

# **Decommissioning Plan**

Proposed Substation, Underground Cabling & Access Roads to Knocknamork Renewable Energy Development







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& Access Roads to Knocknamork Renewable

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# **Table of Contents**

1.	INTRODUCTION	1
1.1	Scope of the Decommissioning Plan	1
2.	PROPOSED DEVELOPMENT DETAILS	2
	Site Location and Description	2 4 4 5
3.	ENVIRONMENTAL MANAGEMENT	6
3.1 3.2 3.3 3.4 3.5	Site Drainage	6 6 7
3.6	Traffic Management	8
	Waste Management	8 9 9 9
3.8	3.7.3.4 Waste Management Plan Conclusion	
	3.8.1 Roles and Responsibilities	
4.	EMERGENCY RESPONSE PLAN	.12
4.2 4.3	4.1.1 Roles and Responsibilities	12 13 14 15 16 16
5.	PROGRAMME OF WORKS	.18
5.1	Decommissioning Schedule	18
6.	MITIGATION PROPOSALS	.19
7.	MONITORING PROPOSALS	.22
8.	COMPLIANCE AND REVIEW	.25
8.1 8.2 8.3 8.4	Site inspections and Environmental Audits  Auditing  Environmental Compliance  Corrective Action Procedure	25 25



8.5	Decommissioning Phase Plan Review	26
TABLE	OF TABLES	
Table 3-1	Expected waste types arising during the Decommissioning Phase	9
Table 4-1	Hazards associated with potential emergency situations	13
Table 4-2	Emergency Contacts	16
Table 4-3	Emergency Response Plan Items Applicable to the Site Induction Process	17
Table 6-1	Mitigation Measures	20
Table 7-1	Schedule of Monitoring Proposals	23
TABLE	OF FIGURES	
Figure 2-1	Site Layout Map	3
Figure 4-1	Emergency Response Procedure Chain of Command	12
	Indicative Decommissioning Schedule	



1.

### INTRODUCTION

This Decommissioning Plan has been prepared by MKO on behalf of Knocknamork Ltd. for the decommissioning of the Proposed Development as detailed in Chapter 4 of the Environmental Impact Assessment Report (EIAR). In addition, this Decommissioning Plan includes reference to the Permitted Development (Pl. Ref. No. 19/4972).

This document is being prepared alongside an Environmental Impact Assessment Report (EIAR) as part of applications for planning permission for the Proposed Development to An Bord Pleanála (ABP), Cork County Council (CCC) and Kerry County Council (KCC). Decommissioning of the Permitted Development will be scheduled to take place after its proposed 25-year lifespan and this will in turn trigger the decommissioning of the Proposed Development.

This report provides the environmental management framework to be adhered to during the decommissioning phase of the Proposed Development and it incorporates the mitigating principles to ensure that the work is carried out in a way that minimises the potential for any environmental impacts to occur.

### Scope of the Decommissioning Plan

This report is presented as a guidance document for the decommissioning of the Proposed Development

Where the term 'site' is used in the Decommissioning Plan it refers to all works associated with the Proposed Development, including enabling works. The Decommissioning Plan clearly outlines the mitigation measures and monitoring proposals that are required to be adhered to in order to complete the works in an appropriate manner and.

The report is divided into eight sections, as outlined below:

**Section 1** provides a brief introduction as to the scope of the report.

**Section 2** outlines the Proposed Development details, detailing the targets and objectives of this plan along with providing an overview of works methodologies that will be adopted throughout decommissioning.

**Section 3** sets out details of the environmental controls to be implemented on site including the mechanisms for implementation. A waste management plan is also included in this section.

**Section 4** outlines the Emergency Response Procedure to be adopted in the event of an emergency in terms of site health and safety and environmental protection.

**Section 5** sets out a programme for the timing of the works.

**Section 6** consists of a summary table of all mitigation measures to be adhered to during the decommissioning-phases.

**Section 7** consists of a summary table of all monitoring requirements for the decommissioning-phase.

Section 8 outlines the proposals for reviewing compliance with the provisions of this report



### PROPOSED DEVELOPMENT DETAILS

### 2.1 Site Location and Description

The Proposed Development site which straddles the county boundary between Co. Kerry and Co. Cork is located approximately 6 kilometres southwest of the town of Millstreet and 3 kilometres northwest of the village of Ballyvourney. The Grid Reference co-ordinates of the approximate start and end points for the Proposed Development site are E514036, N581567 and E525824, N584341 respectively. Land-use on the site and in the wider area comprises a mix of commercial forestry, wind farm development, cutover peat bog and some agricultural pastures.

The Permitted Development comprises 7 no. turbines, up to 70,000m<sup>2</sup> of solar panels on ground mounted steel frames and all associated works. Planning permission was granted by Cork County Council on 2<sup>nd</sup> January 2020 (Ref. No. 19/4972).

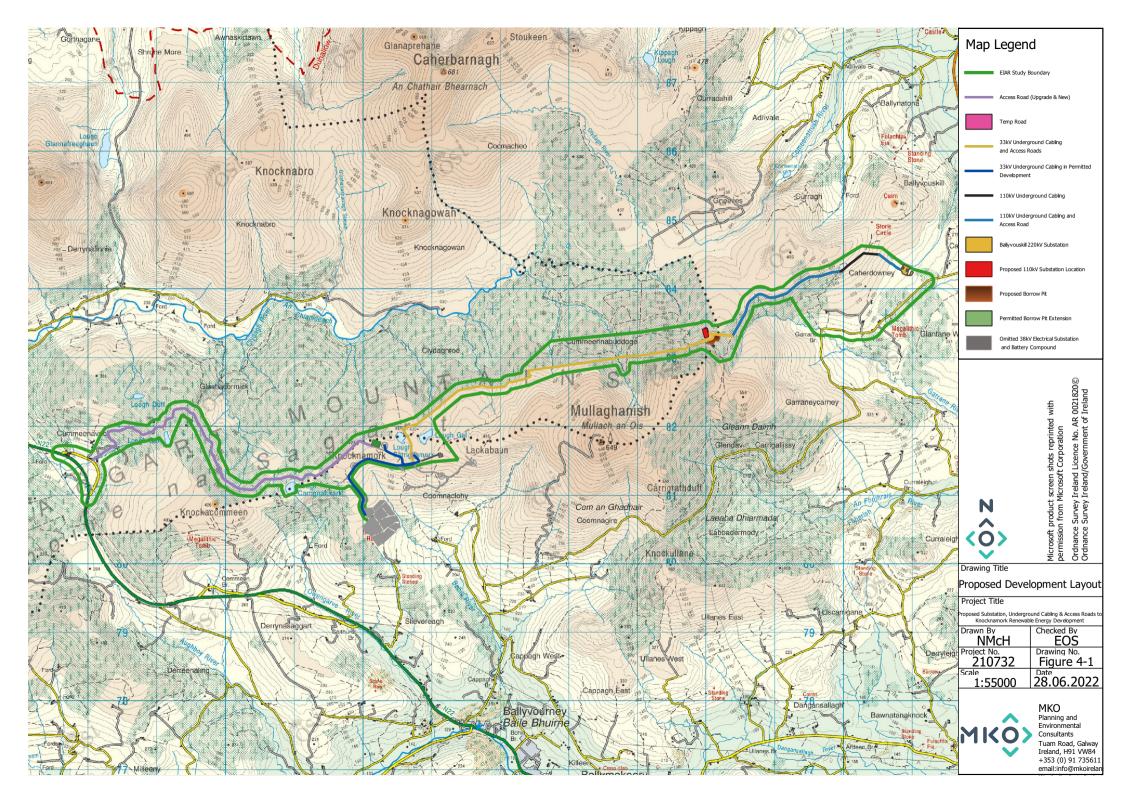
The Proposed Development comprises the construction of a 110kV electrical substation, underground cabling and access roads, and all associated works. A detailed description of the Proposed Development is provided in section 4.2 of the EIAR.

# Description of the Proposed Development

The proposed development in it's entirety, including the works subject of a proposed application for planning permission to ABP, CCC and KCC, comprises the provision of the following:

- 110 kV electrical substation with 2 no. control buildings with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, waste water holding tank and all ancillary works;
- ii. Underground electrical cabling (110kV);
- iii. Underground electrical cabling (33kV);
- iv. Access Roads (new and upgrade of existing)
- v. Temporary access road;
- vi. Upgrade of access junctions;
- vii. Amendments to the Permitted Development (Ref. No. 19/4972), including extension to the borrow pit and the omission of the 38kV Electrical Substation, 38KV underground cabling and Battery Storage compound;
- viii. Borrow pit;
- ix. Site Drainage;
- x. Forestry Felling; and
- xi. All associated site development works and apparatus.

The site layout showing individual elements of the Proposed Development is shown in Figure 2-1. As construction will be completed, elements of the project that will be developed as a temporary facilitator will either be removed, restored to its original condition or will naturally revegetate. This includes the temporary access road which will need to be constructed again to facilitate transport of turbines offsite during decommissioning of the permitted development.





All access roads and hardstanding areas will form part of a site roadway network which will be left in situ for future use. It is intended that decommissioning will only remove underground cabling (33kV) from the site with ducting left in-situ, and reinstate areas where infrastructure is removed. As mentioned previously given the Proposed Development is an integral part of the Permitted Development, the decommissioning will occur in tandem with the decommissioning of the Permitted Development (Pl. Ref. No. 19/4972).

# 2.3 Targets and Objectives

The decommissioning phase works will be completed to approved standards, which include specified materials, standards, specifications and codes of practice. This Decommissioning Plan has considered environmental issues and this is enhanced by the works proposals as part of decommissioning.

The key site targets are as follows:

- Ensure decommissioning works and activities are completed in accordance with mitigation and best practice approach presented in the accompanying Environmental Impact Assessment Report (EIAR) and associated planning documentation.
- Ensure decommissioning works and activities have minimal impact/disturbance to local landowners and the local community.
- Ensure decommissioning works and activities have minimal impact on the natural environment.
- Adopt a sustainable approach to decommissioning; and,
- Provide adequate environmental training and awareness for all project personnel.

The key site objectives are as follows:

- Using recycled materials if possible, e.g. soil and overburden material for backfilling and reinstatement.
- Ensure sustainable sources for materials supply where possible.
- Avoidance of any pollution incident or near miss as a result of working around or close to existing watercourses and having emergency measures in place.
- > Avoidance of vandalism.
- Keeping all watercourses free from obstruction and debris.
- Correct implementation of the sustainable drainage system (SuDS) drainage design principles.
- Keep impact of decommissioning works to a minimum on the local environment, watercourses, and wildlife.
- Correct fuel storage and refuelling procedures to be followed.
- > Good waste management and housekeeping to be implemented.
- Air and noise pollution prevention to be implemented.
- Monitoring of the works and any adverse effects that it may have on the environment.

  Decommissioning methods will be altered where it is found there is the potential to have an adverse effect on the environment.

# 2.4 Decommissioning Methodologies Overview

#### 2.4.1 Introduction

An experienced main contractor will be appointed to undertake the of the decommissioning of the Proposed Development. The main contractor will comply with the Construction and Environmental Management Plan (CEMP) prepared for the construction phase and implemented during operation and any revisions made to this document throughout the phase in which it is adopted. An overview of the anticipated decommissioning methodologies is provided below

4



### 2.4.2 **Decommissioning Plan**

The proposed anticipated decommissioning methodology is summarised under the following main headings:

- Underground Cabling
- > Transport Route Accommodation Works

#### 2.4.2.1 Underground Cabling

The electrical and fibre optic cabling that connects each turbine and solar array to the proposed onsite 110 kV substation will be removed from the 33kV underground cable ducting. The cabling will be pulled from the cable duct using a mechanical winch which will extract the cable and re-roll it on to a cable drum. This will be undertaken at each of the joint bays/pull pits along the underground cabling route. The original pulling pits will be excavated using a mechanical excavator and will be fully reinstated once the cables are removed.

The cable ducting will be left in-situ as it is considered the most environmentally prudent option, avoiding unnecessary excavation and soil disturbance for an underground element that is not visible. The site roadways along the cabling routes could be in use for purposes other than the operation of the development by the time the decommissioning of the Permitted Development is to be considered, and therefore it may be more appropriate to leave the site roads in situ for future use. It is envisaged that the roads will provide a useful means of extracting the commercial forestry crop which exists on the site, along with general agricultural use.

#### 2.4.2.2 Transport Route Accommodation Works

During the construction of the Proposed Development, a number of road and junction improvements and temporary works will be completed to provide access to the site during materials delivery. All these accommodation areas will be re-used during decommissioning. This includes the re-instatement and re-establishment of the temporary access road from the N22 to the old N22 alignment to facilitate the removal of abnormally large vehicle loads. The use of this temporary access road will be carefully managed, and the route will be blocked with traffic bollards when not in use for component removal. On completion of the component removal from the site, the temporary access road and accommodation areas will be fully re-instated.



3.2

### ENVIRONMENTAL MANAGEMENT

The following sections give an overview of the drainage design, dust and noise control measures, a waste management plan for the site and the implementation of the environmental management procedures for the site.

### 3.1 Site Drainage

The site drainage features for this site during its construction and operation are outlined in Section 4.5 of the EIAR which accompany this application. As this Decommissioning Plan is a working document and is presented as an Appendix to the EIAR, the drainage measures are not included in this document. When the final plan is prepared prior to decommissioning and presented as a standalone document, all drainage measures will be included in that document as required. The drainage proposals will be developed further prior to the commencement of decommissioning if deemed necessary. However, it should be noted that by the time decommissioning is undertaken after the planned 25-year lifespan of the Permitted Development, the areas within the site will have revegetated resulting in a resumption of the natural drainage management that will have existed prior to any construction. It is not anticipated that the decommissioning phase will interrupt this restored drainage regime in any way with the works proposed.

# Refuelling, Fuel and Hazardous Materials Storage

The plant and equipment used during decommissioning will require refuelling during the works. Appropriate management of fuels will be required to ensure that incidents relating to refuelling are avoided. The following mitigation measures are proposed to avoid release of hydrocarbons at the site:

- Road-going vehicles will be refuelled off site wherever possible.
- On-site refuelling will be carried out at designated refuelling areas at various locations throughout the site. Machinery will be refuelled directly by a fuel truck that will come to site as required
- Only designated trained and competent operatives will be authorised to refuel plant on site. Mobile measures such as drip trays and fuel absorbent mats will be used during all refuelling operations.
- Fuel volumes stored on site should be minimised. Any fuel storage areas will be bunded appropriately.
- The plant used will be regularly inspected for leaks and fitness for purpose;
- An emergency plan for the decommissioning phase to deal with accidental spillages will be developed. Spill kits will be available to deal with and accidental spillage in and outside the refuelling area.
- A programme for the regular inspection of plant and equipment for leaks and fitness for purpose will be developed at the outset of the decommissioning phase

### 3,3 **Dust Control**

Dust can be generated from on-site activities during decommissioning such as backfilling of foundations and travelling on site roads during prolonged periods of dry weather. The extent of dust generation will depend on the type of activity undertaken, the location, the nature of the dust, i.e. soil, and the weather. In addition, dust dispersion is influenced by external factors such as wind speed and direction and/or, periods of dry weather. Site traffic movements also have the potential to generate dust as they travel along the haul route.



#### Proposed measures to control dust include:

- Any site roads with the potential to give rise to dust will be regularly watered, as appropriate, during dry and/or windy conditions.
- The designated public roads outside the site and along the main transport routes to the site will be regularly inspected by the Site Manager for cleanliness and cleaned as necessary.
- Material handling systems and material storage areas will be designed and laid out to minimise exposure to wind.
- Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods.
- The transport of material, which has significant potential to generate dust, will be undertaken in tarpaulin-covered vehicles where necessary.
- All site related traffic will have speed restrictions on un-surfaced roads to 15 kph.
- **Daily** inspection of the site to examine dust measures and their effectiveness.
- When necessary, sections of the haul route will be swept using a truck mounted vacuum sweeper

### 3.4 **Noise Control**

The operation of plant and machinery, including site vehicles, is a source of potential impact that will require mitigation at all locations within the site. Proposed measures to control noise include:

- Diesel generators will be enclosed in sound proofed containers to minimise the potential for noise impacts.
- Plant and machinery with low inherent potential for generation of noise and/or vibration will be selected. All plant and equipment to be used on-site will be modern equipment and will comply with the European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Regulations.
- Regular maintenance of plant will be carried out in order to minimise noise emissions. Particular attention will be paid to the lubrication of bearings and the integrity of silencers.
- All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the works.
- Compressors will be of the "sound reduced" models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers.
- Machines, which are used intermittently, will be shut down during those periods when they are not in use.
- Training will be provided by the Site Manager to drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation; and,
- Local areas of the haul route will be condition monitored and maintained, if necessary

### 3.5 Invasive Species Management

The soil material that will be imported to site as part of the foundation backfilling will be free of any invasive species (listed under the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011). The site manager will take steps to ensure this sourcing suitably clean material and verify the quality of the material by having it inspected prior to bringing it to site by a suitably qualified ecologist. Prior to decommissioning, a suitably qualified ecologist will complete an invasive species survey of the source material used for the site reinstatement works as well as along the cable route to identify invasive species at joint bay locations where excavation to expose the cabling for removal will be required.



### 3.6 Traffic Management

A Traffic Management Plan will be prepared in advance of any decommissioning works. The removal of development components from site will be undertaken for a specialist haulier. The traffic management arrangements as outlined in the EIAR will be agreed in advance of decommissioning with the competent authority.

### 3.7 Waste Management

This section of the Decommissioning Plan provides a Waste Management Plan (WMP) which outlines the best practice procedures during the decommissioning of the Proposed Development. The WMP will outline the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of decommissioning. Disposal of waste will be a last resort.

### 3.7.1 **Legislation**

The Waste Management Act 1996 and its subsequent amendments provide for measures to improve performance in relation to waste management, recycling and recovery. The Act also provides a regulatory framework for meeting higher environmental standards set out by other national and EU legislation.

The Act requires that any waste related activity has to have all necessary licenses and authorisations. It will be the duty of the Waste Manager on the site of the Proposed Development to ensure that all contractors hired to remove waste from the site have valid Waste Collection Permits. It will then be necessary to ensure that the waste is delivered to a licensed or permitted waste facility. The hired waste contractors and subsequent receiving facilities must adhere to the conditions set out in their respective permits and authorisations.

The Department of the Environment provides a document entitled, 'Best Practice Guidelines for the Preparation of Resource Management Plans for Construction and Demolition Projects' (2021). It is important to emphasise that no demolition will take place at this site, however, this document was referred to throughout the process of completing this WMP.

### 3.7.2 Waste Management Hierarchy

The waste management hierarchy sets out the most efficient way of managing in the following order:

#### **Prevention and Minimisation:**

The primary aim of the WMP will be to prevent and thereby reduce the amount of waste generated at each stage of the project.

#### Reuse of Waste:

Reusing as much of the waste generated on site as possible will reduce the quantities of waste that will have to be transported off site to recovery facilities or landfill.

#### Recycling of Waste:

There are several established markets available for the beneficial use of Construction and Demolition waste such as using waste concrete as fill for new roads.



At all times during the implementation of the WMP, disposal of waste to landfill will be considered only as a last resort.

### 3.7.3 Waste Arising from Decommissioning

The relevant components will be removed from site for re-use, recycling or waste disposal. Any structural elements that are not suitable for recycling will be disposed of in an appropriate manner. All lubrication fluids will be drained down and put aside for appropriate collection, storage, transport and disposal. Any materials which cannot be re-used or recycled will be disposed of by an appropriately licenced contractor.

The waste types arising from the decommissioning of the Proposed Development are outlined in Table 3-1 below.

Table 3-1 Expected waste types arising during the Decommissioning Phase

36		Truc C 1
Material Type	Example	EWC Code
Cables	Electrical wiring	17 04 11
	Copper, aluminium, lead and	
Metals	iron	17 04 07

#### 3.7.3.1 **Reuse**

Many construction materials can be reused several times before they have to be disposed of:

Electrical wiring can be reused on similar wind energy projects

#### 3.7.3.2 **Recycling**

If a certain type of construction material cannot be reused onsite, then recycling is the most suitable option.

All waste that is produced during the decommissioning phase including dry recyclables will be deposited in the on-site skip initially and sent for subsequent segregation at a remote facility. The anticipated volume of all waste material to be generated at the Proposed Development is low which provides the justification for adopting this method of waste management.



#### 3.7.3.3 Implementation

#### 3.7.3.3.1 Roles and Responsibilities

Prior to the commencement of the decommissioning, a Construction Waste Manager will be appointed by the Contractor. The Construction Waste Manager will oversee the implementation of the objectives of the plan, ensuring that all hired waste contractors have the necessary authorisations and that the waste management hierarchy is adhered to. The person nominated must have sufficient authority so that they can ensure everyone working on the decommissioning adheres to the management plan.

#### 3.7.3.3.2 **Training**

It is important for the Construction Waste Manager to communicate effectively with colleagues in relation to the aims and objectives of the waste management plan. All employees working on site during the decommissioning phase of the project will be trained in materials management and thereby, should be able to:

- Distinguish reusable materials from those suitable for recycling.
- **Ensure maximum segregation at source.**
- **>** Co-operate with site manager on the best locations for stockpiling reusable materials.
- > Separate materials for recovery; and
- Identify and liaise with waste contractors and waste facility operators.

#### 3.7.3.3.3 Record Keeping

The WMP will provide systems that will enable all arisings, movements and treatments of construction waste to be recorded. This system will enable the contractor to measure and record the quantity of waste being generated. It will highlight the areas from which most waste occurs and allows the measurement of arisings against performance targets. The WMP can then be adapted with changes that are seen through record keeping.

The fully licensed waste contractor employed to remove waste from the site will be required to provide documented records for all waste dispatches leaving the site. Each record will contain the following:

- > Consignment Reference Number
- Material Type(s) and EWC Code(s)
- Company Name and Address of Site of Origin
- > Trade Name and Collection Permit Ref. of Waste Carrier
- > Trade Name and Licence Ref. of Destination Facility
- Date and Time of Waste Dispatch
- Registration no. of Waste Carrier vehicle
- Weight of Material
- > Signature of Confirmation of Dispatch detail
- Date and Time of Waste Arrival at Destination
- Site Address of Destination Facility

### 3.7.3.4 Waste Management Plan Conclusion

The WMP will be properly adhered to by all staff involved in the project which will be outlined within the induction process for all site personnel. The waste hierarchy should always be employed when designing the plan to ensure that the least possible amount of waste is produced during decommissioning. Reuse of certain types of construction wastes will cut down on the cost and requirement of raw materials therefore further minimising waste levels.



This WMP has been prepared to outline the main objectives that are to be adhered to and it will be updated as required prior to decommissioning.

# 3.8 **Environmental Management Implementation**

# 3.8.1 Roles and Responsibilities

The Site Manager and/or Environmental Clerk of Works (ECoW) are the project focal point relating to decommissioning-related environmental issues.

In general, the ECoW will maintain responsibility for monitoring the decommissioning works and Contractors/Sub-contractors from an environmental perspective. The ECoW will act as the regulatory interface on environmental matters. The Site Manager will be responsible for reporting to and liaising with Kerry and Cork County Councils and other statutory bodies as required.

The Site Manager in consultation with the ECoW will be responsible for employing the services of a suitably qualified ecologist and any other suitably qualified professionals as required throughout the decommissioning works.



### 4. EMERGENCY RESPONSE PLAN

An Emergency Response Plan (ERP) is presented in this section of the Decommissioning Plan. It provides details of procedures to be adopted in the event of an emergency in terms of site health and safety and environment protection

### **Emergency Response Procedure**

The site ERP includes details on the response required and the responsibilities of all personnel in the event of an emergency. The ERP will require updating and submissions from the contractor/PSCS and sub-contractors as decommissioning progresses. Where sub-contractors that are contracted on site are governed by their own emergency response procedure a bridging arrangement will be adopted to allow for inclusion of the sub-contractor's ERP within this within this document.

This is a working document that requires updating throughout the various stages of the project.

### 4.1.1 Roles and Responsibilities

The chain of command during an emergency response sets out who is responsible for coordinating the response. The Site Supervisor/Construction Manager will lead the emergency response which makes them responsible for activating and coordinating the emergency response procedure. The other site personnel who can be identified at this time who will be delegated responsibilities during the emergency response are presented in Figure 4-1. In a situation where the Site Supervisor/ Construction Manager is unavailable or incapable of coordinating the emergency response, the responsibility will be transferred to the next person in the chain of command outlined in Figure 4-1. This will be updated throughout the various stages of the project.

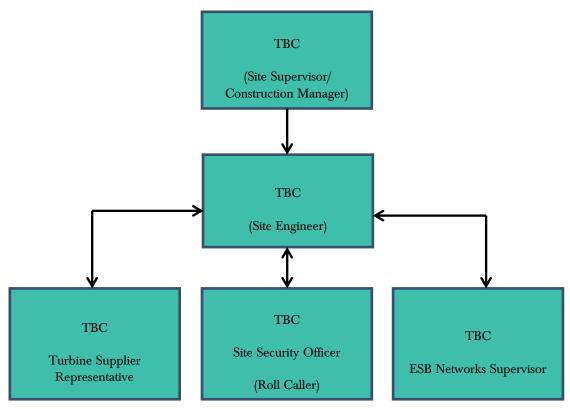


Figure 4-1 Emergency Response Procedure Chain of Command



### 4.1.2 **Initial Steps**

To establish the type and scale of potential emergencies that may occur, the following hazards have been identified in Table 4-1 below as being potential situations that may require an emergency response in the event of an occurrence.

Table 4-1 Hazards associated with potential emergency situations

able 4-1 Hazarus associateu with potential emergency situations				
Hazard	Emergency Situation			
Construction Vehicles: Dump trucks, tractors,	Collision or overturn which has resulted in			
excavators, cranes etc.	operator or third-party injury.			
	Entanglement, amputation or electrical shock			
Abrasive wheels/Portable Tools	associated with portable tools			
	Electrical shock or gas leak associated with an			
Contact with services	accidental breach of underground services			
Fire	Injury to operative through exposure to fire			
Falls from heights including falls from scaffold				
towers, scissor lifts, ladders and roofs	Injury to operative after a fall from a height			
	Illness unrelated to site activities of an operative			
Sickness	e.g. heart attack, loss of consciousness, seizure			

In the event of an emergency situation associated with, but not restricted to, the hazards outlined in Table 4-1 the site supervisor/Construction Manager will carry out the following:

- Establish the scale of the emergency situation and identify the number of personnel, if any, have been injured or are at risk of injury.
- Where necessary, sound the emergency siren/foghorn that activates an emergency evacuation on the site. The Site Supervisor/Construction Manager must proceed to the assembly point if the emergency poses any significant threat to their welfare and if there are no injured personnel at the scene that require assistance. The Site Supervisor/Construction Manager will be required to use their own discretion at that point. In the case of fire, the emergency evacuation of the site should proceed, without exception. The site evacuation procedure is outlined in Section 4.1.3.
- Make safe the area if possible and ensure that there is no identifiable risk exists with regard to dealing with the situation e.g. if a machine has turned over, ensure that it is in a safe position so as not to endanger others before assisting the injured.
- Contact the required emergency services or delegate the task to someone. If delegating the task, ensure that the procedures for contacting the emergency services as set out in Section 4.2 is followed.
- Take any further steps that are deemed necessary to make safe or contain the emergency incident e.g. cordon off an area where an incident associated with electrical issues has occurred.
- Contact any regulatory body or service provider as required e.g. ESB Networks the numbers for which as provided in Section 4.3.
- **Contact** the next of kin of any injured personnel where appropriate

#### 4.1.3 Site Evacuation/Fire Drill

A site evacuation/fire drill procedure will provide basis for carrying out the immediate evacuation of all site personnel in the event of an emergency. The following steps will be taken:



- Notification of the emergency situation. Provision of a siren or foghorn to notify all personnel of an emergency situation.
- An assembly point will be designated in the construction compound area and will be marked with a sign. All site personnel will assemble at this point.
- > A roll call will be carried out by the Site Security Officer to account for all personnel on site
- > The Site Security Officer will inform the Site Supervisor/Construction Manager when all personnel have been accounted for. The Site Supervisor/Construction Manager will decide the next course of action, which be determined by the situation that exists at that time and will advise all personnel accordingly.

All personnel will be made aware of the evacuation procedure during site induction. The Fire Services Acts of 1981 and 2003 require the holding of fire safety evacuation drills at specified intervals and the keeping of records of such drills.

### **4.1.4** Spill Control Measures

Every effort will be made to prevent an environmental incident during the decommissioning phase of the project. Oil/fuel spillages are one of the main environmental risks that will exist on the site which will require an emergency response procedure. The importance of a swift and effective response in the event of such an incident occurring cannot be over emphasised. The following steps provide the procedure to be followed in the event of such an incident:

- > Stop the source of the spill and raise the alarm to alert people working in the vicinity of any potential dangers.
- > If applicable, eliminate any sources of ignition in the immediate vicinity of the incident.
- Contain the spill using the spill control materials, track mats or other material as required. Do not spread or flush away the spill.
- If possible, cover or bund off any vulnerable areas where appropriate such as drains, watercourses or sensitive habitats.
- If possible, clean up as much as possible using the spill control materials.
- Contain any used spill control material and dispose of used materials appropriately using a fully licensed waste contractor with the appropriate permits so that further contamination is limited.
- Notify the ECoW immediately giving information on the location, type and extent of the spill so that they can take appropriate action.
- The ECoW will inspect the site and ensure the necessary measures are in place to contain and clean up the spill and prevent further spillage from occurring.
- The ECoW will notify the appropriate regulatory body such as Kerry and Cork County Councils, and the Environmental Protection Agency (EPA), if deemed necessary.

The importance of a swift and effective response in the event of such an incident occurring cannot be over emphasised. Environmental incidents are not limited to just fuel spillages. Therefore, any environmental incident must be investigated in accordance with the following steps.

- > The ECoW must be immediately notified.
- If necessary, the ECoW will inform the appropriate regulatory authority. The appropriate regulatory authority will depend on the nature of the incident.
- The details of the incident will be recorded on an Environmental Incident Form which will provide information such as the cause, extent, actions and remedial measures used following the incident. The form will also include any recommendations made to avoid reoccurrence of the incident.
- If the incident has impacted on a sensitive receptor such as an archaeological feature the ECoW will liaise with the Project Archaeologist.



A record of all environmental incidents will be kept on file by the ECoW and the Main Contractor. These records will be made available to the relevant authorities such as Kerry and Cork County Councils, EPA if required.

The ECoW will be responsible for any corrective actions required as a result of the incident e.g. an investigative report, formulation of alternative works methodologies or environmental sampling, and will advise the Main Contractor as appropriate.

### 4.2 Contact the Emergency Services

In the event of requiring the assistance of the emergency services the following steps should be taken:

**Stay calm**. It is important to take a deep breath and not get excited. Any situation that requires 999/112 is, by definition, an emergency. The dispatcher or call-taker knows that and will try to move things along quickly, but under control.

Know the <u>location</u> of the emergency and the number you are calling from. This may be asked and answered a couple of times but do not get frustrated. Even though many emergency call centres have enhanced capabilities meaning they are able to see your location on the computer screen they are still required to confirm the information. If for some reason you are disconnected, at least emergency crews will know where to go and how to call you back.

Wait for the call-taker to ask questions, then answer clearly and calmly. If you are in danger of assault, the dispatcher or call-taker will still need you to answer quietly, mostly "yes" and "no" questions.

If you reach a recording, listen to what it says. If the recording says your call cannot be completed, hang up and try again. If the recording says all call takers are busy, WAIT. When the next call-taker or dispatcher is available to take the call, it will transfer you.

Let the call-taker guide the conversation. He or she is typing the information into a computer and may seem to be taking forever. There is a good chance, however, that emergency services are already being sent while you are still on the line.

**Follow all directions**. In some cases, the call-taker will give you directions. Listen carefully, follow each step exactly, and ask for clarification if you do not understand.

**Keep your eyes open**. You may be asked to describe victims, suspects, vehicles, or other parts of the scene.

Do not hang up the call until directed to do so by the call taker.

Due to the remoteness of the site it may be necessary to liaise with the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and sub-contractors aware of any such arrangement or requirement if applicable. A list of emergency contacts is presented in Table 4-2.



### 4.3 Contact Details

A list of emergency contacts is presented in Table 4-2. A copy of these contacts will be included in the Site Safety Manual and in the site offices and the various site welfare facilities.

Table 4-2 Emergency Contacts

Table 4-2 Emergency Contacts	
Contact	Telephone no.
Emergency Services – Ambulance, Fire, Gardaí	999/112
Doctor -Millstreet Medical Centre	029 70124
Hospital –Millstreet Community Hospital	029 70003
ESB Emergency Services	1850 372 999
Gas Networks Ireland Emergency	1850 20 50 50
Gardaí –Millstreet Garda Station	029 70003
Health and Safety Co-ordinator - Health & Safety Services	TBC
Health and Safety Authority	1890 289 389
Inland Fisheries Ireland (IFI)	1890 347 424
Project Supervisor Construction Stage (PSCS): TBC	TBC
Project Supervisor Design Stage (PSDS): TBC	TBC
Client: Knocknamork Ltd.	ТВС

### 4.3.1 Procedure for Personnel Tracking

All operatives on site without any exception will have to undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.

In the event of a site operative becoming in an emergency situation where serious injury has occurred and hospitalisation has taken place, it will be the responsibility of the Site Manager or next in command if unavailable to contact the next of kin to inform them of the situation that exists.

### 4.4 Induction Checklist

Table 4-3 provides a list of items highlighted in this ERP which must be included or obtained during the mandatory site induction of all personnel that will work on the site. This will be updated throughout the various stages of the project.



Table 4-3 Emergency Response Plan Items Applicable to the Site Induction Process

ERP Items to be included in Site Induction	Status
All personnel will be made aware of the evacuation procedure during site induction	
Due to the remoteness of the site, it may be necessary to liaise with and assist the emergency services on the ground in terms of locating the site. This may involve providing an escort from a designated meeting point that may be located more easily by the emergency services. This should form part of the site induction to make new personnel and subcontractors aware of any such arrangement or requirement if applicable.	
All operatives on site without any exception will have undergo a site induction where they will be required to provide personal contact details which will include contact information for the next of kin.	



# PROGRAMME OF WORKS

# **Decommissioning Schedule**

The decommissioning phase will take approximately 6-8 months to complete from commencing the removal of development components to the final reinstatement of the site.

At this time, it is not possible to determine when decommissioning will take place.

The phasing and scheduling of the main decommissioning task items are outlined in Figure 5-1 below, where the 1<sup>st</sup> January has been shown as an indicative start date for decommissioning to commence.

ID	Task Name	Task Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
1	Site Health and Safety									
2	Turbine Decommissioning	Disconnect power output								2
3	Turbine Dismanding	Disassemble turbine components								
4	Turbine Removal	Transport of all turbine components off site								
5	Cable Removal	Remove Underground cables from ducting								
6	Solar Array Decommissioning	Disconnect power ouput								
7	Solar Array Removal	Disassemble and transport of all solar array components off site								
8	Turbine foundations backfill	Reinstate foundation areas by covering with soil material								
9	Accomodation Areas Reinstatement	Reinstate soil berm and boundary treatments								

Figure 5-1 Indicative Decommissioning Schedule



# MITIGATION PROPOSALS

All mitigation measures relating to the pre-commencement, construction and operational phases of the Proposed Development were set out in the various sections of the EIAR and NIS prepared as part of the planning permission applications to ABP, KCC and CCC.

This section of the Decommissioning Plan groups together all of the mitigation measures presented in the above documents. The Mitigation Measures are presented in Table 6-1 below.

By presenting the mitigation proposals in the below format, it is intended to provide an easy to audit list that can be reviewed and reported on during the decommissioning phase of the project.



Table 6-1 Mitigation Measures

Ref.	Reference Location	Mitigation Measure	Audit Result	Action Required			
	Decommissioning Phase						
MM1	EIAR Section 4	Prior to the end of the operational period the Decommissioning Plan will be updated in line with decommissioning methodologies that may exist at the time and will agreed with the competent authority at that time.					
MM2	DP Section 3	Prior to decommissioning, a suitably qualified ecologist will complete an invasive species survey of the source material used for the site reinstatement works. The invasive species survey will also be undertaken along the cable route to identify invasive species at joint bay locations where excavation to expose the cabling for removal will be required.					
MM3	EIAR Section 4  DP Section 3  NIS Section 6	The effectiveness of drainage measures in the natural drainage regime that will have resumed by the time of decommissioning will be monitored continuously by the ECoW or supervising hydrologist on-site. The ECoW or supervising hydrologist will respond to changing weather, ground or drainage conditions on the ground as the project proceeds, to ensure the effectiveness of the drainage design is maintained in so far as is possible. This may require the installation of additional check dams, interceptor drains or swales as deemed necessary on-site.					
MM4	EIAR Section 4  DP Section 3	The following mitigation measures are proposed to avoid release of hydrocarbons at the site:  Road-going vehicles will be refuelled off site wherever possible; On-site refuelling will be carried out at designated refuelling areas at various locations throughout the site. Machinery will be					



Ref.	Reference Location	Mitigation Measure	Audit Result	Action Required
		refuelled directly by a fuel truck that will come to site as required  Only designated trained and competent operatives will be authorised to refuel plant on site.  Fuel volumes stored on site should be minimised. Any fuel storage areas will be bunded appropriately;  The plant used will be regularly inspected for leaks and fitness for purpose; and,  An emergency plan for the decommissioning phase to deal with accidental spillages will be developed (refer to Section 4) Spill kits will be available to deal with and accidental spillage in and outside the refuelling area.  A programme for the regular inspection of plant and equipment for leaks and fitness for purpose will be developed at the outset of the decommissioning phase.		
MM5	EIAR Section 13 DP Section 3	A Traffic Management Plan will be prepared in advance of any decommissioning works. The removal of development components from site will be undertaken by a specialist haulier. The traffic management arrangements will be agreed in advance of decommissioning with the competent authorities Kerry and Cork County Councils.		



# 7. MONITORING PROPOSALS

All monitoring proposals relating to the construction and operational phases of the Proposed Development were set out in the various sections of the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) which accompanies this application.

This section of the DP groups together all of the monitoring proposals presented in the planning documentation. The monitoring proposals are presented in Table 7-1 below.

By presenting the monitoring proposals in the below format, it is intended to provide an easy to audit list that can be reviewed and reported on during the operational phase of the project. The tabular format in which the below information is presented, can be further expanded upon during the course of operation to provide a reporting template for site compliance audits



Table 7-1 Schedule of Monitoring Proposals

Table 7-1 S	cheaule of Monitoring I	Hupusais							
Ref. No.	Reference Location	Monitoring Measure	Frequency	Reporting Period	Responsibility				
	Decommissioning Phases								
MX1	DP Section 3	Prior to decommissioning, a suitably qualified ecologist will complete an invasive species survey of the source material used for the site reinstatement works and the junction upgrade adjacent and along the cable route to identify invasive species at joint bay locations where excavation to expose the cabling for removal will be required.	As required	As required	Project Ecologist				
MX2	DP Section 3	The Site Manager in consultation with the ECoW will be responsible for employing the services of a suitably qualified ecologist and any other suitably qualified professionals as required throughout the decommissioning works.	As required	As required	Site Manager				
MX3	DP Section 3	In general, the ECoW will maintain responsibility for monitoring the decommissioning works and Contractors/Sub-contractors from an environmental perspective. The ECoW will act as the regulatory interface on environmental matters. The Site Manager will be responsible for reporting to and liaising with Kerry and Cork County Councils and other statutory bodies as required	As required	As required	ECoW/ Site Manager				
MX4	EIAR Section 8	Regular inspections of all installed drainage systems will be undertaken, especially after heavy rainfall, to check for blockages, and ensure there is no build-up of standing water in parts of the systems where it is not intended	As Required	Weekly	ECoW				
MX5	CEMP Section 3	Training and supervision of drivers to ensure smooth machinery operation/driving, and to minimise unnecessary noise generation during the decommissioning phase.	As Required	As Necessary	ECoW				



Ref.	Reference Location	Monitoring Measure	Frequency	Reporting Period	Responsibility
MX6	CEMP Section 4	Daily general visual inspections of site operations and inspections of all watercourses within the site and in the surrounding area by the ECoW or a suitably qualified and competent person as delegated by the ECoW	Weekly / As Required	As Necessary	ECoW



8.

### **COMPLIANCE AND REVIEW**

## 8.1 Site inspections and Environmental Audits

Routine inspections of decommissioning activities will be carried out on a daily and weekly basis by the ECoW and the Site Supervisor/Construction Manager to ensure all controls to prevent environmental impacts, relevant to the decommissioning activities taking place at the time, are in place.

Environmental inspections will ensure that the works are undertaken in compliance with this Decommissioning Plan and all other planning application documents. Only suitably trained staff will undertake environmental site inspections.

### 8.2 **Auditing**

An Environmental audit will first be carried out prior to the decommissioning phase of the Proposed Development to ensure the construction and/or operational phase mitigation measures that are still in place as required are adequate. Further environmental audits will be carried out on a monthly basis during the decommissioning phase of the project and on completion of the decommissioning works.

In contrast to monitoring and inspection activities, audits are designed to shed light on the underlying causes of non-compliance, and not merely detect the non-compliance itself. In addition, audits are the main means by which system and performance improvement opportunities may be identified. Environmental audits will be carried out by the ECoW on behalf of the appointed contractor. It is important that an impartial and objective approach is adopted. Environmental audits will be conducted at planned intervals to determine whether the Decommissioning Plan is being properly implemented and maintained. The results of environmental audits will be provided to project management personnel.

### 8.3 **Environmental Compliance**

The following definitions shall apply in relation to the classification of Environmental Occurrences during the decommissioning of the wind farm:

**Environmental Near Miss:** An occurrence which if not controlled or due to its nature could lead to an Environmental Incident.

**Environmental Incident:** Any occurrence which has potential, due to its scale and nature, to migrate from source and have an environmental impact beyond the site boundary.

**Environmental Exceedance Event**: An environmental exceedance event occurs when monitoring results indicate that limits for a particular environmental parameter (as indicated in the Environmental Monitoring Programme) has been exceeded.

An exceedance will immediately trigger an investigation into the reason for the exceedance occurring and the application of suitable mitigation where necessary.

Exceedance events can be closed out on achieving a monitoring result below the assigned limit for a particular environmental parameter.

**Environmental Non-Compliance:** Non-fulfilment of a requirement and includes any deviations from established procedures, programs and other arrangements related to the Decommissioning Plan.



### 8.4 Corrective Action Procedure

A corrective action is implemented to rectify an environmental problem on-site. Corrective actions will be implemented by the Site Supervisor/Construction Manager, as advised by the Site Environmental Clerk of Works. Corrective actions may be required as a result of the following;

- Environmental Audits;
- > Environmental Inspections and Reviews;
- Environmental Monitoring;
- Environmental Incidents; and,
- Environmental Complaints.

A Corrective Action Notice will be used to communicate the details of the action required to the main contractor. A Corrective Action Notice is a form that describes the cause and effect of an environmental problem on site and the recommended corrective action that is required. The Corrective Action Notice, when completed, will include details of close out and follow up actions.

If an environmental problem occurs on site that requires immediate attention direct communications between the Site supervisor/Construction Manager and the ECoW will be conducted. This in turn will be passed down to the site staff involved. A Corrective Action Notice will be completed at a later date.

### 8.5 **Decommissioning Phase Plan Review**

This Decommissioning Plan will be updated and reviewed prior to commencement of decommissioning works. Further updates will be completed to the plan during decommissioning works to adapt to specific situations that are encountered that need to be considered by the plan. This decommissioning plan is informed by the Scottish Natural Heritage report (SNH) *Research and Guidance on Restoration and Decommissioning of Onshore Wind Farms* (SNH, 2013)