

A Hazardous Landfill for Ireland

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Article 5 of the Irish Constitution proudly proclaims that;
'Ireland is a sovereign, independent, democratic state.'

The Constitution makes reference to the ownership and management of the state's natural resources including;

- Air
- Energy
- Mines
- Minerals
- Waters & Seas

However, the Constitution makes **no reference** to our wastes, hazardous or otherwise !

National Waste Management

- A sovereign and independent state would be expected, where possible, to manage the wastes generated **within** that state without dependence on other states and so;
 - Article 5 of the 1975 Directive on Waste requires Member States to move towards **self sufficiency** in waste disposal
 - This national aspiration is reflected in the 2001 National Hazardous Waste Management Plan (NHWMP) which recommended that;
 - 'In order to apply the proximity principle and to ensure security of hazardous waste recovery and disposal outlets, Ireland should seek to become **self sufficient** in hazardous waste recovery and disposal capacity.'
- NHWMP(2001) recommended;
- 'At least two engineered cells ... should be developed.'
 - '... in the south west and Dublin areas.'
 - 'these cells could be constructed adjacent to existing landfill facilities'

National Hazardous Waste Objectives

The NHWMP (2001) also identified a National Long Term Priority as;

- 'The achievement of **self sufficiency** in hazardous waste management.'
- NHWMP (2001) concluded;
- '**Reliance** on hazardous waste disposal facilities in other countries **is not desirable**.'
- NHWMP (2001) noted that;
- '...Member States **may and do restrict** the movement of waste for disposal'

National Waste Infrastructure

- Waste Management Facilities are a necessary infrastructure for a modern Country.
- Significant progress has been made in the past 5 years in establishing a modern waste management infrastructure.
- Ireland now has many state of the art landfills for non-hazardous wastes.
- Plans are well advanced for incinerators to cater for non-hazardous and hazardous wastes.
- No progress has been made in providing landfill capacity for hazardous wastes.



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Hazardous Waste Waste Statistics

- c. 325,000 tonnes of hazardous waste generated in Ireland per annum
- c. 52,000 tonnes of hazardous waste were exported to Germany for landfilling in 2003 consisting of;
 - *40,000 tonnes of contaminated soils
 - *12,000 tonnes of other hazardous waste
 - Planned Hazardous and Non-hazardous Waste Incinerators will also generate hazardous ash waste

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Achieving Self Sufficiency

- No landfill has planning permission to accept hazardous waste!
- Likelihood of retrofitting a planning permission for a non-hazardous waste site to include hazardous waste would be **LOW**.
- Local Authorities are **unlikely** to seek permission for disposal of hazardous waste.
- Will the private sector develop a landfill for hazardous wastes generated in Ireland?
- Certainty of outcome of the regulatory process & associated costs are major barriers for the private sector.
- Certainty within the current regulatory process lies with a **New Site** for a landfill to accept **both** hazardous and non-hazardous wastes.

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Landfill	County	Planning	Licence
Bottlehill	Cork	Yes	Yes
Knockharley	Meath	Yes	Yes
Ballyguyroe	Cork	Refused	Yes
Annaskinnan	Westmeath	Refused	Yes
Calf Field	Kildare/Meath	Refused	Yes (PD)
Gortadroma	Limerick	Part (5 of 11 Cells)	Yes
East Galway	Galway	Yes	Yes
Usk	Kildare	?	Yes
Drehid	Kildare	?	Yes

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Locating A Landfill For Hazardous Wastes

Regulatory Guidance;

- Landfill Directive - (geological barrier > 5m thick & $k < 1.0 \times 10^{-9} \text{m/s}$.)
- EPA Landfill Design Manual-(geological barrier > 5m thick & $k < 1.0 \times 10^{-9} \text{m/s}$)
- Geological barrier can be completed artificially.
- Principles of GSI/EPA/DOELG Responses for groundwater resources also applicable to siting of hazardous waste landfills
- Geology and Hydrogeology Therefore Critical in Site Selection

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Locating A Landfill For Hazardous Wastes

Guidance from Recent Landfill Oral Hearings

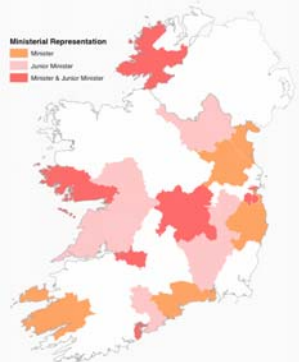
Main Issues or Concerns Raised by Objectors;

- Proximity to dwellings/schools/agri-industries
- Inadequacy of road infra-structure/access
- Pollution of water resources (groundwater and surface water)
- Proximity to waste arisings
- Nuisances e.g odours/litter/vermin/noise
- Property devaluation/Human Health
- Human Health

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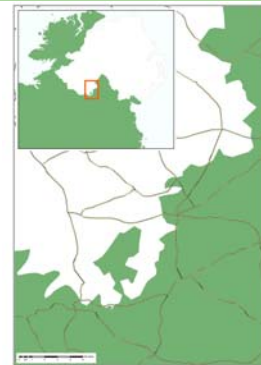
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- *It is not sustainable for Ireland to continue to produce hazardous waste in ever greater quantities without developing appropriate disposal facilities located within our jurisdiction and under our own control.*
- *Such a disposal facility is a necessary element of our developing integrated national waste infrastructure.*
- *Hopefully the 2006 Review of the NHWMP will map a way forward through the many regulatory, political, social and commercial barriers to the provision of this important national asset.*
- *Geology will play a key role in any site selection process and geologists & hydrogeologists will be at the forefront in identifying, testing and monitoring a safe and suitable location for a landfill for our hazardous wastes.*