



Electronic Copy

Mr. David Naughton

On behalf of Knockharley Landfill Limited

12 August 2021

Reg. No.: W0146-04

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Knockharley Landfill Limited for an installation located at Knockharley Landfill, Knockharley, Navan, (Includes Townlands of Tuiterrath & Flemingstown), Meath, C15 FX09

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 22 October 2019.

Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with the above mentioned legislation. You are therefore requested, in accordance with the regulations, to supply the information detailed below.

1. The correspondence received on the 16 December 2019 from OCM consultants refers to a number of files to be uploaded as Unsolicited Additional Information. However, no files were uploaded or received as part of the application documentation. Submit the documents referred to in this correspondence [Regulation 9(4)(d)].
2. Attachment 6-1 Stakeholder Engagement refers to an uploaded document titled 'Project and Threshold Planning' but no document of this name appears to be uploaded. Submit the referenced document as required under section 6.3 of this attachment [Regulation 9(4)(d)].
3. Attachment 2-5-1 Technical Knowledge does not provide details of applicant technical knowledge and/or qualifications, along with that of other relevant employees. In accordance with the [licence application guidance](#), provide the following [Regulation 9(2)(h)]:
 - (1) a list of relevant individuals name, position, duties and responsibilities and experience/qualifications;

(2) additional information, including the management structure and an organisational chart.

4. Section 5 of Attachment 1-2 Non-Technical Summary identifies the proposed Classes of Activities as including 11.4(a)(i) and 11.4(a)(ii) whereas Section 4.1 of the Application Form does not include Activity Class 11.4(a)(i). Clarify if Activity Class 11.4(a)(i) is required as part of the proposed development [Regulation 9(2)(c)].
5. Confirm that Activity Class 11.6, of the First Schedule of the EPA Act as amended, is not required in relation to the proposed activities considering LoW code 16 06 01* (lead batteries) is included in the list of wastes proposed to be accepted in Section 4.3 of the Application Form. In relation to the capacity specified within Activity Class 11.6, your attention is drawn to the interpretation of capacity at the following link: [Industrial Emissions Directive FAQs | Environmental Protection Agency \(epa.ie\)](#) [Regulation 9(2)(c)].
6. It is noted that Attachment 4-7-3 contains a BAT assessment in relation to the Waste Treatment BREF document. You are required to provide an assessment of the proposed activities against the BAT conclusions contained within Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council. Complete the assessment utilising the attached spreadsheet “2018.1147.EU – Waste Treatment” [Regulation 9(2)(h)].

The CID with individual BAT may be referred to at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018D1147&from=EN> (Linked document referred to in the spreadsheet).

7. In relation to the recovery of IBA, provide an assessment against the applicable BAT conclusions for the treatment of bottom ashes from the incineration of waste contained within Commission Implementing Decision (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration. Complete the assessment utilising the attached spreadsheet “C2019.2020. – Waste Incineration” [Regulation 9(2)(h)].

The CID with individual BAT may be referred to at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019D2010&from=EN> (Linked document referred to in the spreadsheet).

8. Provide an assessment of the proposed activities against the BAT conclusions contained within the BREF for Emissions from Storage. Present the assessment utilising the tabular format provided in the licence application form for this BREF document [Regulation 9(2)(h)].
9. It is noted that Attachment 1-2 Non-Technical Summary refers to the planning permission granted for a solar farm on part of the capped landfill but the installation of the solar farm is not detailed in the proposed changes in this attachment or in the Proposed Development details of Section 1.2 of the submitted EIAR. Confirm if the installation of the solar farm will be carried out as part of the proposed development and if so, provide details of any assessments carried out in relation to the impact of the solar farm on the landfill cap, surface water drainage, landfill maintenance requirements, monitoring requirements and any other aspects of the landfill potentially impacted by the installation [Regulation 9(4)(d)].
10. Attachment 4-6-1 states that 426m³/year of 'other fuel oil' is utilised on site. Confirm the type of fuel used and details on the use of the fuel [Regulation 9(2)(f)].
11. Confirm if the liner details provided in Attachment L2 will be utilised for all landfill cells including the cells proposed for IBA and SNRHW [Regulation 9(2)(g)].

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIS where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

The requested information should be submitted to the Agency within **6 weeks** of the date of this notice, in order to allow the Agency to process and determine your application.

It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact licensing@epa.ie.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at [IE Licence application guidance | Environmental Protection Agency \(epa.ie\)](#)

Please direct any queries to licensing@epa.ie.

Yours faithfully,
Environmental Licensing Programme
Office of Environmental Sustainability
Tel: 053 – 9160600