

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	Perma Pigs Limited
Licensee	PERMA PIGS LIMITED
Licence Register No.	P0431-02
CRO Number	553066
Site Address	Littlegrange, Drogheda, Louth
Site Visit Reference No.	SV27757

Report Detail	
Issue Date	01/12/2023
Prepared By	Laura Foley

Site Visit Detail			
Date Of Inspection	14/11/2023		
Time In	14:25	Time Out	15:50
EPA Inspector(s)	Laura Foley Irene Doyle		
Additional Visitors			
Licensee Personnel and Role	Jack Carolan - Farm manager		

> Summary

The Agency carried out this site visit as part of the OEE annual site visit programme to evaluate the licensee's compliance with the requirements of their licence.

The licensee was found to be non-compliant with its licence at the time of the Agency site visit. Four non-compliances were recorded in relation to the actioning items from a previous site visit, surface water, provision of 2022 annual environmental report (AER) and groundwater monitoring. In addition, observations were raised in relation to fertiliser register, Record 3 form, rainwater collection, handling of slurry, waste management, bunding and site details. The issues raised require action to be taken by the licensee as specified in this report.

In addition, the licensee is required to submit a response to the non-compliance(s) raised in this site visit report within 30 days of the date of issue of this report (using the 'Make a Response' link on the Site Visits page in EDEN).

> Site Areas Inspected

The following areas were inspected:

- Surface water monitoring points;
- Groundwater monitoring point GW1;
- Rainwater collection system;
- General yard area;
- Slurry extraction points;
- Slurry storage tanks;
- Dry feed tanks;
- Soya oil storage tanks, and
- Diesel tanks.

> Documents Inspected

The following documents were inspected:

- Waste record, 2023;
- Slurry storage capacity record, 2023;
- Groundwater monitoring results, 2023, and
- Surface water monitoring results, 2023.

> 1. Intensive Agriculture Sector

	Answer	Condition Number	Non Compliance	Observation
1.1	Based upon a stock register (piggeries) or record of birds placed (poultry) are the numbers in accordance with the numbers specified in the Schedule of the licence	Yes	1.5, Schedule (i)	
Comment / Action Required				

Stock number limitations under Schedule 1(i):

- Farrowing/Suckling Sows 300
- Dry Sows 1000
- Maiden Giits 200
- Boars 10
- Weaners 6500
- Finishers 3480

Stock Register on date of site visit:

- Sows 560
- Weaners 2,344
- Second stage & fatteners mix 3,553

	Answer	Condition Number	Non Compliance	Observation
1.2	Does the licensee have a method (fertiliser register) for recording the movement of organic fertiliser from the installation?	Checked	5.8.12	Yes
Comment / Action Required				
<p>The fertiliser register was not available for inspection at the time of the site visit.</p> <p>The licensee is reminded that a Slurry/Manure Register shall be maintained on site on a daily basis and shall be available for inspection by authorised personnel of the Agency at all reasonable times, in accordance with licence Condition 5.8.12.</p> <p>Action Required:</p> <p>The licensee shall upload as a licensee return through EDEN the fertilizer register for 2023, no later than 31 December 2023.</p>				

	Answer	Condition Number	Non Compliance	Observation
1.3	Has a 'Record 3 form' been returned to DAFM?	Checked	5.8.3	Yes
Comment / Action Required				
<p>Record 3 form(s) were not available for inspection at the time of the site visit.</p> <p>Action Required:</p> <p>The licensee shall upload as a licensee return through EDEN Record 3 form(s) for 2023, no later than 31 December 2023.</p>				

	Answer	Condition Number	Non Compliance	Observation
1.4	Has the licensee installed and maintained an adequate rainwater collection and storm water drainage system to prevent contamination of local surface water courses or groundwater?	Checked	7.1	Yes
Comment / Action Required				

A number of rainwater downpipes on pig housing units discharge to ground (photograph 1 refer).

Action Required:

The licensee shall maintain a rainwater collection and drainage system for all pig housing on-site. The licensee shall divert all uncontaminated surface water runoff, from roofs and non-contaminated impervious areas of the site, to the surface water drainage system, in accordance with licence condition 7.1.

1.5

	Answer	Condition Number	Non Compliance	Observation
Is the handling and removal of slurry/wash-water being carried out in a manner that adequately mitigates against the contamination of surface water or ground water at the facility?	Checked	7.3		Yes

Comment / Action Required

No groundwater and surface water protection measures were in place at the slurry store agitation access point (photograph 2 refer).

Action Required:

The licensee shall install a concrete pad at the slurry store agitation access point to ensure there are no unauthorised discharge of polluting matter to water, in accordance with licence condition 7.3.



2. Compliance & Reporting

2.1

	Answer	Condition Number	Non Compliance	Observation
Have the items noted during the previous inspection of this facility been addressed by the licensee?	No	2.1.1	Yes	
Comment / Action Required				
<p>The licensee was requested in site visit carried out on 10/12/2021(Ref. No. SV21711) to provide an up-to-date drainage drawing(s) of the installation, which identify licensed monitoring locations, to demonstrate that there are no unauthorised discharges from the installation. Drawing(s) were to be submitted as a licensee return through EDEN by 30/01/2022. These drawing(s) were not provided.</p> <p>This is non-compliant with licence Condition 2.2.1.</p> <p>Action Required:</p> <p>The licensee shall, no later than 31 January 2023, upload as a licensee return through EDEN a site drainage map in size A3, with the below clearly indicated using separate colours:</p> <ul style="list-style-type: none"> • clean yard areas; • dirty yard areas; • stormwater water network; and • foul water network. 				

2.2

	Answer	Condition Number	Non Compliance	Observation
Did the licensee submit an EPR return for calendar year 2021 and calendar year 2022 (the latter being due by 31st March 2023)?	Checked			
Comment / Action Required				
<p>The licensee has not submitted an EPR return for calendar year 2021 or calendar year 2022. Non-compliances have been issued.</p>				



3. Site Specific Issues

3.1

	Answer	Condition Number	Non Compliance	Observation
Surface Water	Checked	7.3, 7.4	Yes	
Comment / Action Required				
<p>Surface water monitoring is not to the satisfaction of the Agency, with the monitoring locations and parameters not as listed in the licence Schedule 4(i). The weekly surface water inspection record was not available for inspection at the time of the site visit.</p> <p>This is non-compliant with licence Condition 7.4.</p> <p>The cover on surface water emission point ST-3 is not sufficient to prevent water inflow or contamination (photograph 3 refer).</p> <p>A build up of sediment was present in surface water emission point ST-4 at the time of the site visit (photograph 4 refer); this may impede flow and/or lead to storm water contamination.</p> <p>Loose plastic foam beads was observed beside the gilt yard (photograph 5 refer), which may blow to surrounding surface water bodies.</p> <p>Action Required:</p> <p>The licensee shall:</p> <ul style="list-style-type: none"> • carry out surface water monitoring and visual inspections as per licence Condition 7.4 and Schedule 3(i); • upload as a licensee return through EDEN the laboratory certificate of analysis for quarter 1 (Q1) 2024 surface water monitoring no later than 15 March 2024; • upload as a licensee return through EDEN the record of the surface water visual inspections carried out during quarter 1 (Q1) 2024 no later than 15 March 2024; • install on storm water emission point ST-3 an impervious cover that will prevent water inflow or surface water contamination; • remove the build up of sediment in storm water emission point ST-4; and • clean and appropriately dispose of the loose foam material from the area beside the gilt yard and upload as a licensee return through EDEN a photo of the cleaned area no later than 31 December 2023. 				

3.2

	Answer	Condition Number	Non Compliance	Observation
Waste Management	Checked	5.7, 7.7		Yes
Comment / Action Required				
<p>Only the animal disposal records from July 2023 onward were available for inspection on site. Only the slurry storage capacity (freeboard) records up until week 18 (May) of 2023 were available for inspection on site.</p> <p>Action Required:</p> <p>The licensee shall, no later than 31 December 2023, upload as licensee returns to EDEN:</p> <ul style="list-style-type: none"> • waste removal record from January through July 2023, and • records of freeboard monitoring carried out from 2023 week 18 (May) through December 2023. 				

3.3

	Answer	Condition Number	Non Compliance	Observation
AER	Checked	11.5	Yes	
Comment / Action Required				

The 2022 AER has not been uploaded to EDEN by 01 February 2023 and was not available for inspection at the time of the site visit.

This is non-compliant with licence Condition 11.5.

Action Required:

The licensee shall complete and provide to the Agency (upload to EDEN) no later than 01 February of each year the AER for the previous calendar year as specified in licence Condition 11.5 and Schedule 4(i).

3.4

	Answer	Condition Number	Non Compliance	Observation
Groundwater Monitoring	Checked	7.12	Yes	

Comment / Action Required

Groundwater monitoring data for groundwater monitoring well GW2 was not available for inspection at the time of the site visit. Monitoring of groundwater well GW1 is not carried out for the parameters specified in Schedule 3(ii) of the licence.

This is non-compliant with licence condition 7.12.

The licensee is reminded that the groundwater monitoring programme may be altered only after approval by the Agency.

Action Required:

The licensee shall carry out groundwater monitoring as per license condition 7.12 and Schedule 3(ii).

The licensee is requested to upload as a licensee return to EDEN the annual groundwater abstraction rate (volume) for 2022 and also 2023 no later than 31 December 2023.

3.5

	Answer	Condition Number	Non Compliance	Observation
Bunding	Checked	7.11		Yes

Comment / Action Required

An intermediate bulk container (IBC) containing fly oil was not banded at the time of the site visit (photograph 6 refer).

Action Required:

The licensee shall ensure that all fuel tank storage facilities shall, prior to utilisation, as a minimum be banded, either locally or remotely, to a volume not less than the greater of the following;(i) 110% of the capacity of the largest tank or drum within the banded area(ii) 25% of the total volume of substance which could be stored within the banded area, in accordance with licence condition 7.11.

3.6

	Answer	Condition Number	Non Compliance	Observation
Site Details	Checked	1		Yes

Comment / Action Required

It was noted at the time of the site visit that the site contact details on EDEN are not up-to-date.

The licensee is reminded of the requirement to notify the Agency of any changes on site, including changes in ownership, structural changes to the drainage network, and infrastructural changes such as the removal of buildings.

Action Required:

The licensee shall, as soon as practicable, up date the site contact details (name(s), phone number(s) and email address(s) as applicable) as site updates on EDEN.



Photographs



Photograph 1: Rainwater downpipe on animal housing unit



Photograph 2: Slurry store agitation access point



Photograph 3: ST-3 surface water emission point



Photograph 4: ST-4 surface water emission point



Photograph 5: Foam beside gilt yard



Photograph 6: Fly oil IBC

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.