

Electronic copy  
Office of Environmental Enforcement,

20<sup>th</sup> October 2021.

Ref: 146.04-EPA-04-21

EPA Ref: W0146-02

Dear Mr Gahan,

I refer to the acceptance of Non-Hazardous Incinerator Bottom Ash (IBA) LoW code 19 01 12 and subsequent use as intermediate daily landfill cover material. The use of IBA as intermediate daily landfill cover material was suspended by the Agency recently due to the level of contamination (namely) ferrous and non-ferrous metals contained with the IBA. Following this notification, we immediately ceased using the IBA for this purpose and have been using it on haul roads and for banks for the laying of pipework on site, as agreed.

The IBA (when containing low level amounts of contaminants) is a very useful material as intermediate daily landfill cover. To this end, Knockharley Landfill Ltd seek permission to re-commence the use of IBA for this purpose.

However, to ensure the level of contaminants is monitored, we intend on putting in place a specification of the quality of the delivered IBA.

We propose on having 3 grades of IBA.

Grade 1 – containing 0-2% by weight of contaminants – considered appropriate.

Grade 2 – containing 2-4% by weight of contaminants – warning issued to the provider.

Grade 3 - >4% by weight is deemed unsuitable for intermediate daily landfill cover material and would be notified to the provider as unsuitable and placed directly onto the landfill face. A surcharge will be applied to the supplier.

Routine inspections will be carried out on 1 in 10 loads delivered to site for classification purposes on the above grading system with records maintained.

All loads delivered will be spot checked on the landfill and those that are deemed visually contaminated will be subjected to further inspection to determine the grade that should be applied.

Routine inspections will also be carried out on the IBA supplier facility.

Kind Regards,

David Naughton.

Head of Environmental Affairs.