Sub No. (1)

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

HSE South,
ENVIRONMENTAL HEALTH DEPARTMENT

11 Patrick Street,
Kilkenny,
Ireland.

Telephone 056 7784742
Fax 056 7762741

St. Dympna's Hospital,
Athy Road,
Carlow,
Ireland.

Telephone 059 9136574
Fax 059 9136508

23/4/2013

Ms Susan Wylde
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
Headquarters, PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Re: IPPC Licence – Richard Keenan & Company Ltd. P- 0555-01
Application for technical amendment to licence.
Applicant: Richard Keenan & Company Ltd, Clonagoose, Borris, Co. Carlow

Dear Ms. Wylde,
I refer to the above application for technical amendment to the licence.
A desk study of the application has been carried out by this department.
I would also refer to my site visit to the manufacturing plant and meeting thereon with Mr Roderick Jones on 10/4/2013. On the site visit, a lot of information and data, not submitted with this application, was made available to me.

Nature of proposal
Amendment of 2 items on the current IPPC licence

(1) The addition of Class 3.9 – Boiler making & the manufacture of reservoirs, tanks & other sheet metal containers where the production area exceeds 500 sq metres, to the existing licence.
(2) Relocation of emission points AE3 and AE4. The site was upgraded to include a new purpose built spray booth in plant 2. Four emission points have been made redundant, greatly reducing overall emissions.

Site Location
The facility is located just outside the town of Borris. Two watercourses join at the site. One is to the South of the site and is joined by the other, which crosses the site from a northerly direction in a concrete 900mm diameter culvert. The resulting watercourse is joined by the Black or Dinin river & flows south towards Borris where it flows into the Mountain river which in turn flows southwest to meet the River Barrow. A cattle mart and a riding school are located on either side of the facility.

On site operations/Process
A summary of the manufacturing process at the site in Borris, Co. Carlow is as follows:
- Metal cutting & shaping;
- Welding;
- Cleaning & degreasing;
- Undercoat painting;
- Overcoat painting;
- Drying

Main Raw Materials
The main raw materials used on site include the following:
- Solvent and water based paints;
- Solvent thinners used for diluting paints;
- Metal sheets;
- Small metal parts;
- Diesel.

Legislation & Guidance
Council Directive 1999/13/EC
The processes carried out fall within the scope of EU Council Directive 1999/13/EC on the limitation of emission of volatile organic solvents in certain activities and installations. The use of solvents on the site falls under category as described in annex 1 of the directive as; "coating activity" – any activity in which a single or multiple application of a continuous film of coating is applied to metallic and plastic surfaces including surfaces of airplanes, ships, trains etc.

Richard Keenan & Company is currently licensed under class 12.2 of the EPA Act 1992 " the use of coating materials in processes with a capacity to use at least 10 tonnes per year of organic solvents".
This technical amendment application seeks to add Class 3.9 – Boiler making and manufacture of reservoirs, tanks and other sheet metal containers where the production area exceeds 500 sq metres to the licence.

In assessing and evaluating this application, regard is had for the content and the provisions of the EPA – BAT Guidance Note on Best Available Techniques for solvent use in coating, cleaning and degreasing.
The Guidance Note is one of a series issued by the EPA which provides guidance on the determination of best available techniques (BAT) in relation to applicants seeking IPPC licences under part IV of the EPA Act 1992-2003 and is intended for use as a tool in determining BAT for the activities specified in this licence application.

Aqueous discharges
The application states that all wash water from the wash area is trapped and 100% recycled through a filter system. All was water from the power was area PW1 is collected and treated before discharge.
Therefore wash waters are not considered to pose any likely adverse impact on the surrounding environment.

Emissions
The main emissions from the manufacturing of sheet metal equipment and coating of same at this facility are emissions to air from the spraying with organic solvents, Dust and fumes from the welding activities and VOC and particulate emissions from the spraying/drying activities are of concern.

Air
During the site visit, the emission to atmosphere report for the 1st quarter of 2013 was viewed. This report provides the results of periodic monitoring of particulates and total organic compounds at 6 emission points (as required by the licence). The results indicate that emissions to air are within the limits of the licence. Some exceedances of current licence limits did occur in periods of peak production at the plant (2011, 2012). These were not considered to have any significant impact on the local environment. This office has not been in receipt of any odour or air emission complaints from this facility.

Noise
Richard Keenan & Company are required as part of the current IPPC licence to carry out a noise survey on an annual basis. The annual noise report for 2011 and 2012 was viewed on site visit. Three monitoring points were assessed, all strategically positioned at nose sensitive locations in close proximity to the installation. All operations continued as normal during each of the monitoring periods. Results indicate compliance with licence conditions. Noisy activities take place within the facility buildings insofar as possible. This office has not been in receipt of any noise complaints for the facility.

Groundwater
There has not been any groundwater or soil contamination on site historically. A condition of licence P-0555-01 required the licensee to undertake a hydro geological investigation of the site. Results of the groundwater investigation undertaken in 2006 do not indicate any significant deterioration in water quality, with respect to potential contaminants associated with activities on site. A number of bunded areas exist within the site with bund integrity testing carried out every 3 years. The application states that there are no process waters discharged to ground that could contaminate groundwater or soil. There has never been a major spill or leakage of a hazardous material that would render the site with contaminated soil or groundwater. Bulk chemicals and hazardous materials on site are all stored in bunds.

Surface waters
There is no waste water from the site from plant 1 or plant 2. The washing process was upgraded with pre-treatment phosphate wash in which 100% of the water used is recycled. There is no water discharged from this process.
Water from the power washing area is collected and treated before discharge. A documented daily visual inspection report of surface monitoring points is carried out on site. Surface water runoff will not be impacted by the application for the technical amendment and therefore should have minimal impact on surface water quality off site.

Foul water system
It is not considered that this application will have a significant impact on wastewater at the site. The existing on site treatment system located on the South West edge of the site was viewed on the site visit. This system has been upgraded in recent years and is considered adequate to deal with the needs of the site, at present. The application states that this system of aeration and filter beds meets the EPA guidelines specified in the relevant Wastewater Treatment manuals. Monitoring of wastewater is carried out quarterly by Independent Analysis Supplies, Bagenalstown, Carlow. Results are generally within the limits of the licence, with the exception of a high BOD result in 2012 due to a fault in the system which has since been rectified.

Waste
Hazardous waste arising on site consists mainly of waste thinners and solvent which are collected and stored in bunded areas until sufficient volumes are available for collection by permitted contractor. All recyclable wastes are collected in appropriate skips which are collected by approved contractors and recycled off site.

Emergency Response/Spills
A documented Environmental Accident Prevention Procedure presents standards and requirements to minimise environmental damage by outlining potential accidents and incidents that could have an environmental impact and how they can be prevented. Spill response kits, located in the main stores were observed on the site visit. This application states that there has never been a major spill or leakage.

Fire
At present, some of the surface water run-off is being contained on site for use in the event of a fire. The current system allows for this water to be pumped into a concrete delivery area. No information on the likely contaminates in the firefighting water or the products of combustion into the air could not be found in the application. It is recommended that procedures be put in place to minimise the likely environmental impact of such an event. A system of notification of such an event to the EPA should also be considered.

Complaints Procedure
There is no existing complaints procedure for dealing with environmental complaints. It is recommended that a documented Environmental Complaints Procedure be provided.

Closure Restoration and Aftercare Management Plan
As required by the licence, it is recommended that the applicant submit details of their Closure, Restoration and Aftercare Management Plan.

Observations / Recommendations

From on- site observations, inspection and discussions with the licensee, I am satisfied that the on site facilities, operation and management conform to a high standard of practice. Notwithstanding same, the facility does give rise to listed environmental emissions and has the potential to cause nuisance and give rise to complaint, particularly during peak production periods and during the phase of operation when hazardous waste is removed from site.

It is acknowledged that the licensing process comprehensively addresses in a holistic manner, the prevention, control and monitoring of generated emissions through the Recommended Determination (RD). This office is concerned primarily with highlighting issues of public health/ environmental health concern, where it is of the opinion that the licence application does not adequately address such concerns. In this regard, a number of issues are identified as being worthy of further clarification so that potential public/environmental health inputs are properly controlled/eliminated. These are set out hereunder:

1. A system of compliance monitoring for potential environmental emissions should be incorporated into any proposed licence determination. An onus should be placed on the applicant to undertake periodic monitoring with regard to air emissions and noise at selected locations on site boundaries and at sensitive receptors (nearest dwelling, cattle mart and riding school).The results of such monitoring should be recorded/ documented. No emissions, including air and noise, from the activities carried out at the site should result in impairment of, or interference with amenities or the environment beyond the boundary.
2. Although, "spill response" is dealt with in the Environmental Accident Procedure section of the application, it is recommended that the applicant be requested to submit details of control measures to demonstrate how accidental spillage of hazardous waste would be contained within the facility arising from an unexpected event.
3. It is recommended that the applicant be required to submit details of the Closure, Restoration and Aftercare Management Plan as part of this application.
4. It is recommended that the applicant be required to draw up an Environmental Complaints Procedure

Yours sincerely

Tracey Morris

Tracey Morris
Environmental Health Officer

Agreed

R. McGrath

Richard McGrath
A/ Principal Environmental Health Officer