

Eve O'Sullivan

Subject: Draft Cert. of Authorisation - H0210-01- Landfill at Carrigeen, Clane, County Kildare
Attachments: epa h0210 01 carrigeen.pdf

From: Brian O'Gorman [mailto:bogorman@kildarecoco.ie]
Sent: 07 May 2019 15:00
To: Wexford Receptionist <REC_WEX@epa.ie>
Subject: Draft Cert. of Authorisation - H0210-01- Landfill at Carrigeen, Clane, County Kildare

Ms. Eve O'Sullivan
Programme Officer
Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency

I refer to above and your correspondence dated 12th April last.

I attach the Council's response herewith.

Is mise le meas,

Brian O'Gorman
AO, Environment

Kildare County Council
Tel.: 045 980576/980588
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7th May, 2019

Ms. Eve O'Sullivan
Programme Officer
Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
County Wexford

***Draft Certificate of Authorisation- H0210-01
Legacy Landfill Site at Carrigeen, Clane, Co. Kildare***

A Chara,

Kildare County Council (KCC) wish to make the following representations regarding the Draft Certificate of Authorisation H0210-01 issued in respect of the Closed Landfill at Carrigeen, Clane, Co. Kildare.

- Condition 3.1 requires that the Remediation of the site would be carried out within 12 months of the date of grant of the CoA, or as otherwise agreed by the Agency. The Council intend to immediately commence the process of tendering and appointing a consultant, preparing detailed design documents for the works, tendering for and appointing a contractor, including complying with all relevant statutory requirements, and will endeavour to meet this deadline. It is expected, however, that an extension of time may have to be sought to complete the measures.
- Condition 3.1(a) requires the installation of a gas collection trench around the waste body perimeter with a series of gas ventilation pipes. KCC wish to have it clarified if the line of the trench should instead be as illustrated in Figure No. 5.1 RevA 'Gas Collection Trench', as submitted in the O'Callaghan Moran (OCM) Tier 2 and 3 Environmental Risk Assessment Report, October 2018, submitted as part of the application process? OCM had proposed the line of the gas trench to minimise disruption to the grounds of the private residential dwelling. It was also the justification for proposing 3 vertical ventilation wells to the west of the cut off trench, but within the quarry footprint, which it is noted are required by Condition 3.1(c).
- Condition 3.5 requires the biannual sampling of leachate, surface waters and ground waters on, and in the vicinity of the landfill, the biannual visual inspection of the site, and the quarterly sampling of landfill gas. KCC propose that the frequency of such monitoring is excessive and requests that it be reviewed considering annual monitoring results and trends taken over the last number of years.
- With regard to the monitoring of surface waters, groundwaters, leachate and landfill gas, please confirm the schedule list of parameters for which each should be tested. KCC propose the following list of parameters:

- Surface Waters:
pH, Electrical Conductivity, Dissolved Oxygen, Total Suspended Solids, Heavy Metals (As, Ba, Cd, Cr, Cu, Hg, Mn, Ni, Pb, Fe and Zn), Total alkalinity, Ammoniacal Nitrogen, Total Oxidised Nitrogen (TON), Chloride, Sulphate, Ortho-Phosphate, MR-Phosphate, Total Cyanide, Potassium, Sodium, Calcium, Magnesium, Biological Oxygen Demand, Chemical Oxygen Demand.
 - Groundwaters and Leachate:
pH, Electrical Conductivity, Arsenic, Cadmium, Chromium, Copper, Lead, EPH, Manganese, Mercury, Nickel, Potassium, Sodium, Zinc, Chloride, Cyanide, Ortho P, Sulphate, Ammonia, BOD, COD, TOC
 - Landfill Gas:
Methane, Carbon Dioxide, Oxygen
- Condition 3.5(e) requires for the monitoring of 2 downgradient groundwater boreholes. KCC propose to sample BH01 and BH02, as shown in Figure 3.1 'Monitoring Locations', in the aforementioned OCM Report to fulfil this requirement.
 - Condition 3.7 details trigger levels in relation to surface emissions measured over the waste body. Please confirm if such monitoring is required, and at what frequency.
 - KCC would like to reiterate that the Closed Landfill in Carrigeen, although originally operated by the Council as a municipal facility, was never in public ownership and remains privately owned. Part of the site is currently used by one of the landowners as a paddock for horses and also includes a small sand arena. Could the CoA provide for some flexibility in the final remediation design to allow for KCC to negotiate the details with the landowners. Any changes would not compromise the integrity or standard of the current proposal and would be submitted to the Agency for prior approval.

All correspondence regarding this Certificate of Authorisation should be forwarded to Yvonne Murray, Environment Section- Tel.: 045 980588

Is mise le meas,



Liam Dunne
SEO, Environment

P.P.