

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	Healthbeacon Limited
Licensee	Healthbeacon Limited
Licence Register No.	W0308-1
CRO Number	530689
Site Address	Unit 18, Naas Road Business Park, Muirfield Drive, Naas Road, Dublin 12, Dublin, Dublin, D12 PF63
Site Visit Reference No.	SV31562

Report Detail	
Issue Date	03/03/2025
Prepared By	Ellen Brogan

Site Visit Detail			
Date Of Inspection	30/01/2025		
Time In	14:31	Time Out	16:27
EPA Inspector(s)	Ellen Brogan		
Additional Visitors			
Licensee Personnel and Role	Siobhán Linden, Site Manager		

> 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 its Licence.

The licensee was found to be non-compliant with its Licence at the time of the Agency site visit. One non-compliance was recorded in relation to bund integrity testing. In addition, the licensee was given a number of observations in relation to site drainage map, waste deemed unsuitable for processing, and waste records. The issues raised require action to be taken by the licensee as specified in this report. In addition, the licensee is required to submit a response to the non-compliances raised in this site visit report within 30 days of the date of issue of this report (using the 'Make a Response' link on the Site Visits page in EDEN as outlined in the final section of this report).

> Site Areas Inspected

The following areas were inspected during the site visit:

- Processing room;
- Unprocessed waste storage; and
- Processed waste storage area.

> Documents Inspected

The following documents were inspected as part of the site visit:

- Site visit reports (ref. SV28378 & SV24200);
- ADR transport document;
- Hazardous waste transfer form;
- Waste in & out records;
- Waste processing diagram; and
- Waste acceptance and processing procedure.

> 1. Hazardous Waste Transfer Station Sector

	Answer	Condition Number	Non Compliance	Observation
1.1	Checked	8.8, 3.12		Yes
Comment / Action Required				
The licensee was unable to demonstrate clear procedures and sufficient training in place for actions to be taken if waste other than 18 01 03 is taken in.				
The licensee was unable to provide a record of plastic lid waste dispatched from the facility.				
Action Required:				
The licensee shall:				
<ul style="list-style-type: none">• ensure a waste quarantine area is provided for waste unsuitable for processing at the facility, in accordance with condition 3.12 and 8.8.3;• ensure procedures are in place for the appropriate handling of waste unsuitable for processing at the installation, and staff are adequately trained on such procedures; and• maintain a record of materials imported and sent off-site for disposal/recovery, which includes all information as specified in condition 11.12.				

		Answer	Condition Number	Non Compliance	Observation
1.2	Are the destination facilities authorised and suitable to accept the wastes dispatched from the facility?	Yes	8.2.2		
		Answer	Condition Number	Non Compliance	Observation
1.3	Is all waste stored at the facility for less than 6 months?	Yes	1.1		
		Answer	Condition Number	Non Compliance	Observation
1.4	Has the licensee identified any storm water discharge point(s) from the facility?	No			



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		

	Answer	Condition Number	Non Compliance	Observation
2.2	Did the licensee submit an EPR return for calendar year 2023 and calendar year 2024 (the latter being due by 31st March 2025)?	No	6.10	Yes

Comment / Action Required

The licensee failed to submit an Environmental Performance Report (EPR) for the calendar year 2023. The EPR for calendar year 2024 is due on 31/03/2025.

Action Required:

The licensee shall submit an Environmental Performance Report (EPR) for the calendar year 2023 without delay.

	Answer	Condition Number	Non Compliance	Observation
2.3	Has the licensee installed any additional temporary/ emergency power generation units over the past 12 months?	No	1.4	

	Answer	Condition Number	Non Compliance	Observation
2.4	Has the licensee changed fuel types over the past 12 months (other than as provided for in the licence)?	No	1.4	



3. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation
3.1	Bund Integrity Test	Checked	6.7.4	Yes
Comment / Action Required				
<p>The licensee was unable to demonstrate that an integrity test had been completed for the IBC bund.</p> <p>This is non-compliant with condition 6.7.4.</p> <p>Action Required:</p> <p>The licensee shall, without delay, carry out testing of the integrity and water tightness of all bunds and submit as a licensee return via EDEN the results of the tests.</p>				

	Answer	Condition Number	Non Compliance	Observation
3.2	Swab Test	Checked	1.1	Yes
Comment / Action Required				
<p>In accordance with the licence application, the licensee stated that regular swab testing is to be carried out on cleaned bins and work surfaces as part of their standard procedures. The licensee was unable to demonstrate such testing is carried out, at the time of the site visit.</p> <p>Action Required:</p> <p>The licensee shall carry out swab testing in accordance with the licence application.</p>				

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.