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

Reg No: P0690-03

14th June 2016

Dear Mr Doyle,

I refer to your Section 99E notice dated 11th of May 2016 regarding an application from C&F Automotive Limited t/a Iralco, Collinstown, Mullingar, Co. Westmeath for an Industrial Emissions Licence review (P0690-03).

Irish Water is satisfied to grant consent to the C&F Automotive Limited discharge to sewer subject to consent conditions attached.

Irish Water notes that it has inherited a situation whereby C&F Automotive Ltd is connected to the sewer (outfall pipe) downstream of the Collinstown Waste Water Treatment Plant (D0485-01). Irish Water also notes the view of the Agency in relation to the compliance point (SW001) for the Collinstown agglomeration as outlined in correspondence on the public file (P0690-02) dated 9th July 2015.

Accordingly, in order to achieve compliance with the Collinstown Waste Water Discharge Authorisation (WWDA) D0485-01, as enforced by the Agency, Irish Water are required to impose some Emission Limit Values on C&F's discharge which mirror those set out in WWDA D0485-01.

Yours sincerely,



Authorised Signatory,
Asset Management,
Irish Water

IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: C & F Automotive Limited t/a Iralco **Reg. No:** P0690-03

Location Address: Collinstown, Mullingar, Co. Westmeath

Consent granted subject to the consent conditions outlined below.	Yes
Consent granted without conditions.	N/A
Consent refused ^{Note 1} .	N/A

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.
5.	Within 3 months from the date of grant of this licence, the Licensee shall complete a feasibility study into the repair and reuse of C&Fs original trade effluent outfall pipe which discharged directly to the Yellow River.
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 flammable or explosive vapours in the receiving wastewater network.
7.	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.
8.	The Licensee shall at no time discharge or permit the discharge into the sewer of any liquid matter or thing which causes the liberation of by-products detrimental to

the wastewater network or causes impairment of the receiving environment and ecosystem to which it discharges.
9. 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.
10. All trade effluent arising from the named premises as per above shall be collected and discharged to Irish Water's sewer as indicated on submitted plans and particulars and in accordance with the environmental statement which accompanied the licence application.
11. 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>12. 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.
13. Monitoring and analyses equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge to sewer.
14. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.
15. The licensee maintain the on-online flow measurement device to accurately record the volume and rate of effluent discharged to sewer.
16. 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>17. The Licensee shall ensure that any 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.

18. 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.

19. 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 maintenance personnel;
- II. the general integrity of the wastewater network; and
- III. the receiving environment and ecosystem to which it discharges.

20. 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:

Westmeath County Council

&

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.

21. 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;
- III. would be injurious to the construction of the wastewater network;
- IV. would interfere with the operations of the downstream wastewater supporting infrastructure; or
- V. would cause harm to the receiving environment and ecosystem.

<p>22. The Licensee shall arrange for sampling at WW1 to occur simultaneously with the required sampling by Irish Water at sampling location SW001 as per Waste Water Discharge Authorisation D0485-01.</p>
<p>23. A fee shall be payable to Irish Water by the Licensee for any required monitoring outside of scheduled EPA monitoring. This includes the simultaneous sampling of the discharge from Collinstown WWTP in conjunction with the sampling required by Irish Water at SW001 as set out Waste Water Discharge Authorisation D0485-01. This charge covers the cost of chemical analysis of the sample collected by the Irish Water representative. 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 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 Westmeath 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.: **WW1**

Emission to (*sewer description*): Irish Water outfall pipe at MH 13

Volume of Trade effluent emitted: Maximum in any one day: 80 m³
 Maximum rate per hour: 5 m³

Parameter	Emission Limit Value	
	Concentration (mg/l)	Load (kg/day)
Temperature	20°C	
pH	6 - 9 pH Units	
Toxicity	5 TU	
BOD	20	1.2
COD	100	-
Suspended Solids	30	-
Nitrates as N	100	-
Total Ammonia	3 ^{Note 1} 1.5 ^{Note 2}	- 0.14 ^{Note 2}
Total Hydrocarbons	4	-
Total Phosphorus	1	-
Orthophosphate	0.6	-
Detergents (as MBAS)	5	-
Sulphate	800	-
Nickel – Annual average limit	0.4 ^{Note 1} 0.15 ^{Note 2}	- -
Fluoride – Annual average limit	5 ^{Note 1} 3.5 ^{Note 2}	- -
Chromium III	0.04	-
Chromium VI	0.03	-
Aluminium	5	-

Note 1. Emission limit values applicable until 31st December 2018.

Note 2. Emission limit values applicable from 1st January 2019.

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission Point Reference No.:

WW1

Parameter	Monitoring Frequency	Analysis Method/Technique
Flow	Continuous	On-line continuous Flow meter with recorder
Temperature	Continuous	On-line continuous Temperature Probe and recorder
pH	Continuous	On-line continuous pH probe with recorder
COD	Daily ^{Note 1}	Standard Method
BOD	Weekly ^{Note 1}	Standard Method
Suspended Solids	Weekly ^{Note 1}	Standard Method
Total Hydrocarbons	Quarterly ^{Note 1}	Standard Method
Nitrates (as N)	Weekly ^{Note 1}	Standard Method
Total Ammonia (as N)	Weekly ^{Note 1}	Standard Method
Total Phosphorus (as P)	Weekly ^{Note 1}	Standard Method
Orthophosphate	Quarterly ^{Note 1}	Standard Method
Fluoride	Monthly ^{Note 1}	Standard Method
Lead	Annually ^{Note 1}	Atomic Absorption / ICP
Nickel	Weekly ^{Note 1}	Atomic Absorption / ICP
Chromium III	Quarterly ^{Note 1}	Atomic Absorption / ICP
Chromium VI	Quarterly ^{Note 1}	Atomic Absorption / ICP
Aluminium	Weekly ^{Note 1}	Atomic Absorption / ICP
Detergents (as MBAS)	Quarterly ^{Note 1}	Standard Method
Toxicity ^{Note 2}	Annually	To be agreed by the Agency

Note 1.

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

Note 2:

The number of toxic units (Tu) = 100/x hour EC/LC50 in percentage vol/vol so that higher Tu values reflect greater levels of toxicity. For test regimes where species death is not easily detected, immobilisation is considered equivalent to death.