

Attachment-1-1-Reasons for Applying for a Licence Review

Pursuant to Section 98A of the *Environmental Protection Agency Act 1992*, as amended, Bord na Móna Public Limited Company (BnM), notified the Agency of proposals to effect alterations/facility extensions to the Drehid Waste Management Facility (WMF) located at Killinagh Upper, Carbury, Co. Kildare operating in accordance with Industrial Emissions (IE) Licence Reg. No. W0201-03.

TOBIN on behalf of BnM, prepared a planning application for the further development of the Drehid WMF as discussed at our pre-application meeting with the Agency on 09 March 2022. The proposed development works will comprise:

- A. Increase in acceptance of non-hazardous household, commercial & industrial and construction & demolition (C&D) waste at the existing landfill from the currently permitted disposal quantity of 120,000 TPA to 250,000 TPA until the permitted void space in the existing landfill is filled and no later than the currently permitted end date of 2028;
- B. Development of extended landfill footprint of approximately 35.75 ha to accommodate the landfilling of 250,000 TPA of non-hazardous household, commercial & industrial and C&D waste for a period of 25 years to commence once the existing landfill void space is filled.
- C. Provision, as part of the extended landfill infrastructure, for 30,000 TPA of contingency disposal capacity for non-hazardous waste, to be activated by the Planning Authority only as an emergency measure, for a period of 25 years;
- D. Development of a new Processing Facility for the recovery of 70,000 TPA of inert soil & stones and C&D waste (rubble) and use of same for engineering and construction purposes within the site, including as engineering material in the landfill;
- E. Increase in acceptance of waste at the existing Composting Facility from 25,000 TPA to 35,000 TPA and removal of the restriction on the operating life of the Composting Facility contained in Condition 2(2) of ABP Ref. No. PL.09.212059;
- F. Extension to, and reconfiguration of, the existing Composting Facility to provide for a new Municipal Solid Waste (MSW) Processing and Composting Facility with an additional capacity of 55,000 TPA (giving a combined total for the MSW Processing and Composting Facility of 90,000 TPA), allowing for the combined facility to accept both MSW and other organic wastes;
- G. Construction of a new odour abatement system at the existing Composting Facility including two emissions stacks to a height of 17 m above ground level;
- H. Construction of a new odour abatement system as part of the new MSW Processing and Composting Facility including two emissions stacks to a height of 17 m above ground level;
- I. Development of a new Maintenance Building, with staff welfare facility, office, storage and a laboratory;
- J. Installation of a new bunded fuel storage area, to the rear of the new Processing Facility for the recovery of soil & stones and C&D waste (rubble);
- K. Construction of two new permanent surface water lagoons and one new construction stage surface water lagoon;
- L. Construction of a new integrated constructed wetland (ICW) area comprising five ponds;
- M. Car-parking provision for operational staff;
- N. Landscaping and screening berms; and
- O. All associated infrastructure and utility works necessary to facilitate the proposed development and the restoration of the facility following the cessation of waste acceptance.

The proposed development comprises a continuation of the existing activities carried out at the Drehid WMF through the provision of additional landfill infrastructure and additional compost facility throughput, with no proposed changes in the nature and types of waste to be accepted. The proposed development will comprise an extension of the existing landfill infrastructure at the facility and an intensification of waste acceptance at the existing compost plant.

The development will take place on BnM lands comprising a total area of c. 2,543 hectares (ha) and will be located within and adjacent to the existing Drehid WMF utilising the same private access road from the R403. The existing WMF, licensed under W0201-03 has an installation boundary area of approx. 179 ha. The proposed development will result in an increase in the installation boundary to approx. 264 ha.

Sub-sections 2 and 3 of Section 98A of the *EPA Act 1992*, as amended, allow the Agency to form an opinion as to whether an alteration, reconstruction or extension would increase or change emissions from the activity or cause significant new emissions or otherwise constitute a 'substantial change'.

Based on the details supplied in a letter to the Agency seeking clarification on the application required dated 31 March 2022 and the discussion at the pre-application meeting held on 09 March 2022, the Agency confirmed that BnM will require a review of their existing licence Reg No W0201-03 for the proposed development.