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Limerick  
Ireland

Office of Licencing and Resource Use,  
Environmental Protection Agency,  
Johnstown Castle Estate,  
County Wexford.

12-02-2020

Dear Sir or Madam,

**RE: IE Licence P0606-03 SSE Generation Ireland – Amendment to Existing Licence Conditions regarding Emission Points SW7 and SW8.**

SSE wishes to apply for a Technical Amendment to its existing licence as referenced above to permit and approve the continued use of SW8 and reintroduction of SW7. These emission points have always been on the installation licence and through miscommunication during the previous licence review, the licensee was requested to cease emissions on commencement of the CCGT plant.

The clerical amendment requested is to remove the requirement under Schedule B.2 of the licence, page 26, to cease emissions on commencement of the CCGT plant. The current text as outlined in the licence is referenced below:

<b>Emission Point Reference No:</b>	SW7-Engine Room Drains (prior to dilution with surface water) <sup>Note 1</sup>
<b>Name of Receiving Waters:</b>	Barrow Estuary
<b>Location:</b>	26870E, 11450N
<b>Parameter</b>	<b>Emission Limit Value</b>
Mineral Oil	20mg/l

Note 1: On commencement of commercial operation of new CCGT plant discharges from SW7 shall cease.

<b>Emission Point Reference No:</b>	SW8-Cooling Water Screen Wash water <sup>Note 1</sup>
<b>Name of Receiving Waters:</b>	Barrow Estuary
<b>Location:</b>	26861E, 11452N
<b>Volume to be emitted:</b>	Maximum in any one day: 1,970m <sup>3</sup>
<b>Parameter</b>	<b>Emission Limit Value</b>
Chlorine	0.5mg/l

Note 1: On commencement of commercial operation of new CCGT plant discharges from SW8 shall cease.

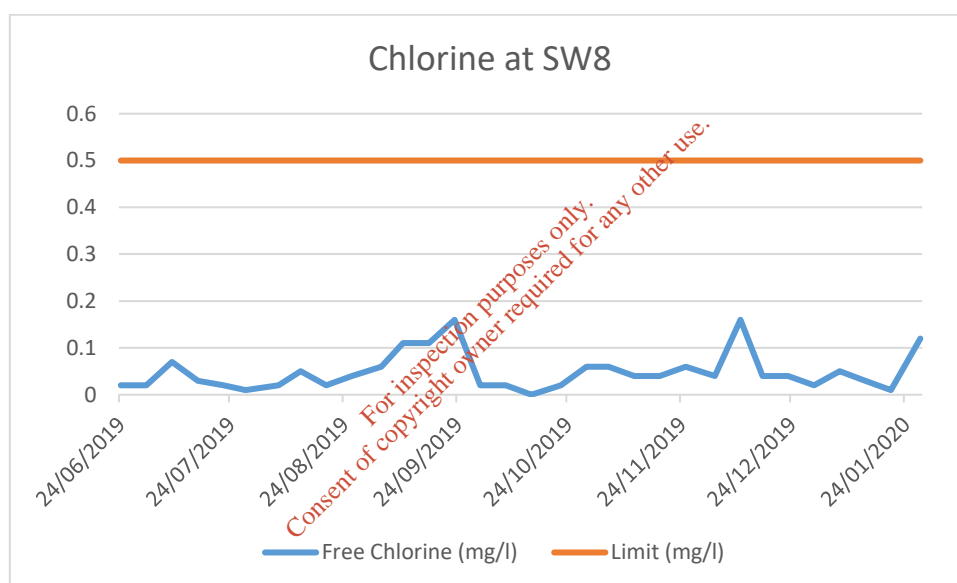
Note 1 requires the installation to cease discharging storm / surface water from SW7 and the cooling water screen wash water from SW8 on commencement of the new CCGT plant.

SW7 was a storm water that collected rainwater from the vicinity of the “engine rooms” prior to discharging to the Barrow Estuary. The engine rooms as listed in the licence relate to historical plant that was in use prior to the CCGT. The engine rooms ceased operation with the old power station and have since been decommissioned. The storm water line, however, is required to discharge rain water from the relative area.

This emission point was given an emission limit value for mineral oils due to its proximity to the “engine room” and potential for mineral oil contamination while the previous power plant was in operation. SW7 would now discharge uncontaminated surface water with no potential for mineral oil contamination.

There appears to have been a misunderstanding between the applicant and the Agency as it was never intended to cease discharging from SW8. This emission point is important to the operation of the facility and there is no alternative discharge route for this water.

SW8 consists of screen wash water from the cooling water intake. Again this discharge point has been included on the licence since the original issue in 2003. There was no intention during the transition from the old generating station to the new CCGT plant to cease discharging wash water from this location. SW8 has been tested as per licence conditions and is consistently compliant with the emission limit values as applied. Water has never ceased discharging from this emission point as there had been no intent, plan or designs included to cease this discharge. There is no alternative route for it to be released. The results of analysis indicate that this emission point is fully compliant in terms of ELVs.



The decision to include Note 1 in the licence was down to misunderstanding between the licensee and Agency during the previous licence review.

Both locations have been licenced since the original IPCL was issued in 2003, and there was no direct intention from the licensee to remove these emissions points.

The Agency noted that there was an amendment to be made to a submission previously made. In a previous application to the Agency, there was an error in data submitted regarding the volumes of sodium hypochlorite used annually on site. Sodium hypochlorite for de-fouling the cooling water system was submitted at 5 tonnes per year, however the actual usage is in the region of 1,300 tonnes per year. This was a clerical error on the application.

SSE have had a Natura Impact Statement complete to determine if the continued use of SW8 would have any impact on the estuary. As SW7 is just storm/surface water, the impact from this line would be negligible. The conclusion of the NIS was that the impact from the continued discharge of chlorinated cooling water will not adversely affect the River Barrow Estuary considering it has been in practice for several decades now with no significant ecological impact been recorded.

In summary, the requested alteration for this technical amendment is to remove the limitation applied by Note 1 on SW7 and SW8 and to update the public files with actual sodium hypochlorite consumption annually at the installation.

If you have any queries, or require any further information on this, please do not hesitate to contact me,



Mark McGarry  
AXIS environmental services

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