

Recd EL 13/2/2013.

20606-03



Ms. Eimear O' Keffe
Office of Environmental Enforcement
Environmental Protection Agency,
EPA Headquarters
PO Box 3000
Johnstown Castle Estate,
County Wexford

Date: 04/02/2013

Our Ref: 2013-SSEGI-03

Dear Ms. O'Keffe,

I refer to our meeting on January 24th, 2013 at your offices in Johnstown Castle, where we discussed flow rates from SW2 – Condenser Cooling Water for the Combined Cycle Gas Turbine. Under schedule B.2 of the current Great Island IPPC licence, the maximum flow rate per day permitted is stated as 600,000m³ on commencement of commercial operation of the CCGT whilst the maximum hourly rate is 33,000m³.

As stated in the EPA Report on the assessment for Technical Amendment; at the Proposed Determination stage we objected to the hourly limit of 25,000m³ (extrapolated to 24 hour = 600,000m³), and requested that the hourly rate be increased to 33,000m³ (extrapolated to 24 hour = 792,000m³). The final design of the proposed development enabled us to reduce the temperature of the emitted water through plant optimisation. This optimisation process involved increasing the volume of cooling water through the condenser thereby reducing the thermal load on the estuary. The Agency agreed to change the hourly rate from 25,000m³ to 33,000m³.

Within the objection letter to the Proposed Determination submitted to the EPA 6th December 2011, we outlined the hourly rate of 33,000m³, and we outlined the maximum rate per day as 792,000m³ on the emissions table attached to the letter. Hence, we disagree with the statement in the technical report on the assessment for technical amendment, that it was not raised in the first party objection to the proposed determination.

It is important to highlight that the daily volume of water emitted from site will be reduced from the current volume of 1,204,080m³ under present operations to 792,000m³. This represents a 34% decrease

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in current volumes (as with hourly flow), and also a 20% reduction in temperature rise from 15°C to 12°C.

As the increase in the hourly rate to 33,000m³ is agreed and the attachment in the letter of objection to the Proposed Determination clearly demonstrates the requested increases in both hourly and daily rates, and considering the above mentioned benefits from the current situation we request that the daily maximum volume to be emitted could be corrected to the 792,000m³, therefore being consistent with the hourly figure presented in the licence.

Should you require any further details, please do not hesitate to contact me at (+353) 0 86 0228844 and/or email melissa.morrissey@ssegeneration.ie.

Yours sincerely,

Melissa Morrissey
SHE Manager - Great Island CCGT

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