

**Sonja Smith**

---

**From:** Joe Reilly  
**Sent:** 05 July 2010 09:34  
**To:** Maire Buckley; Sonja Smith  
**Subject:** FW: Review of Licence P0606-03 Endesa Ireland Limited [Great Island]  
**Attachments:** Endessa 2.7.10.doc

**From:** Wexford Receptionist  
**Sent:** 05 July 2010 09:28  
**To:** Joe Reilly  
**Subject:** FW: Review of Licence P0606-03 Endesa Ireland Limited [Great Island]

Rec'd today at [info@epa.ie](mailto:info@epa.ie)

Ann Rochford  
Programme Officer,  
Environmental Protection Agency  
P O Box 3000  
Johnstown Castle Estate  
Wexford  
Tel: 00353 53 91 60600  
Fax: 00353 53 91 60699  
Email: [info@epa.ie](mailto:info@epa.ie)  
Web: [www.epa.ie](http://www.epa.ie)

**From:** Redmond, John [REDACTED]  
**Sent:** 02 July 2010 17:06  
**To:** Wexford Receptionist  
**Cc:** Deacon, Anne; Grogan, Matt; Cullen, Bernadette  
**Subject:** Review of Licence P0606-03 Endesa Ireland Limited [Great Island]

To: Office of Climate, Licensing and Resource Use

Please see attached submission on the above application.

Hard copy to follow.

Regards,

John Redmond

Senior Environmental Health Officer

Health Service Executive

Whitemill Industrial Estate

Wexford

[REDACTED]

[REDACTED]

[REDACTED]

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

---

This email has been scanned by the MessageLabs Email Security System.  
For more information please visit <http://www.messagelabs.com/email>

---

=====  
IMPORTANT  
=====

Information in this email (including attachments) may be confidential. It is intended for receipt and consideration only by the intended recipient. If you are not the intended recipient, any use, dissemination, disclosure, publication or copying of information contained in this email (including attachments) is strictly prohibited. Opinions expressed in this email may be personal to the author and are not necessarily the opinions of the Health Service Executive. If this email has been received by you in error, please notify the sender and then delete the email from your system.

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

• • • • •  
• • • • •  
• • • • •



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

HSE South  
Wexford Local Health Office  
Environmental Health Service  
Whitemill Industrial Estate  
Wexford

Telephone: 353 53 9123522  
Fax: 353 53 9142068

**Environmental Protection Agency  
Office of Climate, Licensing and Resource Use,  
Johnstown Castle Estate,  
Co. Wexford**

2<sup>nd</sup> July 2010

**RE: Proposed Review of IPPC Licence Register P0606-03  
Endesa Ireland Limited (Great Island)**

Dear Sirs,

Further to yours of the 18<sup>th</sup> May 2010 addressed to the Assistant National Director, Environmental Health, I wish to make the following comments.

These comments are arranged by reference to the conditions attached to the current licence P0606-02.

It is our understanding that licensing controls apply only to the actual operation of the plant (existing and proposed) and not to the actual construction phase of the new plant or demolition phase of the existing plant, which activities are controlled under the planning process. In view of this our submission is confined to plant operation.

#### **Condition 5: Emissions to Atmosphere**

It is presumed that this condition will be modified by the imposition of the limit values of Directive 2008/50/EC and that stricter emission limit values will be imposed on commissioning of the new combined cycle gas turbine generating station.

It is noted that the Environmental Protection Agency response to An Bord Pleanála stated that the Agency would not grant a licence unless, inter alia,

the best available techniques were used to prevent or eliminate or, if this is not practicable, generally to reduce an emission from the activity.

Appropriate conditions should also be applied for the commissioning phase of the new plant to ensure that any problems encountered during this period do not give rise to nuisance.

Comprehensive air quality monitoring should be carried out at locations on both sides of the estuary to alleviate the concerns expressed by residents in the vicinity.

It is noted that Cheekpoint Community Alliance have requested continuous monitoring in Cheekpoint village.

### **Condition 6: Emissions to Water**

We would expect that this condition would be revised to reflect the new situation on commencement of the new CCGT Plant to take account of the reduction in volume of discharge and changes to quality of same.

In regard to emissions to the estuary it is suggested that consideration be given to sediment sampling as this may give a better indication of the level of pollutants present as these would tend to accumulate in sediment. This would be a matter of concern to the Health Service Executive as there are extensive shell fish layings in the estuary.

### **Condition 7: Waste Management**

Concern has been expressed regarding the Environmental Impact of the former waste disposal area on site. The applicant states that work on this area was undertaken in consultation and with the approval of the Environmental Protection Agency. We would recommend that the Environmental Protection Agency re-examine this area to ensure that the remediation work carried out meets current standards.

### **Condition 8: Noise**

Condition 8 of the licence specifies that on site activities shall not give rise to noise levels off site at noise sensitive locations which exceed 55 dB[A] (daytime) and 45 dB[A] (nighttime).

The Annual Environmental Report for 2009 includes a noise measurement report carried out by Euro Environmental Services. This report includes measurements taken at four locations as follows: main gate, jetty gate, cw outfall and "Matter and Platt".

The measurements were taken on the 26<sup>th</sup> November 2009 and most measurements exceeded 70 dB[A]

It is not clear from the report that the measurements were taken at "Noise Sensitive Locations". If the locations are considered as such the report clearly indicates non-compliance with Condition 8. Alternatively if the locations measured are not "Noise Sensitive" the report is not relevant. It would also appear that sources other than the target source were not excluded in the survey.

Appropriate monitoring should be carried out to establish compliance with Condition 8.

### **Condition 9: Non-Process Water**

Section 9.2 deals with ground and groundwater. Monitoring of groundwater during 2008 and 2009 indicates exceedences in aluminium and arsenic. The 2009 Annual Environmental Report states *"the critical human health pollutant linkage for groundwater contaminants at this site is the inhalation of groundwater vapours. It is noted that groundwater is not a potable supply given its brackish nature and therefore the impact to human receptors by drinking is not considered a viable pollutant linkage and no risk to human health"*. We consider that, regardless of the brackish nature, contamination of ground water is not desirable. We would be concerned to ensure that the full extent and source of this groundwater contamination be determined and that, if appropriate, remediation measures are taken.

### **Condition 11: Monitoring**

We would suggest that where concerns are raised regarding specific pollutants/ contaminants that consideration be given to the inclusion of appropriate monitoring for such pollutants or contaminants in the licence.

Concern has been raised regarding heavy metal pollution in the estuary. Sediment monitoring should be considered as a means of determining such pollutants.

I trust that the above comments will be taken into consideration in determining the application for review of the above licence.

Yours faithfully,

---

John Redmond  
Senior Environmental Health Officer

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