

*Bord na Móna
Energy Ltd.*

Integrated Pollution Control
Licence Application

ATTACHMENT No. 15

*ENVIRONMENTAL
CONSIDERATIONS*

A proposed environmental improvements programme to reduce/remove potential impacts of on-site activities within the Derrygreenagh Group and associated emissions on the receiving environment are currently under review. This programme takes the form of recommendations for the implementation of day to day management practices/operational procedures in order to reduce and/or appropriately treat various emissions to surface water, emissions to ground, fugitive dust emissions, noise emissions and solid waste generation (refer to attached 'Codes of Practice').

Bord na Móna recognises the importance of peatlands as sites of scientific and archaeological study. Bord na Móna is aware that significant sites have been previously discovered in the peatlands e.g. Lough Boora Mesolithic site, the Corlea road and Clonfinlough Bronze Age Settlement. Given that other important archaeological features may survive beneath unharvested peatlands, Bord na Móna will continue to co-operate with the relevant archaeological authorities. In 1998 an agreement was concluded between Bord na Móna and the Department of Arts, Heritage, Gaeltacht and the Islands regarding the protection of archaeological heritage (see attached). A code of practice has since been drawn up. In addition a code of practice has been drawn up with general recommendations on how to handle archaeological finds (see attached).

ENVIRONMENTAL CODE OF PRACTICE FOR BORD NA MÓNA WORKS

PRODUCTION

Silt Control

- 1. Ensure that properly designed silt control ponds are on all outfalls.**
- 2. Keep silt ponds properly maintained.**
- 3. Keep records of silt control and maintenance.**
- 4. Deal with all complaints promptly.**
- 5. Install weirs on all silt ponds.**
- 6. Raise weirs during heavy rain if stock is not affected.**
- 7. Protect manholes and keep free of peat.**
- 8. Ensure that harrows, millers, ridgers do not drag loose peat into manholes.**
- 9. Have outer harrow spoons directed away from drain.**
- 10. Take precautions to prevent silt run off while piping outfalls.**
- 11. Clean outfalls starting upstream.**
- 12. While cleaning outfalls install barrier (e.g. poles) downstream.**
- 13. Ditch drains in suitable weather.**
- 14. Block outlets from field drains during stockpile loading.**
- 15. Ditch dry peat from drain before unblocking.**

ENVIRONMENTAL CODE OF PRACTICE FOR BORD NA MÓNA WORKS

PRODUCTION

Dust Control

- 1. Identify and record sensitive areas.**
- 2. Plant shelter belts in sensitive areas.**
- 3. Avoid harvesting in sensitive areas during windy weather.**
- 4. Use grassed passways for machinery.**
- 5. Keep headlands clean - remove loose peat.**
- 6. Slow down when travelling along dusty headlands.**
- 7. When harvesting keep jib low on stockpile.**
- 8. Roll final harvest on uncovered stockpiles.**
- 9. Plant shelter belts around outloading facilities.**
- 10. Clean road crossings after use.**

ENVIRONMENTAL CODE OF PRACTICE FOR BORD NA MÓNA WORKS

TRANSPORT

1. Ensure all road transport is clean and well maintained.
2. Keep entrance/exit to outloading areas clean.
3. Ensure that no loose peat remains on top of lorries.
4. Ensure all lorries are properly covered.

TEMPORARY TRACK

1. Ensure all materials are collected following lifting of temporary track.

ENVIRONMENTAL CODE OF PRACTICE FOR BORD NA MÓNA WORKS

WORKSHOPS

- 1. Ensure oil storage tanks are adequately banded.**
- 2. Have in place emergency procedures for oil spillage.**
- 3. Recycle waste oil.**
- 4. Keep yards clean - free of oil, dust and debris.**
- 5. Have a designated area for scrap.**
- 6. Use bins for garbage and dispose of in County Council landfill.**
- 7. Keep buildings clean and painted.**
- 8. Insulate where possible and keep doors maintained to conserve energy.**
- 9. Landscape all open areas.**
- 10. Ensure septic tanks and treatment works are properly maintained.**

ENVIRONMENTAL CODE OF PRACTICE FOR BORD NA MÓNA WORKS

TEA CENTRES

- 1. Keep the buildings clean and painted.**
- 2. Arrange for collection of garbage, scrap, waste oil and filters.**
- 3. Ensure public road access is free of hazards.**
- 4. Bund oil tanks.**
- 5. Ensure septic tank is properly maintained.**

ENVIRONMENTAL CODE OF PRACTICE FOR BORD NA MÓNA WORKS

Polythene

- 1. Remove any damaged or torn polythene immediately.**
- 2. Take all used polythene to designated area for collection and recycling.**

Principles agreed between the Department of Arts, Heritage, Gaeltacht and the Islands,
Bord na Móna and the Department of Public Enterprise

1. The Minister for Arts, Heritage, Gaeltacht and the Islands has a responsibility to protect the archaeological heritage and to exercise powers under the National Monuments Acts 1930 - 1994 in that regard, including the placing of Preservation Orders, where necessary.
2. Bord na Móna is a commercial State body with a statutory mandate to develop the national peat resource and has entered into commercial contracts for the supply of peat products.
3. Peatlands are of major archaeological interest and potential, and the large scale peat extraction undertaken by Bord na Móna has considerable archaeological implications which must be addressed.
4. Bord na Móna has a responsibility to ensure that its activities are conducted so as to afford appropriate protection to the archaeological heritage.
5. Bord na Móna will establish a network of regional liaison officers in order to facilitate effective communications between Bord na Móna and the Department of Arts, Heritage, Gaeltacht and the Islands (Dúchas, The Heritage Service and The National Museum of Ireland).
6. The Department of Arts, Heritage, Gaeltacht and the Islands will provide workshops to assist Bord na Móna operational staff in the identification and treatment of archaeological finds.
7. A Code of Practice will be drawn up by the Department of Arts, Heritage, Gaeltacht and the Islands in agreement with Bord na Móna to complement the training of Bord na Móna operational staff.

8. The archaeological responses necessitated by Bord na Móna's operations include
 - i an appropriate level of archaeological assessment, survey and monitoring of production bogs, on the advice of Dúchas, the Heritage Service of the Department of Arts, Heritage, Gaeltacht and the Islands.
 - ii an appropriate level of archaeological excavation of archaeological sites and objects identified as a result of surveying or in the course of peat extraction, on the advice of the Department of Arts, Heritage, Gaeltacht and the Islands (Dúchas/NMI as appropriate).
 - iii preservation *in-situ* of archaeological sites in those particular circumstances where required by Dúchas, the Heritage Service.
9. "Developer funding" is now an accepted principle established by custom and practice and this applies to archaeological responses necessitated by Bord na Móna's operations.
10. In the context of paragraphs 8 and 9 above, problems which arise resulting from potential conflicts of interest between peat production and conservation of the archaeological heritage will be addressed in partnership between the Minister for Arts, Heritage, Gaeltacht and the Islands and Bord na Móna. This requires a properly structured joint approach to dealing with the archaeological implications of Bord na Móna's operations and to the resolution of problems. To this end a formal bi-lateral committee will be established between the Department of Arts, Heritage, Gaeltacht and the Islands, (including The National Museum of Ireland) and Bord na Móna.

Archaeology and Bogland – Code of Practice

WHAT TO EXPECT

Thousands of archaeological sites and objects survive within and under our bogs. The most common type of site which will be encountered is the trackway, or togher, which can be made of planks, roundwoods, brushwood, gravel or flagstones. Brushwood platforms, rows of wooden posts and traces of timber huts may also be discovered. Ancient cooking places (*fulachta fiadha*) are often found close to bog margins, and can be recognised by the presence of large quantities of burnt stone.

Sites are also found on the mineral soil underneath the peat, particularly under the blanket peats in western regions. These include stone banks, mounds, megalithic tombs, standing stones, and stone circles and rows.

Many objects have either been lost or deposited in our bogs over the centuries. These include tools, implements and weapons made from wood, stone or metal; ornaments made from bronze or even gold; wooden vessels, which sometimes contain bog butter; wooden deer traps and wheels and items of clothing made from leather or textile. Occasionally human bodies, or parts of bodies, as well as animal remains are found preserved in the peat.

All objects, sites or monuments, no matter how fragmentary,
are important elements of our heritage.

WHAT TO DO

- Check whether there are any known archaeological sites in your area.
- Be vigilant at all times – objects or traces of structures can be found on the field surfaces, in the drain faces and on the bog margins.
- If an object is found, leave it in place if it is safe to do so, note its position and immediately contact your Archaeological Liaison Officer who will assess the situation and contact the authorities.
- If the object is already dislodged or is in imminent danger, remove it carefully, mark its find spot and report it immediately to your Archaeological Liaison Officer.
- Objects made of wood, leather or textile which are removed from peat should be kept in conditions similar to those in which they are found. This can be done by packing them in peat or, if waterlogged, placing them in a basin of water. Resist the temptation to clean the object.
- If timbers or other materials, such as gravel or stones, which could be part of a man-made structure are noted on the bog, mark the location and report it immediately to your Archaeological Liaison Officer. If you suspect the find is of archaeological importance, resist the temptation to expose it any further as this could result in damage to the structure.
- Report anything that looks unnatural in the bog – your Archaeological Liaison Officer will decide whether it should be referred to the appropriate authorities.

REMEMBER

Our archaeological heritage is a finite, non-renewable resource. Once a site is destroyed, its information is lost forever and we have lost the chance to understand a little more about our past, where we have come from and perhaps the opportunity to learn for the future.

Your Archaeological Liaison Officer is: