MOTT MACDONALD

Shelburne Energy Farm

Sediment, Erosion and Pollution Control Plan

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Issue and Revision Record

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Contents

1 Introduction

1.1 Background

Mott MacDonald Ireland Limited was appointed by Gen7 Renewable Energy Limited (Gen7) to prepare an Environmental Impact Assessment Report (EIAR) to accompany planning applications to the relevant planning authorities for a renewable energy development referred to as Shelburne Energy Farm.

In summary, the development at Shelburne Energy Farm is a solar photovoltaic farm with an accompanying and co-located battery energy storage system. The project description is detailed fully in the EIAR which was submitted to accompany the planning application.

1.2 Purpose

Following submission of the planning application, Wexford County Council (WCC) reviewed the relevant documentation and made several requests for information (RFI) to clarify certain matters. The purpose of this Sediment, Erosion and Pollution Control Plan document is to address WCC's RFI no. 4a which is worded as follows:

"4. The applicant is required to submit the following reports which have been referenced within the NIS, EIAR and other planning particulars, however have not been included within the planning application:

a. Sediment Erosion and Pollution Control Plan (which was to form part of the CEMP)."

The information set out in this Sediment, Erosion and Pollution Control Plan (SEPCP) document compliments proposed measures set out in the Construction and Environmental Management Plan (CEMP). The SEPCP will remain a 'live' document and will be reviewed regularly and revised, as necessary, to ensure that the measures implemented are effective for proposed works. The measures will be agreed with the local authority prior to commencement of construction works.

A Water Quality Management Plan (WQMP) document has been prepared separately and should be read in conjunction with the SEPCP document.

The SEPCP includes measures to manage soil and silt-laden water on site, accidental leaks/spills to ground to ensure compliance with environmental quality standards specified in the relevant legislation. It also specifically deals with the potential impacts of material deposition areas during the construction phase of the project. The measures will be implemented by the contractor at the relevant stages of the proposed works.

2 Sediment, Erosion and Pollution Management

2.1 Site management

The following measures will be implemented prior to commencement and throughout the duration of the proposed works.

- A full-time on-site Environmental Clerk of Works (EnCoW) will be appointed prior to commencement of works.
- The Emergency Incident Response Plan and environmental control and mitigation measures described in the CEMP will be agreed prior to construction with the local authority.
- A Water Quality Management Plan (WQMP) document has been prepared, which compliments the CEMP and SEPCP. The WQMP will remain a 'live' document and will be reviewed regularly and revised, as necessary, to ensure that the measures implemented are effective for all construction works.
- All pollution control measures will be designed, installed, and maintained in accordance with CIRIA guidance for 'Environmental Good Practice on Site' (C741) and 'Control of water pollution from linear construction projects. Technical guidance' (C648).
- A Resource and Waste Management Plan (RWMP) document has been prepared to support the CEMP for this Proposed Project. The RWMP will remain a 'live' document and will be reviewed regularly and revised, as necessary, to ensure that the measures implemented are effective for all construction works. The RWMP will ensure that waste generated during the project will be managed in a way that ensures the relevant provisions of the Waste Management Act 1996 and associated amendments and regulations are met, particularly with regard to the use of appropriately permitted Waste Contractors and destinations for waste materials.

2.2 General site arrangements

The following mitigation measures will be implemented prior to commencement and throughout the duration of the proposed works.

- Re-instatement method statements will be subject to approval by the EnCoW.
- Works will not be carried out during extreme rainfall or high flows events. Met Éireann provides 5-day weather forecasts on its website (www.met.ie) and works will not take place at least during yellow, amber, and red weather warnings as monitored by the onsite EnCoW.
- An early flood warning system will be set up to allow the removal of plant and material from construction areas located in Flood Zones A and B in the event of a flood warning. The duration of works within Flood Zone A and B will be minimised to reduce the potential of impact.
- In the case of a warning of a flood event, plant and materials vulnerable to flooding in 'at risk' construction compounds will be relocated to parts of the compound that are considered to be not at risk of flooding.
- Activities will be planned in advance and machinery will be managed to ensure that the number of trips is limited to the minimum required at each location i.e. the more times a piece of ground is tracked, the more likely it is that vegetative cover will be removed and ruts will be created that will act as miniature rivers where dirty water will flow.

- A buffer zone of 15m will be maintained where possible, between storage and working areas and drainage ditches, taking account of the minimum working area required to facilitate the works.
- Temporary works will be designed so as not to increase flood risk elsewhere from overland flow, by limiting excavated lengths and providing suitable drainage provision.
- Tracking beside drains will be avoided as far as possible to avoid damage to the bankside.
- The time period over which areas of clearance are left open will be reduced insofar as is reasonably practicable.
- All temporary construction compounds will be secured with hoarding/fencing around the compound perimeters as appropriate.
- Temporary facilities will be provided at the construction compounds including construction phase car parking and welfare facilities and temporary material storage areas as necessary. Any discharges from temporary welfare facilities will be connected to a sealed holding tank to be emptied and disposed of off-site by a licensed contractor to an approved licenced facility.

2.3 Silt control measures

To manage soil- and silt-laden water on site, silt control measures will be used, as detailed below:

- Silt control measures, such as traps and fences, will be used to control silt generated from activities on site and prevent it gaining access to surface drainage which could convey silt to larger streams and watercourses.
- Silt traps can be located in small drains where flow is small.
- Silt fences can be located where runoff from large areas needs to be controlled; these will be installed in the working areas and not at the watercourse.
- Access routes will be delineated such that an appropriate set back distance from watercourses is maintained. Where works are to be undertaken adjacent to watercourses the setback distance will be delineated by the EnCoW on site.
- Where distances between the works and watercourse allow, a minimum setback distance of 30m from the watercourse will be maintained.
- Where the site is constrained, the best available set back distance will be employed taking account of the minimum working area required to facilitate the works.

2.3.1 Silt traps

The purpose of silt traps is to reduce the level of solids in the slowly flowing water. The silt trap works by allowing a build-up of water behind it slowing flow and allowing solids to settle out. The following requirements will apply:

- Silt traps will only be placed in drains downstream of working areas where the volume of water flow is expected to be low.
- Silt traps will be made of Terram or similar material, not mesh.
- The trap will be staked into the banks of the drain / watercourse such that no water can flow around the sides.
- The material will be bedded into the drain bed/watercourse to prevent water flowing beneath it
- The height of the trap will be lower than the bank heights. The upper edge will be fixed to a timber cross piece. This will allow water to overtop the silt trap and not burst through or around it.

- Inspections will be carried out daily; during the proposed works, weekly on completion of the works for at least one month, and after heavy rains, and monthly thereafter until bare areas have developed new growth.
- Any build-up of solids will be carefully removed without removing any vegetation growing on the bottom.
- In sensitive areas a series of silt traps will be placed in the drain.
- The silt trap will not be pulled from the ground but cutaway at ground level and posts removed.
- A record of when it was installed, inspected and removed will be maintained by the EnCoW

2.3.2 Silt fences

The purpose of silt fences is to prevent sediment from leaving disturbed areas by slowing surface runoff. The reduced flow allows soil particles to settle out before water passes through the permeable fabric, protecting nearby land and watercourses from sediment pollution.

- Silt fences will be installed downslope of the area where silt is being generated on disturbed ground.
- To be effective the silt curtain will contain the area where silt is generated and will terminate on high ground (i.e. an elevated area not in the watercourse).
- Silt fences will be constructed using a permeable filter fabric (e.g. Hy Tex Terrastop Premium silt fence or similar) and not a mesh.
- The base of the silt fence will be bedded at least 15-30cm into the ground at 2 metre intervals.
- Once installed the silt fence will be inspected by the EnCoW regularly, daily during the proposed works, weekly on completion of the works for at least one month, but particularly after heavy rains.
- The integrity of the silt fencing will be checked daily by the EnCoW and after poor weather conditions (rain or wind) and any failures rectified immediately.
- Two lines of silt curtain / fence will be installed, where considered necessary by the EnCoW.
- Any build-up of sediment along the fence boundary will be removed daily.
- Silt fences will be maintained until vegetation on the disturbed ground has re-established. Re-instatement method statements will be subject to approval by the EnCoW.
- The silt fencing will be left in place until the works are completed (which includes removal of any temporary ground treatment).
- Silt fences will not be removed during heavy rainfall.
- The silt fence will not be pulled from the ground but cutaway at ground level and posts removed.
- A record of when silt fences were installed, inspected and removed will be maintained by the EnCoW.

2.4 Temporary surface water management

Temporary surface water management arrangements are required during the works. The following measures will be put in place to mitigate the impact:

- Construction phase site drainage is designed to convey and attenuate pluvial surface waters through implementation of appropriately sized drainage systems including ditches, swales and settlement ponds.

- Drainage ditches will direct water into swales and settlement ponds for storage, attenuation and processing of pluvial surface water run-off.
- Permanent swales and drainage ditches will incorporate appropriately spaced outlets to reduce the volume of water in the drainage ditch or swale minimising erosion, check dams will also be installed at regular intervals within the drainage ditch (adjusted for slope).
- All site access tracks will be maintained to prevent the pooling of water, and have an adequate camber to allow drainage of surface waters to drainage ditches for conveyance.
- Areas of exposed soils will be maintained to prevent the pooling of water and allow for a drainage system to allow pluvial surface water to drain to a swale or settlement pond.
- The EnCoW will monitor the effectiveness of drainage system and advise contractors on improvements, additions and maintenance.

2.5 Dewatering

Dewatering may be required for some excavation works. The following measures will be put in place to mitigate the impact:

- Any water ingress associated with excavation works will be removed to facilitate suitable working conditions.
- The water will be over pumped and treated via a filter bag before being discharged within a vegetated area located north of the construction compound.
- Silt fences will be installed around the vegetated area to ensure there is no runoff of sediment laden surface water.
- Any contaminated water unsuitable to be discharged to ground will be removed and disposed of offsite.

2.6 Stockpiling materials

The stockpiling of materials will be required for some aspects of the works. The following measures will be put in place to mitigate the impact:

- All excavated material will be stored a minimum of 50m from rivers and any drainage ditches hydrologically connected to the watercourse.
- Silt fences or gravel drains will be positioned around the stockpiles to prevent surface water run-off. The silt fences and gravel drains will be regularly inspected and maintained.
- Stockpiled material, comprising soil, earth, stone etc. will be covered in order to prevent surface water run-off.

2.7 Concrete activities

The pouring of concrete will be required for foundation works. The following measures will be put in place to mitigate the impact:

- The contractor will schedule concrete works during relatively dry weather conditions (i.e. when there are no active Met Eireann yellow, orange or red warnings) to reduce the elevated risk of runoff.
- No pouring of concrete will be undertaken at the surface water outfall location.
- No on-site batching will be permitted at the proposed works areas. Concrete will instead be transported to the site within a concrete truck.

- Concrete will be brought to site by covered truck. Wet concrete operations adjacent to waterbodies will be avoided where possible.
- Quick setting concrete mixes will be used to reduce the risk of contaminated runoff to the nearby watercourses.
- The contractor's EnCoW will ensure that covers are available for freshly poured concrete to avoid wash off in the event of rain.
- Where the isolated working area requires constant pumping to maintain a dry works area, pumps shall be turned off during the pour, and remain off until concrete has hardened negating a runoff risk; and such that the discharge will not result in a change in pH of +/-0.5 units.
- Waste concrete slurry will be allowed to dry and taken to a licensed waste depot for disposal.
- Concrete trucks will be washed down within a designated wash down area within the construction compound only and will be washed into appropriately sized containers which shall be inspected for defects in advance. Where the container is defective it shall not be used.
- Concrete trucks will be washed down in a sealed mortar bin/skip which has been examined in advance for any defects. This requirement will be communicated to each concrete truck driver prior to entering into the works area.

2.8 Prevention of leaks / spills potentially causing pollution

In order to reduce the risk of contamination or pollution arising because of spills or leakages, measures including, but not limited to, the following will be employed.

- All collected waste will be managed in accordance with the Waste Management Act 1996, and associated Regulations
- Fuels, chemicals, liquid and solid waste will be stored on impermeable surfaces
- Chemical storage – all potentially polluting chemicals will be stored in secure weatherproof enclosures with spill kits
- Storage of fuel and refuelling will be undertaken within bunded hardstanding areas
- Refuelling of plant, equipment and vehicles will be carried out on impermeable surfaces
- All tanks and drums will be bunded in accordance with established best practice guidelines.
- Spill kits will be provided at all compound locations and carried by all crews during underground cable installation works.
- The site will be kept secure to prevent vandalism which can lead to pollution from stored liquids escaping and entering drains
- Bentonite Breakout procedure will be developed.
- Where mobile equipment is required, e.g. generators, these will be housed in a suitably sized bund/plant nappy such that any leaks/spills are intercepted. All mobile equipment used at the proposed discharge outfall will be stored within a plant nappy.
- All chemicals and hydrocarbons (oils, fuels and lubricants etc) should be stored in containers of up to 110% capacity to ensure there is a reduced risk of overflow spill and should be stored an absolute minimum of 10m from any watercourses and/or drains. If more than 200 litres of any oil type are to be stored on site, this must be stored in oil storage containers including drums and intermediate bulk containers (IBCs). All chemicals and hydrocarbons are to be stored within a bunded area, within the construction compound. All hand-held equipment and generators will be stored on site in appropriately sized bunds when not in use.

- Fuelling and lubrication of plant and equipment will be restricted to the construction compound site only. No refuelling will be permitted to occur within 10m of watercourses, waterbodies or drainage ditches.
- All waste fuels, oils, and other hazardous wastes will be disposed of in accordance with the requirements of the Waste Management Acts 1996, as amended.
- Spill-kits and hydrocarbon absorbent packs will be stored in the cabin of each vehicle and operators will be fully trained in the use of this equipment.
- Welfare/hygiene facilities will be located within temporary construction compounds a minimum of 50m from any watercourse/drainage ditch.
- All water from wheel washes will be removed from site and disposed of in line with Waste Legislation. No water will be discharged into any watercourses or drainage ditches

2.9 Management of accidental leaks / spills to mitigate pollution

In the event of leaks or spills occurring, in order to manage and reduce contamination risk, measures including, but not limited to, the following will be employed.

- All construction staff will be properly trained to respond to accidental discharge or leaks and appropriate spill management kits will be in place to allow rapid response on site.
- An Incident Response Plan will be in place detailing the procedures to be undertaken in the event of spillage of chemical, fuel or other hazardous substances or wastes, logging of non-compliance incidents and any such risks that could lead to a pollution incident at any point over the proposed working areas.
- Any spillages will be cleared immediately by excavating and disposing of affected soils in accordance with the Waste Management Act 1996, and associated regulations.

3 Conclusion

The purpose of this Sediment, Erosion and Pollution Control Plan (SEPCP) document is to address WCC's RFI no. 4a which is worded as follows:

"4. The applicant is required to submit the following reports which have been referenced within the NIS, EIAR and other planning particulars, however have not been included within the planning application:

a. Sediment Erosion and Pollution Control Plan (which was to form part of the CEMP)."

The information set out in this Sediment, Erosion and Pollution Control Plan (SEPCP) document compliments proposed measures set out in the Construction and Environmental Management Plan (CEMP). The SEPCP will remain a 'live' document and will be reviewed regularly and revised, as necessary, to ensure that the measures implemented are effective for proposed works. The measures will be agreed with the local authority prior to commencement of construction works.

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The SEPCP includes measures to manage soil and silt-laden water on site, accidental leaks/spills to ground to ensure compliance with environmental quality standards specified in the relevant legislation. It also specifically deals with the potential impacts of material deposition areas during the construction phase of the project. The measures will be implemented by the contractor at the relevant stages of the proposed works.

With the implementation of the proposed mitigation measures set out in this document, the Proposed Project will not result in a change in status of any WFD quality elements (groundwater or surface waterbody) or directly prevent the future attainment of good water status or indirectly impact measures that may be put in place by the relevant competent authorities to achieve the environmental objectives of the WFD.