

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	Dawn Meats Ireland Unlimited Company
Licensee	Dawn Meats Ireland Unlimited Company
Licence Register No.	P0811-02
CRO Number	135414
Site Address	Greenhills, Beauparc, Navan, Meath
Site Visit Reference No.	SV22058

Report Detail	
Issue Date	12/02/2021
Prepared By	Oliver Gray

Site Visit Detail			
Date Of Inspection	28/01/2021		
Time In	14:30	Time Out	15:40
EPA Inspector(s)	Oliver Gray		
Additional Visitors			
Licensee Personnel and Role	Darragh O'Connor, Environmental Officer		

> Summary

Remote Compliance Assessment (RCA) to evaluate Dawn Meats Ireland Unlimited Company's (the licensee) compliance with the requirements of industrial emissions (IE) licence Reg. No. P0811-02.

During the RCA two non-compliances were recorded in relation to storm water monitoring and non-notification of an incident. One observation was raised in relation to groundwater monitoring.

> Site Areas Inspected

Not applicable (EPA remote compliance assessment).

> Documents Inspected

The following documents were inspected:

- Condition 6.1 and 11.6 - Storm water discharge monitoring records for 2020
- Condition 6.1 and 11.6 - Dissolved Air Flotation (DAF) sludge analysis results for 2020
- Condition 6.13.1 - Storm water daily visual inspection records for 2020
- Condition 6.15 - Noise Survey Report 2020
- Condition 6.17.1 - Groundwater monitoring results 2015 - 2020.

> 1. Food & Drink Sector: General

	Answer	Condition Number	Non Compliance	Observation
1.1	Were emission monitoring results compliant with licence conditions? and if not, were exceedances notified and appropriate corrective and preventative action taken?	Checked	6.1, 6.13 & 11.1	Yes
Comment / Corrective Action				
<p>A chemical oxygen demand (COD) result of 360 mg/l was recorded in the storm water discharge (emission point Ref. No. SW-2) on 18/11/2020. This COD result was above the sites trigger level (80 mg/l) and indicates that contamination of the surface water may have taken place, however, this has not been reported to the Agency as an incident.</p> <p>Corrective Action</p> <p>The licensee shall:</p> <ul style="list-style-type: none"> • submit the elevated COD result as an incident to the Agency through EDEN by 19/02/2021 • carry out an investigation to identify the source of any contamination • put in place measures to prevent further contamination and to minimise the effects of any contamination • notify the Agency of incidents as per Condition 11.1 of the IE licence. 				
	Answer	Condition Number	Non Compliance	Observation

1.2	Has the activity resulted in nuisance (noise, odour, dust) emissions during the last 12 months (complaints, monitoring results)? and what measures have been taken to address nuisance emissions (odour plan, noise reduction, dust suppression etc)?	Checked	5.4		
Comment / Corrective Action					
<p>There was no indication that the activity has resulted in nuisance emissions in 2020/2021.</p> <p>However, the licensee is reminded of the below instruction that was issued by the Agency on 10/03/2020 following a complaint in relation to noise from the installation in 2019 (our ref. COM009184) -</p> <p><i>'The licensee shall, as per the Schedule of Environmental Objections and Targets under Condition 2.2.2.7 of the licence, carry out a review of all operations and processes and evaluate practicable options for a reduction in noise emissions from the installation, by 10/04/2020.</i></p> <p><i>The licensee shall have regard to the on-site noise sources as outlined in Section 3.1 of the Noise Survey Report 2019 and in particular the 'refrigeration & air compressors' and 'air cooled condenser' when carrying out the review.</i></p> <p><i>The schedule shall include time frames for the achievement of set targets and shall be reviewed annually'.</i></p>					

1.3		Answer	Condition Number	Non Compliance	Observation
1.3	Is there an indication that contamination of storm water has occurred?	Checked	6.13		
Comment / Corrective Action					
See Section 1.1.					



2. Site Specific Issues

2.1

	Answer	Condition Number	Non Compliance	Observation
Storm water monitoring	Checked	6.1 & Schedule C.2.3	Yes	
Comment / Corrective Action				
The licensee's quarterly monitoring of storm water (emission point Ref. No. SW-2) for Q3 2020 did not include analysis for total nitrogen.				
Corrective Action				
The licensee shall ensure that storm water is monitored for the parameters as outlined in Schedule C.2.3 of the IE licence.				

2.2

	Answer	Condition Number	Non Compliance	Observation
Groundwater	Checked	1.5 & 6.17.1		Yes
Comment / Corrective Action				
Groundwater monitoring results showed that a number of parameters were elevated, such as the result of 2901 mg/l for chloride and 7920 µS/cm for conductivity at monitoring well M3 (adjacent to the effluent storage lagoon) on 30/06/2020.				
Corrective Action				
The licensee shall carry out a review of all groundwater monitoring results, including trend assessment, to determine the likelihood of any elevated results being due to the current activities within the boundary of the installation, licence Reg. No. P0811-02. The review shall also assess the impact of the decommissioning of the integrated constructed wetland on the groundwater quality. A report on the findings is to be submitted through EDEN under document type 'Site Updates/Notifications' by 09/04/2021.				
Please refer to the EPA's <i>Guidance on the Management of Contaminated Land & Groundwater at EPA Licensed Sites</i> , including guideline template reports, which are available at - https://www.epa.ie/pubs/advice/waste/contaminatedland/contaminatedland/ .				

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.