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Preliminary Site Assessment

Site 31 Inchicore - Marrowbone Lane 38 kV

Electricity Supply Board

Project number: PR-427640_ACM_RP_ENV_045_2

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The site reconnaissance consisted of a general external inspection of the site aimed at identifying potential sources of ground contamination affecting the site. An environmental compliance audit and/or detailed structural inspection of existing buildings were outside the project brief. Similarly, the site visit excluded detailed consideration of the ecological or archaeological aspects of the site, and if such are believed to be of potential significance then it is recommended that specialist advice is sought.

Any risks identified in this Report are perceived risks, based on the information reviewed during the desk study and therefore partially based on conjecture from available information. The study is limited by the non-intrusive nature of the work and actual risks can only be assessed following a physical investigation of the site.

It should be noted that the effects of ground and water borne contamination on the environment are constantly under review, and authoritative guidance values are potentially subject to change. The conclusions presented herein are based on the guidance values available at the time this Report was prepared, however, no liability by AECOM can be accepted for the retrospective effects of any changes or amendments to these values.

The opinions expressed in this report and the comments and recommendations given are based on a desk assessment of readily available information and an initial site reconnaissance by an AECOM employee. At this stage intrusive investigations have yet to be undertaken at site to establish actual ground and groundwater conditions and to provide data for an assessment of the geo-environmental status of the site.

Unless otherwise stated in this Report, the assessments made assume that the sites and facilities will continue to be used for their current purpose without significant changes.

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Reference to historical Ordnance Survey (OS) maps and/or data provides invaluable information regarding the land use history of a site. However, it should be noted that historical evidence will be incomplete for the period predating the first edition and between the release of successive maps and/or data.

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ABBREVIATIONS

AECOM	AECOM Ireland Limited	
APEC	Area of Potential Environmental Concern	
bgl	Below Ground Level	
BH	Borehole	
BTEX	Benzene, Toluene, Ethylbenzene and Xylene	
CSM	Conceptual Site Model	
ESB	Electricity Supply Board	
EPA	Environmental Protection Agency	
GSI	Geological Survey Ireland	
IEL	Industrial Emissions Licence	
IPC	Integrated Pollution Control	
ITM	Irish Transverse Mercator	
km	Kilometre	
kV	Kilovolt	
LAB	Linear Alkyl Benzene	
m OD	Metres above Ordnance Datum	
NHA	Natural Heritage Areas	
NAPL	Non-Aqueous Phase Liquid	
NPWS	National Park and Wildlife Service	
NWCPO	National Waste Collection Permit Office	
OECD	Organisation for Economic Co-operation and Development	
OPW	Office of Public Works	
OSI	Ordnance Survey Ireland	
PAH	Polycyclic Aromatic Hydrocarbons	
РСВ	Polychlorinated Biphenyls	
PCOC	Potential Constituents of Concern	
pNHA	Proposed Natural Heritage Area	
PSA	Preliminary Site Assessment	
RFP	Request for Proposal	
SAC	Special Area of Conservation	
SDS	Safety Data Sheet	
SIDS	Screening Information Datasets	
SPA	Special Protection Area	
TPH	Total Petroleum Hydrocarbons	
14/4 0	Waste Acceptance Criteria	
WAC	Waste Acceptance Chiena	

EXECUTIVE SUMMARY

Introduction

AECOM Ireland Limited (AECOM) completed a Preliminary Site Assessment (PSA) of a cable fluid leak location on South Circular Road, Dublin 8 (the site).

Electricity Supply Board (ESB) Networks operates and maintains a network of High Voltage (HV) underground cables of over 1,600 kilometres (km) across Ireland, of which approximately 175 km are insulated by a cable fluid. The majority of the fluid filled cables are located in urban settings across Dublin City and Cork City. The remainder are located outside these areas with limited numbers of fluid filled cables in other counties.

The length of each cable route varies and cable routes frequently extend across county boundaries. The 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 cables can develop leaks 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.

A leak was identified by ESB at the site in February 2009 and repaired in November 2009. AECOM understands that the fluid type lost from the cable was a mixture of linear alkyl benzene (LAB) and mineral oil based products.

Objective

The assessment reported herein comprises the first step of Stage 1: Site Characterisation & Assessment – Preliminary Site Assessment (PSA) and was carried out in accordance with *EPA Guidance on the Management of Contaminated Land and Groundwater at EPA Licensed Sites (July 2013),* and specifically the Guideline Template for Preliminary Site Assessment Report. This guidance draws on the *EPA Code of Practice (CoP), Code of Reference for Unregulated Waste Disposal Sites (2007)* and *UK Environment Agency, Model Procedures for the Management of Land Contamination, Contaminated Land Report (CLR) 11 (September 2004).*

In terms of the data requirement for PSA reports, both the EPA CoP and CLR 11 outline that the findings of this initial risk assessment stage are largely based on desk-study information and a site walkover to identify potential pollutant linkages, which are then evaluated using appropriate criteria.

As such, the objective of the PSA reported herein is to:

- Identify potential contamination sources (i.e. the cable fluid), pathways (i.e. breathing in vapours, movement through made ground / soil) and receptors (i.e. who/what will be affected) and the likely interactions between each element;
- Assess the potential severity of the hazard and the sensitivity of the receptor (ranging from minor to severe);
- Assess the likelihood that a risk will occur (ranging from unlikely to high likelihood); and
- Develop a preliminary conceptual site model (CSM) based on an overall assessment of each of these elements above.

The preliminary CSM will then be used to identify potential risks to human health (site users and/or nearby residents) and controlled waters (i.e. groundwater and surface water) which may be associated with a fluid leak from the identified location. It should be noted that this stage of the risk assessment process is based mostly on qualitative information sources and identification of a potential risk at this stage does not necessarily indicate the presence of a risk, but rather the need for further assessment.

A table cross referencing the template headings from the EPA Guidance Template and where the corresponding information is reported herein is presented in Appendix B.

Assessment Findings

Based on the findings of the desktop study, the overall environmental sensitivity of the site is considered to be moderate. Identified sensitive receptors within 1 km of the site include:

• The Grand Canal located 300 m southwest of the site, although this may be protected by low permeability clay (natural and/or engineered when the canal was constructed);

- The Camac River located 500 m north of the site, although this may be protected by low permeability clay deposits; and
- The groundwater aquifer beneath the site, although this may be protected by low permeability clay deposits.

It is estimated that 1,105 litres of cable fluid was released between February 2009 and November 2009. It is assumed, based on information provided to AECOM by ESB, that the fluid lost was a mixture of LAB and mineral oil based products. Due to its high biodegradability, lower volatility and low solubility, it is considered that LABs are of less concern for adverse environmental impact than mineral oil based products. Given that there is potential for a mixture of both types of cable fluids to have been used at this site, potential contaminants of concern have been identified.

A summary of the source audit findings is as follows:

Area of Potential Environmental Concern

Number	APEC	Potential Contaminants of Concern	Potential Media Impacted
1	Leak at (31) Inchicore – Marrowbone Lane 38 kV (February 2009 – November 2009)	LABs Total Petroleum Hydrocarbon (TPH) Benzene, Toluene, Ethylbenzene, Xylene (BTEX) Compounds Volatile Organic Compounds (VOCs) Semi-Volatile Organic Compounds (SVOCs) Polychlorinated Biphenyls (PCBs)	Soil Groundwater Soil Vapour Ground Gas

The preliminary conceptual site model (CSM) developed for the site looked at potential source-pathwayreceptor (SPR) linkages identified during the assessment works and identified a moderate potential risk to the following receptors:

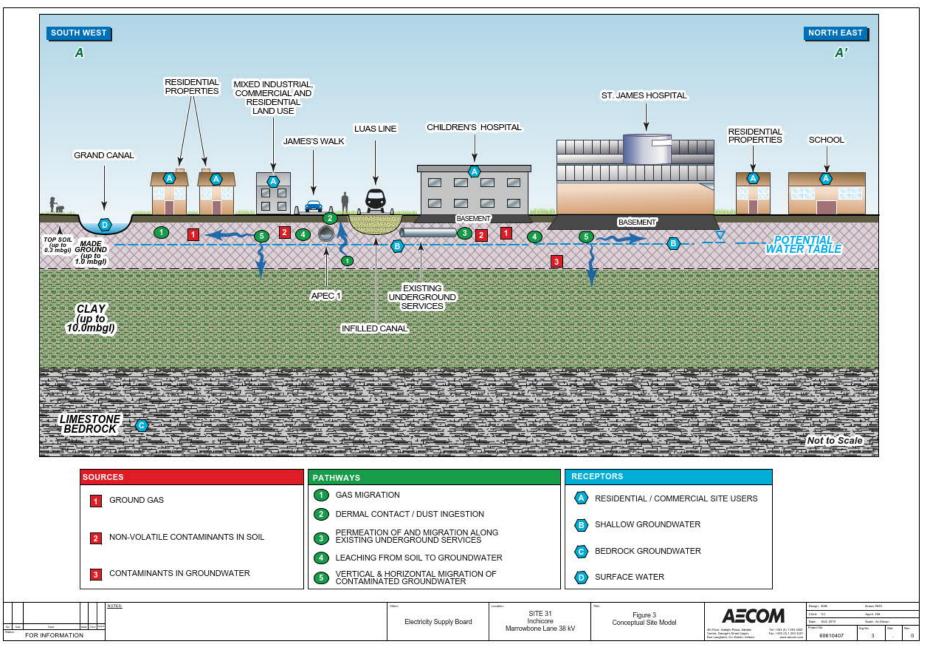
- Site users due to the potential for ground gas generation resulting from degradation of NAPL (if present); and
- Shallow groundwater due to potential impact to groundwater chemistry from the presence of NAPL and associated biodegradation products.

A low to moderate risk was identified to site users from the potential for vapour migration from mineral oil based cable fluid.

A low to moderate risk was identified to nearby surface water bodies via potential migration of cable fluid on groundwater. In addition, potential impact to the deeper groundwater aquifer was considered to be low to moderate due to the geology beneath the site.

Risks associated with other potential source-pathway-receptor linkages were considered to be low.

The risk assessment completed herein is preliminary in nature as it can only be based on an evaluation of qualitative data sources (i.e. not on intrusive site investigation works). Consequently, identification of potential risk does not necessarily indicate a risk to a receptor, rather that further assessment may be required to investigate assumptions made in the CSM and quantify whether a potential risk actually exists. Generally, where a low or very low risk has been identified further assessment may not be deemed necessary to assess a particular SPR linkage, although further assessment may be deemed to be required to investigate CSM assumptions where the potential risk is considered to be low or very low due to the sensitivity of the receptor.



Prepared for: Electricity Supply Board

AECOM

EPA Contaminated Land and Groundwater Risk Assessment Methodology

Table 1 EPA Methodology

Stage	Methodology	Report Reference	Report Date	Status
	Stage 1: Si	te Characterisation and Assessm	ent	
1.1	Preliminary Site Assessment	PR-427640_ACM_RP_ENV_009	24 January 2020	Final
1.2	Detailed Site Assessment			
1.3	Quantitative Risk Assessment			
	Stage 2: Co	rrective Action and Feasibility De	sign	
2.1	Outline Corrective Action Strategy			
2.2	Feasibility Study and Outline Design			
2.3	Detailed Design			
2.4	Final Strategy and Implementation Plan			
Stage 3: Corrective Action Implementation and Aftercare				
3.1	Enabling Works			
3.2	Corrective Action Implementation and Verification			
3.3	Aftercare			

Source: EPA Guidance on the Management of Contaminated Land at EPA Sites

1. Introduction

AECOM Ireland Limited (AECOM) completed a Preliminary Site Assessment (PSA) of a cable fluid leak location for a site on South Circular Road, Dublin 8, Ireland (the site).

This report was commissioned by Electricity Supply Board (ESB) under a request for proposal (RFP) issued on 26 June 2019 (Ref. Qd-354120-01R460_002-001-001) and carried out in accordance with AECOM proposal reference PR-427640_ACM_PL_ENV_001_3, dated 03 July 2019. AECOM understand that ESB has undertaken these works on behalf of ESB Networks.

1.1 Project Background

ESB Networks operates and maintains a network of High Voltage (HV) underground cables of over 1,600 kilometres (km) across Ireland, of which approximately 175 km are insulated by a cable fluid. The majority of the fluid filled cables are located in urban settings across Dublin City and Cork City. The remainder are located outside these areas with limited numbers of fluid filled cables in other counties.

The length of each cable route varies and cable routes frequently extend across county boundaries. The 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 cables can develop leaks 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.

A leak was identified by ESB at the site in February 2009 and repaired in November 2009. AECOM understands that the fluid type lost from the cable was a mixture of linear alkyl benzene (LAB) and mineral oil based products.

The site location is presented in Figure 1 and the site layout showing the site is presented in Figure 2.

1.2 Project Objective

The assessment reported herein comprises the first step of Stage 1: Site Characterisation & Assessment – Preliminary Site Assessment (PSA) and was carried out in accordance with *EPA Guidance on the Management of Contaminated Land and Groundwater at EPA Licensed Sites (July 2013),* and specifically the Guideline Template for Preliminary Site Assessment Report. This guidance draws on the *EPA Code of Practice (CoP), Code of Reference for Unregulated Waste Disposal Sites (2007)* and *UK Environment Agency, Model Procedures for the Management of Land Contamination, Contaminated Land Report (CLR) 11 (September 2004).*

In terms of the data requirement for PSA reports, both the EPA CoP and CLR 11 outline that the findings of this initial risk assessment stage are largely based on desk-study information and a site walkover to identify potential pollutant linkages, which are then evaluated using appropriate criteria.

As such, the objective of the PSA reported herein is to:

- Identify potential contamination sources (i.e. the cable fluid), pathways (i.e. breathing in vapours, movement through made ground / soil) and receptors (i.e. who/what will be affected) and the likely interactions between each element;
- Assess the potential severity of the hazard and the sensitivity of the receptor (ranging from minor to severe);
- Assess the likelihood that a risk will occur (ranging from unlikely to high likelihood); and
- Develop a preliminary conceptual site model (CSM) based on an overall assessment of each of these elements above.

The preliminary CSM will then be used to identify potential risks to human health (site users and/or nearby residents) and controlled waters (i.e. groundwater and surface water) which may be associated with a fluid leak from the identified location. It should be noted that this stage of the risk assessment process is based mostly on qualitative information sources and identification of a potential risk at this

stage does not necessarily indicate the presence of a risk, but rather the need for further assessment.

A table cross referencing the template headings from the EPA Guidance Template and where the corresponding information is reported herein is presented in Appendix B.

2. Scope of Work

To achieve the above objective, the following scope of work was undertaken:

- A site walkover by AECOM staff (completed on 26 July 2019);
- A desktop review of site history to identify areas of potential environmental concern (APEC);
- A desktop review of publicly available information regarding the site's environmental setting and sensitivity, including:
 - Geological Survey of Ireland (GSI) Groundwater Public Viewer Maps (<u>https://dcenr.maps.arcgis.com/apps/MapSeries</u>), accessed 30 July 2019
 - EPA Geoportal Site (<u>https://gis.epa.ie/EPAMaps</u>), accessed 30 July 2019
 - EPA Incidents Database (<u>https://www.epa.ie/newsandevents/incidents/recent/</u>), accessed 30 July 2019
 - Ordnance Survey of Ireland (OSI) (<u>http://geohive.ie</u>), accessed 30 July 2019
 - Glucksman Map Library, Trinity College, Dublin, accessed 06 August 2019
 - Office of Public Works (OPW) Flood Maps (<u>http://www.floodinfo.ie</u>), accessed 30 July 2019
 - National Parks and Wildlife Service (NPWS) (<u>http://webgis.npws.ie/npwsviewer/</u>), accessed 30 July 2019
 - National Waste Collection Permit Office (NWCPO) website (<u>http://www.nwcpo.ie/</u>), accessed 30 July 2019
- A review of information provided by ESB in the RFP; and
- Data assessment and reporting.

3. Environmental Setting

3.1 Topography

The site is located at the junction of James Walk and South Circular Road, Rialto, Dublin 8 (ITM 713268.07, 733280.27) at an elevation of approximately 20 m above ordnance datum (m OD). The surrounding topography in general is relatively flat.

3.2 Geology

The Teagasc Soils Map indicates the site locality comprises urban sediment. Immediately underlying the site, and along tracks of the Luas to the east and west of the site, the Quaternary geology is classified as urban. The Quaternary geology to the north and south of the site is mainly comprised of till derived from the underlying limestone bedrock. A localised area of gravels derived from the underlying limestone bedrock is located to the north of the site.

The GSI Bedrock Geology Map (scale 1:100,000) indicates the site is underlain by marine basinal facies, a dark fine-grained limestone and shale of the Lucan formation. No geological features are noted within the surrounding area.

A number of geotechnical records are located within the vicinity of the site. Immediately north of the site an extensive site investigation was completed for works at St James's Hospital; the stratigraphic sequence is recorded as being top soil to approximately 0.3 metres below ground level (m bgl), overlying approximately 1.0 m of fill/made ground, which is underlain by clay to approximately 2.5 m bgl where the investigation terminated. Bedrock was not encountered.

A ground investigation report prepared by Roughan & O'Donovan for the National Children's Hospital immediately north of the site was also reviewed. Site investigations completed as part of this

assessment found that made ground was encountered at depths of up to 3.6 m bgl, underlain by boulder clay up to 19.3 m bgl. Bedrock was encountered at depths of 10.8 m bgl.

3.3 Hydrology

3.3.1 Surface Water Features

The site lies within the lower catchment of the River Liffey and Dublin Bay, which covers an area of 1624 km².

The closest surface water body to the site is the Grand Canal (a proposed Natural Heritage Area (pNHA), located approximately 300 m southwest of the site. The canal flows to the east and discharges to the River Liffey Estuary approximately 4 km east of the site, which flows into South Dublin Bay (an Area of Conservation (SAC)). As impervious materials are generally used to line canals during construction, it is not considered likely that the Grand Canal is in hydrological continuity with groundwater in the area. The South Dublin Bay SAC comprises the following protected sites:

- South Dublin Bay Special Area of Conservation (SAC) (Site Code 000210);
- South Dublin Bay and River Tolka Special Protection Area (SPA) (Site Code 004024); and
- South Dublin Bay proposed Natural Heritage Area (pNHA) (Site Code 000210).

The Camac River is located approximately 500 m north of the site and flows to the northeast into the River Liffey located approximately 1.1 km north of the site, which flows easterly into South Dublin Bay.

Given their proximity to the site, both the Grand Canal and Camac River are considered to be sensitive surface water receptors.

3.3.2 Surface Water Quality

The Grand Canal to the southwest of the site is referred to as an Artificial Water Body (AWB) by the EPA. Waterways Ireland assess the biological quality of the Grand Canal, which along the section adjacent to the site during the period 2015 – 2017 was classified as 'Good' quality¹.

The most recent reported EPA water quality status of the Camac River (monitoring station below Blackhorse Bridge) is a Q Value of 3 and a rating 'Poor'. The Water Framework Directive (WFD) ecological status of the Camac River is characterised as being 'at risk' of not meeting its WFD objectives.

The most significant surface water feature in the wider area is the River Liffey Estuary. The WFD status of both the upper and lower sections of the estuary (classified as a Transitional Water Body) is classified as 'Moderate' and characterised as being 'at risk' of not meeting its WFD objectives.

3.3.3 Flooding

According to OPW Flood Maps, the site does not lie within the "River – Low Probability", "River – Medium Probability" or "River – High Probability" modelled extent of land that might be flooded by rivers in a moderate to very extreme event.

Parts of the surrounding area located within a 1 km radius to the north and south of the site lie within the "River – Low Probability", "River – Medium Probability" and "River – High Probability" indicating that flooding by rivers may occur during moderate to very extreme event in these areas.

The site is not in close proximity to the extent of land affected by coastal flood events.

3.4 Hydrogeology

3.4.1 Aquifer Classification

According to the GSI, the bedrock aquifer beneath the site is classified as a Locally Important Aquifer which is Moderately Productive only in Local Zones. The soil permeability in the surrounding area is

¹ EPA, Water Quality in 2017, An Indicators Report, 2018

low; consequently the groundwater recharge in the aquifer is estimated by the GSI to be approximately 67 millimetres/year (mm/yr).

Regional groundwater flow direction is likely to be to the north towards the Camac River. A more detailed site assessment would be required to assess the local groundwater flow regime.

The closest groundwater wells and springs are located over 2 km southwest of the site.

The site is not mapped as being located within a Source Protection Area for either a public water supply or a group water supply scheme.

3.4.2 Groundwater Vulnerability

The GSI National Groundwater Vulnerability Mapping identified some spatial variation in groundwater vulnerabilities within the site area, varying from low to moderate. The site itself is within a localised area classified as high; however the surrounding area is classed as medium. The variation in vulnerability classification correlates to the variable depth and nature of overburden across the site.

3.4.3 Groundwater Quality

Groundwater beneath the site is part of the Dublin Groundwater Body (IE_EA_G_008) which, according to the WFD Ireland website, is classified as having 'Good' status and is characterised as being not at risk.

3.5 Natural Habitats and Protected Species

The Grand Canal, which lies approximately 300 m southwest of the site, is a pNHA throughout its course.

South Dublin Bay, which is approximately 4 km east of the site, is an SAC, SPA and pNHA. Site Codes for each of these protected areas are provided in Section 3.3.1.

3.6 Regulatory Database Search

3.6.1 National Waste Collection Permit Office

The National Waste Collection Permit Office (NWCPO) website was reviewed to identify authorised waste facilities within the jurisdiction of Dublin City County Council near the site. The NWCPO website indicated that there are no waste facilities within 1 km of the site.

3.6.2 Storm Water Discharges

Twenty-three Irish Water storm water overflow discharge locations have been identified within 1 km of the site, as summarised in Table 2 below.

Table 2 Storm Water Discharges

Emission ID	Name	Register No.
TPEFF0700D0034SW092	Ringsend	D0034-01
TPEFF0700D0034SW100	Ringsend	D0034-01
TPEFF0700D0034SW104	Ringsend	D0034-01
TPEFF0700D0034SW024	Ringsend	D0034-01
TPEFF0700D0034SW077	Ringsend	D0034-01
TPEFF0700D0034SW032	Ringsend	D0034-01
TPEFF0700D0034SW215	Ringsend	D0034-01
TPEFF0700D0034SW039	Ringsend	D0034-01
TPEFF0700D0034SW073	Ringsend	D0034-01

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Emission ID	Name	Register No.
TPEFF0700D0034SW275	Ringsend	D0034-01
TPEFF0700D0034SW076	Ringsend	D0034-01
TPEFF0700D0034SW055	Ringsend	D0034-01
TPEFF0700D0034SW056	Ringsend	D0034-01
TPEFF0700D0034SW057	Ringsend	D0034-01
TPEFF0700D0034SW058	Ringsend	D0034-01
TPEFF0700D0034SW059	Ringsend	D0034-01
TPEFF0700D0034SW201	Ringsend	D0034-01
TPEFF0700D0034SW030	Ringsend	D0034-01
TPEFF0700D0034SW044	Ringsend	D0034-01
TPEFF0700D0034SW022	Ringsend	D0034-01
TPEFF0700D0034SW231	Ringsend	D0034-01
TPEFF0700D0034SW051	Ringsend	D0034-01
TPEFF0700D0034SW052	Ringsend	D0034-01

3.6.3 EPA Licensing

The EPA database of Industrial Emissions (IE) and Integrated Pollution Control (IPC) and Waste licences was consulted and no active licensed facilities were identified within 1 km of the site.

According to the EPA website there have been no reported environmental incidents within Dublin 4 from at least 2010.

3.7 Environmental Sensitivity

The overall environmental sensitivity of the site is considered to be moderate. Identified sensitive receptors within 1 km of the site include:

- The Grand Canal located 300 m southwest of the site, although this may be protected by low permeability clay (natural and/or engineered when the canal was constructed);
- The Camac River located 500 m north of the site, although this may be protected by low permeability clay deposits; and
- The groundwater aquifer beneath the site, although this may be protected by low permeability clay deposits.

4. Source Audit Findings

4.1 Site Description

The location of the leak is situated at the junction of James Walk and South Circular Road, Rialto, Dublin 8. The site is located on a 400 m long section of a 38 kV cable running from Inchicore to Marrowbone Lane. The cable was installed in 1950 and the location of the leak (at cable joint UG6032 – UG630 (0.25 km)) is located beneath James Walk (ITM 713268.07, 733280.27) (see Figure 2). It is estimated that the cable loss of fluid from the cable occurred between February 2009 and November 2009 with an estimated fluid volume loss of 1,105 Litres during that period.

No evidence of impact from the cable fluid release was noted during the site walkover.

4.2 Surrounding Land Use

Land use in the immediate vicinity of the site is a mixture of commercial and residential, as summarised in Table 3.

Table 3 Adjacent Land Use

Site Boundary	Land Use
North	The Red Line Luas is located immediately north of the site, St James's Hospital and the site of the new National Children's Hospital is located approximately 40 m north of the leak location. Trees and grassed areas are located either side of the Luas line. Residential houses are located northeast of the site opposite the site of the National Children's Hospital.
East	Land use to the east of the site is predominantly residential with gardens and some small commercial properties. A small path runs adjacent to the Luas line in an eastern direction behind the residential properties, with grassed areas either side of this path.
South	Immediately south of the site are residential properties and some small commercial properties with residential properties above.
West	The Rialto Luas stop is located approximately 130 m west of in the leak location. A mix of residential properties and commercial are located to the west.

4.3 Historic Site Review

A review of historical maps and aerial photographs available from OSI, Glucksman Map Library (Trinity College Dublin) and Google Earth was completed. A summary of the findings is presented in Table 4.

Table 4 Historic Map and Aerial Photograph Review

Year	Description
1829 to 1841 (OSI)	The site and immediate surrounding area appears to be predominantly agricultural, the junction of James's walk is present, with the Harcourt Bridge crossing a section of the Grand Canal (now infilled) immediately north of the site. Small buildings are located to the east and the west of the site.
1888 to 1913 (OSI)	Significant residential developments have been carried out with buildings present immediately adjacent to the leak location. To the north of the site Kilmainham Sheds (South Union Workhouse) are now located. The bridge located immediately north of the leak is now noted as Rialto Bridge. To the east of the site is Rialto Park.
	No significant developments have occurred. Further east of the site from Rialto Park, a distillery is located.
1907-8 (1:2,500) Trinity Maps	No significant developments have occurred.
1943 (1:1,250) Trinity Maps	Significant residential developments have occurred in the vicinity of the site. Kilmainham Sheds (South Union Workhouse), now Rialto Hospital and Catholic Church with associated pump house, is located north of the site.
1989 (1:1000) Trinity Maps	The area surrounding the site remains densely populated with residential dwellings. Rialto Hospital, now St James's Hospital, is located north of the site with associated electrical stations and tanks.
1995 (OSI)	Extensive development of the surrounding area is shown on the 1995 aerial photograph. The area in the vicinity of the site appears to be primarily residential with a car park and buildings immediate north of the leak location.
2000 (OSI)	Some minor changes to the site have occurred since 1995. Construction work is occurring to the east at St James's Hospital.
2005	No changes have appeared to have occurred since 2000.

Year	Description
(OSI)	
2012 (Google Earth)	No changes have appeared to have occurred since 2005.

4.4 Potential Sources

4.4.1 Cable Fluid Source

Information on the potential fluids released was provided in the ESB RFP document. Typically, fluid filled cables are installed in trenches approximately 1.2 m deep, 1.1 m wide and the depth to the top of the cable is typically 0.9 m - 1 m. The cables are typically surrounded by 0.35 m of sand and then the trench is backfilled with either clause 804 fill or trench arisings.

Based on information from the GSI, it is likely that the cable on this site is installed within sand and backfilled with made ground, therefore leaked fluid is likely to have migrated through either the sand surround or made ground (if sufficient permeability).

It is estimated that 1,105 litres of cable fluid was released between February 2009 and November 2009. As the leak size is greater than the circuit volume (10,606 litres), it is possible that the original fluid that was present when the cable was installed could potentially still be present.

It is assumed, based on records and Safety Data Sheets (SDS) provided to AECOM by ESB, that the fluid lost was a mixture of the following cable fluid products:

- 'T 3788' manufactured by H&R ESP Ltd of Milton Keynes in the UK;
- 'Masse 106' produced by Felten & Guilleaume Energietechnik AG in Germany; and
- Shell Diala Cable Oil.

T 3788 is a low viscosity blend of linear alkyl benzenes (LABs) (CAS # 67774-74-7). Shell Diala Cable Oil has the same CAS # as T 3788, so is essentially the same product but made by a different manufacturer. The SDS for Masse 106 does not give its CAS # or details of its composition but states that it is a blend of highly refined mineral oils and additives.

4.4.1.1 Linear Alkyl Benzenes (LABs)

Physical and Chemical Properties

LABs have side alkyl chains of 10-13 carbon atoms in length attached to a benzene ring. The alkyl chain may be attached to the benzene ring at any position except the terminal (end) position. As LABs are a mixture, their precise physio-chemical properties are dependent upon the components of the mixture, but they are generally colourless, oily liquids, less dense than water, with very low aqueous solubility and low volatility. Their potential spreading in the ground will therefore be similar to other light non-aqueous phase liquids (LNAPL) but with very little mass loss due to volatilisation or dissolution.

Information relating to the nature and toxicity of linear alkyl benzenes has been primarily sourced from the following documents:

- Safety Data Sheet (SDS) for T 3788;
- European Union Risk Assessment Report, Benzene, C10-13 alkyl derivatives, 20 June 1997; and
- Organisation for Economic Co-operation and Development (OECD) Screening Information Datasets (SIDS) Initial Assessment Reports for High Production Volume Chemicals, United Nations Environment Programme, Chemicals Branch, May 2002.

The table below summarises the basic physical and chemical properties of LABs.

Property	Description
Molecular Weight	239-243 g/mol
Melting Point	<-70°C
Boiling Point	251-320°C @ 1 atm (OECD)
Vapour Pressure @ 25°C	6.5 x 10 ⁻⁵ kPa (OECD)
Aqueous Solubility	0.041 mg/L (OECD)
Henry's Law Constant	9.34 x 10 ⁻⁴ atm-m ³ /mol (OECD)
Density	0.86 @ 20°C
Flash Point	140°C
Explosive Properties	None

Table 5 Linear Alkyl Benzene Physical and Chemical Properties

LAB (C12) has a calculated octanol-water partition coefficient (Koc) of 2.2x10⁴ and is classified by the EU risk assessment as a high adsorptive substance.

Degradation

The OECD SIDS (2002) review concluded that LABs undergo "rapid primary biodegradation in natural waters and complete mineralisation by micro-organisms under aerobic conditions". A measured half-life in water of four to nine days was reported. Microorganisms in sewage sludge and soil were reported to rapidly and completely biodegrade LABs. Anaerobic biodegradation was inferred to occur, but at a slow rate.

Degradation in soil is expected to occur but to be slower than in surface water due to the much slower mixing and the limited availability of oxygen. Where oxygen is available, aerobic degradation would occur at the fringes of a body of LNAPL in the soil/groundwater, producing elevated carbon dioxide levels in the soil and potentially elevated alkalinity in the groundwater. In the absence of oxygen, anaerobic degradation may occur by methanogenesis or by reduction of sulphate, nitrate, ferric iron (Fe³⁺) and manganese (Mn³⁺). These processes could lead to reducing conditions in the groundwater, with depleted concentrations of sulphate (SO₄⁻) and nitrate (NO₃⁻) and increased concentrations of dissolved methane (CH₄), ferrous iron (Fe²⁺) and dissolved manganese (Mn²⁺). Such conditions would be expected to occur close to the LNAPL body and locally downgradient. With increased distance from the LNAPL, mixing with the surrounding groundwater and aeration from seasonal fluctuations and groundwater recharge would gradually allow ambient (most likely oxidised) conditions to be re-established.

Toxicity

According to the OECD review, LABs were assessed to be not acutely toxic to human health. Data from repeat exposure, reproductive and genotoxicity studies also indicated a low potential for toxic effects. The OECD concluded that "Linear alkyl benzenes do not present any significant acute or sub-chronic health effects by various exposure routes. LAB is not teratogenic (i.e. causing birth defects) and does not produce selective reproductive toxicity."

Laboratory studies have shown that repeated exposure to LABs may be irritating to the skin, and the SDS recommends the use of gloves when handling LABs. The low vapour pressure of LABs limits the potential for exposure via inhalation, and this is not expected to be a significant exposure route at normal temperatures.

Eco-toxicity studies reviewed by the OECD found no acute toxic effects on aquatic species tested at concentrations up to and exceeding solubility limits. The only exception to this was for the water flea Daphnia magna. No data was available regarding terrestrial eco-toxicity studies.

Due to its high biodegradability and rapid metabolism, the OECD concluded that LABs were of little concern for adverse environmental impact. The OECD and EU reviews of LABs both concluded that LABs were a low priority for further investigation.

4.4.1.2 Masse 106 Mineral Oil

Information on Masse 106 has been obtained from a Safety Data Sheet (SDS) dated 1995 provided by ESB.

Physical and Chemical Properties

Masse 106 is understood to be a blend of highly refined mineral oils and additives. The SDS does not provide information on the identity of the mineral oils or additives, or on their proportions within the oil.

The SDS states that containers of Masse 106 should be kept tightly closed and in a well-ventilated space and that it should be used only in well-ventilated areas. This suggests that Masse 106 may contain volatile components.

The table below summarises information from the SDS for Masse 106.

Property	Description
Vapour Pressure @ 20°C	<0.01 hPa
Aqueous Solubility	negligible
Density	888 kg/m ³
Flash Point	145°C
Flammability range	0.6% volume to 6.5% volume
Kinematic viscosity@ 40°C	8.5 mm ² /s

Table 6 Masse 106 Physical and Chemical Properties

Based on these properties, Masse 106 would behave as a relatively viscous LNAPL in the ground. The SDS states that if the product enters soil it will be adsorbed to soil particles and not be mobile.

Degradation

The SDS for Masse 106 indicates that it is not readily biodegradable. Nevertheless, as it is expected to be comprised mainly of petroleum hydrocarbon compounds, gradual degradation is expected to occur, especially in water. The rate of biodegradation is likely to depend on the availability of oxygen and of favourable geochemical conditions. As with LABs and with other petroleum hydrocarbons, where oxygen is available, aerobic degradation would be expected to occur at the fringes of a body of LNAPL in the soil/groundwater, producing elevated carbon dioxide levels in the soil and potentially elevated alkalinity in the groundwater. In the absence of oxygen, anaerobic degradation may occur by methanogenesis or by reduction of sulphate, nitrate, ferric iron (Fe³⁺) and manganese (Mn³⁺). These processes could lead to reducing conditions in the groundwater, with depleted concentrations of sulphate (SO₄⁻) and nitrate (NO₃⁻) and increased concentrations of dissolved methane (CH₄), ferrous iron (Fe²⁺) and dissolved manganese (Mn²⁺). Such conditions would be expected to occur close to the LNAPL body and locally downgradient. With increased distance from the LNAPL, mixing with the surrounding groundwater and aeration from seasonal fluctuations and groundwater recharge would gradually allow ambient (most likely oxidised) conditions to be re-established.

Toxicity

The 1995 SDS for Masse 106 states that the components of the preparation are not expected to impart hazardous properties to the product. Whilst this suggests the product is not hazardous, it is noted that standards for hazard assessment and SDS production have evolved since 1995 and therefore the information cannot be relied upon with full confidence in relation to current standards for hazard assessment.

The SDS indicates that Masse 106 is expected to be practically non-toxic to aquatic organisms.

In relation to human toxicity, the SDS gives the following information:

- It is expected to be slightly irritant, so all forms of skin contact should be minimised. It is not expected to be a skin sensitiser.
- Respiratory protection is not normally required but it should be used only in well-ventilated spaces. It is based on mineral oils and other components not known to be carcinogenic.

4.4.1.3 Conclusion

Based on the above, underground leakage of LABs is not likely to lead to significant issues from dissolved hydrocarbons or vapours. Although the components of Masse 106 are not known and its aqueous solubility is stated on the SDS as "negligible", it is unclear what this means in the context of dissolution of components from a NAPL. Based on the requirement for it to be used only in well-ventilated spaces, it appears that Masse 106 contains some relatively volatile components.

The main concern from LABs and a concern also for mineral oils such as Masse 106 is the potential for them to migrate and spread as a LNAPL, downwards through unsaturated soil that is present and then laterally in the vicinity of the groundwater table. The extent of LNAPL migration will depend on the properties of the surrounding soil and on the saturation and pressure distribution within the LNAPL. These in turn would depend on the quantity of cable fluid lost and the timescale over which the leakage occurred.

Vapour impacts are considered to be unlikely from LABs but could be of concern for Masse 106.

Degradation of the cable fluid may lead to the generation of ground gas (including carbon dioxide and methane) and affect groundwater chemistry in the vicinity and locally downgradient of the LNAPL.

Given that a mixture of LABs and a mineral oil based cable fluid have been used in the past, potential contaminants of concern associated with mineral oil based fluids would include the following:

- Total Petroleum Hydrocarbons (TPH);
- Benzene, toluene, ethylbenzene and xylene (BTEX) compounds;
- Volatile organic compounds (VOCs);
- Semi volatile organic compounds (SVOCs); and
- Polychlorinated biphenyls (PCBs).

4.4.2 Potential Off-Site Sources of Contamination

Based on a review of historic maps and the current site setting, land use surrounding the site has been principally residential and commercial. The following potential off-site sources of contamination have been identified as part of the assessment works completed:

- Current and historic industrial practices in the vicinity of the site;
- Fill materials (likely to be up to 3 m bgl) present in the surrounding area; and
- Fuel / chemicals (e.g. for back-up generators) present in industrial buildings around the site.

4.5 Source Audit Summary

Based on the assessment works completed, the primary Area of Potential Environmental Concern (APEC) for this site comprises the leak location identified by ESB. This is presented in Figure 2 and a description is provided in Table 7.

Table 7 Area of Potential Environmental Concern

1 Leak at (31) Inchicore – Marrowbone Lane 38 kV LABs Soil (February 2009 – November 2009) TPH Groundwater BTEX Soil Vapour VOCs Ground Gas SVOCs PCBs	Number	APEC	Potential Contaminants of Concern	Potential Media Impacted
	1		TPH BTEX VOCs	Groundwater Soil Vapour

Other potential off-site sources have also been identified based on the type of activity. However, no information is available for these sites therefore the only APEC assessed herein is the leak site beneath James's Walk and South Circular Road.

5. Conceptual Site Model

A preliminary Conceptual Site Model (CSM) has been developed identifying potential contaminant sources, contaminant migration pathways and potential receptors.

In the context of land contamination, there are three essential elements to any risk:

- A **source** a substance that is in, on or under the land and has the potential to cause harm or to cause pollution of controlled waters;
- A **receptor** in general terms, something that could be adversely affected by a contaminant, such as people, an ecological system, property, or a water body; and
- A **pathway** a route or means by which a receptor can be exposed to, or affected by, a contaminant.

Each of these elements can exist independently, but they create a risk only where they are linked together, so that a particular contaminant affects a particular receptor through a particular pathway. This kind of linked combination of contaminant–pathway–receptor is described as a pollutant linkage. The preliminary CSM was developed to describe viable source-pathway-receptor (SPR) linkages for the site, which are presented in Table 12 below.

By considering potential SPR linkages, an assessment of the human health and environmental risks is made with reference to the significance and degree of the risk. The risk assessment has been undertaken with reference to BS10175-2011 + A2 2017 and CIRIA Document C552: 'Contaminated Land Risk assessment - A Guide to Good Practice' (2001).

The preliminary risk assessment completed for this site is based on consideration of whether a potential source of contamination can reach a receptor, and hence whether it is of major or minor significance. Considering that assessment works are still at preliminary stage and no intrusive investigation work has been completed, development of the preliminary CSM and assessment of potential risk is based on information provided by ESB on the nature of the leak, and on the AECOM site reconnaissance and desk based study. As such, only a qualitative assessment can be made around potential risks to receptors. This means that identification of potential risk does not necessarily indicate a risk to a receptor, rather that further assessment may be required to investigate assumptions made in the CSM and quantify whether a potential risk actually exists.

5.1 Qualitative Risk Assessment Methodology

A qualitative risk assessment has been carried out by assessing the severity of the potential consequence, taking into account both the potential severity of the hazard and the sensitivity of the target, based on the categories given in Table 8 below.

Table 8 Potential Hazard Severity Definition

Category	Definition
Severe	Acute risks to human health, catastrophic damage to buildings/property, major pollution of controlled waters.
Medium	Chronic risk to human health, pollution of sensitive controlled waters, significant effects on sensitive ecosystems or species, significant damage to buildings or 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 9 below.

Table 9 Probability of Risk Definition

Category	Definition
High likelihood	Pollutant linkage 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 the 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 shown in the table below.

Table 10 Level of Risk for Potential Hazard Definition

Potential Severity

Probability of Risk	Severe	Medium	Mild	Minor
High	Very high	High	Moderate	Low/Moderate
Likely	High	Moderate	Low/Moderate	Low
Low	Moderate	Low/Moderate	Low	Very low
Unlikely	Low/Moderate	Low	Very low	Very low

A description of the levels of risk outlined in Table 10 is provided in the following table:

Level of Risk	Description
Very High Risk	There is a high probability that severe harm could arise to a designated receptor from an identified hazard, or there is evidence that severe harm to a designated receptor is currently happening.
	This risk, if realised, is likely to result in substantial liability.
	Urgent investigation and remediation are likely to be required.
High Risk	Harm is likely to arise to a designated receptor from an identified hazard.
	Realisation of the risk is likely to present a substantial liability.
	Urgent investigation is required and remedial works may be necessary in the short term and are likely over the long term.
Moderate Risk	It is possible that harm could arise to a designated receptor from an identified hazard. However, it is either relatively unlikely that any such harm would be severe, or if any harm were to occur it is more likely that the harm would be relatively mild, if realised.
Low Risk	It is possible that harm could arise to a designated receptor from an identified hazard, but it is likely that this harm, if realised, would at worst normally be mild.
Very Low Risk	There is a low possibility that harm could arise to a receptor. In the event of such harm being realised it is not likely to be severe.

Table 11 Description of the Classified Risks and Likely Action Required

5.2 Preliminary CSM Assumptions

Based on the findings of the desktop study and information provide in the RFP by ESB, the following assumptions made in development of the CSM:

- The fluid assumed (based on records provided) to have leaked from the cable is a mixture of LAB and a mineral oil based cable fluid;
- The leak is assumed to have occurred at a depth less than 2 m below ground;
- The geology beneath the site is assumed to comprise approximately 3 m of made ground underlain by clay up to a depth of 10 m bgl. Limestone bedrock is assumed to be present at a depth of approximately 10 m bgl;
- Groundwater is assumed to be present at relatively shallow depths within the made ground;
- It is assumed that there is no direct connection between the site and surface water bodies;
- Other below ground utilities including mains water are assumed to be present in the vicinity of the site; and
- It is assumed that commercial buildings and residential houses adjacent to the site do not have basements.

The preliminary CSM is presented graphically in Figure 3.

Table 12 Conceptual Site Model

Source	Pathway	Receptor	Severity	Likelihood	Potential Risk	Discussion
LAB / Volatile TPH and VOC concentrations in soils	Inhalation of vapours which have migrated from the ground to above ground buildings.	Site users in a commercial/low to high density residential scenario.	Medium	Low Likelihood	Low / Moderate	Based on records provided, a mixture of LAB and mineral oil is assumed to be the cable fluid used. The low vapour pressure of LABs limits the potential for exposure via inhalation, and this is not expected to be a significant exposure route at normal temperatures. It is considered that there is a low to moderate risk from the inhalation of vapours from potential mineral oil-based products present beneath the site. Further assessment would be required to fully evaluate this potential risk.
NAPL and non- volatile TPH, VOC, SVOC and PCB concentrations	Soil and dust ingestion from near surface soils. Dermal contact with near surface soils. Inhalation of fugitive dust from near surface soils.	Site users in a commercial/low to high density residential with plant uptake scenario.	Medium	Unlikely	Low	Based on the volume of cable fluid released and the assumed mixture of cable fluid used in the past, it is possible that a mineral based cable fluid may have migrated beneath low density residential houses with gardens or public open space in the vicinity of the site. Given the likely depth to the cable, surface soils are unlikely to be affected and exposure via this pathways is not considered likely.
in soils	Ingestion of soils via consumption of vegetables grown in near surface soils.	Intrusive site workers.	Minor	Likely	Low	Workers carrying out intrusive works adjacent to the site may come into contact with mineral oil based NAPL and impacted soil, meaning there will be a requirement to wear personal protective equipment to mitigate against potential impacts. Given the relatively low toxicity of LABs (assessed to be not acutely toxic), exposure to LABs is not considered to represent a significant risk.
NAPL and TPH, VOC, SVOC and PCB concentrations in soils	Migration of ground gas generated from the degradation of the cable fluid to above ground buildings.	Site users in an industrial/commercial/low to high density residential scenario.	Severe	Low Likelihood	Moderate	If a significant source of NAPL (LAB or mineral oil) is present on groundwater, there is potential for ground gas to be generated from degradation processes. The likelihood of ground gas being generated in significant quantities is considered to be low, however given the potential severity of the impact, further assessment would be required to fully evaluate this potential risk.

Source	Pathway	Receptor	Severity	Likelihood	Potential Risk	Discussion
NAPL and TPH, VOC, SVOC and PCB concentrations in soils	Permeation of LAB NAPL through plastic water supply pipes.	Site users in a commercial/low to high density residential with plant uptake scenario.	Medium	Unlikely	Low	Public water mains likely to be present in the vicinity of the leak, servicing commercial and residential properties have the potential to be impacted. With respect to LABs, the WHO drinking water guideline (DWG) for the relevant aromatic fraction ² is 0.09 mg/l and as the solubility limit of LAB is 0.041 mg/L (OECD) i.e. less than the DWG, LAB cannot dissolve into the water supply above this level. Furthermore, water will be moving rapidly in the pipe under pressurised conditions making it unlikely to reach the solubility limit. In respect of the potential presence of mineral oil, the aqueous solubility of the known product used (Masse 106) is stated on the SDS as "negligible". It is unclear what this means in the context of dissolution of components from a NAPL. ESB has consulted with Irish Water (statutory body responsible for water supply) regarding the potential risk for cable fluid present in the vicinity of water supply pipes. Following review of their records, AECOM understands that Irish Water do not have concerns regarding impact of water supplies from cable fluid leaks. It is therefore considered that the potential risk of a pollutant linkage being present is low. As a precaution, investigation works should be carried out as part of future assessment works to further assess this source-pathway-receptor linkage.
NAPL and TPH, VOC, SVOC and PCB concentrations in soils	Migration of potential contaminants along preferential flow pathways such as underground services and permeable backfill around the electricity cable.	Nearby surface water bodies including the River Camac and the Grand Canal.	Medium	Unlikely	Low	It is understood that the leak at this location was repaired in November 2009. Given that there has been no reported evidence of impact or incidents of cable fluid release in nearby surface water bodies, it is likely that NAPL released from the cable has stabilised over the 10-year period since the leak was repaired and risk to surface water bodies is low.
NAPL and TPH, VOC, SVOC and PCB concentrations in soils	Migration of potential contaminants along preferential flow pathways such as underground services and permeable backfill around the electricity cable, and consequently vapour inhalation and / or ingestion, dermal contact.	Site users in a commercial/low to high density residential with plant uptake scenario.	Medium	Low Likelihood	Low / Moderate	Likely to be a high concentration of services present in the vicinity of the leak given the urban setting. If the soil / made ground around the leak is generally clay, the leaking fluid will likely have migrated mainly along any permeable backfill around the cable. The cable fluids used are likely to absorb strongly to aquifer materials (made ground and clay), consequently the potential for migration over significant distances is considered to be low to moderate. Further assessment would be required to fully evaluate this potential risk.

Source	Pathway	Receptor	Severity	Likelihood	Potential Risk	Discussion
NAPL	Migration in saturated and unsaturated soil.	Groundwater beneath the site.	Medium	Likely	Moderate	Considering the volume of cable fluid released over the 10-month leak period, it is considered likely that shallow groundwater has been impacted. Impacts could occur due to the presence of NAPL and associated biodegradation products. Further works would be required to assess for the presence of NAPL in the vicinity of the leak location and fully evaluate this potential risk.
Dissolved phase leaching from NAPL or from soils containing elevated concentrations of TPH, VOCs, SVOCs and PCBs	5	Groundwater in superficial deposits beneath the site.	Medium	Likely	Moderate	Considering the volume of cable fluid released over the 10-month leak period, it is considered highly likely that shallow groundwater has been impacted. Further assessment would be required to quantify any impact from the presence dissolved phase contamination in groundwater.
LAB, TPH,	contaminants through groundwater. Horizontal migration of contaminants through groundwater to nearby surface water receptors.	Groundwater in limestone bedrock aquifer beneath the site.	Medium	Low Likelihood	Low / Moderate	Information on the local geology indicates the presence of underlying stiff clay, which would reduce vertical migration of groundwater to the bedrock aquifer. Further assessment would be required to fully evaluate this potential risk.
VOC, SVOC and PCB concentrations in groundwater		Off-site surface water bodies including the Camac River and the Grand Canal.	Medium	Low Likelihood	Low / Moderate	The potential risk to nearby surface water bodies is considered low to moderate due to distance to receptor and dilution at receptor. Further assessment would be required to fully evaluate this potential risk. Given the canal is likely lined with impermeable material, the likelihood of horizontal migration through to the canal waters is considered low. Further assessment would be required to fully evaluate this potential risk.

6. Conclusions

AECOM completed a Preliminary Site Assessment of the site located at South Circular Road, Dublin 8. The objective of the works was to identify potential risks to human health and the environment that may be associated with a fluid leak from the identified location.

Based on the findings of the desktop study, the overall environmental sensitivity of the site is considered to be moderate. Identified sensitive receptors within 1 km of the site include:

- The Grand Canal located 300 m southwest of the site, although this may be protected by low permeability clay (natural and/or engineered when the canal was constructed);
- The Camac River located 500 m north of the site, although this may be protected by low permeability clay deposits; and
- The groundwater aquifer beneath the site, although this may be protected by low permeability clay deposits.

It is estimated that 1,105 litres of cable fluid was released between February 2009 and November 2009. It is assumed, based on information provided to AECOM by ESB, that the fluid lost was a mixture of LAB and mineral oil based products. Due to its high biodegradability, lower volatility and low solubility, it is considered that LABs are of less concern for adverse environmental impact than mineral oil based products. Given that there is potential for a mixture of both types of cable fluids to have been used at this site, potential contaminants of concern have been identified. A summary of the source audit findings is as follows:

Table 13 Area of Potential Environmental Concern

Number	APEC	Potential Contaminants of Concern	Potential Media Impacted
1	Leak at (31) Inchicore – Marrowbone Lane 38 kV (February 2009 – November 2009)	LABs TPH	Soil Groundwater
	(rebruary 2005 – November 2003)	BTEX	Soil Vapour
		VOCs SVOCs PCBs	Ground Gas

The preliminary CSM developed for the site looked at potential source-pathway-receptor linkages identified during the assessment works and identified a moderate potential risk to the following receptors:

- Site users due to the potential for ground gas generation resulting from degradation of NAPL (if present); and
- Shallow groundwater due to potential impact to groundwater chemistry from the presence of NAPL and associated biodegradation products.

A low to moderate risk was identified to site users from the potential for vapour migration from mineral oil based cable fluid.

A low to moderate risk was identified to nearby surface water bodies via potential migration of cable fluid on groundwater. In addition, potential impact to the deeper groundwater aquifer was considered to be low to moderate due to the geology beneath the site.

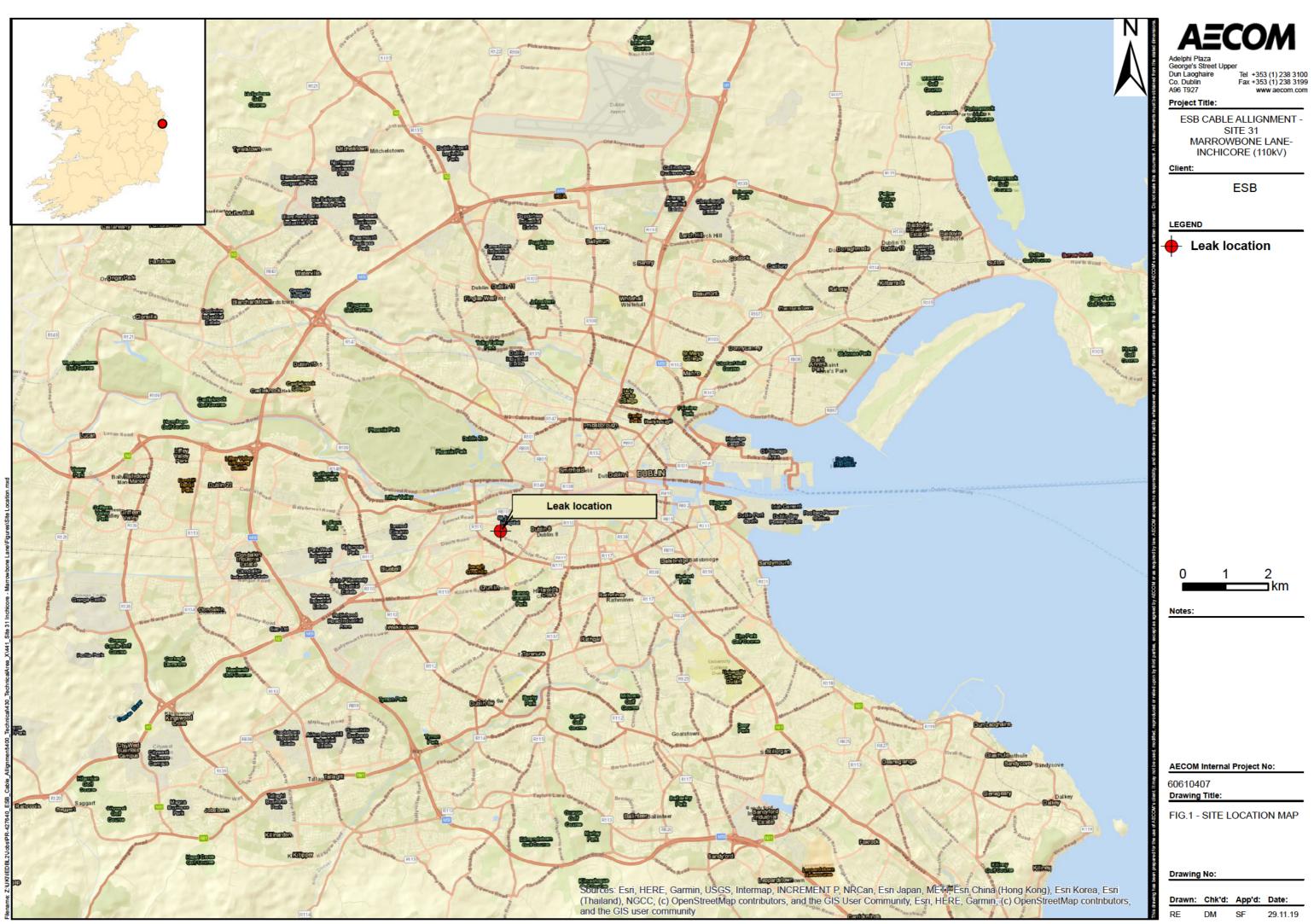
Risks associated with other potential source-pathway-receptor linkages were considered to be low.

The risk assessment completed herein is preliminary in nature as it can only be based on an evaluation of qualitative data sources (i.e. not on intrusive site investigation works). Consequently, identification of potential risk does not necessarily indicate a risk to a receptor, rather that further assessment may be required to investigate assumptions made in the CSM and quantify whether a potential risk actually exists. Generally, where a low or very low risk has been identified further assessment may not be deemed necessary to assess a particular SPR linkage, although further assessment may be deemed

to be required to investigate CSM assumptions where the potential risk is considered to be low or very low due to the sensitivity of the receptor.

Figures

Figure 1. Site Location Plan Figure 2. Areas of Potential Environmental Concern Figure 3. Conceptual Site Model



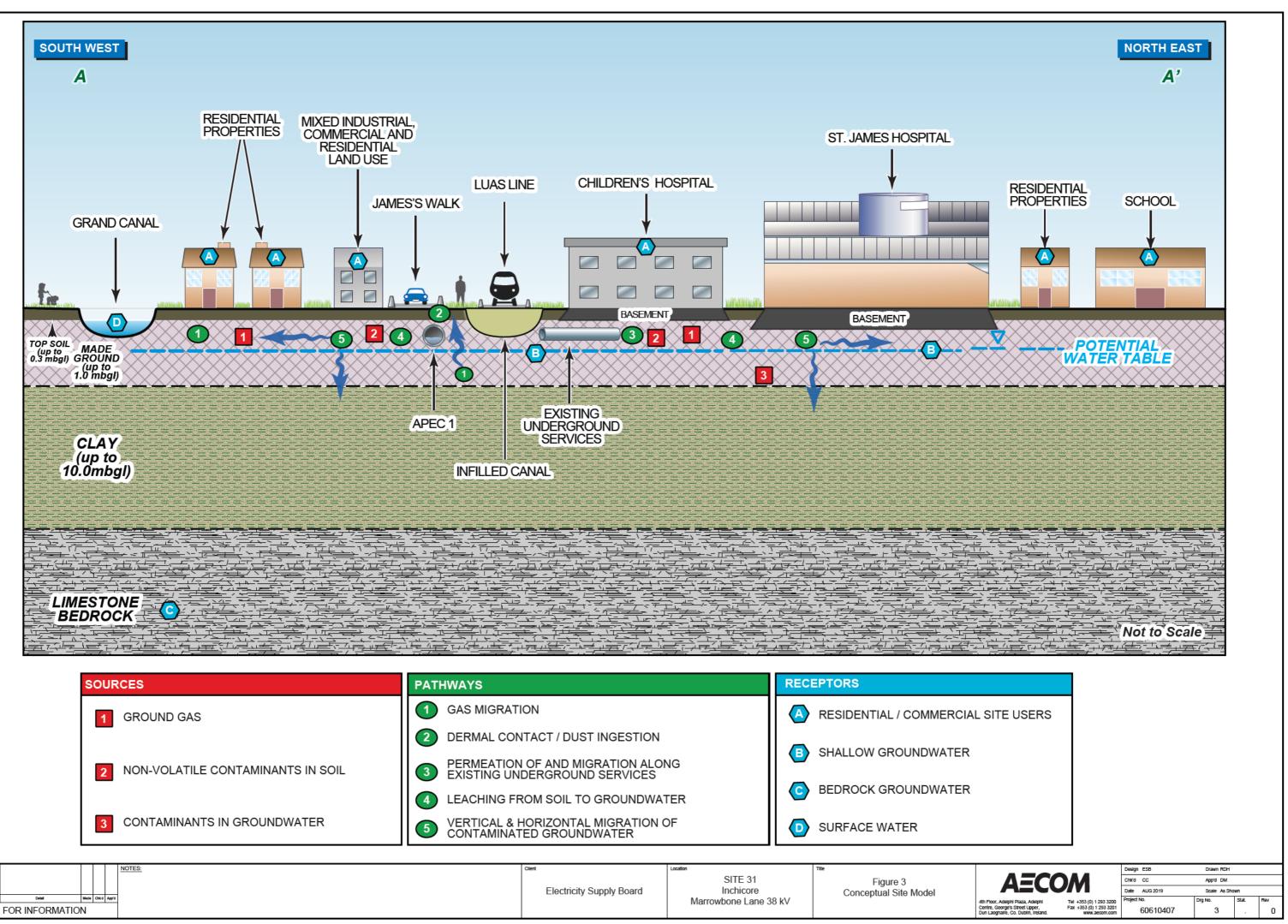
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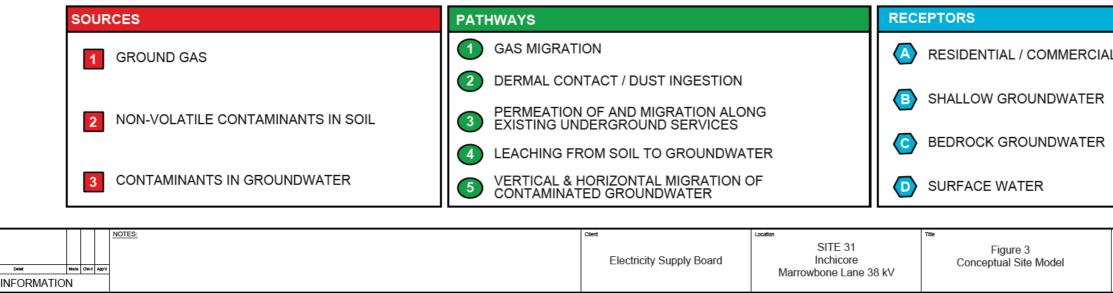


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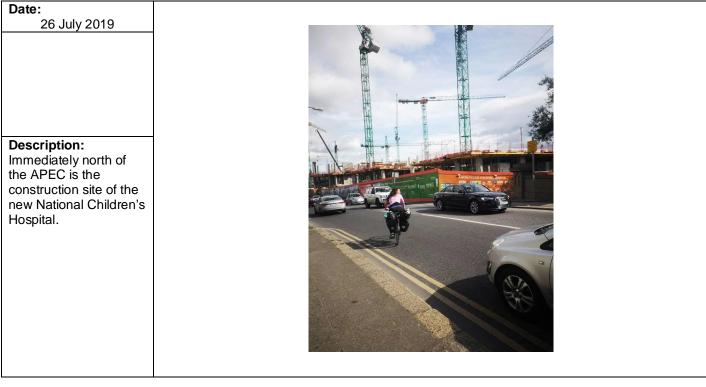




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Appendix A Site Photographs

AECOM		PHOTOGRAPHIC LO	
Client Name: ESB	Site Location: Site 31: Inchicore – Marrowbone Lane	Project No. PR-427640	
Date: 26 July 2019 Description Services located immediately west of the APEC on the junction of James's Walk.	<image/>		
Date:			



AECOM	AECOM PHOTOGRAPHIC LO	
Client Name: ESB	Site Location: Site 31: Inchicore – Marrowbone Lane	Project No. PR-427640
Date: 26 July 2019 Description Services and general litter along the west of the cable line adjacent		
to the Luas tracks.		
Date: 26 July 2019 Description: Small track along the cable route to the west of the APEC. Residential houses and gardens are to the north of the cable route and the Luas line and grassy areas are to the south.		

AECOM PHOTOGRAPHIC LOG		
Client Name: ESB	Site Location: Site 31: Inchicore – Marrowbone Lane	Project No. PR-427640
Date: 26 July 2019 Description Track along the western boundary of the APEC facing east.		
Date:		
26 July 2019 Description: Residential housing and gardens to the north of the western cable route.	ATTERNAL OF	

AECOM	PHOTOGRAPHIC LOG	
Client Name: ESB	Site Location: Site 31: Inchicore – Marrowbone Lane	Project No. PR-427640
Date: 26 July 2019 Description Luas tracks to the south of the western cable route. Luas lines run adjacent to entire length of cable line.		
Date: 26 July 2019 Description: View of the overgrown tarmac track along the western boundary of the cable route.		

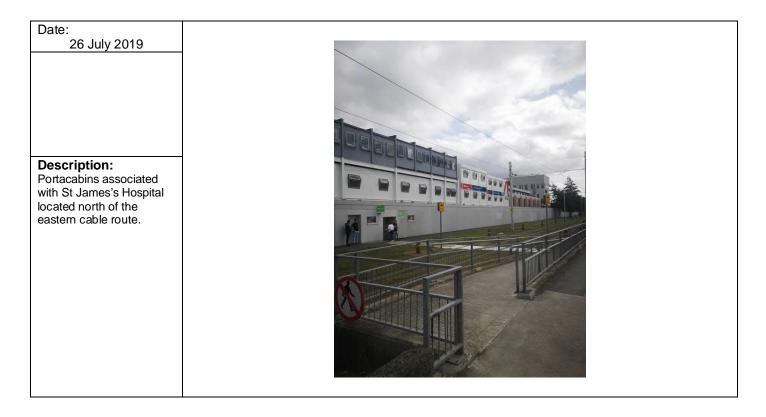
AECOM	Ph	PHOTOGRAPHIC LOG	
Client Name: ESB	Site Location: Site 31: Inchicore – Marrowbone Lane	Project No. PR-427640	
Date: 26 July 2019 Description Bridge at the junction, Luas line running beneath the bridge, with some vegetation either side.			
Date: 26 July 2019			
Description: Side of the bridge			

Side of the bridge immediately east of the APEC.



AECOM	COM PHOTOGRAPHIC LOG	
Client Name: ESB	Site Location: Site 31: Inchicore – Marrowbone Lane	Project No. PR-427640
Date: 26 July 2019 Description Location of the APEC from the east.		
Date: 26 July 2019 Description: Services and pavement along the eastern cable route along James's Walk and the Luas line to the north of the cable route.	<image/>	

AECOM	ECOM PHOTOGRAPHIC L	
Client Name: ESB	Site Location: Site 31: Inchicore – Marrowbone Lane	Project No. PR-427640
Date: 26 July 2019 Description At the western boundary		
of the cable route viewing east along James's Walk. Residential housing with jardens are located to the outh of the cable with the uas line to the north.		



AECOM	COM PHOTOGRAPHIC LOG	
Client Name: ESB	Site Location: Site 31: Inchicore – Marrowbone Lane	Project No. PR-427640
Date: 26 July 2019 Description Service along James's Walk at the eastern boundary of the cable route.		
Date: 26 July 2019 Description: Residential housing and small commercial units located south of the APEC.		

AECOM	M PHOTOGRAPHIC LOG	
Client Name: ESB	Site Location: Site 31: Inchicore – Marrowbone Lane	Project No. PR-427640
Date: 26 July 2019		
Description Services along the eastern cable route facing towards the APEC.		
Date: 26 July 2019 Description: Small track located west of the APEC to the south of the Luas track.		

Appendix B PSA Template Report Table of Contents Cross Reference

EPA Template Table of Contents	Production Area Preliminary Site Assessment Report
Executive Summary	Executive Summary
1. Introduction	Section 1
1.1 Project Contractual Basis & Personnel Involved	Section 1
1.2 Background Information	Section 1.1
1.3 Project Objectives	Section 1.2
1.4 Scope of Works	Section 2
2. Source Audit Findings	Section 4
2.1 Current Site Operations	Section 4.1 to Section 4.2
2.2 Previous Site Operations	Section 4.3
2.3 Chemicals of Potential Concern	Section 4.4
3. Site Environmental Setting	Section 3
3.1 General Introduction	Section 3
3.2 Regional Geology and Hydrogeology	Section 3.2 and Section 3.4
3.3 Site Geology and Hydrogeology	Section 3.2 and Section 3.4
3.4 Summary of Previous Site Sampling and Monitoring Data	Not Applicable
4. Summary and Conclusions	Section 6
4.1 Summary and Conclusions	Section 6
4.2 Recommended Way Forward	Separate Cover Letter
5. References	Throughout Text

Preliminary Site Assessment