



Environmental Protection Agency  
An Ghníomhaireacht um Chaomhnú Comhshaoil

Regional Inspectorate  
McCumiskey House, Richview,  
Clonskeagh Road, Dublin 14, Ireland

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Mr Martin Ryan,  
Senior Engineer,  
Drainage Division,  
Dublin City Council  
Civic Offices,  
Fishamble Street  
Dublin 8

04<sup>th</sup> March 2010

Reg No: **W0054-02**

Dear Mr Ryan,

The following is regarding the 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.

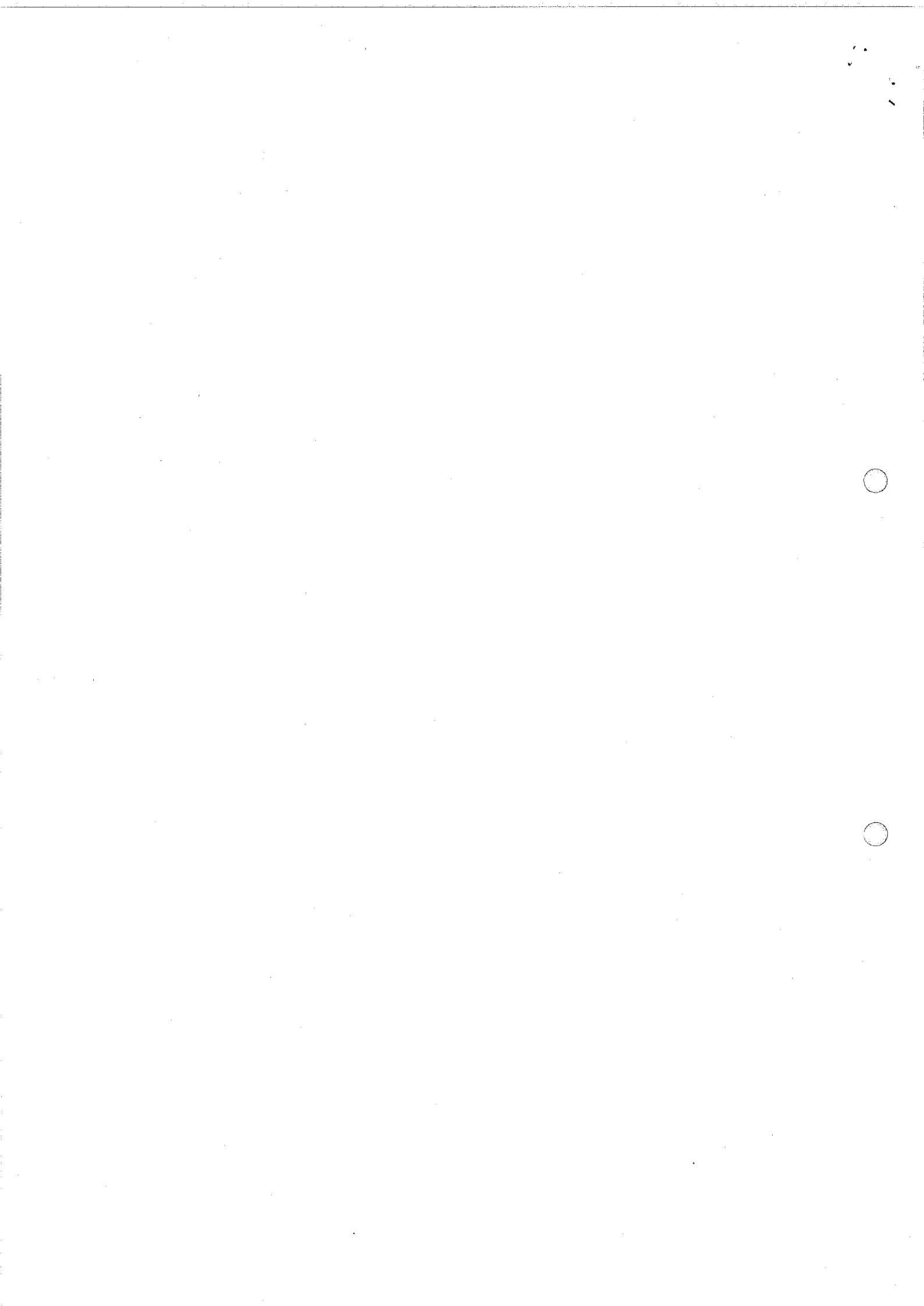
Please see attached correspondence from Eco-Safe Systems Limited to the Agency's Office of Environmental Enforcement and to Dublin City Council dated 05<sup>th</sup> February 2010, relating to their emissions to sewer. Please have regard to this information in your consent to requested changes to emission to sewer.

Also attached is the technical amendment request from Eco-Safe Systems Limited dated 28<sup>th</sup> October 2009.

If you have any queries please contact Marian Doyle at 01-2680100.

Yours sincerely,

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





Environmental Protection Agency

- 8 FEB 2010

OFFICE OF ENVIRONMENTAL  
ENFORCEMENT  
RICHVIEW

Martin Ryan  
Drainage Division,  
Engineering Department,  
Floor 2, Block 1,  
Civic Offices,  
Fishamble Street,  
Dublin 8

Mary Gurrie  
OEE East/North East Region  
Environmental Protection Agency  
McCumiskey House  
Clonskeagh Rd  
Dublin 4

5.02.10

**Re: Eco-Safe Systems Ltd W0054-02 Schedule D2 Emissions to Sewer.**

To whom it may concern;

Eco-Safe Systems operates under EPA Waste Licence W0054-02 and under the planning reference number 01 864/99.

Under license conditions (Schedule D.2) it's a requirement for Eco-Safe Systems to carry out Culturable Enteroviruses analysis on effluent discharge to sewer. Up till 2008 this analysis was carried out in UK but now has ceased and I have not been able to find a facility that can carry out such analysis.

I have contacted both NVRL Belfield and City Analyst Dublin to see if there is analysis is available in Ireland or in the UK but to no success. Please find attached correspondence for both bodies.

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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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I wish to request the assistance of the Environmental Protection Agency and Dublin City Council as to ascertain what options are available to the licensee at this point.

Should you wish to contact me to discuss this issue further please don't hesitate in doing so, e-mail [jmahon@srcl.com](mailto:jmahon@srcl.com) or telephone 0871228490.

Regards,

A handwritten signature in black ink that reads "Joe Mahon". The signature is written in a cursive style.

Joe Mahon,  
Eco-Safe Systems Ltd

---

**Eco-Safe Systems Ltd.**

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Deirdre Burke  
Laboratory Manager,  
UCD National Virus Reference Laboratory  
University College Dublin,  
Belfield,  
Dublin 4.  
5.01.10

Dear Deidre,

Eco-Safe Systems (EPA waste license W0054-02) and SRCL Ireland (EPA waste license W0055-02) are waste management companies both operating in the Dublin area. Both companies are part of the Stericycle Group (<http://www.stericycle.com/>)

Due to the nature of operations at both facilities one of the major areas of concern is working within EPA license conditions.

Under license conditions it's a requirement for both facilities to carry out Culturable Enteroviruses analysis on effluent discharge to sewer. Between both facilities this would total 16 samples a year.

Up till recently this analysis was carried out in UK but now has ceased and I have not been able to find a facility that can carry out such analysis.

I have been in discussion with our EPA inspector and informed him of the situation. The EPA has requested that I contact the NVRL and seek clarification on whether the analysis can be carried out in Belfield.

If such analysis cannot be carried out without undertaking unreasonable action then the EPA have agreed to amend both facilities licenses to reflect such.

I would appreciate if you could take the time to replying as to whether the NVRL can carry out such analysis.

Regards,

Joe Mahon  
Eco-Safe Systems

---

**Eco-Safe Systems Ltd.**

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

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

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**From:** deirdre burke [deirdre.burke@ucd.ie]  
**Sent:** 05 January 2010 17:24  
**To:** Mahon, Joe  
**Subject:** Re: Enquiry

Hi Joe

Unfortunately we are not in a position to test effluent discharge for enterovirus. However there is a company called City Analysts in Dublin they should be able to perform the required analysis.

Kind regards  
Deirdre

----- Original Message -----

**From:** "Mahon, Joe" <jmahon@SRCL.com>  
**Date:** Tuesday, January 5, 2010 3:50 pm  
**Subject:** Enquiry  
**To:** deirdre.burke@ucd.ie

> Hi Deirdre,

> Could you please see attached document.

> Regards,

> **Joe Mahon**

> Eco-safe Systems  
> Unit 1a Allied Ind Estate,  
> Kylemore Rd Dublin 10.

> Tel: +353-1-6239135  
> Mob: +353-87-1228490

> [www.srcl.com](http://www.srcl.com)

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Deirdre Burke  
Laboratory Manager  
National Virus Reference Laboratory  
University College Dublin  
Dublin 4

**From:** Diarmuid Cooney [mailto:DCooney@cityanalysts.ie]  
**Sent:** 06 January 2010 10:30  
**To:** Mahon, Joe  
**Subject:** City Analysts [Scanned]

Morning Joe,

I am e-mailing you to inform you that the analysis "Cultured Enterovirus" is no longer available from City Analysts.

This test has been discontinued from our sub contracted lab in Reading and we are unable to find a suitable Laboratory in the UK and Ireland to offer this service.

Apologies for the inconvenience.

Regards

Diarmuid

**Diarmuid Cooney BSc PG Dip (Env Eng)**

**Customer Sales and Support Manager,**

**City Analysts Limited**

Environmental Laboratories

Pigeon House road,

Ringsend,

Dublin 4.

Tel: (01) 613 6003/6/9

Direct line: 01 6185806

Fax: (01) 613 6008

**E-Mail: [dcooney@cityanalysts.ie](mailto:dcooney@cityanalysts.ie)**

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LoCall: 1890 33 55 99

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

18<sup>th</sup> 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 16<sup>th</sup> December 2009) requesting further information;
- Response from Eco-Safe Systems Limited (dated 15<sup>th</sup> 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.

## SANITARY AUTHORITY RESPONSE

re: SECTION 52 OF THE WASTE MANAGEMENT ACTS, 1996 to 2008

**Name & Address of Sanitary Authority:**

**Waste Reg. No.**                                **W0054-02**

**Waste Facility:**

**Waste Licence Applicant:**        **Eco-Safe Systems Limited**

**Consent:**    Indicate Yes to one of the following statements:

Consent granted subject to the consent conditions outlined below	
Consent granted without conditions	
Consent refused <sup>Note 1</sup>	

**Note 1**    Where it is proposed to refuse permission the reasons for the refusal should be clearly outlined in the response.

GENERAL CONSENT CONDITIONS	Condition to be included (Yes/No)
1. No specified emission from the installation shall exceed the emission limit value set out in <i>Schedule B: Emissions Limits to Sewer</i> . There shall be no other emission to sewer of environmental significance.	
2. The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as out in <i>Schedule C</i> .	
3. Monitoring and analytical equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge or emission.	
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 process effluent, and to take samples of the process effluent.	
5. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity is being carried on unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternative sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.	
6. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.	
7. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and to off-site points as required by the Agency.	
8. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid, alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer.	





## 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		
<b>ADDITIONAL PARAMETERS</b> <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 \_\_\_\_\_

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