Appendix A.1

NON-TECHNICAL SUMMARY

IPPC Licence Application Westland Horticulture Ltd.

Project Ref: OES1182_01

1. Company Profile & Operational Information

Westland Horticulture Ltd. (herein referred to as Westland) applied to the Agency for activities which fall under Class 1.4. of the First Schedule of the EPA Act 1992 for the activity involving *minerals and other materials.*

The application is made in respect of the *extraction of peat in the course of business which involves an area exceeding 50 hectares* which involves areas at Lower Coole, Mayne, Ballinealoe & Clonsura, Near Coole & Fineagh, County Westmeath, Westmeath.

The peat extraction operations have been in existence over a period of 30 years. Westland took over occupation of the site in the mid 1990's with the aim of producing milled peat for use in the horticultural industry.

The peat lands in County Westmeath comprise of 4 separate holdings situated in the townlands of Mayne, Ballinealoe & Lower Coole near the village of Coole and at Clonsura near Fineagh in County Westmeath. These bogs are all managed by the same Peat Harvesting Manager and are operated by the same plant and the same Peat Harvesting operatives.

Site Operations

The proposed works comprise peat milling operations which are undertaken for 3-4 months of the year and is largely weather dependant. Peat milling operations are only undertaken when the weather is warm and dry.

The operations of milling, harrowing, ridging and harvesting are repeated for each crop and are collectively described as a cycle. Generally at least 12mm of evaporation is required to dry a crop to the target moisture content. This normally takes a period of 3 to 4 days. In an average year 12 crops or production cycles are achieved. However, due to the undependable nature of our summer weather, the number of crops produced varies considerably from year to year.

Milling

Milling is undertaken by a tractor and harrow to cut and loosen up the fresh layer of peat (15mm deep) from the surface. Production of milled peat is carried out on drained bogs, generally during the months of April through September, in periods of good drying weather. The milled peat is left to air dry over a period of a few days.

Drying and Harrowing

To facilitate even drying of the crop it is rotated mechanically during the drying stage. The number of rotations is dependant on the climatic conditions and moisture in the crop. This is achieved with a machine called a harrow which loosens up the pore structure and exposes a fresh layer of peat to the air. A harrow comprises turning equipment which are towed behind a tractor. The spoons

turn down the dry surface of the peat layer and expose the wet peat underneath to the sun and air to assist the drying process.

Ridging

Once the peat has reached the target water content it is collected into ridges or drills. This is done with a ridger, a machine consisting of a series of blades in the shape of a V that span the full width of the field. The blades are towed by a tractor and push the peat to the centre of the ridge.

Drawing & Stockpiling

The dried fresh peat is removed from the bog to a designated stockpiling area where it is compacted into layers to prevent dust emissions, and is stored for transportation off the site.

Bog Maintenance Operations

A thin layer of peat from the bog surface is removed each year. To maintain an effective drainage network the drains have to be deepened, or ditched. This is normally undertaken after production in the Autumn and again prior to production in the Spring. The ditcher machine is lowered into the drain and removes peat from the bottom and sides of the drain. The peat or spoil removed is transferred in to another field where it dries and hardens. Fields are also shaped with graders or screw levellers to permit run-off of rainwater and good collection of the milled peat layer during production.

Environmental Management System

Westland has a detailed Environmental Management System (EMS) which is accredited to ISO 14001. This system is based on continual improvement and will be updated to implement the requirements of the IPPC Licence.

As part of the EMS the management and responsibility for the operation and control of all abatement/treatment systems on-site are maintained to reduce impacts on the environment.

Controls are in place for peat harvesting operations, inspection and emptying of silt traps, and emergency procedures have been prepared in the unlikely event that a

pollution incident occurs to minimise risk to the bog and nearby watercourses

Hours of Operation

The proposed hours of operation of peat Harvesting will be from 8 a.m.- 8 p.m. Monday through to Saturday; and seasonally from May through to September.

There may be additional time required to load trucks from our stockpiles in October to April as demand and weather permits.

Management Structure

Westland has a structured management approach to the operation of the business in terms of product quality, process control, environment, safety, and training. Training of personnel is a key function in the successful harvesting operations.

The Environmental Manager, Mark Hamill, will have the overall responsibility for the management of the Integrated Pollution Prevention Control license and originating all Environmental management plans, policies & Procedures. The Environmental Manager will also operate the Environmental management System to ISO14001 international standard.

He is supported by the site Operations Manager, Shane Currie, for the Peat Harvesting Operations. The Operations Manager has over 20 years experience working in the Peat Harvesting Industry with a wealth of experience on optimisation of silt trap designs and cleaning regimes and also experience on Best Available Techniques and practises for operating the peat Harvesting area particularly with regards to minimising the impact of transportation and stock piling within the Bog areas.

The Operations Manager has responsibility for day-to-day environmental management of the harvesting sites to ensure that the requirements of ISO14001 are implemented and maintained.

All employees received environmental training with respect to site harvesting operations.

The environmental performance objectives and consequent targets are set on an annual basis with the objective of minimising and, wherever possible, eliminating adverse effects and meeting policy requirements. Increasingly stringent targets are established each year. The programme is reviewed and changed as required.

Emissions to Atmosphere

There are no significant point source emissions to atmosphere at the Westland sites. The principal fugitive emissions to atmosphere at the sites dust.

As part of the Licence application Westland proposed to install a dust monitoring device at both of the sites.

Westland has developed and implemented fugitive dust emissions control measures to help minimise and contain as far as practicable dust arising from development and harvesting operations. As part of the Environmental Programme there is an objective for the *reduction of fugitive dust emissions during loading and transfer operation on the bog and during unloading operations at the tipper and works yard areas.*

Dust levels at the facility will be monitored to asses compliance in accordance with EPA recommended guidelines of 350mg/m2/day.

Emissions to water

The primary emissions to water associated with peat harvesting are discharges arising from the bog surface water drainage ditches. Drainage of the bogs is necessary to reduce the moisture content and the drainage network also provides collection of surface water run-off.

Drains are typically located every 16-17 metres and these field drains feed into sedimentation basins. Prior to discharge to the ultimate receiving waterbodies, they typically undergo treatment within the sedimentation basins. The primary function of the silt sedimentation basins is the

removal of suspended solids. They area cleaned and maintained c. twice per year, and more frequently if deemed necessary, and significantly reducing suspended solids in surface water discharges.

There are currently 7 sedimentation basins located in the Coole/Ballinealoe/Mayne harvesting site. And 4 sediment ponds located in the Clonsura with the proposed installation of another sedimentation basin on receipt of the IPPC Licence.

Four of the sedimentation basins (No.'s1-4) at Mayne discharge to the River Inny post treatment, while three of the sedimentation basins (No.'s 5-7) discharge into an Office of Public Works drain post treatment prior to entering the River Inny.

Two of the sedimentation basins (No.'s 1and 2) at Clonsura discharge to the River Inny post treatment, while two other sedimentation basins (No.'s 3 and4) discharge to the River Glore post treatment circa 500m from the River Inny.

Surface water monitoring and analysis undertaken on the discharges from the sedimentation basins at Westlands have demonstrated the effectiveness of the sedimentation basins at removal of sediment from surface waters. Results recorded for suspended solids range from 2-16.8mg/l.

Waste Management

The primary hazardous wastes which require disposal/recovery by hazardous waste contractors include waste oils, oil filters, batteries and anti-freeze. Non-hazardous wastes generated include scrap metal and polythene (from stockpile protection), and silt from the silt sedimentation ponds which is spread on bog a minimum of 3 meters from the sedimentation basins.

Groundwater

Westland manage & control the site operations to ensure that no potentially polluting substance or matter shall be permitted to discharge to off surface waters, off site storm drains or groundwater's.

The primary risks to groundwater is refuelling of harvesting vehicles by mobile refuelling units. In order to prevent the potential for groundwater pollution the following steps are undertaken in accordance with work instruction WI20/04 .

i. Refuelling vehicles need to be bunded to ensure no leaks can occur.
ii. We will maintain in storage an adequate supply of containment booms and or suitable absorbent material (spill kits) on site at all times.
iii. Absorbent materials (spill kits) are to be held on standby in all instances of refuelling.
iv. A visual inspection will be completed every week to ensure that there is No evidence of fuel contamination in silt ponds or outlets.
v. Any contaminated peat shall be removed and deposited in a contaminated waste container and disposed of by licensed waste hauliers.
vi. A bi-annual inspection shall be carried out of all transported fuelling systems to ensure that should record any damages leaks or flaws that could result in an accidental spillage.

Noise

No noise complaints have been received by Westland with respect to operations associated with this application. The most dominant noise emissions will arise during peat harvesting operation.

Noise levels at the facility will be will be monitored to asses compliance in accordance with EPA recommended guidelines of daytime 55 Leq (dBA) and night time 45 Leq (dBA) at noise sensitive locations.

Monitoring and Sampling

Surface water, dust, and noise monitoring are proposed to be undertaken to assess the impact of activities at the site on the environment. These monitoring operations will be carried out during the operational life of the facility according to the licence issued by the Agency.

Best Available Technology (BAT)

Westland will employ site practices and best available technology in accordance with BAT principles to avoid any environmental pollution and prevent and mitigate any nuisance emissions from the facility.

Appropriate Assessment

OES undertook an Appropriate Assessment (AA) Screening Report and Natura Impact Statement of Westland Horticulture Ltd. operations to assess the potential impacts, if any, on nearby sites with European Conservation designations (i.e. Natura 2000 sites) in accordance with Article 6 of the Habitats Directive.

The screening assessment was undertaken on all Natura 2000 sites located within a 15km radius of the proposed works. The screening assessment identified 1 site, Lough Derravaragh, which could potentially be impacted by Westland Horticultures site operations.

A Natura Impact Statement (NIS) was prepared to assess the potential impacts from Westland Horticulture Ltd. operations on Lough Derravaragh both on their own and in combination with other plans and projects. The assessment particularly focused on water quality, and disturbance associated with dust and noise emissions.

The NIS concludes that, given the scale and nature of Westland's operations, they will not have any significant negative impacts on their own, or in combination with other plans and projects on Natura 2000 sites site or annexed species if proposed control measures are implemented.

The Environmental Protection Agency having satisfied itself that the Natura Impact Statement is complete and objective will undertake the Appropriate Assessment on the basis of the Statement and any other necessary information

Fit and Proper Person

Westland has one historical prosecution relating to a water pollution incident. Since the incident Westland have implemented a number of site control measures to ensure regular maintenance and monitoring of onsite sediment basins. In addition Westland developed a detailed Environmental Management System which is accredited to ISO14001.

Mark Hamill will be responsible for Environmental & Peat Harvesting operational responsibilities and Jarlath Quinn Financial responsibilities. Neither the relevant persons have ever been convicted under the PoE Act, the Waste Management Act 1996, the Local Government (Water pollution) Acts1977 and 1990 or the Air Pollution Act 1987 and are considered fit & proper persons nominees.

Members of the management team have considerable experience in the environmental management. Mark Hamill (B.Sc. Environmental Science) will be responsible for the Environmental Management of the site. Mark will oversee the implementation and management of the site's Environmental Management Plan which is accredited to ISO 14001 and will be managed to achieve compliance with the IPPC Licence.

The Environmental Manager will be supported in his role by the Operations Manager Shane Currie, who has over 20 years experience working in the Peat Harvesting Industry.
The Operations Manager has responsibility for day-to-day environmental management of the harvesting sites to ensure that the requirements of ISO14001 are implemented and maintained.

Westland is in a good financial standing as detailed as detailed in Attachment L.2. the application. Westland will ensure there is adequate insurance which will cover accidental pollution events. They also propose to prepare a Residual Management Plan and a costed Environmental Liabilities Risk Assessment for the sites.