

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:

- AWN (April 2016) Due Diligence report for subject the site entitled 'Soil & Water Assessment at a Greenfield Site in Cruiserath, Dublin 15.' Prepared for Clifton Scannell Emerson Associates (CSEA).

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 site as BminDW – Basic Deep Well Drained Mineral.

Depth to bedrock has been shown to be very shallow in this area based on site investigation at the proposed development site and surrounding developed sites. In general bedrock depth varies from at surface to 3.5 m bgl.

The assessment of site history (OSI, 2022) confirms that the site has been in agricultural use since the earliest mapping available (1837-1842) until the commencement construction of the ADSIL Installation in 2019.

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 would be fully contained in the top up tank bund or the double skin lining of the day tank or belly tank. Leaks during delivery will be fully contained within the continuous hard stand delivery area and directed towards the unloading bay sump. 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. The flow direction in the overburden generally follows no fixed pattern or trend. Flows of this nature are typical of low permeability clay strata with intermittent fill areas, where often the water level measures represents pore water seepages into the overburden monitoring well (opposed to bedrock wells) or perched groundwater conditions (not bedrock aquifer water). The clay is not considered to be a contamination pathway based on the discontinuous perched/pore water table meaning there is no continuous connectivity of shallow groundwater.

The Groundwater Body (GWB) underlying the site is the Dublin GWB (EU Groundwater Body Code: IE_EA_G_008). Currently, the EPA (2018) classifies the Dublin GWB as having 'Good Status', with a Ground Waterbody Risk score is 'under review'

There are no recorded groundwater resource protection zones in the area of the proposed site, i.e. zones surrounding a groundwater abstraction area.

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3.3 Surface Water

The topography of the site is generally consistent and flat across the site (approximately +85 mAOD). The most significant drainage system in the vicinity is the River Tolka and its tributaries. The drainage from site is directed to the Ballycoolin Stream tributary of the River Tolka located >1 km south of the site. The Mooretown Stream lies <500m north of the site. There are no streams on the site itself or along its boundaries.

The Installation is located within the former ERBD (now the Irish River Basin District), as defined under the European Communities Directive 2000/60/EC, establishing a framework for community action in the field of water policy – this is commonly known as the Water Framework Directive (WFD). It is situated in Hydrometric Area No. 09 of the Irish River Network. It is located within the Tolka Catchment.

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 water quality monitoring stations located on the River Tolka downstream of the site have quality ratings available within the last twenty years. The first of these (Mulhuddart Bridge RS09T010800) obtained a Q2-3 -Poor Status (in 2017), Old Corduff Road Bridge (RS09T010900) has a Q rating of 3, 'Poor' status (in 1994). The further downstream monitoring station (Abbotstown RS09T011000) obtained a Q rating of 3 which also denotes a "Poor" rating for River Tolka in 2016 and 2019.

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 WFD Ecological Status for the Tolka waterbody as having 'Poor Status' (Cycle Status 2013-2018) with a current WFD River Waterbody risk score 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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