

Eve O'Sullivan

From: historiclandfill applications
Subject: Ahascra Historic Landfill H0194
Attachments: Draft Ahascra CoA.pdf; CoA Representations Ahascra Nov2023.pdf

From: Colm Lynch <clynch@kerrycoco.ie>
Sent: Tuesday 21 November 2023 16:21
To: historiclandfill applications <historiclandfillapplications@epa.ie>
Subject: RE: Ahascra Historic Landfill H0194

Dear Sir/Madam,

I refer to the Draft Certificate of Authorisation (copy attached) in respect of Ahascra Historic Landfill (H0194) which was issued on 24th October 2023. Kerry County Council (KCC) wishes to make the representations to the proposed Draft CoA – refer attached document.

Please acknowledge receipt of email.

Colm Lynch
Executive Engineer
Kerry County Council

**Environmental Protection Agency
Headquarters, PO Box 3000
Johnstown Castle Estate
Co. Wexford
Y35 W821
Ireland**

21st November 2023

Re: Representations in relation to Draft Certificate of Authorisation for Ahascra H0194

Dear Sir/Madam,

I refer to the Draft Certificate of Authorisation in respect of Ahascra Historic Landfill (H0194) which was issued on 24th October 2023.

Kerry County Council (KCC) wishes to make the representations to the proposed Draft CoA. Prior to the issuing of a final decision, KCC would welcome an opportunity to discuss the proposed conditions with the Agency.

The following are comments and requests for clarification:

Part 1: Address should be amended to: "Maine Street, Tralee".

Condition 2.5: Does KCC commence payment of the €1,083 annual charge from the date of grant of the Certificate of Authorisation?

Condition 3.1: It is considered highly unlikely that KCC will be in a position to implement the measures within 24 months of grant of Certificate of Authorisation; boreholes have to be modified to accommodate gas monitoring; gas monitoring has to be undertaken; agreement with EPA is required in relation to gas management; An Bord Pleanála application must be prepared and submitted; approval from An Bord Pleanála must be received prior to procuring a contractor. KCC suggests that a 48-month time period would be more appropriate.

Condition 3.1 (c): Clarification is required in relation to required duration of gas monitoring; Condition 3.1 (e) indicates that agreement on gas pumping trail is to be submitted within 12 months. A gas risk assessment will be based on Tier 3 modelling, which shows landfill gas production as of 2023 is theoretically estimated to be less than 23 m³/hour. There is elevated leachate on this site and leachate breakouts were clearly visible during the site walkover. Gas monitoring, if carried out under prevailing site conditions, is unlikely to reflect future gas production. Future gas production may increase once rainfall inputs are isolated and the elevated leachate as may be present, drains over time (following secondary consolidation and waste breakdown). Future monitoring as defined in A2 requires quarterly monitoring. This should be carried out for a period of at least 2 years and reviewed

thereafter with regard to frequency. KCC suggests that A2 should be modified to state “quarterly, unless otherwise agreed by the Agency”.

Condition 3.1 (d): KCC considers that the requirements of this condition are adequately covered in 3(1)(c).

The wording of the condition enforces an obligation to install a type of landfill gas management in the absence of a landfill gas risk assessment, per Condition 3.1 (c), or pumping trial, per Condition 3.1 (e).

Condition 3.1 (j): Clarification is sought on the type of assessment of the need for a leachate management system; Should this assessment be done before or after remediation? Capping of the landfill will reduce leachate generation at this unlined landfill.

Condition 3.4: Clarification is sought on what is meant by “appropriate monitoring”? Schedule A.4 does not reference the down-gradient wells.

If no impact is found, do the down-gradient wells need to be continually monitored on a biannual basis?

KCC suggests that “unless otherwise agreed with the Agency” should be included in this condition.

Condition 3.5: It is considered highly unlikely that KCC will be in a position to compile a validation report within 30 months of grant of Certificate of Authorisation for reasons outlined earlier above.

KCC suggests to amend “30-months” to “within 6 months of completion of the remediation works”.

Condition 3.8: It is considered that “unless otherwise agreed” should be added to “within 30 months of the date of grant” as KCC considers the 30-months timeframe is too short. It is suggested that the timeframe should be “within 6 months of completion of the remediation works”.

Condition 3.9: KCC suggests the that “The Local Authority shall conduct, record...” be changed to “Unless otherwise agreed with the Agency, the local authority shall conduct, record”

Condition 3.9 c (i): The trigger levels shown are for “outside the waste body” which is applicable to BH 1 & BH 2.

Cond. 3.1 (d) (ii) requires gas monitoring in 6 BHs within the waste body (OLD-BH-1 – OLD BH-6). The EPA decision tree states TRIGGER LEVEL OF >30% CH₄ CONCENTRATION (EPA/GOLDER 2011 - INSIDE WASTEBODY). Please clarify.

Condition 3.9 (f): Does the screening of groundwater for trace organic substances relate to just BH01, BH02 and BH03? It is suggested that screening should be “in perimeter boreholes, unless otherwise agreed by the Agency”.

Trace organic substances are not indicated in Schedule A.4 Groundwater

Monitoring of this COA. Is Schedule A.4 to be included in annual monitoring requirements?

Condition 3.10: As quarterly monitoring is to be undertaken per Appendix A.2, clarification is required in relation to what the monthly review of the gas management system involves and what the site water drainage system involves? Is it a visual inspection?

Condition 3.11: What is meant by “adjacent” in relation to “dwellings adjacent to the landfill”? Is it necessary to carry out external monitoring?

Condition 3.18: As the site is not staffed and attendance at this site will only be to conduct monitoring and inspections in accordance with this CoA, the following wording is proposed: “In the event of an incident being identified by the local authority it shall immediately: . . .”

Condition 3.19.2: As the remediation measures proposed remove the risks identified, there will be no measures required to be taken by the public.

Schedule A1: Does Phosphorus refer to Total Phosphorus? What specific heavy metals are referred to in “Relevant Heavy Metals”?

Schedule A3: What specific heavy metals are referred to in “Relevant Heavy Metals”? Why is there a need to measure Coliforms? They are not listed as a required parameter in Table C2 of the Landfill Monitoring Manual.

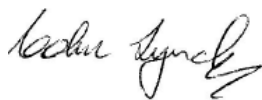
Schedule A4: Why is there a need to measure BOD? BOD is not listed as a required parameter in Table C2 of the Landfill Monitoring Manual.

Does Phosphorus refer to Total Phosphorus?

What specific heavy metals are referred to in “Relevant Heavy Metals”?

Does “Coliform bacteria” refer to Total and Faecal coliforms?

Yours faithfully,



Colm Lynch

Environmental Services

Kerry County Council

Maine Street,

Tralee

Co. Kerry

V92 AP2W

Headquarters
P.O. Box 3000
Johnstown Castle Estate
County Wexford
Ireland

Closed Landfill Draft Certificate of Authorisation

Certificate of Authorisation Number:	H0194-01
Certification of Authorisation Holder:	Kerry County Council
Name of Facility:	Ahascra Historic Landfill
Location of Facility:	Lisselton County Kerry



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WASTE MANAGEMENT (CERTIFICATION OF HISTORIC UNLICENCED WASTE DISPOSAL AND RECOVERY ACTIVITY) REGULATIONS 2008

HISTORIC LANDFILL

DRAFT CERTIFICATE OF AUTHORISATION

Proposed Decision of Agency, under Regulation 7(5) of the Waste Management
(Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations
2008

Reference Number: H0194-01

In pursuance of the powers conferred on it by the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008, the Environmental Protection Agency (the Agency) proposes, under Regulation 7(5) of the said Regulations, to grant this draft Certificate of Authorisation to Kerry County Council, Main Street, Tralee, County Kerry, in respect of the closed landfill at Ahascra, Lisselton County Kerry, subject to conditions set out in the proposed Certificate of Authorisation.

REPRESENTATIONS

The Local Authority may make representations to the proposed decision, in accordance with Regulation 7(5) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008 at any time no later than 5.00pm on **22 November 2023**. It is important to note that any representations to a proposed decision must be received by the Agency before the appropriate period expires.

A representation must be made by sending the representation by prepaid post to the Agency, or by leaving the representation with an employee of the Agency at the principal offices of the Agency in Wexford during office hours, i.e. 9.00am to 5.00pm Monday to Friday.



A representation against the proposed decision must state in full the grounds of the representation. For the purposes of making a representation, the address of the principal office of the Agency is P.O. Box 3000, Johnstown Castle Estate, County Wexford.

In the event that;

- (a) no representation is taken against the proposed decision or
- (b) a representation taken against the proposed decision is withdrawn,

the decision of the Agency will be in accordance with the proposed decision and will be issued as soon as may be after the appropriate period expires.

A copy of the Proposed Decision is attached.

**Signed on behalf of the Agency:
On the 24th day of October, 2023**



Ray Cullinane, Authorised Person

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Glossary of Terms

All terms in this Certificate of Authorisation should be interpreted in accordance with the definitions in the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008 (S.I. No. 524 of 2008) unless otherwise defined in the Certificate of Authorisation.

Agency	Environmental Protection Agency.
Agreement	Agreement in writing.
Annually	At approximately twelve-monthly intervals.
Application	The application by the local authority for this Certificate of Authorisation including the risk assessment, any amendments to the risk assessment, additional information received from the local authority and other documents provided by the local authority.
Certificate of Authorisation	Includes this document and the application.
Closed Landfill	As defined in the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008.
Code of Practice	As defined in the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008.
Biannually	All or part of a period of six consecutive months.
Documentation	Any report, record, results, data, drawing, proposal, interpretation or other document in written or electronic form which is required by this Certificate of Authorisation.
Drawing	Any reference to a drawing or drawing number means a drawing or drawing number contained in the application, unless otherwise specified in this Certificate of Authorisation.
Environmental Pollution	As defined in the Waste Management Act 1996 as amended.
Greenfield soil and stone	Soil and stone from land that has not been previously developed and is not contaminated soil and stone.
Heavy Metals	This term is to be interpreted as set out in "Parameters of Water Quality, Interpretation and Standards" published by the Agency in 2001. ISBN 1-84095-015-3.

Incident	<p>The following shall constitute an incident for the purposes of this Certificate of Authorisation:</p> <ul style="list-style-type: none">(i) an emergency;(ii) any emission which does not comply with the requirements of this Certificate of Authorisation;(iii) malfunction or breakdown of key environmental abatement, control or monitoring equipment;(iv) any trigger level specified in this Certificate of Authorisation which is attained or exceeded; excluding landfill as within the waste body; and(v) any indication that environmental pollution has, or may have, taken place.
Inert Waste	<p>Waste that does not undergo any significant physical, chemical or biological transformations. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular not endanger the quality of surface water and/or groundwater.</p>
Maintain	<p>Keep in a fit state, including such regular inspection, servicing, calibration and repair as may be necessary to perform its function adequately.</p>
Necessary Measures	<p>As defined in the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008.</p>
Relevant Heavy Metals	<p>Heavy metals for analysis shall include, as a minimum, those metals identified as relevant, having regard to the risk assessment and surface water and groundwater monitoring results as required by this Certificate of Authorisation.</p>
Risk Assessment	<p>As defined in the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008.</p>
Sample	<p>Unless the context of this document indicates to the contrary, the term sample or samples shall include measurements taken by electronic instruments.</p>
Status	<p>As defined in the Water Framework Directive, in relation to surface water and groundwater.</p>
The Local Authority	<p>Kerry County Council, Main Street, Tralee, County Kerry.</p>
Trigger Level	<p>A parameter value, the achievement or exceedance of which requires certain actions to be taken by the local authority.</p>

Reasons for the Decision

In proposing to grant this Certificate of Authorisation, the Agency determines that the risk assessment submitted by the local authority as part of the application for a Certificate of Authorisation is adequate. To ensure appropriate protection for human health and the environment and to ensure conformity with the provisions of Council Directive 2008/98/EC and Council Directive 2006/118/EC, the conditions set out in Part II of this Certificate of Authorisation are specified as further necessary measures in addition to those identified by the risk assessment.

The Agency also considers that the activity will not adversely affect the integrity of any European Site and has decided to impose conditions for the purposes of ensuring it does not do so. It has determined that the activity, if managed, operated and controlled in accordance with the Certificate of Authorisation, will not have any adverse effect on the integrity of any of those sites.

The Agency accordingly proposes to grant a certificate of authorisation to Kerry County Council to carry out the activity, at Ahascra Historic Landfill subject to the Conditions set out in *Part II, Conditions*.

In reaching this decision the Agency has considered the documentation relating to: the certificate of authorisation application, Register Number: H0194-01 and the supporting documentation received from the applicant; the Inspector's Report dated 16 October 2023; and has carried out an Appropriate Assessment of the likely significant effects of the necessary measures, including remediation measures, on European Sites. The Agency has performed its functions in a manner consistent with Section 15 of the Climate Action and Low Carbon Development Act 2015 as amended.

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activity, individually or in combination with other plans or projects is likely to have a significant effect on any European Site. In this context, particular attention was paid to the European Sites at Lower River Shannon SAC (Site code: 002165), Kerry Head SPA (Site code: 004189), River Shannon and River Fergus Estuaries SPA (Site code: 004077), Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (Site code: 004161) and Moanveanlagh Bog SAC (Site code: 002351).

The activity is not directly connected with or necessary to the management of any European Site and the Agency considered, for the reasons set out below, that it cannot be excluded, on the basis of objective information, that the activity, individually or in combination with other plans or projects, will have a significant effect on any European Site and accordingly determined that an Appropriate Assessment of the activity was required. A Natura Impact Statement was not requested as it was considered that there was sufficient information available to allow Appropriate Assessment to be carried out.

The reasons for the determination that an Appropriate Assessment was required are as follows:

- There is a hydrological connection between the closed landfill and the Lower River Shannon SAC (Site code: 002165) via the site perimeter drains which discharge, via a network of drainage channels, into the Feale river (river segment code: 23_2056) (assigned also as the Cashen transitional waterbody (transitional waterbody code: IE_SH_060_0100)). The Feale river /Cashen transitional waterbody are designated as part of the Lower River Shannon SAC (Site code: 002165).
- There is a hydrological connection between the closed landfill and the Kerry Head SPA (Site code: 004189) and the River Shannon and River Fergus Estuaries SPA (Site code: 004077) via the site perimeter drains which discharge, via a network of drainage channels, into the Feale river (river segment code: 23_2056) /Cashen transitional waterbody (transitional waterbody code: IE_SH_060_0100), which in turn discharge into the Coastal Waters (European code: IE_SH_060_0000). Parts of the Coastal Waters (IE_SH_060_0000) are designated as the Kerry Head SPA (Site code: 004189) and the River Shannon and River Fergus Estuaries SPA (Site code: 004077).
- There is no hydrological connection between the closed landfill and the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (Site code: 004161) or Moanveanlagh Bog SAC (Site code: 002351).

The Agency has completed the Appropriate Assessment of potential impacts on these sites and has made certain, based on best scientific knowledge in the field and in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011 as amended, pursuant to Article 6(3) of the Habitats Directive, that the activity, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site, in particular Lower River Shannon SAC (Site code: 002165), Kerry Head SPA (Site code: 004189), River Shannon and River Fergus Estuaries SPA (Site code: 004077), Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (Site code: 004161) and Moanveanlagh Bog SAC (Site code: 002351), having regard to their conservation objectives and will not affect the preservation of these sites at favourable conservation status if carried out in accordance with this Certificate of Authorisation and the conditions attached hereto for the following reasons:

- specifically, the remedial works will be undertaken to minimise the potential for water pollution in the Lower River Shannon SAC (Site code: 002165), Kerry Head SPA (Site code: 004189) and River Shannon and River Fergus Estuaries SPA (Site code: 004077) and will ensure that there will be no significant impact on these European Sites;
- the project alone, which consists of the remediation of the closed landfill, or in combination with other projects, will not adversely affect the integrity and conservation status of any of the qualifying interests of the Lower River Shannon SAC (Site code: 002165), Kerry Head SPA (Site code: 004189) and River Shannon and River Fergus Estuaries SPA (Site code: 004077); and
- There is no hydrological connection between the closed landfill and the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (Site code: 004161) or Moanveanlagh Bog SAC (Site code: 002351).

The Agency is satisfied that no reasonable scientific doubt remains as to the absence of adverse effects on the integrity of these European Sites: Lower River Shannon SAC (Site code: 002165), Kerry Head SPA (Site code: 004189), River Shannon and River Fergus Estuaries SPA (Site code: 004077), Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (Site code: 004161) and Moanveanlagh Bog SAC (Site code: 002351).

Part I Authorisation of a Closed Landfill

The Environmental Protection Agency (the Agency) proposes to grant, under Regulation 7(5) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008 (the Regulations), this Certificate of Authorisation to Kerry County Council, Main Street, Tralee, County Kerry, in respect of the closed landfill at Ahascra Historic Landfill, Lisselton, County Kerry, subject to Conditions set out in Part II and Schedule set out in Part III of this Certificate of Authorisation.

Part II Conditions

Condition 1. Scope

- 1.1 For the purposes of this Certificate of Authorisation, the closed landfill authorised by this Certificate of Authorisation is the area of land outlined in red on Figure No. 2.1: 'Site Location' (Figure date: 29/10/2019) submitted with the application. Any reference in this Certificate of Authorisation to "closed landfill" shall mean the area thus outlined in red. Activities associated with the closed landfill shall be carried on only within the area outlined.
- 1.2 No waste shall be accepted at the closed landfill.
- 1.3 No waste shall be burned at the closed landfill.
- 1.4 The facility shall be controlled, operated and maintained, and emissions shall take place as authorised by this Certificate of Authorisation. No material change that will result in an increase in the actual or potential nature or quantity of any emission shall be carried out or commenced without the agreement of the Agency.
- 1.5 Nothing in this Certificate of Authorisation shall prohibit authorised beneficial uses of the site of the closed landfill provided that such uses do not interfere with the integrity of the remediation measures adopted.
- 1.6 The Risk Assessment for the site shall be re-evaluated and provided to the Agency in the event of future developments or changes in land use at the site, if required by the Agency.

Reason: <i>To clarify the scope of this Certificate of Authorisation.</i>
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Condition 2. Notifications, Records and Reports

- 2.1 The local authority shall notify the Agency, in a format as may be specified by the Agency, 2 months in advance of the intended date of commencement of the remediation works.
- 2.2 The local authority shall notify the Agency as soon as practicable after the occurrence of any incident. The incident notification shall be provided in a format as may be specified in relevant guidance issued by the Agency.
- 2.3 The local authority shall keep the following documents available for inspection by the Agency at all reasonable times and to members of the public by request:
- (a) Records of all sampling, analyses, measurements, examinations, calibrations and maintenance;
 - (b) Records of incidents;
 - (c) Records of all complaints of an environmental nature;
 - (d) The validation report prepared on completion of the remediation; and
 - (e) Other documentation required by this Certificate of Authorisation or as may be otherwise directed by the Agency.
- 2.4 The local authority shall assign the necessary resources, including financial, to complete the remediation measures specified in this Certificate of Authorisation and risk assessment and to respond to any incident.
- 2.5 The local authority shall annually pay to the Agency €1,083, or such sum as the Agency from time to time determines in accordance with charges policy, for the performance of its functions under the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008 in relation to the closed landfill regulated by this Certificate of Authorisation.

Reason: *To provide for the collection and reporting of adequate information on the activity. To provide for adequate resources for monitoring and measures to protect the environment.*

Condition 3. Management and Monitoring

3.1 The local authority shall implement, unless otherwise agreed by the Agency, the following measures within 24 months of the date of grant of this Certificate of Authorisation, or as otherwise agreed by the Agency:

- (a) Minimise the disturbance of deposited waste to the extent possible;
- (b) Install a low permeability landfill cap over the entire waste body, minimum 1m with 1mm thick low permeability geomembrane, or equivalent, to achieve a hydraulic conductivity of less than or equal to $1 \times 10^{-9} \text{m/s}$;

The landfill cap shall incorporate the following elements installed in accordance with the EPA Landfill Manuals – Landfill Site Design and its design shall be submitted to the Agency for approval prior to installation:

- (i) Gas drainage layer;
 - (ii) Water drainage layer. Uncontaminated surface water drained from the water drainage layer shall discharge to the proposed site water drainage system, as per Drawing No. P1766-0101-0003 from the application correspondence dated December 2022; and
 - (iii) Reprofiled gradients to provide for rainwater run-off from the surface of the landfill.
- (c) Carry out a gas risk assessment to inform the final design of the gas management system at the facility. The final design shall be in accordance with the EPA Landfill Manuals – Landfill Site Design, and shall be submitted to the Agency for approval prior to implementation.
 - (d) Install, operate and maintain a gas management system at the facility.

The design of the gas management system (layout, depth, sealing etc.) shall be in accordance with the EPA Landfill Manuals – Landfill Site Design.

The gas management system shall include the following elements:

- (i) Vertical gas vent pipe(s) within the waste body, as appropriate.
 - The proposed gas vent, shall be installed as per Drawing No. P1766-0101-0003 from the application correspondence dated December 2022;
 - The gas vent pipe(s) shall not be perforated above ground level; and
 - The spacing between the gas vent pipes shall be sufficient to achieve adequate gas venting.
- (ii) The existing six boreholes BH-OLD-01 to BH-OLD-06, as per Drawing No. P1766-0101-0003 from the application correspondence dated December 2022, shall be modified to accommodate gas monitoring.
- (iii) Biological filter, if approved by the Agency.
- (iv) Any infrastructure as may be recommended by the findings of the gas risk assessment, as per Condition 3.1(c).

- (e) The local authority shall, within 12 months of the date of grant of this Certificate of Authorisation, following gas monitoring, as required under Condition 3.9(c) seek agreement of the Agency regarding whether to carry out a gas pumping trial for the purpose of determining the quantity and quality of landfill gas;
- (f) On approval by the Agency, the gas management system and associated infrastructure may be removed or altered in accordance with any recommendations arising from the gas pumping trial in accordance with Condition 3.1(e).
- (g) Install a vertical LLDPE cut-off barrier, between the waste body and the adjacent drainage channels, as per Drawing No. P1766-0101-0003 from the application correspondence dated December 2022, unless otherwise approved by the Agency. The barrier shall be installed to the maximum depth of the deposited waste and shall be incorporated into the landfill cap.
- (h) Construct the proposed site water drainage system as per Drawing No. P1766-0101-0003 from the application correspondence dated December 2022, or as otherwise approved by the Agency.
- (i) The local authority shall assess the need to install a leachate management system to remove or otherwise manage leachate from the landfill. The assessment shall be submitted to the Agency for approval and repeated at the request of the Agency, as required.
- (j) Install, operate and maintain a leachate management system, if required following the assessment as per Condition 3.1(i).
- (k) Reseed grass within the site.

3.2 Site Notice Board

- (a) The local authority shall, within one month of the date of grant of this Certificate of Authorisation and for the duration of the remediation works, provide a Site Notice Board on the closed landfill site so that it is legible to persons outside the main entrance to the closed landfill site. The minimum dimensions of the board shall be 1200 mm by 750 mm.
- (b) The board shall clearly show:
 - (i) The name of the Certificate of Authorisation holder;
 - (ii) The name of the closed landfill site;
 - (iii) The Certificate of Authorisation reference number;
 - (iv) The contact telephone in relation to the closed landfill site; and
 - (v) Where information relating to the closed landfill site can be obtained.

3.3 The local authority shall manage the closed landfill and the remedial works to ensure that discharges and emissions from the closed landfill do not cause environmental pollution or deterioration in the status of the receiving surface water body or groundwater body.

3.4 The local authority shall carry out appropriate monitoring on a biannual basis to identify any impact on the quality of water abstracted at wells downgradient of the landfill. Monitoring results shall be assessed against drinking water standards.

- 3.5 The local authority shall compile a validation report in accordance with the requirements of the Code of Practice. Unless otherwise agreed, the validation report shall be submitted to the Agency within 30 months of the date of grant of this Certificate of Authorisation. Additional measures shall be implemented, as approved by the Agency, in the event remediation has not been successful.
- 3.6 The local authority shall assess the results of all monitoring carried out to confirm whether the closed landfill continues to achieve the objectives set for it in the risk assessment or this Certificate of Authorisation. Where objectives are not achieved, additional remediation measures shall be implemented, as approved by the Agency.
- 3.7 The local authority shall submit to the Agency, by the 31st March of each year, an annual update covering the previous calendar year. This update, which shall be to the satisfaction of the Agency, shall include as a minimum the information specified in Condition 3.9 and *Schedule A: Monitoring*, of this Certificate of Authorisation.
- 3.8 The local authority shall, within 30 months of the date of grant of this Certificate of Authorisation, submit a drawing showing the following elements interpolated:
- (a) Site boundary;
 - (b) Extent of the waste body and the area capped, as required under Condition 3.1(b);
 - (c) The locations of the gas management system infrastructure, as approved under Condition 3.1(d) and Condition 3.1(f);
 - (d) The site water drainage system, including the outlet for this system, as required under Condition 3.1(h);
 - (e) All monitoring points for landfill gas, groundwater, surface water and, if required, leachate; and
 - (f) Adjacent surface water drainage channels. The drainage channels should be shown in blue and include arrows showing water flow direction.
- 3.9 The local authority shall conduct, record and assess:
- (a) A visual inspection of the landfill, on an annual basis, to ensure that the condition of the site has not deteriorated;
 - (b) Monitoring (sample, analyse, and characterise) of leachate as required in *Schedule A.1 Leachate Monitoring*, of this Certificate of Authorisation.
 - (c) Monitoring of landfill gas as required in *Schedule A.2 Landfill Gas Monitoring*, of this Certificate of Authorisation.
 - (i) Landfill gas monitoring results shall be assessed and reported against the following:
 - The trigger levels, for landfill gas measured at the monitoring wells, as set out in the EPA Landfill Manuals – Landfill Monitoring and any subsequent amendments:
 - Methane, greater than or equal to 1.0% v/v; and
 - Carbon dioxide, greater than or equal to 1.5% v/v.

- (d) Monitoring (sample, analyse and characterise) of surface water as required in *Schedule A.3 Surface Water Monitoring*, of this Certificate of Authorisation.
 - (e) Monitoring (sample, analyse and characterise) of groundwater as required in *Schedule A.4 Groundwater Monitoring*, of this Certificate of Authorisation.
 - (f) Screening of groundwater for trace organic substances, on an annual basis, in accordance with the EPA Landfill Manuals – Monitoring and any subsequent amendments.
 - (g) The sensitivity of the monitoring methods utilised for monitoring under Condition 3.9 and *Schedule A: Monitoring*, of this Certificate of Authorisation shall have an appropriate limit of detection to allow for comparison of pollutant concentrations against the relevant trigger levels as set out in Condition 3.9, standard reference values and parametric values. The analysis shall be carried out in an appropriately accredited laboratory.
 - (h) The assessment and reporting of monitoring results for leachate, surface water and groundwater against standard reference values and parametric values for relevant pollutants, including environmental quality standards in the European Communities Environmental Objectives (Surface Waters) Regulations 2009, as amended, European Communities Environmental Objectives (Groundwater) Regulations 2010, as amended, EPA Interim Guideline Values (IGV) and European Union (Drinking Water) Regulations 2014, as amended.
- 3.10 Unless otherwise agreed by the Agency, the local authority shall carry out a monthly review of the gas management system and the site water drainage system, and record details of any problems and the corrective/preventative actions taken.
- 3.11 The local authority shall, on a quarterly basis, beginning immediately after the installation of the landfill cap required under Condition 3.1(b) and the gas management system required under Condition 3.1(d), for a period of one year and thereafter if required by the Agency, complete indoor and outdoor air monitoring for Methane and Carbon Dioxide in all relevant buildings including domestic dwellings adjacent to the landfill, subject to owner's permission. The assessment of the monitoring results shall identify the impact, if any, from the migration of gas. The local authority shall submit a report on the monitoring undertaken for the period of one year to the Agency with recommendations, within three months of completion of this monitoring.
- 3.12 The location, frequency, timeframes, methods and scope of monitoring, Visual inspections, sampling and analyses, and reporting requirements as set out in this Certificate of Authorisation, may be amended with the agreement of the Agency following evaluation of test results and/or relevant proposals.

3.13 Soil and stone

3.13.1 Soil and stone imported for use in remedial, corrective or other engineering works at the closed landfill shall be greenfield soil and stone or soil and stone of equivalent nature and character in terms of chemical and physical composition.

3.13.2 Documented acceptance, storage/stockpiling and utilisation procedures shall be operational in advance of receipt of such materials. Records shall be maintained showing the site of origin of the soil and stone and its nature.

3.14 No emissions arising from activities carried on at the site, including landfill gas, leachate, odour, noise, dust, litter, mud, vermin and birds, shall result in an impairment of, or an interference with amenities or the environment beyond the facility boundary or any other legitimate uses of the environment beyond the facility boundary.

3.15 The local authority shall ensure, at all times after the grant of this Certificate of Authorisation, that all infrastructure and all equipment required under this Certificate of Authorisation has been and is:

- (i) installed;
- (ii) commissioned;
- (iii) present on site;
- (iv) functioning at all times (except during maintenance and calibration); and
- (v) calibrated and maintained in full working order.

In the event of the malfunction of any abatement equipment, the local authority shall notify the Agency as soon as practicable, and alternative abatement and monitoring facilities shall be put in place. The use of alternative equipment, other than in emergency situations, shall be as approved by the Agency.

3.16 Wells and boreholes

3.16.1 Groundwater monitoring wells and boreholes shall be constructed having regard to the guidance given in the EPA landfill manuals - Landfill Monitoring and any subsequent amendments.

3.16.2 All wellheads shall be adequately protected to prevent contamination or physical damage.

3.16.3 All wells and boreholes shall be adequately sealed to prevent surface contamination and, as may be appropriate, decommissioned according to the UK Environment Agency guidelines "Decommissioning Redundant Boreholes and Wells", unless otherwise approved by the Agency.

3.17 The local authority shall clearly label and provide safe and permanent access to all on-site sampling and monitoring points and to off-site points as required by the risk assessment or this Certificate of Authorisation. The requirement with regard to off-site points is subject to the prior agreement of the landowners concerned.

3.18 Incidents

In the event of an incident the local authority shall immediately:

- (a) If necessary, contact the emergency services;
- (b) Carry out an investigation to identify the nature, source and cause of the incident and any emission arising therefrom;
- (c) Isolate the source of any such emission;
- (d) Evaluate the environmental pollution, if any, caused by the incident;
- (e) Identify and execute measures to minimise the emissions/malfunction and the effects thereof;
- (f) Restore compliance in the shortest possible time and carry out any preventative actions to prevent recurrence of the incident;
- (g) Identify the date, time and place of the incident; and
- (h) Notify the Agency (in accordance with Condition 2.2) and all other relevant authorities including, where relevant, the Water Services Authority and Inland Fisheries Ireland.

3.19 Communications Programme

3.19.1 The Certificate of Authorisation holder shall establish, maintain and implement a Communications Programme to ensure that members of the public can obtain information from the local authority concerning the closed landfill.

3.19.2 The Communications Programme shall inform members of the public what they can and should do to protect their property and health.

3.19.3 The local authority shall, as part of the Communications Programme, publish landfill gas, landfill leachate, groundwater and surface water monitoring data biannually in a manner accessible by the public.

<p>Reason: <i>To make provision for the proper closure of the activity ensuring protection of the environment.</i></p>

Part III: Schedules

Schedule A: Monitoring

A.1 Leachate Monitoring

Monitoring locations: Leachate monitoring borehole LH01 as per Figure titled 'Ahascra Historic Landfill' from the application correspondence dated December 2022.

Parameter	Monitoring frequency
Biochemical Oxygen Demand (BOD) (mg O ₂ /l)	Biannually
Ammonium (µg/l N)	
Molybdate Reactive Phosphorus as P (µg/l)	
Chloride (mg/l)	
Barium (µg/l)	
Manganese (µg/l)	
Phosphorus (µg/l)	
Potassium (mg/l)	
Calcium (mg/l)	
Iron (mg/l)	
Relevant Heavy Metals (µg/l)	
Total Polycyclic Aromatic Hydrocarbons	
Other parameters as may be required by the Agency.	

A.2 Landfill Gas Monitoring

Monitoring locations: Boreholes BH01 (BH-GW-01), BH02 (BH-GW-02), BH03, OLD-BH-01, OLD-BH-02, OLD-BH-03, OLD-BH-04, OLD-BH-05, OLD-BH-06 and the proposed gas vent as per Drawing No. P1766-0101-0003 from the application correspondence dated December 2022; and

The biological filter if installed in accordance with Condition 3.1(d)(iii).

Parameter	Monitoring frequency ^{Note 1}
Gas flow (m ³ /hr)	Quarterly
Methane (CH ₄ %v/v)	
Carbon dioxide (CO ₂ %v/v)	
Carbon Monoxide (CO %v/v)	
Oxygen (O ₂ %v/v)	
Hydrogen sulphide (H ₂ S %v/v)	

Note 1: Landfill gas monitoring shall be carried out in accordance with the EPA Landfill Manuals – Landfill Monitoring and the EPA Air Guidance (AG) Notes, including any subsequent amendments.



A.3 Surface Water Monitoring

Monitoring locations: SW01, SW02 and SW03 as per Figure titled 'Ahascra Historic Landfill' from the application correspondence dated December 2022; and

The outlet from the proposed site water drainage system, as required under Condition 3.1(h).

Parameter	Monitoring frequency
Biochemical Oxygen Demand (BOD) (mg O ₂ /l)	Quarterly
Total Ammonia (mg N/l)	
Molybdate Reactive Phosphorus as P (mg/l)	
Chemical Oxygen Demand (mg/l)	
Lead (µg/l)	
Manganese (µg/l)	
Relevant Heavy Metals (µg/l)	
Benzo(a)pyrene (µg/l)	
Coliform bacteria (number/100ml)	
Other parameters as may be required by the Agency.	As required by the Agency



A.4 Groundwater Monitoring

Monitoring locations: Monitoring locations BH-GW-01 (BH01), BH-GW-02 (BH02) and BH03 as per Figure titled 'Ahascra Historic Landfill' from the application correspondence dated December 2022.

Parameter	Monitoring frequency
Biochemical Oxygen Demand (BOD) (mg O ₂ /l)	Quarterly
Ammonium (µg/l N)	
Molybdate Reactive Phosphorus as P (µg/l)	
Chloride (mg/l)	
Alkalinity, total CaCO ₃ (mg/l)	
Arsenic (µg/l)	
Manganese (µg/l)	
Phosphorus (µg/l)	
Potassium (mg/l)	
Iron (mg/l)	
Total Petroleum Hydrocarbons to include Mineral oil >C10-C40 (mg/l)	
Total Polycyclic Aromatic Hydrocarbons	
Relevant Heavy Metals (µg/l)	
Coliform bacteria (number/100ml)	
Other parameters as may be required by the Agency.	

Signed on behalf of the said Agency

On the 24th day of October, 2023


Ray Cullinane, Authorised Person