



**IE CONSULTING
WATER-ENVIRONMENTAL-CIVIL**

Our Ref: EF/IE572/1207

Your Ref:

Date: Monday, 19 January 2015

INNOVATION CENTRE
GREEN ROAD
CARLOW

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Kealan Reynolds,
EPA Inspector,
Office of Environmental Enforcement,
EPA Regional Inspectorate,
John Moore Road,
Castlebar,
Co. Mayo.

Re: Exit Audit Approval - Technical Amendment Request to IPPC Licence P0182-01

Dear Kealan,

On behalf of Glanbia Plc, IE Consulting are submitting a technical amendment to IPPC Licence P0182-01 to release portion of lands from their IPPC licenced site located in Roosky, Co. Roscommon.

The purpose of the technical amendment is to release land that has been remediated by the licensee. The areas of the proposed technical amendment have demonstrated by risk assessment;

1. No risk to bedrock groundwater beneath the site,
2. No risk to surface waters located adjacent to the site.

Remediation of certain areas of the proposed technical amendment has been completed; potential pollutants have been removed from the site and disposed of or removed to within the area of the proposed new IPPC licence boundary. The technical amendment to the license boundary should not alter or increase the environmental impact of the installation. The supporting risk assessment and remediation report has demonstrated that the remedial works have improved the quality of certain areas of soil and reduced the potential risk to the bedrock groundwater and the adjacent surface waters.

IE Consulting have attached the supporting risk assessment and remediation report of the areas outlined within. The report clearly outlines the proposed boundary amendment to the existing IPPC licence boundary.

Glanbia Plc would appreciate if you could undertake an Exit Audit of the proposed area covered by the Technical Amendment and submit exit audit approval for the licensee to submit with the Technical Amendment. We have attached a map of the proposed boundary amendment.

Please don't hesitate to contact me if you require any further information/clarification.

Yours Sincerely,

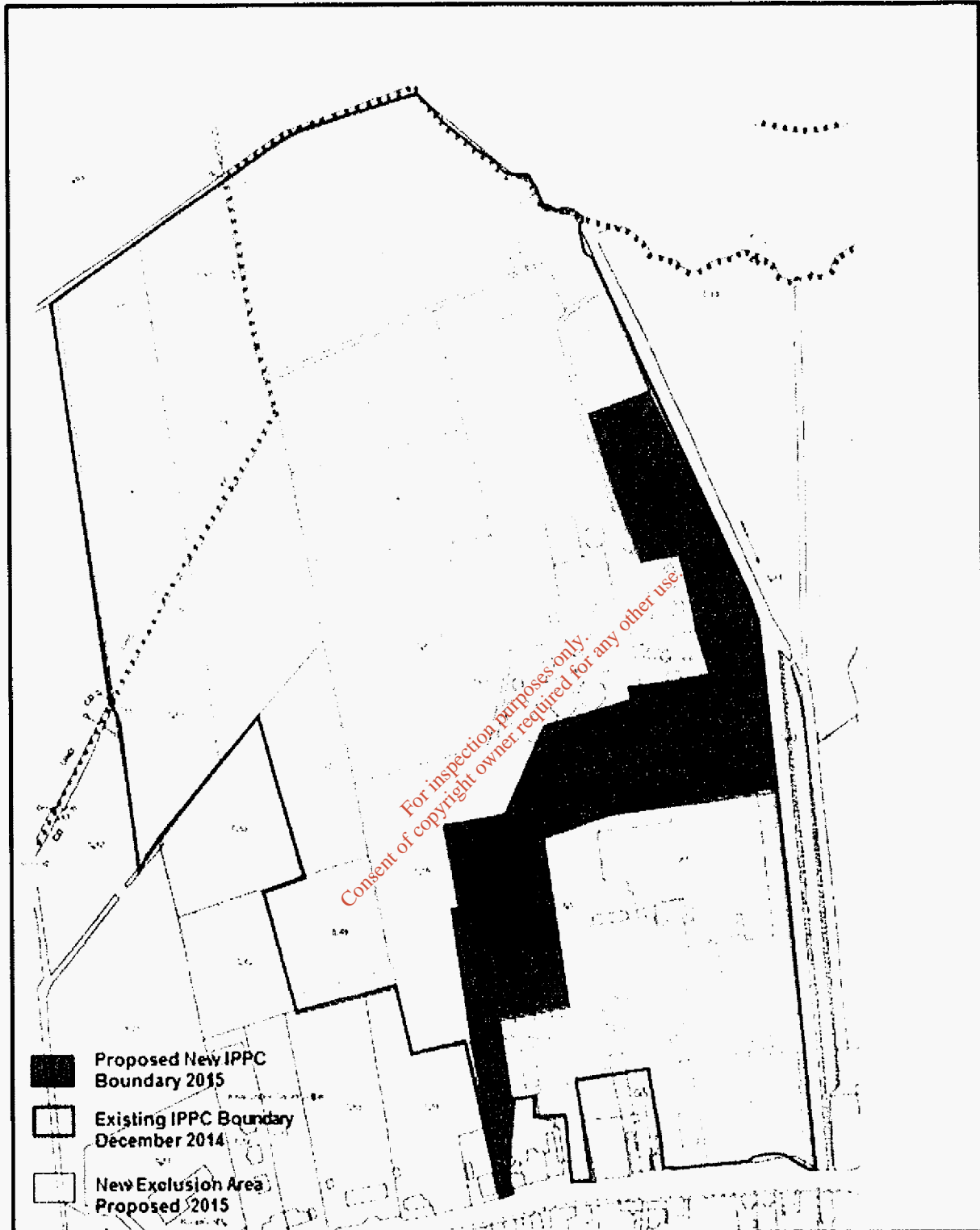
Eoin Fitzpatrick




MSc. Contaminated Land & Remediation


JRP Integrated Engineering Ltd
Registered Office: Innovation Centre, Green Road, Carlow
Company Registration No. 519448

Directors: RR Matthews BSc CEng FICE P McShane BEng(Hons) MIEI J Keohane BSc MSc Cgeol FCIWEM MIEI
Associates: O O'Connell BA(Env. Sci) MSc(Hydrogeology) A Whelan BSc(Hons) PG Dip (Hydrogeology)
An Associate Company of VA Consulting Engineers & Geotechnical & Environmental Services Ltd





-  Proposed New IPPC Boundary 2015
-  Existing IPPC Boundary December 2014
-  New Exclusion Area Proposed 2015

IE Consulting Innovation Centre, Green Rd., Carlow Ph: 059 9133084 Fax: 059-9140459 E-mail: info@iecc.ie	 IE CONSULTING WATER-ENVIRONMENTAL-CIVIL	Project Title: IPPC Licence Termination					
		Project Address: Roosky, Co. Roscommon					
		Client: Glanbia					
		Drq. Title: Proposed Reduction in IPPC Boundary					
		Drq. Scale: NTS					
		Date: 18/12/2014	Dwg No.: IE572-008	Revision: F	Job No.: IE572	Dwg. By: EF	



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LEAD Partnership
Cloonfour,
Rooskey,
Carrick-on-Shannon,
Co. Roscommon.

Our Ref: AC/LEAD/013

Your Ref:

Date: Thursday, 19 March 2015.

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EPA Inspector,
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Re: Exit Audit Approval – Technical Amendment Request to IPPC Licence P0182-01

Dear Kealan,

I refer to the CD with regards to the above, which I received with thanks on the 11th March 2015.

On behalf of LEAD Partnership I wish to raise concerns over the validation of their request and indeed their proposed new IPPC Boundary, please find attached map for you convenience (drawing number: E572-008 Revision F).

As the site owner's we feel that until the totality of the site has been investigated / remediated we LEAD Partnership object to Glanbia Plc or its agents to be allowed reduce the Boundary of the current IPPC Licence P0182-01.

For the record we reiterate that Glanbia Personnel are permitted to enter the site for the purpose investigations / remediation works.

We await your comments and if you need any clarification please don't hesitate to contact me.

Yours Sincerely,

Adrian Cox
On Behalf of LEAD Partnership



Memorandum

DATE:	2 nd April 2015
TO:	Patrick Byrne, Licensing
FROM:	Kealan Reynolds
SUBJECT:	Application for revised licensed site boundary for Glanbia Fresh Pork, Rooskey, P0182-01

Background:

Glanbia Plc are the current licensee for the facility at Rooskey, Co. Roscommon. The site was active as a pig slaughtering and processing plant since the 1930's and it developed through the years with significant redevelopments and expansions occurring during the period 1988-2002. The facility was licensed by the Agency in November 1997. The area covered by the IPC Licence is c. 37 acres. An aerial view of the facility including the facility boundary is included as Attachment A.

The operations at the facility including slaughtering, processing, meat canning, curing, etc. The site included a wastewater treatment plant which treated effluent generated on-site prior to discharge to the nearby River Shannon. There was a significant fire at the facility in 2002 which destroyed the slaughtering plant, curing hall and associated old stores. Following the fire slaughtering operations were relocated to other Glanbia Plants whilst the on-site meat canning operations continued to operate until September 2007 when the site was closed and all operations ceased.

The site was purchased by a local development company, LEAD Partnership in 2007. The LEAD Partnership group had ambitious plans to develop housing and commercial units at the facility, however these development plans never came to pass. The IPC Licence was never transferred from Glanbia to the current site owner. Glanbia have been working on a licence surrender over recent years and have carried out a significant amount of works at the facility in order to assess site conditions and remediate areas where required.

It is apparent that the working relationship between Glanbia (licensee) and LEAD Partnership (site owner) have been strained in recent years.

Glanbia have now reached a point where a significant portion of the facility has been assessed and remediated where necessary. There are however some parts of the facility where there are issues that remain to be addressed, such as hydrocarbon contamination of soil, and waste stockpile (primarily C&D type material) contaminated with asbestos. Glanbia are continuing to work on a remediation plan for the contaminated areas however they are requesting that the existing licensed area as defined in the current IPC Licence is amended to exclude any areas that have been assessed and deemed to be in a condition that will not give rise to environmental pollution. They propose that areas where there

contamination has been identified will be maintained within the revised licence boundary. The map showing the proposed revised facility boundary is included as Attachment B.

It should also be noted that the LEAD Partnership submitted a letter to the OEE in recent weeks objecting to the proposed reduction in the licensed boundary at the facility. A copy of this letter is included as Attachment C.

OEE Comment:

The licensee submitted a significant volume of data and reports as part of the application to amend the current licence boundary. The information submitted provide details of the works completed to date and provides monitoring data for surface water, groundwater and soils at and around the facility.

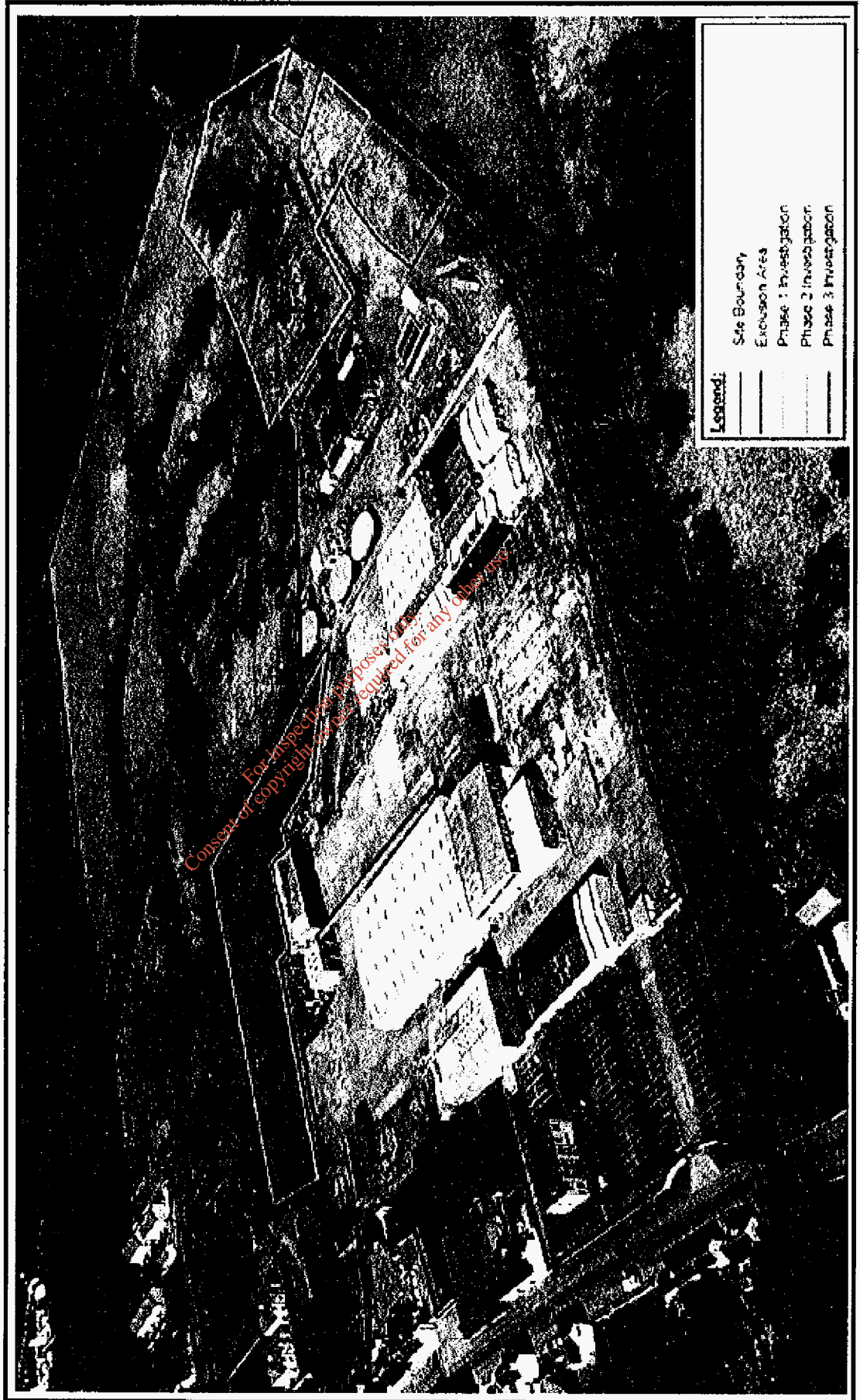
The investigative and remediation works have been completed on a phased basis, there were a number of areas identified during the works where remediation was deemed necessary. Remediation involved the identification and delineation of areas of the facility where contamination of the soil, surface water or groundwater was being contaminated from an identified source. In most cases the identified source of the contamination was removed from the facility to an appropriate outlet. Some of the areas where remediation is required will remain within the proposed amended facility boundary.

Based on the information submitted and reviewed it is considered that there is no significant impact from the licensed activities on the groundwater aquifer and/or surface water. The activities have had an impact on soil and some shallow groundwater however in all cases the source of contamination has been removed/reworked and any localised impacts have been mitigated against.

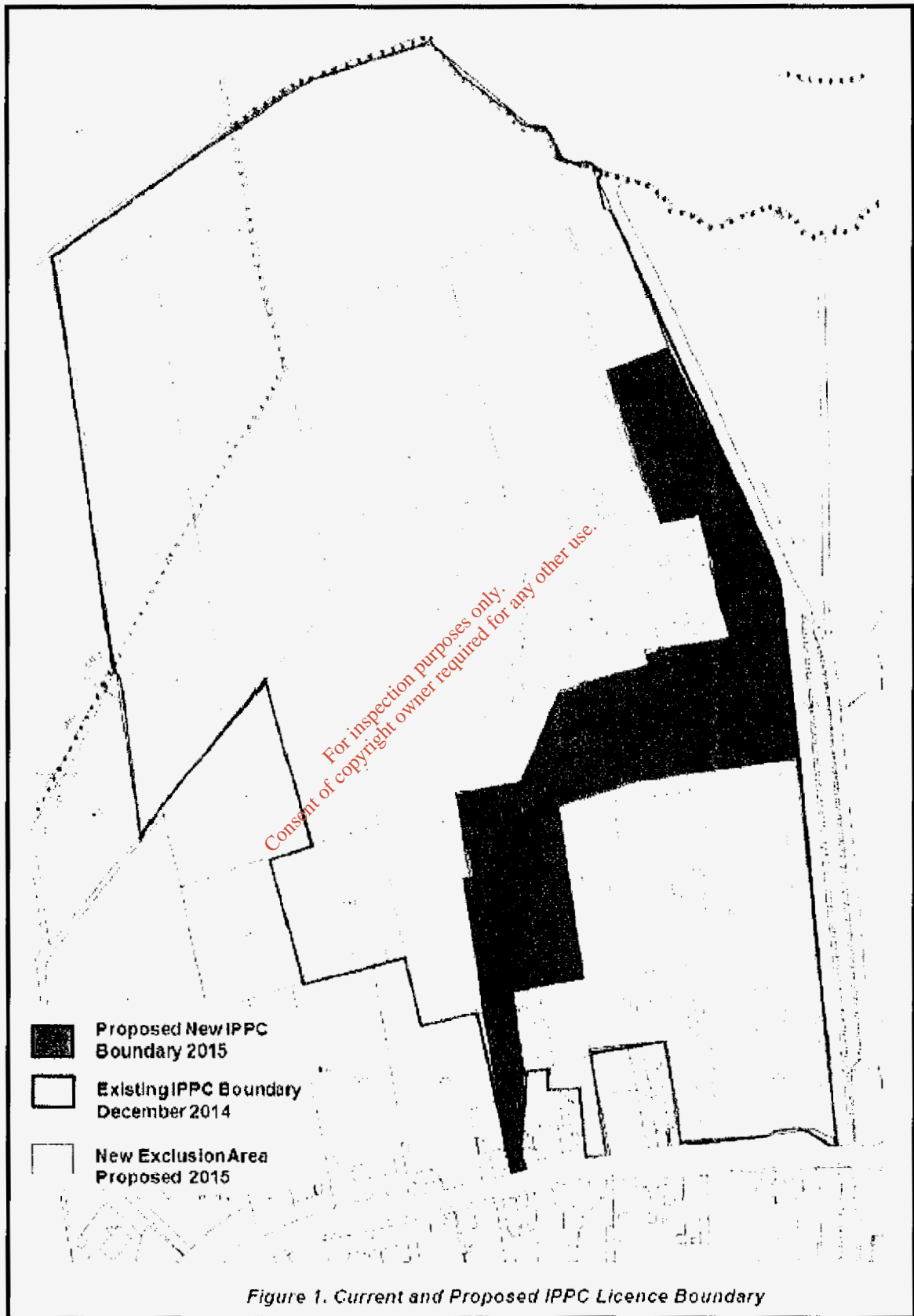
The OEE have reviewed the information submitted and consider that the remediated parts of the facility are by no means "pristine", however they are typical of a brownfield type site and based on the information it is considered that the areas proposed to be excluded from the existing facility boundary are not causing or likely to cause environmental pollution. It is considered that the investigative aspects of the works were carried out to appropriate detail and were appropriately supervised.

The volume of information submitted to the OEE with regard to the remediation works to-date was significant, an electronic copy of the information submitted will be forwarded to the Licensing Section for their information.

Attachment A - Aerial view of the facility including the facility boundary



Attachment B - Map showing the proposed revised facility boundary



Attachment C - Letter received by the OEE from LEAD Partnership objecting to the proposed reduction in the licensed boundary at the facility

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