

## Licence Alteration Request

Alteration Details	
Licence	<b>W0304-01      Packaging Laundry Limited</b>
Licensee	Packaging Laundry Limited
Title of Alteration	<b>Change to Emission to Sewer ELVs</b>

### Screening Report

No.	Question	Answer
1	Does the proposed alteration require a new class of activity or process?	No
2	Does the proposed alteration cause a new / additional main emission point?	No
3	Does the proposed alteration increase the total specified emissions for any emission parameter? <b>significantly</b> ?	Yes
4	Does the proposed alteration increase <b>significantly</b> the overall total emission from the installation/facility?	Yes
5	Does the proposed alteration involve development or proposed development that has already been granted planning permission or requires a grant of planning permission and was/is subject to EIA by the Planning Authority or An Bord Pleanála?	No
6	Did the proposed alteration require the preparation of a Natura Impact Statement (NIS) for consideration by any Planning or Public Authority?	No
7	Does the proposed alteration indicate that the EPA should conduct an Appropriate Assessment (on foot of a screening for Appropriate Assessment)?	No
8	Does the proposed change conflict with BAT as set out in the relevant BAT Conclusions? See <a href="#">here</a>	No
9	Does the proposed alteration adversely affect the energy efficiency of the installation/facility?	No
10	Does the proposed alteration adversely affect the environmental risk of the installation/facility <b>significantly</b> ?	No

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11	Does the proposed alteration cause an increase above the capacity limitations specified in the licence?	No
12	Does the proposed alteration require an extension of operating hours (where controlled by the licence) for an installation/facility where the public is likely to have an interest in such an extension?	No
13	Does the proposed alteration involve the incineration or co-incineration of waste materials displaying hazardous properties that were not previously authorised (as per the WID/IED)?	No
14	Does the proposed alteration introduce materials or techniques which adversely alter the probability, magnitude and duration or complexity of the site transboundary impact?	No
15	Does the proposed alteration constitute a substantial change?	No
16	Does the proposed alteration regularise an on-going breach of a licence condition?	No
17	Does the proposed alteration require a change to a condition or schedule of the Licence?	No

### Recommendation

Based on your responses to the forgoing questions the recommended option is for you to submit a 'Licence Review' application for this proposed alteration.

To progress this request you are required to go to the EPA website ([www.epa.ie](http://www.epa.ie)), complete the relevant Licence Application Form and follow the licensing application process. The application should be submitted to the EPA as specified in the licence application form or any associated instructions for applicants.

Recommendation Date: 22/05/2021

### Clerical or Technical Amendment Application Details

#### Proposed Alteration Description

Following consultation with Irish Water (see attached letter of agreement), Packaging Laundry Limited is seeking the following minor changes to Schedule B.3. Emissions To Sewer for Emission Point, SE1.

Parameter W0304-01 Existing Revision Sought

BOD (mg/l)	1000	1500
COD (mg/l)	3000	4500
Vol to be emitted (max. in one day)	5m <sup>3</sup>	10m <sup>3</sup>

The proposed change has been assessed by Irish Water who in a letter dated 27 April 2021 has confirmed its support for this change.

Regards,  
Malcolm Dowling

<b>Priority</b>	2. High
<b>Category of Amendment</b>	(c) Otherwise facilitating the operation of the licence (or certificate) and the making of the amendment does not result in the relevant requirements of section 83(5) of the EPA Act as amended/ section 42B(1) of the Waste Management Act as amended/environmental requirements ceasing to be satisfied

#### Licence Condition Changes

Condition / Schedule Reference	Current Condition / Schedule Wording	Suggested New Wording
Schedule B.3	Emission Point Reference No.: SE1 Location: Boghall Road, Bray, Co. Wicklow  Volume to be emitted: Maximum in any one day: 5 m3 Maximum rate per hour: 0.5 m3	Emission Point Reference No.: SE1 Location: Boghall Road, Bray, Co. Wicklow  Volume to be emitted: Maximum in any one day: 10 m3 Maximum rate per hour: 1m3
Schedule B.3	BOD, 5 days with Inhibition (Carbonaceous BOD)  ELV Concentration (mg/l): 1,000 Load (kg/day): 5	BOD, 5 days with Inhibition (Carbonaceous BOD)  ELV Concentration (mg/l): 1,500 Load (kg/day): 15
Schedule B.3	COD - Cr ELV Concentration (mg/l): 3,000 (kg/day): 15	COD - Cr ELV Concentration (mg/l): 4,500 (kg/day): 45

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### Questions

Q1	Is planning permission required to support the proposed alteration?	No
Q2	Does the application involve an installation boundary change?	No
Q3	Does the application involve changes to emissions to sewer?	Yes
If 'Yes', please attach Irish Water agreement for changes to emissions to sewer here If 'Yes', please attach Irish Water agreement for changes to emissions to sewer here		Letter of Feasibility IW.pdf
If 'Yes' for an Industrial Emissions Licenced activity, please provide evidence that an equivalent level of protection for the environment as a whole is guaranteed (section 86A (8))		
This is for waste licence activity. Changes sought are minor and relate solely to Schedule B - emissions to sewer. Following consultation, Irish Water has confirmed support for these alterations.		
Q4	Attach Appropriate Assessment Screening Report here	AA Screening Report.pdf

### Additional Documentation

### Final Declaration

<b>Name</b>	Malcolm Dowling
<b>Position</b>	Principal Environmental Consultant

### Application Details

<b>Selected by:</b>	Malcolm Dowling	<b>Selected date:</b>	22/05/2021
<b>Submitted by:</b>	Malcolm Dowling	<b>Submitted date:</b>	24/05/2021