

Knockharley Landfill Limited

Company No. 529325

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

Date: 23/2/18

Re Technical Amendment of Industrial Emissions Licence W0146-02

Dear Mr. Meaney,

Knockharley Landfill Ltd hereby 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 for Knockharley landfill.

The amendment is required to facilitate an Order made by Meath County Council under Section 56 of the Waste Management Act 1996. The Order, was made by Meath County Council to facilitate the remediation of an unauthorised landfill site known as Timoole, in the area of Rathfeigh, Co. Meath (approximately 5km from Knockharley Landfill).

It was estimated at the start of the Timoole remediation project that there would be 70,000 tonnes of waste to be excavated and that 35,000 tonnes of cover material would be required to manage the odorous waste on site at Knockharley landfill i.e. a 2:1 ratio. A Technical Amendment for this was applied for in October 2017 Change Request CR04379.

To date 52,577 tonnes of waste has been accepted into Knockharley landfill and 32,444 tonnes of cover material has been used to manage it onsite. It is expected the total tonnage on completion of the remediation will be approx. 70,000 tonnes. It is clear from the above tonnages that the original estimate of 2:1 is too low and that a ratio of 1:1 waste to cover is essential given that approx. 2000 tonnes/day (100 loads) of waste is being accepted from Timoole.

The waste from Timoole is very wet, see attached photos and videos, which was not anticipated. Additional cover material, above and beyond the expected 2:1 ratio has had to be used to dry up the waste to allow compaction to take place and to allow access for the trucks hauling the waste.

In addition to the cover material controlling odours and drying up the waste it has the added benefit of ensuring slope stability. Golders Associates Ireland, in conjunction with Knockharley landfill staff are monitoring slope stability to ensure that sufficient dry cover material is being used to stabilise the wet waste. Golders have advised that the gradients of the waste embankments are sufficient but that as much dry fines material as possible should be used to ensure continued stabilisation of the wet waste.

Additional C&D waste has had to be used to build/maintain the haul road into the active face due to the volume of trucks delivering waste from the Timoole project. Due to the softer nature of the waste underneath, the haul roads are not lasting as long as roads built on top of dry waste. The Timoole project was also stopped for a short while due to the amount of punctures being experienced by the trucks. Additional cover material had to be placed on the haul road to prevent punctures and allow the project to continue. It is expected that the need to continue to apply additional material to the haul roads will continue for the duration of the project.

For the above environmental and engineering reasons i.e. daily cover of the active face, odour control, drying the wet waste, haul road maintenance and slope stability it is considered essential to increase the rate of recovery of fines, woodchip, stone and soils to a ratio of 1:1 with the waste coming in from Timoole. All of the above are considered good operational practice and are in compliance with BAT and the Regional Waste Management Plan.

We propose that this could be accommodated by the amendment of Condition 1.19 as follows:

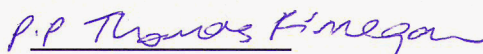
- Disposal within the void of the landfill of an estimated 70,000 tonnes of waste from the Timoole remediation project
- Acceptance of up to 70,000 tonnes of daily cover/engineering material (or a 1:1 ratio) to manage the additional waste from the Timoole remediation project.

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 acceptance of the additional waste and cover material will not give rise to any new emissions and will comply with 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.

The acceptance of the additional wastes and cover material will not result in any of the requirements of section 40(4) (a) to (j) ceasing to be satisfied.

Yours Sincerely,


Damien Holmes
Knockharley Landfill



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