

30<sup>th</sup> August 2022  
Our ref: GCU0281004/SPC/TVM

Mr. Ciaran Cuddihy,  
Office of Environmental Enforcement,  
Environmental Protection Agency,  
Southeast Waste Enforcement,  
Wexford.

Attention: Mr. Ciaran Cuddihy

**Subject: Technical Amendment Request W0254-01**

Dear Mr. Cuddihy,

We act on behalf of the licensee Walshestown Restoration Limited (WRL), who operate a waste management facility for the acceptance, processing, recovery and disposal of imported waste material. The facility operates under EPA Waste Licence Register number W0254-01 in Walshestown, Naas, County Kildare.

WRL wish to apply for a Technical Amendment to Schedule A.2 *Waste Acceptance*, Table A.2.3 *Limit Values* of Waste Licence W0254-01, so that the same parametric limits are applied to all List of Waste (LoW) Codes the facility is authorised to accept.

The WRL facility is currently licensed to accept LoW codes 17 05 04 and 17 05 06 (among others), and the current parametric limits that apply to these two LoW codes are as follows (as per Technical Amendment A granted by the EPA on 27 May 2020):

- Up to three times the inert limit specified in EC Council Decision, 2003/33/EC for sulphate, chloride, antimony, selenium, molybdenum, arsenic, Total Dissolved Solids (TDS).
- Up to two times the inert limit specified in EC Council Decision, 2003/33/EC for the parametric limit of Total Organic Carbon (TOC).

The parametric limits that apply to all other LoW codes the WRL facility is licensed to accept are currently as specified in Section 2 of the Annex to EC Council Decision 2003/33/EC.

We respectfully request that Waste Licence W254-01 is amended so that the parametric limits that currently apply to LoW codes 17 05 04 and 17 05 06, apply to all LoW codes that the WRL facility is currently authorised to accept, and to LoW Codes that may be authorised by the EPA in the future, under Note 1 of Table A.2.1 in Schedule A of W0254-01:

*“Note 1: Any proposals to accept other compatible non-hazardous waste streams must be agreed in advance by the Agency and the total amount of waste must be within the amount specified.”*

### **Background to Limit Values**

Technical Amendment A, dated 27 May 2020, amended W0254-01 to permit LoW Codes 17 05 04 and 17 05 06 to be accepted with parametric limits above those specified in Section 2 of the Annex to EC Council Decision (2003/33/EC). Technical Amendment A was supported by a Hydrogeological Risk Assessment (HRA), which used LandSim modelling to quantitatively assess any potential risk to groundwater arising from a theoretical leakage of leachate through the engineered basal liner of the inert waste landfill at WRL.

The HRA demonstrated that even if all waste imported had initial leachate concentrations of three times the inert Waste Acceptance Criteria (WAC) for metals (arsenic, barium, cadmium, total chromium, copper, lead, mercury, molybdenum, nickel, tin, selenium and zinc), chloride fluoride and sulphate, the risk to groundwater would remain acceptable. The HRA also provided separate justification for increasing the TDS and TOC site specific limits.

The application for Technical Amendment A, dated 5<sup>th</sup> March 2019 stated that the request related to LoW 17 05 04 and LoW 17 05 06 only. However, the HRA and its conclusions are not limited to LoW 17 05 04 and LoW 17 05 06 and may be applied to all LoW coded material currently authorised at the WRL facility for recovery.

Currently the application of separate standards unduly complicates the operation at WRL, which would be improved by a single set of parametric standards. As an example, acceptance of LoW 17 05 04 is permitted with limits of three times inert WAC for specified parameters (as set out in Technical Amendment A). Processing of LoW 17 05 04 material is also permitted at WRL, however, for the same parameters, the resulting material (LoW Code 19 12 09) is only authorized for restoration of the WRL facility at standard inert WAC concentrations (EPA Approval 15<sup>th</sup> February 2019, submission Ref. LR038169).

### **Conclusions**

The requested Technical Amendment will increase clarity and enable more efficient operation of the WRL facility. There is no technical reason for two separate sets of parametric limit values as currently set out in Table A.2.3 of W0254-01. The proposed Technical Amendment will not necessitate the changing of any conditions or tonnage, or other limits contained in the Waste License for the facility other than the outlined change to Table A.2.3.

Please contact the undersigned if you have any questions or comments on the above proposals.

Yours sincerely for  
**Geosyntec Consultants Ltd**



Thomas Vainio-Mattila  
Principal Consultant