



Industrial Emissions
Licence Review
August 2020


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Document Sign Off			
Document Number:	1-1 Application Reason		
Reason for Issue:	IE Licence Application Review		
Issue Number:	1	Date:	22-09-2020
Originator:	Signature:	Reviewer:	Customer Contact:
Mark McGarry		Niamh McMahon	Jonathan Storey
Document History:			
Report Revision Number	Revision Date	Section Revised	Reason for Revision

1. Introduction / Organisation

1.1. Reason for Application

SSE Generation Ireland Limited (SSE) is making an application to the Environmental Protection Agency to review its existing licence (P0606-03 as amended by Technical Amendments A to C) for the following items:

- Approve the use of emission point SW8;
- The reintroduction of storm water line SW7;
- Update the licence in line with Commission Implementing Decision (EU) 2017/1442 of 31 July 2017 establishing best available techniques (BAT) conclusions under the Directive 2010/75/EU of the European Parliament and of the Council, for large combustion plants;
- Amend the frequency for testing oils on storm waters in line with EPA / SSE agreement from daily to monthly;
- Include SW11 in the licence.

SW7 and SW8 emission points have always been on the installation licence however were to cease on commencement of the CCGT.

The review was 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:

Figure 1-1: Existing Licence Schedule B.2

Emission Point Reference No: SW7-Engine Room Drains (prior to dilution with surface water)
Name of Receiving Waters: Barrow Estuary
Location: 26870E, 11450N

Parameter:	Emission Limit Value
Mineral oil	20 mg/l

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

Emission Point Reference No: SW8 – Cooling Water Screen Wash Water
Name of Receiving Waters: Barrow Estuary
Location: 26861E, 11452N
Volume to be emitted 1,970 m³/day

Parameter:	Emission Limit Value
Chlorine	0.5 mg/l

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

Note 1 below the tables requires the installation to cease discharging storm 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 rainfall in the vicinity of the “engine rooms” prior to discharging to the Barrow Estuary. The engine rooms as listed in the licence relate to the previous ESB power generating plant that was in use at this installation 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.

SW7 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 now discharges uncontaminated surface water with no potential for mineral oil contamination, therefore no ELV would be required.

SW8 consists of screen wash water from the cooling water intake. This discharge point was included on the IPPC licence issued in 2003. There was a note in the licence to cease discharging from SW8 on commencement of the CCGT. It is requested that the “Note 1” under the table for SW8 in Schedule B.2. be removed and the emission point licensed. This emission point is required for screening water for the CCGT.

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There is also a requirement carried over from historical licenses into Technical Amendment B to test storm waters for SW1, SW3b, SW4 and SW12 on a daily basis for TPH. This was changed via agreement to test the discharges weekly originally. SSE have agreement in writing from the EPA that the frequency of this testing was reduced to monthly for TPH (Correspondence Dated 27-04-2015). The new licence is requested to reflect this agreement.

Figure 1-2 Storm water test frequency

Amend Schedule C.2.3 Monitoring of Storm Water Emissions as follows:

Emission Point Reference No: SW1^{Note 1}, SW3b^{Note 1, 2}, SW4^{Note 1}, SW12^{Note 1}

Control Parameter	Monitoring Frequency	Key Equipment/Technique
pH	Daily	On-line pH probe with recorder
TPH	Daily	Standard Method
Visual Inspection	Daily	Sample and examine for colour and odour
Suspended Solids	Monthly	Standard Method

Note 1: On commencement of commercial operation of the new CCGT plant.
Note 2: SW3b shall be located at a point upstream of the connection with the foul water discharge.

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LS Approval - Notice - Amend Monitoring Approval

Subject
LS Approval - Notice - Amend Monitoring Approval

Created Date
27/04/2015

Dear Fergal,

I refer to your submission LR015741, "TPH Weekly monitoring" in relation to your proposal to amend the frequency of surface water monitoring for mineral oil analysis.

The approval is sought under Condition 6.8 of IE Licence P0606-03 for an alteration to the frequency of surface water monitoring for mineral oil from weekly, as previously agreed by the Agency, to monthly as requested in this correspondence.

I am to advise you that on the basis of the information provided, the Agency approves your request, contingent upon the following:

1. TPH monitoring of surface water monitoring points are sampled and analysed monthly for mineral oil.
2. Daily visual checks are completed and documented. A copy of the daily visual check shall be maintained on site for inspection by the Agency.
3. If the presence of hydrocarbon is noted during the daily visual check or on activation of the oil interceptor alarms, discharge of the surface water is not permitted. Sampling and analysis shall be completed for the presence of mineral oil in this instance.

You are reminded of the requirement to comply with the Conditions of IE Licence P0606-03 at all times.

The Agency may at any time, if it considers necessary, revisit and/or revoke this approval.

If you have any queries in relation to this matter please contact the undersigned or a member of Team B, OEE Licence Enforcement, Wexford on 053 9160600.

Yours sincerely,
 Eimear O'Keeffe
 Licence Enforcement Inspector
 Office of Environmental Enforcement, Wexford

SW11 is a discharge point that is very infrequently used at the installation. This line would only be used in the event that the site reservoir was to be cleaned out. This is a very infrequent process (i.e. a maintenance process that would be carried out approximately once every 10 years). This line would be dry for all other periods. The application includes a request to include this discharge point in the licence. It is suggested that a condition be included to demonstrate the water is uncontaminated prior to discharge, in agreement with the Agency.

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