J Johnson.

Our Ref: PL.16.207212
P.A. Reg. Ref: 03/3343

An Bord Pleanála

Environmental Protection Agency
P.O. Box 3000
Public Office Headquarters
Johnstown Castle Estate
Co. Wexford.

23rd July 2004

Appeal Re: Construct gas terminal for the reception and separation of gas from the Corrib gas field and for a peat deposition site.
Bellagelly South, Srahmore, Attavally, Bangor Erris, Co. Mayo

Request for Observations

Dear Sirs,

I have been asked by An Bord Pleanála to refer to the above-mentioned appeal made to the Board under the Planning and Development Acts, 2000 to 2002.

The Board understands that the proposed development comprises an activity or is for the purposes of an activity for which an IPPC licence under the Environmental Protection Agency Acts, 1992 and 2003 and a waste licence under the Waste Management Acts, 1996 to 2001 will be required.

Outline of Proposed Development

There are two distinct elements to this proposal, namely:

- Development of a gas terminal at a site adjacent to Bellanaboy Bridge, Bellagelly South, Co. Mayo.
- Peat deposition site at Srahmore, Bangor Erris, Co. Mayo.

Bellanaboy Development

The Bellanaboy site is stated to have an area of 160 hectares and was previously a peatland experimentation station. The proposed terminal footprint is 13 hectares (approx.) and an additional 1 hectare is proposed for temporary construction facilities.

The proposed terminal consists of a series of buildings and other structures to be constructed on a platform; it would have its main access from the R 3 14 regional route. In order to create the platform for the terminal, significant excavation would be required. In total up to 650,000m^3 of peat, rock and mineral soils would be excavated.

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The peat, estimated at approximately 450,000m^3 would be transported 11km by road (L1204) to a separate Bord Na Móna deposition site at Srahmore, and 200,000m^3 of mineral soils and rock would be reused as fill material on the terminal site. A maximum 7 metres of fill may be required in the SW corner of the platform. Maximum excavation of up to 10 metres would be in the NE corner.

The site is on the southern flank of a gently sloping hillock that peaks at 45m AOD (Malin). Existing ground levels are stated to vary from 43metres AOD in the NE of the terminal area to 30 metres AOD in the SW. The site slope is stated to be 1.5°. The terminal platform is proposed at 33.4m AOD (Malin). The blanket bog on the site is stated to vary in thickness from 2.2 metres in the NE to 3.6 metres in the SW. This is underlain by a clay layer (0.2 metres in the NE thickening to 2.2 metres in the SW), and a sand layer. The underlying rock is micaceous schist. The depth to bedrock varies from 3 metres (approx.) near the top of the hill to greater than 9 metres along the south side of the terminal. Generally, permeability of the various strata is stated to be very low, with peat values 10^{-8} to 10^{-9}.

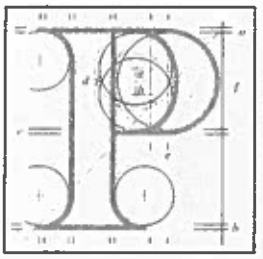
The excavated peat for export off the site is to be placed in windrows on a mineral soil foundation for 8 days prior to transportation. It is stated that windrowing may reduce the water content of the peat by up to 10%. It is proposed that a Bord Na Móna representative would be present to monitor loading operations and ensure the suitability of the site.

Control of the surface and ground waters is likely to play a key role in the successful execution of earthworks. This is because of a near surface water table in the peat and the potentially saturated (or near saturated) condition of the underlying mineral soils and bedrock. The bedrock aquifer is stated to be generally poor in terms of groundwater resources.

Excavation would commence in the north-eastern corner of the site and progress westwards. During construction storm water would be collected in sumps in the terminal area before pumping to field drains to the west of the excavation face and the fire break ditch to the south of the terminal. Ditches containing construction runoff would be diverted to settlement ponds to remove suspended solids. Roads would be drained by open channels and then to settlement ponds. During the permanent phase there would be cut or embankment slopes surrounding the majority of the terminal footprint. Drainage would be along the perimeter of the terminal with 8 connection points.

A two-stage approach is proposed for groundwater drainage – a temporary construction-dewatering scheme to be replaced by permanent groundwater control drainage. Initially two lines of dewatering (vacuum) wells would be installed as follows:

- One extending into the NE corner of the site. These walls are designed to cut off water draining onto the site from bedrock from the north of the site – the main entrance of groundwater entering the site.



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- Second line along the SW half of the site along a zone where bedrock groundwater levels are above rock level and close to the present ground surface.

A permanent groundwater drainage system is proposed around the perimeter of the platform to attract the preferential flow. A separate groundwater drain is to be installed at the base of the fill along the southern edge of the terminal site.

Srahmore Development

Up to 450,000m^3 of peat excavated from the terminal footprint of the Bellanaboy site is to be transported 11km by road to a cutover peatland site at Srahmore. At a reception area on the deposition site the peat would be transferred to low ground-bearing pressure tractors/trailers. The trailers would haul the peat via internal haulage roads to the peat deposition area where it would be placed and graded to provide for falls towards existing and new drainage ditches. It is proposed to deposit 4,000m^3 of peat daily over a period of 6 months (approx.), which may be spread over two seasons.

The site comprises cutover peatland in the Oweninny Bog Complex. The area proposed for deposition is described as a low-lying saucer shaped depression surrounded by perimeter banks. The site slopes at 1.8° from east to west falling from 20.5 metres AOD to 14 metres. Deposition is proposed in an area of 63 hectares approximately.

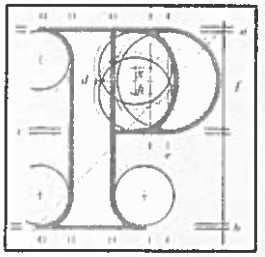
The proposed peat deposition area is within the catchment of the Owenmore River, approximately 3 km from the discharge point of the watercourse at Tullaghan Bay.

In order to provide for the reception of material and the spreading of the peat, it is proposed to modify the existing drainage system. At present there are two catchment areas involved. From the proposed reception area and part of the proposed deposition area, surface water flows through a series of settlement ponds before it enters the Munhin River. Drainage from the remainder of the deposition area currently goes through settlement pond treatment just north of the Bangor to Geesala road (L1206) before entering the Owenmore River. The proposed final drainage system would convey water to the Munhin River via two proposed settlement ponds.

Receiving Environment

There are designated conservation areas within 10 km of the Bellanaboy site as follows:

- Glenamoy Bog Complex – cSAC 500. This includes Sruwaddacon Bay (SPA) (2 kilometres away)
- Carrowmore Lake Complex – cSAC 476. (1.5 kilometres away)



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- Pollatomish Bog – pNHA 1548. (1.75 kilometres away)
- Slieve Fyagh Bog – cSAC 542. (2 kilometres away)
- Broadhaven Bay – cSAC 472. (8 kilometres away.)

There are two candidate SAC's within 1 kilometre (approx.) of the Srahmore site, namely Carrowmore Lake Complex and Owenduff/Nephin Complex.

Carrowmore Lake and the Owenmore River are significant salmon fisheries, and the Munhin serves as an important connection between the two. Tributaries feeding into Sruwaddacon Bay and Carrowmore Lake are small spawning and nursery streams, probably mostly for sea trout.

Marine waters of the Mullet Peninsula and in the vicinity of Broadhaven Bay are important in terms of fisheries and marine mammals.

Carrowmore Lake provides the drinking water supply for this part of County Mayo.

Drainage from the proposed terminal site at Bellanaboy Bridge would be to the south west, to the Bellnaboy River and Carrowmore Lake. The proposed peat deposition site at Srahmore is within the Owenmore River catchment, at its nearest point the watercourse flows within approximately 140 metres of the edge of the deposition site. The peat deposition site is located in the lower catchment zone of the river, approximately 3 kilometres from the discharge point at Tullaghan Bay. The Munhin River is a tributary of the Owenmore; the confluence is approximately 1.2 kilometres to the west of the proposed deposition area. The Munhin is approximately 750 metres from the peat deposition area at the nearest point. The main drain from the deposition site discharges to the Munhin River.

It is stated that IPC Licence No. 505 relates to the Bord Na Móna lands at Oweninny Group.

In accordance with section 98(1B)(a) of the Environmental Protection Agency Act, 1992, as amended, and section 54(3B)(a) of the Waste Management Act, 1996 as amended, you are requested to make, within 28 days beginning on the date of this notice, observations to the Board in relation to:

1. The general suitability of the Bellanaboy Bridge site for the proposed construction works and the operation of the proposed gas terminal having regard to the nature and extent of the proposal, the characteristics of the receiving environment and the Agency's potential to control emissions through an IPPC Licence during the operational phase.

2. The general suitability of the proposed Srahmore site for the deposition of 450,000m^3 of peat from the terminal site having regard to the nature and extent of the proposal, the characteristics of the receiving environment, and the Agency's potential to control emissions through a Waste Licence.

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It is stated in the application that an IPPC Licence will be sought for the operational phase of the proposed terminal at the Bellanaboy Bridge site, and that a Waste License will be sought in relation to the deposition of peat at the Srahmore site.

Any observations in response to this request should be received by the Board not later than 5.30 p.m. on **19th August, 2004**. The Board will have regard to the observations, if any, received from the Agency within the period specified.

The Board fully understands that, in accordance with section 98(1F) of the Environmental Protection Act, 1992, as amended, and section 54(3F) of the Waste Management Act, 1996, as amended, the making of observations by the Agency will not prejudice any other functions of the Agency under those Acts.

In accordance with section 98(1C) of the Environmental Protection Act, 1992, as amended, and section 54(3C) of the Waste Management Act, 1996, as amended, the Board may at any time after the expiration of the period specified above, make its decision on the appeal.

You will be notified of the Board's decision as soon as it is made.

Please quote the above appeal reference number in any further correspondence.

Yours faithfully,

Kieran Somers

Kieran Somers
Executive Officer
Direct Line: 01-8737159

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