



Submission

Submitter:	Miss Kay O Connor
Organisation Name:	HSE
Submission Title:	HSE submission report Great Island Power Statio EHIS 1381 EPA P0606-04
Submission Reference No.:	S006179
Submission Received:	05 November 2020

Application

Applicant:	SSE Generation Ireland Limited
Reg. No.:	P0606-04

See below for Submission details.

Attachments are displayed on the following page(s).

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HSE South Emergency Management Consultation Report			
Report to	Siobhan Byrne, PEHO, Wexford	Date	1st Oct., 2020
Type of consultation: EIS <input type="checkbox"/> Scoping <input type="checkbox"/> Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/>			
Other (please specify): Industrial Emissions (IE)			
Authority	Environmental Protection Agency		
Authority Reference Number	Po606-04	EHIS 1381	
EM Reference Number	EMENV058		
Applicant	SSE Generation Ireland Ltd., Great Island Generation Station, Campile, New Ross, Wexford		
Proposal	Combustion of fuels in installations with a total rated thermal input of 50 MW or more		

HSE South Emergency Management Observations:

Please be advised that the HSE South Emergency Management function does not have any specific observations to make with respect to this application. However, please note the following recommendations within the context of site operations:

1. Should an incident occur at the site and the site operator requires the assistance of the emergency services, the incident information should be provided in the `ETHANE` format (please see attached).
2. Emergency Services access to the site should be clearly identified. This should be undertaken via appropriate high visibility signage, i.e. a green sign with a yellow border and white lettering citing the abbreviation RVP.
3. The site should have a mechanism in place to account for personnel during an evacuation in order to provide the responding emergency services with an estimate of the number of people accounted and unaccounted for.
4. The site should identify any critical / vulnerable facilities within the geographical catchment area, such as hospitals, schools, nursing homes, etc, that could be directly or indirectly affected by an incident at the site.
5. Where the `off-site` impacts of an incident at the site affects a vulnerable cohort / population such as children within crèches, schools; patients / clients / residents within nursing homes, etc; the emergency services will require assistance from the site operator in determining the impact on the local community.
6. The site operator is encouraged to develop a business continuity plan that includes a plan for severe weather. For more advice on this, please see the Department of Business, Enterprise and Innovation, *Business Continuity Planning in Severe Weather*.
<https://dbei.gov.ie/en/Publications/Publication-files/Business-Continuity-Planning-in-Severe-Weather-Check-List-for-Businesses.pdf>

All correspondence or any queries with regard to this report should be forwarded to Ms. Maryanne Horgan, Emergency Management Office, HSE South, Eye, Ear and Throat Hospital, Western Road, Cork, T12 WP62 or maryanne.horgan@hse.ie



Environmental Health Service,
Whitemill Industrial Estate,
Wexford
Phone: 053-9114376
E-Mail: anne.deacon@hse.ie

Date: 20th October 2020

Our reference: 1381

Report to: Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford

EPA reference: P0606-04

Type of Consultation: Industrial Emissions

Applicant: SSE Generation Ireland Limited, Great Island Generation
Station, Campile New Ross, Y34 KC62, New Ross,
Wexford

Nature of Activity:

Classes and Nature of Activity in accordance with the EPA Act 1992 as amended			
Class of Activity	Main Activity	EPA Act Sector (where applicable)	Class of Activity Description
2.1	Yes	Energy	Combustion of fuels in installations with a total rated thermal input of 50 MW or more.

Introduction

The following HSE departments were notified of the consultation request for the licence application on 30th September 2020

- Emergency Planning – David O’Sullivan
- Estates – Helen Maher

- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Kate Killeen White

1. General Introduction

This report only comments on Environmental Health (EH) impacts of the proposed development. We have made observations and submissions on the following specific EH areas;

Ground and surface water

Background

The installation is licenced under Class 2.11 of the First Schedule to the EPA Act 1992 as amended. P0606-03 was granted on 16/03/2011 and the licence is now held by SSE Generation Ireland Limited. The licensee proposes to amend the requirement to cease discharging at emission points SW-7 and SW-8, to include emission point SW11, to update the licence in line with Commission Implementing Decision (EU) 2017/1442 of 31 July 2017 establishing best available techniques (BAT) conclusions under the Directive 2010/75/EU of the European Parliament and of the Council, for large combustion plants and to amend the frequency for testing oils on storm waters.

Groundwater

The water quality in ground water wells on site are currently monitored at set frequencies in accordance with the existing licence, some of these monitoring points are in the old landfill areas of the site. Groundwater beneath the site is protected as Drinking Water under the Water Framework Directive. A number of non-compliances with groundwater legislation parameters have been identified during this monitoring. The pollutant materials are determined by the operator to be from historical activities and practices carried out prior to the CCGT development i.e. from biological degradation of waste. The GSI classify the bedrock aquifer as regionally important, fissured bedrock, with extreme vulnerability and rock at or near the surface.

An increase was observed with regard to levels of total and faecal coliforms in some wells both the former landfill area and the station grounds. It is stated in the baseline report that the primary source is considered likely to be agricultural practices in areas upgradient of the site, rather than historic or current site practices, but also however, that there are likely to be some site-derived contributions in particular from the septic tank located on the lower tier. Appropriate remedial measures should be in place to remedy septic tank deficiencies giving rise to bacterial contamination of the water supply.

The concentration of ammonia, aluminium, arsenic and PAH and TPH concentrations above groundwater limits have also routinely been recorded. It is noted that ammonia is used as a chemical for water conditioning on site and hydrocarbons are stored on site, in banded storage. An assessment of the soil analytical data collected by URS during their site investigation also identified potential risks to controlled waters (i.e.

groundwater and surface water) from a number of metals as well as polycyclic aromatic hydrocarbons (PAH) and hydrocarbon indicator compounds. With the exception of antimony, cadmium, mercury and selenium all of the other heavy metals concentrations in samples collected from across all areas of the site exceeded the GACs for controlled waters. Higher concentrations (of hydrocarbon indicator compounds) were recorded in samples collected from the foreshore to the west of the former landfill cells, near the cooling water outlet.

We would be concerned in relation to the water quality results and would recommend further assessment be carried out focusing on identification of likely contamination source(s) giving rise to potential risks to ground and surface waters and the local ecosystems (estuary) and that appropriate mitigation measures be required.

Surface Water

Discharges to SW-8 consists of water from the washing of the filter on the cooling water intake screen which is treated with Sodium Hypochlorite to control biological fouling. An appropriate maximum daily emission limit for chlorine should be applied at this emission point.

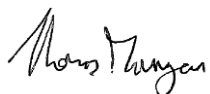
The site is located on eastern bank of the Suir and Barrow River system, the Campile River is located to the south of the site. Water quality in the River Suir is described by the EPA as being 'at risk of not achieving good status' under the Water Framework Directive, while waters in the Campile River and the Barrow-Nore-Suir Estuary are described as being 'possibly at risk of not achieving good status' under the directive. River Barrow estuary is also a proposed Natural Heritage Area and River Barrow and River Suir are designated as Special Areas of Conservation. All required measures should be taken to protect these supplies and SACs. It is stated that there is no dedicated oil interceptor for surface water draining from the 110kV switching yard. Small areas that have potential for causing oil contamination of surface drain water should be separated from the overall surface water drainage and routed through a water/oil separator.

Waterford harbour directly opposite the power plant is a designated shellfish water under the Quality of Shellfish Water Regulations (S.I. 268 of 2006). Shellfish bioaccumulate heavy metals, pesticides and micro-organisms. The effect on small seed mussels and the possibility of effects on possible natural spatting should also be considered.

Assessment of Environment and Health submissions

The Environmental Health Department have not received any complaints from the public in relation to this facility.

Conclusion: The Environment Health Service advises that further measures to investigate and where possible remedy water quality issues would be appropriate.



Thomas Mangan
Environmental Health Officer
Officer
Environment Operational Unit



Kay O Connor
A/Senior Environmental Health
Wexford

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Dial 999 / 112 – Request the service you require: An Garda Síochána, Ambulance Service and / or Fire and Rescue Service

WHEN YOU ARE CONNECTED TO THE REQUISITE SERVICE(S)

<u>GIVE THE FOLLOWING INFORMATION</u>	
This is: _____ Eircode _____ (Name, Telephone Number and Eircode Address of site)	
<i>An incident has occurred at this site - standby for ETHANE message</i>	
E	
	Exact location of the incident
T	
	Type of incident, e.g.: fire, explosion, gas leak, etc
H	
	Hazards – current and potential
A	
	Access and Egress – what is the safest approach route for responding emergency services and where is your emergency services meeting point (RVP)
N	
	Number of casualties and their condition – specify adult / children if known
E	
	The emergency services present and required
<i>N.B. If you require another emergency service stay on the line and repeat the steps again</i>	

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**R.V.P.
No.1**



Environmental Health Service,
Whitemill Industrial Estate,
Wexford
Phone: 053 9114376
anne.deacon@hse.ie

Date: 2nd November 2020

Our reference: 1381

Report to: Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford

EPA reference: P0606-04

Type of Consultation: Licence

Applicant: SSE Generation Ireland Limited, Great Island Generation Station,
Campile, New Ross, W34 Kc62, New Ross, Wexford

Dear Sir/Madam

Please find enclosed the HSE consultation report and the HSE South Emergency Management consultation report in relation to the above Industrial Emissions Licence. If you have any queries regarding any of these reports the initial contact is Ms Anne Deacon, A/Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully,

Anne Deacon
A/Principal Environmental Health Officer