# 11 SURFACE WATER

This chapter evaluates the impacts, if any, which the development will have on Surface Water as defined in the Environmental Protection Agency (EPA) 'Advice Notes on Current Practice (in the preparation of Environmental Impact Statements'), 2003.

This chapter has been prepared based on a number of previous assessments of the site, the most recent of which was completed as part of an EIS and planning application submitted in 2009. It is considered that the primary assessment undertaken at the site in 2005 addressed the primary impacts potentially affecting the surface water aspect. This chapter will assess the impact of proposed amendments to the existing planning permission as described in Chapter 1, on the surface water of the site and environs. The amendments will entail some additional construction in the form of conversion of two temporary office and maintenance structures respectively to permanent structures, the installation of an additional foul water treatment plant system and associated hardstanding surfaces and parking.<br>  $\frac{1}{\sqrt{2}}$ 

As the facility has now been constructed, a number of mitigation measures recommended in previous EIS's have now been implemented. This chapter therefore represents an update of the 2009 assessment to include the results of mitigation measures as implemented and identify any further mitigation measures now required. New legislative standards for surface water quality (SI 272 of 2009) have been considered in determining the impact on the local surface water environment. For inspection purposes on the local surface of constructed, a number of mitigation of mented. This chapter of conservation of mitigation of measures as implemented. New legislative standards for surface vertice in the loc

# 11.1 **DRAINAGE NETWORK**

# Regional

The development site lies in the River Nanny catchment (Figure 11.1). The River Nanny rises in the south-east of Co. Meath and flows through Duleek towards Laytown, where it discharges to the sea.

Data obtained from the EPA indicates an estimated dry weather flow of 0.009  $\mathrm{m}^3$ /s and a 95 percentile flow of 0.059  $\mathrm{m}^3$ /s on the nearest hydrological station located on the River Nanny at Duleek.

The River Nanny channel is located approximately 2 km south of the development site. Surface water in the vicinity of the site drains naturally towards the river.

## **Local**

The site lies within the Nanny River Catchment which is part of the Eastern River Basin District (ERBD as defined under Irelands programme for the implementation of the Water Framework Directive (WFD) (2000/60/EC). Surface water on and in the vicinity of the site drains through land drains and ditches towards the local streams that flow to the River Nanny. The drainage ditches are mostly dry in the summer months.

# 11.2 SURFACE WATER QUALITY

In December 2011, KD Environmental completed an assessment of surface water discharges from the facility and their potential impact on the River Nanny. This study is presented in Appendix 11.1 The study found that the River Nanny is not impacted by surface water discharged from the site when discharged at the permitted flow rate of <130m3/hour.

A limited amount of chemical and biological quality data for the River Nanny is available from the EPA. Results generally indicate moderate quality surface water in the Nanny at the nearest monitoring stations to the site (approximately 2km away). An average Q-value of 3-4 was noted across the various stations on the Nanny from 2010 monitoring. This is consistent with data available for previous monitoring rounds since 2001.

The 2008 ERBD Characterisation Report stated that the River Nanny catchment is considered "At Risk". Agricultural runoff was identified as the dominant cause of poor water quality in the Nanny/Delvin Catchment. The available biological and water quality monitoring records indicated that 16% of monitoring stations are considered unpolluted,  $33\%$  of slightly polluted, 52% of moderately polluted and 8% seriously polluted. Overall some improvement in quality has been noted over the last 10 years but pollution levels are considered unacceptably high. For idea as the dominant cause<br>plogical and water quality<br>lered unpolluted,  $\frac{25\%}{600}$  sline<br>erall some improvement in q<br>red unacceptably high.<br>**PRAINAGE NETWORK** In Report stated that the River Naminy<br>
Led as the dominant cause of poor v<br>
logical and water quality monitoring<br>
ered unpolluted,  $\frac{250}{(1000)}$  sightly polluted<br>
In the improvement in quality has<br>
red unacceptably hig

# 11.3 PROPOSED DRAINAGE NETWORK

# 11.3.1 Foul Water/Sanitary Management

# **Construction**

During the construction phase, domestic effluent generated on the site will be managed through the existing domestic effluent treatment systems. It is not anticipated that there will be any need for temporary portaloos or other temporary sanitary facilities as there are already sufficient provisions in place at the site.

# **Operation**

Domestic sewage from toilets, changing and kitchen areas currently discharges via the foul drainage system, depending on its location on site, to on site effluent treatment systems which pass through an engineered percolation area to ground. The existing percolation areas have been designed and constructed in accordance with the guidelines in the EPA's Wastewater Treatment Manual (Treatment Systems for Small Communities, Business, Leisure Centres and Hotels, 1999). It is proposed that an

additional system will be installed for the proposed modular office block. The system will be designed and constructed in accordance with the requirements of the recently published EPA Guidance on the Authorisation of Discharges to Groundwater.

# 11.3.2 Industrial Effluent

## **Operation**

Industrial effluent will be contained within the site and evaporated within the incineration process. There will be no discharge of process effluent to the drainage network. As the flue gas cleaning system is a combination of a semi wet and dry lime injection process, there will be no effluent at all from the flue gas treatment process. All water injected in the semi –wet stage is evaporated in the spray reactor. Some wash waters from cleaning operations will be directed to the spilled water storage tank and will be either evaporated in the spray reactor, or transported off-site for treatment or disposal to an appropriately permitted or licensed facility.

## 11.3.3 Storm Water Management

## Construction

Storm water management during the required construction works will be controlled in accordance with the site Environmental Management Plan (currently being agreed with the Agency) and any planning conditions set down by the planning authority,  $\sqrt{r}$  he facility (ref W0167-02) licence provides for monitoring of such issues as dust generation, noise generation, traffic management and surface water run-off. **OR INSPECTION** mg the required construction works will<br>ement Plan (currently being agreed will planning authority). The facility (ref<br>ust generation, trafficially (ref<br> $\begin{pmatrix} 0 & \sqrt{2} & \sqrt{2} \\ \sqrt{2} & \sqrt{2} & \sqrt{2} \\ \sqrt{2} & \sqrt{2} & \sqrt{2} \\ \sqrt{2} & \sqrt{2$ 

Run off generated during construction will be directed to the existing surface water drainage system (including interceptors, attenuation pond, monitoring stations etc) prior to its discharge to the local drainage network. A wheel wash will not be required for the construction phase due to the limited nature of the construction activities associated with the proposed development.

## **Operation**

## Process Building

All waters produced from wash down etc. within the waste processing building will be directed to a spill tank located to the east of the bunker building and underground. The spill tanks (2 tanks) have a capacity of 100 $m<sup>3</sup>$ . As described above, water from this spill tank will be used to supplement process water requirements or will be transported off-site for treatment or disposal to an appropriately permitted or licensed facility. There will be no process effluent from the facility.

During shutdowns there may be a need to drain the boiler which is filled with approximately 130m<sup>3</sup> of clean de-mineralised water. Some of this water will be pumped to the spilled water tank for re-use in the process and the remainder to the stormwater network where it will pass through two sets of TOC monitoring equipment prior to discharge.

# Site Drainage

The site storm water drainage system has been designed in general accordance with Sustainable Drainage Systems (SuDS) principles and will collect rainwater from all roofs, hardstands, roads and grassed areas which fall naturally towards these areas. The proposed amendments will entail some alteration to the existing drainage system but in the main the existing infrastructure will remain. There will be no need for any additional stormwater attenuation capacity. The existing design has been agreed and is in accordance with the requirements of Meath County Council.

Sustainable drainage systems aim to mimic as closely as possible the natural drainage of a site in order to reduce the impact of flooding and water pollution. The subject site is essentially divided into two parts, firstly the northern 6.8 Ha. 'developed' part of the site, and secondly the southern 3.6 Ha. 'undeveloped part of the site. The southern 'undeveloped' part of the site, is drained naturally. Stormwater will continue to be collected by the existing system of field boundary ditches for ultimate outfall to the River Nanny. Similarly infiltration trenches have been installed to intercept overland stormwater flow from the undeveloped areas before reaching any of the proposed areas of roads and hardstanding. This intercepted flow will be directed to the original field ditch boundary drainage system. Due to the natural south to northslope of the ground, storm waters emanating from the development will not flow naturally to the undeveloped part of the site. Landscaping works have now been completed in this part of the site but will take some time to become fully established. Once established the trees and shrubs planted, will have the beneficial effect of increasing the "residence time" of the storm flows thereby reducing downstream effects. thereby reducing downstream effects. From the directed to the original field<br>porthslope of the ground, storm waters<br>indeveloped part of the site. Landscaping<br>take some time to be site. Landscaping<br>take some time to be site. Landscaping<br>the beneficial effect o

The design principle for the northern portion of the site is to largely manage runoff flows and pollutants on the site rather than directing them to the nearest receiving waters. In addition good housekeeping practices, retention and regular monitoring (i.e. testing) will ensure the potential for contamination is minimised. Good housekeeping measures include reusing waste contaminated water in the process itself, as detailed above. Waste contaminated water that is not required in the process will be diverted to the spilled water tank and sent for disposal or treatment at an appropriately licensed facility. It is therefore highly unlikely for such waste contaminated water to pollute any receiving waters.

In accordance with SuDS, consideration was given to surfacing roads and hard standings with pervious paving. However given the risk of spillage onto these areas from attending refuse lorries, with subsequent possible contaminated runoff, the existing surface water drainage system routes the surface water from roads and hardstanding to a monitoring station and from there to the firewater retention tank if contaminated, or to the natural watercourse via a petrol interceptor if uncontaminated. The proposed amendments require the conversion of two temporary structures to permanent use; a 375sq m maintenance building and a 396sq m office block. The maintenance building is accompanied by a hardcored laydown area (to be used during annual maintenance shutdown). The office building requires

the development of a paved access road and hardstand outside of the building. 22 Nr additional parking spaces are also to be provided at the main car park. In the case of the Buildings and the additional carparking it is proposed that the run-off from these areas will drain in to the site storm water drainage system.

In order to prevent flooding of the ditches downstream of the facility a discharge rate from the site based on the Dublin City Council Storm Water Management Policy and by agreement with Meath County Council of 59.8 litres/second has been incorporated into the existing drainage design. Attenuation for a 1 in 30 year storm will be provided by the storm water attenuation pond which discharges via a pump to an external drainage ditch. Attenuation of 1 in 100 year storm occurrences will also be contained within the attenuation pond (see Appendix 11.2 for calculations- revised to account for the new structures and additional surfaces). Based on these calculations it is confirmed that the system has the capacity to accommodate the discharges from the additional areas. In the event of a greater than 1:100 year storm occurrence, the paving has been designed sloping away from the building meaning any flooding that may occur will flow away from the building towards proposed and existing land drains. The provision of the above system allows the maintenance of the current discharge characteristics to the ditches serving the site i.e. flows similar to that generated from agricultural land. This will prevent downstream flooding due to "flash flooding" from the sites. Consent of co

See Figure 11.2 for a flow diagram of the proposed storm water management system. From the sites.<br>
From the proposed storm when the state of the proposed storm where<br>  $\frac{1}{2}$ <br>  $\frac{1$ 

# **11.4 POTENTIAL IMPACTS**

# Construction Phase

The construction phase will consist of construction of roads, hardstanding areas, car parks and other ancillary structures as specified earlier in this EIS and as detailed in Chapter 18, Construction.

The main potential impacts arising out of these works will consist of the following:

- Run-off from bare earth surfaces will contain silt and clay particles. Excessive amounts of silt entering the surface water system could clog the stream beds.
- **Hydrocarbon contaminated water entering the drainage network has the potential to contaminate** the surface water.
- Sewage or canteen effluent entering the surface water system has the potential to contaminate the surface waters.

# Operational Phase

The main potential impacts associated with the operational phase will comprise the following:

- Run-off from the site has the potential to impact on surface water quality.
- Fire water run-off generated by a fire occurring in any of the buildings causing uncontrolled flows to the storm water drainage system have the potential to impact on surface water quality.

# 11.5 MITIGATION MEASURES

# Construction Phase

The following mitigation measures will be implemented during the construction phase:

It is anticipated that the existing storm water management system will be used to manage any potentially silt laden run off during construction works. In the event that temporary settlement tanks are required, written agreement will be sought from the planning authority for details of temporary settlement tanks/silt traps/oil interceptors to control discharges of site surface water run-off during the construction period. The concentration of suspended solids (SS) of the surface water run-off from the site construction works, for discharge to surface waters, will not exceed 30 mg/litre.

During the construction phase of the development, oil and the storage tanks, chemicals and all other materials that pose a risk to waters if spilled, will be stored in designated storage areas, which are bunded to a volume of 110% of the capacity of the sargest tank/container within the bunded area(s). The existing designated storage areas at the facility will be used to minimise risks of spillages during the construction period. Filling and draw-off points will be located entirely within the bunded area(s). Drainage from the bunded area(s) will  $\frac{1}{2}$  diverted for collection and safe disposal. Bunded pallets will be used for storage of drums. of the development, oil and<br>waters if spilled, will be sto<br>of the capacity of the sto<br>of the capacity of the stage<br>ge areas at the facility will be<br>added and draw of the points will be<br>added in the diverted for collection Conservation of the development, oil and the store<br>of the development, oil and the store<br>waters if spilled, will be stored in des<br>of the capacity of the stored in des<br>of the capacity of the stored in des<br>and draw-off poin

During the construction phase all domestic effluent generated on site will discharge to existing sewage treatment facilities. It is not proposed to provide portaloo or other additional sanitary facilities.

During the earthmoving/excavation phase of the proposed construction works site construction roads will be sprayed with water during dry periods to mitigate against the formation of dry dust particles and road sweepers will be operated as required to keep public roads clean.

# Operational Phase

There will be no discharge of process effluent to the drainage network.

Fuels and oils used on site during the operational phase will be stored in tanks located in concrete containment bunds. Fuel oil and bulk ammonia tanks are located outside in double skinned tanks.

Domestic effluent will be treated depending on its location at one of three foul water treatment systems and discharged to the relevant percolation area.

Chemicals or other potentially polluting substances will be stored in the designated storage areas within the main process building which is bunded.

Run-off from clean hard surfaces on site including the roofs of the buildings, site roads, car parks, hardstanding areas and ancillary buildings will be collected into the surface water drainage system as detailed in Section 11.3.3 above.

All drainage arrangements will comply with the requirements of the planning authority for such works and services.

All sludge from the drainage system, bunds, silt traps and oil interceptors will be regularly collected for safe disposal.

An adequate supply of containment booms and/or suitable absorbent material to control, contain and absorb any potential spillages will be maintained at the facility. From Purpose

# Firefighting and Firewater Retention

Fire suppression is provided by an on site did purpose water storage tank. This tank has an overall capacity of 2,185m<sup>3</sup> with an effective fire-fighting storage volume of 1855m<sup>3</sup> and a process water storage capacity of 330m<sup>3</sup>. The fire fighting effort is supported by 2 diesel fire pumps connected to a fire main and hydrant system throughout both the site and buildings. This will be further augmented by Local Fire Service capabilities. In the event of a fire, the process water requirement will not be needed and potentially all 2,185m<sup>3</sup> will be available for fire fighting. All staff are trained in Emergency Response techniques in order to deal with emergencies including fire fighting. ment booms and/or suitable absorbent<br>
will be maintained at the facility.<br> **Retention**<br>
Conserved for any other store<br>
of conserved for any other store<br>
effective friendshing storage volume<br>
in fight of a fire, the process

The facility has achieved compliance with the Building Regulations with particular reference to Part B (Fire), i.e. a Fire Safety Certificate has been obtained; and will continue insofar as practicable follow the recommendations in the Code of Practice for Fire Safety in Buildings – BS5588 which is referred to in Technical Guidance Document B (Fire) to the Building Regulations. The modular offices and the warehouse will be submitted to the Local Authority for certification purposes.

The greatest potential for fire at the facility arises within the waste bunker where localised heating can occur due to decomposition of organic material. As detailed in Section 5, localised fires within the waste bunker are lifted using the grab crane, into the hoppers which transfer the waste directly to the furnace. Up to the level of the tipping hall, the bunker has a capacity of 5,670m<sup>3</sup> approximately. If a 50% voidage ratio is assumed for the waste, then there would be a retention capacity of 2,835 $m<sup>3</sup>$ 

within the waste bunker. With  $2,185m^3$  of water available for fire fighting, this demonstrates that all of the water will be retained within the bunker even in the most extreme fire event.

If a fire occurred in the turbine area, the fire fighting water would be collected in the cellar beneath the turbine which has a capacity of circa  $1,000$  m<sup>3</sup>. As outlined in Chapter 9, the waste bunker has been designed conservatively with 1.1m thick walls and 800mm base and secondary containment system. It will therefore retain any fire water generated within the bunker.

With respect to fire occurring elsewhere in the process building or other buildings on site, the design philosophy as outlined in the 2009 EIS and as represented in Figure 11.2 remains unchanged.

The firewater retention tank volume of  $300\text{m}^3$  remains unchanged and has been calculated using the German LÖRÜRL Methodology for the calculation of retention volume.

A Fire Water Risk Management Programme was prepared in July 2011 to comply with Condition 3.7 of Indaver's Waste Licence W 0167-02 and has been attached in Appendix 11.3.<br>  $\sim$ 

A schematic of the effluent streams and their management is presented in Figure 11.2.<br> **A SCHEEP AND A PARA CONSCRESED AND TAAPLALE TAAPLALE** 

# 11.6 RESIDUAL IMPACTS

The existing surface water management system is adequately designed to prevent uncontrolled discharges to the outfall ditch by the provision of two layers of monitoring and a controlled discharge system. As a result of the proposed amendments there will be no significant negative impacts on the existing surface water management.<br>
Existing surface water management of two activity of the existing surface water management<br>
discharges to the outfall ditch by the provision of two layer<br>
system. As a result of the prop Conserved and their management is three will be no since the provision of two layers of monosed amendments there will be no since the conserved with the provision of two layers of monosed amendments there will be no since



<sup>©</sup> WYG EPA Export 25-04-2012:04:20:40



Appendix 11.1

Consent of copyright owner required for any other use.

# Indaver Ireland Ltd. Carranstown, Duleek, Co. Meath

# **Surface Water Assimilation Capacity Study**



**KD Environmental** 17 Eastham Court, Bettystown, Co. Meath Report No 2011/49/03

### $1.0$ **Introduction**

KD Environmental were commissioned by Grace McCormack of Indaver Ireland to perform an assimilation capacity study of surfacewater discharged from the Indaver waste facility to the River Nanny.

The Indaver Ireland waste facility is situated at Carranstown, Co. Meath approximately 1.5km from the town of Duleek. Surrounding land use is agricultural with some private residences in the immediate vicinity of the Indaver facility.

Surface water runoff from roofs, yards and hardstand areas is held on site within a surfacewater lagoon and is continually monitored for discharge parameters of conductivity, pH and Total Organic Carbon as per schedule C.6.2 of EPA waste license W0167-02. Surface water is only discharged if parametric trigger limits set for these parameters is met and should any parameter exceed these limits, the surface water is retained in the lagoon pending investigation and treatment if required. Parametric trigger limits were set by Indaver and are included in section 8 of this report.

not been discharged.

This report performs an assimilation capacity for determine whether the River Nanny<br>which receives the Indaver surface water, will experience a significant rise in conductivity<br>level as a result of discharging the Indaver Conserved to complete the consequentially the<br>since water and consequentially the<br>similation capacity: to determine v<br>urface water, will experience a sign<br>g the Indaver surface water with the<br>dy to determine the capacity o

### $2.0$ **Receiving Water**

The surface water, SW1, is pumped from the holding lagoon into a drainage ditch. This ditch crosses neighbouring farm land for approx. 1.5km. The drainage ditch forms part of the River Nanny catchment area and surface water will enter the Nanny in the vicinity of the town of Duleek along with other land drains in the area.

The River Nanny enters the sea at Laytown, Co. Meath approx. 13km from the Indaver site and the Nanny estuary and shoreline is a designated Special Protected Area (Site Code 004158). The monitoring location on the Nanny for the purposes of this report was approx. 10km upstream from the SPA.

The OPW have in the past performed flow monitoring on the River Nanny both upstream and downstream of Duleek. The OPW flow readings downstream of Duleek are used to calculate the assimilation capacity of the River Nanny to receive the surfacewater from the Indaver site. OPW flow data is included as Appendix 1 of this report.

### $3.0$ Methodology

Samples of both the River Nanny and the SW1 surface water were taken on 3 separate days and analysed in-situ for Conductivity. In-situ analysis of pH, Total Dissolved Solids, Dissolved Oxygen and Temperature was also performed. A 1L sample was also taken and sent to Fitz Scientific Laboratories in Drogheda, Co. Louth for analysis of Total Organic Carbon. Laboratory certificates of analysis are included as Appendix 3 of this report.

The sampling point on the river Nanny was approx. 1.5km downstream of Duleek and approx. 3km from the Indaver site.

In situ analysis was performed by KD Environmental. pH, TDS and Conductivity were measured using a Hanna HI 98129 'Combometer' which was calibrated using known buffers before use on each monitoring day. The meter was checked using a pH 4.01 buffer and a 500uS/cm buffer and all readings were within a 2% acceptance range. Dissolved oxygen and temperature were measured using a Hanna HI9146 DO meter. The DO meter was air calibrated before use.

For inspectivity and TOC of the River Nia<br>rge. Predicted conductivity levels a<br>SI 294 of 1989, limit for conductivity levels a<br>SI 294 of 1989, limit for conductivity<br>same compared to the 1989 Surfa<br>Class A3 surface waters.





# **Table 2: River Nanny Water**



## $5.0$ **Conductivity Assimilation Capacity Calculations**

# Formula:

C final =  $(C$  back \* F river $) + (C$  discharge \* F discharge $) / (F$  river + F discharge $)$ 

C final=Resultant concentration after discharge (uS/cm)

C back=Background Conductivity in river (uS/cm)

F river=Flow in river (m3/s)

C discharge = Average Conductivity in discharge (uS/cm)

F discharge=Flow of discharge (m3/s)

## $5.1$ Using 50%ile flow data

C final = (C back \* F river) + (C discharge \* F discharge) / (F river + F discharge)

Change in River Nanny conductivity 13 uS/cm  $\frac{dN}{dN}$  and  $\frac{dN}{dN}$  and **S.2** Using 95% ite flow data  $\frac{1}{200}$ <br>C final = (C back \* F river) + (C discharge \* F discharge) / (F river + F discharge)

# $C \text{ final} = 810 \text{ uS/cm}$

Change in River Nanny conductivity 115 uS/cm

Cons

## 6.0 **TOC Assimilation Capacity Calculations**

# Formula:

C final = (C back \* F river) + (C discharge \* F discharge) / (F river + F discharge)

C final=Resultant concentration after discharge (mg/L) C back=Background TOC in river (mg/L) F river=Flow in river (m3/s) C discharge = Average TOC in discharge (mg/L) F discharge=Flow of discharge (m3/s)

## $6.1$ Using 50%ile flow data

C final = (C back \* F river) + (C discharge \* F discharge) / (F river + F discharge)

Change in River Nanny TOC: None, -0.04 mg/s and developed the state of the sta C final = (C back \* F river) + (C discharge \* F discharge) / (F river + F discharge)

# C final =  $5.01$  mg/L

Change in River Nanny TOC: None, - 0.38 mg/L

Conser

Note: The SW1 discharge applies a slight dilution factor to the Nanny TOC levels as the discharge has a lower TOC concentration than the analysed TOC levels in the River Nanny water. This results in a slight reduction in TOC levels in the Nanny.

## $7.0$ **Assimilation Capacity Results**

Table 3 below compares predicted conductivity levels in the River Nanny downstream to conductivity limits for Class A1 waters under the 1989 EC (Quality of Surface Water Intended for the Abstraction of Drinking Water) Regulations, SI No. 294 of 1989.

As there are no limits for TOC specified under the 1989 Surface Water Regulations, Table 4 compares the predicted TOC levels in the River Nanny downstream to COD limits for Class A3 waters under the 1989 EC (Quality of Surface Water Intended for the Abstraction of Drinking Water) Regulations, SI No. 294 of 1989. There is a direct relationship between COD and TOC levels in surface water.

# Table 3: Conductivity Results vs. Class A1 water status





## 8.0 **Trigger Limits**

Trigger limits have been set by Indaver for conductivity and TOC levels in the SW1 to prevent pollution in the receiving water body being caused by the discharge.

A warning limit of 650 uS/cm and a control limit of 800 uS/cm have been set for Conductivity. A warning limit of 15 mg/L and a control limit of 20 mg/L have been set for TOC.

Assimilation capacity calculations in this report show that conductivity levels exceeding these trigger limits would not affect the quality of the River Nanny water following discharge of SW1.

It is suggested that a review of these trigger limits is made by Indaver as use of salt to prevent slipping on hardstand walkways will cause a breach of these conductivity trigger limits in the future.

TOC discharged at the warning limit of 15 mg/L or the control limit of 20 mg/L would not exceed the COD limit for class A3 waters under the 1989 Surface Water regulations. SW1 analysis results are significantly lower than the TOC warning limit. However, there may be scope to increase TOC warning and control limits if required and this is outlined in the conclusion section of this report.

## $9.0$ **Conclusions**

The discharge of the SW1 surface water to the River Nanny will not cause a significant increase in conductivity of the river when discharged at the concentrations averaged in table 1 of this report and at a rate of 130m<sup>3</sup>/hour. The fact that the Nanny has a much larger flow than the discharge rate of the Indaver surface water and that the Nanny has relatively low conductivity levels, allows for the current surface water held in the lagoon to be assimilated into the river water without causing significantly high conductivity levels in the river water.

Using the assimilation calculations, the OPW flow data and the analysis on the River Nanny conductivity levels, a surface water discharge with higher conductivity levels or a discharge at a greater rate could be accommodated by the Nanny. The Indaver discharge is set at 130m<sup>3</sup>/hour or 0.036m<sup>3</sup>/sec. At this discharge rate it is predicted that a conductivity level in the discharge of 1800uS/cm would have no detrimental effects on the R. Nanny conductivity levels.

premises in the area.

Trivate agricultural land and respect<br>trivate agricultural land and respect<br>unaccounted for sources of conducts<br>is agricultural discharges and surface<br>ly dependent on total from concentrate<br>urement alone does not determine as agricultural discharges<br>tly dependent on totals for<br>surement alone does not discharge with a low conduintrations<br>is can be significa<br>example is expected to 1989<br>on are compared to 1989<br>in the a direct comparison of the receiving waterbody.

physical and chemical treatment to render them safe as drinking water. For these reasons the current TOC trigger limits could be increased but it is recommended that they are only increased to 25mg/L for warning limits and 30mg/L for control limits even though assimilation capacity calculations suggest that higher TOC discharge concentrations could be accommodated by the River Nanny.

In summary, the discharge of surface water analysed from the holding lagoon at the Indaver site will not have a significant impact on the conductivity levels of the River Nanny water when discharged at 130 m<sup>3</sup>/hour.

The increased conductivity levels in the surfacewater discharge are due to presence of sodium chloride or salt used to prevent slipping on icy hard stand areas. This will not pose significant environmental hazards to the River Nanny.

The River Nanny has the capacity to assimilate Indaver surface water discharges with higher conductivity and TOC levels than the current trigger limits set for the SW1 discharge.

Conseil of Contribution of the division of the and direct use.

id feller

**David Kelly Technical Manager KD** Environmental

5<sup>th</sup> January 2012

Report No. 2011/49/03

# **Appendix 1**

 $\bar{t}$ 

 $\bar{\omega}$ 

# **OPW River Nanny Flow Data**

Consent of copyright of the purposes only. and other use.

# **Summary Statistics Data**

. Hydro-Data Home . Contact Us . Search Query . Search Results . Map-Finder . Online Questionnaire

# **Summary Statistics Data**

. Daily Mean Flow Data . Daily Mean Level Data . Annual Maxima Data





Note 1 : Data extracted from the Environmental Protection Agency publication 'Hydrological Data', July 1997



**COMMENTS / NOTES** 

Poor quality low flow data - to be used for indicative purposes only.

# **Appendix 2**

 $\alpha = 1$  , and  $\alpha = 1$ 

 $\sim 10$ 

j.

 $\omega_{\rm c}$  and

# **Assimilation Capacity Calculations**



Formula:

C final = (C back \* F river) + (C discharge \* F discharge) / (F river + F discharge)

- C final=Resultant concentration after discharge (uS/cm)<br>C back=Background Conductivity in river(uS/cm)<br>F river=Flow in river (m3/s)
	-
- 
- C discharge =Average Conductivity in discharge (uS/cm)<br>F discharge=Flow of discharge (m3/s)
	-



Formula:

C final = (C back \* F river) + (C discharge \* F discharge) / (F river + F discharge)

- C final=Resultant concentration after discharge (mg/L)
- 
- 
- C back=Background TOC in river (mg/L)<br>F river≃Flow in river (m3/s)<br>C discharge =Average TOC in discharge (mg/L)<br>F discharge=Flow of discharge (m3/s)
	-



**Appendix 3** 

# **Laboratory Certificates of Analysis**

Consent of copyright of the purposes only. and other use.



**Monitoring and Testing Services** 

**Unit 35,** Boyne Business Park, Drogheda, Co. Louth treland Tel: +353 41 9845440 +353 41 9846171 Fax: Web: www.fitzsci.ie info@fitzsci.ie email



# **CERTIFICATE OF ANALYSIS**

# **Test Parameter**

**Total Organic Carbon** 

**SOP Analytical Technique** Conseit of Contribution of the division of the and direct use. 316 TOC analyser (NPOC)

**Result** 4.10 **Units** Acc.  $mg/L$ 

arn Sianed :

Date:  $2C||2||$ 

Aoife Harmon - Technical Supervisor Acc.: Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C Results shall not be reproduced, except in full, without the approval of Fitz Scientific Results contained in this report relate only to the samples tested \*\*The analytical result for this parameter may not be reflective of the concentration present at the time of sampling. The maximum recommended preservation time for this parameter has been exceeded.



**Monitoring and Testing Services** 

**Unit 35.** Bovne Business Park, Drogheda, Co. Louth Ireland +353 41 9845440 Tel: +353 41 9846171 Fax: Web: www.fitzsci.ie email info@fitzsci.ie



# **CERTIFICATE OF ANALYSIS**

## **Test Parameter**

**Total Organic Carbon** 

**SOP Analytical Technique** Conseit of Contribution of the division of the and direct use. 316 TOC analyser (NPOC)

**Result** 4.04 **Units** Acc. mg/L

 $\sim$ 

signed:  $A$  Hour  $x \rightarrow$ 

Date:  $20|2|1$ 

Aoife Harmon - Technical Supervisor Acc.: Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C Results shall not be reproduced, except in full, without the approval of Fitz Scientific Results contained in this report relate only to the samples tested \*\* The analytical result for this parameter may not be reflective of the concentration present at the time of sampling. The maximum recommended preservation time for this parameter has been exceeded.

# SFitzscientific

**Monitoring and Testing Services** 

**Unit 35.** Boyne Business Park, Drogheda, Co. Louth Ireland +353 41 9845440 Tel: Fax: +353 41 9846171 www.fitzsci.ie Web: email info@fitzsci.ie



# **CERTIFICATE OF ANALYSIS**

# **Test Parameter**

**Total Organic Carbon** 

**SOP Analytical Technique** Conseit of Contribution of the division of the and direct use. 316 TOC analyser (NPOC)

**Result** 3.73 **Units** Acc.  $ma/L$ 

signed: A Haleman

 $Date: 22||3||$ 

Aoife Harmon - Technical Supervisor Acc.: Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C Results shall not be reproduced, except in full, without the approval of Fitz Scientific Results contained in this report relate only to the samples tested \*\* The analytical result for this parameter may not be reflective of the concentration present at the time of sampling. The maximum recommended preservation time for this parameter has been exceeded.

# SFitzscientific

# **Monitoring and Testing Services**

**Unit 35.** Boyne Business Park, Drogheda, Co. Louth ireland Tel: +353 41 9845440 +353 41 9846171 Fax: Web: www.fitzsci.ie info@fitzsci.ie email



# **CERTIFICATE OF ANALYSIS**

# **Test Parameter**

**Total Organic Carbon** 

**SOP Analytical Technique** Conseit of Contribution Pitrosce only and direct use. TOC analyser (NPOC) 316

**Result** 6.02 **Units** Acc. mg/L

Signed: A HOUXUMA

Date:  $20|2|1|$ 

Aoife Harmon - Technical Supervisor

Acc.: Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C Results shall not be reproduced, except in full, without the approval of Fitz Scientific Results contained in this report relate only to the samples tested \*\* The analytical result for this parameter may not be reflective of the concentration present at the time of sampling. The maximum recommended preservation time for this parameter has been exceeded.



**Monitoring and Testing Services** 

**Unit 35,** Boyne Business Park, Drogheda, Co. Louth Ireland +353 41 9845440 Tel: +353 41 9846171 Fax: www.fitzsci.ie Web: info@fitzsci.ie email



# **CERTIFICATE OF ANALYSIS**

# **Test Parameter**

 $\sim$ 

**Total Organic Carbon** 

**Analytical Technique SOP** Conseit of Contribution of the division of the and direct use. 316 TOC analyser (NPOC)

**Result** 5.32 **Units** Acc. mg/L

CLXX Signed:

Date:  $\frac{2c|12|11}{2}$ 

Aoife Harmon - Technical Supervisor Acc.: Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C Results shall not be reproduced, except in full, without the approval of Fitz Scientific Results contained in this report relate only to the samples tested \*\* The analytical result for this parameter may not be reflective of the concentration present at the time of sampling. The maximum recommended preservation time for this parameter has been exceeded.

# SFitzscientific

**Monitoring and Testing Services** 

**Unit 35.** Boyne Business Park, Drogheda, Co. Louth Ireland Tel: +353 41 9845440 +353 41 9846171 Fax: Web: www.fitzsci.ie info@fitzsci.ie email



# **CERTIFICATE OF ANALYSIS**

# **Test Parameter**

**Total Organic Carbon** 

**Analytical Technique SOP** Conseit of Contribution of the division of the and direct use. TOC analyser (NPOC) 316

**Result** 4.85

Acc. **Units**  $mg/L$ 

Signed :  $A$ mens

 $Date: 22||2||1$ 

Aoife Harmon - Technical Supervisor Acc.: Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C Results shall not be reproduced, except in full, without the approval of Fitz Scientific Results contained in this report relate only to the samples tested \*\*The analytical result for this parameter may not be reflective of the concentration present at the time of sampling. The maximum recommended preservation time for this parameter has been exceeded. Page 1 of 1

Appendix 11.2

Consent of copyright owner required for any other use.





# Summary Wizard of "CRITICAL"(Rank 1 by Max Level) Results for Design Storms







# Summary Wizard of "CRITICAL"(Rank 1 by Max Level) Results for Design Storms





Consent of copyright of the purposes only. and other use.






©1982-2008 Micro Drainage



©1982-2008 Micro Drainage



14.000 S7.06a 30.600 29.175 1.200 30.530 28.975 1.330 1200

9.008 S7.06 30.530 28.105 1.975 30.510 28.045 2.015 1350

1.009 S1.08 30.510 27.850 2.060 29.500 27.830 1.070 1500 1.010 S1.09 29.500 27.730 1.170 29.500 27.705 1.195 1500 1.011 S1.10 29.500 27.705 1.195 29.500 27.675 1.225 1500 1.012 S1.10a 29.500 27.675 1.225 29.500 27.600 1.300 1500 1.013 S1.11 29.500 27.600 1.600 30.151 29.600 0.251 5 1500 1.014 S1.12 30.151 29.550 0.301 30.200 29.500 0.400 1500

Project Management Group<br>
Killakee House Page 6<br>
Rillakee House Page 1 Killakee House Indaver I<br>Belgard Square Phase 2 **Belgard Square** Tallaght Dublin 24 Date 21 February 2012 15:39 | Designed By WH File PHASE 2 5YR.SUM Checked By Micro Drainage Simulation W.11.3



## PIPELINE SCHEDULES

## Upstream Manhole





Project Management Group<br>
Killakee House Page 7<br>
Rillakee House Page 7 Killakee House Indaver I<br>Belgard Square Phase 2 **Belgard Square** Tallaght Dublin 24 Date 21 February 2012 15:39 | Designed By WH File PHASE 2 5YR.SUM Checked By Micro Drainage Simulation W.11.3



## PIPELINE SCHEDULES

RRO

Ľ  $\mathbf{0}$  EG

 $\sum_{n=1}^{\infty}$ 

ſ

 $\mathsf{D}$ 

## Upstream Manhole





Project Management Group<br>
Killakee House Page 8<br>
Rillakee House Page 8 Killakee House Indaver I<br>Belgard Square Phase 2 **Belgard Square** Tallaght Dublin 24 Date 21 February 2012 15:39 | Designed By WH File PHASE 2 5YR.SUM Checked By Micro Drainage Simulation W.11.3



## PIPELINE SCHEDULES

## Upstream Manhole











#### Summary Wizard of "CRITICAL"(Rank 1 by Max Level) Results for Design Storms







#### Summary Wizard of "CRITICAL"(Rank 1 by Max Level) Results for Design Storms





Consent of copyright of the purposes only. and other use.





©1982-2008 Micro Drainage



14.000 S7.06a 30.600 29.175 1.200 30.530 28.975 1.330 1200

9.008 S7.06 30.530 28.105 1.975 30.510 28.045 2.015 1350 1.009 S1.08 30.510 27.850 2.060 29.500 27.830 1.070 1500 1.010 S1.09 29.500 27.730 1.170 29.500 27.705 1.195 1500 1.011 S1.10 29.500 27.705 1.195 29.500 27.675 1.225 1500 1.012 S1.10a 29.500 27.675 1.225 29.500 27.600 1.300 1500 1.013 S1.11 29.500 27.600 1.600 30.151 29.600 0.251 5 1500 1.014 S1.12 30.151 29.550 0.301 30.200 29.500 0.400 1500

Project Management Group<br>
Killakee House Page 4<br>
Rillakee House Page 4 Killakee House Indaver I<br>Belgard Square Phase 2 **Belgard Square** Tallaght Dublin 24 Date 21 February 2012 10:03 | Designed By WH File PHASE 2 5YR.SUM Checked By Micro Drainage Simulation W.11.3



## PIPELINE SCHEDULES

## Upstream Manhole





Project Management Group<br>
Killakee House Page 5<br>
Rillakee House Killakee House Indaver I<br>Belgard Square Phase 2 **Belgard Square** Tallaght Dublin 24 Date 21 February 2012 10:03 | Designed By WH File PHASE 2 5YR.SUM Checked By Micro Drainage Simulation W.11.3



## PIPELINE SCHEDULES

## Upstream Manhole





Project Management Group<br>
Killakee House Page 6<br>
Rillakee House Page 1 Killakee House Indaver I<br>Belgard Square Phase 2 **Belgard Square** Tallaght Dublin 24 Date 21 February 2012 10:03 | Designed By WH File PHASE 2 5YR.SUM Checked By Micro Drainage Simulation W.11.3

## PIPELINE SCHEDULES

 $\bigcap$ 

ſ

 $\mathsf{D}%$ 

RRO

Ь

nac

 $\left( \begin{matrix} 1 \\ 0 \end{matrix} \right)$ 

## Upstream Manhole











#### Summary Wizard of "CRITICAL"(Rank 1 by Max Level) Results for Design Storms







Results for Design Storms





Consent of copyright of the purposes only. and other use.

©1982-2008 Micro Drainage

Appendix 11.3

Consent of copyright owner required for any other use.



# **Indaver Meath Waste-to-Energy Facility**

# **FIRE WATER RISK MANAGEMENT PROGRAMME RISK MANAGEMENT For inspection condition 3.7 of vertical for any other required for any other required for any other required for any other required for any other requirements.**

(Prepared in Compliance with Condition 3.7 of Waste Licence

Register No. W 0167-02)

Document No.: 462X003 Rev 1 FBS: 07.02.02 Date: July 2011

**Byrne Ó Cléirigh Ltd.**, 30a Westland Square, Pearse Street, Dublin 2, Ireland. Telephone: + **353 (0)1 6770733**. Facsimile: + **353 (0)1 6770729**. Web: **www.boc.ie** Registered in Dublin, Ireland No. 237982.

*This report has been prepared by Byrne Ó Cléirigh Limited with all reasonable skill, care and diligence within the terms of the Contract with the Client, incorporating our Terms and Conditions and taking account of the resources devoted to it by agreement with the Client.* 

*We disclaim any responsibility to the Client and others in respect of any matters outside the scope of the above.* 

*This report is confidential to the Client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies upon the report at their own risk.* 

Consent of copyright of the purposes only. and other use.

# **TABLE OF CONTENTS**



# **1 INTRODUCTION**

At the request of Indaver Ireland, this report sets the Firewater Risk Management Programme for the Meath Waste-to-Energy (WtE) facility at Carranstown, Duleek, Co. Meath, which was prepared in accordance with Indaver's Waste Licence (Reg. No. W0167-02). Condition 3.7 of the Licence states the following:

*3.7.1 - The licensee shall, to the satisfaction of the Agency, establish and maintain a suitable firewater risk management programme. The risk management programme shall be fully implemented in advance of acceptance of waste at the facility.* 

*3.7.2 - In the event of a fire or spillage to storm water, the site storm water shall be diverted to suitable containment. The licensee shall have regard to any guidelines issued by the Agency with regard to firewater retention.*

This report builds on Indaver's Fire Water Risk Assessment Report – Ref: PMG-MEATH-HSE-REP-000-1505 and the site's Emergency Response Procedure (ERP).

# **2 SITE DESCRIPTION**

The Meath WtE Facility is situated on the R $\frac{152}{3}$  Drogheda to Duleek road and is located in the townland of Carranstown, approximately 3 km north east of Duleek in Co. Meath. The facility consists of a 70 Megawatt (MW) WtE plant for the acceptance of up to  $200,000$  tonnes per annum (tpa) of household, commercial and industrial non-hazardous waste. situated on the R152 Dre<br>Carranstown, approxima<br>msists of a 70 Megawatt<br>00 tonnes persannum (tpa)<br>vaste.<br>experience of the facility<br>truction works, the facility **Consent of copyright of any other regular** 

On completion of the construction works, the facility will comprise of the following main elements main elements:

- The main process building (comprising of tipping hall, waste bunker, furnace boiler, steam turbine, flue gas treatment and ash storage)
- An air cooled condensers building
- A contractors' compound / building with workshop
- A transformer compound and ESB substation with emergency generator
- A security building with weighbridge at facility entrance
- A water storage tank and pump house
- A surface water attenuation pond and fire water retention tank

When waste treatment operations commence, waste will be transported to the site on a daily basis by waste contractors. On entering the site, waste contractors will follow a two-way route to the tipping hall where inspections on the waste will be conducted by Indaver on a routine basis. In the tipping hall, waste will be deposited into the waste bunker where it will be mixed by the grab before being placed in the hopper that feeds the furnace. In the furnace, the waste will be incinerated at temperatures in excess of 850ºC. The ash collected from the bottom of the furnace will pass through a wet bath before being stored for collection and removal from the site. The combustion gases from the incineration process will pass through a number of treatment stages. These

include two stages of dosing (lime milk and lime) for acid removal and two stages of dosing (expanded clay and activated carbon) for dioxin removal, before passing through filter bags and being discharged to atmosphere via the stack. The emissions to air will be monitored continuously and the results will be fed back to the control room for the facility where the levels of dosing can be adjusted accordingly.

The fire scenarios that are included in this programme were identified on the basis of the potentially hazardous materials and/or operating conditions at the site.

# *2.1 Hazards*

The facility will be used for the treatment of household, commercial and nonhazardous industrial waste, sewage sludges and industrial sludges. Although they are not classed as hazardous, there is a potential fire risk due to the combustible nature of the waste stream. However this risk is mitigated to some extent as the waste has a high moisture content and a slow natural burn rate. Further risk mitigation is provided by good operating practices and by the provision of fire fighting equipment at the site.

The wastes do not fit into any of the categories of potentially environmentally damaging materials identified in the EPA's guidance document on the storage and transfer of materials for scheduled activities<sup>1</sup>. Exercise in the EPA's guidance documented<br>the duled activities<sup>1</sup>.<br>ed in the list of Prigrity Substance<br>Directive (2000/60/6C);<br>d as Dangerous for the Environme<br>any of the Costlocological propertie<br>is a conserved for Germ

- They are not included in the list of Priority Substances established under the Water Framework Directive (2000/60/EC); For instance in the list of Prigrity<br>Directive (2000/60/50);<br>d as Dangerous for the E<br>t any of the Coxicological<br>t;<br>fied under the German W<br>m).
- They are not classed as Dangerous for the Environment;
- They do not exhibit any of the toxicological properties identified in the guidance document;
- They are not classified under the German WGK system (water hazard classification system).  $\phi^{\circ}$

However, as the EPA's guidance document notes, substances may exhibit low toxicity or be non-hazardous to waters yet elicit a pollution response due to their Biological Oxygen Demand (BOD). As such, Indaver provided firewater retention facilities in order to protect against any potential damage from contaminated run-off.

Other hazards considered as part of this study include the potential sources of fires involving combustible materials stored on site and other materials which may adversely affect water quality if released in firewater run-off from the site.

# *2.2 Fire Safety Management Systems*

# **2.2.1 Fire Prevention**

The facility has been designed in accordance with internationally recognised health and safety standards, design codes, legislation, good practice and experience. The

 $\overline{a}$ 

<sup>&</sup>lt;sup>1</sup> EPA IPC Guidance Note on Storage and Transfer of Materials for Scheduled Activities (2004)

facility is provided with manual and automatic controls, and there is a comprehensive interlock system in place which can automatically shut down the plant in a safe manner in the event of equipment failure or dangerous situations arising. In addition, the facility will operate a permit-to-work system (including hot work permits) for all maintenance work, which could give rise to the potential for fire and all contractors on site will undergo induction safety training.

# **2.2.2 Fire Detection**

In addition to the controls to reduce the risk of a fire occurring in the first place, Indaver have also installed a fire detection / alarm system throughout the site. The devices on the system include:

- Optical smoke detectors, heat detectors and UV/IR flame detectors located throughout the plant;
- VESDA aspirating smoke detectors in MCC Room cabinets, VSD room, technical galleries and turbine hall;
- CCTV monitoring of key process operations (hopper /bunker);
- Fire alarm break glass units located throughout the plant;
- Local alarms in individual areas and site wide klaxon evacuation alarm;
- Master fire alarm panel located in MCC room and boiler area and a Repeater Panel located in the Control Room. Panel located in the Control Room.

These systems would assist Indaver in developing a rapid response to any fire scenario, which can help to bring a fire  $\mathbf{u}$   $\mathbf{v}$  control more quickly, thereby reducing the quantities of fire fighting water required. **OR INSPECTION** ividual areas and site wide klaxer<br>anel located in MCC room and bo<br>Control Room.<br>Lindaver in developing a rapid res<br>bring a fire under control more quanter required.<br> $\frac{1}{2}$ <br> $\frac{1}{2}$ <br> $\frac{1}{2}$ <br> $\frac{1}{2}$ <br> $\frac{1}{2}$ <br> $\frac{1$ 

# **2.2.3 Fire Protection**

The facility has been designed in accordance with internationally recognised health and safety standards, design codes, legislation, good practice and experience. Fire protection measures include fire doors with a minimum rating of one hour located through the facility and fire walls (locations shown in Figure 1) providing two hour fire protection with the exception of the viewing platform glazing between the Waste Bunker and the Administration Building control room, which will provide one hour protection.

# **2.2.4 Fire Suppression**

Fire suppression is provided by an on-site water storage tank of 2,185  $m<sup>3</sup>$  capacity. This water can be distributed around the site via a 250 mm diameter fire main and hydrant system. Of this capacity,  $1,855 \text{ m}^3$  is set aside for fire fighting purposes, while the remaining volume is provided for process water requirements. However in the event of a fire, the process water requirement will not be needed and so potentially up to 2,185  $\text{m}^3$  could be available for fire-fighting purposes.

The firewater pump house is equipped with three diesel pumps (two duty and one standby), and an electrical jockey pump to maintain the pressure in the line. These pumps can distribute water around the mains at a flow rate of 900 m<sup>3</sup> per hour. For fires inside the process building, the internal fire main has fixed hose reels, water cannons, sprinkler heads and foam deluge systems. For fires in outdoor areas, the external fire main has a network of hydrants.

The mains system delivers firewater to the following systems:

- Fire hydrants and fixed hose reels, located throughout the site;
- Automatic/manual dry and wet sprinkler systems (see Table 1 for more details);
- Automatic/manual foam deluge systems (see Table 1 for more details);
- Four water cannons in the Bunker Area.

A breakdown of the sprinkler systems at the site is provided in Table 1.



## **Table 1: Summary of Sprinkler Systems at Indaver**

\*The sprinkler system at the Variable Speed Drive (VSD) Room is a gaseous suppression system and so there is no firewater implications associated with its use.

Sprinkler systems provide the advantage that they allow water to be applied directly to the fire, allowing extinguishment to be achieved with lower flow rates than would be required using mobile systems, e.g. application from a fire tender. This means that smaller quantities of fire fighting water runoff would be generated for fires in these areas.

Indaver also maintain a stock of AFFF foam in a  $1.5 \text{ m}^3$  foam tank, which feeds the foam deluge system.

For fires in the Bunker Area, there are four cannons in place, each capable of applying water at a rate of 2,500 l/min. In the event of a fire in this area, up to two cannons could be deployed.

For fires in outdoor areas, water would be applied by connecting to the network of hydrants on the external mains.

The layout of these facilities is illustrated in Figure 1.



Figure 1: Indaver Ireland Facility Layout (Firewalls highlighted in red)

# *2.3 Drainage System*

The site's outdoor surface drainage system has been designed in general accordance with Sustainable Drainage Systems (SuDS) principles. The system collects all rainwater from roofs, hardstanding areas, roads etc. and routes it to:

- A Class I bypass petrol interceptor, designed to retain oil/hydrocarbons present in the surface water runoff<sup>:</sup>
- A continuous online monitoring chamber (TOC, pH and conductivity) with diversion valve located between the interceptor and the surface water attenuation pond;
- A surface water attenuation pond with a capacity of  $1,600 \text{ m}^3$ ;
- Another continuous online monitoring chamber (TOC, pH and conductivity), this one on the outfall from the attenuation pond;
- Local surface water drainage network and River Nanny.

The pre-attenuation pond monitoring chamber would divert any contaminated run-off to an underground diverted fire water retention tank with a capacity of  $300 \text{ m}^3$ . Should this tank be filled, the monitoring chamber would go into overflow mode, allowing runoff to pass into the attenuation pond.

The post-attenuation pond monitoring chamber would shut off the discharge pumps from the pond if contamination is detected in the outfall.

In addition, the delivery area for the ammonia solution and diesel storage area drains to a 10,000 litre forecourt separator before joining the surface water drainage system upstream of the petrol interceptor. There is also a diversion valve located before the separator which leads to a  $2.5<sup>m</sup>$  holding tank to be used during filling operations in delivery area which will prevent small spills entering the surface water system. This will be included as part of the written procedure for these filling operations. After filling is successfully completed the diversion valve will remain open to the separator.

The internal surface drainage in the process building all drains to the  $2 \times 50$  m<sup>3</sup> recovery tanks and is discussed in detail in Section 4.2.

# **3 DESCRIPTION OF METHODOLOGY**

# *3.1 Review of Firewater Scenarios*

The first step in the Fire Water Risk Management Programme is to identify the scenarios which can result in large quantities of fire fighting water being generated. The specific fire fighting scenarios are discussed in Section 4.1 of this report, but from a firewater retention viewpoint they can be broken down into the following categories: The main star of the fighting<br>cenarios are discussed in Section 4<br>viewpoint they can be digite for any<br>viewpoint they can be digite<br>digite.<br>Area<br>any order use.<br>MVA Reasformers inside Process<br>ons inside Process Building<br>cat

- Fires in the Bunker Area
- Fires in Turbine Area
- Fires at the three 2MVA Transformers inside Process Building Early and the propose of the contraction of the contraction of the contraction of the purpose of the contraction of the contrac
- Fires in other locations inside Process Building
- Fires in outdoors location

In the first instances, any fire-fighting water would be collected in the Bunker itself, which is designed as a watertight structure, in accordance with BS8007, "Design of Aqueous Liquid Retaining Concrete Structures".

For fires in the Turbine area, any fire-fighting water would be retained within the cellar beneath the turbine which is also designed as a watertight structure, in accordance with BS8007.

For fires at the three 2MVA Transformers, fires would be either allowed to burn down or fought using CO2/powder extinguishers.

For any other fire scenarios inside the Process Building, the fire water run-off would be collected in dedicated Recovery tanks (designed as a watertight structure, in accordance with BS8007), with any overflow leading to the external surface water drainage network.

For fires in outdoor areas, the fire water run-off would be collected in the surface water drainage system.

These drainage / catchment systems are described in more detail in the following section.

# *3.2 Firewater Catchment Systems*

As discussed in Section 2.3, there are arrangements in place to prevent contaminated surface water run-off from being discharged off site. However, for fires inside the process building, there are separate provisions to retain the fire-fighting water, rather than allowing it to run-off to the surface water drains.

The greatest potential for fire at the facility arises within the waste bunker, where localised heating could occur due to decomposition of organic material in the waste. The bunker is water-tight (BS8007) and, up to the level of the tipping hall, it has a capacity of  $c.5,670 \text{ m}^3$ . If a 50% voidage ratio is assumed for the waste, then there would be a retention capacity of 2,835  $\text{m}^3$  within the bunker. This is greater than the total quantity of fire-fighting water available on site, and so for a fire in this area all water would be retained within the bunker, even in the most extreme fire event. All firewater used in the Tipping Hall also drains to the waste bunker.

If a fire occurred in the Turbine area, the fire-fighting water would be collected in the cellar beneath the turbine. The cellar is of water-tight  $\delta$  on struction (BS8007 - Code of practice for design of concrete structures for retaining aqueous liquids), and has the capacity to retain  $c.1,000 \text{ m}^3$  of water. For inspection area, the fire-fighting water<br>The cellar is of water-tight constructed structures for retaining aqueou<br>
m<sup>3</sup> of water.<br>
e in the process building, the firew<br>
anks.<br>  $\cos \theta$  is building, the fire-figure requir

If a fire occurred elsewhere in the process building, the firewater run-off would drain to the  $2 \times 50$  m<sup>3</sup> recovery tanks.

For any scenarios outside of the process building, the fire-fighting water would be collected in the surface water drainage system, which incorporates a  $300 \text{ m}^3$  diverted fire water retention tank (designed as a watertight structure, in accordance with BS8007) and a  $1,600 \text{ m}^3$  surface water attenuation pond (described in Section 2.4). In addition, there is additional storage provided for runoff from the diesel delivery area with the forecourt separator providing up to  $10 \text{ m}^3$  of additional storage.

# *3.3 Environmental Receptors*

The main environmental receptor for firewater run-off from the site would be the River Nanny.

An ecological survey, carried out as part of the EIS, found that no parts of the site or in the immediate surroundings are covered by a scientific or conservation designation or proposed designation as recognised by the National Parks and Wildlife Service (NPWS). The survey identified that there were four such designated sites within approximately 5 km of the site and these are listed below:

- Duleek Commons (pNHA)
- Thomastown Bog
- Boyne River Island

• Dowth Wetland

These are described in more detail in the EIS. None of these areas would be exposed to any risk due to firewater run-off from the site. However, the EIS also noted that the River Nanny reaches the Irish Sea at Laytown, where the estuary is a pNHA and a pSAC (site code: 000554, Laytown Dunes / Nanny Estuary). However, as the site is at a distance of c.10 km from the coast, if any firewater did enter the river, any contamination would be diluted to insignificant levels long before it reached the estuary.

Another potential receptor for contaminated firewater run-off would be groundwater. The limestones found beneath the site are part of the Platin Formation which has been classified by the GSI as a regionally important, diffuse karst aquifer with good development potential. The GSI/EPA/DoEHLG Groundwater Protection Scheme Classification ranks the site as having a moderate vulnerability due to the thickness and type of overburden cover present at the site. However there are no pathways by which contaminated firewater would enter the groundwater. Any fire-fighting water applied inside the process area would be retained there, while any fire-fighting water applied outdoors would be collected and retained in the surface water drainage system.

Consent of copyright of the purposes only. and other use.

# **4 RISK MANAGEMENT PROGRAMME**

## *4.1 Fire Scenarios*

The fire scenarios identified during the risk assessment conducted by Indaver are summarised in Table 2. For reference, we include details of the environmental fate of any firewater applied in these scenarios.





# *4.2 Fire Fighting & Fire Water Retention Systems*

## **4.2.1 Fire in Bunker Area (including Tipping Hall)**

For a fire within the main bunker, water would be applied using  $2 \times 2,500$  l/min water cannons. A typical fire-fighting scenario would involve application of water for 10 – 30 mins, however it is conservatively assumed that each scenario could potentially last for up to 2 hours. With a total available fire-fighting water stock of between 1,855  $\text{m}^3$  and 2,185  $\text{m}^3$ , there is the capacity to continue fire-fighting beyond this time, and water could be applied to the bunker for c.6 hours in an extreme case. Even if the full inventory of water available on site was applied to combat a fire in this area, the bunker would have the capacity to store 2,835  $\overline{m}^3$  of water even if it was full of

waste, which means that it has more than sufficient capacity to retain the full volume of water that could be applied in any scenario.

Part of the bunker area is also protected by fixed sprinkler systems, as shown in Table 1. In these cases the water application rate would be comparable to or less than the amount of water that would be applied using the water cannons. Again, even if all the water on site was applied to the bunker as part of the emergency response, there would be sufficient capacity in the Bunker to retain it all.

# **4.2.2 Fire in Turbine Area**

The fire-fighting measures in the Turbine Area are provided by fixed sprinkler systems, as described in Table 1. There are two such systems, one to apply water at the Turbine Hall (which covers the turbine bearing, valves, flanges etc.), and one to apply water to equipment in the Turbine Cellar (including the lube oil tank and pipe rack).

Based on the figures in Table 1, the Turbine Hall sprinkler system would apply water at a flow rate of 560 litres per minute, while the Turbine Cellar sprinkler system would apply foam at a flow rate of 984 litres per minute.

For a conservative fire fighting scenario of 2 hours  $(a^2)$  typical fire-fighting scenario is estimated to only last 30mins, as explained above), this means that a total volume of up to 67 m<sup>3</sup> of water would be applied using the Turbine Hall sprinkler system, which is significantly less than the capacity of the  $\widetilde{C}$ ellar. Even if the fire was to continue beyond this duration, it would take  $c,30$  hours of continuous water application using these sprinklers to fill the Cellar to capacity. As such it is not credible that these sprinklers would be deployed for  $t$   $\hat{H}$ <sup>S</sup> length of time. As such there is no run-off risk association with these scenarios. The institution of 2 hours)<br>
ins, as explained above),<br>
ins, as explained above),<br>
if the applied using the Tu<br>
e capacity of the Cellar.<br>
uld take c 30 hours of co<br>
Cellar to capacity. As sue<br>
ved for this length of time<br> The consent of 2 hours (a typical<br>ting scenario of 2 hours (a typical<br>ns, as explained above), this mean<br>the applied using the Turbine Hal<br>e capacity of the Cellar. Even if the<br>uld take c 30 hours of continuous<br>cellar to

The sprinkler system in the Turbine cellar is a foam-based system. AFFF foam is stored in a  $1.5 \text{ m}^3$  tank to supply foam to the deluge system. This foam is mixed with water in a ratio of 97:3 to give a 3% foam solution. This means that a stock of 1.5  $m<sup>3</sup>$ of foam can be used to generate up to  $48.5 \text{ m}^3$  of foam/water solution. AFFF is categorised as a Low-Expansion foam and has an expansion ratio of less than 20:1. This means that the maximum volume of expanded foam solution that could be applied within the cellar is less than  $970 \text{ m}^3$ , assuming that the full inventory of foam was applied in this area. This volume is less than the capacity of the cellar and so there would be no firewater or foam run-off from this scenario.

# **4.2.3 Fire at the 2MVA Transformers**

There are three 2MVA transformers located adjacent to the Flue Gas Cleaning area (as shown in Figure 1). These transformers are each partitioned from the Flue Gas Cleaning area and from each other by 2-hour fire walls. Each transformer contains 635 kg of transformer oil (PCB free) and is separately bunded. The transformer oil is combustible but is isolated from ignition sources by proven design. In the event of a fire in a transformer the Control Room will initiate electrical disconnection/isolation of transformer and a decision will be made on whether to tackle the fire or allow fire

to burn out. CO2 and powder fire extinguishers in the area can be used to fight the fire so there would be no firewater or foam run-off from this scenario.

# **4.2.4 Fire in Flue Gas Cleaning Area and Other Process Areas**

For fires in the flue gas cleaning area and other process areas, the fire-fighting water would be applied by the fixed sprinkler systems, described in Table 1. The water would then be collected in the  $2 \times 50$  m<sup>3</sup> recovery tanks.

The two Recovery tanks have a total combined capacity of  $100 \text{ m}^3$ . Water from floor washing *etc.* will also drain to these tanks, but Indaver will ensure that the water level in these tanks is kept to a minimal level. At all times one tank will be empty, and the other will be filled to no more than 25% capacity. This means that in the event of a fire in this area the actual available capacity in these tanks will be at least  $87.5 \text{ m}^3$ . If a major scenario occurred which resulted in greater quantities of water being applied than could be retained in these tanks, then any overflow would be directed to the surface water drainage system where it can be contained.

## **4.2.5 Fire Outside the Main Process Building Area (including the Contractors Compound)**

A fire in the contractors compound, 38kV compound  $\&$  generator, diesel storage area or other outdoor areas, would be fought using hose reels and hydrants connected to the outdoor firewater ring main and, potentially, local fire brigade equipment. There will also be fire fighting equipment, such a hand held fire extinguishers, located in the contractors building. and be fought using hose.<br>
main and, potentially. Not<br>
unipment, such as hand ho<br>
with a second begin on<br>
the passes through a Classical dividends<br>
on hardstanding areas on<br>
hich passes through a Classical dividends mpound, 38kV compound  $\&$  genes<br>
lid be fought using hose reeds and<br>
main and, potentially, yocal fire bri<br>
uipment, such as hand held fire ex<br>
m hardstanding areas on the site v<br>
inch passes through a Class 1 by-p<br>
10 ye

All fire water generated from hardstanding areas on the site will be collected in the surface drainage system which passes through a Class 1 by-pass petrol interceptor (designed for a min. 1 in 100 year storm) before entering the surface water attenuation pond or, in the case of an emergency, the firewater retention tank. The monitoring points in the surface water drainage system are located after the petrol interceptor and at the outfall pump sump from the site where runoff is released to the hydrobrake leading to the drainage ditch beside the site. The monitoring points are automated and monitor Total Organic Carbon (TOC), conductivity and pH in the surface water.

If, after passing through the petrol interceptor, the surface water TOC is outside the set parameters, the diversion valve will close and redirect the surface water runoff to the firewater retention tank where it can be stored and tested for reuse in the flue gas cleaning process or removed from site for treatment or disposal by an appropriately licensed facility. The outfall pump for delivering the water from the surface water attenuation pond to the drainage ditch can also be de-activated remotely from the control room if the fire alarm is triggered.

The firewater retention tank has a capacity of  $300 \text{ m}^3$ . Should the capacity of this tank be reached, the system will automatically overflow to the surface water attenuation pond (capacity of  $1,600 \text{ m}^3$ ) and can be contained there until testing on the water quality has been carried out. Meath County Council and the EPA were consulted on the proposed design of the continuous monitoring and discharge system as part of the planning and licensing process for the site.
The drainage channel in the ammonia solution and diesel tank delivery area runs to a 10,000 litre forecourt separator where spills can be contained. When the capacity of the separator is reached, the flow will enter the surface water drainage system upstream of the petrol interceptor. As previously described, the  $2.5\text{m}^3$  holding tank will only be utilised during filling operations at the tanks.

Another potential fire scenario could arise in the event of a grassland fire in the surrounding area. In this case the response at Indaver would be to assess the scale of the fire and, if necessary, apply protective cooling water to items of plant or equipment judged to be in danger of overheating. In this case there is no contamination issue associated with the water used, as there is no loss of containment event on site. Even so any cooling water applied in this scenario would still be retained in the site drainage system.

# *4.3 Risk Assessment*

## **4.3.1 Fires inside Process Buildings**

Based on this analysis, many of the fire scenarios identified present no inherent environmental risk from firewater run-off. For any fires in the bunker area or in the turbine area, the capacity within the building would be more than sufficient to retain all fire-fighting water that could be applied. For scenarios in other locations inside the process building, any fire-fighting water would be collected in the Recovery tanks provided. If the Recovery tanks reach their capacity, the firewater will enter the surface water drainage network, where it will be contained (see section 4.3.2). **SOCUTE:** The interaction purposes only of the fire scenarios independent of contained the applied of For scenarios in fighting water would be collected tanks reach their capacity, the fire work, where it will be containe

# **4.3.2 Fires at Outdoor Locations**

For fires at outdoor locations, the capacity of the drainage system is more than sufficient to accommodate the volumes of water that would be applied and so there would be no environmental risk due to run-off from these fire scenarios under normal conditions.

However, the EPA guidance document on firewater retention advises that consideration should also be given to the amount of rainfall that could be collected in the retention system. This is not applicable for the scenarios in which the firewater would be retained within the building (in the Bunker, Cellar or Recovery Tanks), but it is relevant for those scenarios where the surface water drainage system is required to provide retention. The EPA's guidance on this matter is to allow for 50 mm rainfall or, if the figure is significantly different, to allow for the 20-year, 24-hour rainfall event.

We note that the surface water drainage and firewater retention system is not designed to the EPA's guidance but is instead designed using the German LÖRÜRL methodology. The methodology is based on the practical experience of German fire

fighting authorities, technical universities, industry federations and the insurance industry. Under this methodology, the system is designed to retain water from a 2 hour fire event, plus rainwater from a 1-in-20 year storm for a total of four hours. The LÖRÜRL methodology considers that a large storm occurring simultaneously with a fire is an unrealistic scenario and so the approach used is that the storm could occur for the duration of the fire plus another two hours afterwards.

This means that in the highly unlikely event of a major fire scenario in an outdoor area, combined with a major rainfall event, a situation could arise in which the retention capacity of the site would not be sufficient for all of the water being collected in it. However, it should also be noted that in addition to the remote probability of such a combined event, this scenario would also have reduced environmental impact, due to the high level of dilution that would be provided by the high levels of rainfall to the site and to the surrounding catchment area.

There are no stormwater implications associated with the scenario involving a grassland fire off-site. The circumstances for grassland or forest fires to occur involve a period of dry weather so that the grass becomes dried out. It is not considered credible therefore that an external grassland fire could occur simultaneous with a major rainfall event.

# *4.4 Programme*

According to the EPA guidelines, the risk **management** programme should outline actions to be taken to reduce the risk associated with contaminated firewater run-off (this may include the construction of a firewater retention facility, depending on the level of pollution risk). For the risk **proposes only.**<br>
The risk proposes only.<br>
The risk associated with contament programs of a firewater retention factors<br>
guidance includes a number of reception and programme. Table 3 shows how

Appendix C of the EPA's guidance includes a number of recommendations for a firewater risk management programme. Table 3 shows how these elements have been covered by the arrangements at Indaver.







#### **4.4.1 Indoor Scenarios**

Indaver have provided firewater retention facilities at the site. For any fire inside the process area, water and/or foam would be applied as required, as set out in the Emergency Response Procedures for the facility. In addition, the valve on the effluent outfall from the site would be closed on activation of a fire alarm. water retention facilities<br>foam would be applied a<br>edures for the facility. In<br>be closed on activation c<br>plied in these areas would<br>ecovery. Fanks. As such<br>te the potential pollution

Any fire-fighting water applied in the seas would be retained on-site in the Bunker, the Turbine Cellar or the Recovery Tanks. As such the engineering controls are already in place to eliminate the potential pollution hazards associated with these scenarios. scenarios. water retention facilities) at the site<br>foam would be applied as required<br>edures for the facility. In addition<br>be closed on  $\frac{\partial f}{\partial x}$  is a addition<br>of a fire any<br>other use. As such the engine the potential pollution ha

In order to ensure the continued effectiveness of the retention facilities in these areas, Indaver will conduct periodic inspections of these systems. All maintenance will be performed in accordance with the recommendations of the manufacturer or supplier of the equipment. This will be recorded and documented in the SAP system that is in place at the site.

The only response measures after the event would be to assess the retained firewater for contamination to determine whether it could be disposed of as effluent or whether it should be collected for removal off site by a licensed undertaker. Any decision of this type would be made in consultation with the EPA.

## **4.4.2 Outdoor Scenarios**

Indaver have also provided firewater retention facilities for fires at outdoor areas of the site. In this case the facilities have enough capacity to deal with any fire-fighting scenario. They do not have sufficient capacity to meet the EPA guidelines for storm water during a fire scenario, as they are designed using the German LÖRÜRL

methodology. As such, the risk management programme includes a number of steps to further reduce the risk to the environment from a fire in these areas.

#### Fire in Contractors Compound

This scenario involves a fire in the contractors' compound. In this case any firefighting water applied would be collected in the general surface water drainage system, described earlier. The valve on the effluent discharge outlet from the site would be closed as part of the response procedure in order to ensure that any firefighting water would be retained on site.

The capacity of the retention systems would be sufficient to accommodate the firefighting water that would be applied in this scenario according to the German LÖRÜRL methodology, but it would not be sufficient to provide capacity for the 24 hour 20-year storm water event from the EPA's guidance document. This is because the fire-fighting water would enter the same drainage system as the surface water falling across the entire site.

However, this scenario does not present a significant environmental risk due to the lack of potential for contamination in the run-off and also the degree of additional dilution that would be provided if this quantity of rainfall occurred. Also, all surface runoff passes through the petrol interceptor before entering the surface water attenuation pond. The contractors' compound area is not used for storing any significant quantities of dangerous substances, and so the environmental hazards associated with a fire here are similar to those at any typical commercial or office building. Furthermore, the circumstances of any scenario which would result in the capacity of the retention facilities being exceeded (i.e. a fire in an outdoor area simultaneous with a major rainfall event), would also result in a large dilution factor as large volumes of rainwater run-off, from the site and from the greater catchment area surrounding it, would enter the river at the same time. tractors' compound area<br>
ingerous substances, and<br>
are similar to those at any<br>
executive purposes of any sc<br>
cilities being exceeded (i<br>
rainfall exert), would als<br>
ter run-off, from the site<br>
enters the river at the sam ided if this quantity of rainfall over<br>etrol interceptor before entering the<br>tractors' compound area is not use<br>ngerous substances and so the environment of the sense of any typical<br>circumstances of any scenario whill<br>dif

If a situation arose in which a fire occurred in an outdoor area at the same time as a major storm event, Indaver would monitor the water levels in the retention lagoon to ensure that it did not overflow. If the levels in the pond approach overflow levels, then some of the water would be required to be discharged off site in a controlled manner. As mentioned already, the system is designed to an internationally recognised standard and has more than sufficient capacity for fire-fighting water. If a scenario arose in which a fire in an outdoor area coincided with a major rainfall event, only the excess water volumes would be discharged off-site in this manner and so the bulk of the water would still be retained on-site. By its very nature, the large volumes of rainfall involved in this scenario would also provide a great deal of dilution to the firewater run-off. Furthermore, as discussed previously, the run-off from a fire of this type presents a low environmental hazard in the first place.

#### Fire at the ammonia solution/diesel tank unloading area

This scenario involves a release of Diesel fuel, which is classed as Dangerous for the Environment. This material is not classed as Flammable, and has a flash point of 66°C which is well above ambient temperatures, and so this scenario presents a very

low fire risk. The ammonia solution used is non-flammable under ambient temperature and pressure conditions.

In the event of a fire in this area some ammonia gas fumes may be released due to an increase in ambient temperatures in the area and thermal radiation to the ammonia tank. Ammonia gas is only explosive over a very narrow concentration range (16- 23% in air), and due to the fact that it is stored on site as a dilute solution (25% in water) it would not be credible that the necessary airborne concentrations could be reached. Furthermore as the ammonia solution tank is stored in an external area, any vapour formed would rapidly disperse to atmosphere, further reducing the potential for any build up of vapour, even if the tank were to be fully engulfed in a fire. The double-skinned ammonia and diesel tanks are also located in an external area away from facility processes and potential ignition sources.

During normal operations, storm water run-off from this area would be routed through the separator before joining the main surface water drainage system. However, when a delivery of fuel/ammonia solution is made, standard operating procedure is that the valve on the local drainage system will be closed and so that any spills would be routed to a 2.5  $m^3$  capacity underground holding tank. This tank is of sufficient capacity to retain a typical spill scenario in this area (e.g. leak from a transfer hose).

Fuel transfer operations will be continuously manned and monitored in order to allow a quick response to be put in place if a loss of containment did arise. In the event of a larger release scenario (e.g. damage to the road tanker resulting in a full compartment comprising  $c.6 \text{ m}^3$  of fuel leaking), any excess material will enter the local drainage system and be retained in the underground separator tank. These measures ensure that any spill scenario (and also any fire scenario) in this area would not impact the surface water drainage at the site. in place if a loss of containty.<br>  $\therefore$  damage to the road tank<br>
eaking), any excessionate<br>
the underground separator<br>  $\therefore$  any fire seematio) in this<br>  $\therefore$  any fire seematio) in this Example the continuously manned and more in place if a loss of containment d<br>
damage to the road tanker resultively.<br>
Eaking), any excess material will be underground separator tank. The any fire seemant<br>
on this area wor

#### Fire at the 38kV compound  $&$  generator

This scenario involves a fire at the 38 kV compound or the generator, leading to a release of transformer oil or diesel with firewater, which are both classed as Dangerous for the Environment. These materials are not classed as Flammable so this scenario presents a very low fire risk.

In this case any fire-fighting water applied would be collected and retained in the bunding and the general surface water drainage system, described above in 'Fire in Contractors Compound'.

## **4.4.3 Arrangements for Disposal of Firewater Run-off**

After a fire event, the safe disposal of firewater from the site will include testing of water retained in the fire water retention tank and the surface water retention pond to see if it can be released safely, with the agreement of the Agency. If not, then arrangements are in place for it to be disposed of by other means (e.g. treatment in situ, if practicable, or arranging for a third-party to remove it).

If water must be removed for treatment at an offsite facility the waste water will be classified by the technical department in accordance with operations procedure 4.2 Classification and Identification of Waste. Once the EWC has been assigned a suitable facility will be chosen to send the waste to and Indaver have a list of potential vendors who can accept these wastes. Only approved vendors under the internal vendor control procedure will be used.

# **5 CONCLUSIONS**

Indaver's Meath Waste-to-Energy (WtE) facility at Carranstown, Duleek, Co. Meath, has been designed in accordance with internationally recognised health and safety standards, design codes, legislation, good practice and experience. The facility is provided with manual and automatic controls, and there is a comprehensive interlock system in place which can automatically shut down the plant in a safe manner in the event of equipment failure or dangerous situations arising. In addition, the facility will operate a permit-to-work system (including hot work permits) for all maintenance work, which could give rise to the potential for fire and all contractors on site will undergo induction safety training.

The firewater risk management programme for the site covers all the major fire scenarios identified for the site and the runoffs generated by the fire fighting responses including any releases of materials to the drainage systems that may be hazardous to the environment. The programme includes retention facilities, spill containment facilities and equipment, best practice process design, operational controls and procedures, fire fighting systems and other fire fighting equipment. These are described in details in each of the relevant sections. site and the runoffs generals<br>leases of materials to the<br>ent. The programme incleaning incleaning the<br>equipment, best practice<br>re fighting systems and only<br>also in each of the relevan ment programme for the site cover<br>site and the runoffs generated by<br>eases of materials to the drainage<br>ent. The programme includes rete<br>equipment, best practice process d<br>re fighting systems and other fire is<br>is in each of

The surface water drainage and firewater retention system is not designed to fully meet the EPA's guidance but is instead designed using the German LÖRÜRL methodology. This methodology is based on the practical experience of German fire fighting authorities, technical universities, industry federations and the insurance industry. The methodology does not meet the retention volumes required for the worst case 24 hour rainfall scenario given in the EPA's guidance. However, this does not present a significant environmental risk to offsite receptors due to the lack of potential for contamination in the run-off for the scenarios affected and also the degree of additional dilution that would be provided if this quantity of rainfall occurred.

This firewater risk management programme will be reviewed on a regular basis and, where necessary, updated as part of the Annual Environmental Report.