

## Dorota Richards

---

**From:** Ronan Connolly <rconnolly@water.ie>  
**Sent:** 15 June 2015 17:14  
**To:** Dorota Richards  
**Cc:** Loretta Joyce  
**Subject:** P0301-04 Diageo Ireland Limited - IW S99E Response\_consent\_150615  
**Attachments:** P0301-04 Diageo Ireland Limited - IW S99E Response\_consent\_150615.pdf

Dear Ms Richards,

Further to your letter dated 14<sup>th</sup> April 2015, please see attached, Irish Water's S99E response relating to the Diageo Ireland Limited Industrial Emissions licence review (P0301-04).

Hard copy to follow in post.

If you have any further queries, please do not hesitate in contacting me.

Kind Regards,

Ronan

Ronan Connolly  
Environmental Policy and Licensing Support Officer

**Uisce Éireann**

Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 7, Éire

**Irish Water**

Colvill House, 24-26 Talbot Street, Dublin 1, Ireland

**T:** +353 1 8925386

[rconnolly@water.ie](mailto:rconnolly@water.ie)

[www.water.ie](http://www.water.ie)

 Please consider the environment before printing this e-mail

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

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



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

Uisce Éireann  
Teach Colvill  
24-26 Sráid Thalbóid  
Baile Átha Cliath 1  
Éire

Irish Water  
Colvill House  
24-26 Talbot Street  
Dublin 1  
Ireland

T: +353 1 89 25000  
F: +353 1 89 25001  
[www.water.ie](http://www.water.ie)

Reg No: P0301-04

15<sup>th</sup> June 2015

Dear Ms Richards,

I refer to your letter dated 14<sup>th</sup> April 2015 regarding an application from Diageo Ireland Limited, St. James's Gate, Dublin 8 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

  
Jetty Grant  
Head of Asset Management

## **IRISH WATER RESPONSE**

Irish Water  
Colvill House  
24/26 Talbot Street  
Dublin 1

**Name of Facility:** Diageo Ireland Limited, St. James's Gate, Dublin 8

**Reg. No:** P0301-04

**Location Address:** St. James's Gate, Dublin 8

**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 <sup>Note 1</sup> .	

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

CONSENT CONDITIONS TO BE INCLUDED	
1.	No specified emission to sewer shall exceed the emission limit value or load set out in <i>Schedule B: Emission Limits to Sewer</i> . There shall be no other emissions to sewer of environmental significance.
2.	The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out in <i>Schedule C</i> .
3.	Monitoring and analysis equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge.
4.	The licensee shall submit a proposal for approval to the Agency to install a continuous on-line COD or equivalent monitoring device within two months of the date of grant of this licence. The proposal shall have the agreement of Irish Water. The monitoring system shall be capable of recording accurate, reliable and repeatable COD or equivalent measurements over any 24 hour period. The proposal shall contain full details and proposed timeframes relating to the installation and location of the monitoring system.
5.	The licensee may submit a proposal for the agreement of the Agency, to amend the frequency of monitoring as set out in <i>Schedule C</i> . The proposal shall have the agreement of Irish Water.
6.	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 process effluent and to take samples of the process effluent.
7.	All automatic monitors and samplers shall be functioning at all time (except during maintenance and calibration) when the activities are being carried out unless alternative sampling and monitoring equipment has been agreed in writing by the Agency for a limited period. In the event of a malfunction of any continuous monitoring equipment, the licensee shall contact the Agency as soon as practicable

and alternative equipment 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.
8. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.
9. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and off-site points as required by Irish Water and the Agency.
10. The licensee shall maintain, or have maintained, the on-site effluent treatment systems.
11. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing that 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.
12. The licensee shall at no time discharge or permit to be discharged into the wastewater network any matter or thing that is capable of presenting any risk to Agency or Irish Water staff or its agents fulfilling any of their duties or causes nuisance odours to arise from the sewer network.
<p>13. The licensee shall provide to Irish Water plans and details in formats outlined below within 6 months of the date of grant of this licence. These shall include;</p> <ul style="list-style-type: none"> <li>➤ Location of pipes and sewers, manholes, storage tanks, effluent treatment systems.</li> <li>➤ Diameter, material, upstream invert level, downstream invert level, condition for all sewers on site.</li> <li>➤ Cover level, invert level, chamber dimensions for each manhole on site.</li> <li>➤ Details of effluent treatment systems, including dimensions.</li> <li>➤ The condition of all sewers and manholes.</li> <li>➤ Plans and details of the discharge point to the Irish Water sewer.</li> <li>➤ Location and invert level of the discharge point or chamber.</li> <li>➤ Details of the discharge chamber including internal dimensions, type of construction, incoming and outgoing pipe diameter, incoming and outgoing pipe material, internal features or devices such as flow control and backdrops.</li> <li>➤ The Plan drawings and relevant information shall be provided in ESRI SHP File or AutoCAD DWG format with attributes geo-coordinated to Irish National Grid or Irish Transverse Mercator. All Levels shall be to Malin Head OD. The adopted coordinate system shall be clearly identified.</li> </ul>
14. 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.
15. 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.

<p>16. A summary report of volumes of effluent discharged to the sewer along with monitoring and analysis data as specified in schedule B and C shall be forwarded on a monthly basis or as requested to both :</p> <p><b>Local Authority Contact :</b> Chief Technician  <b>Address:</b> Dublin City Council, Drainage Division, Pollution Control Section  <b>E-mail:</b> <a href="mailto:john.collins@dublincity.ie">john.collins@dublincity.ie</a></p> <p style="text-align: center;">&amp;</p> <p><b>Irish Water:</b> <a href="mailto:WasteWaterComplianceEasternMidlands@water.ie">WasteWaterComplianceEasternMidlands@water.ie</a></p>
<p>17. In the event of any incident which relates to a discharge to sewer, having taken place, the licensee shall notify, by telephone and e-mail, the Agency along with both:</p> <p><b>Local Authority Contact :</b> Chief Technician  <b>Address:</b> Dublin City Council, Drainage Division, Pollution Control Section  <b>E-mail:</b> <a href="mailto:john.collins@dublincity.ie">john.collins@dublincity.ie</a>  <b>Phone number during Office Hours:</b> 01-2222222  <b>Phone number outside of Office Hours:</b> 01- 6796186</p> <p style="text-align: center;">&amp;</p> <p><b>Irish Water:</b> <a href="mailto:WasteWaterComplianceEasternMidlands@water.ie">WasteWaterComplianceEasternMidlands@water.ie</a></p> <p><b>Phone Number:</b> 1890 278 278</p>
<p>18. 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 the Agency and Irish Water.</p>
<p>19. A log detailing the usage of all cooling water and boiler water treatment chemicals shall be kept by the Licensee and submitted on an annual basis to both:</p> <p><b>Local Authority Contact :</b> Chief Technician  <b>Address:</b> Dublin City Council, Drainage Division, Pollution Control Section  <b>E-mail:</b> <a href="mailto:john.collins@dublincity.ie">john.collins@dublincity.ie</a></p> <p style="text-align: center;">&amp;</p> <p><b>Irish Water:</b> <a href="mailto:WasteWaterComplianceEasternMidlands@water.ie">WasteWaterComplianceEasternMidlands@water.ie</a></p>
<p>20. Best available technology (BAT) shall be used to prevent, minimise, manage and treat pollutants in the wastewater discharge to sewer.</p>
<p>21. Within 3 months of the date of grant of this licence, in consultation with Irish Water, the licensee shall agree a schedule on the production of a Development Impact Assessment (DIA).  The DIA shall;</p> <ol style="list-style-type: none"> <li>I. assess the effects of the effluent load from the site on the wastewater network and receiving waters having regard to the requirements of the Wastewater Discharge (Authorisation) regulations 2007,</li> <li>II. include a programme of works that addresses an achievable reduction of the daily wastewater hydraulic and organic loading to the wastewater network and the balancing of the daily wastewater hydraulic and organic loading to the wastewater network.</li> </ol>

22. The licensee shall implement the plan for the separation of surface waters from foul waters on-site as conditioned in Condition 5.4.8 of P0301-03 and commission all associated works. A progress report on the implementation of the plan and the status of associated works shall be forwarded to Irish Water within 1 month of the date of grant of this licence.
23. A fee shall be payable to Irish Water by the Licensee for any required compliance monitoring outside of scheduled EPA monitoring. This charge covers the cost of sample collection by the Irish Water representative and chemical analysis. Payment is to be made on demand.
24. 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. The charges associated with the Trade effluent discharge will be in accordance with the Local Authorities current charging regime and will remain in place until a Non-Domestic tariff structure has been approved by the Commission for Energy Regulation (CER) and implemented by Irish Water. These charges will be billed for by Dublin City Council until further notice. Payment to be made on demand.

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

**Schedule B: Emission Limits**

Emission Point Reference No.: SE- 1 (Central Laboratory Monitoring Reference 830-06)  
Grid Reference 314302E, 234212N

Emission to *(sewer description)*: Watling Street Sewer

Volume to be emitted: Maximum in any one day: 7,000m<sup>3</sup>  
Mean per day (averaged over a month) <sup>Note 4</sup>: 4,500 m<sup>3</sup>  
Maximum in any one hour: 300 m<sup>3</sup>

Parameter		Emission Limit Value <sup>Note 1</sup>	
Temperature <sup>Note 2</sup>		42°C (max)	
PH <sup>Note 3</sup>		6 - 10	
		Mean concentration (mg/l)	Mean loading (kg/day)
BOD	-Daily	6,000	29,200
	-Weekly	4,400	18,600
	-Monthly	3,800	16,600
	-Annually	3,600	14,500
COD	-Daily	11,100	53,500
	-Weekly	7,800	29,600
	-Monthly	6,600	26,900
	-Annually	5,800	23,500
Suspended Solids <sup>Note 5</sup>	Daily	1,400	9,800
	Annually	900	3,400
Sulphate (as SO4)	Daily	400	2,800
Detergents (as MBAS)	Daily	100	700
Fats, oils, grease	Daily	100	700
Total Nitrogen	Daily	50	350
Total Phosphorous	Daily	50	350

**Note 1:** These limits (including the derogations in Note 4 and Note 5 below) shall apply for a period of twelve months from the date of issue of licence P0301-04 and thereafter revert to P0301-03 limits with the exception of BOD, COD & Suspended Solids limits until such time as new limits are agreed OR remain in place if Irish Water and Diageo agree to extend the arrangement in writing within the twelve month period.

**Note 2:** No temperature shall exceed the daily limit value plus 5 degrees for more than 1.5 hours.

**Note 3:** No 30 minutes pH value shall exceed the daily limit by more than 1 pH unit.

**Note 4:** Irish water grants a temporary derogation on Volume to be emitted -Mean per day (averaged over a month) from 4,500m<sup>3</sup> to 4,800m<sup>3</sup> for a period of twelve months from the date of issue of licence P0301-04 after which the limit shall revert to 4,500 m<sup>3</sup>.

**Note 5:** Irish Water grants a temporary derogation for suspended solids daily limit from 1,400 mg/l to 1,700 mg/l for a period of twelve months from the date of issue of licence P0301-04 after which the limit shall revert to 1,400 mg/l.



## Frequency of Monitoring Process Effluent to Sewer

### Schedule C

Emission Point Reference No.: SE-1

Parameter	Monitoring Frequency	Analysis Method/Technique
Flow to sewer	Continuous	On-line continuous Flow meter with recorder
Temperature	Continuous	On-line continuous Temperature probe with recorder
pH	Continuous	On-line continuous pH Probe and recorder
BOD	Daily <sup>note 1</sup>	Standard Method
COD <sup>Note 2</sup>	Daily <sup>note 1</sup>	Standard Method
COD or equivalent <sup>Note 3</sup>	Continuous	As agreed by the Agency
Suspended Solids	Daily <sup>note 1</sup>	Standard Method
Sulphates (as SO <sub>4</sub> )	Monthly <sup>note 1</sup>	Standard Method
Detergents (as MBAS)	Monthly <sup>note 1</sup>	Standard Method
Fats Oils and Grease	Monthly <sup>note 1</sup>	Standard Method
Ammoniacal N	Monthly <sup>note 1</sup>	Standard Method
Total Nitrogen	Monthly <sup>note 1</sup>	Standard Method
Total Oxidised Nitrogen	Monthly <sup>note 1</sup>	Standard Method
Total Phosphorus	Monthly <sup>note 1</sup>	Standard Method

**Note 1:** All samples other than flow, pH, and temperature shall be collected on a 24 hour flow proportionate composite sample basis.

**Note 2:** Daily monitoring of COD may be discontinued in accordance with Condition 5

**Note 3:** The licensee shall install an on-line continuous COD or equivalent monitoring device as agreed by the Agency in accordance with Condition 4. COD or equivalent parameter shall be monitored continuously within 6 months of the date of grant of this licence.

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