

# 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>	Mr Martin O'Donovan
<b>Licensee</b>	Mr Martin O'Donovan
<b>Licence Register No.</b>	P0621-02
<b>CRO Number</b>	
<b>Site Address</b>	Cooligboy, Timoleague, Bandon, Cork
<b>Site Visit Reference No.</b>	SV25563

Report Detail	
<b>Issue Date</b>	03/06/2022
<b>Prepared By</b>	Adrian Farrell

Site Visit Detail			
<b>Date Of Inspection</b>	06/05/2022		
<b>Time In</b>	10:15	<b>Time Out</b>	11:40
<b>EPA Inspector(s)</b>	Adrian Farrell Paul Buckley		
<b>Additional Visitors</b>			
<b>Licensee Personnel and Role</b>	Cathal O'Donovan - Site Manager		

## > Summary

The Agency carried out this site visit to:

- Investigate complaints regarding odour and noise (Complaint refs; COM015138 and COM015139);
- To progress Compliance Investigation ref; CI001994, and,
- To establish progress made at the licensed facility in relation to actions raised at a previous site visit (Site visit ref; SV24378).

Non-compliances were raised for:

- Operations outside of the licensed site boundary, and,
- Odour detected outside of the licensed site boundary.

Observations were raised for:

- Noise;
- Surface water management, and,
- Integrity assessment of all tanks, pipelines and other containment structures.

The licensee is required to submit a response to the non-compliances 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), as outlined in the follow-up actions section of this report.

## > Site Areas Inspected

The facility yard was inspected during this site visit.

## > Documents Inspected

No documentation was reviewed during this site visit.

## > 1. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation	
1.1	Operating outside of the licensed site boundary	Checked	1.4	Yes	No
<b>Comment / Action Required</b>					

During the site visit the licensee was found to be operating pig houses outside the licensed site boundary (Photos 1 and 2 refer). The EPA first noticed these pig houses in operation during a site visit on 09/06/2021 (site visit ref; SV22457 refers). A follow-up site visit was undertaken on 05/11/2021 which found that all 4 pig houses were stocked with pigs. Following this site visit the EPA issued a warning letter on 27/01/2022 serving notice under Section 82(2) of the EPA Act 1992, as amended to cease and desist the unauthorised operations, for activities falling under Class 6.2 of the First Schedule, unless and until the licensee has been granted a licence which authorises the operation of these unauthorised facilities.

The Inspectors undertook a pig count in the unauthorised facilities on 05/04/2022 (Site visit ref; SV25536 refers) and calculated that the number of pigs and pig types on site exceeded the thresholds for a Class 6.2 activity and that the facility requires authorisation from the EPA. The Agency has opened a Compliance Investigation (CI) requiring the licensee to cease operations outside the licensed site boundary (CI) ref; CI001994.

During this site visit the licensee indicated that pig numbers were similar to the numbers recorded during the last EPA site visit however, the licensee did not provide the most recent stock registers and indicated that these would be forwarded when they are available.

This is non-compliant with condition 1.4 of the EPA licence.

**Action required**

The licensee is required to cease and desist from operating outside the licensed site boundary forthwith, and revert via CI ref; CI001994 indicating that operations have ceased.

1.2

	Answer	Condition Number	Non Compliance	Observation
Stock Registers	Checked	1.5	No	Yes

**Comment / Action Required**

During the site visit the licensee did not have the stock registers for April available for inspection.

Following the site visit the licensee indicated that the stock numbers on site for the end of April 2022 were as follows:

- 1184 sows;
- 168 gilts;
- 5 boars,
- 4762 weaners, and,
- 6998 fatteners.

It is not clear whether these numbers refer to both the authorised and/or unauthorised facilities.

**Action required**

The licensee shall clarify pig numbers for both the authorised and unauthorised facilities and revert to the Agency with this information by 10/06/2022.

1.3

	Answer	Condition Number	Non Compliance	Observation
Odour	Checked	4.1 & 4.2	Yes	No

**Comment / Action Required**

An odour assessment was undertaken by the Agency on 06/05/2022, in accordance with EPA Air Guidance document AG5 (Odour Impact Assessment Guidance for EPA Licensed Sites). Intermittent, strong odours originating from the licensed and unlicensed installation were detected at a sensitive receptor beyond, and downwind of the installation boundary.

During the subsequent site visit, odours consistent with those detected off-site were experienced on-site along the eastern boundary of the licensed facility and from an partially covered slurry tank located at the licensed facilities (Photo 3 and 4 refers).

This is non-compliant with Condition 4.1 of the EPA licence.

The licensee previously indicated that the new facilities were built in accordance with Best Available Techniques (BAT) however, the licensee was not able to clarify if a documented assessment had been undertaken to show if the facilities fully comply with BAT.

**Action required**

The license shall;

- Comply with condition 4.1 to ensure that all operations on-site shall be carried out in a manner such that air emissions and/or odours do not result in a significant impairment of, or significant interference with amenities beyond the site boundary;
- In accordance with condition 4.2 submit the site's odour management plan, and,
- Undertake an assessment of the unlicensed facilities in accordance with BAT as given in the JRC Science for Policy Report "Best Available Techniques (BAT) Reference Document for the Intensive Rearing of Poultry or Pigs" 2017.

The licensee shall revert to the EPA on these matters by 10/06/2022.

1.4

	Answer	Condition Number	Non Compliance	Observation
Noise	Checked	6.1 & 10.3	No	Yes

**Comment / Action Required**

A complaint was received from a member of the public on 27/04/2022 indicating that noise perceived to be coming from fans on site was detectable at their property (Complaint ref; COM015139).

During the site visit, Inspectors noted that fans were audible on the eastern side of the licensed site and from the food storage facilities at the unlicensed facility.

**Action required**

In accordance with conditions 6.1 & 10.3 of the EPA licence the licensee shall undertake a noise survey in relation to both the licensed and unlicensed facilities. The survey programme shall be undertaken in accordance with the methodology specified in the 'Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)' as published by the Agency.

The licensee shall submit a noise survey report via licensee returns on EDEN by 28/06/2022.

1.5

	Answer	Condition Number	Non Compliance	Observation
Surface water management	Checked	7.2	No	Yes

**Comment / Action Required**

During a previous site visit on 15/02/2022 (Site visit ref; SV24378) silt laden water was found discharging to monitoring point ref; SW1. The Inspectors noted that there was potential for silt laden water to discharge at monitoring point ref; SW1 due to a lack of treatment (Photos 5 to 8 refer).

**Action required**

The licensee shall:

- Ensure that there is no discharge of polluting matter to water, and,
- Outline the steps taken to ensure that silt laden water is not discharged to surface water.

The licensee shall revert to the EPA on this matter by 10/06/2022.

1.6

	Answer	Condition Number	Non Compliance	Observation
Integrity assessment	Checked	7.12	No	Yes

**Comment / Action Required**

The licensee submitted a tank and pipeline integrity assessment report via licensee returns on EDEN (Licensee return ref; LR064395). The report however did not refer to a proposal/ programme for agreement on the assessment of underground and over ground effluent storage infrastructure.

The Agency submitted a further information request via Licensee Return ref; LR064395 requesting that a proposal be submitted by 10/02/2022 and, another reminder was issued via site visit report ref; SV24378 which was issued on 14/03/2022. However no further correspondence has been received from the licensee on this matter.

**Action required**

The licensee shall respond to the Agency's further information request issued via licensee return ref; LR064395 forthwith.



## Photographs



**Photo 1:** Photograph of facilities outside of the licensed site boundary.



**Photo 2:** Photograph of facilities outside of the licensed site boundary.





**Photo 3:** Photograph of facilities outside of the licensed site boundary.



**Photo 4:** Photograph of facilities outside of the licensed site boundary.



**Photo 5;** Photo of access road at licensed facilities.



**Photo 6;** Photo of access road at licensed facilities.





**Photo 7;** Photo of access road at licensed facilities.



**Photo 8;** Photo of access road at licensed facilities.



## Odour Assessment

---

**Date of odour assessment:** 06/05/2022    **Start time:** 09:15    **Finish time:** 09:40

**This odour assessment was undertaken by:** Adrian Farrell

---

As per the criteria stated above an odour assessment was undertaken in accordance with EPA Air Guidance document AG5 (Odour Impact Assessment Guidance for EPA Licensed Sites).

Due to the findings of the odour assessment and the subsequent post assessment site visit to your facility, it is the opinion of this Inspector that the activities occurring on the premises of Martin O'Donovan were in breach of Condition 4.1 of the facility's IPPC Licence.

EPA Air Guidance document AG5 is available online at [www.epa.ie](http://www.epa.ie)

## 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 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 30 calendar days** of the issue date of this site visit report.

### (iii) Publication of Reports

The site visit report will be made available for public viewing via the Agency's Licence Enforcement Access Portal (LEAP), within one day of the issue date. The Site Visit Report and the Licensee Public Response will also be published on the Agency's website, [www.epa.ie](http://www.epa.ie), 60 calendar days after the site visit report issue date (on the Licence Details Page for the relevant licence).

**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.**