

**From:** [Colm Lynch](#)  
**To:** [historiclandfill\\_applications](#)  
**Subject:** Dingle Historic Landfill H0203  
**Date:** Monday 22 July 2024 16:28:00  
**Attachments:** [CoA Representations Dingle.docx](#)  
[CoA Representations Dingle.pdf](#)

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Dear Sir/Madam,

I refer to the Draft Certificate of Authorisation in respect of Dingle Historic Landfill (H0203) which was issued on 25<sup>th</sup> June 2024.

Kerry County Council (KCC) wishes to make representations to the proposed Draft CoA – refer attached document in Word and pdf.

Please acknowledge receipt of email.

Colm Lynch  
Executive Engineer  
Kerry County Council

*Cé gur féidir liom ríomhphoist a léamh agus a sheoladh lasmuigh de ghnáthuaireanta oibre, nílim ag súil le freagra ná gníomh uaitse lasmuigh de d'uaireanta oibre féin. While I may read and send emails outside normal working hours I do not expect a response or action outside your own working hours.*



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

22<sup>nd</sup> July 2024

Re: Representations in relation to Draft Certificate of Authorisation for Dingle H0203

Dear Sir/Madam,

I refer to the Draft Certificate of Authorisation in respect of Dingle Historic Landfill (H0203) which was issued on 25<sup>th</sup> June 2024.

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 (h): Gas management system drawing is: P1788-0101-0001

Condition 3.4: Clarification is sought on what is meant by "appropriate monitoring"?

What wells are referred to here?

The ERA states GW direction is NW to SE

The inspectors report states:

There are two water boreholes south-west of the site and five boreholes north-east of the site within 1.5km of the site. Due to the fact that groundwater beneath the site flows towards the south-east, there will be no impact from the landfill leachate on these water boreholes.

Condition 3.8: It is considered that “unless otherwise agreed” should be added to “within three years of the date of grant” as KCC considers the three-year timeframe may be 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 (h) requires gas monitoring in BHs within the waste body. The EPA decision tree states TRIGGER LEVEL OF >30% CH<sub>4</sub> CONCENTRATION (EPA/GOLDER 2011 - INSIDE WASTEBODY). Please clarify.

Condition 3.9 (f): Does the screening of groundwater for trace organic substances relate to BH01 and BH02?

What specific trace organic substances are being referred to?

Condition 3.10: Clarification is required in relation to what the biannual review of the gas management 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 3.20: Clarification is requested in relation to what is involved in a Communications Programme and how long this programme should be continued.

Schedule A1: Does Phosphorus refer to Total Phosphorus?

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 for Leachate in Table C2 of the Landfill Monitoring Manual.

Schedule A3: Why is there a requirement to monitor fluoranthene?

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 for Leachate 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"?

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Colm Lynch', written in a cursive style.

Colm Lynch

Environmental Services

Kerry County Council

Maine Street,

Tralee

Co. Kerry

V92 AP2W