

Eve O'Sullivan

Subject: FW: Castlerea Landfill - Reg No H0394-0
Attachments: Submission on Draft Cert of Authorisation H0394-10.pdf

From: Pat Murtagh <PMurtagh@roscommoncoco.ie>
Sent: Monday 2 November 2020 15:48
To: Licensing Staff <licensing@epa.ie>
Cc: Liam Bergin <LBergin@roscommoncoco.ie>; Annemarie Johnston <AJohnston@roscommoncoco.ie>
Subject: Castlerea Landfill - Reg No H0394-0

Re: Notification in accordance with Remediation 7(5) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008, of a draft Certification of Authorisation in respect of the application for Certificate of Authorisation for Castlerea Landfill at Cloondacarra Ben, Castlerea, County Roscommon

A Chara,

I refer to the above and I attach Roscommon County Councils representations to the draft Certificate of Authorisation for your attention.

I should be obliged to receive an acknowledgement of our representations.

Mise, le meas,

Pat Murtagh,
Senior Executive Officer,
Environment, Corporate, Assets, Energy Management & Climate Change,
Roscommon County Council,
Aras an Chontae,
Roscommon.
F42 VR98.

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Comhairle Contae
Ros Comáin
Roscommon
County Council



EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford,
Ireland.

2nd November 2020.

Re; Draft Certificate of Authorisation - Reference Number H0394-10

A Chara,

I refer to the above Draft Certificate of Authorisation in relation to Castlerea Historic Landfill and I wish to make the following representations in relation to elements of same as follows:

- 1. Condition 2.4 Environmental Liabilities** *The local authority shall put in place and maintain a financial provision for costs of likely events or accidents/ incidents related to the closed landfill and associated works.*

What financial provision is required, considering the site is closed over 20 years, a risk assessment for the site has been undertaken & remediation works proposed. Roscommon County Council will ensure any contractor(s) engaged to undertake the remediation works will have adequate insurance in place to cover any incidents/accidents that may arise during restoration.

- 2. Condition 3.1 (b)** - *'Install a low permeability landfill cap, minimum 1m, with 1mm thick low permeability geomembrane having a hydraulic conductivity of less than or equal to $1 \times 10^{-9} \text{m/s}$ '*

The findings of the "Updated Tier 2 & Tier 3 report" (Sept 2019) in particular Section 3.4.5 states: Two samples of the capping material were collected for permeability testing. Sample 1 from the A1 area and Sample 2 from the A2 area. The samples were sent to National Materials Testing Laboratory Ltd in Carlow for Constant Head Triaxial permeability Testing. The laboratory report is in Appendix 5. Sample 1 had a permeability of $1.002 \times 10^{-9} \text{m/s}$ while Sample 2 had a permeability of $7.727 \times 10^{-10} \text{m/s}$. The results confirm that the capping material is suitable for use as landfill capping material and can be compacted to meet the non-hazardous landfill capping permeability requirements.

For a low risk site in Limerick (Knocknacarriga) the Tier 3 report recommended *Remove existing topsoil. Install Geogrid to prevent upward migration of waste. Place 350 mm of subsoil. Place 300 mm of topsoil across the site and reseed grass.* The draft CoA required the same as has been stated for Castlerea - LCCC commented on this & the final CoA stated: *Install a low permeability landfill cap, minimum 1m, with 1mm thick low permeability geomembrane, or equivalent, to achieve a hydraulic conductivity of less than or equal to $1 \times 10^{-9} \text{m/s}$.*

Roscommon County Council contends that the same standard should apply to the Castlerea Landfill given the results of the Updated Tier 2 and Tier 3 report referred to above and the low risk status of the Castlerea Historic Landfill.

3. Condition 3.1 - The local authority shall implement the following measures within 18 months....

Condition 3.1 (g) - The local authority shall, within 6 months of the date of grant of this CoA, carry out a gas pumping trial.

Condition 3.1 (h) – Within one month of the completion of the gas pumping trial... submit a report...

Condition 3.5 – the validation report shall be submitted to the Agency within 30 months of the date of grant...

The timeframes specified in relation to the undertaking of the works may be an issue considering the gas pumping trials required, finalisation of the remediation proposal, planning consent requirements, preparation of tender documents, securing contractor(s) & securing of DCCAE funding.

4. Condition 3.1 (c) – Install four gas vent pipes within the waste body. The gas venting pipes shall meet the following requirements

(i) There shall be a fan on each gas venting pipe:

(ii) The gas vent pipes shall not be perforated above the ground level

Condition 3.1 (g) - The local authority shall, within 6 months of the date of grant of this CoA, carry out a gas pumping trial.

What happens if the gas pumping trial identifies that gas venting is not appropriate?

5. Condition 3.8 (b) Monitoring (sample, analyse, characterise, and measure the level) on a quarterly basis of leachate in all leachate monitoring boreholes

No parameters are specified.

6. Condition 3.17.2 – The Communications Programme shall inform members of the public what they can and should do to protect their property and health.

As the remediation measures proposed removes the risks identified there are no measures required to be taken by the public.

I trust you will give these representations your consideration and should you have any questions/queries in relation to them please contact Pat Murtagh, SEO Environment at pmurtagh@roscommoncoco.ie or at 09066 37173

Mise, le meas,



Liam Bergin,
Director of services