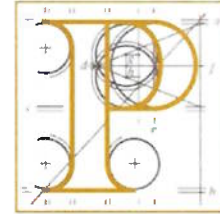


**Our Case Number:** ABP-319566-24



An  
Bord  
Pleanála

Health and Safety Authority  
3rd Floor  
1A South Mall  
Cork  
Co. Cork  
T12 R7WC

**Date:** 27 June 2024

**Re:** The proposed development will comprise of a 600MW Powerplant, 120MW Battery Energy Storage System, Above Ground Installation and associated ancillary works.  
Located within the townlands Kilcolgan Lower and Ralappane between Tarbert and Ballylongford Co. Kerry. ([www.steppowerplant.com](http://www.steppowerplant.com))

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Ellen Moss  
Executive Officer  
Direct Line: 01-8737285

PA09

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



## Ellen Moss

**From:** Dermot O'Callaghan <dermot\_ocallaghan@hsa.ie>  
**Sent:** 18 June 2024 10:10  
**To:** SIDS  
**Subject:** Further information request SID- Ref ABP-319566-24 HSA:0270020  
**Attachments:** Further Information request ref ABP-319566-24.pdf  
**Categories:** Ellen

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/Madam,

Please find letter attached seeking further information regarding Strategic Infrastructure Development(SID) within the townlands of Kilcolgan Lower and Ralappane between Tarbert and Ballylongford Co.Kerry

Regards,

Dermot

**Dermot O'Callaghan**

**Inspector CCPS Unit**

Tel: +353 1-7997886

Email: [dermot\\_ocallaghan@hsa.ie](mailto:dermot_ocallaghan@hsa.ie)

Web: [www.hsa.ie](http://www.hsa.ie)

Health and Safety Authority  
3<sup>rd</sup> Floor  
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IRELAND

An tÚdarás Sláinte agus Sábháilteachta  
An Bú hUirlár  
1A An Meal Theas  
Corcaigh  
T12 R7WC  
Éire



An tÚdarás Sláinte agus Sábháilteachta  
Health and Safety Authority

*Ár bhFís: Saolta agus fiontair shláintiúla, shábháilte agus tháirgiúla*  
*Our Vision: Healthy, safe and productive lives and enterprises*

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An tÚdarás Sláinte agus Sábháilteachta  
Health and Safety Authority

☎ 0818 289 389 ✉ [landuseplanning@hsa.ie](mailto:landuseplanning@hsa.ie) 🌐 [www.hsa.ie](http://www.hsa.ie)

An Bord Pleanála,  
64 Marlboro Street,  
Dublin 1,  
D01V902.

Our Ref: CAS-03103Z1B1

18/06/2024

**Re: The proposed development will comprise of a 600MW Powerplant, 120MW Battery Energy Storage System, Above Ground Installation and associated ancillary works and is located within the townlands Kilcolgan Lower and Ralappane between Tarbert and Ballylongford, Co.Kerry (Ref: ABP-319566-24).**

Dear Sir/Madam,

The Health and Safety Authority (the Authority), acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015), gives technical advice to the planning authority when requested, under regulation 24(2) in relation to:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

The Authority has reviewed Shannon Technology Energy Park Power Plant Land Use Planning Report ref. RMC0500653-R02 Version 3 and currently has insufficient information to provide technical advice on this application, therefore the Authority requests An Bord Pleanála to seek further information in accordance with regulation 24(10) from the applicant in relation to this application. The further information request is set out in Attachment 1.

The Authority will be in a position to provide advice to An Bord Pleanála within 4 weeks of receipt of the requested information.

If you have any queries please contact the undersigned.

Yours sincerely

**Dermot O' Callaghan**

*Inspector,*

*COMAH, Chemical Production & Storage (CCPS)*

## Attachment 1

1. The applicant is required to provide a site map with the boundary of the COMAH establishment clearly outlined. To note this is not the boundary of ownership, rather the COMAH establishment boundary. The COMAH boundary should also be included in Figure 11.
2. Provide further details on spill management and containment arrangements at the distillate tanker unloading area. It is the Authority's understanding that the tanks will be filled by road tanker as there is no reference to a jetty.
3. The report does not include hydrogen in the inventory of dangerous substances. However, in section 14.5.2.3 it states that hydrogen will be used for turbine cooling purposes. This will need to be assessed from hydrogen storage, to the point of use as required by the Technical Land Use Planning Guidance document (TLUPG).
4. It is noted that section 10 of the report provides maps with the risk outputs. Confirm how were the inputs for SAFETI calculated and what scenarios are they based on?. The outputs from the consequence modelling of the scenarios should also be provided in the report.
5. In relation to jet fires, the consequences from both vertical and horizontal fires should be modelled.
6. The report does not refer to the criteria set out in the TLUPG in relation to new establishments i.e.  $10^{-6}$ /yr for the public and  $5 \times 10^{-6}$ /yr for offsite workers. Confirm in the report that this criteria has been met.
7. A natural gas release scenario in the turbine enclosure should be assessed and included in the QRA. Loss of containment scenarios and frequencies from table 64 of TLUPG should be used in this instance.
8. Sections 3.3.2 and 5.2 refer to scenarios relating to steam. Steam is not classified as a dangerous substance under the Control of Major Accident Hazard (COMAH) Regulations 2015, consequently the COMAH Regulations do not apply to steam. However, it should be determined whether a steam scenario could initiate a major accident relating to a dangerous substance on the site, and if so, this should be included.
9. Section 3.3.2 refers to Battery Energy Storage Systems (BESS). A BESS is not a substance or mixture as defined under the CLP Regulations. It is therefore not subject to the COMAH Regulations. However, it should be determined if a BESS could be an initiator of a major accident relating to a dangerous substance on the site, and if so, this should be included.
10. Table 10 (scenario conditions) appears to be missing some pressure data.
11. S5.3 last para "The probability of successful leak detection and automatic isolation of the pipe has been taken as 0.99, with a detection time of 30s". What is the source for this data and where is it used in the analysis? Mitigation measures such as leak detection/isolation cannot be considered for the purposes of Land Use Planning, such modelling should always be conservative in nature and should not include the use of mitigatory factors such as detection systems.
12. S7.4 Effects of bunding– The meaning of this section is unclear, consider review of this content.
13. S7.4.3 refers to Regulations in Northern Ireland which are not relevant to this application are to be removed or amended to reflect relevant legislation in ROI.
14. S7.4.4 refers to Transformer oil. Confirm whether this substance meets the criteria of a dangerous substance as set out in in Schedule 1 of the COMAH Regulations 2015.
15. S7.6 refers to "triple containment", what does this mean? Provide further details.
16. In S1.4 it states that there will be 16,000m<sup>3</sup> diesel stored at the site whilst in table 7.2 it refers to 11,500m<sup>3</sup> diesel. Confirm which amount is correct and correct figure throughout document.