



MAIN FILE ✓

HEALTH AND SAFETY AUTHORITY

PUBLIC FILE ✓ X 2

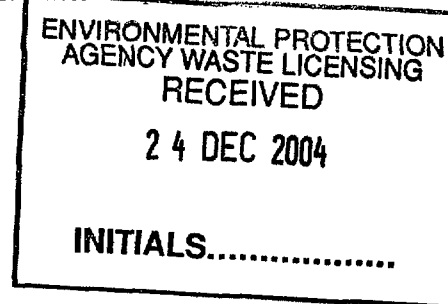
EVALUATION FILE *Alford*DATE *6/1/05 (CR)*

3rd Floor, 1A South Mall, Cork, Ireland

Telephone: 021-4251212 Fax: 021-4251217

Website: <http://www.hsa.ie/osh>

Ms. Brid White
Office of Licensing and Guidance,
Environmental Protection Agency,
PO Box 3000
Johnstown Castle Estate,
Co. Wexford

December 21st 2004

Dear Ms. White,

I refer to your letter issued to Mr. Michael Henry of the Health and Safety Authority on December 9th last, informing the Authority that an application for an Integrated Pollution Prevention and Control Licence had been received by the Agency from Shell E&P Ireland Limited, in relation to the Bellanaboy Bridge Gas Terminal at national grid reference 086425E 333125N.

You may be aware that under the European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations, 2000, which will apply to this establishment, the Health and Safety Authority has a duty to provide technical advice to the planning authority regarding the risks arising from that establishment. This advice was provided by the Health and Safety Authority to Mayo County Council in early 2004.

As part of that advice, the Health and Safety Authority made a number of recommendations, in relation to providing additional protection to the environment in the context of a major accident as defined. These recommendations are reproduced below –

- a) Paved areas to be extended to bund walls and arranged so that any accidental releases over bund wall are diverted to the open drains sump
- b) Extension of impermeable areas around the slugcatcher such that any potential release is contained.
- c) Online Total Organic Carbon monitoring to be installed at silt ponds with provision for automatic re-routing of flow to contaminated firewater pond in event of accidental discharge to system.

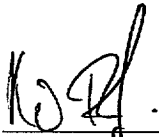
In their grant of planning permission, Mayo County Council included the above three recommendations as planning conditions, but these were subsequently the subject of a first party appeal to An Bord Pleanála. In its grant of planning permission, An Bord Pleanála, in reference to the above conditions stated that –

“Conditions 34-36 (incl.)

These relate to health & safety requirements during the operational phase of the development. All of the conditions contain requirements to prevent pollution from releases of material. The reason given for each of the conditions is *to ensure proper environmental control in the event of accidental spillage of hazardous material*. The Planning Authority states that the HSA technical advice recommended inclusion of these items. I submit that the subject matter of these conditions would be more appropriately addressed through the IPPC licensing code, and that the conditions should not be included in any permission granted by the Board.”

The Authority wishes to draw the Agency's attention to this matter when considering an Integrated Pollution Prevention and Control licence for this establishment.

Yours sincerely,



Kevin Buckley
Inspector
Health and Safety Authority

For inspection purposes only.
Consent of copyright owner required for any other use.