

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	Glanbia Ireland Designated Activity Company
Licensee	Glanbia Ireland Designated Activity Company
Licence Register No.	P0963-01
CRO Number	501098
Site Address	IDA Science and Technology Park, Gorteens, Belview, Port Road, Kilkenny, X91 YC9R
Site Visit Reference No.	SV17161

Report Detail	
Issue Date	02/12/2019
Prepared By	Aisling Whelan

Site Visit Detail					
Date Of Inspection	25/10/2019	Announced	No		
Time In	09:50	Time Out	15:50		
Agency Personnel On Site	Aisling Whelan Brendan Kissane				
Licensee Personnel and Role	Andrea Galvin (Environmental Health & Safety Manager)				
Photo Taken	Yes	Samples Taken	No	Video Taken	No
Odour Assessment	No				

> Scope

This site visit was conducted as part of the EPA's routine annual site visit programme to evaluate the licensee's compliance with the requirements of its Industrial Emissions (IE) Licence Reg. No. P0963-01.

> Media

The following media was relevant to the site visit:

- Air
- Wastewater
- Stormwater

> Site Areas Inspected

The following areas of the site was inspected:

- Wastewater treatment plant
- Dryer air emission points on roof
- Existing and new boilers
- General external yard areas
- Stormwater monitoring locations (SW1 & SW2)
- Gorteens stream to the south of the site (where accessible)
- Indoor production/process areas

> Documents Inspected

The following documents were inspected:

- Final effluent (SE2) monitoring results for 2019 to date
- Site drainage (storm, foul, process) drawing
- Daily visual stormwater inspection log (May 2019 to date)
- Noise monitoring report 9/10 August 2019
- Odour Management Plan (last reviewed October 2017)
- Monthly odour assessment field sheets for 2019 to date
- Air emissions monitoring reports???



1. Effluent Emission

	Answer	Condition Number	Non Compliance	Observation	
1.1	Are Licensee effluent quality test results compliant with ELV limits within last 12 months?	No	4.3.1 & 5.1	Yes	
Comment / Corrective Action					
The pH of the final effluent was 5.2 on 04/06/2019 and 05/06/2019 which was below the licensed ELVs of 6 -10 pH units.					

	Answer	Condition Number	Non Compliance	Observation	
1.2	Where non-compliant exceedances occurred, were they notified as incidents as per Agency guidance and the licence conditions? If no, provide details relating to the exceedances.	Yes	9.3.1(vi) & 11.1		
Comment / Corrective Action					
The pH breach referred to above was reported to the EPA as in incident on 07/06/2019 (Incident No. INCI016590).					

	Answer	Condition Number	Non Compliance	Observation	
1.3	If there were non-compliant effluent results in relation to the facility in the previous 12 months has the licensee identified the likely causes?	Yes	9.3.1		
Comment / Corrective Action					
The licensee identified that the breach was related to work being undertaken with different coagulants to optimise COD and OFG removal at the on-site wastewater treatment plant (WWTP). That in conjunction with CIP processes which were occurring at the time resulted in the breach.					

	Answer	Condition Number	Non Compliance	Observation	
1.4	Did the licensee take corrective/preventive action to resolve any likely causes of non-compliant effluent emissions?	Yes	2.2.2.10		
Comment / Corrective Action					
The pH profile of the plant was raised and the plant was reset to divert out of specification effluent to the inlet sump.					

	Answer	Condition Number	Non Compliance	Observation
1.5	Has capacity, operation of the WWTP been reviewed by the licensee within the past 24 months?	Yes		
Comment / Corrective Action				
The plant was reviewed and upgraded during 2018/2019 as part of expansion of production at the site and review of its IE Licence.				

	Answer	Condition Number	Non Compliance	Observation
1.6	Is the licensee in-house monitoring of WWTP and storm water emissions conducted in accordance with a documented Analytical Quality Control programme which includes appropriate control standards and action protocols?	Not Applicable	6.2.3	
Comment / Corrective Action				
The EHS manager indicated that no in-house monitoring is undertaken. All sample analysis is carried out by an external lab. The continuous monitors for temperature, pH and TOC are calibrated quarterly by an external contractor.				



2. Storm Water

2.1

	Answer	Condition Number	Non Compliance	Observation
Are there up-to-date site drainage drawings of appropriate scale available to show clear separation of clean surface water, contaminated surface water and process effluent lines?	Yes	11.7(vi)		Yes

Comment / Corrective Action

Up to date drawings were available. However, it was noted that it was not possible to clearly discern direction of flow (particularly for stormwater) in some areas of the site. It was also not clear during the site visit where run-off from the truck refuelling area in the southwestern area of the site is diverted to.

Corrective Action Required:

- The license shall confirm where all run-off from the truck refuelling area is diverted to. This shall be submitted via EDEN as a licensee return and shall include drainage drawings for the truck refuelling area clearly showing (with arrows) where run-off from this area is diverted to.
- The licensee shall arrange to have site drainage drawings updated to clearly indicate direction of flow in all drains. This shall be completed within three months of the date of this report and be available for inspection by EPA staff at any reasonable time.

2.2

	Answer	Condition Number	Non Compliance	Observation
Is there an indication that contamination of storm water has occurred?	No	5.1, 6.14.1 & 6.14.2		

Comment / Corrective Action

Records of visual inspection of stormwater discharges (SW1 and SW2) from May 2019 to date were inspected and no evidence of contamination was recorded. It was noted that as part of Licence Condition 6.14.2 the licensee was required to review trigger levels for pH, TOC and temperature in the stormwater discharge at SW2 within six months of the date of the grant of the licence (i.e. by 07/09/2019). (A report on this review was subsequently submitted to the EPA on 21/11/19).



3. Nuisance Management

3.1

	Answer	Condition Number	Non Compliance	Observation
Has the licensee carried out nuisance (odour, noise, dust, etc.) monitoring this year? (If yes, was the monitoring compliant according to the licensee?)	Yes	6.2 & 6.15		Yes
Comment / Corrective Action				
<p>The licensee is required to carry out a noise survey annually. The most recent noise survey was undertaken on 9th and 10th August 2019 and all results were within emission limits values (ELVs) specified in the licence.</p> <p>Odour assessments were carried out monthly during 2019 (see Question 3.2 below).</p> <p>As part of the revised licence P0963-02 (issued on 7/3/2019) the licensee is required to undertake dust deposition monitoring biannually at locations to be agreed with the EPA. EPA inspectors noted during the site visit that no submission had been received to date with regards proposed locations. (Subsequent to the site visit the licensee submitted proposed dust monitoring locations to the EPA on 18/11/2019, see Licensee Return LR045176).</p> <p>Corrective Action:</p> <p>Once monitoring locations have been agreed the licensee shall commence biannual dust monitoring as required by License Condition 6.2 and Schedule C.6.1.</p>				

3.2

	Answer	Condition Number	Non Compliance	Observation
Has the licensee carried out any odour assessments this year?	Yes			Yes
Comment / Corrective Action				
<p>The licensee carries out in-house monthly odour assessments at nine locations surrounding the site which were identified in the sites Odour Management Plan (OMP). Monthly field record sheets for 2019 to date were inspected. It was noted that the odour assessments were not undertaken in accordance with the <i>Air Guidance Note 5 (AG5) - Odour Impact Assessment Guidance for EPA Licensed Sites (EPA, 2019)</i>. For example, it was recorded that wind direction was not detected during all assessments in 2019.</p> <p>Corrective Action</p> <p>Monthly odour assessments shall be undertaken in accordance with the above-referenced guidance note. As indicated in Section 3.4 of this document the sequence of assessment locations is based on wind direction. Selecting suitable locations (and the sequence) is more difficult when wind direction is not detectable. In these instances, it is preferable to postpone an assessment (unless the purpose of the assessment is to investigate a specific complaint or similar).</p>				

3.3

	Answer	Condition Number	Non Compliance	Observation
Where nuisance (odour, noise, dust, etc) monitoring was non-compliant was this reported to the Agency as an incident?	Not Applicable	9.3.1(vi) & 11.1		

	Answer	Condition Number	Non Compliance	Observation
3.4	Has the installation been free of nuisance (i.e. odour, noise, dust etc.) complaints in the last 12 months?	No	11.5	
Comment / Corrective Action				
A complaint of noise nuisance was received by the licensee on 27/01/2019 but no further details were available.				

	Answer	Condition Number	Non Compliance	Observation
3.5	If there were nuisance (odour, noise, dust, etc.) complaints in relation to the facility in past 12 months, has the licensee identified the likely causes?	Checked		
Comment / Corrective Action				
No detailed information on the noise complaint from 27/01/2019 was available during the site visit.				
<u>Corrective Action Required:</u>				
The licensee shall submit details of the noise complaint received on 27/01/2019 including details of likely causes and corrective actions taken. This shall be uploaded via EDEN as a licensee return by 09/12/2019.				

	Answer	Condition Number	Non Compliance	Observation
3.6	Did the licensee take corrective/preventive action to resolve any nuisance (odour, noise, dust etc.) issues?	Not Checked		

	Answer	Condition Number	Non Compliance	Observation
3.7	Where odour management plan is required, is the licensee implementing the plan?	Checked	5.6	

	Answer	Condition Number	Non Compliance	Observation
3.8	Does the licensee have a noise reduction plan in place?	Not Checked	5.7	



4. Containment

	Answer	Condition Number	Non Compliance	Observation
4.1	Are bunds, tanks, pipelines & containment structures integrity assessed as required by the licence?	Not Checked	6.10	Yes
Comment / Corrective Action				
<p>Licence Condition 6.10 required the licensee to integrity test all tanks, bunds, containers and underground pipelines within six months of the date the revised licence P0963-02 (i.e. by 07/09/2019). The EHS manager indicated the testing was undertaken during September but reports were not available for inspection as they had not been issued by the contractor yet. (Subsequent to the site visit the licensee submitted samples of integrity test reports completed, see Licensee Return LR045213).</p> <p>Corrective Action:</p> <p>The licensee shall ensure to maintain copies/records of integrity tests on site for inspection by EPA staff in accordance with Licence Condition 6.10.</p>				

	Answer	Condition Number	Non Compliance	Observation
4.2	Is there a corresponding integrity test report that documents repairs of defects to bunds, tanks, pipelines & containment structures?	Not Checked	6.10	



5. Air Emissions

	Answer	Condition Number	Non Compliance	Observation
5.1	Are licensee air emission test results (boiler, drier etc. as specified in the licence) compliant with ELV limits within last 12 months?	Checked	5.1	
Comment / Corrective Action				
<p>The licensee is required to monitor air emissions at twelve locations.</p> <p>The most recent monitoring results from June 2019 for the dryer exhausts (A2-3, A2-4 and A2-6) were submitted to the EPA as part of the abatement test programme required under Licence Condition 6.1.1. All results were compliant with ELVs.</p> <p>Monitoring results from July 2018 for the boilers (A1-1, A1-2, A1-3) were checked and all results were complaint with licence ELVs. The EHS manager indicated that annually testing of these boilers had not been undertaken for 2019 yet but that the new boilers (A1-4) will be included in the 2019 round of monitoring.</p>				

	Answer	Condition Number	Non Compliance	Observation
5.2	Where non-compliant exceedances occurred, were they notified as incidents as per Agency guidance and the licence conditions? If no, provide details relating to the exceedances.	Not Applicable	9.3.1(vi) & 11.1	

	Answer	Condition Number	Non Compliance	Observation
5.3	Did the licensee take corrective/preventive action to resolve any likely causes of non-compliant air emissions?	Not Applicable	2.2.2.10	

	Answer	Condition Number	Non Compliance	Observation
5.4	If there were non-compliant air emission monitoring results in relation to the facility in the previous six months has the licensee identified the likely causes?	Not Applicable	9.3.1(i)	

	Answer	Condition Number	Non Compliance	Observation
5.5	Has capacity, operation of the air abatement equipment or boiler been reviewed by the licensee within the past 24 months?	Yes		
Comment / Corrective Action				

A review of the air abatement and boilers was undertaken as part of the revised licence application for P0963-02. Additionally, Condition 6.1.1 of the new licence required a test programme for air abatement equipment to be undertaken. A satisfactory report on same for air emissions from the bag filters on the dryers (A2-3, A2-4 and A2-6) was submitted to the EPA in August 2019.

	Answer	Condition Number	Non Compliance	Observation
5.6 Have bypasses of the air emissions abatement systems occurred within the last 12 months?	Not Applicable			

	Answer	Condition Number	Non Compliance	Observation
5.7 If bypasses did occur, has the licensee maintained a record of all bypass events?	Not Applicable			



6. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation
6.1	Were specified actions taken at the WWTP to protect the environment?	No		Yes
Comment / Corrective Action				
The impermeable hardstand beneath the sludge storage area is not sufficiently extensive areally to adequate to capture all potential run-off from this area for diversion to the on-site WWTP.				
Corrective Action Required:				
As discussed on site the licensee shall extend the impermeable area, and with adequate slope, such that all potential run-off in this area is diverted to the on-site WWTP.				

	Answer	Condition Number	Non Compliance	Observation
6.2	Was the location of sampling ports at emission point reference numbers A1-1, A1-2 & A1-3 appropriate?	Yes	6.5	
Comment / Corrective Action				
Following an EPA site visit in 2018 (Site Visit Reference SV11203) the Licensee relocated the sampling port at the boiler emission point A1-3 so that it is a minimum five duct diameters downstream of the bend in the ducts, thus enabling laminar flow to be measured. A1-1 and A1-2 were correctly positioned and did not require corrective action.				

	Answer	Condition Number	Non Compliance	Observation
6.3	Firewater retention	Checked	3.10	
Comment / Corrective Action				
Condition 3.10.1 requires the licensee to prepare and implement, with the approval of the EPA, a suitable risk management programme for firewater retention. This was required to be fully implemented within six months of the date of the revised licence (i.e. by 07/09/2019). A report on same was subsequently submitted to the EPA on 21/11/2019.				

	Answer	Condition Number	Non Compliance	Observation
6.4	Stormwater	Checked		Yes
Comment / Corrective Action				

During the site walkover the EHS manager indicated that the penstock at the stormwater discharge SW2 is normally closed. It is opened periodically by site staff to allow discharge depending on rainfall conditions e.g. during periods of heavy rainfall the penstock may be opened by site staff several times a day. This arrangement was put in place after an incident in 2015 (INCI007794) during which milk accidentally entered the stormwater system. The TOC monitor detected contamination in stormwater and triggered automatic closure of the penstock. However, there is a seven minute delay between TOC triggering and closure of the penstock.

It was also not clear during the site visit where run-off from the truck refuelling area in the southwestern area of the site is diverted to.

Corrective Action:

The licensee shall investigate whether the TOC monitor/automatic penstock closure system can be reconfigured/redesigned to eliminate the seven minute time delay. If this is not feasible then the licensee shall investigate the impacts, if any, of the current periodic discharge of stormwater to the receiving stream e.g. potential for scouring of stream bank/bed, increase risk of flooding downstream, adverse impact on water quality etc. A report on same shall be submitted to the EPA no later than 28/02/2020. Additionally, the licensee shall review whether the current arrangement of periodic discharge has any implications for risk management of firewater retention (referred to in Question 6.3 above).

6.5

	Answer	Condition Number	Non Compliance	Observation
Failure of bag filter at A2-4	Checked			Yes

Comment / Corrective Action

During the site visit inspectors observed white powder on the roof around emission point A2-4 (emission from Dryer 2). The licensee was instructed to investigate and if appropriate, report as an incident to the EPA. The licensee's subsequent investigations found that a bag filter on dryer 2 burst shortly after start up on the morning of 25/10/2019. This was reported to the EPA as an incident (Incident No. INCI017492).

Corrective Action:

The licensee shall respond to all requests for further information issued by the EPA in connection with the above incident. The licensee shall also identify and implement appropriate corrective and preventive actions to prevent a recurrence of a similar incident and update the above incident record with same.

The licensee shall address all observations made in this report and undertake corrective actions where required.

It is noted that a number of items were required to be completed by the licensee within six months of the date of the grant of the revised IE Licence P0963-02 but were not completed within the required timeframe. Going forward the licensee shall ensure to complete all actions required by the licence in a timely manner and by the required deadlines.

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 EPAs 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.