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Jennifer Cope
Inspector
Office of Environmental Sustainability
Regional Inspectorate
McCumiskey House
Richview
Clonskeagh Road
Dublin 14

18th July 2017

Dear Jennifer,

RE: Discharge to Sewer for P0690-03 C & F Automotive Limited t/a Iralco

Irish Water wishes to advise the Agency that it has reviewed the conditions to be set for discharges to sewer for the C & F Automotive Limited t/a Iralco Licence Application.

Following the review Irish Water wishes to retract the Consent for discharge to sewer that was submitted to the Agency on the 16 June 2016

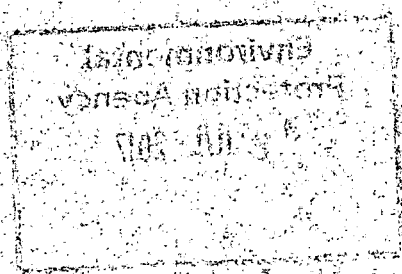
A revised Consent to Discharge to Sewer is appended to this letter for inclusion in Industrial Emission Licence.

I trust the above is satisfactory, if you have any queries please do not hesitate in contacting me.

Yours sincerely

Michael O'Leary
Acting Head of Environmental Regulation

Environmental Protection Agency
18 JUL 2017



IRISH WATER RESPONSE
Re: Section 52 of the Waste Management Act 1996, as amended

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: Tick one of the following statements in the box hereunder:

Consent granted subject to the consent conditions outlined below.	Yes
Consent granted without conditions.	
Consent refused Note 1	

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

Indicate either "Yes" or "No" to the request to include the condition(s) below in the licence as follows:

	GENERAL CONSENT CONDITIONS	Condition to be Included *(Yes/No)*
1.	Other than the trade effluent authorised to be discharged under this licence, the licensee shall at no time discharge or cause or permit to discharge into sewer trade effluent or any other matter unless authorised in writing by Irish Water.	Yes
2.	Monitoring and analysis equipment shall be installed, operated and maintained as necessary, so that all monitoring accurately reflects the emission/discharge.	Yes
3.	The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out below and as in accordance with *Schedule C: Control & Monitoring*, of this licence. (i) Sampling and analysis shall be undertaken by competent staff in accordance with documented operating procedures. (ii) Such procedures shall be subject to a programme of Analytical Quality Control using appropriate control standards with evaluation of test responses. (iii) Where any analysis is sub-contracted it shall be outsourced to a competent laboratory.	Yes
4.	The licensee shall ensure that any trade effluent generated from canteen activities shall pass through appropriate grease removal equipment prior to discharge to sewer.	Yes
5.	The licensee shall **establish, maintain and implement** (text highlighted in black bold for new licences only) / maintain and implement (text highlighted in green bold for reviews only) a detailed programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment or as otherwise approved in writing by IW.	Yes
6.	A summary report of volumes of trade effluent and other matter discharged to the sewer along with monitoring and analysis data as specified in *Schedule B: Emission Limits to Sewer* and *Schedule C: Control & Monitoring*, of this licence shall be forwarded to both Irish Water and the Local Authority in a manner and timeframe as may be specified by Irish Water.	Yes
7.	The licensee shall **prepare, maintain and implement** (text highlighted in black bold for new licence only) / maintain and implement (text highlighted in green bold for reviews) a Schedule of Environmental Objectives and Targets. The Schedule shall, as a minimum, provide for a review of all operations and processes, including an evaluation of practicable options, for energy and resource efficiency, the use of	Yes

	cleaner technology, cleaner production and the prevention, reduction and minimisation of waste and shall include waste reduction targets, reduction and diversion of storm water runoff to sewer. The Schedule shall include time frames for the achievement of set targets and shall address a five-year period as a minimum. The schedule shall be reviewed annually, and submitted to Irish Water as requested.	
8.	The licensee shall pay to Irish Water such sum as may be determined from time to time, having regard to the variations in the cost of providing drainage and the variation in effluent reception and treatment costs. Payment is to be made on demand from Irish Water.	Yes
9.	Silt Traps and Oil Separators The Licensee shall, within six months of date of grant of this licence, install and maintain silt traps and oil separators at the Facility: (i) Silt traps to ensure that all storm water discharges, other than from roofs, from the facility pass through a silt trap in advance of discharge; (ii) An oil separator on the storm water discharge from yard areas. The separator shall be a Class I Class II full retention/by-pass separator. <<EPA to select as appropriate>>. (iii) The silt traps and separator shall be in accordance with I.S. EN 858-2: 2003 (separator systems for light liquids).	No
10.	The licensee shall conclude an end user agreement with Irish Water.	Yes
11.	In the event of any incident which relates to discharges to sewer having taken place, the licensee shall notify Irish Water and the Local Authority, in the manner prescribed by Irish Water, as soon as practicable after such an incident.	Yes
12.	No alteration to, or reconstruction in respect of, the activity, or any part thereof, that would, or is likely to, result in: (i) a material change or increase in: ▪ the nature or quantity of any emission; ▪ the abatement/treatment or recovery systems; ▪ the range of processes to be carried out; ▪ the fuels, raw materials, intermediates, products or wastes generated; or (ii) any changes in: ▪ site management, infrastructure or control with adverse environmental significance; shall be carried out or commenced without prior notice to, and without the approval of, the Agency and/or Irish Water as appropriate.	Yes

End User Agreement definition proposed to be included in the Glossary of Terms for the IED/Waste Licences:

'End User Agreement: "An agreement between the licensee and Irish Water which provides for the contractual conditions and arrangements relating to the acceptance of, and treatment by, Irish Water of the Licensee's trade effluent and wastewater."

ADDITIONAL GENERAL CONSENT CONDITIONS OTHERWISE NOT PROVIDED FOR IN THE LICENCE In respect of discharges or emissions to sewers, in accordance with Section 99E of the Environmental Protection Agency Act 1992, as amended. *(Specify, as required)*
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.
The Licensee shall arrange for sampling at WW1 to occur simultaneously with the required sampling by Irish water at sampling location SW001 as per Wastewater Discharge Licence D0485-01.

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 to be emitted: Maximum in any one day: 80 m3
Maximum rate per hour: 5 m3

Parameter *(delete parameters which are not applicable)*	Emission Limit Value	
	Concentration (mg/l)	Daily Load (kg/day)
BOD	20	1.2
COD	100	
Suspended Solids	30	
pH	6-9 pH units	
Temperature	20°C	
ADDITIONAL PARAMETERS *(if required)*		
Toxicity*	5 TU	
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	

* Toxicity Units (TU) are defined as: TU= (100/x Hour EC50) where x is the relevant period of exposure and EC50 is expressed as %vol/vol.
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

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 flow, 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.

Control of Emissions to Sewer

Description of treatment: Flocculation and settlement

Control Parameter	Monitoring	Key Equipment Note 1
Suspended solids & BOD	Effluent Suspended solids/BOD	Chemical Dosing & Sand Filtration
Effluent pH adjustment	pH in Flocculation Tank	Dosing pumps, agitators
Effluent Transfer	Effluent Flow	Pumps
Sludge dewatering	Filtrate Suspended Solids	Sludge Pumps

Description of treatment: Removal of Fats, Oil and Grease generated as a result of any canteen activities

Control Parameter	Monitoring	Key Equipment Note 1
Fats, oil and grease removal	Fats, oil and grease content in trade effluent as a result of canteen activities	Grease removal equipment

Note 1: Grease removal equipment shall comply with the requirements of European Standards (EN) or Plumbing and Drainage Institute (PDI) standards or as otherwise specified by Irish Water.

Signed on behalf of Irish Water

Date 18/7/17