



Submission

Submitter:	Mrs Elish O'Reilly
Organisation Name:	HSE
Submission Title:	HSE Submission Report
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Application

Applicant:	Knockharley Landfill Limited
Reg. No.:	W0146-04

See below for Submission details.

Attachments are displayed on the following page(s).

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04/12/2019

Environmental Licencing Programme,
Office of Environmental Sustainability,
Environmental Protection Agency,
PO Box 3000 Johnstown Castle Estate,
Co. Wexford

ID Number: 1030

Re: W1046-04

Proposed Development: Review of Industrial Emissions Licence at Knockharley Landfill, Knockharley, Navan, Co. Meath

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above proposal. If you have any queries regarding any of these reports, the initial contact is Elish O'Reilly, Principal Environmental Health Officer who will refer your query to the appropriate person. The following HSE departments were made aware of the consultation request for the proposed development on 23-10-2019

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Pat Bennett

Environmental Health Report

The EH service response to the proposal is in the attached consultation report.

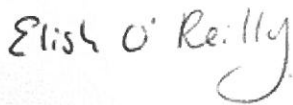
- The assessment is based on an assessment of documentation submitted to this office on 23/10/2019 by Knockharley Landfill Limited
- A site visit was conducted on 31st January 2019 with Mr. Micheal Walker and Mr. Damien Holmes.
- Environmental Health were included at the Screening / Scoping stage of this application
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- No additional investigations / measurements were undertaken.
- This report refers only to those sections of the documents which are relevant to the HSE.

• We have made observations and submissions under the following specific areas (select as appropriate);

Human Health	Air
Noise	Odour
Surface Water	Pest Control
Ground Water	Closure and Decommissioning

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Elish O'Reilly, Principal Environmental Health Officer.

Yours Sincerely,



Elish O'Reilly
Principal Environmental Health Officer

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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3rd December 2019

Ms. Elish O'Reilly
Principal Environmental Health Officer
Co. Clinic
Navan
Co. Meath

Re: Review of Industrial Emissions Licence at Knockharley Landfill

Class and Nature of Activity:

The principal activity is 'Landfill, within the meaning of section 5 (amended by Regulation 11(1) of the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008 (S.I. No. 524 of 2008)) of the Act of 1996, receiving more than 10 tonnes of waste per day or with a total capacity exceeding 25,000 tonnes, other than landfills of inert waste.'

Other activities include – 'Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply): physico-chemical treatment.'

'Recovery, or a mix of recovery and disposal, of nonhazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply): treatment of slags and ashes.'

'Recovery, or a mix of recovery and disposal, of nonhazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply): biological treatment; when the only waste treatment activity carried out is anaerobic digestion, the capacity threshold for this activity shall be 100 tonnes per day.'

'The recovery or disposal of waste in a facility, within the meaning of the Act of 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required.'

Applicant: Knockharley Landfill Ltd

Location of Facility: Knockharley, Navan, (Includes Townlands of Tuitterath & Flemingstown) Co. Meath, C15 FX09.

EPA Reference No: W1046-04

EHIS Ref No: 1030

This report only comments on Environmental Health Impacts of the proposed development as outlined in the documents submitted by the applicant and the adequacy of the licence application from an EH viewpoint. We have made observations and submissions on the following specific areas:

Description of project:

Knockharley Landfill Ltd (KLL) currently operates under Industrial Emissions Licence W0146-02. This licence authorises the acceptance of 200,000 tonnes of non-hazardous waste annually for disposal and recovery. This application seeks to intensify the existing permitted landfill by increasing the rate of waste acceptance and increasing the height of the landfill.

It is proposed to increase the annual waste acceptance rate to 435,000 tonnes, which will comprise up to 150,000 tonnes of incinerator bottom ash (IBA), as well as municipal solid wastes, including organic fines, non-hazardous contaminated soils, construction and demolition (C&D) wastes and baled recyclables. 5,000 tonnes per annum of stable non-reactive hazardous waste will also be accepted for co-disposal with the non-hazardous wastes. The IBA will be pre-treated and temporarily stored in dedicated landfill cells. The residual organic fines will be treated in a new on-site biological treatment plant, with the treated solid outputs used as daily cover. A leachate treatment plant will be installed to pre-treat leachate from the non-hazardous waste cells, the IBA cells and the biological treatment plant. The proposed change requires a revision of the IE licence.

Site Location:

The landfill is located in the townland of Knockharley, approximately 10 km east of Navan Town and 1.5 km to the north of Kentstown village in County Meath. The closest inhabited residential dwellings are located to the northern and eastern site boundaries.

The facility is located on a 135.2 hectare (333-acre) site. The existing landfill footprint is positioned near the centre of the landholding and occupies approximately 25 hectares. This site has been in operation since 2004. The landfill accepts residual household, commercial and industrial wastes together with construction/demolition wastes and incinerator bottom ash.

The site is sloped with elevations ranging from 70 mOD in the north west to 55 mOD in the south east of the site. The site is a mix of constructed landfill and associated facilities with some woodland and wet grassland. The aquifer is given a Low Vulnerability rating by the GSI website. Four designated sites and one area of scientific interest are located within 5km of the site.

Public Consultation:

Scoping with relevant statutory and non-statutory stakeholders was carried out by the applicant. A total of 29 recipients were consulted.

A public information event was held to introduce the proposed development to the public in November 2016. The event was advertised in the local paper the week before. A total of 15 people attended this event and one completed comment card was included in the EIAR. It is stated that the public's main concerns are the potential for negative impacts associated with traffic, odour and noise and queries in relation to the contributions relating to the existing Community Fund.

The applicant states the issues raised have been addressed, where practicable, in the relevant sections of the main volume of this EIAR.

Operation:

The proposed development at Knockharley Landfill is to intensify waste acceptance at the facility to 445,000 tonnes per annum from the current 200,000 tonnes per annum. This appears to be in contravention of planning conditions from An Bord Pleanála which restricts the rate of waste acceptance to 88,000 tonnes per annum.

Broadly, the waste types to be accepted as part of the proposed development are the same as those currently accepted at the facility, with the addition of two new waste types; stable non-reactive hazardous waste (maximum 5,000 tonnes per annum) and baled recyclable waste. The general public can request sight of all monitoring data associated with the landfill and this practice will continue after review of the existing facility licence.

No changes to the hours of operation are proposed. It is anticipated that 17 personnel shall be employed on a full-time basis when the proposed development is operational. All non-process related wastes generated onsite (from administration building, weighbridge office etc.) will be managed by a suitable waste management contracting company and will be taken off site for treatment at relevant approved waste management facilities.

Human Health:

Chapter 6 of the EIAR assessed the likely significant effects of the proposed development on population and human health, employment and socio-economics, land use, recreation, amenity and tourism. The EIAR states that health based standards were taken into direct consideration in Chapters 7 Air and Climate, Chapter 9 Noise, Chapter 11 Land, Soils and Geology and Chapter 12 Hydrology and Surface Water Quality.

A human health risk assessment was undertaken to establish any significant health effects from the proposed development. A review of health related literature was also carried out. The EIAR advises that much of the literature and scientific evidence reflects information on landfill emissions relating to older technologies. These technologies may not reflect the more advanced engineering and emission control technologies in place at Knockharley.

The EIAR references “A review of the Health and Environment, Effects of Landfilling and Incineration of Waste – A Literature Review” carried out by (Dublin Institute of Technology) DIT in 2003. This study “concludes that interpretation of evidence from epidemiological studies is especially difficult to determine and that while many studies have been undertaken, evidence from research shows that wide ranging value judgements are often made. Evidence between specific health outcomes and landfill exposure is still inconclusive.”

The conclusion drawn at the end of this Chapter is that appropriate mitigation measures for potential significant effects on population and human health associated with noise, air, surface water, groundwater and soil are identified in full in their respective chapters.

Noise:

Construction noise has been assessed in conjunction with operational noise as it is stated that construction will take place on a phased basis and will occur simultaneously with operational activities on site.

The ambient noise levels measured at noise monitoring location N2 were used to determine the appropriate construction noise limit for the proposed development in accordance with the ‘ABC Method’. The applicant added a correction of +3dB to the noise levels to convert free-field noise levels to façade noise level. And the nearest residential dwellings to the proposed development are afforded Category A designation (65 dB LAeq, 1hr during daytime periods).

The predicted construction noise levels at the nearest noise sensitive locations were calculated and noise modelling was carried out based on a worst-case construction scenario. Construction related traffic was also included in this noise appraisal. The cumulative construction impacts and operational impacts were appraised, and it was found that the predicted noise impacts are compliant with the 65 dB LAeq, 1hr noise limit derived from BS 5228-1:2009+A1:2014.

The noise appraisal was based on a worst case scenario, the EIAR states that the actual noise impact shall be less than that modelled. No reference was made to the tonal or impulsive nature of the noise in this appraisal.

The applicant states that the construction works on-site will be carried out in accordance with the guidance set out in BS 5228:2009+A1:2014. Specific noise control measures are outlined in the Construction Environmental Management Plan, included in the EIAR.

The noise sources around the site are typically rural with more noticeable traffic noise from the N2 National Primary route to the east of the site. Quarterly noise monitoring is ongoing in accordance with the IE licence and it is undertaken at four boundary locations. In the period 2015 to Q3 2018, there have been no exceedances of the daytime noise limit at the facility. It is noted that 8 noise/vibration complaints were made in 2016, 14 in 2017 and 4 in 2018. All complaints were investigated and closed off on EDEN (the EPA web-portal for licensee reporting) with the applicant stating that “*the boundary noise levels measured were compliant with the daytime noise limit.*”

Information regarding the background noise environment prior to development was not provided in the application documents. The applicant has not compared operational noise levels with the pre-existing noise environment and has not assessed the significance of any change in the noise environment due to the operation of the landfill.

The operational noise impact appraisal of the proposed development was carried out with reference to the existing Industrial Emissions licence W146-02 and the *Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)*, EPA 2016. A total of 72 receptors were modelled and noise sensitive locations within 500m of the development boundary were appraised. The predicted noise levels associated with stationary or minimal movement sources, as well as on-site traffic movements at the site were predicted according to the International Standard ISO 9313-2: 1996 *Acoustics -Attenuation of sound outdoors - Part 2: General Method of Calculation* and using Brüel & Kjær Predictor software. Both daytime and night-time scenarios were modelled. The EIAR advises that the noise modelling assessment assumed worst case scenarios and the noise impact from the proposed development will be lower than the predicted noise levels presented.

There are 3 no. scenarios where the predicted noise levels are above the daytime noise limit at 4 no. receptors. These exceedances are predominantly attributed to the felling of trees and the construction of two earth berms. It is expected that the maximum noise levels predicted will be for a short duration, 1 week for tree felling and 2-3 weeks for each berm. Short term elevated noise levels may be expected during construction of the berms but these berms will ultimately protect the noise sensitive locations in the long term.

The EIAR advises that the operational noise impact from the remainder of the proposed development will also be below the daytime noise limit.

The proposed development at Knockharley Landfill is to intensify waste acceptance at the facility to 445,000 tonnes per annum from the current 200,000 tonnes per annum. This has potential to double traffic to and from the landfill. The potential traffic noise impacts have been assessed with respect to the *"Highways Agency's Design manual for roads and bridges HD 213/11 Volume 11, Section 3, Part 7 Revision 1 – Noise and vibration."* Both the existing landfill traffic and the traffic associated with the proposed development were included. The predicted noise from road traffic was modelled using CRTN7. When the predicted operational traffic flow is added to the existing baseline traffic flow, the baseline noise level shows a negligible increase in predicted traffic noise level. The EIAR states that the additional traffic on the N2 National Primary Route will result in a negligible increase in noise levels at noise sensitive locations.

Surface Water:

The applicant states that the existing and proposed development has been designed to prevent negative impacts on hydrology and surface water.

A number of mitigation measures to prevent surface water pollution, runoff and sediment release have been outlined by the applicant both in Chapter 12 of the EIAR and in the Construction and Environmental Management Plan.

Currently runoff from the permitted facility drains via an operating drainage system from the landfill facility and is directed towards the southern storm water attenuation pond and afterwards to a constructed wetland before it is discharged to the Knockharley/Flemingstown Stream. It has been concluded that this existing surface water attenuation pond is adequate to provide for the new development in the southern catchment of the site i.e. drainage from the proposed biological treatment facility and leachate management facility. (Note: Slight adjustments to the outlet control are required.)

It is proposed to develop an additional storm water outfall on the northern boundary to accommodate surface water run-off from the "northern catchment" within the facility. There shall be continuous monitoring of attenuation pond discharge (total organic carbon, pH, conductivity and turbidity) and there will be an automatic discharge shut-off in the event of an exceedance.

Rainfall on the undeveloped parts of the site shall discharge directly to the surface water drainage system. Rainfall on active fill and waste storage areas is collected in the leachate collection system. The surface drainage from all roads, capped areas and hard standing areas is directed to the surface attenuation pond via an oil interceptor. Drainage from the existing waste inspection areas and quarantine bays is directed to the leachate lagoon. Drainage from the biological treatment facility will be directed to an underground leachate tank. French drains shall be installed adjacent to perimeter roads surrounding the IBA facility to direct runoff into the leachate collection system.

Groundwater:

The site is located in a locally important aquifer, which is classed as 'moderately productive only in local zones (LI)'. The site is given a 'Low Vulnerability' rating by the GSI. Mains water is available in the area. The GSI lists two wells within 1 km of the site boundary and a further seven wells within a 5 km radius of the site boundary, the majority of which are down-gradient. The existing groundwater wells on site are monitored on a regular basis in accordance with the IE licence. The results indicate that site activities are not impacting on the groundwater quality.

A groundwater risk assessment was completed in February 2015 which assessed the landfill design and construction, including remedial measures, the type and age of the waste, the geological and hydrogeological conditions and any sensitive receptors. This investigation concluded there was no evidence that the landfill has impacted on groundwater quality down-gradient of the site.

A ground water drainage system will be installed to accommodate prevailing site conditions upon which the engineered clay barrier will be installed and compacted to 95% maximum dry density. All cells, whether in the permitted landfill development or proposed IBA Facility, will require a composite lining in accordance with the Landfill Directive for non-hazardous cells.

The surface water lagoon and the holding pond will be constructed using a similar lining system as the cells. All above ground tanks for leachates or other treatment related products will be bunded to contain a minimum storage volume. Diesel tanks, used to store fuel for the various items of machinery, will be self-contained and double-walled. Refuelling will be carried out from these tanks or from delivery vehicles at a designated refuelling area. There are also emergency response procedures in place to address possible spillages.

Air:

An Air Quality Assessment was carried out in line with the Air Quality Standards Regulations 2011, which incorporates the European Commission Directive 2008/50/EC. The appraisal carried out includes the operation of the existing facility along with elements of the proposed new development including; the intensification of the rate of waste acceptance, the storage of incinerator bottom ash (IBA), the biological processing of residual municipal solid waste (MSW) fines and the storage and treatment of leachate.

Currently on site there is a requirement to monitor dust deposition, PM10's, landfill gas, emissions from the landfill gas flares and utilisation plant, as well as volatile organic compounds (VOC) from the surface of the landfill. Odour assessments are carried out by the licensee in accordance with AG51 published by the EPA.

The operation of the proposed facility could result in potential emissions to air from the gas utilisation plant, dust, vehicle emissions from transferring waste to site, odour emissions from deposition or handling of waste and from the biological treatment plant. The EIAR states that conservative assumptions have been made with regard to modelling parameters.

To assess the potential impact of emissions from the landfill gas utilisation plant an air dispersion modelling study was undertaken in accordance with the EPA GN4 'Air Dispersion Modelling from Industrial Installations'. Emissions from the landfill gas flares and utilisation engines have been modelled using the air prediction model AERMOD. The results of the modelling assessment indicate that predicted emissions are in compliance with the statutory limits set out in the EU Ambient Air Quality Directive (EU 2008/50/EC) at any nearby sensitive receptor. The predicted concentrations are below AG4's maximum allowable PC for all pollutants. On this basis the significance of impact of emissions from the gas utilisation plant on human health is considered to be 'Not significant'.

The assessment of the impact of vehicle emissions during the operational phase was carried out. The increase in emissions between existing traffic movements and the operational phase (Year 6 scenario) were compared to NRA guidelines. The comparison indicates that during year 6 operations the impact from increased traffic flows on sensitive receptors will be imperceptible along the N2. Along the R150 there will be a medium increase in NO₂ and a small increase in PM10's, however it is stated these increases will result in an impact deemed negligible according to the NRA guidelines. Predicted vehicle emissions associated with the proposed development are within the relevant air quality guidelines and therefore will not impact on ambient air quality. The EIAR advises that no mitigation measures are required.

Operational controls such as maintaining high moisture content of IBA will be undertaken to ensure a high degree of compaction within the landfill to prevent dust emissions. Site management mitigation measures will continue to be implemented to prevent dust nuisance during the operation of the facility.

With regard to the proposed biological treatment facility it is stated that all activities associated with the proposed composting process will be carried out indoors. An air handling system and fast shutting doors will be installed thus minimising emissions from the facility to a point source through a biofilter. Potential emissions from the biofilter at the proposed biological treatment facility will include ammonia, hydrogen sulphide and bio-aerosols.

The applicant quotes evidence from the Scottish EPA which indicates that removal of these compounds by a biofilter and scrubber type system will be greater than 90%. The nearest sensitive receptor is 346m from the closest point on the building. Given the distance of the receptors from the stack (>350m), the enhanced dispersion characteristics of the biofilter emissions stack (20 m tall stack with an exit velocity of 27 m/s) and relatively high limit values for these pollutants the predicted impact is low. It is stated that the monitoring of bioaerosols will be included in the new monitoring regime. A continuous monitoring system under SCADA control will monitor the operation of the air control system at the biological waste treatment facility. Any deviations in key design parameters will be detected and appropriate preventative maintenance will be undertaken to minimise air emissions.

Odour:

The data provided in the EIAR indicates that odour from the site has impacted on local residents. 140 complaints were received in 2016, (the EPA issued 3 non-compliance notices in 2016), 21 odour complaints in 2017 and 5 odour complaints in the first 4 months of 2018. An odour impact assessment was carried out by Odournet UK Ltd to estimate the magnitude of odour emissions that are likely to be generated from the site and to gain an understanding of the main contributors to such emissions. It has also assessed the implications of these changes on odour exposure and impact risk. The study was conducted using odour impact assessment techniques that comply with the requirements of AG4, published by the EPA and also guidance published by the UK Environmental Agency (H4) and the UK Institute of Air Quality Management.

An odour dispersion model was used to assess predicted offsite odour exposure and impact risk. Existing baseline conditions were modelled along with a do nothing scenario, the proposed development in year 4 and year 6 (final stages) of its lifespan. The odour impact assessment states that the facility has permission to accept 88,000 tonnes per annum of waste. The odour impact modelling of baseline conditions was based on these figures. It was noted in Chapter 2 of the EIAR that 200,000 tonnes of waste are currently accepted at the facility. It would appear that the calculations used in the odour impact assessment are not consistent with the actual waste disposal rate on site.

The odour emissions generated from the landfill were estimated in terms of European odour units. A series of field assessments were also conducted under current baseline conditions to assess the veracity of the odour model. Odour impact threshold levels were set (highly offensive odours for landfill and moderately offensive odour for the biological treatment facility) against which the estimated emission limits were compared and evaluated. (It is stated that this threshold level is precautionary however it is the experience of Odournet UK that significant adverse odour impacts can develop at these low levels). The emissions from the biological treatment facility are not predicted to pose any risk of odour impact at any area within or outside the facility.

Modelling carried out to assess baseline conditions on the site show a total of 12 properties that are currently exposed to odours above the risk threshold applied for landfill. As exposure levels increase above these threshold levels, the probability of a significant impact occurring also increases. The actual level of increase is not shown in the odour impact assessment; it only states that 12 properties are currently above the threshold limit. Furthermore, there is a

possibility these baseline conditions may be inaccurate given the lesser volume of waste (88,000 tpa) which was used in the odour impact assessment. The odour impact assessment concludes that the total odour emissions generated from landfilling activities are predicted to decrease as a result of the proposed development; however there will still be 4 to 6 properties that will be exposed to odour levels that exceed the threshold where a potentially significant risk of odour impact could develop.

Pest Control:

The applicant has implemented mitigation measures to control vermin and pests on the site.

Closure & Decommissioning:

A revised closure, restoration and aftercare plan will be agreed to address the aftercare period when: waste acceptance within the landfill body ceases, waste acceptance at the IBA facility ceases, waste acceptance at the biological treatment facility ceases. Knockharley Landfill Ltd. has put in place the financial provision to cover any liabilities associated with the operation of the facility including closure and aftercare of the facility.

Conclusions:

1. The applicant has applied to An Bord Pleanála for a Strategic Infrastructure development. An Bord Pleanála have not made a final decision regarding the proposed development and have requested further information from the applicant. It is our opinion that the final planning decision could influence the determination or conditions of the waste licence and the waste licence application is premature in this instance.
2. The applicant has advised that a number of noise complaints were received from 2016 to 2018 as a result of site operations. The EIAR states that the public raised the issue of potential noise impact during the consultation process.

The applicant stated that the noise complaints were investigated and it was established that the boundary noise levels were within the daytime noise limit set in the IE licence. This service recognises that adherence to specified noise limit values may not protect sensitive receptors from noise nuisance.

It is advised that noise levels should be compared to pre-development baseline results when investigating noise complaints. The significance of the change in the noise environment should be assessed in line with *BS4142 Method for Rating Industrial Noise Affecting Mixed Residential and Industrial Areas*. The tonal and impulsive nature of the noise source must also be taken into account.

3. The odour baseline conditions in the odour impact assessment were established using modelling based on a rate of disposal of 88,000 tonnes per annum. The actual rate of waste disposal on site appears to be 200,000 tonnes per annum, more than double the volume of waste that was used to establish baseline odour conditions. It is recommended that the odour impact assessment is based on the actual rate of waste disposal in order to provide an accurate reflection of existing site conditions.

4. The results of modelling for odour impact assessment indicate that 12 properties are currently exposed to odour levels that exceed the threshold where a potential significant risk of odour impact could develop. Modelling has shown that 4-6 properties will exceed this threshold as a result of the proposed development. There have been several odour complaints lodged over the past 2 and a half years, it is clear that odour nuisance does impact on the lives of some residents in the vicinity of the landfill.

The odour impact assessment states "*the characteristics of the odour generated from the landfill process, in terms of intensity and offensiveness, will ultimately depend upon the age, type and quality of waste received.*"

The waste acceptance criteria for the landfill facility is of the utmost importance as it can have an impact on odour nuisance. In line with the recommendations of Ireland's Waste Management Policy, A Resource Opportunity, 2012, and with the aim of reducing the adverse odour impact for residents, the types and quantities of waste proposed to be accepted at the facility should be reviewed and more onus placed on accepting wastes which have received pre-treatment or stabilisation processes. The biological treatment of the organic fraction of municipal solid waste on site is welcome as it will have a beneficial effect on odour exposure and reduce the volume of waste being landfilled.

Lisa Maguire

Lisa Maguire
Environmental Health Officer

Carmel Lynch

Carmel Lynch
Environmental Health Officer

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