

# 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	
<b>Name of Installation</b>	Arran Chemical Company Limited
<b>Licensee</b>	Arran Chemical Company Limited
<b>Licence Register No.</b>	P0110-03
<b>CRO Number</b>	94943
<b>Site Address</b>	Units 1-3, Monksland Industrial Estate, Athlone, Roscommon, N37DN24
<b>Site Visit Reference No.</b>	SV29659

Report Detail	
<b>Issue Date</b>	21/03/2024
<b>Prepared By</b>	Simon Buckley

Site Visit Detail			
<b>Date Of Inspection</b>	28/02/2024		
<b>Time In</b>	11:00	<b>Time Out</b>	15:18
<b>EPA Inspector(s)</b>	Simon Buckley		
<b>Additional Visitors</b>			
<b>Licensee Personnel and Role</b>	Cyril Furey, Environmental Manager Shane Naughton, Environmental Supervisor		

## > Summary

The Agency carried out this site visit in response to open incident Ref. No. INCI026919, a follow up to the compliance meeting that occurred on 23/11/2023 and as part of the OEE local site visit programme to evaluate the licensee's compliance with the requirements of the licence in general.

Three observations were recorded which concern incident close out reporting, submission of further data and legacy groundwater contamination arrangements. The licensee is required to respond to the Agency concerning these matters on or before the specified due dates.

The licensee was found to be in compliance with the licence in relation to the areas inspected during the site visit.

## > Site Areas Inspected

- general yard areas
- continuous emissions monitoring (CEMS) unit
- thermal oxidiser
- carbon scrubber unit

## > Documents Inspected

- incident Ref. No. INCI026919
- licensee's EPA response letter Re: MTG000629
- correspondence with Uisce Eireann

## > 1. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation
1.1	Incident Ref. No. INCI026919 concerning by-pass events	Checked	5.1	Yes
<b>Comment / Action Required</b>				
At the time of the inspection the licensee had not submitted an incident close out report with regard to the extended by-pass events incident that occurred on 12/01/2024.				
<b>Corrective Action</b>				
The licensee shall on or before 30/03/2024 submit a close out report against incident Ref. No. INCI026919 (This was received by the Agency on 07/03/2024) . The licensee is reminded that incident close out reports shall be submitted against an incident as soon as reasonably practicable but in any event within 30 days of notification of an incident.				
	Answer	Condition Number	Non Compliance	Observation
1.2	Licensee Return Ref. No. LR082185 concerning meeting Ref. No. MTG000629	Checked	Schedule C.6	Yes
<b>Comment / Action Required</b>				

The following was noted:

- The licensee concludes that it is not feasible to re-circulate by pass stack gas into the Regenerative Thermal Oxidiser to prevent discharges at emission point Ref. No. A2-2
- The licensee has rented a FID to monitor and collect data during by-pass events so that a determination of the likely concentrations during a by-pass event can be quantified
- The licensee is of the opinion that there is no correlation between between COD measurements and THF measurements in groundwater samples due to its experience with historical testing of both parameters in scrubber water.

**Corrective Action**

The licensee shall submit on or before 30/04/2024 the following:

- any, data, document, record, photograph, communications, written statement and/or any other such materials that corroborate and substantiate the licensee's methodology/process or procedure utilised to conclude /justify/ or substantiate that re-circulation of by-pass stack gas is not feasible
- a site update/notification on the collection of data from the recent by-pass events and thereafter when a sufficient amount of data has been collected by the temporary FID installation submit all such data to the Agency and include a quantification assessment of the emissions discharged during the by-pass events
- as an excel file, all legacy THF and COD data collected in the historical scrubber water testing events showing the dates and results for each parameter.
- an excel file with results of all instances where THF and COD was analysed in the same groundwater samples for the last 5 years.

1.3

	Answer	Condition Number	Non Compliance	Observation
Legacy Groundwater Contamination	Checked	Schedule C.6		Yes

**Comment / Action Required**

The licensee is implementing a number of actions with regard to legacy groundwater contamination. The actions were discussed at length.

**Corrective Actions**

The licensee shall ensure the following in relation to groundwater contamination:

- every effort shall be made to liaise with other sites in the zone of contamination that may be affected by the historical contamination to ensure that concentrations of the contaminants of concern are being monitored and trended holistically
- establish trended graphs for each individual parameter (DCM, MTBE, TCE, Toluene, TBA and THF etc.) based on the historical data collected at the site up to the current year, the graphs shall show peaks, troughs and stable results over time and be generated from excel data which is easily interrogated, analysed and submitted as requested by the Agency

1.4

	Answer	Condition Number	Non Compliance	Observation
Air Emissions Monitoring	Checked	5.1		

**Comment / Action Required**

At the time of the inspection the Agency's Air Emissions Monitoring Team were also onsite. A separate and specific air emissions monitoring report will be issued by the Agency with regard to this in due course.

## **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](http://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.**