

Fingal County Council Comhairle Contae Fhine Gall

Ms. Dorota Richards
Environmental Protection Agency
Office of Licensing and Guidance
Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford
Ireland

Environmental
Protection Agency
10 FEB 2006

Your Reference: Letter dated 22nd December 2005 regarding SR Technics

Our Reference: Lt0001 – IPC 480 EPA License Review

7th February 2006

Reg. No. 766

Dear Ms. Richards

Further to your correspondence of the the 22nd December 2005 in relation to the revision of existing license IPC 480 Fingal County Council wish to make the following submission,

- It is confirmed that an Order under Section 22 of the Local Government (Water Pollution) (Amendment) Act, 1990, was made by Fingal County Council in 2005.
- Representatives from Fingal County Council and the Central Laboratory visited SR Technics, the revised discharge volumes approved by Fingal County Council are given below,

Discharge Volume (m ³ /day)	SE-1	SE-2	SE-3
Proposed Volume	175	140	200

- The Sanitary Authority Response sheet has been filled in for discharge SE-1, SE-2 and SE-3.
- A license review report has been prepared by the Central Laboratory in conjunction with Fingal County Council.

If you have any queries please do not hesitate to contact me on 01 8905905.

Yours sincerely

Ruth Woods

R. Woods
A./ Senior Executive Engineer
Water Pollution Control

EPA
Main File ☒
Public File ☒
Evaluation ☒ AL
Date 13/2/06 H



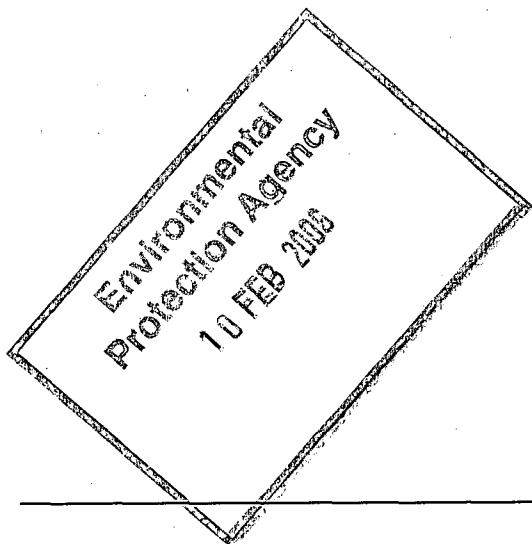
**Water Services
Department**
Postal Address
P.O. Box 174,
County Hall,
Swords,
Fingal,
Co. Dublin

**An Roinn Seirbhísi
Uisce**
Bosca 174,
Áras an Chontae,
Sord,
Fine Gall,
Contae Átha Cliath

Office Address
Grove Road,
Blanchardstown,
Fingal,
Dublin 15

Telephone
01 890 5970
Facsimile
01 890 5919
Email
waterservices@fingalcoc
o.ie





Central Laboratory, Engineering Department,
68/70 Marrowbone Lane, Dublin 8

Saotharlann Lárnach, Roinn Innealtóireachta,
68/70 Lána Mhuire Mhaith, Baile Átha Cliath 8
T. 01 222 4341 F. 01 454 4797 E. imelda.averill@dublincity.ie

Re : Review of **IPPC No.766** (Consents SE-1, SE-2 and SE-3).
SR Technics (Previously Team FLS Aerospace Ltd.), **MD 198, Facilities Building,**
Dublin Airport.

An EPA application for review of 3 IPPC consents issued to Team FLS Aerospace Ltd. in 1999 was received in Central Laboratory on 23/01/06. A site inspection was carried out on 30/01/06 with Mr. Jim Kavanagh, Water Pollution Inspector. Significant increases of daily discharge volumes (and consequently loadings) have been requested by SR Technics based on more accurate flow monitoring available since the issue of the original consents.

Discharge Volume (m3/day)	SE-1	SE-2	SE-3
Original Volume	60	60	15
Proposed Volume	175	140	200
Increased Volume	115	80	185

The processes giving rise to trade effluent on site have not changed since the IPC was issued but the volume of business has increased over recent years. The main Airport sewer system is owned and maintained by the Dublin Airport Authority. An order under Section 22 of the Water Pollution Act was made by Fingal County Council in 2005.

SE-1 (Wheel and Brake Shop)

Effluent generated in the catchment of SE-1 arises in Hangars 1 and 2 (western half).
Processes giving rise to trade effluent include :

- Aircraft Washing
- Electroplating Shop
Cadmium, Nickel, Chromium are plated. A Cadmium recovery unit is operational at this location. This comprises both a Bewet electrolysis cadmium abatement unit on the drag-out tank and an ion exchange system on the rinse bath overflow return water. Small amounts of cadmium also arise in airframe undercarriage washing operations in the hangars. The total mass cadmium emission to sewer in 2004 was 2.5 Kg.
- Wheel and Brake Shop
- Non-Destructive Testing (film processing unit with Silver recovery installed in 2003)

SE-2

Effluent generated in the catchment of SE-2 arises in Hangars 2 (eastern half), 3, 4 and 5. Processes giving rise to trade effluent include :

- Aircraft Washing
- Aircraft Deep Cleaning
- Canteen in the technical break room (fitted with a grease trap)

SE-3

Effluent generated in the catchment of SE-3 arises in the Garage and Hangar 6. Processes giving rise to trade effluent include :

- Vehicle washing at the rear of the Garage on an open ramp
- Aircraft washing in Hangar 6
- Restaurant effluent in Hangar 6 catering for 600 people (fitted with a grease skimming unit)

Blockage of the sewer with oils fats and greases, downstream of SE-3 has been reported by SR Technics.

SR Technics operate 7 days a week with some seasonal increase in workload in the winter off-peak flying period.

Chemical and monitoring conditions are attached for the consent reviews based on increased daily effluent volumes of **175** cubic metres (SE-1), **140** cubic metres (SE-2) and **200** cubic metres (SE-3) as advised by Mr.Jim Kavanagh, Water Pollution Inspector, Swords.

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SANITARY AUTHORITY RESPONSE

Name of Sanitary Authority : Fingal County Council

Address : P.O.Box 174
Fingal County Hall
Swords
County Dublin

Name of Facility : SR Technics
MD 198
Facilities Building
Dublin Airport

Consent granted subject to the consent conditions outlined below	Yes
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CENTRAL LABORATORY CONSENT CONDITIONS

IPC Register Number: 766 SE-1

GENERAL CONSENT CONDITIONS SE-1, SE-2 and SE-3.	Condition to be included (Yes/No)
1. No specified emission to sewer shall exceed the emission limit value set out in Schedule B : <i>Emission Limits to Sewer</i> . There shall be no other emission to sewer of environmental significance.	Yes
2. The Licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out in <i>Schedule C</i> .	Yes
3. Monitoring and analyses equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge.	Yes
4. The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus installed in connection with the trade effluent and to take samples of the process effluent.	Yes
5. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activities are being carried out unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternate sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.	Yes
6. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.	Yes
7. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and off-site points as required by the Agency.	Yes
8. No substance shall be present in such concentrations as would constitute a danger to sewer maintenance personnel working in the sewerage system or would be injurious to the construction of sewer or would interfere with the operations of a downstream wastewater treatment works.	Yes

9. No substance shall be discharged in a manner, or at a concentration which after initial dilution in the receiving waters to which the Sanitary Authority sewage is discharged , causes tainting of fish or shellfish.	Yes
10. No emission to sewer shall take place which gives rise to any reaction within the sewer or to the liberation of by-products which may be of environmental significance.	Yes
11. The licensee shall ensure that the effluent shall not contain petroleum hydrocarbons or organic solvents (including chlorinated organic solvents) which would give rise to flammable or explosive vapours in the sewer.	Yes
12. A summary report of the results of analysis of effluent discharged to the sewer shall be forwarded to the sanitary authority on an annual basis.	Yes
13. Non-trade effluent wastewater (e.g. firewater, accidental spillages) which occurs on site shall not be discharged to the sewer without the prior authorisation of Fingal County Council.	Yes
14. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid, alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer.	Yes

ADDITIONAL GENERAL CONSENT CONDITIONS (specify if required)	
15. A log detailing the usage of all cooling water and boiler water treatment chemicals shall be kept by the licensee and submitted to Fingal County Council on an annual basis.	
16. Best available technology shall be used to reduce cadmium in the trade effluent. The daily average discharge of cadmium shall not exceed 0.6 grams of cadmium per kilogram of cadmium used (0.06% by weight). The monthly average discharge of cadmium shall not exceed 0.3 grams per per kilogram of cadmium used (0.03% by weight).	
17. The Licensee shall maintain , or have maintained the effluent treatment systems.	

Limit Values for Trade Effluent to Sewer

Schedule B - Emissions to Sewer

Emission point reference no: **SE-1**

Emission to (sewer description): **Fire Lane between Hangar 1 Car Park and the Aer Lingus Tech Building**

Grid Reference : **31679E, 24359N**

Volume to be emitted: Maximum in any one day : **175.0 m³**
 _____ Maximum rate per hour : _____ m³

Parameter (delete parameters which are not applicable)	Emission	Limit Value		Parameter to be limited (Yes/No)
	Grab	Daily Mean	Daily Mean	
	Sample (mg/l)	Concentration (mg/l)	Loading (kg/day)	
BOD	1,200	1,000	175	Yes
COD	2,400	2,000	350	Yes
Suspended Solids	1,000	800	140	Yes
Sulphates (as SO ₄)	500	500	87.5	Yes
Detergents	100	100	17.5	Yes
Fats, Oils, Grease	100	100	17.5	Yes
pH	6 - 10	6 - 10	-	Yes
Temperature	42 degrees C	42 degrees C		Yes

ADDITIONAL PARAMETERS

Phosphates (as PO ₄ -P)	50	50	9.0	Yes
Cyanide (as CN)	1	1	0.2	Yes
Fluoride (F-)	50	50	9.0	Yes
Mineral Oils	10	10	2.0	Yes
Chromium (as Cr)	5	5	1.0	Yes
Silver (as Ag)	1	1	0.2	Yes
Nickel (as Ni)	5	5	1.0	Yes
Copper (as Cu)	5	5	1.0	Yes
Tin (as Sn)	5	5	1.0	Yes

Frequency of Monitoring Trade Effluent to Sewer

Schedule C - Monitoring of Emissions to Sewer

Emission point reference no: SE-1

Parameter	Monitoring Frequency	Sampling Method/Type (grab, continuous)
Flow to sewer		
BOD	Monthly	24-hr Composite
COD	Monthly	24-hr Composite
Suspended Solids	Monthly	24-hr Composite
Sulphates (as SO ₄)	Monthly	24-hr Composite
Detergents	Monthly	24-hr Composite
Fats, Oils, Grease	Monthly	24-hr Composite
Temperature	Continuous	Continuous
pH	Continuous	Continuous

ADDITIONAL PARAMETERS

(if required)

Phosphates (as PO ₄ -P)	Monthly	24-hr composite
Cyanide (as CN)	Monthly	24-hr composite
Fluoride (as F-)	Monthly	24-hr composite
Mineral Oils	Monthly	24-hr composite
Cadmium	Monthly	24-hr composite
Chromium	Monthly	24-hr composite
Silver	Monthly	24-hr composite
Nickel	Monthly	24-hr composite
Copper	Monthly	24-hr composite
Tin	Monthly	24-hr composite

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of trade effluent/per kg of BOD (delete as appropriate)	Charges per cubic metre based on Mogden + Capital Charges, the Mogden Formula and Capital Charge rates are supplied to licensee on a yearly basis
Payment Frequency	Quarterly
Total Annual Monitoring Costs (SE-1, SE-2 and SE-3)	€5,832

Signed on behalf of Central Laboratory: _____

Imelda Averill,
Senior Executive Scientific Officer.
06/02/06

Denis Morrissey,
Senior Scientific Officer.
06/02/06

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SANITARY AUTHORITY RESPONSE

Name of Sanitary Authority : Fingal County Council

Address

P.O.Box 174
Fingal County Hall
Swords
County Dublin

Name of Facility :

SR Technics
MD 198
Facilities Building
Dublin Airport

Consent granted subject to the consent conditions outlined below

Yes

CENTRAL LABORATORY CONSENT CONDITIONS

IPC Register Number: 766 SE-2

GENERAL CONSENT CONDITIONS SE-1, SE-2 and SE-3.	Condition to be included (Yes/No)
1. No specified emission to sewer shall exceed the emission limit value set out in Schedule B : <i>Emission Limits to Sewer</i> . There shall be no other emission to sewer of environmental significance.	Yes
2. The Licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out in <i>Schedule C</i> .	Yes
3. Monitoring and analyses equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge.	Yes
4. The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus installed in connection with the trade effluent and to take samples of the process effluent.	Yes
5. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activities are being carried out unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternate sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.	Yes
6. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.	Yes
7. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and off-site points as required by the Agency.	Yes
8. No substance shall be present in such concentrations as would constitute a danger to sewer maintenance personnel working in the sewerage system or would be injurious to the construction of sewer or would interfere with the operations of a downstream wastewater treatment works.	Yes

9. No substance shall be discharged in a manner, or at a concentration which after initial dilution in the receiving waters to which the Sanitary Authority sewage is discharged , causes tainting of fish or shellfish.	Yes
10. No emission to sewer shall take place which gives rise to any reaction within the sewer or to the liberation of by-products which may be of environmental significance.	Yes
11. The licensee shall ensure that the effluent shall not contain petroleum hydrocarbons or organic solvents (including chlorinated organic solvents) which would give rise to flammable or explosive vapours in the sewer.	Yes
12. A summary report of the results of analysis of effluent discharged to the sewer shall be forwarded to the sanitary authority on an annual basis.	Yes
13. Non-trade effluent wastewater (e.g. firewater, accidental spillages) which occurs on site shall not be discharged to the sewer without the prior authorisation of Fingal County Council.	Yes
14. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid,alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer.	Yes

ADDITIONAL GENERAL CONSENT CONDITIONS (specify if required)	
15. A log detailing the usage of all cooling water and boiler water treatment chemicals shall be kept by the licensee and submitted to Fingal County Council on an annual basis.	
16. The Licensee shall maintain, or have maintained the effluent treatment systems.	

Limit Values for Trade Effluent to Sewer

Schedule B - Emissions to Sewer

Emission point reference no: **SE-2**

Emission to (sewer description): **Opposite Hangar 4 at Pump House in Hangar 1
Car Park**

Grid Reference : **31697E, 24359N**

Volume to be emitted: Maximum in any one day : **140.0** m³
Maximum rate per hour : _____ m³

Parameter (delete parameters which are not applicable)	Emission	Limit Value		Parameter to be limited (Yes/No)
	Grab	Daily Mean	Daily Mean	
	Sample (mg/l)	Concentration (mg/l)	Loading (kg/day)	
BOD	1,200	1,000	140	Yes
COD	2,400	2,000	280	Yes
Suspended Solids	1,000	800	112	Yes
Sulphates (as SO ₄)	500	500	70	Yes
Detergents	100	100	14	Yes
Fats, Oils, Grease	100	100	14	Yes
pH	6-10	6 - 10	-	Yes
Temperature	42 degrees C	42 degrees C		Yes

ADDITIONAL PARAMETERS

Phosphates (as PO ₄ -P)	50	50	7.0	Yes
Mineral Oils	10	10	1.4	Yes

Frequency of Monitoring Trade Effluent to Sewer

Schedule C - Monitoring of Emissions to Sewer

Emission point reference no: SE-2

Parameter	Monitoring Frequency	Sampling Method/Type (grab, continuous)
Flow to sewer		
BOD	Monthly	24-hr Composite
COD	Monthly	24-hr Composite
Suspended Solids	Monthly	24-hr Composite
Sulphates (as SO ₄)	Monthly	24-hr Composite
Detergents	Monthly	24-hr Composite
Fats, Oils, Grease	Monthly	24-hr Composite
Temperature	Continuous	Continuous
pH	Continuous	Continuous

ADDITIONAL PARAMETERS

(if required)

Phosphates (as PO ₄ -P)	Monthly	24-hr composite
Mineral Oils	Monthly	24-hr composite
Cadmium	Monthly	24-hr composite
Lead	Monthly	24-hr composite
Copper	Monthly	24-hr composite
Zinc	Monthly	24-hr composite

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of trade effluent/per kg of BOD (delete as appropriate)	Charges per cubic metre based on Mogden + Capital Charges, the Mogden Formula and Capital Charge rates are supplied to licensee on a yearly basis
Payment Frequency	Quarterly
Total Annual Monitoring Costs (SE-1, SE-2 and SE-3)	€5,832

Signed on behalf of Central Laboratory: _____

Imelda Averill,
Senior Executive Scientific Officer.
06/02/06

Denis Morrissey,
Senior Scientific Officer.
06/02/06

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SANITARY AUTHORITY RESPONSE

Name of Sanitary Authority : Fingal County Council

Address : P.O.Box 174
Fingal County Hall
Swords
County Dublin

Name of Facility : SR Technics
MD 198
Facilities Building
Dublin Airport

Consent granted subject to the consent conditions outlined below	Yes
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CENTRAL LABORATORY CONSENT CONDITIONS

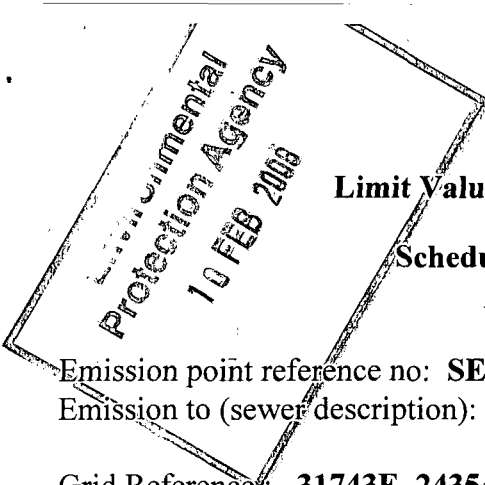
IPC Register Number: 766 SE-3

GENERAL CONSENT CONDITIONS SE-1, SE-2 and SE-3.	Condition to be included (Yes/No)
1. No specified emission to sewer shall exceed the emission limit value set out in Schedule B : <i>Emission Limits to Sewer</i> . There shall be no other emission to sewer of environmental significance.	Yes
2. The Licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out in <i>Schedule C</i> .	Yes
3. Monitoring and analyses equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge.	Yes
4. The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus installed in connection with the trade effluent and to take samples of the process effluent.	Yes
5. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activities are being carried out unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternate sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.	Yes
6. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.	Yes
7. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and off-site points as required by the Agency.	Yes
8. No substance shall be present in such concentrations as would constitute a danger to sewer maintenance personnel working in the sewerage system or would be injurious to the construction of sewer or would interfere with the operations of a downstream wastewater treatment works.	Yes

9. No substance shall be discharged in a manner, or at a concentration which after initial dilution in the receiving waters to which the Sanitary Authority sewage is discharged , causes tainting of fish or shellfish.	Yes
10. No emission to sewer shall take place which gives rise to any reaction within the sewer or to the liberation of by-products which may be of environmental significance.	Yes
11. The licensee shall ensure that the effluent shall not contain petroleum hydrocarbons or organic solvents (including chlorinated organic solvents) which would give rise to flammable or explosive vapours in the sewer.	Yes
12. A summary report of the results of analysis of effluent discharged to the sewer shall be forwarded to the sanitary authority on an annual basis.	Yes
13. Non-trade effluent wastewater (e.g. firewater, accidental spillages) which occurs on site shall not be discharged to the sewer without the prior authorisation of Fingal County Council.	Yes
14. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid, alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer.	Yes

ADDITIONAL GENERAL CONSENT CONDITIONS (specify if required)	
15. A log detailing the usage of all cooling water and boiler water treatment chemicals shall be kept by the licensee and submitted to Fingal County Council on an annual basis.	
16. The Licensee shall maintain, or have maintained the effluent treatment systems.	

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Limit Values for Trade Effluent to Sewer

Schedule B - Emissions to Sewer

Emission point reference no: **SE-3**

Emission to (sewer description): **Opposite Reception in Hangar 6, at Fence**

Grid Reference: **31743E, 24354N**

Volume to be emitted: Maximum in any one day : 200.0 m³
Maximum rate per hour : _____ m³

Parameter (delete parameters which are not applicable)	Emission		Limit Value	Parameter to be limited (Yes/No)
	Grab	Daily Mean	Daily Mean	
	Sample (mg/l)	Concentration (mg/l)	Loading (kg/day)	
BOD	1,200	1,000	200	Yes
COD	2,400	2,000	400	Yes
Suspended Solids	1,000	800	160	Yes
Sulphates (as SO ₄)	500	500	100	Yes
Detergents	100	100	20	Yes
Fats, Oils, Grease	100	100	20	Yes
pH	6 - 10	6 - 10	-	Yes
Temperature	42 degrees C	42 degrees C		Yes

ADDITIONAL PARAMETERS

Phosphates (as PO ₄ -P)	50	50	10	Yes
Mineral Oils	10	10	2	Yes

Frequency of Monitoring Trade Effluent to Sewer

Schedule C - Monitoring of Emissions to Sewer

Emission point reference no: SE-3

Parameter	Monitoring Frequency	Sampling Method/Type (grab, continuous)
Flow to sewer		
BOD	Monthly	24-hr Composite
COD	Monthly	24-hr Composite
Suspended Solids	Monthly	24-hr Composite
Sulphates (as SO ₄)	Monthly	24-hr Composite
Detergents	Monthly	24-hr Composite
Fats, Oils, Grease	Monthly	24-hr Composite
Temperature	Continuous	Continuous
pH	Continuous	Continuous

ADDITIONAL PARAMETERS

(if required)

Phosphates (as PO ₄ -P)	Monthly	24-hr composite
Mineral Oils	Monthly	24-hr composite
Cadmium	Monthly	24-hr composite
Copper	Monthly	24-hr composite
Zinc	Monthly	24-hr composite

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of trade effluent/per kg of BOD (delete as appropriate)	Charges per cubic metre based on Mogden + Capital Charges, the Mogden Formula and Capital Charge rates are supplied to licensee on a yearly basis
Payment Frequency	Quarterly
Total Annual Monitoring Costs (SE-1, SE-2 and SE-3)	€5,832

Signed on behalf of Central Laboratory: _____

Imelda Averill,
Senior Executive Scientific Officer.
06/02/06

Denis Morrissey,
Senior Scientific Officer.
06/02/06

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