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BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED

Noeleen Keavey
Programme Officer
Office of Licensing & Guidance
EPA

2nd August 2006

ENVIRONMENTAL PROTECTION
AGENCY
04 AUG 2006

Our Ref: Ash071/EPA49-2
Your Ref: W0049-02

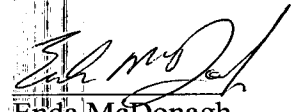
Re. Objection to Conditions of the Proposed Decision of
Waste Licence W0049-02 by Bord na Mona Energy Ltd,
Leabeg, Tullamore, Co Offaly

Dear Ms. Keavey

Please find attached a submission objecting to certain conditions of the
Proposed Licence W0049-02, outlining the reasons and grounds for objections. Also
attached is the payment of a fee of €500, as required under Article 42.

Consent of copyright owner required for any other use.

Yours sincerely



Enda McDonagh
Head of Environmental Engineering.
Bord na Mona Energy Ltd.

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Proposed Decision of WL W0049-02

The Ash Repository at Clonbullogue is currently taking ash from peat burning at Edenderry Power Ltd, and there are no immediate plans for the co-fuelling of peat and Category 3 meat and bone meal at Edenderry Power Ltd at the present time.

Therefore, there are a number of conditions that Bord na Mona Energy Ltd would like to have changed to reflect the current operations at the site, which has operated under WL W0049-01 for the past six years.

Introduction.

The introduction should reflect the current waste being disposed of at the site i.e. bottom and fly ash from fuelling of peat. It should therefore read as follows:

“The waste consists of bottom and fly ash from the **fuelling of peat and/or the co-fuelling of peat, biomass and Category 3 meat and bone meal.**”

Condition 1.2 & Schedule A.2 Waste Acceptance (note 3)

Based on request for a change to the Introduction above and for the same reasons, this should be worded as follows:

“The facility is allowed to only accept ash from **fuelling of peat and/or co-fuelling of peat, biomass and/or Category 3 meat and bone meal from Edenderry Power Limited (reg. No 654) for disposal at the landfill.**”

Condition 1.5.3

Ash waste was permitted to be accepted at Clonbullogue during Public Holidays under the previous licence W0049-01. The ash storage facility at Edenderry Power Ltd does not have the capacity for 48 hour storage. It is therefore requested that this condition be removed from W0049-02.

Condition 3.3

Permission for depositing peat ash in Cell No 3. has already given by the EPA, ref. 49-1/AK22DM{Aug'05} Mr Damien Masterson. It is therefore requested that this condition be removed.

Condition 10.3

The current mix used for the final capping is approx. 80:20 Peat: Mineral Soil. This has proved successful in providing a good soil mix for seeding and revegetation (see attached report submitted as part of W0049-01 AER 2005). It is therefore requested that this condition be changed to specify an 80:20 Peat: Mineral Soil mix.

Condition 6.17 & Schedule C5

There is only one noise sensitive location associated with the Ash Repository at N5. Due to the remoteness of the site, Noise levels have not been an issue and the new ash deposition method currently in place has resulted in a reduction of noise levels. It is therefore requested that Condition 6.17 be modified to read:

“The licensee shall carry out a noise survey at any noise sensitive locations identified at the site”

Schedule C5 should also be changed to read N5 only.

Conditions 2.2.1, 2.2.2, 6.1, 6.7, 8.1.5, 10.7, & 12.2.2.

As it is not planned to incinerate MBM at Edenderry Power Ltd for the immediate future, if ever, it will not be possible to prepare and submit an updated EMS, Leachate Monitoring Programme, Groundwater monitoring trigger levels, updated procedures, CRAMP or ELRA relating to the deposition of MBM ash, as required by the conditions above, within the time period specified.

It is therefore requested that the requirement to submit these reports/plans within 3, 6 & 12 months of grant of licence, be replaced by a requirement to **submit within a certain period prior to acceptance of MBM ash.**

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3.3 Restoration of Completed Cells/Phases

The capping of cell 1 is complete. The capping of cell two was also started and an area approximately one quarter of the cell size is now capped and seeded. An ecological survey was carried out by Bord na Mona's land development manager, the findings of which are outlined below.

Assessment of vegetation cover on capped cell

The completed cell was covered over with a layer of peat / subsoil on which it is intended to establish a permanent and stable vegetation cover. These soils were seeded in with a ryegrass and white clover seed mix in April 2004. I carried out a survey of the vegetative cover that had established there by late autumn 2004. There was an overall cover of vegetation in the region of 70% to 80% of the seed mix established along with a good range of weed species. Vegetation cover was good on the crests of both hills and in the hollows between them but was poorer on the south to south east slopes of both hills. This is probably due to wind-blow and will require reseeded in 2005. This time I would recommend that a seed mix containing a mixture of coltsfoot and timothy grasses be used as these are much more resilient grasses and if they are established there, they will persist better under the tougher conditions. The area should be rolled with a land roller in order to stabilise the soil cover. The area was not fertilized in 2004 and this should be corrected by applying 3 cwt of 10:10:20 on the overall area in spring 2005.

There is also evidence of birch seedlings germinating and establishing in particular on the south-western side of the covering and these seeds are being blown in from the surrounding birch trees there. Also some furze seedlings are establishing and some soft rush. These would be very suitable, as they would provide cover from the wind. There is evidence of bramble and bracken seedlings establishing also.

Overall I would say that there is a good ground cover on the site with a fairly stable surface. It can be improved on by carrying out the measures recommended above and by next year there should be a ground cover over the whole site.

Plants found on the area

Ryegrass	White clover	Nettle	Cocksfoot grass
Creeping thistle	Ox-eye daisy	Soft rush	Dock
Groundsel	Chickweed	Dandeloin	Rocket
Furze	Redshank	Plantain	Catsear
Mint	Marsh thistle	Bent grass	Birch
Sheperds purse	Dead nettle	Sorrell	Bracken

Update report for ash site autumn 2005

I carried out a new inspection of this site in late autumn 2005 and I confirm that the vegetation cover on both cells has progressed satisfactorily from 2004. There is close to a 100% vegetation cover on most of the site except for a temporary machine pass through the area. The grass sward is very dense in most places and on approximately 20% of the area there is a very dense and dominant stand of white clover. These grasses and clovers are now in a stable state and should persist and stabilize further and will not need intensive management from now on. There is a good population of soft rush establishing on the grassland areas also and this will benefit the stabilization of the site also. Whenever fertilizer is applied elsewhere on new areas of the site then these two

cells should also receive a light application of 1 cwt of 10;10;20. /acre. The site still has a good population of annual and biannual weeds as listed in the previous report. The scrub vegetation of birch and willow is establishing well especially on the edges of the cells and more furze is also establishing on the site in a random pattern and does not pose any problems at present.

A new area of cell has now also being sealed and covered with topsoil and grassed down this autumn. There is a good stand of grass seedlings established and this area should be fertilized and rolled this coming spring and this surface should stabilize well this summer.

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Obj (1)

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Amount of euros in words, cents as in figures




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For and on behalf of
BORD NA MÓNA ENERGY LIMITED


B. McGee

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