

# Overview of Historic Unlicensed Waste Disposal Sites in Ireland



**epa**

Office of  
Environmental  
Enforcement

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# Presentation Layout

- Background
- Registration of historic landfills
- Risk assessment of historic landfills
- Authorisation by the EPA

# Background

## **1975 Waste Framework Directive (75/442/EEC)**

- The incorrect transposition of the Waste Framework Directive meant that municipal landfills operated between July 1977 and 1997 were not subject to a licensing system, with its associated safeguards for the environment such as:
  - Technical requirements;
  - The safety precautions to be taken;
  - Treatment methods and
  - After care and remediation.

## Legislative background

- Waste Framework Directive 1975
- Section 22 of the Waste Management Act 1996
- Ministerial Direction May 2005
- EPA Code of Practice
- SI 524 of 2008:  
“Waste Management (Certification of Historic Unlicensed  
Waste Disposal and Recovery Activity) Regulations 2008”

# Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008

## Duty of local authorities:

1. To identify and register closed landfills by 30th June 2009.
2. To carry out an environmental risk assessment having regard to the EPA's Code of Practice
3. Apply to the Agency for a certificate of authorisation.

## Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008

- Definition of closed landfills

*“closed landfill” means a landfill site operated by a local authority for the recovery or disposal of waste without a waste licence on any date between 15 July 1977 and 27 March 1997*

- Narrower scope than Section 22 of the WMA:

*“the identification of sites at which waste disposal or recovery activities have been carried on”*

# EPA have provided an on line register.

Waste Management Act Section 22 Register - Site Details - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Forward Stop Search Favorites Media Print

Address http://193.1.208.39/LandfillRiskAssessment/SiteDetails.aspx Go Links

admin | Logout

**Waste Management Act Section 22 Register**

**Home**

- Site Details
- Risk Assessment
- Useful Information
- Contact EPA
- Landfill WebGIS
- Administration
- System Users
- Manage Sites
- Reports
- Maps
- Email Users

**Site Details**

Site Id Site Id will be generated

Site Name Ye Olde Town Dump

Waste Category Local Authority

County Wexford

Townland Select Townland

Town Dumpsville

**Start/End Dates**

Start Date 12/06/1981

End Date 18/09/1989

**Holder Details**

Holder of Waste Mr Rick O' Shea

Site Owner Ms Shirley Knott

**Waste Details**

Waste Activity Disposal

Principle Waste Type Municipal

Additional Waste Type C&D

Additional Waste Type Dredged Spoil

Hazardous Waste Present ☐

Estimated Waste Quantity (tonnes) 15000

Verification Method Interviews

**Comments**

Local Town Dump, operated for 8 years. Took in approx 2000 tonnes of municipal waste per annum.

**Site Location**

Please Use the Landfill WebGIS to sketch the site boundary: click Edit/Create to access the drawing tools.

Launch WebGIS

Save Cancel

Done Internet

# Registration of closed landfills

- Currently there are 447 landfills on the Section 22 register.
- 344 are “closed landfills” as defined under SI 524 of 2008
- The reminder are a mixture of:
  - Private sites
  - Pre-1977 sites
  - Illegal Sites.



# Risk Assessment of Closed Landfills

- Local Authorities are required to carry out an assessment of the risk of environmental pollution
- All local authorities are to follow the methodologies set out in the Code of Practice
- The Department of the Environment (DOE) has requested:
  - That all Tier 1 Risk Assessments be completed by the 31<sup>st</sup> December 2009
  - Where practicable, all Tier 2 and Tier 3 Risk Assessments should be completed in 2010.

# Overview of Code of Practice Risk Assessment

## ■ Tier 1:

- Qualitative Risk Assessment (Risk Screening and Prioritisation)

## ■ Tier 2

- Site Investigations and Refining Risk Screening

## ■ Tier 3

- Quantitative Risk Assessment (Detailed Site Specific)

# Tier 1 Risk Assessments

- Conceptual Site Model
- Desk Based study informed by a site walk over.
- Risk Classification: high, medium or low.
- Relatively cheap.
- To date over 220 (64%) Tier 1's are completed:
  - 23% are High Risk
  - 34% are Medium Risk
  - 43% are Low Risk

# Tier 2 Risk Assessments

- Site Investigations and testing.
- The COP defines the required works
- Expensive part of the RA.
- DOE has funded a pilot study:
  - The EPA have developed decision matrices to compliment the COP.
  - These matrices will be issued following testing by the pilot study.
  - Workshop after completion of pilot.

# Tier 2 Risk Assessments: Pilot Study

- **Objective:** to comply with the CoP in the most cost effective manner.
- The pilot will split the Tier 2 Risk Assessments into separate site investigations:
  - Exploratory Investigation
  - Main Investigation.
- These site investigations will be informed by matrices.

View of the 1<sup>st</sup> matrix.

Ready					NUM			
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## Tier 3

- Refinement of CSM

- Site investigation information to be used to refine CSM
- Risk Screening to be re-applied

- Quantitative Risk Assessment (QRA)

- Required for High and Moderate Risk Sites
  - Generic QRA
  - Detailed QRA (site specific)
- Development of Guideline Acceptance Criteria
- If site concentrations are  $<$  Guideline acceptance criteria risk is deemed to be acceptable and no further action required
- If site concentrations are  $>$  Guideline acceptance criteria risk is deemed to be unacceptable and remedial measures required

# Authorisation by the EPA

- Following the completion of the Risk Assessments the local Authority will have to apply to the EPA for Authorisation.
- SI 524 of 2008 contains the relevant conditions for this process.



# Authorisation by the EPA

## **SI 524 of 2008 states:**

- On completion of the Risk Assessment the Local Authority shall apply to the Agency for Cert. of Authorisation Reg. 7 (1).
- As a minimum should contain the information in Reg. 7 (2).
- The Risk Assessment shall form the basis for the Certificate of Authorisation.
- Agency may request further information under Reg. 7 (4)
- Non-technical summary required
- €5,000 fee

## Role of the Agency – Certificate of Authorisation

- Agency to determine the adequacy of the Risk Assessment
- May specify further measures in addition to those identified in Risk Assessment
- Will require that a validation report is compiled

## Issuing of a final Certificate of Authorisation

- Agency will issue a draft Certificate of Authorisation within 4 months, or later if required, of receipt of the compliant application (Regulation 7 (5)).
- Local Authority will have 30 days in which to make representations regarding the proposed draft certificate.
- Final Certificate of Authorisation will issue as soon as practicable after the expiry of the 30 day period, and following consideration of any representations.

# Summary of Main points

- 344 “closed landfills” now registered.
- Risk Assessments are being progressed.
  - Tier 1 to be completed by 31<sup>st</sup> December 2009.
  - Tier 2 and Tier 3 in 2010?
- Pilot Study by DOE into Tier 2 RA's
- Workshop upon completion of the Pilot.
- Certification of Authorisation from the EPA.

# Overview of Historic Unlicensed Waste Disposal Sites in Ireland

- Thank you and safe journey home.