

# 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	
<b>Name of Installation</b>	Mondelez Ireland Production Limited (Coolock)
<b>Licensee</b>	Mondelez Ireland Production Limited
<b>Licence Register No.</b>	P0809-01
<b>CRO Number</b>	8306
<b>Site Address</b>	Malahide Road, Coolock, Dublin 5, Dublin
<b>Site Visit Reference No.</b>	SV25697

Report Detail	
<b>Issue Date</b>	10/08/2022
<b>Prepared By</b>	Eileen McKenna

Site Visit Detail			
<b>Date Of Inspection</b>	30/06/2022		
<b>Time In</b>	10:00	<b>Time Out</b>	11:30
<b>EPA Inspector(s)</b>	Irene Doyle Eileen McKenna		
<b>Additional Visitors</b>			
<b>Licensee Personnel and Role</b>	Padraig Nolan - Facilities & Environmental Manager Gavan Doyle - Tank & Drain Services Paul Reinhardt - CBRE facilities management Paul McDonnell - Operation manager tank and drain Glen Cahill - Tank and drain operator Matthew Carroll - Inland Fisheries Ireland Roisin O Callaghan - Inland Fisheries Ireland		

## > Summary

The site visit was conducted in conjunction with Inland Fisheries Ireland (IFI) to follow up on the previous site visit (ref. SV25587) observations and the actions in the compliance investigation ref. CI002006 that was opened by the Agency on 31/05/2022 in relation to the algal growth (sewage fungus) in the Santry River immediately at and downstream of the storm water monitoring point SW3. Also, the site visit was used to follow up on the unauthorised pipe upstream of SW3.

During the site visit, it was noted that the source of contamination was identified on site and corrective actions were taken by the licensee to manage the incident and avoid recurrence. The site visit confirmed that there was no requirement for remediation work to be carried out in the Santry River. Also, the unauthorised pipe identified upstream was decommissioned.

The licensee was found to be compliant with its licence at the time of the Agency site visit. A number of observations was raised in relation to the stormwater monitoring data and visual inspection records and the standard operational procedures.

The issues raised require action to be taken by the licensee as specified in this report and in compliance investigation ref: CI002006

## > Site Areas Inspected

The following areas were inspected on site:

- Storm water discharge points SW2 & SW3
- River Santry adjacent to the site boundary
- Attenuation pond
- General yard area
- Grease trap chamber BGT3

## > Documents Inspected

The following document was inspected:

- Environmental Non Compliance and Spill Incident Notification report.

## > 1. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation
1.1	Source of contamination in the Santry River	Checked	5.1	Yes
<b>Comment / Action Required</b>				

Following the previous site visit that was carried out on the 10/05/2022, a compliance investigation was opened to request the licensee to carry out an investigation into the source of contamination of the algal growth (sewage fungus) immediately at and downstream of the storm water monitoring point ref. SW3.

From the investigation, the licensee identified the source of contamination of the algal growth (sewage fungus) in the Santry River at SW3. The investigation involved a CCTV survey of the site stormwater drainage system on the 11th to 13th May 2022.

The survey concluded that there was cross contamination from a process effluent grease trap ref. BGT3 (next to manhole 4-21) to an adjacent section of the stormwater drain between manhole S82 – S83. The chamber walls of the grease trap BGT3 and stormwater drain was found to have structural defects.

The licensee carried out further investigations into the process effluent drainage line which was found to have structural defects of a short length of the line between manhole 4-21 and 4-20. The trade effluent was also seeping into the defected area of the stormwater line. Remediation works have been completed on the structural defects that were identified during the CCTV survey. Subsequently after the site visit, the licensee submitted an up to date site map highlighting the areas that were repaired during the investigation into the source of contamination (compliance investigation ref. CI002006, refers).

The River Santry and emission point ref. SW3 was visually inspected on the day of the site visit. There was no observation of algal growth in the River and it was confirmed on the day of the site visit that there was no requirement to carry out any remediation works of the River. Also, there was an active discharge at the time of the site visit. The licensee was previously instructed to notify the Agency prior to the recommencement of the discharge however, the licensee did not notify the Agency of the recommencement of the discharge to the Santry River. The licensee confirmed that the discharge recommenced on 24/06/2022 following the completion of the incident investigation and remedial works of the site drainage lines. Also, the licensee noted that the stormwater line to emission point ref. SW3 was jetted and washed to remove any residues of effluent prior to recommencement of the discharge. Following the site visit, the licensee was requested to submit the stormwater monitoring data for SW3, however the Agency has not received this data to date.

#### Action required

The licensee is required to submit the weekly stormwater monitoring data which should include the following additional parameters:

- Ammonia,
- BOD,
- Phosphate

and the visual inspection records for SW3 from 24/06/2022 (to date), without delay, by responding to the opened compliance investigation ref. CI002006 under CI Action ref. A114653.

1.2

	Answer	Condition Number	Non Compliance	Observation
Standard Operational Procedures	Checked	11.9 (vii), 6.1 & Schedule C		Yes
<b>Comment / Action Required</b>				

The licensee's incident investigation report was reviewed and one of the corrective actions specified in the report was to review and improve procedures for inspection of discharge to river.

**Action required**

The licensee shall, in accordance with condition 11.9, demonstrate that the following procedures are in place:

- Up to date Standard Operational Procedures for all processes, plant and equipment necessary to give effect to this licence or otherwise to ensure that standard operation of such processes, plant or equipment does not result in unauthorised emissions to the environment.
- Procedure to ensure that sampling, analyses, measurements, examinations, maintenance and calibrations as set out under Condition 6.1 and Schedule C of the licence are in place.

The licensee is required to submit this information to the Agency by responding to compliance investigation ref. CI002006 under CI Action ref. A114418 by 15/08/2022.

## 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 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 30 calendar days** of the issue date of this site visit report.

### (iii) Publication of Reports

The site visit report will be made available for public viewing via the Agency's Licence Enforcement Access Portal (LEAP), within one day of the issue date. The Site Visit Report and the Licensee Public Response will also be published on the Agency's website, [www.epa.ie](http://www.epa.ie), 60 calendar days after the site visit report issue date (on the Licence Details Page for the relevant licence).

**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.**