



Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick City**  
& County Council

Seirbhísí Pleanála agus Comhshaoil,  
Comhairle Cathrach agus Contae Luimnigh,  
Tuar an Dail,  
Luimneach

Planning and Environmental Services,  
Limerick City and County Council,  
Dooradoyle,  
Limerick

EIRCODE V94 WV78

**Planning & Environmental Services**  
**File Ref: 24-18**

t: +353 (0) 61 556 000  
f: +353 (0) 61 556 001

23<sup>rd</sup> May 2019



Administration,  
Environmental Licensing Programme,  
Office of Environmental Sustainability,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle Estate,  
Co Wexford

**Application for a Certificate of Authorisation for Knocknacarriga Landfill as per Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations, 2008. SI No. 542 of 2008**

**Ref: H0277-01**

Dear Sir/Madam,

Please find enclosed Limerick City and County Council's response to the notice issued by the EPA in accordance with Regulation 7(4) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008, in relation to the application for a Certificate of Authorisation for closed Landfill at Knocknacarriga, Cappamore, Co. Limerick.

I enclose one original plus one copy and a CD-ROM copy.

If you have any queries in relation to the above please contact **Ursula Ahern, Assistant Scientist, Planning & Environmental Services** at (061) 556592

Yours faithfully,

**Ursula Ahern**  
**A/Executive Scientist**  
**Planning & Environmental Services.**

## Revised Non-technical Summary

Knocknacarriga Landfill Reg. No. H0277-01

Date: 23<sup>rd</sup> May 2019

### Background

Limerick City and County Council applied for a Certificate of Authorisation from the EPA on 12 March 2019.

This report is Limerick City and County Council's response to the Notice issued by the EPA in accordance with Regulation 7(4) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008.

### Point 1.

Limerick City and County Council are aware of the discrepancies in the site boundary in the application. The map titled "Sub soils" form part of the EPA Risk Assessment and Maps that were inputted as part of the Tier 1 Risk Assessment. The correct boundary for the site is in drawing ref. K-01 which was confirmed during the Tier 2 Risk assessment. Limerick City and County Council have been unable to amend the EPA risk assessment maps and are currently in contact with the Agency on this matter.

I attach a drawing Ref: K-01 Rev.1 showing the extent of the waste, outlined in black.

### Point 2 & 3

As site inspection was carried out with the landowner on 22<sup>nd</sup> May 2019 and the findings are as follows.

On consultation with the landowner, he stated that this area is never covered in water or inaccessible at any time of the year. By definition a wetland is an area of land that is saturated with water either permanently or seasonally, and where the water table is near or at the surface.<sup>1</sup>

On discussion with the landowner and observing site conditions during our site inspection Limerick City and County Council are of the opinion that this area does not fall under the definition of a natural wetland. I attach photographs taken in Appendix 1.

In addition, The EPA Code of Practice, Environmental Risk Assessment for Unregulated Waste Disposal sites states that:

"Wetlands receive a particular mention in the Ministerial Direction (04/05) in the context of illegal waste activities and an assessment of the potential impacts should be undertaken in all cases where a wetland (including locally important undesignated wetlands) is present on or adjacent to a site where illegal waste activity has been discovered"

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<sup>1</sup> Irish Ramsar Wetlands Committee, 2018. Irish Wetland Types – an identification guide and field survey manual. EPA, Johnstown Castle, Ireland. ISBN: 978-1-84095-740-2

The site at Knocknacarriga is classed as an Historic unregulated waste disposal site (closed landfill). A historic unregulated waste disposal site is defined as one that were operating between 1977 and 1997

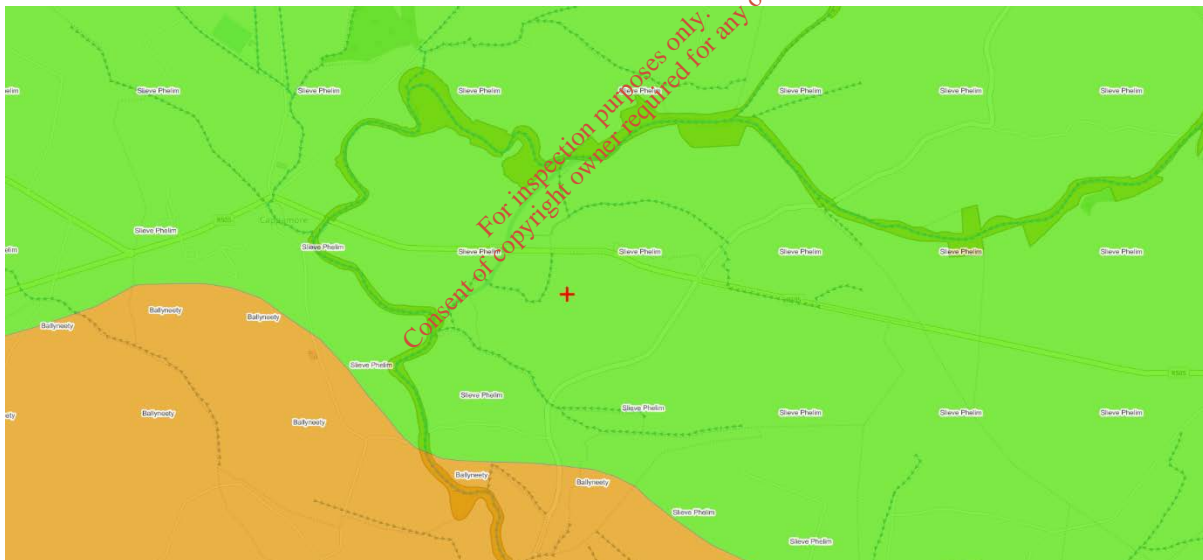
Illegal landfills are defined in the Code of practice as operating since 1997.

In order to complete our investigation Limerick City and County Council enquired from the landowner where the drainage ditch discharges to and whether there is a hydrological connection between the ditch and any surface water body . I attach a map in Appendix II showing the discharge route the drainage ditch follows and photograph in Appendix I showing the final discharge location. The route was mapped and it covers approx. 2 km and the final discharge is an overflow river of the River Bilboa

The drainage drain located at the north east of the waste body on the day of our inspection had a minimal flow and a small amount of water was observed in the drainage ditch (photograph in appendix 1)

**Point 4:**

The Groundwater bodies risk map of the site shows the site to be in an area not at risk . Taken from <https://gis.epa.ie/EPAMaps/>



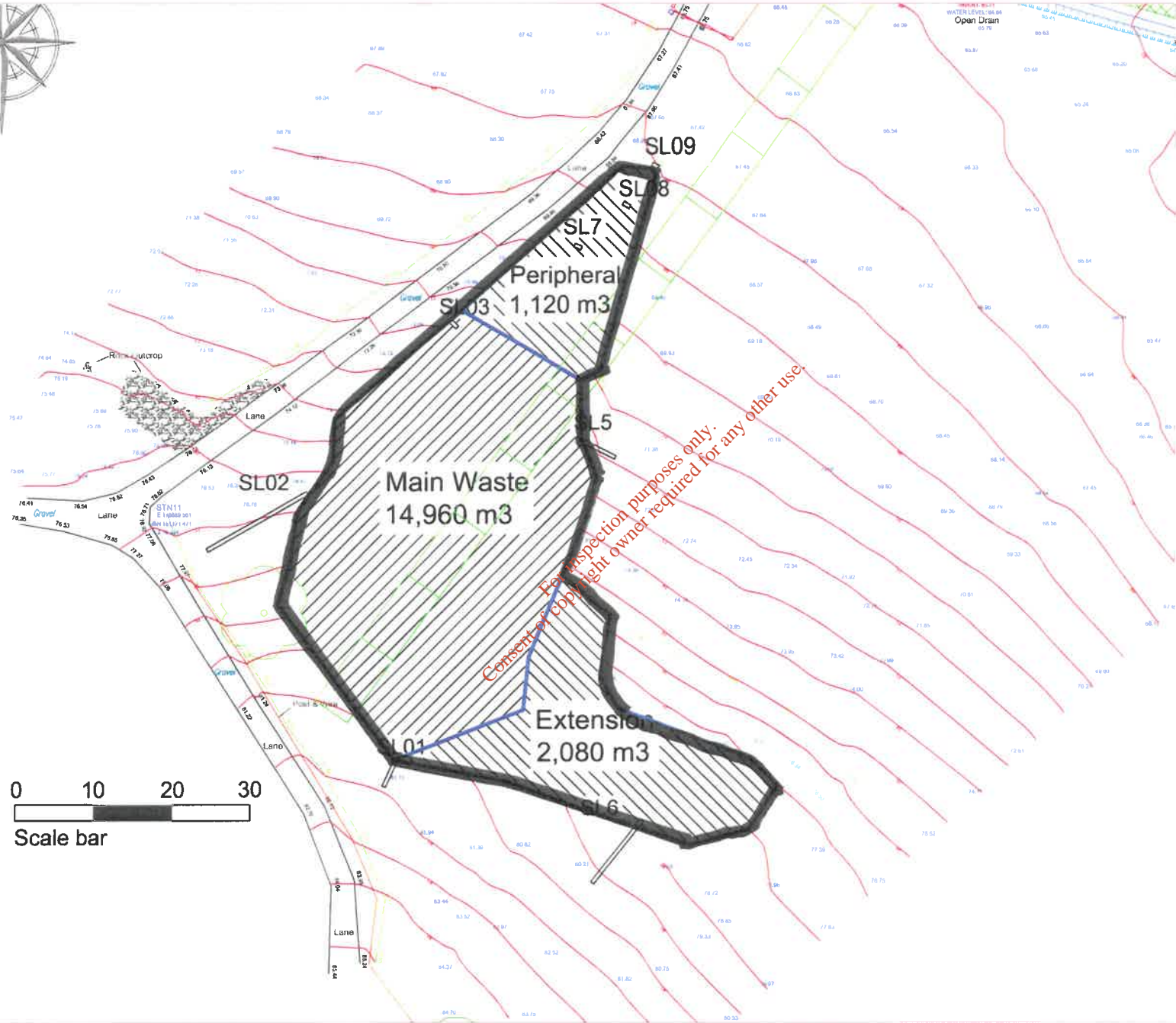
Code	Name	Projection
IE_SH_G_213	Slieve Phelim	Not at risk

**Pont 5:**

The Agency contacted Limerick City and County Council by telephone requesting clarification on the reference in the Tier 3 report regarding the regrading of the land along the eastern perimeter of the waste to remove a 0.5 metre high ridge. This area runs right up to the perimeter of the waste and although not part of the waste body it will need to be regraded in line with the proposed

remediation works on site. The reason for regrading outside the waste body is to ensure the area is accessible by tractor for the farmer and in turn minimise any Health & Safety risk. Limerick City and County Council propose to carry out a full topographical survey of the site before any works take place.

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**Limerick City and County Council**  
**Dooradoyle**  
**Limerick**

**Title :Extent of Waste**

**Project: Knocknacarriga**  
**Historic Landfill**

**Dwg. Ref: K-01 – Rev 1.**

**Date 23/5/2019**

**Original dwg. K-01**

**Date: 10/06/13**

**Scale: 1:500 @A3**





Photograph 1: Photograph of poorly drained land (site inspection 22/5/19)



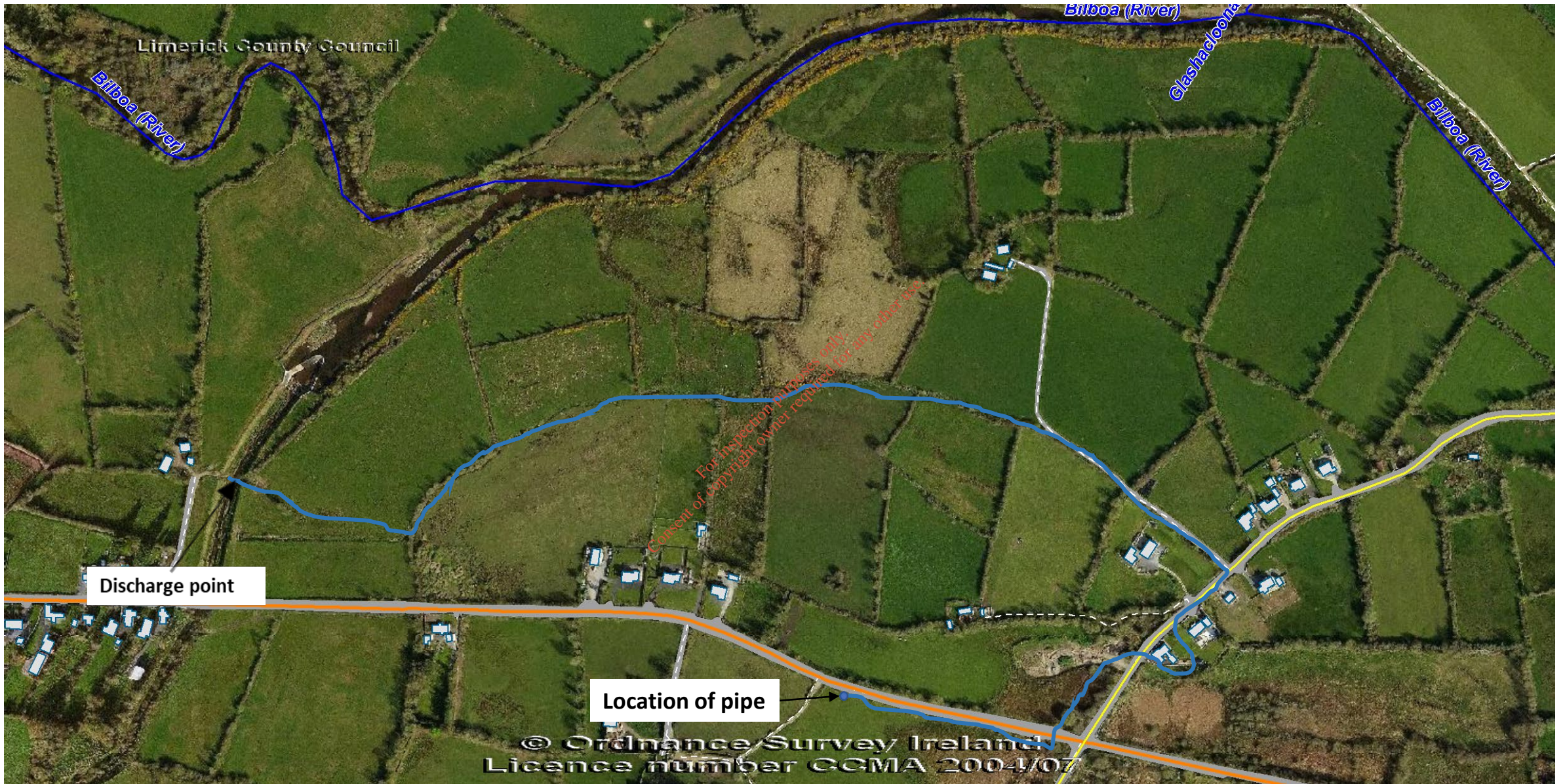
Photograph 2: Pipe (Site inspection 22/5/19)



Photograph 3: Discharge point (site inspection 22/5/19)

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Appendix II : Discharge Route from Pipe to Surface water body