

COMHAIRLE CONTAE ROS COMÁIN Roscommon County Council

TEACH NA CÚIRTE ROS COMÁIN

Teil: 090-6632500 Faics: 090-6637108

C O U R T H O U S E R O S C O M M O N

Tel: 090-6632500 Fax: 090-6637108

Brian Meaney,
Senior Scientific Officer,
Environmental Licensing Programme
EPA,

PO Box 3000,

Johnstown Castle Estate,

Co: Wexford

O SCHOLAGO SUD APPSUD

17th July 2009.

Re: Review of Licence Register Number W0059-02, Ballaghaderreen Landfill.

A Chara,

I refer to your letter of the 18th June 2009 regarding the above matter. I welcome the opportunity to make a submission on behalf of Roscommon County Council relating to the licence review as follows;

The refuse collection service in the Roscommon County Council administrative area is carried out by the private sector on the basis of a two bin collection system. There is no facility currently operating in the area whereby Mechanical Biological Treatment of residual municipal waste can take place. We are aware that Barna Waste Ltd, who operate a refuse collection service in the Roscommon area, is in the process of seeking clearance from the DAFF for the operation of such a facility. It would be the view of the Council that until such a facility is available in the area that it would be premature to amend the landfill licence to prohibit the acceptance of untreated municipal waste. Roscommon County Council accepts that there is a need for pre-treatment of waste prior to deposit to landfill but is concerned about the implications for waste that will be collected in the area prior to the availability of a pre-treatment facility.

You are more than likely aware of the remaining lifespan of the Ballaghaderreen Landfill facility which has a remaining capacity of circa 60,000 tonnes. It would be the intention of Roscommon County Council to continue to operate this landfill in compliance with the licence but to also complete the filling of the available space and capping of same within a reasonable timeframe. This will assist in the early management of gas, leachate etc. and the aftercare of the landfill. The proposed amendment of the licence will push out the timeframe involved in this whole process of closure and management of the closed site.

Roscommon County Council has carried out substantial works relating to the overall infrastructure of the site including capping works, gas management system, leachate management, and other aspects of the management of the facility in order to reduce the impact of the facility. We would be anxious to continue filling the site in the current fashion to bring about closure of the site and consequent finalisation of management of possible risks and nuisances.

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We also note that it is proposed to look at new conditions relating to odour prevention and control. The Council has brought about, through considerable investment in the facility, a great improvement in the management of odours in and around the facility. This has been achieved in close co-operation and consultation with your organisation. I would ask that this would be noted when considering this aspect of the licence review. I would also ask that the remaining capacity and possible life-span of the facility would be borne in mind when considering this aspect of the licence. Roscommon County Council would also like to see a greater emphasis on training of all staff in odour management and detection in the proposed new conditions, both for regulator and operator.

I would like to take this opportunity again to request a meeting with the senior inspectors of the regional EPA office to discuss the practical implications of the review of the landfill licence and any proposed methodology for enforcement of the new conditions of the licence. Roscommon County Council wishes to continue to be compliant with our licence conditions and this can only be achieved by continued communication between all parties involved.

If you have any query regarding the content of this submission please contact the undersigned at 09066 37332, 087 6502917, or by e-mail at pmurtagh@roscommoncoco.ie.

Mise, le meas,

Pat Murtagh,

Senior Executive Officer, Environment Section.

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