



# TOBIN

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Consulting Engineers

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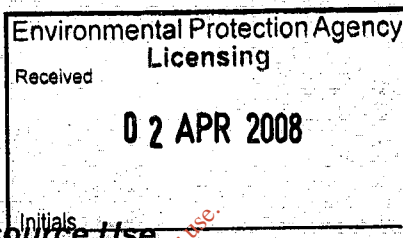
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**Our Ref: 3584 - 02 - 06**

Date: 31/03/08

Environmental Protection Agency,  
Headquarters,  
PO Box 3000,  
Johnstown Castle Estate,  
County Wexford,  
Ireland



Attn of: Office of Climate, Licensing & Resource Use

RE: License Register PO823-01

Dear Sirs,

Further to our observation on the application for an IPPC Licence by Vitra (Ireland) Ltd, IDA Business Park, Ballynattin, Arklow, County Wicklow and our subsequent review of the proposed decision issued by the EPA, dated 6<sup>th</sup> March 2008, on behalf of the IDA, we make the following objections to the proposed decision:

As previously indicated to the EPA in our observation the treatment plant installed at the IDA Arklow Business Park is designed only to treat domestic sewage, i.e. there is organic treatment only and no treatment for heavy metals. This is a point, which has been noted in a report prepared by AWN Consulting Limited for Vitra (Ireland) Ltd.

It should be noted that discharges from the Vitra (Ireland) Ltd. site have caused significant problems for the IDA WWTP in the past and the IDA have been awaiting proposals to resolve the issues with the discharge. This also has been noted in a report prepared by AWN Consulting Limited for Vitra (Ireland) Ltd.

While it is accepted that the EPA have placed limits on the emissions from the Vitra (Ireland) Ltd site, in accordance with PARCOM recommendations, it is still the case that the plant is not designed to treat trade effluents, and as such it is our opinion that the emissions from the Vitra (Ireland) Ltd. site to the IDA WWTP, should be equivalent to domestic sewerage. It is our opinion that failure to do so will continue to present problems for the operation and performance of the WWTP.

Directors: D.A. Downes (Chairman) L.E. Waldron (Managing Director) M.F. Garrick R.F. Tobin J. Collieran B.J. Downes S. Finlay P.J. Fogarty  
D. Grehan J.P. Kelly B.M. Mulligan B. Murray C. O'Keeffe F. Renkema (Dutch) E.J. Harrigan (Company Secretary)

Associates: T. Cannon P. Cloonan D. Conneran M. Conroy T. Curran O. Downes B. Gaffney B. Gallagher B. Heaney  
B. Hutchinson D. Kennedy M. McDonnell C. McGovern E. McPartlin G. Stevenson

Co. Reg. No. 42654 - Registered Office: Fairgreen House, Fairgreen Road, Galway, Ireland.



The IDA is currently in the process of preparing an application for a discharge licence for the discharge from the WWTP on the site, as requested by Wicklow Co.Co. Correspondence dated 30<sup>th</sup> October 2007. It is of particular concern to the IDA that the EPA is proposing to grant permission for emissions from the Vitra site into the IDA WWTP, which the IDA will have no control over.

Should there be any breach of these limits, the IDA will be held responsible, due to the fact that they will be the holder of the discharge license from the site, but they will have no control over the influent quality.

Given these concerns we request the EPA; seek clarification from Wicklow Co. Co., that a discharge license would be granted to the IDA, for the WWTP effluent, with the indicated concentrations, quoted in the proposed decision. Further we request the EPA; seek clarification from Vitra (Ireland) Ltd. on how the discharge quality is to be achieved, and we also request that the EPA revise the limits to levels equivalent to domestic sewage.

Until this is resolved to the satisfaction of the IDA, we feel it necessary to object to the proposed decision.

Yours Sincerely,



David Conneran

Associate

For and on behalf of TOBIN Consulting Engineers

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## Joe Reilly

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**From:** Noeleen Keavey  
**Sent:** 03 April 2008 08:46  
**To:** Joe Reilly  
**Subject:** FW: Licence Register PO823-01  
**Attachments:** S45C-108040213050.pdf

Joe

Another objection for Vitra - check with Ann to see if they paid fee by credit card - if not its invalid !

Noeleen

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**From:** Debbie Farmer [mailto:Debbie.Farmer@tobin.ie]  
**Sent:** 02 April 2008 14:09  
**To:** Noeleen Keavey  
**Subject:** Re: Licence Register PO823-01

Good Afternoon,

Please find attached for your information.

Kind regards,

Debbie Farmer.

**Debbie Farmer** (Accounts Assistant)

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03/04/2008

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