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Environment, Heritage and Local Government

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31st July 2009

Angelika Grohmann – Worle
ERM Ireland Ltd.,
Suite 508,
The Capel Building,
Mary's Abbey,
Dublin 7

Re: Draft Scoping for EIS for Proposed Endesa CGCT Power Plant, Great Island, Co. Wexford.

Dear Angelika,

We refer to your correspondence of the 3rd July 2009 looking for comment on the above scoping report. Further to our previous architectural and archaeological heritage observations sent in a letter 29th July, please find below the nature conservation recommendations of the Department of the Environment, Heritage and Local Government.

Nature Conservation

The Great Island site is an existing power generating plant located on a 68 ha site at the confluence of the River Suir and River Barrow. It is anticipated that the introduction of the new technology will bring substantial improvement in relation to effects on the environment (scoping Report - page 5).

The River Barrow is designated as a SAC 2162, and listed for the following species, Freshwater Pearl Mussel (*Margaritifera margaritifera* and *M. m. durrovensis*), Freshwater Crayfish (*Austropotamobius pallipes*), Salmon (*Salmo salar*), Twaite Shad (*Alosa fallax fallax*), three Lamprey species - Sea (*Petromyzon marinus*), Brook (*Lampetra planeri*) and River (*Lampetra fluviatilis*), the marsh snail *Vertigo moulinsiana* and Otter (*Lutra lutra*). This is the only site in the world for the hard water form of the Pearl Mussel *M. m. durrovensis* and one of only a handful of spawning grounds in the country for Twaite Shad. In addition the rare Red Data Book fish species Smelt (*Osmerus eperlanus*) occurs in estuarine stretches of the site.

At the upper edge of the salt meadow bordering the grasslands where there is significant percolation of salt water, the legally protected species Borrer's Saltmarsh-grass (*Puccinellia fasciculata*) (Flora Protection Order, 1987) can be found.

The report seems to state that works will be confined to the existing plant site, so it is not clear what direct effects on the SAC are envisaged. However an appropriate assessment maybe required. Under Article 6 of the EU Habitats Directive (92/42/EEC) an assessment of the possible impact of developments within designated areas is required. Guidance on Article 6 Assessments is provided by the European Commission and can be found at the web site

http://ec.europa.eu/environment/nature/nature_conservation/eu_nature_legislation/specific_articles/art6/pdf/natura_2000_assess_en.

In addition bird species such as golden plover, peregrine, kingfisher and little egret occur within the site (vicinity) – the latter three probably as breeding birds nearby, these are Annex I species under the Birds Directive and timings of works and any potential disturbance to breeding or feeding will need to be addressed.

Where buildings that may have become redundant or in need of upgrading a bat survey will need to be undertaken to establish the usage by any species of bats (all 9 Irish vesper bats are Annex IV of Habitats Directive).

Please acknowledge receipt of this letter and forward any further correspondence to the undersigned at the following address:

Development Applications Unit,
Department of the Environment Heritage and Local Government,
Dun Sceine,
Harcourt Lane,
Dublin 2

Is mise le meas,



David Tuohy
Development Applications Unit
01 8883183
David.tuohy@environ.ie

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-----Original Message-----

From: Nina_Brennan@entemp.ie [mailto:Nina_Brennan@entemp.ie]
Sent: 19 August 2009 15:36
To: Keith Grant
Subject: Proposed Endesa CCGT Power Plants

Keith,

In relation to Endesa Ireland Limited proposal to construct a Combined Cycle Gas Turbine at Tarbert, Co. Kerry and Great Island, Co Wexford, ERM's letters of 6 and 3 July 2009 refers.

My understanding is that the EPA has this Department on a list of consultees for these types of projects. I also understand that these projects are at the draft Scoping Report stage.

The Department of Enterprise, Trade and Employment does not intend making any comments at this time.

Regards,

Nina Brennan
Environment Unit
Competitiveness and International Affairs Division
Department of Enterprise, Trade and Employment
Kildare Street, Dublin 2

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From: Corcoran, Pat [mailto:Pat.Corcoran@agriculture.gov.ie]
Sent: 25 August 2009 10:05
To: Keith Grant
Subject: RE: Great Island Scoping Consultation

Keith,

I am actively engaged on this with our Engineering division at present
– I will let you know as soon as possible – a meeting may be required.

Regards

Pat

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**Environmental Health Impact Assessment on Proposed
Endsea CCGT Power Plant Great Island, Co Wexford. – Draft
Scoping**

Received by:	Date:	
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Thank you for contacting the Health Service Executive (HSE) at this early stage in the Environmental Impact Assessment process.

For your information, the official contact point within the HSE for all Environmental Impact Statements (EIS) for all parts of Ireland is:-

Martin Devine, Assistant National Director Environmental Health
HSE
Oak House
Limetree Avenue
Millennium Park
Naas
Co Kildare.

This is the Environmental Health Service response regarding the possible environmental health impacts of this development as outlined in the Draft Scoping Report forwarded to us.

This is an existing power station which has operated below capacity for a number of years.

We would see 4 distinct stages in the development whose impacts would need to be assessed

1. Decommissioning of the present plant (we note some parts are to be retained)
2. Construction of the new Power Station
3. Operation of the new Power Station
4. Eventual decommissioning of the new plant at the end of it's useful life.

The draft scoping report states that the creation of a Combined Cycle Gas Turbine Power Plant will use less water, etc than the existing plant. Under the section of the EIS discussing alternatives considered we would welcome an explanation from an environmental health viewpoint as to why this new gas and steam powered plant will be superior to rehabilitating or upgrading the present plant or putting in a more modern electricity plant powered by heavy fuel oil and distillate oil.

We note that you are not developing the former waste disposal area, however we would like it clarified as to whether there are any ongoing issues with this area.

With regard to the waste disposal area are there records of the waste disposed of in this area?

Is the waste toxic, mixed or of unknown make-up?

Has the land been assessed and remediated as contaminated land to the satisfaction of the Environmental Protection Agency?
 As it is adjacent to wetlands is there a possibility that leachate from the area is still seeping via the wetlands to the River Barrow or was the site lined originally and capped properly?
 Is there any possibility of gas emissions at this stage?

We note that heavy fuel oil will no longer be shipped in and that back up distillate oil will be coming in by road and stored on site.

With regard to the Water Treatment Plant we note that the premises uses mains water at present. What quantity of raw water will be required? What water treatment chemicals will be used? What chemical residuals will be in effluents as waste due to discharges, backwashing, etc.? How will these be released to the environment.? Will they end up in sediment in the estuary or are they soluble? Could they affect shellfish uptake of heavy metals, chemicals or microbes in the Barrow Suir Nore estuary?

Is the Condenser water in a totally enclosed loop or will this require bleeding off or scouring at intervals? Will any effluents result?

Cooling water will be extracted from the Barrow River but in lesser quantities than previously. The Barrow Suir Nore Estuary is the location of a thriving shellfish industry. Mussels are found on the Barrow Bridge and shellfish beds of varying species extend as far south as Woodstown/Creadan Head on the Waterford side and Lumsden Bay on the Wexford side. Extracting water for use as cooling water will affect the salinity, temperature and pollution load of the river. Due to the historical pollution of this estuary the estuarine muds are polluted with heavy metals, therefore any disturbance of these by construction, decommissioning or discharges may release these metals in a bioavailable form. What is the current status of the river muds at the discharge points including that from those from the wetlands? The shellfish will concentrate any microbial or chemical including heavy metal content of effluent discharges. Since shellfish from this estuary are eaten in large quantities both at home and abroad the effect on shellfish quality is of environmental health significance. The HSE Wexford and HSE Waterford offices have some historical data on shellfish quality in the estuary. However for more up to date data the Sea Fisheries Protection Authority should be contacted. The local office is based in Dunmore East and the national office is based in Clonakilty, Co Cork. They will have data on the current classification of the estuary, the aquaculture industry based therein including likely future developments and current sampling.

From a pollution point of view the Barrow Suir Nore is only of intermediate status until it enters Waterford Harbour.

The effect of new water abstraction rates on floodwaters should also be assessed as well as whether increased surface water due to increased hard standing will require flood storage. Flood conditions can affect particularly the microbiological quality of shellfish as well.

Is the Distillate oil system new or utilising some of the older fuel tanks? If not what are the older tanks to be used for?

We note the structure and scope of EIS proposed.

When the construction project is underway how is it proposed to house and cater for the construction crew? How many will be in the crew?

Is it stated that it is intended to recruit locally. Will a specialist crew also be required? Will any of the crew be accommodated on site or just locally in adjacent towns and villages?

The staffing at the present power plant has been reduced considerably in recent years. How many staff will be needed to staff the power plant during its' operational phase?

We note your comments re noise and vibration and traffic. As well as assessing noise during operation noise and vibration during construction including that from traffic should be assessed. Is it envisaged that any extra large construction elements will be brought to the site. Are these to be transported in by road or sea? We would anticipate that during the construction period there would be an increase in general and heavy traffic in and out of the site compared to the present situation which is very quiet. Also piling, blasting, and general construction noise and vibration would need to be assessed. With regard to Noise the hours of operation of a construction site especially in a quiet rural area are important. Would any overnight working be envisaged? What are the proposals for weekends and public holidays? Hours of operation on construction sites has led to public complaint to this office in the past.

With regard to soil a sediment management plan will be required to ensure that airborne dust or mud does not escape onto adjoining lands or into the river causing contamination and nuisance.

Duncannon beach is heavily used for bathing although it has lost its Blue Flag status in recent years. Other beaches used for bathing by locals include Dollar Bay and Boley Bay on the Wexford side as well as some on the Waterford side.

We note that air pollution will be assessed. It is important that this plant will comply fully with emission standards from 2012 forwards when operating. We note that more stringent emissions legislation is being proposed at EU level at present.

We note that you state the new exhaust stack for the dispersion of hot gases is likely to be lower than the existing stacks. What is the proposed dispersion area for the gases given the reduced height of the stack and what concentrations of pollutants will be in the emissions? What effect will different wind conditions on dispersion area and heavy rain have on local deposition?

The site is adjacent to Campile and Cheekpoint as stated. However, from an air pollution point of view will the dispersion area of the station intersect with the dispersion clouds generated by industry in Waterford City but particularly from the eastern side of same? Are there any anticipated cumulative effects? As the crow flies Waterford City and environs is within 10km of the proposed power plant. What mitigation is envisaged to reduce any adverse effects? New Ross and several smaller villages such as Ballyhack, Aurhturstown and Duncannon are also nearby.

What arrangements are being made with regard to the handling of waste. We would recommend a waste management plan would be prepared to address minimal waste production, waste segregation, waste collection, waste recycling and waste disposal. Waste during decommissioning, construction and operation needs to be addressed. Is it anticipated that any hazardous waste will be involved in the decommissioning?

Since much of this site has remained undisturbed for a number of years and it is adjacent to a river with international port traffic it is important that a pest control program is in place throughout the site with regard to rodents and insects and that staff are aware of the risks associated with neglecting good practices in this regard.

We note that a new Gas pipeline will be required. Is this to be part of a separate application? I think an indication of the possible route of this pipeline or a reference to the development should be included in this assessment as one project requires the other to proceed. Will or has a separate assessment/application been processed regarding the pipeline? We would recommend that the permission and all other requirements for the pipeline must be in place before this development would proceed.

We note that an Integrated Pollution licence is required at this facility, therefore we would recommend that this requirement would be in place to the satisfaction of the Environment Protection Agency before this development would proceed.

Since the present 220KV station is being retained does this mean that the distribution system from the Power Plant is remaining as is? If new power lines are proposed are these the subject of a separate application? Will there be any increase in electromagnetic radiation as a result of the development?

We would like to visit the site when a set of site plans and layout drawings are available so that we can survey it and the adjoining area as we feel this would be invaluable in assessing the development. We would welcome the presence of one of the EIA team during this visit to clarify queries, if possible.

Anne Deacon SEHO 27/7/09
Environmental Health Service,
Health Service Executive,
Whitemill Industrial Estate,
Wexford. Anne.deacon@hse.ie