


*This Report has been cleared for submission to the Board by Programme Manager,
Marie O'Connor*

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Signed:

Date: 10/05/2022

 <p>epa Environmental Protection Agency An Ghníomhaireacht um Chaomhánú Comhshaoil</p>	OFFICE OF ENVIRONMENTAL SUSTAINABILITY	
ENVIRONMENTAL LICENSING PROGRAMME MEMO		
TO:	Directors	Environmental Licensing Programme
FROM:	Jim Johnson	Environmental Licensing Programme
DATE:	10 May 2022	
RE:	Oral Hearing Request	
DETAIL:	Request to the EPA for an Oral Hearing of objections on Proposed Determination for SSE Generation Ireland Limited Great Island Generating Station, Campile, New Ross, County Wexford, IEL Reg: P0606-04	

Background

The first licence for the installation was issued in 2003 to the ESB (P0606-01). In 2011 the licence was reviewed to allow for the replacement of the heavy fuel oil plant with a new gas turbine. The revised licence (P0606-03) required the cessation of a number of surface water emissions – including wash water from the cooling water intake screens.

In 2020 the licensee applied for a licence review to authorise the discharge of the screen wash water and to update the licence in line with BAT Conclusions for Large Combustion Plant. The Licensee requires the reinstatement of the screen wash water as the intake screens are essential to supply cooling water to the plant and it was never intended to cease this emission.

The EPA issued a Proposed Determination to SSE Generation Ireland Limited Great Island Generating Station, Campile, New Ross, Wexford, Reg No. P0606-04 on 09 February 2022. The EPA subsequently received 1 First Party objection and 5 Third Party objections. A submission was received on 08 April 2022 from one third party in relation to the first party objection.

The 3 objectors listed below requested an Oral Hearing in the case of the above referenced Proposed Determination and these requests have been validated in accordance with the regulations:

<i>Objection No</i>	<i>Requestor</i>	<i>Date of Objection</i>
S010245	Paul Barlow, Woodstown Bay Shellfish Ltd	07/03/22
S010246	Patrick Moran, Oysters for Suir	07/03/22
S010250	Karin Dubsky, Coastwatch	08/03/22

The concerns/issues raised by these objectors as grounds for objection are as follows:

1. That the consented development is materially different to the activity licensed by the EPA and doesn't have planning permission.
2. That Environmental Impact Assessment (EIA) was not carried out.
3. That Best Available Techniques (BAT) for Industrial Cooling Water Systems were not applied.
4. That Appropriate Assessment screening was not carried out and Stage II Appropriate Assessment was not adequately carried out.
5. That the PD does not adequately take account of the objectives of the Water Framework Directive (WFD).
6. That the public, fishing and aquaculture industries and environmental NGOs have not had an opportunity to participate properly in the licence review process.
7. That the scope of the review was too limited, and the licence was not fully reviewed.
8. That the PD relies too heavily on 'self-monitoring' and 'self-reporting' by the licensee.

Assessment

The Oral Hearing requests were assessed against the following [criteria](#):

1. new issues not previously raised that are specific to the location or the development;
 2. the sensitivity of the location/local environment;
 3. if the matter is of national or regional importance;
 4. the scale or complexity of the development;
 5. significant new information.
1. New issues not previously raised that are specific to the location or the development; AND
 5. the presence of significant new information

The issues raised in the objections were considered as part of the licence review. A total of 16 submissions were received as part of the review. Having reviewed the issues raised in the objections and having regard to the Environmental Protection Agency (Industrial Emissions) (Licensing) (Amendment) Regulations 2020 (S.I. No. 190 of 2020), it is considered that no significant new information has been presented, nor are there new issues raised in the objections which would merit an oral hearing.

2. The sensitivity of the location or local environment

The installation is located on the Waterford Estuary at the confluence of the River Suir and River Barrow. There are two Special Areas of Conservation (SAC) within close proximity - River Barrow and River Nore SAC (002162) and Lower River Suir SAC (002137) as well as the Waterford Harbour (Cheekpoint/Arthurstown/Creadan) Shellfish Area. The sensitivity of the location and the local environment were considered during the licence review, in particular the potential impact of the chlorine discharge on the receiving water. The licence review included an Environmental Impact Assessment and an Appropriate Assessment of the activity. Submissions (14) received under the application process in relation to the impact on the estuary were carefully considered as part of the review. The sensitivity of the location and the local environment as raised in the objections will be considered again by the technical committee. Therefore an oral hearing is not merited.

3. Whether the activity is a matter of national or regional importance

The installation received planning permission directly from An Bord Pleanála as Strategic Infrastructure Development in 2010. An Environmental Impact Assessment (EIA) and Appropriate Assessment were carried out as part of the planning process. The licence facilitates the operation of a natural gas turbine delivering ca. 464 MW electrical output to the grid. Eirgrid have identified a potential capacity shortfall due to increasing demand and the closure of older power plants. The retention of existing generating plant is a key component of the CRU/EIRGRID plan for Security of Energy Supply¹. As such, the plant could be considered of national importance with regard to security of electricity supply.

4. The scale or complexity of the activity

The installation is a relatively large-scale operation with emissions to air and a number of emissions to water. However, these were fully addressed in the licence review. The PD specifies the necessary measures to provide that the installation shall be operated in accordance with the requirements of Section 83(5) of the EPA Act 1992, as amended and has regard to the AA and EIA. No particular matters were raised, or new information made available in the

¹ CRU Security of Supply Information Note <https://www.cru.ie/cru-publishes-security-of-supply-information-note/>

objection relating to the scale or complexity of the activity that would necessitate the holding of an oral hearing.

Recommendation

I consider that an oral hearing of the objections is not merited in this case. I consider that the objections can be fully and adequately assessed by a Technical Committee of the Agency.

Jim Johnson

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Environmental Licensing Programme

Office of Environmental Sustainability