



ENVIRONMENTAL PROTECTION AGENCY of LIBERIA
Department of compliance and Enforcement
MBI Spent Grain (BSG) Disposal Site Assessment Report



1.0 INTRODUCTION

On **September 2, 2024**, residents of Karnga Town reported alleged contamination of creeks in Blagai Town, Tehr District, Bomi County. An earlier complaint dated **June 23, 2024**, was also filed directly with Monrovia Breweries Incorporated (MBI), raising concerns over suspected water pollution caused by the disposal of brewery spent grains (BSG) in Blagai Town.

Community members reported that the contamination severely restricted access to safe drinking water, forcing them to source water from distant alternatives.

In response, the EPA assembled a technical team to:

- Verify the reported pollution,
- Assess compliance with permit conditions, and
- Recommend remediation and corrective measures.

On **September 24, 2024**, the EPA team visited the site, engaged with residents, carried out field analyses, and collected samples for laboratory testing. Results confirmed that several water quality parameters including **pH, turbidity, ORP, phosphate, DO, ammonia, and iron** exceeded Class III Liberia Water Quality Standards, indicating organic and nutrient pollution.

Based on these findings, the EPA issued a **Corrective Action Plan (CAP)** on **October 25, 2024**, requiring MBI to implement six key measures, including containment, storm-water management, nutrient reduction, leachate and odor control, community awareness, and compliance monitoring.

On **January 13, 2025**, MBI conducted a comprehensive review of the EPA's recommendations for corrective action. The company formally acknowledged and accepted all six directives, committing to implement them within one month beginning **January 20, 2025**, with an anticipated completion date of **February 19, 2025**. MBI further indicated that "robust measures" would be developed to ensure effective implementation.

This current assessment (August 2025) was therefore intended to **verify the implementation of MBI's written commitment and the corrective actions approved and acknowledged by the EPA.**

2.0 FINDINGS (FOLLOW-UP ASSESSMENT)

On **August 18, 2025**, the EPA Bomi County team, led by Inspector **Wellington L. Ben**, conducted a site assessment at the BSG disposal area between Karnga and Blagai Towns. The team was accompanied by **Mr. Momo Bility** of Blagai Town (Tel: 0777390931 / 0774355405).

Observations were as follows:

1. **Non-Implementation of CAP:** Despite MBI's January 2025 written commitment, none of the six corrective measures outlined in the EPA's CAP have been executed. No fencing, pavement, storm-water systems, odor control, or awareness programs were in place.
2. **Abandonment of Authorized Site:** MBI has abandoned the designated disposal site without EPA's approval and allegedly relocated to an undisclosed site.
3. **Site Degradation:** The abandoned site is overgrown, unmanaged, and residual waste remains in an environmentally unsafe condition.

3.0 CONCLUSION

The follow-up assessment establishes that MBI has:

- **Failed to comply with the Corrective Action Plan** issued on October 25, 2024, and their own written commitment of January 13, 2025,
- **Abandoned the permitted disposal site** without EPA notification or approval, and
- **Potentially relocated disposal activities** to an unknown location, increasing regulatory and environmental risk.

These actions represent material **non-compliance with EPA directives, CAP commitments, and permit conditions**, warranting immediate enforcement measures under the **Environmental Protection and Management Law (EPML)**.

4.0 RECOMMENDATIONS

1. **Notice of Violation (NoV):** Issue an NoV citing breach of the CAP, written commitments, and permit conditions.
2. **Administrative Fine:** Impose penalties as per EPML **Part XII – Offences and Penalties**.
3. **Mandatory Disclosure:** Require MBI to disclose the current disposal site immediately for inspection.
4. **Remediation Order:** Direct MBI to rehabilitate the abandoned Blagai site (removal of waste, leachate control, revegetation).
5. **Community Safeguards:** Reinforce monitoring and engagement with Karnga and Blagai residents, including water quality surveillance.
6. **Stakeholder Meeting:** Convene discussions with local stakeholders and MBI to determine reparations for affected communities, in line with EPA's March 24, 2025 follow-up communication.

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5.0 PICTORIAL OF THE SITE



