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01 Dec 2017

**IPC Reg. No: PO465-02**

**Re: Letter of 29 June 2016 Request for Information according to Reg. 10(2)(b)(ii) of EPA(IPC) (Licensing) Regulations 2013 - Fire Water Retention Report**



Dear Mr. Clabby,

I am enclosing the Fire Water Retention Report for the BRUSS site as requested. This report was carried out following a review of the site by TMS Environment Ltd.

In addition to the TMS report I am enclosing a map of the site drainage system, with clarification provided by Sligo Co. Co on behalf of Irish Water, on the destination of all discharge points on site.

Please reference map annotation regarding process, foul and storm water discharge points from the site. One isolated section of storm water drain on site discharges to stream via the local authority storm water drainage system on Finisklin Road.

We declare that the content of the electronic files on the accompanying CD-ROM is a true copy of the original form.

Please find enclosed the following documents for review:

- 1 signed original, 1 copy
- Reg 10 Request Fire Water Retention report
- Annotated Map of the drainage system serving the BRUSS site, Sligo CoCo communication
- 2 electronic copies of all files on CD-ROM

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A Garvey'.

Anna Garvey  
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G. Bruss GmbH DICHTUNGSTECHNIK  
Finisklin Road,  
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**FIRE-WATER RISK ASSESSMENT**

**FOR**

**G.BRUSS GmbH DICHTUNGSTECHNIK  
FINISKLIN ROAD  
SLIGO**

**IPPC Licence Register Number: P0465-01**

**Ms. Anna Garvey**

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Report Ref. 24714  
TMS Environment Ltd.  
Issued: 08 November 2017

**Approved By:**



*10 Nov 2017*

Tom Ryan  
Senior Environmental Consultant

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## 1.0 Introduction

The G.BRUSS GmbH Dichtungstechnik (BRUSS) facility is operated under the terms and conditions of Integrated Pollution Prevention and Control (IPPC) Licence Register Number P0465-01 as issued by the Environmental Protection Agency (EPA) in January 2000.

Condition 9.2 of IPPC Licence Register Number P0465-01 states;

### 9.2 Firewater Retention

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

9.2.2 *In the event that a significant risk exists for the release of contaminated fire-water, the licensee shall, based on the findings of the risk assessment, prepare and implement, with the agreement of the Agency, a suitable risk management programme. The risk management programme shall be fully implemented within three months of date of notification by the Agency.*

9.2.3 *The licensee shall have regard to the Environmental Protection Agency Draft Guidance Note to Industry on the Requirements for Fire-Water Retention Facilities when implementing Conditions 9.2.1 and 9.2.2 above.*

This report presents the results of a risk assessment as required by the IPPC Licence Condition 9.2 as presented above.

## 2.0 Methodology

A Risk Assessment as defined in the *Draft Guidance Note to Industry on the Requirements for Fire-Water Retention Facilities* published by the Environmental Protection Agency is the assessment of the risk that the industrial facility poses to the environment during a fire that brings fire-water into contact with operations or substances that would cause significant pollution.

This assessment is based on facility operations and substances in place during 2017 and includes the following:

- Identification of the existing and potential hazards
- Identification of the existing control measures
- Assessment of the hazards with regard to the
  - Probability of an incident occurring
  - Impact of an incident on the environment onsite and off site

This assessment follows the 'Risk Assessment Criteria' set out in Appendix B of the (draft) Guidance and takes into account the statement in paragraph 1.1 that '*if the applicant has submitted an IPC application only part 11 of the following criteria is required.*' Part 11 is entitled '*Fire Abatement, Response, Training and Awareness*'. All of the information required under Part 11 is contained in the Company's Emergency Response Plan. A copy of the Emergency Response Plan was previously submitted to the EPA in 2014 as part of a

Licence review application. The Emergency Response Plan was upgraded in 2016 in accordance with the Agency's Guidance on Emergency Response (2016) and assessed as compliant during an EPA site visit in 2017.

### 3.0 Site Details

#### 3.1 Site Setting

The total BRUSS site area is approximately 8,500m<sup>2</sup> in size with approximately 6,800m<sup>2</sup> of covered buildings. The vast majority of the site both indoors and outdoors is concreted and all manufacturing work and most of the transport is carried out on an impervious concrete layer. The topography in the vicinity of the site is quite flat, with a gentle regional topographic gradient to the north towards Sligo Bay.

The site is located in the centre of a busy industrial park and the nearest private residences are located more than 150m west of the site.

#### 3.2 Activity

BRUSS is principally involved in the production of synthetic rubber seals for use in the automotive industry. The production process involves the conversion or moulding of pre-manufactured elastomer into precision engine seals of various dimensions and geometry. The site is licensed by the EPA to carry out the following activity class:

*Class 5.7: The manufacture of paints, varnishes, resins, inks, dyes, pigments or elastomers where the production capacity exceeds 1,000 litres per week, not included in paragraphs 5.12 to 5.17.*

#### 3.3 Site Structures

The main facility buildings are presented in Table 3.1 and a site map is presented in Appendix I and gives an overview of the buildings and the overall site layout.

**Table 3.1** List of Site Buildings the BRUSS Facility

Building / Plant Area	Function
Admin Building	Includes reception, offices, canteen, locker rooms and toilets
BU1 - Compression	Main production building where specific components works are carried out
BU2 – Profile Hall	Main production building where specific components works are carried out
BU2 – A-Ring Hall	Main production building where specific components works are carried out
BU3 – Big Injection	Injection element of works completed here
Dispatch Building	Includes Dispatch, Material Store, Tool Cleaning and Maintenance
Power-wash Area	Used to power-wash items

There are two car parks located at the front of the site on either side of the entrance.

### 3.4 Materials

Raw material, products and wastes generated at the Bruss facility are presented in Appendix II of this report. The details provided in Appendix II include the name of the material or substance, its storage location, its storage handling, whether hazardous or not, the associated environmental and safety precautions along with the CAS number and R-Phrase and S-Phrase details for each material.

### 3.5 Surface Water and Groundwater Protection

Storm water run-off from a small section of the western yard is discharged to a stream feeding into the Garavogue estuary via the local authority storm water drainage system. This drainage system is being upgraded to include a shut-off valve at the final discharge point which will facilitate stopping surface water discharging from the site through this drainage system if required in an emergency situation. The Garavogue estuary is classed by the EPA as being unpolluted.

Process effluent, storm water from roof areas, the remaining yard areas and foul sewerage from the facility is discharged to the local authority sewer line and on to the local authority waste-water treatment plant in Sligo town.

The quantity of chemicals actively in use during the production process is very small and chemicals are stored on banded pallets throughout the facility. Flammable chemicals are stored in flammable cabinets while other chemicals are stored in chemical cabinets. This significantly reduces the potential for contaminating fire water in the event of fire.

### 3.6 Spill Containment

Measures to contain spillages of liquids are in place. All containment structures have the capacity to retain 110% of the largest container. The Company have detailed procedures in the Emergency Response Plan for dealing with spillages. In the event of a spillage the response team would deal with the incident according to the documented procedures. The primary method of dealing with liquid spillages is by use of spillage booms for containment and covering with dry adsorbent of which there are stocks at various locations around the site.

It is considered that the risk of a spillage that could result in off-site contamination is minimal. The risk is proactively managed and the Company's record in this respect is excellent.

### 3.7 Fire Abatement, Response, Training and Awareness

The following systems are currently in place:

- A detailed **Emergency Response Plan** is in place with procedures for response to potential emergency situations such as Fire and Chemical Spill including emergency response teams, an emergency management structure, training and equipment maintenance



- Ref to Emergency Response Procedures and Response Plan Folder
- Refer to FER-001 for list of fire-fighting equipment and their location.
- **Fire prevention mechanisms**
  - There is a policy of limited chemical storage throughout the facility which is enforced by training, awareness, supervision and audit.
  - Fire proof cabinets are strategically located to store chemicals in stores and production areas
  - There is routine training and awareness sessions including fire and chemical spills drills.
  - A Pre-Incident Plan has been made available to the Sligo Fire & Rescue Service. The Local Chief Fire Officer has been on site and has reviewed the Fire Management Folder. The Pre-Incident Plan includes site drainage layout, site hazardous storage details, emergency contact details and quantities of chemicals stored on site. The fire alarm for the BRUSS facility is directly linked to the local fire station and will automatically notify the fire authorities in case of the alarm being activated.

#### 4.0 Risk Assessment

The assessment is based on consideration of the following four elements:

- Fire risk
- Fire load
- Environmental load
- Environmental risk

The fire risk is largely determined by the flash point, methods of storage and use, and the likelihood of ignition taking place. The fire load is a function of the quantity of material that has been ignited and the presence of other combustible materials in the vicinity to which the fire may spread. In determining the risk, account should be taken of the credibility of an event happening.

The environmental load is a function of the quantities and chemical properties of (i) the raw materials and (ii) the combusted and partially combusted materials present in fire-water. The environmental risk is dependent on the load, toxicity, the receiving environment and its sensitivity. The receiving environment will include soils, groundwater and surface waters.

#### 4.1 Fire Risk

Each building and area has been assessed for its fire risk and the results are given in Table 4.1.



**Table 4.1: Fire Risk Assessment**

<b>Building/Area</b>	<b>Fire Load</b>	<b>Fire Risk</b>	<b>Comments</b>
Admin Building	Low	Low	No hazardous substances; No ignition sources.
Main Production Building BU1	Low	Low	All flammable chemicals stored in fire cabinets, very limited quantities in use on floor Remote sources of ignition present Limited combustible materials present
Main Production Building BU2	Low	Low-Medium	All flammable chemicals stored in fire cabinets. Limited quantities of flammables in use in use in Gleitmo area Remote sources of ignition present Limited combustible materials present
Main Production Building BU3	Low	Low	All flammable chemicals stored in fire cabinets, very limited quantities in use on floor No sources of ignition present Limited combustible materials present
Dispatch Building	Medium (rubber, plastic, cardboard and waste oil)	Low	All flammable chemicals stored in fire cabinets, very limited quantities in use on floor No sources of ignition present
Power-wash Area	Low	Low	All flammable chemicals stored in fire cabinets. No sources of ignition present Limited combustible materials present

## 4.2 Environmental Risk

Appendix A of the Draft Guidance indicates the types of industrial operations that generally will require fire-water retention facilities. For convenience the relevant sections of this appendix are reproduced below.

(I) Facilities that store dangerous substances classified under the following risk phrases and which exceed storage quantities as follows:

<b>Risk Phrase Reference Number</b>	<b>Risk Phrase</b>	<b>Storage Quantity (Tonnes)</b>
R50	<i>Very toxic to aquatic organisms</i>	1
R51	<i>Toxic to aquatic organisms</i>	10
R52	<i>Harmful to aquatic organisms</i>	100
R53	<i>May cause long-term adverse effects in the aquatic environment</i>	1000

(II) Facilities whose activities involve potentially polluting substances and also discharge surface water or process effluent into receiving waters that are:

- *Upstream of drinking water intake points,*
- *Salmon fisheries,*
- *Recreational waters,*
- *Recognised shellfish waters,*
- *Ecologically sensitive waters.*

**Note:**

Industrial operations which may be covered under item (I) above will typically include the following types of activities:

### **CHEMICAL AND ALLIED PROCESS INDUSTRIES**

- *Large chemical and mixed warehousing facilities*
- *Processing of petrochemicals, and organic or organo-metallic chemical products*
- *Processing of inorganic chemicals*
- *Processing of artificial fertilisers*
- *Processing, formulation and storage of.. biocides, pharmaceuticals or veterinary products and their intermediates*
- *Processing or use of coating materials and powder coating manufacture*
- *Biocide retailing outlets (incl. co-operatives)*
- *Tyre manufacture*
- *Large scale laboratory facilities*
- ***Processing and storage of paints, varnishes, resins, inks, dyes, pigments or elastomers***
- *Manufacture of glues, bonding agents and adhesives*

The relevant elements considered for BRUSS from the content of Draft Guidance Appendix A are the risk phrases and the industry categories of the bullet points in bold above.

**Table 4.2: Environmental Risk Assessment – Aquatic Environment**

Risk Phrase Reference Number	Hazard Statement	Material	Storage Quantity & Locations	Comment
R50	H400 (R50) H410 (R50-53)	NA	NA	<u>Max Storage and Use</u> 0 Tonnes <b>Does Not Exceed</b> the quantity (1 tonne) to require fire water retention
R51	H411 (R51-53)	K3 Gleitmo SFL 9680 Gleitmo K1 RLC 3100  Waste Oil	<u>BU2 Building</u> 2L container 5L container  <u>Dispatch Building</u> 2,000L tank	<u>Max Storage and Use</u> 2.1 Tonnes <b>Does Not Exceed</b> the quantity (10 tonnes) to require fire water retention
R52	H412 (R52-53)	Gleitmo K2 RLC 3100 Gleitmo 300 Fuchs Alkon 7310 Stephenson	<u>BU2 Building</u> 1L container 4 x 30L drums 275L on banded pallet	<u>Max Storage and Use</u> 0.4 Tonnes <b>Does Not Exceed</b> the quantity (100 tonnes) to require fire water retention
R53	H413 (R53)	K3 Gleitmo SFL 9680 Osix OS 05 Amsol	<u>BU2 Building</u> 2L container 600L on banded pallet 302kg on banded pallet	<u>Max Storage and Use</u> 1.0 Tonnes <b>Does Not Exceed</b> the quantity (1000 tonnes) to require fire water retention

As can be seen from Table 4.2 BRUSS **do not** store dangerous substances classified under the risk phrases listed and which exceed storage quantities to generally require Fire Water Retention Facilities as per the EPA Guidelines.

## 5.0 Conclusions

The quantities of chemicals stored and used at the BRUSS site toxic to the aquatic environment is a fraction of quantities classified as a risk to the aquatic environment under the published Guidelines.

BRUSS has included actions to be taken to reduce the risk of fire water contamination in its Emergency Response Plan and in other environmental management procedures, which include

- The enforcement of its policy to limit storage and use of potential flammable and hazardous chemical throughout the processes and facility;
- The provision of containment, including bunding, enclosed processes, flammable and chemical storage cabinets;
- Emergency response procedures to deal with fire and spillages.

Based on the assessment and current processes and chemicals it is concluded that the risk the BRUSS facility poses to the environment during a fire to bring fire-water into contact with operations or substances that would cause significant pollution is very low.

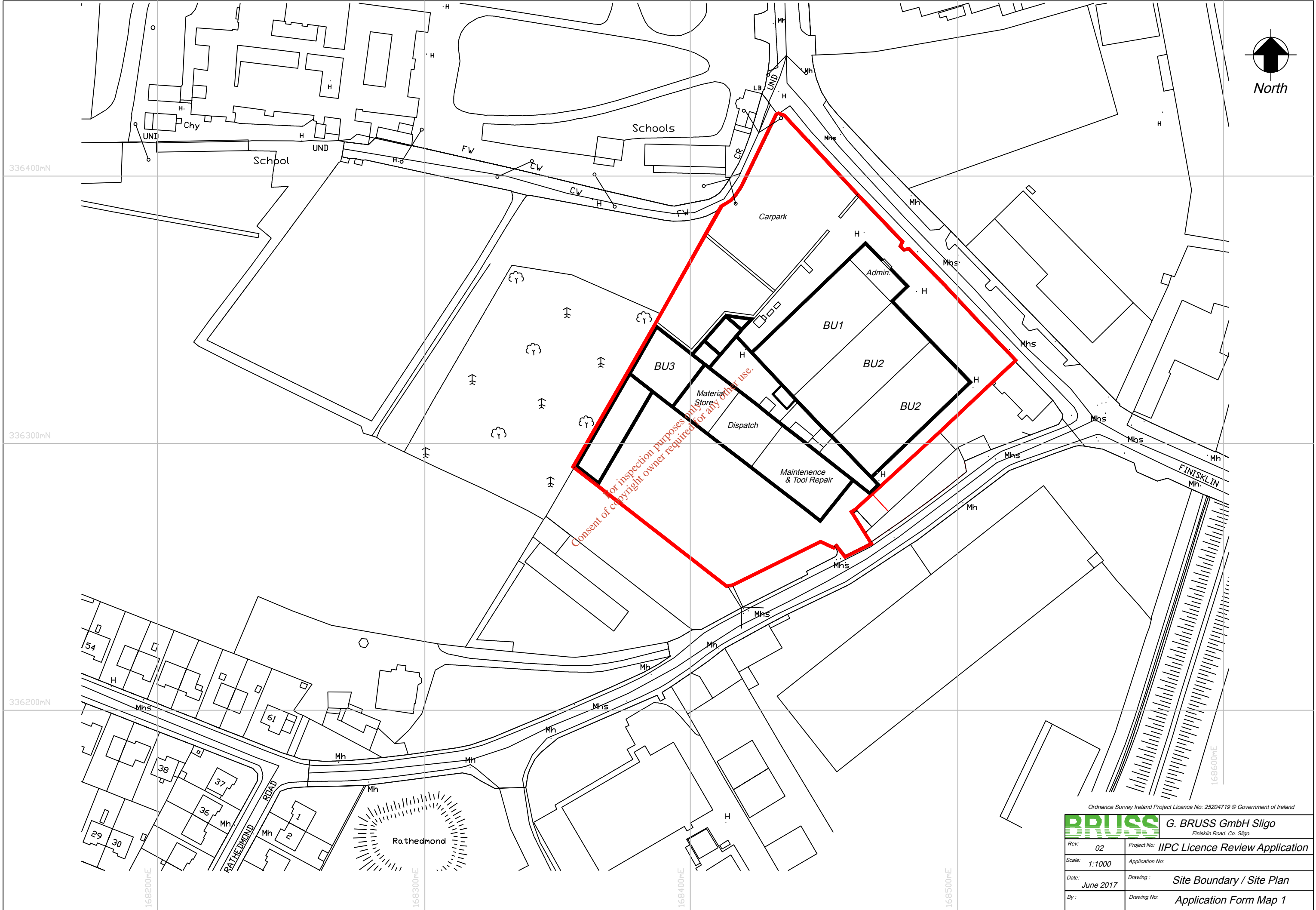
It is concluded that the BRUSS facility does not fall within the types of industrial operations that generally will require fire-water retention as per Appendix A of the EPA Draft Guidance.

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## **Appendix I**

### **Site Layout Map**

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<b>BRUSS</b> G. BRUSS GmbH Sligo Finisklin Road, Co. Sligo.	
Rev: 02	Project No: IIPC Licence Review Application
Scale: 1:1000	Application No:
Date: June 2017	Drawing: Site Boundary / Site Plan
By:	Drawing No: Application Form Map 1

## **Appendix II**

### **Raw Materials, Products and Wastes Stored at G.Bruss**

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Name	Location	Storage Handling	Quantity Stored on site (t)	H a z	Environemntal Precautions	Safety Precautions	CAS No	R-Phrase	S-Phrase
K1 Gleitmo SFL 9680	Flammable Store	Bunded Unit	0.025	Y	Do not discharge into the drains/surface waters/groundwater Do not discharge into the subsoil/soil.	VOC 80% - Keep away sources of ignition. Static discharge Vapours can form an explosive mixture with air - Cool endangered containers with water spray jet.	100-41-4 / 64742-48-9 / 1330-20-7	10,20,21,38, 65,67	36/37-62
K2 Gleitmo SFL 9680	Flammable Store	Bunded Unit	0.004	Y	Do not discharge into aquatic environment. Aquatic Acute 1 Aquatic Chronic 1	VOC 70% - Highly flammable liquid and vapour. Fire gas respiratory poison use environment-independent breathing apparatus	67-63-0	11,36,67	16,26,33, 60,9
K3 Gleitmo SFL 9680	Flammable Store	Bunded Unit	0.002	Y	Do not discharge into the drains/surface waters/groundwater. May cause long term adverse effects in the aquatic environment. Toxic to aquatic organisms.	Fire Gas: Use breathing apparatus with independent air supply. Carbon monoxide (CO) Carbon dioxide (CO2)	7758-7	60,61,38,51, 53,68,22,48, 25	53,26,28, 36,37,39, 45,57,61
Gleitmo K1 RLC 3100	Flammable Store	Bunded Unit	0.005	Y	Do not discharge into the drains/surface waters/groundwater	Fire - No special hazards arising Does not burn Residue – treat as environmental hazard	27306-76-1	51/53, 30/22	EUH032, H302, H332, H411
Gleitmo K2 RLC 3100	Flammable Store	Bunded Unit	0.001	Y	Do not discharge into the drains/surface waters/groundwater. Prevent spread over a wide area (e.g. by containment or oil barriers).	Hazard arising – Isocyanate Nitrogen oxides (NOx) Carbon monoxide (CO) Hydrogen cyanide (HCN)	None	20, 37, 43, 52/53	H332, H317, H335, H412
EWO Mould 6450	Flammable cabinet A-Ring Hall	Bunded Unit	0.050	Y	Hazardous to the aquatic environment: Aquatic Chronic 4. long lasting harmful effects to aquatic life Do not allow to enter into surface water or drains. Do not allow to enter into soil/subsoil.	Flammable liquid and vapours. Uncontrolled release,- Danger of explosion	64-17-5	53/62	36/37,46, 51,62
Gleitmo 300 Fuchs	Flammable Store	Bunded Unit	0.060	Y	Harmful to aquatic life with long lasting effects	VOC 91% - Flammable liquid and vapour.	67-63-0 64742 46-9	10, 65, 66,11 67, 36, 52/53	H226, HH336, H412, H304



### Hazardous & Bulk Stored Materials Inventory 2017

Ref: EHSR 028  
Rev: 01  
Date: 18.09.2017

Name	Location	Storage Handling	Quantity Stored on site (t)	H a z	Environemntal Precautions	Safety Precautions	CAS No	R-Phrase	S-Phrase
Osixo OS 05	Chemical Store	Bunded Pallet	0.600	N	Collect contaminated fire extinguishing water separately. Do not allow entering drains or surface water. Water contaminating class D. Not easily biodegradable	Thermal decomposition Fluorinated compounds CO CO2 polymer fume fever FIRE danger of bursting containers, cool with water.	163702-087	53	no data
Getren M2200	Chemical Store	Bunded Pallet	0.050	Y	Do not allow to enter drains or waterways. Do not discharge into the subsoil/soil. Low water hazard.	FIRE - Carbon monoxide, carbon dioxide, silicon dioxide can be released.	9043-30-5	No	No

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### HAZARDOUS & Bulked Stored Materials Inventory 2017

Ref: EHSR 028  
Rev: 01  
Date: 18.09.2017

Name	Location	Storage Handling	Quantity Stored on site	Haz Y/N	Environmental Precautions	Safety Precautions	CAS No	R-Phrase	S-Phrase
DKW W-3794E	Chemical Store	Bunded Pallet	0.400	N	Prevent entry to sewers and public waters. Classified non-haz .	none	None	None	None
DKW W4080	Chemical Store	Bunded Pallet	0.400	N	Prevent entry to sewers and public waters. Classified non-haz .	none	None	None	None
DKW W71D	Chemical Store	Bunded Pallet	0.400	N	Prevent entry to sewers and public waters. Classified non-haz .	none	None	None	None
ALKON 7310 Stephenson	Chemical Store	Bunded Pallet	0.275	Y	Do not discharge into drains or rivers. Readily absorbed into soil. Is Biodegradable. Toxicity: Fish 96H LC50	In combustion emits toxic fumes.	3088-31-1	36,37	H318, H412, H312
Korro 60-90 Graf	Chemical Store	Bunded Pallet	0.125	Y	Do not allow to enter into soil/subsoil. Do not allow to enter into surface water or drains. Use water spray jet to minimise or disperse vapours	FIRE - Carbon monoxide, carbon dioxide, may be released	11-46-6	22, 60, 61	H302, H373, H360FD
Gleitmo 300 Fuchs	Flammable Store	Bunded Unit	0.060	Y	Harmful to aquatic life with long lasting effects	VOC 91% - Flammable liquid and vapour.	67-63-0 64742-46-9	10, 65, 66, 11, 67, 36, 52/53	H226, HH336, H412, H304
Amsol	Flammable Store	Bunded Unit	302kgs		Do not allow to enter into soil/subsoil. Do not allow to enter into surface water or drains. Water hazard class 1. Bioaccumulative potential : The product is lighter than water	Flammable liquid and vapour. FIRE - Carbon monoxide, carbon dioxide, may be released	90622-57-4	65, 66 H226, 331, 304, 413	2, 23, 24, 51, 61, 62
Struktol Permaseal 20	Flammable Store	Bunded Unit	0.084	Y	Do not allow to enter into surface water or drains. Aquatic Toxicity: EC10	Extremely Flammable Aerosol	64741-65-7 74-98-6 106-97-8 67-63-0	11, 12, 36, 65, 66, 67	H225, H304, H331, H280, H220, H360, H319

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Name	Location	Storage Handling	Quantity Stored on site (t)	Haz Y/N	Environmental Precautions	Safety Precautions	CAS No	R-Phrase	S-Phrase
Hydrochloric Acid Dilute 1mol/l	Maintenance Tool Cleaning	Flammable cabinet Tool Clean	0.007	Y	Discharge into the environment must be avoided. Bioaccumulative potential Partition coefficient: n-octanol/water:	pH <1 Corrosive. FIRE: Pyrolysis products, toxic.	7647-01-0	34, 37	H290, H314, H355
Phenolphthalein Solution VWR	Maintenance Tool Cleaning	Flammable cabinet Tool Clean	0.150	Y	DO NOT empty into drains - risk of explosion. Cover Drains, collect bind and pump off spills.	Flammable Liquid and vapour. Carcinogenic Cat. 2, Mutagenic Cat.3	77-09-8	45, 10, 68	H350, H226, H341
Q8 Haydn 68 Distillates (Petroleum) Solvent, dewaxed	Oil Store Moulding Machines	Not classified	0.600	N	Avoid dispersal of spilt material and runoff and contact with soil, waterways, drains and sewers	Thermal decomposition carbon dioxide carbon monoxide sulfur oxides Container may burst	647-42-65-0	None	None
Q8 Haydn 46 Distillates (Petroleum) Solvent, dewaxed Heavy Parafinic	Oil Store Moulding Machines	Not classified	0.416	N	Avoid dispersal of spilt material and runoff and contact with soil, waterways, drains and sewers	Thermal decomposition carbon dioxide carbon monoxide sulfur oxides Container may burst under pressure	647-42-65-0	None	None
North Sea Anti-Freeze (Blue) Ethylene Glycol	Oil Store	Bunded Pallet	0.600	Y	Avoid release to the environment	Do not enter fire area without proper protective equipment, including respiratory protection	107-21-1 56-81-5 19766-89-3	63, 22	H302, H361d
North Sea Anti-Freeze (Orange) Monoethylene glycol)	Cooling Tower Area	Bunded Pallet	1.000	Y	Avoid release to the environment	Do not enter fire area without proper protective equipment, including respiratory protection	107-21-1 19766-89-3	22, 63	H302, H373, 361d
Argon (Compressed)	Maintenance Shed	Compression Cylinder: Chained Unit	1.000	Y	Not Environmentally Harmful. Do not discharge into any place where its accumulation could be dangerous	Can cause rapid suffocation. Contains gas under pressure; may explode if heated	7440-37-1		H280
Methylated Spirits	Flammable Store	Bunded Unit	0.040	Y	Cover all drains and sewers. Avoid spreading spilled material	During fire, toxic gases (CO, CO2) are formed. Unusual Fire & Explosion Hazards HIGHLY FLAMMABLE Vapours are heavier than air and may spread near ground to sources of ignition.	64-17-5 67-56-1 548-62-9 8012-95-1	39/23/24/25 20/21/22, 11	H228, H302, H312, H332, H370

Name	Location	Storage Handling	Quantity Stored on site (t)	Haz Y/N	Environmental Precautions	Safety Precautions	CAS No	R-Phrase	S-Phrase
Jizer Degreser JIZ609	Chemical Store	Bunded Pallet	0.015	Y	Do not discharge into drains or watercourses or onto the ground. Acute Aquaticm toxicity : >100mg / l Not classified as Env. Hazard	Vapours in high concentrations are anaesthetic. Combustion: CO. CO2 formation..	64742-47-8 69011-36-5	66, 65, 41	H304, H318, EUH066
Hoeschalin 821	Maintenance Tool Cleaning Chemical Store	Bunded IBC	2.500	Y	Do not allow to enter drainage system, surface or ground water. Dilute with much water. May raise pH of waterways. Water Haz Class 1.	Potassium Hydroxide - pH 14 – severe corrosive, Thermal decomposition can produce a variety of compounds Strong exothermic reaction with acids	1310-58-3 111-77-3	35,63, 22	H314, HH302, H361d
Rubber Compound	Material Store	Plastic / Steel Bins	200.00	No	In the case of FIRE and combustion of material - gross environmental damage, emissions to atmosphere.	Public Health Issues			
<b>Packaging (Bulk Storage)</b>									
Cardboard K2 box	Connecting Corridor	Shelving	12 Pallets	No	Combustibles	Combustibles			
Cardboard K3 box	Connecting Corridor	Shelving	3 Pallets	No	Combustibles	Combustibles			
Cardboard IMC Box	Connecting Corridor	Shelving	3 Pallets	No	Combustibles	Combustibles			
Cardboard GM Box	Connecting Corridor	Shelving	3 Pallets	No	Combustibles	Combustibles			
Cardboard VW Box	Connecting Corridor	Shelving	6 Pallets	No	Combustibles	Combustibles			
EURO Pallet 1200x1000	Rear Entrance Dispatch	Stacked	60 Pallets	No	Combustibles	Combustibles			
Standard Pallet 1200x800	Rear Entrance Dispatch	Stacked	100 Pallets	No	Combustibles	Combustibles			
Returnables Plastic Scania	Rear Entrance Dispatch	Outdoor	60 Pallets	No	Combustibles	Combustibles			
Returnables Plastic FORD	Rear Entrance Dispatch	Outdoor	6 Pallets	No	Combustibles	Combustibles			
Returnables Plastic VW	Rear Entrance Dispatch	Outdoor	5 Pallets	No	Combustibles	Combustibles			
Returnables Plastic Bosch	Rear Entrance Dispatch	Outdoor	2 Pallets	No	Combustibles	Combustibles			

Name	Location	Storage Handling	Quantity Stored on site (t)	Haz Y/N	Environmental Precautions	Safety Precautions	CAS No	R-Phrase	S-Phrase
<b>WASTE Storage</b>							<b>Waste Code</b>		
Solid Oven Waste	Waste Store	Bund	1.200 (4 x 210 ltr Drums)	Y	In the case of FIRE and combustion of material - gross environmental damage, emissions to atmosphere.	Public Health Issues	07 08 99		
Waste Oil	Waste Oil Tank	Double skined - Bunded	2.000	Y	Avoid dispersal of spilt material and runoff and contact with soil, waterways, drains and sewers	Thermal decomposition carbon dioxide carbon monoxide sulfur oxides Container may burst	13 02 08		
Contaminated Hoeschalin – Caustic	Maintence Tool Cleaning /Waste Store  Waste Store	IBC on Bund	1.500  IBC	Y	Do not allow to enter drainage system, surface or ground water. Dilute with much water. May raise pH of waterways. Water Haz Class 1.	Potassium Hydroxide - pH 14 – Severe corrosive Thermal decomposition can produce a variety of compounds Strong exothermic reaction with acids	06 02 04		
Empty Containers - mixed	Waste Store	Bund	1x1000ltr BOX	Y	Burst Risk under Thermal pressure	Residue of chemicals, vapours – thermal decomposition risk, burst risk	15 01 10		
VOC Soaked rags	Waste Store	Plastic Sealed - on bund	0.100 (2 x 120ltr Drums)	Y	Flammability Risk	Fire Gas: Use breathing apparatus with independent air supply. Carbon monoxide (CO) Carbon dioxide (CO2)	16 05 07		
Waste Rubber	Left Side of Building	F-IBC	2.300 (Skip)	N	In the case of FIRE and combustion of material - gross environmental damage, emissions to atmosphere.	Public Health Issues	07 02 99		



### HAZARDOUS & Bulk Stored Materials Inventory 2017

Ref: EHSR 028  
Rev: 01  
Date: 18.09.2017

Name	Location	Storage Handling	Quantity Stored on site (t)	Haz Y/N	Environmental Precautions	Safety Precautions	CAS No	R-Phrase	S-Phrase
Oily Rags	Waste Store	Bund	0.200 BOX  0.500 (8 Yellow bins)	Y	Flammability Risk	Thermal Decomposition products may include the following materials: carbon dioxide carbon monoxide sulfur oxides	15 02 02		
Empty Containers – Osixo OS O5	Waste Store	Bund	Pallet	Y	Do not allow to enter into surface water or drains.	Thermal Decomposition - Fluorinated compounds. Carbon monoxide. Carbon dioxide Containers classified as a Hazardous Waste	Returned to Manufacturer for reuse		
Cardboard	Waste Store	Baled	4 Bales		Combustibles	Combustibles	15 01 01		
Plastic	Waste Store	Baled	4 Bales		Combustibles	Combustibles	20 01 39		

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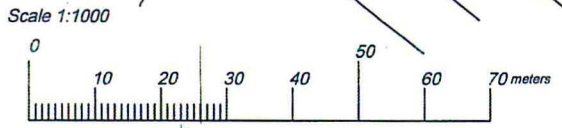
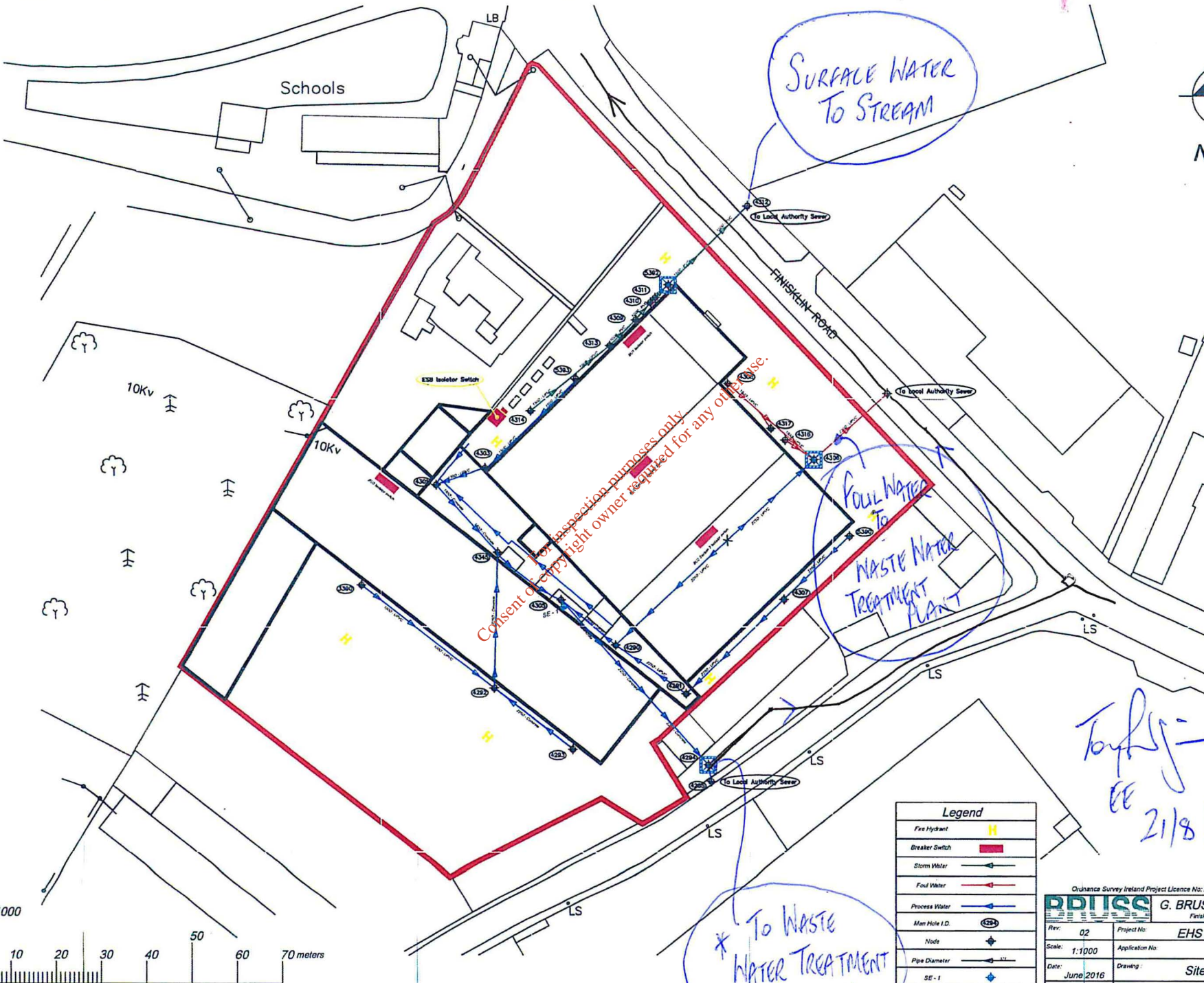


**ATTACHMENTS**

Table of Contents

<b>ATTACHMENT</b>	<b>CONTENTS</b>
ATTACHMENT 1.A	SLIGO CO. CO ANNOTATION OF BRUSS SITE DRAINAGE DWG, AND ACCOMPANYING COMMUNICATION

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Legend	
Fire Hydrant	⚡
Breaker Switch	■
Storm Water	→
Foul Water	→
Process Water	→
Man Hole I.D.	⊕
Node	⊕
Pipe Diameter	→
SE - 1	⊕
Drain Rock Point	■

Ordnance Survey Ireland Project Licence No: 25201227 © Government of Ireland	
<b>BDISS</b> G. BRUSS GmbH Sligo Finskin Road Co. Sligo	
Rev: 02	Project No: EHS Response Plan
Scale: 1:1000	Application No:
Date: June 2016	Drawing: Site Services Plan
By: T. F.	Drawing No: DRG 2014.028

*Toplogy*  
*EE*  
*21/8/17*

---

**FW: BRUSS query**

---

**Enda Killoran** <ekilloran@sligococo.ie>  
To: "anna@bruss.ie" <anna@bruss.ie>  
Cc: Karen Elliott <kelliott@sligococo.ie>

Mon, Aug 21, 2017 at 12:03 PM

Hello Anna,

See response to your query prepared by the Water Services Section of Sligo County Council.

Regards

Enda

---

**From:** Tony Parkinson  
**Sent:** 21 August 2017 09:50  
**To:** Enda Killoran  
**Subject:** FW: BRUSS query

Enda

See attached notes on drawing highlighting the drainage locations.

Regards

**Tony Parkinson****Executive Engineer****Water Services****Sligo County Council**

---

**From:** Noel Haran  
**Sent:** 14 August 2017 14:00  
**To:** Tony Parkinson

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**Cc:** Fineen O'Driscoll  
**Subject:** FW: BRUSS query

Tony,

Can you review below with Owen and draft reply.

Thanks,

Noel

---

**From:** Enda Killoran  
**Sent:** 14 August 2017 13:36  
**To:** Fineen O'Driscoll  
**Cc:** Noel Haran  
**Subject:** FW: BRUSS query

Hello Fineen/Noel.

The query below came in from Bruss. Do water Services have any details/drawings re the sewerage system/surface water drainage system for the area?

Regards

Enda

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---

**From:** Karen Elliott  
**Sent:** 14 August 2017 13:05  
**To:** [anna@bruss.ie](mailto:anna@bruss.ie)  
**Cc:** Enda Killoran; Enviro; Geraldine Healy  
**Subject:** FW: BRUSS query

Hi Anna

Thanks for your email received during my annual leave. I have forwarded your email to Enda Killoran for his consideration.