

Site Visit Report

The site visit process is a sample on a particular day of an installation's compliance with some of its licence conditions. Where non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

Instructions and actions arising from the visit shall be addressed, or where applicable noted, by the licensee in order to ensure compliance, to improve the environmental performance of the installation and to provide clarification on certain issues.

The licensee shall take the actions specified to close out the non-compliances and observations raised in this Site Visit Report.

Licensee	
Name of Installation	Scarriff Civic Amenity Centre
Licensee	Clare County Council
Licence Register No.	W0150-01
CRO Number	
Site Address	Fossa Beg, Feakle Road, Scarriff, Clare
Site Visit Reference No.	SV02682

Report Detail	
Issue Date	05/10/2017
Prepared By	Caoimhin Nolan

Site Visit Detail					
Date Of Inspection	20/11/2015	Announced	No		
Time In	15:30	Time Out	16:30		
Agency Personnel On Site	Caoimhin Nolan				
Licensee Personnel and Role	Carmel Wall (Site caretaker/supervisor) David Leahy (Executive Engineer)				
Photo Taken	Yes	Samples Taken	No	Video Taken	No
Odour Assessment	No				

> Scope

To carry out a scheduled site inspection and assess compliance with the licence. This inspection also served to carry out an exit audit in relation to a licence surrender application relating to the facility.

> Media

The media inspected included land and water.

> Site Areas Inspected

- Site office
- Upper and lower yard areas, including the waste storage/handling areas
- Wooded copse area to the east of the facility (within licensed site boundary)
- Surfacewater discharge (SW1) and receiving water body (Cappaghabaun River)

> Documents Inspected

- Surfacewater visual inspection records
- Licence Surrender application
- Independent Closure Audit Report by SNC Environment (Received by EPA after site inspection, Feb 2016)



F.A.O: David Leahy

This Licence Audit Report details the Agency's findings following an exit audit at Scarriff Civic Amenity Centre on 20/11/15.

NOTIFICATION OF NON-COMPLIANCE

Clare County Council have been found to be in non-compliance with the conditions of the Waste Licence as set out in this Audit Report. You are required to undertake the corrective actions specified to close out the Non-Compliances and Observations raised in this Report or further enforcement action may be taken by the Agency. These actions may be verified during subsequent Inspections.

Please quote the above Site Visit Reference Number in any future correspondence in relation to this Report.

1. OPENING MEETING

Inspector Caoimhin Nolan gave a brief introduction to the objectives and scope of the audit and the procedure to be followed for the remainder of the audit. It was explained that this was an Exit Audit, which focuses on the condition of the site following cessation of the scheduled activity. The scope also addresses the enforcement documentation, the state of compliance with the licence and any outstanding issues. The audit was initiated in response to a request to surrender the waste licence made under licensee return LR018139 on 24/8/15. The waste licence (W0150-01), the documentation included in licensee return no. LR018139, and the licensee's Independent Closure Audit Report (received by EPA under licensee return no. LR021237) were used by the EPA in conducting the Exit Audit. The physical scope of this audit included the above-ground enclosed structures and yard areas within the licensed site boundary.

As well as applying for a surrender of waste licence W0150-1, it is noted that the licensee has concurrently applied to the EPA for a Certificate of Registration for the waste activities taking place at this civic amenity centre. The licensee had outlined in its licence surrender application document that the total quantity of waste accepted at the facility on an annual basis had been <1,000 tonnes per annum since 2012. The licensee had further pointed out that in accordance with the EPA's decision tree for Local Authority waste activities¹, a Certificate of Registration was the relevant authorisation applicable to the reception and temporary storage of waste (deposited by the public) for off-site recovery or disposal where the quantity of waste was <1,000 tonnes at any one time. The Inspector notes that the latter scenario came about from 31st March 2008 onwards, when the Waste Management (Facility Permit and Registration) Regulations 2007 (SI 821 of 2007) commenced.

¹<http://www.epa.ie/pubs/advice/process/New%20Licence%20Permit%20COR%20Tree%20-%20Local%20AuthorityV15.pdf>

2. ON-SITE ASSESMENT

2.1 Review of Documentation

The Inspector reviewed the total quantities of waste that had been accepted at the facility for each year between 2008 and 2016, as detailed in the licensee's AERs. These showed that the annual quantity of waste reported to have been accepted was less than 1,000t for each year between 2012 and 2016. The Inspector notes that the actual quantities that were reported in the AERs may not be fully accurate, as the quantity of waste reported in some years was exactly the same as that reported for other years (e.g. 2012/2013, and 2014/2015/2016). However, the Inspector was satisfied that the general trend of waste acceptance at the facility was one of <1,000 tonnes per annum since 2011. The Inspector notes that the maximum quantity of waste accepted in any one year between 2008 and 2016 was reported to be 1,457.11 tonnes (in 2008).

Given the above information, and having regard to the limited physical extent of the facility, the Inspector was satisfied that the scale and nature of the waste activities being carried out there could now be legitimately be authorised under a Certificate of Registration, as opposed to a waste licence. The Inspector therefore considered that the waste activities occurring at Scarriff Civic Amenity Centre at the time of the Exit Audit were not technically licensable.

2.2 Site Inspection and Assessment

An inspection of the site was conducted, and special attention was paid to waste handling and storage areas (including the Pierce refuse compactor and the Chemstore banded area), the upper and lower external yard areas, the wooded copse area to the east, and stormwater/surfacewater.

2.3 Interview

The following representatives were interviewed during the audit:

Name	Position	Issue
David Leahy	Executive Engineer	Licence compliance
Carmel Wall	Site Supervisor/Caretaker	Licence compliance, surfacewater inspections, septic tank

2.4 Documentation

The following documentation was requested for review:

Record	Condition No.	Comment
SW visual Inspection records	10.2	Satisfactory
Site drainage layout drawing		None available on-site

3. GENERAL COMMENT

This was an unannounced site inspection. The facility was generally found to be maintained in a satisfactory state, with waste being held in a tidy and nuisance-free manner. The licensee was noted

to have made some improvements to the perimeter security infrastructure to deter unauthorised access to the site. The staff interviewed at the time of the Exit Audit were unsure as to the status and location of any oil interceptor on-site, and subsequent correspondence submitted to the EPA indicates that no oil interceptor had been installed at the facility. Some kerbing was missing from the edge of the concrete yard surface and some run-off was noted to be seeping to ground to the south (near the stormwater discharge point, SW1), and to the east (on the edge of the wooded copse area). There was no stormwater discharge occurring from the facility at the time of the inspection. There was no visual evidence of pollution or contamination of the receiving water body as a result of the facility's activity. The Inspector was satisfied that the waste activity taking place at the facility was below the licensable threshold.

4. CLOSING MEETING

The closing meeting commenced at 4.15pm and the attendees were as at the opening meeting. Inspector Nolan gave a summary of the audit result. The licensee was found to be in non-compliance with the licence in the area listed below. The non-compliance and observations made during the audit (listed below) were discussed.

The licensee was briefed on the Agency's reporting procedures and was advised that an audit report would be issued.

Finally, the licensee was thanked for the courteous and co-operative manner of the staff, and the assistance and co-operation extended during the audit.

5. AUDIT FINDINGS

5.1 Audit Non-Compliances

The exit audit process is an overview of the apparent physical condition of the site following, part or total, cessation of the licensable activity. It also reports on a review of enforcement documentation and success against relevant conditions. The Agency did not undertake any specific sampling or analysis as part of this audit. The Audit endeavours, in so far as is practicable and reasonable, given the scope of the Audit as well as an understanding of the site, its operations and history, to identify and confirm satisfactory management of matters pertaining to enforcement and potentially polluting residuals. Nothing in this Report shall be construed as relieving the current owner or any future purchaser of the site from its/their present or future liabilities in relation to environmental or human health matters connected with this site whether arising from or connected with Waste licence W0150-01 or otherwise.

The licensee was found to be in non-compliance with the requirements of the licence in respect of the following on the day of the audit (Schedule and Condition numbers refer to the licence):

1. Oil Separator

No silt trap and oil separator had been installed at the facility, and surfacewater from hardstanding areas (being used for the storage of waste) was being allowed to discharge directly to ground without passing through an oil interceptor.

This is in non-compliance with **CONDITION 3.10.1**

Condition 3.10.1 states: *The licensee shall install and maintain a silt trap and an oil*

interceptor at a location to be agreed with the Agency to ensure that all surface water from hardstanding areas where waste is stored passes through a silt trap and oil separator prior to discharge from the facility.

Corrective Action Required

The licensee is required to install this infrastructure at the facility in accordance with Condition 3.10.1. The licensee is reminded of the need to agree the specification and details of this infrastructure with the Agency in advance of installation as per Condition 3.2.1. In this regard, the licensee should submit a fresh SEW proposal to the Agency, or install the infrastructure in accordance with the original SEW which was agreed by the Agency in 2007 (see correspondence ref. W0150-01/GEN13DD, issued on 9/1/07).

5.2 Audit Observations

While observations do not constitute non-compliances with any condition of the licence, they should be addressed or where relevant noted by the licensee in order to ensure compliance, improve environmental performance of the installation and provide clarification on certain issues, as required.

1. Yard run-off

Stormwater run-off arising from the lower yard area was noted to be seeping into the ground to the east and south of the concrete pad. The lower yard area was being used for the outdoor storage of waste at the time of the inspection – e.g. white goods, timber, WEEE. The Inspector noted the presence of some oil and a white-coloured slime deposit on the concrete yard surface near where the run-off was being allowed to discharge to ground. The discharge to ground was facilitated by the absence/removal of kerbing around the concrete pad in two locations, which the Inspector considered may have been done intentionally to relieve the build-up of stormwater in the yard. It was noted for example, that no stormwater drains were visible in the lower yard, and no oil separator had been installed at the facility.

Corrective Action Required

Reinstate the kerbing around the concrete pad associated with the lower yard so as to direct all run-off to a silt trap/oil separator and then to discharge point SW1. [Note: the licensee was requested at the audit closing meeting to submit a site drainage map/drawing, and one was subsequently included in the ICA report that was submitted to the Agency.]

2. Soil Investigations

In relation to observation no. 1 above, the Inspector notes that soil sampling was done as part of the Independent Closure Audit in the vicinity of the two overspill points from the concrete pad of the lower yard area. While the presence of some extractible petroleum hydrocarbons was present in the upper layer of soil, the sampling did not identify any significant impact on soil quality.

Corrective Action Required

Complete the reinstatement of the kerbing around the concrete pad and install an oil

separator to prevent any impact on soil quality.

3. **Surfacewater Quality**

The licensee's surfacewater visual inspection records were reviewed on-site and were considered to be satisfactory. The Inspector also carried out visual observations at the surfacewater discharge point (SW1) and the receiving waterbody, both upstream and downstream of the facility, and no issues or evidence of pollution/contamination was noted. The Inspector notes that surfacewater sampling/analysis was done as part of the Independent Closure Audit, and the results provided in the ICA report were considered to be satisfactory. [Note: One set of lab results in the ICA report was noted to highlight the presence of very high levels of Ammoniacal Nitrogen in a number of groundwater wells, however these results related to Doora Landfill and not Scarriff Civic Amenity Centre.]

Corrective Action Required

None.

4. **Septic Tank**

The licensee's representatives interviewed during the audit were not aware of any desludging or maintenance having previously been done on the septic tank located at the facility, and no records were available to demonstrate such. The Inspector notes the subsequent information provided in the Independent Closure Audit report in relation to the performance of the septic tank (as demonstrated by sampling and analysis of the discharge from the septic tank) and is satisfied that no further corrective actions are necessary at this time.

Photographs (taken by Inspector Nolan during Exit Audit on 20/11/15)



Photo 1: general view of upper yard area.



Photo 2: general view of lower yard area.



Photo 3: general view east from the lower yard area, with wooded copse area in the background. A foul sewer manhole is visible, with the septic tank located behind (beside white goods). Note the absence of kerbing at the edge of the concrete pad beside the white goods.



Photo 4: close-up of eastern edge of concrete pad (lower yard) where kerbing was absent and a white-coloured slime deposit was evident on the concrete surface.



Photo 5: outdoor WEEE storage on the lower yard.



Photo 6: general view of the southern edge of the lower yard (facing south). Note the absence of kerbing at the edge of the concrete pad beside the WEEE receptacles, and the seepage of run-off moving towards the unpaved area.



Photo 7: general view of the stormwater discharge point SW1 (facing south) and the receiving waterbody.

This was an unannounced scheduled site inspection to assess compliance with the licence and to complete an exit audit, following receipt of a licence surrender application. The facility is of a small scale, and was generally found on the day of the site inspection to be run in a satisfactory manner. No oil interceptor had been provided at the facility to handle stormwater run-off, and some run-off was observed to have percolated to soil areas at the edge of the concrete apron. The surfacewater discharge from the facility was free from any visual signs of contamination. Subsequent to the date of the site inspection, an independent closure audit report (prepared on behalf of the licensee) was submitted to the Agency, and this clarified matters relating to potential soil impact etc. highlighted during the EPA's site visit. Based on the findings of the site inspection, and other documentation submitted in support of the licence surrender application, the Inspector was satisfied that the waste activity was no longer licensable, and that there were no long-term environmental liabilities associated with the operation of the facility.

FOLLOW-UP ACTIONS

You are required to complete the instructions and actions, as outlined in this report, within the specified timeframe. Where required, you shall respond to actions specified in Compliance Investigations within the required timeframe. The licensee shall maintain documentary evidence, for review by the EPA, that the prescribed corrective actions were completed within the required timeframe.

(i) Compliance Investigations

You are not required to respond directly to items contained in this EPA site visit report; where an issue requires a direct response, the EPA will generate a Compliance Investigation through the EDEN system. You will receive notification when a Compliance Investigation instruction or action is generated.

(ii) Publication of reports and licensee response.

Please note that this Site Visit Report will be made available for public viewing via the EPA's Licence Enforcement Access Portal within one day of the issue date and will be published on the Licence Details Page of the EPA's website, www.epa.ie, that relates to your licence 60 calendar days after the issue date.

You may if you choose submit, within 45 calendar days of the issue date of this Site Visit Report, a Licensee Public Response that will be published alongside the Site Visit Report. This Response, should you wish to avail of it, provides you with an opportunity to inform the public about how you are implementing the actions set out in the report, activities underway, timescales and target completion dates. Please be aware that the content of your Licensee Public Response must be factual and should not breach the EPA's stated online publication standards.

If you wish to submit a Licensee Public Response to an EPA Site Visit Report, you should do this by clicking on the 'Make a Response' link on the Site Visits page in EDEN. A .pdf document containing your response can be attached and submitted from here.

(iii) Response to Site visit report

Where you do wish to respond directly to a site visit report, you should do this by generating a 'Licensee Return' of the type 'Site Updates/Notifications' and the sub-type 'Response to EPA Report' in EDEN.

Please note that you are required to comply with the conditions of your licence at all times, and where noncompliance occurs you must restore compliance within the shortest possible time. These actions will be verified during subsequent EPA visits.

Please quote the above Inspection Reference Number in any future correspondence in relation to this Report.