

CONSULTANTS IN ENGINEERING & ENVIRONMENTAL SCIENCES

#### IRELAND UNITED KINGDOM POLAND SAUDI ARABIA

Our Ref: Q: LW14/120/02/Let004/TR/MG

Ms. Ewa Babiarczyk The Environmental Protection Agency Environmental Licensing Programme Office of Climate, Licensing, Resources & Research PO Box 3000 Johnstown Castle Estate County Wexford

03 March 2015

## Re: Response to Notification Re Regulation 11 (EPA Industrial Emissions (Licensing) Regulations 2013 (W0025-04)

Dear Ms. Babiarczyk,

Fehily Timoney and Company (FTC) is retained by Carlow County Council (CCC) to prepare the IED Licence Review Application for Powerstown Land (100025-04) and to respond to any further requests for information.

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This is in response to a letter dated 28 January 2015 from the Environmental Protection Agency (EPA) to Mr. Pat Connolly, Landfill Manager, Rowerstown Landfill.

The EPA, in accordance with Regulation 10 of the Industrial Emissions (Licensing) Regulations, requests the information as follows in support of the application under Regulation 9 of the Regulations.

Documents referenced in this letter:

- EIS for the Continued Operation and Intensification of Powerstown Landfill, Volume 2 of 3 Main Volume, 2012
- EIS for the Continued Operation and Intensification of Powerstown Landfill, Volume 1 of 3 Non-Technical Summary, 2012
- Industrial Emissions Activities Licence Review Application for Powerstown Landfill, submitted to the EPA on 28 November 2014. This is referred to here as the licence review application form.
- Attachments in Support of an Industrial Emissions Activities Licence Review Application for Powerstown Landfill, submitted to the EPA on 28 November 2014. This is referred to here as Attachments.

Each of the 4 documents listed above were submitted to the EPA on 28 November 2014 for the licence review of W0025-03 (W0025-04). .

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The questions and responses are as follows:

#### EPA

 As required under Regulation 9(2)(g), state whether a composting activity takes place at the installation. Class 2 of Table 3.1 suggests that the composting is a disposal activity and Table 3.2 suggests it is a recovery activity. Please clarify whether the activity should be regarded as a disposal or a recovery activity. Also, states the production capacity for composting in tonnes/day. State the total tonnage of compost used over the last three years for restoration works as referred to under Class 11 of Table 3.2.

#### Response

1. Waste composting does not take place, nor has it ever taken place at Powerstown Landfill.

Each of the previous licences, (W0025-01, -02 and 03) included licence approval for green waste composting. In accordance with licence condition 3.18.1 in W0025-03, CCC will need to comply with the following. Appropriate infrastructure for the composting of waste shall be established and maintained at the facility prior to any waste being composted. This infrastructure shall at a minimum comprise of that detailed in Article 14 response (No. 4) dated 23-03-04 and such that drainage from the composting area is directed to the leachate lagoon as detailed therein'. Schedule B requires an SEW for the installation of the compost facility

CCC wishes to retain the permission in the licence and planning for composting but has no immediate plans to develop the activity. In the event that CCC proposed to commence green waste composting, Condition 3.18.1 would be complied with, an SEW prepared and an updated site drawing submitted to the EPA.

Composting is a recovery activity and should only have been included in Table 3.2 of the EIS, as Class 2. In the event that composting was to commence on site, it is proposed to use the composted green waste as a restoration material (Class 11 of Table 3.2). However, it has not been produced on site, and has not been used as a restoration material. A corrected version of Table 3.1 is included as Appendix 1 to this letter.

#### EPA

2. As required under Regulation 9(2)(g), state the source of waste water that is biologically treated at the installation as stated in Class 6 of Table 3.1 of the EIS.

#### Response

2. The source of the wastewater is from the Administration building at the facility. It is a Bio-Crete unit for the treatment of domestic wastewater.

#### EPA

3. As required under Regulation 9(2)(g), state the type of waste, including EWC codes, stored on-site pending disposal as referred to under Class 13 in Table 3.2 of the EIS.

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#### Response

 Class 13 provides for the storage of residual MSW (EWC code 20 03 01) at the Recycling Centre. Residual MSW is accepted at the Recycling Centre from members of the public for disposal in the landfill. When full the container is tipped into the landfill body.

This waste stream and tonnage is included in the total waste materials for disposal in Table 4.5 of the Attachments (to the licence application).

Class 13 provides for the storage of waste in the quarantine area pending inspection and subsequent removal off site or disposal on site. The type of waste and EWC code, will be as per Table 4.5 of the Attachments as any of the licensed waste types could be potentially quarantined.

#### EPA

4. As required under Regulation 9(2)(g), state the types of waste, including EWC codes, stored on site pending recovery as referred to in Class 13 of Table 3.2 of the EIS.

#### Response

4. Class 13 of Table 3.2 provides for the storage of recyclable materials accepted at the Recycling Centre pending transfer off-site for recovery. There is a list of waste types, EWC codes and a total tonnage for materials accepted at the Recycling Centre in Table 4.5 of the Attachments. A summary of total tonnages of material accepted at the Recycling Centre was included in Section 3.2.8 of the EIS.

The EPA has requested an updated non-technical summary of the EIS. None of the above responses require an update to the non-technical summary.

I trust the enclosed meets with your satisfaction and should you have any queries please contact the undersigned.

Yours sincerely,

Tanya Ruddy

for and on behalf of Fehily Timoney & Company

#### **Mobile Items of Plant**

The existing facility has several items of plant which are required to operate the facility effectively. These items of plant include for example:

- 1 no 360° tracked excavator
- 1 no front loader
- 1 no tractor and trailer
- 1 no forklift

From time to time additional items of plant are brought to site to operate and maintain the facility. These items of plant include, for example, road sweepers, grass mowing equipment, mini diggers, water tanker/bowsers. A leachate tanker (road going truck) also visits site on a daily basis to remove leachate from the site (refer to leachate section 3.3.14).

When landfill capping works are being carried out as required by the waste licence, construction plant is also required as described later in this section.

#### Fixed Items of Plant

Fixed items of plant on site include:

- Weighbridge
- Landfill gas flare and associated equipment

#### 3.2.6 Waste Acceptance

The landfill is licensed to carry out the following waste disposal activities in accordance with the Third Schedule of the Waste Management Acts 1996 to 2010

# Table 3.1: Waste Disposal Activities, in accordance with the Third Schedule of the Waste Management Acts 1996 to 2010

|          | Y D  |
|----------|--|
| Class 2  | Recycling or reclamation of organic substances which are not used as<br>solvents (including composting and other biological transformation<br>processes):<br>This activity is limited to the composting of green waste from households and the<br>collection of wastes at the recycling facility.  |
| Class 4  | Surface impoundment, including placement of liquid or sludge discards into pits, ponds or lagoons:<br>This activity is limited to the storage of leachate/ collected surface water in lagoon(s)/ retention ponds.  |
| Class 5  | <b>Specially engineered landfill, including placement into lined discrete cells which are capped and isolated from one another and the environment</b> : <i>This activity is limited to the disposal of non-hazardous waste into lined cells.</i>  |
| Class 6  | <b>Biological treatment not referred to elsewhere in this Schedule which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 10 of this Schedule:</b><br><i>This activity is limited to the biological treatment of wastewater generated on site.</i>   |
| Class 7  | Physico-chemical treatments not referred to elsewhere in this Schedule<br>(including evaporation, drying and calcination) which results in final<br>compounds or mixtures which are disposed of by means of any activity<br>referred to in paragraphs 1 to 10 of this Schedule:<br>The activity is limited to the removal of grit from leachate in the leachate lagoon(s). |
| Class 13 | <b>Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced:</b><br><i>This activity is limited to the storage of waste in receptacles and designated areas prior to disposal on or off site.</i>                        |

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3.2.6 <u>Waste Acceptance</u> The landfill is licensed to carry out the following waster disposal activities in accordance with the Third Schedule of the Waste Management Acts 1996 to 2010

#### Waste Disposal Activities, in accordance with the Third Schedule of the **Table 3.1:** Waste Management Acts 1996 to 2010 40°

| Class 1  | <b>Deposit on, in or under land (including landfill)</b><br>This activity is limited to the disposal of non-hazardous waste at the facility  |
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| Class 4  | Surface impoundment, including placement of liquid or sludge discards into pits, ponds or lagoons:<br>This activity is limited to the storage of leachate/ collected surface water in lagoon(s)/ retention ponds.  |
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