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Feidhmeannacht na Seirbhíse Sláinte
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ENVIRONMENTAL PROTECTION
AGENCY
21 AUG 2009

18.08.09. cr

Mr. Brian Meaney
Office of Climate, Licensing & Resource Use.
EPA
Johnstown Castle Estate
Co. Wexford

Re: Waste Management Acts 1996 -2008
Review of Licence Register W0017-03

Name of Facility: Gortandroma Landfill Site, Ballyhahill, Co. Limerick.
Licencee: Limerick County Council.

Dear Sir,

I have been requested by Ms. Mary Keane, Area Chief Environmental Health Officer to forward you a copy of attached report for your information.

Yours sincerely

Annette Fitzgerald
Principal Environmental Health Officer.
Brian Meaney re Gortandroma Landfill 18.08.09 cr

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive



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27/07/09

**Ms. Annette Fitzgerald,
Principal Environmental Health Officer,
Health Service Executive,
Ashbourne Business Park,
Dock Road, Limerick.**

**Re: Waste Management Acts, 1996 – 2008.
Review of Licence Register W0017-03.**

**Licence Name: Gortadroma Landfill Site,
Limerick County Council!**

Dear Madam,

I am in receipt of correspondence submitted to Population Health directorate from Environmental Protection Agency detailing a review of all existing landfill licences as per the attached list. Comments have been requested from Environmental Health Service Limerick in respect of review of the Waste Licence granted to Limerick County Council in respect of Gortadroma landfill facility. There is no accompanying documentation but regard is had for submission made by Limerick County Council to EPA requesting review/removal of specific environmental conditions relating to the Licence Register W0017-10 granted to the Local Authority. In this regard I would advise that this office submitted detailed evaluation and comment on the previous Waste Licence application to EPA as well as issuing comment on the Licence determination on 11/05/2005. The view of this office was that the twelve conditions as specified under the terms of such Licence set out strict conditions and imposed comprehensive controls to ensure that the operation and management of the Landfill facility did not cause environmental pollution or generate nuisance.

The current review as instigated by EPA, is predicated on the basis that the current licence (and conditions therein) is in place for past four years and a recognition that some of the environmental limits, controls and obligations placed on Limerick County Council in respect of operation, management and monitoring of the facility may no longer be relevant or appropriate in the context of current on site operations. Accordingly, as pointed out in e-mail correspondence from Ms. Mary Keane, A/CEHO, it is a fairly narrow review, focusing on waste acceptance, limits to that acceptance and odour problems.

I wish to confirm that I have examined the proposal submitted by Limerick County Council setting out the rationale for seeking review of certain specified conditions incorporated into

the existing licence. I have also visited the site and spoken with John O'Carroll, Landfill Manager.

The site is currently licensed to manage an annual waste intake of 130,000 tonnes. A comprehensive leachate collection, landfill gas and surface water management infrastructure has been put in place on site in accordance with EPA licence conditions. On site, cell 15 is currently being filled. Cells 1 – 13 have been fully capped. Approximately 60-70% of the capped cell surface has been grassed. From a visual perspective the impact of the landfill on the surrounding environment has significantly improved. Cell No. 14 has been temporarily capped pending further settlement and compaction. Cells 5 – 15 are fully lined in accordance with EPA guidelines and leachate is collected and pumped from these to the on-site leachate treatment plant. Because the original cells (pre-licensing) are un-lined, Limerick County Council have installed a cement bentonite cut-off wall to prevent leachate flowing horizontally from the cells and a leachate abstraction system is in place to ensure that all aqueous discharges from in and around cells 1 – 4 are diverted to the leachate treatment plant. Licence condition 3.24.2c specifies "a minimum of three leachate level monitoring points in cell 11 and all future constructed cells".

Limerick County Council have requested amendment to this condition and are seeking a minimum of two leachate level 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. Mr. O'Carroll pointed out that leachate level monitor sumps are very difficult to construct during the filling of waste and also contribute to gas and odour emissions as they are difficult to seal. He also pointed out that each landfill cell at Gortadroma is designed to drain to one low point for collection and abstraction and that the level of leachate will always be lower in other areas of the cell.

Condition 6.21 specifies that a stability assessment of the side slopes of the facility shall be carried out annually. This requires the Council to employ an Environmental Consultant at a significant cost to undertake a visual inspection. As part of the management regime within the facility the sides, slopes and exposed flanks of the landfill are visually inspected weekly and observations recorded in the weekly site inspection report. From an operational perspective I am of the opinion that it is more prudent for the Council to undertake weekly inspections and initiate appropriate corrective works on an ongoing basis.

Under Condition 1.2 EPA have listed quantities and categories of waste to be accepted for disposal and recovery at Gortadroma. Limerick County Council wish to amend the waste categories to take account of the fact that sludges are no longer accepted on site as per licence condition 8.2.9 and such category can now be removed from the scheduled list. The site is licensed to take 130,000 tonnes of waste per annum and approval is being sought to amend the waste category for mixed Municipal Waste (Household and Commercial) so that flexibility is provided to meet the variable demand for disposal of household and commercial waste.


Condition 5.1 sets out emission limit values for leachate tankered off site to Limerick County Council waste water treatment plants. Limerick County Council are requesting that emission limits for leachate tankered off site be removed from the licence.

There is an on-site leachate treatment plant at Gortadroma which treats effluent in accordance with EPA licence conditions. The storage capacity of the plant is approximately 1000 m³ which is equivalent to eight days storage. During periods of heavy rainfall the treatment plant may not be capable of treating the quantity of leachate generated and as per EPA recommendations the excess leachate has to be tankered off site to Newcastle West and Castletroy Wastewater Treatment plants where the effluent is again subjected to full treatment. In effect, the Council feel that it is an unnecessary requirement which places significant demands on their on site leachate treatment facility with no corresponding benefits.

Having discussed the above mentioned matters with Mr. O'Carroll I am satisfied that the application for Licence review has significant merit and is based on practical, on-site difficulties in complying with certain aspects of specific licence conditions. I am also satisfied that there is a thorough, comprehensive and robust environmental control, management and monitoring regime in place on site. This is reflected in the significant reduction of public complaints relating to the operation of the facility. Examination of the complaints register shows a drop from annual level of 130-150 to approximately 30 in the last recorded twelve month period. Further, the amendments to Licence conditions as currently sought will not in my opinion, diminish or undermine in any form the existing licence requirements. It is my opinion that any revised conditions, taking note of the requested amendments may indeed be more practical and workable to implement from a Licensee perspective and at the same time maintain a satisfactorily high level of environmental control throughout the facility.

Accordingly, I have no objection to the application on public health grounds.

Yours faithfully,


James Cahill
Senior Environmental Health Officer