

Noeleen Keavey,
EPA
Headquarters PO Box 3000
Johnstown Castle Estate,
Co. Wexford.
30th October 2012.



Register No: PO269-01
Company Name: Basta Parsons Ltd
Company Address: Gallagher Rd. Tubbercurry, Co. Sligo
Ref: EPA Ref: P0269-02 Licence Review
Date of report: 15 October 2012

Dear Noeleen

We would like to place an objection to the following points of the new licence PO269-02.

3.2/ 3.2.2 Installation Notice Board

3.11 (p10)

6.10 (p13)

6.11(p13)

6.14.1 (Storm Water)

6.14.2

6.16

6.18

6.19

10.2.1

12.2.2

B. I (p21) Emissions to Air

B.2 Emissions to Water.

C. 2.3. Monitoring of Storm Water Emissions

3.2 (p.9) Installation Notice Board

3.2.1 The licensee shall, within one month 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.

Objection to 3.2.1 :

Timeframe of 1 month for installation is too short – requested it be extended to 3 months

3.2.2 The Board shall clearly show:

the name and telephone number of the installation;

the normal hours of operation;

the name of the licence holder;

an emergency out of hours contact telephone number;

the licence reference number; and

where environmental information relating to the installation can be obtained

Objection to 3.2.2 Notice Board Information

Basta is objecting to the proposal of the display of a persons contact details for out of hours. Since Basta is situated on an open site, it cannot exclude members of the public obtaining contact numbers for reasons other than emergencies. Emergency out of hours contact details are kept by the local garda station and the fire brigade. We propose the out of hours emergency contact number will be 999.

3.11 (p10) 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.

Objection to 3.11 wind direction indicator

Basta is objecting to installation of a wind direction indicator. There are no visible air emissions being produced and we are continuously below our discharge limit of 6000 M3/Hr with results of 5000 M3/Hr or lower. Basta has no complaints or no issues with odour coming from our premises, and this will be an unnecessary cost with no environmental benefit.

(See Appendix E. Air monitoring)

6.10 (p13) The licensee shall carry out a study of the process effluent treatment system(s) to assess effectiveness in removing pollutants from the effluent discharged to surface water. This study shall address as a minimum; but is not restricted to, the adequacy of the existing equipment, the upgrading or replacement of equipment, the technology in use and the application of BATNEEC for effluent treatment. The findings of the study, together with proposals for implementation shall be submitted to the Agency within six months from date of grant of licence.

Objection to 6.10

A study project was carried out on the Waste Water treatment plant in 2004, and submitted to the EPA (See Appendix A) . This describes the WWTP plant as adequate and fit for purpose and is confirmed by our full compliance with SW1 effluent discharges. We propose this report be updated to reflect current reduced hydraulic load to the plant and assess current BATNEEC technology if available.

Basta would ask to extend the timeframe for submission of this report from 6 months to 12 months

6.11(p13) The measures identified by the study referred to in condition 6.10 as being necessary to ensure on-going compliance with the requirements of this licence shall be put in place within twelve months from date of grant of licence.

Objection to 6.11

Basta cannot agree with this condition and a set time frame until 6.10 has been completed and BATNEEC technology identified if available. The timeframe would then be agreed if applicable.

6.14 (p13) Storm Water

All conditions of 6.14 should be incorporated into Condition 6.18 and actioned after the report in 6.18 is complete.

6.14.1 (Storm Water) A visual examination of the storm water discharges at SD1 shall be carried out daily. A log of such inspections shall be maintained.

Objection to 6.14.1

Basta is objecting to the increase in the frequency of the visual inspection from weekly to daily inspection as no issues have been identified in the weekly visual inspection and this will be a cost add activity without any environmental benefit.

6.14.2 (p13) The licensee shall, within six months of date of grant of this licence, establish suitable trigger levels for zinc and chlorinated hydrocarbons (CHC) in storm water discharges, such that storm waters exceeding these trigger levels will be diverted for retention and suitable disposal, having regard to the findings of Condition 6.18.

Objection to 6.14.2

Condition 6.14.2 should be incorporated into 6.18. We would ask for a 9 month timeframe on this report as opposed to the 6 month specified. We have previously submitted a report on SD1 and this report needs to be reviewed and updated by Basta Parsons Ltd for re-submission before trigger levels can be established. Basta are in existence since 1955 with an existing IPPC Licence and object to the condition that any storm water exceeding these trigger levels have to be diverted for retention and suitable disposal as it is not practical, but agree to putting a Response Programme in place as recommended in the "Guidance on the Setting of Trigger Values for Storm Water Discharges To Offsite Surface Waters". Basta understands there are issues with storm water discharge (SD1) but with the agreement of the EPA site inspector, our priorities have been focused on ground water and the MNA program that is currently worked on. Current analysis of SD1 shows that there is a reduction in the level of zinc from 0.208 in Mar'11 to 0.128 mg/l in Mar'12 (38%) and VOC analysis only exhibit trace amounts of 1.1.1 Trichloroethane & Trichloroethene etc. (See Appendix G)

6.16(p14) 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 'Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)' as published by the Agency.

Objection to the above changes in 6.16 Noise.

Basta is objecting to increase in frequency from once every 3 years to Annually.

On reviewing the last 10 years of reports, Basta has been compliant and within the acceptable noise levels as set by the new licence (See Appendix B). Basta has had no issues or complaints on noise levels and see no justification in the increase in frequency.

6.18 The licensee shall, within three months from date of grant of licence, carry out an investigation to identify the nature, source and cause of the zinc and chlorinated hydrocarbon contamination at SD 1 (storm water emission point). The licensee shall isolate the source, evaluate the environmental pollution and put in place measures to avoid recurrence and appropriate remedial actions. A report on the investigation and all corrective actions taken shall be submitted to the Agency within three months from date of grant of licence.

Objection to 6.18

Basta requires an extension of time frame for this report from 3 months to 9 months.

Basta request that 6.14.1, 6.14.2, 6.14.3, and 6.14.4. be incorporated into 6.18

Refer to points raised in 6.14.2

6.19(p14) The licensee shall, not later than six months from the date of grant of licence submit to the Agency for agreement a proposal for the relocation of the final effluent discharge point to the Tubbercurry River. Having regard to the proposal submitted the licensee shall, in agreement with the Agency implement agreed proposal before the 22 December 2015.

Objection to 6.19

Basta is objecting to the final effluent discharge point being relocated to the Tubbercurry river, as there has been a study completed in 2004 regarding this matter. The study confirmed that the current final discharge effluent point had no negative impact on the surrounding area of the site and can be updated if necessary as our volumes have reduced over the last number of years. An analysis of samples from up river and down river from Basta discharge point show a reduction in some analysed substances being tested (See App C). Also included are toxicity reports for the past 3 years. (See appendix H) which are also in full compliance. Basta do not believe or understand the necessity to change this and require clarification as to what is being requested and why. This would be a substantial cost to the company because of the terrain involved with no environmental benefit.

10.2.1 (p.16) The licensee shall update, 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 within 6 months from date of grant of licence.

Objection to 10.2.1

Basta submitted a detailed CRAMP in Dec'07 completed by WYG Consultants which included a detailed DMP. We will update this document but would request the timeframe be extended from 6 months to 12 months for completion. (See Appendix F)

12.2.2 (p19) The licensee shall arrange for the completion, by an independent and appropriate qualified consultant, of an updated comprehensive and fully costed Environmental Liabilities Risk Assessment (ELRA) which 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 of this assessment shall be submitted to the agency for agreement within 6 months from date of grant of licence. The ELRA shall be reviewed as necessary to reflect and significant change on site, and in any case every three years following initial agreement. Review results are to be notified as part of the AER.

Objection to 12.2.2

We object to a new ELRA report being requested. As identified in 10.2.1 we submitted a detailed CRAMP in Dec'07 completed by WYG Consultants which was based on EPA Guidance Document "ELRA, RMP, FP" and included an ELRA assessment. We would ask that an update of this document with current costs and financials be accepted and the timeframe for submission of same be extended to 12 months as requested in 10.2.1 above due to costs for completion of same. (See Appendix F)

B. I (p21) Emissions to Air

Emission Point Reference No's.: Furnace A2-1

A2-2

Objection to the above changes in B.I Emissions to Air.

The licence P0269-01 noted that 2 furnaces monitoring points exist. The stack A2-2 has been removed from service in a system upgrade in 2001. The EPA has been informed in correspondences on December 2002 of this change. (See Appendix D) . We would request that stack A2-2 reference be removed from our licence.

B.2 Emissions to Water.

Parameter	Emissions Value up to Dec 2015 (mg/L)	Emissions value apply after Dec 2015 (mg/L)	
BOD	20	13	35%Reduction
Ammonia(asN)	10	0.85	91%Reduction
Ortho-Phosphate(as P)	2	0.45	77%Reduction
Nickel	0.5	0.1	80%Reduction
Copper	0.5	0.13	74%Reduction
Cadmium	0.1	0.005	95%Reduction

Objection to the above changes in B.2 Emissions to Water.

We object to the new amended emission limit values.

The emissions values have been lowered substantially with the review of the licence which we believe is unreasonable and without evidence of it being necessary and require justification for same. We have reviewed the current analysis for the last number of years and it is not possible to achieve the targets values set under this new licence (see results in summary chart below for 2012). At this time we are unsure if there is BATNEEC technology available to achieve these new proposed limits from Dec'15.

Our current plant is an efficient Micro Filtration Unit which currently ensures 100% compliance with our current licence (see Appendix I) but will not achieve the proposed limits which will result in the company being non compliant from Dec'15 if there is no BATNEEC technology available to us.

It is also currently fully compliant with Toxicity limits set in our licence (see Appendix H), so we do not understand the necessity or benefit of changing these current limits.

2012 (mg/l)	Ammonia	BOD	Nickel	Copper	
Average per yr	2.52	10.5	0.248	0.279	
% value under 0.1	0% under	100% under	13.1%	2.10%	
% value under 0.2	New limit	New limit	40.7%	27.6%	
% value under 0.3			61.8%	51.0%	
% value under 0.4			84.2%	80.8%	

We are proposing that the limits be set to 0.45 Mg/l for Ortho Phosphates (as P) as suggested.

We are proposing that the limits be set to 5 Mg/l for Ammonia which are achievable.

We are proposing that the limits be set to 15 Mg/l for BOD which are achievable.

We are proposing that the limits be set to 0.05mg/l for Cadmium which are achievable

We are proposing that the limits remain at 0.5mg/l for Nickel which are achievable.

We are proposing that the limits remain at 0.5mg/l for Copper which are achievable.

At this point there is no evidence of current discharges from SW1 having a negative impact on the Tubbercurry river . (See appendix C- Analysis of upstream & down stream of the Tubbercurry river). Basta cannot accept the new limits on "Emissions to Water SW1", because we cannot say if these limits are achievable or if BATNEEC technology is available to achieve these new limits or justification for the changes proposed.

C. 2.3. Monitoring of Storm Water Emissions

Parameter	Monitoring Frequency	Analysis Method
Organic Compounds	Weekly	Standard method

Objection to the above frequency of Monitoring of storm water emission (SD1)

We object to the weekly testing proposed. Analysis has been carried out on this emission point through ground water reports completed on a quarterly basis. The reports have shown that the levels of Zinc and CHC in SD1 have been consistent in the past 2 years. Current analysis of SD1 shows that there is a reduction in the level of zinc from 0.208 in Mar'11 to 0.128 mg/l in Mar'12 (38%) and VOC analysis only exhibit trace amounts of 1.1.1 Trichloroethane & Trichloroethene etc. (See Appendix G)

An increase in testing frequency will incur substantial costs to Basta without any benefit. We request that current quarterly monitoring is maintained until after the completion and implementation of the report required in 6.18. We have agreed in principle with the EPA Inspectorate to complete works and allocate resources to groundwater before concentrating on surface water issues.

Conclusion

We thank you for your time and consideration of our objections and amendment requests. Basta Parsons Ltd is a small Irish owned company in existence since 1955. We have limited resources and Operating in a very difficult economic environment supplying the construction industry. We do not have the manpower or financial resources to carry out all the actions and initiate all the reports / employ consultants, requested in our new licence in the timeframe specified and we would ask you to keep that in mind when considering our objections, but can assure you of our ongoing commitment to the environment and our IPPC Licence. Please refer to the attached summary request for timeframe extension on requested reports / actions where identified in our objections above (Ref Appendix J). If you have any queries don't hesitate to contact us.

Yours sincerely



**Paraic Morrin
Assistant CEO Manufacturing
Basta Parsons Limited**

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