

APPENDIX 18.2
EPA Site Inspection Reports

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 9048400.

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
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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**

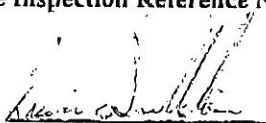
During the site tour, it was noted that considerable quantities of wet peat had accumulated in the field drains where deposition works were being carried out. All drains should be maintained free of excessive peat. In this regard, a sufficient number of access roads with suitable piping should be constructed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

3. FOLLOW-UP ACTIONS

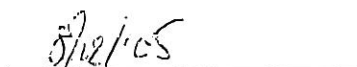
The licensee shall take the actions required to close out the non-compliances and observations raised in this Site Inspection Report. These actions will be verified during subsequent inspections.

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

Report prepared by
Inspector:



Date:



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.

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
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Castlebar, County Mayo, Ireland
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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

Inspection Reference No: (W0199-01)07SI03LOS

Date of Inspection: 11/06/2007

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

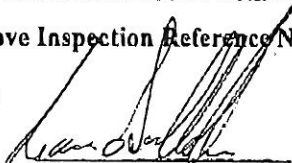
The Licensee should be in place procedure(s) to ensure that the wheel wash is operated satisfactorily so as to ensure that all vehicles exiting the site are adequately washed.

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.

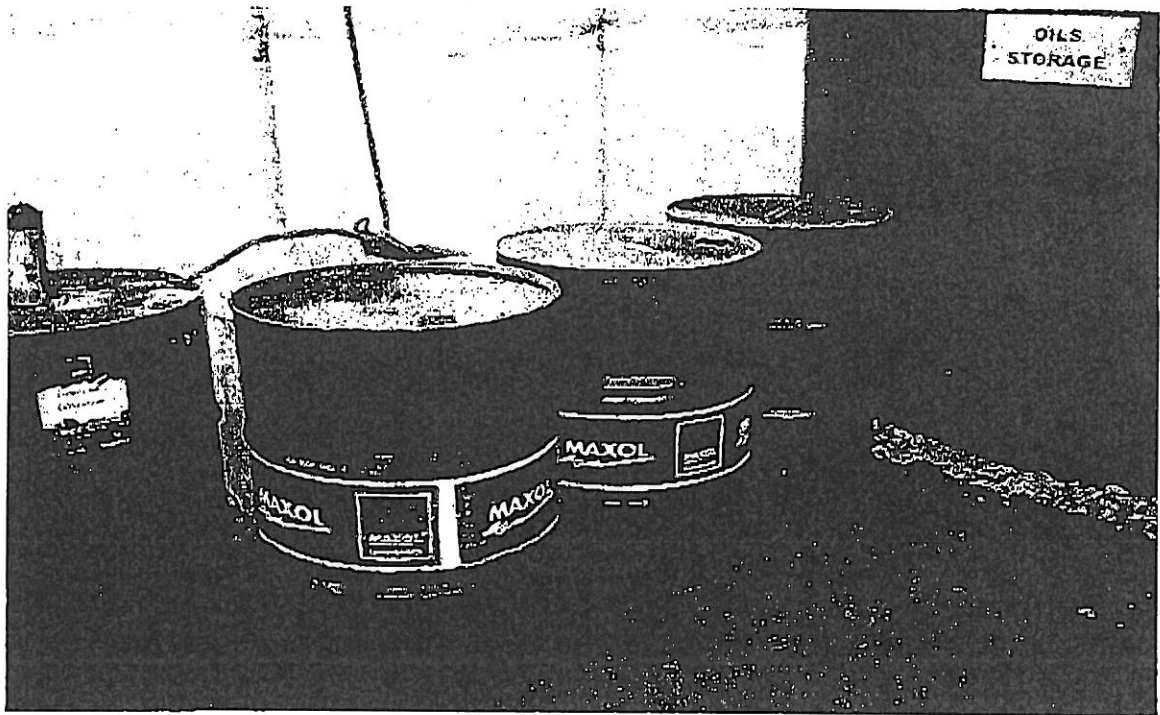
Please quote the above Inspection Reference Number in any future correspondence in relation to this Report.

Report prepared by
Inspector:

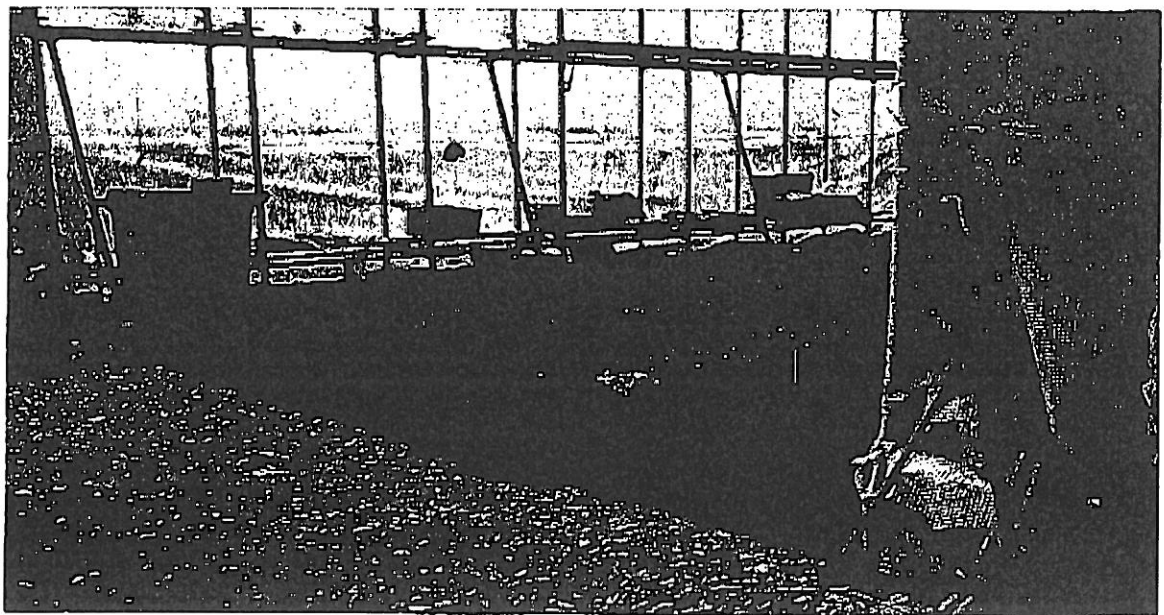


Date:

22/6/07



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



Photograph No: 2: Unbunded 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.

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???

Mr Enda McDonagh
Bord na Mona Energy Limited
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Tullamore
County Offaly

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25/11/2008

Our Ref: W0199-01 /nc05los.doc

Notification of Non-Compliance

Dear Mr McDonagh

Further to our site visit on 04/11/2008, the Agency has noted the Non-compliance with IPC Licence Reg. No. P0199-01, as detailed in the enclosed *Site Inspection Report*.

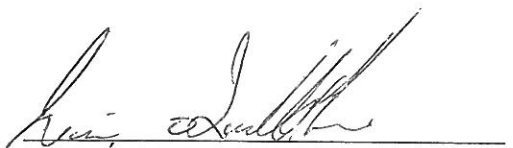
ACTION REQUIRED

In view of the above you are required to:

- Carry out the corrective actions specified therein
- Submit a schedule to the Agency as to how the non-compliance and observations specified therein are the rectified

Failure to comply with the requirements specified in this notification of non-compliance will lead to further enforcement action by the Agency. Please quote the above reference in future correspondence in relation to this matter. If you have any queries please contact Liam Ó Súilleabháin at 094 9048400.

Yours sincerely



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: 25/11/2008

Licence Register No: W0199-01

Inspection Reference No: (W0199-01)08SI04LOS

Date of Inspection: 04/11/2008

Inspectors: Liam Ó Súilleabháin

Field Technician: Cathal Ruane

Announced: Yes

This Site Inspection Report details the Agency's findings following an inspection of Bord na Mona Energy Limited on 04/11/2008.

NOTIFICATION OF NON-COMPLIANCE

Bord na Mona Energy Limited has been found to be in non-compliance with the conditions of the IPC Licence as set out in this Site Inspection Report. You are required to undertake the corrective actions specified to close out the Non-Compliance 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 by 09/12/2008 detailing how the non-compliance 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 9048400.

1. SITE INSPECTION AND ASSESSMENT

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

Representing Bord Na Móna

Enda McDonagh

Head of Environmental Engineering

Richard Cosgrave

Facility Manager

Representing the Environmental Protection Agency:

Liam Ó Súilleabháin

Inspector

Cathal Ruane

Field Technician

An inspection of the site was conducted, special attention was paid to, sampling of emissions to water, ongoing silt pond works and vegetation of the depositional area

Interview

The following representatives were interviewed during the Inspection:

Name	Position
Enda McDonagh	Head of Environmental Engineering
Richard Cosgrave	Facility Manager

Documentation

The following documentation was requested for review:

Record	Condition No.	Comment
Groundwater monitoring results, 2008	8.1	See Inspection Findings
Waste intake records 2007 to date	11.11	Satisfactory
Surface water monitoring , 2008	8.1	Satisfactory

General Comment

Waste acceptance at the site had ceased and therefore the risk of adverse environmental impact was lower. The licensee should, however, continue to carry out monitoring as specified in the licence, unless otherwise agreed with the Agency.

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 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. Groundwater Monitoring

Groundwater monitoring results for the first half of 2008 were not available for inspection. Enda McDonagh advised that such monitoring was not carried out this year to date, as it was considered not necessary given that the facility was not currently accepting waste. The Agency had not agreed to any proposed alteration to the monitoring frequency with respect to groundwater.

This is in non-compliance with **CONDITION 8.1**.

Corrective Action Required

Put in place procedures to ensure (ii) that monitoring as per Condition 8.1 of the licence is carried, unless otherwise agreed with the Agency, and (ii) all monitoring results are placed on the public file and available for inspection.

Inspection Observations

These observations should be addressed/noted by the licensee in order to ensure compliance and improve the environmental performance of the facility. The actions taken should be reported back to the Agency.

1. Operation of the composite sampler

On the day of inspection a composite sample of sufficient volume, was not available for collection by the Agency, due to recent adjustments of the machine flow rate in response to varying flow in the discharge ditch. Consequently split sampling to compare test results could not be carried out.

Corrective Action Required

Review the operation of the composite sampler, particularly, the flow rate and size of the sample container, so as to ensure that an appropriate volume of sample is consistently collected, irrespective of the flow rate in the discharge drain.

Put in place procedures to ensure that a composite sample is stored, as appropriate, and available for collection on-site by the Agency at all reasonable times.

2. Access to monitoring points

During the course of the site tour, it was noted that access to the surface water monitoring point, SW4 was not safe. In particular, the bridge across the discharge drain was found to be slippery, and no hand rail was in place.

Corrective Action Required

Put in place measures to provide and maintain safe and permanent access to all monitoring points

3. Weighbridge and wheel wash

It was noted that the above key infrastructure has been removed following cessation of waste filling.

Corrective Action

In the event that further waste is accepted at the site, the aforementioned infrastructure should be reinstated.

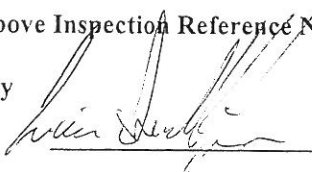
3. FOLLOW-UP ACTIONS

The licensee shall take the actions required to close out the non-compliance 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:

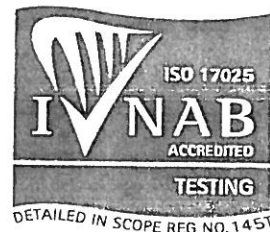
Date:



25/11/2008



Test Report



Report of: Analysis of landfill site sample(s)
Report to: Office of Environmental Enforcement, EPA.
Report date: 05/01/10

Licensee: **Bord na Mona Energy Limited**
Facility: **Srahmore Peat Deposition Site**
Srahmore and Attavally, Bangor-Erris, County Mayo
Reference No: **W0199-01**

Date collected: 08/12/2009

Date received: 08/12/2009

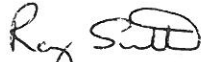
Comments:

- 1) All Metals Analysed in the EPA, Dublin Laboratory
- 2) Cyanide Analysed by Alcontrol Laboratories, Dublin
- 3) Phenolic Compounds Analysed by Alcontrol Labs.
- 4) TOC Analysed by Alcontrol Laboratories, Dublin
- 5) VOCs Analysed by EPA, Kilkenny
- 6) Solvents Analysed by EPA, Dublin
- 7) nm "Not measured"
- 8) nd "None detected"
- 9) nt "No time" - Time not recorded

- 10) nr "not reported"
- 11) no "none observed"
- 12) VOB "Visible On Bottom"
- 13) ntnc "Too numerous to count"
- 14) F "Field measured parameters"
- 15) Total Kjeldahl Nitrogen = Total Nitrogen - Total Oxidised Nitrogen
- 16) Colour Analysis: Hazen units = mg/l Pt Co
- 17) The scope and accuracy of the analysis is shown on the reverse side of each report sheet
- 18) (**) Indicates parameters / results produced from non-accredited analytical methods

Laboratory Ref:			2904179
Type of sample:			Surface Water
Sampling point:			Location 7
Sampled by:			Wayne Egan
Time Sampled:			14.10
Start/End - Dates of Analysis:			08-12-09/23-12-09
Status of results:			Final
Parameter	Units	Limits	
F ** Temperature	°C		8.2
B4 pH	pH Units		7.3
B5 Conductivity @25°C	µS/cm		177
B2 Biochemical Oxygen Demand	mg/l O ₂		1.2
B1 Chemical Oxygen Demand	mg/l O ₂		40
B7 Suspended Solids	mg/l	< 35	<8
B8 Total Dissolved Solids	mg/l		108
C1 Ammonia	mg/l N		0.18
C1 Nitrite (as N)	mg/l N		0.006
D1 Nitrate (as N)	mg/l N		0.23
** Total Phosphorus	mg/l P		0.03
** Fats, Oils & Greases	mg/l		<5

Signed:

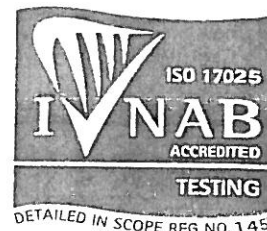


Date:

06/01/10

Ray Smith

Regional Chemist, EPA Castlebar



Test Report

Report of: Analysis of landfill site sample(s)
Report to: Office of Environmental Enforcement, EPA.
Report date: 05/01/10

Licensee: **Bord na Mona Energy Limited**
Facility: **Srahmore Peat Deposition Site**
Srahmore and Attavally, Bangor-Erris, County Mayo
Reference No: W0199-01

Date collected: 08/12/2009 Date received: 08/12/2009

Comments:

- 1) All Metals Analysed in the EPA, Dublin Laboratory
2) Cyanide Analysed by Alcontrol Laboratories, Dublin
3) Phenolic Compounds Analysed by Alcontrol Labs.
4) TOC Analysed by Alcontrol Laboratories, Dublin
5) VOCs Analysed by EPA, Kilkenny
6) Solvents Analysed by EPA, Dublin
7) nm "Not measured"
8) nd "None detected"
9) nt "No time" - Time not recorded
10) nr "not reported"
11) no "none observed"
12) VOB "Visible On Bottom"
13) tnc "Too numerous to count"
14) F "Field measured parameters"
15) Total Kjeldahl Nitrogen = Total Nitrogen - Total Oxidised Nitrogen
16) Colour Analysis: Hazen units = mg/l Pt Co
17) The scope and accuracy of the analysis is shown on the reverse side of each report sheet
18) (**) Indicates parameters / results produced from non-accredited analytical methods

			Laboratory Ref:	2904180	2904181	
			Type of sample:	Surface Water	Surface Water	
			Sampling point:	S5-1	S5-2	
			Sampled by:	Wayne Egan	Wayne Egan	
			Time Sampled:	14.30	14.45	
			Start/End - Dates of Analysis:	08-12-09/14-12-09	08-12-09/14-12-09	
			Status of results:	Final	Final	
Parameter	Units	Limits				
F ** Temperature	°C			7.9	7.0	
B4 pH	pH Units			5.8	5.4	
B5 Conductivity @25°C	µS/cm			126	119	
B1 Chemical Oxygen Demand	mg/l O2			40	47	
B7 Suspended Solids	mg/l			<8	<8	
C1 Ammonia	mg/l N			<0.03	0.05	

Signed:

Date:

08/01/10

Ray Smith
Regional Chemist, EPA Castlebar

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 Mórdha
Caisleán an Bharraigh, Contae Mhaigh Eo, Éire
T: +353 94 904 8400
F: +353 94 904 8499
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

13th December 2007

Our Ref: W0199-01/(07)GEN04AJ.doc

Dear Mr McDonagh

Please find enclosed results of the analysis carried out on samples taken from your facility on 19/11/07.

Please review and forward your comments, if any, to the Agency within five working days.

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

Yours sincerely



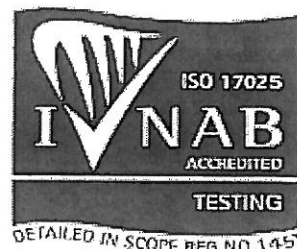
Office of Environmental Enforcement

Encls.





Test Report



Report of: Analysis of landfill site sample(s)
Report to: Office of Environmental Enforcement, EPA.
Report date: 11/12/07

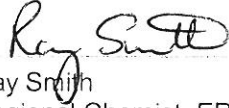
Licensee: **Bord na Mona Energy Limited**
Facility: **Srahmore Peat Deposition Site**
Srahmore, Attavally, Bangor-Erris
Reference No: W0199-01

Date collected: 19/11/2007 Date received: 19/11/2007
Comments:

- | | |
|---|--|
| 1) All Metals Analysed in the EPA, Dublin Laboratory | 9) nr "not reported" |
| 2) Cyanide Analysed by Alcontrol Laboratories, Dublin | 10) no "none observed" |
| 3) Phenolic Compounds Analysed by Alcontrol Labs. | 11) Intc "Too numerous to count" |
| 4) VOCs Analysed by EPA, Kilkenny | 12) F "Field measured parameters" |
| 5) Solvents Analysed by EPA, Dublin | 13) Total Kjeldahl Nitrogen = Total Nitrogen - Total Oxidised Nitrogen |
| 6) nm "Not measured" | 14) Colour Analysis: Hazen units = mg/l Pt Co |
| 7) nd "None detected" | 15) The scope and accuracy of the analysis is shown on the reverse side of each report sheet |
| 8) nt "No time" - Time not recorded | 16) (**) Indicates parameters / results produced from non-accredited analytical methods |

Laboratory Ref: 2704138 Type of sample: Surface Water Sampling point: Location 7 Sampled by: Wayne Egan Time Sampled: 12.30 Start/End - Dates of Analysis: 19-11-07/26-11-07 Status of results: Final		
Parameter	Units	Limits
F ** Temperature	°C	7.8
B4 pH @20°C	pH Units	6.5
B5 Conductivity @25°C	µS/cm	121
B2 Biochemical Oxygen Demand	mg/l O ₂	1.4
B1 Chemical Oxygen Demand	mg/l O ₂	109
B7 Suspended Solids	mg/l	< 35 41
B8 Total Dissolved Solids	mg/l	111
C1 Ammonia	mg/l N	0.11
C1 Nitrite	mg/l N	<0.005
D1 Nitrate	mg/l N	0.33
** Total Phosphorus	mg/l P	0.06
** Fats, Oils & Greases	mg/l	12

Signed:



Date:

11/12/07

Ray Smith

Regional Chemist, EPA Castlebar

Test Report

Report of: Analysis of landfill site sample(s)
Report to: Office of Environmental Enforcement, EPA.
Report date: 11/12/07

Licensee: **Bord na Mona Energy Limited**
Facility: **Srahmore Peat Deposition Site**
Srahmore, Attavally, Bangor-Erris
Reference No: W0199-01

Date collected: 19/11/2007 Date received: 19/11/2007

Comments:

- 1) All Metals Analysed in the EPA, Dublin Laboratory
2) Cyanide Analysed by Alcontrol Laboratories, Dublin
3) Phenolic Compounds Analysed by Alcontrol Labs.
4) VOCs Analysed by EPA, Kilkenny
5) Solvents Analysed by EPA, Dublin
6) nm "Not measured"
7) nd "None detected"
8) nt "No time" - Time not recorded
9) nr "not reported"
10) no "none observed"
11) Intc "Too numerous to count"
12) F "Field measured parameters"
13) Total Kjeldahl Nitrogen = Total Nitrogen - Total Oxidised Nitrogen
14) Colour Analysis: Hazen units = mg/l Pt Co
15) The scope and accuracy of the analysis is shown on the reverse side of each report sheet
16) (**) Indicates parameters / results produced from non-accredited analytical methods

Laboratory Ref:				2704139	2704140	
Type of sample:				Surface Water	Surface Water	
Sampling point:				S5-1	S5-2	
Sampled by:				Wayne Egan	Wayne Egan	
Time Sampled:				12.50	13.10	
Start/End - Dates of Analysis:				19-11-07/22-11-07	19-11-07/22-11-07	
Status of results:				Final	Final	
Parameter	Units	Limits				
F.. Temperature	°C			8.4	7.2	
B4 pH @20°C	pH Units			5.3	4.3	
B5 Conductivity @25°C	µS/cm			90	105	
B1 Chemical Oxygen Demand	mg/l O2			49	75	
B7 Suspended Solids	mg/l			<8	10	
C1 Ammonia	mg/l N			<0.03	0.20	

Signed:

Ray Smith
Ray Smith

Date:

11/12/07

Regional Chemist, EPA Castlebar

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 Mórdha
Caisleán an Bharraigh, Contae Mhaigh Eo, Éire

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W: www.epa.ie

LoCall: 1890 33 55 99

11th March 2008

Our Ref: W0199-01/(08)GEN05AJ.doc

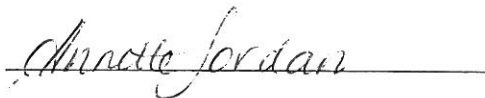
Dear Mr McDonagh

Please find enclosed results of the analysis carried out on samples taken from your facility on 21/02/08.

Please review and forward your comments, if any, to the Agency within five working days.

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

Yours sincerely



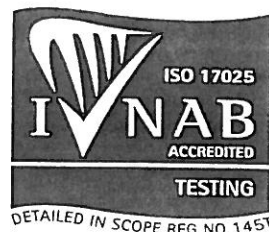
Office of Environmental Enforcement

Encls.





Test Report



Report of: Analysis of landfill site sample(s)
Report to: Office of Environmental Enforcement, EPA
Report date: 05/03/08

Licensee: **Bord na Mona Energy Limited**
Facility: **Srahmore Peat Deposition Site**
Srahmore, Attavally, Bangor-Erris
Reference No: W0199-01

Date collected: 21/02/2008

Date received: 21/02/2008

Comments:

- 1) All Metals Analysed in the EPA, Dublin Laboratory
- 2) Cyanide Analysed by Alcontrol Laboratories, Dublin
- 3) Phenolic Compounds Analysed by Alcontrol Labs.
- 4) VOCs Analysed by EPA, Kilkenny
- 5) Solvents Analysed by EPA, Dublin
- 6) nm "Not measured"
- 7) nd "None detected"
- 8) nt "No time" - Time not recorded

- 9) nr "not reported"
- 10) no "none observed"
- 11) Intc "Too numerous to count"
- 12) F "Field measured parameters"
- 13) Total Kjeldahl Nitrogen = Total Nitrogen - Total Oxidised Nitrogen
- 14) Colour Analysis: Hazen units = mg/l Pt Co
- 15) The scope and accuracy of the analysis is shown on the reverse side of each report sheet
- 16) (**) Indicates parameters / results produced from non-accredited analytical methods

			Laboratory Ref:	2800697
			Type of sample:	Surface Water
			Sampling point:	Location 7
			Sampled by:	Wayne Egan
			Time Sampled:	12.00
			Start/End - Dates of Analysis:	21-02-08/28-02-08
			Status of results:	Final
Parameter	Units	Limits		
F ** Temperature	°C		9.5	
B4 pH @20°C	pH Units		7.6	
B5 Conductivity @25°C	µS/cm		325	
B2 Biochemical Oxygen Demand	mg/l O ₂		1.7	
B1 Chemical Oxygen Demand	mg/l O ₂		35	
B7 Suspended Solids	mg/l	< 35	11	
B8 Total Dissolved Solids	mg/l		120	
C1 Ammonia	mg/l N		0.30	
C1 Nitrite	mg/l N		0.009	
D1 Nitrate	mg/l N		0.65	
** Total Phosphorus	mg/l P		0.06	
** Fats, Oils & Greases	mg/l		7	

Signed:  Date: 05/03/08
Ray Smith
Regional Chemist, EPA Castlebar



Test Report



Report of: Analysis of landfill site sample(s)
Report to: Office of Environmental Enforcement, EPA.
Report date: 05/03/08

Licensee: **Bord na Mona Energy Limited**
Facility: **Srahmore Peat Deposition Site**
Srahmore, Attavally, Bangor-Erris
Reference No: **W0199-01**

Date collected: 21/02/2008

Date received: 21/02/2008

Comments:

- 1) All Metals Analysed in the EPA, Dublin Laboratory
- 2) Cyanide Analysed by Alcontrol Laboratories, Dublin
- 3) Phenolic Compounds Analysed by Alcontrol Labs
- 4) VOCs Analysed by EPA, Kilkenny
- 5) Solvents Analysed by EPA, Dublin
- 6) nm "Not measured"
- 7) nd "None detected"
- 8) nt "No time" - Time not recorded

- 9) nr "not reported"
- 10) no "none observed"
- 11) tntc "Too numerous to count"
- 12) F "Field measured parameters"
- 13) Total Kjeldahl Nitrogen = Total Nitrogen - Total Oxidised Nitrogen
- 14) Colour Analysis: Hazen units = mg/l Pt Co
- 15) The scope and accuracy of the analysis is shown on the reverse side of each report sheet
- 16) (**) Indicates parameters / results produced from non-accredited analytical methods

			Laboratory Ref:	2800697
			Type of sample:	Surface Water
			Sampling point:	Location 7
			Sampled by:	Wayne Egan
			Time Sampled:	12.00
			Start/End - Dates of Analysis:	21-02-08/28-02-08
			Status of results:	Final
Parameter	Units	Limits		
F .. Temperature	°C			9.5
B4 pH @20°C	pH Units			7.6
B5 Conductivity @25°C	µS/cm			325
B2 Biochemical Oxygen Demand	mg/l O ₂			1.7
B1 Chemical Oxygen Demand	mg/l O ₂			35
B7 Suspended Solids	mg/l	< 35		11
B8 Total Dissolved Solids	mg/l			120
C1 Ammonia	mg/l N			0.30
C1 Nitrite	mg/l N			0.009
D1 Nitrate	mg/l N			0.65
** Total Phosphorus	mg/l P			0.06
** Fats, Oils & Greases	mg/l			7

Signed:  Date: 05/03/08
Ray Smith
Regional Chemist, EPA Castlebar



Test Report

Report of: Analysis of landfill site sample(s)
Report to: Office of Environmental Enforcement, EPA.
Report date: 05/03/08

Licensee: **Bord na Mona Energy Limited**
Facility: **Srahmore Peat Deposition Site**
Srahmore, Attavally, Bangor-Erris
Reference No: W0199-01

Date collected: 21/02/2008 Date received: 21/02/2008

Comments:

- 1) All Metals Analysed in the EPA, Dublin Laboratory
2) Cyanide Analysed by Alcontrol Laboratories, Dublin
3) Phenolic Compounds Analysed by Alcontrol Labs.
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9) nr "not reported"
10) no "none observed"
11) tnfc "Too numerous to count"
12) F "Field measured parameters"
13) Total Kjeldahl Nitrogen = Total Nitrogen - Total Oxidised Nitrogen
14) Colour Analysis: Hazen units = mg/l Pt Co
15) The scope and accuracy of the analysis is shown on the reverse side of each report sheet
16) (**) Indicates parameters / results produced from non-accredited analytical methods

			Laboratory Ref:	2800698	2800699	
			Type of sample:	Surface Water	Surface Water	
			Sampling point:	S5-1	S5-2	
			Sampled by:	Wayne Egan	Wayne Egan	
			Time Sampled:	11.05	11.35	
			Start/End - Dates of Analysis:	21-02-08/25-02-08	21-02-08/25-02-08	
			Status of results:	Final	Final	
Parameter		Units	Limits			
F	Temperature	°C		8.4	7.7	
B4	pH @20°C	pH Units		7.3	4.5	
B5	Conductivity @25°C	µS/cm		140	190	
B1	Chemical Oxygen Demand	mg/l O2		30	36	
B7	Suspended Solids	mg/l		<8	<8	
C1	Ammonia	mg/l N		<0.03	0.11	

Signed: Ray Smith Date: 05/03/08
Ray Smith
Regional Chemist, EPA Castlebar



Test Report

Report of: Analysis of landfill site sample(s)
Report to: Office of Environmental Enforcement, EPA.
Report date: 05/03/08

Licensee: **Bord na Mona Energy Limited**
Facility: **Srahmore Peat Deposition Site**
Srahmore, Attavally, Bangor-Erris
Reference No: W0199-01

Date collected: 21/02/2008 Date received: 21/02/2008

Comments:

- 1) All Metals Analysed in the EPA, Dublin Laboratory
2) Cyanide Analysed by Alcontrol Laboratories, Dublin
3) Phenolic Compounds Analysed by Alcontrol Labs.
4) VOCs Analysed by EPA, Kilkenny
5) Solvents Analysed by EPA, Dublin
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14) Colour Analysis: Hazen units = mg/l Pt Co
15) The scope and accuracy of the analysis is shown on the reverse side of each report sheet
16) (**) Indicates parameters / results produced from non-accredited analytical methods

			Laboratory Ref:	2800698	2800699	
			Type of sample:	Surface Water	Surface Water	
			Sampling point:	S5-1	S5-2	
			Sampled by:	Wayne Egan	Wayne Egan	
			Time Sampled:	11.05	11.35	
			Start/End - Dates of Analysis:	21-02-08/25-02-08	21-02-08/25-02-08	
			Status of results:	Final	Final	
Parameter	Units	Limits				
F.. Temperature	°C			8.4	7.7	
B4 pH @20°C	pH Units			7.3	4.5	
B5 Conductivity @25°C	µS/cm			140	190	
B1 Chemical Oxygen Demand	mg/l O2			30	36	
B7 Suspended Solids	mg/l			<8	<8	
C1 Ammonia	mg/l N			<0.03	0.11	

Signed: Ray Smith Date: 05/03/08
Ray Smith
Regional Chemist, EPA Castlebar

Annette Jordan
Office of Environmental Enforcement
Environmental Protection Agency
Regional Inspectorate
John Moore Rd.
Castlebar
Co Mayo

20th December 2007

Ref: W199-1/Srah059

Re. Comments on EPA sampling analysis at Srahmore

Dear Ms Jordan,

With regard to W0199-01/(07)GEN04AJ.doc and results of analysis carried out on samples taken from the Location 7 at the Srahmore site by the EPA on the 19/11/2007, condition 4.1.1 requires eight out of ten consecutive results, calculated as daily mean concentration or mass emission values on the basis of flow proportional composite sampling, not to exceed the emission limit value. No individual result similarly calculated shall exceed 1.2 times the emission limit value. The result of 41mg/l for Location 7, is therefore is not a non-compliance as it is less than 1.2 times 35mg/l. All other parameters are in line with BNM's own sampling.

The results from S5-1 and S5-2 are also below the ELV of 35mg/l at <8 and 10 mg/l.

Yours sincerely

Enda McDonagh
Bord na Mona Energy Ltd.
Tel 057 93 45911
Mob 086 2370816

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

28th November 2008

Ref: W199-1/Srah066

Re. Notification of Non-compliance

Dear Mr. O'Suilleabhain

In relation to the notification of non-compliance received on the 26th November, the corrective actions are as follows:

1. Non-compliances:

Since the site visit, the groundwater sampling took place on Monday the 24th November. Once these results are returned and OK, they will be included on a file of all monitoring, kept up to date, and stored at the site office in Srahmore.

2. Observations:

Operation of composite sampler.

We are currently seeking information on a more suitable bottle arrangement to allow for this. This will facilitate adequate volumes for our own sampling requirements and allow for the provision of an adequate sample volume for EPA sampling requirements. This will be in-place for in the next 2/3 weeks.

Access to Monitoring Points.

The access bridge has since been fitted with timber laths and a handrail on both sides will be provided. This will be in-place for the next EPA sampling event.

Weighbridge & wheelwash.

Subject to permission from the agency and a waste licence review to facilitate extra volumes of peat, these facilities will be installed prior to the commencement of peat deliveries.

If you have any further queries on these, please let me know.

Yours sincerely

Enda McDonagh
Bord na Mona Energy Ltd.
Tel 057 93 45911
Mob 086 2370816

cc. Richard Cosgrove.