Dorota Richards

Subject: FW: Pacon Waste & Recycling Ltd (Reg. No. P1014-01) Objection to Section 99E consent conditions - IW Response 20151125

Attachments: Pacon Waste Recycling Ltd - Fingal P1014-01.pdf

From: Ronan Connolly [mailto:rconnolly@water.ie]
Sent: 25 November 2015 16:56
To: Magnus Amajirionwu
Cc: Peter McNulty; LA_jikavanagh
Subject: Pacon Waste & Recycling Ltd (Reg. No. P1014-01) Objection to Section 99E consent conditions - IW Response 20151125

Dear Mr Amajirionwu,

I refer to EPA letter dated 21st October 2015 (also attached) regarding an objection made by Pacon Waste & Recycling Ltd (Reg. No. P1014-01) relating, in part, to Irish Water's consent conditions to discharge to sewer under Section 99(E)of the EPA Act as amended.

Irish Water's comments in relation to the Pacon Waste & Recycling Ltd objections outlined in *Section 1.1 Grounds for Objection* of Document Title: "Objection to PD", Document File Name: "150106 – Pacon Waste FI Response-2015.10.91 –F" are as follows;

1. *Schedule B3 - Sewer Emissions*

Fingal County Council (acting for and on behalf of Irish Water) met with Pacon Waste & Recycling Ltd (28th April 2015) to discuss their application and emissions to sewer. This meeting informed the process of setting Emission Limit Values (ELVs) for discharges to sewer outlined in their Industrial Emissions Licence application. At this meeting, Pacon Waste & Recycling Ltd informed Fingal County Council that 3 trucks would be using the onsite wheel wash and it was agreed that effluent arising from wheel wash activities would amount to less than 1 m^3 per day and could not exceed 0.6 m^3 per hour due to the type of wheel wash unit onsite. Hence a Maximum volume limit of 1 m^3 per day and 0.6 m^3 per hour were set out in Irish Water's Section 99(E) consent response to the EPA dated 18th May 2015.

The originally proposed 50m^3 per day and maximum rate of 5 m^3 per hour set out in Attachment E3 and Table E.3(i) Emissions to Sewer of the Pacon Waste & Recycling Ltd Application Form were considered excessive for the wheel wash activities. Irish water is satisfied to consider a reassessment of the discharge volume ELVs though a Technical Amendment of the licence at a later date if operational activities prove the current volume limits of 1 m^3 per day and 0.6 m^3 per hour are insufficient.

2. *Schedule C.4.1 – Monitoring of Emissions to Sewer*

Irish Water considers the monitoring frequencies set out in Schedule C.4.1 appropriate for monitoring the discharge to sewer arising from the wheel wash activity. Irish water is satisfied to consider a reassessment of the monitoring frequencies through a Technical Amendment of the licence at a later date if operational activities and monitoring results prove the risk associated with the discharge to sewer to be low.

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

Kind Regards,

Ronan

Ronan Connolly
Environmental Policy and Licensing Support Officer

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Mr. Ronan Connolly
Environmental Policy & Licensing Support Specialist
Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

21 October 2015 Reg No: P1014-01

Dear Mr Connolly

I refer to the licence application by Pacon Waste & Recycling Ltd, 4F, Fingal Bay Business Park, Balbriggan, County Dublin (Reg. No.P1014-01) and in particular to the proposed determination that issued on 22nd September 2015.

The Agency has received an objection from the applicant on 19th October 2015. Part of the applicant's objection relates to conditions attached to your Council's consent to discharge to sewer under Section 99(E) of the EPA Act as amended.

In light of the above, I enclose a copy of the objection and I am to request your comments on the objection insofar as it relates to the conditions imposed by your Council.

An early response to this letter would be appreciated so that consideration of this application may proceed. Mr Magnus Amajirionwu is dealing with this matter and can be contacted at the Environmental Licensing Programme of the Agency, E.P.A. Headquarters, PO Box 3000, Johnstown Castle Estate, Wexford, County Wexford, Tel. No. 053-9160600 if you have any queries.

Yours sincerely

Dorota Richards

Dorota Richards
Environmental Licensing Programme
Office of Climate, Licensing & Resource Use

Obj. No 1

Dorota Richards

From:	Carla McKenna <Carla.McKenna@pacon.ie>
Sent:	19 October 2015 10:33
To:	Licensing Staff
Subject:	New Applicant objection entered for Reg no: P1014-01. (Reference Number: P1014-01-151019103239)
Attachments:	Pacon PD Objection P1014-01.pdf
Importance:	High

Objection submitted on:	19/10/2015 10:32
Title:	Mrs
First Name:	Carla
SurName:	McKenna
Organisation Name:	Applicant
Address Line 1:	4f Fingal Bay Business Park
Address Line 2:	Balbriggan
Address Line 3:	Dublin
County:	Dublin
Post Code:	0000
Email:	Carla.McKenna@pacon.ie
Objector Type:	Applicant
Oral Hearing:	No

Objection to Proposed Decision

Pacon Waste & Recycling Ltd

Reg No: P1014-01

McCarthy
Keville
O'Sullivan

Planning & Environmental Consultants

DOCUMENT DETAILS

Client:	**Pacon Waste and Recycling Ltd.**
Project title:	**IE Licence Application**
Project Number:	**150106**
Document Title:	**Objection to PD**
Doc. File Name:	**150106 – Pacon Waste FI Response – 2015.10.19 – F**
Prepared By:	**McCarthy Keville O'Sullivan Ltd.** **Planning & Environmental Consultants** **Block 1, G.F.S.C.** **Moneenageisha Road, Galway**

McCarthy Keville O'Sullivan

Document Issue:

Rev	Status	Issue Date	Document File Name	Author(s)	Approved By:
01	A	19.10.2015	150106 – Pacon Waste FI Response – 2015.10.19 – F	JS	MW

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1 INTRODUCTION

The applicant, Pacon Waste & Recycling Ltd (Pacon), Stephenstown Business Park, Balbriggan, Co Dublin, wishes in accordance with Section 87(5) of the EPA Act 1992 as amended to object to Condition 4.3, Schedule B3 and Schedules C.3.2 and C.4.1 of the Proposed Determination for IED Licence No P1014-01.

Condition 4.3 links noise emission limits to the sites boundary rather than the nearest noise sensitive locations. Schedule B3 sets sewer volume emissions at levels not achievable at the facility and Schedules C.3.2 and C.4.1 set monitoring frequencies which do not appear to be amendable subject to agreement with the Agency.

The appropriate fee for the objection (€253) has been electronically transferred to the Agency.

1.1 Grounds for Objection

Condition 4.3 – Noise
*Noise from the installation shall not give rise to sound pressure levels **(LAeq,T)** measured at the boundary of the installation which exceed the limit value(s).*

It is requested that this Condition be amended to reflect Condition 5.5 and Schedule C.5 which set limits for tonal components or impulsive components to noise at Noise Sensitive Locations and requires monitoring at Noise Sensitive Locations only.

Setting limits at the boundary of the facility is not practical given the sites location in a busy industrial estate. The proposed monitoring locations are the Noise Sensitive Locations and so limits should be applied at these locations.

Schedule B3 – Sewer Emissions
Schedule B3 sets the Maximum Volume to be emitted in any one day at 1m³ and the maximum rate per hour at 0.6m³. The kg/day limits for the various parameters are calculated based on these emission volumes and will not be achievable at the facility.

Attachment E3 and Table E.3(i) Emissions to Sewer of the Application Form set the proposed emission rate at 50m³ per day and a maximum rate of 5m³ per hour.

The emission volumes applied for and outlined in Attachment E3 and Table E.3(i) are based on the discharge from the facility truck wash to the municipal foul sewer. It is understood that sanitary discharges do not form part of the IED licence. While it is not expected that the facility will always discharge 50m³ per day, this limit is requested in order to allow for particular days where the truck wash may be busy. It is understood that the discharge volume and quality will be continuously monitored in accordance with Schedule C.4.1.

Schedules C.3.2 Monitoring of Storm Water Discharges and C.4.1 Monitoring of Emissions to Sewer.

Both Schedules C.3.2 and C.4.1 set onerous monitoring frequencies for storm and wastewater discharges. It is requested that both Schedules be amended to allow for amendments subject to Agency agreement (*'or as otherwise agreed by the Agency'*). In the event that monitoring shows a quality of discharge consistently below the emission limit and trigger values the applicant may request amendments to either the frequency or parameters to be monitored.