

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Peter Pearson,
PP Environmental Consultants Ltd.,
Cahergall,
2 Lakeview,
Faithlegg,
Co. Waterford.
Email: peter@ppenvironmental.ie

4th December 2014

Reference: IPPC Licence P0156-01

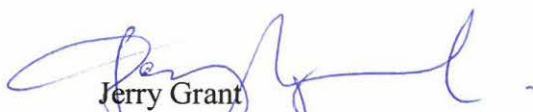
Dear Mr Pearson,

I refer to your proposal to amend conditions set out in IPPC Licence P0156-01 as part of a proposed technical amendment that pertain to Emissions to Sewer.

Irish Water, having reviewed the proposal and following minor amendments agree with the proposed changes as now outlined in the attached document – *Agreed amendments to IPPC Licence with Irish Water – 4th December 2014*

The commencement of any discharge to sewer is subject to EPA licence approval and this is not a consent to alter the current licenced discharge to sewer.

Yours sincerely



Jerry Grant
Head of Asset Management

Technical Amendment Application

Waterford Crystal Ltd (In Receivership)
Springmount,
Dungurvan,
Co. Waterford.

IPPC Licence: P0156-01

Agreed Amendments to IPPC Licence with Irish Water

4th December 2014



For inspection purposes only.
Consent of copyright owner required for any other use.

| Licence Condition No. | Existing Wording | Proposed Changes | Comments |
|-----------------------|---|--|---|
| 3.3 | <p>Emission limit values for emissions to sewer and water in this licence shall be interpreted in the following way:-</p> <p>3.3.1 Continuous monitoring:</p> <p>(i) No flow, pH or temperature value shall exceed the specified limit.</p> <p>3.3.2 Non-Continuous Monitoring:</p> <p>(i) For parameters other than pH, temperature and flow no daily mean concentration or mass emission values on the basis of flow proportional composite sampling shall exceed the emission limit value. No individual result similarly calculated shall exceed the emission limit value.</p> <p>(ii) For parameters other than pH, temperature, and flow, no grab sample value shall exceed the emission limit value.</p> | No change. | <p>Agreed to install the following monitoring equipment:</p> <p>a) 24-hr flow proportional composite sampler</p> <p>b) Flow meter with data logger</p> <p>It is not considered necessary to monitor pH and temperature on a continuous basis.</p> |
| 4.1 | <p>The licensee shall notify the Agency by both telephone and facsimile, if available, to the Agency's Headquarters in Wexford, or to such other Agency office as may be specified by the Agency, as soon as practicable after the occurrence of any of the following:</p> | No change. | |
| 4.1.2 | Any emission which does not comply with the requirements of this licence. | No change. | |
| 4.4 | In the event of any incident, as set out in Condition 4.1.2 above which relates to discharges to sewer, having taken place, the licensee shall notify the Sanitary Authority as soon as practicable, after such an incident. | In the event of any incident, as set out in Condition 4.1.2 above which relates to discharges to sewer, having taken place, the licensee shall notify Irish Water as soon as practicable, after such an incident. | |

| Licence Condition No. | Existing Wording | Proposed Changes | Comments |
|-----------------------|--|---|---|
| 6.1 | No specified emission to sewer shall exceed the emission limit values set out in <i>Schedule 2(i) Emissions to Sewer</i> , subject to Condition 3 of this licence. There shall be no other emissions to sewer of environmental significance. | No change. | Schedule 2(i) Emissions to Sewer has been changed – see proposed new Schedule 2(i) below. |
| 6.2 | The equipment, including backup equipment, specified in <i>Schedule 2(ii) Effluent Treatment Control</i> of this licence, shall be provided on-site. All treatment/abatement, control and monitoring equipment shall be calibrated and maintained at all times when in use, in accordance with the information submitted in Table 14A(iii) of the IPC licence application or as otherwise approved by the Agency under the EMP. | The equipment, including backup equipment, specified in <i>Schedule 2(ii) Effluent Treatment Control</i> of this licence, shall be provided on-site. All treatment/abatement, control and monitoring equipment shall be calibrated and maintained at all times when in use. | Schedule 2(ii) Effluent Treatment Control has been changed – see proposed new Schedule 2(ii) below. |
| 6.3 | Monitoring and analyses of each emission shall be carried out as specified in <i>Schedule 2(iii) Monitoring of Emissions to Sewer</i> of this licence. A report on the results of this monitoring shall be submitted to the Agency monthly. | Monitoring and analyses of each emission shall be carried out as specified in <i>Schedule 2(iii) Monitoring of Emissions to Sewer</i> of this licence. A report on the results of this monitoring shall be submitted to the Agency and Irish Water monthly. | Schedule 2(iii) Monitoring of Emissions to Sewer has been changed – see proposed new Schedule 2(iii) below. |
| 6.4 | A summary report of emissions to sewer shall be submitted to the Agency as part of the AER. The information contained in this report shall be prepared in accordance with any relevant guidelines issued by the Agency. | No change. | - |
| 6.5 | The acute toxicity of the undiluted final effluent to at least four aquatic species from different trophic levels shall be determined by standardised and internationally accepted procedures and carried out by a competent laboratory. The name of the laboratory and the scope of testing to be undertaken shall be submitted, in writing, to the Agency, within three months of the date of grant of this licence. Once the testing laboratory and the scope of testing have been agreed by the Agency, the Agency shall decide when this testing is to be carried out and copies of all reports shall be submitted by the testing laboratory simultaneously to the Agency and the licensee. | - | At the discretion of the Agency |

| Licence Condition No. | Existing Wording | Proposed Changes | Comments |
|-----------------------|--|---|---------------------------------|
| 6.6 | Having identified the most sensitive species outlined in Condition 6.5, subsequent compliance toxicity monitoring on the two most sensitive species shall be carried out by the laboratory identified in Condition 6.5 as per <i>Schedule 2(iii) Monitoring of Emissions to Sewer</i> . The Agency shall decide when this testing is to be carried out and copies of all reports shall be submitted by the testing laboratory simultaneously to the Agency and the licensee. | - | At the discretion of the Agency |
| 6.7 | No substance shall be present in such concentrations as would constitute a danger to personnel working in the sewerage system or would be injurious to the construction of sewer, or interfere with the operations of a downstream wastewater treatment works. | No change. | |
| 6.8 | No substance shall be discharged in a manner or at a concentration which causes tainting of fish or shellfish. | No change. | |
| 6.9 | The licensee shall at all times grant immediate and unhindered access to the factory premises including any treatment plant, monitoring and inspection chambers to authorised personnel of the Agency and the Sanitary Authority, or other authorised agents, or anybody having statutory responsibility for water pollution control to carry out such inspections, and monitoring investigations as deemed necessary, and to take with them such other persons and equipment as considered necessary. | The licensee shall at all times grant immediate and unhindered access to the factory premises including any treatment plant, monitoring and inspection chambers to authorised personnel of the Agency and Irish Water , or other authorised agents, or anybody having statutory responsibility for water pollution control to carry out such inspections, and monitoring investigations as deemed necessary, and to take with them such other persons and equipment as considered necessary. | |
| 6.10 | No emission to sewer shall take place which gives rise to any reaction within the sewer or the liberation of by-products which may cause environmental pollution. | No Change. | |

| Licence Condition No. | Existing Wording | Proposed Changes | Comments |
|-----------------------|--|---|--|
| 6.11 | No emissions to sewer shall contain petroleum spirits or organic solvents which would give rise to flammable or explosive vapours in the sewer. | No Change. | |
| 6.12 | A summary report of the results of analyses of effluent discharged to the sewer shall be forwarded to the Sanitary Authority on an annual basis prior to the end of February of each year. | A summary report of the results of analyses of effluent discharged to the sewer shall be forwarded to Irish Water on a monthly basis. | |
| 6.13 | The licensee shall provide and maintain a monitoring and inspection chamber in an approved location on each pipe through which trade effluent is being discharged. Each such monitoring and inspection chamber shall be constructed and maintained by the licensee so as to permit the taking of samples at the discharge. This monitoring and inspection chamber shall be constructed within two months of the date of grant of this licence. | The licensee shall provide and maintain a monitoring and inspection chamber in an approved location on each pipe through which trade effluent is being discharged. Each such monitoring and inspection chamber shall be constructed and maintained by the licensee so as to permit the taking of samples at the discharge. This monitoring and inspection chamber shall be constructed prior to the discharge of contaminated perched groundwater to sewer. | <p>The monitoring and inspection chamber will be the same as the proposed new sump and safe access to the sump and monitoring equipment will be provided.</p> <p>See attached drawing (Proposed Monitoring Point and Sump Location)</p> |

For inspection purposes only.
Consent of copyright owner required for any other use.

| Licence Condition No. | Existing Wording | Proposed Changes | Comments |
|--------------------------|--|--|----------|
| 10.3 | 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. | All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity (pumping of perched groundwater to sewer) is being carried on unless alternative sampling or monitoring has been agreed in writing by the Agency and Irish Water for a limited period. In the event of a malfunction of any continuous monitor, the licensee shall contact the Agency and Irish Water 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 and Irish Water. | |
| 10.4 | Monitoring and analysis equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge. | No Change. | |
| 10.5 | The frequency, methods and scope of monitoring, sampling and analyses, as set out in this licence, may be amended with the written agreement of the Agency following evaluation of test results. | The frequency, methods and scope of monitoring, sampling and analyses, as set out in this licence, may be amended with the written agreement of the Agency and Irish Water following evaluation of test results. | |

| Licence Condition No. | Existing Wording | Proposed Changes | Comments |
|-----------------------|---|---|--|
| 10.6 | The licensee shall install on all emission points such sampling points or equipment, including any data-logging or other electronic communication equipment, as may be required by the Agency. All such equipment shall be consistent with the safe operation of all sampling and monitoring systems. | The licensee shall install on all emission points such sampling points or equipment, including any data-logging or other electronic communication equipment, as may be required by the Agency and Irish Water. All such equipment shall be consistent with the safe operation of all sampling and monitoring systems. | It is proposed to install a flow meter and data logger on the pumped line from the new sump. |
| 14.2m | <p>Sanitary Authority Charges</p> <p>14.2.1 The licensee shall pay Dungarvan Urban District Council such annual contribution towards its cost in the reception, conveyance and disposal of effluent discharged from the premises to the public sewer as follows:</p> <p>(i) The contribution of £4,000 shall fall due on January 1 each year. For 1998 the licensee shall pay a pro rata amount from the date of grant of this licence to December 31, 1998. The contribution shall be paid within two months of the due date each year.</p> <p>(ii) The contribution of £4,000 shall, in subsequent years, be index linked in accordance with the Consumer Price Index from January 1 1998 to the Index value pertaining at January 1 of each year thereafter.</p> <p>(iii) Notwithstanding the above Dungarvan Urban District Council shall, at all times, reserve the right to alter the annual rate of contribution having regard to the costs incurred in the reception, conveyance and disposal of the Licensee's trade effluent.</p> | <p>Irish Water Charges</p> <p>14.2 The licensee shall pay Irish Water such contribution towards its cost in the reception, conveyance and disposal of effluent discharged from the premises to the public sewer as follows:</p> <p>(i) The contribution of €1.60/m³ of effluent discharged to sewer to be paid within 30 days of being invoiced by Irish Water.</p> <p>(ii) Notwithstanding the above Irish Water shall, at all times, reserve the right to alter the annual rate of contribution having regard to the costs incurred in the reception, conveyance and disposal of the Licensee's trade effluent and based on Guidance from the Commission for Energy Regulator for non-domestic water / wastewater rates.</p> | <p>The current rate for non-domestic effluent discharged to sewer is €1.60/m³.</p> <p>The timing of invoices (monthly, quarterly or biannual) has been left with Irish Water.</p> |

Proposed

Schedule 2(i) - Emissions to Sewer

Emission Point Reference No.: SE 1

Name of Undertaker: Irish Water

Location: E224428, N93099

Volume to be emitted: Maximum in any one day: 37.5 m³
Maximum in any one hour: 4 m³

| Parameter | Emission Limit Value | Emission Limit Value |
|------------------------------|----------------------|----------------------|
| pH | 6 – 9 | |
| | (mg/l) | (kg/day) |
| Lead | 0.05 | 0.0019 |
| Fluoride | 25 | 0.9375 |
| Arsenic | 0.0125 | 0.0005 |
| Aluminium | 5 | 0.1875 |
| Antimony | 0.05 | 0.0019 |
| Total Petroleum Hydrocarbons | 0.01 | 0.00038 |
| BOD | 200 | 7.5 |
| COD | 500 | 18.75 |
| Suspended Solids | 300 | 11.25 |
| Total Ammonia (as N) | 5 | 0.1875 |

Proposed

Schedule 2(ii) – Effluent Treatment Control

Emission Point Reference No.: SE 1

Description of Treatment: Not Applicable

Monitoring:

| Monitoring to be Carried Out | Monitoring Frequency | Monitoring Equipment / Method | Backup Equipment |
|--|----------------------|---|------------------|
| Flow Meter & Composite Sampler Operational | Weekly | Flow meter with Data logger. Flow proportional Composite Sampler | - |

Equipment:

| Control Parameter | Equipment | Backup Equipment |
|-------------------|--|------------------|
| Operational | Pump Flow Meter with Data Logger Flow Proportional Composite Sampler | Standby Pump |

For inspection purposes only.
Consent of copyright owner required for any other use.

Schedule 2 (iii) – Monitoring of Emissions to Sewer

Emission Point Reference No.: SE 1 (MP)

| Parameter | Monitoring Frequency (Note 1) | Analysis Method / Technique |
|------------------------------|----------------------------------|-----------------------------|
| pH | Weekly | Standard Methods |
| Lead | Weekly | Standard Methods |
| Fluoride | Weekly | Standard Methods |
| Arsenic | Weekly | Standard Methods |
| Aluminium | Weekly | Standard Methods |
| | | |
| Total Petroleum Hydrocarbons | Monthly | Standard Methods |
| BOD | Monthly | Standard Methods |
| COD | Monthly | Standard Methods |
| Suspended Solids | Monthly | Standard Methods |
| Total Ammonia (as N) | Monthly | Standard Methods |

Note 1:

24 hour flow proportionate composite sampler to be installed prior to perched contaminated groundwater being discharged into the foul sewer and all samples thereafter shall be collected on a 24 hour flow proportionate composite sample basis.

For inspection purposes only.
Consent of copyright owner required for any other use.

