



# Annual Environmental Report (AER)

## 2020

Company Name: Bord na Mona Energy Ltd (Mountdillon Group)

Licence Number: P0504-01

Address: Bord na Mona, Mountdillon Works, Lanesboro, Co Longford

Class of Activity<sup>1</sup>: 1.4

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<sup>1</sup> See Appendix I

# Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities<sup>2</sup> of large scale industrial (e.g. chemical, food processors, power plants) and waste facilities. Submitting an Annual Environmental Report (AER) is a requirement of all EPA licences.

An AER is a public document. To this end, this format has been developed for industrial and waste licence holders (other than the intensive agriculture sector) to use as a template. This is to assist any member of the public to interpret and understand the environmental performance of the licensed facility.

The AER is a **summary** of environmental information for a given year. It includes:

- Details of the licence holder's environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility's activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

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<sup>2</sup> See Appendix I

- 2) Some documents<sup>3</sup> are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

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<sup>3</sup> This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

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## Glossary

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Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
CRAMP	Closure, Restoration and Aftercare Management Plan.
ELRA	Environmental Liability Risk Assessment.
Emission Limit Value	Limits set for specified emissions, typically outlined in Schedule B of an EPA licence.
EMS	Environmental Management System.
Environmental Goal	An objective or target set by a licensee as part of an environmental management system (EMS).
Environmental Pollutant	Substance or material that due to its quantity and/or nature has a negative impact on the environment.
Facility	Any site or premises that holds an EPA industrial or waste licence.
FP	Financial Provision.
GJ	Giga joules, an international unit of energy measurement.
Groundwater	All water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.
Incident	As defined by an EPA industrial or waste licence.

Inert Waste	Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health.
List of Wastes (LoW)	A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU.
Noise Sensitive Location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Non-Renewable Resource	A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas.
Oil Separator	Separator system for light liquids (e.g. oil and petrol).
PRTR	Pollutant Release and Transfer Register.
Renewable Resource	Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.
Sanitary Waste	Waste water from toilet, washroom and canteen facilities.
Storm Water	Rain water run-off from roof and non-process areas.

Surface Water	Lakes, rivers, streams, estuaries and coastal waters.
Trigger Level	A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder.
Volatile Organic Compounds	Gases produced from solids or liquids that evaporate readily in ambient conditions.
Waste	Any substance or object which the holder discards or intends or is required to discard.

#### Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

## Declaration

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I, Cathal Brennan, confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

**Tick here**

☒



## 1) Introduction

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See below a brief description of our facility and a summary of our environmental performance this year.

- The primary activity during the reporting period was peat sales and transport. Bord na Mona permanently ceased production on a number of bogs in this licence in 2019.
- In the period there were two complaints of an environmental nature, down from the three complaints received in 2019
- In the period there two reported incidents of an environmental nature relating to dust and fires. All were of minor to limited significance and were closed out during the period.
- During the period, there were approvals sought for cultivation trials of medicinal herbs and notice provided updates on the Derryadd Windfarm Project and associated rehabilitation plans for Derryadd, Derryarogue and Lough Bannow bogs.
- During the season, 1600 Tonnes of peat were produced, down 99% on 2019
- During the period, certification to ISO9001 and ISO50001 were retained.
- During the period, there was a 34.6% decrease in waste generated and this was primarily related to power station screenings.
- In January 2021, Bord na Mona announced it was permanently ending all peat harvesting activities on its lands. Since then Bord na Mona have been engaged in the Governments Peatlands Climate Action Scheme (<https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/>), with a view to commencing applicable decommissioning & rehabilitation activities on a number of bogs under the Condition 10 obligations of this licence. In addition, Bord na Mona are continuing to sell and transport existing peat stock harvested in previous years.

## Contact Us

If you have any questions or would like further information on any aspect of this report, please contact us directly.

See below details:

Enda McDonagh,  
Bord na Mona Energy Ltd  
Leabeg  
Tullamore  
Co Offaly  
[Enda.mcdonagh@bnm.ie](mailto:Enda.mcdonagh@bnm.ie)  
0579329701  
[www.bnm.ie](http://www.bnm.ie)

## 2) How we Manage our Facility

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Bord na Mona have an Environmental Compliance Department with a team of five who manage the day to day IPC Licence requirements. This licence governs the extraction of peat and associated activities and manages emission to air, water and land.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

**Table 1 Environmental Goals**

<b>Environmental Goal</b>	<b>Target Date</b>	<b>Progress</b>
2020 Training (no of people trained)	Dec 2020	21 Employees received Environmental training
2020 Waste Management (any reduction in waste volumes on 2019)	Dec 2020	Decrease of 34.6% from 2019 mainly due to a decrease in power station screenings
2020 Energy Efficiency (any reduction in electricity/energy use)	Dec 2020	Decrease of 83.6% in energy usage from 2019
2021 Reduction of Complaints	Dec 2021	Commenced
2021 Reduction of Incidents	Dec 2021	Commenced
2021 Communication regarding decommissioning and rehabilitation	Ongoing for applicable Bogs	Commenced
2021 Review of environmental monitoring programme	Ongoing in-line with	Commenced

	PCAS & LAWPRO	
2021 Training & Awareness	May 2021	On Track
2021 Completion of Internal Audits	June 2021	On Track
2021 Decommissioning and Rehabilitation of 3 bogs in accordance with Condition 10 of the IPC Licence and in accordance with Peatlands Climate Action Scheme <a href="https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/">https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/</a>	December 2021	Not Commenced

Add rows as necessary

## Comment

Bord na Mona permanently ceased production on a number of bogs in this licence in 2019.

In January 2021, Bord na Mona announced it was permanently ending all peat harvesting activities on its lands. Since then Bord na Mona have been engaged in the Governments Peatlands Climate Action Scheme (<https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/>), with a view to commencing applicable decommissioning & rehabilitation activities on a number of bogs under the Condition 10 obligations of this licence. In addition Bord na Mona are continuing to sell and transport existing peat stock harvested in previous years.

### 3) Energy & Water

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#### Energy

##### **Explanation**

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

**Table 2      Energy Used**

<b>Energy Used (GJ)</b>	<b>Quantity</b>	<b>% Increase/ decrease on previous year</b>
Electricity	3146.09 GJ	-89%
Heavy Fuel Oil	-	
Light Fuel Oil	1,848 GJ	-93%
Natural Gas	-	
Coal / Solid Fuel	-	
Peat	-	
Renewable Biomass	-	
Renewable Energy Generated On-site	-	
<b>Total Energy Used</b>	<b>30493.09 GJ</b>	<b>-83.6%</b>

##### Comment

Bord na Mona permanently ceased production on a number of bogs in this licence in 2019

Bord na Mona Energy were certified to the energy management standard ISO50001 during the 2020 season.

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The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

**Table 3      Energy Generated**

<b>Energy Generated (GJ)</b>	<b>Quantity</b>	<b>% Increase/ decrease on previous year</b>
Renewable Energy	NA	
<b>Total Energy Generated</b>		

Comment

There are no renewable energy assets on this site.

## Water

### Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

**Table 4      Water Used**

<b>Source of Water Used</b>	<b>Quantity (m<sup>3</sup>/year)</b>	<b>% Increase/decrease on previous year</b>
Groundwater		
Surface Water	0	
Public Supply		
Recycled Water	0	
Rainwater	0	
<b>Total Water Used</b>		

### Comment

Water is not used in any of the peat harvesting or transport processes. The only water used is that required to provide associated offices and workshop welfare facilities (canteen/toilets)



## 4) Environmental Complaints

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### **Explanation**

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us<sup>4</sup> directly. You can also contact the EPA<sup>5</sup> if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

**Table 5      Summary of All Environmental Complaints Received in**

Type of Complaint	Number of Complaints Received	Number Closed
Odour / Smells		
Noise		
Dust	2	2
Water Quality		
Air Quality		
Waste		
Litter		
Vermin/Flies/Birds		
Soil Contamination		
Vibration		
Other		

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<sup>4</sup> See Section 1, Introduction – Contact Us

<sup>5</sup> If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

## Comment

As required environmental complaints are reportable to the EPA and as such must be investigated. In the 2020 reporting period, this licence had 2 complaints received and there were none carried over into 2021. The main complaints were in relation to dust nuisance. At present there are no complaints from 2020 still open.

## 5) Environmental Incidents

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### **Explanation**

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.

**Table 6      Number of Environmental Incidents**

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Abatement Equipment Offline					
Breach of Ambient ELV	1				
Breach of Emission Limit					
Explosion					
Fire	1				
Monitoring Equipment Failure					
Odour					
Spillage					
Breach of trigger Level					
Uncontrolled Release					

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Other					

#### Comment

As required, incidents of an environmental nature are reportable to the EPA and as such must be investigated. In the 2020 reporting period, this licence recorded and reported 2 incidents. These incidents we related to an Emission Limit Value for dust, and one relating to a bog fire and related smoke nuisance.

## 6) Our Environmental Emissions

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### **Explanation**

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Waste water
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA<sup>6</sup>.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

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<sup>6</sup> See section 5, Incidents

## Storm Water

### **Explanation**

Storm water is rain water run-off from roof and non-process areas of a facility, e.g. car parks, and generally shall not contain any pollution.

Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

### **1. Storm water from our facility is managed prior to release by;**

Either direct to drain where it is roof water only, or via petrol/oil interceptor.

### **2. Storm water from our facility is released into the following water bodies:**

Lehery River, Cloontuskert River, Inny River

**Table 7      Summary of Storm Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant<sup>7</sup></b>	<b>Comment</b>
COD	21	100%	

Add rows as necessary

**Comment**

As required by the licence, stormwater is required to be separated where possible from process/non-process areas. Where this is not possible, stormwater is managed via oil-interceptors which are inspected on a monthly basis and sampled for associated discharges each month. Other than visual observations, the other main criteria to define adequate treatment is COD mg/l so this and visual inspections dictate when the interceptor is cleaned by an approved hazardous waste contractor.

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<sup>7</sup> % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.



## Waste Water

### Explanation

There are two types of waste water that can be produced:

- Process waste water produced from the activities and;
- Sanitary waste water from toilets, washrooms and canteens.

Our EPA licence requires us to manage our waste water on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the waste water produced from our activities, where it is released and the results of monitoring this year.

### **1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody;**

All production area runoff is treated via an associated silt pond designed, inspected and maintained in accordance with condition 6 of the IPC Licence

### **2. Treated waste water from our facility is released into the following water bodies:**

Feorish River, Drinagh River, Cloontuskert Outfall, Moher Outfall, Cloonaddra Outfall, Cloonkeel Outfall, Ballinakill River, Grillagh River, Leherly River, Clondra River, Fallon River, Ballyminion River, Derryoghill River, Derrymacar River, Billberry River, Inny River, Camlin River.

+

**Table 8      Summary of Waste Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant</b>	<b>Comment</b>
Suspended Solids	237	100%	
Ammonia	88	100%	
Total Solids	237	NA	
Total Phosphorus	88	NA	
pH	88	NA	
Colour	88	NA	
COD	109	100%	

Add rows as necessary

#### Comment

Licence requirements are quarterly grab samples on a selected number of silt pond outlets as per condition 6.2 and one 24hr flow proportional composite sampler at Corlea bog.

The emission limit values are 35mg/l suspended solids, 1.42mg/l total ammonia and 100mg/l COD. There were no exceedances for SS in 2020 the same as 2019, there were no trigger level exceedances for COD or Ammonia in 2020, in 2019 there were 3 trigger level exceedances for Ammonia and 2 for COD.

## Air

### Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

### 1. We monitor air emissions from the following number of emission points at our facility.

DM-05 Derryadd Bog, DM-06 Derryadd Bog

**Table 9      Summary of Air Emissions Monitoring**

Parameter measured	No. of Samples	% Compliant	Comment
Fugitive Dust	6	84%	There was one exceedance, which was caused by a storm event and associated high winds.

Add rows as necessary

Comment

The Bergerhoff dust gauges were deployed three times in 2020.

**Table 10      Summary of Odour Assessments Carried Out**

<b>Assessment Conducted By</b>	<b>No. of Odour Assessments</b>	<b>% Compliant<sup>8</sup></b>	<b>Comment</b>
Licence Holder	NA		Not required
EPA	NA		Not required

Add rows where necessary

Comment

There are no odour emissions of note from the activity, no requirements to monitor and no associated complaints.

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<sup>8</sup> A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at <http://www.epa.ie/pubs/advice/air/emissions/ag5-odourassessment.html>

## Fugitive Solvent Emissions

Are you are required to monitor fugitive solvent air emissions from your facility?

Yes ☐

No ☒

### Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations<sup>9</sup>. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

**Table 11 Summary of Fugitive Solvent Emissions**

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant

Comment

100 word limit

<sup>9</sup> See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

## Groundwater

### Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

**1. Do you have a groundwater monitoring programme in place?**

Yes ☐

No ☒

**2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?**

Yes ☐

No ☒

**Table 12 List of Groundwater Pollutants Identified**

Pollutants

Add rows as necessary

**3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.**

150 word limit

Comment

There are no licence requirements to monitor groundwater from the activity.



## Noise

### Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

#### 1. We conducted noise monitoring on the following dates this year:

NA

#### 2. Was the noise monitoring carried out at:

- i. the boundary of our facility,
- ii. noise sensitive locations off-site, or
- iii. both?

NA

#### 3. Were measured noise levels compliant with your EPA licence limits?

Yes ☐

No ☐

If No, we took the following actions to address the noise level exceedances?

NA

#### Comment

There are no licence requirements to monitor noise from the activity, or any complaints regarding noise impact.

## 7) Waste

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### Waste Generated

#### Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in table 13 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

**Table 13      Waste Generated**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	5.74	9.96% increase	100%
Non-Hazardous	2501	44.6% decrease	98.4%
Inert			
<b>Total Tonnes</b>	2506	44.59 decrease	99.2%

#### Comment

The main wastes generated from this activity are Waste Oil, Oil Filters, Oily Rags, Batteries, Interceptor Waste, Parts Wash, Polythene, Scrap Metal, Silt Pond Waste and Peat Screenings all of which are recycled. The waste generated for landfill was from Waste skips.?

## Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes ☐

No ☒

### Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 14 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

**Table 14     Waste Accepted**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous			
Non- Hazardous			
Inert			
<b>Total Tonnes</b>			

Comment

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## 8) Financial Provision

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### Explanation

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high risk facility<sup>10</sup> by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes ☐

No ☒

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

Not required under the Licence. However Bog Rehabilitation Plans are required to be submitted to the EPA. These were submitted to the Agency in May 2018. Since then, the EPA issued new Guidance on the process of preparing and implementing a bog rehabilitation plan and under the Peatlands Climate Action Plan [www.bnmecas.ie](http://www.bnmecas.ie) & <https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/>, Bord na Mona are preparing new rehabilitation plans to be submitted by March/April 2021.

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

Not required under the Licence.

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<sup>10</sup> See Appendix II

4. Has there been any significant changes on your site since the last agreements?

Yes ☐

No ☒

If yes, have you submitted details to the EPA?

Yes ☒

No ☐

N/A ☐

## Appendix I

### Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

Class 1	Minerals and other materials
Class 2	Energy
Class 3	Metals
Class 4	Mineral fibres and glass
Class 5	Chemicals
Class 6	Intensive Agriculture <sup>11</sup>
Class 7	Food and drink
Class 8	Wood, paper, textiles and leather
Class 9	Fossil fuels
Class 10	Cement, lime and magnesium oxide
Class 11	Waste

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<sup>11</sup> This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at <http://www.epa.ie/pubs/advice/aerprtr/aerguid/>

Class 12      Surface Coatings

Class 13      Other Activities

## Appendix II

### High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

### NOTE:

This list is subject to change.

See the link below for further information.

<http://www.epa.ie/pubs/advice/licensee/fp/epaapproachtoenvironmentalliabilitiesandfinancialprovision.html>



# Annual Environmental Report (AER) 2021

Company Name: Bord na Móna Energy Ltd (Mountdillon Group)

Licence Number: P0504-01

Address: Bord na Móna, Mountdillon Works, Lanesboro, Co Longford

Class of Activity<sup>1</sup>: 1.4

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<sup>1</sup> See Appendix I

# Purpose of this Report

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- Details of the licence holder's environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility's activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

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<sup>2</sup> See Appendix I



- 2) Some documents<sup>3</sup> are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

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<sup>3</sup> This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

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## Glossary

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Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
CRAMP	Closure, Restoration and Aftercare Management Plan.
ELRA	Environmental Liability Risk Assessment.
Emission Limit Value	Limits set for specified emissions, typically outlined in Schedule B of an EPA licence.
EMS	Environmental Management System.
Environmental Goal	An objective or target set by a licensee as part of an environmental management system (EMS).
Environmental Pollutant	Substance or material that due to its quantity and/or nature has a negative impact on the environment.
Facility	Any site or premises that holds an EPA industrial or waste licence.
FP	Financial Provision.
GJ	Giga joules, an international unit of energy measurement.
Groundwater	All water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.
Incident	As defined by an EPA industrial or waste licence.

Inert Waste	Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health.
List of Wastes (LoW)	A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU.
Noise Sensitive Location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Non-Renewable Resource	A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas.
Oil Separator	Separator system for light liquids (e.g. oil and petrol).
PRTR	Pollutant Release and Transfer Register.
Renewable Resource	Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.
Sanitary Waste	Waste water from toilet, washroom and canteen facilities.
Storm Water	Rain water run-off from roof and non-process areas.

Surface Water	Lakes, rivers, streams, estuaries and coastal waters.
Trigger Level	A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder.
Volatile Organic Compounds	Gases produced from solids or liquids that evaporate readily in ambient conditions.
Waste	Any substance or object which the holder discards or intends or is required to discard.

#### Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

## Declaration

---

I, Cathal Brennan, confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

**Tick here**

☒

## 1) Introduction

---

See below a brief description of our facility and a summary of our environmental performance this year.

- During the reporting period, Bord na Móna notified the Agency, that in line with its Brown to Green strategy, it had decided to end all peat harvesting on Bord na Móna lands. It is now progressing with its requirements under Condition 10 of the relevant IPC Licences to decommission and rehabilitate available bogs under the Peatlands Climate Action Scheme PCAS (February 2021).
- During the reporting period the primary activities were peat sales of existing stock and decommissioning and rehabilitation of several bogs in this IPC Licence
- During the reporting period, 1017 Ha's or 97% of peatlands at Edera, Derrycolumb and Derrycashel Bogs were rehabilitated with some of this works extending into the 2022 period.
- During the reporting period 931 Ha's of peatlands were decommissioned, with plant, equipment and waste materials removed at these bogs
- In the period, there was 3 complaints of an environmental nature, up from 2 complaints received in 2020
- In the period, there was 1 reported incident of an environmental nature relating to exceedance in COD trigger level. This was of minor significance and was closed out during the period.
- During the period, there were notifications submitted regarding water quality results and requests in relation to composite samplers.
- During 2021, Rehabilitation plans, maps and associated assessments were submitted to the Agency for Edera, Derrycolumb, and Derrycashel Bogs and these are available to view at <https://www.bnmpcas.ie/bogs-peatlands-climate-action-scheme/>
- Monthly water quality sampling data was submitted for sampling undertaken during the period, which included peatlands prior to the rehabilitation undertaken in 2021 and to provide baseline data for peatlands to be rehabilitated in subsequent years.
- During the period, certification to ISO9001 was retained.

- During the period, there was a 16.03% increase in waste generated, mostly related to a decrease in activity but an increase in decommissioning.

## Contact Us

If you have any questions or would like further information on any aspect of this report, please contact us directly.

See below details:

Enda McDonagh,  
Bord na Mona Energy Ltd  
Leabeg  
Tullamore  
Co Offaly  
[www.bnm.ie](http://www.bnm.ie)



## 2) How we Manage our Facility

---

Bord na Mona have an Environmental Compliance Department with a team of five who manage the day to day IPC Licence requirements. This licence governs the extraction of peat and associated activities and manages emission to air, water and land.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

**Table 1 Environmental Goals**

<b>Environmental Goal</b>	<b>Target Date</b>	<b>Progress</b>
Training/awareness for all area leaders and operatives in advance of decommissioning and rehabilitation of the 2022 bogs.	May 2022	Underway
Waste Management – Removal of all waste that are deemed a risk the environment in bogs scheduled to be decommissioned in 2022	Dec 2022	Underway
Communication of Decommissioning and Rehabilitation plans to all neighbours within 1km of the proposed activity for 2022	June 2022	5 Bogs have had letters and associated details delivered
Completion of internal audits/inspections of applicable bogs scheduled for decommissioning and rehabilitation as required by condition 10 and the Peatlands Climate Action Scheme	September 2022	Not commenced yet
Maintain surface water quality compliance with emission limit values for Suspended	December 2022	Underway

Solids during the proposed decommissioning and rehabilitation programme.		
Decommissioning and Rehabilitation of 5 bogs in accordance with Condition 10 of the IPC Licence and in accordance with Peatlands Climate Action Scheme <a href="https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/">https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/</a>	December 2022 to March 2023	To commence on the 1 <sup>st</sup> April 2022

Add rows as necessary

### Comment

As peat extraction on all bogs in this licence ceased in 2020, all environmental goals for 2022 are linked to the remaining bog activity which is the decommissioning and rehabilitation of the 5 bogs planned for 2022.

### 3) Energy & Water

---

#### Energy

##### **Explanation**

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

**Table 2      Energy Used**

<b>Energy Used (GJ)</b>	<b>Quantity</b>	<b>% Increase/ decrease on previous year</b>
Electricity	2772.92 GJ	-23.87%
Heavy Fuel Oil	-	
Light Fuel Oil	7751 GJ	319.21%
Natural Gas	-	
Coal / Solid Fuel	-	
Peat	-	
Renewable Biomass	-	
Renewable Energy Generated On-site	-	
<b>Total Energy Used</b>	10523.92 GJ	295.34%

##### Comment

Although electricity usage decreased, fuel usage increased in 2021. This was mainly due to PCAS bog rehabilitation and decommissioning work.

The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

**Table 3      Energy Generated**

<b>Energy Generated (GJ)</b>	<b>Quantity</b>	<b>% Increase/ decrease on previous year</b>
Renewable Energy	NA	
<b>Total Energy Generated</b>		

Comment

There are no renewable energy assets on this site.

## Water

### Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

**Table 4      Water Used**

<b>Source of Water Used</b>	<b>Quantity (m<sup>3</sup>/year)</b>	<b>% Increase/decrease on previous year</b>
Groundwater		
Surface Water	0	
Public Supply		
Recycled Water	0	
Rainwater	0	
<b>Total Water Used</b>		

### Comment

Water is not used in any of the peat harvesting or transport processes. The only water used is that required to provide associated offices and workshop welfare facilities (canteen/toilets)

## 4) Environmental Complaints

---

### **Explanation**

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us<sup>4</sup> directly. You can also contact the EPA<sup>5</sup> if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

**Table 5      Summary of All Environmental Complaints Received in**

<b>Type of Complaint</b>	<b>Number of Complaints Received</b>	<b>Number Closed</b>
<b>Odour / Smells</b>		
<b>Noise</b>		
<b>Dust</b>	1	1
<b>Water Quality</b>	2	2
<b>Air Quality</b>		
<b>Waste</b>		
<b>Litter</b>		
<b>Vermin/Flies/Birds</b>		
<b>Soil Contamination</b>		
<b>Vibration</b>		
<b>Other</b>	3	3

---

<sup>4</sup> See Section 1, Introduction – Contact Us

<sup>5</sup> If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

## Comment

As required environmental complaints are reportable to the EPA and as such must be investigated. In the 2021 reporting period, this licence had 3 complaints received and there were none carried over into 2022. The main complaints were in relation to potential dust nuisance. At present there are no complaints from 2021 still open.

## 5) Environmental Incidents

---

### **Explanation**

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.



**Table 6      Number of Environmental Incidents**

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Abatement Equipment Offline					
Breach of Ambient ELV					
Breach of Emission Limit					
Explosion					
Fire					
Monitoring Equipment Failure					
Odour					
Spillage					
Breach of trigger Level	1				
Uncontrolled Release					

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Other					

#### Comment

As required, incidents of an environmental nature are reportable to the EPA and as such must be investigated. In the 2021 reporting period, this licence recorded and reported 1 incident. This incident was related to a trigger level breach for COD.

## 6) Our Environmental Emissions

---

### **Explanation**

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Waste water
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA<sup>6</sup>.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

---

<sup>6</sup> See section 5, Incidents

## Storm Water

### **Explanation**

Storm water is rain water run-off from roof and non-process areas of a facility, e.g. car parks, and generally shall not contain any pollution. Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

### **1. Storm water from our facility is managed prior to release by;**

Either direct to drain where it is roof water only, or via petrol/oil interceptor.

### **2. Storm water from our facility is released into the following water bodies:**

Lehery River, Cloontuskert River, Inny River

**Table 7      Summary of Storm Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant<sup>7</sup></b>	<b>Comment</b>
COD	22	100%	

Add rows as necessary

**Comment**

As required by the licence, stormwater is required to be separated where possible from process/non-process areas. Where this is not possible, stormwater is managed via oil-interceptors which are inspected on a monthly basis and sampled for associated discharges each month. Other than visual observations, the other main criteria to define adequate treatment is COD mg/l so this and visual inspections dictate when the interceptor is cleaned by an approved hazardous waste contractor.

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<sup>7</sup> % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.

## Waste Water

### Explanation

There are two types of waste water that can be produced:

- Process waste water produced from the activities and;
- Sanitary waste water from toilets, washrooms and canteens.

Our EPA licence requires us to manage our waste water on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the waste water produced from our activities, where it is released and the results of monitoring this year.

### **1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody;**

All production area runoff is treated via an associated silt pond designed, inspected and maintained in accordance with condition 6 of the IPC Licence

### **2. Treated waste water from our facility is released into the following water bodies:**

Feorish River, Drinagh River, Cloontuskert Outfall, Moher Outfall, Cloonaddra Outfall, Cloonkeel Outfall, Ballinakill River, Grillagh River, Leherly River, Clondra River, Fallon River, Ballyminion River, Derryoghill River, Derrymacar River, Billberry River, Inny River, Camlin River.

+

**Table 8      Summary of Waste Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant</b>	<b>Comment</b>
Suspended Solids	154	100%	
Ammonia	92	100%	
Total Solids	154	NA	
Total Phosphorus	92	NA	
pH	92	NA	
Colour	92	NA	
COD	115	100%	

Add rows as necessary

#### Comment

Licence requirements are quarterly grab samples on a selected number of silt pond outlets as per condition 6.2 and one 24hr flow proportional composite sampler at Corlea bog.

The emission limit values are 35mg/l suspended solids, 1.42mg/l total ammonia and 100mg/l COD. There were no exceedances for SS in 2021 the same as 2020, there was one trigger level exceedances for COD and there was no exceedances for Ammonia in 2021.

## Air

### Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

### 1. We monitor air emissions from the following number of emission points at our facility.

DM-05 Derryadd Bog, DM-06 Derryadd Bog

**Table 9 Summary of Air Emissions Monitoring**

Parameter measured	No. of Samples	% Compliant	Comment
Fugitive Dust	6	100%	There were no exceedances, for air emissions in 2021

Add rows as necessary

### Comment

The Bergerhoff dust gauges were deployed three times in 2021.



**Table 10      Summary of Odour Assessments Carried Out**

<b>Assessment Conducted By</b>	<b>No. of Odour Assessments</b>	<b>% Compliant<sup>8</sup></b>	<b>Comment</b>
Licence Holder	NA		Not required
EPA	NA		Not required

Add rows where necessary

Comment

There are no odour emissions of note from the activity, no requirements to monitor and no associated complaints.

---

<sup>8</sup> A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at <http://www.epa.ie/pubs/advice/air/emissions/ag5-odourassessment.html>

## Fugitive Solvent Emissions

Are you are required to monitor fugitive solvent air emissions from your facility?

Yes ☐

No ☒

### Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations<sup>9</sup>. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

**Table 11 Summary of Fugitive Solvent Emissions**

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant

Comment

N/A

<sup>9</sup> See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

## Groundwater

### Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

**1. Do you have a groundwater monitoring programme in place?**

Yes ☐

No ☒

**2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?**

Yes ☐

No ☒

**Table 12 List of Groundwater Pollutants Identified**

Pollutants

Add rows as necessary

**3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.**

N/A

Comment

There are no licence requirements to monitor groundwater from the activity.

## Noise

### Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

#### 1. We conducted noise monitoring on the following dates this year:

N/A

#### 2. Was the noise monitoring carried out at:

- i. the boundary of our facility,
- ii. noise sensitive locations off-site, or
- iii. both?

N/A

#### 3. Were measured noise levels compliant with your EPA licence limits?

Yes ☐

No ☐

If No, we took the following actions to address the noise level exceedances?

N/A

#### Comment

There are no licence requirements to monitor noise from the activity, or any complaints regarding noise impact.

## 7) Waste

---

### Waste Generated

#### Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in table 13 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

**Table 13      Waste Generated**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	18.01	213.76% increase	100%
Non-Hazardous	2891.43	15.58% increase	93.81%
Inert			
<b>Total Tonnes</b>	2909.44	16.03% increase	99.45%

#### Comment

The main wastes generated from this activity are Waste Oil, Oil Filters, Oily Rags, Batteries, Interceptor Waste, Parts Wash, Polythene, Scrap Metal, Silt Pond Waste and Peat Screenings all of which are recycled. The waste generated for landfill was from Waste skips.

## Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes ☐

No ☒

### Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 14 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

**Table 14     Waste Accepted**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous			
Non- Hazardous			
Inert			
<b>Total Tonnes</b>			

Comment

N/A

## 8) Financial Provision

---

### Explanation

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high risk facility<sup>10</sup> by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes ☐

No ☒

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

Not required under the licence. However, the equivalent Bog Rehabilitation Plans, which include closure, restoration and aftercare are being submitted to the Agency in advance of any decommissioning and rehabilitation.

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

Not required under the licence.

4. Has there been any significant changes on your site since the last agreements?

Yes ☐

No ☒

---

<sup>10</sup> See Appendix II



If yes, have you submitted details to the EPA?

Yes ☐

No ☐

N/A ☒

# Appendix I

## Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

Class 1	Minerals and other materials
Class 2	Energy
Class 3	Metals
Class 4	Mineral fibres and glass
Class 5	Chemicals
Class 6	Intensive Agriculture <sup>11</sup>
Class 7	Food and drink
Class 8	Wood, paper, textiles and leather
Class 9	Fossil fuels
Class 10	Cement, lime and magnesium oxide
Class 11	Waste
Class 12	Surface Coatings
Class 13	Other Activities

---

<sup>11</sup> This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at <http://www.epa.ie/pubs/advice/aerprtr/aerguid/>

# Appendix II

## High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

### NOTE:

This list is subject to change.

See the link below for further information.

<http://www.epa.ie/pubs/advice/licensee/fp/epaapproachtoenvironmentalliabilitiesandfinancialprovision.html>



# Annual Environmental Report (AER) 2022

Company Name: Bord na Móna Energy Ltd (Mountdillon Group)

Licence Number: P0504-01

Address: Bord na Móna, Mountdillon Works, Lanesboro, Co Longford

Class of Activity<sup>1</sup>: 1.4

---

<sup>1</sup> See Appendix I

# Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities<sup>2</sup> of large scale industrial (e.g. chemical, food processors, power plants) and waste facilities. Submitting an Annual Environmental Report (AER) is a requirement of all EPA licences.

An AER is a public document. To this end, this format has been developed for industrial and waste licence holders (other than the intensive agriculture sector) to use as a template. This is to assist any member of the public to interpret and understand the environmental performance of the licensed facility.

The AER is a **summary** of environmental information for a given year. It includes:

- Details of the licence holder's environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility's activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

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<sup>2</sup> See Appendix I

- 2) Some documents<sup>3</sup> are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

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<sup>3</sup> This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

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## Glossary

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Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
CRAMP	Closure, Restoration and Aftercare Management Plan.
ELRA	Environmental Liability Risk Assessment.
Emission Limit Value	Limits set for specified emissions, typically outlined in Schedule B of an EPA licence.
EMS	Environmental Management System.
Environmental Goal	An objective or target set by a licensee as part of an environmental management system (EMS).
Environmental Pollutant	Substance or material that due to its quantity and/or nature has a negative impact on the environment.
Facility	Any site or premises that holds an EPA industrial or waste licence.
FP	Financial Provision.
GJ	Giga joules, an international unit of energy measurement.
Groundwater	All water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.
Incident	As defined by an EPA industrial or waste licence.

Inert Waste	Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health.
List of Wastes (LoW)	A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU.
Noise Sensitive Location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Non-Renewable Resource	A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas.
Oil Separator	Separator system for light liquids (e.g. oil and petrol).
PRTR	Pollutant Release and Transfer Register.
Renewable Resource	Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.
Sanitary Waste	Waste water from toilet, washroom and canteen facilities.
Storm Water	Rain water run-off from roof and non-process areas.



Surface Water	Lakes, rivers, streams, estuaries and coastal waters.
Trigger Level	A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder.
Volatile Organic Compounds	Gases produced from solids or liquids that evaporate readily in ambient conditions.
Waste	Any substance or object which the holder discards or intends or is required to discard.

#### Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

## Declaration

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I, Cathal Brennan, confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

**Tick here**

☒

## 1) Introduction

---

See below a brief description of our facility and a summary of our environmental performance this year.

- During the reporting period the primary activities were peat sales of existing stock and decommissioning and rehabilitation of several bogs in this IPC Licence.
- During the reporting period, 881 Ha's or 38% of peatlands at Edera, Clooneeny, Begnagh, Derraghan, Glenlough and Knappogue Bogs were rehabilitated with the balance of this works extending into the 2023 period.
- During the reporting period 931 Ha's of peatlands were decommissioned, with plant, equipment and waste materials removed from these bogs.
- In the period, there was 2 complaints of an environmental nature, down from 3 complaints received in 2021.
- In the period, there was 3 reported incidents of an environmental nature relating to exceedances in the COD trigger level. This was of minor significance and was closed out during the period.
- During the period, there were notifications submitted regarding general compliance reporting obligations and the 2021 Annual Environmental Reports.
- During 2022, Rehabilitation plans, maps and associated assessments were submitted to the Agency for Clooneeny, Begnagh, Derraghan, Glenlough and Knappogue Bogs and these are available to view at <https://www.bnmpcas.ie/bogs-peatlands-climate-action-scheme/>
- During the period Bord na Mona retained certification to ISO9001 for the decommissioning and rehabilitation of peatlands to support the climate action scheme.
- During 2022, there was a 16.03% increase in waste generated, mostly related to a decrease in activity but an increase in decommissioning.

## Contact Us

If you have any questions or would like further information on any aspect of this report, please contact us directly.

See below details:

Enda McDonagh,  
Bord na Mona Energy Ltd  
Leabeg  
Tullamore  
Co Offaly  
[www.bnm.ie](http://www.bnm.ie)

## 2) How we Manage our Facility

---

Bord na Mona have an Environmental Compliance Department with a team of five who manage the day to day IPC Licence requirements. This licence governs the extraction of peat and associated activities and manages emission to air, water and land.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

**Table 1 Environmental Goals**

<b>Environmental Goal</b>	<b>Target Date</b>	<b>Progress</b>
Training/awareness for all area leaders and operatives in advance of decommissioning and rehabilitation of the 2023 bogs.	May 2023	Underway
Waste Management – Removal of all waste that are deemed a risk the environment in bogs scheduled to be decommissioned in 2023	Dec 2023	Underway
Communication of Decommissioning and Rehabilitation plans to all neighbours within 1km of the proposed activity for 2023	June 2023	5 Bogs have had letters and associated details delivered
Completion of internal audits/inspections of applicable bogs scheduled for decommissioning and rehabilitation as required by condition 10 and the Peatlands Climate Action Scheme	September 2023	Audit completed at Edera bog in 2022 with new bogs defined for 2023

Maintain surface water quality compliance with emission limit values for Suspended Solids during the proposed decommissioning and rehabilitation programme.	December 2023	Underway
Commence Decommissioning and Rehabilitation of 2023 bogs in accordance with Condition 10 of the IPC Licence and in accordance with Peatlands Climate Action Scheme <a href="https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/">https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/</a>	January to December 2023	To commence once approved by NPWS and EPA

Add rows as necessary

#### Comment

As peat extraction on all bogs in this licence ceased in 2020, all environmental goals for 2023 are linked to the remaining bog activity which is the decommissioning and rehabilitation of the bogs planned for 2023.

### 3) Energy & Water

---

#### Energy

##### **Explanation**

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

**Table 2      Energy Used**

<b>Energy Used (GJ)</b>	<b>Quantity</b>	<b>% Increase/ decrease on previous year</b>
Electricity	2718.55 GJ	-1.96% decrease
Heavy Fuel Oil	-	
Light Fuel Oil	11070.9 GJ	42.8 % increase
Natural Gas	-	
Coal / Solid Fuel	-	
Peat	-	
Renewable Biomass	-	
Renewable Energy Generated On-site	-	
<b>Total Energy Used</b>	13789.45 GJ	31% increase

##### Comment

Although electricity usage decreased, fuel usage increased in 2022. Energy use fluctuations are mainly defined by ceasing peat extraction activities in 2020, peat stock depletion and ramping up of decommissioning and rehabilitation activity.

The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

**Table 3      Energy Generated**

<b>Energy Generated (GJ)</b>	<b>Quantity</b>	<b>% Increase/ decrease on previous year</b>
Renewable Energy	NA	
<b>Total Energy Generated</b>		

Comment

There are no renewable energy assets on this site.



## Water

### Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

**Table 4      Water Used**

<b>Source of Water Used</b>	<b>Quantity (m<sup>3</sup>/year)</b>	<b>% Increase/decrease on previous year</b>
Groundwater		
Surface Water	0	
Public Supply		
Recycled Water	0	
Rainwater	0	
<b>Total Water Used</b>		

### Comment

Water is not used in any of the peat harvesting or transport processes. The only water used is that required to provide associated offices and workshop welfare facilities (canteen/toilets)

## 4) Environmental Complaints

---

### **Explanation**

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us<sup>4</sup> directly. You can also contact the EPA<sup>5</sup> if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

**Table 5      Summary of All Environmental Complaints Received in**

Type of Complaint	Number of Complaints Received	Number Closed
Odour / Smells		
Noise		
Dust		
Water Quality	2	2
Air Quality		
Waste		
Litter		
Vermin/Flies/Birds		
Soil Contamination		
Vibration		
Other		

---

<sup>4</sup> See Section 1, Introduction – Contact Us

<sup>5</sup> If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

## Comment

As required, environmental complaints are reportable to the EPA and as such must be investigated. In the 2022 reporting period, this licence had 2 complaints received and there were none carried over into 2023. The main complaints were in relation to potential water quality issues. At present there are no complaints from 2022 still open.

## 5) Environmental Incidents

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### **Explanation**

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.

**Table 6      Number of Environmental Incidents**

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Abatement Equipment Offline					
Breach of Ambient ELV					
Breach of Emission Limit					
Explosion					
Fire					
Monitoring Equipment Failure					
Odour					
Spillage					
Breach of trigger Level	3				
Uncontrolled Release					

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Other					

#### Comment

As required, incidents of an environmental nature are reportable to the EPA and as such must be investigated. In the 2022 reporting period, this licence recorded and reported 3 incidents. These incidents were related to trigger level breaches for COD.

## 6) Our Environmental Emissions

---

### **Explanation**

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Waste water
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA<sup>6</sup>.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

---

<sup>6</sup> See section 5, Incidents

## Storm Water

### **Explanation**

Storm water is rain water run-off from roof and non-process areas of a facility, e.g. car parks, and generally shall not contain any pollution.

Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

### **1. Storm water from our facility is managed prior to release by;**

Either direct to drain where it is roof water only, or via petrol/oil interceptor.

### **2. Storm water from our facility is released into the following water bodies:**

Lehery River, Cloontuskert River, Inny River



**Table 7      Summary of Storm Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant<sup>7</sup></b>	<b>Comment</b>
COD	11	100%	

Add rows as necessary

**Comment**

As required by the licence, stormwater is required to be separated where possible from process/non-process areas. Where this is not possible, stormwater is managed via oil-interceptors which are inspected on a monthly basis and sampled for associated discharges each month. Other than visual observations, the other main criteria to define adequate treatment is COD mg/l so this and visual inspections dictate when the interceptor is cleaned by an approved hazardous waste contractor.

---

<sup>7</sup> % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.

## Waste Water

### Explanation

There are two types of waste water that can be produced:

- Process waste water produced from the activities and;
- Sanitary waste water from toilets, washrooms and canteens.

Our EPA licence requires us to manage our waste water on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the waste water produced from our activities, where it is released and the results of monitoring this year.

### **1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody;**

All production area runoff is treated via an associated silt pond designed, inspected and maintained in accordance with condition 6 of the IPC Licence

### **2. Treated waste water from our facility is released into the following water bodies:**

Feorish River, Drinagh River, Cloontuskert Outfall, Moher Outfall, Cloonaddra Outfall, Cloonkeel Outfall, Ballinakill River, Grillagh River, Leherly River, Clondra River, Fallon River, Ballyminion River, Derryoghill River, Derrymacar River, Billberry River, Inny River, Camlin River.

+

**Table 8      Summary of Waste Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant</b>	<b>Comment</b>
Suspended Solids	89	100%	
Ammonia	75	100%	
Total Solids	89	NA	
Total Phosphorus	75	NA	
pH	75	NA	
Colour	75	NA	
COD	86	96.5%	

Add rows as necessary

#### Comment

Licence requirements are quarterly grab samples on a selected number of silt pond outlets as per condition 6.2 and one 24hr flow proportional composite sampler at Corlea bog for 6 months and Clooneeny bog for 6 months. The emission limit values are 35mg/l suspended solids, 1.42mg/l total ammonia and 100mg/l COD. There were no exceedances for Suspended Solids in 2022, the same as 2021 and there was three trigger level exceedances for COD with there were no exceedances for Ammonia.

## Air

### Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

### 1. We monitor air emissions from the following number of emission points at our facility.

As peat production has ceased, no dust monitoring took place during 2022.

**Table 9      Summary of Air Emissions Monitoring**

Parameter measured	No. of Samples	% Compliant	Comment
N/A			

Add rows as necessary

### Comment

Due to the cessation of peat production, it is no longer necessary to monitor for air emissions

**Table 10      Summary of Odour Assessments Carried Out**

<b>Assessment Conducted By</b>	<b>No. of Odour Assessments</b>	<b>% Compliant<sup>8</sup></b>	<b>Comment</b>
Licence Holder	NA		Not required
EPA	NA		Not required

Add rows where necessary

Comment

There are no odour emissions of note from the activity, no requirements to monitor and no associated complaints.

---

<sup>8</sup> A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at <http://www.epa.ie/pubs/advice/air/emissions/ag5-odourassessment.html>

## Fugitive Solvent Emissions

Are you are required to monitor fugitive solvent air emissions from your facility?

Yes ☐

No ☒

### Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations<sup>9</sup>. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

**Table 11 Summary of Fugitive Solvent Emissions**

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant

Comment

N/A

<sup>9</sup> See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

## Groundwater

### Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

#### 1. Do you have a groundwater monitoring programme in place?

Yes ☐

No ☒

#### 2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?

Yes ☐

No ☒

**Table 12 List of Groundwater Pollutants Identified**

Pollutants

Add rows as necessary

**3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.**

N/A

Comment

There are no licence requirements to monitor groundwater from the activity.



## Noise

### Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

#### 1. We conducted noise monitoring on the following dates this year:

N/A

#### 2. Was the noise monitoring carried out at:

- i. the boundary of our facility,
- ii. noise sensitive locations off-site, or
- iii. both?

N/A

#### 3. Were measured noise levels compliant with your EPA licence limits?

Yes ☐

No ☐

If No, we took the following actions to address the noise level exceedances?

N/A

#### Comment

There are no licence requirements to monitor noise from the activity, or any complaints regarding noise impact.

## 7) Waste

---

### Waste Generated

#### Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in table 13 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

**Table 13      Waste Generated**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	11.33	37.09%decrease	100%
Non-Hazardous	1872.84	35% decrease	99.18%%
Inert			
<b>Total Tonnes</b>	1884.17	35.23% decrease	99.18%

#### Comment

The main wastes generated from this activity are Waste Oil, Oil Filters, Oily Rags, Batteries, Interceptor Waste, Parts Wash, Polythene, Scrap Metal, Silt Pond Waste and Peat Screenings all of which are recycled. The waste generated for landfill was from Waste skips.

## Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes ☐

No ☒

### Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 14 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

**Table 14     Waste Accepted**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous			
Non- Hazardous			
Inert			
<b>Total Tonnes</b>			

Comment

N/A

## 8) Financial Provision

---

### Explanation

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high risk facility<sup>10</sup> by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes ☐

No ☒

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

Not required under the licence. However, the equivalent Bog Rehabilitation Plans, which include closure, restoration and aftercare are being submitted to the Agency in advance of any decommissioning and rehabilitation.

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

Not required under the licence.

4. Has there been any significant changes on your site since the last agreements?

Yes ☐

No ☒

---

<sup>10</sup> See Appendix II

If yes, have you submitted details to the EPA?

Yes ☐

No ☐

N/A ☒

# Appendix I

## Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

Class 1	Minerals and other materials
Class 2	Energy
Class 3	Metals
Class 4	Mineral fibres and glass
Class 5	Chemicals
Class 6	Intensive Agriculture <sup>11</sup>
Class 7	Food and drink
Class 8	Wood, paper, textiles and leather
Class 9	Fossil fuels
Class 10	Cement, lime and magnesium oxide
Class 11	Waste
Class 12	Surface Coatings
Class 13	Other Activities

---

<sup>11</sup> This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at <http://www.epa.ie/pubs/advice/aerprtr/aerguid/>

# Appendix II

## High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

### NOTE:

This list is subject to change.

See the link below for further information.

<http://www.epa.ie/pubs/advice/licensee/fp/epaapproachtoenvironmentalliabilitiesandfinancialprovision.html>



# Annual Environmental Report (AER) 2023

Company Name: Bord na Mona Energy Ltd (Mountdillon Group)

Licence Number: P0504-01

Address: Bord na Mona, Mountdillon Works, Lanesboro, Co Longford

Class of Activity<sup>1</sup>: 1.4

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<sup>1</sup> See Appendix I

# Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities<sup>2</sup> of large scale industrial (e.g. chemical, food processors, power plants) and waste facilities. Submitting an Annual Environmental Report (AER) is a requirement of all EPA licences.

An AER is a public document. To this end, this format has been developed for industrial and waste licence holders (other than the intensive agriculture sector) to use as a template. This is to assist any member of the public to interpret and understand the environmental performance of the licensed facility.

The AER is a **summary** of environmental information for a given year. It includes:

- Details of the licence holder's environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility's activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

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<sup>2</sup> See Appendix I



- 2) Some documents<sup>3</sup> are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

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<sup>3</sup> This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

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## Glossary

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Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
Beyond Compliance	Beyond compliance is concept to help deliver greater organisational performance and long-term value for the environment, society and the economy.
CRAMP	Closure, Restoration and Aftercare Management Plan.
ELRA	Environmental Liability Risk Assessment.
Emission Limit Value	Limits set for specified emissions, typically outlined in Schedule B of an EPA licence.
EMS	Environmental Management System.
Environmental Goal	An objective or target set by a licensee as part of an environmental management system (EMS).
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Incident	As defined by an EPA industrial or waste licence.
Inert Waste	Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health.
List of Wastes (LoW)	A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU.
Noise Sensitive Location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Non-Renewable Resource	A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas.
Oil Separator	Separator system for light liquids (e.g. oil and petrol).
PRTR	Pollutant Release and Transfer Register.
Renewable Resource	Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.
Sanitary Waste	Waste water from toilet, washroom and canteen facilities.

Storm Water	Rain water run-off from roof and non-process areas.
Surface Water	Lakes, rivers, streams, estuaries and coastal waters.
Trigger Level	A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder.
Volatile Organic Compounds	Gases produced from solids or liquids that evaporate readily in ambient conditions.
Waste	Any substance or object which the holder discards or intends or is required to discard.

#### Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

## Declaration

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I, *Cathal Brennan* PCAS Operations Manager confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

**Tick here**



## 1) Introduction

---

See below a brief description of our facility and a summary of our environmental performance this year.

- During the reporting period the primary activities were peat sales of existing stock and decommissioning and rehabilitation of several bogs in this IPC Licence.
- During the reporting period, 632 Ha's of peatlands at Clooneeny, Begnagh, Derraghan, Glenlough, Knappogue, and Derrycashel Bogs were rehabilitated.
- During the reporting period 351 Ha's of peatlands were decommissioned, with plant, equipment and waste materials removed from these bogs.
- In the period, there was no complaints of an environmental nature, down from the two complaints received in 2022.
- During the period, there was a 9.55% decrease in waste generated, mostly related to a decrease in activity, but an increase in decommissioning.
- In the period, there was 4 reported incidents of an environmental nature relating to exceedances in the COD trigger level. These were of minor significance and were closed out during the period.
- During the period, there were various submissions to the Agency including the 2022 AER, mapping clarifications, review of silt pond maintenance, the annual monitoring returns, and various updates on relevant activities.
- During 2023, Rehabilitation plans, maps and associated assessments were submitted to the Agency for Derryshannogue, Derryad East, Derryarogue, Corlea, Clynan and Mostrim Bogs and these are available to view at <https://www.bnmpcas.ie>
- Bord na Mona continued to retain certification to ISO9001 for the decommissioning and rehabilitation of peatlands to support the climate action scheme (PCAS).

## Contact Us

If you have any questions or would like further information on any aspect of our licensed activity, please contact us directly.

See below details:

Enda McDonagh,  
Bord na Mona Energy Ltd  
Leabeg  
Tullamore  
Co Offaly  
[www.bnm.ie](http://www.bnm.ie)



## 2) How we Manage our Facility

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### Environmental Management System

#### Explanation

To ensure our facility's activities do not cause environmental pollution we are required to have detailed documentation systems in place to help us manage and track our environmental performance. These systems are referred to as Environmental Management Systems (EMS). We review our EMS every year and set up-to-date **environmental goals** to continually improve our environmental performance.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

**Table 1      Environmental Goals**

Environmental Goal	Target Date	Progress
Training/awareness for all area leaders and operatives in advance of decommissioning and rehabilitation of the 2024 bogs.	May 2024	Underway
Waste Management – Removal of all waste that are deemed a risk the environment in bogs scheduled to be decommissioned in 2024	Dec 2024	Underway
Communication of Decommissioning and Rehabilitation plans to all neighbours within 1km of the proposed activity for 2024	June 2024	Applicable bogs will have letters and associated details delivered.
Completion of internal audits/inspections of applicable bogs scheduled for decommissioning and rehabilitation as	Sept 2024	Not commenced Yet

required by condition 10 and the Peatlands Climate Action Scheme		
Maintain surface water quality compliance with emission limit values for Suspended Solids during the proposed decommissioning and rehabilitation programme.	Dec 2024	Underway
Decommissioning and Rehabilitation of bogs in accordance with Condition 10 of the IPC Licence and in accordance with Peatlands Climate Action Scheme <a href="https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/">https://www.gov.ie/en/publication/136a7-bord-na-mona-bog-rehabilitation-scheme/</a>	Dec 2024	To commence on the 1 <sup>st</sup> April 2024

Add rows as necessary

#### Comment

As peat extraction on all bogs in this licence ceased in 2020, all environmental goals for 2024 are linked to the remaining bog activity which is the decommissioning and rehabilitation of the applicable bogs planned for 2024.

## Beyond Compliance

### Explanation

We are legally required to comply with our environmental licence. However, the EPA realise that some sites go further than just complying with their environmental licence requirements. Some projects carried out at facilities can have long term positive impacts on the environment and local communities.

The EPA's beyond compliance initiative is encouraging us to identify and report on these environmental and sustainability projects. For example, the project could involve renewable energy, biodiversity, water conservation or exemplar community engagement.

**Did any project completed on your site in the reporting year go beyond your licence requirements?**

Yes ☒

No ☐

If yes, provide details of one case study in Appendix III that demonstrates how the project went beyond compliance of your licence.

### 3) Energy & Water

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#### Energy

##### Explanation

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

**Table 3      Energy Used**

Energy Used	Quantity (GJ)	% Increase/ decrease on previous year
Electricity	2580.21	-5.08% decrease
Heavy Fuel Oil		
Light Fuel Oil	10652.9	-3.77% decrease
Natural Gas		
<b>Coal / Solid Fuel</b>		
Peat		
Renewable Biomass		
Renewable Energy Generated On-site		
<i>Total Energy Used</i>	13,233.11	

##### Comment

Both Electricity and Fuel usage decreased in 2023, linked to the main activities with were decommissioning of facilities and pumps, and the rehabilitation of peatlands.

The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

**Table 4      Energy Generated**

<b>Energy Generated</b>	<b>Quantity (GJ)</b>	<b>% Increase/ decrease on previous year</b>
Renewable Energy	NA	
<b>Total Energy Generated</b>		

Comment

There are no renewable assets on this site.

## Water

### Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

**Table 5      Water Used**

<b>Source of Water Used</b>	<b>Quantity (m<sup>3</sup>/year)</b>	<b>% Increase/decrease on previous year</b>
Groundwater		
Surface Water	0	
Public Supply		
Recycled Water	0	
Rainwater	0	
<b>Total Water Used</b>		

### Comment

The only water used is that required to provide associated offices and workshop welfare facilities (canteen/toilets)

## 4) Environmental Complaints

### Explanation

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us<sup>4</sup> directly. You can also contact the EPA<sup>5</sup> if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

**Table 6 Summary of All Environmental Complaints Received in**

Type of Complaint	Number of Complaints	Number Closed
Odour / Smells		
Noise		
Dust		
Water Quality		
Air Quality		
Waste		
Litter		
Vermin/Flies/Birds		
Soil Contamination		
Vibration		
Other		

<sup>4</sup> See Section 1, Introduction – Contact Us

<sup>5</sup> If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

## Comment

As required environmental complaints are reportable to the EPA and as such must be investigated. In the 2023 reporting period, this licence had no complaints.



## 5) Environmental Incidents

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### **Explanation**

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.

**Table 7      Number of Environmental Incidents**

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Abatement Equipment Offline					
Breach of Ambient ELV					
Breach of Emission Limit					
Explosion					
Fire					
Monitoring Equipment Failure					
Odour					
Spillage					
Breach of trigger Level	4				
Uncontrolled Release					

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Other					

#### Comment

As required, incidents of an environmental nature are reportable to the EPA and as such must be investigated. In the 2023 reporting period, this licence recorded and reported 4 incidents. These incidents were related to trigger level breaches for COD and are closed in the EPA's Eden reporting system.

## 6) Our Environmental Emissions

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### **Explanation**

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Waste water
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA<sup>6</sup>.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

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<sup>6</sup> See section 5, Incidents

## Storm Water

### **Explanation**

Storm water is rain water run-off from roof and non-process areas of a facility, e.g. car parks, and generally shall not contain any pollution. Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

### **1. Storm water from our facility is managed prior to release by;**

Either direct to drain where it is roof water only, or via petrol/oil interceptor.

### **2. Storm water from our facility is released into the following water bodies:**

Lehery River, Cloontuskert River, Inny River

**Table 8      Summary of Storm Water Monitoring**

Parameter measured	No. of Samples	% Compliant <sup>7</sup>	Comment
COD	17	100%	

Add rows as necessary

#### Comment

As required by the licence, stormwater is required to be separated where possible from process/non-process areas. Where this is not possible, stormwater is managed via oil-interceptors which are inspected monthly and sampled for associated discharges each month. Other than visual observations, the other main criteria to define adequate treatment is COD mg/l, so this and visual inspections dictate when the interceptor is cleaned by an approved hazardous waste contractor.

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<sup>7</sup> % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.

## Waste Water

### Explanation

There are two types of waste water that can be produced:

- Process waste water produced from the activities and;
- Sanitary waste water from toilets, washrooms and canteens.

Our EPA licence requires us to manage our waste water on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the waste water produced from our activities, where it is released and the results of monitoring this year.

### **1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody;**

All production area runoff is treated via an associated silt pond designed, inspected and maintained in accordance with condition 6 of the IPC Licence

### **2. Treated waste water from our facility is released into the following water bodies:**

Feorish River, Drinagh River, Cloontuskert Outfall, Moher Outfall, Cloonaddra Outfall, Cloonkeel Outfall, Ballinakill River, Grillagh River, Leherly River, Clondra River, Fallon River, Ballyminion River, Derryoghill River, Derrymacar River, Billberry River, Inny River, Camlin River.

**Table 9      Summary of Waste Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant</b>	<b>Comment</b>
Suspended Solids	140	100%	
Ammonia	77	100%	
Total Solids	140	NA	
Total Phosphorus	77	NA	
pH	77	NA	
Colour	77	NA	
COD	94	95.75%	

Add rows as necessary

#### Comment

Licence requirements are quarterly grab samples on a selected number of silt pond outlets as per condition 6.2 and one 24hr flow proportional composite sampler at Clooneeny.

The emission limit values are 35mg/l suspended solids, 1.42mg/l total ammonia and 100mg/l COD. There were no exceedances for suspended solids in 2023, four trigger level exceedances for COD and there were no exceedances for Ammonia.



## Air

### Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

### 1. We monitor air emissions from the following number of emission points at our facility.

As peat production has ceased. No dust monitoring took place during 2023

**Table 10 Summary of Air Emissions Monitoring**

Parameter measured	No. of Samples	% Compliant	Comment
N/A			

Add rows as necessary

### Comment

Due to the cessation of peat production, it is no longer necessary to monitor for air emissions.

**Table 11 Summary of Odour Assessments Carried Out**

<b>Assessment Conducted By</b>	<b>No. of Odour Assessments</b>	<b>% Compliant<sup>8</sup></b>	<b>Comment</b>
Licence Holder	N/A		
EPA	N/A		

Add rows where necessary

Comment

There are no odour emissions of note from the activity, no requirements to monitor and no associated complaints.

---

<sup>8</sup> A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at [Air Enforcement | Environmental Protection Agency \(epa.ie\)](#)

## Fugitive Solvent Emissions

Are you required to monitor fugitive solvent air emissions from your facility?

Yes ☐

No ☒

### Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations<sup>9</sup>. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

**Table 12 Summary of Fugitive Solvent Emissions**

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant

Comment

N/A

<sup>9</sup> See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

## Groundwater

### Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

**1. Do you have a groundwater monitoring programme in place?**

Yes ☐

No ☒

**2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?**

Yes ☐

No ☒

**Table 13 List of Groundwater Pollutants Identified**

Pollutants

Add rows as necessary

**3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.**

N/A

**Comment**

There are no licence requirements to monitor groundwater from the activity.

## Noise

### Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

#### 1. We conducted noise monitoring on the following dates this year:

N/A

#### 2. Where was the noise monitoring carried out?

- i. the boundary of our facility;
- ii. noise sensitive locations off-site; or
- iii. both.

N/A

#### 3. Were measured noise levels compliant with your EPA licence limits?

Yes ☐

No ☐

If No, we took the following actions to address the noise level exceedances?

N/A

#### Comment

There are no licence requirements to monitor noise from the activity, or any complaints regarding noise impact.

## 7) Waste

---

### Waste Generated

#### Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in Table 14 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

**Table 14 Waste Generated**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	46.18	307 % increase	100%
Non-Hazardous	1658	11.44 % decrease	98.98%
Inert			
<b>Total Tonnes</b>	1704.18	9.55 % decrease	98.99%

#### Comment

The main wastes generated from this activity are Waste Oil, Oil Filters, Oily Rags, Batteries, Interceptor Waste, Parts Wash, Polythene, Scrap Metal, Silt Pond Waste and Peat Screenings all of which are recycled. The waste generated for landfill was from Waste skips.

## Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes ☐

No ☒

### Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 15 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

**Table 15     Waste Accepted**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous			
Non-Hazardous			
Inert			
<b>Total Tonnes</b>			

Comment

Waste is not accepted at this licensed activity.



## 8) Financial Provision

---

### Explanation

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high risk facility<sup>10</sup> by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes ☐

No ☒

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

Not required under the licence. However, the equivalent Bog Rehabilitation Plans, which include closure, restoration and aftercare are being submitted to the Agency in advance of any decommissioning and rehabilitation.

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

Not required under this Licence.

4. Has there been any significant changes on your site since the last agreements?

Yes ☐

No ☒

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<sup>10</sup> See Appendix II

If yes, have you submitted details to the EPA?

Yes ☐

No ☐

N/A ☒

# Appendix I

## Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

Class 1	Minerals and other materials
Class 2	Energy
Class 3	Metals
Class 4	Mineral fibres and glass
Class 5	Chemicals
Class 6	Intensive Agriculture <sup>11</sup>
Class 7	Food and drink
Class 8	Wood, paper, textiles and leather
Class 9	Fossil fuels
Class 10	Cement, lime and magnesium oxide
Class 11	Waste
Class 12	Surface Coatings
Class 13	Other Activities

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<sup>11</sup> This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at [Compliance & Enforcement: Licensees: Reporting Publications | Environmental Protection Agency \(epa.ie\)](#)

# Appendix II

## High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

### NOTE:

This list is subject to change.

See the link below for further information.

[Compliance & Enforcement: Financial Provisions Publications | Environmental Protection Agency \(epa.ie\)](#)

# Appendix III

## Beyond Compliance

The case study below shows how we went beyond the requirements of our licence in the reporting year.

The Government implemented a scheme called the 'Peatlands Climate Action Scheme' (PCAS), also known as the Peatlands Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS). The Scheme commenced in 2021 and was devised so that Bord na Móna could carry out enhanced rehabilitation of its industrial peatlands, having ceased peat extraction in 2020. The scheme is supported by Government through the Climate Action Fund, and Ireland's National Recovery and Resilience Plan administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) act as the Scheme regulator and the Environmental Protection Agency regulate rehabilitation plan under Condition 10 of this IPC Licence. This Scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations under the existing EPA IPC licence conditions. Improvements supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met), and importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered.

To measure and verify the rehabilitation outcomes, the scheme has increased the water monitoring requirements of the licence, the range of parameters to be included and the frequency of monitoring.

These co-benefits include supporting the objectives of the Irelands Climate Action Plan, the preservation of wetland archaeology, the reduction of peak flows to receiving water, supporting Irelands Biodiversity objectives, reduction in carbon emissions, improvements in water quality and reduction in water abstraction pressures associated with drainage. For further details see [www.bnmpcas.ie](http://www.bnmpcas.ie)