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18th July 2017

Dear Jennifer,

RE: Discharge to Sewer for P0096-03 Saint Gobain Performance Plastics Ireland

Irish Water wishes to advise the Agency that it has reviewed the conditions to be set for discharges to sewer for the Saint Gobain Performance Plastics Ireland Licence Application.

Following the review Irish Water wishes to retract the Consent for discharge to sewer that was submitted to the Agency on the 17 May 2017.

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.

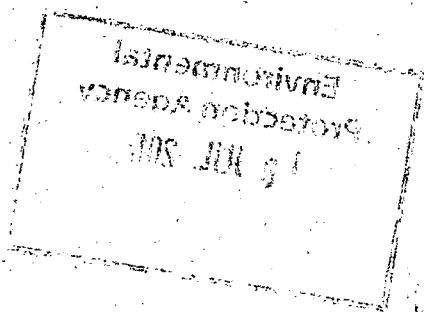
Yours sincerely


Michael O'Leary

Acting Head of Environmental Regulation

Environmental
Protection Agency
18 JUL 2017

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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: Saint Gobain Performance Plastics Ireland
Reg. No: P0096-03

Location Address: Kilrush Co. Clare

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: 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	Yes
2. Monitoring and analysis equipment shall be installed, operated and maintained as necessary, so that all monitoring, accurately reflects the emission/discharge.	Yes	Yes
3. The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out below and as in accordance with <i>Schedule C: Control & Monitoring</i> , 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	Yes
4. The licensee shall ensure that any trade effluent generated from cleaning activities shall pass through appropriate grease removal equipment prior to discharge to sewer.	Yes	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 new licence 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	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 <i>Schedule B: Emission Limits to Sewer and Schedule C: Control & Monitoring</i> , 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	No	

<p>an evaluation of practicable options, for energy and resource efficiency, the use of 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.</p>	
<p>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.</p>	<p>Yes</p>
<p>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:</p> <ul style="list-style-type: none"> (i) Silt traps to ensure that all storm water discharges, other than from roofs, from the (ii) Facility pass through a silt trap in advance of discharge; (iii) 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>> (iv) The silt traps and separator shall be in accordance with I.S. EN-858-2: 2003 (separator systems for light liquids). 	<p>No</p>
<p>10. The licensee shall conclude an end user agreement with Irish Water.</p>	<p>Yes</p>
<p>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.</p>	<p>Yes</p>
<p>12. No alteration to, or reconstruction in respect of, the activity, or any part thereof, that would, or is likely to, result in</p> <ul style="list-style-type: none"> (i) a material change or increase in: <ul style="list-style-type: none"> ▪ 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: <ul style="list-style-type: none"> ▪ site management, infrastructure or control with adverse environmental significance; <p>shall be carried out or commenced without prior notice to, and without the approval of, the Agency and/or Irish Water as appropriate.</p>	<p>Yes</p>

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."

Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Emission point reference no: SE1

Emission to (sewer description): East of site near PTFE production building (E099837, E156035)

Volume to be emitted: Maximum in any one day: 20 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	1,500	40
COD	8,000	100
Suspended Solids	500	5
pH	6-9 pH units	
Temperature	35°C	
ADDITIONAL PARAMETERS (if required)		
Toxicity*	10 TU	
FOG	100	2
Total Phosphorus	10	0.2
Total Nitrogen	50	1
Detergents (as MBAS)	10	2
Sulphate	800	16
Chloride	1,000	20

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

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. <i>(Specify, as required)</i>

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Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission point reference no: SE1

Parameter (delete parameters which are not applicable)	Monitoring Frequency (e.g. monthly, quarterly, annually) <small>Note 1 & 2</small>	Sample Type (grab, composite)
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	Monthly	Standard Method
COD	Weekly	Standard Method
Total Suspended Solids	Monthly	Standard Method
ADDITIONAL PARAMETERS (if required)		
FOG	Quarterly	Standard Method
Total Nitrogen	Quarterly	Standard Method
Sulphate	Quarterly	Standard Method
Detergents (as MBAS)	Quarterly	Standard Method
Chloride	Quarterly	Standard Method
Organic Solvents	Annually	Standard Method
Respirometry	Annually	Standard Method
Toxicity	As may be required	Standard Method
Priority Substances	As may be required	Standard Method

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:

Removal of suspended solids and mineral oils.

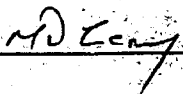
Control Parameter	Monitoring	Key Equipment ^{Note 1}
Sludge Settlement	PTFE Sludge removal	Three Stage Settlement Tanks

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 19/2/17

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