



Environmental Protection Agency  
An Ghníomhaireacht um Chaomhnú Comhshaoil

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Reg No: P0465-02

Dear Ms. Garvey

I refer to your application for a licence review.

I am to advise in accordance with Regulation 10(2)(b)(ii) of the EPA (Integrated Pollution Control) (Licensing) Regulations 2013, that the following information is required in support of the application under Regulation 9 of the Regulations:

#### 1. Emissions From Existing Operations

Please perform the necessary analysis and complete tables E.1(i) and E.1(ii) for existing emissions from each of the four air emission points in use A2-1 to A2-4 at the installation. In this tabular format you should provide the results (in mg/Nm<sup>3</sup> and in g/hr) of a suite of analysis of emissions to air during normal operation of the emission points in order to fully characterise the emission, having regard to relevant substances listed in Table 6.1 of the Agency's 'BAT Guidance Note for the Manufacture of Organic Chemicals' as summarised below:

- Carcinogenic substances listed as Class I, II or III (provide both individual and class total)
- Organic substances listed as Class I (including Annex 1) or II (provide both individual and class total)
- Total Organic Carbon (as C)
- Mercaptans
- Amines (total)
- Trimethylamine
- Phenols, Cresols and xylols
- Toluene di-isocyanate
- Organic Substances with Photochemical Ozone Potential (R59)
- Vaporous or Gaseous Inorganic Substances listed as Class I, II, III or IV (provide both individual and class total)
- Inorganic Dust Particles Class I, II or III (provide both individual and class total)
- Total Particulates

In addition to total particulates you should provide an analysis, based on conservative modelling to indicate whether there is a possibility of breach of relevant air quality

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standards for particulates.

You should provide emission details prior to treatment, a description of the treatment provided and as discharged emissions information. With your listing of each parameter name please include the relevant risk phrase/hazard statement.

**2. Ovens and Vents**

Please clarify the relationship between the ovens and the four existing vents (which ovens discharge via which vents).

**3. Abnormal Operation/Overtime**

On page 21 of your licence application form you note that occasionally, where necessary production operations are run in BU2 and BU3 on an overtime basis as a Saturday day-shift 8am-4pm but that this is strictly maintained at a minimum throughout the year. Please provide details of the frequency and duration of this occurrence in the last three years of operation, the characteristics of the associated emissions, the emissions points used/affected and abatement used.

**4. Proposed Emissions from Gleitmo Coating Process Stack**

(a) Your application (page 28 of your application form) states that in July 2014 G. Bruss undertook monitoring of the emission to atmosphere from the coating process as operational. Please clarify in detail to what extent the process has been operational to date.

(b) Emissions from proposed emission point A2-5 must be characterised accurately. Complete tables E.1(ii) and E.1(iii) for proposed emissions from proposed emission point A2-5 using accurate emission data which reflects proposed emissions. You should provide a justification as to how you determined the emission levels.

**5. BAT Assessment**

(a) Provide an analysis of the applicability of the European Commission reference document on Best Available Techniques in the Production of Polymers to operations at your installation.

(b) Provide a detailed assessment of (a) existing and (b) proposed operations against BAT as specified in Chapter 13 of the European Commission reference document on Best Available Techniques in the Production of Polymers.

(c) Provide a detailed assessment of (a) existing and (b) proposed operations against BAT as specified in the Agency's BAT Guidance Note on Best Available Techniques for the Manufacture of Organic Chemicals.

**6. Applicable Class of Activity**

Provide an explanation/justification as to why you have made your application under Class 5.7 of the First Schedule to the EPA Act 1992, as amended, as opposed to Class 5.12(i).

**7. Planning and Environmental Impact Assessment**

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- (a) whether any application for planning permission for the purposes of the activity to which the licence application relates, is currently under consideration.
- (b) Confirm whether the activity carried out or proposed to be carried out at the installation exceeds/would exceed the capacity threshold (installations for manufacture or treatment of elastomer based products, where the production capacity would exceed 10,000 tonnes per annum) specified for the Rubber Industry in Schedule 5 of the Planning and Development Acts 2001, as amended.

**8. Applicability of Chapter V of the Industrial Emissions Directive**

Specify and describe which, if any, activity or activities listed in Part I of Annex VII of the Industrial Emissions Directive (2010/75/EU) are:

- (a) carried out at the installation
- (b) proposed to be carried out as part of the proposed new Gleitmo process and, in the case of each activity specified and described above describe the level of solvent use associated with the activity and in particular whether the consumption thresholds set out in Part 2 of that Annex are reached.

**9. Substitution of Hazardous Substances**

With reference to the requirements of Article 58 of the Industrial Emissions Directive (2010/75/EU):

- (a) Clarify which substances carrying the listed hazard statements are used in existing processes (please also use the relevant risk phrases when reporting) and
- (b) Provide annual usage for each substance for (a) above.
- (c) In your application submitted in October 2014 you stated that the feasibility of use of an alternative product to dibutyltin was under investigation. Please provide an update with regard to the feasibility of use of the alternative.

**10. Section D.1**

In Section D.1 of your licence application you provided a process description and a list of types of rubber you produce. Please provide a full list of the types of rubber (a) produced and (b) proposed to be produced at the installation using their full names and not acronyms.

**11. Process Related Raw Materials, Intermediates, Products etc.**

- (a) Provide a completed Table G.1(i) showing an exhaustive list of proposed and existing raw materials, intermediates and products used or generated at the site. Use the chemical name(s) as well as any product names, provide hazard statements and risk phrases for each item and specify the nature of the use.
- (b) Provide a statement listing the type and quantity in tonnes per annum of solvent: (i) currently used at installation and (ii) proposed to be used in the Gleitmo process.

**12. Firewater Retention**

Provide an assessment of existing arrangements and infrastructure for firewater retention at the installation against the requirements in the *Environmental Protection Agency Draft Guidance Note to Industry on the Requirements for Fire-Water Retention Facilities* when implementing Conditions 3.16.1 and 3.16.2 above.

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**13. Non-technical Summary**

In accordance with Regulation 9(2)(v) of the Environmental Protection Agency (Integrated Pollution Control)(Licensing) Regulations 2013 provide a non-technical summary of information provided in relation to the matters specified in subparagraphs (c) and (f) to (u) of Regulation 9(2).

When providing an updated non-technical summary please bear in mind that your response needs to relate to the activities at the installation as a whole and not solely to the proposed new process.

The requested information should be submitted to the Agency within **eight weeks** of the date of this notice, in order to allow the Agency to process and determine your application.

In the circumstances, you should make arrangements to have the required documents (1 signed original and 1 copy in hardcopy format, and 2 copies of all files in electronic searchable PDF format on CD-ROM) submitted to the Agency. Your response to this request should be directed to Dorota Richards, Administration Officer, Office Environmental Sustainability.

It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact Ms Maeve McHugh at the number above.

Yours sincerely



**Maeve McHugh**

**Environmental Licensing Programme  
Office of Environmental Sustainability**

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