

Grainne Oglesby

From: Ronan Connolly <rconnolly@water.ie>
Sent: 19 December 2014 15:04
To: Grainne Oglesby
Cc: Martin Carroll; Peter McNulty; LA_johcollins; Gerry O'Donoghue; LA_pohalloran
Subject: P0306-03 Forest Laboratories Ireland Limited - Section 99E - IW Response 141219
Attachments: P0306-03 Forest Laboratories Ireland Limited - Section 99E - IW Response 141219.pdf; P0306-03 Forest Laboratories Ireland Limited - Section 99E Consent 141218.doc

Follow Up Flag: Follow up
Due By: 08 January 2015 11:00
Flag Status: Flagged

Dear Ms Oglesby,

I refer to your letter dated 14th November 2014 regarding an application from Forest Laboratories Ireland Limited, Clonsaugh Industrial Estate, Clonsaugh Business & Technology Park, Coolock, Dublin 17 for an Industrial Emissions Licence review.

Please find attached Irish Water's response in accordance with Section 99E of the Environmental Protection Agency Act 1992, as amended.

A signed hard copy has also been sent to:

Gráinne Oglesby,
Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use,
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford

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Kind Regards,

Ronan

Ronan Connolly
Environmental Policy and Licensing Support Officer

Uisce Éireann
Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, Éire
Irish Water
Colvill House, 24-26 Talbot Street, Dublin 1, Ireland

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Gráinne Oglesby,
Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford

Reg No: P0306-03

18th December 2014

**Environmental Protection
Agency**

22 DEC 2014

Rec by email - 19/12

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Dear Gráinne,

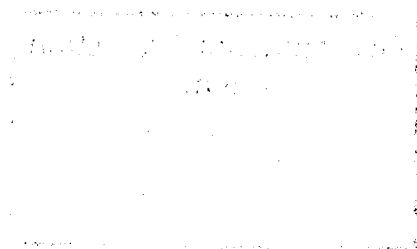
I refer to your letter dated 14th November regarding an application from Forest Laboratories Ireland Limited, Clonsaugh Industrial Estate, Clonsaugh Business & Technology Park, Coolock, Dublin 17 for an Industrial Emissions Licence review.

Please find attached Irish Water's consent to discharge to sewer subject to the consent conditions attached.

If you have any further query please do not hesitate to contact us.

Yours sincerely


Jerry Grant
Head of Asset Management



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IRISH WATER RESPONSE

Name of Facility: Forest Laboratories Ireland Ltd.
Clonsaugh Business and Technology Park,
Coolock,
Dublin 17

IPPC Register Number: P0306-03

Consent is granted to PO 306-03 subject to the consent conditions outlined below	Yes
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GENERAL CONSENT CONDITIONS SE 1, Building 1	Condition to be included (Yes/No)
1. No specified emission to sewer shall exceed the emission limit value or <u>load</u> set out in Schedule B : <i>Emission Limits to Sewer</i> . There shall be no other emission to sewer of environmental significance from Building 1.	Yes
2. The Licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out in Schedule C.	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 Irish Water 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. 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, Dublin City Council and Irish Water as soon as practicable after the incident.	Yes

ADDITIONAL GENERAL CONSENT CONDITIONS	
10.	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 the downstream wastewater treatment works.
11.	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.
12.	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.
13.	A summary report of the results of analysis of effluent discharged to the sewer with relevant volumes discharged shall be forwarded to the Irish Water on a quarterly basis.
14.	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 Irish Water/Dublin City Council.
15.	A log detailing the usage of all cooling water and boiler water treatment chemicals shall be kept by the Licensee and submitted to Irish Water on an annual basis.
16.	Best available technology (BAT) for the relevant Class (12.2.2) 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 pay to Irish Water, such sums as Irish Water determines having regard to the costs incurred in monitoring the licence activity, including inspection, auditing, sampling and analysis as necessary for the performance of its statutory functions. This amount will be revised from time to time. Payment to be made on demand
19.	The licensee shall pay to Irish Water a charge in respect of the reception and treatment of the trade effluent discharged to the foul sewer as may be determined from time to time having regard to the variations in the cost of providing drainage and the variation in effluent reception and treatment costs. Payment to be made on demand.

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Limit Values for Trade Effluent to Sewer

Schedule B - Emissions to Sewer Limits

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

Emission to (sewer description): Sewer in estate Roadway in Clonshaugh Industrial Estate

Volume to be emitted: Maximum in any one day: 150 m³

Parameter	Emission		Parameter to be limited (Yes/No)
	Daily Mean	Daily Mean	
	Concentration (mg/l)	Loading (kg/day)	
BOD	500	75 PE = 1,250	Yes
COD	2,000	300	Yes
Suspended Solids	500	75	Yes
pH	6 - 10	-	Yes
Temperature	42 degrees C		Yes

ADDITIONAL PARAMETERS

Phosphates (as PO ₄ -P)	50	7.5	Yes
Sulphates (as SO ₄)	300	45	Yes
Fats, Oils and Greases	100	15	Yes

Frequency of Monitoring Trade Effluent to Sewer

Schedule C

Emission point reference no: SE-1

Parameter	Monitoring Frequency	Sampling Method/Type (grab, continuous)
Flow to sewer	Continuous	Continuous
BOD	Monthly	24 hour composite sample
COD	Monthly	24 hour composite sample
Suspended Solids	Monthly	24 hour composite sample
pH	Continuous	Continuous
Temperature	Monthly	24 hour composite sample

ADDITIONAL PARAMETERS

(if required)

Phosphates (as PO ₄ -P)	Monthly	24 hour composite Sample
Sulphates (as SO ₄)	Monthly	24 hour composite Sample
Fats, Oils, Grease	Monthly	24 hour composite sample
Total Nitrogen	Monthly	24 hour composite Sample
Total Phosphorus	Monthly	24 hour composite Sample
Volatile Organic Carbons	Annual Screen	24 hour composite Sample
Semi-Volatile Organic Carbons	Annual Screen	24 hour composite Sample

GENERAL CONSENT CONDITIONS SE 2, Building 2	Condition to be included (Yes/No)
<p>1. No specified emission to sewer shall exceed the emission limit value or <u>load</u> set out in Schedule B : <i>Emission Limits to Sewer</i>.</p> <p>There shall be no other emission to sewer of environmental significance from Building 1.</p>	Yes
2. The Licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out in Schedule C.	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 Irish Water 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. 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, Dublin City Council and Irish Water as soon as practicable after the incident.	Yes

ADDITIONAL GENERAL CONSENT CONDITIONS
10. 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 the downstream wastewater treatment works.
11. 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.
12. 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.
13. A summary report of the results of analysis of effluent discharged to the sewer with relevant volumes discharged shall be forwarded to the Irish Water on a quarterly basis.
14. 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 Irish Water/Dublin City Council.

15. A log detailing the usage of all cooling water and boiler water treatment chemicals shall be kept by the Licensee and submitted to Irish Water on an annual basis.
16. Best available technology (BAT) for the relevant Class (12.2.2) 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 pay to Irish Water, such sums as Irish Water determines having regard to the costs incurred in monitoring the licence activity, including inspection, auditing, sampling and analysis as necessary for the performance of its statutory functions. This amount will be revised from time to time. Payment to be made on demand
19. The licensee shall pay to Irish Water a charge in respect of the reception and treatment of the trade effluent discharged to the foul sewer, as may be determined from time to time having regard to the variations in the cost of providing drainage and the variation in effluent reception and treatment costs. Payment to be made on demand.

Limit Values for Trade Effluent to Sewer

Schedule B - Emissions to Sewer Limits

Emission point reference no: **SE-2**

Emission to (sewer description): Sewer in estate Roadway in Clonshaugh Industrial Estate

Volume to be emitted: Maximum in any one day : 85 m³

Parameter	Emission		Parameter to be limited (Yes/No)
	Daily Mean	Daily Mean	
	Concentration (mg/l)	Loading (kg/day)	
BOD	500	42.5 PE = 708	Yes
COD	2,000	170	Yes
Suspended Solids	500	42.5	Yes
pH	6 - 10	-	Yes
Temperature	42 degrees C	-	Yes

ADDITIONAL PARAMETERS

Phosphates (as PO ₄ -P)	50	4.25	Yes
Sulphates (as SO ₄)	300	25.5	Yes
Fats, Oils and Greases	100	8.5	Yes

Frequency of Monitoring Trade Effluent to Sewer

Schedule C

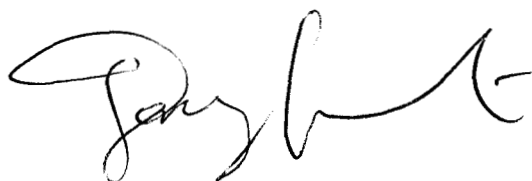
Emission point reference no: SE-2

Parameter	Monitoring Frequency	Sampling Method/Type (grab, continuous)
Flow to sewer	Continuous	Continuous
BOD	Monthly	24 hour composite sample
COD	Monthly	24 hour composite sample
Suspended Solids	Monthly	24 hour composite sample
pH	Continuous	Continuous
Temperature	Monthly	24 hour composite sample

ADDITIONAL PARAMETERS

(if required)

Phosphates (as PO ₄ -P)	Monthly	24 hour composite Sample
Sulphates (as SO ₄)	Monthly	24 hour composite Sample
Fats, Oils, Grease	Monthly	24 hour composite sample
Total Nitrogen	Monthly	24 hour composite Sample
Total Phosphorus	Monthly	24 hour composite Sample
Volatile Organic Carbons	Annual Screen	24 hour composite Sample
Semi-Volatile Organic Carbons	Annual Screen	24 hour composite Sample



18 - 12 - 14

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