

This memo has been cleared for submission to the Director by Senior Inspector, Patrick Byrne  
Signed: Sonya Smith Date: 27/10/2015



OFFICE OF THE DIRECTOR, LICENSING & RESOURCE USE

**ENVIRONMENTAL LICENSING PROGRAMME**

<b>TO:</b>	Director
<b>FROM:</b>	Úna O'Callaghan Environmental Licensing Programme
<b>DATE:</b>	27/10/2015
<b>RE:</b>	Technical Amendment to IPPC Licence Register Number: P0182-01 held by Glanbia (FP) Limited Roosky, Co. Roscommon.

The Agency received a request on 19<sup>th</sup> January 2015 from Glanbia (FP) Limited (hereafter Glanbia) to technically amend their Licence, Register No. P0182-01. The request is to accommodate the following:

- To revise the site boundary.

This memo recommends that the change may be accommodated by a Technical Amendment, in accordance with Section 96 (1) (c) of EPA Act 1992 as amended.

## 1. Background

Irish Country Meats Ruskey Ltd (now Glanbia (FP) Limited), were granted a licence (Reg. No. P0182-01) on the 17<sup>th</sup> November 1997, for the installation located at Roosky, Co. Roscommon. The installation is licenced under Class 7.4 of the First Schedule to the EPA Act 1992 as amended for the slaughter of pigs.

In May 2002, a major fire at the installation resulted in the cessation of pig slaughtering. With the agreement of OEE, canning and the operation of the wastewater treatment plant continued on-site until May 2007, when the site was purchased by a local development company, LEAD Partnership. However, the IPPC licence was not transferred from Glanbia to the new owner at the time. Glanbia have been working towards licence surrender over the last couple of years, and have carried out significant remediation works at the installation.

## 2. Technical Amendment request

On the 19<sup>th</sup> of January 2015, the Agency received a request for a Technical Amendment of IPPC licence P0182-01, in order to allow for a change in the licence boundary, to reduce the licensed area. The licence boundary currently covers an area of approximately 47 acres.

The licence was not transferred to the development company who purchased the site as it was deemed the licensee (Glanbia) was obliged to deal with the issues, contamination, related to the previous use of the site. Since then, the licensee has carried out an extensive assessment of the site, and remediation works have been carried out on a large area of land in order to restore the site. It is this area of land that the licensee is seeking to remove from the licence, representing approximately 40.7 acres of the current installation area. The

remaining portion of the site (approximately 6.3 acres) is to remain within the licence boundary, and will be further assessed and remediated as necessary by the licensee, Glanbia.

The licensee requests that the installation boundary authorised by IPPC licence P0182-01 is changed to the area shaded in red on the revised map (Drg No. IE572-006 Rev.D), submitted as part of this technical amendment request. The requested change requires the divestment of approximately 40.7 acre area of land from the licensed activity boundary.

### **3. Consultation with the Office of Environmental Enforcement (OEE)**

I have consulted with the OEE inspector, Kealan Reynolds, in relation to this technical amendment request. The OEE confirmed that the proposed site boundary alteration cannot be accommodated under the existing licence.

A memo from the OEE has been attached in Appendix 1. The memo confirms that the OEE has no objection to the request for a technical amendment and is satisfied that the area of land to be removed from the licensed installation 'are not causing or likely to cause environmental pollution'.

### **4. Assessment**

The licensee has supplied a significant amount of detailed information to the Office of Environmental Enforcement, detailing the works completed to date and provided monitoring data for surface water, groundwater and soils.

OEE have assessed the information submitted and concluded that *there is no significant impact from the licensed activity on the ground water aquifer and/or surface water*. They note however, that *activities have had an impact on soil and some shallow ground water however in all cases the source of contamination has been removed/reworked and any localised impacts have been mitigated against*.

*Though not 'pristine', the OEE consider the remediated parts of the installation to be typical of a brownfield type site. They conclude, based on the information provided and their assessment, that the areas proposed to be removed from the existing site boundary are not causing or likely to cause environmental pollution.*

The present owners of the land, LEAD Partnership, submitted a letter to the Agency objecting to the proposed reduction in the licensed boundary at the installation (see attachment C of OEE memo).

However, the area to be removed from the licensed boundary has been fully assessed and remediated as required. Since no further action or remediation work is required, I can see no reason to retain this area within the licensed boundary. The area to be retained within the licensed boundary has been identified as requiring further investigation and remediation, as it contains areas with hydrocarbons and asbestos.

### **5. Appropriate Assessment**

The installation is located within Roosky Town. The activity has ceased operation since 2007. Since then, significant works have been carried out to assess the site for environmental pollution, remove contaminants as necessary, or remediate on site. The

proposal for a technical amendment to change in the installation boundary does not involve a direct discharge from the installation to surface waters, ground waters, land or air.

There are no Special Protected Areas (SPAs) or Special Areas of Conservation (SACs) in the immediate vicinity of the installation. However, there are several Natura 2000 sites located in the vicinity (within 15km) of the installation. These are tabled below.

<b>Name</b>	<b>Site code</b>	<b>Distance(km)</b>	<b>Designation</b>
Clooneen Bog	002348	2.9	SAC
Lough Forbes Complex	001818	5.2	SAC
Ballykenny-Fisherstown Bog SPA	004101	5.2	SPA
Brown Bog	002346	11.8	SAC
Annaghmore Lough (Roscommon)	001626	14.1	SAC

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activity, individually or in combination with other plans or projects is likely to have a significant effect on a European Site(s). In this context, particular attention was paid to the European sites as referred to above and the Agency considered, for the reasons set out below, that the activity is not directly connected with or necessary to the management of those sites as European Sites and that it can be excluded on the basis of objective scientific information, that the activity, individually or in combination with other plans or projects, will have a significant effect on a European site, and accordingly the Agency determined that an Appropriate Assessment of the activity is not required.


This determination is based on the distance and lack of connectivity between the installation and the Natura 2000 sites referred to above.

## **6. Recommendation**

This memo recommends that the requested changes be accommodated by a Technical Amendment of Licence P0182-01 (held by Glanbia (FP) Limited), in accordance with Section 96(1) (c) of the EPA Act 1992 as amended.

I recommend that the licence amendment be approved as set out in the attached Recommended Technical Amendment. The making of the amendment will not result in the relevant requirements of Section 83(5) of the EPA Act 1992 as amended ceasing to be satisfied.

Signed,



Úna O'Callaghan  
Inspector  
Environmental Licensing Programme