



OF

This report has been cleared for submission to the OCLR Director by the Programme Manager

F.Clinton
Signed *Maifay*

Date 14/04/2011

LICENSING & RESOURCE USE

MEMORANDUM

TO:	LAURA BURKE, DIRECTOR
FROM:	John McEntagart
C.C:	Frank Clinton
DATE:	14 th April 2011
RE:	Technical Amendment to Licence Register Number W0199-02, held by Bord na Mona Energy Limited

Introduction

Bord na Mona Energy (BnM) Limited has requested, in correspondence received 10/01/2011, a technical amendment to Waste Licence Reg. W0199-02 in order accommodate the following:

To clarify those silt ponds that must be fitted with flow regulators.

Background

Bord na Mona Energy Limited is a peat disposal facility located at Srahmore and Attavally, Bangor-Erris, County Mayo. The installation is licensed under Classes 1, 4 and 13 of the Third Schedule to the Waste Management Acts 1996 - 2010. Bord na Mona Energy Limited was originally granted a Waste licence on 29/10/2004. A revised licence, Reg. No. W0199-02, was granted on 27/07/2010.

Condition 3.17 requires flow regulators to be fitted to the inlets of all silt ponds to minimise flow through the silt ponds during flood events and prevent wash out, and the diversion of overflows to the controlled overflow zone. 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 at the facility. Three are located in and treat runoff from the peat deposit area (PDA), one (SP2a/b) treats effluent from the grit traps and oil interceptors that handle run-off from the peat reception/service area, and the fifth (SP1) treats run-off from un-worked bogs on either side of the road connecting the site entrance to the service area.

Reason for request for Technical Amendment

The licensee has requested the requirement to fit flow regulators to the silt ponds be limited to those silt ponds in the peat deposit area only. The licensee argues that the installation of a flow restrictor and diversion of the overflow is not possible for the silt ponds outside the peat deposit area, because of their remote locations from the controlled overflow zone and such diversion of overflows would require significant civil works. The licensee also states that while no emission limit value is imposed on SP2a/b, emissions monitoring indicates it is largely compliant (93%) with the emission limit values imposed on the silt ponds at the peat deposit area (35 mg/l suspended solids).

Assessment of request for Technical Amendment

The purpose of Condition 3.17 is to prevent wash-out of suspended solids at the silt ponds in the peat deposit area during storm events. It was not intended to control the silt ponds at the service area and at the site access road adjoining un-worked bogs where the risk associated with wash-out is much lower. These silt ponds (SP2a/b and SP1) do not treat run-off from worked-out bogs, and hence the sedimentation risk is lower.

In addition, emissions from SP2a/b are controlled through Condition 3.20, which states:

3.20 Silt Traps and Oil Separators

The licensee shall install and maintain silt traps and oil separators at the facility to ensure that all storm water discharges from the service, peat reception and waste quarantine areas pass through a silt trap and oil separator in advance of discharge. The separator shall be a Class I full retention separator and the silt traps and separator shall be in accordance with I.S. EN-858-2: 2003 (separator systems for light liquids).

Accordingly, it is proposed to re-word Condition 3.17, to make it clear that the requirement for flow regulators and diversion of flows in excess of design capacity applies to the silt ponds in the peat deposit area only.

I have also contacted the relevant OEE inspector for the facility who is also in agreement with the proposed changes to the Condition.

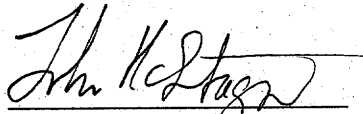
Recommendation:

For the reasons outlined above I recommend that the Agency agree to a technical amendment of the Bord na Mona Energy Limited Waste Licence (Reg. No. W0199-02) under Section 42B(1)(b) of the Waste Management Acts 1996 to 2010. In particular, the proposed new wording of Condition 3.17, with changes highlighted in bold, is:

*Flow regulators shall be fitted to the inlets **of all silt ponds servicing the peat deposit area**, 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.

Signed

A handwritten signature in black ink, appearing to read "John McEntagart", written over a horizontal line.

John McEntagart

Inspector

Environmental Licensing Programme