



Electronic Copy

Mr. David Naughton

On behalf of Knockharley Landfill Limited

20 December 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 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. The Agency acknowledges the drawings for the “Existing Site Drains” and “Proposed Land Drains After Construction” submitted on 30 August 2022. However, the drawings are unclear, and both exclude the southern boundary and existing surface water lagoon. Accordingly, please resubmit the drawings ensuring the following are clearly provided [Regulation 9(2)(i)]:
  - a. The overall site showing the red line boundary and the relevant streams outside the site to which the land drains enter.
  - b. The existing and proposed drains within the site and where they either enter the surface water lagoon or cross the red line boundary and enter the relevant streams outside the site.
  - c. Information relating to power lines, gas mains etc. should be removed from the drawings to ensure they are clear.
2. The Agency notes your correspondence dated 26 October 2022 in relation to the request for a copy of planning permission NA70015 and any associated files. However, as planning permission NA70015 directly relates to the principal industrial emissions activity, you are reminded to provide the information required as soon as possible

[Regulation 9(2)(e)].

3. Taking account of the information provided in correspondence on 26 October and the air dispersion model, clarify or provide information relating to the emission points for the gas utilisation engines and gas flares as follows [Regulation 9(2)(i)]:
  - a. Clarify that the table below now reflects the details of the air emission points correctly. In the event of any errors, reproduce the table with amended details and add additional rows where required. Note: any omitted emission point would not be permitted to operate.
  - b. Provide the co-ordinates for A2-1 and A2-2 as the co-ordinates for the other referenced points have been amended in the correspondence.
  - c. Provide typical days usage/yr for A2-1 and A2-2.

Emission Point Code	Site Ref.	Easting	Northing	Typical Days Usage/ Yr	Source of waste gases	Capacity (m <sup>3</sup> /hr)	Thermal Input Capacity (MW)
A2-1 (main)	KH01				Back-up gas engine	800	1.4
A2-2 (main)	KH02				Back-up gas engine	800	1.4
A2-3 (S3) (main)	KH03	297598.45	266906.05	365	Lead gas engine	675	1.06
A2-4 (S4) (main)	KH04	297604.46	266906.97	365	Lead gas engine	675	1.06
A2-5 (S1) (main)	F1 (enclosed flare)	297577.29	266895.35	14	Flare – during engine shutdown/ maintenance	2,500	
A2-6 (S2) (main)	F2 (enclosed flare)	297571.48	266909.43	365	Flare – back-up for burning gas unsuitable for engines	1,500	
A3-2 (minor)	F3 (open flare)	N/A	N/A	<7	Flare – mobile unit in event of repair	500	

4. In relation to the Olfasense air dispersion model, clarify or provide the following information [Regulation 9(2)(k)]:
  - a. Provide a copy of the Air Scientific Air Emissions Monitoring Reports referenced on pg. 7 of the report.

- b. Confirm the flow rates are correct for Flare 2 in Table 4 and for Flare 1 and 2 in Table 6 of the report.
  - c. In accordance with EPA Air Guidance Document AG4, assess the impact for the maximum volume flow rate (i.e. 3000m<sup>3</sup>/hr as proposed ELV), as the current assessment relates to normal operational conditions only.
5. Provide a copy of the information submitted to An Bord Pleanála as required under Condition 4(f) of the planning permission order ABP-303211-18 [Regulation 9(2)(i)].
  6. The EIA assesses the impacts related to recovery and disposal options for IBA, however taking account of the fact that IBA will now only be stored for recovery, with a planning permission for storage not to exceed 5years (unless otherwise agreed with the planning authority), provide additional information related to the likely significant effects of the removal of all of the IBA material from the installation on the environment [Regulation 9(2)(k)].

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 **6 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