

## Diageo Great Northern Brewery

Carrick Road, Dundalk, Co. Louth

IE Licence Register No. P0440.01

### Updated Scope for Independent Closure Audit for Surrender of IE Licence

#### 1. Introduction

This document sets out the scope for the Independent Closure Audit at Diageo Great Northern Brewery, Carrick Road, Dundalk, Co. Louth, to be conducted as part of the surrender of IE Licence Register No. P0440-01.

Diageo has notified the EPA of the decision to close down brewing operations on the Great Northern Brewery site and to surrender the IPPC licence for the activity. Production on the site ceased in September 2013 and the site closed down at the end of December 2013. Diageo has completed contracts for the sale of the Great Northern Brewery site to a company that plans to convert the brewery into a distillery as soon as possible. The sale is agreed but is contingent on the successful surrender of the IE licence.

Diageo has prepared a Closure, Restoration and Aftercare Management Plan (CRAMP) for the site, which was submitted to the EPA with the application for surrender of the IPPC licence. An updated CRAMP, incorporating information on the new owner and the future use of the Great Northern Brewery site, and updated information on areas of environmental concern on the site, will be submitted to the Agency with this updated scope for the Closure Audit.

The *Application Form for Surrender of Licence*, published by the EPA in August 2011, requires that an Independent Closure Audit be carried out by a competent, adequately qualified and experienced person, and that the scope of the audit be agreed with the Agency. Diageo Great Northern Brewery has appointed independent consultants Byrne Ó Cléirigh Ltd. to carry out the Closure Audit and to manage the inputs from specialist hydrogeologists URS Ireland Ltd. into the soil and groundwater assessments for the audit report.

## 2. Scope of Audit

The scope of the Closure Audit will take into account the guidance contained in the checklist in Attachment 2 to the *Application Form for Surrender of Licence*. The following is the proposed scope of the audit.

### Decommissioning

- Review and assess the records relating to decommissioning of the facilities on the site in accordance with the details and checklist procedure set out in the CRAMP. The scope of the review will include removal/disposal of the following: production raw materials, non-production materials (e.g. consumables), production plant & equipment, and services plant & equipment.
- Assess the status of any service/utility that is to remain live on closure as part of any sales agreement with the new owner of the site, as provided for in the CRAMP.
- Review and assess the waste management records relating to all the waste streams generated on the site both during normal operations prior to closure and from the decommissioning activities.
- Review and assess the records relating to the emptying and cleaning of the plant and equipment, bunds, sumps and drains, and the disposal of the residues / wastes from these items / areas.
- Review and assess records relating to the inspection, removal and disposal of any asbestos containing materials, PCBs and refrigerants, and check the status of any such materials that may be remaining on the site.

### Soil & Groundwater Assessment

As part of the preparation and updating of the CRAMP, Diageo commissioned a Preliminary Site Assessment (PSA), Detailed Site Assessments (DSA) and Detailed Quantitative Risk Assessments (DQRA) for the Great Northern Brewery site. The PSA and DSA were undertaken in accordance with the EPA's draft 2012 framework document entitled "*Framework for Management of Contaminated Land and Groundwater at EPA Licensed Facilities*", while the DQRAs were undertaken in accordance with the EPA's 2013 guidance document entitled "*Guidance on the Management of Contaminated Land & Groundwater at EPA Licensed Sites*". Subsequently, at the request of the Agency, Diageo commissioned a Remedial Options Assessment and a Corrective Action Design & Implementation Plan to deal with soil/groundwater contamination on the site. The latter was prepared in accordance with the relevant sections of the Agency's template entitled "*Guideline Template for Corrective Action Feasibility & Design Report for the Environmental Protection Agency*".

The audit will review and assess the implementation of the recommendations from the site assessments, the DQRAs, the corrective action plans and the most recent groundwater monitoring results. It will assess the findings of verification monitoring and verification reports prepared on completion of corrective action plans.

### **Site Inspection**

A comprehensive inspection of the site will be carried out as part of the audit, with particular emphasis on any areas of previous or potential contamination, and the findings will be documented in the Closure Audit Report.

### **Licence Compliance**

A review of the non-compliances issued by the EPA for the facility over the past 5 years will be carried out to determine if any corrective actions are outstanding that may be material to the closure of the site.

### **Aftercare Management**

The audit will assess the suitability of the proposed Aftercare Management Plan in the CRAMP in light of the implementation of the CRAMP, the outcome of the DQRAs, the outcome of remediation works, the outcome of the inspection of the site, the results of the groundwater monitoring, and the future use of the site.

### **Verification of Criteria for Successful Closure**

The implementation of the CRAMP will be reviewed and assessed against the criteria for demonstrating successful closure of the site, which are set out in the CRAMP.

## **3. Timescale & Reporting**

It is planned to carry out the Independent Closure Audit in two stages. The first stage will cover all of the activities relating to the site which are above-ground, i.e. it will not cover ground and groundwater issues. An interim report will be issued on completion of the first stage of the audit. It is planned to conclude this stage of the audit and issue the interim report to the Agency before end of May 2014.

The objective of conducting the Closure Audit in two phases is to allow Diageo respond to any Requests for Information from the Agency at the earliest possible time and thus help to expedite the licence surrender process.

The second stage of the audit will cover soil and groundwater issues and, in particular, the close-out of the outstanding areas of environmental concern which Diageo are progressing with the Agency currently. A final report will be issued on completion of the second stage of the audit, which will update the interim audit report. It is hoped that this final report will be issued to the Agency before the end of June 2014.

The final report will contain a declaration on the condition of the site in respect of environmental pollution and environmental liabilities as required under the Agency's guidance for scoping the audit.

#### 4. Auditors

The Independent Closure Audit will be conducted by Byrne Ó Cléirigh Ltd. Byrne Ó Cléirigh is an independent firm of engineering and management consultants specialising in the Energy, Environmental and Risk Management areas since 1981. Byrne Ó Cléirigh has carried out numerous environmental audits and risk assessment projects, including due diligence, environmental impact assessment, site investigation and remediation, risk assessment including quantitative risk assessment, and licensing and permitting. Byrne Ó Cléirigh has particular expertise in the brewing sector. The company is wholly owned by the senior professional staff and has no commercial or financial links with any other body.

The audit team will be led by Ambrose Clarke B.E, C.Eng, FIEI, who is a Director of Byrne Ó Cléirigh and an experienced Environmental Auditor. He will manage the input into the audit from URS Ireland who have prepared the PSA, DSAs, DQRAs and Corrective Action Plans for the site. The URS team will be led by Sinéad Fitzpatrick B.A, M.Sc., who is a Principal Environmental Scientist with URS.

Diageo Great Northern Brewery  
Carrick Road, Dundalk, Co. Louth

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