

**Ms Noeleen Keavey,
Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use
EPA Headquarters,
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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

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Reg No: P0886-02

05 May 2016

Dear Noeleen,

I refer to your letter dated 28th January 2016 regarding an application from Rottapharm Limited, Damastown Industrial Park, Damastown Townland, Mulhuddart, Dublin 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



**Mark O Callaghan,
Authorised Signatory**

IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: Rottapharm Limited

Reg. No: P0886-02

Location Address: Damastown Industrial Park, Damastown Townland, Mulhuddart, Dublin 15, Dublin.

Consent granted subject to the consent conditions outlined below.	Yes
Consent granted without conditions.	
Consent refused	

CONSENT CONDITIONS TO BE INCLUDED	
1. 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 trade effluent.	
2. No specified emission to sewer shall exceed the emission limit values set out in Schedule B : Emission Limits to Sewer	
3. The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out in Schedule C. Representative samples of the final effluent shall be taken by the Licensee and tested for the chemical and physical characteristics conditioned in this licence using standard methods. The frequency of sampling shall be as necessary but shall not be less than frequencies set out in schedule C. The costs of all such tests shall be borne by the Licensee.	
4. The Licensee shall at no time discharge or permit the discharge into the sewer of any liquid matter or thing which would constitute a danger to sewer maintenance personnel working in the wastewater network or wastewater treatment plant	
5. The Licensee shall at no time discharge or permit the discharge into the sewer of any liquid matter or thing which would give rise to flammable or explosive vapours in the receiving wastewater network.	
6. The Licensee shall at no time discharge or permit the discharge into the sewer of any liquid matter or thing which would give rise to any reaction within the sewer or cause the release of nuisance odours from the wastewater network either directly or indirectly following mixing with other wastewater within the network.	
7. The Licensee shall at no time discharge or permit the discharge into the sewer of any liquid matter or thing which cannot be appropriately treated at the downstream wastewater treatment plant, causes the liberation of by-products detrimental to either the wastewater network or treatment plant or causes impairment of the receiving environment and ecosystem to which the wastewater treatment plant discharges.	

8. The Licensee shall at no time discharge or permit the discharge into the sewer of any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature 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.
9. All trade effluent arising from the facility shall be collected and discharged to Irish Water's foul sewer as indicated on submitted plans and particulars and in accordance with the environmental statement which accompanied the licence review application.
10. Only trade effluent wastewater which is generated within the site boundary as a result of licensed activities shall be permitted to be discharged to sewer.
<p>11. The licensee shall provide to Irish Water plans and details in formats outlined below within 6 months of the date of the commencement of licensed activities. These shall include;</p> <ol style="list-style-type: none"> I. Location of pipes and sewers, manholes, storage tanks, effluent treatment systems. II. Diameter, material, upstream invert level, downstream invert level, condition for all sewers on site. III. Cover level, invert level, chamber dimensions for each manhole on site. IV. Details of effluent treatment systems, including dimensions. V. The condition of all sewers and manholes. VI. Plans and details of the discharge point to the Irish Water sewer. VII. Location and invert level of the discharge point or chamber. VIII. 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. IX. 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.
12. Monitoring and analyses equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge to sewer.
13. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.
14. The licensee shall maintain the on-online flow measurement device to accurately record the volume and rate of effluent discharged to sewer.
15. Non-trade effluent wastewater (e.g. firewater, accidental spillages) which occurs on site shall not be discharged to the sewer without the prior written authorisation of Irish Water.
<p>16. The Licensee shall ensure that trade effluent arising from any canteen facilities containing fats, oils and grease (FOG) pass through grease removal equipment before discharging to sewer.</p> <p>Grease removal equipment employed shall meet the following specifications;</p> <ol style="list-style-type: none"> I. Passive grease separators must comply with the requirements of I.S. EN 1825: Parts 1 & 2. II. Grease removal units must comply with the requirements of the US Plumbing and Drainage Institute (PDI) G101 guidelines.
17. The licensee shall notify Irish Water along with the Agency in advance of any

changes which may result in a change in the nature, characteristics or volume of trade effluent discharged to sewer.

18. The Licensee shall have a representative sample(s) of the trade effluent tested for any other parameters which may be reasonably required by Irish Water for the purposes of assessing the effects of the trade effluent on:

- I. the health and safety of wastewater network and treatment plant maintenance personnel;
- II. the general integrity of the wastewater network;
- III. the operations of the downstream wastewater treatment plant; and
- IV. wastewater sludge generated at the downstream wastewater treatment plant.

19. The Licensee shall keep records in such a form as Irish Water may require of the volume, rate of discharge, nature and composition of the trade effluent discharged into the sewer and these shall be available at all reasonable times for inspection by Authorised Persons of Irish Water.

To this end the Licensee shall within one month of the end of each quarter send summary reports via e-mail to:

Local Authority Contact : Jim Kavanagh

Address: Environment and Water Services, P.O. Box 174, County Hall, Main St., Swords, Co. Dublin.

E-mail: jim.kavanagh@fingal.ie

&

Irish Water: TER@water.ie (TER = Trade Effluent Returns)

The quarterly summary reports shall include, as the minimum, the following information:

- I. all trade effluent monitoring results for the reporting period including certificates of analysis;
- II. daily trade effluent discharge volumes (minimum, maximum and average);
- III. hourly trade effluent discharge rates (minimum, maximum and average);
- IV. details of any non-compliances;
- V. reasons for non-compliance; and
- VI. proposals for prevention of a recurrence of the non-compliance with trade effluent ELVs.

20. In the event of any incident which relates to discharge to sewer, having taken place, the licensee shall notify Irish Water along with the Agency, by telephone and e-mail.

Irish Water: TER@water.ie (TER= Trade Effluent Returns)

Phone Number: 1890 278 278

An incident shall be considered to be any trade effluent discharge which:

- I. is a major breach of emission limits to sewer;
- II. would constitute a danger to sewer maintenance personnel working in the wastewater network or treatment plant;

<p>III. would be injurious to the construction of the wastewater network or treatment plant;</p> <p>IV. would interfere with the operations of the downstream wastewater treatment plant and supporting infrastructure; or</p> <p>V. would render wastewater sludge generated at the downstream wastewater treatment plant unsuitable for disposal to agricultural lands or other approved disposal routes.</p>
<p>21. The Licensee shall maintain, or have maintained any on-site effluent treatment systems.</p>
<p>22. The final trade effluent generated onsite shall pass through appropriately sized screening before discharge to sewer so as to remove gross solids and prevent their entry to the public sewer if required by Irish Water. The screening apparatus shall be located upstream of the final trade effluent sampling point.</p>
<p>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.</p>
<p>24. The Licensee shall pay amounts as may be determined by Irish Water having regard to the expenditure incurred or to be incurred by it in monitoring, treating and disposing of discharges of trade effluent, sewage effluent or other matter to sewer. These charges shall 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 Fingal County Council until further notice. Payment to be made on demand.</p>

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Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Emission Point Reference No.: SE 1 E 305361, N241352

Volume to be emitted: Maximum in any one day: 50 m³
Maximum rate per hour: 8 m³

Parameter	Emission Limit Value	
	Concentration (mg/l)	Daily Load (kg/day)
pH	6-9	
Temperature	35°C	
Toxicity	10 TU	
BOD	2,000	100
COD	4,000	200
Suspended Solids	400	20
Sulphate (as SO ₄)	400	20
Chloride	1,000	50
Oils, Fats and Grease	100	5
Methylene Blue Active Substances (MBAS)	100	5

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission Point Reference No.:

SE 1 E 305361, N241352

Parameter	Monitoring Frequency (Note 1 & 2)	Analysis Method/Technique
Flow to sewer	Continuous	Flow meter
pH	Continuous	pH meter
Temperature	Continuous	Temperature Probe
Biochemical Oxygen Demand	Monthly	Standard Methods
Chemical Oxygen Demand	Monthly	Standard Methods
Suspended solids	Monthly	Standard Methods
Sulphate	Monthly	Standard Methods
Oils, Fats and Grease	Monthly	Standard Methods
Methylene Blue Active Substances (MBAS)	Monthly	Standard Methods
Chloride	Monthly	Standard Methods
Full Metals Suite	Annually	Standard Methods
Active Pharmaceuticals	As requested	Standard Methods
Toxicity	As requested	Standard Methods
Respirometry	As requested	Standard Methods

Note 1.

All samples excluding those for pH and temperature shall be collected on a 24 hour flow proportional composite sampling basis.

Note 2.

Sampling shall take place on alternate week days on a rolling basis to ensure representative samples are obtained for site operations which may vary across the working week.