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4<sup>th</sup> April 2022

Reg. No. H0194-01

**Re: Ahascra 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. Lynch,

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. It is noted that no site boundary is shown for the landfill on the GIS map at <https://gis.epa.ie/EPAMaps/>. Please amend the Section 22 Register to reflect the site boundary for the closed landfill.
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. The Section 22 Register Number given in Section C.2 of the Application is S22-02664 however, Section 2.0 of the Tier 1 Assessment gives the following number S22-02656. State the correct Section 22 Register Number for the site.
4. The findings of the geophysical survey indicate that industrial waste was deposited in the landfill. State the nature of this waste. Additionally, state whether hazardous waste was deposited within the landfill. Classify any such waste in accordance with the “*EPA Waste Classification, List of Waste & Determining if Waste is Hazardous or Non-hazardous*”.

5. Section 5.1.1 of the Tier 3 Assessment states that the site is used for cattle grazing. Sections 2.2.1 and 3.1.2 of the Tier 2 Assessment indicate that parts of the site are used as an agricultural storage area and a gravel compound. State whether the site will continue to be used for the same purposes post remediation works.
6. Re-submit the Drawing No. P1766-0101-0003 of the Tier 3 Assessment to show reference labels for the six boreholes referred to as 'existing borehole to be retained & sealed for gas monitoring'. Additionally, state what monitoring was carried out at these boreholes and provide the associated monitoring results.
7. State the full date for the walkover checklist in the Tier 2 Assessment.
8. It is noted that Photo No. 5 dated 23/10/19 and Photo No. 7 dated 23/10/19 of the Photographic log for the site are different photos but are both annotated '*surface water (SW01) located north-east of old landfill. Ponded water*'. Also, Photo No. 6 and Photo 8, dated 23/10/19, are different but both are annotated '*Surface water (SW02) located south-east of old landfill. Ponded water*'. Please re-submit the photos with correct annotations.
9. It is noted that no leachate monitoring was carried out within the waste body. Accordingly, please carry out leachate monitoring using appropriate boreholes within the waste body.
10. State the reason for proposing only one passive gas vent for the site, as indicated in Drawing No. P1766-0101-0003 of the Tier 3 Assessment.
11. Section 5.1.9 of the Tier 3 Assessment refers to the 'management of leachate breakouts or condensate' using gravel soakaways or similar approved. Clarify if it is considered that the proposed landfill cap will prevent leachate breakouts or condensate. If not, clarify if a leachate collection system has been considered to manage leachate breakouts or condensate?
12. It is noted that surface water monitoring was carried out on 16<sup>th</sup> July 2019 and 3<sup>rd</sup> September 2019 at two locations SW01 and SW02 on the surface water peatland drainage channel located along the eastern site boundary, as shown in Figure 4.2 'Surface Water Sampling Locations' of the Tier 2 Assessment. Considering that groundwater beneath the site flows towards the north/ north-west, and that both monitoring locations are upstream of the waste body, it is noted that surface water monitoring carried out may not reflect the potential impact of the landfill on surface water. Accordingly, please repeat surface water monitoring at the existing locations SW01 and SW02 and at one additional location downstream of the waste body. Include the monitoring locations in the Drawing required under Point 14.
13. It is noted that the most recent groundwater monitoring was carried out on 3<sup>rd</sup> September 2019 and 16<sup>th</sup> July 2019 at two monitoring boreholes BH01 and BH02, as shown in Figure 4.1 'Groundwater Flow Direction' of the Tier 2 Assessment. Considering the direction of groundwater flow towards the north/ north-west, it is considered that the monitoring location BH01 may not be fully representative of groundwater downgradient of the waste body. Accordingly, please install an additional borehole, BH03, outside the waste body towards the west/ north-west and carry out up-to-date groundwater monitoring in BH01, BH02 and BH03. Include the monitoring locations in the Drawing required under Point 14. Additionally, include a log for the new borehole.
14. 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;
  - (iii) all leachate, groundwater, gas and surface water monitoring locations;
  - (iv) the following waterbodies:
    - (a) existing perimeter drains and the proposed surface water drainage referred to in Section 5.1.7 of the Tier 3 Assessment;
    - (b) the man-made peatland drainage channel where the surface water monitoring in 2019 was carried out;

- (c) the small low flowing stream located along the north-eastern boundary of the site referred to in the walkover checklist under Point 7; and
- (d) the adjacent river along the western boundary referred to in Section 3.4 of the Tier 3 Assessment.

Note that each land water drain, channel and waterbody should be shown in blue and be annotated. Please also include arrows showing water flow direction in each land drain and waterbody.

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](mailto:historiclandfillapplications@epa.ie), quoting the Register Number H0194-01. 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,



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Ewa Babiarczyk  
Inspector  
Environmental Licensing Programme  
Office of Environmental Sustainability