

Mr. Gerry Costello
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01/07/2015

Reg. No: P0738-03

Re: Objection to the proposed determination of the Agency on a review application in respect of a facility at Bellanaboy Bridge Gas Terminal, Bellanaboy Bridge, Bellagelly South, County Mayo, Reg No. P0738-03.

Dear Mr. Costello

I refer to your application for a licence review for the facility located at Bellanaboy Bridge Gas Terminal, Bellanaboy Bridge, Bellagelly South, County Mayo, Reg. No. P0738-03, and in particular to the requests for an oral hearing in relation to the objections to the proposed determination.

I am to advise that, having considered the requests, the Board of the Agency decided on 16 June 2015 that it would not be appropriate in this case to hold an oral hearing.

The reasons for the decision not to hold an oral hearing are as outlined in the attached Inspector's Report dated 10 June 2015, which is also available to view on our website.

In light of this decision the Board of the Agency wishes to assure you that the refusal of the requests for an oral hearing does not mean that your objection will receive any less consideration than where a hearing is granted. They also wish to advise that the technical committee will deal with your objection in a professional and impartial manner.

The technical committee will prepare a report and recommendations having taken into account all the issues raised in your objection. The Board of the Agency will consider your objection together with the report and the recommendations of the technical committee before making a final decision. This decision will be made as soon as possible and without undue delay. Once the final decision is made you will be notified at the earliest possible date.

The decisions of the Agency are based on objective and independent evaluation of all the issues raised by all parties to a licence application. The Agency is committed to openness, fairness and transparency in its decision making process and I can assure you that you will have access to all documentation in relation to this licence application including the report and recommendations of the technical committee.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Noeleen Keavey', written in a cursive style.

Noeleen Keavey

Environmental Licensing Programme

Office of Climate, Licensing & Resource Use



OFFICE OF CLIMATE, LICENSING &
RESOURCE USE

This Report has been cleared for submission to the Board by the Programme Manager, Frank Clinton
Signed: *Frank Clinton* Date: 10/06/2015

ENVIRONMENTAL LICENSING PROGRAMME MEMO

TO: Directors

FROM: Jennifer Cope

- Environmental Licensing Programme

DATE: 10 June 2015

RE: Requests for Oral Hearing of objections on Proposed Determination Re: Shell E&P Ireland Limited, Bellanaboy Bridge Gas Terminal, Bellanaboy Bridge, Bellagelly South, County Mayo, Register No .P0738-03

I have assessed the objections to the proposed determination issued in relation to Shell E&P Ireland Limited, (Reg. No. P0738-03). The closing date for receipt of objections was 11 May 2015.

Eight objections on the Proposed Determination were received from the following:

1. Frances Micklem
2. Betty Schult
3. Ian Lumley, An Taisce
4. Peter Sweetman
5. Martin Harrington
6. Monica Muller
7. Gerry Costello, Shell E & P Ireland Limited
8. Eoin O'Leidhin and Paul Lynch

SCANNED

01 JUL 2015

The objections were received within the appropriate period and they:

- a) were submitted in writing
- b) provided a name and address of the objector
- c) included the subject matter of objections submitted
- d) were accompanied by the appropriate fee.

Two of the objections included a request for an oral hearing.

The requests for an oral hearing were made by:

- 1) Betty Schult (including 64 signatures) and
- 2) Eoin O'Leidhin and Paul Lynch (including 1,100 signatures).

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is essential for ensuring transparency and accountability in the organization's operations.

2. The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the need for consistent data collection procedures and the use of advanced analytical techniques to derive meaningful insights from the data.

3. The third part of the document focuses on the implementation of data-driven decision-making processes. It describes how data is used to identify trends, assess risks, and optimize resource allocation across different departments and projects.

4. The fourth part of the document addresses the challenges associated with data management and security. It discusses the importance of implementing robust security protocols to protect sensitive information and ensure compliance with relevant regulations.

5. The fifth part of the document provides a summary of the key findings and recommendations. It reiterates the importance of a data-centric approach and offers practical suggestions for improving data collection, analysis, and utilization within the organization.

The requests for an oral hearing are valid and the fee of €100 was submitted with each request. The original objections should be referred to for greater detail and further expansion of particular points.

Background Information

This licence review application, P0738-03, is a review of the current licence Register No. P0738-01, which, following an oral hearing, was granted on 12 November 2007. The licence (P0738-01) was technically amended (IED Amendment) on 06 January 2014 under Section 82A(11) of the EPA Act 1992, as amended, to bring it into conformity with the Industrial Emissions Directive (IED) (2010/75/EC). The Office of Environmental Enforcement received a letter on 12 November 2014, (dated 11 November 2014) to notify the EPA that the operation of the installation had commenced.

Reasons for Licence Review

The licensee requested a review of the licence to accommodate a number of proposed changes at the installation. The main changes proposed to the installation, and requested in the licence review application, are as follows:

1. A change to the location of the discharge point for treated produced water (SW3) from the licensed outfall just outside Broadhaven Bay to the subsea manifold located on the seabed (~350 m depth) in the Corrib Gas Field (65 km offshore). This requested change followed discussions with the Erris Inshore Fisherman's Association in 2008, during which Shell E&P Ireland Limited agreed to change the location of the discharge of treated produced water (SW3). Planning permission for this change was granted by Mayo County Council on 07 October 2010 (P10/633).
2. The removal of ambient monitoring requirements at the licensed outfall just outside Broadhaven Bay, as the treated produced water discharge (SW3) will no longer take place at this location.
3. The inclusion of Selective Catalytic Reduction abatement on the power generators to meet the NO_x limits specified in the current licence (Reg. No. P0738-01).
4. A new arrangement for surface water and groundwater drainage systems, which affects sampling and monitoring locations.
5. An increase in the emission limit value for suspended solids in storm water run-off (emission point SW2) from 5 mg/l to 30 mg/l.
6. A proposal to change the method of monitoring exhaust velocity from turbines, from utilising an air flow meter to a calculation method.

Objections

1) Objection No. 2 Betty Schult (including 64 signatures and five DVDs)

Concerns/issues raised in Objection No. 2 from Betty Schult include:

- Incidents that occurred during construction
- Compliance with conditions of planning
- Monitoring of Aluminium levels in the drinking water from Carrowmore Lake
- Test Flaring at the gas refinery.

2) Objection No. 8 Eoin O'Leidhin and Paul Lynch (including 1,100 signatures)

The objectors request an oral hearing "to comply with the principles of the Aarhus Convention".

Assessment

I have examined the objections associated with Objection No. 2 and Objection No.8 against the criteria outlined in the Agency publication on objections and oral hearings *Waste Management and IPPC Licensing – Aspects of Licensing Procedures: Objections and Oral Hearings* (2010). The matters to be considered in deciding on whether an oral hearing of objections should be held include the following:

1. New issues not previously raised that are specific to the location or the development.
2. The sensitivity of the location/local environment.
3. Whether it is a matter of national or regional importance.
4. The scale or complexity of the development.
5. Significant new information.

I consider that an oral hearing of the objections is not required in this case for the following reasons:

- (i) New issues not previously raised that are specific to the location or the development.

Comment: There are no new issues raised or data provided in the objections, relating to the location or the development, which could not be dealt with by a Technical Committee as effectively as if an oral hearing of objections was held.

- (ii) The sensitivity of the location /local environment.

Comment: No new issues or concerns in relation to the sensitivity of the location or of the local environment have been raised in the objections. All pertinent matters in relation to environmental sensitivity were dealt with in the oral hearing report dated 27th August 2007 for the current licence P0738-01. The main changes proposed to the installation in the review application of the licence are outlined above. Such matters as have been raised can be effectively addressed by a Technical Committee.

- (iii) Whether it is a matter of national or regional importance.

Comment: The installation is of national and regional importance, but the matters at issue are not complex and all pertinent matters were dealt with in the oral hearing report dated 27th August 2007 for the current licence P0738-01. Such matters as have been raised can be effectively addressed by a Technical Committee.

- (iv) The scale or complexity of the development.

Comment: The scale of the development is large scale, but it is not complex. An oral hearing was acceded to and carried out for the current licence P0738-01, which dealt with the scale of the development. The main changes proposed to the installation in the current licence review application are outlined above and are not complex and the scale of the development has not changed since the current licence

was granted (P0738-01). Such matters as have been raised can be effectively addressed by a Technical Committee.

(v) Significant new information.

Comment: No significant new information relevant to the licensing process has been raised by Ms Schult, which would merit an oral hearing.

In relation to Eoin O'Leidhin and Paul Lynch's request for an oral hearing, I note that the provisions of the Aarhus Convention are broken down into three pillars:

- access to information
- public participation and
- access to justice.

As part of the licensing process all submissions and objections are taken into consideration in the decision-making process, all objections are available on the EPA website and circulated to other objectors to allow that submissions on objections can be made. There is nothing new or significant referred to in this objection to merit an oral hearing. I consider that the objections can be fully and adequately assessed by a Technical Committee of the Agency and that the principles and objectives of the Aarhus Convention will be fully conformed with. Therefore, I do not consider that an oral hearing is required to deal with the matters raised in this objection.

Recommendation

I consider that the objections do not present significant new information or raise new issues, which would merit an oral hearing. I consider that the objections can be fully and adequately assessed by a Technical Committee of the Agency.

Signed: *Jennifer Cope*

Jennifer Cope

Dated: 10 June 2015

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice to ensure transparency and accountability.

2. The second part outlines the procedures for handling discrepancies between the recorded amounts and the actual cash flow. It suggests a systematic approach to identify the source of the error and correct it promptly to avoid any financial misstatements.

3. The third part details the process of reconciling the company's books with the bank statements. This involves comparing the ending balance of the cash account with the bank's records and investigating any differences to ensure that the company's financial statements are accurate.

4. The fourth part discusses the role of internal controls in preventing fraud and errors. It highlights the need for a strong internal control system that includes segregation of duties, regular audits, and a clear chain of command.

5. The fifth part provides a summary of the key points discussed in the document and offers recommendations for improving the company's financial management practices. It encourages the implementation of best practices and the continuous monitoring of the financial system.