EPA principal office,
P.O. Box 3000,
Johnstown Castle Estate,
County Wexford.

Date 13th November 2009

RE:	**Waste Licence Register No:**	W0020-02
	Applicant:	Environment & roads. Monaghan County Council, County Offices. The Glen. Monaghan.
	Facility:	Scotch Corner Landfill, Letterbane. Annyalla, Castleblaney, County Monaghan

Dear Sir/Madam

Monaghan County Council wishes to object to the following aspects of the proposed reviewed licence :

Part II Conditions

Condition 1 Scope of the licence

Sub-section 1.5 - subset b) & d) appear to be a duplicated - Deletion or explanation is required.

Condition 3 Facility Infrastructure

Subsection 3.14.2 requires the installation of an interceptor drain around the perimeter of the site. An interceptor drain to phase 1 & 3 has already been installed. The inclusion of this condition is therefore unnecessary as its inclusion is superseded by the installation of the drain.

See subsection 5.2 comments which directly relate to this section.

Condition 4 Restoration and Aftercare

Subsection 4.1 the final level of 114m was determined based on the assumption that the landfill site was originally 97.8m OD (Malin Head). The true original level of the site was 124.8m OD (Malin Head). Therefore the finished level of the facility should be adjusted accordingly and not exceed 144.2m OD (Malin Head). (Ref. letter to Ewa Babiarczyk dated 5th January 2009 from Kieran Duffy, Monaghan County Council).

Subsection 4.3 d) Clarification on the wording is required considering EPA letter dated 20th June from Mr. Kieran O Brien programme manager.

Condition 5 Facility Operation and Waste Management

In respect to sub section 5.10.1 see objection contained within condition 10 and in particular objection related to sub section 10.2
With respect to subsection 5.22, 5.23, and 11.9 it is recommended that the EPA consider amending Condition 3 of the licence to facilitate the possible provision of a Mechanical Biological Treatment (MBT) Plant. This would provide Monaghan County Council with the scope for an on-site facility to cater for the removal of recyclables and fines from the residual bin. It would be proposed that the compostable fines would undergo in-vessel composting on site.
As the North-East region is currently introducing 3-bin collection systems, it is requested that the EPA consider amending Condition 5.8.2.2 of the current licence which states that the quantity of biodegradable waste to be composted shall not exceed 2,000 tonnes per annum. It is requested that this figure be increased to 5,000 tonnes per annum to facilitate the treatment of waste collected via the 3 bin system, MBT organics, and green waste accepted at the MRF.

Condition 6 Emissions

Subsection 6.6.1 Disposal of Leachate refers only to "Ballybay Waste Water Treatment Plant. ....." . You are referred to EPA documentation dated 12th February 2002 Ref. WL20-1/AK01CN received by Monaghan County Council which approved the use of Monaghan Waste Water Treatment Plant for the disposal of tankered leachate from Scotch Corner landfill . Condition 6.6.1. should be altered accordingly.

Condition 10 Records

Subsection 10.2 should exclude those arriving at the materials recovery Facility by private vehicles. It is unworkable and completely impracticable to request details as outlined in subset (i) – (xiii) from each individual member of the public using MRF. Interpreted literally, this would mean that a householder would , for example , have to quantify the number of wine bottles, beer cans and newspapers that he / she was bringing to the facility .Bearing in mind that a householder can deposit such waste ,without accounting for it ,at a Bring Facility it would appear unfair to ask them to provide a breakdown of their materials when they go to the MRF. This request will have the detrimental effect of discouraging usage and will lead to problems of illegal dumping and add to enforcement issues and workload when it is unnecessary. It is considered that such a measure would be counterproductive as the inconvenience involved would serve to discourage householders from using the facility.

Whilst it is true that some householders deposit black bags of refuse in the unit – the total quantity of waste per annum deposited in this manner (245 tonnes in 2008) as a percentage of the overall waste is miniscule. The potential for such a small quantity of mixed municipal waste adversely affecting overall targets is negligible. Hence Monaghan County Council would recommend the restoration of the exemption for private vehicles visiting the MRF.

Furthermore , Condition 5.10.1 is ambiguous and would appear to contradict condition 10.2 - Clarification is required .

Condition 11 Reports and Notifications

See reference to subsection 11.9 in condition 5 objection.

Condition 12 Charges and financial Provisions

With respect to subsection 12.3 we are awaiting clarification from Irish Public Bodies (insurance agents) No objections

Schedule A; waste Acceptance

Licence no. W0020-01 permitted the acceptance of a total of 39,500 tonnes . The revised Schedule A has reduced this total by 5,600 tonnes – reflecting the removal of Sewage Sludge and Non- Hazardous Industrial Sludge. The Council requests the re-instatement of the overall total of 39,500 for the following reasons:

Waste Management is a highly competitive business – the fixed costs involved are such that Local Authorities must endeavor (within the constraints of their licence) to maximise usage by achieving economies of scale in order to remain viable. Maintaining our local customer base has the added advantage of environmental sustainability through minimizing carbon footprint. All Local Authorities are operating under extreme financial pressure due to the current economic downturn. It is in no one's interest for our landfills to become unsustainable since having funds available for aftercare is dependent upon sufficient income being received during the life of the Landfill. In light of the fact that our site had been deemed suitable for the acceptance of 39,500 tonnes of waste per annum in the past and operated accordingly, we feel that there can be no reason why we cannot retain that level .Substituting, for example, increased volumes of household waste for sewage sludge is unlikely to lead to any adverse environmental effects but it *would* enable us to remain competitive.

We would therefore urge the retention of the overall annual tonnage allowance of 39,500.

Schedule D: Monitoring

D.5 Surface Water, Groundwater and Leachate
As per EPA documentation dated 21/03/2007 Ref. W0020-01/AP04AS received by Monaghan County Council approving the proposed medication to the licence monitoring requirements at Scotch Corner landfill Table annexed should replace table referenced in D5.

If you have any queries with this submission please feel free to contact the undersigned by emailing mpmurray@monaghancoco.ie or telephoning 047 30553

Yours Sincerely

Martin Murray
Senior Engineer
Environment Section

Parameter	Groundwater: Well Water (W7) Monitoring Frequency	Groundwater: Bedrock Boreholes (B1, B2, B3, B4, B5, B6 & RC1) Monitoring Frequency	Groundwater: Overburden boreholes (B1a, B2a, B3a, B4a, B5a, B6a & S3) Monitoring Frequency	Groundwater: Discharging to surface water (G1 & G2) Monitoring Frequency	Surface Water (S7, S8 & S9) Monitoring Frequency	Surface Water (S5, S6, EPA155 & EPA180) Monitoring Frequency	Leachate (L5, L7, L8 & L9) Monitoring Frequency	Leachate (L6) Monitoring Frequency
Level	N/A	Quarterly	Quarterly	N/A	N/A	N/A	Quarterly	N/A
Ammoniacal Nitrogen	Quarterly	Annually	Quarterly	Monthly	Monthly	Quarterly	Annually	Quarterly
BOD	N/A	N/A	N/A	Monthly	Monthly	Quarterly	Annually	Quarterly
COD	N/A	N/A	N/A	Monthly	Monthly	Quarterly	Annually	Quarterly
Chloride	Quarterly	Annually	Quarterly	Monthly	Monthly	Quarterly	Annually	Quarterly
Dissolved Oxygen	Quarterly	Annually	Quarterly	Monthly	Monthly	Quarterly	N/A	N/A
Electrical Conductivity	Quarterly	Annually	Quarterly	Monthly	Monthly	Quarterly	Annually	Quarterly
pH	Quarterly	Annually	Quarterly	Monthly	Monthly	Quarterly	Annually	Quarterly
Total Suspended Solids	N/A	N/A	N/A	Monthly	Monthly	Quarterly	N/A	N/A
Temperature	Quarterly	Quarterly	Quarterly	Monthly	Monthly	Quarterly	Annually	Quarterly
Boron	Annually	Annually	Annually	Annually	N/A	N/A	Annually	Annually
Cadmium	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Calcium	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Chromium (total)	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Copper	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Cyanide (total)	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Fluoride	Annually	Annually	Annually	Annually	S7 & S8 only Annually	N/A	Annually	Annually
Iron	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Lead	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
List I/II Organic Substances	Annually	Annually	Annually	Annually	S7 & S8 only Annually	N/A	N/A	Annually
Mineral Oils	N/A	N/A	N/A	N/A	S9 only monthly	N/A	N/A	N/A
Magnesium	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Manganese	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Mercury	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Potassium	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Sulphate	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Sodium	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Total Alkalinity	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Orthophosphate	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Total Oxidised Nitrogen	Quarterly	Annually	Quarterly	Quarterly	Annually	Annually	Annually	Annually
Total Organic Carbon	Quarterly	Annually	Quarterly	Quarterly	N/A	N/A	N/A	N/A
Residue on Evaporation	Annually	Annually	Annually	Annually	N/A	N/A	N/A	N/A
Zinc	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Phenols	Annually	Annually	Annually	Annually	N/A	N/A	N/A	N/A