

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	Wellman International Limited
Licensee	Wellman International Limited
Licence Register No.	P0236-02
CRO Number	31341
Site Address	Mullagh, Kells, Meath
Site Visit Reference No.	SV31942

Report Detail	
Issue Date	07/11/2025
Prepared By	Laura Foley

Site Visit Detail			
Date Of Inspection	14/10/2025		
Time In	11:30	Time Out	13:40
EPA Inspector(s)	Laura Foley		
Additional Visitors			
Licensee Personnel and Role	James Colthurst - Environmental Manager Michael Sheridan - HSEQ officer		

> Summary

This site visit was carried out at Wellman International Limited (the licensee), Mullagh, Co Cavan (Reg. No. P0236-02), to follow up on storm water management and an ongoing open compliance investigation concerning odour management (Ref. No. CI002080).

The Agency carried out an off-site odour assessment in accordance with EPA Air Guidance document AG5 (Odour Impact Assessment Guidance for EPA Licensed Sites) in the vicinity of Wellman International Limited. Odour consistent with activities on site were not detected off-site.

The facility was in compliance with its licence at the time of the site visit. Three observations were raised in relation to waste storage, odour and storm water. These issues will require action by the licensee within the timeframes specified.

> Site Areas Inspected

The following areas were inspected:

- Fire water retention ponds,
- General yard area,
- Wind sock,
- NGR enhanced abatement system,
- Storm water drum screen, and
- Process buildings and administrations buildings.

> Documents Inspected

The following documents were reviewed prior to or during the site visit:

- Storm water and effluent monitoring data,
- Drainage maps (foul and storm water networks),
- Weather data from www.met.ie,
- Weather data from www.yr.no,
- Site location map,
- AG5 EPA Odour Impact Assessment Guidance, and
- Open, ongoing compliance investigation regarding odour (Ref. No. CI002080).

> 1. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation
1.1	Storm water	Checked	6.1, 6.15.2	Yes
Comment / Action Required				

Wellman International Limited (P0236-02) has been identified by the Agency as a Water Framework Directive (WFD) significant pressure due to the impact of the facility on the receiving surface water body, Moynalty_030.

The storm water monitoring programme was discussed.

The CCTV survey of the storm water network and foul network was discussed. The survey of the storm water network has been completed. Repairs to the storm water network have been delayed by the examinership process. The foul network integrity assessment, which was last completed in July 2022 and is due to be completed in 2025, was also delayed by the examinership process. The licensee reported that they plan to complete the foul network integrity assessment during Q1 2026. The repairs to the storm water network will be considered and prioritised along with the findings of the foul network survey.

Action required:

Submit as a site update/notification through EDEN:

- an update on the planned schedule for the foul network integrity survey, no later than 19/12/2025; and
- the 235-S storm water monitoring data in excel format for the period Jan 2023 through October 2025, no later than 04/12/2025.

1.2

	Answer	Condition Number	Non Compliance	Observation
Odour assessment	Checked	5.2		

Comment / Action Required

An odour assessment was undertaken by the Agency on 14/10/2025 in accordance with EPA Air Guidance document AG5 (Odour Impact Assessment Guidance for EPA Licensed Sites).

Odour consistent with activities on the site were not detected offsite.

The open, ongoing compliance investigation regarding odour (Ref. No. CI002080) was discussed. The recent NGR emission olfactometry odour monitoring results were discussed.

Action required:

- No later than 05/12/2025, submit via compliance investigation (Ref. No. CI002080) action A126513, an excel file containing all available odour and flow monitoring data for the NGR line. Present data in one single excel file. Place data in the same units in the same column with the unit at the top of the column (column header). Provide a trend graph of the odour data and provide interpretation as necessary.

1.3

	Answer	Condition Number	Non Compliance	Observation
Waste storage	Checked	8.5		Yes

Comment / Action Required

Waste plastic was observed stored in an uncovered skip at the rear of Warehouse 307. Small amounts of waste plastic were observed on the yard immediately around the skip. The licensee reported that this area is swept daily.

Action Required:

- Cover outdoor waste storage facilities to protect from leachate runoff and spillage in accordance with licence condition 8.5.
- Upload the programme of yard sweeping to the Agency as a site update/notification through EDEN no later than 10/12/2025.

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.