



**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
D01 WA07
Éire

Irish Water
PO Box 6000
Dublin 1
D01 WA07
Ireland

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

Reg No: W0304-01

03 April 2020


Dear Sir/Madam,

I refer to EPA correspondence dated 24 February 2020 regarding an application from Packaging Laundry Limited for a facility located at Unit C4, Oldcourt Industrial Estate, Boghall Road, Bray, County Wicklow for a Waste licence.

Irish Water have assessed IE licence application W0304-01 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

DocuSigned by:

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Andrew Cartwright
Authorised Signatory

IRISH WATER RESPONSE

Irish Water
 Colvill House
 24/26 Talbot Street
 Dublin 1

Name of Facility: Packaging Laundry Limited **Reg. No:** W0304-01

Location Address: Unit C4, Oldcourt Industrial Estate, Boghall Road , Bray , Wicklow,
 A98 P6N3

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

Consent: Indicate Yes to one of the following statements:

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. No specified emission from the installation shall exceed the emission limit values set out in Schedule B: Emission Limits, of this licence. There shall be no other emissions of environmental significance.	Yes
3. Monitoring and analysis equipment shall be installed, operated and maintained as necessary, so that all monitoring accurately reflects the emission/discharge.	Yes
4. 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.	Yes

<p>(i) Sampling and analysis shall be undertaken by competent staff in accordance with documented operating procedures.</p> <p>(ii) Such procedures shall be subject to a programme of Analytical Quality Control using appropriate control standards with evaluation of test responses.</p> <p>(iii) Where any analysis is sub-contracted it shall be outsourced to a competent laboratory.</p>	
<p>5. The licensee shall ensure that any trade effluent generated from any canteen activities shall pass through appropriate grease removal equipment prior to discharge to sewer.</p>	Yes
<p>6. 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 the Agency.</p>	Yes
<p>7. 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.</p>	Yes
<p>8. 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 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, <u>reduction and diversion of storm water runoff to sewer</u>. 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>	No
<p>9. 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>10. 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> <p>(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;</p> <p>(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>></p> <p>(iii) The silt traps and separator shall be in accordance with I.S. EN-858-2: 2003 (separator systems for light liquids).</p>	No
<p>11. The licensee shall conclude an end user agreement with Irish Water.</p>	Yes
<p>12. 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</p>	Yes

<p>the manner prescribed by Irish Water, as soon as practicable after such an incident.</p>	
<p>13. No alteration to, or reconstruction in respect of, the activity, or any part thereof, that would, or is likely to, result in</p> <p>(i) a material change or increase in:</p> <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 <p>(ii) any changes in:</p> <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>
<p>14. The licensee shall as necessary undertake a screening of the final trade effluent emission for relevant priority substances and certain other pollutants as listed in Annex I, II & III of Directive 2008/105/EC and for relevant Watchlist substances listed in Annex to CID (EU) 2018/840 which may be present in the trade effluent as a result of onsite activities.</p> <p>The licensee shall ensure that where substances identified as part of the screening, each are assessed against potential risks posed to the biological processes at the receiving wastewater treatment plant and potential risks to the receiving environment in terms of applicable environmental quality standards (EQS).</p> <p>The licensee shall submit a report to the Agency on the findings within a time-scale specified by the Agency.</p>	<p>Yes</p>

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Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Emission point reference no: **SE1**

Emission to: **IW Sewer at Boghall Rd., Bray, Co. Wicklow**

Volume to be emitted: Maximum in any one day: **5 m³**

Maximum rate per hour: **0.5 m³**

Parameter	Emission Limit Values		
pH	6-10 pH Units		
Temperature	42°C		
	Concentration (mg/l)	Concentration (24 Hr. Composite Sample) (mg/l)	Load (kg/day)
BOD, 5 days with Inhibition (Carbonaceous BOD)	1,000	1,000	5
COD - Cr	3,000	3,000	15
Suspended Solids	1,000	1,000	5
Fats, Oils & Greases	100	100	0.5
Total Phosphorus (as P)	15	15	0.075
Ammonia-Total (as N)	20	20	0.1
Chloride	1,000	1,000	5
Sulphate	800	800	4
Total Heavy Metals	10	10	0.05
Anionic Surfactants / Detergents (MBAs)	100	100	0.5

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission point reference no: **SE1**

Parameter	Monitoring Frequency ^(Note 1)	Analysis Method / Technique
Flow Rate	Continuous	In line flow meter with recorder
Temperature	Continuous	Temperature probe with recorder
pH	Continuous	pH meter with recorder
BOD, 5 days with Inhibition (Carbonaceous BOD)	Quarterly	Standard Methods
COD-Cr	Quarterly	Standard Methods
Suspended Solids	Quarterly	Standard Methods
Fats, Oils & Greases	Quarterly	Standard Methods
Total Phosphorus (as P)	Quarterly	Standard Methods
Ammonia-Total (as N)	Quarterly	Standard Methods
Chloride	Quarterly	Standard Methods
Sulphate	Quarterly	Standard Methods
Total Heavy Metals	Quarterly	Standard Methods
Anionic surfactants / Detergents (MBAs)	Quarterly	Standard Methods
Metals & Organic Compounds (Note 2)	Biannually	Standard Methods
Toxicity	As Requested	Standard Methods
Respirometry	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.

Note 2: Priority substances and certain other pollutants as listed in Annex I, II & III of Directive 2008/105/EC and relevant Watchlist substances listed in Annex to CID (EU) 2018/840 which are likely through normal process operations to be present in the trade effluent. (List of parameters to be decided based on screening exercise as per consent Condition 14.)


Control of Emissions to Sewer

Control Parameter	Monitoring	Key Equipment
Flow Rate	Continuous	In line flow meter with recorder
Temperature	Continuous	Temperature probe with recorder
pH	Continuous	pH meter with recorder
FOG	Fats, oil and grease content in trade effluent as a result of canteen activities.	Grease removal equipment ^(Note 1) .

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.

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Authorised Signatory

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3/4/2020

Date _____