



Marian Doyle  
Inspector, Office of Climate  
Licensing & Resource Use.  
EPA McCumsiskey House, Richview,  
Clonskeagh Rd,  
D14  
15.02.10

**RE: Technical Amendment of Waste Licence W0054-02**

Marian,

Please find attached information as requested.

**Current Source of Emissions to Sewer**

- Source is from Eco-Safe Systems Rotoclave Sterilisation Process (The Rotoclave 'cooking' process causes plastics to soften and flatten, paper and other fibrous material to disintegrate into a fibrous mass, bottles and metal objects to be cleaned, and labels etc. to be removed. The process reduces the volume of the waste by ~60%. After 'cooking', the steam flow is stopped and the pressure vented via a condenser. The resulting condensed vapor is discarded to sewer)
- Emission Point Reference No: E310423 N 232905
- Monitoring is carried out in accordance with Condition 8.6 of W0054-02. This is currently being upgraded to give a total value for volume discharged to sewer on an annual basis.

**Attachments**

Annex 1 - Summary of Effluent Parameters 2007 -2009

Annex 2 - Production total 2008 & 2009

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**Eco-Safe Systems Ltd.**

Unit 1a Allied Industrial Estate, Kylemore Road, Dublin 10

Ph: +353 1 6239135 Fax: +353 1 6239136

Email: [services@srcl.com](mailto:services@srcl.com) . [www.ecosafesystems.ie](http://www.ecosafesystems.ie)

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### **Proposed Emissions to Sewer and increase in volume (Biosystems)**

(All quantities and calculation are estimates based on a US Plant)

The Machine holds approximately 3 cubic liters in both the wash and sanitise holding tanks.

A US Plant of a higher throughput than we expect will dump roughly 9,460 liters (2,500 gallons) each week to sewer – (i.e. dumps the holding tanks tanks 3 times per week).

#### **Typical Discharges - Chemistry (example):**

Discharge Tested for:	Avg Results (mg/L)
pH	N/A (6-10)
Settleable Solids	0.08
BOD	62
COD	220
TSS	51
NH3	0.61
Cadmium	0.026
Chromium	0.017

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#### **Eco-Safe Systems Ltd.**

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**Correspondence from Eco-safe Systems to DCC and EPA**

Attachments;

Annex 3 - DCC new Limits for Eco-Safe Systems Ltd 11.08.09

Annex 4 - Raising Flow rate 28.05.07

Annex 5 - Rising Limits 9.01.06

Annex 6 – EPA Approval 24.01.07

Hoping that this meets your requirements and should you require further information please do not hesitate to contact me.

Kind Regards,

Joe Mahon,  
Eco-Safe Systems Ltd

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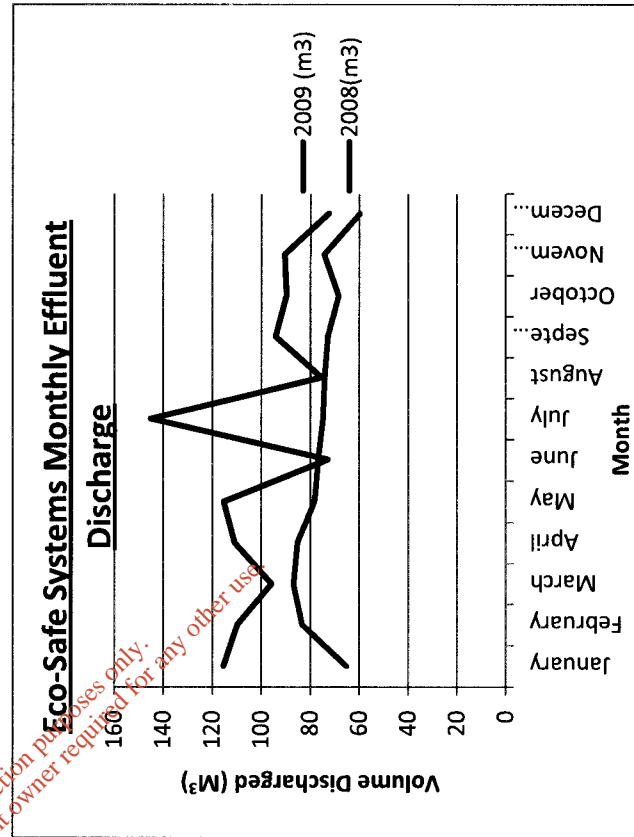
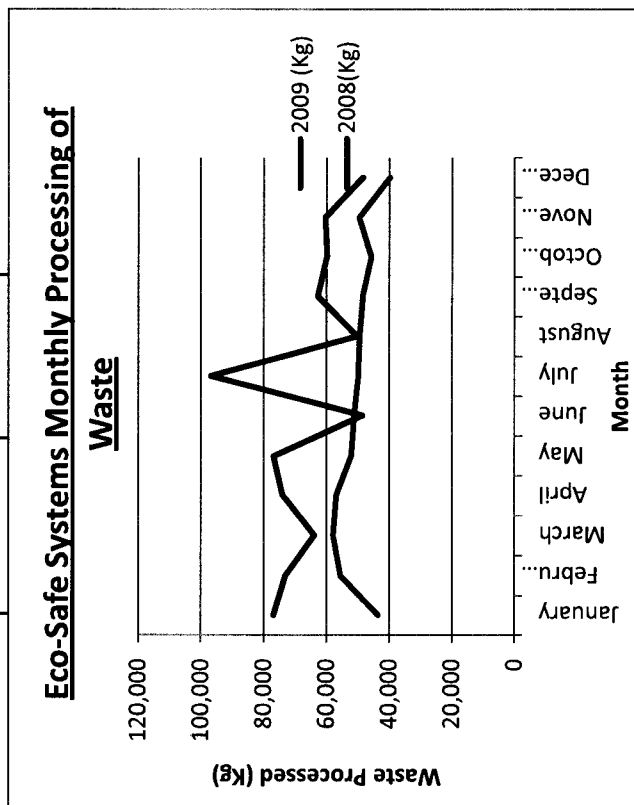
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Monthly Processing of Waste		
Month	2009 (Kg)	2008(Kg)
January	43,407	76,773
February	55,469	73,053
March	57,798	63,753
April	56,772	73,880
May	52,109	76,773
June	51,229	48,451
July	49,849	96,792
August	49,424	50,172
September	48,510	62,706
October	45,572	59,729
November	49,525	60,237
December	39,745	48,175



Calculations are based on the fact that approximately ratio of weight to volume is 1:1.5. Such estimates result in the following numbers being calculated

Monthly Discharge to Sewer		
Month	2009 (m3)	2008(m3)
January	65.10975	115.1598
February	83.20365	109.5794
March	86.69715	95.6301
April	85.1577	110.8206
May	78.1635	115.1598
June	76.8432	72.67575
July	74.77365	145.1883
August	74.1366	75.2574
September	72.7647	94.05945
October	68.35785	89.59335
November	74.28735	90.35565
December	59.61705	72.2625



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Mr Joe McMahon,  
Eco-Safe Systems,  
Unit 1a Allied Industrial Estate,  
Kylmore Road,  
Dublin 10

Engineering Department  
Drainage Division  
Floor 2, Block 1  
Civic Offices  
Fishamble Street  
Dublin 8  
Tel: 353-1-2222090  
Fax: 353-1-2222300  
Website: [www.dublincity.ie](http://www.dublincity.ie)

Date: 11<sup>th</sup> August 2009

**Re: EPA Waste Licence 54-2**

Dear Joe,

I refer to your correspondence of 11-08-09 requesting a raising of the allowable discharge limits for the parameters Biochemical Oxygen Demand and Chemical Oxygen Demand and Flow in the consent given by Dublin City Council for EPA Waste Licence 54-2.

After consideration of your request I wish to inform you that Dublin City Council has no objection to new limits as follows

Parameter	Emission	Limit Value	
	Grab	Daily Mean	Daily Mean
	Sample	Concentration	Loading
	(mg/l)	(mg/l)	(kg/day)
B.O.D.	5,000	4,000	100.0
C.O.D.	15,000	12,000	300.0
Suspended Solids	500	400	10.0
Sulphates(asSO <sub>4</sub> )	1,000	1,000	25.0
Ph	6-10	6-10	
Temperature	42 degrees C		

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Oifigi na Cathrach  
Sráid Sheamais an Eisc  
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Tel: 353-1-6722155  
Fac: 353-1-6790809  
Idirline: [www.dublincity.ie](http://www.dublincity.ie)

The loadings are based on a maximum flow rate of 25 cubic metres per day.

As the flow rate has now been increased I would request that you send monthly discharged flow readings to this office.

Yours Sincerely

  
Martin Ryan.

Senior Engineer

This matter is being dealt with by Mr. John Collins @2222090

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Mr. Alan Stephens,  
O.E.E East/North East Region,  
EPA,  
McCumiskey House,  
Richview,  
Clonskeagh Rd  
Dublin 14

28.05.2007

**Ref: W0054-02 Schedule C1-Request for Amendment to Effluent ELV**

Dear Mr. Stephens,

Following internal monitoring carried out on volume of effluent emitted from Eco-Safe facility it has been noted that spikes on occasion occur which exceed our licence limit of 15m<sup>3</sup> per day. These spikes occur on days when there are additional batches processed. Eco-Safe have made a successful application to Dublin City Council Drainage Division to increase the effluent emission from 15m<sup>3</sup> to 25m<sup>3</sup> (please see correspondence attached from Dublin City Council) and wish to agree this new limit with the Agency.

I trust this is to the satisfaction of the Agency however should you require any further information please do not hesitate to contact me.

Yours truly,

  
Elish Fitzpatrick  
Environmental Health and Safety Manager  
Eco-Safe Systems Ltd.

**Eco-Safe Systems Ltd.**

Unit 1a Allied Industrial Estate, Kilmore Road, Dublin 10

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Directors – William Blyde (UK), Neville Graver (IRE), Frank van Brink (USA), Shazeen Sacranie (USA)

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RECEIVED 25 MAY 2007

Dublin City Council  
Comhairle Cathrach Bhaile Atha Cliath

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Fishamble Street  
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Ms. Eilish Fitzpatrick,  
Environmental Health and Safety Manager,  
Ecosafe Systems  
Unit 1a Allied Industrial Estate,  
Kylmore Road  
Dublin 10

Date: 22nd May 2007

Dear Mr. Eilish,

Further to your query for an increase in your effluent emission from 15 to 25 cubic metres per day I wish to confirm that Drainage Division has no objection to such an increase.

Yours Sincerely

Martin Ryan,

Senior Engineer

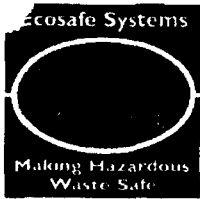
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Head Office, Civic Offices, Wood Quay, Dublin 8, Ireland  
Oifigí na Cathrach, An Ché Adhmaid, 8 A.C. 8, Éire

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Mr. Alan Stephens,  
O.E.E East/North East Region,  
EPA,  
McCumiskey House,  
Richview,  
Clonskeagh Road,  
Dublin 14.

09-01-06

**Re: Raising of allowable discharge limits for the parameters BOD and COD**

Dear Mr. Stephens,

The licensee wish to make a technical amendment to the limits outlined in license 54.2.  
Please find attached revised limits for BOD and COD limits Issued by the Dublin City Council.

Yours sincerely,

**Joe Mahon**

**Environmental Health and Safety Assistant,  
Eco-Safe Systems Ltd.**

Eco-Safe Systems Limited.  
Directors: Gerard Casey, Frank Masterson B. Comm FCA, Manus Agnew ASCS, MRICS, Dr. Kevin McDonnell, Kevin McCarthy.

Registered in Ireland, Registered No. 288221, V.A.T. No. 8288221U.



**Dublin City Council**  
Comhairle Cathrach Bhaile Átha Cliath

Ms. Eilish Fitzpatrick,  
Environmental Health and Safety Manager,  
Ecosafe Systems,  
Unit 1a Allied Industrial Estate,  
Kylemore Road,  
Dublin 10

**Engineering Department**  
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RECEIVED 21 DEC 2005

Date: 19<sup>th</sup> December 2005

**Re: EPA Waste Licence 54-2**

Dear Eilish,

I refer to your correspondence of 24-11-05 requesting a raising of the allowable discharge limits for the parameters Biochemical Oxygen Demand and Chemical Oxygen Demand in the consent given by Dublin City Council for EPA Waste Licence 54-2.

After consideration of your request I wish to inform you that Dublin City Council has no objection to new limits as follows

Parameter	Emission	Limit Value	
	Grab	Daily Mean	Daily Mean
	Sample (mg/l)	Concentration (mg/l)	Loading (kg/day)
B.O.D.	5,000	4,000	28.0
C.O.D.	15,000	12,000	84.0
Suspended Solids	500	400	2.8
Sulphates(asSO4)	1,000	1,000	7.0
Ph	6-10	6-10	
Teperature	42 degrees C		

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Ceannofig, Oifigí na Cathrach, An Ché Adhnaid, B.Á.C. 8, Éire

I will be writing to the E.P.A. to inform them of this. I return your cheque for €380 as there is no charge for this service.

Yours Sincerely

  
Martin Ryan,

Senior Engineer

This matter is being dealt with by Mr. John Collins @2222090

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Mr John Johnston  
Managing Director  
Eco-Safe Systems Ltd  
Unit IA  
Allied Industrial Estate  
Kylemore Road  
Dublin 10

Environmental Protection Agency  
Regional Inspectorate, McCumiskey House  
Rathview, Clonsilla Road, Dublin 14, Ireland  
An Ghníomhaireacht um Chaomhú, Coimhshuí  
Cigireacht Réigiúnaigh, Teach Mhic Chumaiscigh  
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En Call: 1890 33 55 99

24/01/2007

Our Ref: M54-2/Gen05AS.doc


**Re. Discharges to foul sewer from Eco-Safe Systems Ltd,  
EPA Waste Licence Reg. No. 54-2**

Dear Mr. Johnston

The Agency note that in correspondence from Dublin City Council (DCC) dated 21/12/2005 and received by the Agency on 09/01/06 that DCC agree to new limits for emission to foul sewer on Kylemore Road from emission point reference no. E310423 N 232905.

Please quote the above reference in future correspondence in relation to this matter.

Yours sincerely

  
Alan Stephens  
Inspector  
Office of Environmental Enforcement

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