

Mr. Killian Farrell,
Environment – Climate Change & Agriculture Section,
Mayo County Council,
Aras an Chontae,
Castlebar,
Co. Mayo.

27th November 2020

Reg. No. H0319-01

Re: Claremorris Historic Landfill – Notice in accordance with Regulation 7(4) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations, 2008

Dear Mr. Farrell,

I am to refer to the above referenced application for a certificate of authorisation in relation to the above referenced historic landfill.

Having examined the foregoing, I am to advise that the Agency is of the view that the application does not comply with Regulation 7(2) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations, 2008.

You are therefore requested in accordance with Regulation 7(4) of the Regulations, to take steps to supply the information detailed below:

REGULATION 7(2) COMPLIANCE REQUIREMENTS

1. Provide a Non-Technical Summary requested in Section A of the Application Form.
2. Provide two documents that relate to the Qualified Person required under Section 2.3 of the EPA Code of Practice – Environmental Risk Assessment for Unregulated Waste Disposal Sites.
3. Section B of the Application Form states that the applicant is the landowner of the site however, Section 1 of Tier 3 Assessment states that the site is currently under private ownership. State the owner of the site.
4. The site boundary shown in Drawing Number P2348-0400-0001 of Tier 3 Assessment differs from the site boundary in Drawing annotated as “EPA Risk ranking Report S22-02588” of ‘Claremorris Historic Landfill Pilot Project Tier 2 Investigation 2010’ report. Provide, or refer to, a drawing that shows the correct site boundary.
5. Considering that waste was found in slit trenches ST01, ST02, ST03 and ST06, which are outside the site boundary, provide reasoning for not extending the site boundary to include these locations.

6. Table 6-1 of Tier 3 Assessment gives an assumption that the site was operational through the 1970s and states that the anecdotal evidence suggests that the landfilling activities ceased in around 1980. It is noted however that Section B of the Application Form states that the landfill was operational from circa 1982 to circa 1996. State the operational period of the landfill.
7. Waste sampling results show that hazardous waste acceptance criteria (WAC) was reached for Dissolved Organic Carbon, Total Organic Carbon and Loss on Ignition, as shown in Table 4-1 of Tier 3 Assessment. State the cause of the criteria for hazardous waste being reached for these parameters. Please state types of hazardous waste deposited.
8. The site investigations show that the base of waste was not reached in trial pits TP01, TP02, TP04 and TP06 and that waste was found outside the site boundary in the slit trenches listed under Point 5 above. State how the total amount of waste deposited, stated to be approximately 191,000 tonnes, was calculated and whether this calculation reflects the fact that the base of waste was not reached at the said trial pits and that waste was found outside the site boundary. Please include also the volume for the total amount of deposited waste in m³.
9. Seven trial pits were dug out within the site, as shown in Figure 3.1 of Tier 3 Assessment. It is noted that trial pit TP01 is located 80m from TP02 and 85m from TP03, while other trial pits are located at a shorter distance from each other, for example TP04 and TP07. Provide justification on the trial pit distribution and why more trial pits were not dug considering the extent of the site.
10. Section 3.1.5 of Tier 3 Assessment states that the maximum anticipated waste footprint is presented in Figure 3.3. However, Figure 3.3 is not included in the Assessment. Please provide a drawing showing the extent of the waste body.
11. The applicant proposes that future surface water monitoring is carried out at locations shown in Drawing No. P2348-0400-0001. However, due the fact that groundwater flows towards south/south-east, as indicated in Figures 4.2 and 4.3 of Tier 3 Assessment, and the landfill leachate may potentially migrate via groundwater into the said Kilbeg-Malone River, the monitoring location SW5, as shown in the drawing, may not reflect the actual impact from the deposited waste on the river. Accordingly, please propose an additional surface water monitoring location (SW6), southeast of the landfill. Provide an updated drawing showing all surface water monitoring locations.
12. Section 4 of Tier 3 Assessment states that surface water was monitored at two locations in 2009. Provide results of this monitoring. Please also carry out surface water monitoring upstream and downstream of the closed landfill. Please have regard to parameters listed in *European Communities Environmental Objectives (Surface Waters) Regulations, 2009, as amended*.
13. It is noted that gas monitoring was carried out at one location within the waste body (BH01) and one location outside the waste body (BH02) in 2010. Please carry out gas monitoring at the existing monitoring locations BH01, BH02 and at least two additional locations within the waste body.
14. It is noted that groundwater monitoring was undertaken at location BH02 on 2nd December 2010 and the measured parameters were Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Faecal and Total Coliforms. Please carry out groundwater monitoring upgradient and downgradient of the waste body, having regard to parameters listed in *European Communities Environmental Objectives (Groundwater) Regulations, 2010, as amended*. Please note that the upgradient and downgradient monitoring locations must be representative of the actual footprint of the

deposited waste on groundwater, considering that the groundwater flows towards south/south-east.

15. It is noted that leachate monitoring was carried out at location BH01 on 2nd December 2010 and the measured parameters were BOD and COD. Please carry out leachate monitoring at BH01 and at least two additional locations within the waste body, having regard to parameters listed in *European Communities Environmental Objectives (Groundwater) Regulations, 2010, as amended*.
16. Provide a map showing the proposed surface water drainage system. Include locations where the surface water drains discharge to.

Your reply to this notice should include a revised non-technical summary, which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Please supply the information in the form of one original plus one copy within *four weeks* of the date of this notice. In addition, please submit one copy of the requested information in electronic searchable PDF format on a CD-ROM to the Agency. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is H0319-01. Please direct all correspondence in relation to this matter to *Administration, Environmental Licensing Programme, Office of Environmental Sustainability, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Ewa Babiarczyk
Inspector
Environmental Licensing Programme
Office of Environmental Sustainability