

# 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	
<b>Name of Installation</b>	Anglo Beef Processors Ireland t/a ABP Nenagh
<b>Licensee</b>	Anglo Beef Processors Ireland Unlimited Company
<b>Licence Register No.</b>	P0184-01
<b>CRO Number</b>	217122
<b>Site Address</b>	Grange, Nenagh, Tipperary
<b>Site Visit Reference No.</b>	SV18109

Report Detail	
<b>Issue Date</b>	19/07/2019
<b>Prepared By</b>	Anthea Southey

Site Visit Detail					
<b>Date Of Inspection</b>	03/07/2019	<b>Announced</b>	No		
<b>Time In</b>	13:00	<b>Time Out</b>	16:25		
<b>Agency Personnel On Site</b>	Anthea Southey Brendan Kissane				
<b>Licensee Personnel and Role</b>	Fergal Maguire, Environmental Officer Don O'Brien, Plant Manager				
<b>Photo Taken</b>	Yes	<b>Samples Taken</b>	Yes	<b>Video Taken</b>	No
<b>Odour Assessment</b>	No				

## > Scope

The purpose of the site visit was to investigate an incident reported by the Nenagh Anglers Association and by Inland Fisheries to the EPA that occurred on the night of 02/07/2019. The incident was concerning an unauthorised discharge of raw effluent from a pipeline at ABP Nenagh to the River Nenagh. The River Nenagh has been identified as a priority area for action under the Water Framework Directive (2003).

## > Media

The following media were considered relevant to the site visit:

- Water
- Effluent
- Air

## > Site Areas Inspected

The following areas were inspected prior to going on-site:

- River Nenagh upstream and downstream of the primary discharge point (WEP1) and the secondary discharge pipe (unauthorised discharge location)
- River bank adjacent to ABP Nenagh

The following areas were inspected during the site visit:

- Storm water discharge point (SEP1)
- Manhole on the foul line outside of the boning hall (Ref: F18 or FMH21)
- Manhole on the foul line in centre of yard prior to mechanical screen (Ref: FMH19)
- Wastewater treatment plant (WWTP)
- Composite sampler at emission point (WEP1)

## > Documents Inspected

The following documents were inspected during the site visit:

- Site drainage drawing (Dated 25/05/2011)
- Pipeline integrity test report (February 2019)



## 1. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation	
1.1	Unauthorised discharge to the River Nenagh	Checked	6.1	Yes	
<b>Comment / Corrective Action</b>					

The EPA were notified by Inland Fisheries Ireland and the Nenagh Anglers Association of an incident involving a discharge of effluent from ABP Nenagh (IEL Reg. No. P0184-01) to the River Nenagh between 21:30 pm and 00:30 pm on 02/07/2019. The calls were received on the EPA out of hours line on 02/07/2019. A representative from Inland Fisheries Ireland went on-site and met with the Facility Manager at the time of the incident. Samples were taken by Inland Fisheries Ireland and replicate samples were provided to ABP Nenagh. An inflatable bung was used to seal off the end of the discharge pipe at the riverbank and the EPA was informed that the discharge ceased at 00.30 pm approximately.

The EPA inspectors commenced an investigation on 03/07/2019 at 13:00 hrs. They initially walked along the river bank opposite to ABP Nenagh where they met an Environmental Officer from the installation. The Environmental Officer indicated the location of the unauthorised discharge from the opposite side of the riverbank and it was noted by the inspectors that the pipeline was sealed with an inflatable bung. The EPA inspectors took photographs of 3 or 4 pipelines located along the riverbank because it was unclear why they were there or if there were in use. The EPA inspectors took water samples at the following locations for analysis in the EPA laboratory in Kilkenny:

1. River Nenagh upstream of the primary effluent discharge point (ref: WEP1);
2. River Nenagh downstream of the primary effluent discharge point and upstream of the unauthorised discharge pipe;
3. River Nenagh downstream of the unauthorised discharge pipe;
4. Final effluent composite sample collected in the previous 24 hours (ref: WEP1).

Replicate samples were taken and provided to the Environmental Officer from ABP Nenagh for analysis.

Preliminary results for the EPA samples are included in the Appendix of this report. The upstream sample (No.1) results are indicative of good quality surface water. The sample (No.3) taken downstream of the unauthorised discharge pipe did not indicate any residual impact on water quality following the incident. However, ammonia was found to be slightly elevated (Result = 0.060 mg/l N) in the sample (No.2) taken downstream of the primary effluent discharge point when compared to the EQS for ammonia in surface water bodies (Refer to below).

*High status surface water bodies (ammonia <0.040 mg/l N or <0.090 mg/ L N) and good status surface water bodies (ammonia <0.065 mg/l N or <0.0140 mg/l N) (Surface Water Regulations SI No. 272 of 2009).*

The EPA is issuing a non-compliance under Condition 6.1 of the licence following the unauthorised discharge to the River Nenagh which was notified to the EPA on 02/07/2019. It was also noted by the inspectors that there was a slight cloudiness in the River Nenagh downstream of the primary discharge point which shall be investigated by the licensee.

The EPA inspectors went on-site with the Environmental Officer and met the Facility Manager who provided a briefing on the incident. He stated that incident is still under investigation and that the discharge pipeline at the riverbank had not been identified prior to the incident taking place on 02/07/2019. The pipeline was considered to pre-date the EPA licensed site and the 6 inch clay pipeline was thought to have been exposed by a partial collapse of the riverbank. He stated that corrosion within the manhole (Ref: F18 or FMH21) on the foul line (outside of the chilling rooms and boning hall) permitted the effluent discharge through the old drainage pipeline and into the River Nenagh. During the site tour, the EPA inspectors looked at some manholes on the foul drainage line and they noted that some of the pipelines were in poor condition (some contained congealed animal fat) and the manholes were badly maintained and corroded. The Facility Manager acknowledged that there were outstanding repairs on the site drainage pipelines which had been last integrity tested in February 2019. It was noted that the identification of the manholes was unclear and some of the pipelines were not included on the site drainage drawings. The licensee was requested to submit details of the incident via EDEN and a report on the investigation without delay. The EPA stated that a compliance investigation will be opened as a result of the incident (Refer to Q1.2 below). Following the EPA site inspection, the licensee submitted an incident report on 03/07/2019 and a preliminary investigation report on 11/07/2019.

The site meeting was completed at 16:00 hrs and the samples were delivered to the EPA Laboratory at 18:00 hrs.

Answer	Condition Number	Non Compliance	Observation
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1.2

Compliance investigation on site drainage network and removal of unauthorised pipelines along the river bank	Checked	4.1, 4.2 9.3.5	Yes	
<b>Comment / Corrective Action</b>				
<p>The EPA is issuing a non-compliance under Condition 9.3.5 of the licence due to the poor integrity/condition of the site drainage pipelines and manholes as identified in the pipeline integrity test reports completed in February 2019.</p> <p>The EPA is opening a compliance investigation (Ref: CI001783) with the licensee as a result of the unauthorised discharge to the River Nenagh and the observations made by the EPA inspectors during the site visit.</p> <p>The licensee will be required to undertake the following corrective actions within the timeframes specified in the compliance investigation:</p> <ol style="list-style-type: none"> <li>1. CI Action A023226 - Undertake water quality monitoring in the River Nenagh commencing in July 2019 including physico-chemical monitoring (weekly basis) and a biological survey (u/s and d/s of the primary discharge point). A water quality investigation report shall be submitted to the EPA via EDEN by 31/10/2019.</li> <li>2. CI Action A023224 - Undertake a full assessment of the structural integrity and location of all drainage pipelines and manholes (process, foul and sewer) at ABP Nenagh by 31/07/2019. Implement a pipeline repair programme without delay and submit a summary report detailing the repairs and an updated site drainage drawing to the EPA via EDEN by 30/09/2019.</li> <li>3. CI Action A023225 - Undertake a survey of all pipelines located along the river bank and adjacent to ABP Nenagh. A report on the findings of the survey and corrective actions taken to remove the pipelines shall be submitted to the EPA via EDEN by 30/09/2019.</li> </ol>				



## Photographs



**Photo 1:** Waste water treatment plant (WWTP) at ABP Nenagh (taken from across the river).



**Photo 2:** One of the unidentified pipelines located along the riverbank by ABP Nenagh.



**Photo 3:** Additional unidentified pipelines along the river bank by ABP Nenagh.



**Photo 4:** Unidentified pipeline along the riverbank by ABP Nenagh. It was noted that the River Nenagh was slightly cloudy d/s of the primary discharge point (WEP1).



**Photo 5:** Manhole (Ref: F18) is located outside of the chilling rooms and boning halls (indicated by the white arrow). The unauthorised discharge pipeline at the riverbank was traced back to this manhole by the licensee. This manhole is on the foul line which carries effluent and washings from this area to the WWTP.



**Photo 6:** Photo taken inside the manhole (Ref: 18). The licensee considers that corrosion to the concrete within the manhole (indicated by the white arrow) permitted an unauthorised discharge of effluent and washings to the River Nenagh on 02/07/2019.



**Photo 7:** Photo taken in manhole (FM19) which is in very poor condition with an accumulation of congealed fat and solids in the foul pipelines leading to the WWTP.



## Appendix

EPA Laboratory Kilkenny – Preliminary Results for Nenagh Incident – ABP Nenagh P0184-01  
Analysis carried out on 4/7/2019.

Sample No.	Description	COD mg/l O <sub>2</sub>	Ammonia mg/l N	O-Phosphate mg/l P	Chloride mg/l Cl	TON mg/l N	Nitrite µg/l N	BOD mg/L O <sub>2</sub>
1	u/s of discharge	13	0.032	0.019	46.59	5.16	24.23	0.6
2	d/s of discharge	16	0.060	0.017	45.19	5.19	23.39	0.6
3	d/s of second discharge	13	0.020	0.018	49.49	5.21	23.51	0.7
4	Effluent 24 hr composite sample	56	0.025	0.053	977.65	16.62	3.48	<6

The EPA is issuing a non-compliance under Condition 6.1 of the licence following an unauthorised discharge to the River Nenagh which was notified to the EPA on 02/07/2019 by Inland Fisheries Ireland and the Nenagh Anglers Association. The discharge took place on 02/07/2019 between 9:30 pm and 12:30pm.

The EPA is issuing a non-compliance under Condition 9.3.5 of the licence due to the poor integrity/condition of the site drainage pipelines and manholes as identified in the pipeline integrity test report completed in February 2019.

The EPA is opening a compliance investigation (CI001783) with the licensee in order to investigate and eliminate all unauthorised discharges to the River Nenagh and to obtain a full understanding of the site drainage network and unauthorised pipelines located at the riverbank. The licensee will be required to complete the actions and submit reports to the EPA via EDEN within the timeframes specified.

## **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](http://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.