

Mr. Bernard Shea,
Environmental Section,
Longford County Council,
Great Water Street,
Longford, N39 NH56

31st March 2022

Reg. No. H0296-01

Re: Ballymulvey 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. Shea,

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. Section B.1 of the Application Form indicates that the site lies on ‘unregistered land with PRAI but owned by Longford County Council’. Clarify if ownership of the site will be registered with the PRAI.
2. Provide a letter from the Qualified Body to the Qualified Person, as required under Section 2.3 of the EPA Code of Practice – Environmental Risk Assessment for Unregulated Waste Disposal Sites.
3. Section 1.2 of the Non-Technical Summary states that the operation at the landfill ceased following a High Court Order. Provide a copy of the High Court Order.
4. The site boundary shown in Figure 1 ‘*Site Location Plan*’ of the Tier 1 Risk Assessment and Figure 2.1 titled ‘*Site Location Plan and Aerial View*’ of the Tier 2 Assessment differ. State the reason for the differences in the site boundary and submit, or refer to, a Figure that shows the correct site boundary.
5. State what waste was deposited in the area referred to as ‘*area of special precautions; area shaded to be protected to ensure that this area is not disturbed or exposed by any proposed works*’, as shown in Figure 2 ‘*Site Layout Plan*’ of the Tier 1 Assessment.

6. It is noted that the most recent surface water monitoring was carried out on 6th September 2018 and 26th September 2018 at two locations SW-C and SW-G, which are downstream of the landfill, as shown in Figure 4.3 ‘Surface Water Monitoring’ of the Tier 2 Assessment. It is also noted that no monitoring was carried out at other surface water monitoring points shown in Figure 4.3, due to being dry on the monitoring dates. It is therefore considered that the monitoring carried out in 2018 may not be reflective of the potential impact of the landfill on surface waters. Accordingly, repeat surface water monitoring at locations SW-A, SW-B, SW-C, SW-E, SW-G, SW-I, SW-H and SW-M. Please include the monitoring locations in the Drawing required under Point 13.
7. It is noted that the most recent groundwater monitoring was carried out on 26th September 2018 and 8th October 2018 at three monitoring boreholes BH1, BH2 and BH3 (also referred to by the applicant as boreholes GW01, GW02 and GW03), as shown in Figure 4.1 ‘Groundwater Flow’ of the Tier 2 Assessment. Considering the locations of the three cells with waste, as shown in Figure F061-01 ‘Existing Site Survey’ of the Tier 1 Assessment, and the direction of groundwater flow towards the south/ south-west, it is considered that the monitoring location BH3 may not be fully representative of groundwater downgradient of the waste body. Accordingly, please install an additional borehole, BH4, outside the waste body between Cell No. 2 and the south-western site boundary and carry out up-to-date groundwater monitoring in BH1, BH2, BH3 and BH4. Include the monitoring locations on the Drawing required under Point 13. Additionally, include a log for the new borehole.
8. It is noted that the most recent gas monitoring was carried out on 25th September 2018 and 8th October 2018 at three boreholes BH1, BH2 and BH3 (also referred to by the applicant as boreholes GW01, GW02 and GW03) and two boreholes within the waste body BH5 and BH6, as shown in Figure 3.1 ‘Site Investigation Location Plan’ of the Tier 2 Assessment. Accordingly, carry out up-to-date gas monitoring in accordance with the EPA Landfill Manuals – Landfill Monitoring. Please note, as per Section 7.5.2 of EPA Landfill Manuals - Landfill Monitoring, that for gas monitoring purposes within the waste body, leachate monitoring boreholes are inappropriate and, where appropriate, groundwater monitoring boreholes may be used for gas monitoring.
9. Figure 5.1 ‘The Conceptual Site Model’ of the Tier 2 Assessment indicates that industrial waste was deposited at the landfill. State the nature of this waste.
10. Referring to Drawing No. BLS-01 of the Tier 1 Assessment, provide the following information:
 - (i) State whether the network of stone filled gas trenches, which are marked in thick black lines in the drawing, have been installed.
 - (ii) State whether the six passive vents (Vents 1 to 6), as shown in Drawing No. BLS-01 or the four vents (Vents 1 to 4), as shown in Figure 2 ‘Site Layout Plan’ of the Tier 1 Assessment have been connected to the said gas trenches and are operational. If connected, submit a new drawing showing the location of the actual gas management infrastructure installed.
11. It is noted that the location of borehole BH6 differs on Figure 2 ‘Site Layout Plan’ of the Tier 1 Assessment and Figure 3.1 ‘Site Investigation Location Plan’ of the Tier 2 Assessment. Clarify which Drawing/Figure shows the correct location of borehole BH6 and confirm that this BH6 location correlates with the leachate monitoring results summarised in Tables 4.4 and 4.5 of the Tier 2 Assessment.
12. State the type of waste encountered in the trial pit TP01 and in the leachate monitoring boreholes BH5 and BH6 installed within the waste body and whether the encountered waste is representative of the entire waste body. Include the logs for boreholes BH5 and BH6. Additionally, state the maximum depth of waste and how it was established.
13. Provide one Drawing showing all of the following elements interpolated:
 - (i) the entire site boundary in red;
 - (ii) the waste body boundary, in a different colour than red, showing the extent of the areas where waste was deposited;

- (iii) the water cut-off perimeter drains and other on-site land water drains, the off-site land water drains and any other waterbodies. Each land water drain and waterbody should be shown in blue and be annotated. Please also include arrows showing water flow direction in each land drain and waterbody;
- (iv) all leachate, groundwater, gas and surface water monitoring locations; and
- (v) the brown oval feature located east of the monitoring location SW-A, as shown in Figure 4.3, and a label identifying this feature.

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. The revision status, such as revised drawing number and/or revision date should be clearly stated. Also, 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 *eight 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 historiclandfillapplications@epa.ie, quoting the Register Number H0296-01. 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.

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
Circular Economy Programme
Office of Environmental Sustainability