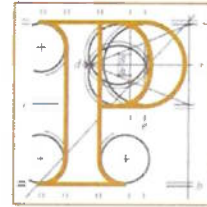


**Our Case Number:** ABP-319023-24



An  
Bord  
Pleanála

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

**Date:** 19 September 2024

**Re:** Combined Cycle Gas Turbine and Open Cycle Gas Turbine Thermal Power Plant, Electricity Grid Connection including 2 no. substations, and associated buildings, plant, site works, service and ancillary development on land within the townlands Knockdrin, Derrygreenagh, Derryarkin, Derryiron, Ballybeg, Coolcor, Barrysbrook, Clonin, Togher and Coole, Co. Offaly. ([www.derrygreenaghpowerplanning.ie](http://www.derrygreenaghpowerplanning.ie))

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

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

**Teil**  
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**Facs**  
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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)

Strategic Infrastructure Development  
An Board Pleanála  
64 Marlborough Street  
Dublin 1

By Email to: [sids@pleanala.ie](mailto:sids@pleanala.ie)

Our Ref: PAR 4351

Thursday, 12 September 2024

**Re: Strategic Infrastructure Development ABP – 319023-24; Further information ref. 237501.0530RR01a received 20/08/2024 for proposed Combined Cycle Gas Turbine (570MW) and an Open Cycle Gas Turbine (140MW) Thermal Power Plant and electricity grid connection including 2 no substations and associated buildings, plant, site works services and ancillary development on land within the townlands of Knockdrin, Derrygreenagh, Derryarkin, Derryiron, Ballybeg, Coolcor, Barrysbrook, Clonin, Togher and Coole, Co. Offaly.**

Dear Sir / Madam,

I am writing to you in response to a request for technical advice in relation to the above development, received on 20<sup>th</sup> August 2024.

The Health and Safety 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 in response to a notice sent under Article 215 of the Planning and Development Regulations 2001-2021.

Under Regulation 24(2) of S.I. 209 of 2015, the technical advice on the effects of a proposed development on the risk or consequences of a major accident relates to the following types of developments within the consultation distance for an establishment:

- (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 advice given is for the purposes of assessing a new development only. A full explanation of the Authority's Land-use Planning advice system can be found at:

[https://www.hsa.ie/eng/Your\\_Industry/Chemicals/Legislation\\_Enforcement/COMAH/Land\\_Use\\_Planning/](https://www.hsa.ie/eng/Your_Industry/Chemicals/Legislation_Enforcement/COMAH/Land_Use_Planning/)

Appendix 16.3 of the EIAR [document Ref. 237501.0530RR01a dated 03/07/2024] - was reviewed by the Authority. The Health and Safety Authority can confirm, from the details received, that the development will constitute a new lower tier COMAH establishment.

However, further clarifications on the above referenced document are required before the Authority can provide technical advice relating to this proposed development. These clarifications are contained in Appendix 1 to this letter.

If you have any queries, please contact the undersigned.



**Noreen Quinn**  
**Inspector,**  
**COMAH, Chemical Production & Storage (CCPS)**

**Encl:**  
**Appendix 1**  
**Note on the Approach of the HSA to the Provision of Land-use Planning Advice**

## **Appendix 1**

To note: the following items for clarification are not listed in order of importance and some comments about modelling assumptions/approaches apply each time such scenarios are considered.

1. Confirm the correct document has been submitted as the original date of issue is different to that on the revised document submitted in response to the Authority's request for further information.
2. Note any change to the design/layout/operation as set out in this planning application, including the use of hydrogen or a hydrogen blend, will need assessment in advance of the change, in compliance with the requirements of Regulation 12 of the COMAH Regulations.
3. Fig 1 site boundary [red line indicating proposed planning application site boundary] is different to fig. 2 COMAH boundary. Also, the site boundary indicated in Appendix 16.3 of EIA is different to that on the proposed development site location map sheet 1 of 8. Ref. S7060-8050-0040-1Rev 1.0. All operations and activities associated with the COMAH site must be incorporated within the COMAH site boundary. Further clarification on this boundary is required.
4. Following on from the point above, Fig. 2 site layout does not provide sufficient detail. No site entrance or exit locations are marked, all buildings are to be identified, two tanks beside the raw water tank are not identified, no legend is included for the red & blue lines - revise report to include all items listed.
5. Confirmation that all existing buildings at the location will either be demolished or repurposed within the COMAH establishment, is required. Further, any existing buildings that may remain should be identified on the site map and use and occupancy provided.
6. Section 5.1 of Appendix 16.3 EIA table 13 lists a number of major accident scenarios, there is no discussion or reference to elsewhere in the document how this sub-set of scenarios has been determined. Provide a detailed description and include HAZID tables or similar, to demonstrate that a systematic method of hazard identification has been applied. It should also set out what criteria has been used to determine the final sub-set of major hazard accident scenarios that could occur at the site – revise report to demonstrate that the subset of major accident events considered in the report are correct.
7. Section 6.7.6 of Appendix 16.3 EIA hydrogen pipeline release event frequencies states it follows the TLUP guidance, however in table 62 the calculated event frequencies do not follow TLUP sc. 3.4.3 w.r.t. 100% ignition, 30 % prob of delayed / 40 % prob of VCE instead of flash fire - revise report with correct immediate / delayed jet/VCE/Flash fire probabilities. Further, immediate ignition results for hydrogen events also need to be set out in this section of the report and included in the risk calculation in accordance with TLUP sc. 3.4.3.
8. Regarding the LPG scenarios in sections 6.5.14 and 6.5.15. The hot BLEVE scenario should also consider thermal radiation risks from the fireball, which are generally more significant than the overpressure risks this has not been considered and refer to TLUP table 18 [pool fires] surface emissive power (SEP) for LPG is set at 250 , note max SEP to be used for jet fires. TLUP sets a specific SEP [sc. 2.11] of 275 kW/m<sup>2</sup> for BLEVES – revise report.
9. In section 6.5.16 table 49 RT event frequency all the hose frequencies are incorrect. The failure rates given in section 3.1.2 TLUP are per hour, not per year – revise report.
10. Section 6.5.16 Table 49 RT event frequency for a hot BLEVE frequency is incorrect. The failure rate in section 3.1.2 TLUP is per hour, not per year – revise report.
11. Explanation of how the various types of events described in Section 6 have been characterised in RiskCurves to get the final risks is required, this cannot be verified [as noted in other points there is more than 1 turbine, LPG tank on site, therefore the report must clearly show that the total frequency has been applied in the risk calculation] – revise report.

12. In section 8 there should be a consideration of societal risk, if only to say why an assessment has not been undertaken. Further, in section 8 (and elsewhere). There should be more detailed consideration of the risk at the R400 road, and why it is considered acceptable. The report identifies a number of flash fires and VCE events that impact the road, but it says that this would only cause injury, not fatality – this needs clear justification and describe exactly what are the most significant risk events at the R400 road – revise report.
13. Appendix 16.3 Section 7.7.1 It is noted that the frequency of a MATTE event takes account of the total frequency as  $2.5 \times 10^{-5}$  per year based on the number of tanks, yet the cumulative frequency for all other scenarios in the report does not, e.g. total number of turbines onsite, the risk is calculated as per turbine – revise report and calculate risk as stated in points above.

### **Note on the Approach of the HSA to the Provision of Land-use Planning advice.**

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 in response to a notice sent by a planning authority under Part 11 of the Planning and Development Regulations 2001-2015. Under Regulation 24(2) of S.I. 209 of 2015, the technical advice on the effects of a proposed development on the risk or consequences of a major accident relates to the following types of developments within the consultation distance for an establishment:

- (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 advice given is for the purposes of assessing new development only. A full explanation of the Authority's Land Use Planning advice system can be found at [https://www.hsa.ie/eng/Your\\_Industry/Chemicals/Legislation\\_Enforcement/COMAH/Land\\_Use\\_Planning/](https://www.hsa.ie/eng/Your_Industry/Chemicals/Legislation_Enforcement/COMAH/Land_Use_Planning/)

Your attention is drawn to Regulation 24(3) of S.I. 209 of 2015:

*(3) The technical advice provided by the Central Competent Authority to a planning authority pursuant to paragraph (2) may be generic or case specific in nature and shall be so formulated that it will assist the planning authority to take into account the need, in the long term—*

- (a) to maintain appropriate safety distances between establishments covered by these Regulations and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes;*
- (b) to protect areas of particular natural sensitivity or interest in the vicinity of establishments, where appropriate through appropriate safety distances or other relevant measures; and*
- (c) for the operator to take additional technical measures, in the case of existing establishments, in accordance with Regulation 7, so as not to increase the risks to human health and the environment.*

In giving its advice, the Authority does not deal with routine emissions. Such emissions will be subject to EPA or Local Authority scrutiny and control.

The operator of an establishment covered by S.I. 209 of 2015 is also required to take all necessary measures to prevent major accidents occurring and to limit the consequences of any such major accidents for human health and the environment.