

Section A.1 Non-Technical Summary Attachment

A.1.1 Background and Nature of the Activity

Donegal County Council holds Waste Licence ref. W0062-1 for Churchtown Landfill Site. The site closed on 31st August 2000. The landfill facility at Churchtown occupies an area of approximately 9.7 hectares in the townland of Churchtown, near Lifford, Co. Donegal.

The site is located approximately 3km south west of Lifford and bordered to the northwest by the N15, the main Lifford to Ballybofey Road. The ground to the northeast and southwest of the site is the low lying and gently undulating flood plain of the River Finn, both areas being used for grazing. The southeastern boundary is formed by the River Finn. Site Location and Layout are shown on Drawings IBR01015/100 and IBR1015/103. The National Grid Reference for the facility is 230985E 395986N.

A willow bed and an Integrated Constructed Wetland (ICW) has recently been installed on top of the landfill. This waste licence review is required to accommodate surface water discharge monitoring.

The site is located within Donegal County Council planning authority and the activity constitutes development but is exempted development.

An Environmental Impact Assessment (EIS) has not been prepared in support of this application. An Appropriate Assessment Screening has been prepared and this document is contained as appendices to this application. The site is closed and therefore no wastes will be treated, recovered or disposed of at the facility.

A.1.2 Class of Activity

The classes of activity concerned are specified in the Third Schedule of the Waste Management Act, 1996, as amended:-

Third schedule of waste management acts 1996 to 2011 disposal operations

D 1 Deposit into or on to land (e.g. landfill, etc.)

D 4 Surface impoundment (e.g. placement of liquid or sludgy discards into pits, ponds or lagoons, etc.)

D 15 Storage pending any of the operations numbered D 1 to D 14 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).

A.1.3 Plant, methods, processes, ancillary processes, abatement, recovery and treatment systems and operating procedures for the activity,

The site is an unlined site historically operated on a dilute and disperses principal, whereby solid waste was tipped directly onto the underlying excavated surface with leachate allowed to percolate directly through the soils with no engineered liner installed. Landfilling began in 1987 and the site ceased operations on the 31st August 2000.

A willow bed and an ICW have recently been installed on top of the landfill. Extracted leachate is pumped to the willow plantation before discharge to surface water. If treated leachate levels are unacceptably elevated, the leachate is pumped into the nearest pumping station chamber to be

treated further by circulating via the willow/ICW's before discharging to surface water. The Willow plantation is supplied with leachate on a timed basis. A number of factors dictate leachate treatment and application rates within the Willow Plantation and are as follows:

1. Precipitation
2. Temperature
3. Visual inspection manual intervention.

Flow of leachate to ICW's is controlled on the pumping main with an actuated valve within a precast concrete chamber along with flow measurements via flow meter. Flow of leachate to ICW's is via a weir chamber and flow split on a 60 / 40 percentage basis relative to their areas (approx 60% to A series pond and remaining 40% to B series ponds).

Where leachate is available over and above the treatment capacity of the willow plantation (either through seasonal increases in leachate generation, wet/frosty weather conditions or manual operator intervention) leachate can be diverted to the ICWs as a secondary alternative. The system also allow the site operator to intervene and permit periodic irrigation of the ICWs when sufficient leachate is available during dry weather which would ordinarily be applied to the willow plantation in order to maintain the ICWs.

A.1.4 Provide information for the purpose of enabling the Agency to make a determination in relation to the matters specified in paragraphs (a) to (g) of section 40(4) of the Act

- (a) any emissions from the recovery or disposal activity in question ("the activity concerned") will not result in the contravention of any relevant standard, including any standard for an environmental medium, or any relevant emission limit value, prescribed under any other enactment,

Donegal County Council will operate the facility to comply with emission standards and limits set out in the Waste licence were applicable.

- (b) the activity concerned, carried on in accordance with such conditions as may be attached to the licence, will not cause environmental pollution,

The site is unlined but has been restored with a cap and leachate treatment system (willow and ICW) installed. The facility will be operated to ensure that the operations post restoration will not cause any environmental harm.

- (c) the best available technology not entailing excessive costs will be used to prevent or eliminate or, where that is not practicable, to limit, abate or reduce an emission from the activity concerned,

The site is unlined but has been restored with a cap and leachate treatment system. Donegal County Council will employ BAT to limit, abate or reduce an emission from the activity concerned,

- (d) if the applicant is not a local authority, the corporation of a borough that is not a county borough, or the council of an urban district, subject to subsection (8), he or she is a fit and proper person to hold a waste licence,

Donegal County Council is a local authority.

- (e) the applicant has complied with any requirements under section 53

As a Local Authority, Donegal County Council is fully committed to the on-going investment as required by this facility to ensure that it is properly managed environmentally.

A.1.5 Source, location, nature, composition, quantity, level and rate of emissions arising from the activity and, where relevant, the period or periods during which such emissions are made or are to be made,

The primary treatment option for the extracted leachate is to the willow plantation. Leachate is pumped to the willow plantation before discharge to surface water. If treated leachate levels are unacceptably elevated, the leachate is treated further by circulating via the willow plantation and/or constructed wetlands before discharging to surface water.

There are two discharge outlets from the Willow plantation (SW8 and SW10) and SW9 and SW11 are the two discharge outlets from the ICW. The proposed emission limit values (ELVs) are provided in Table A

Table A Proposed Emission Limit Values

| Parameter | Limit |
|----------------------|---------|
| pH | 6-9 |
| BOD | 20 mg/l |
| Suspended Solids | 30 mg/l |
| Orthophosphate | 2 mg/l |
| Total Ammonia (as N) | 3 mg/l |

The discharge rates from the willow and ICW systems will be variable depending on the volumes to be treated and on climatic conditions. With higher rates of discharge during the winter months and reduced or no discharges during the summer months.

A.1.6 Assessment of the effects, of any existing or proposed emissions on the environment, including any environmental medium other than that into which the emissions are, or are to be, made, and of proposed measures to prevent or eliminate or, where that is not practicable, to limit or abate such emissions,

A screening for appropriate assessment report for the proposed discharge from the leachate management system to the River Finn has been completed. The report concluded that the proposed discharge:

- (i) is not directly connected with or necessary to the management of a Natura 2000 site

and

(ii) will not have significant effects on the qualifying habitats and species of the River Finn SAC provided proposed discharge ELVs are adhered to.

Assimilative capacity was calculated to measure the receiving water body's ability to assimilate the Pollutants based on the proposed emission limit values. The assessment when taking the Q95 low flow statistics into consideration is conservative in nature given that during low flow conditions it is unlikely that there will be a discharge from the leachate management system. Therefore an estimated maximum discharge flow of 136m³/sec has been calculated (using the rainfall and evapotranspiration data available for Malin Head) and has been assessed using the Q30 mean flows in the Finn as a more appropriate flow statistic. When this flow is considered, the mass balance assessment indicates that there would be an imperceptible increase in concentrations that would not be detectable, i.e. less than the limit of detection for many laboratories.

A.1.7 Monitoring and sampling points and indicate proposed arrangements for the monitoring of emissions and the environmental consequences of any such emissions

Groundwater, surface water, leachate and landfill gas is currently being undertaken for parameters as listed in Waste Licence W0062-01, however the monitoring frequency is now quarterly from monthly. Four additional monitoring points (SW8 to SW11) have been included to monitor discharges from the willow and ICW systems.

The two outlets from the Willow plantation are being monitored by Ammonia analysers and flowmeters and recorded on the SCADA system. When any sample reaches a limit of 3 mg/l ammonia, a motorised valve will shut and divert flow via gravity into the nearest pumping station chamber (No1 or 2) for recirculation in the willow/ICW's. This scenario shall continue until sample has reached acceptable limits.

A.1.8 Describe the existing or proposed measures, including emergency procedures, to prevent unauthorised or unexpected emissions and minimise the impact on the environment of any such emissions.

An Environmental Management System (EMS) was submitted to the EPA during 2004 and approved.

All, reports/records in relation to the facility are maintained. Donegal County Council will maintain EMS for the aftercare of the site.

A.1.9 Proposed measures for the closure, restoration, remediation or aftercare of the facility.

The site is closed and has been restored. Donegal County Council are in a position to meet current foreseeable aftercare costs.

A.1.10 Financial Provision

As a Local Authority, Donegal County Council is fully committed to the on-going investment as required by this facility to ensure that it is properly managed environmentally.

A.1.11 Annex to Council Directive 80/68/EEC of 17 December 1979, describe the existing or proposed arrangements necessary to give effect to Articles 3, 4, 5, 6, 7, 8, 9 and 10 of the aforementioned Council Directive.

The site is closed. The site is unlined and has been capped. A hydrogeological risk assessment was undertaken in 2015 and submitted to the EPA. The report found that groundwater quality data does not indicate any upwards trends over time. Both groundwater and surface water contaminant fluxes from the landfill have the potential to impact on the quality of the River Finn. However, available data suggests that groundwater contaminant fluxes to the river are having a negligible effect on the river downstream of the landfill. Groundwater quality is expected to improve after the ICW and willow treatment has been commissioned.

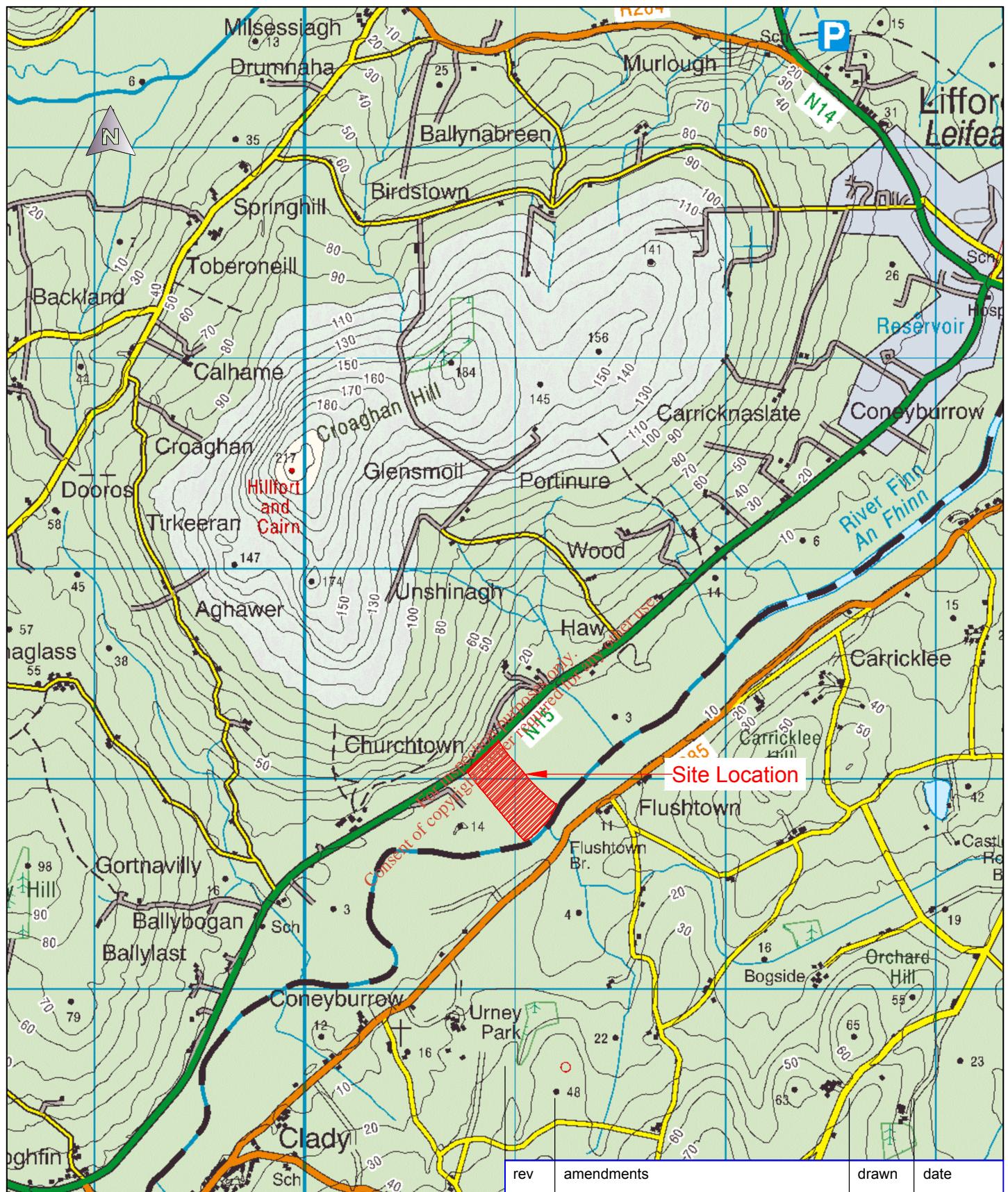
A.1.12 Seveso II Regulations.

The EC (Control of Major Accident Hazards involving Dangerous Substances) Regulations (S.I. No. 74 of 2006) do not apply to the proposed activity.

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Appendix A.1 Drawings

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|--|------------------|--|------------------------|
| Project Churchtown Licence Review | | Title Churchtown Landfill Site Location | |
| Client  Comhairle Contae Dhún na nGall Donegal County Council | | Architect | |
| Drawing Status Preliminary | Sheet Size A4 | Drawing Scale 1:50.000 | Project Leader AMcG |
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