

Circular Economy Programme
Office of Environmental Sustainability,
Environmental Protection Agency Headquarters,
PO Box 3000,
Johnstown Castle Estate,
County Wexford.

12th August 2022

Ref. No. H0176-01

Re: Notification in accordance with Remediation 7(5) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008, of a draft Certification of Authorisation in respect of the application for Certificate of Authorisation for Tullyvogheen Historic Landfill at Clifden, County Galway.

Representations from Galway County Council.

A Chara,

Further to receiving notification of a draft Certificate of Authorisation for Tullyvogheen, Clifden, Co. Galway and in accordance with Regulation 7(5) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008, I hereby lodge the following representations on behalf of Galway County Council to the proposed decision.

We request that the EPA defer the determination for the requirement for a landfill cap until further monitoring is undertaken. Following a further information request by the EPA on the 29th January 2021, further analysis and a report dated 14th September was produced which concluded ;

“The results of the ammonia analysis showing an increase since 2014 are not conclusive, as it is possible that hydraulically upgradient sources of contamination from agricultural practices are impacting on groundwater entering the site (i.e. there is evidence of groundwater contamination not solely from the landfill waste). It is also possible that the low groundwater table and extended dry weather at the time of sampling were contributing factors in an increase in methanogenesis within the waste body and also an increase in the concentration of contaminants found in the groundwater and leachate.”

On this basis we feel further testing would be prudent as heretofore *“The results of the groundwater and leachate monitoring and landfill gas monitoring indicate that the site is undergoing intrinsic remediation with the groundwater chemistry and redox conditions within the waste body and saturated zone changing gradually with time. For the most part, the groundwater data indicates that the quality of groundwater is improving on site”*.

The proposed capping of the landfill will require the importation, placement and grading of approximately 12,500 cu.m of soil in a site that is extensively contaminated with gunnera and located in an ecologically sensitive area. We therefore request the EPA give consideration to our request so that the optimum remediation measures for the area can be further explored. This could be accommodated within the Certificate of Authorisation by adding '*unless otherwise agreed by the Agency*' after condition 3.1(b).

Notwithstanding our primary request and at the risk of forfeiting our opportunity to comment in this consultation process, but not to diminish our primary representation, we make the following observations in respect to the license conditions ;

Condition 2.4 : The local authority have heretofore being fully reliant on department funding to progress the historic landfill licensing process and will continue to depend on this support to implement the requirements of the proposed license. This dependency must be recognized in the setting of expectations and timeframes within the license.

Condition 3.1 : There are many uncertainties within the implementation process beyond the control of the licensee which warrant a review of the proposed timeframe for instance ; CPO (Tullyvogheen site is commonage), planning process, funding approval, procurement. We suggest a two-stage time related approach, firstly with regard to the lodgement of a planning application and secondly the implementation of the approved planning within a subsequent timeframe.

Condition 3.1c : At the risk of causing damage to the gas management infrastructure during the proposed subsequent earthworks, it is our opinion that capping and gas management works should be undertaken simultaneously. A 6-month timeframe is also unachievable for reasons made in 3.1 above.

Condition 3.1e : It may not be possible to get permission to install two groundwater monitoring boreholes outside the landfill boundary.

Condition 3.2 : The Site Notice Board should be erected when planning and funding are approved for the remediation works which is a primary objective of the CoA. Until the risks of site acquisition, planning process, funding and procurement are resolved there can be no certainty on delivery. A site planning notice will serve to inform the public of the proposed site remediation works but unlike a planning notice which informs that permission is being sought, a CoA notice board may incorrectly convey permissions have been granted.

Condition 3.4 : Access to private wells cannot be guaranteed. Parameters for monitoring have not been defined.

Condition 3.8 : See Condition 3.1 comments.

Condition 3.9 (f) : Please explain requirement for screening for trace organics when recent monitoring results for BH 1,2 &3 indicated trace organics less than limit & these BHs were in the waste body.

Condition 3.10 : requires monthly review of gas management system and Part III A.2 requires quarterly monitoring. As the number of historic landfill licenses increase within the county these inspection frequencies will strain our resources. A review of the gas

management system quarterly in line with monitoring would be more practical. The site is not open to the public and there are no grazing animals on site.

Condition 3.13.1 : As availability of approx. 12,500 cu.m of soil of equivalent nature and character in terms of chemical and physical contamination may be difficult to acquire please consider a 500mm cap per afteruse category “low maintenance/use amenity sward”, ref. Table 4.3 of the EPA Landfill Restoration & Aftercare Manual.

Condition 3.21.2 : Is this condition appropriate for a historic landfill which has been closed for over 25 years. Nearest domestic dwelling is 400m south west.

Condition 3.21.3 : Duplication as Condition 2.3 adequately addresses these requirements.

Schedule A: Monitoring (A1, A3 & A4):

Is it necessary to monitor for;

- PAHs, as samples well below the Minimum Reporting Values stated in Table D2 of EPA Landfill Monitoring Manual 2003.
- BOD & COD in groundwater samples, as not listed in Table C.2 of EPA Landfill Monitoring Manual 2003

Please clarify what is meant by “other relevant heavy metals”

Mise, le meas,

Colin Ryder

Colin Ryder,

Galway County Council.



Comhairle Chontae na Gaillimhe
Galway County Council