

## Final Independent Closure Audit Report

Cappoquin Poultry,  
Lefanta,  
Cappoquin,  
Co. Waterford.

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P0834-02

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PP Environmental Consultants Ltd

Date: 13<sup>th</sup> February 2017

Revision: A

## 1.0 Introduction

On the 20<sup>th</sup> February 2014, PP Environmental Consultants submitted an Independent Closure Audit (ICA) proposal to the Agency.

This was subsequently approved by the Agency and on the 27<sup>th</sup> January 2017, Peter Pearson from PP Environmental Consultants Ltd and Anthea Southey (Inspector from the Agency) completed a site visit of the closed facility.

The purpose of the site visit by both parties was to complete the Independent Closure Audit requirements so that a final report could be submitted to the Agency to finalise the surrender of the IPPC Licence.

Previously, a comprehensive Site Closure – DMP Interim Validation Report was submitted to the Agency on the 24<sup>th</sup> February 2014 which identified the works undertaken shortly after site closure.

This report provides an update on the outstanding items that were included in the ICA proposal as well as a brief outline of the planned future use of the site.

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## 2.0 Site Closure - Outstanding Issues

The following items were identified to be completed during the ICA:

- a) *Prepare a final report following the completion of the site's approved Decommissioning Management Plan (DMP).*

This report.

- b) *Include final records of all waste removed offsite during the site closure process.*

Appendix 1 includes the waste disposal records for all waste materials recently removed offsite as part of the site closure – final clean-up process.

Hard copies of all waste records have been maintained on file.

A concrete floor from the previous chicken slaughtering building has been removed and is stored on-site. This concrete will be crushed at a future date and reused on-site for truck parking areas – see Photo in Appendix 4.

- c) *Prepare a list of materials and equipment to remain on-site (after licence surrender) for future use by any new potential owner (currently it is intended to leave refrigerant gases and asbestos roofing in-situ). A separate drawing showing the locations of these will also be prepared and submitted.*

Appendix 2 includes a drawing (Drg. No. 1507-I-SF-005) showing the locations of the main equipment items remaining on-site. During the site visit on the 27<sup>th</sup> Jan 2017, other equipment currently stored outside was identified to the Agency as being suitable for reuse in the proposed new pig slaughtering facility and that this equipment will be moved back indoors following the completion of the new slaughtering hall.

This equipment is not of environmental concern. Appendix 4 contains photos showing the equipment currently stored outdoors at the Cappelquin site.

- d) *Prepare a site drawing identifying areas requiring action prior to any future site activities recommencing on-site (i.e. repairs to bunds, pipelines etc). This drawing to be included in the ICA as well as being copied to Waterford County Council's Environment & Planning Departments.*

Appendix 3 contains a drawing (Drg. No. 1507-I-SF-004) which shows two items that need to be attended to before the new pig slaughtering facility commences operations on-site.

The first item is to line the oil tank bund with a sealant to ensure that it passes an integrity test.

The second item is to complete a small repair to a process drain at the proposed new pig slaughtering intake area. There are construction works in this area at the moment and it would be intended to repair this drain while the contractors are still on-site.

- e) *Documented verification that all plant and equipment remaining on-site (post licence surrender) is considered to be in a condition that is not causing or likely to cause environmental pollution.*

The purpose of the site visit with the EPA Inspector on the 27<sup>th</sup> January 2017 was to verify with the Inspector that all plant and equipment on-site is in a condition that is not causing or likely to cause environmental pollution. The Inspector agreed with PP Environmental Consultants that this is the case.

It was also verified during the site visit that the waste material previously stored in a shed on-site had been removed offsite. The waste records provided in Appendix 1 include this material.

- f) *It is currently not intended to undertake any further groundwater and surface water monitoring at the site following the recent completion of monitoring during the period Oct 2013 – Jan 2014. This is based on the results identified to date which show that the site's surface water discharge is within acceptable levels and that groundwater is being minimally impacted by offsite activities (IDA Septic Tank and Agricultural Activities).*

*However, this intention not to continue with on-site monitoring can be reviewed in the event that the EPA requests ongoing monitoring during the licence surrender process.*

It is our understanding that the Agency is satisfied with the previous rounds of monitoring completed at the site which show that the site is clean and not discharging anything of environmental concern.

- g) *A comprehensive hydrogeological report was completed for the site by IE Consulting and submitted to the EPA in January 2013. This was completed as part of the sites IPPC Licence conditions.*

*PP Environmental Consultants held a meeting with Jer Keohane of IE Consulting (Hydrogeologist) on the 11<sup>th</sup> October 2013 to discuss the site and a way forward whereby the intention was to apply for surrender of the licence. At this meeting it was agreed that IE Consulting would prepare a list of parameters for monitoring (groundwater and surface water) as well as the frequency over a 3 month monitoring period.*

*Based on a review of these results, IE Consulting would identify whether additional site investigation work would be required as part of the licence surrender process or if the site was in a satisfactory state that licence surrender could be applied for without the need for additional site investigation work.*

*IE Consulting's monitoring programme was completed between October 2013 and January 2014 and a copy of their report is included in Attachment No. 1 of the Interim Validation Report.*

*IE Consulting has concluded that "it is considered on the basis of the available groundwater and surface water sampling results, that past and present site activities is not contaminating groundwater beneath and surface water downstream of the site indicating that the site is suitable for licence surrender."*

*As a result of this conclusion, it is not considered necessary to undertake any further detailed site investigation work or risk assessments.*

*No further comment required.*

- h) The timescale for the completion and submission of the ICA Report is dependent on feedback from the EPA in relation to both the interim report and the proposed scope of work for the ICA. However, all parties are anxious to achieve licence surrender for the site in the shortest possible timeframe.

There has been a delay in completing the ICA report as a new owner (Sucrop Ltd) wasn't sure whether to keep the IPPC Licence in place or proceed with it's surrender. Once the 3 years were up in August 2016, the decision not to surrender was taken out of the new owners hands and hence the submission of this ICA report to the Agency.

- i) Site security currently remains in place on-site. Additional measures are being taken to ensure that access to the top of the various wastewater treatment plant storage tanks is removed while the site remains closed. These measures are being taken to comply with health and safety requirements.

As discussed with the EPA Inspector on the 27<sup>th</sup> January 2017, site security remains in place and there has been very little vandalism at the site.

### 3.0 Future Development

#### History since Site Closure

On the 16<sup>th</sup> August 2013, a Receiver was appointed to the site.

On the 23<sup>rd</sup> August 2013, David Boyd agreed to purchase the plant's contents and the site. The plant and equipment, not deemed fixed to the factory, was purchased by Boyd International Ltd (a UK Limited company). The property was purchased by a newly registered Irish Company (Boni Real Estate (Ireland) Ltd).

In late 2014, the site and remaining equipment was purchased by Sucrop Ltd, Kings Square, Mitchelstown, Co. Cork.

Sucrop Ltd is the current owner of the site and remaining equipment.

Sucrop Ltd has previously held meetings with both the Local Council and the EPA concerning the future use of the site and the issue about whether to maintain the existing IPPC Licence or to continue with the surrender application of this licence.

Once the 3 years were up following site closure (i.e. August 2016) Sucrop Ltd was informed that they needed to continue with the licence surrender application.

#### Future Use

As previously identified in this report, Sucrop Ltd intends to commence a pig slaughtering and deboning operation at the site.

Initially, the intention was to commence with a deboning and packing operation and to follow on with pig slaughtering at a later date. As a result, discussions were held with Irish Water to connect the deboning side of the operations to a foul sewer located at the site boundary.

On the 9<sup>th</sup> November 2016, Sucrop Ltd received a licence from Irish Water to discharge trade effluent to sewer – Licence No. IW-DTS-753808-01.

This discharge licence limits the daily discharge volume to 35 m<sup>3</sup>/day.

On the 4<sup>th</sup> February 2016, Sucrop Ltd received a Section 5 notice from Waterford City & County Council to change the use of the site from poultry processing to pork and bacon boning and includes for a 4" connection to the foul sewer.

Therefore, as it stands the site is now licensed to carry out a pork and bacon deboning operation and to discharge the effluent to the foul sewer under licence.

While the above regulatory matters were being approved, Sucrop Ltd made a decision to commence pig slaughtering at the facility sooner rather than later. As a result of this decision, work commenced in late 2016 on increasing the height of the slaughtering processing area to cater for pigs. A photo of the new building (currently under construction) is provided in Appendix 4.

Before any pig slaughtering can commence on-site, Sucrop Ltd intends to apply for planning permission for the change of use and this will include an Environmental Impact Assessment as required under the various Planning Regulations.

Work on the planning application and EIS is due to commence shortly once a project team has been finalised.

The initial pig slaughtering operation will be below the IE / IPPC Licensing thresholds, however there may come a point in time where these operations may expand and a licence application to the Agency will be required.

Sucrop Ltd is currently considering its options regarding the treatment of effluent from the pig slaughtering operation. There are two options being investigated:

- a) Discharge to sewer through a revised licence with Irish Water
- b) Start-up the existing WWTP on-site. If this option is pursued, an application will be made to the Local Authority for a discharge to waters licence.

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#### 4.0 Conclusion

Following an inspection by PP Environmental Consultants and the Agency on the 27<sup>th</sup> January 2017, it is concluded that the site is in a satisfactory state and is in a condition that is not causing or likely to cause environmental pollution.

Work has been completed on-site so that the existing IPPC Licence can be successfully surrendered.

The future use of the site will be licensed by the relevant authorities under the various Environmental and Planning Regulations.

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## Appendix 1

### 2017 Waste Records

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Waste Disposal Records

Year: 2017

Transfer Destination	EWIC Code	Hazardous	Quantity (tonnes)	Date	Disposal Cert	Description of Waste	Waste Treatment Operation	M/C/E	Method used Method Used	Location of Treatment	Name & Permit No.	Address
Within the country	19 12 02 & 19 12 03	No	38.44	16-20 Jan 2017		Insulated Cladding	R4	M	Weighed	Offsite in Ireland	United Metals, WFP/LK/2013/147A/R1	Eastway Business Park, Ballysimon, Co. Limerick
	20 03 07	No	1.88	16-20 Jan 2017		Plastic Piping	R12					
	20 01 38	No	2.04	16-20 Jan 2017		Timber	R12					
	17 04 07	No	35	16-20 Jan 2017		Scrap Metal	R4					
	20 03 07	No	13.94	16-20 Jan 2017		Ferrous Cement Sheeting	D15					
			<b>91.3</b>									
Within the country	17 06 05	Yes	6.06	20/01/2017		Asbestos Roof Sheeting	D15	M	Weighed	Offsite in Ireland	Rilta, W0192-03	Greenogue Business Park, Rathcoole, Co. Dublin
			<b>6.06</b>									

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## Appendix 2

### Drawing 1507-I-SF-005

### Equipment Remaining On-Site

(Uploaded separately onto EDEN)

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## **Appendix 3**

### **Drawing 1507-I-SF-004**

### **Repair Work Prior to Commencing Operations**

(Uploaded separately onto EDEN)

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## Appendix 4

### Site Photos

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Photo 1 – New Pig Slaughtering Building



Photo 2 – Concrete Floor from previous slaughtering building  
(concrete is to be crushed and reused on-site for truck laydown areas).





Photo 3 – Equipment remaining on-site to be reused in new Pig Slaughtering Facility



Photo 4 – Equipment Remaining on-site  
(Generator to be removed offsite once power is reconnected to site).  
(Oil tank bund (in the background) to be sealed prior to operations commencing on-site)