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.

The licensee may also be requested to provide a response to the Environmental Protection Agency (hereafter referred to as the Agency) in relation to the site visit report findings.

Licensee

Name of Installation	Masonite Ireland
Licensee	Masonite Ireland Unlimited Company
Licence Register No.	P0021-02
CRO Number	229654
Site Address	Derryoughter, Drumsna, Carrick-on-Shannon, Leitrim
Site Visit Reference No.	SV29366

Report Detail

Issue Date	22/05/2024
Prepared By	Eimear Kelly

Site Visit Detail

Date Of Inspection	17/04/2024		
Time In	09:35	**Time Out**	15:20
EPA Inspector(s)	Eimear Kelly Mick Henry		
Additional Visitors			
Licensee Personnel and Role	Michael Rowley - Environmental Technician Camilla Batista - Environmental & Sustainability Leader Kieran Rooney - Plant Manager Emma Lalwani - WWTP Operator		

Summary

The Agency carried out this site visit as part of the OEE annual site visit programme to evaluate the licensee's compliance with the requirements of the licence. The licensee was found to be compliant with its Licence in relation to the areas inspected during this site visit. Six observations were raised in relation to a toxicity test reporting, formaldehyde-eliminator trial, communications programme, site ownership, biodegradability of wastewater and energy usage reporting. The issues raised require action to be taken by the licensee as specified in this report.

Site Areas Inspected

The following areas were inspected:

- Storm water settlement ponds;
- Emissions to water emission point reference No's. EO1 and EO2 and composite samplers;
- Wastewater treatment plant (WWTP);
- Continuous monitoring equipment display screen;
- Wet and dry fuel storage area;
- Electro-static precipitator (ESP);
- General yard areas;
- Raw materials and hazardous waste bund;
- Diesel tank external bund;
- WWTP SCADA;
- Storm water culvert;
- Log yard.

Documents Inspected

The following documents were inspected:

- Annual Environmental Report 2023;
- Objectives and targets 2024;
- Emissions to water monitoring data 2024;
- Storm water emissions monitoring data 2024;
- Noise report 2024;
- Groundwater monitoring report 2024;
- Air emissions monitoring reports 2024;
- Solvent management plan;
- Emergency response procedure;
- Bund register and integrity testing reports;
- Wastewater treatment plant check sheets;
- Bund inspection checksheet;
- Oil interceptors waste records;
- Hazardous waste records and certificates of destruction;
- MBR membrane maintenance schedule and records;
- Monitoring equipment calibrate certificates.

1. Health and Safety

		Answer	Condition Number	Non Compliance	Observation
1.1	Was safe and permanent access to sampling/monitoring points provided?	Yes	3.5		

2. Compliance & Reporting

		Answer	Condition Number	Non Compliance	Observation
2.1	Have the items noted during the previous inspection of this facility been addressed by the licensee?	Yes	2.2.2.5		

		Answer	Condition Number	Non Compliance	Observation
2.2	Did the licensee submit an EPR return for calendar year 2022 and calendar year 2023 (the latter being due by 31st March 2024)?	Yes	11.7		

		Answer	Condition Number	Non Compliance	Observation
2.3	Are storm water visual inspections being carried out as required?	Yes	6.12.1		

Comment / Action Required

Daily storm water visual inspections records were inspected and are being carried out at the required frequency.

		Answer	Condition Number	Non Compliance	Observation
2.4	Has the licensee installed any additional temporary/ emergency power generation units over the past 12 months?	Checked	1.4		

Comment / Action Required

The licensee has not installed any additional temporary/emergency power generators at the installation within the past 12 months.

		Answer	Condition Number	Non Compliance	Observation
2.5	Has the licensee changed fuel types over the past 12 months (other than as provided for in the licence)?	Checked	1.4		

Comment / Action Required

The licensee has not changed fuel types over the past 12 months, reject board from the production is used to fuel the furnace.

3. Site Specific Issues

		Answer	Condition Number	Non Compliance	Observation
3.1	Emission to water toxicity results	Checked	11.10, Schedule B.2		Yes

Comment / Action Required

Emission to water results were reviewed during the site inspection and an exceedance of toxicity for the parameter Lemna Minor (Duckweed) was noted. Following the site inspection, the licensee submitted a correspondance and revised results report (LR084509) from the external laboratory used by the licensee for testing and analysis which demonstrated compliance with the emission limit value. However, the initial toxicity laboratory results reported a 72 hour test method was carried out and the revised report detailed that a 7-day EC50 to Lemna Minor (Duckweed) was carried out.

Action required:

The licensee shall:

- ensure that all reports shall be certified accurate and representative by the installation manager or a nominated, suitably qualified and experienced deputy;
- provide evidence from the external laboratory on how results were obtained for reporting in both reports (submitted under LR079434 and LR084509);
- confirm the installation was in production at the time toxicity sampling on the final effluent in August 2023 was carried out;
- submit emission to water toxicity testing results for any monitoring carried out in 2024 as a licensee return on EDEN;
- confirm whether a full suite of chemical testing was carried out on the sample analysed for toxicity testing in August 2023.

		Answer	Condition Number	Non Compliance	Observation
3.2	Communications programme	Checked	2.2.2.7		Yes

Comment / Action Required

The licensees standard operating procedure for a public awareness and communications programme was inspected. The SOP outlined how members of the public can obtain information at the facility however there was no campaign in place to ensure members of the public are informed concerning the environmental performance of the installation.

Action Required:

The licensee shall consider resuming the invitation to local residents to attend the installation to ensure that members of the public are informed and aware of the installations environmental performance.

		Answer	Condition Number	Non Compliance	Observation
3.3	Site ownership	Checked			Yes

Comment / Action Required

During the site visit, the licensee discussed the possibility of new ownership acquiring Masonite Ireland. It was noted that financial provision has not been required for the installation since 2021.

Action Required:

The licensee shall:

- revert to the Agency confirming whether or not there has been any change in the legal entity operating at the licensed site;
- submit a change of name request as a 'site update/notification' or licence transfer application through EDEN, as appropriate. The licensee shall adhere to the EPA Guidance for Licensees and Proposed Transferees on Licence Transfer Applications.
- In the event of new ownership, the licensee shall conduct a review of the financial provision for the installation and submit as a licensee return on EDEN.

		Answer	Condition Number	Non Compliance	Observation
3.4	Biodegradability of wastewater	Checked	Schedule B.2		Yes

Comment / Action Required

Final effluent results were reviewed and the interrelationship between BOD and COD results were discussed. It was noted that the licensee has not developed a BOD:COD ratio to indicate the biodegradability of the wastewater.

Action required:

Establish an average COD:BOD ratio for wastewater emissions, based on several wastewater samples and submit the results on EDEN as a licensee return within 30 days of the date of issue of the report.

		Answer	Condition Number	Non Compliance	Observation
3.5	Formaldehyde-Eliminator Trial	Checked			Yes

Comment / Action Required

The licensee was conducting trials in the primary process lines to investigate whether the addition of The Formaldehyde-Eliminator Type HL770 to the resin can reduce the levels of free formaldehyde in the door panels. Emissions monitoring testing has been conducted to evaluate any impact on the abatement system. The licensee stated that sample results obtained from the scrubber abatement system were high and that investigations were on-going as to why the trail failed.

Action required:

The licensee shall provide justification for trial results carried out to date and upon completion of further trails, submit the results including all emissions monitoring carried out as a licensee return on EDEN.

		Answer	Condition Number	Non Compliance	Observation
3.6	Energy usage reporting	Checked			Yes

Comment / Action Required

Energy usage data was reviewed including data for quantities of trim boards used as fuel for the furnace verses the overall total tonnage quantities reported for 2023.

Action required:

Submit the data for quantities of trim board used as fuel for the furnace in 2023. The data should be presented to show correlations for quantities of trim board used as fuel verses the impact on the overall emissions from the facility.

FOLLOW-UP ACTIONS

The licensee is required to complete the actions outlined in this site visit report within the specified timeframes. Where required, the licensee shall also respond to actions specified in Compliance Investigations and/or submit a response to this site visit report via the EDEN system. The licensee shall maintain a documentary evidence, for review by the Agency, that the prescribed actions were completed within the required timeframe.

(i) Compliance Investigations

The Agency may generate a Compliance Investigation through the EDEN system and issue instructions and actions to the licensee. The licensee will receive notification when an instruction or action is issued and the licensee must respond to the actions within the Compliance Investigation within the specified timeframe.

(ii) Response to Site Visit Report

Where the licensee is requested to (or wishes to) respond to the Agency in relation to this site visit report, the licensee may select the 'Make a Response' link on the Site Visits page in EDEN where a .pdf document containing the response can be attached and submitted. The response should include details of the actions taken by the licensee to address the issues raised in this site visit report and the target completion dates. This Licensee Public Response provides the licensee with an opportunity to inform both the Agency and the public about the implementing of actions set out in the Agency site visit report. The response must be submitted **within 21 calendar days** of the issue date of this site visit report.

(iii) Publication of Reports

This site visit report will be published on the EPA's website, www.epa.ie, 30 calendar days after the site visit report issue date.

Any licensee response to this site visit report will be published on the EPA's website simultaneously (i.e. 30 calendar days after the site visit report issue date).

Please note that licensees are required to comply with the conditions of the licence at all times, and where non-compliance occurs, compliance must be restored within the shortest possible time. These actions will be verified during subsequent Agency visits. Please quote the above Inspection Reference Number in any correspondence in relation this Report.