

Mr. Colin Ryder,
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Áras an Chontae,
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5th July 2022

Reg. No. H0181-01

Re: Gort 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. Ryder,

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. The location and the site boundary of the closed landfill, as shown on the GIS map at <https://gis.epa.ie/EPAMaps/>, are different to the location and the site boundary shown in Drawing No. P2282-0100-0001 'Site Location Map (Gort Historic Landfill)' of the Tier 3 Assessment. Clarify if the GIS map shows the correct location and site boundary and if not, amend the Section 22 Register to reflect the correct site location and boundary.
2. Section B.1. of the Application Form states that Galway County Council is the owner of the site. Section 3.2.1 of the Tier 3 Assessment states that the capping works shall be subject to agreement with private landowner(s). Clarify whether the site is owned by Galway County Council or private landowner(s).
3. Provide a letter from the Professional 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, using template/sample letter for Qualified Person available at <https://www.epa.ie/our-services/licensing/waste/historic-landfills/>.

4. Figure 4.1 'Groundwater flow' of the Tier 2 Assessment indicates that groundwater flows towards the north-west. Section 4.3.1 of the same document states that the groundwater flow direction is estimated to be to the north and the Figure 2.1 '*Gort Historic landfill Conceptual Site Model*' in the Tier 3 Assessment indicates that groundwater flows towards the west. Clarify the direction of groundwater flow. Include a figure showing the correct direction of groundwater flow.
5. Section 1.3 of the Tier 3 Assessment states that remediation works carried out to date included a no longer operational leachate collection system, which comprises a network of sub-surface drainage, pump control unit, leachate pump sump and rising main and that leachate was pumped from the sump to the local sewer network for treatment at the Gort wastewater treatment plant (WWTP). Provide the following information:
 - (i) State how leachate will be managed in the future and whether the existing leachate infrastructure will be utilised again. If so, please include a layout of this infrastructure on the Drawing required under Point 7.
 - (ii) If it is proposed to collect leachate, state whether leachate will be taken off site to an authorised recovery/disposal facility or will be discharged from the site again to the local sewer network. If to be discharged from the site, state whether there is authorisation in place for this discharge and submit a copy of any such authorisation.
6. Referring to the Appendix 2 '*Site Walkover Checklist and Photographic Log*' of the Tier 2 Assessment, provide the following information:
 - (i) State the nature of waste observed on the surface of the landfill, as indicated in the walkover survey checklist, i.e. litter or exposed waste. Additionally, provide the date of the related walkover.
 - (ii) Photo No. 1 and 2 refer to the Holy Well. Show the location of this well on the Drawing required under Point 7. Additionally, clarify whether the groundwater monitoring results for Samples No. 22408528 and 517824 in Appendix 2 refer to the holy well identified in the photos.
 - (iii) Photo No. 3 shows 'stone/construction and demolition waste' in an area adjacent to the landfill. Show this area on the Drawing required under Point 7 and provide a reason why this area has not been included into the site boundary.
7. Provide one Drawing showing all of the following elements interpolated:
 - (i) the entire site boundary in red;
 - (ii) the outline of the waste body boundary, in a different colour than red;
 - (iii) the area to be capped, in a different colour than required in Points (i) and (ii);
 - (iv) monitoring locations for leachate, landfill gas, surface water and groundwater;
 - (v) the leachate collection infrastructure referred to in Point 5(i), if being utilised in the future;
 - (vi) the Holy Well referred to in Point 6(ii); and
 - (vii) the 'stone/construction and demolition waste' area referred to in Point 6(iii).

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 *four 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 H0181-01. 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 Regulation Team
Circular Economy Programme