

Licensing Unit
Office of Climate, Licencing & Resource Use
EPA Headquarters
PO Box 3000
Johnstown Castle Estate
County Wexford

For the attention of Caroline Murphy

9th September 2013

Dear Caroline,

**Proposed Waste Licence for the Waterford City Anaerobic Digestion Facility,
Reg No: W0234-2**

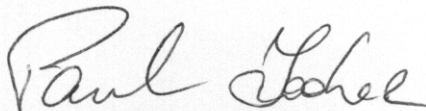
Further to our recent discussions, and the EPA letter dated 26th June 2013, please find our completed Sanitary Authority Response.

To a degree, the proposed operation of this facility will be dependent on some unknowns such as the nature of the material being brought to the plant, the "normal" disposal route of the waste, etc. As such the ELV's proposed may need to be reviewed after a period of plant operation. There was some concern over the levels of Ammonia (as N), for which treatment will probably be required, and its impact downstream in the sewerage system will be reviewed with actual recorded data.

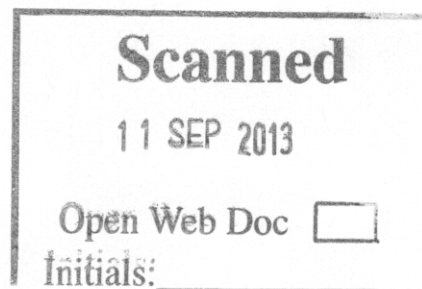
For your records, Christy O'Sullivan has retired, Michael Walsh is the Waterford City Manager, Richie Walsh is the Acting Director of Services for Environmental Services and Planning, and Colin Kehoe has taken over the responsibility for Industrial discharges to sewers.

Should you have any queries, please contact me.

Yours faithfully



Paul Toher
Senior Executive Engineer
Waterford City Council



SANITARY AUTHORITY RESPONSE

re: SECTION 52 OF THE WASTE MANAGEMENT ACTS, 1996 to 2011

Name & Address of Sanitary Authority: Waterford City Council, City Hall, The Mall, Waterford,
Attn: Mr Michael Walsh, Planning, Cluture & Human Resources.

Waste Reg. No. W0234-02

Waste Facility: Waterford City Composting Facility, Green Road,
Kilbarry, Six Cross Roads Business Park, Waterford City

Waste Licence Applicant: Waterford City Council

Consent: Indicate Yes to one of the following statements:

Consent granted subject to the consent conditions outlined below	YES
Consent granted without conditions	
Consent refused ^{Note 1}	

Note 1 Where it is proposed to refuse permission the reasons for the refusal should be clearly outlined in the response.

GENERAL CONSENT CONDITIONS	Condition to be included (Yes/No)
1. No specified emission from the installation shall exceed the emission limit value set out in <i>Schedule B: Emissions 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 out in <i>Schedule C</i> .	YES
3. Monitoring and analytical equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge or emission.	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 process 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 activity is being carried on 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 alternative 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 to off-site points as required by the Agency.	YES
8. 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
9. In the event of any incident which relates to discharges to sewer, having taken place, the licensee shall notify the Agency, Local Authority and Sanitary Authority as soon as practicable after the incident.	YES

ADDITIONAL GENERAL CONSENT CONDITIONS
in respect of discharges or emissions to sewers, in accordance with Section 52
of the Waste Management Acts, 1996 to 2011
(specify, if required)

1. RESULTS OF MONITORING TO BE SUBMITTED TO WATERFORD CITY COUNCIL ON A MONTHLY BASIS IN AN EXCEL FORMAT

2. THE OPERATORS SHALL INFORM WATERFORD CITY COUNCIL IMMEDIATELY OF ANY UNFORESEEN DISCHARGES

3. A CONTINUOUSLY RECORDING FLOW METER SHALL BE INSTALLED AND MAINTAINED ON THE DISCHARGE TO THE PUBLIC SEWER. FLOWS SHALL BE RECORDED AND STORED ON SITE. THE METER SHALL BE CALIBRATED ON AN ANNUAL BASIS.

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Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Waste licence application Register No. W0234-02

Emission Point Reference No: FW 1

Emission to (sewer description): _____

Volume to be emitted: Maximum in any one day: 63 m³

Maximum rate per hour: 2.2 m³

Parameter <i>(delete parameters which are not applicable)</i>	Emission Limit Value	
	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD	20,000	1,260
COD	65,000	4,036
Suspended Solids	500	31.5
PH	6-9	
Temperature	* 30°C	
ADDITIONAL PARAMETERS <i>(if required)</i>		
FOG	80	5
TOTAL NITROGEN	100	6.3
AMMONIA (as N)	250	15.75
MINERAL OILS	20	1.26
SULPHATES	100	6.3
CADMIUM	0.0045	0.0003
CHROMIUM (TOTAL)	0.30	0.019
COPPER	0.60	0.038
LEAD	1.00	0.063
MERCURY	0.003	0.0002
NICKEL	0.15	0.0095
ZINC	1.20	0.0756

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Waste Licence application Register No. W0234-02

Emission Point Reference No: _____

Parameter <i>(delete parameters which are not applicable)</i>	Monitoring Frequency <i>(e.g. monthly, quarterly, annually)</i>	Sampling Type <i>(grab, composite)</i>
Flow to sewer	CONTINUOUS	
Temperature	CONTINUOUS	COMPOSITE
pH	CONTINUOUS	"
BOD	FORTNIGHTLY	"
COD	DAILY WEEKLY	"
Suspended Solids	DAILY WEEKLY	"
ADDITIONAL PARAMETERS <i>(if required)</i>		
FOG	FORTNIGHTLY	COMPOSITE
TOTAL NITROGEN	"	"
AMMONIA (AS N)	"	"
SULPHATES	"	"
MINERAL OILS	QUARTERLY	"
SPECIFIED METALS	"	"

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of process effluent (per s52 of the Waste Management Acts, 1996 to 2011)	
Payment Frequency	
Annual Monitoring Costs	

Signed on behalf of Waterford City Council

Paul Looher

Date 9th September 2013