

Appendix 7.5 – Example of an EPA IPC Licence Condition for the Peat Supply Bogs (related to emissions to water and protection of water)

## Condition 6 Emissions to Water

- 6.1 No specified emission to water shall exceed the emission limit values set out in *Schedule 1(i) Emissions to Water* subject to Condition 3 of this licence. There shall be no other emissions to water of environmental significance.
- 6.2 The licensee shall within three months of date of grant submit to the Agency for approval, a proposal for a surface water discharge monitoring location programme. This programme shall, *inter alia*, have regard to the current status of each bogland (virgin, under development, operational or worked out), sensitivity of the receiving water, status of silt pond upgrade programme. This programme shall be reviewed and revised as necessary each year as part of the AER.
- 6.3 The licensee shall, within six months of date of grant of licence, present a proposal for the installation (on a long term basis) of a flow proportionate composite sampler to one representative process effluent surface water discharge point within the licensed area. The proposal shall set out the rationale for selection of the nominated discharge point as well as the intended sampling programme. The results of this monitoring are to be reported each year as part of the AER. Any proposal to relocate the composite sampler is to be dealt with under Condition 6.2.
- 6.4 Monitoring and analyses of each agreed emission monitoring location shall be carried out as specified in *Schedule 1(ii) Monitoring of Emissions to Water* of this licence. A report on the results of this monitoring shall be submitted to the Agency quarterly.
- 6.5 A summary report of emissions to water shall be submitted to the Agency as part of the AER. The information contained in this report shall be prepared in accordance with any relevant guidelines issued by the Agency.
- 6.6 The licensee shall, within six months of the date of grant of licence, develop and implement a programme to ensure that all drainage water from all boglands in the licensed area is discharged via an appropriately designed silt pond treatment arrangement. The programme, to be implemented within a period to be agreed with the Agency, shall ensure that all discharges associated with operational boglands should be prioritised within this programme.
- 6.7 Within three months of the date of grant of licence, the licensee shall prepare an operational procedure for de-silting of the silt ponds. The procedure shall as a minimum provide for visual inspection of all ponds on a fortnightly basis. The de-silting roster shall be based on recommendations of such visual inspection. A log of visual inspection and de-silting shall be maintained and a summary report on the de-silting programme shall be included in the AER. The licensee shall, within twelve months of the date of grant of the licence, demonstrate to the satisfaction of the Agency that the programme of inspection is adequate.
- 6.8 Silt ponds serving operational bogs shall be cleaned as a minimum twice a year, once before ditching and once before harvesting, and more frequently as inspections may dictate (refer Condition 6.7).
- 6.9 Within six months of the date of grant of licence, the licensee shall prepare a programme, for agreement with the Agency, to upgrade all the sedimentation pond treatment system. The programme shall, *inter alia*, address provision of additional ponds, weir or pipe installation (inlet and outlet), pond configuration, use of baffles, performance efficiency and frequency of de-silting. The upgrade shall have regard to the minimum silt pond specifications detailed in Condition 6.10.

- 6.10 Within three years of date of grant of this licence all existing silt ponds serving operational bogs shall achieve the following minimum performance criteria (flood periods excepted):
- Maximum flow velocity < 10 cms<sup>-1</sup>
  - Silt design capacity of lagoons, minimum 50m<sup>3</sup> per nett ha of bog serviced
- All new ponds installed shall be designed to achieve these stated minimum design criteria.
- 6.11 All silt ponds prone to flooding shall be de-silted by 1<sup>st</sup> November of each year. Excavated sludge shall be removed for disposal to a location outside the flood plain.
- 6.12 In respect of silt control the licensee shall, within nine months of date of grant of this licence, prepare and implement procedures to ensure that:
- (i) drainage manholes are protected and maintained free of excessive peat,
  - (ii) headlands are kept clean and free of excessive loose peat,
  - (iii) all new manholes and outfalls are set well back from turning grounds, drivers of bog plant do not turn short (over drains) at headlands,
  - (iv) harrows, millers, ridgers do not drag loose peat onto manholes or into drains, outside harrow spoons are directed away from drains,
  - (v) silt run-off, while piping or ditching, is minimised,
  - (vi) outfalls are controlled to minimise silt discharge during cleaning operations,
  - (vii) drains are ditched in dry weather,
  - (viii) while ditching, outfalls are blocked and ditch towards outfall,
  - (ix) outlets from stockpile field drains are blocked during stockpile loading,
  - (x) field drains adjacent to stockpiles are cleaned as soon as practicable after stockpile loading,
  - (xi) adequate room is allowed for rail bed beside Peco stockpiles,
  - (xii) all fields that have been milled are ridged at the end of the production season,
  - (xiii) all fields liable to winter flooding have been cleared of milled peat or re-compacted at the end of the production season.

## **Added under technical amendment 2013**

### **New and Amended Conditions**

***Amend condition 6.2 of the licence to read as follows.***

6.2 The licensee shall, by the 1<sup>st</sup> February 2013, submit for agreement by the Agency a revised proposal for a surface water discharge monitoring programme. This programme shall have regard to the following:

- (i) The current status of each bogland (virgin, under development, operational or worked out);
- (ii) The sensitivity of the receiving water;
- (iii) The relevant River Basin Management Plan;
- (iv) The nature, magnitude and variability of the discharges;
- (v) The reliability of the silt ponds control measures; and,
- (vi) The status of the silt pond upgrade programme.

The revised surface water discharge monitoring location programme shall ensure that a representative selection of all surface water emission points from boglands within the licensed area is monitored annually and that all emission points are monitored at least once every five years. Surface water emission points shall be monitored as set out in Schedule 1(ii) *Monitoring of Emissions to Water* of this licence.

***Add condition 6.13 to include the following after condition 6.12.***

6.13 The licensee shall trend the monitoring results for total ammonia and determine any statistically significant relationship that exists between the results and the current status of each bogland (virgin, under development, operational or worked out), rainfall, silt pond control measures or other factors. The licensee shall report annually as part of the AER on the trends and on any statistically significant relationship identified.

***Add condition 6.14 to include the following after condition 6.13.***

6.14 The licensee shall, by 1<sup>st</sup> February 2013, establish a suitable trigger level for total ammonia in surface water discharges. The licensee shall have in place a response programme to address the attainment or exceedence of the trigger level value. This response programme shall include the necessary actions to ensure there will be no emissions to surface water of environmental significance.

## Condition 9 Water Protection

- 9.1 Surface & Groundwater Protection - Workshop areas and Depots
- 9.1.1 No potentially polluting substance or matter shall be permitted to discharge to off-site surface waters, off site storm drains or groundwaters.
- 9.1.2 Monitoring and analyses of surface water discharges shall be carried out as specified in *Schedule 3 Monitoring of Workshop/Depot Surface Water Run-off* of this licence. A report on the results of this monitoring shall be submitted to the Agency quarterly
- 9.1.3 In the event that any analyses or observations made on the quality or appearance of surface water runoff should indicate that contamination has taken place, the licensee shall
- (i) carry out an immediate investigation to identify and isolate the source of the contamination,
  - (ii) put in place measures to prevent further contamination and to minimise the effects of any contamination on the environment,
  - (iii) and notify the Agency as soon as is practicable.
- 9.1.4 Within twelve months of the date of grant of licence, all tank and drum storage areas shall be rendered impervious to the materials stored therein. In addition, tank and drum storage areas shall, as a minimum be bunded, either locally or remotely, to a volume not less than the greater of the following;
- (i) 110% of the capacity of the largest tank or drum within the bunded area
  - (ii) 25% of the total volume of substance which could be stored within the bunded area.
- 9.1.5 Drainage from bunded areas shall be diverted for collection and safe disposal.
- 9.1.6 The integrity and water tightness of all the bunding structures and their resistance to penetration by water or other materials stored therein shall be tested and demonstrated by the licensee to the satisfaction of the Agency and shall be reported to the Agency within eighteen months from the date of grant of this licence and every two years thereafter. A report on such tests shall be included in the AER.
- 9.1.7 Within twelve months of the date of grant of licence, the loading and unloading of fuel oils shall be carried out in designated areas protected against spillage and leachate run-off. While awaiting disposal, all materials shall be collected and stored in designated areas protected against spillage and leachate run-off.
- 9.1.8 With the exception of roof water, all surface water discharges from workshop areas shall, within twenty-four months of date of grant of this licence, be fitted with oil interceptors.
- 9.1.9 An maintenance/cleaning log for all oil interceptors and septic tanks shall be maintained. This log shall also record the observations made during weekly inspections of all oil interceptors and bi-annual inspections of septic tanks.
- 9.1.10 An inspection for leaks on all flanges and valves on over-ground pipes used to transport materials other than water shall be carried out weekly.
- 9.1.11 The provision of a catchment system to collect any leaks from flanges and valves of all over ground pipes used to transport material other than water shall be examined.
- 9.1.12 The licensee shall have in storage an adequate supply of containment booms and/or suitable absorbent material to contain and absorb any spillage.
- 9.1.13 The licensee shall maintain a log of bi-annual inspections of all rail and tractor transported fuelling units. These inspections as a minimum should record any damage or leaks or flaws in rolling stock that could result in accidental spillage.