

Electronic Copy

Mr. David Naughton
On behalf of Knockharley Landfill Limited



10 February 2022

Reg. No.: W0146-04

Further Notice under 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 EPA's notice of 01 November 2021 requesting information in respect of your licence review application.

The Agency acknowledges your response to the requested information and notes the Technical Note provided from Olfasense UK Ltd in response to item No. 2 of the EPA's notice. However, the Agency considers the information provided in the Technical Note to be insufficient to resolve the information request.

You are therefore required to submit the outstanding information detailed below:

1. A revised odour impact assessment model/report which includes all potential sources of odour modelled together within the modelled scenarios [Regulation 9(2)(k)]. This shall include odour emissions from landfilling activities, the biological treatment plant, 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.

The assessment results shall be compared to an odour impact criterion of $1.5 \text{ OU}_E/\text{m}^3$ as a 98th percentile of one hour averaging periods.

Additionally, the Agency has the following observations in relation to the Technical Note, and matters which are required to be addressed in the context of your response to no. 1 above:

- Response Ref. 3.1: The EPA *Air Dispersion Modelling from Industrial Installations Guidance Note* (AG4, 2019) specifies an odour impact criterion of $1.5 \text{ OU}_E/\text{m}^3$ as a 98th percentile of hourly averages to be used for waste sites including landfills and non-green waste composting facilities. AG4 is the Agency's recommended guidance document for air dispersion modelling and should be used in relation to the assessment rather than the referenced Sniffer research. The Agency also considers it appropriate to model all the identified odour sources together and to compare the results to the above criterion.
- Response Ref. 3.2 Q2(a): The Agency notes that there are three new proposed leachate lagoons in addition to the existing lagoon and that the submitted Odour Impact Assessment Report states that the main activities that generate odour at landfills include emissions from leachate storage and handling. Additionally, it is not clear if olfactometry samples were used to determine no odour from the existing lagoon or to assess the odours detected from the gas compound. It is further noted that the potential for odour emissions from the biological treatment plant is not expected to be significant based on the proposed mitigation, however odour emissions from the plant have not been assessed based on the frequency and duration of the doors being open. The Agency therefore considers it appropriate to utilise the air dispersion model to determine the significance of each potential source and to assess the odour impact from all identified potential sources.
- Response Ref. 3.2 Q2(c): The Agency acknowledges the ADMLC procedure for selecting a meteorological station but considers the importance of the following AG4 guidance: *Installations located more than 10 kilometres from the coast may be more appropriately assessed with an inland station which may be further from the modelling domain than a nearby coastal station.* In this regard the Agency considers that the Dunsany or Mullingar stations may be more appropriate than Dublin Airport and that a comparison summary of the results utilising meteorological data from Dunsany or Mullingar should be included in the assessment report also.
- Response Ref. 3.4: The Agency considers the odour emission measurements from samples taken in 2010 may not be reflective due to age and given that the nature of waste has changed over the time period. AG4 guidance also recommends triplicate sampling to reduce uncertainty and to enable the identification of outliers. Accordingly, the Agency considers it appropriate to provide more representative data.
- Response Ref. 3.5: Provide further information to support the maximum odour concentration utilised from the biofilter such as manufacturer specifications etc.

The above 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.

Yours faithfully,

Environmental Licensing Programme
Office of Environmental Sustainability
Tel: 053 – 9160600