

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	Electricity Supply Board (West Offaly Power)
Licensee	Electricity Supply Board
Licence Register No.	P0611-02
CRO Number	N/A
Site Address	Shannonbridge, Offaly, N37 C840
Site Visit Reference No.	SV17011

Report Detail	
Issue Date	05/11/2019
Prepared By	Helen Boyce

Site Visit Detail					
Date Of Inspection	17/10/2019	Announced	No		
Time In	14:00	Time Out	16:10		
Agency Personnel On Site	Helen Boyce				
Licensee Personnel and Role	Eimear Dennehy - Station Chemist and Environmental Co-ordinator Cathal Chapman - Production Manager				
Photo Taken	No	Samples Taken	No	Video Taken	No
Odour Assessment	No				

> Scope

The scope of the site visit was a routine check on licence compliance.

> Media

Items inspected related to the following media:

- air
- water
- soil

> Site Areas Inspected

Areas inspected on site were as follows:

- waste storage
- sulphuric acid and caustic storage
- gas oil tank
- waste oil tanks
- Licence information sign
- settlement pond
- cooling water inlet and pump house
- PS-SW1 discharge channel
- peat tipping point
- peat storage and delivery area

> Documents Inspected

Documents inspected were:

- Running hours year to date
- Hours Off-load year to date (2 shut downs to date)
- CRAMP/DMP/ELRA and associated financial provision (post-inspection)



1. Air Monitoring

	Answer	Condition Number	Non Compliance	Observation
1.1	Is volumetric flow being determined by calculation?	Yes		

	Answer	Condition Number	Non Compliance	Observation
1.2	Has the calculation methodology been validated, and submitted to the EPA for agreement?	Yes		

Comment / Corrective Action

Please refer to Section 1.3 below.

	Answer	Condition Number	Non Compliance	Observation
1.3	Have there been any ELV breaches in non-continuous monitoring of emissions to atmosphere in the last 12 months?	Yes		

Comment / Corrective Action

While the calculation method for flow was agreed by the EPA, physical measurement of the flow on 06/03/2019 showed an exceedance of the emission limit value for flow at PS-A1 emission to air and a non-compliance (NC013810) was issued relating to this. A meeting was held between the EPA and Licensee in May 2019 to discuss the non-compliances relating to volumetric flow at West Offaly Power.

A summary of the key issues for ESB was provided including the fact that the probe collar juts 100mm into the stack causing the probe to be inserted further than necessary thus impacting on the flow values measured. It was agreed that ESB would arrange steeplejack inspections on the stack in early 2020 to determine the suitability of making adjustments to the probe collar. Once the remedial works are notified to the EPA, the EPA will arrange to conduct monitoring on the emissions to air.

> 2. Reporting

	Answer	Condition Number	Non Compliance	Observation
2.1	Yes			
<p>Comment / Corrective Action</p> <p>A report entitled "IED Licence Implementation Protocol January 2016" determines start up and shut down periods as per the requirements noted above.</p>				

	Answer	Condition Number	Non Compliance	Observation
2.2	Yes			
<p>Comment / Corrective Action</p> <p>Please refer to Section 2.1 above.</p>				

	Answer	Condition Number	Non Compliance	Observation
2.3	Yes			

	Answer	Condition Number	Non Compliance	Observation
2.4	Yes			
<p>Comment / Corrective Action</p>				

Comment:

Condition 10.2.1 of Licence P0611-02 requires that "The licensee shall maintain, to the satisfaction of the Agency, a fully detailed and costed plan (DMP) for the decommissioning or closure of the site or part thereof, other than the landfill area in which waste has been deposited". The DMP/CRAMP was submitted to the EPA on 13/10/2016 and approved on 01/02/2017. The associated financial provision was provided in the form of a company guarantee which covers both the CRAMP and ELRA (in perpetuity) for the West Offaly Power site and was agreed by the EPA on 19/02/2018.

Condition 10.2.2 requires that "the licensee shall prepare and maintain, to the satisfaction of the Agency, a fully detailed and costed plan (CRAMP) for the closure, restoration and aftercare management of the on-site landfill or part thereof. The CRAMP shall be submitted to the Agency for agreement within six months of the date of grant of this licence in relation to the Ash Disposal Facility.

The CRAMP is detailed in the DMP/CRAMP Rev 03 submitted to the EPA on 13/10/2016 and approved on 01/02/2017. The associated financial provision was agreed on 19/02/2018 by the EPA via a bank letter of credit which expires on 08/02/2021.

Action Required:

As required by Condition 10.2.3, the plans (DMP and CRAMP) should be reviewed annually and any proposed amendments notified (as a Licensee Return) to the Agency for agreement.



3. Surface Water/Groundwater Protection

3.1

	Answer	Condition Number	Non Compliance	Observation
Is the cooling water discharge compliant with the ELVs in the relevant schedule of the licence, for the last 12 months?	No	5.5		
Comment / Corrective Action				
There have been non-compliances with Condition 5.5 of the licence in the past year due to the cooling water discharge from the installation and non-compliances (NC014990 and NC014576) have been issued in relation to this.				

There were no new non-compliances noted at this inspection. Notifications were previously issued to the licensee of non-compliances associated with emissions to air and water. A number of observations were made which should be addressed to ensure continuous improvement and compliance with the requirements of the licence.

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.