



Annual Environmental Report (AER) 2023

Company Name: International Aerospace Coatings Limited

Licence Number: P0497-03

Address: Shannon Airport, Shannon, Co. Clare

Class of Activity¹:12.2.2 Surface Coatings

¹ See Appendix I

Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities² of large scale industrial (e.g. chemical, food processors, power plants) and waste facilities. Submitting an Annual Environmental Report (AER) is a requirement of all EPA licences.

An AER is a public document. To this end, this format has been developed for industrial and waste licence holders (other than the intensive agriculture sector) to use as a template. This is to assist any member of the public to interpret and understand the environmental performance of the licensed facility.

The AER is a **summary** of environmental information for a given year. It includes:

- Details of the licence holder's environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility's activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

² See Appendix I

- 2) Some documents³ are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

³ This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

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Glossary

| | |
|-------------------------|---|
| Abatement Equipment | Technology used to reduce pollution |
| AER | Annual Environmental Report. |
| Beyond Compliance | Beyond compliance is concept to help deliver greater organisational performance and long-term value for the environment, society and the economy. |
| CRAMP | Closure, Restoration and Aftercare Management Plan. |
| ELRA | Environmental Liability Risk Assessment. |
| Emission Limit Value | Limits set for specified emissions, typically outlined in Schedule B of an EPA licence. |
| EMS | Environmental Management System. |
| Environmental Goal | An objective or target set by a licensee as part of an environmental management system (EMS). |
| Environmental Pollutant | Substance or material that due to its quantity and/or nature has a negative impact on the environment. |
| Facility | Any site or premises that holds an EPA industrial or waste licence. |
| FP | Financial Provision. |
| GJ | Giga joules, an international unit of energy measurement. |

| | |
|--------------------------|--|
| Groundwater | All water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil. |
| Incident | As defined by an EPA industrial or waste licence. |
| Inert Waste | Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health. |
| List of Wastes (LoW) | A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU. |
| Noise Sensitive Location | Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels. |
| Non-Renewable Resource | A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas. |
| Oil Separator | Separator system for light liquids (e.g. oil and petrol). |
| PRTR | Pollutant Release and Transfer Register. |
| Renewable Resource | Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases. |
| Sanitary Waste | Waste water from toilet, washroom and canteen facilities. |

| | |
|----------------------------|--|
| Storm Water | Rain water run-off from roof and non-process areas. |
| Surface Water | Lakes, rivers, streams, estuaries and coastal waters. |
| Trigger Level | A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder. |
| Volatile Organic Compounds | Gases produced from solids or liquids that evaporate readily in ambient conditions. |
| Waste | Any substance or object which the holder discards or intends or is required to discard. |

Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

Declaration

I, Niamh Mc Mahon (Environmental Consultant), confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

Tick here

1) Introduction

See below a brief description of our facility and a summary of our environmental performance this year.

International Aerospace Coatings (IAC) is a world leading specialist aircraft finishing company which has its European headquarters in Shannon, Co. Clare. The Shannon site consists of two environmentally controlled hangars providing the capacity to paint up to 2 Boeing 767 aircraft at a time. There have been no significant changes to the Shannon operations in 2023.

Contact Us

If you have any questions or would like further information on any aspect of our licensed activity, please contact us directly.

See below details:

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2) How we Manage our Facility

Environmental Management System

Explanation

To ensure our facility's activities do not cause environmental pollution we are required to have detailed documentation systems in place to help us manage and track our environmental performance. These systems are referred to as Environmental Management Systems (EMS). We review our EMS every year and set up-to-date **environmental goals** to continually improve our environmental performance.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

Table 1 Environmental Goals

| Environmental Goal | Target Date | Progress |
|--|--------------------|-----------------|
| Ensure all staff receive environmental training and improve environmental awareness among staff members. | Continual | Ongoing |
| Identify opportunities for increasing waste recycling and monitor waste streams | Continual | Ongoing |
| Reduce the generation of waste from AHU filter changes and disposal. | Continual | Ongoing |
| Submit to authorities required data for materials utilised that have REACH requirements. Monitor and | Continual | Ongoing |

| | | |
|--|-----------|---------|
| Mitigate use of REACH products where feasible. | | |
| Gather Energy usage data and target continuous energy reduction throughout the facilities where possible, considering feasibility. | Continual | Ongoing |

Comment

| |
|----------------|
| Not Applicable |
|----------------|

Beyond Compliance

Explanation

We are legally required to comply with our environmental licence. However, the EPA realise that some sites go further than just complying with their environmental licence requirements. Some projects carried out at facilities can have long term positive impacts on the environment and local communities.

The EPA's beyond compliance initiative is encouraging us to identify and report on these environmental and sustainability projects. For example, the project could involve renewable energy, biodiversity, water conservation or exemplar community engagement.

Did any project completed on your site in the reporting year go beyond your licence requirements?

Yes

No

If yes, provide details of one case study in Appendix III that demonstrates how the project went beyond compliance of your licence.

3) Energy & Water

Energy

Explanation

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

Table 3 Energy Used

| Energy Used | Quantity (GJ) | % Increase/ decrease on previous year |
|------------------------------------|----------------------|--|
| Electricity | 11192 | -5% |
| Heavy Fuel Oil | | |
| Light Fuel Oil | | |
| Natural Gas | 40162 | +13% |
| Coal / Solid Fuel | | |
| Peat | | |
| Renewable Biomass | | |
| Renewable Energy Generated On-site | | |
| Total Energy Used | 51353 | + 8% |

Comment

Not Applicable

The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

Table 4 Energy Generated

| Energy Generated | Quantity (GJ) | % Increase/ decrease on previous year |
|-------------------------------|----------------------|--|
| Renewable Energy | - | - |
| Total Energy Generated | - | - |

Comment

Not Applicable

Water

Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

Table 5 Water Used

| Source of Water Used | Quantity (m³/year) | % Increase/ decrease on previous year |
|-----------------------------|--------------------------------------|--|
| Groundwater | - | - |
| Surface Water | - | - |
| Public Supply | 1314 | - |
| Recycled Water | - | - |
| Rainwater | - | - |
| Total Water Used | 1314 | - |

Comment

2022 figures included as the 2023 are not yet available from the airport authority. The AER will be updated with the revised water figures upon receipt.

4) Environmental Complaints

Explanation

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us⁴ directly. You can also contact the EPA⁵ if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

Table 6 Summary of All Environmental Complaints Received in

| Type of Complaint | Number of Complaints | Number Closed |
|---------------------------|-----------------------------|----------------------|
| Odour / Smells | - | - |
| Noise | - | - |
| Dust | - | - |
| Water Quality | - | - |
| Air Quality | - | - |
| Waste | - | - |
| Litter | - | - |
| Vermin/Flies/Birds | - | - |
| Soil Contamination | - | - |
| Vibration | - | - |
| Other | - | - |

⁴ See Section 1, Introduction – Contact Us

⁵ If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

Comment

There were no complaints received in 2023.

5) Environmental Incidents

Explanation

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.

Table 7 Number of Environmental Incidents

| Incident Category | Minor | Limited | Serious | Very Serious | Catastrophic |
|------------------------------|--------------|----------------|----------------|---------------------|---------------------|
| Abatement Equipment Offline | - | - | - | - | - |
| Breach of Ambient ELV | - | - | - | - | - |
| Breach of Emission Limit | - | - | - | - | - |
| Explosion | - | - | - | - | - |
| Fire | - | - | - | - | - |
| Monitoring Equipment Failure | - | - | - | - | - |
| Odour | - | - | - | - | - |
| Spillage | - | - | - | - | - |
| Breach of trigger Level | - | - | - | - | - |
| Uncontrolled Release | - | - | - | - | - |

| Incident Category | Minor | Limited | Serious | Very Serious | Catastrophic |
|--------------------------|--------------|----------------|----------------|---------------------|---------------------|
| Other | - | - | - | - | - |

Comment

There were no reported incidents in 2023.

6) Our Environmental Emissions

Explanation

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Waste water
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA⁶.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

⁶ See section 5, Incidents

Storm Water

Explanation

Storm water is rain water run-off from roof and non-process areas of a facility, e.g. carparks, and generally shall not contain any pollution. Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

1. Storm water from our facility is managed prior to release by;

Not applicable

2. Storm water from our facility is released into the following water bodies:

Shannon Industrial Estate culvert

Table 8 Summary of Storm Water Monitoring

| Parameter measured | No. of Samples | % Compliant⁷ | Comment |
|---------------------------|-----------------------|--------------------------------|--|
| pH | 24 | 100% | |
| COD | 24 | 83% | COD exceedances were not related to site activities. |
| Metals | 24 | 100% | |
| Visual | Daily | 100% | |

Add rows as necessary

Comment

Storm waters are released via 2 emission points from the site; SW-1 & SW-2. Each of the emission points are inspected visually on a daily basis, with pH, COD and approved metals- Chromium, Hexavalent Chromium & Zinc being completed on a monthly basis. Trigger limits are specified for the parameters of pH & COD only.

⁷ % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.

Waste Water

Explanation

There are two types of waste water that can be produced:

- Process waste water produced from the activities and;
- Sanitary waste water from toilets, washrooms and canteens.

Our EPA licence requires us to manage our waste water on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the waste water produced from our activities, where it is released and the results of monitoring this year.

1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody;

Sanitary wastewater is connected to foul sewer and treated at Shannon wastewater treatment plant. Wastewater produced from aircraft washing in H6 and H7 is captured in internal drains and stored in underground concrete bunds. Bunds are integrity tested as required by the licence and emptied by ENVA Environmental Licenced waste contractors as required.

2. Treated waste water from our facility is released into the following water bodies:

There are no process wastewater emission points from the site.

Table 9 Summary of Waste Water Monitoring

| Parameter measured | No. of Samples | % Compliant | Comment |
|---------------------------|-----------------------|--------------------|----------------|
| - | - | - | - |
| - | - | - | - |

Add rows as necessary

Comment

| |
|----------------|
| Not applicable |
|----------------|

Air

Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

1. We monitor air emissions from the following number of emission points at our facility.

Hangar 6: A2-1, A2-2

Hangar 7: A2-3, A2-4, A2-5, A2-6 A2-7, A2-8

Table 10 Summary of Air Emissions Monitoring

| Parameter measured | No. of Samples | % Compliant | Comment |
|---|----------------|-------------|---------|
| Flow | 32 | 100% | |
| TOC | 192 | 100% | |
| VOC's – H341/H351 | 32 | 100% | |
| VOC's- H340, H350, H350i H360D or H360F | 32 | 100% | |
| Particulates | 32 | 100% | |

| | | | |
|----------|----|--------|---|
| Chromium | 18 | 83.33% | Results are not accredited for Chromium VI. |
|----------|----|--------|---|

Add rows as necessary

Comment

| |
|----------------|
| Not applicable |
|----------------|

Table 11 Summary of Odour Assessments Carried Out

| Assessment Conducted By | No. of Odour Assessments | % Compliant⁸ | Comment |
|--------------------------------|---------------------------------|--------------------------------|----------------|
| Licence Holder | - | - | - |
| EPA | - | - | - |

Add rows where necessary

Comment

Not applicable

⁸ A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at [Air Enforcement | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/enforcement/)

Fugitive Solvent Emissions

Are you required to monitor fugitive solvent air emissions from your facility?

Yes

No

Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations⁹. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

Table 12 Summary of Fugitive Solvent Emissions

| Quantity of Solvents Used (Kg) | % Fugitive Solvent Emissions | Compliant |
|--------------------------------|------------------------------|-----------|
| 36,037 | 7.6 | Yes |

Comment

The site has a fugitive emission value of 20%. The fugitive emissions reported relate to the 2022 solvent management plan. Work is still ongoing on the solvent management plan for 2023. This will be filed through EDEN when available.

⁹ See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

Groundwater

Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

1. Do you have a groundwater monitoring programme in place?

Yes

No

2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?

Yes

No

Table 13 List of Groundwater Pollutants Identified

| Pollutants |
|------------|
| |

Add rows as necessary

3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.

Not applicable

Comment

Groundwaters are monitored at 4 wells on-site, namely BH-101, BH-102, BH-103, BH-104 & BH-105. Monitoring is undertaken for pH, COD, Ammonia and the following EPA approved metals- Chromium, Hexavalent Chromium & Zinc.

Noise

Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

1. We conducted noise monitoring on the following dates this year:

Not applicable

2. Where was the noise monitoring carried out?

- i. the boundary of our facility;
- ii. noise sensitive locations off-site; or
- iii. both.

Not applicable

3. Were measured noise levels compliant with your EPA licence limits?

Yes

No

If No, we took the following actions to address the noise level exceedances?

Not applicable

Comment

Not applicable

7) Waste

Waste Generated

Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in Table 14 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

Table 14 Waste Generated

| Type | Quantity (Tonnes) | % Increase/ decrease on previous year | % Recovery |
|---------------------|-------------------|---------------------------------------|------------|
| Hazardous | 370.3 | +39% | 41% |
| Non-Hazardous | 168.7 | +8% | 79% |
| Inert | | | |
| Total Tonnes | 539 | +28% | 53% |

Comment

Larger aircraft being painted at the Shannon site have resulted in larger volumes of hazardous waste.

Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes

No

Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 15 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

Table 15 Waste Accepted

| Type | Quantity (Tonnes) | % Increase/ decrease on previous year | % Recovery |
|---------------------|-------------------|---------------------------------------|------------|
| Hazardous | - | - | - |
| Non-Hazardous | - | - | - |
| Inert | - | - | - |
| Total Tonnes | - | - | - |

Comment

Not applicable

8) Financial Provision

Explanation

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high risk facility¹⁰ by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes

No

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

Submitted March 2023. Reviewed and closed by the EPA.

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

Submitted March 2023. Reviewed and closed by the EPA.

4. Has there been any significant changes on your site since the last agreements?

Yes

No

If yes, have you submitted details to the EPA?

Yes

No

N/A

¹⁰ See Appendix II

Appendix I

Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

| | |
|----------|-------------------------------------|
| Class 1 | Minerals and other materials |
| Class 2 | Energy |
| Class 3 | Metals |
| Class 4 | Mineral fibres and glass |
| Class 5 | Chemicals |
| Class 6 | Intensive Agriculture ¹¹ |
| Class 7 | Food and drink |
| Class 8 | Wood, paper, textiles and leather |
| Class 9 | Fossil fuels |
| Class 10 | Cement, lime and magnesium oxide |
| Class 11 | Waste |
| Class 12 | Surface Coatings |
| Class 13 | Other Activities |

¹¹ This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at [Compliance & Enforcement: Licensees: Reporting Publications | Environmental Protection Agency \(epa.ie\)](#)

Appendix II

High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

NOTE:

This list is subject to change.

See the link below for further information.

[Compliance & Enforcement: Financial Provisions Publications | Environmental Protection Agency \(epa.ie\)](#)

Appendix III

Beyond Compliance

The case study below shows how we went beyond the requirements of our licence in the reporting year.

- Transition to LED lighting in work areas;
- External energy auditors engaged, and
- Transition to electric MEWPs from combustion models.