

 <p>Environmental Protection Agency An Ghníomhaireacht um Chaomhnú Comhshaoil</p>	OFFICE OF ENVIRONMENTAL SUSTAINABILITY
ENVIRONMENTAL LICENSING PROGRAMME	
TO:	Eimear Cotter, Director
FROM:	Brian Meaney, Inspector, Environmental Licensing Programme
DATE:	27 September 2018
RE:	Technical amendment to waste licence register number W0034-02 held by Louth County Council in respect of Dundalk landfill. Change request reference number: CR03343

On 31/1/2017 Louth Counth Council requested a technical amendment to the waste licence (W0034-02) for the Dundalk Landfill. The request relates to a proposal to install a new foul sewer emission point for which permission has been obtained from Irish Water.

This memo recommends that the change may be accommodated by a Technical Amendment, in accordance with Section 42B of the Waste Management Act 1996 as amended.

1. Background

Dundalk Town Council was granted a waste licence (W0034-01) in April 2001. The licence was reviewed (W0034-02) in March 2005. There have been three technical amendments – two in 2005 and one in 2013, the latter for the EO Groundwater Regulations.

The landfill is closed and has been restored. A civic waste facility operates within the licence boundary.

2. Technical Amendment request

The technical amendment request concerns the discharge of leachate to sewer. An existing emission point specified in the licence is no longer used. A new emission point is sought for authorisation. The licensee has Irish Water's consent to discharge at the new location. Irish Water have specified no emission limit values or volume limits on the discharge. The discharge is generally low in volume and strength, comprising as it does leachate seepage and surface run-off. The discharge commenced in December 2017.

3. Consultation with the Office of Environmental Enforcement (OEE)

I have consulted with the OEE Dublin team in relation to this technical amendment request. The OEE confirmed that changed sewer discharge location cannot be accommodated under the existing licence. There are no legal proceedings in train.

4. Assessment

The principle of a sewer discharge is already established in the licence. The new sewer discharge will, to all intents and purposes, replace the sewer discharge that is authorised in

the licence but has been discontinued. The nature of the effluent is the same comprising a mixture of leachate seepage and surface run-off. The sewer will carry effluent to the Dundalk waste water treatment plant, the discharge from which was authorised by the EPA in December 2010 by licence register number D0053-01.

Routine leachate analysis carried out by the licensee at the landfill shows a leachate that contains chemical contamination, but concentrations are generally very low when compared to values published in the EPA's Landfill Operational Practices manual. The actual discharge to sewer also includes some surface run-off so some dilution will be seen, but the pollutant mass load will be the same.

According to the licensee, volumes of liquid discharged to the sewer are very low. Some 70m³ were discharged in the first 7-8 weeks of the discharge (December 2017 to January 2018).

The waste water discharge licence at Dundalk limits the discharge into Dundalk Bay of a list of nine heavy metals such that the concentration of each one in the shellfish water in Dundalk Bay will not exceed a level that gives rise to harmful effects on shellfish or their larvae. The synergistic effects of the metals must also be taken into consideration. This limitation was introduced into the waste water discharge licence by technical amendment in 2014.

An appropriate assessment was carried out for the 2010 waste water discharge licence and concluded that no significant adverse impacts are likely in the Dundalk Bay SAC and SPA. An appropriate assessment screening for the technical amendment of D0053-01 concluded in June 2014 that the activity will not have a significant effect on a European site because the proposed amendments to the licence would not result in a material change to the nature or volume of the discharges from the agglomeration.

According to the AER for D0053-01 for 2016, the discharge from Dundalk waste water treatment was not compliant with nutrient limit values (P and N). The AER for 2013 indicates that environmental quality standards are being exceeded for zinc and chromium. The AER for 2013 examines the shellfish issue from the perspective of microbiological contamination. The AER for 2016 states that Irish Water have in place monitoring and acceptance procedures for the intake of landfill leachate at the waste water treatment plant.

5. Appropriate Assessment

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activity, individually or in combination with other plans or projects is likely to have a significant effect on any European site. The screening is documented in the recommended technical amendment.

The following table lists the European sites assessed, their associated qualifying interests and conservation objectives.

European Site	Distance from facility	Qualifying interests (*denotes a priority habitat)	Conservation objectives
Dundalk Bay SAC [000455]	Adjacent	1130 Estuaries 1140 Mudflats and sandflats not covered by seawater at low tide 1220 Perennial vegetation of stony banks	As per NPWS (2011) Conservation Objectives: Dundalk Bay SAC 000455 and Dundalk Bay SPA 004026. Version 1.0. National Parks and Wildlife

		<p>1310 <i>Salicornia</i> and other annuals colonizing mud and sand</p> <p>1330 Atlantic salt meadows (Glauco-Puccinellietalia <i>maritima</i>)</p> <p>1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>)</p>	Service, Department of Arts, Heritage and the Gaeltacht. Dated 19/7/2011.
Dundalk BAY SPA [004026]	Adjacent	<p>A005 Great Crested Grebe <i>Podiceps cristatus</i> wintering</p> <p>A043 Greylag Goose <i>Anser anser</i> wintering</p> <p>A046 Light-bellied Brent Goose <i>Branta bernicla hrota</i> wintering</p> <p>A048 Shelduck <i>Tadorna tadorna</i> wintering</p> <p>A052 Teal <i>Anas crecca</i> wintering</p> <p>A053 Mallard <i>Anas platyrhynchos</i> wintering</p> <p>A054 Pintail <i>Anas acuta</i> wintering</p> <p>A065 Common Scoter <i>Melanitta nigra</i> wintering</p> <p>A069 Red-breasted Merganser <i>Mergus serrator</i> wintering</p> <p>A130 Oystercatcher <i>Haematopus ostralegus</i> wintering</p> <p>A137 Ringed Plover <i>Charadrius hiaticula</i> wintering</p> <p>A140 Golden Plover <i>Pluvialis apricaria</i> wintering</p> <p>A141 Grey Plover <i>Pluvialis squatarola</i> wintering</p> <p>A142 Lapwing <i>Vanellus vanellus</i> wintering</p> <p>A143 Knot <i>Calidris canutus</i> wintering</p>	

		A149 Dunlin <i>Calidris alpina</i> wintering A156 Black-tailed Godwit <i>Limosa limosa</i> wintering A157 Bar-tailed Godwit <i>Limosa lapponica</i> wintering A160 Curlew <i>Numenius arquata</i> wintering A162 Redshank <i>Tringa totanus</i> wintering A179 Black-headed Gull <i>Chroicocephalus ridibundus</i> wintering A182 Common Gull <i>Larus canus</i> wintering A184 Herring Gull <i>Larus argentatus</i> wintering A999 Wetlands & Waterbirds	
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6. Recommendation

I recommend that the licence amendment be approved as set out in the attached Recommended Technical Amendment. The making of the amendment will not result in the relevant requirements of Section 40(4) of the Waste Management Act 1996 as amended ceasing to be satisfied.

Signed,



Environmental Licensing Programme