

Mr. David Flynn,
Programme Manager, Licencing,
Environmental Protection Agency,
McCumiskey House,
Clonskeagh,
Dublin 14.

5th March 2019

MOR Ref: E1172.TAWAC.01

By Email

Re: Technical Amendment Request W0254-01 – Change to Waste Acceptance Limits

Dear Mr. Flynn,

We are acting on behalf of the licensee Walshestown Restoration Limited (WRL), a waste management facility for the acceptance, processing, recovery and disposal of imported waste material. The facility operates under the EPA Waste Licence Register number W0254-01 in Walshestown, Naas, County Kildare.

WRL wish to apply for a Technical Amendment to Waste Licence register number W0254-01 in relation to the waste acceptance limits, which currently apply at the facility.

Background

Malone O'Regan Environmental (MOR) submitted a request (LR035254) dated 14th June 2018 to the Agency in relation to a proposed increase to the waste acceptance criteria for all parameters at the facility to three times the limit specified in the EC Council Decision (2003/33/EC).

The MOR submission (LR035254) was accompanied by a Hydrogeological Risk Assessment, which utilised LandSim to demonstrate that the predicted concentrations in groundwater do not exceed selected water quality standards when concentrations in the waste input are increased.

The Agency did not approve this for the facility due to the following –

“The licensee is reminded that an increase of the limits is to be considered on a source case-by-case basis, not on a recipient site case-by-case basis.”

Recent EPA Decision on a Similar Waste Licence

It has been brought to our attention that on the 31st January 2019, the Agency technically amended a waste licence (register number W0129-02) for an active inert landfill facility, located in Hollywood Great, the Naul, Co Dublin. The approved Technical Amendment included increasing Waste Acceptance Criteria (WAC) or parametric limits for selected parameters (sulphate, chloride, antimony, selenium, molybdenum, arsenic and Total Dissolved Solids (TDS)) to three (3 No) times the limit specified in the EC Council Decision (2003/33/EC) and further the parametric limit of Total Organic Carbon (TOC) was increased to up to two (2 No) times the EC Council Decision (2003/33/EC) inert limit.

Technical Amendment Request

This submission relates to soil and stone (EWC 17 05 04) and Dredging Material (EWC 17 05 06).

The Hydrological Risk Assessment prepared by MOR in June 2018 comprised LandSim modelling in order to quantitatively assess the unlikely risk to groundwater arising from leakage of leachate through the basal liner of the proposed engineered inert landfill at the Site. The modelling demonstrated that even if all the waste imported had initial leachate concentrations of three times the inert WAC for metals (arsenic, barium, cadmium, total chromium, copper, lead, mercury, molybdenum, nickel, tin, selenium and zinc), chloride, fluoride and sulphate the risk to groundwater would still remain acceptable.

Based on this detailed technical evaluation it is considered that the Site specific WAC for these substances could be increased to three (3 No) times the inert WAC values.

LandSim modelling cannot be undertaken for TDS or TOC but increasing the Site specific WAC for these determinands can be justified as follows:

- TDS - the LandSim modelling demonstrated that increasing the Site specific WAC for chloride and sulphate to three times the WAC did not result in an unacceptable risk to water resources. These determinands are major contributors to TDS and so it is reasonable to assume that increasing the Site specific WAC for TDS to three (3 No) times the WAC will also not result in an unacceptable risk to water resources.
- TOC - has a standard WAC limit under the 2003 EC Council Decision of 30,000 mg/kg in the solid (soils) material. The EC Council Decision allows, in the case of soils, a higher limit value of up to two times the standard limit to be admitted if the competent authority gives permission, provided the Dissolved Organic Carbon (DOC) value of 500 mg/kg is achieved at L/S = 10 l/kg. In terms of risk to groundwater, DOC is the risk driver, rather than TOC. It is therefore proposed that the Site Specific WAC for TOC is increased to two (2 No) times the inert WAC value on the condition that the Site Specific WAC for DOC remains as 500 mg/kg (L/S = 10 l/kg).

Such risks are unlikely ever to arise as the compacted clay base liner will be constructed in strict accordance with a specification approved by the Agency.

We respectfully request that the Agency approves this request in a timely manner, as currently the Integrated Material Solutions facility in the Naul, Co Dublin has a distinct competitive advantage in the market place.

Should you have any queries or comments in relation to the above proposals, please do not hesitate to contact the undersigned.

Yours sincerely,

for **Malone O'Regan**



Thomas Vainio-Mattila