

From: [Aisling F Kehoe](#)
To: [Aisling F Kehoe](#)
Subject: FW: IW Section 99E Consent Response - P1073-02 EIMS:0680001239
Date: Wednesday 20 July 2022 09:32:00
Attachments: [image.png](#)
[EPA Cover Letter.pdf](#)
[P1073-02_MSD_Response_Consent.pdf](#)

From: WWSCl@water.ie <WWSCl@water.ie>
Sent: Tuesday 19 July 2022 14:31
To: Licensing Staff <licensing@epa.ie>
Cc: pricing <pricing@water.ie>; Katrina Browne <kabrowne@water.ie>; Irish Water - Section 99 <section99@water.ie>
Subject: IW Section 99E Consent Response - P1073-02 EIMS:0680001239

Dear Sir/Madam,

Please find attached the Section99e consent response for Msd International GmbH, Shire Piercetown, Dunboyne, Co Meath

Best Regards,

Irish Water Team

Uisce Éireann

Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86, Éire

Irish Water

Colvill House, 24-26 Talbot Street, Dublin 1, D01 NP86, Ireland

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limited by shares, is a subsidiary of Ervia, established pursuant to the Water Services Act 2013, having its principal place of business at Colvill House, 24-26 Talbot Street, Dublin 1.

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, toirimiscthe agus féadfar é a bheith neamhdhleathach. Níl 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 Uisce Éireann le haon dliteanas faoi ghnímh nó faoi iarmhairtí bunaithe ar úsáid thoirmiscthe na faisnéise seo. Níl 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 neamhúdaráithe. Ní ghlacann 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 theachtaireachtaí chuig nó ó Uisce Éireann chun comhlíonadh le polasaithe agus le caighdeáin 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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EPA Headquarters,
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Reg No: P1073-02

19/Jul/2022

Dear Sir/Madam,

I refer to your correspondence dated 17/Feb/2022 relating to an application from MSD Ireland (Dunboyne Biologics), Piercetown, Dunboyne, Co Meath, A86 HD21 for **Section 99E Consent Request**.

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

Wastewater Source Control & Licensing

IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: MSD International GmbH t/a MSD Ireland (Dunboyne Biologics) **Reg. No:** P1073-02

Location Address: Piercetown, Dunboyne, Co. Meath, A86 HD21

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

The sewer, to which this consent relates, is vested or controlled by Irish Water.	Yes
Does the consent constitute a material change with respect to the associated waste water discharge authorisation? ^{Note 2} (If 'Yes', you must attach to the consent a document describing the measures to be taken to bring about compliance with the waste water discharge authorisation including timeframes where appropriate.)	No

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 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.	No
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).	Yes
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
13. 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
14. The licensee shall undertake a desktop assessment and subsequent screening of trade effluent generated as a result of onsite activities for priority substances, priority hazardous substances and watchlist substances as listed in Tables 11,12 &	Yes

<p>13 of S.I. No. 272/2009 – EC Environmental Objectives (Surface Waters) Regulations 2009, as amended. A report on the assessment and screening shall be submitted to Irish Water within twelve months of the date of grant of this licence.</p> <p>The licensee shall ensure that where substances are identified as being present in the trade effluent, measures are taken to reduce, eliminate or phase out their emission as required and each are assessed against risks posed to the biological processes at the receiving Irish Water wastewater treatment plant (D0034-01) and the sludge generated at the plant. The licensee shall also ensure that identified substances are assessed against potential risks to public health and the whole aquatic environment. The environmental assessment shall specifically assess resultant concentrations of substances in the receiving environment against their applicable environmental quality standards (EQS) and environmental objectives established by S.I. No. 272/2009.</p> <p>Subsequent desktop assessments, screenings and reports shall be repeated at intervals commensurate with changes to the characteristics of the trade effluent as a result of changes to onsite processes/materials to be processed or as requested by Irish Water.</p>	
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<div>ADDITIONAL GENERAL CONSENT CONDITIONS</div> <div>In respect of discharges or emissions to sewers, in accordance with Section 99E of the Environmental Protection Agency Act 1992, as amended.</div> <div>(Specify, if required)</div>

Limit Values for Process Effluent to Sewer***Schedule B: Emission Limits***Emission Point Reference No.: **SE1**Emission to **(sewer description)**: Irish Water Sewer located at Piercetown

Volume of Trade effluent emitted:	Maximum in any one day:	461 m ³
	Maximum rate per hour:	20 m ³

Parameter	Emission Limit Values	
pH	6-10 pH Units	
Temperature	35°C	
Toxicity	10 TU	
	Concentration (24 Hr. Composite Sample (mg/l))	Max Daily Load (kg/day)
BOD, 5 days with inhibition (Carbonaceous BOD)	540	220
COD - Cr	800	300
Suspended Solids	400	220
Total Phosphorus (as P)	20	15
Total Nitrogen	200	110
Sulphate	500	385
Chloride	300	170
Fats, Oils and Grease	100	150
Anionic Surfactants/Detergents (as MBAs)	100	150

Frequency of Monitoring Process Effluent to Sewer***Schedule C***

Emission Point Reference No.: SE1

Parameter	Monitoring Frequency	Analysis Method/Technique
Flow Rate	Continuous	On-line flow meter with recorder
pH	Continuous	pH electrode/meter & recorder
Temperature	Continuous	On-line temperature probe with recorder
TOC	Continuous	On-line TOC meter with recorder
BOD, 5 days with inhibition (Carbonaceous BOD)	Monthly ^{Note 1}	Standard Method
COD - Cr	Weekly ^{Note 1}	Standard Method
Suspended Solids	Weekly ^{Note 1}	Standard Method
Fats, Oils & Greases	Quarterly ^{Note 1}	Standard Method
Total Nitrogen	Monthly ^{Note 1}	Standard Method
Total Phosphorus (as P)	Monthly ^{Note 1}	Standard Method
Sulphate	Monthly ^{Note 1}	Standard Method
Chloride	Monthly ^{Note 1}	Standard Method
Anionic Surfactants/Detergents (as MBAs)	Monthly ^{Note 1}	Standard Method
Metals & Organic Compounds ^{Note 2}	Annually	Standard Method
Active Pharmaceuticals	As Required	Standard Method
Toxicity ^{Note 3}	As Required	Standard Method
Respirometry	As Required	Standard Method

Note 1: All samples shall be collected on a 24 hour flow proportional composite sampling basis.

Note 2: Relevant Priority substances, Priority Hazardous substances and Watchlist substances (as per relevant Tables set out S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters) Regulations 2009 – 2019, as amended) in trade effluent generated as a result of onsite activities (The list of parameters to be analysed shall be based on the assessment/ screening as per consent Condition 14).

Note 3: The number of toxic units (Tu) = 100/x hour EC/LC50 in percentage vol/vol so that higher Tu values reflect grater levels of toxicity. For test regimes where species death is not easily detected, immobilisation is considered equivalent to death.

Control of Emissions to Sewer

Description of treatment: Wastewater Treatment

Control Parameter	Monitoring	Key Equipment ^{Note 1}
pH	Continuous	pH probe with recorder
		Neutralisation Tank (50m ³)
		Caustic and Acid Dosing Skid
Temperature	Continuous	Temperature probe with recorder
Flow	Continuous	Flow meter with recorder
Flow balancing	Continuous	Neutralisation Tank (50m ³)

Note 1: The licensee shall maintain appropriate access to standby and/or spares to ensure the operation of the abatement system.

Description of treatment: Removal of Fats, Oils and Grease generated as a result of any canteen activities

Control Parameter	Monitoring	Key Equipment ^{Note 1}
Fats, oils and grease removal	Fats, oils 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 mas otherwise specified by Irish Water.

Signed on behalf of

DocuSigned by:

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19/7/2022

Date _____