

Noeleen Keavey

From: Katrina Browne <kabrowne@water.ie>
Sent: 01 June 2018 15:10
To: Noeleen Keavey
Cc: Sean O'Donoghue; Irish Water - Section 99
Subject: IW_S99E_Response_Crag Digital Limited_P1077-01
Attachments: IW S99E Response_Crag Digital Limited_P1077-01_310518.pdf

Dear Ms. Keavey,

Please find attached Irish Water's response regarding an application from Crag Digital Limited for an Industrial Emissions Licence.

A hard copy has been issued by post.

Kind regards,

Katrina Browne
Environmental Policy and Licensing Specialist

Uisce Éireann

Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath, Éire
Irish Water
Colvill House, 24-26 Talbot Street, Dublin, Ireland

Direct Line: +353 (0)1 8925175

Email: kabrowne@water.ie

www.water.ie



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Thank you for your attention.

Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimisceithe agus féadfar é a bheith neamhdhleathach. Níl Líonraí Uisce Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Líonraí Uisce Éireann le haon dliteanas faoi ghnímh nó faoi iarmhairtí bunaithe ar úsáid thoirmisceithe na faisnéise seo. Níl Líonraí Uisce Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scríos an t-ábhar ó gach aon ríomhaire. Féadfar ríomhphost a bheith soghabhálach i leith truaillithe, idircheaptha agus i leith leasaithe neamhúdaraíthe. Ní ghlacann Líonraí Uisce Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar theachtairreachtaí chuig nó ó Líonraí Uisce Éireann chun comhlíonadh le polasaithe agus le caighdeáin Líonraí Uisce Éireann a chinntiú agus chun ár ngnó a chosaint. Fochuideachta gníomhaíochta de chuid Ervia is ea Uisce Éireann atá faoi theorainn scaireanna, de bhun fhorálacha an tAcht um Sheirbhísí Uisce 2013, a bhfuil a bpríomh ionad gnó ag 24-26 Teach Colvill, Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.

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Ms. Noeleen Keavey
Environmental Licensing Programme,
Office of Environmental Sustainability,
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Reg No: P1066-01

31 May 2018

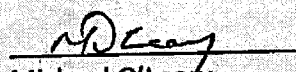
Dear Ms Keavey,

I refer to your correspondence dated 20th December 2017 relating to an application from Crag Digital Limited, Crag Avenue, Clondalkin, Dublin 22 for an Industrial Emissions licence.

Please find attached Irish Water's consent to discharge to sewer subject to the consent conditions attached.

If you have any further queries please do not hesitate to contact us.

Yours sincerely


Michael O'Leary,
Authorised Signatory

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IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: Crag Digital Limited

Reg. No: P1066-01

Location Address: Crag Avenue
Clondalkin
Dublin 22

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

<p>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.</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>	Yes
<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: (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).</p>	Yes
<p>10. The licensee shall conclude an end user agreement with Irish Water.</p>	Yes
<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>	Yes
<p>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.</p>	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 In respect of discharges or emissions to sewers, in accordance with Section 99E of the Environmental Protection Agency Act 1992, as amended. (Specify, if required)

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Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Emission Point Reference No.: S 1

Emission to (sewer description): Clondalkin Industrial Estate

Volume of Trade effluent emitted: Maximum in any one day: 33.6 m³
 Maximum in any hour: 1.4 m³

Parameter	Emission Limit Values	
	6-9 pH Units	
Temperature	42°C	
	Daily Concentration (mg/l)	Daily Load (kg/day)
BOD	25	0.84
COD	100	3.36
Suspended Solids	35	1.176
Nitrates (as N)	10	0.336
Ammonia (as N)	5	0.168
Chloride	350	11.76
Total Phosphorus (as P)	2	0.0672
Mineral Oils	20	0.672

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission Point Reference No.: S-1

Parameter	Monitoring Frequency (Note 1 +2)	Analysis Method/Technique
Flow to sewer	Continuous	Flow meter
Temperature	Continuous	Temperature Probe
pH	Continuous	pH meter
BOD	Quarterly	Standard Methods
COD	Quarterly	Standard Methods
Suspended Solids	Quarterly	Standard Methods
Nitrates (as N)	Quarterly	Standard Methods
Ammonia (as N)	Quarterly	Standard Methods
Chloride	Quarterly	Standard Methods
Total Phosphorus (as P)	Quarterly	Standard Methods
Mineral Oils	Quarterly	Standard Methods
Full Metal Suite	Annually	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.

Control of Emissions to Sewer

Description of treatment: pH control

Control Parameter	Monitoring	Key Equipment
pH	Continuous Monitoring	Continuous monitoring and pH control dosing

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

M. O'Leary

Date

1/6/18

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