

Ballynagran Residual Landfill
Ballynagran Landfill LTD
Coolbeg Cross
Co. Wicklow

Date: 11th November 2016

Mr. Brian Meaney
Senior Inspector
Environmental Licensing Programme
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Wexford Y35W821

Re Technical Amendment of Industrial Emissions Licence (W0165-02)

Dear Mr. Meaney,

Ballynagran Landfill Ltd requests in accordance with the provisions of Section 42B of the Waste Management Act 1996, as amended a Technical Amendment of Industrial Emissions Licence W0165-02.

The amendment is required to facilitate a temporary increase in the quantity of treated residual waste that can be accepted for disposal in 2016 by 40,000 tonnes, and a temporary increase in the amount of construction and demolition waste that can be accepted for recovery by 15,000 tonnes.

The temporary increases are required due to the sudden and unexpected cessation of waste acceptance at the Drehid Waste Management Facility (Reg No. 0201-03) on the 10th November. Waste acceptance will not resume at the facility until January 2017.

The Drehid Facility is one of three active landfills in the Eastern-Midland Waste Region, the others being the Ballynagran Landfill Ltd landfill in Wicklow and the Knockharley Landfill Ltd landfill in Meath.

The cessation of waste acceptance at Drehid means there is insufficient disposal capacity in the Region and the estimated shortfall between now and the 31st December 2016 is 120,000 tonnes. In the absence of disposal outlets in the Region, the options are to store the residual waste at the waste management facilities where it is treated; export the waste to over-seas waste to energy (WtE) plants, or provide additional short term disposal capacity in the Region.

Storage is not practical due to the lack of space at the materials recovery facilities that process the wastes and the inevitable environmental pollution and health risks associated with the decomposition of the organic fraction of the waste. Export is not an option due to a combination of a lack of contracts between Irish waste management companies and the operators of the WtE plants and the time required to arrange the necessary trans-frontier shipment documentation. Therefore, the only practical option is a temporary increase of the disposal capacity at the Ballynagran and Knockharley Landfills.

The Ballynagran Landfill has the void space (currently 88,000m³ with an additional 20,000m³ becoming available in December) and the plant and equipment (2 No. Compactors, 1 No.

Dozer, 5 No. Excavators and 3 No. Dumpers) to place, compact and cover the additional wastes in accordance with Conditions 5.5 and 5.8.

Condition 5.5.1 b) restricts the working face to an area of 625m². The acceptance of the additional wastes will require an increase in the working area to 900m² and in this regard it is noted that Condition 5.6.1 includes provision for the alteration to the size of the working area subject to the Agency's prior approval.

The waste will only be placed in landfill cells that have been designed and constructed in accordance with Conditions 3.2 and 3.12 and are provided with the leachate and landfill gas infrastructure specified in Conditions 3.14 and 3.15 respectively. The leachate management measures will comply with the requirements of Condition 5.10 and the landfill gas management measures will comply with the requirements of Condition 7.8.

To ensure the requirements of Condition 7.8 Odour Control & Monitoring, in particular Condition 7.7.7, are complied with there is a need to increase the amount of construction and demolition waste that is recovered on site by use as daily cover.

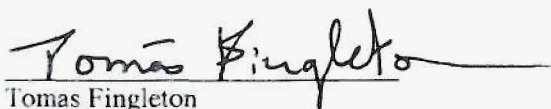
Condition 42B (c) of the Act empowers the Agency to amend a licence for the purpose of facilitating the operation of the licence and the making of the amendment does not result in the relevant requirements of section 40(4) ceasing to be satisfied.

Condition 1.8.2 allows the facility to operate between 7.00am to 7.00pm Monday to Saturday, but Condition 1.8.1 limits waste acceptance hours to between 8.00am and 6.00pm Monday to Saturday. To maximise daylight hours a temporary extension of the waste acceptance hours to 7.30am is sought.

The temporary increases will not give rise to any new emissions, will not require the deployment of any additional BAT and will not change the total permitted landfill capacity. The existing leachate management infrastructure has the capacity to accommodate the additional wastes while the landfill gas management infrastructure will be monitored, maintained and expanded as required by Condition 7.8. The acceptance of the additional wastes will not result in any of the requirements of section 40(4) (a) to (j) ceasing to be satisfied.

In relation to section 40(4) (cc), the temporary increase is consistent with the objectives of the Eastern-Midland Region Waste Plan (the Plan). Section 16.4.3 of the Plan states in relation to landfill capacity that there *'is also a need to maintain a contingency supply in response to potential situations which present a risk to the health and well-being of citizens, livestock and the environment.'* Policy objective (E.10) recognise the need for on-going disposal capacity to be available in response to events which pose a risk to the environment and/or health of humans and livestock. *The local authorities of each region will monitor available contingency capacity annually.*

It is envisaged that the additional tonnages for disposal/recovery will be deducted from the annual tonnages for 2017. Ballynagran Landfill Ltd will apply for a review of the Licence for approval to bring the 2017 disposal/recovery tonnages back to those authorised in the current licence.


Tomas Fingleton

Facility Manager
For and on behalf of Ballynagran landfill Limited