

Grainne Oglesby

From: Grainne Oglesby
Sent: 16 November 2017 16:00
To: Section99 (Section99@water.ie)
Subject: Attention Mr Ronan Connolly, - EPA Section 99(E) notification for response please
Attachments: Section 99(E) notice - W0211-02.docx

Dear Ronan,

Please find attached Section 99(E) notification for your response please ?

Kind regards,

GRAINNE OGLESBY,
PROGRAMME OFFICER,
ENVIRONMENTAL LICENSING PROGRAMME,
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Environmental Protection Agency, Ireland - www.epa.ie



Mr R Connolly
Environmental Policy & Licensing Support Specialist
Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

16 November 2017

Reg No: W0211-02

Dear Mr. Connolly

I am to advise you that the Agency has received an application from ERAS ECO Limited, Foxhole, Youghal, County Cork, for an Industrial Emissions licence review.

The applicant proposes as part of his application to provide for the discharge of process effluent to your sewer. Process effluent includes trade effluent and other matter (other than domestic sewage or storm water). **Details of the proposed emissions to the sewer are contained in Section E.3 of the application form which can be viewed by searching for a licence application at <http://www.epa.ie/terminalfour/ippc/index.jsp>**

This being the case and in accordance with Section 99E of the Environmental Protection Agency Act 1992, as amended, I am to request your consent to the proposed discharge. I should also add that in accordance with the requirements of the EPA Act, your consent may be subject to such conditions as Irish Water considers appropriate. Your attention is drawn to paragraph (4) of the attached copy of the relevant section of the EPA Act 1992, as amended. For your convenience please find attached a reply form including a list of draft conditions compiled by the Agency.

In accordance with paragraph (2) of this section of the Act, you are requested to forward your response **within 5 weeks of the date of this letter**. Please note that any decision given after the expiry period shall be invalid and in those circumstances the Agency may proceed to grant the licence concerned as if consent was obtained. Magnus Amajirionwu is dealing with this matter and can be contacted at the Environmental Licensing Programme of the Agency, Tel. No. 053-9160600 if you have any queries.

Again, your co-operation in this matter is appreciated.

Yours sincerely,

Gráinne Oglesby
Programme Officer
Environmental Licensing Programme
Office of Environmental Sustainability

IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility:

Reg. No:

Location Address:

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.

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 (Yes/No)
<p>1. No alteration to, or reconstruction in respect of, the activity, or any part thereof, that would, or is likely to, result in a material change or increase in:</p> <ul style="list-style-type: none"> i. the nature or quantity of any emission; ii. the abatement/treatment or recovery systems; iii. the range of processes to be carried out; iv. the fuels, raw materials, intermediates, products or wastes generated, or any changes in: <p>site management, infrastructure or control with adverse environmental significance;</p> <p>shall be carried out or commenced without prior notice to, and without the agreement of, the Agency.</p>	
<p>2. 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 from 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.</p>	
<p>3. The licensee shall establish, maintain and implement (text highlighted in black bold for new licences only) / maintain and implement (text highlighted in green bold for reviews only) a detailed programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment.</p>	
<p>4. Silt Traps and Oil Separators</p>	

<p>The Licensee shall, within six months of date of grant of this licence, install and maintain silt traps and oil separators at the facility/installation <<EPA to select as appropriate>>.</p> <p>5. Silt traps to ensure that all storm water discharges, other than from roofs, from the facility/installation pass through a silt trap in advance of discharge; 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>></p> <p>a. The silt traps and separator shall be in accordance with I.S. EN-858-2: 2003 (separator systems for light liquids).</p>	
<p>6. No specified emission from the installation shall exceed the emission limit values set out in <i>Schedule B: Emission Limits</i>, of this licence. There shall be no other emissions of environmental significance.</p>	
<p>7. 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 Irish Water.</p>	
<ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> ○ Sampling and analysis shall be undertaken by competent staff in accordance with documented operating procedures. ○ Such procedures shall be subject to a programme of Analytical Quality Control using appropriate control standards with evaluation of test responses. ○ Where any analysis is sub-contracted it shall be outsourced to a competent laboratory. 	
<p>8. Monitoring and analysis equipment shall be installed, operated and maintained as necessary, so that all monitoring accurately reflects the emission/discharge.</p>	
<p>9. In the event of any incident which relates to discharges to sewer having taken place, the licensee shall notify Irish Water and the Local Authority, in the manner prescribed by Irish Water, as soon as practicable after such an incident.</p>	
<p>10. The licensee shall pay to Irish Water 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, treatment, monitoring, sampling and analysis costs. Payment is to be made on demand from Irish Water.</p>	
<p>11. The licensee shall ensure that any trade effluent generated from canteen activities shall pass through appropriate grease removal equipment prior to discharge to sewer. <i>Inclusion of note in Schedule C Control of Emissions to sewer</i> Note: Grease removal equipment shall comply with EN or PDI standards or as otherwise specified by Irish Water.</p>	
<p>12. 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 Irish Water and the Local Authority in a manner and timeframe as may be specified by Irish Water.</p>	
<p>13. The licensee shall conclude an End User Agreement with Irish Water. <i>(End user Agreement to be inserted into the glossary: An agreement between the licensee and Irish Water which provides for the contractual conditions and arrangements (outside the terms and conditions set out in this licence) relating to the acceptance of, and treatment by, Irish Water of the licensee's trade effluent and wastewater.)</i></p>	

ADDITIONAL GENERAL CONSENT CONDITIONS In respect of discharges or emissions to sewers, in accordance with Section 99E of the Environmental Protection Agency Act 1992, as amended. <i>(Specify, if required)</i>	

Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Emission point reference no: _____

Emission to (sewer description): _____

Volume to be emitted: Maximum in any one day : _____ m³
 Maximum rate per hour : _____ m³

Parameter <i>(delete parameters which are not applicable)</i>	Emission Limit Value	
	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD		
COD		
Suspended Solids		
pH		
Temperature		
ADDITIONAL PARAMETERS <i>(if required)</i>		

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission point reference no: _____

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

Control of Emissions to Sewer

Description of treatment:

Control Parameter	Monitoring	Key Equipment

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 Irish Water.

Signed on behalf of

Section 99E of the Environmental Protection Agency Act 1992, as amended

99E.-(1) Where the Agency proposes to grant a licence (including a revised licence) which involves a discharge of any trade effluent or other matter (other than domestic sewage or storm water) to a sewer, it shall obtain the consent of the sanitary authority in which the sewer is vested, or by which the sewer is controlled, to such a discharge being made.

(2) Where consent is sought in accordance with subsection (1), the Agency may specify a period (which period shall not in any case be less than 4 weeks from the date on which the consent is sought) within which the consent may be granted subject to, or without, conditions or refused; any consent purporting to be granted (whether subject to or without conditions)

after the expiry of that period, or any decision given purporting to refuse consent after that expiry, shall be invalid and in those circumstances the Agency may proceed to grant the licence concerned as if the requirements of subsection (1) had been satisfied.

(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.

(5) A sanitary authority may request the Agency to review a licence or revised licence to which this section relates-

(a) at intervals of not less than 3 years from the date on which the licence or the revised licence is granted, or

(b) at any time with the consent, or on the application, of the person making, causing or permitting the discharge, or

(c) at any time if-

(i) the sanitary authority has reasonable grounds for believing that the discharge authorised by the licence or revised licence is, or is likely to be, injurious to public health or is likely to render the waters to which the sewer concerned discharges unfit for use for domestic, commercial, industrial, fishery (including fish-farming), agricultural or recreational uses or is, or is likely to be otherwise, a serious risk to the quality of the waters,

(ii) there has been a material change in the nature or volume of the discharge,

(iii) there has been a material change in relation to the waters to which the sewer concerned discharges, or

(iv) further information has become available since the date on which the licence or revised licence was granted relating to polluting matter present in the discharge concerned or relating to the effects of such matter, and the Agency shall consider and may comply with such request and shall have regard to any submission on the matter received from the sanitary authority.

(6) In this section, a reference to a sanitary authority shall be construed as including a reference to any person acting on behalf of or jointly with a sanitary authority.