

Director of Services – Sanitary Services
Waterford City Council
City Hall
The Mall
Waterford

Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire

T: +353 53 9160600
F: +353 53 9160699
E: info@epa.ie
W: www.epa.ie

LoCall: 1890 33 55 99

21 December 2012

**Re: Technical Amendment to a Waste Licence Reg. No. W0177-03 for Greenstar
Environmental Services Limited.**

Dear Sir/Madam,

I am to advise you that the Agency has received a request from Greenstar Environmental Services Ltd. for a technical amendment to a Waste Licence Reg. No. W0177-03 for a facility located at Carrignard, Six Cross Roads, Business Park, Waterford City.

The request for technical amendment relates to authorised flow and emission limit values at the facility's emission point reference number FW1 which discharges to sewer. I enclose a copy of this request and an extract from *Schedule B: Emission Limits* of the waste licence which outlines the existing requirements for FW1.

The provisions of Section 52 of the Waste Management Acts, 1996 to 2012, provides that the Agency shall obtain the consent of the sanitary authority to the discharge from an activity which involves the discharge of trade effluent or other matter (other than domestic sewage or storm water), to a sewer vested in or controlled by a sanitary authority.

Waterford City Council previously responded to the Agency's Section 52 request for this facility on 12 May 2006 (copy attached). You will note that the actual limit values inserted into the licence are different to the Council's figures and the licensee has queried this while highlighting difficulty in meeting the limit values set out in the licence. In an effort to clear up this matter, I am to request that your authority re-asses the parameters, emission limit values and the flow from FW1 having regard to issues raised in the request for technical amendment. If it is appropriate to make amendments to your earlier response, I would be obliged if you would complete the section 52 form anew.

Please direct your response to Ms. Gráinne Oglesby, Programme Officer, Office of Climate, Licensing & Resource Use quoting the Reference: Request for a technical amendment W0177-03. Please address any queries regarding this request to the undersigned.

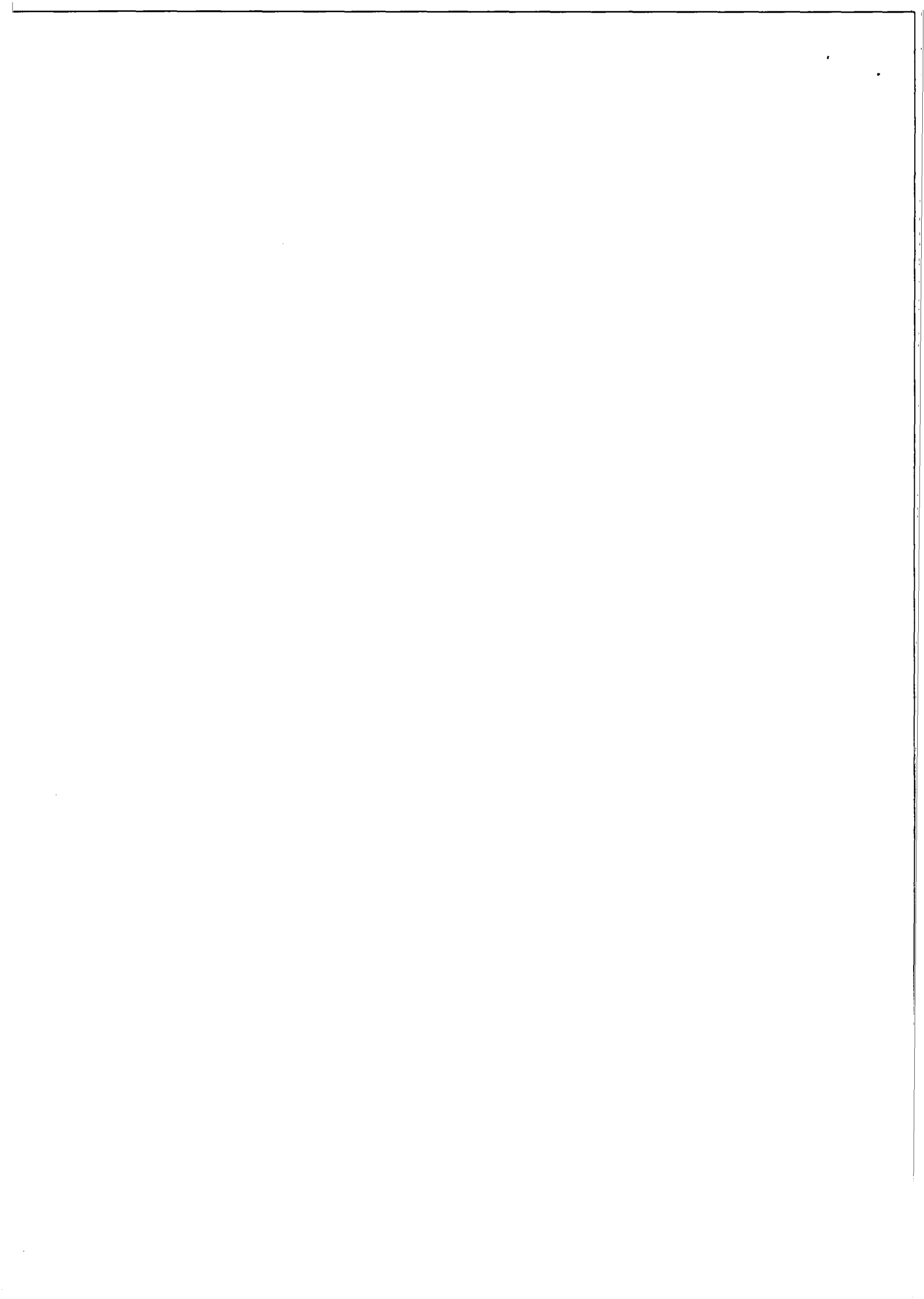
Yours sincerely,



Ewa Babiarczyk
Inspector
Environmental Licensing Programme

Encl. Blank section 52 sanitary response form;
Copy of the licensee's request for technical amendment;
Extract from the existing Licence *Schedule B: Emission Limits* for FW1.





SANITARY AUTHORITY RESPONSE
re: SECTION 52 OF THE WASTE MANAGEMENT ACTS, 1996 to 2011

Name & Address of Sanitary Authority: Waterford City Council, City Hall, The Mall,
 Waterford - Environment

Waste Reg. No. W0177-03

Waste Facility: Greenstar Environmental Services Ltd.,
 Carrignard, Six Cross Roads, Business Park,
 Waterford City

Waste Licence Applicant: Greenstar Environmental Services Ltd.

Consent: Indicate Yes to one of the following statements:

Consent granted subject to the consent conditions outlined below	
Consent granted without conditions	
Consent refused ^{Note 1}	

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.	

<p>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.</p>	
<p>9. In the event of any incident which relates to discharges to sewer, having taken place, the licensee shall notify the Agency, Local Authority and Sanitary Authority as soon as practicable after the incident.</p>	

<p>ADDITIONAL GENERAL CONSENT CONDITIONS in respect of discharges or emissions to sewers, in accordance with Section 52 of the Waste Management Acts, 1996 to 2011 <i>(specify, if required)</i></p>

Frequency of Monitoring Process Effluent to Sewer

Schedule C: Control & Monitoring

Waste Licence application Register No. W0177-03

Emission Point Reference No: FW1

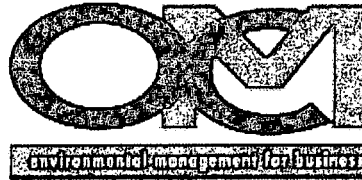
Parameter <i>(delete parameters which are not applicable)</i>	Monitoring Frequency <i>(e.g. monthly, quarterly, annually)</i>	Sampling Type <i>(grab, composite)</i>
Flow to sewer		
Temperature		
pH		
BOD		
COD		
Suspended Solids		
ADDITIONAL PARAMETERS <i>(if required)</i>		

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of process effluent (per s52 of the Waste Management Acts, 1996 to 2011)	
Payment Frequency	
Annual Monitoring Costs	

Signed on behalf of Waterford City Council

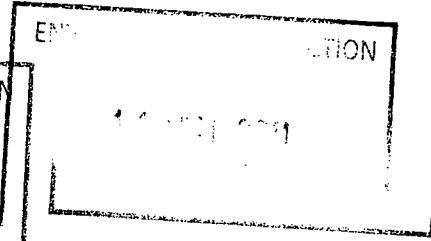
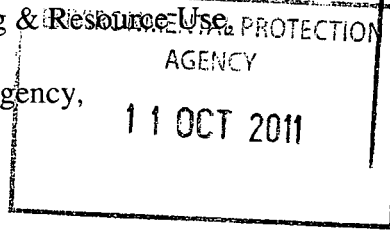
_____ Date _____

Granary House
Rutland Street
Cork



Tel: (021) 4321521
Fax: (021) 4321522

Office of Climate, Licensing & Resource Use
South East Region,
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford.



10th October 2011

**RE: Request for Technical Amendment - Foul Water Emission Limit Value -
Greenstar Environmental Services Ltd - Waterford W0177-03**

Dear Sir,

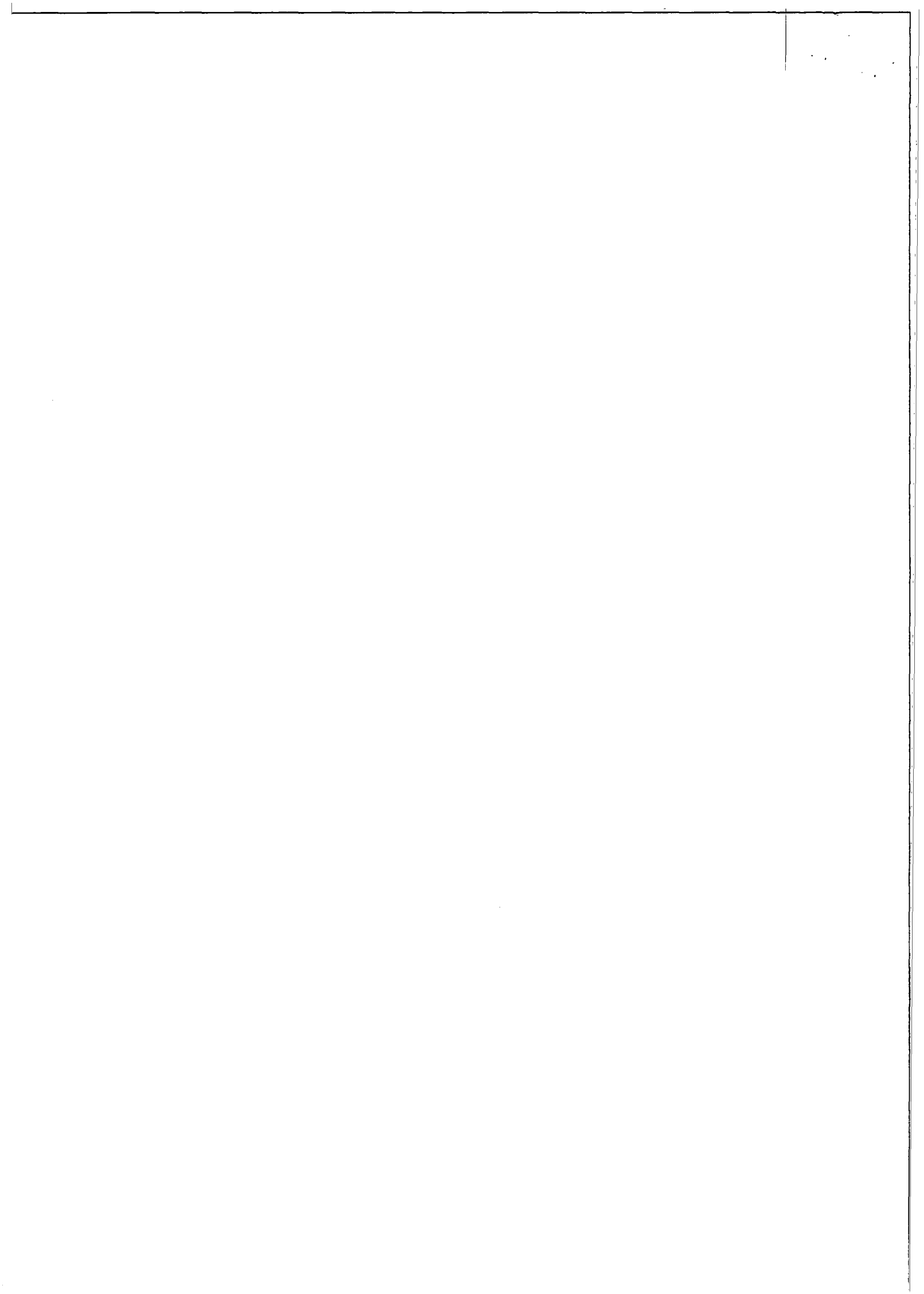
Greenstar Environmental Services Ltd. (GES), Six Cross Roads, Waterford requests a Technical Amendment to the Waste Licence to amend the emission limit value (ELV) for detergents and the wastewater flow rate specified in Schedule B.3 of the Licence

The wastewater comprises effluent from the truck and bin wash area and rainwater run-off from a section of paved open yard. It passes through two grit traps and an oil interceptor before discharging to Waterford City Council foul sewer which connects to the Council's wastewater treatment plant at Bellview.

The discharge is generally compliant with the ELV set in Schedule B3 with the exception of the detergent and flow. The ELV for detergent (0.2mg/l) is so low that it means GES cannot use any detergent to wash down vehicles or clean wheel bins.

The ELV does not appear to take into consideration that wastewater discharges to a foul sewer and is treated in a municipal wastewater treatment plant. It may be that the 0.2mg/l ELV is a typographical error, as there is no reference to a detergent ELV in the Section 52 Consent issued by Waterford City Council when the Waste Licence application was being processed (See enclosed).

GES requests that the ELV for detergent either be removed or increased to 100 mg/l, which is similar to that included in Licences for other Greenstar Materials Recovery Facilities (W0188-01 Greenogue, Dublin and W0188-01 Millennium Business Park, Dublin) that discharge wastewater to municipal foul sewers.



Schedule B3 restricts the volume of wastewater that can be discharged from the facility to 2.5m³ per day, which is not achievable given the requirement to wash vehicles and clean large number of wheeled bins daily and the fact that rainfall run-off from part of the site is a component of the flow.

The Section 52 Consent issued by Waterford City Council, authorises a discharge limit of 775m³ per day, with a maximum hourly rate of 31.2m³. A daily limit of 763m³, with a maximum hourly discharge of 31.8m³ had been authorised in the previous Licence (W0177-02).

The daily mean loadings specified in Schedule B3 of the Licence for Biochemical Oxygen Demand, Chemical Oxygen Demand, Suspended Solids and Oil Fats and Grease are derived from the Consent. Such loadings are calculated based on the daily flow (m³) and mean concentration (mg/l), however the loadings are not consistent with a daily discharge of 775m³ and the daily mean concentrations specified in the Consent.

The Agency identified this inconsistency and estimated that the achievement of the mean loadings set in the Consent would limit the daily discharge to 2.5m³. The Agency discussed this with the Licensee, who incorrectly advised the Agency that the maximum daily discharge would be approximately 2m³/day

Continuous flow monitoring of the wastewater discharge carried out since April 2010 has established that the maximum flow per day is 35m³. GES request that the flow rate be amended to 50m³ per day, and the daily mean loading be changed accordingly along with the corresponding kg/l limits.

OCM contacted Waterford City Council to discuss the proposed changes with the Water Services Department. The Council has not raised any objections to the proposed changes.

Yours sincerely,

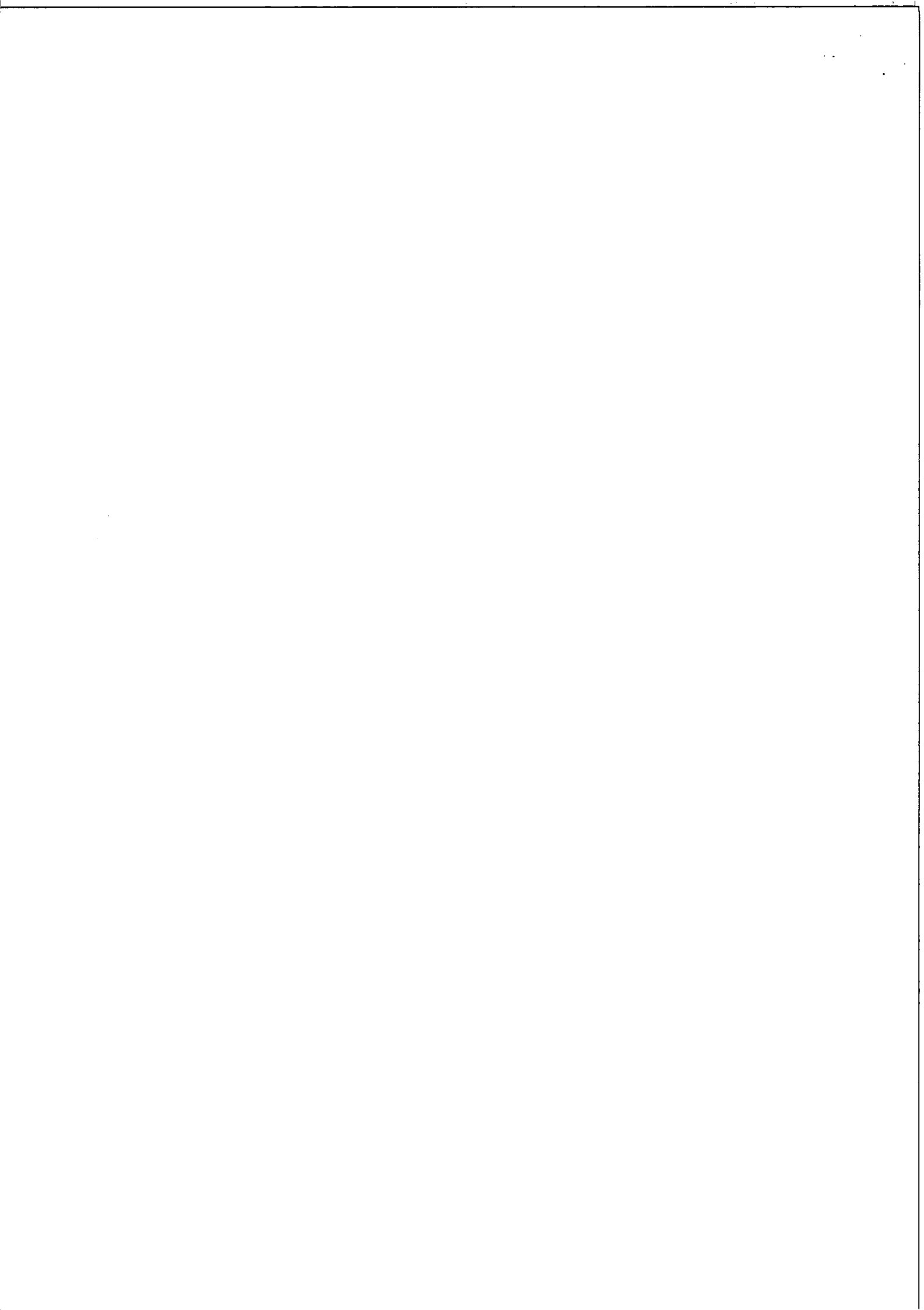


Michael Watson

1104825/MW/MG

Encl – Sanitary Authority Notification

C.c. Ms Suzanne Byrne, GES Ltd.,



SANITARY AUTHORITY RESPONSE

re: SECTION 52 OF THE WASTE MANAGEMENT ACTS, 1996 to 2005

Name & Address of Sanitary Authority: Waterford City Council, City Hall, The Mall, Waterford,
FAO: Ms Mary Breen, Administrative Officer, Planning
& Environment.

Waste Reg. No. W0177-03

Waste Facility: ONYX Ireland Ltd, Carrignard, Six Cross Roads,
Business Park, Waterford City

Waste Licence Applicant: ONYX Ireland Ltd

Consent: Indicate Yes to one of the following statements:

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

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.	YES
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.	"
9. In the event of any incident which relates to discharges to sewer, having taken place, the licensee shall notify the Agency, Local Authority and Sanitary Authority as soon as practicable after the incident.	"

ADDITIONAL GENERAL CONSENT CONDITIONS
in respect of discharges or emissions to sewers, in accordance with Section 52
of the Waste Management Act, 1996 to 2005
(Specify, if required)

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Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Waste licence application Register No. W0177-03

Emission Point Reference No: FW1

Emission to (sewer description): FOUL SEWER AT BALLYBEG, WATERFORD.

Volume to be emitted: Maximum in any one day: 775 m³

Maximum rate per hour: 31.2 m³

Parameter <i>(delete parameters which are not applicable)</i>	Emission Limit Value	
	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD	400	1.00
COD	1,100	2.70
Suspended Solids	300	1.00
PH	6-9	
Temperature	18°C	
ADDITIONAL PARAMETERS <i>(if required)</i>		
OFG	10	0.05
CONDUCTIVITY (µS/cm)	1500	

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Waste Licence application Register No. W0177-03

Emission Point Reference No: FW1

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

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of process effluent (per s52 of the Waste Management Acts, 1996 to 2005)	€ 0.14 → TOTAL FOR 2006 IS € 188.00
Payment Frequency	ANNUALLY
Annual Monitoring Costs	€ 184.00

TOTAL CHARGES FOR 2006 → € (188+184) = € 372.00

Signed on behalf of Waterford City Council

Date _____

SCHEDULE B: Emission Limits

B.1 Emissions to Air

Dust Deposition Limits:

Measured at the monitoring points D1-D3 shown on Drawing No. 2004-115-05-Fig7 (or as may be amended under Condition 6.6).

Level (mg/m ² /day) <small>Note 1</small>
350

Note 1: 30 day composite sample with the results expressed as mg/m²/day.

B.2 Emissions to Water

There shall be no Emissions to Water of environmental significance.

B.3 Emission to Sewer

Emission Point Reference No.: FW1

Location: As per Figure B.2.c (Revision 1a)

Volume to be emitted: Maximum in any one day: 2.5 m³

Parameter	Emission Limit Value	
Temperature	18°C (max.)	
pH	6 - 9	
	mg/l	kg/day
BOD	400	1.0
COD	1,100	2.7
Suspended Solids	300	1.0
Oils, Fat Grease	10	0.5
Conductivity	1500	--
MBAS	0.2	--

