



**OFFICE OF
ENVIRONMENTAL
SUSTAINABILITY**

Environmental Licensing Programme Memorandum

To: DIRECTOR

From: Brian Meaney

Date: 26 May 2017

RE: Section 98A notice by Bord na Móna in respect of Drehid Landfill, licence register number W0201-03.

Introduction

Section 98A of the EPA Act 1992 as amended requires a licensee to "give notice in writing to the Agency of any proposal to effect any alteration in the nature or functioning, or a reconstruction or extension of the installation if such alteration, reconstruction or extension would, or is likely to, change or increase emissions from the activity or cause new emissions therefrom in a manner which would have consequences for the environment."

The Agency can then form an opinion under sub-sections 2 and 3 of 98A as to whether an alteration, reconstruction or extension would increase or change emissions from the activity or cause significant new emissions therefrom or otherwise constitute a substantial change.

(Substantial change is defined in sub-section 5 as a change in the nature of functioning, or an extension, of an installation which may have significant adverse effects on human health or the environment.)

Where the Agency forms an opinion, it may, depending on the circumstances do one of the following:

- review the licence under section 90 of the Act,
- direct the licensee to apply for a new licence in substitution of an existing licence, or
- determine that no further action is necessary.

The licensee's notification and request

Pursuant to section 98A of the EPA Act 1992 as amended, Bord na Móna gave notice on 26 April 2017 (in a letter dated 24 April) of proposals to effect alterations and facility extensions to the Drehid waste management facility currently operating under IE licence register number W0201-03 and sought direction as to whether to submit an application for a licence review or a new licence.

The proposed new activities at the facility will include, in addition to all existing landfilling and other authorised waste activities:

- new non-hazardous landfill footprint of approximately 21 Ha with a proposed intake of up to 250,000 tonnes of waste per annum including incinerator bottom ash, construction and demolition waste and stabilised biowaste;
- pre-treatment of incinerator bottom ash prior to its disposal to landfill including the recovery of up to 15,000 tonnes per annum of metal from the ash;
- new hazardous landfill footprint of approximately 11 Ha with a proposed intake of up to 85,000 tonnes per annum of hazardous waste including incinerator fly ash and other residues and other hazardous wastes currently exported for disposal abroad;
- pre-treatment of hazardous incinerator fly ash and flue gas treatment residues in an ash solidification facility;
- new composting capacity at existing and proposed new composting facilities up to a total capacity of 90,000 tonnes per annum (compared to existing authorised 25,000 tonnes per annum);
- a leachate treatment facility;
- seven additional surface water attenuation lagoons;
- four additional integrated constructed wetlands; and
- a large number of associated developments the full listing of which can be seen in Bord na Móna's notice which is attached to this report.

It is apparent that an expanded licence boundary will form part of any authorisation to carry out the proposed new activities.

Recommendation

The proposed extension, alteration of the nature and scope of activities and reconstruction at the installation would, or is likely to, change or increase emissions from the licensed activity or cause significant new emissions. The proposals also constitute substantial change as defined in the Act. It is recommended that the Agency accordingly form its opinion.

Subsection 98A(3) allows the Agency to decide, having formed the opinion recommended above, whether to review the existing licence or direct the licensee to apply for a new licence in substitution of the existing licence. It is recommended that the Agency direct the licensee to apply for a new licence for the following reasons:

- the installation boundary will increase in size;
- a new class or classes of activity according to the First Schedule of the EPA Act 1992 as amended involving the treatment of hazardous waste will be introduced and sought for authorisation; and
- a new class of landfill according to the Landfill Directive, namely landfill for hazardous waste, will be introduced and sought for authorisation.

Section 98A(4) directs the Agency to inform the licensee of its decision within one month of the date of receipt of the notice.

Signed



Brian Meaney