

APPENDIX 18.1
Environmental Management System

For inspection purposes only.
Consent of copyright owner required for any other use.

Site Manager

Procedure: CAP

Page: 1 of 1

Environmental Manager

Rev: 0

Corrective Action Procedure

TABLE OF CONTENTS

- 1.0 ENVIRONMENTAL NON-COMPLIANCE PROCEDURE (EP1.0)
- 2.0 ENVIRONMENTAL CORRECTIVE ACTION PROCEDURE (EP2.0)
- 2.1 ENVIRONMENTAL CORRECTIVE ACTION REPORT FORM (EPF2.1)
- 3.0 ENVIRONMENTAL INCIDENT INVESTIGATION AND REPORTING PROCEDURE (EP3.0)
- 3.1 ENVIRONMENTAL INCIDENT INVESTIGATION REPORT FORM (EPF3.1)
- 3.2 ENVIRONMENTAL NOTIFICATION FORM (EPF3.2)

Srahmore Peat Repository
WL 199-1

Site Manager

Procedure: EN-CP

Page: 1 of 2

Environmental Manager

Rev: 0

Environmental Non-Compliance Procedure (EP 1.0)

- Purpose:** To define a non-compliance and detail subsequent action
- Scope:** Environmental non-conformance and complaints at Srahmore Peat Deposition Site.
- Responsibility:** Site Manager or his/her deputy.
- References:**
1. (EP 2.0) Environmental Corrective and Preventive Action
 2. (EP 3.0) Environmental Incident Investigation and Reporting
 3. (EPF 2.1) Environmental Corrective Action Report Form
 4. (EPF 3.1) Environmental Notification Form
 5. (EPF 3.2) Environmental Incident Investigation Report Form
 6. Environmental Protection Agency Integrated Pollution Control Licence Register no. 507

Procedure:

1. In this case, an environmental non-compliance may be defined as any breach of a condition of the Waste Licence Register 199-1
2. Any environmental non-compliance detected by procedures already described must be communicated to the Environmental Manager who in turn informs the Site Manager or his/her deputy.
3. All relevant personnel are made aware of what constitutes a non-compliance as part of their environmental training and are informed that all non-compliance's, potential or actual, must be reported to the Environmental Manager

4. The Site Manager or his/her deputy, upon being made aware of an environmental non-compliance, will complete an *Environmental Corrective/Preventive Action Report Form (EPF 1.1)* to identify the nature and area of the non-compliance and follow the procedure as detailed in the *Environmental Corrective and Preventive Action procedure (EP 2.0)* to establish a corrective action plan to restore environmental compliance.
5. Where deemed necessary by the Site Manager, and with due reference to Conditions: 11.2, 11.3, 11.4, 11.5 of the Waste Licence, the relevant bodies will be informed of the non-compliance and associated corrective action.

For inspection purposes only.
Consent of copyright owner required for any other use.

Srahmore Peat Repository
WL 199-1

Procedure: ECPAP

Site Manager

Page: 1 of 2

Environmental Manager

Rev: 0

***Environmental Corrective and Preventative
Action Procedure (EP 2.0)***

Purpose: To detail procedures for environmental corrective and preventive action

Scope: Potential and actual environmental non-conformance and environmental complaints at Srahmore Peat Deposition Site.

Responsibility: Site Manager or his/her deputy.

References:

1. (EP 1.0) Environmental non-compliance
2. (EP 3.0) Environmental Incident Investigation and Reporting
3. (EPF 2.1) Environmental Corrective/Preventive Action Report Form
4. (EPF 3.1) Environmental Incident Investigation Report Form
5. (EPF 3.2) Environmental Notification Form
6. Environmental Protection Agency Waste Licence Register no. 199-1

Procedure:

1. On notification of an environmental non-conforming situation, or upon identification of a potential non-compliance through *EP1.0 Environmental non-compliance*, the Site Manager or his/her deputy will initiate and document the situation on the *Environmental Corrective/Preventive Action Report Form (EPF 2.1)*.
2. The Environmental Manager in conjunction with the Site Manager and/or his/her deputy assesses non-compliance's and potential non-compliances and relevant personnel are appointed to establish a corrective action plan. When the corrective action plan has been agreed, it will be authorised, and those responsible for the implementation of the plan will promptly conduct their duties as described therein.

3. The Site Manager or his/her deputy will ensure that any amendments to all issued procedures and/or work instructions as a result of corrective actions will be undertaken and recorded.
4. The Site Manager will monitor the implementation of corrective action, and on completion, shall assess if training or modification of a work procedure is required. If so a *Training Request Form* is completed (EPF 7.1).
5. On successful completion of the corrective action plan, the Site Manager will close off the corrective action plan.
6. As a result of a non-compliance situation and the corrective action taken, a plan of preventive actions will be developed and implemented to a magnitude corresponding to the non-conformance encountered.
7. All completed forms and action plans shall be retained on file at the facility in the Environmental Managers office.

For inspection purposes only.
Consent of copyright owner required for any other use.

BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED
Srahmore Peat Deposition Site WL. 199-1

Environmental Corrective/Preventative Action Report Form (EPF 2.1)

Reference Number		Date	/ /	Initiator:	
Nature of non-compliance?	Actual / Potential	Description of non-compliance			
Bodies Informed, Date and Details:					
Identified as a Result of:					
Identified by:				Date of Identification:	/ /
Action Plan:					
Responsibility:					
Target Date for Completion:	/ /	Actual Date of Completion:	/ /		
Closed by (Signature and Title):				Date:	/ /

For inspection purposes only.
 Consent of copyright owner required for any other use.

Srahmore Peat Repository
WL 199-1

Site Manager

Procedure: EIRR

Page: 1 of 2

Environmental Manager

Rev: 0

Environmental Incident Investigation and Reporting (EP3.0)

Purpose: To detail the appropriate response to an Environmental Incident

Scope: Environmental accidents/emergencies

Responsibility: Site Manager and/or his/her deputy

References:

1. (EP 1.0) Environmental non-compliance
2. (EP 2.0) Environmental Corrective and Preventive Action
3. (EPF 2.1) Environmental Corrective Action Report Form
4. (EPF 3.1) Environmental Incident Investigation Report Form
5. (EPF 3.2) Environmental Notification Form
6. Environmental Protection Agency Waste Licence No. 199-1

Procedure:

1. All environmental incidents must be reported to the Site Manager as soon as they occur.
2. The Site Manager with the assistance of the Environmental Manager will perform an immediate initial assessment of the incident. This assessment will determine the significance of the incident and whether corrective action must be taken (*EP2.0-Environmental Corrective and Preventive Action*). Findings of this assessment are recorded on the *Environmental Incident Investigation Report Form (EPF 3.1)*.
3. The Site Manager or his/her deputy, with reference to (*EP 2.0 Environmental Corrective and Preventive Action*), in consultation with the Environmental Co-ordinator, will instigate any appropriate *Environmental Corrective/Preventive Action (EP2.0)* to eliminate or minimise the environmental impact of the

incident. This action will be executed by the Site Manager, his/her deputy or by appointed suitably trained personnel. Any Corrective Action is detailed in the *Environmental Corrective and Preventive Action Report Form (EPF2.1)* and referenced in the *Environmental Incident Investigation Report Form (EPF3.1)*.

4. Where deemed necessary by the Site Manager or his/her deputy, and with due reference to Conditions: 11.2, 11.3, 11.4, 11.5 of the Waste Licence, the relevant bodies will be informed immediately of the non-conformance and associated corrective action. The *Environmental Notification Form (EPF3.2)* shall be completed at this stage.
5. Where the incident results in a significant environmental impact, an Environmental Programme will be established to eliminate or minimise the impact.
6. The Site Manager shall provide a proposal to the Agency for its agreement within one month to develop a preventative plan to avoid reoccurrence of the incident and to put in place any other appropriate remedial action.

For inspection purposes only.
Consent of copyright owner required for any other use.

BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED
 Srahmore Peat Deposition Site WL. 199-1

Environmental Incident Investigation Report Form (EPF 3.1)

Report No.		Date and Time Recorded	/ /	Date and Time of Incident	/ /
			am/pm		am/pm
Nature of Incident					
Cause of Incident					
Environmental Significance of Incident					
Personnel Involved/Affected					
Statutory Bodies Informed and Details					
Consequences of Incident					
Corrective Action Required?	Yes / No	Corrective Action Report No.			
Signed:		Date			

For inspection purposes only.
 Consent of copyright owner required for any other use.

BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED
Srahmore Peat Deposition Site WL. 199-1

Environmental Notification Form (EPF 3.2)

Company Name:		Phone No.:		Contact Person:		Phone No.:		
		Fax No.:				Fax No.:		
Location of Incident:								
Date and Time of Incident:				Duration of Incident:				
Nature of Incident:								
Source of Incident:						Has source been isolated?		
Cause of Incident								
Environmental Significance of the Incident:								
Corrective Action Taken?:		Corrective Action Ref. No.:		Environmental Incident Investigation Report Form Completed?				
Preventive Action Taken?		Preventive Action Ref. No.:		Remedial Action Taken?		Ref. No.:		
Emergency Services Contacted?:								
Details of Other Bodies Contacted:								
Signed:								

For inspection purposes only. Consent of copyright owner required for any other use.

Srahmore Peat Repository
WL 199-1

Yard Inspection Log (YIL)
Daily & Weekly Inspections – Monthly Record Sheet

<i>DESCRIPTION</i>	<i>CHECKED BY</i>	<i>DATE</i>	<i>COMMENTS</i>
Sump Chamber			
Grit Trap			
Oil Interceptor			
Sump Chamber			
Grit Trap			
Oil Interceptor			
Sump Chamber			
Grit Trap			
Oil Interceptor			
Sump Chamber			
Grit Trap			
Oil Interceptor			

For inspection purposes only.
Consent of copyright owner required for any other use.

Srahmore Peat Repository
WL 199-1

Site Manager

Procedure: ECP

Page: 1 of 2

Environmental Manager

Rev: 1

Environmental Complaints Procedure

Purpose: To ensure all environmental complaints are dealt with effectively.

Scope: External and internal environmental complaints.

Responsibility: Site Manager or his/her environmental deputy

References:

1. Environmental Complaints Form (EPF 5.1)
2. Environmental Corrective Action Procedure (EP 2.0)
3. Environmental Corrective Action Report Form (EPF 2.1)

Procedure:

1. All environmental complaints with regard to the activities at the Peat Repository of the company are recorded, investigated and actioned if deemed necessary, or feasible, by the Site Manager or Environmental Manager.
2. The Site Manager or his/her environmental deputy will ensure that all environmental complaints written and verbal, from internal and external sources, are recorded on an Environmental Complaints Form
3. The Environmental Complaints Form will be processed by the Site Manager or Environmental Manager with any further relevant documentation attached.
4. Each Environmental Complaints Form will be completed with information detailing the name and address of the complainant, when known, and the time and date of the receipt of the complaint. The Environmental Complaints Form will also contain a reference number and detail the nature of the complaint including the time and date of the incident.
5. The Site Manager or his/her environmental deputy will investigate each complaint and record the results of the investigation on the Environmental Complaints Form. The results will indicate whether the complaint is valid, the source of the complaint, and whether corrective action is required. If corrective action is required, the Site

Manager or his/her deputy will initiate corrective action as per the *Environmental Corrective Action Procedure (EP 2.0)*.

6. The Site Manager and/or his/her environmental deputy, following consultation relevant employees of Bord na Móna Energy Limited, will notify all complainants of the result of the investigation and any associated corrective action, where possible within 14 days of receipt of complaint. The Environmental Complaint Form will detail the date that information was sent to complainants and authorised by the signature of the Site Manager and/or his/her environmental deputy.
7. All completed Environmental Complaints Forms are placed within a register of environmental complaints and maintained on file by the Site Manager or his/her environmental deputy. This Register will also include a summary list of filed forms. A copy of this register shall be maintained in the facility office at the Peat Deposition Site Office.
8. All complaints will be discussed at the following Environmental Management meeting and further corrective action may be required as a result.

For inspection purposes only.
Consent of copyright owner required for any other use.

BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED

Srahmore Peat Repository
WL 199-1

Environmental Complaint Form (ECF)

Method of Complaint : _____ **Ref: No.** _____

Letter ___ Telephone Call ___ Interface ___ Other ___

Date Received : _____

Name Of Complainant : _____

Address : _____

Telephone No's : _____ **Ph.** _____ **Mob.** _____

Complaint Description	

Complaint Received By : _____

Complaint Forwarded to for Inspection : _____

Investigation Report	

Resolution	

Work Progress	

Corrective Action Required: Yes/No _____ **Ref. No.** _____

Date Resolved : _____ **Signed :** _____

For inspection purposes only.
Consent of copyright owner required for any other use.

**Srahmore Peat Repository
WL 0199-01**

Procedure:CSSP

Site Manager

Page: 1 of 2

Environmental Manager

Rev: 1

Composite Sampler Service Procedure

1. Purpose

The purpose of this procedure is to provide for the efficient, uniform and representative weekly servicing of the Composite Sampler in accordance with the requirements of Waste Licence.

2. Scope

The scope of this procedure covers all Composite Samplers on-site

3. Responsibility

The servicing of the Composite Sampler is the responsibility of the Environmental Coordinator or an individual appointed by the Site Manager

4. Procedure

4.1 The sampler is visited once a week to remove samples and replace with clean empty bottles.

4.2 The sampler cover is removed and the programme is stopped.

4.3 The top of the sampler is removed, the securing ring removed, and the 7 x 2 litre composite samples are extracted from the sampler. The 8th bottle ie. the one being filled on the day of servicing, is placed in position 1.

4.4 A cap is placed on the composite sample bottle and it is gently agitated to provide a representative sample. The 1 litre plastic sample bottle is rinsed before filling from the 2 litre composite bottle. Where a sample volume is below the required volumes as set out below, the flow should be reduced so as to provide sufficient volumes in the next week.

- A minimum of 500mls in a plastic container is required for the daily composite samples for Total Solids and Total Suspended Solids analysis.
- A minimum of 1 litre of sample in a plastic container is required for the full suite of analysis on the composite samples. **If no sample has been collected for the day receiving the full suite of analysis, then a grab sample should be taken.**

4.5 All of the 2 litre composite sample bottles are **rinsed/cleaned thoroughly** and returned to the sampler, the securing ring and sampler cover replaced.

4.6 Each sample bottle for transportation to the Lab, is labeled with the following information provided:

Waste License No: WL 0199-01

Sample ID: (Composite sample SW4 or 104)

Client: (Bord na Mona Energy Ltd)

Sampling Date & Time: Date the composite sample was taken.

4.7 In addition to this a chain of Custody must be filled in. This will give the details of the sample, the analysis required, the sampler, transporter, and will be signed in by personnel from the lab.

A copy is attached.

4.8 The sampler must then be restarted, by running the programme.

4.9 Before leaving the site, the velocity probe and the conductivity meter should be checked for debris & scum build up, as this reduces the

performance of the flow meter. The suction head should also be checked for accumulated dirt/peat.

4.10 Samples must be delivered to the laboratory ASAP after sampling, at least, 24 hrs after taking the samples.

*For inspection purposes only.
Consent of copyright owner required for any other use.*

Site Manager

Procedure: DHP

Page: 1 of 1

Environmental Manager

Rev: 2

Dust Handling Procedure

1. Purpose

The purpose of this procedure is to provide for the protection of the environment by reducing dust blow during transport operations at the site. This will be achieved by adopting a Dust Handling Procedure.

2. Scope

The scope of this procedure covers the entire road and bog transport network within the site boundary

3. Responsibility

The implementation of the Dust Handling Procedure is the responsibility of the Site Manager

Procedure

1. Meteorological Records are maintained at the Srahmore site. These include rainfall, evaporation & wind direction (using the installed wind sock).
2. If during any particular day, it is felt that the weather conditions are such that they may cause dust blow off the entrance road, peat reception area or internal haul roads, or if dust is observed blowing off these surfaces, appropriate measures should be taken. These observations should be noted on the attached daily inspection logs.
3. The tractor and water tanker should be deployed to dampen down all road surfaces, during the day in question.
4. The water tanker should be kept full at all times, and refilling should only occur at the sump on the main outfall.

5. Where excessive dust starts to accumulate on these surfaces, it should be swept to the side using a hydraulic brush.
6. Where dust suppression measures are required, these incidents should be noted on the day to day operational records.

For inspection purposes only.
Consent of copyright owner required for any other use.

Srahmore Peat Repository
WL 199-1

Site Manager

Procedure: EMDS

Page: 1 of 2

Environmental Manager

Rev: 1

Environmental Management Documentation System

Purpose: To ensure that all procedures/codes of practice, inspections/ audits, reports, correspondence, notices and documentation are appropriately file and managed in relation to date of issue, reporting periods, revisions, replacement of notices and the reporting requirements of the Waste Licence.

Scope: All documentation relating to the management and day to day operation of the Srahmore Peat Reception Site

Responsibility: Site Manager or his/her environmental deputy

Procedure:

Correspondence.

1. All correspondence relating to the project, received at the site office at Srahmore, or at the Oweninny office, should be date stamped and file in the site office.
2. All correspondence requiring a response from Bord na Mona should be filed in an Action folder and brought to the attention of the Site Manager.
3. All correspondence from the site office should be given a reference no. and indication of the identity of the intended recipient e.g., WL199/001/EPA, Srahmore/002/MayoCOCO etc.
4. All correspondence from the site office should be signed off by the Site Manager.

For inspection purposes only
Consent of copyright owner required for any other use

Procedures:

1. All documented procedures should have a code and revision no.
2. All documented procedures issued to personnel should be signed for by the individual and a record of recipients maintained.
3. Each new revision of a procedure should be printed on different colour paper with the updated revision no.

Inspections/Audits

1. All inspection forms should be kept in individual files, clearly relating their purpose.
2. All inspection forms should be dated and signed by the inspector.
3. Where possible, inspection logs should be inserted on an electronic database.

Reports:

1. All reports relating to the operation and monitoring of the site should be prepared and sent to the relevant authority within the time period permitted.
2. All reports should be certified by the Site Manager.
3. All reports sent to the relevant authorities, should include an original and two copies. A copy should also be kept on file.
4. All reports to be given a reference no. and should be compiled in electronic format.

Notices:

1. All notices posted on site should be given a revision no.
2. All notices should be laminated and posted in a secure manner.
3. All revision of notices should be posted in a different colour, with the appropriate revision no.

General:

1. All environmental documents should be filed appropriately at the site office.
2. As part of the requirements of Condition 2.2.2.7 Communications Programme, the public must be able to obtain information at the facility, at all reasonable times, concerning the environmental performance of the facility.

2.1. A public file must be maintained, containing the following:

- Annual Environmental Report
- Monitoring Records
- The Environmental Policy Statement.
- The Complaints file.

2.2. It should be accessible during normal opening hours (Mon – Fri 0700 to 1900 hrs & Sat 0700 to 1800 hrs).

2.3. All enquires, from the public must be logged and signed by the individual.

For inspection purposes only.
Consent of copyright owner required for any other use.

Site Manager

Procedure: EMP

Page: 1 of 1

Environmental Manager

Rev: 1

Environmental Monitoring Procedure

1. Purpose

The purpose of this procedure is to provide for the protection of the environment by inspecting all potential and actual surface water discharges from the site. Discharges from the peat deposition area are dealt with under the Silt Pond Inspection Procedure (3.0 SPIP)

2. Scope

The scope of this procedure covers all run-off from the peat reception, oil refuelling tank, carpark, and canteen/office areas.

3. Responsibility

The implementation of the Environmental Monitoring Procedure is the responsibility of the Site Foreman

Procedure.

1. All oil-traps/interceptors will be inspected on a weekly basis using the attached log.
2. Discharges from the Oil-traps/Interceptors will be sampled on a monthly basis and samples sent to Complete Laboratory Services Ltd for analysis for COD (mg/l).
3. Based on the weekly visual inspection and COD results from the lab, the interceptor will be cleaned using an appropriate contractor.
4. The oil refuelling area will also be checked for oil/diesel spillage's and any faults with equipment will be reported using the Corrective Action Report Form.

Srahmore Peat Repository
WL 199-1

Site Manager

Procedure:ERP

Page: 1 of 2

Environmental Manager

Rev:1

Emergency Response Procedure (ERP 1.0)

Purpose:

The purpose of this programme is to define appropriate procedures in response to potential emergency situations occurring at the site including Environmental accidents and/or emergencies.

Definitions:

Environmental Emergency Response Team: Site Manager, Environmental Manager, and any other person or persons co-opted by the aforementioned individuals for the specific emergency.

References:

<u>Document No.</u> <u>No.</u>	<u>Description</u>	<u>Revision</u>
ERP 1.1	Oil Spill Clean Up Procedure	0
ERP 1.2	General Fire/Explosion Procedure	0

Procedure:

1. Should an emergency situation occur, appropriate Environmental Emergency Response Procedures, ERP 2.0 to ERP 3.0, which detail each emergency situation and the proposed response should this emergency occur are prepared.
2. Each Environmental Response Procedure is completed with reference to potential emergency situations. The response documented within the Environmental Emergency Response Procedure reflects the likelihood of the situation occurring and the associated potential environmental impacts of this occurrence.

3. On a Monthly basis the Site Manager or his/her deputy checks all emergency response equipment to ensure that it is provided in agreed quantities and in suitable working order. Any discrepancies shall be reported at once to the Site Manager and Environmental Manager.
5. Following an emergency, details of the incident shall be recorded on the Environmental Incident Investigation Form (EPF3.1) located within the Environmental Incident Investigation and Reporting Procedure (Environmental Procedure EP 3.0). Following this the Environmental Corrective and Preventive Action Procedure (EP 2.0) shall be implemented accordingly, to introduce a corrective and preventive action.
6. In the event of an incident occurring, records shall be maintained and the EPA shall be notified by telephone and facsimile as soon as possible and not later than 10.00am the following working day after the occurrence of the incident. Local Authority, Duchas and the North Eastern Regional Fisheries Board shall also be notified in the event of any incident which relates to discharges to surface water as required by condition 11.3, 11.4, & 11.5.

The written record shall be submitted to the Agency as soon as practicable and in any case within five working days after the occurrence of any incident.

Should any further actions be taken after the date of written notification, as a result of any incident occurring, a written report shall be forwarded of those actions to the Agency as soon as practicable and no later than ten days after the initiation of those actions.

For inspection purposes only
Consent of copyright owner required for any other use.

Srahmore Peat Repository
WL 199-1

Site Manager

Procedure:ERP

Page: 1 of 4

Environmental Manager

Rev: 1

**Emergency Response Procedure (ERP 2.0)
(Oil, Diesel & Petrol Spillage's)**

Purpose:

This procedure details the steps to be taken when dealing with an oil/diesel/petrol substance spill on site. It is required in order to:

- Protect Employees
- Protect the Environment
- Prevent Fugitive Emissions

This procedure should be followed for all large and massive spills, which may occur.

Definitions:

Small Spill: Greater than 5 litres and less than 250 litres

Large Spill: Greater than 250 litres.

Responsibility:

General staff and sub-contractors of Bord na Móna, Energy Limited, are responsible for being aware of the procedure and their responsibilities/requirements/obligations.

Procedure:

1. Ensure all diesel/oils are handled (loaded, unloaded and moved) by a competent person using the correct procedure. Appropriate precautions should be taken at all times to minimise the risk of accidental spillage.
2. In the event of a spillage occurring the Site Manager or his/her environmental deputy shall initially investigate the following issues:

- How long has it been since the incident occurred?
 - Consult the relevant data sheets (Material Safety Data Sheets or otherwise) for the method of spill containment and fire control of the affected material.
3. The spill must be assessed immediately by the Environmental Manager and or Site Manager for potential risks to health and safety of employees, and the potential environmental consequences.
 4. If there is a risk of explosion, all personnel in the area must be evacuated from the area.
 5. The spill should be sourced, isolated, and contained with polystyrene booms or dry peat (moisture content of 10%)
 6. All effort should be made to prevent the spill from entering a storm drain or the nearest outfall.
 7. If the spillage emanated from a drum, it is positioned so that the ruptured section is in upwards direction, thereby preventing further leakage.
 8. Use shovels, brushes or a machine to sweep the spilled material in to drums.
 9. Start on the outside and work in towards the centre of the spill.
 10. Do not mix different types of waste.
 11. Drum the waste and seal the container or bag and double bag
 12. Label the waste with the destination name, appropriate hazard label and name of waste, giving as much information as possible on contents, plus concentrations of constituents if applicable etc.
 13. If the spill occurred due to a damaged drum, place the ruptured drum into a salvage drum container, until disposal is arranged.
 14. Once the spill has been contained, suitable absorbent pads, to soak the spillage must be applied.
 15. All possible ignition sources such as electrical equipment, naked lights, machinery etc should be removed from the area. Any combustibles in the spill area should be removed.
 16. Follow-up action measures taken must include the implementation of appropriate remedial work to prevent such a spillage incident reoccurring in

future.

17. The Environmental Protection Agency, Regional Fisheries Board, and Local Authority Personnel are contacted by the Site Manager/Environmental Manager in the event of any incident occurring, paying due regard to Conditions 4 and using the Environmental Notification Form (EF3.2). Following an emergency, details of the incident shall be recorded on the Environmental Incident Investigation Form (EPF3.1) located within the Environmental Incident Investigation and Reporting Procedure (Environmental Procedure EP 3.0). Following the environmental incident investigation appropriate procedures shall be implemented accordingly i.e. Environmental Non-Compliance Procedure (EP 1.0) and the Environmental Corrective Action Procedure (EP 2.0)

A shortened version for posting at the Site is attached on the following page.

*For inspection purposes only.
Consent of copyright owner required for any other use.*

Srahmore Peat Repository
WL 199-1

EMERGENCY PROCEDURE IN THE EVENT OF OIL SPILLAGE

Inform Site Manager

Site Manager to inform EPA & Local Authority

Block outfall at nearest point

Establish cause and prevent further leakage

Inspect outfall downstream

Inspect receiving water (River/Stream/Lake)

Establish limit of spillage

Install booms in the outfall

Use the Oil Spill Kit provided

Arrange remedial work to prevent future occurrences

Requirements: Map of drainage system
 Stock of containment booms
 Oil Spill Kits

BORD NA MÓNA 
BORD NA MÓNA ENERGY LIMITED

Srahmore Peat Repository

Site Manager

Procedure:ERP

Page: 1 of 12

Environmental Manager

Rev: 1

Emergency Response Procedure (ERP 3.0) (General Fire/Explosion Procedure)

Purpose:

A procedure to deal with fire/explosion emergencies is required for the following reasons:

- To protect Employees.
- To protect the Environment.
- To prevent Fugitive emissions.

Responsibility:

General staff and sub-contractors of Bord na Móna, Energy Limited, are responsible for being aware of the procedure and their responsibilities/requirements/obligations.

RECOMMENDATIONS

GENERAL

1. The Site Manager will delegate a member of his staff to be responsible for all aspects of fire safety.
2. All fire equipment not deployed should be stored in a warm dry fire depot.
3. The Manager should specify certain persons who would be contacted in the event of a fire.
4. A formal report on fires involving people, stocks, buildings or equipment should be reported to the Safety Officer via form (Appendix III).
5. Formal records of all inspections and test of fire equipment should be maintained.

6. There should be a system of re-charging of extinguishers after usage. This system should include a method of delivering extinguishers to re-charge point.
7. A reserve water supply capable of dealing with any fire emergency on site, shall be maintained.
8. Fire wagon or fire depot contents should be listed in (Appendix IV).
9. A suitable vehicle capable of transporting all fire equipment during a fire emergency should be available and well maintained at all times.
10. Smoking should only be allowed in designated areas.
11. Fire Equipment should not be used for any other purposes and should be serviceable at all times.
12. As a matter of urgency all fire alarm systems should be completed and maintained to comply with Section 27B of the Safety, Health and Welfare at Work Act 1989.
13. Storage or usage of all flammable oil solvents or gases should be in accordance with I.S. 644 1983 and I.S. 3213 1987.
14. Warning notices should be kept in good condition and must be strictly observed at all times.
15. All electrical appliances and welding plants should be switched off when not in use. Gas bottles should be turned off when not used.
16. Where there is a clearly recognised fire danger, extinguishers shall be deployed as a first means of defence.
17. All lorries, vans, locos and other machines working in a dusty environment should have a suitable fire extinguisher(s) mounted in a convenient position. (Appendix V).
18. Details of all local fire authorities should be displayed at various points throughout the Works.
19. The annual service contract for all fire equipment should be continued.

RECOMMENDATIONS

BOG AREAS

1. Roadside signs should be erected in prominent positions and be maintained. They should only be erected during the months of fire dangers.
2. Notices of fire prevention should be located at strategic points to be decided by local management. See Appendix (I and II).
3. All machines must be washed down and cabs cleaned out on a regular basis to minimise the risk of fire. Particular care should be taken with production and loading machinery.
4. Cylinders of gas should be mounted outside of machine cabs and tea centres at all times.
5. A 4.5 kg. powder extinguisher should be mounted in all tea centres.

*For inspection purposes only.
Consent of copyright owner required for any other use.*

RECOMMENDATIONS

WORKSHOPS, STORES

1. Petrol and other oils (unless they are stored in non-flammable containers to BS 3475) should only be stored in designated oil stores.
2. Batteries should not be charged in working areas unless suitable protection is provided.
3. Flash-back arrestors should be fitted to all oxy-acetylene equipment.
 - a) Oxygen cylinders should be stored separately to fuel gas cylinders.
 - b) Oxygen and fuel gas cylinders, if stored out of doors, should be protected from sunlight.
 - b) All cylinder heads should be kept free of oil and grease.
4. Flame retardant overalls should be worn by all personnel exposed to heat or sparks.
5. Clearways to fire exits and means of escape should be unobstructed at all times.

For inspection purposes only.
Consent of copyright owner required for any other use.

RECOMMENDATIONS

OFFICES AND CANTEENS

1. Each canteen should be equipped with a fire blanket & fire extinguisher.
2. There should be at least one fire point in all office premises.

*For inspection purposes only.
Consent of copyright owner required for any other use.*

TRAINING

All personnel working on the Site shall be given training in the following areas for fires:

- The correct use of fire extinguishers. This training will be carried out on an annual basis.
-
- The correct use of the fire tractor and its equipment.
- The fire emergency plan.
- Precautionary measures to minimise the risk of fire.

*For inspection purposes only.
Consent of copyright owner required for any other use.*

APPENDIX (I)

BORD NA MONA

INSTRUCTION TO EMPLOYEES REGARDING FIRE DANGERS

There is always danger of disastrous fires occurring on the bog unless great care is taken by everybody. This danger is very great during fine weather. You can do your part by obeying these few simple rules:-

- DON'T** throw away burning matches or cigarette ends. Make sure that they are properly extinguished first.
- DO** remember that big fires have small beginnings.
- DO** put out fires yourself if you can.
- DO** report them immediately to your supervisor if you can't
- DO** remember that big fires can be prevented and that you can play a big part in their prevention.

Follow these instructions carefully.

Remember that fires may cause personal injury.

APPENDIX (II)

BORD NA MONA

FIRE WARNING

1. Don't leave unattended fires.
2. Ensure that all fires are extinguished before leaving bog.
3. Do not burn gorse or heather in this area during the period beginning on the 15th day of April and ending on the 31st day of August in any year. (Ref: Wildlife Act 1976, Ch. 4 Sect. 40).
4. Don't throw away lighting cigarette ends or matches.
5. Report any fires immediately to local fire authority.

*For inspection purposes only.
Consent of copyright owner required for any other use.*

APPENDIX (III)

FIRE REPORT FORM

Works: _____ Date: _____

Date of Fire: _____

Day: _____ Time: _____

Location: _____

Machine No. and Type: _____

Description of Fire: _____

Fire Equipment Available: _____

Injury to Personnel: _____

Estimated Cost of Damage: _____

Was Fire Brigade Called? _____ Which Brigade? _____

Who Called Brigade? _____ Time: _____

Was Fire Crew Called? _____

Was Hot Work permit Used? _____

Cause of Fire (Suspected): _____

Recommendations to Prevent Re-occurrence: _____

COPY TO BE SENT TO SAFETY OFFICER

APPENDIX (IV)

FIRE WAGON CONTENTS

Quantity	Items
2	4 Gal. Petrol Drum's of Petrol
34	Hoses (75' Lengths)
3	Hose Nozzles
10	Shovels
8	Helmets
1	Hose Junction
1	5 Gal. Diesel Drum
2	Suction Hose
1	Blank Cap
1	Hydrant Key
4	Baskets
2	Spanners
1	Hose Adapter
1	9 Hole Bar
2	Stand Pipes
7	Flash Lamps
7	Goggles
2	Breathing Apparatus
4	Beacons
1	Stretcher
6	Extinguisher's
1	First Aid Kit
1	Foam Making Machine
1	Manually Mobile Angus Fire Pump
5	Drums of Foam

For inspection purposes only.
Consent of copyright owner required for any other use.

Location	Machine Type	Size of Ext.	No. of Exts.	Type of Ext.
	Tractors up to 100 HP	4.5 Kg.	1	ABC Dry Powder or Foam
	Tractors over 100 HP	9 Kg.	1	ABC Dry Powder or Foam
	Double Ridger	9 Kg.	1	ABC Dry Powder or Foam
	Harvester Types 6,7	4.5 Kg.	2	ABC Dry Powder or Foam
	Bulldozers	4.5 Kg.	1	ABC Dry Powder or Foam
	Excavators	4.5 Kg.	2	ABC Dry Powder or Foam
	Locomotives	4.5 Kg.	1	ABC Dry Powder or Foam
	Canteens	1.5 Kg or Fire Blanket	1	BCF

For internal purposes only.
Consent of copyright owner required for any other use.

BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED

Srahmore Peat Deposition Site

Waste Management Record (Hazardous)

Waste Licence no. : _____

WASTE DESCRIPTION	EWC CODE	TONNES	NAME OF CONTRACTOR	NAME OF PERSON ULTIMATELY RESPONSIBLE	DESTINATION	DATE
Lubs,Hydraulic oil, Oil/Fuel Filters, Lead Acid Batteries, Florescent Tubes, Degreasing Still-bottoms, Anti-Freeze			Transporter of waste	Disposer of waste if different from transporter	Find out from contractor	

For inspection purposes only.
Consent of copyright owner required for any other use.

DETAILS OF ANY REJECTED CONSIGNMENTS						
None to date						

Srahmore Peat Repository
WL 199-1

Site Manager

Procedure:O/DLP

Page: 1 of 3

Environmental Manager

Rev: 1

Oil/Diesel Loading Procedure

1. Purpose

The purpose of this procedure is to ensure that the company will take all the necessary steps to protect the environment from accidental spillage's arising from refuelling of machines on site.

2. Scope

The scope of this procedure covers the following diesel & oil loading/unloading operations

- External delivery of oil/diesel from the supplier to a mobile, double skinned tank on site.
- Internal refuelling of machines from the mobile oil/diesel tanks.

3. Responsibility

It is the responsibility of the Site Manager to ensure all personnel and contractors associated with the works and involved in handling oil/diesels are made aware of this procedure and adhere to it in their day to day operations

4. Procedure

External delivery from oil/diesel supplier.

1. The oil/diesel supplier must have an adequate spill clean-up kit on board the tanker in the event of a spillage.
2. The operator of the tanker must be present at all times while the delivery of the oil/diesel takes place.
3. A Bord na Mona employee must be present to supervise the delivery of the fuel.

4. The operator must be made aware of the location of Bord na Mona's spill kits/dry peat.

Internal refuelling of machines from mobile oil/diesel tanks.

1. The operator of the machine, should be present at the re-fuelling nozzle at all times during the re-fuelling.
2. The re-fuelling hose should be returned to the correct position on the tank once finished
3. All barrels on their side's, should contain a drip-tray.
4. The tank shall contain a spill kit/dry peat, in the event of an oil/diesel spill.
5. The Site Manager/Foreman/Environmental Manager should be notified at once, of any accidental oil/diesel spillage's during re-fuelling.
6. All empty barrels, being returned to the works, should be returned to the area labelled as empties.
7. All leaks, wear and tear and mechanical difficulties should be reported to the Site foreman.
8. Any incidents involving oil/diesel spillage's shall be reported to the EPA within 5 days. A Corrective Action Report Form will be included.

For inspection purposes only.
Consent of copyright owner required for any other use.

Srahmore Peat Repository WL 199-1

Site Manager

Procedure: RNCP

Page: 1 of 1

Environmental Manager

Rev: 2

Road Network Cleaning Procedure

1. Purpose

The purpose of this procedure is to provide for the maintenance of the road network in and around the site, which is used for peat delivery.

2. Scope

The scope of this procedure covers all internal roads.

3. Responsibility

The implementation of the Road Network Cleaning Procedure is the responsibility of the Site Foreman

Procedure

1. A tractor and road sweeper will be on standby, on-site for all road sweeping Operations.
2. All roads used in connection with peat delivery operations will be inspected on a daily basis for peat debris, which may cause a nuisance to other road users.
3. All road haulage operators will report any spillage's to the Site Foreman.
4. Where a road requires cleaning, the tractor and sweeper will be deployed to remove any debris to the roadside.
5. All peat/debris scraped from the road will be secured away from any drains and barriers put in place where this is not possible.
6. In addition to this, where dry conditions occur, causing problems with dust from road haulage of the peat, the dust dampening bouser will be used as per the Dust Handling Procedure (7.0 DHP).

Srahmore Peat Repository Site WL.199-1

Site Manager

Procedure: SCP

Page: 1 of 1

Environmental Manager

Rev: 2

Silt Control Procedure

1. Purpose

The purpose of this procedure is to provide for the protection of the environment by minimising silt production.

2. Scope

The scope of this procedure covers all of the Peat Repository Site.

3. Responsibility

The implementation of the Silt Control Procedure is the responsibility of the Site Foreman.

4. Procedure

1. During predicted periods of high rainfall, the swale gate will be closed and any water backing up in the swale drain will be pumped out into the controlled over flow area.
2. Drainage manholes are protected and maintained free of excessive peat.
3. Headlands are kept clean and free of excessive loose peat.
4. All new manholes and outfalls are set well back from turning grounds, and drivers of bog plant do not turn short (over drains) at headlands.
5. Silt run-off, while piping or ditching, is minimised.
6. Outfalls are controlled to minimise silt discharge during cleaning operations.
7. Drains are ditched in dry weather.
8. While ditching, outfalls are blocked and ditching should take place towards the outfall.
9. Machine operations involved in moving the peat from the high fields to the deposit area will be carried out in a manner that prevents excessive loss of material to intervening drains.

General Manager

Procedure: SPEP

Page: 1 of 1

Environmental Co-ordinator

Rev:1

*Silt Pond
Excavation Procedure*

1. Purpose

The purpose of this procedure is to provide for the correct excavation and installation of all silt ponds within the Bord na Mona group of IPC licensed activities.

2. Scope

The scope of this procedure covers all silt ponds treating drainage water from all Bord na Mona production bogs, under IPC licence to the Environmental Protection Agency

3. Responsibility

It is the responsibility of the Bog Foreman and Environmental Co-ordinator to ensure that this procedure is adhered to and brought to the attention of all personnel engaged in this work.

4. Procedure

1. The sizing of the silt pond must be to Bord na Mona's design criteria.
2. Where an outfall is already in place, it must be blocked for the duration of the silt pond excavation. Where this is not the case, such as a new site, the silt ponds must be full excavated and controlled before connection to the outfall/stream or river.
3. The water depth of the pond must be maintained to at least 1.5 metres below the invert of the inlet pipe.
4. While excavating the pond, the spoil should be deposited well back from the edge of the pond, so as to provide room for maintenance and for bank stability.
5. The level of the base of the pond at the inlet should be maintained along the length of the pond to the outlet.
6. Depending on the machines available on site for maintenance, the silt pond should be 8 metres wide, with sloped banks.
7. The controls at the inlet and outlet of the pond should be maintained at the same level, so as to provide sufficient retention time for silt settlement.
8. Where two ponds are installed in parallel, sufficient room for maintenance should be provided between the two ponds.

9. Where required, an adjustable weir should be provided at the outlet, for use during maintenance operations or during expected heavy rainfall events.
10. All new silt ponds must be allocated a silt pond number and emission point number, inline with the existing silt pond log. Signage displaying these details should be erected at the pond.

*For inspection purposes only.
Consent of copyright owner required for any other use.*

BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED

Silt Pond- Outfall -River (SPI) Weekly Inspection (Monthly Record Sheet)

Site: _____ Waste Licence no.: _____

Silt Pond								
Silt Pond no.	Checked By	Date	Full				Comments	Date Cleaned
			1/4	1/2	3/4	full		
Outfall Inspection								
Date	Comments						Date Cleaned	
River Inspection								
Date	Comments							

For inspection purposes only. Consent of copyright owner required for any other use.

Srahmore Peat Repository Site WL.199-1

Site Manager

Procedure:SPIP

Page: 1 of 1

Environmental Manager

Rev:1

***Silt Pond
Inspection Procedure***

1. Purpose

The purpose of this procedure is to provide for visual inspection of all silt ponds on a Weekly basis. This will be used for determining the silt pond de-silting roster.

2. Scope

The scope of this procedure covers all silt ponds treating drainage water from the area of land outlined in red on Drawing Ref. Figure 2 – Site plan in attachment A of the Waste Licence Application.

3. Responsibility

It is the responsibility of the Site Foreman to ensure all silt ponds are inspected on a Weekly basis and that these inspections are returned and filed in the facility office.

4. Procedure

1. Record the Silt Pond identification number on the Inspection Log (see attached)
2. Inspect the full length of the Silt Pond including inlets and outlet.
3. Tick the appropriate box on the Inspection Log to indicate the condition of the pond and record the date and time.
4. For ponds in series, the final pond should be clean at all times.
5. If a pond is observed as being ½ full during the weekly inspection, or at any other time arrangements should be made for the de-silting of the pond immediately.
6. Inspect the Outfall from the silt pond to the receiving water (River) and record any observations.
7. Once the silt pond has been cleaned, the date of de-silting should be logged on the Inspection Log.

Srahmore Peat Repository Site WL.199-1

SILT POND MAINTENANCE PROCEDURE

1. If the silt pond system has a by-pass channel or a stand-by pond then the drainage should be diverted through these. If not then the inlet to the pond should be blocked using a gate valve for the duration of the maintenance.
2. If the outlet from the pond has a weir then the level should be lowered so as to de-water the silt. If not, then the outlet pipe should be blocked.
3. The pond should be cleaned from the inlet to the outlet either from one side, if the width allows or from both sides, if not.
4. The silt should be deposited as far back from the silt pond as possible with the excavator, or additionally with the aid of a dozer if space is limited.
5. A peat bund should be left between the pond and the excavated silt so as to stop particularly wet peat from flowing back into the pond.
6. When the pond has been cleaned the inlet should be opened and the pond allowed to fill before lowering the outlet weir.
7. If the drainage was diverted during the maintenance, then it should be redirected back into the pond.
8. If there are signs of peat silt deposited upstream or downstream of the pond, in the outfall, then they should also be cleaned, starting upstream. This should occur once the pond has been cleaned and before the outlet weir has been lowered.
9. Once cleaned, the date should be entered on to the inspection log (SPIL).
10. All machine operators must be fully versed with the above procedure and maintain a copy in the machine.

Srahmore Peat Repository
WL 199-1

Site Manager

Environmental Manager

Procedure:TP

Page: 1 of 2

Rev:1

Training Procedure

1. Purpose

2. Scope

The scope of this procedure covers all of the Peat Repository Site.

3. Responsibility

The implementation of the Silt Control Procedure is the responsibility of the Site Foreman.

*For inspection purposes only;
Consent of copyright owner required for any other use.*

Site Manager

Procedure: WDP

Page: 1 of 1

Environmental Manager

Rev: 1

Waste Disposal Procedure

1. Purpose

The purpose of this procedure is to provide for the protection of the environment by providing for the documented on-site classification, labelling, segregation, storage and control of Hazardous & Non-hazardous waste generated on site by Bord na Mona Energy Ltd.

2. Scope

The scope of this procedure covers all of the site works.

3. Responsibility

The implementation of the Waste Disposal Procedure is the responsibility of the Site Manager and/or the Environmental Manager

4. Relevant Documentation

Waste Management Regulations 1998

Waste Management (Transfrontier Shipment of Waste) Regulations, 1998

European Waste Catalogue and Hazardous Waste List January 2002

5. Procedure

1. All wastes generated on site will be collected in appropriate containers for recycling or disposal.
2. A full inventory of all wastes generated will be maintained, with receipts from contractors.
3. Only Licensed Contractors will be engaged to handle the waste.
4. It is proposed to handle the waste as follows:

Waste Oil – Atlas Oil/suitably licensed contractor via Oweninny Works

Waste Oil Filters - Atlas Oil/or suitably licensed contractor via Oweninny

Works.

Batteries – Return to suitable licensed contractor via Oweninny Works.

Canteen/Office Waste – Local Licensed Contractor

Barrels/Drums – Return to supplier/Metal recycler via Oweninny Works.

5. All wastes will be designated either Hazardous or Non-hazardous and assigned the appropriate EWC code.

*For inspection purposes only.
Consent of copyright owner required for any other use.*

APPENDIX 18.2
EPA Site Inspection Reports

For inspection purposes only.
Consent of copyright owner required for any other use.

BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED

FACSIMILE TRANSMITTAL SHEET

TO:	Emma Delancy	FROM:	Enda McDonagh
COMPANY:	Bord na Mona Energy Ltd	DATE:	21/08/2008
FAX NUMBER:	01 8030409	TOTAL NO. OF PAGES INCLUDING COVER:	12 / 14
PHONE NUMBER:	[Click here and type phone number]	SENDER'S REFERENCE NUMBER:	[Click here and type reference number]
RE:	[Click here and type subject of fax]	YOUR REFERENCE NUMBER:	[Click here and type reference number]

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

Emma

Attached site inspection report from Sept 2005 and June 2007 with responses from BNM. These are the only 2 site inspections carried out in 2005 and 2007 as in 2006 the site was closed.

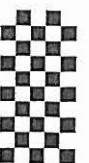
Regards

Enda

For inspection purposes only.
Consent of copyright owner required for any other use.

TOBIN CONSULTING ENGINEERS		
PROJECT NO:		
FILE REF:		
Date Received	21 AUG 2008	
PASS TO	ACTION BY	DATE

[CLICK HERE AND TYPE RETURN ADDRESS]



Site Inspection Report

Mr Enda McDonagh
Environmental Engineer
Bord na Móna Energy Ltd,

Leabeg
Tullamore
Co. Offaly

Date of issue of
Inspection Report: 8/12/2005

Licence Register No: 199-1

Inspection
Reference No: (199-1)05SI02LOS

Date of Inspection: 14/9/2005

Inspectors: Liam Ó Súilleabháin

Announced: Yes

This Site Inspection Report details the Agency's findings following an inspection of Srahmore Peat Deposition Site on 14/09/2005.

In view of the above you are required to submit a schedule to the Agency by 22/12/2005 detailing how the non-compliances and observations specified therein are to be rectified. Please quote the above Inspection Reference Number in any future correspondence in relation to this Report. If you have any further queries please contact Liam Ó Súilleabháin at 094 9046400.

1. SITE INSPECTION AND ASSESSMENT

The Site Inspection commenced at 10:30 and the following were in attendance:

Representing Bord Na Móna energy Ltd.

Richard Cosgrove	General Manager
Enda McDonagh	Environmental Engineer
Mary O Sullivan	Site Engineer

Representing the Environmental Protection Agency:

Liam Ó Súilleabháin	Inspector
---------------------	-----------

An inspection of the site was conducted, special attention was paid to the provisions in place for diverting flow to controlled overflow area, installation of sluice gates on all settlement ponds, ongoing works on lining the swale, and deposition of waste in Fields 5 and 6.

Interview

The following representatives were interviewed during the inspection:

Name	Position	Issue
Enda McDonagh	Environmental Engineer	Various
Mary O Sullivan	Site Engineer	Various
Richard Cosgrave	General Manager	Various

Documentation

The following documentation was requested for review:

Record	Condition No.	Comment
Waste management records	11.11	See Inspection Findings
Site drainage system inspection records	8.9.1	Satisfactory
Visual inspection of surface water discharges	8.9.3	Satisfactory
Silt ponds visual inspection and desilting records	8.9.6	Satisfactory
Monitoring records	8.1	Satisfactory

General Comment

No waste/wet peat had been delivered to the site since July 2005. All ongoing works were to be completed in the following two weeks, and it was planned to then shut down the facility until spring 2006.

At the opening meeting possible alterations to the environmental monitoring programme, particularly, the frequency of sampling and analysis were discussed. In this regard the licensee was advised to submit a detailed proposal, based on the discussion to the Agency for agreement.

With particular reference to record keeping, the level of compliance was found to be high.

The licensee was briefed on the Agency's reporting procedures and was advised that a Site Inspection Report would be issued.

Finally, the licensee was thanked for the courteous and co-operative manner of the staff, and the assistance and co-operation extended during the Inspection.

2. INSPECTION FINDINGS

Inspection Observations

While this observation does not constitute non-compliance with any condition of the Licence, they should be addressed or where relevant noted by the licensee in order to ensure compliance, improve environmental performance of the facility and provide clarification on certain issues, as required. Where requested the actions taken and clarifications requested should be reported back to the Agency.

1. **Waste Collection Permit (WCP)**

The licensee shall forward a full copy to the Agency of the WCP held by haulier engaged in the delivery of wet peat to the facility. The licensee should ensure the WCP is valid and applicable to movement of wet peat.

2. **Waste Records**

The licensee should review its procedures with respect to issuing of identity cards/keys to drivers delivering waste/wet peat to the site so as to ensure that the origin of all deliveries is known. While all keys/cards reported as lost by the drivers are cancelled, a record of all such keys/cards and the drivers in question should be maintained.

3. **Access Roads to Deposition Fields**

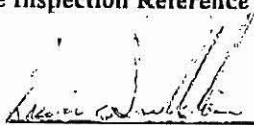
During the site tour, it was noted that considerable quantities of wet peat had accumulated in the field drains where deposition works were being carried out. All drains should be maintained free of excessive peat. In this regard, a sufficient number of access roads with suitable piping should be constructed along the length of the field as necessary so as to avoid excessive stockpiling.

3. FOLLOW-UP ACTIONS

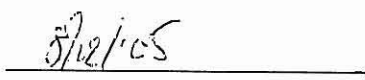
The licensee shall take the actions required to close out the non-compliances and observations raised in this Site Inspection Report. These actions will be verified during subsequent inspections.

Please quote the above Inspection Reference Number in any future correspondence in relation to this Report.

Report prepared by
Inspector:



Date:



For inspection purposes only
Consent of copyright owner required for any reuse.

Liam O'Suilleabhain
Office of Environmental Enforcement
Inspector
Environmental Protection Agency
John Moore Rd.
Castlebar
Co Mayo

December 16th 2005

Ref: W199-1/Srah031
Your Ref: (199-1)05SI07LOS

Re: Response to site inspection (ref (199-1)05SI07LOS)

Dear Mr. O'Suilleabhain

Please find enclosed details of a schedule to address the Inspection Observations noted during your visit to the Srahmore Site on the 14/09/2005. Please ring me if you have any further queries.

Yours sincerely

Enda McDonagh
Bord na Mona Energy Ltd.

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Site Inspection Corrective Action Schedule

Inspection Observations

1. Waste Collection Permit

Iggy Madden Transport Ltd have a waste collection permit, issued by Mayo Co Council on the 30/08/02. This permit was is due to be reviewed and an application for review was submitted by Iggy Madden Transport Ltd, to Mayo Co. Co, before peat haulage commenced.

On enquire with the Environment Section of Mayo Co. Co, the permit is currently being review as part of a larger batch, and will be re-issued shortly. Mayo Co Council is of the opinion that the existing permit covers the transportation of peat, and has prioritised its processing. A copy of this new permit will be forwarded to the EPA, once issued.

2. Waste Records

With regard to the identity of cards/keys assigned to the Iggy Malden's drivers, the following procedure has been put in-place in relation to lost cards/keys:

As all drivers require a key to gain access to the weigh bridge and peat reception area. Any driver, who looses their key, will automatically be refused entry on the system. A supply of replacement keys are kept in the main office. Once a driver has been refused entry due to loss, a new key and number is issued.

A log of all keys issued is maintained in the site office and all drivers are required to sign for a new key. Before the new key is issued to the driver, the old key number is removed from the system. Therefore, if a previously reported lost key is used to gain entry to the weight bridge, access will automatically be denied. This will ensure that only authorised key holders will be allowed access to the site. Attached is a copy of the proposed key log to be used for recording lost and issued keys.

3. Access Roads to Deposition Fields

With regard to the positioning of access roads to the deposition fields, it is proposed to have two entry and exit points. These will allow access to the three sections of the field for peat deposition. This system will allow maintenance work to be carried out at one of the access roads, while maintaining access to the remaining 2 sections. This system will be operated once peat deposition re-commences.

Mr Enda McDonagh
Bord na Mona Energy Limited
Leabeg
Tullamore
County Offaly

Environmental Protection Agency
Regional Inspectorate, John Moore Road
Castlebar, County Mayo, Ireland
Cigireacht Réigiúnach, Bóthar Sheán de Mordha
Caisleán an Bharraigh, Contae Mhaigh Éo, Éire
T: +353 94 904 8400
F: +353 94 904 8499
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

22/06/2007

Our Ref: W0199-01/nc04los.doc

Notification of Non-Compliance

Dear Mr McDonagh

Further to our site visit on 11/06/2007, the Agency has noted the Non-compliances with IPC Licence Reg. No. P0198-01 as detailed in the enclosed *Site Inspection Report* have been noted by the Agency.

ACTION REQUIRED


In view of the above you are required to:

- Carry out the corrective actions specified therein
- Submit a schedule to the Agency by 06/07/2007 detailing how and when the non-compliances are to be closed out.
- Address the Observations raised therein

Failure to comply with the requirements specified in this notification of non-compliance will lead to further enforcement action by the Agency. If you have any queries please contact Liam Ó Súilleabháin at 094 904 848400.

Please quote the above reference in future correspondence in relation to this matter..

Yours sincerely



Mr Liam Ó Súilleabháin
Office of Environmental Enforcement



Site Inspection Report

Mr Enda McDonagh
Bord na Mona Energy Limited
Leabeg
Tullamore
County Offaly

Date of issue of
Inspection Report: 22/06/2007

Licence Register No: W0199-01

Date of Inspection: 11/06/2007

Inspection Reference No: (W0199-01)07SI03LOS

Inspectors: Liam Ó Súilleabháin

Helen Boyce

Announced: No

This Site Inspection Report details the Agency's findings following an inspection of Bord na Mona Energy Limited on 11/06/2007.

NOTIFICATION OF NON-COMPLIANCE

Bord na Mona Energy Limited has been found to be in non-compliance with the conditions of the Waste Licence as set out in this Site Inspection Report. You are required to undertake the corrective actions specified to close out the Non-Compliances and Observations raised in this Report or further enforcement action may be taken by the Agency.

In view of the above you are required to submit a schedule to the Agency by 06/07/2007 detailing how the Non-compliances and Observations specified therein are to be rectified. Please quote the above Inspection Reference Number in any future correspondence in relation to this Report. If you have any further queries please contact Liam Ó Súilleabháin at 094 904 48400.

1. SITE INSPECTION AND ASSESSMENT

The Site Inspection commenced at 10:40 and the following were in attendance:

Representing Bord na Móna

Brendan Moyle	Environmental Manager
Richard Cosgrave	General Manager

Representing the Environmental Protection Agency:

Liam Ó Súilleabháin	Inspector
Helen Boyce	Inspector

An inspection of the site was conducted, special attention was paid to machinery maintenance and servicing operations, road cleaning and surface water run-off, settlement pond maintenance, operation of the composite sampler and throttle, and peat deposition operations.

Interview

The following personnel were interviewed:

Name	Issue
Liam Chambers	Operation of the composite sampler
Brendan Moyle	Various

Documentation

The following documentation was requested for review:

Record	Comment
Silt pond daily visual inspection records	See Inspection Findings
Silt pond cleaning records	See Inspection Findings
Emissions to water monitoring results	See Inspection Findings
Waste intake records, 2007 to date	Satisfactory
Operator training with regard to operation of the surface water throttle	See Inspection Findings
Yard run-off daily inspection	See Inspection Findings
Peat reception road inspection	See Inspection Findings

General Comment

This unannounced inspection highlighted a number of environmental aspects concerning the operation and management of the activity which should be addressed urgently. It is of particular concern to the Agency that operator responsible for controlling the flow from the deposition bays to the settlement pond treatment system had not received any training in terms of operation of the treatment system. Oil handling and storage practises and the temporary service station were very unsatisfactory. Further measures to prevent run-off of solids from the haulage road adjacent to the temporary service station to the nearby stream should be put in place urgently.

The licensee was briefed on the Agency's reporting procedures and was advised that a Site Inspection Report would be issued.

2. INSPECTION FINDINGS

Inspection Non-Compliances

The site inspection process is a random sample on a particular day of a facility's compliance with some of its licence conditions. Where a non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

The licensee was found to be in non-compliance with the requirements of the Licence in respect of the following on the day of the Inspection (Schedule and Condition numbers refer to the Licence):

1. Materials Storage and Handling

At the temporary machine service station, several instances of storage of oil drums in unbunded areas were noted (See photographs, page 5).

This is in non-compliance with **CONDITION 13.1**.

Corrective Action Required

Provide adequate bunded storage capacity, put in place procedures and provide training to staff as necessary to ensure that all liquids other than water are stored in bunded areas at all times, so reduce the risk of surface water and ground water pollution.

2. Training and Awareness

Records of training provided to the operator/supervisor with responsibility for operating the surface water throttle and hence the flow to Settlement Pond SP3(A) and SP3(B) were not available for inspection. At the time of inspection, the entire flow was being diverted to Area 7 (controlled overflow zone) although flow through the throttle was very low.

This is in non-compliance with **CONDITION 2.2.2.6**

Corrective Action Required

Put in place procedures to ensure that all personnel whose work can have a significant impact on the environment receive appropriate training, and maintain appropriate records of same.

Inspection Observations

These Observations should be addressed or where relevant noted by the Licensee in order to ensure compliance and improve environmental performance of the facility. The actions taken should be reported back to the Agency.

1. Silt Pond Visual Inspection and Cleaning

While the depositional area was not operational in 2006, the inspectors noted that settlement ponds had not been cleaned in 2007 to date. The inspectors also noted that the discharge from SP2(A) and SP2(B) was strongly coloured (brown). Such colouration had also been recorded in the daily visual inspection log since operations recommenced in April 2007.

Corrective Action Required

The Agency reminds the Licensee of the requirements of Condition 8.9.6 (ii) with regard to pond cleaning as inspections dictate. Review the findings of the daily visual inspection of the silt ponds

and carry out desilting of the ponds as necessary.

2. Programme for Public Information

The inspectors noted that the emissions to water results for the period March 2007 to date were available electronically only and therefore not readily accessible to the public.

Corrective Action Required

The Licensee should maintain records of environmental performance in a format that is readily accessible to the public. Up-to date environmental monitoring results should be available to the public at all reasonable times

3. Routine Environmental Inspections

A number of daily inspections logs including inspection of the site access road and yard run-off had not been completed for 7/6/2007 and 8/6/2007 due to staff absence.

Corrective Action Required

The Licensee should put in place procedure(s) to ensure that trained personnel are available to carry environmental inspection as required.

4. Vehicle Wheel-Wash Facility

It was observed that a number of lorries were not being adequately washed because the driver did not exercise due care in parking the vehicle within the wheel wash area, and/or did not avail of the full wash cycle

Corrective Action Required

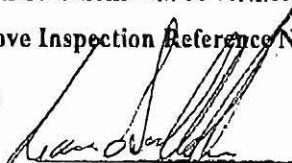
The Licensee should be in place procedure(s) to ensure that the wheel wash is operated satisfactorily so as to ensure that all vehicles exiting the site are adequately washed.

3. FOLLOW-UP ACTIONS

The licensee shall take the actions required to close out the Non-compliances and Observations raised in this Site Inspection Report. These actions will be verified during subsequent Inspections.

Please quote the above Inspection Reference Number in any future correspondence in relation to this Report.

Report prepared by
Inspector:



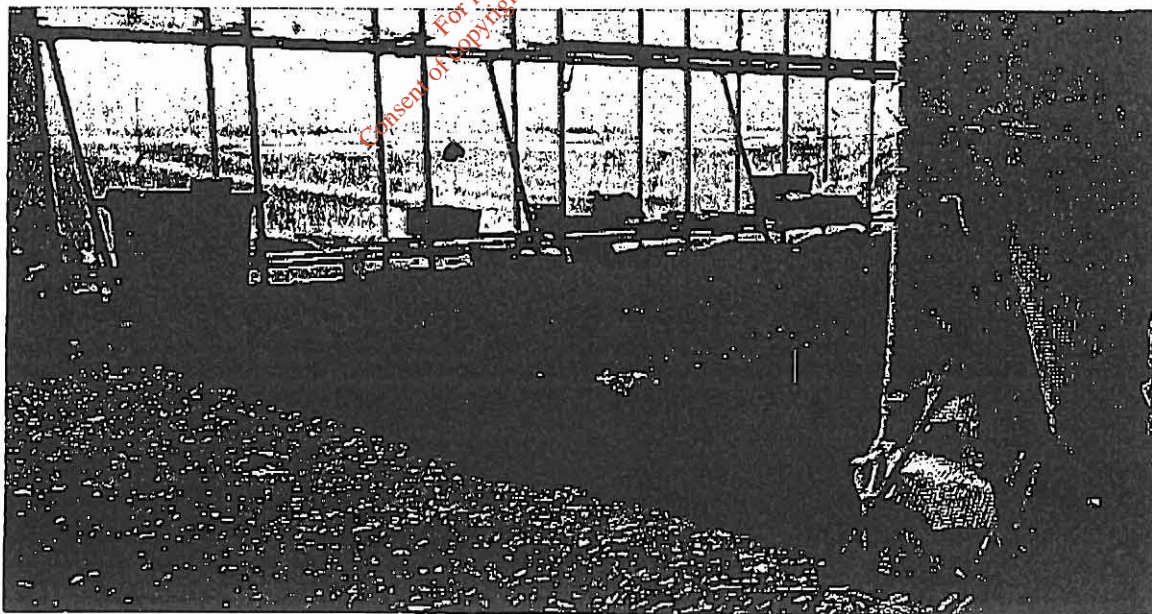
Date:

22/6/2007

For inspection purposes only. Consent of copyright owner required for any other use.



Photograph No 1: Storage of drums of oil at the temporary machine servicing station



Photograph No: 2: Unbundled storage of liquids at the temporary machine servicing station

EPA Site Inspection Corrective Action Schedule

Inspection Non-Compliances:

1. Materials Storage and Handling

Corrective Action:

Barrels moved to container, staff notified etc

2. Training and Awareness

Corrective Action:

Supervisor notified of Non-Compliance. Forecasts from Met Eireann checked daily, and throttle adjusted allow for retention in the swale and automatic discharge to Area 7. Observations noted on file and throttle checked daily and adjusted according to weather forecasts etc

Inspection Observations:

1. Silt Pond Visual Inspection and Cleaning.

Corrective Action:

Check silt pond inspections records. Include details of when pond was last cleaned and if it is recorded etc.

2. Programme for Public Information

Corrective Action:

Results will be e-mailed from head office on a weekly basis and stored as hard copies on file for public access.

3. Routine Environmental Inspections

Corrective Action:

Comment here on inspection frequency to date, and that if the supervisor is on leave the Environmental coordinator will take over these duties on that day.

For inspection purposes only.
Consent of copyright owner required for any other use.

4. Vehicle Wheel-Wash Facility

Corrective Action:

Comment here on the operation of the wheel wash and the lack of complaints about dirt on the road. Maybe put up a notice for drivers to remain in the wash until the cycle is over???

For inspection purposes only.
Consent of copyright owner required for any other use.