

Response to EPA Audit Reference SV31656 conducted on 17.09.2025

Please find below response to site specific issues highlighted during site audit conducted on 17.09.2025 and information submission in Licensee Return LR097967.

Item 2.1 Unapproved alterations to TMF

Under Condition 8.13.7, design and construction details for all basal and side-wall containment engineering works at any part of the TMF shall be agreed with the Agency in writing prior to construction. However, the licensee commenced the works for the construction of the buttress without the written agreement of the Agency.

Action Required:

The licensee shall submit Construction Quality Assurance plan for the buttress construction project.

Response:

The Construction Quality Assurance (CQA) Plan for the buttress reinforcement project was submitted to EDEN on November 10th, 2025, with reference LR098942.

Item 2.2 Missed Monitoring

The Agency noted that the licensee did not conduct weekly pH and cyanide monitoring of waste tailings (including carrying water) for the following weeks over the course of 2025: 3, 4, 6, 10, 14, 16, 18, 19, 21, 23, 26, 27, 30, 34 and 36.

Action Required:

The licensee is reminded to conduct environmental monitoring for all parameters as required with Condition 6.2 and Schedule C.4.

Response:

The weekly pH and cyanide monitoring of waste tailings (including carrying water) was not conducted during the periods referenced above because the processing plant was not operational during those weeks. Consequently, no tailings were generated, and sampling could not be undertaken.

As outlined during the site audit, the processing plant is scheduled to remain non-operational for at least one week each month. During these periods, no tailings or carrying water are produced. BTM will ensure full compliance with Condition 6.2 and Schedule C.4 during all weeks when the mill is operational, and tailings are generated.

Item 2.3 Long-term pipeline project

The licensee informed the Agency they had a meeting with Meath County Council in July 2025 in relation to the replacement of the section of tailings and reclaim pipeline crossing under the River Blackwater.

Action Required:

The licensee shall follow-up with Meath County Council regarding the long-term pipeline replacement project. The licensee shall then provide an update to the Agency proposal for the long-term pipeline project and an estimated timeframe for its completion with the Agency under CI Action A126518 as set out under Compliance Investigation CI002064.

Response:

The long-term tailings and reclaim water pipeline replacement project plan, addressing the remaining sections of pipelines has been updated in CI002064 Action A122543.

BTM are maintaining regular engagement with Meath County Council, who are liaising with *Iarnrod Éireann* regarding the potential use of existing bridge to facilitate crossing the River Blackwater.

Short-Term Actions (1–3 Months)

- Ensure adequate soil cover over pipelines within the site facility.
- Conduct integrity testing on the failed tailings pipeline section.
- Initiate engineering design and scope for the replacement of approximately 550m of tailings and reclaim water pipelines within the mine site facility.
- Continue to engage with Meath County Council regarding utilising the existing *Iarnrod Éireann* bridge to cross the River Blackwater
- Reinforce emergency response training for operational personnel.

Medium-Term Actions (by end of 2026)

- Replace remaining section of tailings and reclaim water pipelines (550m each in length) within the mine site facility (extending from the pipeline trestle across the railway track to south of Kells Road).
- Commission pipeline sections following successful hydrostatic and integrity testing.
- Review existing conceptual bridge design, perform detailed structural and geotechnical assessment and develop detailed design.
- Submit a planning application for a dedicated bridge crossing the River Blackwater to accommodate pipeline routing.

Long-Term Actions (from 2027)

- Subject to planning approval, construct the River Blackwater crossing bridge in compliance with engineering and environmental standards.
- Install new pipelines across the bridge to convey tailings and reclaim water in compliance with design and regulatory standards.

BTM will continue to keep the Agency informed and provide updates as this project advances.

Item 2.4 Landfill Restoration and Closure Plan

The Agency notes that the Landfill Restoration and Closure Plan submitted to the Agency on 16/02/2021 under Licensee Return LR055487 was not approved by the Agency.

Action Required:

The licensee shall submit a revised Landfill Restoration Plan and submit it to the Agency.

Response:

The additional information requested by the Agency will be incorporated into a revised Landfill Restoration Plan. A suitably qualified consultant, previously involved in the landfill remediation strategy, has been engaged to review the existing plan and integrate the required updates. The revised plan will comprehensively address groundwater and surface water management measures, monitoring protocols and other specifications outlined by the Agency. Once finalised, the updated Landfill Restoration Plan will be submitted to the Agency for review in Q1 2026.

Item 2.5 Documentation

Due to a failure of their Laboratory Instrument Monitoring System (LIMS), the licensee did not have the following documentation available at the time of the site visit.

Action Required:

The licensee shall ensure that all documentation relevant to conditions of licence is available for inspection by the Agency at all reasonable times, in accordance with Condition 11.9.

Response:

At the time of the EPA site audit, the Laboratory Information Management System (LIMS) was undergoing a major upgrade to a newer version. As a result, the system was temporarily

unavailable for running and displaying reports and results. The upgrade has since been completed, and the system is now fully operational

Item 2.6 Dust Monitoring

The Agency noted five instances of elevated dust deposition as part of the monthly dust deposition monitoring records for 2025, submitted to the Agency under Licensee Return Ref. No. LR09796.

Action Required:

The licensee shall review all dust control measures onsite to ensure that activities at the installation do not give rise to exceedances in the dust deposition levels specified in Schedule B.1.2 in accordance with Condition 5.2.

Response:

It should be noted that two of the five dust deposition monitoring locations are situated outside the IE License boundary on privately owned lands. These areas are predominantly surrounded by agricultural activity and vegetation and therefore not under the direct control of BTM.

For each instance of elevated dust deposition recorded, the corresponding metal fractions (zinc, lead, arsenic, and cadmium) were not elevated, indicating that the exceedances were not associated with hazardous substances.

Of the three monitoring locations within the IE License boundary, the elevated (non-hazardous) particulate levels are likely attributable to ongoing buttress construction works. Furthermore, each exceedance was an isolated occurrence and does not result in a breach of the annual mean limit values specified in Schedule B.1.2 of the IE Licence. Annual mean values are calculated over a calendar year, and all results remain within compliance when assessed on this basis.

The following dust control measures are in place:

- A CCTV system in operation with continuous 24-hour manned surveillance from the Mill Central Control Room.
- Availability of a trained mine rescue team on a 24-hour call out basis.
- Vegetation established on surface areas of Stage 5 more susceptible to dust blow.
- Tailings deposited into Stage 6 are co-mingled (coarse and fine fraction) reducing exposure of coarser particles that have a higher potential for dust blow.
- A mobile irrigator located in Stage 5, available for deployment to any area identifies as having potential dust blow risk.

Item 2.7 Site Shutdown

The licensee informed the Agency that a two-week shutdown of the site was planned between October and November.

Action Required:

The licensee shall notify the Agency of the commencement and the end of the site shutdown period.

Response:

The referenced two-week period was a scheduled maintenance shutdown undertaken as part of the site's preventative maintenance programme. This planned annual activity is designed to ensure the continued safe and efficient operation of critical equipment and infrastructure. Key works included installation of liners in the AG Mill, commissioning of new courier analyser, transformer upgrade works at the TSF, and comprehensive preventative maintenances checks.

This did not represent a full cessation of site operations, as essential functions remained active throughout the maintenance period.

Item 2.8 Storm water Visual Inspection

The licensee's daily logs for storm water visual inspections did not record comments regarding the appearance of storm water.

Action Required:

The licensee shall update the daily storm water visual inspections records to include a comment on the appearance and odour of the storm water and the weather conditions at the time of the inspection.

Response:

The daily operator inspection report has been updated to more accurately reflect these requirements.

Item 2.9 Emissions to Water Monitoring

The Agency noted that the Limit of Detection (LOD) for monthly emission to water monitoring at SW2 for ortho-phosphate was greater than the Emission Limit Value (ELV) at <0.41mg/l against 0.14mg/l on 04/02/2025, 06/05/2025 and 01/07/2025.

Action Required:

The licensee shall ensure that all measurements and analysis are conducted in a way that can be properly assessed against the ELVs for all parameters.

Response:

For sampling events referenced the laboratory method used had an LOD of <0.41 mg/l, which exceeded the ELV of 0.14 mg/l. as a result the reported values could not be accurately assessed against the ELV. To address this, BTM has engaged with the external laboratory service provider (ALS) to ensure that future analysis use analytical methodologies that achieve an LOD below the ELV for ortho-phosphate. This will ensure that future monitoring results are fully compliant with Schedule B.2 of the IE Licence and can be properly evaluated against the specified ELVs.