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Eirtech Aviation Limited
Hangar 3,
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21 March 2011

Eirtech Aviation Ref: Env – D - 2011 – 4

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IPPC Licence No:	P0921-01
Company	<i>Eirtech Aviation Limited</i>
Subject	Response to request for information in EPA letter reference dated 11 th February 2011

Dear Ms. Keavey,

In response to your request for information relating to the Eirtech Aviation Limited IPPC Licence application form (EPA reference dated 11th February), I would like to submit the following information.

- Clarify how you intend to comply with Solvent Regulation (S.I. No 543 of 2002) in particular Schedule 3 Reduction Scheme and Articles 9 and 10.....
If recalculations results in non compliance with reduction scheme submit details of plan to achieve compliance.

Attachment E1 of the application for the IPPC Licence includes the Solvent Management Plan for Eirtech Aviation Ltd. This document reports on reductions in the use and emission of Volatile Organic Compounds (VOCs) achieved at Eirtech Aviation Limited over recent years at the Shannon facility. The Shannon site carries out the same processes as the Dublin site. The Shannon site was previously known as a Lufthansa Technik Aircraft Painting, IPPC Licence No. P0497-02. We are currently in the process of applying for an IPPC Licence for the Dublin facility, application Reg. No. P0921-01. Both the Shannon and Dublin facilities carry out operations under the current Solvent Management Programme for 2010/2011. The EU Solvent Emission Directive sets targets ratio Solvent emitted/ Solids used in the aerospace coatings sector (Annex IIB). Values for this ratio at Eirtech are compared with the EU Targets. (4.93 in 2000-2001 years and 1.54 in 2010). These figures show that Eirtech has implemented significant VOC reductions and is in compliance with Best Available Technique (BAT) in relation to VOC management.

Further targets and options for VOC reductions in Eirtech are included in the Solvent Management Plan and these include:

- Improving General Work Practise in the Painting Department including minimization of and improved management of paint and solvent waste and other materials use in process.
- Substitution with lower VOC paint materials

During 2011 we will as a part of the Environmental Management System (EMS) determine the suitability of the existing containment system.

Currently Eirtech Aviation Limited recommends the use of high solids paints as its default paint type with low VOC. Some of the paints are water based products, which significantly lower VOC emissions. Using the water based products means water evaporates instead of the VOC, leaving only high solid paints. Calculations made to show compliance for Eirtech with the solvent directive assume loss to water (O2) to be negligible. (S.I No 543 of 2002, Schedule 6).

- Provide an estimate of annual water consumption data and the name of the Water Service Authority.

Fingal County Council through Dublin Airport Authority is the Water Services Authority. Based on data provided by DAA to Eirtech, estimate of annual water consumption will be 400 m³/year.

- Provide an estimate of waste (hazardous and non hazardous) generated annually and estimate of the percentage of waste to be landfill or recycled/recovered

See Table "Waste Produced in 2010- Eirtech Aviation Ltd Dublin" in Attachment No.1

- Provide a baseline groundwater survey for the site, if data is available. In particular, provide a map of all groundwater wells in the vicinity of Hangar 3 including groundwater well GW011. Confirm that there no impact on GW001 from Historical contamination at GW011, if there is, provide details of remediation plans;

Maps showing baseline groundwater survey for the site are attached to the letter. Figure 2 present – Deep well Groundwater Contour Plan and Figure 3 present – Shallow Well Investigation (See Attachment No.2)

In relation to their query on GW001 and GW011 - based on maps and knowledge URS engineers, these wells are not located near to Hangar 3 and appear to have no relevance to operations there (they are actually some distance across hydraulic gradient in either direction from Hangar 3).

Well GW011 (down on the ramp at hangar 5) no longer exists, SR Technics remediated this well and decommissioned it on the orders of the EPA before it transferred the IPPC Licence Register No. P 0480-02 to Dublin Aerospace.

GW001 is located to the North West side and it is not part of Eirtech Aviation Ltd site. That area is a part of Dublin Aerospace IPPC Licence and it would be up to Dublin Aerospace to provide details of remediation plans if there is some impact on Eirtech site from historical contamination.

- List all chlorinated solvents used on site provide total annual usage volumes

No chlorinated solvents were used and are currently expected to be used as part of the paint spraying process by Eirtech Aviation Ltd in Dublin site.

However there may be a customer requirement to use chlorinated solvents (methylene chloride). As results of this we would like to request that Class B compounds be included in our IPPC Licence.

- Provide details of any lead based paints in use;
There are no lead based paints in use in Eirtech Aviation Ltd operation.
- Provide details of solvent/paints/other materials used in the etching process;

There are two types of etching process carry out on site:

1) Type 1 (paint based process):

- Celerol – wash primer
- Celerol – hardener
- Celerol – thinner

2) Type 2 (chemical based process):

- Metal Glo 6
- Alocrom Part A & B

Safety data sheets for materials used in the etching process attached to the letter (See Attachment No. 4)

- Describe how pumps, lances, hoses and spray guns are cleaned with particular reference to waste arising;

Lances are cleaned by using water. Waste wash water use in cleaning process is store in 200liter drums and then collected by licence hazardous waste contractor (ENVA).

The pumps, hoses and spray guns are cleaned by running a solvent through them. Waste solvent used during cleaning process is store in 200liter drums and then collected by licence hazardous waste contractor (Soltec). Recycled solvent is used by Eirtech for the cleaning equipment again.

Amount of hazardous waste produced on site is present in Table "Waste Produced in 2010- Eirtech Aviation Ltd Dublin" in Attachment No.1

- An estimate that 10-20% of paint emissions would be emitted as fugitive emission has been provided in your application. Provide workings of this estimate.

The 10-20% figure is based on the likely figures which would be emitted as fugitive emission under the Shannon facility systems. The 10-20% is based on the painting experience at the Shannon facility, where during a typical painting operation in the hangar the ventilation is switched on during application and for the first two hours of the drying period. Therefore the emission from the painting process is emitted trough the exhaust stack during the period of maximum emission. The ventilation is switched off during the further 8-10 hours the aircraft is allowed to dry.

At the Dublin facility the ventilation is turned on most of the time because of the various processes which are carried out in the hangar. It should be noted here that there may be several different aircraft being worked on within the hangar at any one time. It is difficult to provide a general percentage of fugitive emission. This is primarily because there can be a variety of works being carried out on the different aircraft. This depends on the requirements of the owner (fully painted, partly or only small correction), the size of the aircraft and the type of materials used for the project and their specification. The 10-20% it is likely to be less for the Dublin facility because of the longer time period with ventilation switch on.

Eirtech does employ as part of a BAT approach the following general housekeeping measures to reduce other fugitive/ incidental emissions:

- Close containers after use
- Use of lidded bins for wipe cloths

- Only mix the correct amount of paint and mix immediately prior to use
 - Enclosed gun cleaning where ever practical
 - Drum striper waste as soon as reasonably practical after stripping has taken place.
- Air Dispersion model:
Confirm that background concentrations have been included in the PECs provided, Compare the predicted GLCS PF Class B compounds with relevant short term EALs (for the compounds rarely used) and confirm no impact. Long term EALs should also be used for any Class B compounds used on regular basis. Submit graph of contour plots (isopleths) for (1) short term PECs (PM 2.5) and (2) long term PECs (PM2.5) and (3) short term PECs (TOC (as C) (based on previous inspectors report for the site)

Amendments to previous version of Air Quality Impact were made by URS Ireland at 18 February 2010. New version of the report with requested information was attached to the letter. (See Attachment No.5)

- The Hazardous Waste Store included in your site boundary map 1 entitled 'IPPC Licence Application Site Plan' is already within the site boundary for Dublin Aerospace Ltd., IPPC Licence Reg. No. P0480-02. Provide details of lease agreement for this store and for Hangar 3. Provide details of the storage locations of hazardous materials and hazardous waste. Submit revised site boundary map as necessary;

The building (Hazardous Storage Area – Map 1, IPPC Licence Application, Site Map) which was use by Eirtech as a store for the hazardous materials and hazardous waste is currently a part of the Dublin Aerospace Ltd, IPPC Licence Reg. No. P0480-02.

The Eirtech new storage area for hazardous materials (SA2) and hazardous waste (SA1) is marked on the Site Plan (See attachment No. 6).

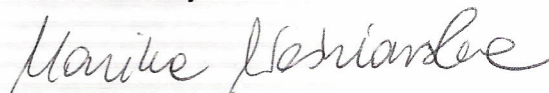
The details regarding the lease agreement between Dublin Airport Authority and Eirtech are attached in Attachment No 6. This agreement is a confidential document and must not be put on public record.

- As previously requested on 11th November 2010, provide the results of each step of the Stage 1 Screening as detailed below:

Refer to correspondence with EPA Inspector Loretta Joyce from the 02 March 2011; there is no need to provide any further information for that question. It has been already clarified in Article 11 response dated 22nd November 2010.

If you required any further information on this matter please feel free to contact me.

Yours sincerely



Monika Wasniowska

Environment Manger, Eirtech Aviation

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