

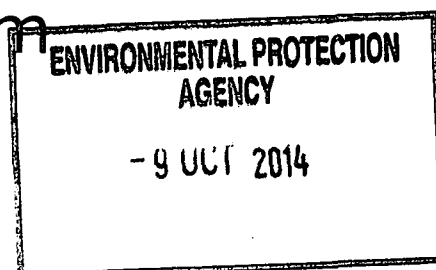


WARNING: IF YOUR ACTIVITY FALLS UNDER THE  
**INDUSTRIAL EMISSIONS DIRECTIVE 2010/75/EU**  
**DO NOT USE THIS FORM**  
PLEASE REFER TO THE ENVIRONMENTAL PROTECTION AGENCY  
(INDUSTRIAL EMISSIONS) (LICENSING) REGULATIONS 2013, S.I.  
137 OF 2013  
AND  
THE EUROPEAN UNION (INDUSTRIAL EMISSIONS)  
REGULATIONS 2013, S.I. 138 OF 2013  
CONTACT THE ENVIRONMENTAL LICENSING PROGRAMME FOR  
FURTHER INFORMATION

# Integrated Pollution Control (IPC) Licensing

## Application Form

<b>EPA Reg. N<sup>o</sup>:</b> (Office use only)	<input type="text"/>
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**Environmental Protection Agency**  
P.O. Box 3000, Johnstown Castle Estate, Co. Wexford  
Lo Call: 1890 335599 Telephone: 053-9160600 Fax: 053-9160699  
Web: [www.epa.ie](http://www.epa.ie) Email: [info@epa.ie](mailto:info@epa.ie)

**Tracking Amendments to Application Form**

<b>Version No.</b>	<b>Date</b>	<b>Amendment since previous version</b>	<b>Reason</b>
V.1.	2013	N/A	

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## ABOUT THIS APPLICATION FORM

This form is for the purpose of making an application for an Integrated Pollution Control (IPC) Licence under the Environmental Protection Agency Act, 1992, as amended.

The Application Form **must** be completed in accordance with any guidance given by the Agency. The application form is available to download from the IPC Licensing pages of the EPA's website at [www.epa.ie](http://www.epa.ie). A valid application for an IPC licence must contain the information prescribed in the Environmental Protection Agency (Integrated Pollution Control) (Licensing) Regulations 2013. Regulation 9 of the Regulations sets out the statutory requirements for information to accompany a licence application. The application form is designed in such a way as to set out these questions in a structured manner and not necessarily in the order presented in Regulation 9. In order to ensure a legally valid application in respect of Regulation 9 requirements, please complete the Regulation 9 Checklist provided in Annex 2.

This Application Form does not purport to be and should not be considered a legal interpretation of the provisions and requirements of the Environmental Protection Agency Act, 1992, as amended, and the Environmental Protection Agency (Integrated Pollution Control) (Licensing) Regulations 2013. While every effort has been made to ensure the accuracy of the material contained in the Application Form, the EPA assumes no responsibility and gives no guarantees, undertakings and warranties concerning the accuracy, completeness or up-to-date nature of the information provided herein and does not accept any liability whatsoever arising from any errors or omissions.

Should there be any contradiction between the information requirements set out in the Application Form and any clarifying explanation contained in Agency guidance, then the requirements in this Application Form shall take precedence.

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## SECTION A: NON-TECHNICAL SUMMARY

A non-technical summary of the application is to be included here. The summary should identify all environmental impacts of significance associated with the carrying on of the activity/activities, and describe mitigation measures proposed or existing to address these impacts. This description should also indicate the normal operating hours and days per week of the activity.

The following information must be included in the non-technical summary:

A description of:

- the installation and its activities,
- the raw and ancillary materials, other substances and the energy used in or generated by the installation,
- the sources of emissions from the installation,
- the environmental conditions of the site of the installation (e.g. soil and groundwater, air, noise, surface water),
- the nature and quantities of foreseeable emissions from the installation into each medium as well as identification of significant effects of the emissions on the environment,
- the proposed technology and other techniques for preventing or, where this is not possible, reducing emissions from the installation,
- where necessary, measures for the prevention and recovery of waste generated by the installation,
- Do each heading above with short descriptions of C&P and rubber biggest wastes

### The Installation and its activities

G.BRUSS GmbH DICHTUNGSTECHNIK Sligo is a German owned manufacturer of synthetic rubber seals to the automotive industry. The company has been in operation at its Sligo site since 1982 and currently employs 300 people. G.BRUSS Sligo produces exclusively for the export market, supplying product to the OEM's FORD, Daimler, VW, GM in Europe, North America and Asia.

G.BRUSS holds an existing Integrated Pollution Control Licence (PO465-01). This application relates to a new process, 'Gleitmo Coating' that is being introduced at the site and which has resulted in the requirement to revise the existing licence. **Section B.10** and **Section D** of the application present details on the new process and requirement for review of the existing licence.

The production process at G. BRUSS involves the conversion or moulding of pre-manufactured elastomer into precision engine seals of various dimensions and geometry. The elastomer is manufactured and supplied to the company by the BRUSS Headquarters plant in Hamburg Germany.

The manufacturing process involves both compression and injection moulding. There are a number of finishing processes after moulding which give the product its final properties.

(1) Cryogenic Shotblasting / Deflashing – parts are frozen in Nitrogen and blasted with plastic shot media to produce a refined finish

(2) Tempering – post cure – parts receive a number of hours in tempering ovens to complete vulcanization and give final properties

(3) Autovision and manual inspection - both manual inspection and inspection of product with optical lenses to ensure quality reaches the customer.

**Attachment A.1** includes **Application Form Map 1** –Site boundary/Site Plan and **Application Form Drawing 5** indicating the location of the site and the plan of activities on site. A G.BRUSS Production Synopsis is included in **Attachment D.1**

### Raw and Ancillary Materials used

Primary raw materials used are various rubber compounds, ACM, AEM, FPM, NBR, HNBR and EPDM, that are produced at BRUSS headquarters. Bulk storage liquid nitrogen is used within the manufacturing process.

Hydraulic Oils are required on site for the operation of production machinery.

Chemical usage includes caustic cleaner for mould cleaning, water based mould release sprays, and various coatings applied to rubber product as a means of lubrication.

A comprehensive list of raw and ancillary materials used on site is included in **Table G.1 (i)** and **Table G.1(ii)**.

### Energy Usage

#### Electricity

Electricity is used to power all moulding and finishing process machinery on site. As part on ongoing process improvement and environmental awareness G.BRUSS is actively involved in programmes to reduce energy consumption and employ clean and more efficient technology were it is feasible to do so. A reduction in electricity consumption of 20.4 % of has been achieved since 2012. **Table 1 in section A** presents an overview of activities which have contributed to this change over a number of years.

#### Nitrogen

Nitrogen is used on site as the medium by which the processes of shotblasting and deflashing are carried out. Shotblasting is necessary to achieve a flash free finish on rubber parts. In recent years G.BRUSS has been able to eliminate the cryogenic deflashing process on particular part numbers as a result of a new mould design technique. Reduction in Nitrogen usage of 5.8 % has been achieved by since 2012 as a result of new mould design initiatives.

#### Fuel

G.BRUSS currently uses fuel oil to power 3 off minor boiler units for heating spaces in Dispatch and maintenance areas during the winter months. Fuel usage in 2013 amounted to 10,176 ltrs and showed an increase of 64% on usage in 2012, 6,195 ltrs. In quarter 4 of 2014, a replacement of the fuel boilers is planned. This will be achieved through a heat exchange system connected to a new air compressor unit. The boilers will remain in place for standby

use. It is envisaged that the heat exchange system will fulfil the heating requirements in these areas and that fuel oil consumption will be significantly reduced or eliminated.

Energy consumption and reduction activities are presented in **Section G**.

### **Municipal Water Usage**

The main source of water consumption at G. BRUSS processes of washing. A wash process using water with ceramic stone removes excess flash may be required parts showing issues with tool wear. Parts are additionally rinsed in clear water to remove ambient dust before packaging and dispatch. This is an OEM customer driven requirement that monitors sediment levels on incoming parts. Other water usage on site is sanitary and canteen usage.

### **Environmental Management Programme (EMP)**

G. BRUSS is working toward objectives set out in its Environmental Management Programme 2012 – 2015.

Objectives are reviewed at the company's management review which is scheduled biannually. Environmental objectives are set in conjunction with engineering and production activities to ensure that sustainable cross-functional objectives are selected and monitored, and that there is environmental focus involved from the start of every project.

**Attachment G** includes a copy of G. BRUSS EMP 2012-2015

further measures planned to comply with the general principles of the basic obligations of the operator i.e.

- (a) all the appropriate preventive measures are taken against pollution, in particular through application of the Best Available Techniques (BAT);
- (b) no significant pollution is caused;
- (c) waste production is avoided in accordance with the waste hierarchy in Council Directive 98/2008/EC on waste and section 21A of the Waste Management Act 1996, as amended; where waste is produced, it is prepared for re-use, recycled or recovered or, where that is technically and economically impossible, it is disposed of while avoiding or reducing any impact on the environment (applicants should provide this information in the context of sections 29(2A), 32 and 38(5A) of the Waste Management Act 1996, as amended);
- (d) energy and other resources are used efficiently;
- (e) the necessary measures are taken to prevent accidents and limit their consequences;
- (f) the necessary measures are taken upon definitive cessation of activities to avoid any pollution risk and return the site of operation to a satisfactory state.

– measures planned to monitor emissions into the environment

Emissions to the environment are monitored and reported in accordance with the conditions of G. BRUSS IPC License No. PO4650-01. G. BRUSS maintains its processes through an environmental management system

G.Bruss GmbH is actively engaged in activities to increase efficiency in energy usage, in materials consumed and to reduce waste generation by its processes. Detail of a process improvement activities regarding (a) to (f) can be found in the individual sections to follow.

Supporting information should form **Attachment N<sup>o</sup> A.1** includes copy of **Application Form Map 1** –Site boundary/Site Plan and **Application Form Drawing 5** indicating the location of the site and the plan of activities on site. **Application form Drawing 1** Site Ownership

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**SECTION B: GENERAL**

**B.1. Owner/Operator**

<b>Name*:</b>	G.Bruss GmbH, DICHTUNGSTECHNIK
<b>Address:</b>	Finisklin Road
	Sligo
<b>Tel:</b>	00353719156300
<b>Fax:</b>	00353719169352
<b>e-mail:</b>	info@bruss.ie

\* This should be the name of the applicant which is current on the date this IPC Licence Application is lodged with the Agency. It should be the name of the legal entity (which can be a limited company or a sole trader). A trading/business name is not acceptable.

**Name and Address for Correspondence**

Only application documentation submitted by the applicant and by the nominated person will be deemed to have come from the applicant.

<b>Name:</b>	Ms Anna Garvey
<b>Address:</b>	Finisklin Road
	Sligo
	Co. Sligo
<b>Tel:</b>	00353719156342
<b>Fax:</b>	00353719169352
<b>e-mail:</b>	annagarvey@bruss.ie

**CRO No. and address of registered or principal office of Body Corporate (if applicable)**

<b>CRO No.</b>	HRB 137
<b>Address:</b>	DICHTUNGSTECHNIK G.Bruss GmbH & Co KG
	D-22955 Hoisdorf
	Hamburg
	Germany
<b>Tel:</b>	0049417059-0
<b>Fax:</b>	0049410759-101
<b>e-mail:</b>	info@bruss.de

If the applicant is a body corporate, the following information must be attached as **Attachment B1**:

- a) a Certified Copy of the Certificate of Incorporation.
- b) the Company's Registration Number from the Companies Registry Office.
- c) Particulars of Registered Office of the Company.

Attachment B1: includes (a) (b) (c)

Name and address of the proprietor(s) of the Land on which the Activity is situated (if different from applicant named above):

<b>Proprietor's Name:</b>	As above
<b>Address:</b>	
<b>Tel:</b>	
<b>Fax:</b>	
<b>e-mail:</b>	

Name and address of the owner(s) of the building and ancillary plant in which the activity is situated (if different from applicant named above):

<b>Name:</b>	As above
<b>Address:</b>	
<b>Tel:</b>	
<b>Fax:</b>	
<b>e-mail:</b>	

Name and address of the primary installation contact for enforcement purposes, where a licence is granted (if different from applicant named above):

<b>Name:</b>	Ms Anna Garvey
<b>Position in organisation:</b>	Environmental Manager
<b>Address:</b>	Finisklin Road Sligo
<b>Tel:</b>	00353719156342
<b>Fax:</b>	00353719169352
<b>e-mail:</b>	annagarvey@bruss.ie

**B.2. Location of Activity**

<b>Name:</b>	G.Bruss GmbH, DICHTUNGSTECHNIK
<b>Address*:</b>	Finisklin Road Rathedmond * Sligo Co. sligo
<b>Tel:</b>	00353719156300
<b>Fax:</b>	00353719169352
<b>Contact Name:</b>	Ms Anna Garvey
<b>Position:</b>	Environmental Manager
<b>e-mail:</b>	annagarvey@bruss.ie

\* Include any townland.

<b>National Grid Reference (12 digit 6E,6N)</b>	E168460, N336322
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Location maps ( $\leq A3$ ), appropriately scaled, with legible grid references should be enclosed in **Attachment B.2**. The site boundary must be outlined on the map in colour.  
Application Form Drawing 2 Site Location included in attachment B.2

Geo-referenced digital drawing files (e.g. AutoCAD files) in Irish Grid projection of the site boundary and overall site plan, including labelled emission, monitoring and sampling points, are also required. This data should be provided to the Agency on a separate CD-Rom containing sections B.2, E.6 and F.3.

Digital Drawings as detailed below provided on CD-ROM

<b>Name of geo-referenced digital drawing files</b>	Application Form Map1 Site Boundary/Site Plan (DWG) Application Form Map2 Emission Points Air, Sewer (DWG) Application Form Map3 Emission Points Noise (DWG) Application Form Map4 Monitoring and Sampling Points Air, Sewer, Noise (DWG) Application Form Map 5 Site Location (DWG)
<b>Name of CD-Rom with digital drawing files</b>	G.Bruss GmbH Finisklin Road Sligo- IPC Review 18.09.14-DWG Files Sections B2,E6 F3

### B.3. Class of Activity

Identify the relevant activities in the First Schedule of the EPA Act 1992, as amended, to which the activity relates:

Schedule	Class	Description <sup>Note 1</sup>
Schedule 1	5.7	'..the manufacture of Elastomers where production capacity exceeds 1,000 litres per week'

**Note 1:** In order to give a precise identification **select only those words** from the description of the class or classes that best describes the nature of the activity for which the licence is being applied for.

State whether the installation falls under the scope of Chapters IV (waste incineration plants and waste co-incineration plants) and/or V (installations and activities using organic solvents) of the Industrial Emissions Directive (2010/75/EU) and if yes specify the relevant sections and Annex.

<b>IED Chapter(s) and relevant Annex(es)</b>
G. Bruss GmbH does not fall under the scope of Chapter IV (Waste incineration plants, waste co-incineration plants) of the IED (2010/75/EU)
Chapter V (installations and activities using organic solvents ) of the IED (2010/75/EU ) transposed by S.I 565 / 2012 <ul style="list-style-type: none"> <li>• Scope (2) (3)</li> <li>• Regulation 9 (1) (2) Substitution of Hazardous Substances</li> <li>• Regulation 10 (5) (6) Control of Emissions</li> <li>• Schedule 4 ELV for VOC Compounds with Specific Risk Phrases</li> </ul>

The following table summarises the risk phrases associated with the constituent substances, K1,K2,K3, present in 'Gleitmo' coating, which are applicable to S.I. 565 2012 and Chapter V, IED (2010/75/EU) . Gleitmo coating is the subject of this application.

Substance name	CAS No	Chemical Composition	Risk Phrase	Relevant Section of S.I 565/2012
K1	64742-48-9	Mixture of Hydrocarbons, de-aromatized	No applicable risk phrase	
	1330-20-7	Xylene		
K2	67-63-0	Propan-2-ol	No applicable risk phrase	
K3	77-58-7	Dibutylzinndilaurat (Dibutyltin)	60, 61, 68	Reg. 9 (1) (2) Reg. 10 (5) (6) Schedule 4

Table 1 S.I.565/2012 Relevant Risk Phrases

Emission levels of target VOC Dibutyltin are presented and discussed in **Section E**.

Supporting information should be included in **Attachment N° B.4**.

**Attachment B.3** includes Material Safety Data Sheets of K1, K2, K3 the individual substances which are present in the 'Gleitmo' coating.

#### **B.4. Employees/ Capital Cost**

Give-

- (i) In the case of an established activity, the number of employees and other persons working or engaged in connection with the activity on the date after which a licence is required and during normal levels of operation, or
- (ii) In any other case, the gross capital cost of the activity to which the application relates.

<b>Number of Employees (existing facilities):</b>	300
<b>Gross Capital Cost (new proposals) €</b>	€ 30,000

### B.5. Relevant Planning Authority and/or Public Authority

Give the name of the planning authority in whose functional area the activity is or will be carried out.

<b>Name:</b>	Sligo County Council Planning
<b>Address:</b>	County Hall
	Riverside
	Sligo
	Co. Sligo
<b>Tel:</b>	071-9111206 / 071-9111212
<b>Fax:</b>	071-9138054

Planning Permission relating to this application:

<b>B.5.(a) is not required</b>	<input checked="" type="checkbox"/>
<b>B.5.(b) has been obtained</b>	<input type="checkbox"/>
<b>B.5.(c) is being processed</b>	<input type="checkbox"/>

<b>Local Authority Planning File Reference N<sup>o</sup>:</b>	<b>ED 182</b>
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### Attachment B.5.

#### B.5(a) Planning permission not required

Where **the new activity or changes to the existing activity which require this licence/review application** does not require a grant of planning permission, the following should be included in **Attachment N<sup>o</sup> B.5**:

- Confirmation in writing from the planning authority or An Bord Pleanála, as the case may be, that a grant of permission is not required,
- A Planning Exemption Application, under Section 5 of Planning and Development Act 2000 (as amended), was submitted to the planning authority for the construction of housing unit and venting stack, proposed A2-5 VOC emission point. Planning exemption was obtained from planning authority.
- **Attachment B.5** Written confirmation of Planning Exemption from Sligo Co.Co. Planning.

#### **AND**

- Details of previous planning permissions granted for the development comprising the activity, including a copy of the grant of permission and a copy of all conditions.

**Attachment B.5** includes a summary list of all previous planning permissions obtained for the site together with a copy of grant of permission and all conditions. Previous Planning permissions, with one exception in 2011, pre-date the Planning & Development Act 2000.

#### **AND EITHER**

- (a) Where the planning authority or An Bord Pleanála accepted or required the submission of a copy of an EIS under the Planning and Development Act 2000, as amended, for a previous planning permission application, the required number of

copies of the most recent EIS should be submitted. A copy of the planning inspector's report associated with that EIS should also be submitted.

**OR**

- (b) Where an EIS was not required for any previous planning permissions granted for the development comprising the activity, submit confirmation in writing from the planning authority or An Bord Pleanála that an environmental impact assessment was not required for the development by or under the Planning and Development Act 2000, as amended.

Planning permissions granted to G. Bruss, with the exception of one grant of permission in 2011, pre-date the Planning and Development Act 2000. The planning permission obtained in 2011 did not require an EIS or an Environmental Impact Assessment. **Attachment B.5** includes written confirmation from Sligo Co. Co. Planning that an Environmental Impact Assessment was not required.

- Where a grant of planning permission has never been required for the site of the activity, submit confirmation in writing from the planning authority or An Bord Pleanála, as the case may be, of same.

*B.5(b) Planning permission already granted*

Where **the new activity or changes to the existing activity which require this licence/review application** has already been granted planning permission by a planning authority or An Bord Pleanála, the following should be included in **Attachment N<sup>o</sup> B.5**:

- a copy of the grant of permission and either:
  - (a) where the planning authority or An Bord Pleanála accepted or required the submission of a copy of an EIS under the Planning and Development Act 2000, as amended, the required number of copies of that EIS;

**OR**

- (b) confirmation in writing from the planning authority or An Bord Pleanála that an environmental impact assessment was not required for the development by or under the Planning and Development Act 2000, as amended.

- A summary of all previous planning permissions granted for the site of the activity should be provided.

**B.5(b)** This section is not applicable

*B.5(c) Planning permission under consideration*

Where **the new activity or changes to the existing activity which require this licence/review application** involves development or proposed development that requires a grant of planning permission, and the relevant planning application is under consideration by the planning authority or An Bord Pleanála, the following should be included in **Attachment N<sup>o</sup> B.5**:

- confirmation in writing from a planning authority or An Bord Pleanála, as the case may be, that an application for permission comprising or for the purposes of the activity to which the application for a licence relates, is currently under consideration, and either:

- (a) the required number of copies of the EIS relating to that application for permission, where one is required by or under the Planning and Development Act 2000, as amended;

**OR**

- (b) confirmation in writing from the planning authority or An Bord Pleanála that an environmental impact assessment is not required by or under the Planning and Development Act 2000, as amended.

- A summary of all previous planning permissions granted for the site of the activity should be provided.

**B.5 (c)** This section is not applicable

For B.5(b) and B.5(c) above, please note that in accordance with Section 87(1C) of the EPA Act 1992, as amended, the Agency shall **refuse to consider** the licence application if the applicant does not comply with the requirements of Section 87(1B).

Licences and permits

For existing activities, **Attachment N<sup>o</sup> B.5** should also contain a table of references to all licences and permits past and presently in force at the time of submission.

Prior to granting of IPC Licence PO465-01 in 2000, the company did not hold any previous permit or licence. IPC Licence No : PO465-01 is the only licence / permit held by the company. For information purposes, attached is a response to an historical query from G.Bruss to Sligo local authority on the need for licence/permits

**Attachment B.5** – includes Table of reference to licences / permits held., **Letter of response to G. Bruss** query on licence/permit.

Appropriate Assessment

Where applicable, provide a copy of any screening for Appropriate Assessment report and Natura Impact Statement (NIS) that was prepared for consideration by any planning/public authority as defined in Regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011) in relation to the activity. Where a determination that an Appropriate Assessment is required has been made by any planning/public authority in relation to the activity, a copy of that determination and any screening report and Natura Impact Statement (NIS), and any supplemental information furnished in relation to any such report or statement, which has been provided to the planning/public authority for the purposes of the Appropriate Assessment shall be included in **Attachment N<sup>o</sup> B.5**. **This section is not applicable.** No Attachment

**B.6. Relevant Water Services Authority**

In the case of a discharge of any trade effluent or other matter to a sewer of a Water Services Authority, give the name of the Water Services Authority in which the sewer is vested or by which it is controlled.

<b>Name:</b>	Sligo County Council (on behalf of Irish Water)
<b>Address:</b>	County Hall
	Riverside
	Sligo
	Co. Sligo

<b>Tel:</b>	071-9111206 / 071-9111212
<b>Fax:</b>	071-9138054

In the case of a discharge of any trade effluent or other matter to a sewer not vested by a Water Services Authority, the applicant must supply as **Attachment N° B.6**; (a) the name and address of the owner(s) of the sewer and the waste water treatment plant to which the sewer discharges and who are responsible for the quality of the treated effluent discharging to waters and (b) a copy of the effluent regulations and the agreement between the applicant and the aforementioned. **Attachment B.6 is not applicable**

<b>Name:</b>	Not applicable
<b>Address:</b>	
<b>Tel:</b>	
<b>Fax:</b>	

### B.7. Relevant Regional Health Service Executive

The applicant should indicate the Regional Health Service Executive where the activity is or will be located.

<b>Name:</b>	HSE West
<b>Address:</b>	Community Services
	Markievicz House
	Barrach Street
	Sligo
<b>Tel:</b>	071-9155100
<b>Fax:</b>	

### B.8 Site Notice, Newspaper Advertisement and Planning Authority Notice.

**Attachment N° B.8** should contain a copy of the text of the site notice, a map (no larger than A3) showing its location on site (in accordance with Regulation 6 of the Regulations) and a copy of the newspaper advertisement. A copy of the notice given to the Planning Authority should also be included.

**Attachment B.8** includes copy of Newspaper advertisement, site notice, Application Form Drawing 3- Site Notice Location and notice provided to the planning authority.

### B.9 Seveso II Regulations

State whether the activity is an establishment to which the EC (Control of Major Accident Hazards involving Dangerous Substances) Regulations (S.I. No. 74 of 2006) apply.

If yes, outline how the process comes under these regulations.

Supporting information should be included in **Attachment N° B.9**.

The Seveso II Regulations (S.I. No. 74/2006) are not applicable to the activities of G. BRUSS GmbH



**Attachment No. B.9 – No attachment**

**B.10 Review of a licence**

State the grounds on which an application for a review of a licence is being made and give the reference number to the relevant licence in the register.

This application for a review of Licence No. PO465-01 G.BRUSS GmbH, requests permission to operate a new product coating process 'Gleitmo Coating'. This process will give rise to an emission to atmosphere of VOC.

G. BRUSS consulted with the Office of Environmental Enforcement, Castlebar to determine if this emission to atmosphere could be approved as an addition to currently licensed rubber fume stack point emissions to atmosphere. It is the consideration of the OEE that this process cannot be accommodated within the scope of our existing Licence. Confirmation letter from OEE is included in **Attachment B.10**

Provide a copy of the Office of Environmental Enforcement (OEE) correspondence that indicates that the reason for the review cannot be accommodated within the scope of the existing licence.

Where the OEE of the Agency has agreed any variations or adjustments to the conditions or schedules of the existing licence, the licensee must provide details of these agreed variations and adjustments to the existing licence conditions. An updated, scaled drawing of the site layout (no larger than A3) providing visual information on such adjustments or variations where appropriate should be included.

In the case of once-off assessments/ reports required under conditions/ schedules of the existing licence the licensee must provide details of those assessments/ reports that have been completed and agreed with the OEE or as otherwise agreed.

**Attachment N<sup>o</sup> B.10** shall include the schedule of variations and/or adjustments together with the updated drawing.

The following list details the changes to existing Licence conditions that have been agreed with the OEE in 2010 based on compliance history over the previous 5 years, and more recently agreed changes in 2013-2014

Condition/ Schedule No.	Existing Condition	OEE Agreement Reference	Description
Condition 5 Schedule 1(ii)	Rubber fume Biannual Monitoring	Annual	Reduction in Monitoring of Rubber Fume 2010
Condition 6 Schedule 2(ii)	SE1 - COD weekly monitoring	Monthly	Reduction in Monitoring frequency 2010
Condition 6 Schedule 2(ii)	SE1 - Suspended Solids Weekly Monitoring	Monthly	Reduction in Monitoring frequency 2010

Condition 6 Schedule 2(ii)	SE1 -Oils, Fats & Grease Monthly Monitoring	Biannually	Reduction in Monitoring frequency 2010
Condition 6 Schedule 2(ii)	SE1 - BOD Quarterly Monitoring	Biannually	Reduction in Monitoring frequency 2010
Condition 6 Schedule 2(ii)	SE1 – VOC Monitoring Biannually	Annually	Reduction in Monitoring frequency 2010
Condition s 1,2 & 5.4	A2-1 Rubber Fume Stack	Removal 60m within roof space	Change in location of emission Pt. 2014
Condition 1.2	Rubber Fume Emission to Atmosphere	Generic Approval - Trial use Gleitmo Coating	Temporary Approval VOC emission pending Licence Review Application 2013

Supporting information should be included in **Attachment N° B.10**.

**Attachment B.10 includes:**

- A copy of the OEE correspondence regarding reason for review of licence
- (EPA)ELP follow up correspondence re licence review
- Application Form Drawing 12 Proposed Gleitmo Coating Process Layout and Elevations
- Application Form Drawing 6 Emission Point A2-1 BU3 Original Location
- Application Form Drawing 7 Emission A2-1 BU3 New Location
- Schedule of Variations and/or Adjustments OEE
- ALDER Approval notice of relocated A2-1 Emission point
- ALDER Response to Temporary Waiver Gleitmo

## SECTION C: MANAGEMENT OF THE INSTALLATION

### C.1 Site Management & Control

Details should be provided on the management structures for the activity. Organisational charts and all relevant environmental management policy statements, including provisions for on-going assessment of environmental performance, are required.

G.BRUSS management structures are developed to manage activities relating to personnel, environment, quality, production and maintenance on site. An overview process map showing the interaction of processes in the facility and the company's organisational chart are included in **Attachment C.1**.

Progression of goals and objectives are reported on and reviewed at Management Review (SOP ) biannually. KPI (Key Process Indicators) are managed on a daily and weekly basis by cross-functional teams. **Attachment C.1** includes SOP Management Review

#### Quality Management System

G.BRUSS operates a documented Quality Management System according to the automotive Technical Specification ISO TS 16949:2009, a version of ISO 9001. The company is certified to the standard by the German Accreditation body TUEV NORD. The QMS facilitates the company's commitment to Quality.

Overall responsibility for the implementation of the quality system lies with the Quality Manager. **Attachment C.1** includes a copy of current certificate ISO TS 16949.

#### G.BRUSS Environmental Policy

It is the policy of G, BRUSS to operate in a manner designed to prevent pollution and to protect the environment.

G.BRUSS is committed to continuous environmental improvement and objective are put in place to conserve and reduce where possible energy consumption, material usage.

G.BRUSS encourages environmental responsibility through all levels of the organisation, by awareness programs and training.

A copy of the G. BRUSS Corporate Quality, Environment, Health& Safety Policy is included in **Attachment C.1**.

#### EPA IPC Licence

In accordance with the company's current IPC licence G. BRUSS monitors emissions to atmosphere, sewer and noise. Monitoring results and details of all waste generated by the company are reported to the Agency in the Quarterly and Annual Environmental Reports. **Attachment C.1**. includes copy of AER 2014, 2013.

#### Calibration and Maintenance

The maintenance team manage the calibration and Maintenance maintenance and calibration of process equipment and machinery on site including abatement systems of emission to Atmosphere. This is the only abatement system relevant to the activities of G. BRUSS. Maintenance of equipment at G. BRUSS is operated through an external Asset Management System provided by LOTUS AMC. This is a preventative and predictive maintenance management system that ensures that the site is operating at maximum efficiently and contributes towards ensuring that the site operates in accordance with the

IPC Licence Conditions. Procedures are in place for the maintenance of the abatement system on site. **Attachment C.1** (ENGI 059) ESP Unit Maintenance

**Waste Storage and Disposal Systems**

The responsibility for Waste Storage and Disposal Systems rests with the Environmental Manager. Each employee has a responsibility to following the designated waste streams and procedures in place for the correct handling and disposal of waste on site. Procedures These include the storage and disposal of Hazardous and Non-Hazardous Waste (EHS 43, 32, 34, 38 ).

G. BRUSS aims to reduce the quantity of waste produced by its processes, and where waste is generated, to determine the most environmentally beneficial methods for controlling, recycling, or disposing of waste.

Procedures are in place for the storage, segregation and separation of waste streams on-site and records of all waste is maintained by the Env. Department.

Details on the handling of waste at G. BRUSS are found in **Section H.2.**

**C.2 Environmental Management System (EMS)**

Indicate whether an Environmental Management System has been developed for the installation. If yes, specify which standard, if any, and include a copy of the accreditation certificate as appropriate.

G. BRUSS maintains a documented Environmental management System in accordance with the requirements of ISO 14001:2004. The facility is certified to the standard by the German accreditation body TUEV NORD. **Attachment C.2** includes a copy of current Certification.

**C.3 Hours of Operation**

Provide details of the hours of operation for the installation, including:

- (a) Proposed hours of operation.
- (b) Proposed hours of construction and development works and timeframes.
- (c) Any other relevant hours of operation expected including those specified in a grant of permission under planning.

(a) The normal hours of operation at G. Bruss GmbH are as follows:

Facility Area	Normal Hours of Operation
BU1, BU2, BU3	Permanent Night Shift 12am-8am Monday - Friday
	Rotating Day shift 8am – 4pm Monday - Friday
	Rotating Evening Shift 4pm – 12pm Monday - Friday
Administration	Day shift 8am – 4pm Monday - Friday
Proposed	
Gleitmo Coating	Day Shift only predicted max 6 Hours per week

The facility operates for a total of 50.4 working weeks, 252 working days in a calendar year.

- (b) Housing unit for proposed Gleitmo Coating is in place.
- (c) Proposed 'Gleitmo' coating - none

The facility may run production operations in BU2, BU3 occasionally where necessary on an over-time basis, Saturday Day shift 8am – 4pm. However this is maintained strictly at a minimum throughout the year.

This information should form **Attachment N<sup>o</sup> C**.

**SECTION D: INFRASTRUCTURE & OPERATION**

**D.1. Operational Information Requirements**

Describe the plant, methods, processes, ancillary processes, abatement, recovery and treatment systems, and operating procedures for the activity, to include a copy of such plans, drawings or maps, (site plans and location maps, process flow diagrams), and such other particulars, reports and supporting documentation as are necessary to describe all aspects of the activity. Maps and drawings must be no larger than A3 size.

**Unit operations on Site**

Operations at G.BRUSS are segregated into business units, BU1, BU2, BU3. The units are generally distinguished by the type of moulding machine operating in each area. A range of synthetic rubber types are used in all areas of production. All synthetic rubber in use at the G.BRUSS GmbH Sligo facility is manufactured in the G. BRUSS parent company in Hamburg Germany. Material is shipped weekly to the G.BRUSS Sligo Site.

There are a number of finishing processes and support functions to manufacturing. The total Processes can be listed as follows, however not all process are applicable to all product or production areas :

Process	Description
Milling	BU1 - Pre-manufactured raw material requires milling to soften and extrusion to form rubber pre-forms in preparation for moulding. This represents approximately 20% of total production.
Extrusion	BU1 only - Milled rubber is loaded in 'pig' form to an extruder for cutting into specified dimensions for compression moulding. Manual operation, parts removed from mould via compressed air.
Horizontal Injection Moulding	BU2 - Automatic and semi-automatic injection moulding of rubber parts in continuous cycle.
Vertical Injection Moulding	BU3 - Large injection mould machine types for the manufacture of large gaskets. Injection moulding of rubber fed to machine in strip form and moulded at temperatures ranging from 175oC to 200oC. Manual operation, parts are removed from the mould via operator compress air.
Compression Moulding	Compression of rubber preforms at temperatures ranging from 175oC to 200'C. Manual operation, parts are removed from the mould via operator compress air.

Cryogenic Deflash / Shotblast	Parts are rough- deflashed and/or refined -deflashed in liquid Nitrogen using plastic shot media to give a flash free finish
Post-cure Tempering	Tempering of rubber parts for varying number of hours at temperatures ranging from 150oC to 220oC to complete vulcanisation process and bring to final properties.
Coating Various	Various water-based emulsions applied as wet lubricant on rubber parts to aid assembly at end customer
Washing	Washing of certain products in clear water to remove ambient dust. Customer driven sediment specification requirements
Inspection	Auto-vision inspection equipment and visual inspection for attribute defects on rubber parts
Laboratory Testing	Mechanical testing of Shore A / Micro Hardness, Density, Rheometry, Tensile & Elongation of Rubber Product
Range of rubber types	ACM, FKM, AEM, NBR, HNBR, EPDM

Table 2 Summary List of process at G.BRUSS

### **Business Unit Capacity**

Business Unit	Machine capacity	Throughput (million) 2013
BU1 Compression	<u>12</u>	190
BU2 Horizontal Injection	<u>30</u>	924
BU3 Vertical Injection	<u>11</u>	8.2

Table 3 BU Capacities

### **Emissions to Environment**

#### **Emissions to Atmosphere**

G. BRUSS is currently licenced for 4 off rubber fume stacks emitting rubber fume and particulate matter to atmosphere. Emission points are: A2-1 to A2-4. Since grant of its licence in 2000, G. BRUSS has operated rubber fume stacks with no breach of licence conditions. The rubber fume is generated by the oven tempering post-cure process and is abated by electrostatic precipitation in line with BAT for this type of emission. Abatement of rubber fume is discussed in **Section F**

This licence review application proposes an additional emission point to atmosphere of VOC, proposed A2-5. This emission is not currently within the scope of the G. BRUSS IPC Licence. The current status of emissions to atmosphere are discussed in **Section E**

#### **Emissions to Sewer**

Process consumption of water at G. BRUSS is mainly derived from the washing of parts process and further consumption by sanitary and canteen facilities. Washing process is carried out without the use of detergent or any other additional aid. Process effluent and sanitary / canteen waste water to the local

authority sewer, subject to monitoring of parameters COD, BOD, SS, OFG, pH according to condition set out in IPC licence. Waste water and process effluent are described in **Section E**

**Noise** – noise is emitted from process activities as shown on **Application Form Map 3**, air compressor units, overhead ventilation fans, enclosed cooling tower, Mills, intake fans, and emergency standby generator. Noise monitoring is carried out annually and is in full compliance with Licence conditions  
Details of noise emissions to the environment are included in **section E**

**Waste** – waste rubber generated by moulding processes, waste from consumables associated with support processes such as maintenance, canteen, laboratory mechanical testing are managed through designated waste streams. Waste generation and management at G. BRUSS is detailed in **Section H**.

**Attachment D** includes a G. BRUSS production synopsis, a plan of site activities,

**New Proposals – Gleitmo Coating Process**

The proposed new coating process 'Gleitmo Coating' is a low volume speciality coating process . The coating material is solvent based, supplied by FUCHS Lubritech, Germany. Its function is specifically designed to produce a low friction dry surface to rubber product to aid assembly at the final customer.

The process has been in concept stage since 2011. Serial stage has now been confirmed and start-up process equipment is in place. Two serial part numbers of G. BRUSS to OEM customer Daimler AG have been designated for this coating application. The predicted annual capacity is in low volume and is detailed below :

<b>Daimler Production Gleitmo Coated (predicted 2015)</b>	<b>Total Parts Sold G. BRUSS Yearr 2013</b>	<b>Gleitmo Coated Parts % Sales</b>
<b>1.715 million</b>	<b>119.79 million</b>	<b>1.43</b>

Table 5 Daimler 'Gleitmo Coated' parts predicted production volumes

**Gleitmo Coating Process Description**

The coating designation is Gleitmo 9680 SFL and is made up of 3 components K1, K2 & K3. These liquids are mixed just before adding to the rubber product in a ratio of 30:3:1 respectively by volume.

These 3 constituent liquids are pumped individually from storage containers at the point of coating.

Maximum storage quantities at this location are K1=5 litres, K2=1 litre & K3=1 litres. Drip tray and overspill bund are in place to catch any spillage.

Rubber product is weighed to establish a batch quantity, typically 5 kgs, and the 3 fluids are then dispensed into 1 container. The typical volume of the 3 combined fluids for the 5 kg rubber batch is 34 millilitres.

The rubber product and mixed compound are combined in a hexagonal rotating stainless steel washing drum which disperses the coating evenly over the rubber product.

Fume generated from the washing activity is extracted from the enclosed drum by a ventilation cowl and centrifugal fan. This fume is passed through a large activated carbon filter unit before exhausting to atmosphere. The coated rubber product is next placed in plastic boxes and placed in a drying booth for 1 hour rest time to finally cure the coating.

**Attachment D** includes Application Form Drawings 11, 12 which detail the Gleitmo process equipment, process flow and elevations of exhaust vent to atmosphere, proposed A2-5 emission point.

### Process Equipment

All equipment is EX rated and earth bonded to guard against an explosion potential.

The washing drum, where the coating activity takes place, is enclosed during operation. Fluid, 34ml, is added to the drum by spray gun to open drum. The drum is then closed before rotation and fume is drawn off by centrifugal extraction. The coating room is closed during all operations and operators are supplied with an independent air supply. This is to counteract local odour nuisance for the operator while working in the coating room.

Abatement of fume arising from the enclosed washing drum is an activated carbon unit using an F5 grade filter. The abatement system is discussed in **Section F**.

**Attachment D** includes Application Form Drawings 11, 12 which detail the Gleitmo process equipment and abatement system.

### Gleitmo Process Emissions

Analysis has been carried out on samples taken from a trial run of the process. Samples from Pre-abatement and post abatement of fume were included in the analysis. A screening Air Dispersion Model is available to examine effects on local receptors. Emissions to atmosphere from the process are discussed in **Section E**.

### Gleitmo Process Waste

The solid hazardous waste, gloves, drum wipe down rags along with empty containers generated from this process shall be disposed of in U.N approved sealed containers by a licenced contractor. It is then transferred to Recyfuel S.A. in Belgium for incineration. Details of waste handling and disposal are found in **Section H**

A development and operational history of the site should be included here.

G.BRUSS GmbH commenced operations in Sligo 1982 at the former ANCO premises located at Finisklin Road Silgo. G.BRUSS employs circa 300 people on a 3 shift 5 day working pattern. The Sligo facility is part of the DICHTUNGSTECHNIK G. BRUSS GmbH Group which has operations in 5 countries serving the major car manufacturers, e.g. GM, Daimler, VW Group, FORD, BMW and their subsidiaries.

The company was granted IPC licence PO465-01 in 2000.

**Attachment N<sup>2</sup> D** should contain a list of all unit operations (processes) to be carried out, including flow diagrams of each with any relevant additional information.



## SECTION E: EMISSIONS

The applicant should address in particular any emissions which may contain the principal polluting substances listed in the First Schedule of Environmental Protection Agency (Integrated Pollution Control) (Licensing) Regulations 2013.

### E.1. Emissions to Atmosphere

#### E.1.A. Details of all point emissions to atmosphere

Details of all point emissions to atmosphere should be supplied. Complete Table E.1(i) for Boiler Emissions and Table E.1(ii) and E.1(iii) for all other main emission points. Complete Table E.1(iv) for minor emission points.

A summary list of the emission points, together with maps and/or drawings (no larger than A3), and supporting documentation should be included as **Attachment N<sup>o</sup> E**. Plans of emission elevations, relevant roof heights, etc., should also be included, as should detailed descriptions and schematics of all abatement systems.

For emissions outside the BAT guidance limit, a full evaluation of the existing abatement/treatment system must be provided. A planned programme of improvement towards meeting upgraded standards is required. This should highlight specific goals and a time scale, together with options for modification, upgrading or replacement as required to bring the emissions within the limits as set out in the BAT (s). These notes can be found on the EPA website at [www.epa.ie](http://www.epa.ie).

Taking into account the principal polluting substances listed in the First Schedule of Environmental Protection Agency (Integrated Pollution Control) (Licensing) Regulations 2013 and the conditions of its existing licence, G. Bruss has identified the following emissions to atmosphere from its site:

#### Existing Emissions to Atmosphere

##### **Main Emissions**

The emission of rubber fume / particulate matter PM10 constitutes the main atmospheric emission from the G.Bruss site.

Rubber fume arises from the post cure oven tempering of rubber product to complete the vulcanization process and give the product its final properties.

On receipt of final determination of its licence in 2000 and before 2001, G. Bruss had reduced its point emissions to atmosphere from 18 to 4 stacks. This was achieved by the grouping of ovens and the installation of an abatement system per oven group. Since 2001, G.BRUSS has operated with four off rubber fume stacks, regulated under Condition 5, Schedule 1(i),(ii) of its existing licence.

The abatement systems in place at tempering oven stacks are electrostatic precipitators.

Since 2001, G.BRUSS has not breached licence conditions of emissions to atmosphere of rubber fume. Previous to obtaining IPC licence PO4654-01 and the installation of ESP abatement of rubber fume, raw fume and odour nuisance were being emitted. Since abatement has been installed, no complaints have been received on odour nuisance by G. BRUSS or the local authority.

Table 2 is a summary of the output per hour/year from the main emission points, associated process equipment and abatement systems, total calculated emission levels for years 2013 and 2014

Main Emission Point to Atmosphere	Process Equipment Tempering Ovens	Abatement System ESP <sup>2</sup>	Emission Limit Value 150mg/m <sup>3</sup> if emission is < 0.5 Kg/h		
			Result Kg/h	Particulate <sup>3</sup> PM10 kg/Yr 2014	Particulate <sup>3</sup> PM10 kg/Yr 2013
A2-1	No. 5,6,7	ESP 08	0.012	72.57	54.43
A2-2	No. 8,9,10	ESP 04	0.008	48.38	211.68
A2-3	No. 11, 12, 13	ESP 02	0.046	278.21	48.38
A2-4	No. 3,4 – 1,2 <sup>1</sup>	ESP 04	0.007	42.34	6.05

**Table 2 Summary of Emissions to Atmosphere – output per annum<sup>4</sup>**

Note 1 Ovens 1,2 intermittent use only, hence difference in Year 2013, Year 2014

Note 2 ESP = Electrostatic Precipitator

Note 3 If total particulates concentration is less than the ELV, the rubber fume concentration is therefore below the limit. It was deemed not necessary to calculate rubber fume as total particulates did not breach the ELV or mass flow threshold.

Note 4 Output is calculated based on process running 24h per day, 252 working days per annum

**Attachment No. E.1.A** includes detailed Rubber Fume Stack Monitoring Report 2014. Monitoring and analysis was carried out in consideration of EPA Policy on Monitoring of Stack Emissions to Air, Jan 2014. Table E.1(ii) is completed for main emission points. Includes **Application Form Drawings 8, 9** elevations of air emission points BU1,2,3.

### Minor Emissions

Historically, on first application for IPC licence, G. BRUSS identified minor air emission points as described in table 3:

Minor EM Pt.	Description / Location
A3-2 to A3-14	Roof-mounted Ventilation Fans BU1, BU2
A3-1, 15 -17	Emergency Generator, Diesel Boilers in Dispatch, Maintenance

**Table 3 Minor Emission Points**

#### (1) Roof-mounted ventilation

BU1 and BU2 production areas are fitted with ventilation system to ensure air circulation in the manufacturing area. The internal ambient air rising to roof level and emitting through the ventilation system is not considered to be a significant emission to atmosphere, having been submitted as part of the original IPC Licence application. Subsequent monitoring was not deemed necessary. Minor emission points as detailed in table 3 are not now included in current licence conditions. Table E.1(iv) has not therefore been completed for minor ventilation emissions.

#### New Process and Environmental Improvement 2014

The relocated BU3 production hall, in Q2 2014, was fitted with 6 overhead ESP Filtration Units to purify ambient air by removing rising rubber fume / particulate at a level above the

production activities. The overhead ventilation in this area is in place now solely as a release during warm weather and not as an essential part of air circulation. This improvement will be carried over to BU1 and BU2 over the coming 12 month period.

**Emergency Generator and Diesel Boilers –**

Emergency generator is a standby unit only in use at times of power outage. Boiler Units located in the Dispatch and Maintenance areas are used for heating the floor areas. All 3 boilers capacities fall below the 250KW threshold and are therefore not a significant emission.

The minor boiler emissions were submitted as part of the original IPC Licence application, subsequent monitoring was not deemed necessary. Minor emission points as detailed in table 3 are not now included in current licence conditions. Table E.1(iv) has not therefore been completed for minor boiler emissions.

**New Process and Environmental Improvement 2014**

Boilers in operation will be replaced by a heat recovery system associated with a new air compressor unit. Capital investment in new technology replaces older compressor units currently in place. This activity is planned for completion in Q4 2014. Details of this initiative form part of **section G**

**New Proposals - Emission to atmosphere**

This Licence review application concerns the introduction of a new coating process, 'Gleitmo Coating'. The coating is a solvent based dry film lubricant which is applied as a surface finish and assembly aid for small pure rubber components. The coating is prescribed by the automotive OEM Daimler AG. The project has been in design stage for a number of years. It is now envisaged that two of the current serial part numbers of G.BRUSS to Daimler AG are to be modified with this surface coating application.

This is a low volume speciality coating process, but one which represents significant business for G. BRUSS with an long standing Key OEM customer.

Table 3 summarises the predicted volumes involved in the Gleitmo coating process as a percentage of total sales at G. BRUSS:

Totals: Daimler Parts Gleitmo / Yr predicted 2015	Total: Parts Sold /Yr 2013	% Sales
1.715 million	119.79 million	1.43

Table 4 Gleitmo: % Sales

**Description of Coating Process**

The coating material is solvent based and supplied by FUCHS Lubritech Germany. Its function is specifically designed to produce a low friction dry surface to rubber product to aid assembly at the final customer.

The coating designation is Gleitmo 9680 SFL and is made up of 3 components K1, K2 & K3. These liquids are auto-dispensed and auto-mixed in a ratio of 30(K1) : 3(k2) :1(K3) respectively by volume. The coating is transferred to a spay dispenser at the bunded dispenser unit before adding to the rubber product. The process steps flow as follows:

Note. Extractor unit is switched on and operational at the start of process before coating takes place.

Location: Auto-dispense / weighing station

- (1) Parts are placed on scale and weighed a to pre-determined weight – 5kg
- (2) When activated by operator, fluid auto-dispenses in specified ratio a quantity of fluid – 34ml
- (3) Fluid auto-mixed at bunded dispenser unit
- (4) Mixed fluid transferred to spray dispenser at bunded auto-dispenser unit
- (5) Parts placed in enclosed washing drum
- (6) Parts sprayed with mixed fluid , wash cycle commences – 3min

After wash cycle is completed parts placed in plastic boxes and transferred to drying booth to dry in air before transferring back to production area for packing and dispatch

**Estimated consumption per annum - Gleitmo Coating Product**

Component	Qtys held on site / ltr	Consumption tonnes / Yr
K1	5	0.0624
K2	1	0.00996
K3	1	0.00525
Total:		0.0776

Table 5 Estimated consumption Gleitmo Coating per annum

In July 2014 G. BRUSS undertook monitoring of the emission to atmosphere from the coating process as operational. Emissions are as follows:

Emission Source	Substance	Emission Conc. mg/m <sup>3</sup>	Emission Flow g/h	ELV S.I 565 2012 Schedule4 <sup>1</sup> mg/m <sup>3</sup>	Mass Emission estimated (kg / annum)
A2-5 Pre-Carbon Filter	Propan-2-ol	121.0	47	20	
	VOC screen	493.3	191	20	
	Dibutyltin	0.3	0.12	20	

A2-5 Post-Carbon Filter	Propan-2-ol	76.3	30	20	8.98
	VOC screen	281.7	109	20	33.05
	Dibutyltin	<0.3	0.12	20	0.035

Table 6 – Monitoring of VOC Emission Proposed A2-5

Note 1 20mg/m<sup>3</sup> at 100g/h

Note 2 20mg/m<sup>3</sup> at 0.10kg/h

Volume flow = 388mg/m<sup>3</sup>

#### Elevation Limits VOC – BAT / TA Luft

BAT Risk Phrase	Mass Flow Threshold sum of compounds	ELV sum of compounds
R 60, 61	≥ 10g/h	2mg/m <sup>3</sup>
Other coating including plastics (from 2013) ≤ 15 (t/year)	VOC ELV mgC/m <sup>3</sup>	75

Table 7 BAT ELV

TA Luft Class III Organics	ELV mg/m <sup>3</sup>	Mass Flow Threshold (g/hr)
Total Organic Carbon (asC)	50	500

Table 8 TA Luft Organics ELV

#### Planned programme of improvement towards meeting upgraded standards

#### BAT Guidance Organotin

G. BRUSS is actively in co-operation with coating supplier FUCHS Lubritec to substitute the use of K3 component Dibutyltin in adherence with S.I. 565/2012 Regulation and IED Directive. The supplier has provided a trial compound, Hexanoic acid, 2-ethyl-, zinc salt, basic. The material safety data information is attached in Attachment E.1 risk phrases 60, 61, 68 are not present in this compound. The feasibility of use is under investigation.

**Attachment E.1.A** includes a detailed report on testing and analysis of A2-5 emissions, testing carried out in line with EPA Policy Air emissions Jan 2014., SDS substitute compound, Hexanoic acid, 2-ethyl-, zinc salt, basic.

It is the intention of G. BRUSS to provide the Agency with information on a course of action to improve the levels of emission currently evident from this process in the short term. It is of note that the mass flow output from this process at current set-up and capacity levels and the intermittent use that this process will involve may be considered as not significant in terms of environmental impact.

G. BRUSS carried out an air dispersion screening model to investigate the effects on the environment and human health of the Gleitmo process emissions and of its currently licenced rubber fume point source emissions, given that the location of A2-1 had changed. Discussion relating to the screening model is included in **section I**.

### **Abatement of Gleitmo Process**

At the current levels of concentration of VOC in final discharge, it is evident that the abatement system in place is approximately 40% effective. Details on a plan of action on the abatement system are found in Section F

#### **E.1.B. Fugitive and Potential emissions**

Give summary details of fugitive and potential emissions in Table E.1(v).

In relation to activities listed in chapter V (for installations using Organic Solvents) of the Industrial Emissions Directive (2010/75/EU);

- specify the relevant category of activity in Annex VII
- specify how the requirements in relation to fugitive emissions will be met.

Full details and any supporting information should form **Attachment E.1.B**

Process activities at G. BRUSS do not produce any other emission to atmosphere other than those described in section E.1 A. This section is not applicable. **Attachment E.1.b No Attachment**

### **E.2 Emissions to Surface Waters**

Tables E.2(i) and E.2(ii) should be completed.

A summary list of the emission points, together with maps/drawings (no larger than A3) and supporting documentation should be included as **Attachment N<sup>o</sup> E.2**.

Details of all List I and List II substances listed in the Annex to EU Directive 2006/11/EC (as amended), contained in any emission must be presented. All surface water runoff and storm water drains discharging to surface water bodies must be included. A National Grid References (12 digit, 6E, 6N) must be given for all discharge points. The identity and type of receiving water (river, ditch, estuary, lake, etc.) must be stated.

Details of all substances listed in the European Communities Environmental Objectives (Surface Waters) Regulations 2009, contained in any emission must be presented. All surface water runoff and storm water drains discharging to surface water bodies must be included. A National Grid Reference (12 digit, 6E, 6N) must be given for all discharge points the identity and type of receiving water (river, ditch, estuary, lake, etc.) must be stated

For emissions outside the BAT guidance limit, a full evaluation of the existing abatement/treatment system must be provided. A planned programme of improvement towards meeting upgraded standards is required. This should highlight specific goals and a time scale, together with options for modification, upgrading or replacement as required to bring the emissions within the limits as set out in the BAT guidance note(s).

Activities at G.BRUSS do not discharge directly to surface waters. **Attachment E.2 No Attachment**

### **E.3 Emissions to Sewer**

Tables E.3(i) and E.3(ii) should be completed. Trade effluent discharges now includes fats, oils, grease or food particles discharged from premises in the course of, or in preparation for, providing a related service or carrying on a related trade.

G. BRUSS has one emission point to local authority sewer. All process waters flow through this point. A flow proportional composite sample is installed and monitoring takes place according to IPC licence Condition 6, Schedule 2 (i) (ii) as amended in 2010 by OEE Castlebar based on good environmental performance. Details of changes are included in **Section B.10**

Processes at G. BRUSS do not consume large amounts of water. Process water is generated from occasional washing of parts to remove ambient dust. OEM customer requirements on sediment levels are the drivers of this activity. Parts are rinsed in clear water only. No detergent or cleaning agent is used.

G.BRUSS performed a drain integrity test on all process drains on site. Two areas of pipework were identified for repair in 2013 and repairs were carried out. **Attachment E.3** includes a copy of the drain integrity testing report and **Application form Drawing 4 Site Services Plan.**

A summary list of the emission points, together with maps and/or drawings (no larger than A3) and supporting documentation should be included as **Attachment N<sup>o</sup> E.3.** Details of all List I and List II substances listed in the Annex to EU Directive 2006/11/EC (as amended), contained in any emission must be presented. All relevant information on the receiving sewer, including any effluent treatment/abatement systems, not already described, with schematics as appropriate should also be included in **Attachment N<sup>o</sup> E.3.** **Includes List I , List II emission in process water to sewer annual analysis**

For emissions outside BAT guidance limit (where given), a full evaluation of the existing abatement/treatment system must be provided. A planned programme of improvement towards meeting upgraded standards is required. This should highlight specific goals and a time scale, together with options for modification, upgrading or replacement as required to bring the emissions within any limits set out in the BAT guidance note(s).

### **E.4 Emissions to Ground**

Describe the existing or proposed arrangements necessary to give effect to Council Directive 80/68/EC on the protection of groundwater against pollution by certain dangerous substances.

The applicant should supply details of the nature and quality of the substance (agricultural and non-agricultural waste) to be landspread (slurry, effluent, sludges etc) as well as the proposed application rates, periods of application and mode of application (e.g., pipe discharge, tanker) having regard to, European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2009, S.I. No 101 of 2009.

For emissions outside the BAT guidance limit, a full evaluation of the existing abatement/treatment system must be provided. A planned programme of improvement towards meeting upgraded standards is required. This should highlight specific goals and a time scale, together with options for modification, upgrading or replacement as required to bring the emissions within the limits as set out in the BAT guidance note(s).

There are no known emissions to ground for the G.BRUSS site. **Attachment E.4 No Attachment**

### **E.5 Noise Emissions**

Give particulars of the source, location, nature, level, and the period or periods during which the noise emissions are made or are to be made.

Sources of noise in the G.BRUSS facility are (1) overhead ventilation in BU1 and BU2 , (2) Air compressor units, (3) air intake fans in BU3, (4) internally , 2 raw material mills situated in BU1 area and (5) enclosed cooling towers units to the rear of the site. **Application form Map 3** Emission Pts Noise outlines the source of noise locations on site. **Application form Map 4** indicates the location of noise monitoring points.

G. BRUSS monitors noise emissions at 4 points. There are 2 site boundary points and 2 noise sensitive location, a nearby school and a residence in a nearby housing area.

Noise from the facility is considered to be a constant background 'hum', emanating principally from roof-mounted fans Noise emissions occur on a 24h basis. No tonal and /or subjective impulsive noise was noted at any NSL at night-time.

Condition 8,3 of Licence No. PO465-01 stipulates that the following noise emissions should not be exceeded at the noise sensitive locations:

Daytime: 55dB Leq  
Night time: 45dB leq

G.BRUSS fully complies with noise emission limits. **Attachment E.5** includes detailed Noise Survey report carried out in June 2014, in accordance with EPA guidance AG4., **Application form Map 3** Emission Pts Noise, **Application form Map 4** indicates the location of noise monitoring points.

Table E.5 (i) should be completed, as relevant, for each source. **Tables E.5(i) are completed.**

Supporting information should form **Attachment N<sup>o</sup> E.5**



The Agency's *Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)* (2012) should be consulted (available on [www.epa.ie](http://www.epa.ie)) where a noise impact assessment is required. A planned programme of improvement towards meeting upgraded standards is required and should have due regard to the noise control and mitigation measures outlined in section 8, and appendix (IX) of the *Guidance Note*. This programme should highlight specific goals and a time scale, together with options for modification, upgrading or replacement, as required, to bring the emissions within the limits as set out in the *Guidance Note*.

### E.6 Tabular Data on Emission Points

Applicants should submit the following information for each emission point:  
 Tabular data on all emission points is included on

Point Code	Point Type	Easting	Northing	Verified	Emission
Provide label ID's assigned in section E	A=Atmospheric SW=Surface Water SE = Sewer GW=Groundwater N = Noise SL=Soil/Ground WS=Waste	6E-digit GPS Irish National Grid Reference	6N-digit GPS Irish National Grid Reference	Y = GPS used N = GPS not used	e.g. SO <sub>2</sub> , HCl, NH <sub>3</sub>

An individual record (i.e. row) is required for each emission point. Acceptable file formats include Excel, Access or other upon agreement with the Agency. A standard Excel template can be downloaded from the EPA website at [www.epa.ie](http://www.epa.ie). This data should be submitted to the Agency on a separate CD-Rom containing sections B.2, E.6 and F.3.

**Tabular Data on each emission point is included on separate CD-ROM with sections B.2, E.6, F.3 with this application.**

## SECTION F: CONTROL & MONITORING

**Describe the proposed technology and other techniques for preventing or, where this is not possible, reducing emissions from the installation/facility.**

Describe what appropriate measures are to be taken where an Environmental Quality Standard requires stricter conditions than would be determined with reference to BAT.

### **F.1: Treatment, Abatement and Control Systems**

Details of treatment/abatement systems (air and effluent emissions) should be included, together with schematics as appropriate.

For each Emission Point identified complete Table F.1(i) and include detailed descriptions and schematics of all abatement systems. **Table F.1(i) completed**

#### Emissions to Atmosphere Abatement Systems

##### **Electrostatic Precipitators – Rubber Fume**

Smog Hog industrial air cleaner is a self-contained precipitator designed to remove airborne contaminants. It features a pre-filter which removes larger particles unsuitable for precipitation, an ioniser section, collection cell, an after-filter to aid air distribution and trap any collected material which might blow off during start-up. G.BRUSS has operated tempering oven collection of contaminant since 2001. No breach of air quality limits have occurred.

##### **Activated Carbon Filtration Unit KV-2000– VOC**

This unit consist of Filter Housing 535H X 535W X 1182L,  
Pre filter F5 Bag 448 X 472 X 305 & Activated carbon  
Discarb cell Grade 50 extra duty 445 x 445 x 598

It has installed capacity based on a maximum volume of 1250 m<sup>3</sup>/h. Volumes of flow noted during analysis of the process fume were low, 388 m<sup>3</sup>/hr (actual). The unit is located directly after the extraction hood for the washing operation. Stage 1 consists of a pre-filter and stage 2 an activated carbon discarb cell.

At time of testing, this filter was 40 % effective in removing concentrations of VOC in the fume. At present the run time and volume of flow in this process is low. The equipment in place is suitable for a start up operations and in the light of the analysis report received in August 2014 the type and strength of filtration is under review with filtration specialists. This review will be complete in Q4 2014. BAT guidance in relation to low flow/high concentrations with intermittent use of the process will be investigated . Feasibility studies on current levels of process use and capital expenditure are in review during these investigations. **Section I.8** includes details of G. BRUSS consultation with BAT guidance

### Process Water Emission to Sewer

There is currently no abatement system in place on process water discharge to sewer. No detergents or additives are used in production process involving water consumption on site. All maintenance activities involving clean down of equipment is carried out in the degreasing area and oily contaminated water / water contaminated with shot media is collected for disposal as hazardous with licenced contractor

In line with environmental process improvement G. BRUSS proposes to insert a drain guard (Recycled Model) to capture sediment and Hydrocarbons at the SE1 convergent drain junction, prior to discharge to sewer.

**Attachment N<sup>o</sup> F.1** should contain any supporting information.

Attachment F.1 includes Application Form Drawing 10 – Schematic Electro-Static Precipitator Unit Flow **Application form Drawing 11**-gleitmo Process and abatement schematic is included in **Attachment D.1**

### **F.2: Emissions Monitoring and Sampling Points**

Identify monitoring and sampling points and outline proposals for monitoring **emissions**. Table F.2 (i) should be completed (where relevant) for air emissions, for emissions to surface waters, for emissions to sewers, for emissions to ground, and for waste emissions. Where **ambient** environment monitoring is carried out or proposed, Table F.2 (ii) should be completed as relevant for each environmental medium.

Include details of monitoring/sampling locations and methods.

There are no direct discharges to surface water and no discharges to groundwater from the BRUSS site.

### Emissions Monitoring and Sampling Points to Atmosphere

The emission points and monitoring schedules are:

A2-1	ESP 08	Total Particulate Matter	Annual Sampling and analysis per Licence Condition
A2-2	ESP 04	Total Particulate Matter	Annual Sampling and analysis per Licence Condition
A2-3	ESP 02	Total Particulate Matter	Annual Sampling and analysis per Licence Condition
A2-4	ESP 03	Total Particulate Matter	Annual Sampling and analysis per Licence Condition

The above emissions of licenced rubber fume stacks are monitored in accordance with licence conditions

### **Proposed A2-5 VOC Emissions**

A2-5 CF01 Charcoal Adsorption periodic monitoring proposed 6 monthly sampling and analysis while abatement improvement in ongoing and limit vales are achieved

**Emission Points to Sewer and Monitoring schedules:**

SE1 End of Pipe Flow Proportional Composite Sampler Monthly

BOD	BOD <sub>5</sub> 5210B	Biannual
COD	HACH Method 800	Monthly
Suspended Solids	TSS	Monthly
Oils Fats & Grease	Oil & Grease 5520B	Biannually
pH	Electrochemical	n/a
Temp	< 25°C	n/a

These monitoring schedules are in accordance with our current IPC Licence

**Emission and Monitoring Points Noise**

Noise Monitoring Points are:

NSL 1	61 Rathedmond Residence	Acc. To AG4 Bruel and Kjaer Sound Level Meter
Annual		
NSL2	School	Acc. To AG4 Bruel and Kjaer Sound Level Meter
Annual		
NMI 3	Site Boundary	Acc. To AG4 Bruel and Kjaer Sound Level Meter
Annual		
NML4	Site Boundary	Acc. To AG4 Bruel and Kjaer Sound Level Meter
Annual		

Noise monitoring in in accordance with IPC Licence conditions

**Attachment N<sup>o</sup> F.2** should contain any supporting information.

**F.3: Tabular Data on Monitoring and Sampling Points**

Applicants should submit the following information for each monitoring and sampling point:

Point Code	Point Type	Easting	Northing	Verified	Pollutant
Provide label ID's assigned in section F3	M=Monitoring S=Sampling	6E-digit GPS Irish National Grid Reference	6N-digit GPS Irish National Grid Reference	Y = GPS used N = GPS not used	e.g. SO <sub>2</sub> , HCl, NH <sub>3</sub>

An individual record (i.e. row) is required for each monitoring and sampling point. Acceptable file formats include Excel, Access or other upon agreement with the Agency. A standard Excel template can be downloaded from the EPA website at [www.epa.ie](http://www.epa.ie). This data should be submitted to the Agency on a separate CD-Rom containing sections B.2, E.6 and F.3.

### **F.3: Tabular Data on Monitoring and Sampling Points is completed**

Point source monitoring/sampling refers to monitoring from specific emission points (e.g. from a boiler stack or outlet from a wastewater treatment plant). Examples of ambient monitoring includes monitoring of ambient air quality (e.g. boundary or off-site) or monitoring of river quality upstream/downstream of an effluent discharge.

## **SECTION G: RESOURCE USE AND ENERGY EFFICIENCY**

### **G.1 Give a list of the raw and ancillary materials, substances, preparations, fuels and energy which will be produced by or utilised in the activity.**

A comprehensive list of raw and ancillary materials has been provided in **Table G.1(i) and Table G.1 (ii)**. This table includes new items i.e. Gleitmo constituent 3 part substances. Predictions on consumption have been estimated.

The raw and ancillary materials in use at G. BRUSS are stored only in the volumes required for manufacturing. G. BRUSS operates a KanBan system in all areas of the site. Materials are only ordered on a pull system basis.

The list(s) given should be very comprehensive, all materials used, fuels, intermediates, laboratory chemicals and product should be included.

Particular attention should be paid to materials and product consisting of, or containing, dangerous substances as described in the EU (Classification, Packaging, Labelling and Notification of Dangerous Substances) Regulations 2003 [SI 116/2003] and Regulation (EC) No. 1272/2008. The list must classify these materials in accordance with both of these Regulations, and must specify the designated Risk Phrases (R-Phrases) and Hazard Statements. R-Phrases for each substance should be in accordance with Article 21 of the S.I 1272/2008.

Tables G.1 (i) and G.1(ii) must be completed. Copy as required.

**Tables G.1(i)(ii) completed.**

Supporting information should be given in **Attachment N<sup>o</sup> G. includes Environmental Management Programme 2012 - 2015**

### **G.2 Energy Efficiency**

A description of the energy used in or generated by the activity must be provided. Outline the measures taken to ensure that energy is used efficiently and where appropriate, an energy audit with reference to the EPA Guidance document on Energy Audits should be carried out.

Energy management is key to sustainability for G.BRUSS as a manufacturer and employer and key in achieving the company environmental objectives. Energy management is included as part of the environmental management programme and performance is measured.

Initially this took the route of an energy systems audit where a number of machines types and ovens were assessed for electrical usage using an energy meter. From this it became apparent that certain machines were more energy efficient than others and reasons were investigated.

As part of Environmental Management Plan 2012 – 2015 G. BRUSS has implemented the following energy management strategies:

Table 9 Energy and Resource Continuous Improvement Programmes

Activity	(a)(b)(c)(d)(e)	Objective
<b>Tooling: New design concept. Pin Gate Retrofit</b> - resinking of original steel, remachining of mould cavities and runner systems to one point injection Pin Gate design. <b>New tooling – fitted with Pin Gate design</b> Target Tooling – High Runners BU2 Automatic Injection Moulding	Efficiency in Resource use, Reduction in Energy use (d)	<b>Reduction in Materials Consumption –</b> Reduction in raw rubber compound usage , reduction in waste rubber at moulding.  <b>Reduction in Nitrogen usage –</b> elimination of process step- Cryogenic Deflash- on modified tooling
<b>Review of process parameters</b> per material group reducing tempering hours  Note. Tempering Ovens associated with Emissions to Atmosphere A2-1 to A2-4	<b>Reduction in Energy Emissions to Atmosphere</b> per throughput of product (a)(d) BAT application	<b>Reduce energy consumption</b> <b>Reduce emission to Atmosphere per parts processed</b> Ovens- reduction in run-time hours per material group, Product requiring less time in ovens. Use of Tempering ovens remains a 24/7 activity, however product throughput has increased by 5.6%. BAT is used in the abatement system rubber fume oven stacks
Lighting retrofit  <b>Production moulding machines - Retrofits</b>	<b>Energy Saving</b>	870 bulb change to energy efficient fluorescent tubes.  Inverter drives installed to 14 off MIR Machines, 10 off Vertical Injection Machines Intelligent Soft Starter unit for 12 off compression moulding machines – <b>Low cost units to stop motor when machine is in cycle with no demand</b>
<b>Enclosed Cooling Towers</b>	BAT Application	<b>Reduction in noise</b> <b>Reduction in energy usage</b> <b>Elimination of risk air-bourne</b>

		<b>contaminant Legionella</b> Replacement of open cooling tower system with enclosed.
Compressor Unit – <b>Heat recovery system</b>	BAT Application	<b>Reduction in Fuel consumption</b> Elimination of minor air emissions from 3 off boiler units Reduction in fuel oil consumption
<b>Environmental KPI – (Key Process Indicators)</b> Integration of environmental and safety KPI's into daily and weekly production targets and activities, operated and maintained by production personnel.	Systems Review and Training (e)	<b>Pollution and Accident Prevention</b> Focus on accident/pollution prevention: check bunding and labelling of process chemicals, authorized usage, housekeeping and cleanliness, containment equipment availability, storage and ordering, site walkabout and inspection.

Energy Provision on site

The following data summarises the energy consumption on site and savings achieved since 2012:

Nitrogen

Year	Total Nitrogen per 1,000 parts	Saving %
2012	25,25	5.86
2013	23.77	

Electricity

Year	Kwh per 1,000 parts	Saving %
2012	82,41	20.47
2013	65.54	

Fuel Oil – Boilers in Dispatch and Maintenance

Year	Litres	Increase %
2012	6,195	64
2013	10,176	

In Q4 2014, the 3 existing fuel oil boilers will be replaced by a heat exchange system associated with a new clean technology air compressor unit. The heat generated from the operation of the compressor can be fed back into the the spaces presently being heated by the boiler units. Boilers will be maintained as a standby facility only if required.

## SECTION H: MATERIALS HANDLING

### H.1 Raw Materials, Intermediates and Product Handling

All materials should be listed in Tables G.1 (i) and G.(ii) of **Section G**.

Details of the storage conditions, location within the site, segregation system used and transport systems within the site should be outlined here. In addition, information relating to the integrity, impermeability and recent testing of pipes, tanks and bund areas should be outlined.

A comprehensive list with full details of raw and ancillary materials is provided in Table **G.1(i) and G.1(ii)**.

#### Transport of materials

All materials for the site are received at warehouse from where they are receipted and stored in an appropriate manner.

On site G.BRUSS operates a finger swipe security system with no visitor access except on being accompanied by a member of staff.

Materials are segregated according to their individual properties. The layout of the chemical store is designed to segregate non-compatible items. A secured flammable unit is on site to contain all flammables and will house the 'Gleitmo Coating components'

Bund integrity test Reports and summary table of all storage locations on site and segregation applied are attached in **Attachment H.1**.

**Application Form Drawing 13 – Materials Handling & storage included in attachment H.1**

### H.2 Describe the arrangements for the prevention or minimisation of waste and, where waste is produced, the on and off-site arrangements for the recovery or disposal of solid and liquid wastes accepted into or generated by the installation/facility.

For each waste material, give full particulars of:

- (a) Name
- (b) Description & nature of waste
- (c) Source
- (d) Where stored and integrity/impermeability of storage areas
- (e) Amount (m<sup>3</sup>) and tonnage
- (f) Period or Periods of generation
- (g) Analysis (include test methods and Q.C.)
- (h) European Waste Catalogue Code (Commission Decision 2000/532/EC)



(i) Waste Category per EC Reg. 1069/2009/EC where relevant

**Table 10 Details of waste generation and disposal 2013**

European Waste Code	Hazardous		Description of Waste	
06 02 04	Yes	0.682	sodium and potassium hydroxide	Eco-Safe Systems Ltd (SRCL),54-2
07 02 08	Yes	4.872	other still bottoms and reaction residues	Eco-Safe Systems Ltd (SRCL),54-2
07 02 99	No	3.134	wastes not otherwise specified	BARNA Waste,WCP-MO-08-0604-01
07 02 99	No	188.9	wastes not otherwise specified	Rubber Recovery Ltd,NCC/E/VHE001
07 02 99	No	2.187	wastes not otherwise specified	Eco-Safe Systems Ltd (SRCL),54-2
13 02 08	Yes	2.136	other engine, gear and lubricating oils	Enva Ireland Ltd,WO184-1
20 01 39	No	6.9	plastics	BARNA Waste,WCP-MO-08-0604-01
15 01 10	Yes	0.539	packaging containing residues of or contaminated by dangerous substances	Eco-Safe Systems Ltd (SRCL),54-2
15 02 02	Yes	4.91	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances	Eco-Safe Systems Ltd (SRCL),54-2

16 10 01	Yes	0.287	aqueous liquid wastes containing dangerous substances	Eco-Safe Systems Ltd (SRCL),54-2
17 04 05	No	1.2	iron and steel	BARNA Waste,WCP-MO-08-0604-01
20 01 08	No	2.76	biodegradable kitchen and canteen waste	BARNA Waste,WCP-MO-08-0604-01
16 05 04	Yes	0.06	gases in pressure containers (including halons) containing dangerous substances	Eco-Safe Systems Ltd (SRCL),54-2
20 01 36	No	0.72	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	BARNA Waste,WCP-MO-08-0604-01
20 01 01	No	6.7	paper and cardboard	BARNA Waste,WCP-MO-08-0604-01
20 03 01	No	121.8	mixed municipal waste	BARNA Waste,WCP-MO-08-0604-01

Where any waste would be classified as Hazardous Waste as defined in the Waste Management Act, 1996, as amended, this should be made clear in the information provided.

Summary Tables H.1(i) and H.1(ii) should also be completed, as appropriate, for each waste. The licence/permit register number of the waste collection agent or disposal/recovery operator should be supplied as well as the expiry date of the relevant permits.

**Waste streams for waste generated under the conditions of current IPPC Licence No PO465-01 are included in Attachment No. H.2**

Waste recovery and disposal information included in Table H.1(i) and Table H.1(ii) complete

The following table describes the proposed waste storage and disposal for the Gleitmo process

Table 11 Gleitmo Process Hazardous waste stream.

European Waste Code	Hazardous Y/N	Description of waste	Location of disposal/recovery	Final Destination disposal/recovery
15 02 02	Yes	Soiled waste – soiled cloths, disposed personal protective equipment.	SRCL Systems Ltd Kylemore Road Unit 1 Allied Industrial Estate Dublin 10 W0054-02	RECYFUEL S.A. Zoning Industriel d'Ehein, B-4480 Engis Belgium 0459 735 458
15 01 10	Yes	Empty containers	SRCL Systems Ltd Kylemore Road Unit 1 Allied Industrial Estate Dublin 10 W0054-02	RECYFUEL S.A. Zoning Industriel d'Ehein, B-4480 Engis Belgium 0459 735 458

### Solid Waste Gleitmo

Materials used in the process are maintained at the minimum volumes required for manufacturing. The re-order of materials is maintained on a Kanban system and only takes place when current quantities available on-site reach a set low level

Supporting information should form **Attachment N<sup>o</sup> H.2**

### **H.3 Waste disposal by on-site landfilling**

For wastes to be disposed of by landfilling on-site, full details of the disposal site should be submitted (to include *inter alia*, site selection procedures, location maps, (no larger than A3) geology, hydrogeology, operational plan, containment, gas and leachate management, post-closure care).

Supporting information should form **Attachment N<sup>o</sup> H.3\_G**. BRUSS does not participate in on-site landfilling Attachment H.3 Not applicable

## **SECTION I: EXISTING ENVIRONMENT & IMPACT OF THE ACTIVITY**

**Describe the conditions of the site of the installation.**

See sections below

**Provide an assessment of the effects of any emissions on the environment, including on an environmental medium other than that into which the emissions are made. See sections below**

**Describe, where appropriate, measures for minimising pollution over long distances or in the territory of other states.**

Waste leaving the G. BRUSS site is handled in accordance with regulation and conditions of IPC licence. All waste handling contractors are licenced operators.

Provide a statement whether or not emissions of principal polluting substances (as defined in the First Schedule of Environmental Protection Agency (Integrated Pollution Control) (Licensing) Regulations 2013) are likely to impair the environment.

It is considered that no significant impact on the environment from the principal polluting substance, VOC, as defined in the regulations (2013) is predicted from emissions to atmosphere discharged by the G. BRUSS site in relation to the proposed emission point A2-5 VOC Gleitmo coating.

I.1. Assessment of atmospheric emissions

Describe the existing environment in terms of air quality with particular reference to ambient air quality standards.

Give summary details and an assessment of the impacts of any existing or proposed emissions on the environment, including environmental media other than those into which the emissions are to be made.

Sligo town is designated as Zone C (large towns) ambient Air Quality Classification zones. In the annual report 2012, Sligo town was deemed to be (2) GOOD status.

A screening model of ambient air quality was carried out taking into account all emissions to atmosphere from the G. BRUSS site and to determine the effects on local environmental receptors and human health. G.BRUSS included its 4 existing licenced rubber fume stacks in addition to the proposed VOC emission in the study to have an overall picture of emission to atmosphere from the site. The following is a discussion of findings:

**Rubber fume** – the maximum ground level concentration of rubber fume particulate was at 30m within the site boundary. The nearest environmental receptor is the Garavogue transitional area, flowing into Sligo Bay SAC. This is at a distance of 300m from the site. The GLC is 0.0086mg/m<sup>3</sup> and below the limit of 0.05mg/m<sup>3</sup> for PM<sub>10</sub>

**Gleitmo VOC** – At 'worst case approach', Total VOC was shown to be above the Air Quality Standard limit of 0.005 mg/m<sup>3</sup> at the nearest receptor. When separately screened, the two target VOC, Propan-2-ol and remaining VOC (C8 to C10 aliphatic/cyclic hydrocarbons) showed results in breach of Air Quality Standards as follows:

- (1) Propan-2-ol 0.02 mg/m<sup>3</sup> at nearest receptor
- (2) C8 to C10 0.014 mg/m<sup>3</sup> at nearest receptor
- (3) Dibutyltin 0.00005mg/m<sup>3</sup> at nearest receptor - No breach of limit.

**Discussion**

Available data on the environmental fate of Propan-2-ol, this compound is not expected to affect the physical properties of the atmosphere, contribute to global warming, deplete stratospheric ozone or alter precipitation patterns. It has low reactivity in photochemical smog situations and low potential for ground level ozone formation. On investigation of the

air quality standards regarding human health, and when compared to the 1/40<sup>th</sup> of the US OSHA Regulation 29CFR1910.1000 of 24mg/m<sup>3</sup>, propan-2-ol is within the acceptable limit. The aliphatic hydrocarbons circa C<sub>8</sub> to C<sub>10</sub> when compared occupational exposure limits of 2.9 mg/m<sup>3</sup> it is noted that concentrations are within the acceptable limit.

At the predicted rate of 6 hours per week run time for this operation and the low volume rate of flow from the emission point it is considered that no significant environmental impact is expected from the process at this time.

Process effluent, sanitary and canteen waste water from the G. BRUSS site are discharged to the local authority sewer, continuing to the local authority waste water treatment plant before discharge to the Garavogue transitional area, Cumeen Strand/Drumcliff Bay SAC. It is considered that No adverse environmental impact will result from discharges to sewer from the facility.

It is therefore concluded that no significant impact is likely from atmospheric emission from the facility.

**Attachment N<sup>o</sup> I.1** should also contain full details of any dispersion modelling of atmospheric emissions from the activity, where required. When carrying out dispersion modelling, regard should be had to the "Guidelines for the Preparation of Dispersion Modelling Assessments for Compliance with Regulatory Requirements – an Update to Royal Meteorological Society Guidance" or similar guidelines from a recognised authority.

**Attachment I.1** includes the Screening Air Dispersion Model Report carried out at the G. BRUSS site

#### I.2. Assessment of Impact on Receiving Surface Water

Describe the existing environment in terms of water quality with particular reference to environmental quality objectives and standards and any objectives and standards laid down for protected areas. Table I.2(i) should be completed

Indicate whether or not the activity complies with the requirements of the EC Environmental Objectives (Surface Waters) Regulations 2009 S.I. No. 272 of 2009.

If the discharge is to water body that is already achieving high status, or if the discharge is to waters draining to the surface water bodies identified under the First Schedule of the *EC Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009*, compliance must be with the 95<sup>th</sup>ile **high** status limits.

Give summary details and an assessment of the impacts of any existing or proposed emissions on the environment, including environmental media other than those into which the emissions are to be made.

Full details of the assessment and any other relevant information on the receiving environment should be submitted as **Attachment N<sup>o</sup> I.2**. No attachment

Activities at G. BRUSS do not discharge to surface water

For emissions outside emission limit established according to the combined approach, a full evaluation of the existing abatement/treatment system must be provided. A planned programme of improvement towards meeting the upgraded standards is required. This should highlight specific goals and a time scale, together with options for modification,

upgrading or replacement as required to bring the emissions within the limits established in accordance with the combined approach.

### I.3. Assessment of Impact of Discharge to Sewer.

Give summary details and an assessment of the impacts of any existing or proposed emissions on the environment, including environmental media other than those into which the emissions are to be made.

All emissions to sewer from the G. BRUSS site are monitored in accordance with the provisions of the current IPC licence and results are reported to the Agency quarterly and annual environmental reports. All process and sanitary water is combined and discharged to the Local Authority combined sewer which subsequently discharges to the Sligo WWTP.

Full details of the assessment and any other supporting information should form **Attachment N° I.3**. Details of annual discharge to sewer of parameters specified under current licence conditions are included AER report, Attachment C.1

### I.4 Assessment of Impact of Ground/Groundwater Emissions

Describe the existing groundwater quality. Tables I.4 (i) should be completed.

Give summary details and an assessment of the impacts of any existing or proposed emissions on the ground (aquifers, soils, sub-soils and rock environment), including any impact on environmental media other than those into which the emissions are to be made. This includes landspreading, land injection etc.

Land on which material may be landspread shall be identified on a suitable scaled map (1:10,560 and 1:50,000) and submitted as no greater than A3 size. All vulnerable (as a result of ground emissions) surface water bodies must be identified on these maps. Additional information should be included in **Attachment N° I.4**.

Tables I.4(ii) and I.4.(iii) should be complete where applicable. Further information is available in the Application Guidance Document.

There is no emission to groundwater from the activities of G. BRUSS. This section is not applicable to G.BRUSS Activities.

### I.5 Ground and/or Groundwater Contamination

Summary details of known ground and/or groundwater contamination, historical or current, on or under the site must be given.

Indicate whether or not compliance with the requirements of the EC Environmental Objectives (Groundwater) Regulations 2010, S.I. No. 9 of 2010 can be achieved.

Full details including all relevant investigative studies, assessments, or reports, monitoring results, location and design of monitoring installations, plans, drawings, documentation, including containment engineering, remedial works, and any other supporting information should be included in **Attachment N° I.5**.

There are no historical incidences of groundwater contamination from the G. BRUSS site or from its activities.

There is no known risk to groundwater from current licenced activities or the activities proposed in this licence review.

#### I.6 Assessment of the Environmental Impact of On-site Waste Recovery and/or Disposal.

Describe the arrangements for the prevention and recovery of waste generated by the activity.

Give details and an assessment of the impact of any existing or proposed on-site waste recovery/disposal on the environment, including environmental media other than those into which the emissions are to be made. **There is no on-site waste recovery at G. BRUSS**

This information should form **Attachment N° I.6.**

I.7 Noise Impact Give details and an assessment of the impacts of any existing or proposed emissions on the environment, including environmental media other than those into which the emissions are to be made.

Ambient noise measurements

Complete Table I.7 (i) in relation to the information required below: **Table I.7 completed**

- (i) State the maximum Sound Pressure Levels which will be experienced at typical points on the boundary of the operation. (State sampling interval and duration)
- (ii) State the maximum Sound Pressure Levels which will be experienced at typical noise sensitive locations, outside the boundary of the operation.
- (iii) Give details of the background (or residual) noise levels experienced at the site in the absence of noise from this operation.

Prediction models, maps (no larger than A3), diagrams and supporting documents, including details of noise attenuation and noise proposed control measures to be employed, should form **Attachment N° I.7**

**Attachment E.5** includes a copy of the Annual Environmental Noise Survey carried out at the G.BRUSS site. No breach of Licence condition was reported. No historical breach has been noted. No complaints have been received by G. BRUSS in relation to any noise generated at the facility

#### I.8 Environmental Considerations and BAT

**Describe in outline the main alternatives, if any, to the proposals contained in the application.**

Describe any environmental considerations which have been made with respect to the use of cleaner technologies, waste minimisation and raw material substitution.

G. BRUSS is committed to its programme of continuous improvement on site with regard to environmental performance

The use of cleaner technology and reduction in energy and material consumption is presented in **Section G**

Describe the measures proposed or in place to ensure that:

- (a) The best available techniques are or will be used to prevent or eliminate or, where that is not practicable, generally reduce an emission from the activity;  
Reduction in emission of waste

BAT guidance has been consulted in the activities of G. BRUSS. The following table gives a summary of the guidance sought in the set-up of processes on site, **Attachment I.8** includes a detailed description of how BAT has been implemented on site

BREFF 2003 Waste Water/Waste Gas Chemical Sector
BREFF 2009 Energy Efficiency
BATNEEC GUIDANCE NOTE Class 12.1 ORGANO-TIN COATING (V3.2006)
BAT Guidance Note Solvent Use in Coating, Cleaning and Degreasing (1st ed) 2008

Table 11 Summary of BAT Guidance documents consulted at G. BRUSS

- (b) no significant pollution is caused;  
No incidents of significant pollution have occurred to date on site.
- (c) waste production is avoided in accordance with the waste hierarchy in Council Directive 98/2008 EC on waste and section 21A of the Waste Management Act 1996, as amended; where waste is produced, it is prepared for re-use, recycled or recovered or, where that is technically and economically impossible, it is disposed of while avoiding or reducing any impact on the environment (applicants should provide this information in the context of sections 29(2A), 32 and 38(5A) of the Waste Management Act 1996, as amended;  
Waste handling, storage and disposal / recovery at G. BRUSS are detailed in Section H. Minimisation of waste generated is included in **Section G**
- (d) energy and other resources are used efficiently;  
Energy and resource management activities are a key part of environmental planning at G. BRUSS. Details of activities and objectives EMP 2012 - 2015 are included in **Attachment G**
- (e) the necessary measures are taken to prevent accidents and limit their consequences;  
G. BRUSS adheres to the conditions of the current IPPC licence and monitors emissions to atmosphere, sewer and noise in accordance with the provision of the current IPC licence. No incidents of significant pollution have occurred to date on site.
- (f) the necessary measures are taken upon definitive cessation of activities to avoid any pollution risk and return the site of operation to a satisfactory state.  
Plant shut-down and contingency planning are detailed in **Section K**

Supporting information should form **Attachment N<sup>o</sup> I.8**.  
**Attachment I.8** includes a detailed description of how BAT has been implemented on site.



## **SECTION J: ACCIDENT PREVENTION & EMERGENCY RESPONSE**

Describe the existing or proposed measures, including emergency procedures, to minimise the impact on the environment of an accidental emission or spillage.

Also outline what provisions have been made for response to emergency situations outside of normal working hours, i.e. during night-time, weekends and holiday periods.

Describe the arrangements for abnormal operating conditions including start-up, leaks, malfunctions or momentary stoppages.

Supporting information should form **Attachment N<sup>o</sup> J**.

### **Attachment J: includes Emergency Response Plan G. BRUSS EHS 042**

The Plan outlines the roles and responsibilities of G. BRUSS employees in the event of an emergency. This includes contingencies in the event that an emergency situation occurs outside of normal working hours.

Overall responsibility for the Emergency Action Plan lies with the Environment and Health and Safety Managers. An ERP Team has been designated with backup roles in place.

The nearest receptors to the site are Sligo City Centre located approximately 1km from the G. BRUSS Plant.

The nearest residential properties are located approximately 0.2km south west of the facility in the Rathedmond Estate. The Cummeen Strand/Drumcliff Bay (Sligo Bay) Special Area of Conservation lies approximately 0.8km to the north of the site.

The Plan includes a procedure for handling unplanned discharges to Air and Sewer, cleanup of spillages and emergency contacts within the G.BRUSS team and external contractors, public bodies.

## **SECTION K: REMEDIATION, DECOMMISSIONING, RESTORATION & AFTERCARE**

Describe the existing or proposed measures to be taken on and following the permanent cessation of the activity or part of the activity to avoid any risk of environment pollution and to return the site if the activity to a satisfactory state, including provision for post-closure care of any potentially polluting residuals and financial provision where relevant.

Supporting information should be included as **Attachment No. K**.

G.BRUSS GmbH intends to continue successful and profitable operations at its facility at Finisklin Road, Sligo. To address any cessation of operations, an environmental operations risk assessment was carried out in 2008, resulting in a 'low' risk categorisation for operations at the site. This assessment is included in **Attachment K**

Procedures describing the main activities for plant shutdown and contingency planning at G.BRUSS GmbH are included in **Attachment K**.

In general, it is envisaged that specialist equipment will be distributed to sister plants in the event of a shutdown. External contractors that may be required for cleaning, waste disposal, incineration or recycling activities in the event of a decommissioning activity will be approved and licensed. In the event of a spillage, leak or fire during the decommissioning period, the G.BRUSS GmbH Emergency Response Plan will be fully implemented in order to minimise the risk to health and the environment. Emergency Response Plan is included in **Attachment J**

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## SECTION L: STATUTORY REQUIREMENTS

Indicate how the requirements of Section 83(5)(a)(i) to (v), (vii) and (viii) to (x) of the EPA Act 1992, as amended, shall be met, having regard, where appropriate, to any relevant specification issued by the Agency under section 5 (3) of the Act and the reasons for the selection of the arrangements proposed.

Indicate whether or not the activity is carried out, or may be carried out, or is located such that it is liable to have an adverse effect on -

- (a) a site placed on a list in accordance with Part 3 of S.I. 477 of 2011, or
- (b) a site where consultation has been initiated in accordance with Article 5 of the EU Habitats Directive (92/43/EEC).

Undertake a screening for Appropriate Assessment and state whether the activity, individually or in combination with other plans or projects, is likely to have a significant effect on a European Site(s), in view of best scientific knowledge and the conservation objectives of the site(s). Where it cannot be excluded, on the basis of objective scientific information, following screening for Appropriate Assessment, that an activity, either individually or in combination with other plans or projects, will have a significant effect on a European Site, provide a Natura Impact Statement, as defined in Regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations (S.I. No. 477 of 2011). Where based on the screening it is considered that an Appropriate Assessment is not required, provide a reasoned response.

In the vicinity of the G. BRUSS site the following environmental receptors:

- (1) Cumeen Strand/Drumcliff Bay (Sligo Bay) SAC (Site Code: 000627)
- (2) Cumeen Strand SPA ( Site Code: 004035)
- (3) Cumeen Strand/Drumcliff Bay (Sligo Bay) proposed NHA (Site Code: 000627)

A screening air dispersion model was carried out to assess impact of site activities on local environmental receptors.

**Rubber fume** - the maximum ground level concentration or rubber fume particulate was at 30m within the site boundary. The nearest environmental receptor is the Garavogue transitional area, flowing into Sligo Bay SAC. This is at a distance of 300m from the site. The GLC is 0.0086mg/m<sup>3</sup> and below the limit of 0.05mg/m<sup>3</sup> for PM<sub>10</sub>

**Gleitmo VOC** - At 'worst case approach', Total VOC was shown to be above the Air Quality Standard limit of 0.005 mg/m<sup>3</sup> at the nearest receptor. When separately screened, the two target VOC, Propan-2-ol and remaining VOC (C8 to C10 aliphatic/cyclic hydrocarbons ) showed results in breach of Air Quality Standards as follows:

- (4) Propan-2-ol 0.02 mg/m<sup>3</sup> at nearest receptor
- (5) C8 to C10 0.014 mg/m<sup>3</sup> at nearest receptor
- (6) Dibutyltin 0.00005mg/m<sup>3</sup> at nearest receptor - No breach of limit.

### Discussion

Available data on the environmental fate of Propan-2-ol, this compound is not expected to affect the physical properties of the atmosphere, contribute to global warming, deplete stratospheric ozone or alter precipitation patterns. It has low reactivity in photochemical smog situations and low potential for ground level ozone formation. On investigation of the air quality standards regarding human health, and when compared to the 1/40<sup>th</sup> of the US OSHA Regulation 29CFR1910.1000 of 24mg/m<sup>3</sup>, propan-2-ol is within the acceptable limit

The aliphatic hydrocarbons circa C<sub>8</sub> to C<sub>10</sub> when compared occupational exposure limits of 2.9 mg/m<sup>3</sup> it is noted that concentrations are within the acceptable limit.

At the predicted rate of 6 hours per week run time for this operation and the low volume rate of flow from the emission point it is considered that no significant environmental impact is expected from the process at this time.

Process effluent, sanitary and canteen waste water from the G. BRUSS site are discharged to the local authority sewer, continuing to the local authority waste water treatment plant before discharge to the Garavogue transitional area, Cumeen Strand/Drumcliff Bay SAC. It is considered that No adverse environmental impact will result from discharges to sewer from the facility.

It is therefore considered that an appropriate assessment is not required at this time.

Indicate whether or not the activity is liable to have an adverse effect on water quality in light of the European Communities Environmental Objectives (Surface Water) Regulations 2009 (S.I. No. 272 of 2009).

There are no releases to surface water from the G. BRUSS Site

Indicate whether or not the activity is liable to have an adverse effect on water quality in light of the European Communities Environmental Objectives (Ground Water) Regulations 2010 (S.I. No. 9 of 2010).

There are no know releases to ground water from the G. BRUSS site

Indicate whether any of the principal polluting substances specified in the First Schedule of the EPA (Integrated Pollution Control) (Licensing) Regulations 2013, are discharged by the activity to the relevant medium.

The proposed emission point A2-5 will give rise to an emission of volatile organic compound to atmosphere, as discussed above.

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Indicate if the best environmental practices are in place for control of diffuse emissions from the installation/facility as set out in the following legislation:  
There are no diffuse emission associated with the activities or processes of G. BRUSS site.

- (a) a specification prepared by the Agency in accordance with Section 5 of the *Environmental Protection Agency Act 1992* as amended by Section 7 of the *Protection of the Environment Act 2003*;
- (b) the *Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001)* as amended by the *Urban Waste Water Treatment (Amendment) Regulations 2004 (S.I. No. 440 of 2004)* or any future amendment thereof;
- (c) the *European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2009 (S.I. No. 101 of 2009)* or any future amendment thereof; This is not applicable to G. BRUSS activities.
- (d) the *Local Government (Water Pollution) Act, 1977 (Control of Cadmium Discharges) Regulations 1985 (S.I. No. 294 of 1985)*; This is not applicable to G. BRUSS activities.
- (e) the *Local Government (Water Pollution) Act, 1977 (Control of Hexachlorocyclohexane and Mercury Discharges) Regulations 1986 (S.I. No. 55 of 1986)*; This is not applicable to G. BRUSS activities
- (f) the *Local Government (Water Pollution) Acts, 1977 and 1990 (Control of Carbon Tetrachloride, DDT and Pentachlorophenol Discharges) Regulations 1994 (S.I. No. 43 of 1994)*; This is not applicable to G. BRUSS activities

measures or controls identified in a pollution reduction plan for the river basin district prepared in accordance with Part V of the *EC Environmental Objectives (Surface Waters) Regulations 2009 S.I. No. 272 of 2009* for the reduction of pollution by priority substances or the ceasing or phasing out of emissions, discharges and losses of priority hazardous substances.

#### Fit and Proper Person

Section 83(5)(xi) of the EPA Act as amended specifies that the Agency shall not grant a licence unless it is satisfied that the applicant or licensee or transferee as the case may be is a fit and proper person. Section 84(4) of the EPA Act as amended specifies the information required to enable a determination to be made by the Agency.

- Indicate whether the applicant or other relevant person has been convicted under the Environmental Protection Agency Act 1992, as amended, the Waste Management Act 1996, as amended, the Local Government (Water Pollution) Acts 1977 and 1990, the Air Pollution Act 1987 and the Air Pollution Act 1987 (Environmental Specifications for Petrol and Diesel Fuels)(Amendment) Regulations 2004.
- Provide details of the applicant's technical knowledge and/or qualifications, along with that of other relevant employees.
- Provide information to show that the person is likely to be in a position to meet any financial commitments or liabilities that may have been or will be entered into or

incurred in carrying on the activity to which the application relates or in consequence of ceasing to carry out that activity.

**Absence of Convictions**

Neither Mr. Sebastian Vogt nor Ms. Anna Garvey have been convicted under the Environmental Protection Agency Act 1992, as amended, the Waste Management Act 1996, as amended, the Local Government (Water Pollution) Acts 1997 and 1990, the Air Pollution Act 1987 and the Air Pollution Act 1987 (Environmental Specifications for Petrol and Diesel Fuels)(Amendment) Regulations 2004.

Name	Role	EHS Team Function / Qualifications
Mr. Sebastian Vogt	General Manager	Overall Responsibility Resource Mgt.
Ms. Anna Garvey	Environmental Officer	Manager BSc.Env Mgt 2015 IRCA Registered Lead Auditor 2 <sup>nd</sup> & 3 <sup>rd</sup> party ISO14001 & OSHA 18001 SMMT Birmingham Lead Auditor 2 <sup>nd</sup> party ISO TS 16949
Mr. John James	Engineering Manager Safety Officer	Engineering Specialist
Ms. Deirdre McNulty	Project Engineer	Environmental Specialist MSc. Health & Safety, Env. 2014  IRCA Registered Lead Auditor 2 <sup>nd</sup> & 3 <sup>rd</sup> party ISO14001 & OSHA 18001

Supporting information should be included as **Attachment N<sup>o</sup> L** with reference to where the information can be found in the application. **No Attachment**

**SECTION M: DECLARATION**

**Declaration**

I hereby make application for a licence / revised licence, pursuant to the provisions of the Environmental Protection Agency Act, 1992, as amended, and Regulations made thereunder.

I certify that the information given in this application is truthful, accurate and complete.

I give consent to the EPA to copy this application for its own use and to make it available for inspection and copying by the public, both in the form of paper files available for inspection at EPA and local authority offices, and via the EPA's website. This consent relates to this application itself and to any further information, submission, objection, or submission to an objection whether provided by me as Applicant or any person acting on the Applicant's behalf.

Signed by: Anna Gray Date: 6/10/14.  
(on behalf of the organisation)

Print signature name: Anna Gray

Position in organisation: Environmental Manager

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Company stamp or seal:  
**G. Bruss GmbH Dichtungstechnik**  
Finisklin Road, Sligo  
Rep. of Ireland  
Tel. 071-9156300 Fax: 071-9169352  
Vat No. IE4540059I

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