



Knockharley Landfill Ltd,  
Kentstown,  
Navan  
Co.Meath.

Date: 11<sup>th</sup> 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 W0146-02

Dear Mr. Meaney;

Knockharley 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 W0146-02.

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 80,000 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 for disposal at the Drehid Waste Management Facility (Reg No. 0201-03) on the 10<sup>th</sup> November 2016. 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 Knockharley Landfill Ltd facility in Meath and the Ballynagran Landfill Ltd facility in Wicklow.

The cessation of waste acceptance at Drehid means there is insufficient disposal capacity in the Region and the estimated shortfall between now and the 31<sup>st</sup> 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 overseas WtE plants and the time required to arrange trans-frontier shipment documentation. Therefore, the only practical option is a temporary increase in disposal capacity at the Knockharley and Ballynagran Landfills.

The Knockharley Landfill has the void space (210,000m<sup>3</sup>) and the plant and equipment (1 No. Compactor on-site and awaiting delivery of a second, 1 No. Dozer, 5 No. Excavators, 2 No. Dumpers and 1 No. roller) to place, compact and cover the additional wastes in accordance with Conditions 5.6 and 5.9.

Condition 5.6.1 b) restricts the working face to an area of 625m<sup>2</sup>. The acceptance of the additional wastes will require an increase in the working area to 900m<sup>2</sup> and, in this regard, it is noted that Condition 5.6.1 includes provision for the alteration to the size of the working area

The waste will only be placed in landfill cells that have been designed and constructed in accordance with the 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 5.11 and the landfill gas management measures will comply with the requirements of Condition 6.10.

To ensure the requirements of Condition 5.7 Daily & Intermediate Cover, in particular Condition 5.7.2, 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.

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 6.10. 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 that in relation to disposal capacity 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. Knockharley 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.

Yours Sincerely,

Thomas Finnegan  
**Facility Manager**  
**For and on behalf of** Knockharley Landfill Ltd.