

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

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.

The amendment is required to facilitate an Order made by Meath County Council under Section 56 of the Waste Management Act 1996. This Order, has been 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).

Condition 1.6 of the Licence states only waste that has been subject to pre-treatment shall be accepted for disposal at the landfill facility.

- (i) Treatment shall reflect published EPA technical guidance, as set out in Municipal Solid-Waste-Pre-treatment and residual Management, EPA 2009.

Therefore the agreement of the Agency is sought under Condition 1.6

- (ii) this condition shall not apply to
 - Inert wastes for which treatment is not technically feasible
 - Other waste for which such treatment does not contribute to the objectives of the Landfill Directive as set out in Article 1 of the Directive by reducing the quantity of the waste or the hazards to human health or the environment.

According to tender data the remediation works involve the excavation and removal of an estimated 70,000t of non-hazardous waste and impacted soils from the Timoole site. Knockharley Landfill Ltd. also understands that the project will commence in the coming weeks.

Knockharley Landfill Ltd has the void space along with the plant and equipment (2 No. Compactor on-site, 1 No. Dozer, 4 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 625m². The acceptance of the additional wastes will require an increase in the working area to 900m². The width of current Cells 15 and 16 is 60m so a working face of two runs at 30m would be more manageable and would facilitate the restrictions placed on the movement of material from the unauthorised site whilst not impacting on the regular daily landfill waste acceptance, 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 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 additional material to be used as daily cover as we have been advised by Meath County Council that the material to be excavated from this unauthorised site could be particularly odorous.

An increase in fines, woodchip, stone and soils to provide immediate cover to this material is required as the use of additional cover material has proved to be successful and is good operational practice to mitigate odours, as previously demonstrated during the last section 56 notice that was issued to Knockharley Landfill Ltd.

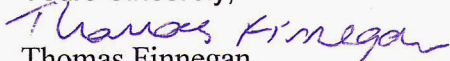
It is also requested that soils excavated during the construction phases at our facility be used in the restoration phase of the project being carried out by Meath County Council.

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 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 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. Policy Objective (F3) requires the local authorities to take measures to prevent and cease unauthorised waste activities by way of investigation, notifications, remediation requests, or legal action as appropriate.*

Yours Sincerely,



Thomas Finnegan

For and Behalf of Knockharley Landfill Ltd

Kentstown

Navan

Co.Meath