



Ballynagran Landfill Limited

Coolbeg Cross, Co. Wicklow, A67 KF53

Environmental Licensing Programme
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Wexford
Y35W821

Date: 2nd March 2020

Re Technical Amendment of Industrial Emissions Licence W0165-02

Dear Inspector,

Ballynagran Landfill Ltd requests 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 and recovery in 2020.

The temporary increase is required for 2020 due to the anticipated national deficit in disposal/recovery outlets i.e. incineration, landfill and export and the subsequent emergency which will arise for waste collectors who will not have an outlet for their waste. A national **“capacity deficit in the range of 42,000 to 73,000 tonnes for residual MSW in 2020”** has been predicted by the Regional Waste Management Offices (RWMO's) in their bulletin entitled **“Waste Treatment Capacity Analysis Q4 2019 & Projections 2020-2022”**.

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 overseas waste to energy (WtE) plants or provide additional short term disposal capacity in the Region.

Storage of the anticipated quantities of waste at year end 2020 will not be feasible 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. Therefore, the only practical option is a temporary increase in disposal capacity at Ballynagran Landfill.

In order to prevent an emergency situation from occurring in 2020 Ballynagran Landfill Ltd therefore requests, in accordance with the provisions of Section 42B of the Waste Management Act 1996 (as amended), a Technical Amendment of its 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 by 50,000 tonnes and a temporary increase in the amount of cover material which can be accepted for recovery by 15,000 tonnes. Ballynagran can easily accommodate the additional waste using the existing infrastructure, machinery on-site and operational practices.



Ballynagran Landfill Limited

Coolbeg Cross, Co. Wicklow, A67 KF53

The earlier that a technical amendment is granted the earlier additional capacity can be supplied to the market which will prevent a crisis from arising towards the end of 2020.

The temporary increase in tonnages will **only** be activated if approved by the Department of Communications, Climate Action & Environment (DCCAE) and the RWMO's in conjunction with the Environmental Protection Agency (the Agency).

Ballynagran Landfill has the void space (350,000m³) 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 5.5 and 5.8.

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 5.10 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 7.8.7, are complied with there is a need to increase the amount of 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 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 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.*



Ballynagran Landfill Limited

Coolbeg Cross, Co. Wicklow, A67 KF53

The temporary increase is also consistent with the functions of the Agency under Section 56 & 56A of the waste management act i.e. powers to take measures if "...measures are required to be taken in order to prevent or limit environmental pollution in its functional area caused, or likely to be caused, by the holding, recovery or disposal of waste, the local authority may take such steps, carry out such operations, recover or dispose of, or arrange for the recovery or disposal of, such waste or give such assistance as it considers necessary to prevent or limit such pollution...".

Yours Sincerely,

Damien Holmes
General Manager
Ballynagran Landfill Ltd.

*For inspection purposes only.
Consent of copyright owner required for any other use.*