



## **APPENDIX 4-5**

### ***DECOMMISSIONING PLAN***

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1.

# INTRODUCTION

This Decommissioning Plan has been prepared by MKO on behalf of Bord na Móna Powergen Ltd. for the decommissioning of the proposed Ballivor Wind Farm development and relevant infrastructure which is hereafter referred to as the Proposed Development. This document is being prepared, alongside an Environmental Impact Assessment Report (EIAR), as part of an application for planning permission for the Proposed Development to An Bord Pleanála. Decommissioning of the Proposed Development will be scheduled to take place after the proposed 30-year lifespan of the project.

This report provides the environmental management framework to be adhered to during the decommissioning phase of the Proposed Development and it incorporates the mitigating principles to ensure that the work is carried out in a way that minimises the potential for environmental impact.

As noted in the Scottish Natural Heritage report (SNH) Research and Guidance on Restoration and Decommissioning of Onshore Wind Farms (SNH, 2013) reinstatement proposals for a wind farm are made approximately 30 years in advance, so within the lifespan of the wind farm, technological advances and preferred approaches to reinstatement are likely to change. According to the SNH guidance, it is therefore:

*“best practice not to limit options too far in advance of actual decommissioning but to maintain informed flexibility until close to the end-of-life of the wind farm”.*

In this regard, this Decommissioning Plan will be reviewed and updated prior to commencement of a decommissioning works to take account of the relevant conditions of the planning permission and current health and safety standards.

1.1

## Scope of the Decommissioning Plan

This report is presented as a plan for the decommissioning of the Proposed Development including its connection to the national grid. Where the term ‘site’ is used in the Decommissioning Plan it refers to the site of the Proposed Development and all works associated with the Proposed Development including enabling works. The Decommissioning Plan clearly outlines the mitigation measures and monitoring proposals that are required to be adhered to in order to complete the works in an appropriate manner.

The report is divided into eight sections, as outlined below:

- › **Section 1** provides a brief introduction as to the scope of the report.
- › **Section 2** gives the Site and Project details, detailing the targets and objectives of this plan along with providing an overview of works methodologies that will be adopted throughout decommissioning.
- › **Section 3** sets out details of the environmental controls to be implemented on site including the mechanisms for implementation. A waste management plan is also included in this section.
- › **Section 4** details the Emergency Response Procedure to be adopted in the event of an emergency in terms of site health and safety and environmental protection.
- › **Section 5** sets out a programme for the timing of the works.
- › **Section 6** consists of a summary table of all mitigation measures to be adhered to during the decommissioning-phase.
- › **Section 7** details the proposals for reviewing compliance with the provisions of this report.

## 2. SITE AND PROJECT DETAILS

### 2.1 Site Location and Description

The Proposed Ballivor Wind Farm is located on four bogs within the Ballivor Bog Group at the Meath-Westmeath border, namely Ballivor, Carranstown, Bracklin and Lisclogher, Bogs. The site is located 2.5 km south-southeast of Delvin, 3.7km east of Raharney and 2.2km west of Ballivor Village.

The Proposed Development site area measures approximately 1,170 hectares. The site topography ranges between 86 metres above ordnance datum (mAOD) at its highest point to approximately 69 mAOD at its lowest point. The site measures approximately 9 kilometres in length from north to south, and approximately 6.0 kilometres from east to west, at its widest point. The Grid Reference co-ordinates for the approximate centre of the site are E263560, N257213.

The Ballivor Bog Group is accessed via the R156 Regional Road, which bisects the site, and is within close proximity of the broader public road network including the N52, N51, N4, R161 and several local roads such as L4101, the L4106.

The proposed grid connection forms part of the planning application. It is proposed to construct a 110kV substation within the site at Carranstown Bog in the townland of Grange More and to connect from here via a 110 kV loop-in connection to the existing Mullingar to Corduff 110 kV overhead line which traverses the site. The electrical substation will have 2 No. control buildings, associated switchgear room, electrical plant and equipment, and wastewater holding tank.

To connect turbines in Ballivor and Lisclogher Bogs with the remaining infrastructure short sections of internal collector network cables will be constructed in underground ducts that will be laid in trenches (11m) across the R156 and across a local road between Lisclogher and Bracklin Bogs will be required. Both road crossings fall within the Applicants landholding.

### 2.2 Description of the Development

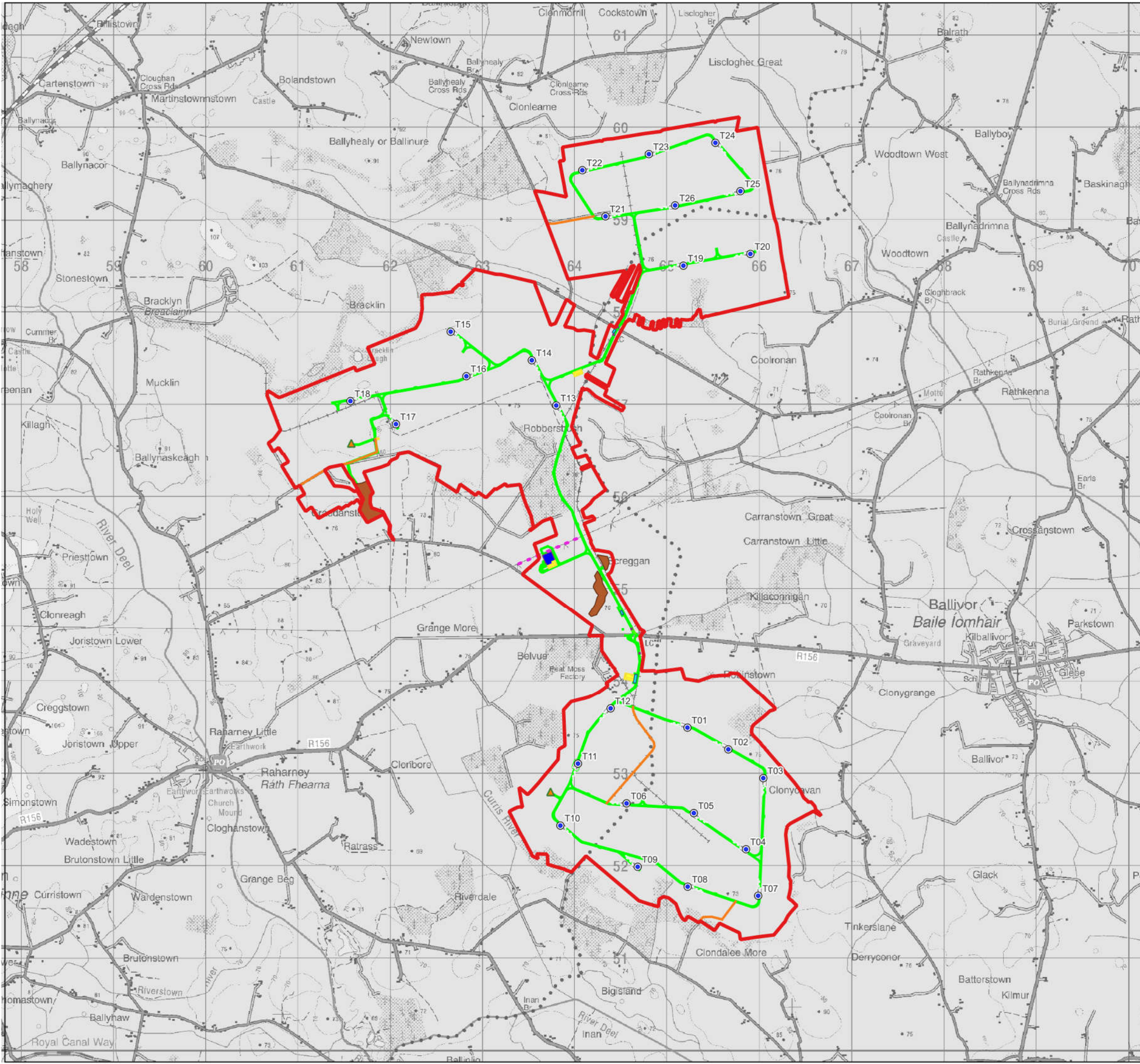
The Proposed Development will comprise the construction of 26 No. wind turbines and all associated works. The proposed turbines will have a blade tip height of 200 metres. The site layout showing individual elements of the Proposed Development is shown in **Figure 2-1**. The full description of the proposed development is as follows:

- i. 26 No. wind turbines with a blade tip height of 200m and all associated hard-standing areas.*
- ii. 2 No. permanent Meteorological Anemometry Masts with a height of 115 metres and removal of existing meteorological mast.*
- iii. 4 No. temporary construction compounds, in the townlands of Bracklin and Grange More.*
- iv. 5 No. temporary security cabins at the main construction site entrances as well as at a number of access points around the site, in the townland of Killagh, Grange More and Coolronan.*
- v. 2 No. borrow pits located in Carranstown Bog, and in third party land in the townland of Craddanstown; All works associated with the opening, gravel and spoil extraction, and decommissioning of the borrow pits.*
- vi. 1 No. 110 kV electrical substation, which will be constructed in the townland of Grange More. The electrical substation will have 2 No. control buildings, a 36 metre high telecom tower, associated electrical plant and equipment, a groundwater well and a wastewater holding tank. All associated underground electrical and communications cabling connecting the turbines and masts to the proposed electrical substation, including road*

- crossings at R156 and local road between Lislogher and Bracklin Bogs, and all works associated with the connection of the proposed wind farm to the national electricity grid, which will be to the existing Mullingar – Corduff 110 kV overhead line via overhead line.*
- vii. Provision of new internal site access roads with passing bays measuring a total length of 28km and provision/upgrade of existing/new pathways for amenity uses measuring a total length of approximately 3.3km and associated drainage.*
  - viii. Temporary accommodating works to existing public road infrastructure to facilitate delivery of abnormal loads at locations on the R156 and R161 in the townlands of Doolystown and Moyfeagher;*
  - ix. Accommodating works to widen existing site entrances off the R156 into Ballivor and Carranstown Bogs and reopen entrances at Lislogher and Bracklin Bogs for use as construction site entrances and to facilitate delivery and movement of turbine components and construction materials; Entrances will be used for maintenance and amenity access during the operational period;*
  - x. Permanent vertical realignment of the R156 in the vicinity of the site entrance to achieve required sight lines.*
  - xi. Construction of permanent site entrances off a local road into Lislogher and Bracklin Bogs to facilitate a crossing point for turbine components and construction materials and operation/amenity access;*
  - xii. Provision of amenity access using existing entrances off the R156 and local roads in the townlands of Bracklin, Coolronan, Clondalee More and Craddanstown;*
  - xiii. 3 No. permanent amenity carparks in Ballivor Bog (50 car parking spaces), Carranstown (15 car parking spaces) and Bracklin Bog (15 car parking spaces) and the provision of bicycle rack facilities at each location.*
  - xiv. All associated site works and ancillary development including access roads, amenity pathways, and signage.*
  - xv. A 10-year planning permission and 30-year operational life from the date of commissioning of the entire wind farm.*







### Map Legend

- ▭ Wind Farm Site Boundary
- Proposed Turbine Locations
- Proposed Internal Roads
- ▭ Proposed Security Cabins
- ▭ Proposed Borrow Pits
- ▭ Proposed Substation Location
- ▭ Proposed Compounds
- ▲ Proposed Met Mast Location
- - - Proposed Grid Connection
- ▭ Proposed Amenity Carparks
- Proposed Amenity Paths



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Drawing Title	
<b>Proposed Site Layout</b>	
Project Title	
<b>Proposed Ballivor Wind Farm</b>	
Drawn By	Checked By
<b>DOS</b>	<b>KM</b>
Project No.	Drawing No.
<b>191137</b>	<b>Figure 2-1</b>
Scale	Date
<b>1:40,000</b>	<b>2023-03-01</b>



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As construction is completed, elements of the project that have been developed as a temporary facilitator works will either be removed, reinstated with vegetative cover, restored to its original condition or will naturally revegetate. These include temporary construction compounds, borrow pits and peat and spoil repository areas.

All access roads and hardstanding areas forming part of a site roadway network which will be required by wind farm operation and maintenance staff will be left in situ for future use. It is intended that all above ground components and underground cabling (ducting left in-situ) will be removed from the site as part of the decommissioning of the Proposed Development. The following elements are included in the decommissioning phase:

- › Wind turbine and meteorological mast dismantling and removal off site;
- › Underground cabling removal (ducting left in-situ);
- › Turbine foundation backfilling following dismantling and removal of wind turbines (any excavated material will be re-instated / foundations that protrude above ground level will be backfilled with soil - underground reinforced concrete remaining in-situ)
- › Transport Route Accommodation Works.

## 2.3 Targets and Objectives

The decommissioning phase works will be completed to approved standards, which include specified materials, standards, specifications and codes of practice.

The key site targets are as follows:

- › Ensure decommissioning works and activities are completed in accordance with mitigation and best practice approach presented in the accompanying Environmental Impact Assessment Report (EIAR) and associated planning documentation.
- › Ensure decommissioning works and activities have an imperceptible impact/disturbance to local landowners and the local community.
- › Ensure decommissioning works and activities have an imperceptible impact on the natural environment.
- › Ensure decommissioning works and activities will not impact on rehabilitated peatlands (under IPC and PCAS schemes) that are insitu within and adjacent to the Wind Farm Site Boundary.
- › Adopt a sustainable approach to decommissioning; and,
- › Provide adequate environmental training and awareness (to the approved standards at the time of decommissioning) for all project personnel.

The key site objectives are as follows:

- › Using recycled materials, if possible, e.g., soil and overburden material for backfilling and reinstatement.
- › Ensure sustainable sources for materials supply where possible.
- › Avoidance of any pollution incident as a result of working around or close to existing watercourses and have emergency measures in place.
- › Avoidance of vandalism.
- › Keeping all watercourses free from obstruction and debris.
- › Correct implementation of the sustainable drainage system (SuDS) drainage design principles.
- › Keep impact of decommissioning works to a minimum on the local environment, watercourses, and wildlife.
- › Correct fuel storage and refuelling procedures to be followed.
- › Good waste management to be implemented.



- > Air and noise pollution prevention to be implemented.
- > Monitoring of the works and any adverse effects that it may have on the environment.

## 2.4 Decommissioning Methodologies Overview

### 2.4.1 Introduction

An experienced main contractor will be appointed to undertake the decommissioning of the Proposed Development. The main contractors will comply with the DP prepared for the decommissioning phase. An overview of the decommissioning methodologies is provided below.

### 2.4.2 Decommissioning Methodology

The proposed decommissioning methodology is summarised under the following main headings:

- > Wind turbines.
- > Meteorological masts.
- > Turbine and mast Foundations.
- > Underground Cabling.
- > Transport Route Accommodation Works.

#### 2.4.2.1 Wind Turbines

Prior to any decommissioning works being undertaken on wind turbines and meteorological masts, they will be disconnected from the internal wind farm power supply by the site operator in conjunction with ESB Networks and Eirgrid as required. The dismantling and removal of wind turbines of this scale is a specialist operation which will be undertaken by the turbine supplier or competent subcontractor. Turbine dismantling will be undertaken in reverse order to methodology employed during their construction. Cranes will be brought back to site utilising the hard stand areas that will be present after the construction phase. The dismantling of turbines and masts will be bound by the same safety considerations as will be the case during construction in terms of weather conditions where works will not be undertaken during adverse weather conditions and in particular not during high winds.

The turbines will be disassembled and removed from site. This process will be undertaken in accordance with a Transport Management Plan which will be issued to and agreed with the competent authority at that time as part of a permit application for the delivery of abnormal loads using the local roads under the Road Traffic (Special Permits for Particular Vehicles) Regulations 2007. The Transport Management Plan will provide for all necessary safety measures, including a convoy and Garda escort as required, off-peak turning/reversing movements and any necessary safety controls.

#### 2.4.2.2 Turbine Foundations

On the dismantling of turbines, it is not intended to remove the concrete foundation from the ground. It is considered that its removal will be the least preferred options in terms of potential effects on the environment. Therefore, the 26 no. turbine foundations will be backfilled and covered with peat, following the dismantling and removal of the wind turbines where the concrete foundation is protruding above ground level. If there is usable peat or overburden material on the site after construction, this material will be used.

#### 2.4.2.3 Underground Cabling

The cabling will be pulled from the cable duct using a mechanical winch which will extract the cable and re-roll it on to a cable drum. This will be undertaken at each of the joint bays/pull pits along the cable.

The ground above original pulling pits/joint bays will be excavated using a mechanical excavator and will be fully re-instated once the cables are removed. The cable ducting will be left in-situ as it is considered the most environmentally prudent option, avoiding unnecessary excavation and soil disturbance for an underground element that is not visible with no environmental impact associated with leaving the ducting in-situ. The onsite substation will remain in place as it will be under the ownership of the ESB and will form a permanent part of the national electricity grid.

### 3. ENVIRONMENTAL MANAGEMENT

The following sections give an overview of the drainage, dust and noise control measures during decommissioning, a waste management plan for the site and the implementation of the environmental management procedures. All decommissioning measures will take cognisance of the extant rehabilitated peatlands, if and where present, in and around the wind farm infrastructure as implemented under IPC licence as part of the final Cutaway Bog Decommissioning and Rehabilitation Plans which will be agreed by the EPA. Similarly, the decommissioning process will consider any additional rehabilitation measures that may be implemented during the lifetime of the Ballivor Wind Farm and any rehabilitation measures implemented at the site under the ongoing Peatland Climate Action Scheme (PCAS). Please see <https://www.bnmpcas.ie/> for details.

#### 3.1 Site Drainage

The site drainage features for this site during its construction and operation are outlined in the EIAR and drainage plan which accompany this application. When the final Decommissioning Plan is prepared prior to decommissioning and presented as a standalone document, all drainage management measures, which will include maintenance of the operational drainage measures, will be included. However, it is noted that by the time decommissioning is undertaken after the planned 30-year lifespan of the Proposed Development, the areas within the site will have revegetated resulting in a more natural drainage system. It is not anticipated that the decommissioning phase will interrupt this restored drainage regime in any way with the works proposed. As a minimum measure, areas where freshly placed soil material as part of turbine foundation reinstatement work will be surrounded by silt fencing if deemed necessary until the area has naturally revegetated.

#### 3.2 Refuelling; Fuel and Hazardous Materials Storage

The plant and equipment used during decommissioning will require refuelling during the works. Appropriate management of fuels will be required to ensure that incidents relating to refuelling are avoided. The following mitigation measures, which are the same as those proposed for the construction phase, are proposed to avoid release of hydrocarbons at the site:

- › Road-going vehicles will be refuelled off site wherever possible.
- › On-site refuelling will be carried out at designated refuelling areas at various locations throughout the site. Machinery will be refuelled directly by a fuel truck that will come to site as required.
- › Only designated trained and competent operatives will be authorised to refuel plant on site. Mobile measures such as drip trays and fuel absorbent mats will be used during all refuelling operations.
- › Fuel volumes stored on site will be minimised. Any fuel storage areas will be bunded appropriately.
- › The plant used will be regularly inspected for leaks and fitness for purpose;
- › An emergency plan for the decommissioning phase to deal with accidental spillages will be developed. Spill kits will be available to deal with any accidental spillage in and outside the refuelling area.
- › A programme for the regular inspection of plant and equipment for leaks and fitness for purpose will be developed at the outset of the decommissioning phase.

### 3.3 Dust Control

Dust can be generated from on-site activities during decommissioning such as backfilling of foundations and travelling on site roads during prolonged periods of dry weather. The extent of dust generation will depend on the type of activity undertaken, the location, the nature of the dust, i.e., soil, and the weather. In addition, dust dispersion is influenced by external factors such as wind speed and direction and/or, periods of dry weather. Site traffic movements also have the potential to generate dust as they travel along the haul route.

Proposed measures, which are the same as those proposed for the construction phase, to control dust include:

- › Any site roads with the potential to give rise to dust will be regularly watered, as appropriate, during dry and/or windy conditions.
- › The designated public roads outside the site and along the main transport routes to the site will be regularly inspected by the Site Manager for cleanliness and cleaned as necessary.
- › Material handling systems and material storage areas will be designed and laid out to minimise exposure to wind.
- › Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods.
- › The transport of soils or other material, which has significant potential to generate dust, will be undertaken in tarpaulin-covered vehicles where necessary.
- › All site related traffic will have speed restrictions on un-surfaced roads to 15 kph.
- › Daily inspection of the site to examine dust measures and their effectiveness.
- › When necessary, local sections of the public roads being used will be swept using a truck mounted vacuum sweeper.

### 3.4 Noise Control

The operation of plant and machinery, including site vehicles, is a source of potential impact that will require mitigation at all locations within the site. Proposed measures, which are the same as those proposed for the construction phase, to control noise include:

- › Diesel generators will be enclosed in sound proofed containers to minimise the potential for noise impacts.
- › Plant and machinery with low inherent potential for generation of noise and/or vibration will be selected. All plant and equipment to be used on-site will be modern equipment and will comply with the S.I. No. 359/1996 - European Communities (Construction Plant and Equipment) (Permissible Noise Levels) (Amendment) Regulations.
- › Regular maintenance of plant will be carried out in order to minimise noise emissions. Particular attention will be paid to the lubrication of bearings and the integrity of silencers.
- › All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the works.
- › Compressors will be of the “sound reduced” models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers.
- › Machines, which are used intermittently, will be shut down during those periods when they are not in use.
- › Training will be provided by the Site Manager to drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation; and,



- › Local areas of the public road networking being used will be condition monitored and maintained, if necessary.

## 3.5 Invasive Species Management

Prior to decommissioning, a suitably qualified ecologist will complete an invasive species survey of the wind farm site (including along the grid connection cable route and transport route) to identify invasive species where any minor excavation will be required.

## 3.6 Traffic Management

A Traffic Management Plan will be prepared in advance of any decommissioning works. The removal of turbines from site will be undertaken by a specialist haulier. The traffic management arrangements will be agreed in advance of decommissioning with the competent authority.

### 3.6.1 Waste Management

This section of the Decommissioning Plan provides a waste management plan (WMP) which outlines the best practice procedures during the decommissioning of the Proposed Development. The WMP will outline the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of decommissioning. Disposal of waste will be a last resort.

### 3.6.2 Legislation

The Waste Management Act 1996 and its subsequent amendments provide for measures to improve performance in relation to waste management, recycling and recovery. The Act also provides a regulatory framework for meeting higher environmental standards set out by other national and EU legislation.

The Act requires that any waste related activity has to have all necessary licenses and authorisations. It will be the duty of the Waste Manager on the site of the Ballivor Wind Farm development to ensure that all contractors hired to remove waste from the site have valid Waste Collection Permits. It will then be necessary to ensure that the waste is delivered to a licensed or permitted waste facility. The hired waste contractors and subsequent receiving facilities must adhere to the conditions set out in their respective permits and authorisations. Waste removal-related traffic volumes during the decommissioning phase, will be less than those anticipated and assessed for the construction phase.

The Department of the Environment provides a document entitled, 'Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects' (2006). It is important to emphasise that no demolition will take place at this site, however, this document was referred to throughout the process of completing this WMP.

### 3.6.3 Waste Management Hierarchy

The waste management hierarchy sets out the most efficient way of managing waste in the following order:

#### Prevention and Minimisation:

The primary aim of the WMP will be to prevent and thereby reduce the amount of waste generated at each stage of the project.

### Reuse of Waste:

Reusing as much of the waste generated on site as possible will reduce the quantities of waste that will have to be transported off site to recovery facilities or landfill.

### Recycling of Waste:

There are several established markets available for the beneficial use of Construction and Demolition waste such as using waste concrete as fill for new roads.

At all times during the implementation of the WMP, disposal of waste to landfill will be considered only as a last resort.

## 3.6.4 Waste Arising from Decommissioning

The relevant components will be removed from site for re-use, recycling or waste disposal. Any structural elements that are not suitable for recycling will be disposed of in an appropriate manner. All lubrication fluids will be drained down and put aside for appropriate collection, storage, transport and disposal. Any materials which cannot be re-used or recycled will be disposed of by an appropriately licenced contractor.

The waste types arising from the decommissioning of the Proposed Development are outlined in Table 3-1 below.

Table 3-1 waste types arising during the Decommissioning Phase

Material Type	Example	EW Code
Cables	Electrical wiring	17 04 11
Metals	Copper, aluminium, lead and iron	17 04 07
Fibreglass	Turbine blade component	10 11 03
Hydrocarbons	Oils and lubricants drained from the turbines	13 01 01,13 02 04

### 3.6.4.1 Reuse

Many construction materials can be reused several times before they have to be disposed of:

- › Electrical wiring can be reused on similar wind energy projects
- › Elements of the turbine components can be reused but this will be determined by the condition that they are in.

### 3.6.4.2 Recycling

If a certain type of material cannot be reused onsite, then recycling is the most suitable option. The opportunity for recycling during decommissioning will be limited and restricted to components of the wind turbines, meteorological masts, and electrical cables.

All waste that is produced during the decommissioning phase including dry recyclables will be deposited in the on-site skip initially and sent for subsequent segregation at a remote facility. The anticipated volume of all waste material to be generated at the Ballivor Wind Farm development is low which provides the justification for adopting this method of waste management.

### 3.6.4.3 Implementation

#### 3.6.4.3.1 Roles and Responsibilities

Prior to the commencement of the decommissioning, a Decommissioning Waste Manager will be appointed by the Contractor. The Decommissioning Waste Manager will oversee the implementation of the objectives of the plan, ensuring that all hired waste contractors have the necessary authorisations and that the waste management hierarchy is adhered to. The person nominated must have sufficient authority so that they can ensure everyone working on the decommissioning adheres to the management plan.

#### 3.6.4.3.2 Training

It is important for the Decommissioning Waste Manager to communicate effectively with colleagues in relation to the aims and objectives of the waste management plan. All employees working on site during the decommissioning phase of the project will be trained in materials management and thereby, should be able to:

- › Distinguish reusable materials from those suitable for recycling.
- › Ensure maximum segregation at source.
- › Co-operate with site manager on the best locations for stockpiling reusable materials.
- › Separate materials for recovery; and
- › Identify and liaise with waste contractors and waste facility operators.

#### 3.6.4.3.3 Record Keeping

The WMP will provide systems that will enable all arisings, movements and treatments of construction waste to be recorded. This system will enable the contractor to measure and record the quantity of waste being generated. It will highlight the areas from which most waste occurs and allows the measurement of arisings against performance targets. The WMP can then be adapted with changes that are seen through record keeping.

The fully licensed waste contractor employed to remove waste from the site will be required to provide documented records for all waste dispatches leaving the site. Each record will contain the following information:

- › Consignment Reference Number
- › Material Type(s) and EWC Code(s)
- › Company Name and Address of Site of Origin
- › Trade Name and Collection Permit Reference of Waste Carrier
- › Trade Name and Licence Reference of Destination Facility
- › Date and Time of Waste Dispatch
- › Registration number of Waste Carrier vehicle
- › Weight of Material
- › Signature of Confirmation of Dispatch detail
- › Date and Time of Waste Arrival at Destination
- › Site Address of Destination Facility

#### 3.6.4.4 Waste Management Plan Conclusion

The WMP will be properly adhered to by all staff involved in the project and will be described within the induction process for all site personnel. The waste hierarchy should always be employed when designing the plan to ensure that the least possible amount of waste is produced during decommissioning. Reuse of certain types of construction wastes will cut down on the cost and requirement of raw materials therefore further minimising waste levels.

This WMP has been prepared to outline the main objectives that are to be adhered to.

## 3.7 **Environmental Management Implementation**

### 3.7.1 **Roles and Responsibilities**

A Contractor will be appointed to undertake the decommissioning activities. The Site Manager and/or Environmental Clerk of Works (ECoW) will be key members of the Contractors team and are the points of contact relating to decommissioning-related environmental issues.

In general, the ECoW will maintain responsibility for monitoring the decommissioning works and Contractors/Sub-contractors from an environmental perspective. The ECoW will act as the regulatory interface on environmental matters. The Site Manager will be responsible for reporting to and liaising with Meath and Westmeath County Councils and other statutory bodies as required.

The Site Manager in consultation with the ECoW will be responsible for employing the services of a suitably qualified ecologist and any other suitably qualified professionals as required throughout the decommissioning works.



## 4. EMERGENCY RESPONSE PLAN

An Emergency Response Plan (ERP) is presented in this section of the Decommissioning Plan. It provides details of procedures to be adopted in the event of an emergency in terms of site health and safety and environmental protection.

### 4.1 Emergency Response Procedure

The site ERP includes details the response required and the responsibilities of all personnel in the event of an emergency. The ERP will require updating and submissions from the contractor/PSCS and sub-contractors as decommissioning progresses. Where sub-contractors that are contracted on site are governed by their own emergency response procedure a bridging arrangement will be adopted to allow for inclusion of the sub-contractor’s ERP within this document.

#### 4.1.1 Roles and Responsibilities

The chain of command during an emergency response sets out who is responsible for coordinating the response. The Site Supervisor/Construction Manager will lead the emergency response which makes him responsible for activating and coordinating the emergency response procedure. The other site personnel who can be identified at this time who will be delegated responsibilities during the emergency response are presented in Figure 4-1. In a situation where the Site Supervisor/ Construction Manager is unavailable or incapable of coordinating the emergency response, the responsibility will be transferred to the next person in the chain of command outlined in Figure 4-1. This will be updated as required throughout the various stages of the project and the appointed personnel in the positions in Figure 4-1 will be identified prior to the commencement of works.

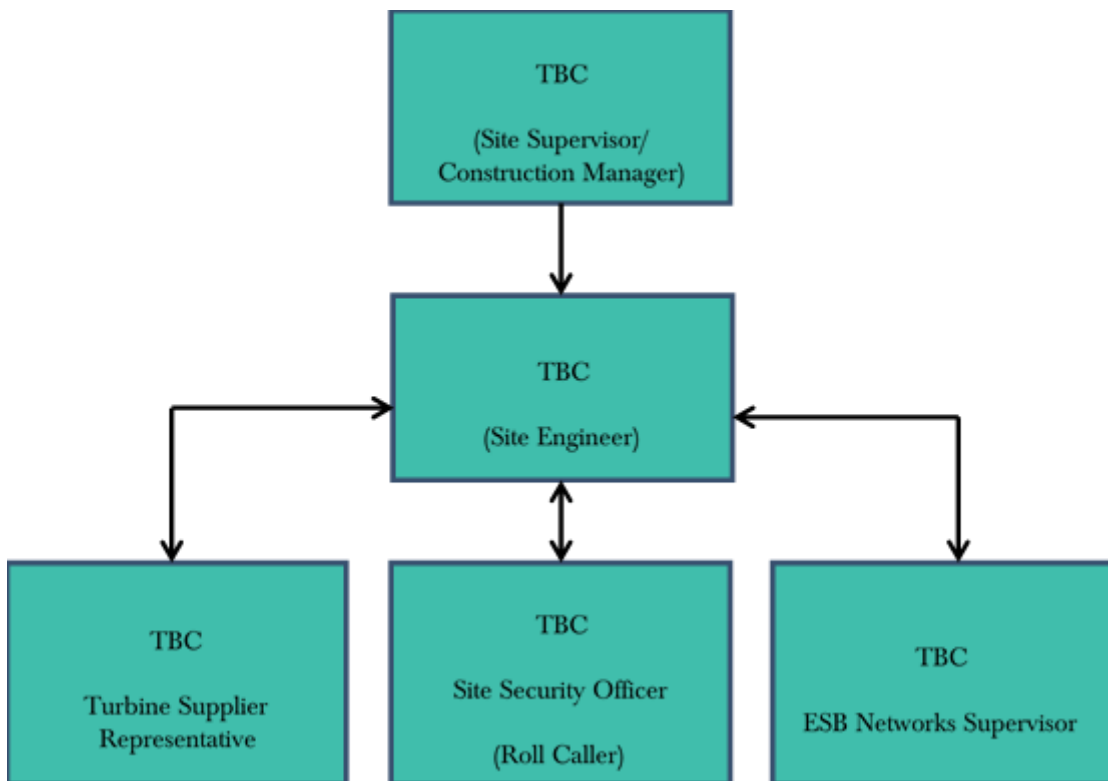


Figure 4-1 Emergency Response Procedure Chain of Command

## 4.1.2 Initial Steps

To establish the type and scale of potential emergencies that may occur, the following hazards have been identified as being potential situations that may require an emergency response.

Table 4-1 Hazards associated with potential emergency situations.

Hazard	Emergency Situation
Construction Vehicles: Dump trucks, tractors, excavators, cranes etc.	Collision or overturn which has resulted in operator, third-party injury or fuel spill.
Peat Instability	Excessive movement of peat on site; onset of peat slide.
Abrasive wheels/Portable Tools	Entanglement, amputation or electrical shock associated with portable tools
Contact with services	Electrical shock associated with an accidental breach of underground services.
Fire	Injury to operative through exposure to fire
Falls from heights including falls from scaffold towers, scissor lifts, ladders, roofs and turbines	Injury to operative after a fall from a height
Sickness	Illness unrelated to site activities of an operative e.g., heart attack, loss of consciousness, seizure
Turbine Specific Incident	This will be included the turbine manufacturers' emergency response plan.

In the event of an emergency situation associated with, but not restricted to, the hazards outlined in Table 4-2 the Site Supervisor/Construction Manager will carry out the following:

- › Establish the scale of the emergency situation and identify the number of personnel, if any, have been injured or are at risk of injury.
- › Where necessary, sound the emergency siren/foghorn that activates an emergency evacuation on the site. The Site Supervisor/Construction Manager must proceed to the assembly point if the emergency poses any significant threat to their welfare **and if there are no injured personnel at the scene that require assistance.** The Site Supervisor/Construction Manager will be required to use their own discretion at that point. In the case of fire, the emergency evacuation of the site should proceed, without exception. The site evacuation procedure is outlined in Section 4.1.3.
- › Make safe the area if possible and ensure that no identifiable risk exists with regard to dealing with the situation e.g., if a machine has turned over, ensure that it is in a safe position so as not to endanger others before assisting the injured.
- › Contact the required emergency services or delegate the task to someone. If delegating the task, ensure that the procedures for contacting the emergency services as set out in Section 4.2 is followed.
- › Take any further steps that are deemed necessary to make safe or contain the emergency incident e.g., cordon off an area where an incident associated with electrical issues has occurred.
- › Contact any regulatory body or service provider as required e.g., ESB Networks the numbers for which as provided in Section 4.3.
- › Contact the next of kin of any injured personnel where appropriate.

### 4.1.3 Site Evacuation/Fire Drill

A site evacuation/fire drill procedure will provide basis for carrying out the immediate evacuation of all site personnel in the event of an emergency. The following steps will be taken:

- › Notification of the emergency situation. Provision of a siren or foghorn to notify all personnel of an emergency situation.
- › An assembly point will be designated in the construction compound area and will be marked with a sign. All site personnel will assemble at this point.
- › A roll call will be carried out by the Site Security Officer to account for all personnel on site.
- › The Site Security Officer will inform the Site Supervisor/Construction Manager when all personnel have been accounted for. The Site Supervisor/Construction Manager will decide the next course of action, which be determined by the situation that exists at that time and will advise all personnel accordingly.

All personnel will be made aware of the evacuation procedure during site induction. The Fire Services Acts of 1981 and 2003 require the holding of fire safety evacuation drills at specified intervals and the keeping of records of such drills.

### 4.1.4 Excessive Peat Movement

In the unlikely event of excessive peat movement or continuing peat movement recorded at a monitoring location, or identified at any location within the site, but no apparent signs of distress to the peat (e.g., cracking, surface rippling) then the following shall be carried out.

1. *All decommissioning activities shall cease within the affected area.*
2. *Increased monitoring at the location shall be carried out. The area will be monitored, as appropriate, until such time as movements have ceased.*
3. *Re-commencement of limited construction activity shall only start following a cessation of movement and the completion of a geotechnical risk assessment by a geotechnical engineer.*
4. *Such detailed monitoring and awareness will further ensure that the potential for 4.1.5 below is absolutely minimised.*

### 4.1.5 Onset of Peat Slide

In the very unlikely event of an onset or actual detachment of peat (e.g., cracking, surface rippling) then the following shall be carried out.

1. *On alert of a peat slide incident, all construction activities will cease, and all available resources will be diverted to assist in the required mitigation procedures.*
2. *Where considered possible action will be taken to prevent a peat slide reaching any watercourse. This will take the form of the construction of check barrages on land. Due to the terrain, the possible short run-out length to watercourses, speed of movement and the inability to predict locations it may not be possible to implement any on-land prevention measures, in this case a watercourse check barrage will be implemented.*
3. *For localised peat slides that do not represent a risk to a watercourse and have essentially come to rest the area will be stabilised initially by rock infill, if required. The failed area and surrounding area will then be assessed by the geotechnical engineer and stabilisation procedures implemented. The area will be monitored, as appropriate, until such time as movements have ceased.*

## 4.1.6 Spill Control Measures

Every effort will be made to prevent an environmental incident during the decommissioning phase of the project. Oil/fuel spillages are one of the main environmental risks that will exist on the site which will require an emergency response procedure. The importance of a swift and effective response in the event of such an incident occurring cannot be over emphasised. The following steps provide the procedure to be followed in the event of such an incident:

- › Stop the source of the spill and raise the alarm to alert people working in the vicinity of any potential dangers.
- › If applicable, eliminate any sources of ignition in the immediate vicinity of the incident.
- › Contain the spill using the spill control materials, track mats or other material as required. Do not spread or flush away the spill.
- › If possible, cover or bund off any vulnerable areas where appropriate such as drains, watercourses or sensitive habitats.
- › If possible, clean up as much as possible using the spill control materials.
- › Contain any used spill control material and dispose of used materials appropriately using a fully licensed waste contractor with the appropriate permits so that further contamination is limited.
- › Notify the ECoW immediately giving information on the location, type and extent of the spill so that they can take appropriate action.
- › The ECoW will inspect the site and ensure the necessary measures are in place to contain and clean up the spill and prevent further spillage from occurring.
- › The ECoW will notify the appropriate regulatory body such as Meath and Westmeath County Councils, and the Environmental Protection Agency (EPA), if deemed necessary.

The importance of a swift and effective response in the event of such an incident occurring cannot be over emphasised. Environmental incidents are not limited to just fuel spillages. Therefore, any environmental incident must be investigated in accordance with the following steps.

- › The ECoW must be immediately notified.
- › If necessary, the ECoW will inform the appropriate regulatory authority. The appropriate regulatory authority will depend on the nature of the incident.
- › The details of the incident will be recorded on an Environmental Incident Form which will provide information such as the cause, extent, actions and remedial measures used following the incident. The form will also include any recommendations made to avoid reoccurrence of the incident.
- › If the incident has impacted on a sensitive receptor such as an archaeological feature the ECoW will liaise with the Project Archaeologist.
- › A record of all environmental incidents will be kept on file by the ECoW and the Main Contractor. These records will be made available to the relevant authorities such as Meath and Westmeath County Councils, EPA if required.

The ECoW will be responsible for any corrective actions required as a result of the incident e.g., an investigative report, formulation of alternative works methodologies or environmental sampling, and will advise the Main Contractor as appropriate.



## Contact the Emergency Services

In the event of requiring the assistance of the emergency services the following steps should be taken:

**Stay calm.** It is important to take a deep breath and not get excited. Any situation that requires 999/112 is, by definition, an emergency. The dispatcher or call-taker knows that and will try to move things along quickly, but under controlled conditions.

**Know the location of the emergency and the number you are calling from.** This may be asked and answered a couple of times but do not get frustrated. Even though many emergency call centres have enhanced capabilities meaning they are able to see your location on the computer screen they are still required to confirm the information. If for some reason you are disconnected, at least emergency crews will know where to go and how to call you back.

**Wait for the call-taker to ask questions, then answer clearly and calmly.** If you are in danger of assault, the dispatcher or call-taker will still need you to answer quietly, mostly "yes" and "no" questions.

**If you reach a recording, listen to what it says.** If the recording says your call cannot be completed, hang up and try again. If the recording says all call takers are busy, WAIT. When the next call-taker or dispatcher is available to take the call, it will transfer you.

**Let the call-taker guide the conversation.** He or she is typing the information into a computer and may seem to be taking forever. There is a good chance, however, that emergency services are already being sent while you are still on the line.

**Follow all directions.** In some cases, the call-taker will give you directions. Listen carefully, follow each step exactly, and ask for clarification if you do not understand.

**Keep your eyes open.** You may be asked to describe victims, suspects, vehicles, or other parts of the scene.

**Do not hang up the call** until directed to do so by the call taker.

Due to the remoteness of the site, it may be necessary to liaise with the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and sub-contractors aware of any such arrangement or requirement if applicable. A list of emergency contacts is presented in Table 4-2.

Table 4-2 Emergency Contacts

Contact	Telephone no.
Emergency Services – Ambulance, Fire, Gardaí	999/112
Doctor – Longwood Health Centre	046 9555006
Hospital – Midlands Regional Hospital Mullingar	044 9340221
ESB Emergency Services	1850 372 999
Gas Networks Ireland Emergency	1850 20 50 50
Gardaí – Ballivor Garda Station	046 9546002
Health and Safety Co-ordinator - Health & Safety Services	TBC

Contact	Telephone no.
Health and Safety Authority	1890 289 389
Inland Fisheries Ireland (IFI)	1890 347 424
Project Supervisor Construction Stage (PSCS): TBC	TBC
Project Supervisor Design Stage (PSDS): MKO	091 735611
Client: Bord na Móna Powergen Ltd.	045 439000

4.3

## Procedure for Personnel Tracking

All operatives on site without any exception will have to undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.

In the event of a site operative becoming involved in an emergency situation where serious injury has occurred and hospitalisation has taken place, it will be the responsibility of the Site Manager or next in command if unavailable to contact the next of kin to inform them of the situation that exists.

4.4

## Induction Checklist

Table 4-3 provides a list of items highlighted in this ERP which must be included or obtained during the mandatory site induction of all personnel that will work on the site. This will be updated throughout the various stages of the project.

Table 4-3 Emergency Response Plan Items Applicable to the Site Induction Process

ERP Items to be included in Site Induction	Status
All personnel will be made aware of the evacuation procedure during site induction	
Due to the remoteness of the site, it may be necessary to liaise with and assist the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and sub-contractors aware of any such arrangement or requirement if applicable.	
All operatives on site without any exception will have undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.	

## 5. PROGRAMME OF WORKS

### 5.1 Decommissioning Schedule

The decommissioning phase will take approximately 3 – 9 months to complete from commencing the removal of turbines to the final reinstatement of the site.

At this time, it is not possible to determine when decommissioning will take place.

The phasing and scheduling of the main decommissioning task items are outlined in Figure 5-1 below, where the 1<sup>st</sup> of January has been shown as an indicative start date for decommissioning to commence.

ID	Task Name	Task Description	Month 1-3	Month 3-6	Month 6-9
1	Site Health and Safty				
2	Turbine Decommissioning	Disconnect Power Output			
3	Turbine Dismantling	Disassemble Turbine Components			
4	Turbine Removal	Tranpsort of all Turbine Componetns off Site			
5	Cable Removal	Remove Undeground Cables from Ducting			
6	Turbine Foundations Backfill	Reinstate Foundation Areas by Covering with Soil Material			
7	Accommodation Areas Reinstatement	Reinstate Soil Berm and Boundary Treatments			

Figure 5-1 Indicative Decommissioning Schedule

## 6. **MITIGATION PROPOSALS**

All mitigation measures relating to the pre-commencement, construction, operational and decommissioning phases of the Proposed Development are set out in the various sections of the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) prepared as part of the planning permission application to An Bord Pleanála.

This section of the Decommissioning Plan (DP) groups together all of the mitigation measures presented in the above documents. The Mitigation Measures are presented in the following pages.

By presenting the mitigation proposals in the below format, it is intended to provide an easy to audit list that can be reviewed and reported on during the decommissioning phase of the project.



Table 6-1 Mitigation Measures

Ref. No.	Reference Location	Mitigation Measure	Audit Result	Action Required
<b><i>Decommissioning Phase</i></b>				
MM1	EIAR Chapter 4	Prior to the end of the operational period the Decommissioning Plan (Appendix 4-5 of the EIAR) will be updated in line with decommissioning methodologies that may exist at the time and will agree with the competent authority at that time.		
MM2	EIAR Chapter 4 DP Section 2	On removal of turbines, turbine and mast foundations would remain underground and would be covered with earth and allowed to revegetate		
MM3	EIAR Chapter 4 DP Section 3	<p>The following mitigation measures are proposed to avoid release of hydrocarbons at the site:</p> <ul style="list-style-type: none"> <li>› Road-going vehicles will be refuelled off site wherever possible;</li> <li>› On-site refuelling will be carried out at designated refuelling areas at various locations throughout the site. Machinery will be refuelled directly by a fuel truck that will come to site as required</li> <li>› Only designated trained and competent operatives will be authorised to refuel plant on site.</li> <li>› Fuel volumes stored on site should be minimised. Any fuel storage areas will be bunded appropriately;</li> <li>› The plant used will be regularly inspected for leaks and fitness for purpose; and,</li> <li>› An emergency plan for the decommissioning phase to deal with accidental spillages will be developed (refer to EIAR Section 4). Spill kits will be available to deal with and accidental spillage in and outside the refuelling area.</li> </ul>		

Ref. No.	Reference Location	Mitigation Measure	Audit Result	Action Required
		A programme for the regular inspection of plant and equipment for leaks and fitness for purpose will be developed at the outset of the decommissioning phase.		
MM4	DP Section 3	<ul style="list-style-type: none"> <li>› Any site roads with the potential to give rise to dust will be regularly watered, as appropriate, during dry and/or windy conditions.</li> <li>› The designated public roads outside the site and along the main transport routes to the site will be regularly inspected by the Site Manager for cleanliness and cleaned as necessary.</li> <li>› Material handling systems and material storage areas will be designed and laid out to minimise exposure to wind.</li> <li>› Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods.</li> <li>› The transport of soils or other material, which has significant potential to generate dust, will be undertaken in tarpaulin-covered vehicles where necessary.</li> <li>› All site related traffic will have speed restrictions on un-surfaced roads to 15 kph.</li> <li>› Daily inspection of the site to examine dust measures and their effectiveness.</li> </ul> <p>When necessary, local sections of the public roads being used will be swept using a truck mounted vacuum sweeper.</p>		
MM5	EIAR Chapter 4  DP Section 3	<ul style="list-style-type: none"> <li>› Diesel generators will be enclosed in sound proofed containers to minimise the potential for noise impacts.</li> <li>› Plant and machinery with low inherent potential for generation of noise and/or vibration will be selected. All plant and equipment to be used on-site will be modern equipment and will</li> </ul>		

Ref. No.	Reference Location	Mitigation Measure	Audit Result	Action Required
		<p>comply with the S.I. No. 359/1996 - European Communities (Construction Plant and Equipment) (Permissible Noise Levels) (Amendment) Regulations.</p> <ul style="list-style-type: none"> <li>› Regular maintenance of plant will be carried out in order to minimise noise emissions. Particular attention will be paid to the lubrication of bearings and the integrity of silencers.</li> <li>› All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the works.</li> <li>› Compressors will be of the “sound reduced” models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers.</li> <li>› Machines, which are used intermittently, will be shut down during those periods when they are not in use.</li> <li>› Training will be provided by the Site Manager to drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation; and, <p>Local areas of the public road networking being used will be condition monitored and maintained, if necessary.</p> </li></ul>		
MM6	EIAR Chapter 4 DP Section 3	Site roadways will be in use as amenity and recreational pathways, and therefore will not be removed during decommissioning. If it were to be confirmed that the roads were not required in the future for any other useful purpose, they could be removed where required.		
MM7	EIAR Section 6	The same mitigation to prevent significant impacts on water quality and associated aquatic fauna and other terrestrial fauna during construction will be applicable to the decommissioning phase. An outline decommissioning plan is contained in the		

Ref. No.	Reference Location	Mitigation Measure	Audit Result	Action Required
	DP Section 3	CEMP, Appendix 4-3 of the EIAR. The CEMP for the project provides the details of the mitigation and best practice that will be employed to avoid any potential for significant residual effects on biodiversity during decommissioning of the proposed wind farm.		
MM8	EIAR Section 7	During the decommissioning phase, disturbance limitation measures for ornithological receptors will be as per the construction phase described.		
MM9	EIAR Section 8	Mitigation measures pertaining to land. Soils and geology applied during decommissioning activities will be similar to those applied during construction where relevant.		
MM10	EIAR Section 9 DP Section 3	During decommissioning, it will be possible to reverse or at least reduce some of the potential effects caused during construction, and to a lesser extent operation, by rehabilitating constructed areas such as turbine bases and hardstanding areas. This will be done by re-establishing vegetation, thereby reducing runoff and sediment loads.  Mitigation measures to avoid contamination by accidental fuel leakage and compaction of soil by on-site plant will be implemented as per the construction phase mitigation measures.		
	DP Section 3	The Site Manager in consultation with the ECoW will be responsible for employing the services of a suitably qualified ecologist and any other suitably qualified professionals as required throughout the decommissioning works.		
	DP Section 3	Prior to decommissioning, a suitably qualified ecologist will complete an invasive species survey of any material proposed for use as part of foundation backfilling. The invasive species survey will also be undertaken along the cable route to identify		

Ref. No.	Reference Location	Mitigation Measure	Audit Result	Action Required
		invasive species at joint bay locations where excavation to expose the cabling for removal will be required.		
	EIAR Section 7	Taking a precautionary approach, it is proposed that works will commence outside the bird nesting season (1st of March to 31st of August inclusive). Decommissioning monitoring surveys will be undertaken prior to works associated with decommissioning at the wind farm. The surveys will include a thorough walkover survey to a 500m radius of the development footprint and all works areas, where access allows. Any requirement for decommissioning works to run into the subsequent breeding season following commencement will be subject to a repeat of the decommissioning bird surveys to confirm the absence of breeding birds of conservation concern. If winter roosting or breeding activity of birds of high conservation concern is identified, the roost or nest site will be located and earmarked for monitoring at the beginning of the first winter or breeding season of the decommissioning phase. If it is found to be active during the decommissioning phase survey, no works shall be undertaken within a species-specific buffer (as per Goodship, N.M. and Furness, R.W. 2022), in line with industry best practise. No works shall be permitted within the buffer until it can be demonstrated that the roost/nest is no longer occupied		



## 7. COMPLIANCE AND REVIEW

### 7.1 Site Inspections and Environmental Audits

Routine inspections of decommissioning activities will be carried out on a daily and weekly basis by the ECoW and the Site Supervisor/Construction Manager to ensure all controls to prevent environmental impacts, relevant to the decommissioning activities taking place at the time, are in place.

Environmental inspections will ensure that the works are undertaken in compliance with this Decommissioning Plan and all other planning application documents. Only suitably trained staff will undertake environmental site inspections.

### 7.2 Auditing

An Environmental audit will first be carried out prior to the construction phase of the development to ensure the implementation of pre-construction mitigation measure and completion of baseline studies. Further environmental audits will be carried on a monthly basis during the construction phase of the project and again after the commissioning of the wind turbines.

In contrast to monitoring and inspection activities, audits are designed to shed light on the underlying causes of non-compliance, and not merely detect the non-compliance itself. In addition, audits are the main means by which system and performance improvement opportunities may be identified. Environmental audits will be carried out by the ECoW on behalf of the appointed contractor. It is important that an impartial and objective approach is adopted. Environmental audits will be conducted at planned intervals to determine whether the Decommissioning Plan is being properly implemented and maintained. The results of environmental audits will be provided to the contractor.

An audit of compliance with the decommissioning mitigation measures will be completed by the ECoW during the decommissioning phase of the development. The findings of each audit will be documented by the ECoW in an audit report within the Decommissioning Plan for the site. The audit report will be made available to Meath and Westmeath County Councils on request.

### 7.3 Environmental Compliance

The following definitions shall apply in relation to the classification of Environmental Occurrences during decommissioning of the proposed wind farm development:

**Environmental Near Miss:** An occurrence which if not controlled or due to its nature could lead to an Environmental Incident.

**Environmental Incident:** Any occurrence which has potential, due to its scale and nature, to migrate from source and have an environmental impact beyond the site boundary.

**Environmental Exceedance Event:** An environmental exceedance event occurs when monitoring results indicate that limits for a particular environmental parameter (as indicated in the Environmental Monitoring Programme) has been exceeded.

An exceedance will immediately trigger an investigation into the reason for the exceedance occurring and the application of suitable mitigation where necessary.

Exceedance events can be closed out on achieving a monitoring result below the assigned limit for a particular environmental parameter.

**Environmental Non-Compliance:** Non-fulfilment of a requirement and includes any deviations from established procedures, programs and other arrangements related to the EMP.

## 7.4 Corrective Action Procedure

A corrective action is implemented to rectify an environmental problem on-site. Corrective actions will be implemented by the Site Supervisor/Construction Manager, as advised by the Site Environmental Clerk of Works and/or other specialists input as required. Corrective actions may be required as a result of the following.

- > Environmental Audits.
- > Environmental Inspections and Reviews.
- > Environmental Monitoring.
- > Environmental Incidents; and,
- > Environmental Complaints.

A Corrective Action Notice will be used to communicate the details of the action required to the main contractor. A Corrective Action Notice is a form that describes the cause and effect of an environmental problem on site and the recommended corrective action that is required. The Corrective Action Notice, when completed, will include details of close out and follow up actions.

If an environmental problem occurs on site that requires immediate attention direct communications between the Site supervisor/Construction Manager and the ECoW will be conducted. This in turn will be passed down to the site staff involved. A Corrective Action Notice will be completed at a later date.

## 7.5 Decommissioning Plan Review

This Decommissioning Plan will be reviewed and updated prior to commencement of decommissioning works. Further updates will be completed to the plan during decommissioning works to adapt to specific situations or site conditions that are encountered that need to be considered by the plan.