

 <p>Environmental Protection Agency An Ghníomhaireacht um Chaomhnú Comhshaoil</p>	<b>OFFICE OF ENVIRONMENTAL SUSTAINABILITY</b>
<b>ENVIRONMENTAL LICENSING PROGRAMME</b>	
<b>TO:</b>	Dr. Eimear Cotter, Director
<b>FROM:</b>	Eoin McCaffrey, Inspector, Environmental Licensing Programme
<b>DATE:</b>	4 June 2020
<b>RE:</b>	Technical Amendment request for Industrial Emissions Licence Register Number: P0606-03, held by SSE Generation Ireland Limited, Red Oak South, South County Business Park, Leopardstown, Dublin 18.

The Agency received a request on 13 February 2020 from SSE Generation Ireland Limited, Licence Reg. No. P0606-03 to technically amend its licence. The amendment request relates to the removal of Note 1 in *Schedule B.2 Emissions to Water* requiring discharges to water at emission points SW-7 and SW-8 to cease.

This memo recommends a refusal of the request.

## 1. Background

The Electricity Supply Board was granted a licence; Reg. No. P0606-01, in 2003 for an installation located at Great Island Generating Station, Campile, New Ross, County Wexford. The installation is licenced under Class 2.1<sup>1</sup> of the First Schedule to the EPA Act 1992 as amended.

The licence has been reviewed on two occasions, the most recent of which, P0606-03 was granted on 16/03/2011 and the licence is now held by SSE Generation Ireland Limited. This review was required for the conversion and upgrade of the installation to operate a 430MW output natural gas fired Combined Cycle Gas Turbine (CCGT) power plant.

Licence Reg. No. P0606-03 has been amended on four occasions, the latest amendment on 31/12/2015 was required to bring the licence into conformance with the EU (Large Combustion Plant) Regulations 2012 (S.I. No. 566 of 2012).

## 2. Technical Amendment request

On the 13 February 2020, the Agency received a request for a Technical Amendment of IE Licence Reg. No. P0606-03, in order to amend *Schedule B.2. Emissions to Water*. The schedule requires discharges to water to cease from emission points SW-7 and SW-8 once the CCGT plant was fully operational at the installation. This requirement is detailed in Note 1 to emission points SW-7 and SW-8 in *Schedule B.2. Emissions to Water* of the licence.

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<sup>1</sup> Combustion of fuels in installations with a total rated thermal input of 50MW or more.

The licensee states that they have not ceased discharging to emission points SW-7 and SW-8 since the CCGT plant has been operational (Q2 2015) and it had never been their intention to do so following the licence review in 2011. The licensee requests that they be allowed to continue discharging from the installation at emission points SW-7 and SW-8. The licensee proposes to amend the requirement to cease discharging at emission points SW-7 and SW-8 by the removing Note 1 in *Schedule B.2 Emission to Water* for both emission points (see Table 1).

**Table 1:** Licence Reg. No. P0606-03, *Schedule B.2. Emissions to Water*

<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>
<b>Mineral Oil</b>	20mg/l
<b>Note 1:</b> On commencement of commercial operation of new CCGT plant discharges from SW7 shall cease.	
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<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>
<b>Chlorine</b>	0.5mg/l
<b>Note 1:</b> On commencement of commercial operation of new CCGT plant discharges from SW8 shall cease.	

### 3. Consultation with the Office of Environmental Enforcement (OEE)

I have consulted with the OEE Inspectors Billy Shanahan and Brendan Kissane, in relation to this technical amendment request. The OEE confirmed that the proposed amendment to Schedule B.2 cannot be accommodated under the existing licence. The OEE has confirmed that there are no legal proceedings in train in respect of this licence. The OEE confirmed they have received a number of complaints in relation to the installation that make specific reference to this technical amendment request in their submission.

### 4. Assessment

The licensee has requested to amend *Schedule B.2. Emissions to Water* and delete Note 1 from emission points SW-7 and SW-8. Note 1 specifies that discharges from that emission point shall cease upon the commencement of the commercial operation of the CCGT plant. The CCGT plant became commercially operational in Q2 2015 and the licensee confirms that that they have not ceased discharging to SW-7 and SW-8 as required and are now requesting to be allowed to continuing discharging at both emission points.

Discharges to SW-7 consist of storm water from a now decommissioned engine room and buildings and an emission limit value (ELV) of 20mg/l for mineral oil was applied at this emission point. Discharges to SW-8 consists of water from the washing of the filter on the cooling water intake screen which is treated with Sodium Hypochlorite to control biological fouling. An ELV of 0.5mg/l for chlorine was therefore applied at this emission point.

The licensee initiated a revision of licence Re. No. P0606-03 on the 10/05/2010. The review proposed to consolidate the discharge of process waste water from the installation from six emission points to three once the CCGT plant was installed and commercially operational. This resulted in process waste water discharges being consolidated to emission points SW2, SW3 and SW13 only, and did not include SW-7 or SW-8. The licence required a reduction in cooling water usage and discharges, and set new emission limits (including a reduction in chlorine and mineral oil) at the consolidated emission points once the CCGT plant was operational. The setting of new emission limits and removal of emission points SW-7 and SW-8 in the licence resulted in a reduction in the mass emissions of chlorine and mineral oil from the installation.

The inspectors report and accompanied Proposed Determination (PD) clearly set out the scope of the review and no first party objections were received by the Agency in relation to Note 1 to *Schedule B.2 Emissions to Water* in relation to the ceasing of discharges at emission points SW7 and SW8, and the FD was issued on 16/03/2011.

The requested amendment to allow the installation to continue discharging at emission points SW-7 and SW-8 is equivalent to a request to operate two new emission points from the installation which were not considered under the existing licence. In relation to SW-7, this would result in an increase in the permitted mass emissions of mineral oil from the installation. In relation to SW-8, this would result in an increase in the permitted mass emissions of chlorine from the installation. These are considered significant changes and cannot be accommodated by way of a technical amendment.

## 5. Recommendation

This memo recommends that the requested changes **cannot** be accommodated by a Technical Amendment of Licence P0606-03 (held by SSE Generation Ireland Limited), in accordance with Section 96 of the EPA Act 1992 as amended.

Signed,



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Eoin McCaffrey  
Inspector  
Environmental Licensing Programme