

From: [Licensing Staff](#)
To: [Aisling F Kehoe](#)
Subject: FW: Uisce Éireann Section 99E Consent Response - P0476-03 EIMS:0680001425
Date: Thursday 5 January 2023 14:47:45
Attachments: [image.png](#)
[P0476-03_Recordati_Response_Consent.pdf](#)
[EPA Cover Letter.pdf](#)

Kind Regards,
Aisling Kehoe
ELP Wexford.

From: WWSCL@water.ie <WWSCL@water.ie>
Sent: Thursday 5 January 2023 14:21
To: Licensing Staff <licensing@epa.ie>
Cc: pricing <pricing@water.ie>; Paddy O'Dwyer <paddy.odwyer@water.ie>
Subject: Uisce Éireann Section 99E Consent Response - P0476-03 EIMS:0680001425

Dear Sir/Madam,

Please find attached the Section 99e consent response for Recordati Ireland Limited, Raheens East Ringaskiddy Co. Cork.

Best Regards,
Andrew England



Uisce Éireann 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

Phone : [1850 278 278](tel:1850278278)

Email: WWSCL@water.ie

www.water.ie

[@IrishWater](#)

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, commercially sensitive and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited and may be unlawful. Irish Water accepts no liability for actions or effects based on the prohibited usage of this information. Irish Water is neither liable for the proper and complete transmission of the information contained in this communication nor for any delay in its receipt. If you received this in error, please contact the sender and delete the material from any computer. E-Mail may be

susceptible to data corruption, interception and unauthorised amendment. Irish Water accepts no responsibility for changes to or interception of this e-mail after it was sent or for any damage to the recipients systems or data caused by this message or its attachments. Please also note that messages to or from Irish Water may be monitored to ensure compliance with Irish Water's policies and standards and to protect our business. Irish Water, a designated activity company 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 truailithe, idircheaptha agus i leith leasaithe neamhúdairithe. 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 theachtairreachtaí 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.



Environmental Licensing Programme,
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

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

Reg No: P0476-03

Dear Sir/Madam,

I refer to your correspondence dated 20/July/2022 relating to an application from Recordari Ireland Ltd, Raheens East, Ringaskiddy Co. Cork for **Section 99E Consent Request**.

Please find attached Uisce Éireann'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

UISCE ÉIREANN RESPONSE

Uisce Éireann
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: Recordati Ireland Limited

Reg. No: P0476-03

Location Address: Raheens East, Ringaskiddy, County Cork

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 Uisce Éireann.	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 <i>(Yes/No)</i>
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 Uisce Éireann.	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 UÉ.	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 Uisce Éireann and the Local Authority in a manner and timeframe as may be specified by Uisce Éireann.	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 Uisce Éireann as requested.	No
8. The licensee shall pay to Uisce Éireann 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 Uisce Éireann.	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).	No
10. The licensee shall conclude an end user agreement with Uisce Éireann.	Yes
11. In the event of any incident which relates to discharges to sewer having taken place, the licensee shall notify Uisce Éireann and the Local Authority, in the manner prescribed by Uisce Éireann, 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 Uisce Éireann 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 Uisce Éireann 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. 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 Uisce Éireann.</p>	
---	--

<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 IDA Pipeline***Schedule B: Emission Limits***Emission Point Reference No.: **SE1 (TE1)**

Emission to **(pipeline description)**: IDA pipeline located downstream of Uisce Éireann's Ringaskiddy WWTP (Shanbally) which outfalls to Dognose Bank, Cork Harbour

Volume of Trade effluent emitted: Maximum in any one day: 100 m³
 Maximum rate per hour: 10m³

Discharge Point Reference No.	TE1		
Parameter	Emission Limit Values*		
Temperature	30 °C		
pH	6.5 - 9 pH units		
Toxicity	10 TU		
	Concentration (mg/l)	Load (kg/day)	(BAT -AEL) (kg/year)
BOD	300	30	-
COD-Cr	1000	27	9855
Suspended Solids	100	9	3285
Sulphate	1000	-	-
Total Nitrogen (as N)	100	6.5	2373
Total Heavy Metals	1	-	-
Volatile Organic Compounds	1	-	-
Fats, Oils and Greases	10	-	-
Anionic Detergents (as MBAS)	5	-	-
Total Phosphorus (as P)	200	0.75	273.75
AOX	1	0.25	91.25

Chromium (as Cr)	1	0.006	2.19
Copper	1	0.012	4.38
Nickel	1	0.012	4.38
Zinc	1	0.08	29.20

Frequency of Monitoring Process Effluent to IDA Pipeline

Schedule C

Emission Point Reference No.: SE1 (TE1)

Parameter	Monitoring Frequency*	Analysis Method/Technique
Flow Rate	Continuous	On-line flow meter with recorder
pH	Continuous	pH electrode/meter and recorder
Temperature	Continuous	On-line temperature probe and recorder
COD-Cr	Three times weekly ^{Note 1}	Standard Method
BOD, 5 days with Inhibition (Carbonaceous BOD)	Monthly ^{Note 1}	Standard Method
Suspended Solids	Three times weekly ^{Note 1}	Standard Method
Total Nitrogen (as N)	Weekly ^{Note 1}	Standard Method
Total Phosphorus (as P)	Quarterly ^{Note 1}	Standard Method
Fats, Oils and Greases	Monthly ^{Note 1}	Standard Method
Anionic Surfactants/Detergents (as MBAs)	Annually ^{Note 1}	Standard Method
Sulphate	Quarterly ^{Note 1}	Standard Method
Metals & Organic Compounds	Annually ^{Note 1 & Note 3}	Standard Method
Toxicity ^{Note 2}	Biannually ^{Note 1}	Standard Method

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

Note 2: The number of toxic units (Tu) = 100/x hour EC/LC₅₀ in percentage vol/vol so that higher Tu values reflect greater levels of toxicity. For test regimes where species death is not easily detected, immobilisation is considered equivalent to death.

Note 3: 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).

Control of Emissions to IDA Pipeline

Control Parameter	Monitoring	Key Equipment ^{Note 1}
Forward feed pH	Continuous pH	Dosing Pumps
Effluent forward feed	Continuous flow	Forward feed pumps
Dissolved Oxygen	Continuous DO	Blowers
Mixed Liquor Suspended Solids	Suspended solids (3 times weekly)	Sludge transfer pumps

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, Oil and Grease generated as a result of any canteen activities

Control Parameter	Monitoring	Key Equipment ^{Note 1}
Fats, oil and grease removal	Fats, oil 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 or as otherwise specified by Uisce Éireann.

Signed on behalf of

DocuSigned by:

 23AF15FC6196408...

5/1/2023

Date _____