



Ms Noeleen Keavey
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13 February 2017

Ref.: Enva Ireland Limited – **WO184-02**- Comments in relation to objection to Irish Water conditions attached to consent to discharge to sewer under Section 99E of the EPA Act, as amended.

Dear Ms Keavey,

Please find below Irish Water's comments in relation to the objection item raised by Enva Ireland Limited in accordance with article 26 of the Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013. In making comment, Irish Water refer to the objection item raised by Enva Ireland Limited in correspondence dated 11th January 2017 and respond accordingly;

Objection Item: "Schedule B 3 Emissions to Sewer" Proposed Determination incorrectly based on Schedule C.4 of the original licence WO184-02

Owing to the objection item above, Irish Water is satisfied to amend the Section 99E response made to the Agency dated 22nd November 2016. Please find the amended Section 99E response overleaf.

Yours sincerely,

Michael O'Leary

Authorised Signatory

Asset Strategy

Irish Water

IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: Enva Ireland Limited

Reg. No: W0184-02

Location Address: Clonminam Industrial Estate, Portlaoise, County Laois

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

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. The Licensee shall at no time discharge or permit the discharge into the sewer of any liquid matter or thing which;
 - I. would constitute a danger to sewer maintenance personnel working in the wastewater network or wastewater treatment plant;
 - II. cannot be appropriately treated at the downstream wastewater treatment plant;
 - III. would be liable to render wastewater sludge generated at the downstream wastewater treatment plant unsuitable for disposal to agricultural lands or other approved disposal routes;
 - IV. would be liable to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer;
 - V. would be liable to cause the liberation of by-products detrimental to either the wastewater network or wastewater treatment plant;
 - VI. would be liable to cause impairment of the receiving environment and ecosystem to which the wastewater treatment plant discharges;
 - VII. would be liable to give rise to flammable or explosive vapours in the receiving wastewater network;
 - VIII. would be liable to cause the release of nuisance odours from the wastewater network either directly or indirectly following mixing with other wastewater within the network; or,
 - IX. would be liable to cause a blockage in the wastewater network or set, or congeal, at average sewer temperature.

3. No specified emission to sewer shall exceed the emission limit values set out in

Schedule B : Emission Limits to Sewer
<p>4. 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.</p>
<p>5. 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>
<p>6. All trade effluent arising from the facility shall be collected and discharged to Irish Water's foul sewer as indicated on drawings and maps which accompanied this licence review application.</p>
<p>7. The licensee shall notify Irish Water and the Local Authority 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.</p>
<p>8. Monitoring and analyses equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge to sewer.</p>
<p>9. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.</p>
<p>10. The Licensee shall ensure that any trade effluent generated as a result of kitchen/canteen activities with the potential to contain fats, oils and grease (FOG) pass through grease removal equipment before entry to the public sewer.</p> <p>Grease removal equipment employed shall meet the following specifications;</p> <ul style="list-style-type: none"> - Passive grease separators must comply with the requirements of I.S. EN 1825: Parts 1 & 2 - Grease removal units must comply with the requirements of the US Plumbing and Drainage Institute (PDI) G101 guidelines.
<p>11. Within 3 months of the date of grant of this Licence, the Licensee shall submit specifications of the proposed or existing grease removal equipment and evidence, including calculations, demonstrating that the size of equipment is in accordance with Condition 10. This submission shall be sent to Irish Water via TER@water.ie (TER = Trade Effluent Returns) and the Local Authority.</p>
<p>12. The Licensee shall maintain any grease removal equipment so as to meet the requirements set out in Schedule B and in any case, at least in accordance with the manufacturer's specifications or industry best practice guidelines or as per additional maintenance or servicing requirements requested in writing by Irish Water based on operational experience.</p>
<p>13. Waste FOG shall only be disposed of through an appropriately permitted waste removal contractor. The Licensee shall obtain and keep onsite disposal certificate records outlining:</p> <ul style="list-style-type: none"> a) Name and address of Licensee b) Name and address of waste contractor c) Vehicle Registration Number of waste contractor's vehicle d) Waste Permit Number

- e) Quantity of Fats, Oil and Grease (FOG) collected by the waste contractor
- f) Name and address of facility used for the disposal of the FOG
- g) The disposal certificate shall have a unique reference number

14. "Best Management Practices" (BMP) in FOG management shall be employed by the Licensee. The Licensee shall train all relevant staff in BMP and continually monitor operations within their facility to ensure that BMP are being carried out at all times.

15. The use of additives (microbial, enzymatic, biological or chemical) in conjunction with passive grease separators or grease removal units for the treatment of fats oils and grease (FOG) which emulsify FOG is not acceptable. It is the responsibility of the Licensee to ensure any additives used are non-emulsifying.
It is also the responsibility of the Licensee to ensure additives are biodegradable, classed as non hazardous, free of enzymes and suitable for use in food areas.

16. The use of food macerators, food grinders or other purpose built mechanical devices to shred or hydrate or otherwise alter the structure of food waste for the purposes of facilitating its discharge to the sewerage system is not permitted.

17. The Licensee shall avoid the use of non-biodegradable cleaning agents/detergents. Where this is not possible, Best Available Techniques (BAT) shall be employed to substitute or minimise their discharge to sewer and receiving environment to which the wastewater treatment plant discharges.

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 and treatment plant maintenance personnel;
- II. the general integrity of the wastewater network;
- III. the operations of the downstream wastewater treatment plant; and
- IV. wastewater sludge generated at the downstream wastewater treatment plant.

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 the **Local Authority Contact & 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 or treatment plant;
- III. would be injurious to the construction of the wastewater network or treatment plant;
- IV. would interfere with the operations of the downstream wastewater treatment plant and supporting infrastructure; or
- V. would render wastewater sludge generated at the downstream wastewater treatment plant unsuitable for disposal to agricultural lands or other approved disposal routes.

22. Non-trade effluent wastewater (e.g. firewater, accidental spillages) which occurs on site shall not be discharged to the sewer without the prior authorisation of Irish Water.

23. The Licensee shall maintain or have maintained any on-site effluent treatment systems.

24. If requested in writing by Irish Water, the final trade effluent generated onsite shall pass through appropriately sized screening before discharge to sewer so as to remove gross solids and prevent their entry to the public sewer. The screening apparatus shall be located upstream of the final trade effluent sampling point.

25. Best available technology (BAT) shall be used to prevent, minimise, manage and treat pollutants in the wastewater discharge to sewer.

26. A fee shall be payable to Irish Water by the Licensee for any required compliance monitoring outside of scheduled EPA monitoring. This charge covers the cost of sample collection by the Irish Water representative and chemical analysis. Payment is to be made on demand.

27. 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, treating and disposing of discharges of trade effluent, sewage effluent or other matter to sewer. Payment to be made on demand.

Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Emission Point Reference No.: FS 1

Volume to be emitted ^{Note 1}: Maximum in any one day: 50 m³
 Maximum rate per hour (m³): 10 m³

Hours of Discharge: 2300 to 0600 ^{Note 1}

Parameter	Emission Limit Value	
	Concentration (mg/l)	Daily Load (kg/day)
pH	6 – 9	
Temperature	Monthly Mean: 35 °C Daily Maximum: 43 °C	
Toxicity	10 TU	
COD	6,000	280
Suspended Solids	400	20
Sulphate (as SO ₄)	800	40
Chloride	6,000	300
Fats, Oils and Grease	100	5
Total Phosphorus	150	7.5
Total Nitrogen	125	
Ammonia	80	4
Phenols	30	1.5
Copper	0.5	0.025
Zinc	0.5	0.025
Lead	0.5	0.025
Cadmium	0.005	0.00025

Note 1: Unless otherwise agreed in writing with Irish Water and the Agency under exceptional circumstances.

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission Point Reference No.:

FS 1

Parameter	Monitoring Frequency (Note 1 &2)	Analysis Method/Technique
Flow to sewer	Continuous	Flow meter
pH	Continuous	pH meter
Temperature	Continuous	Temperature Probe
Chemical Oxygen Demand	Daily	Standard Methods
Suspended solids	Daily	Standard Methods
Ammonia	Daily	Standard Methods
Sulphates	Weekly	Standard Methods
Chloride	Weekly	Standard Methods
Total Phosphorus	Weekly	Standard Methods
Phenols	Weekly	Standard Methods
Copper	Weekly	Atomic Absorbtion / ICP
Zinc	Weekly	Atomic Absorbtion / ICP
Lead	Weekly	Atomic Absorbtion / ICP
Cadmium	Weekly	Atomic Absorbtion / ICP
Fats, Oil & Grease	Weekly	Standard Methods
Total Nitrogen	Weekly	Standard Methods
Full metals Screen	Quarterly	ICP
Priority Substances	As requested	Standard Methods
Toxicity	As requested	Standard Methods
Respirometry	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.