

29 JAN 2009

OFFICE OF ENVIRONMENTAL
ENFORCEMENT
RICHVIEW

Mr Kieran O'Brien
Programme Manager
EPA Regional Office
Inniscarra
Co Cork

22 January 2009

Re: Technical Amendment to W0047- 02

Our Ref: W0047/02 TechAmend0901

The Environmental Protection Agency
26 JAN 2009
CORK

A1 Waste
Environmental Management
Licensing

Received
06 FEB 2009

Initials

Dear Kieran

I am writing to you in accordance with Section 38 of the Protection of the Environment Act 2003 (inserting S.42B into the Waste Management Act 1996) to seek a Technical Amendment to W0047/02 relative to the location and type of landfill gas monitoring boreholes, and the boundary of the licensed facility.

Landfill Gas Monitoring Boreholes

As you will be aware, there has been considerable discussion between Neiphin Trading Ltd and the EPA regarding the installation of additional gas monitoring boreholes at the above facility, further to Condition 6.16.1. You will also be aware that the licensee's concerns are two-fold, firstly that shallow boreholes, (rather than the design prescribed in the waste licence) are the most effective for monitoring potential subsurface movements of gases when a potential target is nearby, as is the case at part of the facility. The second concern is that adherence to the design prescribed in the waste licence would possibly lead to a breach of the natural protection of the local groundwater.

Additionally, there have been further developments at the facility in that part of it is dedicated to the recovery of wastes and will not be utilised as a landfill for some time, thus negating the current requirement for landfill gas monitoring boreholes around this section of the facility.

We therefore propose a new, risk-based system for the design and installation of gas monitoring boreholes which identifies a number of different designs and separation distances for these boreholes. The areas where the different boreholes systems are proposed are colour-coded and shown on the attached drawing, (NTL/09/01). The boreholes systems are as follows:

1. Green coded: combination of shallow boreholes at 45m intervals and deep boreholes to 6m depth at 90m intervals. Risk assessment; to allow for deep and shallow monitoring of gases based on existence of property near by;

Service/Skip Hire: 01 466 4444
 Accounts: 01 466 4400
 Customer Care: 01 466 4456
 Fax: 01 466 4411
 E-Mail: info@a1waste.ie
 Website: www.a1waste.ie

EPA
OEE DUBLIN

Main File _____ ✓
 Public File _____ ✓
 Evaluation File _____ DH
 Database _____ MOB
 Date _____ 29/1/09

3 Broomhill Business Complex, Broomhill Road, Dublin 24.

2. Yellow coded: existing boreholes, cease monitoring once adjacent waste is removed. Risk assessment; no need to monitor for gases once waste is removed;
3. Purple coded: maintain monitoring of existing boreholes, install additional deep boreholes to specification in W0047-02 at 250m intervals. Risk assessment; no near-by properties, install deep boreholes once this area of facility is developed as a lined landfill to monitor for deep migration of gases;
4. Orange coded: shallow boreholes at 90m intervals plus deep boreholes at 90m intervals, as per specification in W0047/02. Risk assessment; lined landfill with partially stabilised waste, nearby properties.

The Technical Amendment sought to Waste Licence W0047 - 02, Condition 6.16.1, is as follow:
" The licensee shall install and maintain perimeter landfill gas monitoring boreholes in accordance with the scheme proposed in correspondence from the licensee dated January 22nd 2009, (their reference: W0047/02TechAmend0901)".

We submit that this Amendment will facilitate the operation of the Licence and does not result in the requirements of S.40(4) of the 1996 Act as amended ceasing to be satisfied. Indeed, we are concerned that implementation of the condition as it is currently phrased may cause environmental pollution, due to the breach of the natural boulder barrier currently protecting the underlying groundwater and the inappropriateness of the design to detect the shallow migration of gases.

Boundary of Site

A further recent development has occurred in that the company has purchased some additional land, shown on the attached drawing, (NTL/09/02) as delineated and marked in blue, and we wish to extend the boundary of the facility to include this land. The proposed addition to the facility boundary is marked in red. There is currently an unoccupied semi-derelict house on the property which we intend to demolish in the future. You will see that some of the proposed new gas monitoring boreholes are located along this new boundary.

The Technical Amendment sought is to amend Condition 1.5 to make reference to the attached revised Drawing No., (NTL/09/02). We submit that this Amendment will facilitate the operation of the Licence and does not result in the requirements of S.40(4) of the 1996 Act as amended ceasing to be satisfied.

I look forward to your response. Thank you for your assistance in this matter.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Ted', is written over a horizontal line. The signature is stylized and cursive.

Dr Ted Nealon, B.Sc., M.Sc., Ph.D., MCIWM
Managing Director



LEGEND

- GROUND SURFACE CONTOURS CURRENT TO 1/2/07
- 2M CONTOUR INTERVAL SHOWN INSIDE FACILITY
- WASTE LICENSE WW047-03 FACILITY BOUNDARY
- AS BUILT PHASE 1 LANDFILL
- DWELLINGS



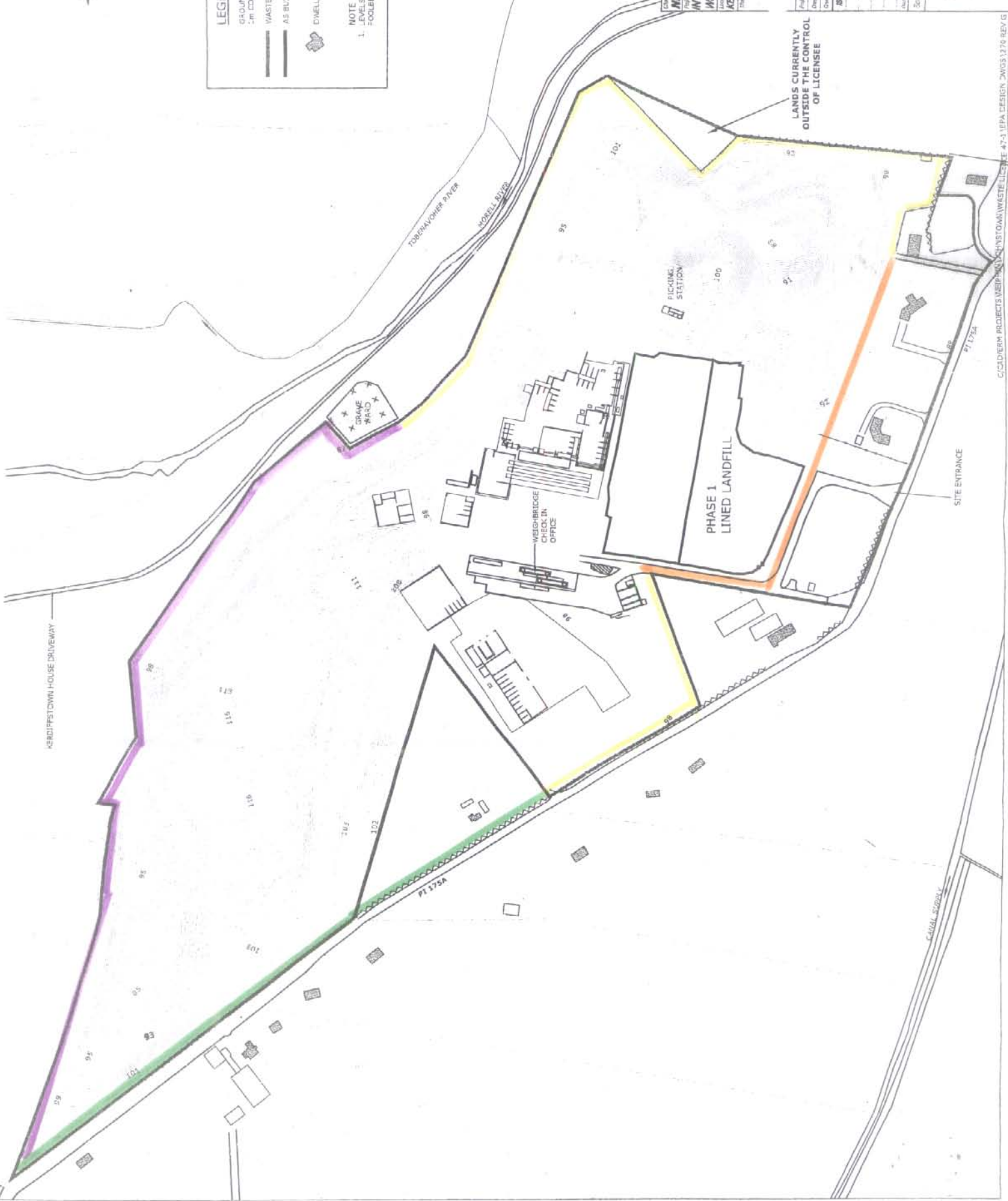
- NOTE**
1. LEVELS ARE RELATIVE TO FOOTING DATUM

WELPHIN TRADING LTD
INTEGRATED WASTE MANAGEMENT FACILITY
 Waste Licence WW047-02 / WW047-01
 KERRIFSTOWN, WMS, Co. KILDARE

SAN 09

Plant No.	04.153	Region	NTL 09/10
Design No.	CC	Authority	
Client No.	CC	Issue To	EPA
Issue To	EPA	Issue Of	G
Author		Date	
Scale			

NTL 09/10



LANDS CURRENTLY OUTSIDE THE CONTROL OF LICENSE

C/O DERMOT PROBERTS WELPHIN TRADING LTD WASTE LICENSE #7-4 LEPA DESIGN DWG 03 1/2/07 REV G



LEGEND

GROUND SURFACE CONTOURS CURRENT TO 1/201/09
 1M CONTOUR INTERVAL SHOWING FACILITY
 WASTE LICENCE WW0047-02 FACILITY BOUNDARY
 AS BUILT PHASE 1 LANDFILL



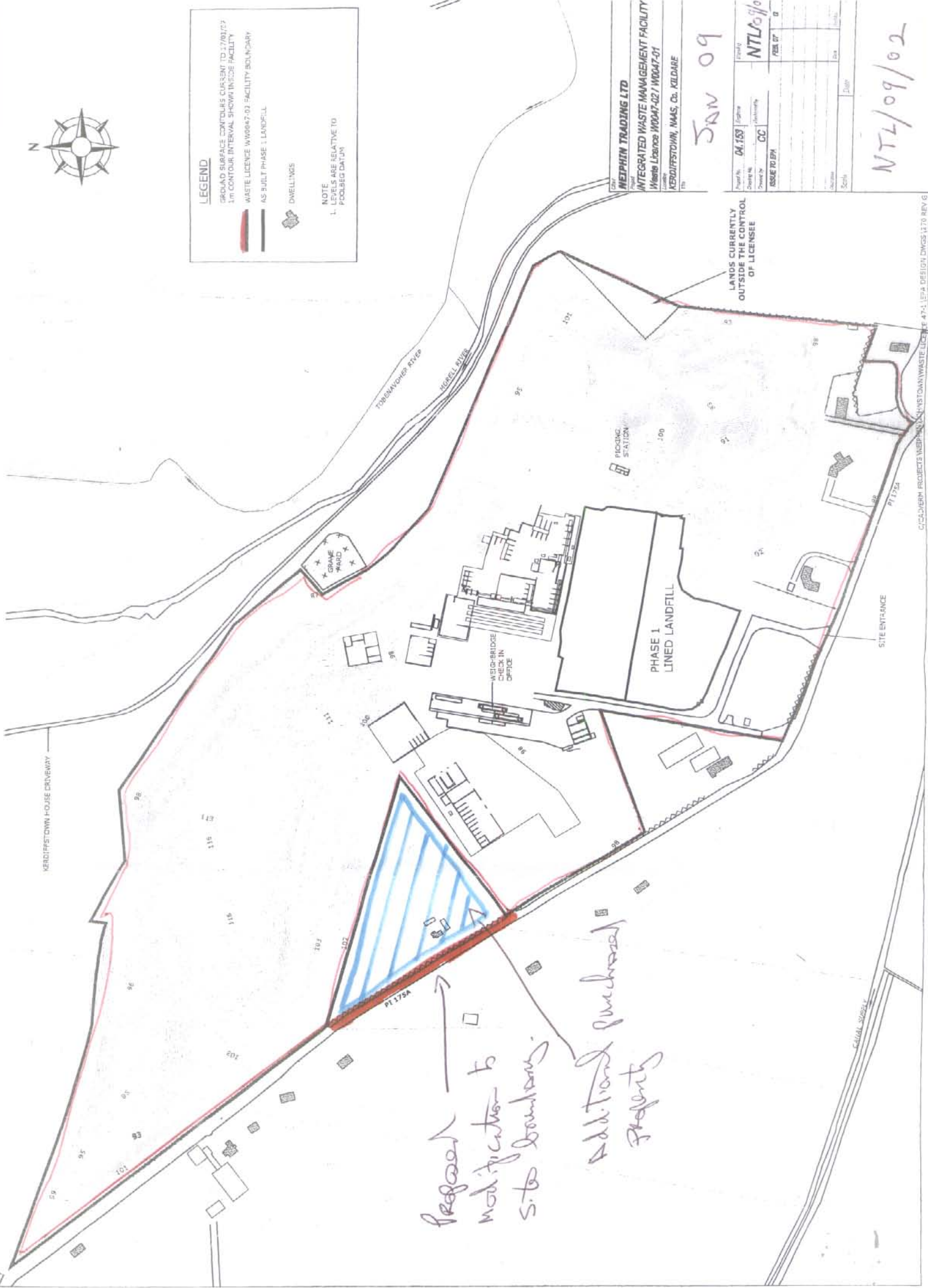
NOTE
 1. LEVELS ARE RELATIVE TO
 FOOTREG DATUM

WEPHIN TRADING LTD
INTEGRATED WASTE MANAGEMENT FACILITY
 Waste Licence WW0047-02 / WW0047-01
 KERRIFFSTOWN, WMS, Co. KILDARE

JAN 09

Project No.	04.153	Project	NTL/09/02
Drawing No.	CC	Issue No.	0
Drawn By	CC	Issue Date	
Checked By		Issue To	
Author		Scale	
Issue To		Date	

NTL/09/02



LANDS CURRENTLY
 OUTSIDE THE CONTROL
 OF LICENSEE

Proposed modification to site boundary
Additional purchased Property