

## SECTION A - NON-TECHNICAL SUMMARY

### Non-Technical Summary of IPPC Licence Application

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 should be included in the non-technical summary:

A description of:

- the installation and its activities,
- the raw and auxiliary materials, other substances and the energy used in or generated by the installation,
- the sources of emissions from the installation,
- the conditions of the site of the installation,
- 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 not possible, reducing emissions from the installation,
- where necessary, measures for the prevention and recovery of waste generated by the installation,
- 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 the application of best available techniques (BAT);
  - (b) no significant pollution is caused;
  - (c) waste production is avoided in accordance with Council Directive 75/442/EEC of 15 July 1975 on waste; where waste is produced, it is recovered or, where that is technically and economically impracticable, it is disposed of while avoiding or reducing any impact on the environment;
  - (d) energy is 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.

Supporting information should form **Attachment N<sup>o</sup> A.1**

## ATTACHMENT No. A.1 – NON – TECHNICAL SUMMARY

### 1. The Installation and its Activities

Devcon Ltd is the European manufacturing facility for ITW Chemical Construction Products and Engineered Polymers Group. ITW Shannon was first established in Shannon in 1965 and is located in Bay 150 (comprising 45, 000 sq. ft) of the Shannon Industrial Estate. The manufacturing facility was custom designed for the process.

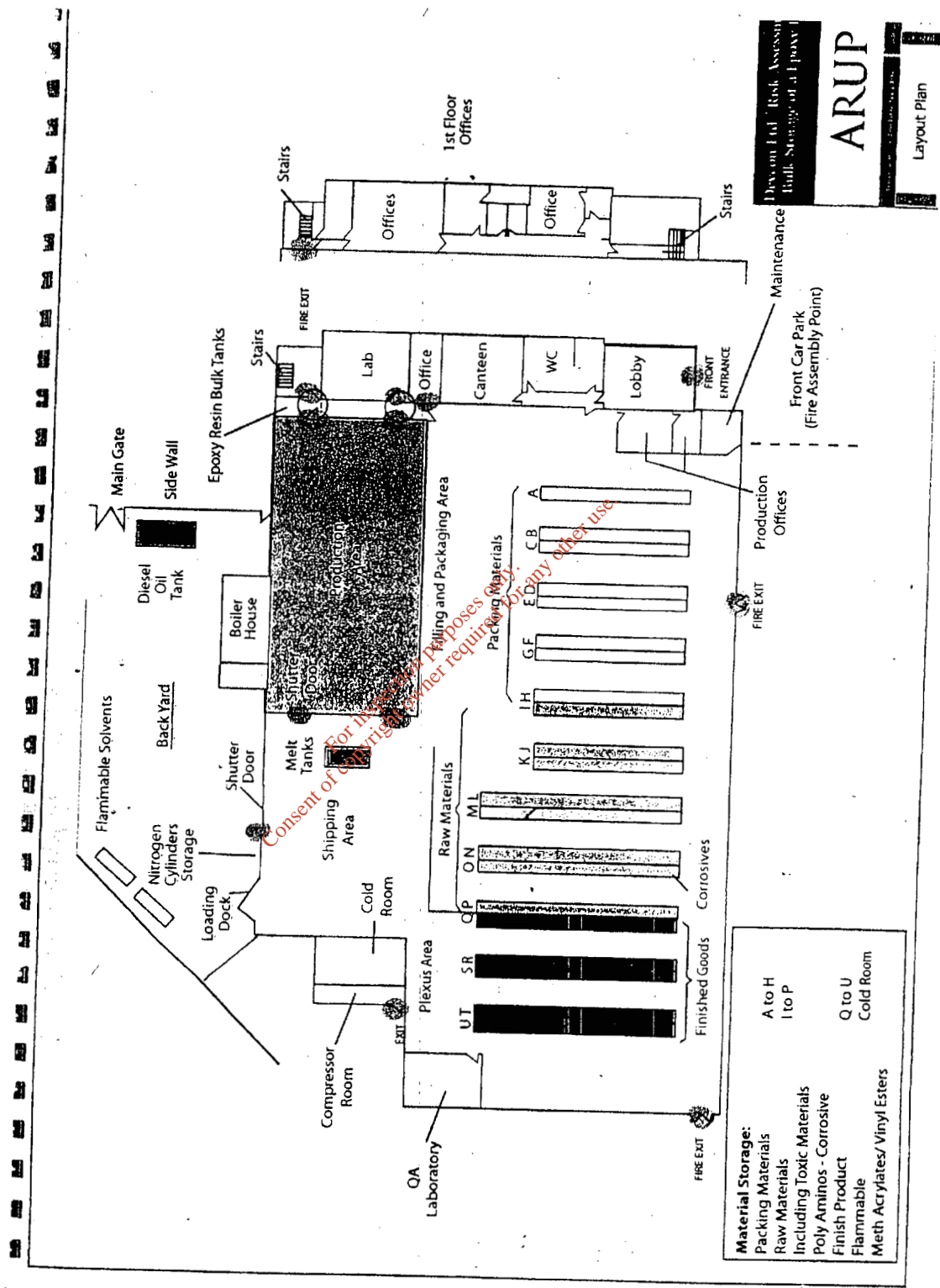
The company has a total of 53 employees with approximately 10 seasonal employees. Thirty-four are employed in production, with the remainder providing technical and administrative support. The company operates a five-day week and the normal operating hours are between 8.30am and 5.00pm.

The facility produces adhesive surface-coatings, sealants, metal treatments, tapping products and chemical anchoring materials. The products are categorised as epoxies, vinyl esters and polyurethane resins and are all used in all aspects of industry, from high technology applications to general maintenance and repairs in industry. One is the simple blending of resins, solvents and fillers, whereas the other is a reaction process of polyols and isocyanates, which produces a polyurethane pre-polymer. Approximately 2,839.5 tonnes of product are produced annually. However, only 246.1 tonnes of the total output is produced by the 'reaction' process.

All manufacturing is carried out in an 'ex' rated Zone 2 area, and all products are manufactured according to BS7570 Part 2 (1987) / ISO 9002 / EN29002 standards.

Please see below for a plan of the facility. All plans are as submitted in the original application, made on the 29<sup>th</sup> November 1995.





- Material Storage:**
- Packing Materials
  - Raw Materials
  - Including Toxic Materials
  - Poly Aminos - Corrosive
  - Finish Product
  - Flammable
  - Meth Acrylates/ Vinyl Esters
- A to H  
I to P  
Q to U  
Cold Room

Division Ltd Risk Assessment  
Bulk Storage of a Liquid

# ARUP

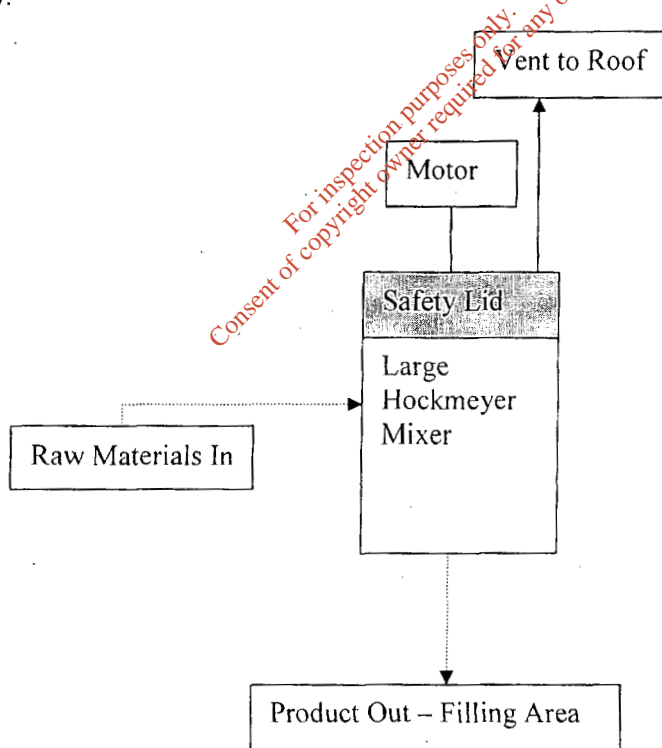
Layout Plan

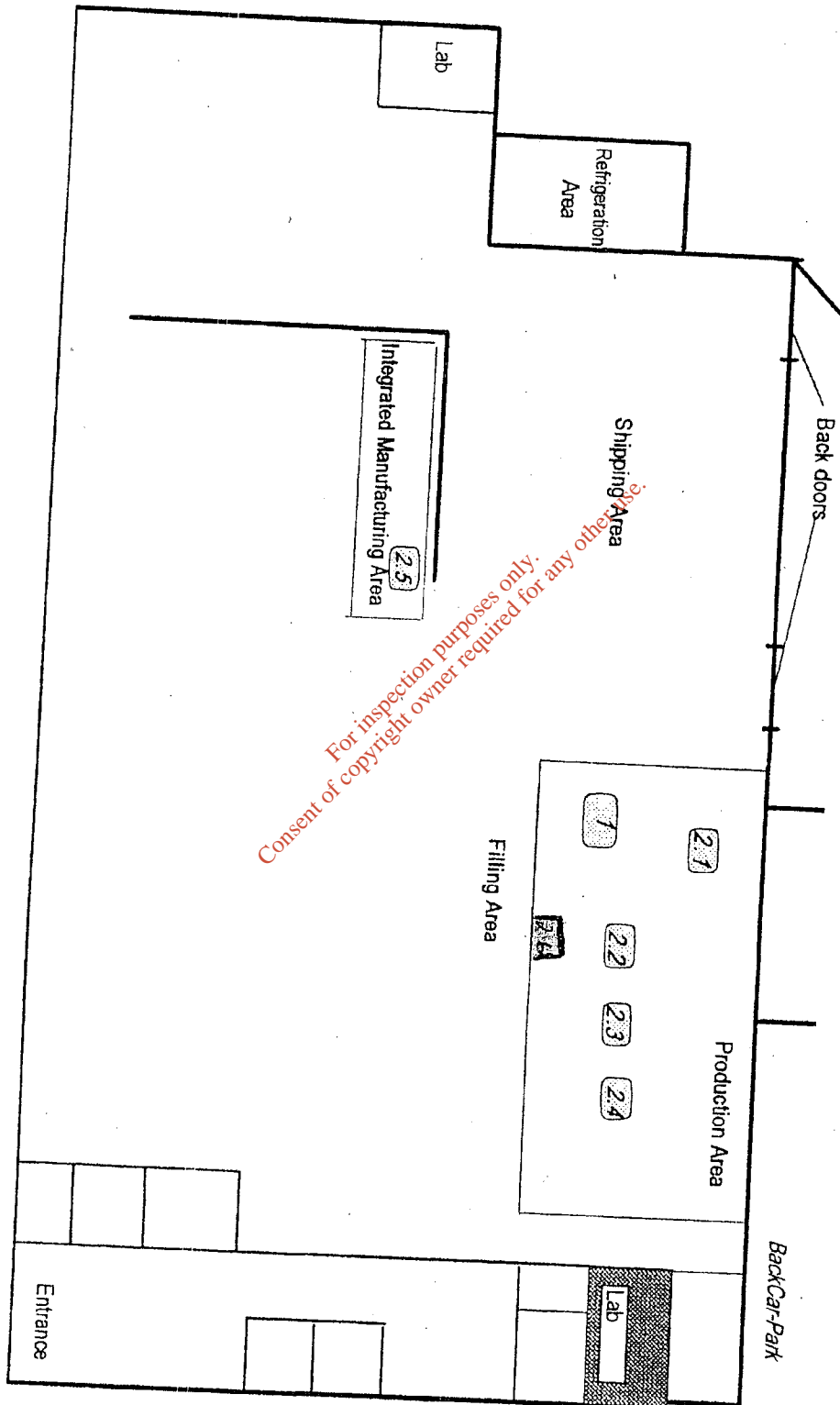
## 2. Unit Process Locations

Please see below for a revised plan of unit process locations (Page 4). There is an additional mixer to the original application (Attachment 9, page 4). The unit processes are now as follows:

Unit Process	Label	Location
Reactor	1	Production Area
Sussmeyer Mixer	2.1	Production Area
Hydrosolver Mixer	2.2	Production Area
Torrance Mixer	2.3	Production Area
Ross Mixer	2.4	Production Area
Small Hockmeyer	2.5	Integrated Manufacturing Area
Large Hockmeyer	2.6	Production Area

This is marked as 2.6 in the Production area on the following plan (Page 4). The mixer marked 2.6 is called a Large Hockmeyer, and the flow-diagram for this is below.







OFFICE OF CLIMATE,  
LICENSING  
& RESOURCE USE

## FILE NOTICE

Material relating to **ITW Performance Polymers** has been removed from this file.

Any queries on this matter can be directed to:

Licensing Unit  
Office of Climate, Licensing & Resource Use  
Tel. 053-9160600

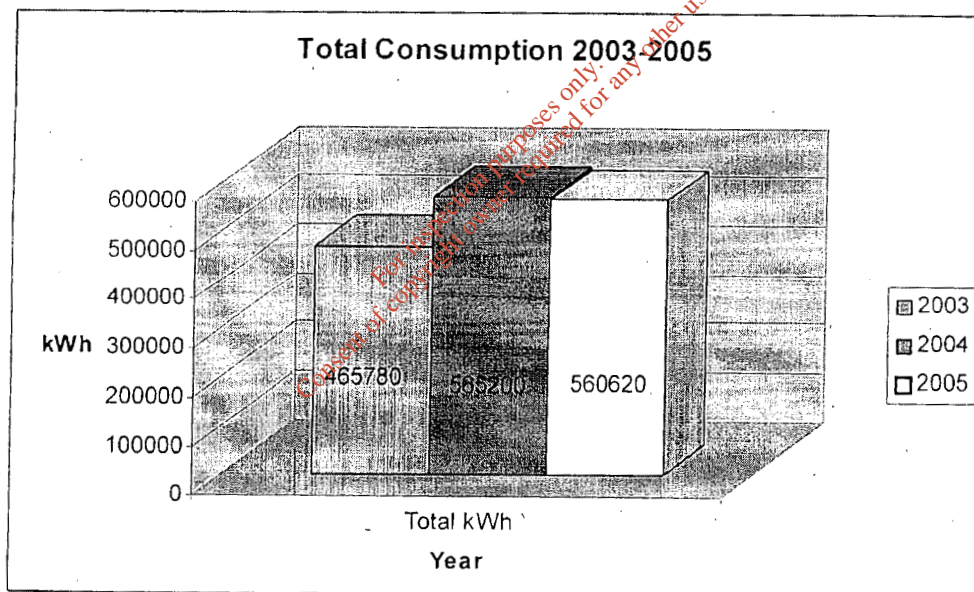
Request No.: No. 4

Date: 4<sup>th</sup> September 2009

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#### 4. Energy Usage

Energy usage has not been previously tracked and as such there is not a lot of data to report. However, the company have joined the Energy Extra website (created by ESB) to help us track our energy usage. The following is the available data:



**5. Waste**

All waste generated at ITW Devcon is consigned to specific streams, depending on the nature of the waste being disposed. These streams have changed since our original licence decision. This is due to companies closing down, and financial reasons. All disposal companies are fully licensed as can be seen below. The details are as follows:

**GENERAL WASTE DISPOSAL**

Licensee	Devcon Ltd.	
Licence Register Number		P0072-2
EWC Code		080499
Hazardous Y/N	N	
Location of Disposal/Recovery	Gortnadroma Landfill Site, Limerick. Waste Licence 17-2	
Waste Disposal Contractor	Veolia Ltd.	
Waste Collection Permit Number	WCP/LK/051/02b	
EPA Waste Licence	82-1	

**PAPER**

Licensee	Devcon Ltd.	
Licence Register Number		P0072-2
EWC Code	08 04 99	
Hazardous Y/N	N	
Location of Disposal/Recovery	Alternative Waste Solutions Limited, UK Permit No EX280450	
Waste Disposal Contractor	Clean Ireland Refuse & Recycling Co. Ltd.	
Local Authority Permit Number	010/02/WP/CL	

**METAL**

Licensee	Devcon Ltd.	
Licence Register Number		P0072-2
EWC Code	08 04 99	
Hazardous Y/N	N	
Location of Disposal/Recovery	Aceralia Redondos Commercial SA - Steel Mill, Spain	
Waste Disposal Contractor	Cork Metal Recycling	
Local Authority Permit Number		08/01

**TIMBER & CARDBOARD**

Licencee:	Devcon Ltd	
Licence Reg No:		P0072-2
EWC Code:	08 04 99	
Hazardous Y/N:	No	
Location of Disposal/Recovery:	Off site recovery.	
Waste Disposal Contractor:	Clare Waste, Tuamgraney, Co.Clare	
Waste Permit No:	012/02/WP/CL	
Waste Collection Permit No:	WCP/LK/016/02B	

**SOLVENT WASTE**

Licencee:	Devcon Ltd
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Licence Reg No:  
 EWC Code: Varies  
 Hazardous Y/N: Varies  
 Location of Disposal/Recovery: Varies  
 Waste Disposal Contractor: ENVA  
 Waste Licence W0041-01

90% of all waste generated in the production process is re-worked. No water is used in the process, and therefore the risk of water pollution does not exist. Dust collection and extraction systems are in place throughout the facility. Solid inert waste is disposed of off-site in a suitable landfill site, and all hazardous waste is disposed of by a licensed operator. Disposal certificates are available for all treated waste. We operate the Schutz ticket system for all IBC's, whereby they are returned to our supplier for re-use. All waste pallets, cardboard, paper, glass, aluminium cans, and printer cartridges are recycled. Much of our hazardous waste is recovered. Please see the table below for the figures for 2004 and 2005.

Waste Type	Amount in Kg	
	2004	2005
Cardboard	19760	19000
General Waste	84.69	80.22
Paper	709.6	674
Timber	39590	58060
Metal	51060	83940
Solvent waste	55380	50530

As stated previously, all cardboard, paper, timber and metal waste is sent off-site to be recycled. Of the hazardous waste, the following figures are reported.

Kg	2004	2005
Recycled	111979.6	161674
Recovered	38000	39720
Disposed	17464.69	10710.22

## 6. Air Emissions

We monitor for Mercaptans and TA Luft Organics Class I, II and III bi-annually. We monitor for particulates quarterly. Our detected levels have always been well below any limits set and this year has been no exception. VOC emissions to atmosphere are measured by sampling and analytical technique based on a NIOSH method (Method No. 2500). Particulates are measured by particulate sampling and analytical technique based on a NIOSH Method (Method No. 0500).

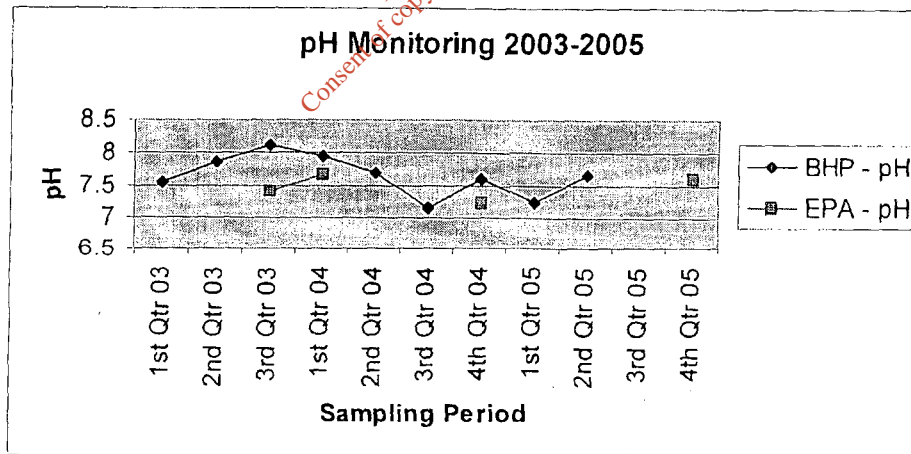
Please see table 7 below for results for Air Monitoring for 2005. Figures are given in mg/Nm<sup>3</sup> (where N = Normalised).

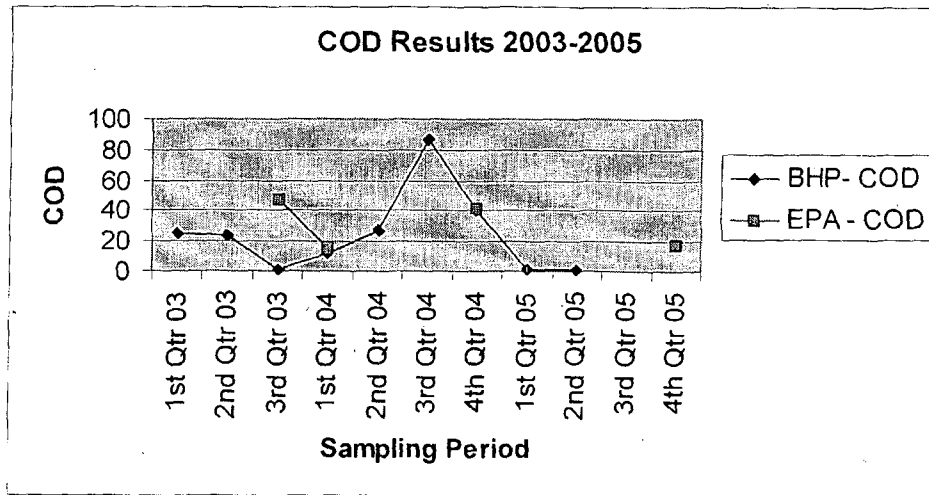
	S1	S2	S3	S4	LIMITS
Particulates	0.0013	0.0008	0.0008	0.0007	10
Mercaptans	1.37	1.38			2
TA Luft MEK	19.7				275
TA Luft Trichloroethylene	39.9				275

All emissions to atmosphere have been calculated for the Pollutions Emissions Register, submitted as part of the AER 2005.

### 7. Water Emissions

There are no emissions to water from ITW Devcon. We carry out surface water sampling and test for Temperature, COD, and pH quarterly. There are no limits in our current licence, but we have established action limits with our test laboratory for our own interests. We have a shut off valve in place, so that in the unlikely that there is a spillage to surface water drains, it can be prevented from entering the local water systems. There has never been such a spill at ITW Devcon. All methods for testing are from Standard Methods for the Examination of Water and Wastewater, 20<sup>th</sup> Edition. The Standard reference for the COD is APHA – 5220 – D. The Standard Reference for the pH is APHA – 4500 – H<sup>+</sup> -B.





### 8. Further Measures

We use bag-house filters on our particulate emission point to cut down on dust emissions from ITW Devcon, as stated in original application (Attachment 12, Page 13). We use Activated Charcoal Filters on our Mercaptan Emission point, as stated in original application (Attachment 12, Page 14).

Fugitive Emissions: All procedures in place at the time of the original application are still in place. In addition to these, we now have 2 Epoxy Resin Tanks in the back yard. There is a procedure in place to protect surface water contamination from any spillages. This states that before any unloading of the epoxy to the tanks, all surface water drains are covered with specifically designed drain covers.

### 9. Quality and H&S

ITW Devcon is accredited to ISO 9001:2000. As such, all procedures are audited on an annual basis by our certification body, and regularly internally also. We also have a H&S Management System in place. The Emergency Response Procedures are outlined in **Attachment No. F**.

A copy of our ISO Certificate is also attached here: **Attachment A.2**.

Attachment A.2



# Certificate of Registration

## QUALITY MANAGEMENT SYSTEM

**ITW Performance Polymers Europe  
Bay 150 Shannon Industrial Estate  
Shannon  
Co. Clare  
Ireland**

*Operate a Quality Management System  
which complies with the requirements of  
**BS EN ISO 9001:2000**  
for the activities detailed in the scope of registration.*

Certificate No: **Q 05420**

For and on behalf of BSI:

Managing Director, BSI Management Systems (UK)

Originally registered: **22/03/1988**



This certificate is not the legal certificate and is for presentation purposes only.  
Refer to the legal certificate for full details of schemes and scopes.  
This certificate remains the property of BSI and is bound by the conditions of contract.

The British Standards Institution is incorporated by Royal Charter.  
Management Systems (UK) Headquarters: P.O. Box 9000, Milton Keynes MK14 6WT. Tel: 0845 060 9000



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