



# Ballynagran Landfill Limited

Coolbeg Cross, Co.Wicklow A67 KF53

**DATE:** 22<sup>nd</sup> June 2020

**RE:** Application for a Technical Amendment to amend Condition 3.13.1 and to remove Zeig's lands from within the site boundary of the facility.

## **Amendment of Condition 3.13.1**

### **Condition 3.13.1 states.**

*“A Buffer Zone, in which no waste shall be landfilled, shall be provided and maintained within the facility. The Buffer Zone shall be a minimum of 100m between the landfill footprint and the facility boundary.”*

There is no legislative or EPA guidance document that requires the 100m referred to in the above condition. Any buffer zone should be site specific.

Ballynagran has operated successfully without impacting on adjoining lands inside or outside the buffer lands. Therefore, we request the at the area of the Buffer Zone should be allowed to be agreed by the Agency based on site specific conditions and environmental compliance records rather than just on an arbitrary distance.

The following wording for Condition 3.13.1 is proposed.

*“A Buffer Zone, in which no waste shall be landfilled, shall be provided and maintained within the facility. The Buffer Zone shall be a minimum of 100m between the landfill footprint and the facility boundary unless otherwise agreed by the Agency.”*

### **Removal of Zeig's lands/Alteration to the site boundary**

An Exit Audit is required to remove lands from within the site boundary. Ballynagran has liaised with both the Office of Environmental Enforcement (OEE) and Environmental Licensing Programme (ELP) sections of the EPA and it was agreed that Ballynagran would first carry out a self-audit based on the requirements of the Independent Closure Audit (ICA) usually conducted for surrender of licenses. The ICA would then be assessed by the OEE and Exit Audit recommendations would be forwarded to the ELP section for consideration as part of the Technical Amendment request to remove Zeig's lands from within the site boundary. See Independent Exit Audit attached to TA application.



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## **Conclusion**

The proposed amendment of Condition 3.13.1 and removal the Zeig's lands from within the facility boundary will not result in any increase in emissions or impact on adjoining lands. The landfill will continue to operate in accordance with its licence.

The extent of the landfill footprint remains as per the original Environmental Impact Statement and subsequent planning permission and licence.

The proposed change to the Buffer Zone will result is a minimum distance of 60m between placed waste and the facility boundary. There will be no impact on the lands arising from this change.

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