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Mr. David Naughton

On behalf of Knockharley Landfill Limited

01 November 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 Tuitearath & 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. Revised Attachment 2-5-1 Technical Knowledge submitted on 07 September 2021 does not provide details in relation to the Deputy Facility Manager or the management structure and organisation chart. In accordance with the [licence application guidance](#), provide the following [Regulation 9(2)(h)]:
  - (a) Details of the Deputy Facility Manager's name, duties and responsibilities and experience/qualifications;
  - (b) Information in relation to the management structure and an organisational chart.
  
2. It is noted from the odour impact assessment in Appendix 7.1 of the EIAR that odour emissions from landfilling activities were modelled and assessed separately from odour emissions from the biological treatment plant. In order to assess the odour impact from the proposed activities, you are required to model all potential sources of odour together within the modelled scenarios and to revise the model/report to take account of the following [Regulation 9(2)(k)]:

- (a) All additional potential odour sources including; the current leachate lagoon and the three additional proposed leachate lagoons, the landfill gas compound and the entrance and exit doors to the biological treatment plant considering the potential frequency of odour emissions during waste unloading and finished compost removal.
  - (b) Compare the results of the odour impact assessment to an odour impact criterion of  $1.5 \text{ OU}_E/\text{m}^3$  as a 98<sup>th</sup> percentile of one hour averaging periods.
  - (c) Utilise data from an inland meteorological station which may be more reflective of the location of the installation.
  - (d) Provide all required details in relation to the model as set out in section 6.12 of EPA Guidance Note (AG4) on Air Dispersion Modelling from Industrial Installations, and in particular a site plan showing buildings, sources, boundary and receptor grid and the model data inputs.
  - (e) Clarify whether the odour emission measurements, carried out in October 2010 and March 2018, are considered representative of the site taking account of seasonal variations and the years in which the monitoring was conducted.
  - (f) Confirm whether the maximum odour concentration at the outlet of the biofilter, as outlined in section 4.2.3, is based on a design which includes the operation of the scrubber.
  - (g) Clarify if the results of the year 4 and year 6 scenarios are considered worst case relative to all other future years.
3. In relation to cell covers, capping and internal road construction, clarify and/or provide information in relation to the following [Regulation 9(2)(g)]:
- (a) Application Form Attachment L9 'Landfill Controls' lists a number of wastes to be used as daily and intermediate cover and road construction, including IBA waste. Clarify the suitability of IBA as a cell cover and road construction material considering the potential for dust generation outlined in relation to IBA in Section 2.5.5.12 of Volume 2 Main EIAR.
  - (b) Provide details of the assessment criteria to be utilised to determine the suitability of IBA as a cell cover and road construction material, including how it will be demonstrated that the IBA waste is non-hazardous.
  - (c) Section 2.4.4 of Volume 2 Main EIAR states that the slope of the working face will be covered with synthetic cover sheets at the end of each working day. Provide details on the composition/nature of the cover sheets to be used.

- (d) Section 2.4.4 of Volume 2 - Main EIAR refers to temporary synthetic low-permeability covers (intermediate capping) being installed as areas of the landfill reach full height and that these practices will continue for future residual non-stabilised waste inputs. However, Section 2.2.2 of Appendix 7.1, Odour Impact Assessment, refers to enhancement of the intermediate capping system from stitched geo-multicover and recovered soils and C&D waste to hermetically sealed geo-multicovers. Clarify which intermediate capping system will be used and provide details on its composition/nature. Additionally, confirm how a hermetic seal will be achieved if applicable.
  - (e) Section 2.5.5.12 of Volume 2 - Main EIAR states that once IBA has reached its final profile, temporary covers or a permanent LLDPE liner will mitigate the risk of dust generation. Clarify what materials will be used for the temporary covers.
  - (f) Confirm at what stage will a permanent fully engineered cap be placed on IBA cells in the event the material is deemed unsuitable for recovery.
4. Section 2.18 of Volume 2 – Main EIAR states that works associated with the development of the surface water attenuation lagoon to the north of the proposed IBA facility and the realignment of the stream on the north-eastern corner of the permitted landfill development will each require a Section 50 consent from the Office of Public Works. Confirm whether each Section 50 consent has been applied for or approved [Regulation 9(3)(d)].
  5. Section 2.18 of Volume 2 – Main EIAR states that felling associated with the removal of existing forestry at the location of the proposed screening berms will require a Felling Licence from the Forestry Service. Confirm whether the Felling Licence has been applied for or approved [Regulation 9(3)(d)].
  6. Section 2.18 of Volume 2 – Main EIAR states that the acceptance and processing of residual municipal solid fines at the proposed biological treatment facility will require a 'Type 8' facility approval by the Department of Agriculture, Food and the Marine (DAFM). Confirm whether the Type 8 facility approval has been applied for or approved [Regulation 9(3)(d)].
  7. Drawing No LW14-821-01-P-0050-003 titled "Existing Forestation Proposed Felling and New Planting" shows proposed final forest planting of conifer dominant woodland (e12 and e18) on Phase 7 cells and IBA cell 29. Confirm what measures will be in place to ensure that there will be no impact to the liner and final capping of these cells [Regulation 9(2)(r)].

8. Table 2-4 of Volume 2 – Main EIAR includes Industrial Emissions Directive activity class 11.4(a)(iv) as follows [Regulation 9(2)(c)]:

*Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. 254 of 2001) apply):*

*(iv) treatment of slags and ashes;*

However, this activity class is not included in the application form or site and newspaper notices. In the event that waste IBA is not suitable for recovery and that the fate of all the material is disposal, Class 11.4(a)(iv) will be required. Confirm whether activity class 11.4(a)(iv) is to be included in the required activity classes as part of this licence review application.

9. It is noted that the biological treatment facility will be designed to accommodate storage of baled recyclables and baled MSW on the ground floor and above the compost tunnels. Provide a drawing showing the storage locations and the maximum quantity of waste to be stored in each of the storage areas [Regulation 9(2)(g)].
10. Section 2.5.5.3 of Volume 2 – Main EIAR refers to specific design and operational practices to manage safe venting of hydrogen to atmosphere. Provide details of the specific design and operational practices [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 **8 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](mailto: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](mailto:licensing@epa.ie).

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