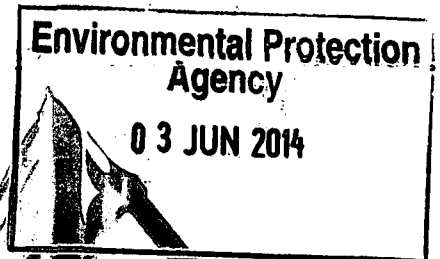


**EPA,  
Headquarters,  
PO Box 3000,  
Johnstown Castle Estate,  
Co Wexford.**

**For the attention of Brian Meaney, Senior Inspector.**

29<sup>th</sup> May 2014.

**Re: Ballydonagh Landfill  
(Waste Licence Register No W0028-03)**



Dear Brian,

Under Sect 42b of the Waste Management Act 1996, a technical amendment is sought to increase the CO Emission Limits for Utilisation Plant as provided for in Table C5 of the licence for the closed landfill at Ballydonagh. The current emission limit for CO is 650mg/m<sup>3</sup> and it is sought to increase this to 1400mg/m<sup>3</sup>, which would be in line with the limit on this Council's other closed landfill at Marlinstown.

Westmeath County Council are on the brink of awarding a contract for landfill gas utilisation at Ballydonagh and the preferred Bidder has sought this amendment as a pre-condition for signing the contract on the basis that the lower CO limit is practically unachievable given the calorific value of the available landfill gas. Significantly, this contract is part of a Regional Tender which involves the landfills at Laois Co Co (Kylatelesha) and Offaly Co Co (Derryclure). Both of these landfills have CO limits of 1400mg/m<sup>3</sup> and the same preferred Bidder is in place.

This 650mg/m<sup>3</sup> limit was not included in the original licence for Ballydonagh and it first appears on the licence decision review for W0028-02. There was no obvious reference in the accompanying Inspector's Report of 12 November 2004 as to why this particular limit was imposed. This Council would contend that this limit may have been a typographical error and warrants nothing more than a minor amendment to the existing licence.

Notwithstanding the above, I would also draw your attention to the fact that Air Guidance Note AG7 "Guidance Note on Landfill Flare and Engine Management" acknowledges that monitoring emission

limit values outlined in a facilities waste licence may not be appropriate to a facility over it's lifetime. At Section 2.4 of the Note, there is provision using Site Specific Risk Assessment (SSRA) to relax licence conditions in relation to stack emissions.

This application had initially been made to Office of Environmental Enforcement (OEE) through EDEN and was subsequently referred to the Office of Climate, Licensing & Resource Use.

You will appreciate that an urgent decision on this amendment is warranted in order that Westmeath County Council can proceed with the appointment of the landfill gas utilisation contractor. If you have any queries or require any clarification please do not hesitate to contact the undersigned.

Many thanks for your assistance on the matter.

Yours Sincerely,



Ciaran Jordan, Senior Executive Engineer  
Environment Section  
Tel :044 9332177 / mob 087 2538387  
email: cjordan@westmeathcoco.ie

For distribution purposes only.  
Consent of copyright owner required for any other use.