits of this licence. There shall be no other emissions of environmental significance'.

Limerick County Council wish to amend Schedule B.3, Emission limits for treated leachate discharge to surface water in order to increase the daily discharge volume to 140 m³ per day. Therefore Schedule B3 should read as follows;

Emission Point Reference No: Volume to be emitted:

Time of emissions:

Treated Leachate Discharge Point Maximum in any one day: 140m³/day Maximum rate per hour: 5.83 m³ No discharge below a river flow in the White River of 65 l/s and must be greater than 40 Dilutions of effluent at all times.

Reason:

The storage capacity of the treated leachate lagoon at Gortadroma is approximately 1000 m^3 , which is equivalent to 8 days storage. During periods of wet weather the flow in the White River would be in excess of 65 l/s and an increase in discharge volume would increase available storage capacity for drier periods and therefore reduce the need to tanker treated leachate off-site.

Signed: John O'Carrol John O Carroll, Landfill Manager.

Copy: Tom Tarpey, Senior Engineer.

