

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	Saint-Gobain Construction Products (Ireland) Limited
Licensee	Saint-Gobain Construction Products (Ireland) Limited
Licence Register No.	P0519-03
CRO Number	11815
Site Address	In the townlands of Lisnabow, Kilmainham, Kells, Meath and in, the townlands of Knocknacran, Magheracloone, Drummond, Derrynascobe, Derrynaglah, Ballycartlan,, Enagh, Carrickmacross, Monaghan, A82PF99
Site Visit Reference No.	SV19218

Report Detail	
Issue Date	23/10/2020
Prepared By	Caroline Kelly

Site Visit Detail			
Date Of Inspection	01/10/2020		
Time In	10:00	Time Out	16:15
EPA Inspector(s)	Caroline Kelly David Mullan		
Additional Visitors			
Licensee Personnel and Role	John McGettigan, Environmental Health and Safety Partner		

> Summary

The site visit was carried out to evaluate the licensee's compliance with the requirements of industrial emissions (IE) licence register no. P0519-03. Three non-compliances were recorded relating to materials storage, failure to submit a Specified Engineering Works (SEW) proposal, and bunding. Eight observations were recorded which will require corrective action by the licensee.

In addition, an exit audit was conducted in response to licensee return reference No. LR052354 and proposed request for a Technical Amendment (TA) (Change Request Reference No. CR07832) to exclude an area of the site from within the licence boundary and to revise the Site Location Map (Drawing No. 165a - 24 - 99 (Mine site)) referenced in Condition 1.3 of the IE licence. The scope of the exit audit focussed on the condition of an area of restored land northwest of the Knocknacran open-cast mining area, which the licensee has requested be excluded from within the licensed boundary of the installation. The Agency will revert to the licensee in due course in relation to its assessment of the independent closure audit (ICA) submitted under LR052354 and Change request reference no. CR07832.

> Site Areas Inspected

The following site areas were inspected during the site visit:

At the production site:

- Bag mill plant warehouse
- Board manufacturing warehouse
- Logistics area
- Surface water lagoons
- Storm Water Emission Point Reference no.'s S6 and S14
- Air Monitoring Emission Point Reference no.'s AE1 and BE1

At the mine site:

- Maintenance yard
- Lagoons
- Emission Point Reference no. MSW-1
- Emission Point Reference no. MSE-1
- Open-cast mine at Knocknacran
- Area of restored land at Knocknacran subject to a Technical Amendment request.

> Documents Inspected

No documents were inspected during the site visit due to COVID-19 restrictions. The following documents and records were inspected prior to and subsequent to the site visit:

- Condition 1.3 - Site boundary map
- Conditions 1.3 and 1.4 - Independent Closure Audit and assessment document submitted under Licensee Return reference no. LR052354 and Technical Amendment (TA) request reference no. CR07832.
- Conditions 4.7, 5.1, 5.5 and 11.1 - Incident reference no. INCI019308 relating to a breach of dust deposition limit at monitoring location MS4, July 2020.
- Conditions 6.2 and 6.13- Emissions to water monitoring results for 2019 and 2020
- Condition 6.10 - Weekly drainage system visual inspection records
- Condition 6.15.1 - Records of visual inspection of surface water emission points
- Condition 11.6(vi) - Drainage map for the processing site submitted under Licensee Return reference no. LR052881

> 1. Surface Water Management

	Answer	Condition Number	Non Compliance	Observation
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1.1	Is there a response programme in place arising from the trend analysis of Total ammonia?	Checked	5.1/6.10/6.15.1		Yes
Comment / Corrective Action					
<p>The licensee submitted surface water monitoring data for all emission and compliance points for 2019 and 2020, Licensee return reference LR052881 refers. The licensee also submitted copies of visual inspections records of site drainage and emission points. The results for all parameters are below emission limit values other than sulphate at compliance point reference no. CP1 at the mining site (Compliance Investigation reference no. CI001693 refers)</p> <p>The Agency notes that monitoring data for April and May 2020, and visual inspection records for emission point reference no. S14 were not included in the submission.</p> <p>Corrective action:</p> <p>The licensee shall submit the following within two weeks of the date of issue of this report:</p> <ul style="list-style-type: none"> • monitoring data for emission point reference no. S14 for April and May 2020 • visual inspection records for emission point reference no. S14 for 2020. 					
		Answer	Condition Number	Non Compliance	Observation
1.2	Is the trend analysis of total Ammonia results available for each monitoring point?	Checked	5.1		
Comment / Corrective Action					
Results for ammonia are compliant with emission limit values. See section 1.1					



2. Site Specific Issues

2.1

	Answer	Condition Number	Non Compliance	Observation
Technical Amendment request	Checked	1.4		Yes
Comment / Corrective Action				
<p>The licensee has submitted a request for alteration of the licensed site boundary (Licensee Change Request reference no. CR07832 and Licensee Return reference no. LR052354 refer). The proposed area to be removed from the site boundary is delineated in pink in Figure 1, Appendix A of document 'Site Environmental Assessment' submitted under Licensee Return reference no. LR052354).</p> <p>The scope of the exit audit focussed on the condition of an area of restored land north west of the Knocknacran open-cast mining area and north west of the underground mine at Drummond, Co. Monaghan, which the licensee has requested be excluded from within the licensed boundary of the installation. The area was observed to be made ground with no vegetation. A clay berm was observed running along the northwest portion of the site. Storm water discharge point reference no. MSW-1 was not discharging at the time of the site visit. Surface water from this area is diverted via gravity pipe back towards Knocknacran open-cast mine and the lagoons.</p> <p>An overground pipe carrying water from the dewatering pump at Drumgossat mine was observed to be lying over the area to be excluded from the licensed boundary. The licensee advised that the overground pipe will be moved inside the proposed new licensed boundary.</p> <p>See Photograph Reference no. 145900.</p> <p>An independent closure audit (ICA) report relating to the area to be excluded from the licensed boundary was submitted under licensee return reference no. LR052354 and Licensee Change Request no. CR07832. The Agency will revert to the licensee in due course in relation to its assessment of the ICA.</p>				

2.2

	Answer	Condition Number	Non Compliance	Observation
Drainage map (processesing site)	Checked	3.9/ 6.10/11.6 (vi)		Yes
Comment / Corrective Action				
<p>Subsequent to the site visit, the licensee submitted a drainage map for the processing site, Licensee return reference no. LR052881 refers.</p> <p>The submitted drainage map does not include/does not include sufficient detail of the following:</p> <ul style="list-style-type: none">• surface water flow direction• location of all monitoring and emission point locations• location of all oil separators/interceptors and silt traps• location of all sumps and pumps• location of shut-off valves. <p>Corrective action:</p> <p>The licensee shall, within two weeks of the date of issue of this report:</p> <ul style="list-style-type: none">• submit a revised drainage map for the processing site to include the above information• confirm that all oil separators/interceptors and silt traps are in accordance with I.S. EN-858-2: 2003 as required by Condition 3.9 of the IE licence• confirm whether or not the shut-off valves are manual or automatic.				

2.3

	Answer	Condition Number	Non Compliance	Observation
Pipeline and tank integrity	Checked	6.9		Yes

Comment / Corrective Action

During the site visit, the licensee stated that the site drainage pipelines and tanks had been integrity tested. Due to COVID 19 restrictions it was not possible to inspect these records at the time of the site visit.

Corrective action:

The licensee shall, within two weeks of the date of issue of this report, submit details of pipeline and tank integrity testing to demonstrate compliance with Condition 6.9 of the IE licence. The records shall identify sections of pipelines or tanks with reference to the revised drainage map required under Section 2.2 of this report.

2.4

	Answer	Condition Number	Non Compliance	Observation
Materials storage	Checked	8.7	Yes	

Comment / Corrective Action

On the date of the site visit, the EPA inspectors noted large stockpiles of rejected/off-specification gypsum board intended for reuse. These stockpiles were stored on permeable ground in a storage area to the rear of the facility.

This is non-compliance with Condition 8.7 of the IE licence.

Corrective Action:

The licensee shall ensure that the loading and unloading of materials is carried out in designated areas protected against spillage and leachate run-off in accordance with Condition 8.7.

2.5

	Answer	Condition Number	Non Compliance	Observation
Hardstanding and yard area	Checked	5.5, 6.10, 6.15.3, 8.7		Yes

Comment / Corrective Action

On the date of the site visit, the EPA inspectors noted a build up of dust and wet gypsum sludge on the hardstanding areas in the storage yard and adjacent to the board manufacturing warehouse. Silt laden water was observed flowing into drainage system.

The Agency inspectors also noted that several areas of hardstanding in the materials storage yard and adjacent to the board manufacturing warehouse was cracked and/or in poor repair.

Corrective action:

The licensee shall, within one month of the date of issue of this report, submit:

- Details of any yard and storage area maintenance programme, including timeframes for the repair of cracked hardstand areas
- A programme for reduction of sulphate levels in storm water discharges at the processing site in accordance with Condition 6.15.3 of the IE licence. The programme shall identify any preventative measures associated with the maintenance of yards, storage, and loading and unloading areas.

2.6

	Answer	Condition Number	Non Compliance	Observation
Bunding	Checked	3.7.4	Yes	

Comment / Corrective Action

On the date of the site visit, the EPA inspectors observed fill points on Intermediate Bulk Containers (IBCs) in the board manufacturing warehouse were located outside the bunded area, Photograph reference no. 113321 refers.

This issue was raised during a previous site visit, Site Visit reference no. SV18316, Section 1.1 refers.

This is a non-compliance with Condition 3.7.4 of the IE licence.

Corrective Action:

The licensee shall comply with Condition 3.7.4 of the IE licence and ensure that all outlets are within the bunded area.

2.7

	Answer	Condition Number	Non Compliance	Observation
Ambient dust monitoring	Checked	4.7/ 5.1/6.1/1.19.1/ 9.1 Schedule C.4		Yes

Comment / Corrective Action

On the date of the site visit, the EPA inspector observed that dust monitoring location reference no. MS4 was free of obstruction from overhanging vegetation. The licensee advised that the vegetation had been cut back as part of corrective actions related to the breach of the specified limit value of 350mg/m2/day in July 2020, reported under Incident reference number INCI019308.

The EPA issued an instruction under Incident reference no. INCI019308 requiring the licensee to establish additional dust monitoring locations and a map detailing the additional dust monitoring locations was to be submitted in response to the incident. A response was due by 15/09/2020, however, this has not been submitted to date.

Corrective action:

The licensee shall submit the required response to Incident reference no. INCI019308 without delay.

2.8

	Answer	Condition Number	Non Compliance	Observation
Specified Engineering Works (SEW)	Checked	3.17.1	Yes	

Comment / Corrective Action

On the date of the site visit, the EPA inspectors observed that a hazardous waste storage area had been constructed, Photograph reference no. 115554 refers.

Condition 3.17.1 requires that the licensee shall submit proposals for any Specified Engineering Works (SEW), as defined in Schedule D: Specified Engineering Works, to the EPA for agreement at least two months in advance of the intended date of commencement of any such works and that no such works shall be carried out without the prior agreement by the EPA.

Under Site Visit reference no. SV181316, Section 1.7, the EPA required the licensee to submit an SEW proposal for agreement in advance of the construction of the hazardous waste storage area. An SEW proposal was not received in advance of construction.

This is a non-compliance with Condition 3.17.1.

Corrective action:

The licensee shall ensure that all SEW proposals are submitted for agreement at least two months in advance of commencement of any works as required under Condition 3.17.1.

The EPA will assess the submission detailing the construction of the hazardous waste storage area, received under licensee return reference no. LR052882 on 06/10/2020, in due course and revert to the licensee as required.

2.9

	Answer	Condition Number	Non Compliance	Observation
Air monitoring	Checked	5.1/6.2		Yes

Comment / Corrective Action

On the date of the site visit, the EPA inspectors requested the submission of monitoring reports for 2020 for Emission Point Reference no.'s AE-1 and BE-1 as a licensee return following the site visit. These reports have not been received to date.

Corrective action:

The licensee shall submit monitoring reports for 2020 for air emissions point reference no.'s AE-1 and BE-1 in response to this site visit report.

2.10

	Answer	Condition Number	Non Compliance	Observation
Oil separator/Interceptor at mine maintenance yard	Checked	3.9		Yes

Comment / Corrective Action

On the date of the site visit, the licensee advised that a replacement Class I oil separator/interceptor had not yet been installed but that installation works were planned.

A non-compliance (reference no. NC016635) in relation to this issue was previously raised in site visit reference no. SV20377, Section 2.2.

Corrective Action:

The licensee shall comply with Condition 3.9 and ensure that the corrective actions are carried out without delay.

The licensee shall:

- Install a Class 1 interceptor at the maintenance yard
- Install a failure alarm at the interceptor
- Confirm the installation of the above as a licensee return through EDEN.

2.11

	Answer	Condition Number	Non Compliance	Observation
Oil pipeline at maintenance yard	Checked	3.12/6.12		Yes
Comment / Corrective Action				
<p>On the date of the site visit, the EPA inspectors observed that works were being carried out at the oil pipeline in the maintenance yard in response to corrective actions required under site visit report reference SV20377, Section 2.2. The licensee advised that hardstanding would be constructed under the oil pipeline as required.</p> <p>Corrective action:</p> <p>The licensee shall submit a licensee return confirming the installation of the hardstanding under the oil pipelines when complete.</p>				

2.12

	Answer	Condition Number	Non Compliance	Observation
Waste transformer	Checked	8.5/8.6		Yes
Comment / Corrective Action				
<p>A disused transformer, with a manufacturing date of 1977, was observed the store area adjacent to the board manufacturing warehouse.</p> <p>Corrective action:</p> <p>The licensee shall ensure that the transformer is tested for Polychlorinated Biphenyls (PCBs) and shall ensure that it is transported and disposed of appropriately in accordance with Conditions 8.5 and 8.6 of the IE licence. Records of the disposal of the transformer shall be kept on site for inspection by the EPA.</p>				



Photographs



Photograph reference no. 113321 – outlets not within bunded area



Photograph reference no. 115554 – new hazardous waste storage area



Photograph reference no. 145900 - Exit audit area restored area north-west of Knocknacran open-cast mine.

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.