

S99E Reply

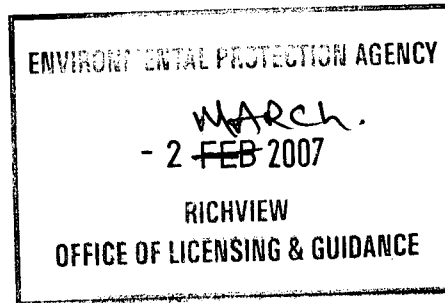


P0014-04

**Fingal County Council Comhairle Contae Fhine Gall**

Ms. Emer Cooney,  
Licensing Unit,  
Environmental Protection Agency,  
Richview,  
Clonskeagh,  
Dublin 14.

28 February 2007



Water Services Department  
Postal Address  
P.O. Box 174,  
County Hall,  
Swords,  
Fingal,  
Co. Dublin

An Roinn Seirbhísí Uisce  
Bosca 174,  
Áras an Chontae,  
Sord,  
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Contae Átha Cliath

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01 890 5970  
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waterservices@fingalcoco.ie  
www.fingalcoco.ie

**Re: Consent to discharge - Swords Laboratories, Watery Lane.**

Dear Madame,

Please find enclosed the completed consent to discharge form for Swords Laboratories, Watery Lane, Swords, Co. Dublin.

If you have any queries regarding this matter do not hesitate to contact David Devine on 8906776 or by email at: [david.devine@fingalcoco.ie](mailto:david.devine@fingalcoco.ie).

Yours Faithfully,

David Devine  
A/Senior Executive Engineer  
Water Pollution Control

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*Water is precious. Let's conserve it.  
Tá uisce luachmhar. Caomhnaímís é.*



**SANITARY AUTHORITY RESPONSE**

Name of Sanitary Authority : Fingal County Council

Address : P.O. Box 174  
Fingal County Hall  
Swords  
County Dublin

Name of Facility : Swords Laboratories.  
Watery Lane,  
Swords.  
County Dublin.

IPPC Register Number: P0014-04 Emission Point Reference 18276, 47339

|   |     |
|---|-----|
| Consent review granted subject to the consent conditions outlined below | Yes |
|---|-----|

**CENTRAL LABORATORY CONSENT CONDITIONS**

| GENERAL CONSENT CONDITIONS  | Condition to be included (Yes/No) |
|---|-----------------------------------|
| 1. No specified emission to sewer shall exceed the emission limit value or load set out in Schedule B : <i>Emission Limits to Sewer</i> .<br>There shall be no other emission to sewer of environmental significance.   | Yes                               |
| 2. The Licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out in <i>Schedule C</i> .   | Yes                               |
| 3. Monitoring and analyses equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge.  | Yes                               |
| 4. The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus installed in connection with the trade effluent and to take samples of the process effluent.  | Yes                               |
| 5. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activities are being carried out unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternate sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency. | Yes                               |
| 6. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.  | Yes                               |
| 7. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and off-site points as required by the Agency.  | Yes                               |
| 8. No substance shall be present in such concentrations as would constitute a danger to sewer maintenance personnel working in the sewerage system or would be injurious to the construction of the sewer or would interfere with the operations of a downstream wastewater treatment works.  | Yes                               |

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|---|-----|
| 9. No substance shall be discharged in a manner, or at a concentration which after initial dilution in the receiving waters to which the Sanitary Authority sewage is discharged, causes tainting of fish or shellfish.   | Yes |
| 10. No emission to sewer shall take place which gives rise to any reaction within the sewer or to the liberation of by-products which may be of environmental significance.   | Yes |
| 11. The licensee shall ensure that the effluent shall not contain petroleum hydrocarbons or organic solvents (including chlorinated organic solvents) which would give rise to flammable or explosive vapours in the sewer.   | Yes |
| 12. A summary report of the results of analysis of effluent discharged to the sewer with relevant volumes discharged shall be forwarded to the sanitary authority on a quarterly basis.   | Yes |
| 13. Non-trade effluent wastewater ( e.g. firewater, accidental spillages ) which occurs on site shall not be discharged to the sewer without the prior authorisation of Fingal County Council.  | Yes |
| 14. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid, alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer. | Yes |

#### ADDITIONAL GENERAL CONSENT CONDITIONS

|   |
|---|
| 15. A log detailing the usage of all cooling water and boiler water treatment chemicals shall be kept by the Licensee and submitted to Fingal County Council on an annual basis.  |
| 16. Best available technology ( BAT ) for the relevant activity ( Manufacture of Pharmaceutical products and their intermediates ) shall be used to prevent, minimise, manage and treat pollutants in the wastewater stream discharging to foul sewer under this consent. |
| 17. The Licensee shall maintain, or have maintained the on-site effluent treatment systems.   |
| 18. The Licensee shall provide Fingal County Council with flow data for effluent discharged to sewer that is sampled under Fingal County Council's monitoring and charging programmes.  |
| 19. The Licensee shall provide Fingal County Council with COD and SS concentration data for any effluent discharged to sewer as required under Fingal County Council's monitoring and charging programmes.  |
| 20. Representative samples of the treated trade effluent shall be subjected to aquatic toxicity testing using an appropriate test organism.   |

# Limit Values for Trade Effluent to Sewer

## Schedule B - Emissions to Sewer

Emission point reference no: N/A

Emission to (sewer description): Foul Sewer on Watery Lane

Grid Reference : 18276, 47339

Volume to be emitted: Maximum in any one day : 600.0 m<sup>3</sup>  
 Maximum rate per hour : 60.0 m<sup>3</sup>

| Parameter                       | Emission      | Limit Value          |                  | Parameter to be limited (Yes/No) |
|---------------------------------|---------------|----------------------|------------------|----------------------------------|
|                                 | Grab          | Daily Mean           | Daily Mean       |                                  |
|                                 | Sample (mg/l) | Concentration (mg/l) | Loading (kg/day) |                                  |
| BOD                             | 250           | 200                  | 120.0            | Yes                              |
| COD                             | 2000          | 1500                 | 900.0            | Yes                              |
| Suspended Solids                | 500           | 400                  | 240.0            | Yes                              |
| Sulphates (as SO <sub>4</sub> ) | 750           | 750                  | 450.0            | Yes                              |
| Fats, Oils, Grease              | 100           | 100                  | 60.0             | Yes                              |
| pH                              | 6 - 10        | 6 - 10               | -                | Yes                              |
| Temperature                     | 42 degrees C  | 42 degrees C         |                  | Yes                              |

## ADDITIONAL PARAMETERS

|                                      |     |     |      |     |
|--------------------------------------|-----|-----|------|-----|
| Phosphates ( as PO <sub>4</sub> -P ) | 150 | 100 | 60.0 | Yes |
| Zinc ( as Zn )                       | 2.0 | 1   | 0.6  | Yes |
| Chromium ( as Cr )                   | 1.0 | 0.5 | 0.3  | Yes |
| Copper ( as Cu )                     | 1.0 | 0.5 | 0.3  | Yes |
| Lead ( as Pb )                       | 0.2 | 0.1 | 0.1  | Yes |
| Nickel ( as Ni )                     | 1.0 | 0.5 | 0.3  | Yes |
|                                      |     |     |      |     |
|                                      |     |     |      |     |



# Frequency of Monitoring Trade Effluent to Sewer

## Schedule C - Monitoring of Emissions to Sewer

Emission point reference no: 18276, 47339

| Parameter                       | Monitoring Frequency | Sampling Method/Type<br>(grab, continuous) |
|---------------------------------|----------------------|--|
| Flow to sewer                   | Continuous           | Continuous                                 |
| BOD                             | Monthly              | 24-hr composite sample                     |
| COD                             | Monthly              | 24-hr composite sample                     |
| Suspended Solids                | Monthly              | 24-hr composite sample                     |
| Sulphates (as SO <sub>4</sub> ) | Monthly              | 24-hr composite sample                     |
| Fats, Oils, Grease              | Monthly              | 24-hr composite sample                     |
| pH                              | Continuous           | Continuous                                 |
| Temperature                     | Continuous           | Continuous                                 |

## ADDITIONAL PARAMETERS

(if required)

|                                      |           |                        |
|--------------------------------------|-----------|------------------------|
| Phosphates ( as PO <sub>4</sub> -P ) | Monthly   | 24-hr composite sample |
| Zinc                                 | Monthly   | 24-hr composite sample |
| Chromium                             | Monthly   | 24-hr composite sample |
| Copper                               | Monthly   | 24-hr composite sample |
| Lead                                 | Monthly   | 24-hr composite sample |
| Nickel                               | Monthly   | 24-hr composite sample |
| Fluoride ( as F- )                   | Monthly   | 24-hr composite sample |
| Organic Compounds*                   | Monthly   | 24-hr composite sample |
| Toxicity ( Freshwater Aquatic )      | Quarterly | Grab Sample            |
| Toxicity ( ISO 8196 )                | Quarterly | Grab Sample            |
| Activated Sludge                     |           |                        |
|                                      |           |                        |
|                                      |           |                        |

\* Screening for Priority Pollutant List Substances. This analysis shall include those organic solvents in use in the processes, which are likely through normal process operations, to be discharged to the wastewater stream being discharged to sewer, and particularly including the Dangerous Substances- Toluene, Dichloromethane and Xylenes.

| SANITARY AUTHORITY CHARGES               |               |
|--|---------------|
| Charge per cubic metre of trade effluent |               |
| Payment Frequency                        |               |
| Annual Monitoring Costs                  | Euro 1524.00. |

Signed on behalf of Central Laboratory:

*Imelda Averill*

**Imelda Averill,**  
**Senior Executive Scientific Officer.**  
28/02/07

*Denis Morrissey*

**Denis Morrissey,**  
**Senior Scientific Officer.**  
28/02/07

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