DOC-280921-GZN





Preliminary Site Assessment Report for Griffith Avenue, Dublin 9

ESB Site Ref: 6 Ballymun - Fairview 38kV

March 2020





Project Title:	ESB Networks Historic Fluid Filled Cable Loss Environmental Assessment		
Licence No:	N/A		
Project No:	52458		
Contract No:	52458 Stage 1		
Report Ref:	Stage 1 Preliminary Site Assessment Report for Griffith Avenue, Dublin 9. ESB Ref: 6 Ballymun - Fairview 38kV		
Status:	Final		
Client:	ESB Networks		
Client Details:	ESB Networks		
	Engineering & Major Projects		
	One Dublin Airport Central		
	Dublin Airport		
	Cloghran		
	Co Dublin		
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Document Production/Approval Record



LIMITATION

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This report is intended as a preliminary stage assessment of the site in question and, as such, all assessments and analysis of the environmental aspects of the site, whilst based of the best-available data and information, are theoretical and conservative in nature. Any risks identified within this report are entirely potential in nature and based on the most-conservative risk analysis scenario and the available information. This is inkeeping with best practice guidelines and does not necessarily reflect the actual environmental scenario on site. Further environmental information, as it becomes available, would likely change the assessments and analysis contained within this report.



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EXECUTIVE SUMMARY

This preliminary environmental site assessment consists of a review of the potential environmental impact associated with a suspected hydrocarbon leak from a power cable on Griffith Avenue, Dublin 9 (ESB Ref: 6 Ballymun – Fairview). There was another leak within 280m of this location on Griffith Avenue identified as ESB Site Ref: 5 Ballymun-Fairview. The reported data for these hydrocarbons insulating cable fluid leaks is combined. This report covers the leak at ESB Site Ref. 6 Ballymun – Fairview with the leak at Site Ref. 5 Ballymun-Fairview in a separate report.

This report is intended as a preliminary stage assessment of the site in question and, as such, all assessments and analysis of the environmental aspects of the site, whilst based of the best-available data and information, are theoretical and conservative in nature. Any risks identified within this report are entirely potential in nature and based on the most-conservative risk analysis scenario and the available information. This is in-keeping with best practice guidelines and does not necessarily reflect the actual environmental scenario on site. Further environmental information, as it becomes available, would likely change the assessments and analysis contained within this report.

There was an approximate volume of 5,170 litres of cable fluid consisting of linear alkyl benzene (LAB) lost to ground from the two leaks on Griffith Avenue at an approximate rate of 575 L/month for nine months. The leaks began in December 2017 and were repaired in August 2018.

The known leak point is located on the southern side of the roadway of Griffith Avenue which is a residential area. No physical evidence of hydrocarbon contamination was observed during a site walkover on the surface in terms of oil odours/staining or impact to vegetation. There is evidence of abundant site services near the ESB cable route.

The land in the area is zoned primarily for residential use with small areas of public open space.

The site is underlain by locally important (capable of suppling moderate groundwater yields) dark calp limestones of the Lucan Formation. GSI records indicate that the vulnerability is Low with thick (> 10 metres) low permeability till subsoils overlying the bedrock aquifer, which provide it with a good level of natural protection.

The nearest surface watercourse is the Tolka River located approximately 890m to the south. There are no groundwater wells or ecologically sensitive receptors located within a 1km radius of the site. Groundwater in the bedrock aquifer is likely to be semi-confined by the thick subsoils with the groundwater flow direction expected to be in a southerly direction following the topography of the area.

There are no hydrogeological pathways connecting the project area to the River Tolka or to protected areas occurring at and in the vicinity of the River Tolka Estuary at Dublin Bay.

At the time of reporting, Irish Water have examined all available drinking water quality sample data and have concluded that there is no evidence that COPCs from the leak site have infiltrated the Cork City drinking water supply. This evaluation is based on a review of all samples taken from customer-points, between 2014 and 2019; which showed no evidence that the COPCs (PAHs and Benzenes) were present in the water supply at levels above drinking water standards (PAHs: $0.1\mu g/L$; Benzene: $1.0\mu g/L$). These results (which are from samples taken at the customer tap) would not indicate that leaks from oil filled cables have contaminated the drinking water supply for these areas, or at least to an extent where any contamination arising has resulted in a breach of the parametric value for PAHs and Benzene (Appendix F).



Based on the known cable leak point, contaminants of potential concern (COPC) fate and transport and hydrogeological desk study information the CSM has the following initial key findings for human health and environmental risks;

There is a Low risk posed by LAB from contact with suspected contamination in soil and groundwater through;

- direct dermal/inhalation and ingestion contact to residents or other building users;
- dermal/inhalation and ingestion pathways to construction workers, which can be managed by appropriate use of PPE and H&S procedures;
- Leaching to shallow groundwater given the contaminant properties of low mobility and high sorption to soil, with shallow groundwater unlikely to be a viable groundwater resource in the residential urban setting.
- ingestion contact with suspected contamination in the soil and groundwater through permeation of contamination through plastic water pipes or through low-pressure infiltration of possible soil contamination into water pipes via nearby breaks or leaks;

There is a Low/Moderate risk posed by LAB in suspected contamination in the soil and groundwater through;

 hydrocarbon vapours in preferential pathways such as services ducts to residents or other building users.



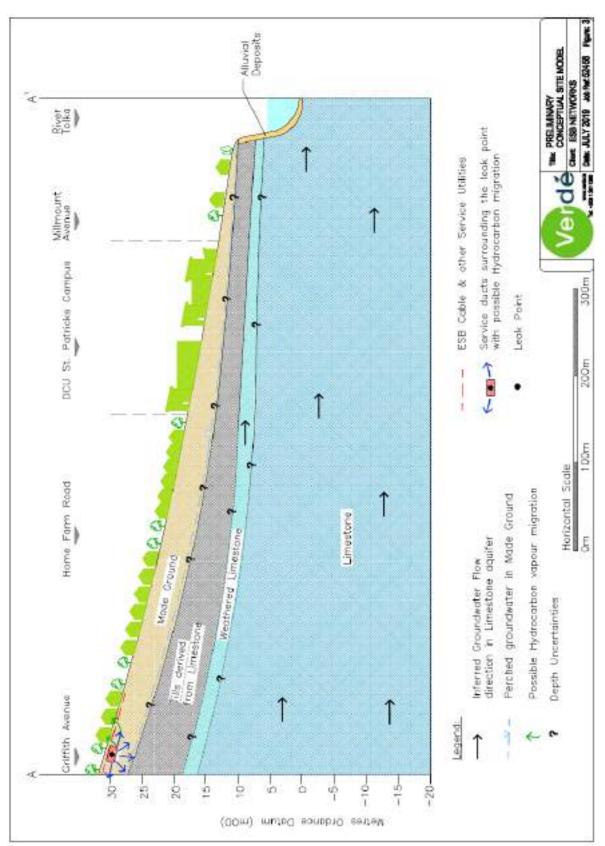


Figure 3 – Conceptual Site Model



G	EPA Contaminated Land & Groundwater Risk Assessment Methodology	Report Reference	Report Date	Status	
	STAGE 1: SITE C	HARACTERISATION	& ASSESSMENT		
1.1	PRELIMINARY SITE ASSESSMENT	Preliminary Report, Verde, Ref: 52458	6th March 2020	Final	
1.2	DETAILED SITE ASSESSMENT				
1.3	QUANTITATIVE RISK ASSESSMENT				
	STAGE 2: CORREC	CTIVE ACTION FEAS	IBILITY & DESIGN		
2.1	OUTLINE CORRECTIVE ACTION STRATEGY				
2.2	FEASIBILITY STUDY & OUTLINE DESIGN				
2.3	DETAILED DESIGN				
2.4	FINAL STRATEGY & IMPLEMENTATION PLAN				
	STAGE 3: CORRECTIVE ACTION IMPLEMENTATION & AFTERCARE				
3.1	ENABLING WORKS				
3.2	CORRECTIVE ACTION IMPLEMENTATION & VERIFICATION				
3.3	AFTERCARE				



1. INTRODUCTION

1.1. PROJECT CONTRACTUAL BASIS AND PERSONNEL INVOLVED

Verde Environmental Consultants, (Verde) was commissioned by ESB Engineering & Major Projects to undertake Preliminary Risk Assessments at six locations where there were suspected leaks of cable fluids. This report focuses on a hydrocarbon leak from a 38 kV power cable on Griffith Avenue, Dublin 9 (ESB Ref: 6 Ballymun – Fairview).

A site visit was undertaken by a Verde Hydrogeologist on 4th July 2019 to examine the area of the known cable leak point in relation to any observed evidence of contamination and surrounding land uses and sensitive human health and environmental receptors.

A site location map for the leak point is presented in Figure 1 with a detailed map on the cable route and leak location presented in an ESB map in Appendix A.

1.2. BACKGROUND INFORMATION

The ESB cable fluid acts as an electrical insulator and aids the conduction of heat away from the conductor allowing the cable to be run more efficiently. Fluid filled cables are largely located in urban/suburban areas and so are particularly vulnerable to third party interference or damage. Over time a cable can develop a leak due to corrosion / fracture/ defects in the cable sheath and in joints and terminations. When such leaks occur, there is potential for pollution to occur to surface water, groundwater, soils and ecology.

This preliminary environmental site assessment consists of a review of the potential environmental impact associated with a suspected hydrocarbon leak from a power cable on Griffith Avenue, Dublin 9 (ESB Ref: 6). There was another leak within 280m east of this location on Griffith Avenue identified as ESB Site Ref: 5 Ballymun-Fairview. Both leaks for Site Ref 5 & 6 commenced in December 2017. Site ref: 5 Ballymun-Fairview is the subject of a separate report. However, the reported volumes presented below for these hydrocarbon insulating cable fluid leaks is for both sites combined.

There was an approximate volume of 5,170 litres (I) of cable fluid consisting of linear alkyl benzene (LAB) lost to ground from the two leaks on Griffith Avenue at an approximate rate of 575I/month for nine months. The leaks were reported to have begun in December 2017 and were repaired in August 2018.

Details on the physical and chemical aspects of the hydrocarbon products used as Insulating Fluids in a power cable are discussed in Section 2.3 below.

1.3. PROJECT OBJECTIVES

The project objective was to determine the potential risks to human health and the environment at the leak locations and potential areas of impact. As requested by ESB, a risk-based approach has been. This risk based approach is also recommended in the best practice documents produced by the EPA on Management of Contaminated Land & Groundwater at EPA Licenced Sites published in 2013. Although the scope of this guidance specifically applies to licensed sites, the approach presented is consistent with UK and mainland European best-practice guidance in the assessment and management of potentially contaminated land. It is therefore considered to be a robust basis for the assessment of the subject site.



This report has been prepared in accordance with the EPA guideline reporting template for Preliminary Site Assessments under the EPA Contaminated Land & Groundwater Risk Assessment Methodology.

1.4. SCOPE OF WORKS

In order to complete the assessment and meet the objective of the brief the following scope of works was completed:

- A desk study review of available historical, geological and hydrogeological and environmental sensitivity information for the site. The desk study includes an assessment of historical land uses. Information on site utility services from various providers was examined together with detailed information on the cable route with a known leak point on the ESB cable, such as cable ends or joints.
- Site walkover to undertake a detailed site inspection to establish as much information as possible regarding site operations, activities and land use to include detailed site notes and photographs.
- Prepare a report in accordance with best practice guidance, in that the information gathered will be used to develop a preliminary conceptual model for the site.

1.5. SCOPE OF ANALYSIS AND CONCLUSIONS

This report is intended as a preliminary stage assessment of the site in question and, as such, all assessments and analysis of the environmental aspects of the site, whilst based of the best-available data and information, are theoretical and conservative in nature. Any risks identified within this report are entirely potential in nature and based on the most-conservative risk analysis scenario and the available information. This is in-keeping with best practice guidelines and does not necessarily reflect the actual environmental scenario on site. Further environmental information, as it becomes available, would likely change the assessments and analysis contained within this report.

As such, the reader is encouraged to view the findings, conclusions and recommendations contained within this report as the most-conservative, theoretically possible environmental scenario; and not necessarily the actual scenario currently persisting on the site question.



2. SOURCE AUDIT FINDINGS – PRODUCTION & OPERATIONAL HISTORY

2.1. CURRENT SITE OPERATIONS

The known leak point (ESB Ref: 6) is located on the southern side of the roadway of Griffith Avenue which is in a residential area consisting of detached and semi-detached houses, as presented in the site photographs in Appendix C.

There is a grass verge adjacent to the roadway and ESB cable route, inside which is a concrete footpath which was being replaced at the time of the site walkover. There was evidence of abundant site services in the roadway, the grass verge and concrete footpaths with manhole covers and traffic kiosk. Services in the area included sewers, road gully drains, water mains, telecom, UPC and ESB as in Photograph 2 in Appendix C.

The cable leak point area can be seen in an area of newer concrete as shown in Photograph 3 in Appendix C. There is no physical evidence of hydrocarbon contamination on the surface in terms of oil odours/staining or impact to vegetation with healthy looking trees and hedges.

Only a reported leak volume loss of 5,170 litres is available for both this site and the other repaired leak on the same roadway (ESB Ref: 5 Ballymun – Fairview). Consequently, the specific volume lost at leak point ESB Ref. 6 cannot be determined. Both leaks on this cable route were repaired in August 2018.

The known presence of permeable made ground around the power cable together with the presence of other underground services along the roadway indicates there is a high potential for preferential lateral migration from the leak point along the underground services routes.

2.2. PREVIOUS SITE OPERATIONS

This area of Dublin was undeveloped greenfield up to the early 1900's as shown in the historical desk study maps in Appendix B. Subsequent land use changed to a largely residential development on or before the 1940s and are as seen on-site today. The ESB power cable was installed in the area in 1950. Further details on the site history are presented in section 3.2.

2.3. CHEMICALS OF POTENTIAL CONCERN (COPC)

The fluid in the power cable is Linear Alkyl Benzene (T3788). MSDS for the fluids are included in Appendix D and further detail on their physical, fate and transport and toxicological properties provided below.

2.3.1 Linear Alkyl Benzenes

Linear Alkyl Benzene is a benzene compound with a side alkyl chain of 10-13 carbon atoms in length. The following presents relevant information on its Fate and Transport in the environment.

- low solubility, which means it doesn't mix with water easily;
- low to moderate volatility with the MSDS providing that the compound should not present an inhalation hazard under ambient conditions and that exposure to vapour or oil mists may irritate the mucous membranes and cause dizziness, headaches and nausea;



- Strongly absorbs to soil and combined with its low solubility means it generally has low mobility in the water environment;
- Its preference in soil will be to remain as free product or sorb to soil with a smaller proportion in the vapour phase;
- It will form a Light Non-Aqueous Phase Liquid (LNAPL) on water;
- It is readily biodegradable in both water and soil, with a half life in soils of 15.3 days and less than 28 days in water. Half-life is the time required for a quantity to reduce to half of its initial value (REACH database, 2011);
- Does not bio accumulate;
- The Predicted No Effect Concentration (PNEC) is the concentration of a chemical which marks the limit at below which no adverse effects of exposure in an ecosystem are measured. LAB is toxic to the water environment with a PNEC aqua (freshwater) of 0.001mg/l: PNEC soil terrestrial organisms of 0.329mg/kg and PNEC sediment of 1.65mg/kg for freshwater sediment and 0.165mg/kg for marine sediments (REACH database).



3. SITE ENVIRONMENTAL SETTING

3.1. GENERAL INTRODUCTION

The area of interest is an approximate 400m stretch of the road extending 200m east and 200m west from the intersection of Griffith Avenue and Valentia Road. The main land use in this area is residential with private gardens. Griffith Avenue also hosts the Office of the State Pathologist, Whitehall Garda Station, a Post Office delivery office, a number of schools and numerous commercial properties.

The land in the area is zoned primarily for residential use with small areas of public open space. There is an extensive volume of residential properties in the area as evident from aerial photographs and Dublin City Council Development Plan map, as presented in Appendix B.

The River Tolka is located approximately 890m to the south of the site flowing in an easterly direction eventually draining to Dublin Bay approximately 2.65km to the south east of the site. Under the Water Framework Directive, the River Tolka has been assigned a "Bad" status and has also been categorised as being at risk of deteriorating in the future, as presented in the Water Framework Directive River Body report in Appendix E.

The River Tolka flows into the South Dublin Bay and River Tolka Estuary SPA (Site Code: 4024). This SPA is located approximately 2.2km downstream of the nearest point of the River Tolka to the leak location. The South Dublin Bay River Tolka Estuary is designated as a SPA for its role in supporting a number of bird species.

According to the GSI database there are no groundwater wells located within a 1km radius of the site. There are two wells located approximately 1.3km of the leak point to the south west where there is a trial well and a production well in the townland of Glasnevin. The wells were drilled to depths of 90mBGL and 106mBGL respectively. Rock was encountered at an average depth of 13mBGL. The yield produced by the wells varies with poor and good yields reported in the trial well and an excellent yield of approximately 482m³/day reported in the production well. The current use of the well is unknown. There are no known domestic supply wells or groundwater drinking water protection areas in the vicinity of the site with water supply highly likely to be from the mains, as observed by the presence of water meters at the entrance to the residential properties.

3.2. SITE HISTORY

Primary sources used to research the history of the site included available extracts from historical Ordnance Survey Ireland (OSI) maps, aerial photographs and planning information from Myplan.ie.

The maps consulted include the OSI 6-inch historic maps from 1837 to 1842, the OSI 25-inch historical maps surveyed between 1888 and 1913 and the OSI 6-inch Cassini map surveyed in early 20th century. Table 3.2 below gives further details of the site history and the land use of the surrounding area.



Table 3.1 – Site History

History	National Monuments Service:		
	There are no monuments of significance within 1km of the area of interest.		
	Historic Mapping:		
	OSI 6 inch map (Black and White) (1837-1842):		
	From this map it is apparent that the road overlying the cable of interest has not yet been constructed. There is a road in place to the immediate east of the site which is in the location of the current Drumcondra Road Upper. The area of interest appears to be undeveloped green fields as does much of the adjoining land.		
	OSI 25 inch map (Black and White) (1888-1913):		
	This map appears to be similar to the previous map with notable changes as follows; The location of the current Drumcondra Road Upper east of the site is now marked as a "tramway" and there is a small housing development labelled as "Well Park" to the south of the site.		
	Cassini 6 inch (1830-1930):		
	The road layout in the map resembles that of current times. There is extensive hosing developments lining the roads in the area and a catholic church and an adjoining school marked in the area immediately south of the current location of the Corpus Christi Church which was constituted in approximately 1953.		
	The ESB power cable is reported to have been laid in the area in 1950.		
Aerial Photos	Aerial Photo 1995:		
	The road lay out and position of residential properties remains largely the same as present times. The Corpus Christi Church is present in its current position and layout.		
	Aerial Photo 2000:		
	The site and its immediate surroundings remain largely unchanged.		
	Aerial Photo 2005:		
	The site and its immediate surroundings remain largely unchanged.		
	Aerial Photo 2012:		
	The site and its immediate surroundings remain largely unchanged.		

3.3. REGIONAL GEOLOGY AND HYDROGEOLOGY

The site is underlain in dark calp limestones of the Lucan Formation (GSI) which is overlain of subsoils comprising of tills derived from limestones and made ground (Teagasc). The closets surface water course is the Tolka River located approximately 890m to the south of the site flowing in an easterly direction eventually draining to Dublin Bay approximated 2.65km to the south east of the site.

The following information sources were consulted as part of this desk based research and the relevant information has been compiled in Table 1 below.



- Dublin City Council (Planning and Environment Sections)
- Ordnance Survey of Ireland (historic map series)
- National Monuments Service (protected structures)
- Dept. of the Environment, Community and Local Government
- Geological Survey of Ireland
- Environmental Protection Agency data bases
- National Parks and Wildlife Services
- Office of Public Works (flood maps)

Table 3.2 – Site Physical Setting

Feature	Details & Comments	
Topography	The area of interest is relatively flat. The regional topography of the area slopes gently to the south toward Dublin Bay.	
Geology	Overburden: The GSI and EPA databases describe the soils at the site as Made Ground with the subsoils in the area consisting of tills derived from limestone. Solid Geology:	
	The site is underlain by calp limestones of the Lucan Formation. The Lucan Formation comprises dark-grey to black, fine-grained, occasionally cherty, micritic limestones that weather paler, usually to pale grey.	
Hydrogeology	Regional Classification:According to the GSI the Lucan Formation below the area of interest is classified as a Locally Important aquifer, bedrock which is moderately productive only in local zones. This type of bedrock aquifer unit is typically capable of supplying locally important abstractions (e.g. smaller public water supplies, group schemes), or 'good' yields (100-400 m³/d). Groundwater flow occurs predominantly through fractures, fissures and joints (secondary permeability) in a southerly flow direction towards the Tolka River.This type of aquifer typically has a limited and relatively poorly connected network of fractures, fissures and joints, giving a low fissure permeability which tends to decrease further with depth. A shallow zone of higher permeability may exist within the top few metres of more fractured/weathered rock, and higher permeability may also occur along fault zones. These zones may be able to provide larger 'locally important' supplies of water. 	



	Under the Water Framework Directive (WFD) the groundwater body beneath the site is Dublin Urban (code: IE_EA_G_005) and is classed as having Good status.
	Well Search:
	There are no groundwater wells located within a 1km radius of the site, as presented in the desk study maps in Appendix B. There are two wells located approximately 1.3km of the leak point to the south west of the site where there is a trial well and a production well in the townland of Glasnevin. The wells were drilled to depths of 90mBGL and 106mBGL respectively. Rock was encountered at an average depth of 13mBGL. The yield produced by the wells varies with poor and good yields reported in the trial well and an excellent yield of approximately 482m ³ /day reported in the production well. These wells are not located directly downgradient of the leak point.
Hydrology	Surface Water Courses/Abstractions:
	There is one surface watercourse within 1km of the area of interest. The River Tolka flows in an easterly direction approximately 890m to the south of the site draining into Dublin Bay approximately 2.65km to the southeast of the site.
Geotechnical	There have been no reported geotechnical significant investigations close to the area of the cable leak.
Protected	
	South Dublin Bay and River Tolka Special Protection Area (SPA)
Areas	South Dublin Bay and River Tolka Special Protection Area (SPA) The boundary of this Special Protection Area (SPA) (<i>site code: 004024</i>) is located approximately 2.71km to the south east of the project area. This SPA occupies a substantial part of Dublin Bay and comprises extensive intertidal flats which support wintering waterfowl which are part of the overall Dublin Bay population.
	The boundary of this Special Protection Area (SPA) (<i>site code: 004024</i>) is located approximately 2.71km to the south east of the project area. This SPA occupies a substantial part of Dublin Bay and comprises extensive intertidal flats which support wintering
	The boundary of this Special Protection Area (SPA) (<i>site code: 004024</i>) is located approximately 2.71km to the south east of the project area. This SPA occupies a substantial part of Dublin Bay and comprises extensive intertidal flats which support wintering waterfowl which are part of the overall Dublin Bay population.
	The boundary of this Special Protection Area (SPA) (<i>site code: 004024</i>) is located approximately 2.71km to the south east of the project area. This SPA occupies a substantial part of Dublin Bay and comprises extensive intertidal flats which support wintering waterfowl which are part of the overall Dublin Bay population. North Dublin Bay (SAC) The boundary of the North Dublin Bay Special Area of Conservation (SAC) (<i>site code: 000206</i>)
	The boundary of this Special Protection Area (SPA) (<i>site code: 004024</i>) is located approximately 2.71km to the south east of the project area. This SPA occupies a substantial part of Dublin Bay and comprises extensive intertidal flats which support wintering waterfowl which are part of the overall Dublin Bay population. North Dublin Bay (SAC) The boundary of the North Dublin Bay Special Area of Conservation (SAC) (<i>site code: 000206</i>) is located approximately 5.3km to the south east of the site.
	The boundary of this Special Protection Area (SPA) (<i>site code: 004024</i>) is located approximately 2.71km to the south east of the project area. This SPA occupies a substantial part of Dublin Bay and comprises extensive intertidal flats which support wintering waterfowl which are part of the overall Dublin Bay population. North Dublin Bay (SAC) The boundary of the North Dublin Bay Special Area of Conservation (SAC) (<i>site code: 000206</i>) is located approximately 5.3km to the south east of the site. Proposed Natural Heritage Area (pNHA) The boundary of the North Dublin Bay pNHA (<i>site code: 000205</i>) is located approximately

3.4. SITE GEOLOGY AND HYDROGEOLOGY

There is no site investigation data available from the site location.

The details of the typical cable and trench dimensions for a fluid filled cable include the following;

- Depth to the base of trench 1200mm
- Depth to top of cable 900mm-1000mm
- Thickness of sand surrounding a cable 350mm



- Width of trench 1100mm
- Backfill can be either arisings or Clause 804.

The permeable made ground is likely to contain perched groundwater which will be restricted from vertical migration by thick low permeability glacial tills. The thick low permeability tills are potentially in excess of 10metres thick as indicated by the Low Vulnerability GSI classification and therefore restricting migration to the underlying limestone bedrock aquifer, as presented in the conceptual site model in Figures 3 and 4. The groundwater in the underlying limestone bedrock aquifer is likely to be confined or semi-confined by the glacial tills.

The topography of the area as obtained from the GSI database show the leak point is located at approximately 30metres ordnance datum (mOD) with the Tolka River downgradient at approximately 10mOD. The topographic contours are orientated approximately east-west which infers that the groundwater flow direction is likely to be in a southerly flow direction, as presented in Figure 2 and within the CSM in Figures 3 and 4.

3.5. SUMMARY OF PREVIOUS SITE SAMPLING AND MONITORING DATA

The made ground within the cable trench is reported to be up to 1.2m deep and contained sand and backfill material. The underlying limestone derived glacial till is reported to be of low permeability with a thickness up to 10m.

At the time of reporting, Irish Water have examined all available drinking water quality sample data and have concluded that there is no evidence that COPCs from the leak site have infiltrated the Cork City drinking water supply. This evaluation is based on a review of all samples taken from customerpoints, between 2014 and 2019; which showed no evidence that the COPCs (PAHs and Benzenes) were present in the water supply at levels above drinking water standards (PAHs: $0.1\mu g/L$; Benzene: $1.0\mu g/L$). These results (which are from samples taken at the customer tap) would not indicate that leaks from oil filled cables have contaminated the drinking water supply for these areas, or at least to an extent where any contamination arising has resulted in a breach of the parametric value for PAHs and Benzene (Appendix F).

There is no available soil/vapour or groundwater quality information from the area in the vicinity of the cable leak point. There are no groundwater abstractions or monitoring wells in the vicinity of the leak point. A summary of the Environmental and Human Health Pollutant Linkages for the COPCs (TPH fractions, BTEX compounds, Speciated PAHs, SVOCs, VOCs) in relation to the known leak point details and available desk study information is summarised below.

For the COPC the following can be determined;

- Linear Alkyl Benzenes (LAB) is of low mobility and strongly absorbs to soil. It has low to moderate volatility and will remain largely as free product or sorb to soil/fill material. It is readily biodegradable in aerobic conditions and does not bio-accumulate.



4. SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

4.1. PRELIMINARY QUALITATIVE RISK ASSESSMENT (PQRA)

4.1.1 Risk Assessment Methodology

Currently there is no specific legislation addressing contaminated land in Ireland and therefore this report has been prepared considering the most relevant guidance published by the Irish Environmental Protection Agency (EPA) and the UK Environment Agency (EA) guidance, specifically as follows:

- 1. Guidance on the Management of Contaminated Land and Groundwater at EPA Licensed Sites, EPA 2013;
- Model Procedures for the Management of Land Contamination Contaminated Land Report (CLR 11), UK EA 2004.

Both approaches advocate a risk-based assessment when dealing with contaminated land and groundwater issues and this is considered as best practice.

Current surface water and groundwater pollution legislation is taken into account for these assessments as required under the Water Framework Directive, Directive 2000/60/EC, that was adopted in 2000 as a single piece of legislation covering rivers, lakes, groundwater and transitional (estuarine) and coastal waters and includes heavily modified and artificial waterbodies. Its objectives are to prevent further deterioration of and to protect, enhance and restore the status of all bodies of water with the aim of achieving at least good status.

It was given effect in Ireland under the European Communities (Water Policy) Regulations 2003 as amended, the European Communities Objectives (Surface Waters) Regulations 2009, as amended and the European Communities Environmental Objectives (Groundwater) Regulations 2010, as amended. These Water Policy Regulations govern the shape of the WFD characterisation, monitoring and status assessment programmes.

A critical element of the risk assessment process is the establishment of a Conceptual Site Model (CSM) for the land and groundwater environment. A CSM describes the potential sources of contamination at a site, the migration pathways it may follow and the receptors it could impact. If complete source-pathway-receptor scenarios exist, then there is a potential pollutant linkage that needs to be characterised and assessed (via formal risk assessment). The CSM is updated as more information is gathered from subsequent desk studies and site investigations with a preliminary CSM presented in Figures 3 and 4.

4.2. OUTLINE SITE CONCEPTUAL MODEL

On the basis of the desk study and site walkover, a number of possible pollutant linkages have been identified for this site. Based on available information the outline site conceptual model is presented in Tables 4.1 below which considers possible pollutant linkages for the site.



Source	Pathway	Receptor	Potential Pollutant Linkage (Y/N)	Discussion
Human Health				
	LAB volatilisation from soil, groundwater and LNAPL into soil pore spaces (Vapour Phase in unsaturated soils), upward migration into houses & other properties to indoor air and then inhalation	Residents & other commercial or retail building users	Y	There are residential properties approximately 20m to the south and downgradient of the suspected leaks. Vapour phase migration will be preferential potentially along utility service runs and through more permeable made ground soils and or sand/gravel fractions of soils if present.
Historical leaks of cable fluid from underground electricity cable comprising of an approximate volume of 5,170 litres of linear alkyl benzene (LAB) (Sites 5 & 6) Dec 2017 to August 2018.	LAB partitioning to soil (sorbed phase), groundwater (dissolved phase) and as NAPL (free phase). Then direct dermal contact/ingestion of soils and or dusts, inhalation of soil dusts / ingestion of home grown produce	Residents & other commercial or retail building users	Y	There are residential properties approximately 20m to the south and downgradient of the suspected leaks. The cable source of leak is at a depth of 0.9m and so direct contact and ingestion pathways are unlikely to be viable unless groundwater levels are near ground surface bringing contamination upwards into shallow soils where direct contact is possible.
PCOCs include: TPH fractions, BTEX compounds, Speciated PAHs SVOCs VOCs	LAB partitioning to soil (sorbed phase), groundwater (dissolved phase) and as NAPL (free phase). Then permeation through plastic potable water supply pipes and ingestion	Nearby residents	Y	The water supply pipes could potentially run through contaminated zones. LAB has the potential to permeate through the wall of plastic supply pipes and through joins and gaskets. An internet search has not identified proven instances where this has occurred elsewhere. Any permeating compounds would be diluted depending on water flows in the pipe. A WHO drinking water standard for hydrocarbons >C10 is 0.09mg/l which exceeds the LAB theoretical solubility limit of 0.041mg/l. So, unless NAPL is present within the pipe then this WHO drinking water standard would not be exceeded.

Table 4.1 – Outline Site Conceptual Model (Environmental and Human Health)



	LAB volatilisation from soil, groundwater and LNAPL into soil pore spaces (Vapour Phase in unsaturated soils), upward migration to outdoor air and then inhalation	Workers undertaking any subsurface works	Y	Unlikely to be significant as workers exposed in outdoor air where vapours cannot accumulate to high concentrations. Also, risks are localised areas of contamination which can be managed with the correct PPE and H&S procedures.
	LAB partitioning to soil (sorbed phase), groundwater (dissolved phase) and as NAPL(free phase). Then direct dermal contact/ingestion of soils and or dusts, inhalation of soil dusts	Workers undertaking any subsurface works	Y	Unlikely to be significant as contamination is likely to be localised and can be managed with the correct PPE and H&S procedures.
Environmental – Wat	er Receptors			
Historical leaks of cable fluid from underground electricity cable	LAB partitioning to soil (sorbed phase) and as NAPL in soil pore spaces, that then can leach downwards to groundwater in shallow made ground and glacial till soils	Shallow groundwater	Y	LAB present in soils as sorbed and NAPL phases can leach downwards with infiltrating rainwater and soil water movements to groundwater. In groundwater will form LNAPL due to low solubility. There may also be limited dissolved concentrations.
comprising of an approximate volume of 5,170 litres of linear alkyl benzene (LAB) (Sites 5 & 6) Dec 2017 to August 2018. PCOCs include: TPH fractions, BTEX compounds, Speciated PAHs SVOCs	LAB direct downward migration as NAPL until reaches shallow groundwater where forms LNAPL and with a limited dissolved plume based on low solubilities, then lateral migrations towards surface waters	River Tolka	N	The River Tolka is 890m south of the site and drains into Dublin Bay approximately 2.65km to the southeast of the site. Given the presence of glacial till underlying the project area and its capacity to limit the lateral migration of groundwater and that groundwater underlying the project area is likely to be perched at the base of made ground there is no potential for a hydrogeological pathway to connect the project area to the south.
VOCs	LAB migration downwards through glacial till to Limestone bedrock aquifer and then lateral migration	Limestone bedrock aquifer / Groundwater Users	N	There are no known recorded domestic groundwater abstraction wells located within a 1km radius of the suspected leaks. The surrounding properties



	are serviced by mains water. Additionally, downward contaminant migration into the limestone will be prohibited by depths of glacial till.
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4.3. POLLUTANT LINKAGE ASSESSMENT

As outlined in Tables 4.1 above a number of possible pollutant linkages were identified, which have been further risk assessed with reference to BS10175:2011 and CIRIA Document C552: Contaminated Land Risk assessment 'A Guide to Good Practice'. The risk assessment has been carried out by assessing the severity of the potential consequences, taking into account both the potential severity of the hazard and the sensitivity of the target, based on categories given in Table 4.2 below.

Table 4.2 - Potential Hazard Severity Definition

CATEGORY	DEFINITIONS							
Severe	Acute risks to human health, catastrophic damage to buildings, major risk to an environmental receptor such as a river							
Medium	Chronic risk to human health, pollution of sensitive environmental receptor, significant damage to buildings and structures.							
Mild	Pollution of non-sensitive waters, minor damage to buildings or structures							
Minor	Requirement for protective equipment during site works to mitigate health effects, damage to non- sensitive ecosystems or species							

The likelihood of an event (probability) takes into account both the presence of the hazard and target and the integrity of the pathway and has been assessed based on the categories given in Table 4.3 below.

Table 4.3 - Probability of Risk Definition

CATEGORY	DEFINITIONS						
High likelihood	Pollutant linkages may be present, and risk is almost certain to occur in long term, or there is evidence of harm to the receptor						
Likely	Pollutant linkage may be present, and it is probable that the risk will occur over the long term						
Low likelihood	Pollutant linkage may be present, and there is a possibility of the risk occurring, although there is no certainty that it will do so						
Unlikely	Pollutant linkage may be present but the circumstances under which harm would occur are improbable						



The potential severity of the risk and probability of the risk occurring have been combined in accordance with the following matrix in order to give a level of risk for each potential hazard, as presented in Table 4.4 below.

PROBABILITY OF RISK	POTENTIAL SEVERITY						
PROBABILITY OF RISK	Severe	Medium	Mild	Minor			
High likelihood	Very high	High	Moderate	Low/Moderate			
Likely	High	Moderate	Low/Moderate	Low			
Low likelihood	Moderate	Low/Moderate	Low	Very low			
Unlikely	Low/Moderate	Low	Very Low	Very low			

Table 4.4 - Level of Risk for Potential Hazard Definition

The assessment is discussed below in terms of plausible pollutant linkages.

The pollutant linkages of Linear Alkyl Benzene in the shallow soils/groundwater and nearby receptors are summarised in Tables 4.5 below.



Table 4.5 - Pollutant Linkage Assessment for Linear Alkyl Benzene

Source	Pathway	Receptor	Severity	Likelihood	Risk Level	Comments
Human Health						
Historical leaks of cable fluid from underground electricity cable comprising of an approximate volume of 5,170 litres of linear alkyl benzene (LAB) (Sites 5 & 6) Dec 2017 to August 2018.	LAB volatilisation from soil, groundwater and LNAPL into soil pore spaces (Vapour Phase in unsaturated soils), upward migration into houses & other properties to indoor air and then inhalation	Residents Other commercial or retail building users	Medium	Low Likelihood	Low/Moderate	Has the potential to migrate along preferential pathways such as service trenches. Outside of preferential pathways, contamination will strongly sorb to soil, has low mobility, readily biodegrades under aerobic conditions in both soil and water and does not exist readily in the vapour-phase, consequently the risk to nearby residents is low/moderate.
PCOCs include: TPH fractions, BTEX compounds, Speciated PAHs SVOCs VOCs	LAB partitioning to soil (sorbed phase), groundwater (dissolved phase) and as NAPL (free phase). Then direct dermal contact/ingestion of soils and or dusts, inhalation of soil dusts / ingestion of home grown produce	Residents & other commercial or retail building users	Medium	Unlikely	Low	The cable source of leak is at a depth of 0.9m and so direct contact and ingestion pathways are unlikely to be viable unless groundwater levels are near ground surface or capillary action brings contamination upwards into shallow soils where direct contact is possible.



LAB partitioning to soil (sorbed phase), groundwater (dissolved phase) and as NAPL (free phase). Then permeation through plastic potable water supply pipes and ingestion	Nearby residents and other users of the water mains	Medium	Unlikely	Low	Water supply pipes could potentially be present next to a power cable with the leaked cable fluid that has the potential to permeate plastic water supply pipes. With the exception of NAPL presence, the risk is unlikely to cause actual harm to health because any permeating contaminants would be diluted by water flows in the water supply pipe and the dissolved concentrations will be less than WHO drinking water threshold guidelines due to low solubility limits. Also, Irish Water reviews of sampling data and subsequent risk assessments suggest that there has been no impact to potable water pipes based on the absence of COPC detections and the high-pressure nature of supply pipes. Risk rating may change if evidence of dynamic hydrological regime is observed or significant free phase product is observed proximal to pipe.
LAB volatilisation from soil, groundwater and LNAPL into soil pore spaces (Vapour Phase in unsaturated soils), upward migration to outdoor air and then inhalation	Workers undertaking any subsurface works	Medium	Unlikely	Low	Risk to workers from localised areas of contamination and vapours is unlikely due to low volatility and exposure in outdoor air, if it does occur it will be short term and can be managed with the correct PPE and H&S procedures.





	LAB partitioning to soil (sorbed phase), groundwater (dissolved phase) and as NAPL (free phase). Then direct dermal contact/ingestion of soils and or dusts, inhalation of soil dusts	Workers undertaking any subsurface works	Medium	Unlikely	Low	Risk to workers from localised areas of contamination will be short term and can be managed with the correct PPE and H&S procedures.
Environmental – Water	Receptors					
Historical leaks of cable fluid from underground electricity cable comprising of an approximate volume of 5,170 litres of linear alkyl benzene (LAB) (Sites 5 & 6) Dec 2017 to August 2018. PCOCs include: TPH fractions, BTEX compounds, Speciated PAHs SVOCs, VOCs,	LAB partitioning to soil (sorbed phase) and as NAPL in soil pore spaces, that then can leach downwards to groundwater in shallow made ground and glacial till soils	Shallow groundwater	Mild	Low Likelihood	Low	Low risk due to alkyl benzene contamination strongly absorbs to soil, has low mobility, readily biodegrades in aerobic conditions in both soil and water. Shallow groundwater in made ground and glacial till unlikely to be used as an actual resource due low water volumes and location in a residential urban area. Overall risk is low.



4.4. SUMMARY OF PRELIMINARY QUANTITATIVE RISK ASSESSMENT

A desktop study and site walkover were conducted at the Fairview Site in Ballymun after there was a suspected volume of 5,170 litres of linear alkyl benzene lost from the cable combined between two leaks (Sites 5 & 6) at an approximate rate of 575L/month for 9 months. The leaks began on December 2017 and were repaired in August 2018. The volume of fluid lost of COPC (LAB) at each site is unknown. Results of the PQRA are summarised below:

4.4.1 Human Health:

- There is a potential Low/Moderate risk posed by LAB vapours in suspected contamination in the soil and groundwater through preferential pathways such as services ducts to residents or other building users;
- There is a potential Low risk posed by LAB from contact with suspected contamination in the soil and groundwater through direct dermal/inhalation and ingestion contact to residents or other building users;
- There is a potential Low risk posed by LAB contact from ingestion contact with suspected contamination in the soil and groundwater through permeation of contamination through plastic water pipes;
- There is a potential Low risk to construction workers from dermal/inhalation and ingestion pathways which can be managed by appropriate use of PPE and H&S procedures.

4.4.2 Environmental:

- There is a potential Low risk posed by LAB to shallow groundwater from suspected contamination in the shallow made ground and glacial till subsoils given the contaminant properties of low mobility and high sorption to soil, with shallow groundwater unlikely to be a viable groundwater resource in the residential urban setting.
- Any potential contamination arising from the leakages will be restricted to shallow groundwater underlying the project area. As noted in the above bullet point the risk to this shallow groundwater body will be low. Due to the presence of the shallow groundwater body, which is likely to be perched at the base of made ground and due to the presence of glacial till underlying the project area and its capacity to limit the lateral migration of groundwater no pathway is considered to occur between the project area and the River Tolka to the south.

4.5. SUMMARY AND CONCLUSIONS

This preliminary environmental site assessment consists of a review of the potential environmental impact associated with a hydrocarbon leak from a power cable on Griffith Avenue, Dublin 9 (ESB Ref: 6). There was another leak within 280m east of this location on Griffith Avenue (ESB Site Ref: 5). The reported data for these hydrocarbon insulating cable fluid leaks is combined.

There was an approximate volume of 5170 litres of cable fluid consisting of linear alkyl benzene lost to ground from the two leaks on Griffith Avenue at an approximate rate of 575L/month for nine months. The leaks began in December 2017 and were repaired in August 2018.



The known leak point is located on the southern side of the roadway of Griffith Avenue which is a residential area. There is evidence of abundant site services in the roadway, the grass verge and concrete footpaths with manhole covers and traffic service kiosk. There is no physical evidence of hydrocarbon contamination on the surface in terms of oil odours/staining or impact to vegetation.

The site is underlain by the locally important dark calp limestones of the Lucan Formation. The vulnerability is Low indicating low permeability limestone till subsoils, which provide a good level of natural protection to the underlying bedrock aquifer.

The nearest surface watercourse is the Tolka River located approximately 890m to the south. There are no groundwater wells or ecologically sensitive receptors located within a 1km radius of the site. Groundwater in the bedrock aquifer is likely to be semi-confined by the thick subsoils with groundwater flow direction in a southerly direction following site topography.

There are no hydrogeological pathways connecting the project area to the River Tolka or to protected areas occurring at and in the vicinity of the River Tolka Estuary at Dublin Bay.

At the time of reporting, Irish Water have examined all available drinking water quality sample data and have concluded that there is no evidence that COPCs from the leak site have infiltrated the Cork City drinking water supply. This evaluation is based on a review of all samples taken from customerpoints, between 2014 and 2019; which showed no evidence that the COPCs (PAHs and Benzenes) were present in the water supply at levels above drinking water standards (PAHs: $0.1\mu g/L$; Benzene: $1.0\mu g/L$). These results (which are from samples taken at the customer tap) would not indicate that leaks from oil filled cables have contaminated the drinking water supply for these areas, or at least to an extent where any contamination arising has resulted in a breach of the parametric value for PAHs and Benzene (Appendix F).

Based on the known cable leak point, COPC fate and transport and hydrogeological desk study information the CSM has the following initial key findings for human health and environmental risks;

There is no risk posed by LAB to:

- Surface waters in the wider surrounding area. The River Tolka is the nearest watercourses to the project area and there is no hydrogeological pathway connecting the project area to this watercourse. Hence there is no link to the SPA;

There is a potential Low risk posed by LAB from contact with suspected contamination in the soil and groundwater through;

- direct dermal/inhalation and ingestion contact to residents or other building users;
- dermal/inhalation and ingestion pathways to construction workers, which can be managed by appropriate use of PPE and H&S procedures;
- Leaching to shallow groundwater given the contaminant properties of low mobility and high sorption to soil, with shallow groundwater unlikely to be a viable groundwater resource in the residential urban setting;
- ingestion contact with suspected contamination in the soil and groundwater through permeation of contamination through plastic water pipes or through low-pressure infiltration of possible soil contamination into water pipes via nearby breaks or leaks;



There is a potential Low/Moderate risk posed by LAB in suspected contamination in the soil and groundwater through;

- hydrocarbon vapours in preferential pathways such as services ducts to residents or other building users.

In order to further develop the conceptual site model and investigate the identified potential risks to sensitive receptors further investigation has been recommended in the form of site investigation.

5. REFERENCES

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- Petroleum Products in Drinking-water Background document for development of WHO Guidelines for Drinking-water Quality, World Health Organization 2008.
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Respectfully submitted On behalf of Verde Environmental Consultants

Senior Hydrogeologist

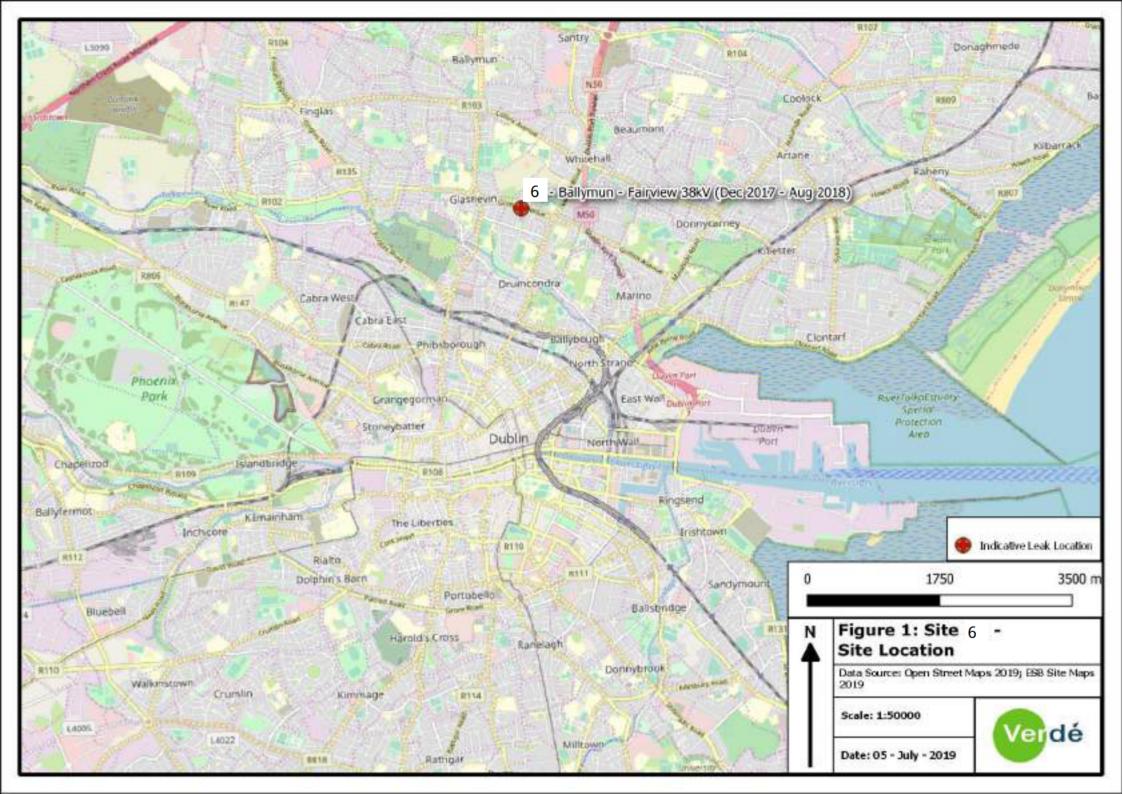
Project Director

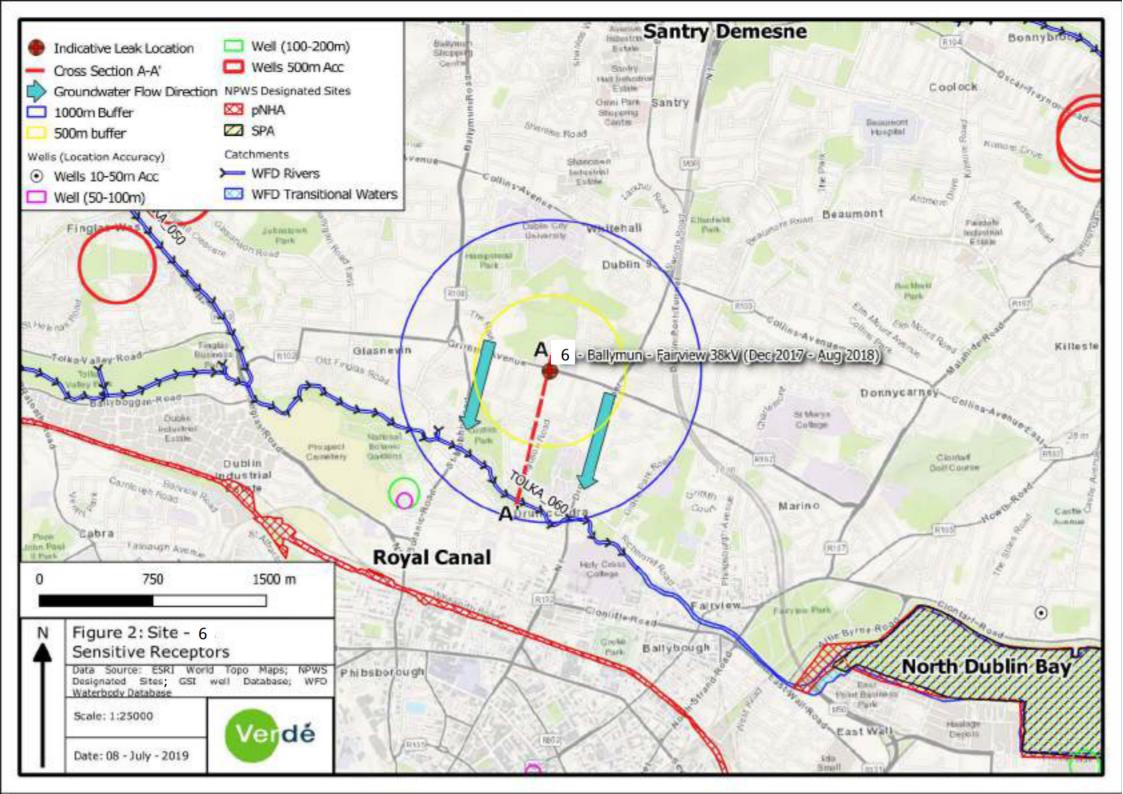




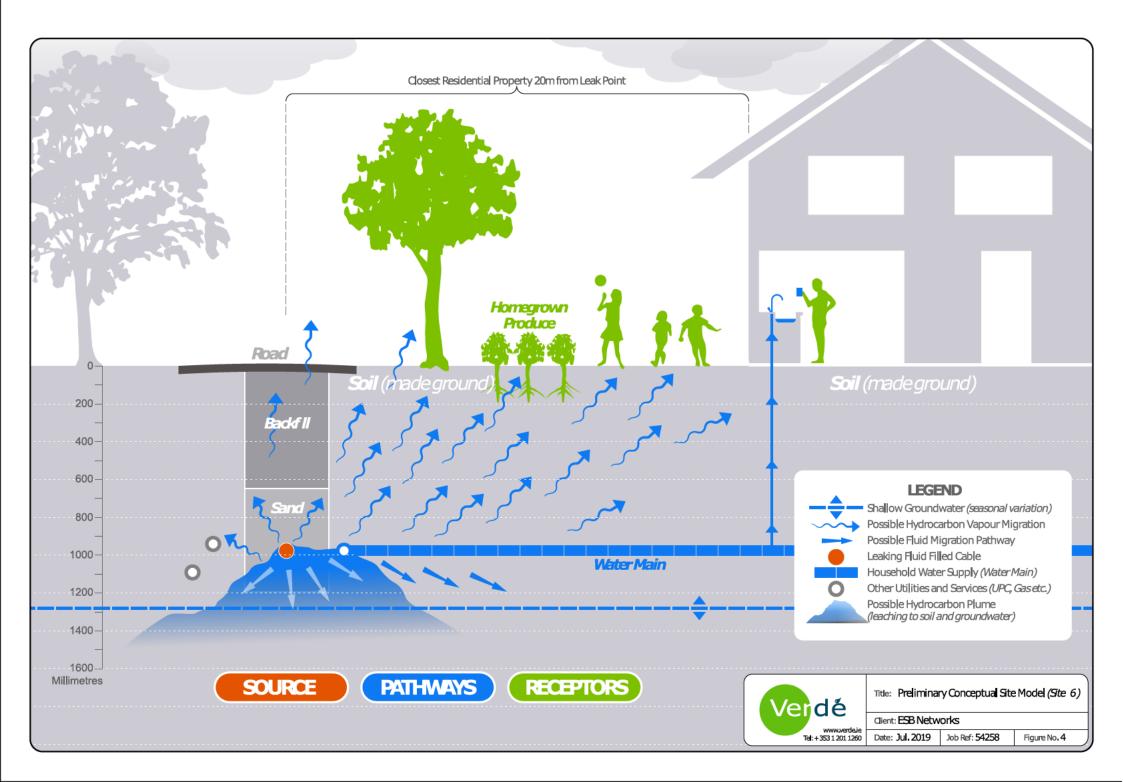
FIGURES

ESB PSA Report – 6 Ballymun - Fairview 38kV





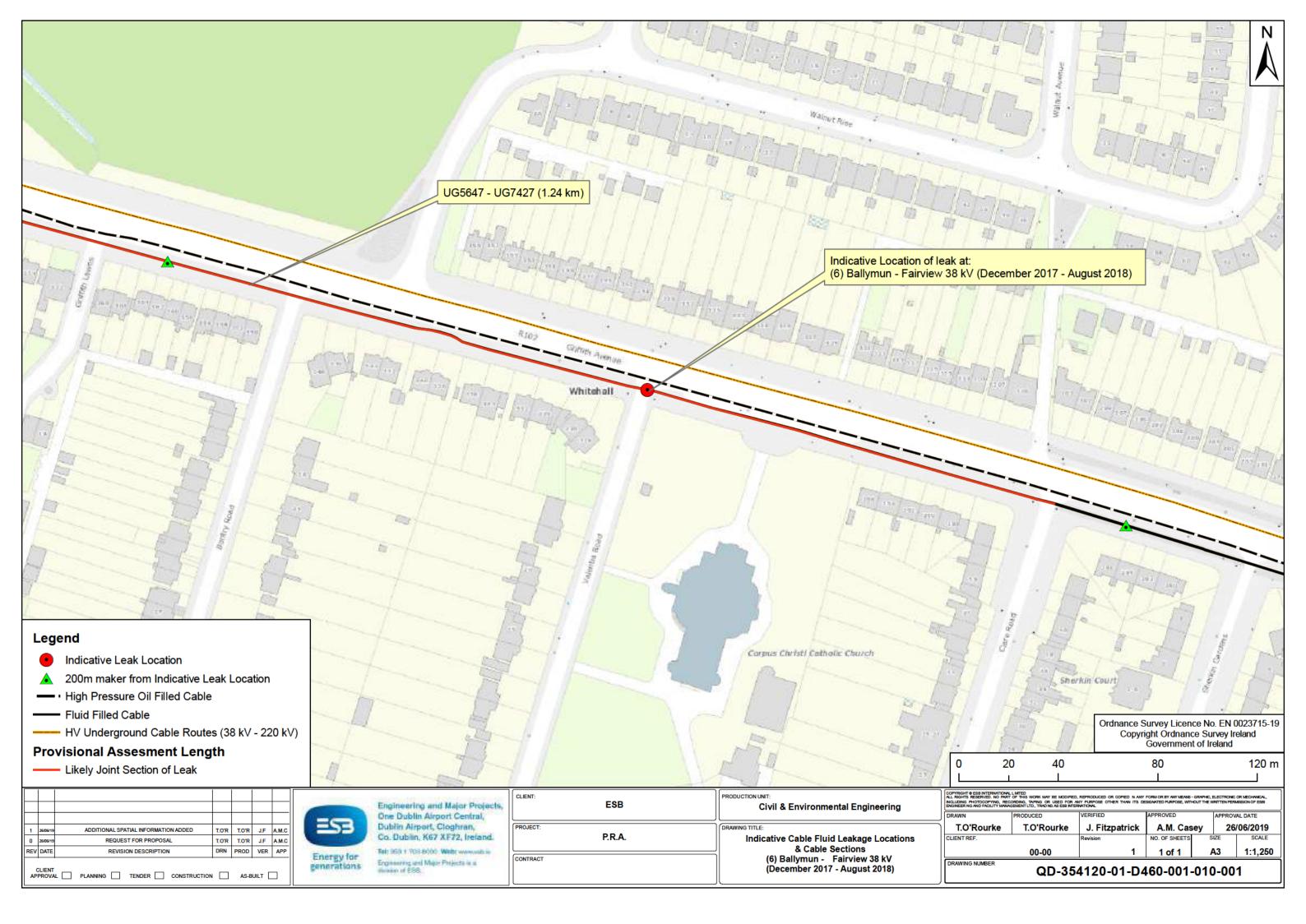






APPENDIX A

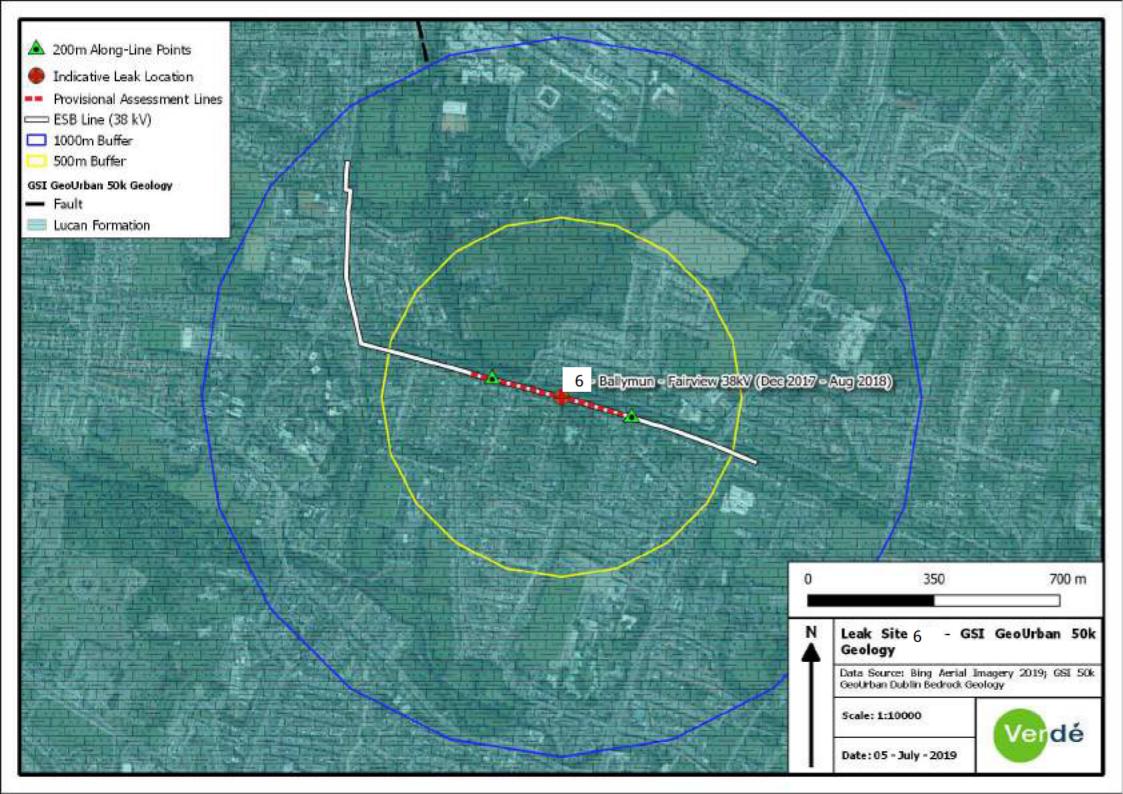
ESB SITE LAYOUT PLAN WITH INDICATIVE CABLE FLUID LEAKAGE LOCATION

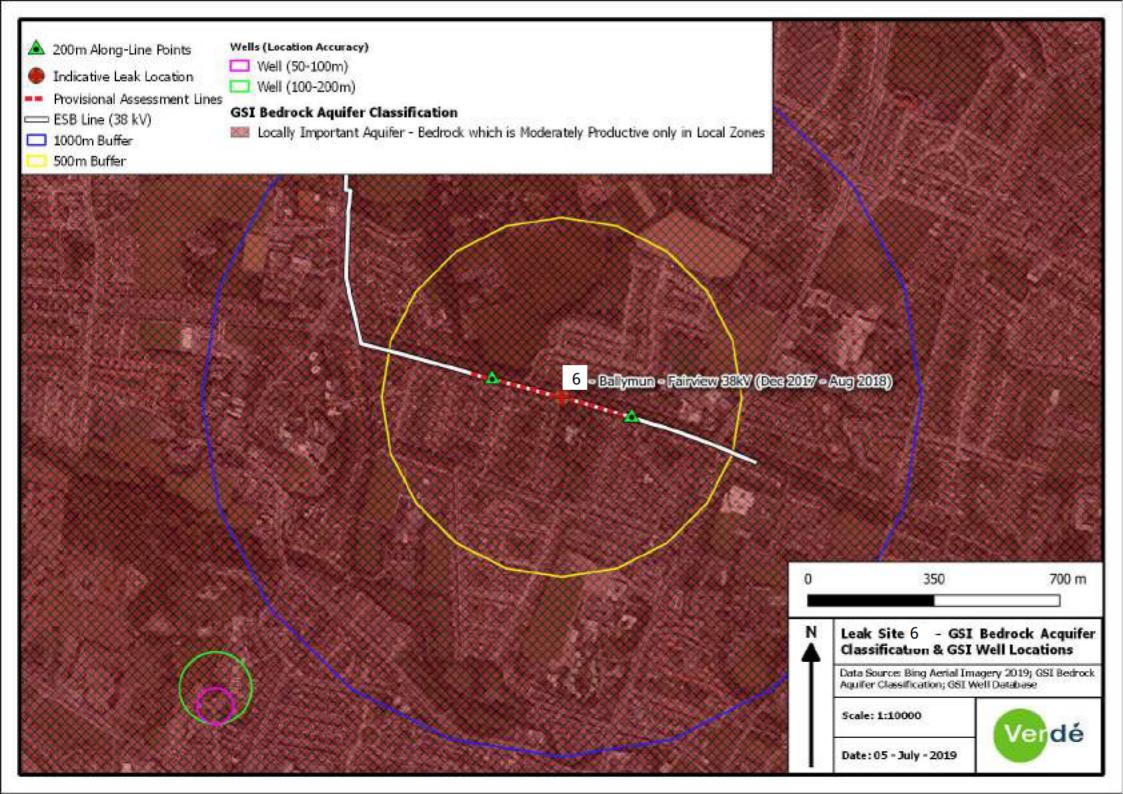


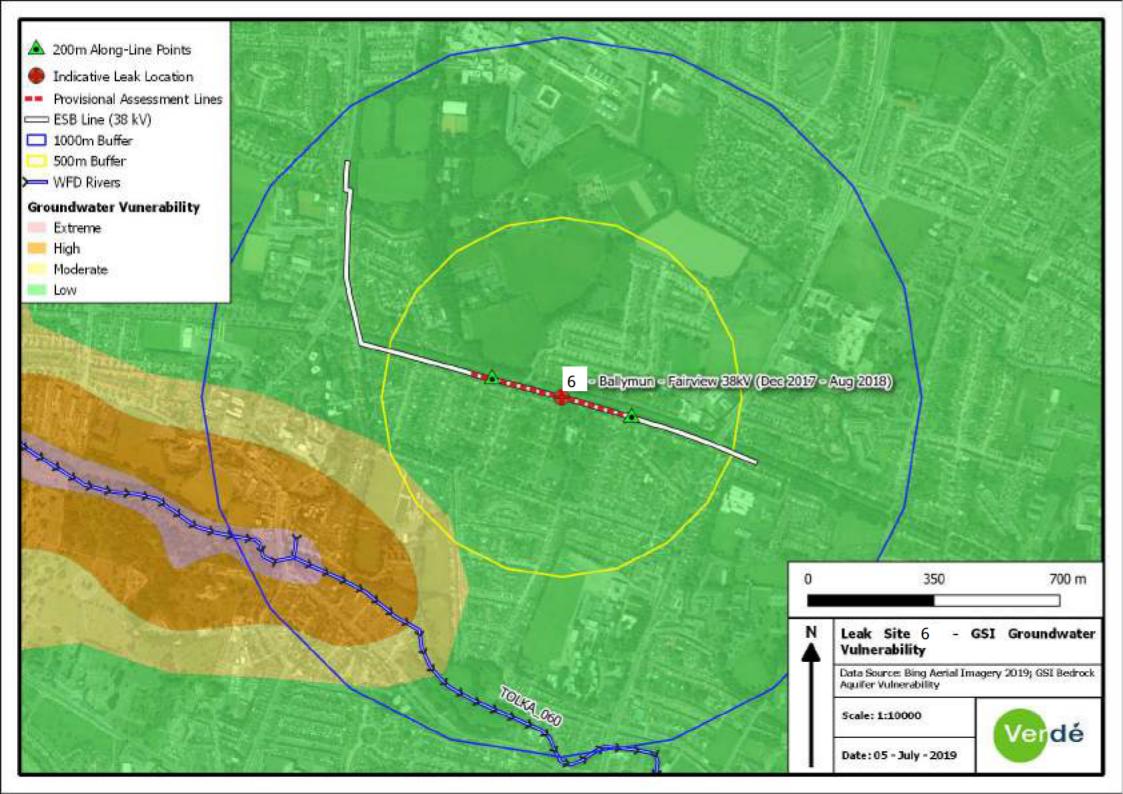


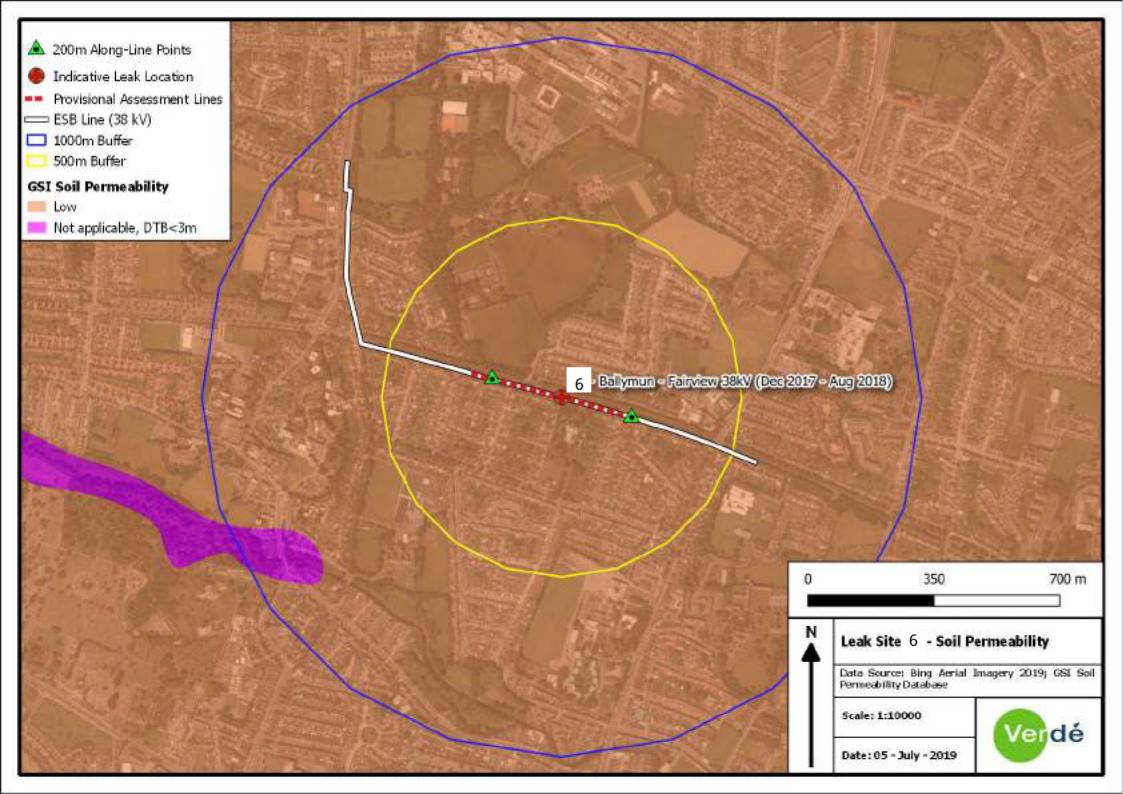
APPENDIX B

DESK STUDY MAPS

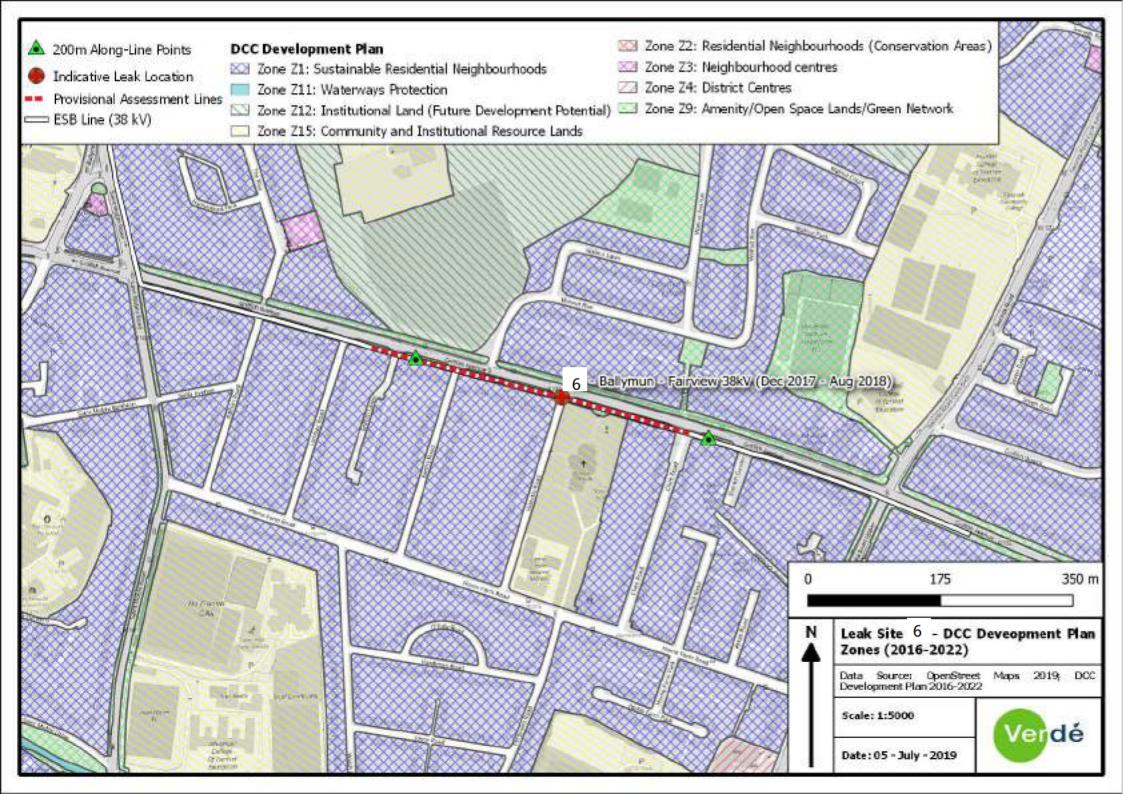


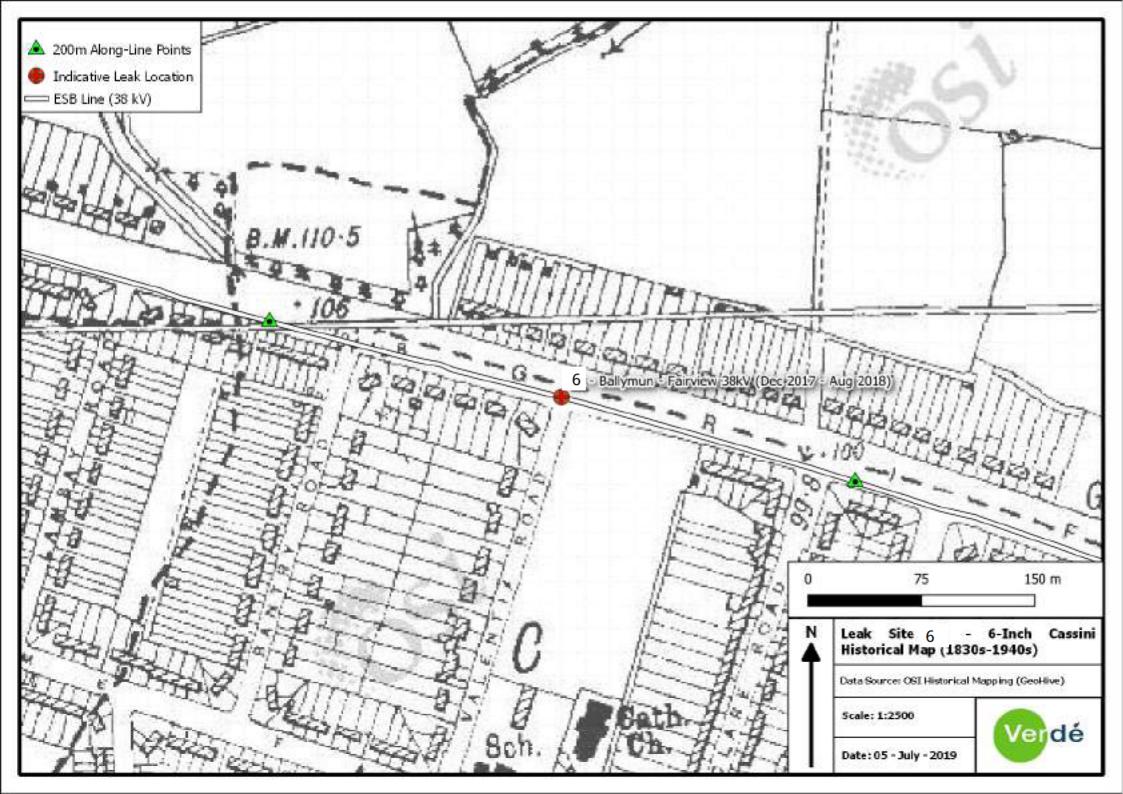


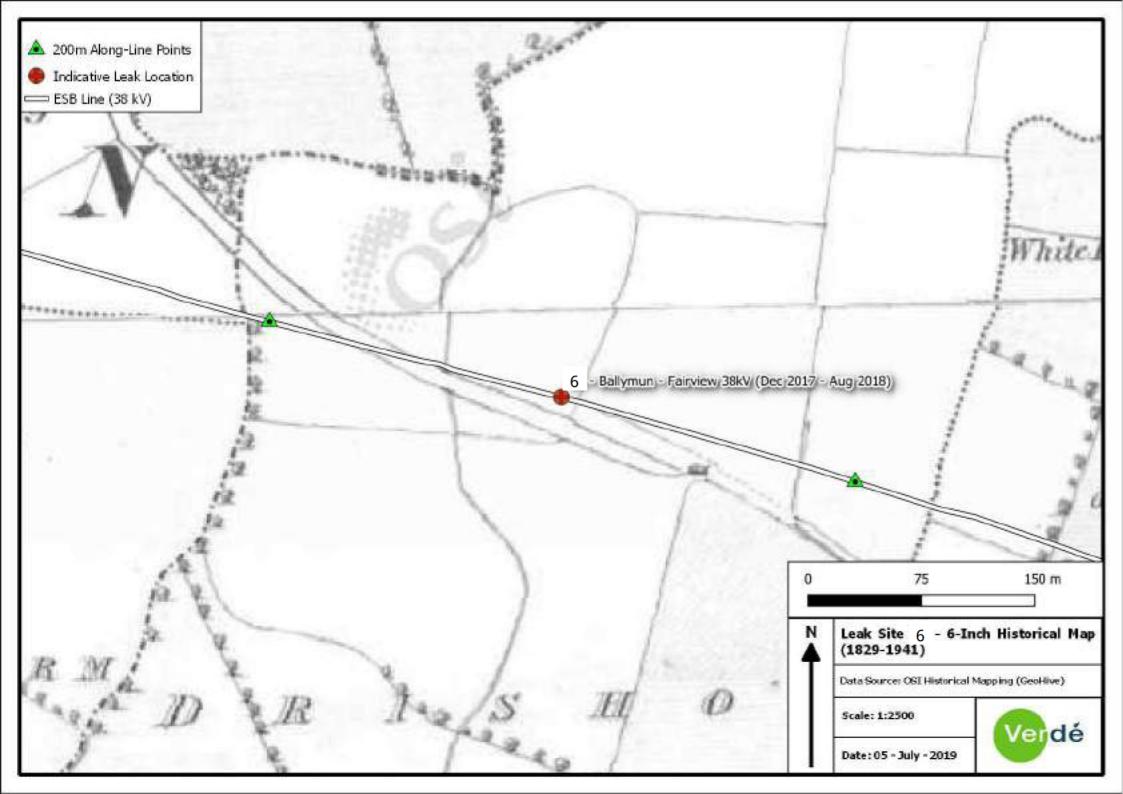


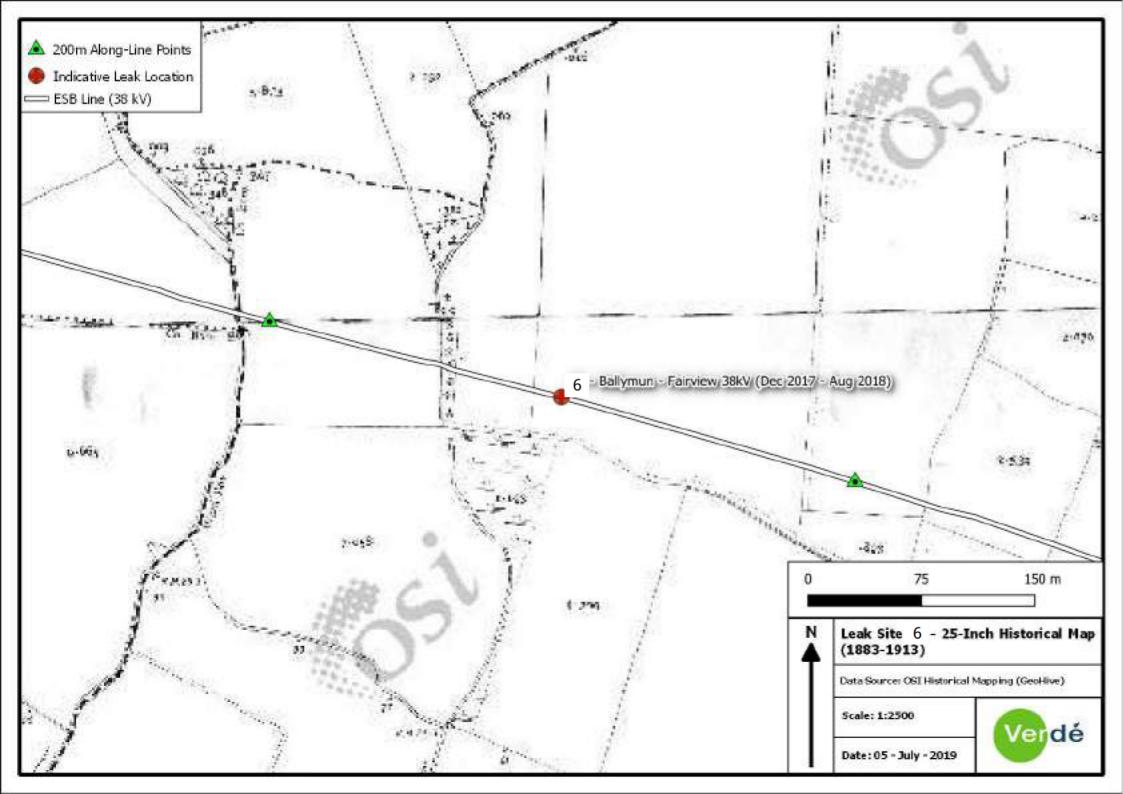






















APPENDIX C

SITE PHOTOGRAPHS

ESB PSA Report - 6 Ballymun - Fairview 38kV



Photo 1: At 200m west of Leak Point - View to east







Photo 2: ESB Services Approx 90m west of leak point on grass verge







Photo 3: Leak point location in area of newer concrete - abundant services in area

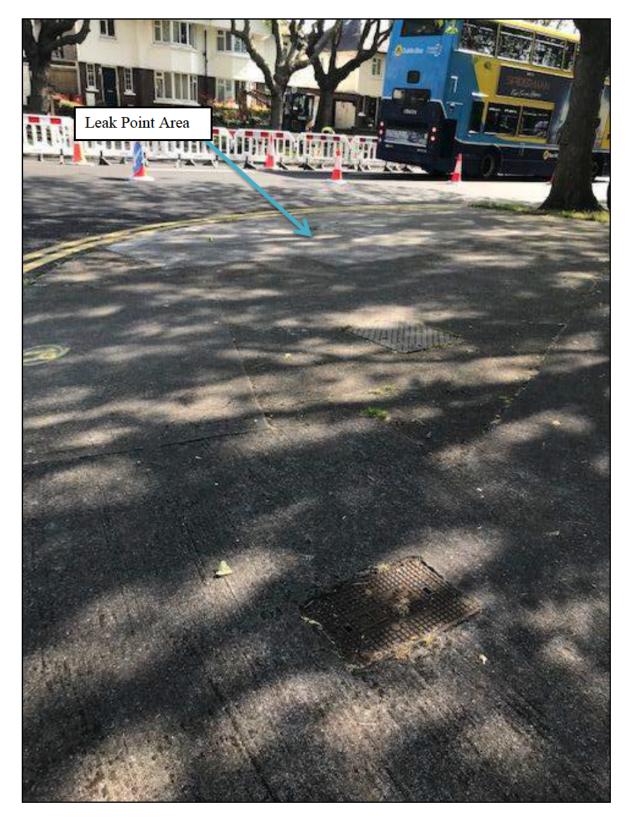






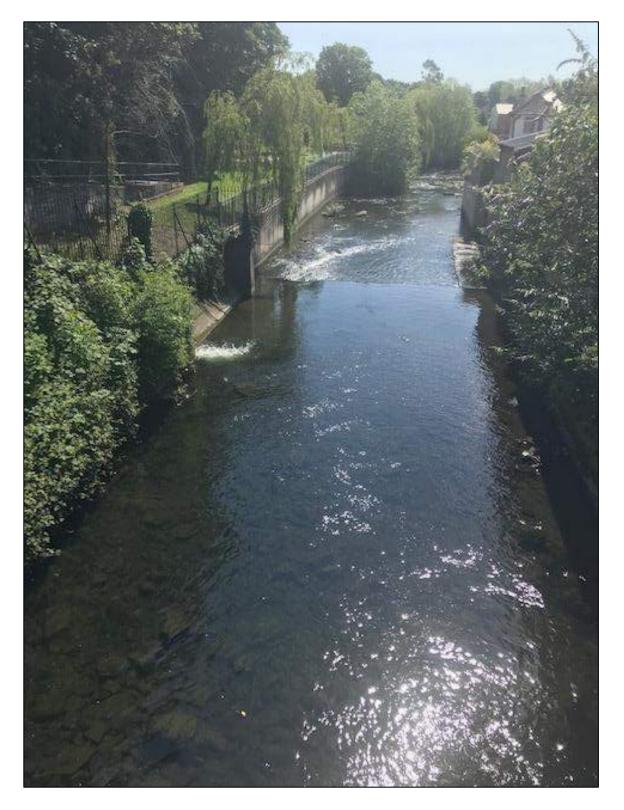
Photo 4: Approx 150m east of leak point – facing west. Traffic Kiosk between grass verge and concrete footpath







Photo 5: Tolka River approx. 890m south west of leak point







APPENDIX D

MSDS FOR COPC

1. LINEAR ALKYL BENZENES

2. MINERAL OIL



MATERIAL SAFETY DATA SHEET

1: IDENTIFICATION OF THE SUBSTANCE / PREPARATION AND OF THE COMPANY / UNDERTAKING

Product Name:	T 3788		
Application:	Hollow-core Energy Cable Saturant		
Company:	H&R ESP Ltd.		
<u>Address:</u>	Matrix House North 4 th Street Milton Keynes, MK9 1NJ United Kingdom		
<u>Telephone:</u>	+44 (0)1908 351 111	Fax:	+44 (0)1908 351122

2: COMPOSITION / INFORMATION ON INGREDIENTS

- <u>Composition:</u> Low viscosity compound based on a blend of linear alkyl benzenes that have side alkyl chains of 10 13 carbon atoms in length.
- Synonyms: Linear Alkyl Benzenes Alkyl C10-C13, benzenes Benzene, C10-13-alkyl-deriv. Detergent Alkylate

Composition	EINECS	CAS	Symbol	Risk	Concentration
	number	number	letters	numbers	range
C10 – C13 Linear Alkyl Benzenes	267-051-0	67774-74-7	Not re	gulated	100%

All constituents of this product are listed in EINECS (European Inventory of Existing Commercial Chemical Substances) or ELINCS (European List of Notified Chemical Substances) or are exempt.

3: HAZARDS IDENTIFICATION

Classification of preparation:	This product is <u>not</u> classified as a dangerous substance / preparation in accordance with The Chemicals (Hazard Information and Packaging for Supply) Regulations 2002 (CHIP3).
Physical and Chemical Properties:	Not classified as flammable, but will burn. Avoid contact with

sical and Chemical Properties: Not classified as flammable, but will burn. Avoid contact with strong oxidisers.

Health Effects

<u>Skin:</u>	Contact with the skin may cause irritation. Prolonged or repeated skin contact may cause drying of the skin, progressing to dermatitis. Symptoms may include itching, discolouration, swelling and blistering.
Eyes:	Contact with the eyes may cause irritation. Symptoms may include reddening, swelling and impaired vision.
Ingestion:	Ingestion of small amounts may cause nausea and vomiting.
Inhalation:	Due to low volatility, this product should not present an inhalation hazard under ambient conditions. Exposure to vapour or mineral oil mists may irritate the mucous membranes and cause dizziness, headaches and nausea.

Environmental Effects

No specific hazards under normal use conditions.

4: FIRST AID MEASURES

Inhalation:	Remove from further exposure. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance and call a doctor. If breathing has stopped, administer artificial respiration.
Skin contact:	Remove contaminated clothing and wash affected skin with soap and water. If persistent irritation occurs, obtain medical attention. If high pressure injection injuries occur, obtain medical attention immediately.
Eye contact:	Flush eye with copious quantities of water. If persistent irritation occurs, obtain medical attention.
Ingestion:	Wash out mouth with water and obtain medical attention. DO NOT INDUCE VOMITING.

5: FIRE FIGHTING MEASURES

Suitable extinguishing media: Unsuitable extinguishing media:	Carbon dioxide (CO ₂), dry chemical, foam or water spray. Do not use water jets.
Special exposure hazards:	Combustion is likely to give rise to a complex mixture of airborne solid and liquid particulates and gases, including carbon monoxide, and unidentified organic and inorganic compounds.
Special protective equipment:	Proper protective equipment including breathing apparatus must be worn when approaching a fire in a confined space.

6: ACCIDENTAL RELEASE MEASURES

Personal Precautions:	Spilt product presents a significant slip hazard. Remove any sources of heat.
Environmental Precautions:	Prevent from spreading or entering into drains, sewers and watercourses by using inert absorbent material or other appropriate barriers. Inform local authorities if this cannot be prevented.
Methods for cleaning up:	Absorb liquid with inert absorbent material. Sweep up and remove to a suitable, clearly marked container for disposal in accordance with local and national regulations
7: HANDLING AND STORAGE	
<u>Handling:</u>	Do not eat, drink or smoke whilst using this product. To avoid the possibility of skin disorders repeated or prolonged contact with products of this type must be avoided. It is essential to maintain a high standard of personal hygiene.
<u>Storage:</u>	Store in a cool place away from sources of heat and out of direct sunlight to avoid pressure build up. Do not store near oxidisers.
Handling and Storage Materials and	Coatings

Suitable:	Carbon steel, baked epoxy or Phenolic coatings, aluminium.
Unsuitable:	Natural rubber, Butyl rubber

8: EXPOSURE CONTROLS / PERSONAL PROTECTION

Occupational Exposure Limits:	Not established.
Engineering control measures:	Use of local exhaust ventilation is recommended whenever this product is used in a confined space, is heated above ambient temperatures, or is agitated.
Hygiene measures:	Wash hands before eating, drinking, smoking and using the toilet. Gloves should be washed before being removed.
Respiratory Protection:	Normally not required if adequate ventilation is in place. Where concentrations in air may exceed the limits given in this section, it is recommended to use a half mask respirator to protect from over exposure by inhalation. Suitable filter material depends on the amount and type of chemicals being handled, but filter material suitable for organic vapours may be considered for use.
Hand Protection:	When handling this product it is recommended to wear chemical resistant gloves. Suggested materials for protective gloves include: PVC, Neoprene or similar.
Eye Protection:	Wear eye protection such as safety glasses, chemical goggles, or face shield if engineering controls or work practices are not adequate to prevent eye contact. Have suitable eye wash water available.

T 3788 MSDS Revision No. 00/09/05 Page 3 of 7 Wear impervious protective clothing to prevent skin contact. Selection of protective clothing may include gloves, apron, boots, and complete facial protection depending on operations conducted.

9: PHYSICAL AND CHEMICAL PROPERTIES

General Information	
Appearance:	Clear, colourless liquid
Odour:	Mild petroleum odour

Health, safety and environmental information		
Not determined		
280℃		
>135℃		
Non flammable		
Not explosive		
Not applicable		
<0.02 kPa		
0.86 g/cm⁻³ at 20℃ typical		
Insoluble		
$4.0 - 4.5 \text{ cSt} (4.0 - 4.5 \text{ mm}^2/\text{s}) \text{ typical}$		
>1		
Not determined		

Other information	
Pour point:	-60℃ typical
Expansion coefficient:	0.0007 /℃ typical
Neutralisation value:	0.03 mg KOH g ⁻¹ maximum

10: STABILITY AND REACTIVITY

Chemical stability:	This material is considered stable under normal ambient and anticipated storage and handling conditions of temperature and pressure and will not polymerise.
Conditions to avoid:	Temperatures above 140℃
Materials to avoid:	Strong oxidising agents, such as liquid chlorine, concentrated oxygen, sodium hypochlorite, calcium hypochlorite, peroxides etc, as this may present an explosion hazard.
Hazardous decomposition products:	Carbon monoxide and irritant fumes may be generated if this product is burned in an enclosed space.

11: TOXICOLOGICAL INFORMATION

Basis for assessment:	Toxicological data have not been determined specifically for this product. Information given is based on a knowledge of the components and the toxicology of similar products.
Acute toxicity:	Oral LD50 expected to be >5000 mg/kg (rat)
	Inhalation LC50/4hr expected to be >1.8 mg/l (rat)
	Dermal LD50 expected to be >2000 mg/kg (rabbit)
Corrosivity/irritation:	
Eye:	May be slightly irritant
Skin:	May be slightly irritant
Respiratory tract:	If mists are inhaled, slight irritation of the respiratory tract may occur
Skin sensitisation:	Not expected to be a skin sensitiser
Repeated-dose toxicity:	Prolonged and/or repeated contact may lead to irritation and possibly dermatitis, especially under conditions of poor personal hygiene.
Mutagenicity:	Not expected to be a mutagen.
Carcinogenicity:	Not expected to be a carcinogen.
Reproductive toxicity:	The preparation has not been assessed at all for this end- point, so its hazardous property in this regard is not known.

12: ECOLOGICAL INFORMATION

Basis for assessment:	Ecotoxicological data have not been determined specifically for this product. Information given is based on a knowledge of the components and the ecotoxicology of similar products.
<u>Ecotoxicity:</u>	Poorly soluble mixture. Product is not expected to be ecotoxic to fish/daphinia/algae, or sewage bacteria. This preparation is expected to be removed in a wastewater treatment facility
<u>Mobility:</u>	Liquid under most environmental conditions. Floats on water. If it enters soil, it will adsorb to soil particles and will not be mobile.
Persistence and degradability:	Readily biodegradable.
	Soils degradation – half life approx. 15 days.
	Natural waters degradation – half life approx. 4 – 9 days.
Bioaccumulative potential:	May have the potential to bioaccumulate

13: DISPOSAL CONSIDERATIONS

Disposal must be in accordance with local and national legislation.

Unused Product:	Dispose of through an authorised waste contractor to a licensed site. May be incinerated.
Used/Contaminated Product:	Dispose of through an authorised waste contractor to a licensed site. May be incinerated.
Packaging:	Dispose of through an authorised waste contractor. May be steam cleaned and recycled.

14: TRANSPORT INFORMATION

This product is not classified as dangerous for transport.

15: REGULATORY INFORMATION

Classification/Symbol: Not Regulated

This preparation is not classified as Dangerous according to EU Directives

This safety data sheet is intended to assist in compliance with the following UK legislation:

- Chemicals (Hazard Information and Packaging for Supply) Regulations 2002
- Control of Substances Hazardous to Health Regulations 2002.
- Health and Safety at Work, etc. Act 1974.
- Environmental Protection Act 1990
- Environmental Protection (Duty of Care) Regs. 1991

• COSHH essentials: Easy steps to control chemicals. Control of Substances Hazardous to Health Regulations

Further Guidance

The following guidance notes are available from HMSO or HSE.

Occupational exposure limits (EH 40). Effects of mineral oil on the skin (SHW 397). Preventing dermatitis at work (INDG 233)

A step by step guide to COSHH assessment (HSG 97)

Assessing and managing risks at work from skin exposure to chemical agents (HSG 205) The selection, use and maintenance of respiratory protective equipment: A practical guide (HSG 53)

Relevant EC Directives:

- Dangerous Substances Directive (DSD)
- Dangerous Preparations Directive (DPD)
- Safety Data Sheets Directive (SDSD)
- Health & Safety Framework Directive

16: OTHER INFORMATION

This data sheet was prepared in accordance with Commission Directive 2001/58/ECand SI 2002 No. 1689 (CHIP 3)

Key References:

- Chemicals (Hazard Information and Packaging for Supply) Regulations 2002
- The compilation of safety data sheets. Approved Code of Practice (third edition)

• Approved supply list (7th Edition). Information approved for the classification and labelling of substances and preparations dangerous for supply. Chemicals (Hazard Information and Packaging for Supply) Regulations 2002

• Approved classification and labelling guide. Chemicals (Hazard Information and Packaging for Supply) Regulations 2002. Guidance on regulations (Fifth edition).

- EH40/2005 Workplace Exposure Limits 2005
- COSHH essentials: Easy steps to control chemicals. Control of Substances Hazardous to Health Regulations
- European Inventory of Existing Commercial Substances (EINECS)

The data and advice given apply when the product is sold for the stated application or applications. The product is not sold as suitable for any other application. Use of the product for applications other than as stated in this sheet may give rise to risks not mentioned in this sheet. You should not use the product other than for the stated application or applications without seeking advice from us.

If you have purchased the product for supply to a third party for use at work, it is your duty to take all necessary steps to secure that any person handling or using this product is provided with the information in this sheet.

If you are an employer, it is your duty to tell your employees and others who may be affected of any hazards described in this sheet and of any precautions that should be taken.

We believe, in good faith and to the best of our knowledge that the preceding information is accurate. However, we give no guarantee or warranty in this respect. The information provided herein may not be adequate for all individuals and/or all situations. The purchaser/user of the product remains responsible for storing, using or dealing with the product safely and in accordance with all applicable laws and regulations.

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Safety Data Sheet

(93/112/EC)



Date of edition: October 1995

	Foam, dry chemical powder, carbon dioxide, sand or earth.
5.	Fire Fighting Measures Extinguishing modia
	Treat symptomatically
	Advice to physicians
	Medical attention is to be obtained immediately.
	If breathing has stopped, apply artificial respiration.
	If treathing but unconscious, place in the recovery position.
	Ast ization into the lungs may occur directly or following ingestion. This can cause chemical pneumonitis which may be fatal.
	Do not induce vomiting.
	Ingestion
	Risse immediately with plenty of water for ar least 10 minutes and seek medical advice.
	Eye
	If high pressure injection injuries occur, obtain medical attention immediately.
	Remove contaminated clothing and wash affected skin with soap and water.
	Skin
	Medical attention is to be obtained immediately.
	If breathing but unconscious, place in the recovery position. If breathing has stopped, apply artificial respiration.
	Remove to fresh air.
	Inhaistion
4.	First Aid Measures
_	
	Av 3d spillage. The poduct is not readily brodegradable.
	Enviromental hazards
	The preparation contains mineral oil, for which an exposure limit for oil mist applies.
	Safety hazards
	No specific hazards under normal use conditions.
	Prolonged or repeated exposure may give rise to dermatitis.
	If swallowed, aspiration into the lungs may cause chemical pneumonltis.
	Human Health Hazards
3.	Hazards Identifikation
	impart hazardous properties to this product.
	On the basis of available information, the components of this preparation are not expected to
	Blend of highly refined mineral oils and additives.
2.	Composition/Information on Ingredients
	Construction of Terroridiants
	Emergency telephone number: 0221/676-3333
*	51063 Köln
	Schanzenstraße 24-30
	FELTEN & GUILLEAUME Energietechnik AG
	Supplier:
	Masse 106
	Product name:

Safety Data Sheet (93/112/EC)

(EsG)

(Date of edition: October 1995

1.0

Fire Fighting Measures (continued)						
Unsuitable extinguishing media						
	et					
	1.2					
Accidental Release Measures						
Ventilate contaminated area thoroughly.						
		ant from entering de	mine			
barriers.						
Clean-up methods	¥.;					
Absorb or contain liquid with sand, earth or spill control material.						
	clearly marked contr	siner for disposal or	reclaination in accordance with local			
regulations.						
Handing and Storag	e					
Handing						
	t in drums, safety foo	otwear should be wo	m and proper handling equipm cat should be			
oxidising agents.		,	and an end of the second and should			
Recommended materia	ls: mild steel, high d	cusity polyethylene	for containers or container linings.			
Exposure Controls/P	ersonal Protectio	n				
Engineering control m	easures					
그는 것이 했다. 이 것이 같이 해야 하는 것이 같이 있는 것이 같이 있는 것이 같이 있는 것이 같이						
Occupational exposure standards						
Couponent name	Limit type	Value/Unit	Other information			
Oilmist		5 mg/m ^s	ACGIH			
	10 min STEL	10 mg/m ³	ACGIH			
A start start to the start start and the start st Start start sta start start sta						
If c i mist cannot be controlled, a respirator fitted with an organic vapour cartrige combined with a						
Hand Protection						
PVC or nitril rubber gloves if splashes are likely to occur and if applicable.						
Eye P otection						
	Do not use water in a ju Specific hazards Combustion is likely to monoxide, oxides of su Accidental Release M Personal precautions Ventilate contaminated Minimise contact with Enviro-imental precau Prevent further leakage Prevent further leakage Prevent from spreading barriers. Clean-up methods Absorb or contain liqu Shovel into a suitable, regulations. Handling and Storag Handling When using do not eat When using	Do not use water in a jet Specific hazards Combustion is likely to give rise to a comp monoxide, oxides of sulphur and unidentifie Accidental Release Measures Personal precautions Ventilate contaminated area thoroughly. Minimise contact with skin. Environmental precautions Prevent further leakage or spillage and prev Prevent from spreading or entering into dra barriers. Clean-up methods Absorb or contain liquid with sand, earth or Shovel into a suitable, clearly marked comp regulations. Handling When using do not eat or drink. When using agents. Recommended materials: mild steel, high d Exposure Controls/Personal Protection Engineering control measures Use only in well ventilated areas. Occupational exposure standards Courponent name Limit type Oil mist 8 h TWA 10 min STEL Respiratory Protection Net controlly required. If c i mist cannot be controlled, a respirator part culate prefilter should be used.	Do not use water in a jet Specific hazards Combustion is likely to give rise to a complex mixture of gases monoxide, oxides of sulphur and unidentified organic and inorg Accidental Release Measures Personal precautions Ventilate contaminated area thoroughly. Minimise contact with skin. Environmental precautions Prevent further leakage or spillage and prevent from entering du Prevent from spreading or entering into drains, ditches or rivers barriers. Clean-up methods Absorb or contain liquid with sand, earth or spill control materi Shovel into a suitable, clearly marked container for disposal or regulations. Handling and Storage Handling When using do not eat or drink. When using do not eat or drink. New oxidising agents. Recommended materials: mild steel, high density polyethylene Exposure Controls/Personal Protection Engineering control measures Use baly in well ventilated areas. Occupational exposure standards Component name Limit type Value/Unit Of mist cannot be controlled, a respirator fitted with an organ p			

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Safety Data Sheet

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EG

Date of edition: October 1995

8.	Exposure Controls and Person Hygiene measures Don't keep oily rags in your pocket Wash hands before eating and drink	i.	ied)	
9.	Physical and Chemical Propert	ies		
	form	liquid		
	colour	yellow		
	pourpoint	<-60'C	DIN ISO 3016	
	flashpoint	145°C	DIN 51758	
	flamm: bility - lower limit (vol%)	0.6		
	flammability - upper limit (vol%)	6.5		
	vapour pressure (20°C)	< 0,01 hPa		
	density (15°C)	888 kg/m ³	DIN 51757	
	solubility in water (20°C)	negligible		
	n-octapol/water partition coeff	na		
	kinem vic viscosity (40°C)	8,5 mm ² /s	DIN 51562	
	Materials to avoid string oxidising agents Hazardous decomposition product Hazardous decomposition products		luting normal storage	
11.	Toxicological Information Toxicological Data: Acute toxicity - oral LD 10 is expected to be > 2000 mg/ Intitation of skin, irritation of eye The product is expected to be slight Sensitisation of skin The product is not expected to be a sight Sensitisation of skin The product is not expected to be a sight Prolonged and/or repeated contact Prolonged/repeated contact may cau skip more susceptible to irritation an Carcinogenicity Product is based on mineral oils of the components are not known to be assis Other information	kg. ly irritant. skin sensitiser. t se defarting of the skin, w id penetration by other ma ypes shown to be non-card ociated with carcinogenic	hich can lead to dermatitis and may n sterials.	ies. Oth

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Date of edition: October 1995

12.	Ecological Information Basis for assessment
-	Information given is based on data on the components and the ecotoxicology of similar products. Mobility Product floats on water. It is liquid under most environmental conditions.
	If it enters soil, it will be adsorbed to soil particles and will not be mobile. Product has the potential to bioaccumulate.
	Ecotoxicity Product is expected to be practically non-toxic to aquatic organisms, LC/EC50 > 100 mg/L.
13.	Disposal Considerations Product Precautions: Dispose to licensed disposal contractor. Waste disposal Nr. (D): 54106
	Container disposal Drain container thoroughly. Dispose to licensed disposal contractor.
	Recomanded cleaning procedure Cleaning by disposal contractor
14.	Transport Information Product is not dangerous for conveyance under UN, IMO, ADR/RID and IATA/ICAO codes. (According ADR/LID regulations from 1.1.1995)
15.	Regulatory Information Classification The Product is not classified as dangerous under EC criteria.
16.	Other Information Additional informations Concave Report 5/87 Health Aspects of Lubricants.
	This information is based on our current knowledge and is intended to describe the product for the purposes of health, safety and environmental requirements only. It should therefore not be construed as guaranteeing any specific property of the product.

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Material Safety Data Sheet

Material Name	Shell Diala Cable Oil
Uses Product Code	: Insulating oil. : 001D8369
	. 00120303
Manufacturer/Supplier	: Shell UK Oil Products Limited
	PO BOX 3 Ellesmere Port
	CH65 4HB
	United Kingdom
Telephone	: +44 (0) 151-350-4000
Fax	: +44 (0) 151-350-4000
Email Contact for	: If you have any enquiries about the content of this MSDS
MSDS	please email lubricantSDS@shell.com
Emergency Telephone	: +44-(0) 151-350-4595
Number	
AZARDS IDENTIFICATION	
EC Classification	: Harmful.
Health Hazards	: Repeated exposure may cause skin dryness or cracking.
	Harmful: may cause lung damage if swallowed.
Signs and Symptoms	: If material enters lungs, signs and symptoms may include
	coughing, choking, wheezing, difficulty in breathing, chest
	congestion, shortness of breath, and/or fever. The onset of
	respiratory symptoms may be delayed for several hours after exposure. Defatting dermatitis signs and symptoms may
	include a burning sensation and/or a dried/cracked
	appearance. Ingestion may result in nausea, vomiting and/or
	diarrhoea.
Safety Hazards Environmental Hazards	Not classified as flammable but will burn.Not classified as dangerous for the environment.
COMPOSITION/INFORMATIO	ON ON INGREDIENTS
Proposition Departmention	
Preparation Description	: Alkyl benzene.
Hazardous Components	
Chemical Identity CAS	EINECS Symbol(s) R-phrase(s) Conc.
Benzene, C10- 67774-74	-7 267-051-0 Xn R65; R66 90.00 - 100.00 %
C13 alkyl derivitives	

Material Safety Data Sheet

4. FIRST AID MEASURES	
Inhalation	 No treatment necessary under normal conditions of use. If symptoms persist, obtain medical advice.
Skin Contact	Remove contaminated clothing. Flush exposed area with water and follow by washing with soap if available. If persistent irritation occurs, obtain medical attention.
Eye Contact	 Flush eye with copious quantities of water. If persistent irritation occurs, obtain medical attention.
Ingestion	If swallowed, do not induce vomiting: transport to nearest medical facility for additional treatment. If vomiting occurs spontaneously, keep head below hips to prevent aspiration. If any of the following delayed signs and symptoms appear within the next 6 hours, transport to the nearest medical facility: fever greater than 101° F (37° C), shortness of breath, chest congestion or continued coughing or wheezing.
Advice to Physician	 Treat symptomatically. Potential for chemical pneumonitis. Consider: gastric lavage with protected airway, administration of activated charcoal. Call a doctor or poison control center for guidance.

5. FIRE FIGHTING MEASURES

Clear fire area of all non-emergency personnel.

Specific Hazards	:	Hazardous combustion products may include: A complex mixture of airborne solid and liquid particulates and gases (smoke). Carbon monoxide. Unidentified organic and inorganic compounds.
Suitable Extinguishing Media Unsuitable Extinguishing	:	Foam, water spray or fog. Dry chemical powder, carbon dioxide, sand or earth may be used for small fires only. Do not use water in a jet.
Media Protective Equipment for Firefighters	:	Proper protective equipment including breathing apparatus must be worn when approaching a fire in a confined space.

6. ACCIDENTAL RELEASE MEASURES

Avoid contact with spilled or released material. For guidance on selection of personal protective equipment see Chapter 8 of this Material Safety Data Sheet. See Chapter 13 for information on disposal. Observe the relevant local and international regulations.

Protective measures	: Avoid contact with skin and eyes. Use appropriate containment to avoid environmental contamination. Prevent from spreading or entering drains, ditches or rivers by using sand, earth, or other appropriate barriers.
Clean Up Methods	: Slippery when spilt. Avoid accidents, clean up immediately. Prevent from spreading by making a barrier with sand, earth or other containment material. Reclaim liquid directly or in an absorbent. Soak up residue with an absorbent such as clay, sand or other suitable material and dispose of properly.
Additional Advice	: Local authorities should be advised if significant spillages

Material Safety Data Sheet

		cannot be contained.
7. HANDLING AND STORAGE		
General Precautions	:	Use local exhaust ventilation if there is risk of inhalation of vapours, mists or aerosols. Properly dispose of any contaminated rags or cleaning materials in order to prevent fires. Use the information in this data sheet as input to a risk assessment of local circumstances to help determine appropriate controls for safe handling, storage and disposal of this material.
Handling	:	Avoid prolonged or repeated contact with skin. Avoid inhaling vapour and/or mists. When handling product in drums, safety footwear should be worn and proper handling equipment should be used.
Storage	:	Keep container tightly closed and in a cool, well-ventilated place. Use properly labelled and closeable containers. Storage Temperature: 0 - 50°C / 32 - 122°F The storage of this product may be subject to the Control of Pollution (Oil Storage) (England) Regulations. Further guidance maybe obtained from the local environmental agency office.
Recommended Materials	:	For containers or container linings, use mild steel or high density polyethylene.
Unsuitable Materials Additional Information	:	PVC. Polyethylene containers should not be exposed to high temperatures because of possible risk of distortion. Exposure to this product should be reduced as low as reasonably practicable. Reference should be made to the Health and Safety Executive's publication "COSHH Essentials".

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

If the American Conference of Governmental Industrial Hygienists (ACGIH) value is provided on this document, it is provided for information only.

Occupational Exposure Limits

Exposure Controls	: The level of protection and types of controls necessary will vary depending upon potential exposure conditions. Select controls based on a risk assessment of local circumstances. Appropriate measures include: Adequate ventilation to control airborne concentrations. Where material is heated, sprayed or mist formed, there is greater potential for airborne concentrations to be generated.
Personal Protective Equipment Respiratory Protection	 Personal protective equipment (PPE) should meet recommended national standards. Check with PPE suppliers. No respiratory protection is ordinarily required under normal conditions of use. In accordance with good industrial hygiene practices, precautions should be taken to avoid breathing of material. If engineering controls do not maintain airborne

	concentrations to a level which is adequate to protect work health, select respiratory protection equipment suitable for specific conditions of use and meeting relevant legislation. Check with respiratory protective equipment suppliers. Whair-filtering respirators are suitable, select an appropriate combination of mask and filter. Select a filter suitable for	the
Hand Protection	combined particulate/organic gases and vapours [boiling p >65 °C (149 °F)] meeting EN141. Where hand contact with the product may occur the use of gloves approved to relevant standards (e.g. Europe: EN37 US: F739) made from the following materials may provide suitable chemical protection: PVC, neoprene or nitrile rubb gloves. Suitability and durability of a glove is dependent on usage, e.g. frequency and duration of contact, chemical resistance of glove material, glove thickness, dexterity. Alw seek advice from glove suppliers. Contaminated gloves sho be replaced. Personal hygiene is a key element of effective hand care. Gloves must only be worn on clean hands. Afte using gloves, hands should be washed and dried thorough	4, er vays ould e er ly.
Eye Protection	Application of a non-perfumed moisturizer is recommended Wear safety glasses or full face shield if splashes are likely occur. Approved to EU Standard EN166.	
Protective Clothing	Skin protection not ordinarily required beyond standard iss work clothes. It is good practice to wear chemical resistant gloves.	
Monitoring Methods	Monitoring of the concentration of substances in the breath zone of workers or in the general workplace may be require confirm compliance with an OEL and adequacy of exposur controls. For some substances biological monitoring may a be appropriate.	ed to e
Environmental Exposure Controls	Minimise release to the environment. An environmental assessment must be made to ensure compliance with loca environmental legislation.	ıl

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance Odour pH Initial Boiling Point and	 Colourless. Liquid at room temperature. Slight hydrocarbon. Not applicable. > 280 °C / 536 °F estimated value(s)
Boiling Range	: < -60 °C / -76 °F Data not available
Pour point Flash point	: Typical 140 °C / 284 °F (PMCC / ASTM D93)
Upper / lower Flammability	: Typical 1 - 10 %(V)
or Explosion limits Auto-ignition temperature	: > 320 °C / 608 °F
Vapour pressure	< 0.5 Pa at 20 °C / 68 °F (estimated value(s))
Density	: Typical 857 kg/m3 at 20 °C / 68 °F
Water solubility n-octanol/water partition	 Negligible. > 6 (based on information on similar products)
coefficient (log Pow)	
Kinematic viscosity	: Typical 4.2 mm2/s at 40 °C / 104 °F
Vapour density (air=1) Evaporation rate (nBuAc=1)	: > 1 (estimated value(s)) : Data not available
· · · · · · · · · · · · · · · · · · ·	

10. STABILITY AND REACTIVIT	Y
Stability Conditions to Avoid Materials to Avoid Hazardous Decomposition Products	 Stable. Extremes of temperature and direct sunlight. Strong oxidising agents. Hazardous decomposition products are not expected to form during normal storage.
11. TOXICOLOGICAL INFORM	TION
Basis for Assessment	: Information given is based on data on the components and the toxicology of similar products.
Acute Oral Toxicity	: Expected to be of low toxicity: LD50 > 5000 mg/kg , Rat Aspiration into the lungs when swallowed or vomited may cause chemical pneumonitis which can be fatal.
Acute Dermal Toxicity Acute Inhalation Toxicity	 Expected to be of low toxicity: LD50 > 5000 mg/kg , Rabbit Not considered to be an inhalation hazard under normal conditions of use.
Skin Irritation	: Expected to be slightly irritating. Repeated exposure may cause skin dryness or cracking.
Eye Irritation	: Expected to be slightly irritating.
Respiratory Irritation	: Inhalation of vapours or mists may cause irritation.
Sensitisation	: Not expected to be a skin sensitiser.
Repeated Dose Toxicity	: Not expected to be a hazard.
Mutagenicity	: Not considered a mutagenic hazard.
Carcinogenicity	: Components are not known to be associated with carcinogenic effects.
Reproductive and Developmental Toxicity	: Not expected to be a hazard.
Additional Information	: Used oils may contain harmful impurities that have accumulated during use. The concentration of such impurities will depend on use and they may present risks to health and the environment on disposal. ALL used oil should be handled with caution and skin contact avoided as far as possible.

12. ECOLOGICAL INFORMATION

Ecotoxicological data have not been determined specifically for this product. Information given is based on a knowledge of the components and the ecotoxicology of similar products.

Acute Toxicity	:	Poorly soluble mixture. May cause physical fouling of aquatic organisms. Expected to be practically non toxic: LL/EL/IL50 > 100 mg/l (to aquatic organisms) (LL/EL50 expressed as the nominal amount of product required to prepare aqueous test extract).
Mobility	:	Liquid under most environmental conditions. Floats on water. If it enters soil, it will adsorb to soil particles and will not be mobile.
Persistence/degradability Bioaccumulation	:	Expected to be inherently biodegradable. Has the potential to bioaccumulate.
Other Adverse Effects	:	Product is a mixture of non-volatile components, which are not

expected to be released to air in any significant quantities. Not expected to have ozone depletion potential, photochemical ozone creation potential or global warming potential.

13. DISPOSAL CONSIDERATIONS

Material Disposal	: Recover or recycle if possible. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste classification and disposal methods in compliance with applicable regulations. Do not dispose into the environment, in drains or in water courses.
Container Disposal	: Dispose in accordance with prevailing regulations, preferably to a recognised collector or contractor. The competence of the collector or contractor should be established beforehand.
Local Legislation	 Disposal should be in accordance with applicable regional, national, and local laws and regulations. EU Waste Disposal Code (EWC): 13 03 08 synthetic insulating and heat transmission oils. Classification of waste is always the responsibility of the end user. Hazardous Waste (England and Wales) Regulations 2005.

14. TRANSPORT INFORMATION

ADR

This material is not classified as dangerous under ADR regulations.

RID

This material is not classified as dangerous under RID regulations.

ADNR

This material is not classified as dangerous under ADNR regulations.

IMDG

This material is not classified as dangerous under IMDG regulations.

IATA (Country variations may apply)

This material is not classified as dangerous under IATA regulations.

15. REGULATORY INFORMATION

The regulatory information is not intended to be comprehensive. Other regulations may apply to this material.

EC Classification	:	Harmful.
EC Symbols	:	Xn Harmful.
EC Risk Phrases	:	R65 Harmful: may cause lung damage if swallowed.
		R66 Repeated exposure may cause skin dryness or cracking.
EC Safety Phrases	:	S62 If swallowed, do not induce vomiting: seek medical advice
		immediately and show this container or label.

Chemical Inventory Status EINECS TSCA Classification triggering components	:	All components listed or polymer exempt. All components listed. Contains alkyl benzene derivatives.
Other Information	:	Environmental Protection Act 1990 (as amended). Health and Safety at Work Act 1974. Consumers Protection Act 1987. Control of Pollution Act 1974. Environmental Act 1995. Factories Act 1961. Carriage of Dangerous Goods by Road and Rail (Classification, Packaging and Labelling) Regulations. Chemicals (Hazard Information and Packaging for Supply) Regulations 2002. Control of Substances Hazardous to Health Regulations 1994 (as amended). Road Traffic (Carriage of Dangerous Substances in Packages) Regulations. Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations. Road Traffic (Carriage of Dangerous Substances in Road Tankers in Tank Containers) Regulations. Road Traffic (Training of Drivers of Vehicles Carrying Dangerous Goods) Regulations. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations. Health and Safety (First Aid) Regulations 1981. Personal Protective Equipment (EC Directive) Regulations 1992. Personal Protective Equipment at Work Regulations 1992.

16. OTHER INFORMATION

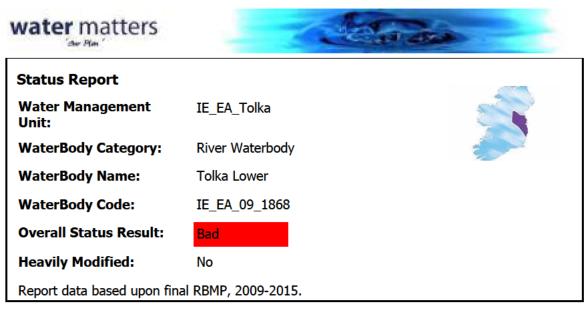
R-phrase(s)

R65 R66			
MSDS Version	Number :	:	1.0
MSDS Effective	e Date :	:	16.09.2010
MSDS Revision	ns :	:	A vertical bar () in the left margin indicates an amendment from the previous version.
MSDS Regulat	ion :	:	Regulation 1907/2006/EC
MSDS Distribu	tion	:	The information in this document should be made available to all who may handle the product.
Disclaimer	:	:	This information is based on our current knowledge and is intended to describe the product for the purposes of health, safety and environmental requirements only. It should not therefore be construed as guaranteeing any specific property of the product.

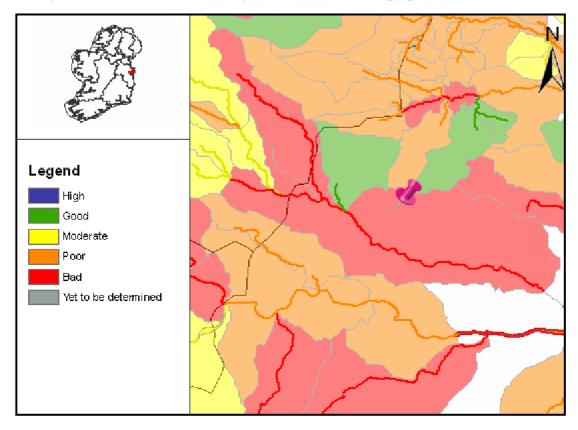


APPENDIX E

WATER FRAMEWORK DIRECTIVE RIVER AND GROUNDWATER BODY MAPS



The information provided above is a summary of the principal findings related to the selected waterbody. Further details and explanation of individual elements of the report are outlined in the following pages.



Date Report Created 08/07/2019

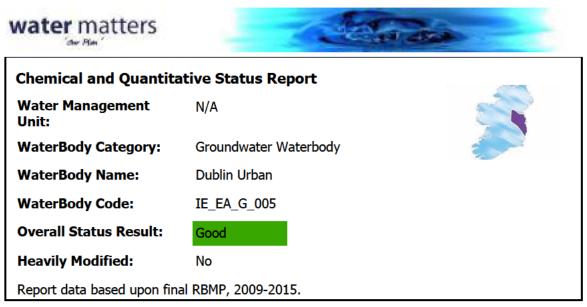
wat	er matters	Here an	
Stat	us Report		
Wate	er Management Unit:	IE_EA_Tolka	
Wate	erBody Category:	River Waterbody	
Wate	erBody Name:	Tolka Lower	
Wate	erBody Code:	IE_EA_09_1868	
Over	all Status Result:	Bad	
Heav	ily Modified:	No	
Repor	rt data based upon final RBMP	, 2009-2015.	
	Status Element Descript	ion	Result
	Status information		
Q	Macroinvertebrate status		Bad
PC	General physico-chemical statu	IS	Moderate
FPQ	Freshwater Pearl Mussel / Mac	roinvertebrate status	N/A
DIA	Diatoms status		N/A
HYM	Hydromorphology status		N/A
FIS	Fish status		Poor
SP	Specific Pollutants status (SP)		N/A
ES	Overall ecological status		Bad
CS	Overall chemical status (PAS)		n/a
EXT	Extrapolated status		N/A
MON	Monitored water body		YES
DON	Donor water bodies		N/A

n/a - not assessed

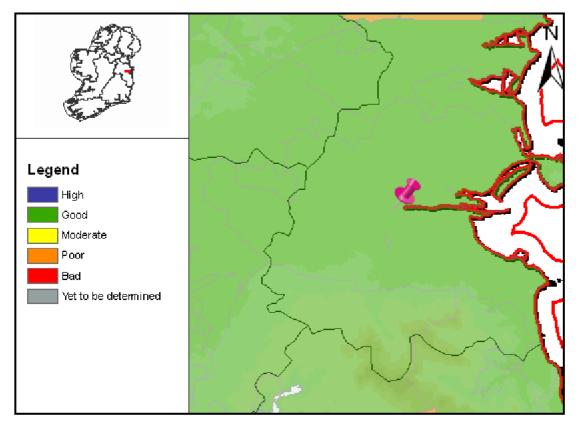
Status

By 'Status' we mean the condition of the water in the waterbody. It is defined by its chemical status and its ecological status, whichever is worse. Waters are ranked in one of 5 status classes: High, Good, Moderate, Poor, Bad. However, not all waterbodies have been monitored, and in such cases the status of a similar nearby waterbody has been used (extrapolated) to assign status. If this has been done the first line of the status report shows the code of the waterbody used to extrapolate.

You can read more about status and how it is measured in our RBMP Document Library at www.wfdireland.ie (Directory 15 Status).



The information provided above is a summary of the principal findings related to the selected waterbody. Further details and explanation of individual elements of the report are outlined in the following pages.



Date Report Created 08/07/2019

water matters



Chemical and Quantitative StatusWater Management Unit:N/AWater Body Category:Groundwater WaterbodyWater Body Name:Dublin UrbanWater Body Code:IE_EA_G_005Overall Status Result:GoodHeavily Modified:NoReport data based upon final RBMP, >>> 2015.

	Status Element Description	Result
	Status information	
INS	Status associated with saline intrusion into groundwater	N/A
DWS	Status associated with exceedances of water quality above specific standards	N/A
DS	Chemical status of groundwater due to pressure from diffuse sources of pollution	N/A
CLS	Chemical status of groundwater due to pressure from contaminated soil or land.	N/A
MS	Chemical status of groundwater due to pressure from mine sites (active or closed).	N/A
UAS	Chemical status of groundwater due to pressures from urban areas	N/A
GWS	General groundwater quality status	N/A
RPS	Status associated with MRP loading to rivers	N/A
TNS	Status associated with nitrate loading to transitional and coastal waters	N/A
SWS	Overall status associated with nutrient loadings to rivers and transitional and coastal waters	N/A
SQS	Status associated with dependant surface water quantitative status	N/A
GDS	Groundwater dependant terrestrial ecosystems status	N/A
QSO	Quantitative status overall	Good
CSO	Chemical status overall	Good
OS	Overall status	Good





GS -HC : Good status High Confidence GS- LC : Good status Low Confidence n/a - not assessed

Status

By 'Status' we mean the condition of the water in the waterbody. It is defined by its chemical status and quantitative status, whichever is worse. Groundwaters are ranked in one of 2 status classes: Good or Poor.

You can read more about status and how it is measured in our RBMP Document Library at www.wfdireland.ie (Directory 15 Status).



APPENDIX F

IRISH WATER RISK ASSESSMENT CORRESPONDENCE





From:

Sent: Wednesday 19 February 2020 12:34

To: (ESB Networks)

Cc: HQDWcompliance ;

Subject: RE: ESB enquiry regarding risk to water supply from cable fluid leaks

Dear

Further to your query (within the attached email), we have examined the locations within your interactive map and cross referenced against the results from our regulatory monitoring programme for **Total Polyaromatic Hydrocarbons** (Total PAHs) and **Benzene**, from 2014 to date. Without knowing the exact chemical composition of the oil used to fill ESB cables, these are the closest parameters we can find from our monitoring programme that would be representative of potential oil contamination.

For the relevant supplies within the Greater Dublin Area, we have recorded zero exceedances of the parametric value (i.e. legally allowable limit) for Total PAHs (which is $0.1\mu g/L$) and Benzene (which is $1\mu g/L$) within this period. The same is true for the Cork City area.

Location Assessed	Number of Samples tested for PAH	Number of exceedances for PAH	Number of Detections* for PAH	Number of Samples tested for Benzene	Number of exceedances for Benzene	Number of Detections* for Benzene
Greater Dublin Area	981	0	15 (Range detected 0.01- 0.04µg/L)	980	0	2 (Range detected 0.1-0.4µg/L)
Cork City	61	0	1 (Result: 0.02µg/L)	61	0	0

A summary of these results are collated in the following table

* **Detections** – where the result was above the limit of detection for the test in question, i.e. the test returned an actual concentration of the analyte

These results (which are from samples taken at the customer tap) would not indicate that leaks from oil filled cables have contaminated the drinking water supply for these areas, or at least to an extent where any contamination arising has resulted in a breach of the parametric value for PAHs and Benzene.

Notwithstanding what these results indicate, oil contamination in drinking water is a **serious public health matter**, and every effort should be made to ensure the likelihood of oil leaks from ESB cables coming into contact with water pipes is minimised to the **lowest possible extent**. Whilst our water mains are pressurised, should pressure levels drop for any reason (nearby burst for example),





contaminated groundwater could potentially infiltrate into our mains. Benzene in particular could also pose a risk to our PVC and Polyethylene pipes.

I trust this analysis and commentary is sufficient for your risk assessment.

Regards,

Drinking Water Compliance Lead Environmental Regulation

Uisce Éireann Teach Colvill, 24-26 Sráid Thalbóid, Balie Átha Cliath 1 **Irish Water** Colvill House, 24-26 Talbot Street, Dublin 1, Ireland



Pesticide awareness – the protective foil of a pesticide container can contain enough product to cause a pesticide exceedance along a 30km stretch of a stream!