

## Attachment-4-8-4-Site Condition Report

### 1.0 INTRODUCTION

This attachment addresses the requirements for a Site Condition Report to be submitted as part of the application by ADSIL for an IE licence.

The Baseline Report (Attachment 4-8-3) has been completed in accordance with the European Commission guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions.

The Agency's 2018 *Licence Application Form Guidance (Version 2)* states that a baseline report may fulfil the requirements of the site condition report. As such, this assessment outlines where the reader can find the required information in the Baseline Assessment as well as including the current site condition regarding air and noise quality.

### 2.0 PREVIOUS SITE REPORTS

There have been no prior Baseline reports or Site Condition reports completed for the site since ADSIL obtained ownership.

The following Environmental Site Investigation reports have been previously produced for the site and the results are summarised in Attachment 4-8-3:

- *'IGSL Site Investigation, Donore Road Drogheda, Industrial Development Authority, Clifton Scannel Emerson Associates, July 2000.*
- *Drogheda Due Diligence Report, ADSIL, 08th March 2019 (ref:18\_186)*

The baseline condition of the site is covered in Section 7.0 *Stage 5 – Environmental Setting* and Section 9.0 *Stage 7 – Site Investigation* of the Soil and Groundwater Water Baseline Assessment (Attachment 4.8.3). In these sections, summary details of the soil, ground and groundwater quality are discussed in relation to current quality standards. This includes details of all the major and minor surface water features in the area along with current quality status of these where applicable.

### 3.0 ENVIRONMENTAL CONDITIONS OF THE SITE

#### 3.1 Soil

The Baseline Report (Attachment 4-8-3) review of the site history has not identified any intrusive investigations completed at the site. Teagasc online soil mapping categorises the shallow soil at the proposed site as AminPD – Poorly drained mineral material which is mostly acidic in makeup. The exact depth to bedrock at the site is not known however based on a geotechnical investigation undertaken at the site in 2000 by IGSL (CSEA, 2019), bedrock depth has been shown to be circa 8 metres below ground level (mbgl) to 12.60 mbgl. Subsoil permeability in the study area is categorised as "Low" by the GSI.

The assessment of site history (OSI, 2019) confirms that the site has been in agricultural use since the earliest mapping available (1837-1842) until the construction of the ADSIL installation in 2021.

The only relevant bulk hazardous substances currently stored on site (substances stored or used onsite and which are classified as hazardous by the EPA under the Groundwater Regulations and contained in bulk storage) is diesel for emergency back-up generators.

The risk prevention measures present at the facility significantly reduce the potential for an environmental impact to soil or water to occur. These measures include bunded or double contained vessels, dual-contained fuel pipe system (when underground), spill management procedures and incorporation of interceptors on stormwater lines.

Source-pathway-receptor linkages were assessed for the bulk storage areas. It was concluded that there are no direct pathways to either the soil and groundwater environment. Interceptors are installed on the surface water drainage. A leakage from top up tank would be fully contained in the designated bund or the double skin lining of the day tank or belly tank, with leaks during delivery fully contained within the continuous hard stand delivery area. Any leakage outside of the delivery area would be contained within the drainage system.

### 3.2 Groundwater

The Baseline Report identified that, there have been no groundwater investigations completed at the site. Regional groundwater flows are expected to be in a north easterly direction towards the River Boyne.

The Groundwater Body (GWB) underlying the site is the Drogheda GWB (EU Groundwater Body Code: IE\_FA\_G\_008). Currently, the EPA (2022) classifies the Drogheda GWB as *not at risk* (Insert 7.6). However, the GWBs to the north and south of this currently are projected as "At Risk" i.e. at risk of not achieving good status. The Drogheda GWB previously had a "Good" status for the period 2013-2018.

The Kiltrough Public Water Scheme outer protection area (SO) borders the site to the south, the Kiltrough production well itself is 4.5 km to the south east of the proposed site.

The only relevant bulk hazardous substances (substances stored or used onsite and which are classified as hazardous by the EPA under the Groundwater Regulations and contained in bulk storage) stored onsite is diesel for emergency back-up generators.

There is only bulk diesel storage at the facility. The risk prevention measures present at the facility significantly reduce the potential for an environmental impact to soil or water to occur. These measures include bunded or double contained vessels, dual-contained fuel pipe system (when underground), spill management procedures and incorporation of interceptors on stormwater lines.

Source-pathway-receptor linkages were assessed for the bulk storage areas. It was concluded that there are no direct pathways to either the soil and groundwater environment. Interceptors are installed on the surface water drainage. A leakage from top up tank would be fully contained in the designated bund or the double skin lining of the day tank or belly tank, with leaks during delivery fully contained within the continuous hard stand delivery area. Any leakage outside of the delivery area would

be contained within the drainage system. The drainage system prior and would be unlikely to reach ground water.

### 3.3 Surface Water

The topography of the site slopes from west to east (approximately +56 to +48 metres above ordnance datum (mAOD)). Regional drainage is believed to run south to north towards the River Boyne which is c. 1 km to the north.

The internal surface drainage comprises a series of remnant drainage ditches. There are no direct hydrological pathways to the River Boyne. The Sheephouse Stream drains land to the northwest and is culverted under the motorway before leading to the River Boyne. There is no connectivity between the site and this stream.

The EPA assess the water quality of rivers and streams across Ireland using a biological assessment method, which is regarded as a representative indicator of the status of such waters and reflects the overall trend in conditions of the watercourse. The biological indicators range from Q5 - QU. Level Q5 denotes a watercourse with good water quality and high community diversity, whereas Level Q1 denotes very low community diversity and bad water quality.

The Old Bridge (RS07B042200) water quality monitoring station located upstream of the Boyne Estuary obtained a Q4- Good WFD status in 2020 and the water monitoring station at the River Mattock discharging into the Boyne upstream of (RS07B042200) obtained a Q4- Good WFD status in 2020.

The water quality status of the Sheephouse Stream, the Stagrennan Stream and the River Boyne Estuary is classified by the EPA as *moderate*.

In accordance with the WFD, each river catchment within the former ERBD was assessed by the EPA and a water management plan detailing the programme of measures was put in place for each. Currently, the EPA classifies the Sheephouse Stream waterbody to the northwest and the Stagrennan stream to the southeast as being under review most likely due to a lack of information being currently available to assign a risk rating. The Boyne Estuary (transitional Water bodies) to the north currently has a rating of 1a, '*At risk of not achieving good status*'.

### 3.4 Air

Ambient air quality monitoring was not undertaken as part of the preliminary assessment for this site. Reference has been made to the latest air quality monitoring programs that have been undertaken in recent years by the EPA. Attachment-7-1-3-2-Air Emissions Impact of this application provides a summary of the relevant air quality that has been used as a baseline for the air dispersion modelling completed for the project.

### 3.5 Noise

An environmental noise survey was conducted to quantify the existing noise environment. The survey was conducted in general accordance with guidance contained in the EPA NG4 publication and ISO 1996-2:2017 *Acoustics - Description, Measurement and Assessment of Environmental Noise -Determination of Sound Pressure Levels*. Specific details are set out in Attachment-7-1-3-2-Noise Emissions Impact Assessment of this application.

## 4.0 CONCLUSIONS

As stated in the EPA 2018 Licence Application Form Guidance (Version 2):

*“If a baseline report is submitted as part of this applications this may also fulfil the requirements to describe the condition of the site”.*

The baseline report (Attachment-4-8-3-Complete Baseline Report) submitted with this application and the information included within this document fulfils this requirement in relation to soil, surface water and ground water. The included Attachments, Attachment-7-1-3-2-Air Emissions Impact and Attachment-7-1-3-2-Noise Emissions Impact Assessment details the site condition in relation to Air and Noise.

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