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Environmental Licensing Programme  
Office of Environmental Sustainability

7<sup>th</sup> September 2021

Re: 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 Tuiteath & Flemingstown), Meath, C15 FX09

Dear Sir or Madam,

I refer to notice issued on 12<sup>th</sup> August 2021 in relation to the application for a licence received by the EPA on 22 October 2019.

The individual requests for information are set out below in italics followed by the applicant's response.

- 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)].*

The following documents have been uploaded

- 1-1-Knockharley-RFI-Response-No-1-Need.pdf
- 2-2-Knockharley-RFI-Response-No-2-Traffic.pdf
- 3-3-Knockharley-RFI-Response-No-3-Landscape-Visual-Impact-Main-Documents
- 4-4-RFI-Response-No-3-LVisual-Appendix-1-Photomontages-optimised
- 5-5-Volume-4-Drawings.pdf
- 6-6-4-Knockharley-RFI-No-4-Part-1-Biodiversity-optimised.pdf
- 7-7-5-Knockharley-RFI-No-4-Part-2-AA-and-NIS-optimised

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)].

Project and Threshold Planning document has been uploaded.

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.

Details of the relevant individuals are in the revised Attachment 2-5-1.

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)].

Class 11.4(a)(i) is not part of the proposed development

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)].

LoW Code 16 06 01\* refers to site vehicle batteries replaced during servicing and its inclusion in the list of wastes to be accepted was an error. For the avoidance of doubt it is not intended to accept and treat vehicle batteries.

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).

The assessment of the proposed development against the BAT conclusions for waste treatment is in the BAT Waste Treatment Assessment.

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).

The assessment of the proposed development against the BAT conclusions for treatment of bottom ashes from incineration of waste is in the BAT Incinerator Bottom Ash Assessment.

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)].*

The assessment of the proposed development against the BAT conclusions for waste storage is in the BAT Storage Assessment.

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)].*

The installation of the solar farm will not be carried out as part of the proposed development.

10. *Attachment 4-6-1 states that 426m<sup>3</sup>/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)].*

The other types of fuel include diesel used in the mobile plant and heavy fuel oil used in the gas engines. .

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)].*

The liner details provided in Attachment L2 will be used for all landfill cells.

*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 application non-technical summary has been updated to reflect the responses.

Yours Sincerely

  
Jim O' Callaghan

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