

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

Uisce Éireann
Teach Colvill
24-26 Sráid Thalbóid
Baile Átha Cliath 1
Éire

Irish Water
Colvill House
24-26 Talbot Street
Dublin 1
Ireland

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

Reg No: P1018-01

21st December 2015

Dear Noeleen,

I refer to your letter dated 4th November 2015 regarding an application from Little Island BioEnergy Limited, Inchera, Little Island, Cork 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 query please do not hesitate to contact us.

Yours sincerely



Mark O Callaghan,
Authorised Signatory

IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: Little Island Bioenergy Limited

Reg. No: P1018-01

Location Address: Inchera, Little Island, Cork.

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

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 process effluent and to take samples of the process effluent.
2. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing that is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid, alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer.
3. The licensee shall at no time discharge or permit to be discharged into the sewerage system any matter or thing that is capable of presenting any risk to Agency or Irish Water staff or its agents fulfilling any of their duties or causes nuisance odours to arise from the sewer network.
4. The licensee shall ensure that trade effluent is balanced and stored in an open tank prior to its discharge to sewer at a controlled and steady rate. If necessary, the stored trade effluent shall be pre-treated to remove any odour which could cause nuisance from a public sewer. The licensee shall submit plans, schematics and written procedures for the management of trade effluent discharges to Irish Water at least one month prior to first discharge.
5. Prior to the commencement of the licensed discharge, the applicant shall submit for the written agreement of Irish Water, details of the methodology to stop the discharge to the sewer in the event of an emergency or if breaches of the licence conditions are detected.
6. No substances shall be discharged to sewer which cannot be appropriately treated at the downstream wastewater treatment plant and/or would be detrimental to the receiving environment and ecosystem to which the wastewater treatment plant

discharges to.
7. No specified emission to sewer shall exceed the emission limit value or load set out in Schedule B : Emission Limits to Sewer
8. All trade effluent arising from the named premises as per above shall be collected and discharged to Irish Water's foul sewer as indicated on submitted plans and particulars and in accordance with the environmental statement which accompanied the licence application.
9. 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.
10. Only trade effluent wastewater which is generated within the site boundary as a result of licensed activities shall be permitted to be discharged to the public sewer.
11. The vehicle wash system discharge shall pass through a grit trap and appropriately sized interceptor prior to discharge to the foul sewer.
12. Trade effluent from onsite canteen/kitchen facilities containing fats, oils and grease (FOG) shall pass through grease removal equipment before entry to the public sewer. Grease removal equipment employed shall meet the following specifications; - 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.
13. The licensee shall provide to Irish Water plans and details in formats outlined below within 6 months of the date of the commencement of licensed activities. These shall include; <ul style="list-style-type: none"> ➤ Location of pipes and sewers, manholes, storage tanks, effluent treatment systems. ➤ Diameter, material, upstream invert level, downstream invert level, condition for all sewers on site. ➤ Cover level, invert level, chamber dimensions for each manhole on site. ➤ Details of effluent treatment systems, including dimensions. ➤ The condition of all sewers and manholes. ➤ Plans and details of the discharge point to the Irish Water sewer. ➤ Location and invert level of the discharge point or chamber. ➤ Details of the discharge chamber including internal dimensions, type of construction, incoming and outgoing pipe diameter, incoming and outgoing pipe material, internal features or devices such as flow control and backdrops. ➤ The Plan drawings and relevant information shall be provided in ESRI SHP File or AutoCAD DWG format with attributes geo-coordinated to Irish National Grid or Irish Transverse Mercator. All Levels shall be to Malin Head OD. The adopted coordinate system shall be clearly identified.
14. Monitoring and analyses equipment shall be operated and maintained as necessary

so that monitoring accurately reflects the emission or discharge.
15. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.
16. The licensee shall install an on-online flow measurement device to accurately record the volume and rate of effluent discharged to sewer.
17. No emission to sewer shall take place which gives rise to any reaction within the sewer or to the liberation of by-products which may be of environmental significance.
18. The licensee shall ensure that the effluent shall not contain petroleum hydrocarbons or organic solvents (including chlorinated organic solvents) which would give rise to flammable or explosive vapours in the sewer.
19. The licensee shall notify Irish Water and the Water Services Section of Cork County Council along with the Agency in advance of any changes which may result in a change in the nature, characteristics or volume of the treated wastewater.
20. A summary report of results of analysis of effluent discharged to the sewer with relevant volumes shall be forwarded on a monthly basis to both : Cork County Council & Irish Water: TER@water.ie (TER = Trade Effluent Returns)
21. In the event of any incident which relates to discharge to sewer, having taken place, the licensee shall notify, by telephone and e-mail, the Agency along with both: Cork County Council & Irish Water: TER@water.ie (TER= Trade Effluent Returns) Phone Number: 1890 278 278 An incident shall be considered to be any discharge which is in breach of emission limits to sewer and/or would constitute a danger to sewer maintenance personnel working in the sewerage system or would be injurious to the construction of the sewer or would interfere with the operations of the downstream wastewater treatment works and supporting infrastructure.
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 the on-site effluent treatment systems.
24. Best available technology (BAT) shall be used to prevent, minimise, manage and treat pollutants in the wastewater discharge to sewer
25. 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.
26. The licensee shall pay to Irish Water a charge in respect of the reception and treatment of the trade effluent discharged to the foul sewer. The charges associated

with the Trade effluent discharge will be in accordance with the Local Authorities current charging regime and will remain in place until a Non-Domestic tariff structure has been approved by the Commission for Energy Regulation (CER) and implemented by Irish Water. These charges will be billed for by Cork County Council until further notice.

Payment to be made on demand.

For inspection purposes only.
Consent of copyright owner required for any other use.

Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Emission Point Reference No.: **SE 1 (to be established)**

Emission to **(sewer description)**:

Volume of Trade effluent emitted:	Maximum in any one day:	200 m ³
	Maximum in any hour:	8.3 m ³

Parameter	Emission Limit Values	
pH	6-8 pH Units	
Temperature	35°C	
	Daily Concentration (mg/l) ^{Note 1}	Daily Load (kg/day)
BOD	200	40
COD	600	120
Suspended Solids	100	20
Ammonia (as N)	250	50
Total Phosphorus	200	20
Sulphate	300	60
Sulphides	5	-
Chloride	1,000	-
Detergents (anionic, cationic & non-ionic))	5	-
Fats, Oils Grease	100	-
Diesel Range Organics	1	-
Petrol Range Organics	1	-

Note 1.

All samples excluding those for pH and temperature shall be collected on a 24 hour flow proportional composite sampling basis.

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission Point Reference No.:

SE-1

Parameter	Monitoring Frequency (Note 1 &3)	Analysis Method/Technique
Flow to sewer	Continuous	On-line continuous Flow meter with recorder
pH	Continuous	On-line continuous pH Probe and recorder
Temperature	Continuous	On-line continuous Temperature probe with recorder
COD	Weekly	Standard Methods
BOD	Monthly	Standard Methods
Suspended Solids	Monthly	Standard Methods
Total Nitrogen	Monthly	Standard Methods
Ammonia (as N)	Weekly	Standard Methods
Total Phosphorus	Monthly	Standard Methods
Chloride	Biannually	Standard Methods
Sulphate	Monthly	Standard Methods
Total Heavy Metals	Annually	Standard Methods
Volatile Organic Compounds ^{Note 2}	Annually	Standard Methods
Oils, Fats & Greases	Biannually	Standard Methods
Detergents (as MBAS)	Biannually	Standard Methods
Diesel Range Organics	Biannually	Standard Methods
Petrol Range Organics	Biannually	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.

As per US EPA method 524.2 compound list.

Note 3.

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.