



Fingal County Council Comhairle Contae Fhine Gall

Environmental Protection Agency

11 JUL 2007

Emissions Trading Unit Richview

Ms. Liz Leacy,
Office of Climate Change,
Licencing & Resource Use,
Environmental Protection Agency,
McCumiskey House,
Richview,
Clonskeagh Road,
Dublin 14.

09/07/2007

Re: Fingal County Council response to Kepak Clonee, Objection to Proposed Determination.

Dear Madam,

Fingal County Council has reviewed the Objections made by Kepak Clonee regarding the Proposed Determination issued by the EPA on 24th May 2007. Several of the objections relate to conditions regulating Firewater / Air Emissions / Storage Tanks / Plant Decommissioning / which were not drafted by Fingal County Council.

Consent conditions relating to the trade effluent discharge to sewer which were objected to were:

- 3.8.1 This was drafted by the EPA.
- 3.9 This was drafted by the EPA.
- 4.3.3 This was drafted by the EPA.
- 10. This was drafted by the EPA.

Schedule B - Emission Limits to Sewer

- B.3 Emission limits set in B.3 were qualified in Schedule C of Fingal County Council's consent as reported to the EPA on 15/03/2007.
(See attached Consent to Discharge)

Phosphorus and Nitrogen

Phosphorus is regulated by the Local Government (Water Pollution) Act, 1977 (Water Quality Standards for Phosphorus) Regulations, 1998. These Regulations require that P is regulated in Trade Effluent Licences and Consents.

Total N and Total P are regulated under Urban Wastewater Regulations, 1994 to 2001. The Ringsend Wastewater Treatment Plant discharges to the Liffey Estuary which is designated as "Sensitive to Eutrophication". Regulation of Total N and Total P in Industrial Wastewaters is required by the 4th Schedule of these Regulations. Monitoring for these parameters has been included in this consent to gather baseline data.

Sulphates

Sulphates were included in the Licence on further consideration of the consent conditions.

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County Hall,
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Co. Dublin

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Emission Limit Values dating from May, 2010

Discharge from the Kepak, Clonee plant is treated at the Ringsend Wastewater Treatment Plant. This plant is currently operating at full capacity; a programme has been initiated to reduce volumes and concentrations of effluent entering this facility.

Fingal County Council felt the immediate introduction of significantly reduced limits (i.e. those active from May 2010) would have led to continuous monthly exceedence by Kepak of these proposed values. Therefore it was decided to phase the introduction of the proposed values outlined in the IPPC consent in two stages.

It is hoped that a 3 year advance notification of the new limits will allow Kepak sufficient time to implement the changes that may be required to achieve the reduced limit values set out in the IPPC Consent.

C.3.1 This was drafted by the EPA.

If you require any further information, please contact Mr. David Devine, A/Senior Executive Engineer on 01 8906776 or by email at david.devine@fingalcoco.ie.

Yours Faithfully,

David Devine
A/Senior Executive Engineer

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Fingal County Council Comhairle Contae Fhine Gall



Ms. Noeleen Roche,
Office of Licencing & Guidance,
EPA Headquarters,
PO. Box 3000,
Johnstown Castle Estate,
Co. Wexford.

15/03/2007

Re: IPPC consent – Reg. No. P0167-02 Kepak Clonee, Clonee, Co. Meath.

Dear Madam,

Please find attached, the report from Fingal County Council granting consent to Kepak Clonee, Co. Meath to discharge to the Fingal County Council sewer. This consent to discharge is subject to the conditions outlined in the attached report.

Chemical and Monitoring conditions are attached for this IPPC consent based on a daily effluent volume of 1,300 cubic metres.

Fingal County Council requests the elimination of all grab limits from Schedule 2(i) Emissions to sewer, as a 24hr composite sample is required under the conditions of this consent to discharge.

If you require any further information regarding this matter please do not hesitate to contact me on 01 8906776 or by email at david.devine@fingalcoco.ie.

Yours Faithfully,

David Devine
A/Senior Executive Engineer,
Water Pollution Control Section

Water Services Department
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SANITARY AUTHORITY RESPONSE

Name of Sanitary Authority : Fingal County Council

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

*Name of Facility : Kepak, Clonee.
Address : Clonee, County Meath.*

IPPC Register Number: P0167-02 (previously IPC 167)

Consent review granted subject to the consent conditions outlined below	Yes
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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> . 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

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 activities (7.4.2 Food and Drink – the slaughter of animals where the daily capacity exceeds 1,500 units) 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.

Limit Values for Trade Effluent to Sewer

Schedule B - Emissions to Sewer

Emission point reference no: **CE-1**

Emission to (sewer description): **Foul Sewer MH K8, Outside Kepak Site.**

Grid Reference : **N/A**

Volume to be emitted: Maximum in any one day : 1300.0 m^3
 _____ Maximum rate per hour : 100 m^3

Parameter	Emission Limit Value		Parameter to be limited (Yes/No)
	Daily Mean	Daily Mean	
	Concentration (mg/l)	Loading (kg/day)	
BOD	2,000	2600.0 (43,333 PE)	Yes
COD	4,000	5200.0	Yes
Suspended Solids	1,500	1950.0	Yes
Sulphates (as SO_4)	400	520.0	Yes
pH	6 - 10	-	Yes
Temperature	42 degrees C		Yes

ADDITIONAL PARAMETERS

Phosphates (as PO_4 -P)	100	130.0	Yes
Oils, Fats and Greases (mg/l)	100	130.0	Yes
Detergents	100	130.0	Yes

Fingal County Council requires a 25% reduction in the Daily Mean Concentration values for the following parameters: BOD, COD, SS & Sulphates.
 The new Daily Mean Concentration Emission Limit values will be effective from May 2010.

Frequency of Monitoring Trade Effluent to Sewer

Schedule C - Monitoring of Emissions to Sewer

Emission point reference no: N/A

Parameter	Monitoring Frequency	Sampling Method/Type (grab, continuous)
Flow to sewer	Continuous	Continuous
BOD	Fortnightly	24-hr composite sample
COD	Fortnightly	24-hr composite sample
Suspended Solids	Fortnightly	24-hr composite sample
Sulphates (as SO ₄)	Fortnightly	24-hr composite sample
pH	Continuous	Continuous
Temperature	Continuous	Continuous

ADDITIONAL PARAMETERS

Phosphates (as PO ₄ -P)	Fortnightly	24-hr composite sample
Oils Fats and Greases	Fortnightly	24-hr composite sample
Detergents	Fortnightly	24-hr composite sample
Total Phosphorus	Monthly	24-hr composite sample
Total Nitrogen	Monthly	24-hr composite sample

SANITARY AUTHORITY CHARGES

Charge per cubic metre of trade effluent	Euro 1.07 (subject to price variations in the future as they arise.)
Payment Frequency	Quarterly on demand.
Annual Monitoring Costs	Euro 5,330.00