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Mr Martin Ryan,
Senior Engineer,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24

18th February 2010

Reg No: **W0054-02**

Dear Mr Ryan,

I am to advise you that the Agency has received a request from Eco-Safe Systems Limited for a technical amendment to their existing waste licence W0054-02. The facility is located at Unit 1A Allied Industrial Estate, Kylemore Road, Dublin 10.

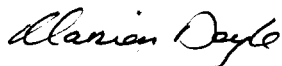
The licensee has requested changes to their emission to sewer. I am to request your consent to the proposed discharge changes. Please complete the attached reply form including Schedule B: *Emission Limits* and Schedule C *Frequency of Monitoring*. See attached:

- Letter from the Agency to the licensee (dated 16th December 2009) requesting further information;
- Response from Eco-Safe Systems Limited (dated 15th February 2010);
- Relevant sections of Waste Licence W0054-02.

In accordance with the requirements of the Waste Management Acts and EPA Acts, your consent may be subject to such conditions as the authority considers appropriate. Your attention is drawn to paragraphs (3) and (4) of the attached copy of the relevant section of the Act.

You are requested to forward your response within **4 weeks** of the date of this letter. If you have any queries please contact Marian Doyle at 01-2680100.

Yours sincerely,



Marian Doyle
Licensing Unit
Office of Climate, Licensing & Resource Use

Section 99E (3) & (4) of the Environmental Protection Agency Acts, 1992 and 2007

- (3) Subject to subsection (4), a consent under subsection (1) may be granted subject to or without conditions and if it is granted subject to conditions the Agency shall include in the licence or revised licence concerned conditions corresponding to them or, as the Agency may think appropriate, conditions more strict than them.
- (4) The conditions that may be attached to a consent by a sanitary authority under this section are the following and no other conditions, namely conditions-
- (a) relating to-
 - (i) the nature, composition, temperature, volume, level, rate, and location of the discharge concerned and the period during which the discharge may, or may not, be made,
 - (ii) the provision, operation, maintenance and supervision of meters, gauges, manholes, inspection chambers and other apparatus and other means for monitoring the nature, extent and effect of emissions,
 - (iii) the taking and analysis of samples, the keeping of records and furnishing of information to the sanitary authority,
 - (b) providing for the payment by the licensee to the sanitary authority concerned of such amount or amounts as may be determined by the sanitary authority having regard to the expenditure incurred or to be incurred by it in monitoring, treating and disposing of discharges of trade effluent, sewage effluent and other matter to sewers in its functional area or a specified part of its functional area,
 - (c) specifying a date not later than which any conditions attached under this section shall be complied with,
 - (d) relating to, providing for or specifying such other matter as may be prescribed.

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Waste Licence application Register No. **W0054-02**

Emission Point Reference No: _____

Parameter <i>(delete parameters which are not applicable)</i>	Monitoring Frequency <i>(e.g. monthly, quarterly, annually)</i>	Sampling Type <i>(grab, composite)</i>
Flow to sewer		
Temperature		
pH		
BOD		
COD		
Suspended Solids		
ADDITIONAL PARAMETERS <i>(if required)</i>		

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of process effluent (per s52 of the Waste Management Acts, 1996 to 2008)	
Payment Frequency	
Annual Monitoring Costs	

Signed on behalf of Dublin City Council

_____ Date _____

Headquarters,
P.O. Box 3000,
Johnstown Castle Estate
County Wexford, Ireland

WASTE LICENCE

**Waste Licence
Register No:**

54-2

Applicant:

Eco-Safe Systems Limited

Location of Facility:

Unit 1A, Allied Industrial Estate, Kylemore
Road, Ballyfermot, Dublin 10

INTRODUCTION

This introduction is not part of the licence and does not purport to be a legal interpretation of the licence.

Eco-Safe Systems Limited is currently licensed to accept and sterilise healthcare risk waste at their facility in Unit 1A, Allied Industrial Estate, Kylemore Road, Ballyfermot, Dublin 10. They have applied to review their existing licence. The acceptance and sterilisation of healthcare risk waste will continue at the facility. The revised licence allows them to operate a transfer station at their facility (primarily for hazardous waste); to sterilise additional waste types in their existing autoclave; to sterilise obsolete mechanical equipment in a new static autoclave shred tyres and to provide a confidential data destruction service. Alterations to the odour abatement equipment will be required prior to the heat treatment of certain infectious waste types.

This licensee is required to manage and operate the facility to ensure that the activities do not cause environmental pollution. The licensee is required to carry out regular environmental monitoring and submit all monitoring results, and a wide range of reports on the operation and management of the facility to the Agency.

This licence sets out in detail the conditions under which Eco-Safe Systems Limited will operate and manage the facility.

5.12.4 All processed healthcare waste removed off site shall be accompanied by a consignment note and shall be certified by a technically competent person from the testing laboratory that the waste has been processed (microbiologically tested) in accordance with this licence. The testing laboratory to be employed during operation of the facility shall be agreed in advance with the Agency.

5.13 Maintenance

5.13.1 Maintenance of the Rotoclave, Static Autoclave, conveyors and shredders shall be in accordance with the instructions issued by the manufacturer/supplier.

5.13.2 All treatment/abatement and emission control equipment shall be calibrated and maintained, in accordance with the instructions issued by the manufacturer/supplier or installer. Written records of the calibrations and maintenance shall be made and kept by the licensee.

5.13.3 The licensee shall maintain and clearly label and name all sampling and monitoring locations.

REASON: *To provide for appropriate operation of the facility to ensure protection of the environment.*

CONDITION 6 EMISSIONS

6.1. No specified emission from the facility shall exceed the emission limit values set out in *Schedule C: Emission Limits* of this licence. There shall be no other emissions of environmental significance.

6.2. The licensee shall ensure that the activities shall be carried out in a manner such that emissions do not result in significant impairment of, or significant interference with the environment beyond the facility boundary.

6.3. Emission limits for emissions to atmosphere in this licence shall be interpreted in the following way:

6.3.1. Non-Continuous Monitoring

(i) For any parameter where, due to sampling/analytical limitations, a 30 minute sample is inappropriate, a suitable sampling period should be employed and the value obtained therein shall not exceed the emission limit value.

(ii) For all other parameters, no 30 minute mean value shall exceed the emission limit value.

(iii) For flow, no hourly or daily mean value shall exceed the emission limit value.

6.4. The concentration limits for emissions to atmosphere specified in this licence shall be based on gas volumes under standard conditions of:

Temperature 273K, Pressure 101.3 kPa (no correction for oxygen or water content).

6.5. Emissions to Sewer

6.5.1. Unless otherwise agreed in advance with the Agency and the Sanitary Authority, the following shall apply for the discharge of wastewater, which shall be via the agreed sewer location on the Kylemore Road. There shall be no other discharge or emission to sewer of environmental significance.

- 6.5.2. Emission limits for emissions to sewer shall be interpreted as follows.
- (i) No pH value shall deviate from the specified range;
 - (ii) No temperature value shall exceed the emission limit value;
 - (iii) Eight out of ten consecutive results, calculated as daily mean concentration or mass emission values on the basis of flow proportional composite sampling shall not exceed 1.2 times the emission limit value; and
 - (iv) For parameters other than pH, temperature and flow, no grab sample value shall exceed 1.2 times the emission limit value.
- 6.5.3. No substance shall be present in emissions to sewer in such concentrations as would constitute a danger to sewer maintenance personnel working in the sewerage system, or as would be damaging to the fabric of the sewer, or as would interfere with the biological functioning of a downstream wastewater treatment works.
- 6.5.4. The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus installed, in connection with the discharge or emission, and to take samples of the discharge or emission.
- 6.5.5. Monitoring and analyses equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge.
- 6.5.6. The licensee shall ensure that the discharge shall not contain dissolved methane, petroleum spirits or organic solvents (including chlorinated organic solvents), at concentrations, which would give rise to flammable or explosive vapours in the sewer.
- 6.5.7. Non-trade effluent wastewater (e.g. firewater, accidental spillage) which occurs on-site shall not be discharged to the sewer without the prior authorisation of the Sanitary Authority.
- 6.5.8. The licensee shall provide and maintain an inspection chamber in a suitable position in connection with each pipe through which a discharge or emission is being made. Each such inspection chamber or manhole shall be constructed and maintained by the licensee so as to permit the taking of samples of the discharge.
- 6.5.9. The licensee shall submit monitoring results to the Sanitary Authority on an annual basis.
- 6.5.10. The trade effluent shall be screened prior to discharge to remove gross solids and avoid blockages in the sewer.
- 6.5.11. The trade effluent shall not contain active viruses, pathogens and/or unsterilised body fluids.
- 6.5.12. No radioactive material shall be discharged to sewer.
- 6.6 There shall be no direct emissions to groundwater.
- 6.7 There shall be no clearly audible tonal component or impulsive component in the noise emissions from the activity at the noise sensitive locations.
- 6.8 Trigger Level for Airborne micro-organisms

SCHEDULE C : Emission Limits

C.1 Emissions to Sewer

Emission Point Reference No: E310423 N 232905

Emission to : Foul Sewer on Kylemore Road

Volume to be emitted: 15m³/day

Parameter	Emission Limit Value		
	Grab Sample (mg/l)	Daily Mean Concentration	Daily Mean Loading (kg/day)
BOD	1,000	800	12
COD	3,000	2,400	24
Sulphates	1,000	1,000	1
Suspended Solids	500	400	0.4
pH	6-10	6-10	
Temperature	42°C		

C.2 Noise Emissions: (Measured at any noise sensitive location).

Day dB(A) L _{Aeq} (30 minutes)	Night dB(A) L _{Aeq} (30 minutes)
55	45

C.3 Emissions to Atmosphere

Emission Point Reference Nos.

EP1

Name of Emission Point:

Main Stack following abatement

Parameter	Emission Limit Value ^(Note 1)
Indicator Microorganisms	2,000 cfu/m ³
Total Particulates	50mg/m ³
Ammonia	50 mg/m ³ (at mass flows > 0.1kg/hr)
Hydrogen Sulphide and Mercaptans	5 mg/m ³
Total Volatile Organic Compounds	0.1 kg/hr

SCHEDULE D : Monitoring

Monitoring to be carried out as specified below.

D.1 Monitoring Locations

Monitoring locations shall be those as set out in Table D.1.1.

Table D.1.1 Monitoring Locations

Rotoclave Temperature Stations	Noise Stations	Ambient Air Monitoring	Air Emission Point	Emissions to Sewer
Note 1	NMP 3,4,5,6	4 Boundary monitoring locations (Note 2)	EP1	FSI ^{Note 3}

Note 1: Thermocouple locations in Rotoclave unit to be agreed with the Agency.

Note 2: Locations to be agreed with the Agency.

Note 3: Foul Sewer in Kylemore Road.

D.2 Emissions to Sewer

Table D.2.1 Sewer Monitoring Frequency and Techniques

Parameter	Monitoring Frequency	Analysis Method/Technique
PH	Quarterly	Electrometry
Biological Oxygen Demand	Quarterly	Standard Methods ^{Note 1}
COD	Quarterly	Standard Methods ^{Note 1}
Sulphates	Quarterly	Standard Methods ^{Note 1}
Suspended Solids	Quarterly	Standard Methods ^{Note 1}
Volume	Quarterly	Method to be agreed with the Agency
Total coliform/100ml	Quarterly	Standard Methods ^{Note 1}
Faecal coliform/100ml	Quarterly	Standard Methods ^{Note 1}
Faecal streptococci/100ml	Quarterly	Standard Methods ^{Note 1}
Culturable Enteroviruses	Quarterly	Standard Methods ^{Note 1}

Note 1: "Standards Methods for the Examination of Water and Wastewater", (prepared and published jointly by A.P.H.A., A.W.W.A & W.E.F) 20th Ed., American Public Health Association, 1015 Fifteenth Street, Washington DC 20005, USA.

