# Gas Networks Ireland Limerick Gasworks Remediation Project EPA Licence Register Number W0281-01

# Status Update 31 July 2020

The Agency has received a large number of complaints from the public about odour, noise and dust problems caused by the Limerick Gasworks Remediation Project at Dock Road, Limerick City. The project is being undertaken by the site's owner, Gas Networks Ireland Ltd, under EPA Licence W0281, and involves the remediation of the former Coal Gas and Oil Gas manufacturing facility which operated on the site up until 1986.

The project involves excavating old structures containing coal tar residues, reinstating the site to a condition which is free of contamination and making it available for future use. The licence requires that the project be conducted in a manner that prevents offsite impacts on the local community or the adjacent environment.

#### Licence and licensed activities

The EPA granted waste licence W0281-01 to Gas Networks Ireland (GNI) on 13 August 2014 for the remediation of a 1.4-hectare, heavily contaminated former gasworks site at Dock Road, Limerick City.

Gas Networks Ireland's licence application, which is available on the EPA website at <a href="http://www.epa.ie/terminalfour/ippc/ippc-view.jsp?regno=W0281-01">http://www.epa.ie/terminalfour/ippc/ippc-view.jsp?regno=W0281-01</a>, acknowledges that the remediation works pose a significant risk of causing odour and dust impacts outside the site. Their Odour Management Plan includes a range of abatement technologies to control these risks, in the form of ground-level odour suppression mists at the boundary, directable water spray cannons, screens and stockpile covering, as well as operational practices to minimise odour and dust generation.

#### Site remediation activities

The first phase of the works, involving the recovery of liquid residues, was completed in 2018. The second phase, which involves binding the remaining coal tar residues to the soil, commenced in July 2019. The soil is excavated, screened and mixed with a binder before it is replaced on the site.

Works on the site have progressed steadily since July 2019, except for period between 27 March 2020 and 18 June 2020, when the site was closed under the Covid-19 restrictions.

Gas Networks Ireland completed extraction of contaminants from the last remaining structure on the site on 27 July 2020, and have now completed the highest odour-risk activities. At the time of this update, they are currently refilling that structure with cleaned material. After that, the remaining tasks are the removal of a stockpile of heavily contaminated material by ship for disposal abroad and redistribution of processed material over the site to leave a clean and

level surface. Gas Networks Ireland have indicated that this work will be completed before the end of August. At that stage, the site will be fully remediated, and will enter the aftercare period.

### **Complaints**

EPA received no complaints from the public throughout Phase 1 of the works, nor in the first months of Phase 2. However, since December 2019, we have received to date a total of 70 complaints, mostly about offensive gassy odour, but also about dust and noise from site activities. Many of the complainants have reported worries about possible health impacts because of the odours.

### EPA enforcement actions to date

In response to these complaints, we have carried out 26 odour assessments to date in the vicinity of the site, and detected odours outside the site boundary on 22 of these assessments. EPA has opened two Compliance Investigations into Gas Networks Ireland's control of odour and fugitive emissions.

During EPA site visits, we have confirmed that all of the excavation, mixing and relaying activities that are carried out as part of the remediation works have the potential to generate hydrocarbon odours on the site. These odours can cause offsite impacts if they are conducted in unfavourable weather conditions. In cases where we have determined that works are impacting residents and businesses around the site, we have instructed the licensee to cease activities that were causing these impacts. We will continue to do so as and when necessary to prevent offsite impact.

We are conducting continuous monitoring of a range of volatile substances likely to be present in emissions from the site and will continue to do so until the works have been concluded. Results of the monitoring to date indicate that concentrations of these substances are well below established Air Quality Standards for the Protection of Human Health. The latest report of this monitoring is pending, and will be published on this Page when it is available.

We are liaising with the Department of Public Health, HSE Mid-West about possible patterns of health effects that might be related to the odour and other emissions for the licensed site.

Gas Networks Ireland W0281-01 were named on the EPA's list of <u>National Priority Sites for</u> <u>Enforcement</u> on 16 July 2020.

The EPA continues to take firm enforcement action in line with our Enforcement Policy, available at <a href="http://epa.ie/enforcement/policy/">http://epa.ie/enforcement/policy/</a>, to ensure that Gas Networks Ireland achieves and maintains full compliance with their licence.

EPA are aware that the final phase of remediation activities that remain to be finished carry some risk of odour generation, though it is expected to be much less than the excavation

works which have already been completed. EPA will take action as necessary to minimise any potential for further offsite impacts during this final phase of the remediation project.

## Making Environmental Complaints

The Environmental Complaints section of the EPA website can be used to make complaints of an environmental nature using this Form:

#### Online Complaint Form

All complaints reported this way are captured by our internal enforcement system and are immediately viewable by enforcement inspectors. By using this method, you are guaranteed that your complaint will be received and acted upon quickly by the relevant enforcement team.