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	Enva Ireland Limited (Portlaoise)
Licensee	Enva Ireland Limited
Licence Register No.	W0184-02
CRO Number	317186
Site Address	Clonminam Industrial Estate, Portlaoise, Laois
Site Visit Reference No.	SV13783

Report Detail

Issue Date	22/12/2017
Prepared By	Joan Fogarty

Site Visit Detail

Date Of Inspection	27/11/2017	**Announced**		No	
Time In	13:40	**Time Out**		17:40	
Agency Personnel On Site	Joan Fogarty				
Licensee Personnel and Role	Gareth Kelly, Compliance Director; Anne Phelan, Group HSE Manager; David McKelvey, Environmental Administrator; Kevin Coll, HSE Co-Ordinator.				
Photo Taken	No	**Samples Taken**	No	**Video Taken**	No
Odour Assessment	Yes	**Odour Assessment Compliant**		Yes	

Scope

An odour assessment in the environs of Enva Ireland Ltd. (Portlaoise) was undertaken in response to a complaint of nuisance odour from a member of the public on 20/11/2017 and to assess compliance with the conditions of Licence Reg. No. W0184-02.

Media

The medium of interest was air.

Site Areas Inspected

The areas inspected during the site visit were the waste oil intake area, tank farm, carbon filter for Tank T19/Hodgefield Interceptor, newly enclosed IBC bund & digout bund, waste offloading bund, soil shed and adjacent solvent waste IBC storage area, yard area north and east of soil shed and the oil filter and paint processing building.

Documents Inspected

The documents inspected during the site visit were:

- Duty and standby capacity reports;
- Odour Management Programme.

1. Site Specific Issues

		Answer	Condition Number	Non Compliance	Observation
1.1	Offsite nuisance odours	Checked	5.3		Yes

Comment / Corrective Action

The Licensee's investigation into two recent odour complaints associated with the licensed site were discussed during the site visit. The Licensee's representatives stated that the source of the complaints had been investigated, and that an onsite source of these odours had not been identified.

No changes have occurred in the two weeks during which the complaints were received in respect of the processing methods, timelines of processing and accepting wastes, types of waste streams accepted and handled onsite, or abatement/control measures used to mitigate offsite nuisances. Additional infrastructure has been installed at the site to cover waste storage bays and this work had not been finalised at the time of the site visit. Daily odour assessments are completed during the work week including odour assessments being completed by an independent contractor.

The Licensee's representatives also stated that the goal of all changes being made to the site is to ensure emissions to air are non-odorous and are not dependant on dispersion by weather.

At the soil/solvent shed, IBC's that had been cut and lined with a plastic bag were observed to contain paint/solvent containers. A strong solvent odour was observed adjacent to this storage location at the site and the EPA Inspector was concerned that this storage location and/or packaging method for this waste type could give rise to offsite nuisance odours. The Licensee's representatives stated this building would be enclosed and sealed to control odours and mitigate the risk of nuisance odours arising offsite.

Corrective Actions:

The Licensee shall comply with Condition 5.3 and shall ensure no emissions, including odours, from the activities carried on at the site shall result in an impairment of, or an interference with amenities or the environment beyond the installation boundary or any other legitimate uses of the environment beyond the installation boundary.

The Licensee shall comply with Condition 3.22.2 and shall enclose all buildings that contain odorous or potentially odour-forming wastes at the site, to maintain the buildings under negative air pressure (unless otherwise agreed in advance with the EPA).

		Answer	Condition Number	Non Compliance	Observation
1.2	Has the grease removal equipment been installed on trade effluent discharges?	No	5.9.9 & 5.9.10		Yes

Comment / Corrective Action

The Licensee has notified the EPA in Licensee Return LR030254 that the site does not have a canteen or trade effluent discharge and that they have sought and received agreement from Irish Water that the installation of grease removal equipment is no longer required.

The EPA in response to LR030254 dated 18/12/2017 has sought written correspondence from Irish Water to this effect be submitted to the EPA in this regard.

Corrective Actions:

The Licensee shall submit to the EPA via EDEN written verification from Irish Water that the installation of grease removal equipment as required by Condition 5.9.10 is no longer required to be installed at the site.

	Answer	Condition Number	Non Compliance	Observation

1.3	Has the test programme for Carbon Filter abatement equipment been completed and submitted to EPA?	No	6.1.2 & 6.1.5	Yes	

Comment / Corrective Action

The Licensee is required to complete a test programme for abatement equipment at the site by 15/09/2017 and to submit this test programme to the EPA within one month of completion i.e. no later than 15/10/2017.

The Licensee has completed an olfactory test programme for the carbon filters at the site, but has not submitted this report to the EPA for review.

Corrective Actions:

The Licensee shall comply with Condition 6.1.5 and shall submit this test programme to the EPA for review without further delay.

The Licensee is reminded of Condition 6.1 and that a test programme is also required to be submitted for any additional abatement infrastructure installed at the site in the future, including the Regenerative Thermal Oxidizer which is due to be installed at the site before 15/06/2018.

		Answer	Condition Number	Non Compliance	Observation
1.4	Odour Impact Assessment & Odour Management Programme.	Checked	6.18.1 & 6.18.2		Yes

Comment / Corrective Action

The Licensee has undertaken an odour impact assessment and has developed an odour management programme for the site. The Licensee's representatives could not verify what, if any, recommendations were outstanding from the odour impact assessment undertaken at the site. The Licensee had not updated the existing odour management plan to include the steps to be taken by the Licensee upon receipt of an odour complaint.

Corrective Actions:

The Licensee shall comply with Condition 6.18.2 and shall ensure recommendations (if any) arising from the odour impact assessment are submitted to the EPA via EDEN as a request for approval and prior to implementation at the site.

The Licensee shall comply with Condition 6.18.1 and shall ensure the odour management programme identifies the steps to be taken by the Licensee in the event that an odour complaint is received, such steps to include an investigation to identify whether the installation is the source of the odour and, if necessary, implement appropriate measures to ensure that the odorous emission is ceased and prevented from recurring. The Licensee shall complete this update to the odour management programme without delay.

		Answer	Condition Number	Non Compliance	Observation
1.5	Waste Storage Plan and Fire Risk Assessment and Fire Water Retention Assessment	Checked	3.10 & 8.11.5 & 9.5	Yes	

Comment / Corrective Action

The Licensee's representative stated that there is no intended change to the waste storage plan (Condition 8.11.5) that had been developed under Licence Reg. No. W0184-01. However, the fire risk assessment report (Condition 9.5) is currently amalgamated with the fire water retention assessment report (Condition 3.10).

The Licensee was required to submit a report to the Agency for approval on the findings and recommendations of the fire water retention assessment within six months of the date of grant of this licence. This report has not been submitted to the EPA to date.

Corrective Actions:

The Licensee shall comply with Condition 9.5 and shall arrange for a review by an independent and appropriately qualified consultant of the fire risk assessment report to ensure it has regard to the EPA Guidance Note: Fire Safety at Non-Hazardous Waste Transfer Stations, 20 13 and the EPA Guidance on Fire Risk Assessment for Non-Hazardous Waste Facilities, 2016. The Licensee shall implement any recommendations in the fire risk assessment at the site without delay.

The Licensee shall comply with Condition 3.10 and shall ensure a risk assessment to determine if the activity should have a fire-water retention facility is carried out at the site. The Licensee shall submit a report to the Agency for approval on the findings and recommendations of the assessment without further delay. The Licensee shall have regard to the Environmental Protection Agency Draft Guidance Note to Industry on the Requirements for Fire-Water Retention Facilities when implementing Conditions 3.10.

The Licensee shall comply with Condition 8.11.5 and shall revise the waste storage plan to incorporate any recommendations arising from the fire risk assessment (if appropriate).

		Answer	Condition Number	Non Compliance	Observation
1.6	Storage of waste in unbunded locations	Checked	8.6	Yes	

Comment / Corrective Action

In the unroofed waste offloading bund, three 660 litre wheelie bins containing waste were observed stored unbunded i.e. on and outside the bund ramp.

Corrective Actions:

The Licensee shall comply with Condition 8.6 and shall ensure all waste is stored in designated areas, protected as may be appropriate against spillage and leachate run-off.

Odour Assessment

Date of odour assessment: 27/11/2017 **Start time:** 13:40 **Finish time:** 17:40

This odour assessment was undertaken by: Joan Fogarty, EPA OEE Inspector.

As per the criteria stated above an odour assessment was undertaken in accordance with EPA Air Guidance document AG5 (Odour Impact Assessment Guidance for EPA Licensed Sites).

Due to the findings of the odour assessment it is the opinion of this Inspector that the activities occurring on the premises of ENVA Ireland Limited (Portlaoise) were not in breach of Condition 5.3 of the Licence Reg. No. W0184-02 at the time of the assessment.

EPA Air Guidance document AG5 is available online at www.epa.ie

Summary

An odour assessment in the environs of Enva Ireland Ltd. (Portlaoise) was undertaken prior to visiting the facility. No odours were detected offsite during the odour assessment.

Three Non-Compliances were identified during the site visit that relates to the non-submission of the test programme for abatement equipment, the non-submission of the fire water retention assessment for the site and the storage of waste in non-bunded areas of the site.

Three Observations were identified in relation to offsite nuisance odours, the requirement to install grease removal equipment and the implementation of recommendations arising from the odour impact assessment and updating the odour management plan.

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.