

Mr Mark Conroy

Tobin Consulting Engineers
Block 10-4
Blanchardstown Corporate
Dublin 15

15/09/2009

W0199-02

re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

Dear Mr Conroy,

I am to refer to the above referenced application for a waste licence relating to a facility at Srahmore Peat Deposition Site, Srahmore and Attavally, Bangor-Erris, County Mayo. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 and Article 13 of the Waste Management (Licensing) Regulations.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed below:

ARTICLE 12 COMPLIANCE REQUIREMENTS

1. Surface water:

Clarify whether the locations for monitoring surface water and surface water run-off during the initial site investigation (October 2003), are the same as those detailed in this waste licence application (Reg. No. W0199-02), and those monitoring points used under Waste Licence Reg. No. W0199-01 (i.e. identified in the Annual Environmental Reports).

Submit a map/maps clearly identifying the locations of all surface water monitoring points.

Provide an assessment of the upstream and downstream monitoring data and determine the impact, if any, of the previous operations of the facility (under

Waste Licence Reg. No. W0199-01) on surface water. The monitoring data for the periods prior to the commencement of the peat deposition activities, during peat deposition activities and after completion of the peat deposition activities should be considered in this assessment. This assessment should take account of the European Communities Environmental Objectives (Surface Waters) Regulations 2009 and should address, inter alia, water quality levels for suspended solids and ammonia.

Clarify when the monitoring data included in table 9.3 of the EIS was taken. Provide an explanation for why the levels of microbiological parameters are higher in SW1, SW2 and SW3 than in SW4, SW5 and SW6.

Provide an explanation for the peaks of ammonia (circa 0.1 mg/l) in the Munhin River recorded downstream of the main discharge point in 2005 and 2006, when upstream levels circa 0.02 mg/l were recorded (ref. figures of ammonia levels in Munhin River in 2005 and 2006 AERs included in EIS Appendix 9). Similarly provide an explanation for the peak in suspended solids identified in March 2006.

Complete a summary of all non-compliances with the surface water emission limit values under Waste Licence Reg. No. W0199-01, identify how these incidents were addressed and what mitigation measures will be undertaken to ensure such non-compliances do not recur.

2. Groundwater:

Submit a map/maps clearly identifying the locations of all groundwater monitoring points – those used in the original site investigation (October 2003), those identified in monitoring carried out under the terms of Waste Licence Reg. No. W0199-01 (referred to in the Annual Environmental Reports) and those used in the W0199-02 waste licence application.

Provide an assessment of the impact, if any, of the operations of the facility on groundwater during its operation in accordance with Waste Licence Reg. No. W0199-01. The monitoring data for the periods prior to the commencement of the peat deposition activities, during peat deposition activities and after completion of the peat deposition activities should be considered. This assessment shall consider the Agency's Publication *Towards Setting Guideline Values for the Protection of Groundwater in Ireland, Interim Report*, and shall compare groundwater quality levels on a year on year basis as well as with the baseline data.

3. Submit a site boundary map (boundary identified in colour) on one A3 drawing.
4. Submit a response to Section D.1(j) of the Waste Licence application form in line with the Agency's *Waste Licensing Application Guidance Notes 2005*.



5. Submit details of the waste inspection and acceptance procedures in line with the Agency's *Waste Licensing Application Guidance Notes 2005*.
6. Confirm whether or not the licence applicant has been convicted of an offence under any environmental legislation, e.g. the Waste Management Acts, 1996 – 2008, the Environmental Protection Agency Acts, 1992 – 2007, the Local Government (Water Pollution) Acts 1977 – 1990, etc.

ARTICLE 13 COMPLIANCE REQUIREMENTS

1. Surface water:

Clarify whether the locations for monitoring surface water and surface water run-off during the initial site investigation (October 2003), are the same as those detailed in this waste licence application (Reg. No. W0199-02), and those monitoring points used under Waste Licence Reg. No. W0199-01 (i.e. identified in the Annual Environmental Reports).

Submit a map/maps clearly identifying the locations of all surface water monitoring points.

Provide an assessment of the upstream and downstream monitoring data and determine the impact, if any, of the previous operations of the facility (under Waste Licence Reg. No. W0199-01) on surface water. The monitoring data for the periods prior to the commencement of the peat deposition activities, during peat deposition activities and after completion of the peat deposition activities should be considered in this assessment. This assessment should take account of the European Communities Environmental Objectives (Surface Waters) Regulations 2009 and should address, inter alia, water quality levels for suspended solids and ammonia.

Clarify when the monitoring data included in table 9.3 of the EIS was taken.

2. Groundwater:

Submit a map/maps clearly identifying the locations of all groundwater monitoring points – those used in the original site investigation (October 2003), those identified in monitoring carried out under the terms of Waste Licence Reg. No. W0199-01 (referred to in the Annual Environmental Reports) and those used in the W0199-02 waste licence application.

Provide an assessment of the impact, if any, of the operations of the facility on groundwater during its operation in accordance with Waste Licence Reg. No. W0199-01. The monitoring data for the periods prior to the commencement of the peat deposition activities, during peat deposition activities and after



completion of the peat deposition activities should be considered. This assessment shall consider the Agency's Publication *Towards Setting Guideline Values for the Protection of Groundwater in Ireland, Interim Report*, and shall compare groundwater quality levels on a year on year basis as well as with the baseline data.

Your reply to this notice should include a revised non-technical summary (Application Form and EIS) which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Please supply the information in the form of a one (1) original plus one (1) copy in hardcopy format within four weeks of the date of this notice. In addition submit sixteen (16) copies of the requested information to the Agency in electronic searchable PDF format on CD-ROM. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is **W0199-02**. Please direct all correspondence in relation to this matter to Administration, *Licensing Unit, Office of Climate, Licensing & Resource Use, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,

Mr John McEntagart

Inspector

Office of Climate, Licensing & Resource Use