



COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

Ms. Ewa Babiarczyk.

Inspector,

Circular Economy Regulation Team,

Office of Environmental Sustainability.

Reg No. H0035-01

Date: 7-12-2022

Re: Whitegate Landfill – Response to Notice in accordance with Regulation 7(4) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations, 2008.

Dear Ewa,

In response to your Regulation 7(4) request received by Clare County Council dated 9th Aug 2022, please note my responses below. I have addressed each one individually and numbered to correspond with your further information request.

I have also attached the following:

Non-Technical Summary

Drawing 1: Extent of Landfill Body at Whitegate historic landfill; Dec 2022 Rev 1.

Drawing 2: Location of trial pits Rev 1

Drawing 3: Revised Conceptual Site Model drawing Rev 1 (showing N-S and E-W cross sections)

Item 1 – Clarification of extent of waste body.

The Council can confirm that the extent of the waste body is contained within an area of 1.19Ha, as defined in a new Drawing 1: Extent of Landfill Body at Whitegate historic landfill; Dec 2022 Rev 1.

For clarity, the area outlined in red is the fence line of council owned property. The fenced area is circa 1.3 hectares.

An Roinn Chomhshaoil
An Stiúirthóireacht Forbairt Fhisiceach

Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

Environment Department
Physical Development Directorate

Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2

The area as outlined in black measures 1.19Ha and denotes the extent of the waste body.

For clarity, the previous references to 8Ha in various reports and correspondence, refers to a larger Council owned landholding in the townland of Whitegate.

Item 2 – Composition of trial pit (TP6).

In response to the EPA's query within correspondence dated 9th August 2022, regarding the composition of the Trial Pit 6, staff from the Environment Section, Clare County Council did carry out further investigation of this area.

Based upon the findings of this inspection, the Council can confirm that there is no evidence of waste material as defined under the Waste Management Act 1996, as amended at the location of Trial Pit 6 or the surrounding area.

Based on review of the original trial pit logs, together with a recent inspection of the area in question by Council staff, it is evident that soils comprising of glacial tills, cobbles and boulders are present at the eastern boundary of the landfill body. There is no evidence of 'rubble' or other construction and demolition wastes present in or around the location of Trial Pit 6.

Furthermore, please see Photo 01, which demonstrates the composition of the original Trial Pit 6. This photo demonstrates the presence of soil, cobble and boulders, typically of glacial tills, with no evidence of construction and demolition waste.

Photo 01



Based upon the above referenced investigation and original trial pit logs, this area does not contain waste, and the Council is of the opinion that this area should not be considered within the landfill body. The extent of the landfill body remains 1.19Ha as previously stated.

Item 3: Depth of waste within landfill body.

Clare County Council did conduct a trial pitting exercise in November 2009, which informed the Tier 2 report at that time. Trial holes were excavated at approximately 50m intervals across this site, as demonstrated in Drawing 2: Location of trial pits.

As described in previous correspondence to the EPA, the landfill body comprises of waste that was deposited above ground level, commencing at the western boundary adjoining the public roadway, and extending in an eastern direction for a distance of approximately 200m.

The waste body followed the contours of the existing land levels, as detailed in previous reports, with no evidence to suggest that waste is deposited below ground level. This is confirmed by the trial pit logs.

This waste body effectively creates a ridge on the landscape travelling west to east and is bounded by a surface water course along the northern boundary, and a fence line on the southern boundary.

The top of this ridge is a relatively level plateau, with slopes extending and falling to natural ground levels along the northern, eastern and southern boundaries. (Refer to Drawing 3 Revised Conceptual Site Model Rev 1)

During the trial pitting exercise as undertaken in November 2009, trial pits were excavated at several locations at the top of this plateau. Each of those trial pits identified between 4.5m to 4.8m of waste present, above a natural peat soil layer. While it is acknowledged that these trial pits were not excavated at the centre of the landfill body, it is the determination of Clare County Council that the depth of waste encountered is representative of the maximum depth of waste on site. (Refer to Drawing 3 Revised Conceptual Site Model Rev 1)

There is no evidence gathered from site investigations to suggest that waste was deposited below the natural ground level of this site.

Item 4: Conceptual Site Model.

Please note Drawing 3 Revised Conceptual Site Model Rev 1 as requested.

Item 5: Slope direction.

Please note Drawing 3 Revised Conceptual Site Model Rev 1 as requested.

Clare County Council wishes to take this opportunity to extend an invitation to the EPA to arrange for a site inspection of the Whitegate landfill combined with a post site visit meeting in Áras Contae an Chláir should the EPA deem it beneficial. The purpose of this inspection would be to assist EPA staff in assessing the current application and provide an opportunity for the EPA to engage with Council staff to provide clarification or other supporting information that may assist the EPA in reaching a determination on the application.

Brendan Flynn

Brendan Flynn

Senior Executive Engineer

Physical Development Directorate (Environment)

Clare County Council