

# 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	
<b>Name of Installation</b>	Irish Cement Limited (Limerick)
<b>Licensee</b>	Irish Cement Limited
<b>Licence Register No.</b>	P0029-05
<b>CRO Number</b>	9212
<b>Site Address</b>	Castlemungret, Limerick
<b>Site Visit Reference No.</b>	SV13824

Report Detail	
<b>Issue Date</b>	07/12/2017
<b>Prepared By</b>	Maria Lenihan

Site Visit Detail					
<b>Date Of Inspection</b>	30/11/2017	<b>Announced</b>	No		
<b>Time In</b>	09:45	<b>Time Out</b>	12:45		
<b>Agency Personnel On Site</b>	Maria Lenihan Stephen McCarthy: Inspector				
<b>Licensee Personnel and Role</b>	Seamus Breen: Group Environmental Manager Pat Robinson: Plant Manager				
<b>Photo Taken</b>	No	<b>Samples Taken</b>	No	<b>Video Taken</b>	No
<b>Odour Assessment</b>	No				

## > Scope

This visit was undertaken to discuss revised licence P0029-05, issued on the 09th November 2017. This licence incorporates the requirements of Commission Implementation Decision 2013/163/EU, establishing the BAT conclusions on industrial emissions for the 'production of cement, lime and magnesium oxide'. This visit also focused on current noise mitigation measures being undertaken onsite, works undertaken to address fugitive dust emissions to date, the Environmental Liability Risk Assessment (ELRA) and the Closure, Restoration and Aftercare Management Plan (CRAMP) for the installation.

## > Media

Not applicable for this site visit.

## > Site Areas Inspected

Areas of the site inspected were:

- Quarry,
- Limestone crusher,
- Blendomat building,
- Homogenising silo,
- Cement mill 6,
- Cement mill 7,
- Petcoke storage area,
- Coal mill,
- Old kiln yard area,
- Control room.

## > Documents Inspected

Not applicable for this site visit.



## 1. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation	
1.1	Air emissions monitoring at A2-01 and A2-02	Checked	6.1	No	Yes
<b>Comment / Corrective Action</b>					
<p>Revised licence P0029-05 requires the monitoring of a number of additional parameters at emission point A2-01 and A2-02.</p> <p><b>CORRECTIVE ACTION REQUIRED</b></p> <p>The licensee shall ensure that the additional parameters, for emission point A2-01 and A2-02, are included for monitoring in Quarter 4 2017. Submit the results of this monitoring event to the Agency via a licensee return by the 31/01/18.</p> <p>You are required to take the above corrective action within the specified timeframe and to maintain documentary evidence of the action having been taken. The Agency may follow up on this matter at any time to ensure compliance with your licence.</p>					
	Answer	Condition Number	Non Compliance	Observation	
1.2	ELRA & CRAMP	Checked	10 & 12.2	No	Yes
<b>Comment / Corrective Action</b>					

The Agency requires the submission of an up to date ELRA and CRAMP for revised licence P0029-05.

Ensure the ELRA addresses the following:

- Provide an up to date enforcement history and complaint history,
- Ensure release of dust from Kiln 6 (e.g. preheater tower or cooler tubes) is included as a risk and addressed in terms of mitigation,
- Ensure fugitive dust emissions are included as a risk and addressed in terms of mitigation,
- Ensure the full costs of environmental clean-up and remediation are included, e.g. groundwater pump and treat capital and operating costs.

Ensure the CRAMP addresses the following:

- Provide an up to date enforcement history and complaint history,
- Provide verified details of the quantity of asbestos containing materials on-site and demonstrate that the removal cost has been covered,
- Provide detail for quarry restoration as follows:
  1. Provide a map showing areas to be flooded versus non-flooded,
  2. For non-flooded areas, identify what measures will be taken in terms of restoration, soil, grass, screening and planting,
  3. Identify the quantities of materials required (soil, seed, plants) and the source of same (on-site versus off-site). Identify the cost of sourcing and placing soil and for planting,
  4. Identify any overburden mounds on-site and clarify what will be done with these,
  5. In terms of quarry perimeter fencing, identify what is in place, any additional safety/security measures necessary and the costs e.g. chain link fencing; hawthorn fencing; earthen berms; boulders and step down,
  6. Ensure aftercare monitoring costs are provided for,
  7. Ensure all quarry rehabilitation costs are transferred into the concluding table of costs.

The licensee shall respond without delay with a proposed timeframe for submission of the completed ELRA and CRAMP. The reports shall be submitted via EDEN.

You are required to take the above corrective action within the specified timeframe and to maintain documentary evidence of the action having been taken. The Agency may follow up on this matter at any time to ensure compliance with your licence.

Revised licence P0029-05 was discussed in detail onsite. Noise mitigation measures currently being undertaken onsite were reviewed and discussed as well as an ELRA and a CRAMP for the installation. The licensee was given two observations relating to air monitoring, ELRA and CRAMP, which will require actions to be taken, by the licensee, by dates specified in the report. These will be followed up by the Agency in future site visits.

## **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](http://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.