

Áras an Chéimne,
Cross na Fadóirí, Gaillimh,
H91 H6KX.

Áras an Chiontae,
Prospect Hill, Galway,
H91 H6KX.

Fón/Fone: (091) 509 030
Facs/Fax: (091) 509 010
Líne/Weib: www.gaillimh.ie
www.galway.ie

@GalwayCoCo
GalwayCounty

Seirbhís Corparáideachán
Corporate Services
☎(091) 509 225
✉ corpserv@galwaycoco.ie

Tithiú/it
Housing
☎(091) 509 300
✉ housing@galwaycoco.ie

Timpúallacht & Tréidliacht
Environment & Veterinary
☎(091) 509 510
✉ environment@galwaycoco.ie

Bóithre, Iompar, Cóireál Mara
& Seirbhís Ginearálta
Roads, Transportation, Marine
& General Services
☎(091) 509 309
✉ roads@galwaycoco.ie

Acmhábnaí Daonna
Human Resources
☎(091) 509 303
✉ hr@galwaycoco.ie

Mótarsháin
Motor Taxation
☎(091) 509 099
✉ motortax@galwaycoco.ie

Clár na dToghthóirí
Register of Electors
☎(091) 509 310
✉ electors@galwaycoco.ie

Seirbhís Uisce
Water Services
☎(091) 509 505
✉ water@galwaycoco.ie

Pobal & Fiontar
Community & Enterprise
☎(091) 509 521
✉ community@galwaycoco.ie

Plannáil
Planning
☎(091) 509 308
✉ planning@galwaycoco.ie

Leabharlann
Library
☎(091) 562 471
✉ info@galwaylibrary.ie



Comhairle Chontae na Gaillimhe Galway County Council

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



25th March 2024

Ref. No.H0192-01

Re: Notification in accordance with Regulation 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 Tuam Historic Landfill at Rinkippen, Tuam, County Galway.

Representations from Galway County Council.

A Chara,

Further to receiving notification of a draft Certificate of Authorisation (CoA) for Tuam Historic Landfill, Rinkippen, Tuam, 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 license conditions ;

Condition 1.3 : In consideration that a Certification of Registration application is to follow for the Civic Amenity Site (CAS) and the possibility that this CoA will be in place before the application is processed, we request this condition is modified to allow the CAS to operate during the application process. Tuam CAS operates six days a week with a footfall of approximately 14,000 customers / annum.

Condition 1.2 : As the CAS is within the boundary of the closed landfill, please consider an amendment to allow waste acceptance for the reasons set out in our proposal for Condition 1.3.

Condition 2.4 : The local authority have heretofore relied on department funding to progress the historic landfill licensing program and will continue to depend on this support to implement restoration measures. This dependency must be recognized in the setting of expectations and timeframes within the license.

Conditions 3.1 e,f : As noted in the Tier 3 report there were no leachate breakouts observed by the consultant during the risk assessment and the scenario presented in Section 2.5 of the Tier 3 report is a hypothetical occurrence and 'an especially conservative assessment'. Furthermore the repairs to the landfill capping as required by this CoA will serve to prevent any potential leachate breakout.

We feel that the assessment sought in Condition 3.1 (e) has already been undertaken as part of the risk assessment for the landfill site (See in particular sections 2.5 & 2.7 of the Tier 3 report).

A cut off barrier system is a significant body of remediation work which could delay the overall completion of the project if the need or otherwise for its installation is not certain at the finalisation stage of the CoA.

Condition 3.1 g : We request rewording to limit the grass seeding to the landfill mass area.

Condition 3.2 : We request that the erection of the prescribed Site Notice Board is deferred until at least after planning permission and funding have been approved for the remedial works. To display a public notice in the timeframe as prescribed will be misleading to the public's perception regarding compliance and unfair to the license holder.

Condition 3.4 : In order to define the scope of this requirement please schedule the wells for monitoring. We note the Hydrogeology section of the Inspectors Report provide details on this topic. Please note that permission for inspections of private wells may not be forthcoming. Please also schedule the parameters for monitoring as it is not clear what is expected given the current wording ('appropriate monitoring').

Condition 3.6 : Comment on Condition 2.4 applies here also.

Condition 3.8 : In respect to the timeline and to align with other time bound conditions with this draft please add "or as otherwise agreed by the Agency".

Condition 3.9(a) : For the purpose of recording please provide guidance on inspection criteria.

Condition 3.9 (f) : Please provide specifics on the trace organics substances in mind.

Condition 3.10 : Please provide guidance/schedule criteria for review.

Condition 3.11 : Clarify the type,method and extents for outdoor monitoring and the impacts that are expected to be assessed in the outdoor & indoor settings.

Condition 3.15 : As the infrastructure and equipment will not be installed at the time of grant of the CoA, it would be more practicable to link this requirement to a Certificate of Completion for the remedial works.

Condition 3.16.1 : There is not a need for this condition considering there is no Groundwater monitoring wells or boreholes required to be constructed in this draft CoA

Schedule A:

Monitoring (A1, A3 & A4) : Please clarify what is meant by "Relevant Heavy Metals"

Monitoring (A4) :The EPA landfill monitoring manual Table C.2 does not require groundwater samples to be analysed for BOD

Mise, le meas,



Colin Ryder,

Galway County Council.