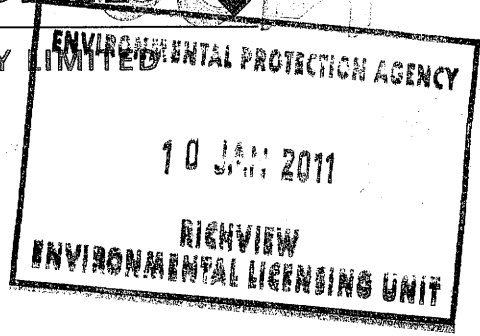
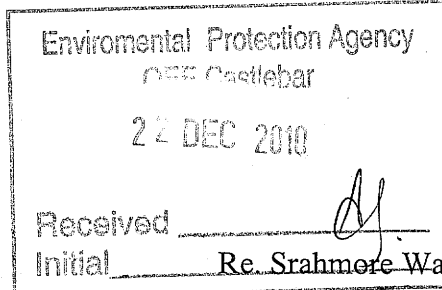


BORD NA MÓNA

BORD NA MÓNA ENERGY LIMITED



Michael Henry
Office of Environmental Enforcement
Environmental Protection Agency
John Moore Rd.
Castlebar
Co Mayo



21 December 2010

Ref: W199-2/Srah080

Dear Mr. Henry

In relation to Condition 3.17 of the Srahmore Waste Licence, we are seeking to agree a change to this condition, as permitted.

Condition 3.17 states:

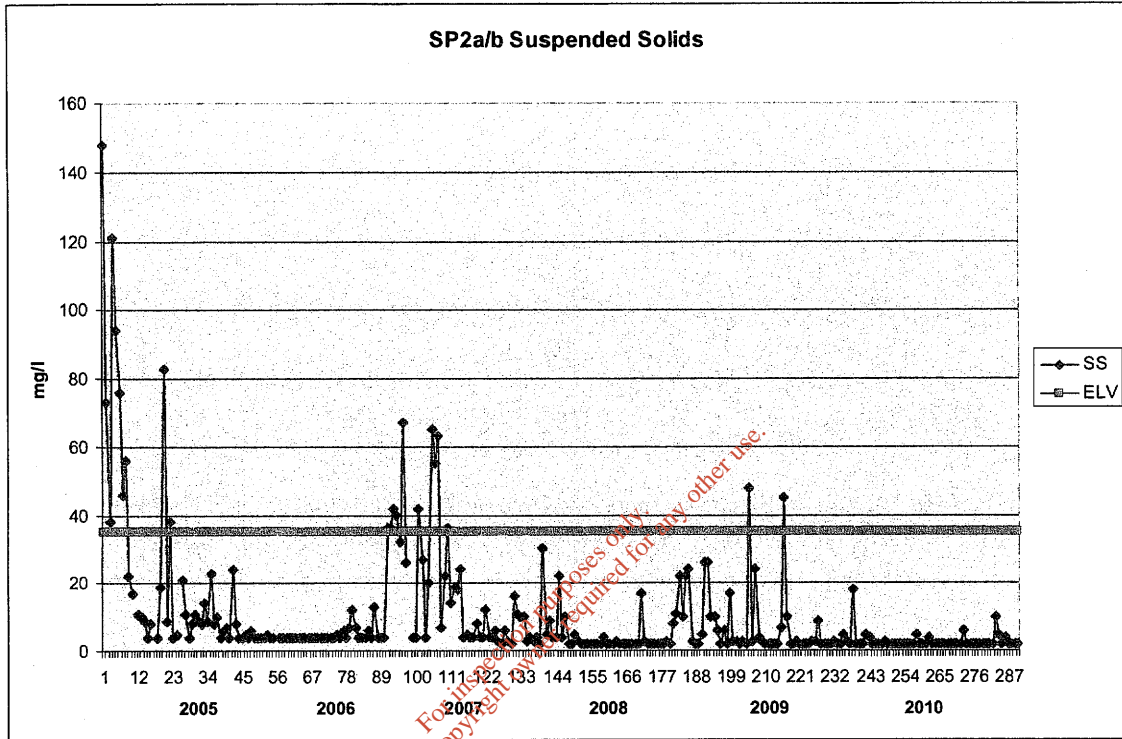
Flow regulators shall be fitted to the inlets to all silt ponds to ensure the design flow capacity of the ponds is not exceeded in flood events. Flows in excess of the design capacity of the ponds shall be discharged to the Area 7 controlled overflow zone, or as otherwise may be agreed by the Agency.

There are five silt pond systems in operation in Srahmore. Three are located and designed to treat run-off from the peat deposition site (S5-1, S5-2 and SP3a & 3b), one is for treating the final effluent from the grit traps and oil interceptors (SP2a/b) and the final one (SP1) treats clean non-process water (see attached map.)

This condition requires the installation of flow restrictors on these ponds, with excess flow diverted to the Controlled Overflow Area (Area 7).

1. In relation to SP1, this is non process water and the installation of a flow restrictor and diversion of the excess water to Area 7 is not possible due to its location.
2. In relation to SP2a/b, this is for treating the final effluent from the grit trap and oil interceptor. This too, is remote from Area 7 and would require the installation of a pump, 500 metres of piping and associated civil works to enable this. This silt pond discharges to the internal outfall before leaving the site via SW4 and receives further treatment in an additional silt pond at SW104, outside the site boundary, before entering the Munhin River.

- While this silt pond system does not have an ELV attached, we have been taking weekly samples from this silt pond system since peat deposition commenced in April 2005 and 93% have been under 35mg/l. Of the 7% that exceeded 35mg/l, 2.7% occurred in the weeks following the completion of the construction phase in early 2005.



- In relation to S5- 1 and S5-2, we can install flow restrictors as these will back up the flow to the swale which discharges to Area 7.
- In relation to SP3a and b, there is a flow restrictor in the swale box which has been manually utilised since 2005, to divert stormwater to area. This is at the 525mm dia pipe (see map) and can be set to achieve the required design flow.

All of these silt pond systems either discharge through Location 7 (SW4) or SW100 and SW101, which have had the following level of compliance during deposition in 2005 and 2007 and rehabilitation in 2007 to 2010.

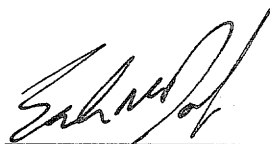
Year	Compliance
2005	97.7%
2006	100%
2007	97%
2008	99.7%
2009	100%
2010	99.7% to date

The level of peat deposition in 2011/2012 is projected to be between 10,000 and 40,000 tonnes, which is less than 10% of the total deposited during 2005 and 2007. All of the peat will be deposited in all of Bay 1 and the lower half of Bay 2.

In summary, we are requesting that the requirement to install flow restrictors to all silt ponds be restricted to a requirement to only install flow restrictors on silt ponds where the restricted water can be conducted to the controlled over flow area 7, which would be S5-1 and S5-2. There is a restrictor already in-place for SP3a/b.

If you require further information to support this request, please let me know.

Yours sincerely



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