



**Ms Noeleen Keavey,
Environmental Licensing Programme
Office of Environmental Sustainability
EPA Headquarters,
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Irish Water
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Reg No: P1060-01

09 May 2018

Dear Ms Keavey,

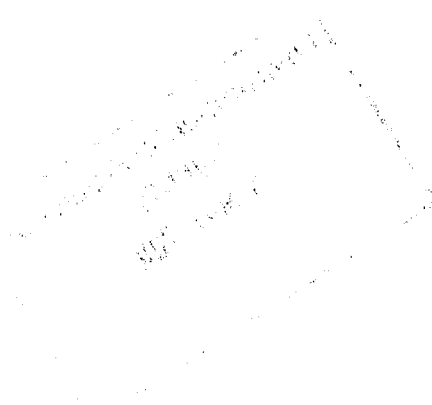
I refer to EPA correspondence dated 20th February 2018 regarding an application from Mallinckrodt Pharmaceuticals Ireland Limited for their facility located at College Business and Technology Park, Cruiserath Road, Blanchardstown, Dublin 15 for an Industrial Emissions licence.

Irish Water have assessed IE licence application P1060-01 and are satisfied to consent to the proposed discharge to sewer subject to the consent conditions attached.

If you have any further queries, please do not hesitate to contact Irish Water.

Yours sincerely

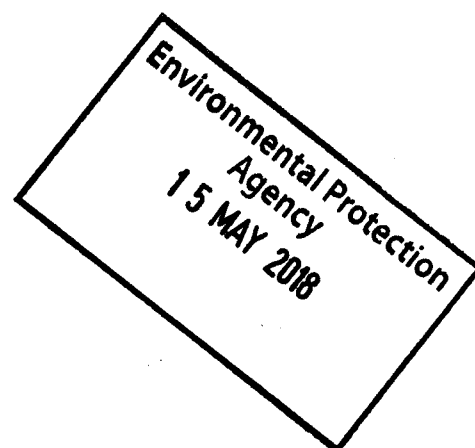
**Mark O' Callaghan
Authorised Signatory**



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IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1



Name of Facility: Mallinckrodt Pharmaceuticals Ireland Limited **Reg. No:** P1060-01

Location Address: College Business and Technology Park, Cruiserath Road,
Blanchardstown, Dublin 15, Dublin.

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

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 <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
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 maintain and implement 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 <i>Schedule B: Emission Limits to Sewer</i> and <i>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	No

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 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: <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; 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."

<p>ADDITIONAL GENERAL CONSENT CONDITIONS In respect of discharges or emissions to sewers, in accordance with Section 99E of the Environmental Protection Agency Act 1992, as amended. <i>(Specify, if required)</i></p>

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Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Emission Point Reference No.: **SE-1**

Emission to (*sewer description*): 707632E, 741278N

Volume of Trade effluent emitted:	Maximum in any one day:	95 m ³
	Maximum in any hour:	4 m ³

Parameter	Emission Limit Values	
pH	6-9 pH Units	
Temperature	35°C	
	Daily Concentration (mg/l)	Daily Load (kg/day)
BOD	2,000	50
COD	3,000	75
Suspended Solids	250	6.25
Total Phosphorus (as P)	200	5
Total Nitrogen (as N)	200	5
Chloride	1,000	25
Sulphate	800	20
Detergents (as MBAS)	100	2.5
Total Heavy Metals	1	0.025
Cadmium	0.05	0.001
Chromium	0.5	0.013
Copper	0.5	0.013
Lead	0.05	0.001
Zinc	0.5	0.013
Nickel	0.5	0.013
Mercury	0.001	0.00003
Silver	0.5	0.013

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission Point Reference No.:

SE1

Parameter	Monitoring Frequency (Note 1)	Analysis Method/Technique
Flow to sewer	Continuous	Flow meter & recorder
Temperature	Continuous	Temperature Probe & recorder
pH	Continuous	pH meter & recorder
TOC	Continuous	TOC meter & recorder
Conductivity	Continuous	Conductivity meter & recorder
Chemical Oxygen Demand	Monthly	Standard Method
Biochemical Oxygen Demand	Monthly	Standard Method
Suspended Solids	Monthly	Standard Method
Total Phosphorus (as P)	Monthly	Standard Method
Total Nitrogen (as N)	Monthly	Standard Method
Chloride	Monthly	Standard Method
Sulphate	Monthly	Standard Method
Detergents (As MBAS)	Monthly	Standard Method
Full Metal Suite	Monthly	Standard Method
Fats, Oils and Greases (FOG)	Monthly	Standard Methods
Organic Solvents (VOCs & SVOCs)	Quarterly	Standard Methods
Respirometry	As requested	Standard Methods
Active Pharmaceuticals	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.

Control of Emissions to Sewer

Description of treatment: Treatment/Abatement control

Control Parameter	Monitoring	Key Equipment
pH	Continuous Monitoring	pH Probe with recorder 2 No. external Lean Waste Storage & Neutralisation Tanks Nitric Acid / Caustic Dosing system
Temperature	Continuous Monitoring	Temperature Probe with recorder
Flow	Continuous Monitoring	Flow Meter with recorder.
TOC	Continuous Monitoring	TOC Meter with recorder
Conductivity	Continuous Monitoring	Conductivity Probe with recorder

Signed on behalf of



Date

9/5/18

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