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the Programme Manager F Clinton
Signed: N Kearey Date: 7/5/09



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LICENSING &
RESOURCE USE

**REPORT OF THE TECHNICAL COMMITTEE ON
OBJECTIONS TO LICENCE CONDITIONS**

TO: Director

FROM: Technical Committee - LICENSING UNIT

DATE: 25th March 2009

RE: Objection to Proposed Decision/Determination for
WATERFORD PLATING COMPANY LIMITED, IPC Reg: P0280-02

Application Details	
Class(s) of activity:	Class 12.3: The surface treatment of metals and plastic materials using an electrolytic or chemical process where the volume of the treatment vats exceeds 30m ³ .
Location of activity:	Northern Industrial Estate, Old Kilmeaden Road, Waterford
Licence application received:	13 th June 2008
PD issued:	26 th November 2008
First party objection received:	19 th December 2008
Third Party Objection received	None

Company

The application relates to Waterford Plating Company Limited, which was granted an IPPC licence (P0280-01) in 1998 to carry out activities at the Northern Industrial Estate, Old Kilmeadan Road, Waterford. The company operates a surface treatment facility. The company was formed in 1991 and currently employs 16 permanent employees. The normal operating hours of the installation are Monday to Friday 0800 to 1630. Surface treatment is conducted throughout the daytime working period.

The activities conducted at Waterford Plating Ltd associated with surface treatment of metals include:

- 1) Electro-plating coatings;
- 2) Non-electroplating coatings;
- 3) Painting of components.

This review was carried out as the licensee had requested a revision of their site boundary, as well as the relocation of the existing emission A2-2, the addition of a new point A2-3 and the relocation of the Emissions to Sewer monitoring reference point SE-1.

Consideration of the Objection

The Technical Committee, comprising of Gavin Clabby (Chair) and Marie O'Connor, has considered all of the issues raised in the Objection and this report details the Committee's comments and recommendations following the examination of the objection together with discussions with the inspector, Suzanne Wyld, who also provided comments on the points raised.

There were no objections in relation to the Discharge to Sewer.

First Party Objection

A.1. Part 1 Schedule of Activities

The proposed determination classifies the activity as "the surface treatment of metals and plastic materials using an electrolytic or chemical process where the volume of the treatment vats exceeds 30 m³." The licensee objects to this classification, stating that their total treatment vat capacity is 16.48 m³.

Technical Committee's Evaluation: The information attached to the objection shows that the total chemical volume in the vats is 16.48m³. This quantification appears correct under the European Commission guidance notes on Directive 96/61/EC, and could remove the activity from being a Class 12.3 of the First schedule of the EPA Act 1992 and 2003.

However, the licensee submitted the application under activity class 12.3 of this schedule and the installation currently operates with IPPC licence P0280-01 under activity class 12.3. If the applicant considers that the process falls outside this activity class, or any other class in the First schedule of the EPA Act 1992 and 2003, they should apply to the Agency to surrender their licence.

The Technical Committee considers that it cannot consider a change of activity class by this current process of technical review of objections to licence conditions.

Recommendation: No change.

A.2. Condition 6.16.1

The licensee objects to the requirement to carry out air dispersion modelling for TA Luft II and III compounds, based on the operation of both the wet spray booth (A2-1) and the wet/dry paint booth (A2-3) simultaneously. (Currently, only emission point A2-1 has been modelled for these compounds.) They state that the wet/dry booth now uses only non-solvent based paints.

Technical Committee's Evaluation: In the objection the licensee states that the function of the wet/dry spray booth (A2-3) had changed between the times of the licence review application and the air dispersion modelling. This booth is now mainly used for dry spraying with a small amount of wet spraying using non-solvent based paints.

Recommendation: For the purposes of clarity the condition should be amended to read as follows:

For emissions to atmosphere, which may contain organic solvents, through Emission Point A2-3 the licensee shall carry out air dispersion modelling based on the simultaneous operation of the wet/dry paint booth (A2-3) and the wet spray paint booth (A2-1). The licensee shall not make any such alterations without prior notice to, and without the agreement of, the Agency.

A.3. Condition 6.16.2

The licensee objects to the above condition, which requires written approval from the Agency, prior to using organic based paints in the wet/dry spray booth (A2-3)

Technical Committee's Evaluation: This condition only applies in the event of a change of use for the wet/dry spray booth to an organic solvent applicator. It does not affect the licensee otherwise.

Recommendation: No change.

A.3. Condition 3.12

The licensee objects to the requirement for a windsock, or other wind direction indicator, which shall be visible from the public roadway outside the site, on the grounds that it would entail unnecessary expense, having no influence on plant operations or any function in the protection of the environment.

Technical Committee's Evaluation: This is a standard condition in IPPC licenses. It is considered necessary as the installation has emissions, which may contain solvents and particulates. The windsock will provide information for members of the public, as well as neighbouring facilities, in the event of significant odours, noise or dust in the vicinity.

Recommendation: No change.

Overall Recommendation

It is recommended that the Board of the Agency grant a licence to the applicant

- (i) for the reasons outlined in the proposed determination and
 - (ii) subject to the conditions and reasons for same in the Proposed Determination,
- and
- (iii) subject to the amendments proposed in this report.

Signed

Gavin Clabby

for and on behalf of the Technical Committee.

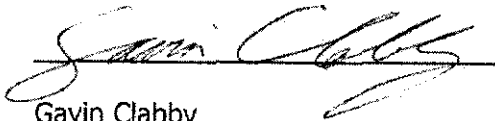
Recommendation: No change.

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