Submission	
Submitter:	Mr. John Moynihan
Organisation Name:	Health Service Executive
Submission Title:	Submission from Health Service Executive
Submission Reference No.:	S011271
Submission Received:	11 August 2023
Application	
Applicant:	SSE Generation Ireland Limited
Reg. No.:	P1201-01

See below for Submission details.

Attachments are displayed on the following page(s).

An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Mílaoise, An Nás, Co. Chill Dara.
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Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency

Date: 11th August 2023

***Type of consultation**:* Industrial Emissions (I.E)

EHIS Reference: 3318

Dear Sir/Madam

Please find enclosed the HSE consultation Report in relation to the above proposal. The following HSE departments were made aware of the consultation request for the proposed development on the 24th July 2023

- HSE South Emergency Management – David O'Sullivan
- Estates – Helen Maher / Stephen Murphy
- Director of National Health Protection – Eamonn O' Moore
- CHO – Michael Fitzgerald

If you have any queries regarding this report please contact, Mr. John Moynihan Principal Environmental Health Officer in the first instance.

Yours Sincerely

Arlene Ward.

Mrs Arlene Ward
Environmental Health Officer

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HSE SUBMISSION REPORT

Environmental Health Service Consultation Report

as a Statutory Consultee (Planning and Development Acts 2000, & Regs made thereunder)

Date:	11th August 2023
Our Reference:	3318
Report To:	Environmental Licensing Programme Office of Environmental Sustainability Environmental Protection Agency
EPA Reference:	P1201-01
Type of Consultation:	Industrial Emissions (Combustion of fuels..thermal input of 50MW..)
Applicant:	SSE Generation Ireland Limited, Tarbert Generation Station, V31 YX52, Tarbert, Kerry
Nature of Activity:	Activity Class 2.1 Combustion of fuels in installations with a total rated thermal input of 50 MW or more.
Location:	Tarbert, County Kerry, Tarbert, Kerry, V31 YX52

General Comment

Details of the application were circulated to HSE stakeholders on the 24th July 2023

- HSE South Emergency Management – David O'Sullivan
- Estates – Helen Maher / Stephen Murphy
- Director of National Health Protection – Eamonn O' Moore
- CHO – Michael Fitzgerald

Introduction

The, SSE Generation Ireland Limited is applying for a new Industrial Emissions (IE) licence for the Temporary Emergency Generation (TEG) plant to be constructed and operated services at the

Tarbert Power Station Site in Co. Kerry. This will consist of three new open cycle gas turbine units and ancillary infrastructure and development, site works and services at the Tarbert Power Station Site in Co. Kerry. This infrastructure will have the capacity to generate 150MWe (net output) of temporary emergency electricity, site development and associated ancillary works required for the operation of the plant. The plant will operate as an emergency plant, with a maximum running time of 500 hours per annum.

The existing Tarbert Power Station is managed in accordance with its Industrial Emissions (IE) Licence P0607-02 and in accordance with the EU Emissions Trading System (ETS) and associated Greenhouse Gas Permit (GHG075-10383-4) as administered by the Environmental Protection Agency (EPA). The Designated Development will be licenced by the EPA under the IE licencing process.

Site Location

The Site is located in Tarbert, Listowel, County Kerry (Co. Kerry), approximately 1.8km north of the town of Tarbert. The Designated Development Site is situated north of Tarbert, Co. Kerry, Ireland (Irish Grid Reference X: 107161; Y: 212865). The entire Site is located within the administrative area of Kerry County Council (KCC). The Site is located within the existing Tarbert Power Station Site boundary which occupies an area of approximately 42ha. The Site is off the N67, a National Secondary road in Tarbert, Co. Kerry, positioned on the west of the existing Power Station and is a brownfield site, surrounded by electricity generating, transmission and fuel storage infrastructure.

Air Quality

The Environmental report 2022-10-28 outlines that a dispersion modelling assessment has been undertaken on emissions associated with the operation of three 50MWe emergency generators operating for up to 500 hours per year on air quality sensitive Special Area of Conservation (SAC) and Special Protection Area (SPA) habitats and selected human health receptors within 15km. It has been outlined that the dispersion modelling assessment has been undertaken with reference to EPA AG4 guidance.

The report outlines that “For human health receptors, the assessment has determined that the impact of the Designated Development and subsequent total pollutant concentrations (PEC) does not result in a significant effect on local air quality”. The assessment did identify “an elevated PC and PEC for 24-hour SO2 at a couple of receptors” which no further details were added to include the specific number of receptors nor the location. The consultant has advised “that was due to the precautionary nature of that assessment.”

The Environmental Health Service is concerned regarding the elevated PC and PEC for 24 hour SO2 at receptors. This is a health protection measure which should not be exceeded. The Environmental Health Service (EHS) recommends that the sampling of emissions is carried out at appropriate times and if exceedances are identified mitigation measures are implemented, monitored and verified. This is for the protection of public health.

The report “concluded that the air quality impact of the Designated Development can be screened as insignificant at all air quality sensitive SAC and SPA habitats and selected sensitive human health receptors.” **The Environmental Health Service would reiterate that ALL sensitive human health**

receptors should be screened instead of selected receptors. This is for the protection of public health.

Noise

The Environmental report 2022-10-28 supporting documentation for the proposed licence concluded that "No significant cumulative impacts are expected to arise from the Designated Development relating to noise, either during the construction or operational phases (with operational mitigation in place)." The mitigation measures referred to are inclusive of silencers, attenuators, low noise plant plus acoustic screens/barriers.

The Environmental report has outlined that with the "adoption of the mitigation measures detailed in this section, all effects are defined in accordance with Table 4.21 and Table 4.22 as either imperceptible or not significant". Construction effects are defined as temporary/short-term, whilst operational effects are short-term, and all are reversible.

The Environmental Health recommends that in addition to the mitigation measures outlined in 4.3.6 Construction Phase and 4.3.7 operational phase mitigation the following measures should also be a part of the licence permit

- **Acoustic screen/barrier mitigation should be incorporated on site as per details outlined in chapter 4.3.7 (Environmental report 2022- 10-28)**
- **That noise monitoring should be undertaken at the nearest occupied dwelling and at other noise sensitive locations in the vicinity**
- **That corrective action should be included in a site specific Environmental Management Plan if exceedances of permitted limits are recorded**

Water (Ground water and Surface water)

The Non- Technical-Summary 2023-07-05 denotes four types of emissions, surface water emissions, storm water, foul wastewater and waste water. For the first type, surface water emissions there are no emissions indicated during the operational phase. For the second type, storm water the installation will not result in significant increases in storm water runoff from the area. For the third type, foul wastewater from the installation admin building will be discharged into the existing Tarbert Power Station. Finally, the waste water will be fed from the existing Tarbert Power Station raw water reservoir, located to the east of the installation site, and pumped to the installation onsite raw water tank. The raw water is then pumped to the WTP, whereby it will be demineralised. Demineralised water from the WTP will be pumped to the demineralised water storage tank. Reject water from the WTP will be pumped to a neutralisation pit. At the neutralisation pit the reject water will be neutralised prior to it being discharged to the existing Tarbert Power Station drainage network. The effluent will be discharged to the Shannon Estuary via the existing licenced SE5 emission point n foul drainage network to the east of the installation boundary.

The Environmental Health Servic (EHS) recommends that storm water from roofs and clean yards is collected/harvested in attenuation tanks for example, to maximise water efficiency and limit potential discharges that may cause flooding in the local area. This is in the context of climate change where the frequency and intensity of precipitation is expected to increase as global temperatures increase. This water could also be included in the management of fire risk on site.

Accident Hazards

As indicated a very significant quantity of gas oil will be transported to, and stored on site. The quantity equates to 5,770 metric tonnes.The installation will store a quantity of ca. 2,730 tonnes of gasoil and would be classified as a 'lower tier' facility. However, the existing Tarbert Power Station site is an 'upper tier' COMAH site. All chemicals and oils are said to be stored in specific storage areas that will be locked, impermeable bunded and fenced off. Significant air emissions are possible in the context of a fire (fuel storage fire in particular) on-site. The EHS welcomes that the SSE will engage with the Health and Safety Authority (HSA) as the Competent Authority in Ireland to review the existing COMAH registration and documentation to include for the additional TEG fuel storage.

The EHS recommends a fire response plan covering prevention, mitigation, preparedness and response to protect nearby sensitive receptors from air pollutants in the event of a fire.

Waste Management

The NTS outlines that waste generated on site will be (a) domestic in nature such as paper and food waste,(b) hazardous wastes such as waste oils and greases and (c) non-hazardous wastes such as clean metal and wood. Opportunities for waste prevention and minimisation in line with the waste hierarchy are also referred to.

The EHS recommends that waste management adheres to the aims of the Circular Economy and Miscellaneous Provisions Act 2022 and there is proper segregation of waste into different waste streams for appropriate handling and management by appropriately authorised waste contractors

Climate Action

The Irish Government declared a climate and biodiversity emergency in 2019 and the Climate Action Plan 2023 sets out a roadmap to halve emissions by 2030 and for Ireland to be a net zero economy by 2050. It is incumbent on every energy consumer to reduce energy consumption and greenhouse gas emissions to protect human health locally and globally.

Conclusions

The following are the recommendations from the Environmental Health Service with respect to the above licence application:-

- **That the sampling of emissions from each of the exhaust stacks are carried out at appropriate times when the generators are in operation.**
- **That waste management adheres to the aims of the Circular Economy and Miscellaneous Provisions Act 2022 and there is proper segregation of waste into different waste streams for appropriate handling and management by appropriately authorised waste contractors**
- **Monitoring is also undertaken outside of 'daytime' hours.**
- **Noise monitoring will continue to be undertaken around the application site. Noise monitoring locations will be reviewed and revised where and as/when necessary.**
- **Corrective action should be included in the Environmental Management Plan if exceedances of permitted limits are recorded**
- **Selection of quiet plant/location of plant; plant which will have the least impact in term of noise will be selected and will be positioned as far away as practical from noise sensitive receptors i.e. private residences.**
- **Plant will only be left running during works and will be switched off at all other times. Plant will not be left idling. No maintenance or repair to plant or machinery will be permitted outside of the permitted construction works hours**

- **The Environmental Health Service recommends that Operators must comply with best practice, legislation and guidelines current at that time so that effects are not significant for local residents.**
- **The EHS recommends that all noise mitigation measures, including the implementation of the noise barrier and suitable monitoring and corrective actions are included as conditions should a licence be permitted. This measure is for the protection of public health**
- **The condition of the access roads to the site is monitored and that any defects identified e.g. potholes or surface cracking are repaired within 24 hours. This is in order to minimise the generation of dust and noise from vehicles and is a health protection measure.**
- **All mitigation measures identified to protect surface and ground water should be implemented in full.**
- **That a complaints procedure is implemented and that a member of staff is designated as a point of contact to deal with any complaints or queries received from members of the public in relation to the proposed activity.**
- **It is recommended that the routine monitoring, maintenance and repair of all plant, equipment and pipework is included as a condition of the licence.**
- **A system should be put in place for dealing with enquiries and/or complaints from members of the public during the operational phase of the facility.**
- **Water monitoring results should be reviewed and where there is indication of contamination or significant dewatering of drinking water supplies additional mitigation should be agreed with the Planning Authority. The effectiveness of the additional mitigation should be verified through a sampling programme. Any wells identified as a drinking water supply and located within 150m of the facility are sampled prior to the commencement of extension works. Sampling parameters should be agreed with the Local Authority. These wells should also be sampled at least biannually during the operational period.**
- **Mitigation measures proposed for the protection of surface and groundwater are implemented in full and are monitored on an on-going basis (as part of an Environmental Management Plan) in order to mitigate any potentially significant effects.**

Kind Regards

Arlene Ward.

Arlene Ward
Environmental Health Officer