

APPENDIX 11.1
Corrective Actions
Waste Licence Compliance

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BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED

Leabeg, Tullamore, Co Offaly, Ireland

Environmental Corrective/Preventative Action Report Form (EPF 2.1)

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|--|---|-------------------------------|-----------|------------|--|
| Reference Number | SR-CA/002 | Date | 06/05/05 | Initiator: | Enda McDonagh, Bord na Mona Energy Ltd |
| Nature of non-compliance? | Actual / Potential | Description of non-compliance | | | |
| Exceedance in the Emission Limit Value (ELV) associated with the Bergerhoff dust gauge at DM-02 located, at the entrance to the site (see attached map). A dust level of 422 mg/m ² /day was recorded at DM-02 for the period 06/04/05 to 03/05/05, which is above the ELV of 350 mg/m ² /day. | | | | | |
| Bodies Informed, Date and Details: | None. | | | | |
| Identified as a Result of: | Dust deposition results from a Bergerhoff dust gauge at DM-02. | | | | |
| Identified by: | Enda McDonagh, Bord na Mona Energy Ltd | Date of Identification: | 11 /05/05 | | |
| Action Plan: | <p>As can be noted from the attached spreadsheet, peat deposition only occurred on 6 days during the period in question, during the start -up period. The volumes of peat deposited represented 40% of what will normally be deposited once the facility is up to full capacity. During this period, road works were on-going on the Belmullet to Bangor road, just outside the main entrance, approximately 15 – 20 metres north of the dust gauge, as was the transportation of large volumes of road materials from a local quarry for the improvement works on the Bellanboy Bridge – Srahmore haul route. Dust suppression was also utilised during 2 of the 6 days in operation, using a water tanker and tractor for wetting the entrance road, reception area and haul roads. The Dust Handling Procedure (DHP) is also in operation at the site and has been communicated to all personnel as part of the training program.</p> <p>The dust bottle, when it was changed, also contained traces of organic debris, which would have added to the sample dry weight. A new bottle was placed at the gauge on the 03/05/05, and is due for changing on the 30/05/05. Peat deposition has ceased since 25/04/05 and is due to recommence on Tuesday next 17/05/05, which will have peat deposition in operation for 50% of the current dust deposition bottle. This should provide a clearer indication of whether the high dust level from the previous sample was due to a combination of the 6 days in operation and the road improvement works. Based on the outcome of these results this corrective action will be extended or closed off.</p> | | | | |
| Responsibility: | Enda McDonagh, Bord na Mona Energy Ltd | | | | |
| Target Date for Completion: | 05/06/05 | Actual Date of Completion: | / / | | |
| Closed by (Signature and Title): | | | | Date: | / / |

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Leabeg, Tullamore, Co Offaly, Ireland

Environmental Corrective/Preventative Action Report Form (EPF 2.1)

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|--|---|-------------------------------|----------|-------------------------|--|
| Reference Number | SR-CA/004 | Date | 03/06/05 | Initiator: | Enda McDonagh, Bord na Mona Energy Ltd |
| Nature of non-compliance? | Actual / Potential | Description of non-compliance | | | |
| <p>Exceedance in the Emission Limit Value (ELV) associated with the Bergerhoff dust gauge at DM-03 & DM-04 (see attached map). Dust levels of 894 & 3151 mg/m²/day were recorded at DM-03& 04 for the period 03/05/05 to 30/05/05, which is above the ELV of 350 mg/m²/day. These dust gauges are located at the southern end of the site, beside the L1206 (Bangor to Gweesala). The gauges were originally located here to cover any dust blow from the southern end of the site towards Bangor (DM-03) and south of the L1206 (DM-04)</p> | | | | | |
| Bodies Informed, Date and Details: | None | | | | |
| Identified as a Result of: | Monthly bergerhoff dust deposition results. | | | | |
| Identified by: | Enda McDonagh, Bord na Mona Energy Ltd | | | Date of Identification: | 01/06/05 |
| Action Plan: | <p>Other than the high reading from last month at DM-02 and these high results, the dust deposition rates are on average, 56 mg/m²/day. Generally speaking, the prevailing winds at the site are from a south westerly direction, and these gauges are therefore upwind. During this period, there was rainfall on 21 of the 28 days, with an average of 2.5 mm of rain on these 21 days. There were no operations in the vicinity of these two gauges. Dust suppression also occurred on a number of occasions (see attached). In addition there were no bird perch rails attached to the gauges, which protect the dust bottles from bird droppings. Evidence of bird droppings were noted at DM-03 (894 mg/m²/day) so the gauges are currently being fitted with these protection measures. There are no residential dwellings adjacent to the southern boundary of the site on the Bangor to Gweesala rd. Due to the proximity of these two gauges to the main road, there is also the possibility of tampering with the bottles. During peat operations in Oweninny and the midlands, since IPC Licencing, no dust gauges have ever produced levels as high as 3151 mg/m²/day. This location will be monitored closely over the next sampling period, and further corrective action undertaken should levels continue to be high.</p> | | | | |
| Responsibility: | Enda McDonagh, Bord na Mona Energy Ltd | | | | |
| Target Date for Completion: | 14/06/05 | Actual Date of Completion: | | | |
| Closed by (Signature and Title): | | | | Date: | 08/06/05 |

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Environmental Corrective/Preventative Action Report Form (EPF 2.1)

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|--|---|-------------------------------|----------|------------|--|
| Reference Number | SR-CA/006 | Date | 06/07/05 | Initiator: | Enda McDonagh, Bord na Mona Energy Ltd |
| Nature of non-compliance? | Actual / Potential | Description of non-compliance | | | |
| <p>Exceedance in the Emission Limit Value (ELV) associated with the Bergerhoff dust gauge at DM-03 (see attached map). Dust levels of 1181 mg/m²/day were recorded at DM-03 for the period 30/05/05 to 27/06/05, which is above the ELV of 350 mg/m²/day.</p> <p>The dust gauge is located at the southern end of the site, beside the L1206 (Bangor to Gweesala). This gauge is located here to cover any dust blow from the southern end of the site towards Bangor (DM-03).</p> | | | | | |
| Bodies Informed, Date and Details: | None | | | | |
| Identified as a Result of: | Monthly bergerhoff dust deposition results. | | | | |
| Identified by: | Enda McDonagh, Bord na Mona Energy Ltd | Date of Identification: | 05/07/05 | | |
| Action Plan: | <p>As was outlined in SR-CA004, the dust gauges did not have any bird protection measures in place in the form of the perches. These have since been installed on all dust gauges on the facility. They were installed on the 10/06/05, which was 10 days into that 28 day monitoring period and maybe a contributing factor to the high result. No peat deposition occurred in the bay adjacent to that dust gauge during the monitoring period. The following corrective action items will be enforced.</p> <ol style="list-style-type: none"> 1. Dust suppression measures in the form of watering the haul roads will be intensified along the perimeter roads to area 6, as well as the normal haul routes. 2. The dust gauges will also now be inspected on a weekly basis, so as to identify any outside factors such as airborne vegetation or deposits from surrounding hedge rows and trees. This will provide for producing a more representative sample from these gauges. 3. The windsock installed at the entrance will be more closely monitored as required by the Dust Handling Procedure and will be used for more effective deployment of the dust suppression measures. This will provide for producing a more representative sample from these gauges. <p>There are no dwellings adjacent to this location, and now complaints were received from any dwellings further along the route into Bangor Erris. All other dust gauges on the site were within the ELV for that period.</p> | | | | |
| Responsibility: | Enda McDonagh, Bord na Mona Energy Ltd | | | | |
| Target Date for Completion: | 11/07/05 | Actual Date of Completion: | | | |
| Closed by (Signature and Title): | | | | Date: | 06/07/05 |