



Headquarters,  
Johnstown Castle Estate  
County Wexford, Ireland

## INTEGRATED POLLUTION CONTROL LICENCE

<b>Licence Register Number:</b>	350
<b>Licensee:</b>	Waterford Joinery Limited
<b>Location of Activity:</b>	Ballinamuck, Dungarvan, County Waterford.

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## Glossary of Terms

AER	Annual Environmental Report.
Annually	All or part of a period of twelve consecutive months.
BATNEEC	Best Available Technology Not Entailing Excessive Cost.
Daily	During all days of plant operation, and in the case of emissions, when emissions are taking place; with no more than 1 measurement on any one day.
Day	Any 24 hour period.
Daytime	0800 hrs to 2200 hrs.
dB(A)	Decibels (A weighted).
EMP	Environmental Management Programme.
EWC	European Waste Catalogue (94/3/EEC, see also Agency Guidance Note on the EWC)
IPC	Integrated Pollution Control.
Leq	Equivalent continuous sound level.
Local Authority	Waterford County Council.
Monthly	At least 12 times per year at approximately monthly intervals.
Night-time	2200 hrs to 0800 hrs.
Noise sensitive location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Standard Methods	As detailed in "Standard Methods for the Examination of Water and Wastewater", (prepared and published jointly by A.P.H.A., A.W.W.A & W.E.F) 19th Ed. 1995, American Public Health Association, 1015 Fifteenth Street, N.W., Washington DC 20005, USA.
The Agency	Environmental Protection Agency.
The Licensee	Waterford Joinery Limited, Ballinamuck, Dungarvan, County Waterford.
Weekly	During all weeks of plant operation, and in the case of emissions, when emissions are taking place; with no more than one measurement in any one week.

## ***Reason for the Decision***

The Agency is satisfied, on the basis of the information available, that, subject to compliance with the conditions of this licence, any emissions from the activity will comply with and not contravene any of the requirements of Section 83(3) of the Environmental Protection Agency Act, 1992.

In particular, the Agency has noted and given consideration to the following:

1. Submission from the Department of Marine and Natural Resources
2. Objection received from the applicant.

In reaching this decision the Agency has considered the application and supporting documentation received from the applicant, all submissions and objections received and the report of its inspectors.

# Activities Licensed

In pursuance of the powers conferred on it by the Environmental Protection Agency Act, 1992, the Agency hereby grants this Integrated Pollution Control licence to:

Waterford Joinery Limited, Ballinamuck, Dungarvan, County Waterford

under Section 83(1) of the said Act to carry on the following activity

:- the treatment or protection of wood, involving the use of preservatives, with a capacity exceeding 10 tonnes per day

at Ballinamuck, Dungarvan, County Waterford

subject to the following conditions (12) with the reasons therefor and associated schedules attached thereto.

## Conditions

### Condition 1 Scope

- 1.1 The activity shall be controlled, operated, and maintained and emissions shall take place as set out in this Integrated Pollution Control (IPC) licence. All programmes required to be carried out under the terms of this licence, become part of this licence.
- 1.2 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in a material change or increase in:
  - 1.2.1 The nature or quantity of any emission,
  - 1.2.2 The abatement/treatment or recovery systems,
  - 1.2.3 The range of processes to be carried out,
  - 1.2.4 The fuels, raw materials, intermediates, products or wastes generated,or any changes in:
  - 1.2.5 The site management and control with adverse environmental significanceshall be carried out or commenced without prior notice to, and without the prior written agreement of, the Agency.
- 1.3 This licence is for the purposes of IPC licensing under the EPA Act 1992 only and nothing in this licence shall be construed as negating the licensee's statutory obligations or requirements under any other enactments or regulations.
- 1.4 Any reference in this licence to 'site' shall mean the plan area edged in black and shown in the map labelled "No. 1" in the IPC licence application.

*Reason: To clarify the scope of this licence.*

## Condition 2 Management of the Activity

- 2.1 The licensee shall establish and maintain an Environmental Management System (EMS) which shall fulfil the requirements of this licence. The EMS shall assess all operations and review all practicable options for the use of cleaner technology, cleaner production and the reduction and minimisation of waste, and shall include as a minimum those elements specified in the Conditions 2.2 to 2.7 below:
- 2.2 Environmental Management Programme (EMP)
- 2.2.1 The licensee shall, not later than six months from the date of grant of this licence, establish and maintain an EMP, including a time schedule, for achieving objectives and targets. The EMP shall thereafter, form part of the AER and shall be agreed with the Agency prior to implementation. It shall include:
- (i) designation of responsibility for targets;
  - (ii) the means by which they may be achieved;
  - (iii) the time within which they may be achieved.
- 2.2.2 The EMP shall as a minimum include the following objectives:
- (i) Use of more eco-friendly preservatives.
  - (ii) Recovery/recycling of production waste.
  - (iii) Effective bunding.
- 2.2.3 A report on the programme, including the success in meeting agreed targets, shall be prepared and submitted to the Agency as part of the AER. Such reports shall be retained on-site for a period of not less than seven years and shall be available for inspection by authorised persons of the Agency.
- 2.3 Documentation
- 2.3.1 The licensee shall establish and maintain an environmental management documentation system which shall be to the satisfaction of the Agency.
- 2.3.2 The licensee shall issue a copy of this licence to all relevant personnel whose duties relate to any condition of this licence.
- 2.4 Corrective Action
- 2.4.1 The licensee shall establish procedures to ensure that corrective action is taken should the specified requirements of this licence not be fulfilled. The responsibility and authority for initiating further investigation and corrective action in the event of a reported non-conformity with this licence shall be defined.
- 2.5 Awareness and Training
- 2.5.1 The licensee shall establish and maintain procedures for identifying training needs, and for providing appropriate training, for all personnel whose work can have a significant effect upon the environment. Appropriate records of training shall be maintained.
- 2.5.2 Personnel performing specifically assigned tasks shall be qualified on the basis of appropriate education, training and/or experience, as required.

## 2.6 Responsibilities

2.6.1 The licensee shall ensure that a person in charge, as defined under the terms of the Environmental Protection Agency Act, 1992 shall be available on-site at all times when the activity is in operation. The person in charge shall also be available to meet with authorised persons of the Agency at all reasonable times.

## 2.7 Communications

2.7.1 The licensee shall put in place a programme to ensure that members of the public can obtain information concerning the environmental performance of the licensee at all reasonable times.

2.7.2 The licensee shall submit to the Agency, eighteen months from the date of grant of this licence, and each calendar year thereafter, an AER which shall be to the satisfaction of the Agency. This report shall include as a minimum the information specified in *Schedule 2(i) Recording and Reporting to the Agency* and shall be prepared in accordance with any relevant guidelines issued by the Agency.

*Reason: To make provision for management of the activity on a planned basis having regard to the desirability of ongoing assessment, recording and reporting of matters affecting the environment.*

## Condition 3 Interpretation

### 3.1 Noise

3.1.1 Noise from the activity shall not give rise to sound pressure levels (Leq, 15 minutes) measured at noise sensitive locations which exceed the limit value(s) by more than 2 dB(A).

*Reason : To clarify the interpretation of emission limit values fixed under the licence.*

## Condition 4 Notification

4.1 The licensee shall notify the Agency by both telephone and facsimile, if available, to the Agency's Headquarters in Wexford, or to such other Agency office as may be specified by the Agency, as soon as practicable after the occurrence of any of the following:

4.1.1 Any release to atmosphere from any potential emission point.

4.1.2 Any emission which does not comply with the requirements of this licence.

4.1.3 Any incident with the potential for environmental contamination of surface water or groundwater, or posing an environmental threat to air or land, or requiring an emergency response by the Local Authority.

The licensee shall include as part of the notification, date and time of the incident, details of the occurrence, and the steps taken to minimise the emissions and avoid recurrence.

4.2 The licensee shall make a record of any incident as set out in Condition 4.1 above. The notification given to the Agency shall include details of the circumstances giving rise to the incident and all actions taken to minimise the effect on the environment and minimise wastes generated.

- 4.3 A summary report of reported incidents shall be submitted to the Agency as part of the AER. The information contained in this report shall be prepared in accordance with any relevant guidelines issued by the Agency.
- 4.4 In the case of any incident as set out in Condition 4.1.3 above which relates to discharges to water, the licensee shall notify the Southern Regional Fisheries Board as soon as practicable after such an incident.
- 4.5 In the event of any incident, as set out in Condition 4.1.3 having taken place, the licensee shall notify the Local Authority as soon as practicable, after such an incident.

*Reason : To provide for the notification of incidents and update information on the activity.*

## **Condition 5 Emissions to Atmosphere**

- 5.1 The licensee shall ensure that all operations on-site shall be carried out in a manner such that air emissions and/or odours do not result in significant impairment of, or significant interference with amenities or the environment beyond the site boundary.
- 5.2 The licensee shall, within three months from the date of grant of this licence, carry out an assessment to the satisfaction of the Agency, in order to ascertain whether the existing stack height offers adequate dispersion for the boiler emissions. The licensee shall, based on the findings of the assessment, implement any works required by the Agency, within a time-scale specified by the Agency.
- 5.3 The licensee shall submit an annual report on the combustion efficiency of the boiler as part of the AER.

*Reason: To provide for the protection of the environment by way of control, limitation, treatment and monitoring of emissions.*

## **Condition 6 Waste Management**

- 6.1 Disposal or recovery of waste shall take place only as specified in *Schedule 1(i) Wastes for Disposal/Recovery* of this licence and in accordance with the appropriate National and European legislation and protocols. No other waste shall be disposed of/recovered either on-site or off-site without prior notice to, and prior written agreement of, the Agency.
- 6.2 Waste sent off-site for recovery or disposal shall only be conveyed to a waste contractor, as agreed by the Agency, and only transported from the site of the activity to the site of recovery/disposal in a manner which will not adversely affect the environment.
- 6.3 The licensee shall commence segregating production waste from the date of grant of this licence and within six months of the date of grant of this licence shall cease dumping of production waste into the area described as "The Glen" in the IPC licence application.
- 6.4 The licensee shall, within twelve months of the date of grant of this licence, submit a proposal for the restoration of the landfill area.
- 6.5 The licensee shall, within three months of the date of grant of this licence, submit a proposal for approval to the Agency outlining their recycling and/or disposal options for all waste glue and glue contaminated water. Within one month of acceptance of these proposals the licensee shall seal off the exit pipe from the glue washings sump.



- 6.6 A full record, which shall be open to inspection by authorised persons of the Agency at all times, shall be kept by the licensee on matters relating to the waste management operations and practices at this site. This record shall as a minimum contain details of the following:
- 6.6.1 The names of the agent and transporter of the waste.
  - 6.6.2 The name of the persons responsible for the ultimate disposal/recovery of the waste.
  - 6.6.3 The ultimate destination of the waste.
  - 6.6.4 Written confirmation of the acceptance and disposal/recovery of any hazardous waste consignments sent off-site.
  - 6.6.5 The tonnages and EWC Code for the waste materials listed in *Schedule 1(i) Wastes for Disposal/Recovery* sent off-site for disposal/recovery.
  - 6.6.6 Details of any rejected consignments.

A copy of this Waste Management record shall be submitted to the Agency as part of the AER for the site.

*Reason: To provide for the disposal of waste and the protection of the environment.*

## Condition 7 Noise

- 7.1 Activities on-site shall not give rise to noise levels off site at any noise sensitive location which exceed the following sound pressure limits (Leq, 15 minutes) subject to Condition 3 of this licence:
- 7.1.1 Daytime: 55 dB(A)
  - 7.1.2 Night-time: 45 dB(A).
- 7.2 There shall be no clearly audible tonal component or impulsive component in the noise emissions from the activity at any noise sensitive location.

*Reason: To provide for the protection of the environment by control of noise.*

## Condition 8 Non-Process Water

- 8.1 Surface water
- 8.1.1 No potentially polluting substance or matter shall be permitted to discharge to off-site surface waters or off site storm drains.
  - 8.1.2 In the event that any analyses or observations made on the quality or appearance of surface water runoff should indicate that contamination has taken place, the licensee shall:
    - (i) carry out an immediate investigation to identify and isolate the source of the contamination,

(ii) put in place measures to prevent further contamination and to minimise the effects of any contamination on the environment,

(iii) and notify the Agency as soon as is practicable.

## 8.2 Firewater Retention.

8.2.1 The licensee shall carry out a risk assessment to determine if the activity should have a fire-water retention facility. The licensee shall submit to the Agency the assessment together with a report on the findings and recommendations of the assessment within six months from the date of grant of this licence.

8.2.2 In the event that a significant risk exists for the release of contaminated fire-water, the licensee shall, based on the findings of the risk assessment, prepare and implement, with the agreement of the Agency, a suitable risk management programme. The risk management programme shall be fully implemented within six months from date of notification by the Agency.

8.2.3 The licensee shall have regard to the Environmental Protection Agency Draft Guidance Note to Industry on the Requirements for Fire-Water Retention Facilities when implementing Conditions 8.2.1 and 8.2.2 above.

## 8.3 Facilities for the Protection of Groundwater and Surface Water

8.3.1 All tank and drum storage areas shall be rendered impervious to the materials stored therein. In addition, tank and drum storage areas shall, as a minimum be bunded, 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 bunded area

(ii) 25% of the total volume of substance which could be stored within the bunded area.

Drainage from bunded areas shall be diverted for collection and safe disposal.

8.3.2 The integrity and water tightness of all the bunding structures and their resistance to penetration by water or other materials stored therein shall be tested and demonstrated by the licensee to the satisfaction of the Agency and shall be reported to the Agency within six months from the date of grant of this licence and every two years thereafter. A report on such tests shall be included in the AER.

8.3.3 The loading and unloading of materials shall be carried out in designated areas protected against spillage and leachate run-off. While awaiting disposal, all materials shall be collected and stored in designated areas protected against spillage and leachate run-off.

8.3.4 Within nine months of date of grant of this licence all preservative storage and mixing tanks shall be fitted with an overflow alarm mechanism.

8.3.5 The licensee shall have in storage an adequate supply of containment booms and/or suitable absorbent material to contain and absorb any spillage.

8.3.6 The drain located in the hardstanding area for unloading of preservative material shall be plugged at all times, except to allow for the drainage of uncontaminated rainwater.

8.3.7 The septic tanks shall be inspected every six months and de-sludged at least annually. Records of these inspections and de-sludging shall be maintained

by the licensee and be available for inspection by the Agency at all reasonable times.

- 8.3.8 The licensee shall within nine months of date of grant of this licence, submit a proposal to the Agency for the extraction of sawdust from all production areas of the site to one or a number of centralised, enclosed areas. Any recommendations arising from this proposal shall be implemented within such a period as to be agreed with the Agency.

*Reason: To provide for the protection of surface waters and groundwater.*

## Condition 9 Monitoring

- 9.1 The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as may be required by the Agency from time to time.
- 9.2 The frequency, methods and scope of monitoring, sampling and analyses, as set out in this licence, may be amended with the written agreement of the Agency following evaluation of test results.
- 9.3 The licensee shall install on all emission points such sampling points or equipment, including any data-logging or other electronic communication equipment, as may be required by the Agency. All such equipment shall be consistent with the safe operation of all sampling and monitoring systems.
- 9.4 The licensee shall provide safe and permanent access to the following sampling and monitoring points:
- Waste storage areas on-site.
  - Raw materials storage areas.
- and safe access to any other sampling and monitoring points required by the Agency.

*Reason: To ensure compliance with the requirements of other conditions of this licence by provision of a satisfactory system of measurement and monitoring of emissions.*

## Condition 10 Recording and Reporting to Agency

- 10.1 The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.
- 10.2 The licensee shall record all incidents which affect the normal operation of the activity and which may create an environmental risk.
- 10.3 The licensee shall record all complaints of an environmental nature related to the operation of the activity. Each such record shall give details of the date and time of the complaint, the name of the complainant and give details of the nature of the complaint. A record shall also be kept of the response made in the case of each complaint. The licensee shall submit a report to the Agency, during the month following such complaints, giving details of any complaints which arise. A summary of the number and nature of complaints received shall be included in the AER.
- 10.4 The format of all records required by this licence shall be to the satisfaction of the Agency. Records shall be retained on-site for a period of not less than seven years and shall be available for inspection by the Agency at all reasonable times.

- 10.5 Reports of all recording, sampling, analyses, measurements, examinations, calibrations and maintenance as set out in *Schedule 2(i) Recording and Reporting to the Agency*, shall be submitted to the Agency Headquarters as specified in this licence. The format of these reports shall be to the satisfaction of the Agency. One original and three copies shall be submitted as and when specified.
- 10.6 Provision shall also be made for the transfer of environmental information, in relation to this licence, to the Agency's computer system, as may be requested by the Agency.
- 10.7 All reports shall be certified accurate and representative by the licensee's Plant Manager or other senior officer designated by the Plant Manager.
- 10.8 All written procedures controlling operations affecting this licence shall be available on-site for inspection by the Agency at all reasonable times.
- 10.9 The frequency and scope of reporting, as set out in this licence, may be amended with the written agreement of the Agency following evaluation of test results.

*Reason: To provide for the collection and reporting of adequate information on the activity.*

## Condition 11 Emergency Response

- 11.1 The licensee shall ensure that an Emergency Response Procedure is in place which shall address any emergency situation which may originate on-site. This Procedure shall include provision for minimising the effects of any emergency on the environment.

*Reason: To provide for the protection of the environment.*

## Condition 12 Financial Provisions

### 12.1 Agency Charges

- 12.1.1 The licensee shall pay to the Agency an annual contribution of £609 or such sum as the Agency from time to time determines, towards the cost of monitoring the activity as the Agency considers necessary for the performance of its functions under the Environmental Protection Agency Act, 1992. The licensee shall in 2000 and subsequent years, not later than January 31 of each year, pay to the Agency this amount updated in accordance with changes in the Consumer Price Index from the date of the licence to the renewal date. The updated amount shall be notified to the licensee by the Agency. For 1999, the licensee shall pay a pro rata amount from the date of this licence to December 31 1999. This amount shall be paid to the Agency within one month of the date of grant of this licence.

*Reason: To provide for adequate financing for monitoring and financial provisions for measures to protect the environment.*

### Schedule 1(i) Wastes for Disposal/Recovery

Waste Materials	Method of disposal/recovery <sup>Note 1</sup>
Trimmed door lippings, waste plywood, used sand belts, packaging	On-site landfill <sup>Note 2</sup>
Offcuts of untreated timber	Collected by employees/subsidiary company for home heating
Sawdust	Collected by farmers for animal bedding.
Office/general waste	Agreed waste disposal contractor.
Septic tank sludge	Agreed waste disposal contractor.
Empty chemicals containers	Return to supplier or Agreed hazardous waste disposal contractor.
Contaminated clothing	Agreed hazardous waste disposal contractor.
Sludges from treatment tank	Agreed hazardous waste disposal contractor.
Offcuts of or damaged preserved timber	Agreed hazardous waste disposal contractor.
Contaminated rainwater	Agreed hazardous waste disposal contractor.
Contaminated absorbent material	Agreed hazardous waste disposal contractor.
Waste oils	Agreed hazardous waste disposal contractor.
Other <sup>Note 3</sup>	

- Note 1: Any variation from those contractors named in the IPC Licence application, or subsequent agreements, must have the prior written agreement of the Agency.
- Note 2: The licensee shall commence segregation of production waste (see Condition 6.3) from date of grant of this licence.
- Note 3: No other waste shall be disposed of/recovered off-site or on-site without prior notice to, and prior written agreement of the Agency.

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### Schedule 2(i) Recording and Reporting to the Agency

Completed reports shall be submitted to:

The Environmental Protection Agency  
 Headquarters  
 P.O. Box 3000  
 Johnstown Castle Estate  
 County Wexford.

or Any other address as may be specified by the Agency

Reports are required to be forwarded as set out below:

#### Recurring Reports:

Report	Reporting Frequency	Report Submission Date
Complaints (where these arise)	Monthly	Ten days after end of the month being reported on.
Annual Environmental Report (AER)	Annually	Eighteen months from the date of grant of licence and each year thereafter.

Annual Environmental Report Content	
<ul style="list-style-type: none"> <li>Waste management report.</li> <li>Resource consumption summary.</li> <li>Complaints summary.</li> <li>Reported incidents summary</li> </ul>	<ul style="list-style-type: none"> <li>Bund integrity assessment (see Condition 8.3.2).</li> <li>Combustion efficiency of Wanson Boiler.</li> <li>Environmental management programme - proposal</li> <li>Environmental management programme - report</li> </ul>

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**Once-off Reports:**

Report	Report Submission Date
<b>Boiler stack height assessment</b>	Within three months of the date of grant of licence.
<b>Fire-water retention study.</b>	Within six months of the date of grant of licence.
<b>Bund integrity assessment.</b>	Within six months of the date of grant of licence.
<b>Proposal for the combined extraction of sawdust from all areas of the site.</b>	Within nine months of the date of grant of licence.
<b>Environmental management programme proposal.</b>	Six months from the date of grant of licence.
<b>Proposal for restoration of landfill area</b>	Within twelve months of the date of grant of licence
<b>Report on recycling/disposal options for glue and glue washings waste.</b>	Within three months of the date of grant of licence.

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Signed on behalf of the Agency

Liam McComiskey

Director/Authorised Person

Dated this 16<sup>th</sup> day of March 1999