

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	Arran Chemical Company Limited
Licensee	Arran Chemical Company Limited
Licence Register No.	P0110-03
CRO Number	94943
Site Address	Units 1-3, Monksland Industrial Estate, Athlone, Roscommon, N37DN24
Site Visit Reference No.	SV28046

Report Detail	
Issue Date	11/09/2023
Prepared By	Simon Buckley

Site Visit Detail			
Date Of Inspection	15/08/2023		
Time In	11:10	Time Out	16:30
EPA Inspector(s)	Simon Buckley		
Additional Visitors			
Licensee Personnel and Role	Cyril Furey, Environmental Manager		

> Summary

The inspection was undertaken in order to assess the licensee's compliance with the requirements of the licence and to investigate recent incidents (Incident Ref. No`s. INCI025893 and INCI025720) reported to the Agency.

One non-compliance was recorded concerning the open incidents under investigation. The Agency is concerned by the continued instances of non-compliance with regard to emissions to air (NC027490 refers). The Agency is considering opening a compliance investigation in relation to this matter. One observation was also raised regarding integrity testing records.

Both issues require corrective actions to be undertaken by the licensee within the timeframe, and in the manner, specified in this report.

> Site Areas Inspected

- general yard areas
- continuous emissions monitoring (CEMS) unit
- thermal oxidiser
- carbon scrubber unit
- effluent tanks and bunds
- centrifuge.

> Documents Inspected

- objectives and targets
- sewer emissions monitoring records
- storm water monitoring records
- pipeline integrity testing records
- odour management plan.

> 1. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation
1.1	Open Incident Ref. No`s INCI025893 and INCI025720 concerning by-pass events	Checked	5.1	Yes
<p>Comment / Action Required</p> <p>The licensee is troubleshooting and optimising the operation of the regenerative thermal oxidiser to decrease and eliminate the number of by-pass events. Notwithstanding this non-compliant discharges to atmosphere were recorded on the 8th, 9th, 10th, 17th and 18th of August 2023 (NC027490 refers). Bypasses of an extended duration were also noted on 11th, 13th and 14th of July 9th and 10th, 16th and 18th of August and reported to the Agency under INCI025720. The licensee is also planning a trial to test how a "buffer tank" installed into the vent header to the RTO will remove variations in vent header flow to reduce short bypasses.</p> <p>Corrective Action</p> <p>The licensee shall on or before 21/09/2023 submit, to the Agency, stand alone incident close out report`s for Incident reference No. INCI025893 and INCI025893. The close out reports shall at a minimum, identify the nature, cause and source of the incidents and any emissions arising therefrom, evaluate the environmental pollution, if any, caused by the incident, the conclusions of the "buffer tank" trial, clearly detail the corrective and preventative measures put in place to prevent reoccurrence of similar incidents and a timeline for expected normal operation of the RTO such that by-passes are an unusual event.</p>				
	Answer	Condition Number	Non Compliance	Observation
1.2	Bund integrity testing	Checked	6.10	No
				Yes

Comment / Action Required

Bund integrity test records were evaluated. The records indicate that bund integrity testing has been done but a copy of the schedule of testing needs to be amended to cover the 2023 period.

Corrective Action

The licensee shall submit to the Agency on or before 15/09/2023 the updated and amended schedule of testing for all bunds, sumps and pipelines on site.

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.