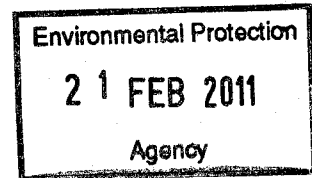


Sub on obj 2

Dorota Richards

From: Licensing Staff
Sent: 21 February 2011 16:11
To: Dorota Richards
Cc: Marie Fay
Subject: FW: Reg No. W0077-04 FAO: Dorota Richards
Attachments: Submission by Cavan County Council to Objections made in relation to PD W0077-04.pdf

From: Siobhan Glynn [mailto:siobhan.glynn@rpsgroup.com]
Sent: 21 February 2011 16:02
To: Licensing Staff
Cc: John Brannigan; Willie Madden
Subject: Reg No. W0077-04 FAO: Dorota Richards



Dear Ms. Richards,

Please find attached Submission by Cavan County Council to Objections made in relation to Proposed Decision of the Agency on Waste Licence Review Application for Corranure Landfill Register No W0077-04.

I would be grateful if you could respond to this email confirming receipt of this submission.

Thanking You,

Siobhan Glynn

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RPS Group Limited - Registration Number: 91911
RPS Consulting Engineers Limited - Registration Number: 161581
RPS Engineering Services Limited - Registration Number: 99795
RPS Planning & Environment Limited - Registration Number: 160197
RPS Mary Murphy Associates Limited - Registration Number: 260533

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Licensing Unit,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

21st February 2011

Our Ref: MGE0068LT0096GAL
File Ref: 330

Re: Submission by Cavan County Council to Objections made in relation to Proposed Decision of the Agency on Waste Licence Review Application for Corranure Landfill, Licence Register No. W0077-04

Dear Sir/Madam,

We refer to the EPA's invitation to Cavan County Council dated 24th January 2011 to make a submission to the following objections received by the EPA in relation to the Proposed Decision on Waste Licence Review Application for Corranure Landfill (Reg. No. W0077-04):

- Mr Edmund McCabe, and
- Cavan Better Waste Management Group c/o Peter Sexton.

The following points are made in response to both objections received by the EPA:

1) We refer to the detailed objection on Proposed Decision Reg. No. W0077-04 prepared by RPS on behalf of Cavan County Council which was submitted to the EPA on the 20th January 2011. The objection document sets out in detail the grounds for objection to the EPA's decision. Cavan County Council request that detailed consideration be given to the objection.

2) The following landfill operations and procedures are implemented at Corranure Landfill in relation to odour management:

- The working face is kept as small as possible,

- All waste deposited at the working face is compacted on a daily basis,
- The working face is covered with suitable material at the end of each day,
- Waste vehicles are covered appropriately,
- An active landfill gas extraction and flaring system exists at the landfill which includes for vertical and horizontal gas extraction wells, collection pipework, condensate pots and two 1,500m³/hr flare units,
- Surface emission methane surveys are undertaken on a regular basis by the licensee/operator to identify potential odour sources and to allow immediate remedial works to be carried out,
- An extensive landfill gas monitoring programme is carried out in accordance with the existing waste licence,
- The facility telemetry system includes monitoring of landfill gas infrastructure,
- Filled landfill cells are fully sealed with a permanent capping system in accordance with the waste licence,
- Remedial and improvement works are carried out on a continuous basis on the capping system and on the landfill gas infrastructure to minimise the risk of odour emissions, and
- A Landfill Gas Management Plan is operated at the landfill.

In addition, a dedicated Landfill Gas Manager is employed at Corranure Landfill who is responsible for landfill gas management at the facility.

As outlined in the objection made by Cavan County Council to the EPA on 20th January 2011, Cavan County Council is willing to explore technical solutions with the EPA which are currently available to further assist in odour management such as gas sensors connected to telemetry systems to determine sources of emissions and sources of odour at landfills.

Cell 3 has ceased accepting waste since early 2010 and is temporarily capped with proposals to provide a permanent capping system in 2011. This proposal will further reduce the risk of odour emissions at the facility.

3) Litter management is carried out on a daily basis at Corranure Landfill which includes the following elements:

- A landfill operative carries out the active management of litter on site,
- The working face is enclosed by a six metre high litter fencing,

- Litter trapped in the fencing is removed as soon as practicable,
- Litter on or in the vicinity of the landfill is removed, subject to the agreement of the landowners, immediately and in any event by 10.00am of the next working day after such waste is discovered or reported,
- All waste deposited at the working face is compacted on a daily basis, and
- The working face is covered with suitable material at the end of each day.

4) Significant improvement measures have been implemented to the R188 regional road at the landfill in the past number of years in accordance with An Bord Pleanála planning conditions which allows traffic to access the site safely. Improvements included the construction of a dedicated right turning lane, providing a dedicated deceleration lane for accessing the facility, widening the existing R188 road and upgrading the site entrance.

5) Cavan County Council has provided stockproof fencing between the landfill and the boundary with Mr. McCabe's land and maintenance of this fencing is carried out when required. In addition, Cavan County Council has also carried out improvement works at the entrance to McCabe's land adjacent to the landfill. Cavan County Council has been prepared at all times to resolve any reasonable issues raised by Mr. McCabe regarding the landfill facility.

6) A bird control programme is currently implemented with the objective of making food sources inaccessible and living conditions as unattractive as possible for the birds. The following landfill procedures are implemented as control measures against birds:

- The working face is kept as small as possible,
- The waste is compacted with a compactor,
- The working face is covered at the end of every day with an inert cover material, and

Bird control contractors have been operating a multifaceted bird control programme at Corranure Landfill as part of licence compliance for a number of years. In addition a member of landfill staff is responsible for applying bird control techniques on a daily basis which includes the use of bangers, squawkers and helium balloons.

7) There has been no evidence to date of leachate contamination associated with Corranure Landfill at or beyond the facility boundary. The current monitoring programme shows no evidence of the landfill having a significant negative impact on either the ambient water quality in the Corranure and Lismagratty streams or on groundwater quality.

8) Cavan County Council continues to be prepared to resolve any reasonable issues raised by Mr. McCabe regarding drainage on his lands.

9) As outlined in the Cavan County Council's objection to the EPA dated 20th January 2011, Mr. Gerry Woods was appointed as Landfill Manager at Corranure in February 2010. Mr. Woods is suitably qualified, having a Degree in Mechanical Engineering, a Masters qualification in Environmental Engineering from Queens University and is a Chartered member of Engineers Ireland. He also has significant landfill management experience, having managed Tullyvar Landfill in Dungannon on behalf of Dungannon Council since August 2005. Cavan County Council and Oxigen Environmental Ltd. consider that Mr. Woods is competent, qualified and experienced to operate and manage Corranure Landfill to the required standard. It should be noted that the frequency of odour related complaints reduced significantly in 2010 during the period in which Mr. Woods worked as Landfill Manager. Mr. Woods remains in his position as Landfill Manager at Corranure Landfill.

10) As outlined in the Cavan County Council's objection to the EPA dated 20th January 2011, Oxigen Environmental as operator of the facility proposed to the EPA that a Site Agent be provided during the operation of Cell 4 to oversee and report to the EPA on the management and operation of the facility. Oxigen Environmental Ltd. also committed to funding this position. The EPA subsequently advertised this position and appointed three independent companies on a framework. The initial 18 month appointment under this framework is understood to have been made to White Young Green. This appointment of a Site Agent will provide the EPA with additional supervision and continuous presence at Corranure Landfill and will provide increased assurance on the standard of operation and compliance at the facility.

11) Significant investment has been made at Corranure Landfill over the last number of years which has resulted in substantial infrastructural improvements and increased environmental compliance. Both Cavan County Council as licensee and Oxigen Environmental Ltd. as operator will continue to work closely with the EPA and

will implement improvement measures as and where necessary in order to operate Corranure Landfill in full compliance with the conditions of the waste licence.

12) As outlined in the Cavan County Council's objection to the EPA dated 20th January 2011, the Proposed Decision W0077-04 to reduce the annual waste intake at Corranure Landfill to 45,000 tonnes per annum is considered to be unfair to the licensee and has been made on an arbitrary basis. The EPA had already proposed a restriction on waste filling in Cell 4 which was accepted by the landfill operator and hence there was no need to modify the licence condition reducing the annual waste intake to 45,000 tonnes per annum.

13) The Proposed Decision W0077-04 to reduce the waste intake to 45,000 tonnes per annum, to limit the waste filling depths in Cell 4 to 15m and to limit the quantity of waste to be filled in Cell 4 is inconsistent with previous licensing decisions taken by the EPA for Corranure Landfill. The cost of constructing Cell 4 is a significant cost and has already been expended by the parties. The viability of operating Cell 4 is now seriously questioned.

14) In accordance with Conditions 12.3.3 and 12.4 of the Proposed Decision and Section 54A of the Waste Management Act 1996-2010 Cavan County Council as licensee are required to make financial provision to cover any liabilities associated with the operation including closure, restoration and aftercare of the facility to the satisfaction of the Agency.

Cavan County Council as licensee for Corranure Landfill is also currently participating in an EPA pilot programme in relation to Environmental Liability Risk Assessment (ELRA) and Closure Restoration and Aftercare Management Plan (CRAMP') and implementation of Financial Provision (FP).

15) Condition 8.4.1 of the Proposed Decision W0077-04 stipulates the amount of biodegradable municipal waste (BMW) to be accepted for disposal at Corranure Landfill as a percentage of the overall municipal solid waste (MSW). Until June 2013, a maximum of 47% by weight of MSW accepted for disposal shall comprise BMW, while from July 2016 onwards a maximum of 15% by weight of MSW shall comprise BMW.

The application by Cavan County Council in September 2008 for a review of the

waste licence for Corranure Landfill (W0077-04) was made in parallel with a separate application by Oxigen Environmental Ltd. for a new waste licence (W0248-01) at Corranure to include Cells 3 and 4 and future waste infrastructure developments including materials recovery and biological treatment. The application by Oxigen Environmental Ltd. to develop an integrated waste management facility at Corranure would provide the necessary recycling, processing and biological treatment capacity required to meet regional and national targets for waste pre-treatment prior to landfilling and for diversion of biodegradable waste from landfill to meet the requirements of Condition 8.4.1 of the Proposed Decision W0077-04.

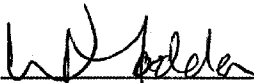
The achievement of the diversion rates as outlined by 2016, will reduce the potential for odour creation. It is at the discretion of the EPA to seek earlier diversion and earlier higher target diversion rates.

16) Cavan County Council as licensee and Oxigen Environmental Ltd. as the facility operator remain fully committed to operating Corranure Landfill to the highest environmental standard.

Cavan County Council request that the EPA give detailed consideration to the points raised in this submission. It is further requested that the EPA give detailed consideration to the objection document submitted on their behalf by RPS on 20th January 2011.

RPS are forwarding this submission on behalf of Cavan County Council.

Yours sincerely,



Willie Madden,
Operations Director,
RPS