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Mr. David Naughton

On behalf of Knockharley Landfill Limited

14 June 2022

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. In relation to your correspondence, received on the 19 April 2022, please provide the following information [Regulation 9(2)(k)]:
 - a. Compare the monitoring data from the on-site meteorological station against the meteorological data from Dublin Airport and Dunsany meteorological stations. Determine, in relation to wind speed and direction, which meteorological station data is the closest comparison to the on-site monitoring data. Provide the results and conclusion of this assessment.
 - b. In the event that Dunsany meteorological station is found to be the closest comparison in the assessment above, re-run the odour impact assessment model utilising the meteorological data from Dunsany station. Include all assessment scenarios as per the Odour Impact Assessment Report in Appendix 7.1 of EIAR Volume 3 – Appendices.
 - c. As noted in the Agency's previous correspondence, dated 10 February 2022, 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. Therefore, provide updated odour emission measurements as per Table 16 and 17 of the Odour Impact Assessment Report in Appendix 7.1 of EIAR Volume 3 – Appendices, and incorporate into the appropriate model.

- d. In addition to point c above, it is noted that emissions from landfill gas utilisation, as outlined in section 1.3.2 of the Olfasense report received on the 19 April 2022, were based on 2 gas engines running rather than 4 gas engines (as outlined as running 365 days/year in Attachment 7.4.1), and were based on library data rather than olfactometry. Accordingly, amend appropriately for the correct number of gas engines and carry out direct odour measurements using olfactometry by appropriately accredited contractors.
 - e. Provide all required details in relation to the appropriate 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.
 - f. Clarify if the results of the year 4 and year 6 scenarios are considered worst case relative to all other future years.
2. In relation to Attachment 7.4.1 – Emissions to Atmosphere – Main and Fugitive Emissions, provide the following information [Regulation 9(2)(i)]:
- a. In relation to the emission point code A2-1, A2-2, A2-3 and A2-4; clarify which emission points relate to the two lead engines (capacity of 1,000 m³/hr each) and which relate to the two back up engines (capacity of 800 m³/hr each), as outlined in Section 2.2.9 of Volume 2 – Main EIAR.
 - b. In relation to the emission point code A2-5 and A2-6; clarify which enclosed flare these two emission points relate to i.e. the duty flare of 2,500 m³/hr capacity, the duty flare of 1,500 m³/hr or the back-up flare of 1,500 m³/hr, as outlined in Section 2.2.9 of Volume 2 – Main EIAR.
 - c. In relation to the emission point code A2-5 and A2-6; provide the 'Typical Days Usage/Year' for each point as required by the Attachment Table.
 - d. In relation to proposed ELVs, the volumetric flow for each main emission point is stated at 3000 m³/hr, which is higher than the capacity of each, as outlined in a. and b. above and in Section 2.2.9 of Volume 2 – Main EIAR. Clarify the reason for the increased flow and/or propose an appropriate flow for each emission point based on the capacity of each source.
 - e. Propose an appropriate ELV for sulphur dioxide for each main emission point.
3. In relation to Attachment 7.4.2 – Emissions to Atmosphere – Minor and Potential Emissions, provide the following information [Regulation 9(2)(i)]:
- a. In relation to the emission point code A3-1; clarify which enclosed flare the emission point relates to i.e. the duty flare of 2,500 m³/hr capacity, the duty flare of 1,500

m³/hr or the back-up flare of 1,500 m³/hr, as outlined in Section 2.2.9 of Volume 2 – Main EIAR.

- b. Provide the Typical Days Usage/Year for the emission point code A3-1 and A3-2.
 - c. Provide the Easting and Northing Six Digit GPS Irish National Grid References for emission point code A3-2.
 - d. Complete the 'Emission Details' for emission point A3-1 and A3-2 as required by the Attachment Table.
 - e. It is noted that the flare associated with A3-1, can not be used in conjunction with the landfill gas engines, however, clarify why emission point A3-1 has been regarded as a minor emission point, taking account of the guidance in relation to determining main and minor emission points and in the event that gas utilisation is no longer viable or is off-line. The Agency Guidance is available at the following link: <https://www.epa.ie/publications/licensing--permitting/waste/Licence-Application-Form-Guidance---Version-2.1.pdf>
 - f. Clarify why emission point A3-2 has been regarded as a minor emission point rather than a main emission point, taking account of the above guidance in relation to determining main and minor emission points and its use in the management of landfill gas odours currently and in the future.
 - g. Section 2.7.2.4 of Volume 2 – Main EIAR notes that all leachate tanks and exhaust from vacuum tankers will have dedicated venting with carbon filters to facilitate passive or pumped venting of gases which may be dissolved in leachate. Update Attachment 7.4.2 where appropriate for any onsite leachate storage tanks that may provide this emission source.
4. Provide the thermal input capacity (MW) related to all four gas utilisation engines and all four gas flares [Regulation 9(2)(g)].
 5. In relation to the air dispersion model for emissions from landfill gas flares and utilisation engines, please provide the following information [Regulation 9(2)(k)]:
 - a. The volumetric flow inputs utilised in the model appear to be lower than the capacity flows of the engines and gas flares, listed in Section 7.4.2.2 of Volume 2 – Main EIAR, and lower than the proposed volumetric flows, in Attachment 7.4.1 – Emissions to Atmosphere – Main and Fugitive Emissions. Confirm the correct volumetric flows to be utilised in the air dispersion model.
 - b. Clarify why Flare 4 (capacity of 500m³/hr) was not included as a source in the model inputs, as listed in Table 7-13 of Section 7.4.2.2 of Volume 2 – Main EIAR.
 - c. Update the air dispersion model in relation to point a. and b. above, utilising more recent modelling data than the 2017 stack testing regime. Utilise also, the meteorological data from Dunsany Meteorological Station if required pending the outcome of the assessment in point 1.a above.
 - d. In the event that all gas utilisation engines are off-line, confirm what gas flares will

operate in a worst-case scenario and assess the impact utilising the air dispersion model.

- e. Provide all required details in relation to the appropriate 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 and include a copy of the Air Scientific Air Emissions Compliance Monitoring Emissions Report in an Appendix to the report.
6. Clarify what potential treatment will be carried out on the leachate as noted in Section 2.7.2.1 of Volume 2 – Main EIAR and confirm that any treated material will continue to be tankered off-site for further recovery or disposal [Regulation 9(2)(i)].
 7. Confirm if it is intended to proceed with the contingency storage of baled recyclables and baled MSW in the proposed development now that the biological treatment plant will no longer proceed [Regulation 9(2)(i)].
 8. Provide a copy of the planning permission, and any associated files, relating to the installation and operation of the gas utilisation plant – planning reference NA70015 from Meath County Council [Regulation 9(2)(e)].
 9. In relation Attachment 7.7 – Discharges to Storm Water, provide the Easting and Northing grid reference details for storm water discharge point SW10, if now determined [Regulation 9(2)(i)].

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.

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