

Mr. Joseph Bockarie,
Senior Executive Engineer,
South Dublin County Council,
County Hall Tallaght,
Dublin 24

D24 A3XC

19th November 2021

Reg. No. H0424-01

Re: Waterstown 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. Bockarie,

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 completed and signed Certificate of Authorisation Application Form, including a Non-Technical Summary, available for download at <https://www.epa.ie/our-services/licensing/waste/historic-landfills/>.
2. The site boundary shown in Drawing titled '*Location of Waterstown Landfill*' of the Tier 1 Risk Assessment dated October 2011 and Figure 1 titled '*Site Layout and Boundary*' of the Risk Assessment Report dated October 2016 differ. State the reason for the differences in the extent of the site boundary in said drawing and figure and submit, or refer to, a drawing/figure that shows the actual site boundary.
3. The Walkover Survey Checklist dated 9th April 2009 states that the size of the site is 25.17ha. Section 1 of the said Risk Assessment states that the site covers an area of approximately 20ha. State the actual size of the site.
4. Drawing No. 12073_07 titled '*Conductivity Interpretation & Summary*' of the Geophysical Survey Report and Drawing No. 14b titled '*Inferred extent of waste body*' of the Exploratory Site Investigation Report indicate that the waste body extends beyond the site. However, Drawing No. 11 titled '*Inferred extent of waste body*' of the said Risk Assessment indicates that

the waste body is within the site boundary. Accordingly, please provide the following information:

- (i) State the reason for the differences in the extent of the waste body in the said drawings and submit, or refer to, a drawing that shows the actual extent of the entire waste body.
 - (ii) State the size of the waste body within the site and, if applicable, the size of the waste body outside the site in hectares.
5. It is noted that not all monitoring locations are shown in the Drawing No. 2 titled '*Site Investigation Locations with updated LFG Locations*' of the said Risk Assessment. For example, the location of trial pit TP02 and groundwater monitoring well MW05 are not shown in the drawing. It is also noted that the drawings referred to in Point 4 are not showing the site boundary.

Accordingly, please provide one drawing showing all of the following elements interpolated:

- (i) all leachate, groundwater, gas and surface water monitoring locations;
 - (ii) all trial pit locations;
 - (iii) the boundary showing the extent of the entire waste body; and
 - (iv) the entire site boundary.
6. Section 7 of the said Risk Assessment states that the site is capped with approximately 1m of low permeability clays and Section 4.1 of the same document states that the quantity of the existing landfill cover material is in the region of 300,000m³. It is noted that four samples were taken from the existing cover material at locations BH2, BH3, BH5 and BH11. Confirm if the entire cover material is composed of clay and its permeability is adequate for a landfill cap.
7. It is noted that four monitoring wells (BH2, BH8, BH10 and BH11) were monitored between 13th December 2012 and 5th May 2015. Please repeat the monitoring carried out in these monitoring wells.
8. It is noted that six monitoring locations (SW1, SW2, SW3, SW4, SW5 and SW6) were monitored between 12th December 2012 and 7th May 2015. Please repeat the monitoring carried out at these monitoring locations.
9. It is noted that nine monitoring wells (MW4 to MW12) were monitored between 13th December 2012 and 6th May 2015. Please repeat the monitoring carried out in these monitoring wells.
10. It is noted that seventeen monitoring wells (BH1 to BH17) were monitored between 20th December 2012 and 20th April 2016. Please repeat gas monitoring in these wells.
11. State whether hazardous waste was deposited within the landfill. Classify any such waste in accordance with *EPA Waste Classification, List of Waste & Determining if Waste is Hazardous or Non-hazardous, applicable from 5th July 2018*.
12. Considering the fact that municipal waste and C&D waste, was deposited within the site and leachate and gas are still being generated (for example methane at monitoring location BH6 within the waste body was measured at 49.4 % v/v during the monitoring on 12th June 2015), state the reason for not proposing an engineered cap and a gas management system for the closed landfill.
13. Provide a graphical figure showing a conceptual site model for Waterstown Landfill. Please refer to Figure 6 of the *EPA Code of Practice Environmental Risk Assessment for Unregulated Waste Disposal Sites* for an appropriate example.
14. Section 1 of the said Risk Assessment states that the site is used as a public park. State whether the site is intended to be used by South Dublin County Council or private owner(s) for other purposes.

Please ensure that the non-technical summary required in Point 1 above 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 requested information within *five weeks* of the date of this notice. Please note that during Covid-19 there are new arrangements in place for the receipt of all correspondence in relation to applications for Certificates of Authorisation. Accordingly, any correspondence in respect of the above referenced application should be sent to the Agency via file transfer by emailing licensing@epa.ie, quoting the Register Number H0424-01. The EPA doesn't accept files to be transferred using any file share application other than MS One Drive. Each file should be in a searchable .pdf format and a size not exceeding 10MB. The copying option for the file content should also be enabled.

Please also note, post Covid-19, you may be contacted to submit the hard copies and CD-ROMs for the submitted electronic correspondence.

Yours sincerely,



Ewa Babiarczyk
Inspector
Environmental Licensing Programme
Office of Environmental Sustainability