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RESOURCE USE

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

TO:	Directors
FROM:	Technical Committee - LICENSING UNIT
DATE:	20 th February 2013
RE:	Objection to Proposed Determination for Basta Parsons Limited, IPPC Reg: P0269-02

Review 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 30 m ³
Location of activity:	Gallagher Road, Tubbercurry, Co Sligo.
Category of Activity under IPPC Directive (2008/1/EC):	2.6
Category of Activity under IED (2010/75/EU):	2.6
PD issued:	12 th October 2012
First party objection received:	8 th November 2012

Environmental Objectives Regulations Review

Reason for Licence Review

On the 29th of September 2011, the Environmental Protection Agency initiated a review of the IPPC licence held by Basta Parsons Ltd for the installation located at Tubbercurry, Co. Sligo, IPPC licence register number P0269-01.

The reasons for initiating the review are in light of the requirements under the following regulations:

- (1) The European Communities Environmental Objectives (Surface Waters) Regulations 2009; and
- (2) The European Communities Environmental Objectives (Ground Water) Regulations 2010.

Company

Basta Parsons Limited (Ltd) is a manufacturing company that produces window and door furniture. These products are made from zinc and are electro-plate finished with copper, nickel and chrome. The emissions from the installation come from the plating process. There is an onsite Waste Water Treatment Plant (WWTP) which treats waste metals (nickel, chrome and zinc).

Process effluent flowing into the WWTP is pumped to a cylindrical feed tank with a conical base. The pH is adjusted to the optimum range for precipitating the metals out as insoluble complexes. The addition of lime is used to raise the pH. All solids are then fed through a centrifuge and dropped to a containment vessel before removal by a registered contractor. The liquid effluent is pumped through a microfiltration unit, which acts like a sieve and removes any particles remaining in the effluent. The liquid effluent is pH adjusted to meet licence limits before discharging via emission point SW1 to Stream 2. There are two surface water drainage lines from the site (Stream 1 and Stream 2) which collect storm water and treated effluent from the site and flow for 0.4km before discharging to the Tubbercurry River.

Consideration of the Objection

The Technical Committee, comprising of Ann Marie Donlon (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. Technical Committee consulted with OEE inspector Helen Boyce regarding an issue raised.

This report considers the first party objection. No third party objections were received. The main issues raised in the objection are summarised below. However, the original objection should be referred to for greater detail and further expansion of particular points.

First Party Objection

The licensee advises that they are a small Irish owned company in existence since 1955 with limited resources and operating in a difficult economic environment. They do not have the manpower or financial resources to carry out all the actions requested in the new licence in the timeframe specified but are committed to the environment and their licence.

The licensee made 14 points of objection.

A.1. Condition 3.2 Installation notice board

3.2 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.
- 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.

The licensee objects to the timeframe in condition 3.2.1 as it is too short and requests it to be extended to 3 months. The licensee objects to the proposal to display contact details for out of hours as it cannot exclude the public from obtaining contact numbers for reasons other than emergencies. They propose the emergency contact number to be 999 as contact details are kept by the local Garda and fire brigade.

Technical Committee's Evaluation:

The TC considers extending the timeframe by which the notice board shall be installed to three months is acceptable. The TC clarifies that it is a matter for the licensee to establish the appropriate contact as the condition requires the board to show an emergency out of hours contact telephone. The TC has consulted with OEE and it is reasonable that an emergency out of hours contact would be a contact at the installation or a security firm.

Recommendation:

Amend condition 3.2.1 as follows:

3.2.1 The licensee shall, within **three 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.

A.2. Condition 3.11 wind sock

3.11 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.

The licensee objects to installing a wind direction indicator as there are no visible air emissions, no complaints or no issues with odour and is an unnecessary cost.

Technical Committee's Evaluation:

The TC notes that this requirement is not in the current licence. However, there is a significant emission to atmosphere at the installation from a furnace and therefore a wind sock is not only appropriate but is a standard requirement. The TC recommends rewording the condition to provide the licensee with time to install a wind sock.

Recommendation:

3.11 The licensee shall, within **three months of the date of grant of this licence**, **install and** 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.

A.3. Condition 6.10

- 6.10 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.

The licensee objects to the timeframe and request to extend it to 12 months as they propose to update a 2004 report on the waste water treatment plant.

Technical Committee's Evaluation:

The TC considers that this study is critical to meeting proposed emission limit values (ELVs) specified in the PD. The TC is concerned that the condition references BATNEEC and not BAT even though the activity carried on at this installation falls within the scope of the IPPC Directive (2008/1/EC). It is noted that the Agency published in 2008 a BAT Guidance Note on Best Available Techniques for the Surface Treatment of Metals and Plastic Materials. The TC considers that the emphasis should be placed on evaluating BAT applications and implementing the appropriate combination of BAT and this should be completed within the shortest timeframe possible. The TC recommends referencing BAT in the condition and retaining the six month requirement.

Recommendation:

Replace Condition 6.10 with the following wording:

The licensee shall carry out a study of the process effluent treatment system(s) to assess **the application of BAT and the** 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 **BAT** 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.

A.4. Condition 6.11

- 6.11 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.

The licensee objects to this condition and a set time frame work until 6.10 has been completed and if applicable a timeframe would then be agreed.

Technical Committee's Evaluation:

The TC considers that this requirement is conditional on the outcome of the study specified under condition 6.10 above and is also limited by the timeframe by which the proposed ELV's come into force. Consequently the TC recommends retaining the condition and the timeframe of twelve months.

Recommendation: No change.

A.5. Condition 6.14

6.14 Storm Water

- 6.14.1 A visual examination of the storm water discharges at SD1 shall be carried out daily. A log of such inspections shall be maintained.
- 6.14.2 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.
- 6.14.3 The licensee shall have in place a response programme to the achievement or exceedance of trigger level values. This response programme shall include actions proposed to ensure there will be no emissions to surface water of environmental significance.
- 6.14.4 In the establishment of trigger levels, the licensee shall have regard to the *Guidance on the setting of trigger values for storm water discharges to off-site surface waters at EPA IPPC and Waste Licensed Facilities* published by the Office of Environmental Enforcement and, where necessary, and with the agreement of the Agency, revise these trigger levels.

The licensee objects to the increase in frequency from weekly to daily visual inspections as no issues have been identified and this will be an added cost.

The licensee points out that all of condition of 6.14 should be incorporated into condition 6.18 and actioned after the report in 6.18 is complete.

The licensee objects to any storm water exceeding trigger levels requiring to be diverted for retention and suitable disposal as it is not practical but they agree to putting a response programme in place as recommended by the EPA guidance. The licensee acknowledges that there are issues with the storm water discharge (SD1) but they have been prioritising MNA groundwater programme with the agreement of the Agency inspector. The licensee requests a 9 month timeframe as they need to review a previous report and update it before establishing trigger levels. The licensee states that current analysis of SD1 shows there has been a reduction in the level of Zinc and only traces amounts of VOC's.

Technical Committee's Evaluation:

It was reported to the Board at PD stage that elevated levels of zinc and chlorinated hydrocarbons are being detected in the storm water emission at SD1 and the source could be process related or from contaminated groundwater. The TC notes that Agency guidance is now in place in relation to trigger values: *Guidance on the setting of trigger values for storm water discharges to off-site surface waters at EPA IPPC and Waste Licensed Facilities*. Having regard to this guidance, the TC notes that for grab samples, three consecutive exceedances of the warning limit would constitute an incident and require notification. Retention of contaminated storm water is not considered in the guidance as action cannot be taken as soon as the problem occurs with non-continuously monitored parameters such as metals.

In the context of the guidance, the TC is satisfied that a nine month period is suitable for the establishment of the trigger values. The TC recommends rewording condition 6.14.2 to reflect the guidance and increase the timeframe to nine months.

In relation to daily inspections of the storm water, the licensee acknowledges that there is an issue and therefore the TC considers it appropriate that monitoring would increase to daily for the time being. The licensee can request a reduction in monitoring frequency when it is demonstrated that the issue has been resolved.

Recommendation:

Replace condition 6.14.2 with the following:

6.14.2 A licensee shall, within **nine months** of date of grant of this licence, establish suitable trigger levels for zinc and chlorinated hydrocarbons (CHC) in storm water discharges.

A.6. Condition 6.16

6.16 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.

The licensee objects to the increase in frequency from every three years to annually. The licensee points out that they have been compliant over the last 10 years and have no issues or complaints on noise levels.

Technical Committee's Evaluation:

The TC is satisfied to reduce the noise monitoring frequency to the agreed every three years.

Recommendation:

Replace Condition 6.16 with the following:

6.16 Noise

The licensee shall carry out a noise survey of the site operations **every three years**. 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.

A.7. Condition 6.18

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 SD1 (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.

The licensee requests an extension of time frame from 3 months to 9 months and that condition 6.14 be incorporated into 6.18 as outline in the objection to 6.14 above.

Technical Committee's Evaluation:

It was reported to the Board at PD stage that elevated levels of zinc and chlorinated hydrocarbons are being detected in the storm water emission at SD1 and the source could be process related or from contaminated groundwater. The TC notes the following from the *Guidance on the setting of trigger values for storm water discharges to off-site surface waters at EPA IPPC and Waste Licensed Facilities*,

'To address storm water contamination in older sites, blow out/ clean down of the storm water system, including any associated sumps or tanks by an approved contractor may be an option. Following such action, if the issue is unresolved then sources should be the focus of the investigation.'

The TC considers that the guidance should be followed and this clean -up action should take place initially followed by a more detailed investigation of any on-going source, if necessary. The TC recommends rewording the condition to require a clean down within 3 months and an investigation if contamination continues. On-going contamination will constitute an incident which will require remedial actions and reporting. Therefore the TC recommends deleting the last two sentences of the condition.

Recommendation:

Amend condition 6.18 to read as follows:

6.18 **The licensee shall, within three months from date of grant of licence, carry out a blow out/ clean down of the storm water system, including any associated sumps or tanks by an approved contractor. If storm water contamination continues in that it exceeds the trigger levels set for storm water emissions under 6.14, the licensee shall carry out an investigation to identify the nature, source and cause of the zinc and chlorinated hydrocarbon contamination at SD1 (storm water emission point).**

A.8. Condition 6.19

6.19 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 22nd December 2015.

The licensee objects to the relocation of the final discharge point to the Tubbercurry River as a 2004 study confirmed that the current discharge point had no negative impact on the surrounding area and do not see the necessity of the change. The licensee advises that this would be a substantial cost with no environmental benefit. Effluent volumes have reduced, toxicity tests are compliant and river results show a reduction in some analysed substances.

Technical Committee's Evaluation:

The TC notes that it was reported to the Board at PD stage that the process effluent discharged to a stream which flowed into the Tubbercurry River approximately 400m downstream. The installation is bordered by the Tubbercurry River to the north of the site. Process effluent from the installation is characterised by metals which tend to be insoluble in water and will drop out to the sediment of the stream. This stream does not have any assimilative capacity due to its magnitude and the TC do not

consider it appropriate to discharge this process effluent to this stream due to the likely consequential contamination of stream sediment. The TC notes that the company are a small firm but the condition provides just under three years to lay a pipeline to the Tubbercurry River within their own site boundary. On that basis, the TC recommends that the final discharge point should be relocated to the Tubbercurry River.

Recommendation: No change.

A.9. Condition 10.2.1

10.2.1 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 for agreement within six months from date of grant of licence.

The licensee requests the timeframe to be extended from 6 months to 12 months as a detailed CRAMP was submitted in December 2007.

Technical Committee's Evaluation:

In the context of the requirement for other reports to be completed, the TC is satisfied to extend the timeframe to twelve months for an updated Decommissioning Management Plan.

Recommendation:

Replace condition 10.2.1 with the following:

10.2.1 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 for agreement within **twelve months** from date of grant of licence.

A.10. Condition 12.2.2

12.2.2 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 addresses 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 six months from date of grant of 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. Review results are to be notified as part of the AER.

The licensee objects to a new ELRA report as an ELRA assessment was submitted with the CRAMP in December 2007. The licensee requests that the timeframe for submission of an update of this document be extended to 12 months.

Technical Committee's Evaluation:

In the context of the requirement for other reports to be completed, the TC is satisfied to extend the timeframe to twelve months for an ELRA.

Recommendation:

Replace condition 12.2.2 with the following:

12.2.2 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 addresses 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** from date of grant of 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. Review results are to be notified as part of the AER.

A.11. Schedule B.1 Emissions to Air in relation to A2-2

The licensee requests stack A2-2 is removed from the licence as A2-2 has been removed in a system upgrade. The Agency was informed in correspondence in December 2002.

Technical Committee's Evaluation:

The TC acknowledges that A2-2 has been removed and recommends the licence should take account of this.

Recommendation:

Remove reference to A2-2 from the Schedule B.1 so as it will read as follows;

B.1 Emissions to Air

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

Location : Process building

Volume to be emitted: Maximum in any one day (each): 45,000 m³
Maximum rate per hour (each): 6,000 m³

Minimum discharge height: Furnace A2-1: 10 m above ground

Parameter	Emission Limit Value ^(Note 1)
TA Luft Inorganic Dust Class I	0.2 mg/m ³ (at mass flows >1 g/hr.)
TA Luft Inorganic Dust Class II	1.0 mg/m ³ (at mass flows >5 g/hr.)
TA Luft inorganic Dust Class III	5.0 mg/m ³ (at mass flows >25 g/hr.)

Note 1: Where inorganic dust substances of several classes are emitted simultaneously, in addition to the above individual limits, the sum of the concentrations of Classes I, II and III shall not exceed the Class III limits.

A.12. Schedule B.2 Emissions to Water in relation to SW1

The licensee objects to the lowering of emission limit values (ELV's) as they are not justifiable or reasonable. The licensee advises that the target values are not possible to achieve and are unsure if BATNEEC technologies are available to achieve these new proposed limits from December 2015. The current plant is a microfiltration unit which ensures 100% compliance with current limits. There is no evidence that the current discharge is having a negative impact on the Tubbercurry River. The licensee requests a limit of 5mg/l ammonia, 15mg/l BOD, 0.05mg/l Cd, 0.5mg/l Ni and 0.5mg/l Cu.

Technical Committee's Evaluation:

The TC notes from the documentation submitted in support of the objection that the capacity of the treatment plant is 8m³/hr and not 12m³/hr.

The environmental quality standards specified in the EC EO (surface waters) regulations 2009, as amended for copper (specific pollutant), nickel (priority substance) and cadmium (priority hazardous substance) are annual average concentration values of filtered samples (0.45µm).

The microfiltration unit membrane pore size range is from 0.1 to 10µm. Although, it is not specifically stated in the review documentation, it is taken that the monitoring data is based on whole sample and not filtered samples. The TC note from BREF on surface treatment of metals and plastics that the emission levels associated with BAT are as follows; Copper and Nickel: 0.2 to 2.0mg/l and Cadmium: 0.1 -0.2mg/l.

The TC notes that the assimilative capacity of the Tubbercurry River is limited and that the normal discharge from the installation is 60m³/day and not 200m³/day (maximum limit). In light of the foregoing and having regard to BAT, the TC recommends retaining the existing limits for metals but requiring quarterly monitoring of the Tubbercurry River to ensure compliance with the EQS's.

The TC are not clear as to the source of ammonia and BOD as these substances are not typically a characteristic of waste water from surface treatment and the sanitary effluent is discharged to sewer. The TC considers that the licensee should investigate sources of ammonia and BOD and divert these waste water streams for appropriate treatment prior to 22nd December 2015 and should be part of the requirements under Condition 6.10 as discussed under A.3 above. The TC considers that the assimilative capacity of the Tubbercurry River for this discharge was assessed and appropriate ELV's were determined for BOD and ammonia at the PD stage.

The TC recommends that the hourly discharge should be reduced to 8m³/hr and the daily rate reduced to 192m³/hr in line with the capacity of the plant. The TC recommends retaining the post-dated ELVs for BOD and ammonia and removing those post-dated ELV's for copper, nickel and cadmium but requiring ambient monitoring of the Tubbercurry River.

Recommendation:

Replace Schedule B.2 Emissions to Water with the following Schedule:

B.2 Emissions to Water

Emission Point Reference No: SW1
 Name of Receiving Waters: Tubbercurry River
 Location: Discharge at lowest point of weir
 Volume to be emitted: Maximum in any one day: 192 m³
 Maximum in any one hour: 8m³

Parameter	Emission Limit Value	
Temperature	25 °C (max) ^{Note 1}	
pH	6 - 9	
Toxicity	5 TU	
	Emission limit values will apply until the 22 nd December 2015 (mg/l)	Emission limit values will apply after the 22 nd December 2015 (mg/l)
BOD	20	13
COD	100	100
Suspended Solids	30	30
Fats, Oils and Greases	20	20
Nitrates (as N)	15	15
Ammonia (as N)	10	0.85
Ortho-phosphate (as P)	2	0.45
Cyanide (mg/l)	0.05	0.05
Zinc	0.5	0.5
Nickel	0.5	0.5
Copper	0.5	0.5
Chromium VI	0.1	0.1
Cadmium	0.1	0.1

Note 1: Subject to Condition 5.5 of this licence

Recommendation:

Insert under Schedule C.6 Ambient Monitoring the following table for receiving water monitoring:

C.6 Ambient Monitoring

Receiving Water Monitoring

Location: Upstream and downstream of discharge to the Tubbercurry River at locations to be agreed by the Agency.

Parameter	Monitoring Frequency	Analysis Method/Techniques ^{Note 1}
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pH	Quarterly	pH electrode/meter
Total Heavy Metals	Quarterly	Standard Method
Zinc	Quarterly	Atomic Absorption / ICP
Nickel	Quarterly	Atomic Absorption / ICP
Copper	Quarterly	Atomic Absorption / ICP
Total Chromium	Quarterly	Atomic Absorption / ICP
Cadmium	Quarterly	Atomic Absorption / ICP

Note 1: In the case of cadmium, chromium VI, nickel, copper and zinc, water samples analysed are for dissolved metals i.e. after filtration through a 0.45 micron filter.



A.13. Schedule C.2.3 Monitoring of Storm Water Emissions in relation to SD1

The licensee objects to the weekly testing proposed as it will incur substantial costs without any benefit. The licensee advises that reports have shown that the levels of zinc and CHC in SD1 have been consistent in the past 2 years. Current analysis show a reduction in the level of zinc and only trace amounts of VOCs. The licensee requests quarterly monitoring until after the completion and implementation of the report required in condition 6.18. The licensee advises that they have agreed in principle with the EPA inspectorate to complete works and allocate resources to groundwater before concentrating on surface water issues.

Technical Committee's Evaluation:

The TC notes that it was reported to the Board at PD stage that the frequency was increased to weekly due to concerns about contamination at SD1. Under objection A.7 above the TC recommend an immediate clean-up of the storm water system. In the context of this requirement, the TC considers that fortnightly monitoring for zinc and organic compounds would suffice. The licensee can request a reduction in frequency when results demonstrate that the issue has been resolved. The TC recommends a reduction in frequency to fortnightly.

Recommendation:

Change monitoring frequency in Schedule C.2.3 as follows:

C.2.3. Monitoring of Storm Water Emissions

Emission Point Reference No: SD1

Parameter	Monitoring Frequency	Analysis Method/Technique
pH	Bi-annually	Standard method
COD	Bi-annually	Standard method
Nickel	Bi-annually	Standard method
Copper	Bi-annually	Standard method

Chromium	Bi-annually	Standard method
Chromium VI	Bi-annually	Standard method
Cadmium	Bi-annually	Standard method
Total Heavy Metals	Bi-annually	Standard method
Zinc ^{Note 1}	Fortnightly	Standard method
Organic Compounds ^{Note 1&2}	Fortnightly	Standard method
Conductivity	Bi-annually	Standard method
Visual Inspection	Daily	Sample and examine for colour and odour.

Note 1: The licensee can request a reduction in frequency when it is demonstrated that the storm water is uncontaminated.

Note 2: Screening for priority pollutant list substances (such as US EPA volatile and/or semi-volatile compounds). This analysis shall include those organic solvents in use in the process, in particular trichloroethylene and breakdown products. The licensee can request a reduction in frequency when it is demonstrated that the storm water is uncontaminated.

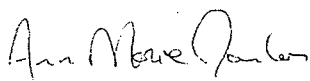


Overall Recommendation

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

- (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



Ann Marie Donlon
for and on behalf of the Technical Committee

