IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: **Forest Laboratories Ireland Limited** **Reg. No: P0306-04**

Location Address: **Forest Laboratories Ireland, Clonshaugh Industrial Estate, Dublin 17**

Recommendation granted subject to the consent conditions outlined below.	Yes
Recommendation granted without conditions.	N/A
Recommendation refused [Note 1].	N/A

The sewer, to which this consent relates, is vested or controlled by Irish Water.	No
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 *Schedule C: Control & Monitoring*, 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 *Schedule B: Emission Limits to Sewer* and *Schedule C: Control & Monitoring*, 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: ▪ 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: ▪ 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 <u>as appropriate</u>**.	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

	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. 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. 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.	

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)***

Limit Values for Process Effluent to IDA Drain

Schedule B: Emission Limits

Emission Point Reference No.: **SE1**

Emission to ***(drain description):*** Estate Roadway in Clonshaugh Industrial Estate

Volume of Trade effluent emitted: Maximum in any one day: 200 m^3
Average in any one day (on monthly basis): 120 m^3

Parameter	**Emission Limit Values**	
pH	6-10 pH Units	
Temperature	42°C	
	Concentration (24 Hr. Composite Sample (mg/l)	**Max Daily Load (kg/day)**
BOD, 5 days with inhibition (Carbonaceous BOD)	250	50
COD - Cr	1000	200
Suspended Solids	500	100
Fats, Oils and Grease	100	20
Phosphates (as PO4-P)	50	10
Sulphate (as SO4)	200	40

Frequency of Monitoring Process Effluent to IDA Drain

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
BOD, 5 days with inhibition (Carbonaceous BOD)	Monthly Note 1	Standard Method
COD - Cr	Monthly Note 1	Standard Method
Suspended Solids	Monthly Note 1	Standard Method
Fats, Oils & Greases	Monthly Note 1	Standard Method
Total Nitrogen	Monthly Note 1	Standard Method
Total Phosphorus (as P)	Monthly Note 1	Standard Method
Phosphates (as PO4-P)	Monthly Note 1	Standard Method
Sulphate (as SO4)	Monthly Note 1	Standard Method
Volatile Organic Compounds Note 2	Annually	Standard Method
Semi-volatile Organic Compounds – SVOC – (Total) Note 2	Annually	Standard Method
Toxicity Note 3	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 IDA Drain

Description of treatment: Primary Treatment

Control Parameter	Monitoring	Key Equipment Note 1
Effluent (pH) Neutralisation	pH output from neutralisation tank	Caustic Dosing Pump
		Agitator
Effluent Transfer		Lift Pumps
Effluent Balancing		Agitator
		Feed-forward Pump

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

Signed on behalf of

DocuSigned by:
Ronan Conally
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Date 8/11/2022