LICENCE REG No. P0280-02 HAS BEEN SURRENDERED.

Please note that licence Reg No. P0280-02 was surrendered on 07/02/2011.



Headquarters
P.O. Box 3000
Johnstown Castle Estate
County Wexford
Ireland

INTEGRATED POLLUTION PREVENTION & CONTROL LICENCE

Licence Register Number:	P0280-02
Licongoo	Waterford Plating Company
Licensee:	Limited
	Unit 605/606/655,
Location of Installation:	Northern Industrial Estate,
	Old Kilmeadan Road,
	Waterford.



ENVIRONMENTAL PROTECTION AGENCY ACTS, 1992 TO 2007

INTEGRATED POLLUTION PREVENTION AND CONTROL LICENCE

Decision of Agency, under Section 90(2) of the Environmental Protection Agency Acts, 1992 to 2007.

Reference number in Register of licences: P0280-02

Further to notice dated 26/11/2008 the Agency in exercise of the powers conferred on it by the Environmental Protection Agency Acts, 1992 to 2007, for the reasons hereinafter set out, hereby grants a revised IPPC licence to Waterford Plating Company Limited, Unit 605/606/655, Northern Industrial Estate, Old Kilmeadan Road, Waterford

to carry on the following activity

-: The surface treatment of metals and plastic materials using an electrolytic or chemical process where the volume of the treatment vats exceeds 30m³

at Unit 605/606/655, Northern Industrial Estate, Old Kilmeadan Road, Waterford subject to the conditions as set out.

GIVEN under the Seal of the Agency this 12th day of June, 2009

PRESENT when the seal of the Agency was affixed hereto:

Laura Burke

Director/Authorised Person



INTRODUCTION

This introduction is not part of the licence and does not purport to be a legal interpretation of the licence.

Waterford Plating Company Limited operates a surface treatment facility at the Northern Industrial Estate, Old Kilmeadan Road, Waterford. 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.

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

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

There are three emission points to air from the paint booths. Process effluent is treated in the on-site waste water treatment and then discharged to sewer. Storm water run-off is discharged to the River Suir.

The licence sets out in detail the conditions under which Waterford Plating Company Limited will operate and manage this installation.



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Glossary of Terms

All terms in this licence should be interpreted in accordance with the definitions in the Environmental Protection Agency Acts 1992 to 2007 / Waste Management Acts 1996 to 2008, unless otherwise defined in the section.

Adequate

20 lux measured at ground level.

lighting

AER

Annual Environmental Report.

Agreement

Agreement in writing.

Annually

All or part of a period of twelve consecutive months.

Application

The application by the licensee for this licence.

Appropriate Facility

A waste management facility, duly authorised under relevant law and

technically suitable.

Attachment

Any reference to Attachments in this licence refers to attachments

submitted as part of this licence application.

BAT

Best Available Techniques.

Biannually

At approximately six – monthly intervals.

Biennially

Once every two years.

BOD

5 day Biochemical Oxygen Demand.

CEN

Comité Européen De Normalisation - European Committee for

Standardisation.

COD

Chemical Oxygen Demand.

Containment

boom

A boom that can contain spillages and prevent them from entering drains or watercourses or from further contaminating watercourses.

Daily

During all days of plant operation and, in the case of emissions, when

emissions are taking place; with at least one measurement on any one

1

day.

Day

Any 24 hour period.

Daytime

0800 hrs to 2200 hrs.



dB(A) Decibels (A weighted).

DO Dissolved oxygen.

Documentation Any report, record, results, data, drawing, proposal, interpretation or

other document in written or electronic form which is required by this

licence.

Any reference to a drawing or drawing number means a drawing or **Drawing**

drawing number contained in the application, unless otherwise

specified in this licence.

EMP Environmental Management Programme.

Emission limits Those limits, including concentration limits and deposition rates,

established in Schedule B: Emission Limits of this licence.

A harmonised, non-exhaustive list of wastes drawn up by the

Environmental damage

As defined in Directive 2004/35/EC.

EPA Environmental Protection Agency.

European Waste Catalogue

European Commission and published as Commission Decision (EWC)

2000/532/EC and any subsequent amendment published in the Official

Journal of the European Community.

Any site or premises used for the purpose of the recovery of disposal **Facility**

of waste.

Fortnightly A minimum of 24 times per year, at approximately two week intervals.

GC/MS Gas chromatography/mass spectroscopy.

Hectare. ha

Heavy metals This term is to be interpreted as set out in "Parameters of Water

Quality, Interpretation and Standards" published by the Agency in

2001. ISBN 1-84095-015-3.

Hours of operation The hours during which the installation is authorised to be operational.

ICP Inductively coupled plasma spectroscopy. Incident

The following shall constitute as incident for the purposes of this licence:

- (i) an emergency;
- (ii) any emission which does not comply with the requirements of this licence:
- (iii) any trigger level specified in this licence which is attained or exceeded; and,
- (iv) any indication that environmental pollution has, or may have, taken place.

Installation

A stationary technical unit or plant where the activity concerned referred to in the First Schedule of EPA Acts 1992 to 2007 is or will be carried on, and shall be deemed to include any directly associated activity, which has a technical connection with the activity and is carried out on the site of the activity.

IPPC

Integrated Pollution Prevention & Control.

K

Kelvin.

kPa

Kilopascals.

 L_{ea}

Equivalent continuous sound level.

Licensee

Waterford Plating Company Limited, Unit 605/606/655, Northern Industrial Estate, Old Kilmeadan Road, Waterford.

List I

As listed in the EC Directives 76/464/EEC and 80/68/EEC and amendments.

List II

As listed in the EC Directives 76/464/EEC and 80/68/EEC and amendments.

Local Authority

Waterford City Council.

Maintain

Keep in a fit state, including such regular inspection, servicing, calibration and repair as may be necessary to perform its function adequately.

Mass flow limit

An emission limit value expressed as the maximum mass of a substance that can be emitted per unit time.

Mass flow threshold

A mass flow rate above which a concentration limit applies.

Monthly

A minimum of 12 times per year, at intervals of approximately one month.

Night-time

2200 hrs to 0800 hrs.



Noise-sensitive Any dwelling house, hotel or hostel, health building, educational location (NSL) establishment, place of worship or entertainment, or any other

installation or area of high amenity, which for its proper enjoyment

requires the absence of noise at nuisance levels.

PRTR Pollutant Release and Transfer Register.

Quarterly At approximately three – monthly intervals.

All or part of a period of three consecutive months beginning on the

first day of January, April, July or October.

Regional Fisheries Board Southern Regional Fisheries Board.

Sample(s) Unless the context of this licence indicates to the contrary, the term

samples shall include measurements taken by electronic instruments.

Sanitary effluent Wastewater from installation toilet, washroom and canteen facilities.

SOP Standard operating procedure.

Specified emissions

Those emissions listed in Schedule B: Emission Limits of this licence.

Standard method

A National, European or internationally recognised procedure (e.g. I.S. EN, ISO, CEN, BS or equivalent); or an in-house documented procedure based on the above references; a procedure as detailed in the current edition of "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.), American Public Health Association, 1015 Fifteenth Street, N.W., Washington DC 20005, USA; or an alternative method as may be agreed by the Agency.

Storm water Rain water run-off from roof and non-process areas.

The Agency Environmental Protection Agency.

TA Luft Technical Instructions on Air Quality Control – TA Luft in accordance

with art. 48 of the Federal Immission Control Law (BImSchG) dated 15 March 1974 (BGBI. I p 721). Federal Ministry for Environment, Bonn 1986, including the amendment for Classification of Organic Substances according to section 3.1.7 TA. Luft, published in July

1997.

TOC Total organic carbon.

Trade effluent Trade effluent has the meaning given in the Water Services Act, 2007.

Trigger level A parameter value, the achievement or exceedance of which requires

certain actions to be taken by the licensee.

Water Services Authority Waterford City Council.

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Weekly During all weeks of plant operation and, in the case of emissions,

when emissions are taking place; with at least one measurement in any

one week.

WWTP Waste water treatment plant.



Decision & Reasons for the Decision

The Environmental Protection 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 will not contravene any of the requirements of Section 83(5) of the Environmental Protection Agency Acts 1992 to 2007.

In reaching this decision the Environmental Protection Agency has considered the application, supporting documentation and objection received from the applicant and the reports of its inspectors.

Part I Schedule of Activities Licensed

In pursuance of the powers conferred on it by the Environmental Protection Agency Acts 1992 to 2007, the Agency hereby grants this revised Integrated Pollution Prevention & Control licence to:

Waterford Plating Company Limited

under Section 90(2) of the said Acts to carry on the following activity

:- The surface treatment of metals and plastic materials using an electrolytic or chemical process where the volume of the treatment vats exceeds 30m³

at Unit 605/606/655, Northern Industrial Estate, Old Kilmeadan Road, Waterford subject to the following twelve Conditions, with the reasons therefor and associated schedules attached thereto.

Part II Schedule of Activities Refused

None of the proposed activities as set out in the licence application have been refused.



Part III Conditions

Condition 1. Scope

- 1.1 IPPC activities at this installation shall be restricted to those listed and described in *Part I Schedule of Activities Licensed*, and shall be as set out in the licence application or as modified under Condition 1.4 of this licence and subject to the conditions of this licence.
- 1.2 Activities at this installation shall be limited as set out in *Schedule A:* Limitations of this licence.
- 1.3 For the purposes of this licence, the installation authorised by this licence is the area of land outlined in red on Drawing Ref: WPP0280-01 Rev-04 (Title: Attachment E.1 Environmental Management Plan) of the application. Any reference in this licence to "installation" shall mean the area thus outlined in red. The licensed activity shall be carried on only within the area outlined.
- 1.4 No alteration to, or reconstruction in respect of, the activity, or any part thereof, that would, or is likely to, result in
 - (i) a material change or increase in:
 - the nature or quantity of any emission;
 - the abatement/treatment or recovery systems;
 - the range of processes to be carried out;
 - the fuels, raw materials, intermediates, products or wastes generated, or
 - (ii) any changes in:
 - site management, infrastructure or control with adverse environmental significance;

shall be carried out or commenced without prior notice to, and without the agreement of, the Agency.

- 1.5 The installation shall be controlled, operated and maintained and emissions shall take place as set out in the licence. All programmes required to be carried out under the terms of this licence become part of this licence.
- 1.6 This licence is for the purpose of IPPC licensing under the EPA Acts 1992 to 2007 only and nothing in this licence shall be construed as negating the licensee's statutory obligations or requirements under any other enactments or regulations.
- 1.7 This licence has been granted in substitution for the licence granted to the licensee on 27th August 1998 (Register No P0280-01). The previous IPPC licence (Reg No P0280-01) is superseded by this revised licence.

Reason: To clarify the scope of this licence.



Condition 2. Management of the Installation

2.1 Installation Management

- 2.1.1 The licensee shall employ a suitable qualified and experienced installation manager who shall be designated as the person in charge. The installation manager or a nominated, suitably qualified and experienced deputy shall be present on the installation at all times during its operation or as otherwise required by the Agency.
- 2.1.2 The licensee shall ensure that personnel performing specifically assigned tasks shall be qualified on the basis of appropriate education, training and experience as required and shall be aware of the requirements of this licence.
- 2.2 Environmental Management System (EMS)
 - 2.2.1 The licensee shall maintain an Environmental Management System (EMS). The EMS shall be updated on an annual basis.
 - 2.2.2 The EMS shall include, as a minimum, the following elements:
 - 2.2.2.1 Management and Reporting Structure.
 - 2.2.2.2 Schedule of Environmental Objectives and Targets.

licensee shall maintain a Schedule The Environmental Objectives and Targets. The schedule shall, as a minimum, provide for a review of all operations and processes, including an evaluation of practicable options, for energy and resource efficiency, the use of cleaner technology, cleaner production, and the prevention, reduction and minimisation of waste and shall include waste reduction targets. The schedule shall include time frames for the achievement of set targets and shall address a five-year period as a minimum. The schedule shall be reviewed annually and amendments thereto notified to the Agency for agreement as part of the Annual Environmental Report (AER).

2.2.2.3 Environmental Management Programme (EMP)

The licensee shall, maintain an EMP, including a time schedule, for achieving the Environmental Objectives and Targets prepared under Condition 2.2.2.2. Once agreed the EMP shall be maintained by the licensee. It shall include:

- designation of responsibility for targets;
- the means by which they may be achieved;
- the time within which they may be achieved.



The EMP shall be reviewed annually and amendments thereto notified to the Agency for agreement as part of the Annual Environmental Report (AER).

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.

2.2.2.4 Documentation

- (i) The licensee shall maintain an environmental management documentation system, which shall be to the satisfaction of the Agency.
- (ii) The licensee shall issue a copy of this licence to all relevant personnel whose duties relate to any condition of this licence.

2.2.2.5 Corrective Action

The licensee shall establish and maintain procedures to ensure that corrective action is taken should the specified requirements of this licence not be fulfilled. The responsibility and authority for persons initiating further investigation and corrective action in the event of a reported non-conformity with this licence shall be defined.

2.2.2.6 Awareness and Training

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.

2.2.2.7 Communications Programme

The licensee shall establish and maintain a Public Awareness and Communications Programme to ensure that members of the public can obtain information at the installation, at all reasonable times, concerning the environmental performance of the installation.

2.2.2.8 Maintenance Programme

The licensee shall establish and maintain a programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment. Appropriate record keeping and diagnostic testing shall support this maintenance programme. The licensee shall clearly allocate responsibility for the planning, management and



execution of all aspects of this programme to appropriate personnel (see Condition 2.1 above).

2.2.2.9 Efficient Process Control

The licensee shall maintain a programme to ensure there is adequate control of processes under all modes of operation. The programme shall identify the key indicator parameters for process control performance, as well as identifying methods for measuring and controlling these parameters. Abnormal process operating conditions shall be documented, and analysed to identify any necessary corrective action.

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. Infrastructure and Operation

3.1 The licensee shall establish and maintain, for each component of the installation, all infrastructure referred to in this licence in advance of the commencement of the licensed activities in that component, or as required by the conditions of this licence. Infrastructure specified in the application that relates to the environmental performance of the installation and is not specified in the licence, shall be installed in accordance with the schedule submitted in the application.

3.2 Installation Notice Board

- 3.2.1 The licensee shall, within four months of the date of grant of this licence, provide an Installation Notice Board on the installation so that it is legible to persons outside the main entrance to the installation. The minimum dimensions of the board shall be 1200 mm by 750 mm. The notice board shall be maintained thereafter.
- 3.2.2 The board shall clearly show:
 - (i) the name and telephone number of the installation;
 - (ii) the normal hours of operation;
 - (iii) the name of the licence holder;
 - (iv) an emergency out of hours contact telephone number;
 - (v) the licence reference number; and
 - (vi) where environmental information relating to the installation can be obtained.



- 3.3 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.
- 3.4 In the case of composite sampling of aqueous emissions from the operation of the installation, a separate composite sample or homogeneous sub-sample (of sufficient volume as advised) shall be retained as required for EPA use.
- 3.5 The licensee shall clearly label and provide safe and permanent access to all on-site sampling and monitoring points and to off-site points as required by the Agency. The requirement with regard to off-site points is subject to the prior agreement of the landowner(s) concerned.
- 3.6 Tank, Container and Drum Storage Areas
 - 3.6.1 All tank, container and drum storage areas shall be rendered impervious to the materials stored therein. Bunds shall be designed having regard to Agency guidelines 'Storage and Transfer of Materials for Scheduled Activities' (2004).
 - 3.6.2 All 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; or
 - (ii) 25% of the total volume of substance that could be stored within the bunded area.
 - 3.6.3 All drainage from bunded areas shall be treated as hazardous waste unless it can be demonstrated to be otherwise. All drainage from bunded areas shall be diverted for collection and safe disposal.
 - 3.6.4 All inlets, outlets, vent pipes, valves and gauges must be within the bunded area.
 - 3.6.5 All tanks, containers and drums shall be labelled to clearly indicate their contents.
- 3.7 The licensee shall have in storage an adequate supply of containment booms and/or suitable absorbent material to contain and absorb any spillage at the installation. Once used, the absorbent material shall be disposed of at an appropriate facility.
- 3.8 Silt Traps and Oil Separators

The licensee shall install and maintain silt traps and oil separators at the installation to ensure that all storm water discharges from the installation pass through a silt trap and oil separator in advance of discharge.

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



- 3.9.2 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 three months of date of notification by the Agency.
- 3.9.3 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 3.9.1 and 3.9.2 above.
- 3.10 All pumps sumps or other treatment plant chambers from which spillage of environmentally significant materials might occur in such quantities as are likely to breach local or remote containment or separators, shall be fitted with high liquid level alarms (or oil detectors as appropriate) from the date of grant of this licence.
- 3.11 The provision of a catchment system to collect any leaks from flanges and valves of all over-ground pipes used to transport material other than water shall be examined. This shall be incorporated into a Schedule of Environmental Objectives and Targets set out in Condition 2 of this licence for the reduction of fugitive emissions.
- 3.12 The licensee shall, maintain in a prominent location on the site a wind sock, or other wind direction indicator, which shall be visible from the public roadway outside the site.

Reason: To provide for appropriate operation of the installation to ensure protection of the environment.

Condition 4. Interpretation

- 4.1 Emission limit values for emissions to atmosphere in this licence shall be interpreted in the following way:
 - 4.1.1 Continuous Monitoring
 - (i) No 24 hour mean value shall exceed the emission limit value.
 - (ii) 97% of all 30 minute mean values taken continuously over an annual period shall not exceed 1.2 times the emission limit value.
 - (iii) No 30 minute mean value shall exceed twice the emission limit value.
 - 4.1.2 Non-Continuous Monitoring
 - (i) For any parameter where, due to sampling/analytical limitations, a 30 minute sample is inappropriate, a suitable sampling period should be employed and the value obtained therein shall not exceed the emission limit value.



- (ii) For flow, no hourly or daily mean value, calculated on the basis of appropriate spot readings, shall exceed the relevant limit value.
- (iii) For all other parameters, no 30 minute mean value shall exceed the emission limit value.
- 4.2 The concentration and volume flow limits for emissions to atmosphere specified in this licence shall be achieved without the introduction of dilution air and shall be based on gas volumes under standard conditions of:
 - 4.2.1 In the case of non-combustion gases:

Temperature 273K, Pressure 101.3 kPa (no correction for oxygen or water content).

4.2.2 In the case of combustion gases:

Temperature 273K, Pressure 101.3 kPa, dry gas; 3% oxygen for liquid and gas fuels, 6% oxygen for solid fuels.

- 4.3 Emission limit values for emissions to sewer/waters in this licence shall be interpreted in the following way:
 - 4.3.1 Continuous Monitoring
 - (i) No flow value shall exceed the specific limit.
 - (ii) No pH value shall deviate from the specified range.
 - (iii)No temperature value shall exceed the limit value.
 - 4.3.2 Composite Sampling
 - (i) No pH value shall deviate from the specified range.
 - (ii) For parameters other than pH and flow, eight out of ten consecutive composite results, based on flow proportional composite sampling, shall not exceed the emission limit value. No individual results similarly calculated shall exceed 1.2 times the emission limit value.
 - 4.3.3 Discrete Sampling

For parameters other than pH and temperature, no grab sample value shall exceed 1.2 times the emission limit value.

- 4.4 Where the ability to measure a parameter is affected by mixing before emission, then, with agreement from the Agency, the parameter may be assessed before mixing takes place.
- 4.5 Noise

Noise from the installation shall not give rise to sound pressure levels (L_{eq} , T) measured at the boundary of the installation, which exceed the limit value(s).

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



Condition 5. Emissions

- 5.1 No specified emission from the installation shall exceed the emission limit values set out in *Schedule B: Emission Limits* of this licence. There shall be no other emissions of environmental significance.
- 5.2 No emissions, including odours, from the activities carried on at the site shall result in an impairment of, or an interference with amenities or the environment beyond the installation boundary or any other legitimate uses of the environment beyond the installation boundary.
- 5.3 No substance shall be discharged in a manner, or at a concentration, that, following initial dilution, causes tainting of fish or shellfish.

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

Condition 6. Control and Monitoring

- 6.1 The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out below and as in accordance with *Schedule C: Control & Monitoring* of this licence.
 - 6.1.1 Analyses shall be undertaken by competent staff in accordance with documented operating procedures.
 - 6.1.2 Such procedures shall be assessed for their suitability for the test matrix and performance characteristics shall be determined.
 - 6.1.3 Such procedures shall be subject to a programme of Analytical Quality Control using control standards with evaluation of test responses.
 - 6.1.4 Where any analysis is sub-contracted it shall be to a competent laboratory.
- 6.2 The licensee shall ensure that:
 - (i) sampling and analysis for all parameters listed in the Schedules to this licence; and
 - (ii) any reference measurements for the calibration of automated measurement systems;
 - shall be carried out in accordance with CEN-standards. If CEN standards are not available, ISO, national or international standards that will ensure the provision of data of an equivalent scientific quality shall apply.
- 6.3 All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity is being carried on 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 alternative sampling and monitoring facilities shall be put in place. The use of alternative equipment, other than in emergency situations, shall be as agree by the Agency.

- 6.4 Monitoring and analysis equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission/discharge (or ambient conditions where that is the monitoring objective).
- 6.5 All treatment/abatement and emission control equipment shall be calibrated and maintained in accordance with the instructions issued by the manufacturer/supplier or installer.
- 6.6 The frequency, methods and scope of monitoring, sampling and analyses, as set out in this licence, may be amended with the agreement of the Agency following evaluation of test results.
- 6.7 The licensee shall prepare a programme, to the satisfaction of the Agency, for the identification and reduction of fugitive emissions using an appropriate combination of best available techniques. This programme shall be included in the Environmental Management Programme.
- 6.8 The integrity and water tightness of all underground pipes, tanks, bunding structures and containers and their resistance to penetration by water or other materials carried or stored therein shall be tested and demonstrated by the licensee. This testing shall be carried out by the licensee at least once every three years thereafter and reported to the Agency on each occasion. This testing shall be carried out in accordance with any guidance published by the Agency. A written record of all integrity tests and any maintenance or remedial work arising from them shall be maintained by the licensee.
- 6.9 The drainage system (i.e., gullies, manholes, any visible drainage conduits and such other aspects as may be agreed) and bunds, silt traps and oil separators shall be inspected weekly and desludged as necessary. All sludge and drainage from these operations shall be collected for safe disposal. The drainage system, bunds, silt traps and oil interceptors shall be properly maintained at all times

6.10 Process Effluent

A representative sample of effluent shall be screened for the presence of organic compounds within 6 months of date of grant of this licence. Such screening shall be repeated at intervals as requested by the Agency thereafter.

6.11 An Inspection for leaks on all flanges and valves on over-ground pipes used to transport materials other than water shall be carried out weekly. A log of such inspections shall be maintained.

6.12 Storm Water

A visual examination of the storm water discharges shall be carried out weekly. A log of such inspections, shall be maintained.



6.13 Noise

The licensee shall carry out a noise survey of the site operations annually. The survey programme shall be undertaken in accordance with the methodology specified in the 'Environmental Noise Survey Guidance Document' as published by the Agency.

6.14 Pollutant Release and Transfer Register (PRTR)

The licensee shall prepare and report a PRTR for the site. The substance and/or wastes to be included in the PRTR shall be as agreed by the Agency each year by reference to EC Regulations No. 166/2006 concerning the establishment of the European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC. The PRTR shall be prepared in accordance with any relevant guidelines issued by the Agency and shall be submitted electronically in specified format and as part of the AER.

- 6.15 The licensee shall maintain a record of all organic solvent usage at the installation. This documentation shall be available to the Agency for inspection at all reasonable times. A summary report on annual solvent usage shall be reported annually as part of the AER.
- 6.16 Organic solvents in the Wet/Dry Paint Booth (A2-3)
 - 6.16.1 For emissions to atmosphere that 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.
 - 6.16.2 Coating using organic solvent based paints may only commence in the wet/dry spray booth (A2-3) after receipt of written approval from the Agency.
- 6.17 Particulate PM₁₀ Monitoring

The licensee shall carry out monitoring of emissions from the dry paint booth (A2-2) and the wet/dry paint booth (A2-3) for PM₁₀. A report interpreting these monitoring results shall be submitted to the Agency, within three months of the date of grant of this licence.

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

Condition 7. Resource Use and Energy Efficiency

7.1 The licensee shall carry out an audit of the energy efficiency of the site within one year of the date of grant of this licence. The audit shall be carried out in accordance with the guidance published by the Agency, "Guidance Note on Energy Efficiency Auditing". The energy efficiency audit shall be repeated at intervals as required by the Agency.



- 7.2 The audit shall identify all practicable opportunities for energy use reduction and efficiency and the recommendations of the audit will be incorporated into the Schedule of Environmental Objectives and Targets under Condition 2 above.
- 7.3 The licensee shall identify opportunities for reduction in the quantity of water used on site including recycling and reuse initiatives, wherever possible. Reductions in water usage shall be incorporated into Schedule of Environmental Objectives and Targets.
- 7.4 The licensee shall undertake an assessment of the efficiency of use of raw materials in all processes, having particular regard to the reduction in waste generated. The assessment should take account of best international practice for this type of activity. Where improvements are identified, these shall be incorporated into the Schedule of Environmental Objectives and Targets.

Reason: To provide for the efficient use of resources and energy in all site operations.

Condition 8. Materials Handling

- 8.1 Disposal or recovery of waste on-site shall only take place in accordance with the conditions of this licence and in accordance with the appropriate National and European legislation and protocols.
- 8.2 Waste sent off-site for recovery or disposal shall be transported only by an authorised waste contractor. The waste shall be transported from the site of the activity to the site of recovery/disposal only in a manner that will not adversely affect the environment and in accordance with the appropriate National and European legislation and protocols.
- 8.3 The licensee shall ensure that, in advance of transfer to another person, waste shall be classified, packaged and labelled in accordance with National, European and any other standards which are in force in relation to such labelling.
- The loading and unloading of materials shall be carried out in designated areas protected against spillage and leachate run-off.
- 8.5 Waste shall be stored in designated areas, protected as may be appropriate against spillage and leachate run-off. The waste shall be clearly labelled and appropriately segregated.
- 8.6 No waste classified as green list waste in accordance with the EU Shipment of Waste Regulations (Council Regulation EEC No. 1013/2006, as may be amended) shall be consigned for recovery without the agreement of the Agency.
- 8.7 Waste for disposal/recovery off-site shall be analysed in accordance with Schedule C: Control & Monitoring of this licence.

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8.8 Unless approved in writing, in advance, by the Agency the licensee is prohibited from mixing a hazardous waste of one category with a hazardous waste of another category or with any other non-hazardous waste.

Reason: To provide for the appropriate handling of material and the protection of the environment.

Condition 9. Accident Prevention and Emergency Response

- 9.1 The licensee shall ensure that a documented Accident Prevention Procedure is in place that addresses the hazards on-site, particularly in relation to the prevention of accidents with a possible impact on the environment. This procedure shall be reviewed annually and updated as necessary.
- 9.2 The licensee shall ensure that a documented Emergency Response Procedure is in place that addresses any emergency situation, which may originate onsite. This procedure shall include provision for minimising the effects of any emergency on the environment. This procedure shall be reviewed annually and updated as necessary.
- 9.3 Incidents
 - 9.3.1 In the event of an incident the licensee shall immediately:
 - (i) carry out an investigation to identify the nature, source and cause of the incident and any emission arising therefrom;
 - (ii) isolate the source of any such emission;
 - (iii) evaluate the environmental pollution, if any, caused by the incident;
 - (iv) identify and execute measures to minimise the emissions/malfunction and the effects thereof;
 - (v) identify the date, time and place of the incident;
 - (vi) notify the Agency and other relevant authorities.
 - 9.3.2 The licensee shall provide a proposal to the Agency for its agreement within one month of the incident occurring or as otherwise agreed by the Agency, to:
 - (i) identify and put in place measures to avoid recurrence of the incident; and
 - (ii) identify and put in place any other appropriate remedial actions.

Reason: To provide for the protection of the environment.



Condition 10. Decommissioning & Residuals Management

- 10.1 Following termination, or planned cessation for a period greater than six months, of use or involvement of all or part of the site in the licensed activity, the licensee shall, to the satisfaction of the Agency, decommission, render safe or remove for disposal/recovery any soil, subsoil, buildings, plant or equipment, or any waste, materials or substances or other matter contained therein or thereon, that may result in environmental pollution.
- 10.2 Decommissioning Management Plan (DMP)
 - 10.2.1 The licensee shall prepare, to the satisfaction of the Agency, a fully detailed and costed plan for the decommissioning or closure of the site or part thereof. This plan shall be submitted to the Agency for agreement within six months of the date of grant of the licence.
 - 10.2.2 The plan shall be reviewed annually and proposed amendments thereto notified to the Agency for agreement as part of the AER. No amendments may be implemented without the agreement of the Agency.
 - 10.2.3 The licensee shall have regard to the Environmental Protection Agency Guidance on Environmental Liability Risk Assessment, Decommissioning Management Plans and Financial Provision when implementing Condition 10.2.1 above.
- 10.3 The Decommissioning Management Plan shall include, as a minimum, the following:
 - (i) a scope statement for the plan;
 - (ii) the criteria that define the successful decommissioning of the activity or part thereof, which ensures minimum impact on the environment:
 - (iii) a programme to achieve the stated criteria;
 - (iv) where relevant, a test programme to demonstrate the successful implementation of the decommissioning plan; and
 - (v) details of the costings for the plan and the financial provisions to underwrite those costs.
- 10.4 A final validation report to include a certificate of completion for the Decommissioning Management Plan, for all or part of the site as necessary, shall be submitted to the Agency within three months of execution of the plan. The licensee shall carry out such tests, investigations or submit certification, as requested by the Agency, to confirm that there is no continuing risk to the environment.

Reason: To make provision for the proper closure of the activity ensuring protection of the environment.

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Condition 11. Notification, Records and Reports

- 11.1 The licence 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:
 - (i) any release of environmental significance to atmosphere from any potential emissions point including bypasses;
 - (ii) any emission that does not comply with the requirements of this licence;
 - (iii) any malfunction or breakdown of key control equipment or monitoring equipment set out in *Schedule C: Control and Monitoring* of this licence which is likely to lead to loss of control of the abatement system; and
 - (iv) any incident with the potential for environmental contamination of surface water or groundwater, or posing an environment 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, summary details of the occurrence, and where available, the steps taken to minimise any emissions.

- 11.2 In the event of any incident which relates to discharges to sewer having taken place, the licensee shall notify the Local and Water Services Authority as soon as practicable after such an incident.
- 11.3 In the case of any incident relating to discharges to water, the licensee shall notify the Local and Water Services Authority and the Southern Regional Fisheries Board as soon as practicable after such an incident.
- 11.4 The licensee shall make a record of any incident. This record shall include details of the nature, extent, and impact of, and circumstances giving rise to, the incident. The record shall include all corrective actions taken to manage the incident, minimise wastes generated and the effect on the environment, and avoid recurrence. The licensee shall, as soon as practicable following incident notification, submit to the Agency the incident record.
- 11.5 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 (if provided), 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.
- 11.6 The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence and all other such monitoring which relates to the environmental performance of the installation.
- 11.7 The licensee shall as a minimum keep the following documents at the site:
 - (i) the licences relating to the installation;
 - (ii) the current EMS for the installation;



- (iii) the previous year's AER for the installation;
- (iv) records of all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence and all other such monitoring which relates to the environmental performance of the installation;
- (v) relevant correspondence with the Agency;
- (vi) up to date site drawings/plans showing the location of key process and environmental infrastructure, including monitoring locations and emission points;
- (vii) up to date Standard Operational Procedures for all processes, plant and equipment necessary to give effect to this licence or otherwise to ensure that standard operation of such processes, plant or equipment does not result in unauthorised emissions to the environment; and
- (viii) any elements of the licence application or EIS documentation referenced in this licence.

This documentation shall be available to the Agency for inspection at all reasonable times.

- 11.8 The licensee shall submit to the Agency, by the 31st March of each year, an AER covering the previous calendar year. This report, which shall be to the satisfaction of the Agency, shall include as a minimum the information specified in *Schedule D: Annual Environmental Report* of this licence and shall be prepared in accordance with any relevant guidelines issued by the Agency.
- 11.9 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:
 - the tonnages and EWC Code for the waste materials imported and/or sent off-site for disposal/recovery;
 - (ii) the names of the agent and carrier of the waste, and their waste collection permit details, if required (to include issuing authority and vehicle registration number);
 - (iii) details of the ultimate disposal/recovery destination facility for the waste and its appropriateness to accept the consigned waste stream, to include its permit/licence details and issuing authority, if required;
 - (iv) written confirmation of the acceptance and disposal/recovery of any hazardous waste consignments sent off-site;
 - (v) details of all waste consigned abroad for Recovery and classified as 'Green' in accordance with the EU Shipment of Waste Regulations (Council Regulation EEC No. 1013/2006, as may be amended). The rationale for the classification must form part of the record;
 - (vi) details of any rejected consignments;
 - (vii) details of any approved waste mixing;



- (viii) the results of any waste analyses required under Schedule C: Control & Monitoring, of this licence; and
- (ix) the tonnage and EWC Code for the waste materials recovered/disposed on-site.
- 11.10 The licensee shall submit report(s) as required by the conditions of this licence to the Agency's Headquarters in Wexford, or to such other Agency office as may be specified by the Agency.
- 11.11 All reports shall be certified accurate and representative by the installation manager or a nominated, suitably qualified and experienced deputy.

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

Condition 12. Financial Charges and Provisions

12.1 Agency Charges

- 12.1.1 The licensee shall pay to the Agency an annual contribution of €11,648.00, or such sum as the Agency from time to time determines, having regard to variations in the extent of reporting, auditing, inspection, sampling and analysis or other functions carried out by the Agency, towards the cost of monitoring the activity as the Agency considers necessary for the performance of its functions under the Environmental Protection Agency Acts 1992 to 2007. The first payment shall be a pro-rata amount for the period from the date of grant of this licence to the 31st day of December, and shall be paid to the Agency within one month from the date of grant of the licence. In subsequent years the licensee shall pay to the Agency such revised annual contribution as the Agency shall from time to time consider necessary to enable performance by the Agency of its relevant functions under the Environmental Protection Agency Acts 1992 to 2007, and all such payments shall be made within one month of the date upon which demanded by the Agency.
- 12.1.2 In the event that the frequency or extent of monitoring or other functions carried out by the Agency needs to be increased, the licensee shall contribute such sums as determined by the Agency to defray its costs in regard to items not covered by the said annual contribution.

12.2 Water Services Authority Charges

The licensee shall pay to the Water Services Authority such sum as may be determined from time to time, having regard to the variations in the cost of providing drainage and the variation in effluent reception and treatment costs. Payment to be made on demand.



12.3 Environmental Liabilities

- 12.3.1 The licensee shall as part of the AER, provide an annual statement as to the measures taken or adopted at the site in relation to the prevention of environmental damage, and the financial provisions in place in relation to the underwriting of costs for remedial actions following anticipated events or accidents/incidents, as may be associated with the carrying on of the activity.
- 12.3.2 The licensee shall arrange for the completion, by an independent and appropriate qualified consultant, of a comprehensive and fully costed Environmental Liabilities Risk Assessment (ELRA) to address the liabilities from past and present activities. The assessment shall include those liabilities and costs identified in Condition 10 for execution of the DMP. A report on this assessment shall be submitted to the Agency for agreement within twelve months of date of grant of this licence. The ELRA shall be reviewed as necessary to reflect any significant change on site, and in any case every three years following initial agreement. The results of the review shall be notified as part of the AER.
- 12.3.3 As part of the measures identified in Condition 12.3.1, the licensee shall, to the satisfaction of the Agency, make financial provision to cover any liabilities identified in Condition 12.3.2. The amount of indemnity held shall be reviewed and revised as necessary, but at least annually. Proof of renewal or revision of such financial indemnity shall be included in the annual 'Statement of Measures' report identified in Condition 12.3.1.
- 12.3.4 The licensee shall have regard to the Environmental Protection Agency Guidance on Environmental Liability Risk Assessment, Decommissioning Management Plans and Financial Provision when implementing Conditions 12.3.2 and 12.3.3 above.

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



SCHEDULE A: Limitations

There are no limitations on the installation specified in the Schedule.

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SCHEDULE B: Emission Limits

B.1 Emissions to Air

Emission Point Reference No:

A2-1

Location:

Unit 605/606 (Wet spray booth extraction)

Volume to be emitted:

Maximum in any one day: Maximum rate per hour: 50,730 Nm³/d 5,640 Nm³/hr

Minimum discharges height:

9 m above ground

Parameter Parameter	Emission Limit Value
TA Luft Class I compounds	20 mg/m ³
TA Luft Class II compounds	100 mg/m ³
TA Luft Class III compounds	150 mg/m^3

Emission Point Reference No:

A2-2

Location:

Unit 655 (Dry spray booth)

Volume to be emitted:

Maximum in any one day:

64,460 Nm³/d

Maximum rate per hour:

 $7,165 \text{ Nm}^3/\text{hr}$

Minimum discharges height:

4.28 m above ground

Parameter	Emission Limit Value	
Total Particulates	15 mg/m ^{3 Note 1}	20mg/m ^{3 Note 2}

Note 1: Applies from date of grant of licence.

Note 2:

Upon satisfactory completion of a PM₁₀ monitoring programme as specified in Condition 6.17, an emission limit value of

20 mg/m³ may be agreed by the Agency.

Emission Point Reference No:

A2-3

Location:

Unit 655 (Wet/dry spray booth)

Volume to be emitted:

Maximum in any one day:

92,395 Nm³/d

Maximum rate per hour:

 $10, 270 \text{ Nm}^3/\text{hr}$

Minimum discharges height:

5.18 m above ground

Parameter	Emission I	imit Value
Total Particulates	15 mg/m ^{3 Note 2}	20mg/m ^{3 Note 3}
TA Luft Class I compounds Note I	20 n	ng/m³
TA Luft Class II compounds Note 1	100 1	ng/m³
TA Luft Class III compounds Note i	150 1	ng/m³

Note 1: No coating using organic solvents shall take place subject to Condition 6.16.

Note 2: Applies from date of grant of licence.

Note 3: Upon satisfactory completion of a PM₁₀ monitoring programme as specified in Condition 6.17, an emission limit value of

20 mg/m3 may be agreed by the Agency.



B.2 Emissions to Water

There shall be no emissions to water of environmental significance.

B.3 Emissions to Sewer

Emission Point Reference No:

SE1

Name of Receiving Sewer:

Waterford City Council foul sewer

Location:

North east corner of Unit 605/606

Volume to be emitted:

Maximum in any one day:

 100 m^3

Maximum rate per hour:

 7.5 m^3

Parameter	Emission Limit Value
Temperature	35°C (max)
pH	6 - 10
	mg/1
BOD	25
COD	100
Suspended Solids	125
Nitrates (as N)	30
Total Phosphorus (as P)	5
Sulphates (as SO ₄)	100
Oils, fats & grease	10
Detergents	10
Copper	0.5
Zinc	0.5
Chromium (as Cr VI)	0.1
Chromium (as total Cr)	0.5
Cyanide	0.2

B.4 Noise Emissions

Daytime dB(A) LAss (30	minutes)	Night-time dB(A) L _{Aeq} (30 minutes)
55 Note I		45 Note 1

Note 1: There shall be no clearly audible tonal component or impulsive component in the noise emission from the activity of any noise-sensitive location/boundary.



SCHEDULE C: Control & Monitoring

C.1.1. Control of Emissions to Air

Emission Point Reference No:

A2-1, A2-2

Description of Treatment:

Particulate removal

Control Parameter	Monitoring	Key Equipment Note I
Air Flow	Annual air velocities	Air extractor fans
Particle Filtration	Air volume	Procart filter

Note 1: The licensee shall maintain appropriate access to standby and/or spares to ensure the operation of the abatement

Emission Point Reference No:

A2-3

Description of Treatment:

Particulate removal

Control Parameter	Monitoring	Key Equipment Note I
Air Flow	Annual air velocities	Air extractor fans
Particle Filtration	Air volume	Baffle
Particle Extraction	Air volume	Water scrubber

Note 1: The licensee shall maintain appropriate access to standby and/or spares to ensure the operation of the abatement system.

C.1.2. Monitoring of Emissions to Air

Emission Point Reference No:

AE2-1, AE2-3

Parameter	Monitoring Frequency	Analysis Method/Technique
Flow	Annually	Manometer, Pitot tube
Particulates Note 1	Annually	Filter/Gravimetry
PM ₁₀ Note 1	Annually	Standard Method
TA Luft Organics Class I	Annually	Absorption & GC or GC and/or MS
TA Luft Organics Class II	Annually	Absorption & GC or GC and/or MS
TA Luft Organics Class III	Annually	Absorption & GC or GC and/or MS

Note 1: Particulate and PM₁₀ monitoring for AE2-3 only.



Emission Point Reference No:

AE2-2

Parameter	Monitoring Frequency	Analysis Method/Technique
Flow	Annually	Manometer, Pitot tube
Metals	Annually	Desorption, ICPMS
Particulates	Annually	Filter/Gravimetry
PM ₁₀	Annually	Standard Method

C.2.1. Monitoring of Storm Water Emissions

Emission Point Reference No:

SW1

Parameter	Monitoring Frequency	Analysis Method/Technique
COD	Quarterly	Standard method
Visual Inspection	Weekly	Sample and examine for colour and odour.

C.3.1. Control of Emissions to Sewer

Emission Point Reference No:

SE₁

Description of Treatment:

Wastewater Treatment

Equipment:

Effluent balancing, pH adjustment, settlement tank

Control Parameter	Monitoring	Key Equipment Note 1	
Flow	Continuous	Flowmeter	
Zinc Removal	As required	Acid & Caustic dosing pump Flocculant dosing pump	
Settlement	As required		
Hypochlorite dosing for cyanide removal Note 2	As required	Redox probe	
Effluent Balancing	As required	Agitators	
Effluent (pH) Neutralisation	As required	Dosing pumps	
Liquid Sludge Removal	As required	Pumps	

The licensee shall maintain appropriate access to standby and/or spares to ensure the operation of the abatement Note 1: system. Meters and probes shall be calibrated in line with the manufacturers instructions. Hypochlorite dosing to be incorporated as long as the cyanide zinc plating process is still in use.

Note 2:



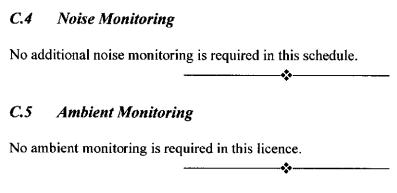
C.3.2. Monitoring of Emissions to Sewer

Emission Point Reference No:

SE₁

Parameter	Monitoring Frequency		
Flow	Continuous		
Temperature	Continuous	On-line temperature probe with recorder	
рН	Continuous	pH electrode/meter and recorder	
COD	Quarterly Note I	Standard Method	
BOD	Quarterly Note 1	Standard Method	
Suspended solids	Quarterly Note 1	Standard Method	
Sulphates	Quarterly	Standard Method	
Oils, fats & grease	Quarterly	Standard Method	
Detergents	Quarterly	Standard Method	
Total Phosphorous (as P)	Quarterly	Standard Method	
Aluminium	Quarterly	Standard Method	
Copper	Quarterly	AA/ICP	
Zinc	Quarterly	AA/ICP	
Chromium (VI & Total)	Monthly	AA/ICP	
Cyanide	Monthly	Standard method	

Note 1: The licensee shall install a composite sampler within three months of the date of grant of this licence. All samples thereafter shall be collected on a 24 hour flow proportional composite sampling basis.



C.6 Waste Monitoring

Waste Class	Frequency	Parameter	Method
Other Note I			

Note 1: Analytical requirements to be determined on a case by case basis.



SCHEDULE D: Annual Environmental Report

Annual Environmental Report Content Note 1

Emissions from the installation.

Waste management record.

Resource consumption summary.

Complaints summary.

Schedule of Environmental Objectives and Targets.

Environmental management programme - report for previous year.

Environmental management programme - proposal for current year.

Pollutant Release and Transfer Register - report for previous year.

Pollutant Release and transfer Register - proposal for current year.

Noise monitoring report summary.

Ambient monitoring summary.

Tank and pipeline testing and inspection report.

Reported incidents summary.

Energy efficiency audit report summary.

Report on annual organic solvent usage at the installation.

Report on the assessment of the efficiency of use of raw materials in processes and the reduction in waste generated.

Report on progress made and proposals being developed to minimise water demand and the volume of trade effluent discharges.

Review of decommissioning management plan.

Statement of measures in relation to prevention of environmental damage and remedial actions (Environmental Liabilities).

Environmental Liabilities Risk Assessment Review (every three years or more frequently as dictated by relevant on-site change including financial provisions.

Any other items specified by the Agency.

Note 1: Content may be revised subject to the agreement of the Agency.

Sealed by the seal of the Agency on this the 12th day of June 2009.

PRESENT when the seal of the Agency was affixed hereto:

Laura Burke,

Director/Authorised Person