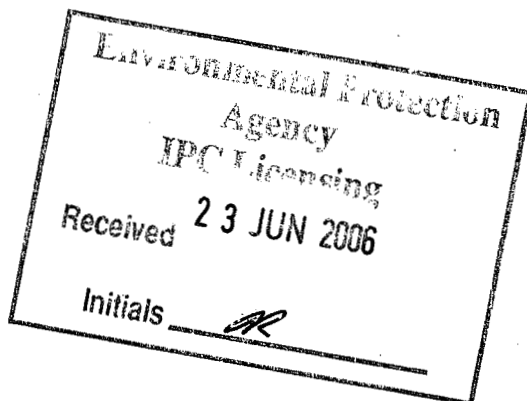




Dún Laoghaire-Rathdown
County Council Comhairle Contae
Dhún Laoghaire-Ráth an Dúin

County Hall, Dún Laoghaire, Co. Dublin, Ireland
Halla an Chontae, Dún Laoghaire, Co. Átha Cliath, Éire
Tel: 01 205 4700 Fax: 01 280 6969 Web: www.dlrcoco.ie



Environment Department
An Rannóg Comhshaoil

Water Services
Paul Buggy
Senior Executive Engineer
Direct Tel: 01 2054814
Fax: 01 2047939
pbuggy@dlrcoco.ie

Dr Karen Creed,
Environmental Protection Agency,
Licensing Unit,
Office of Licensing and Guidance,
Headquarters PO Box 3000,
Johnstown Castle Estate,
County Wexford

21st June 2006

Re: Pfizer Ireland Pharmaceuticals IPC Licence Review

Dear Karen,

I refer to the EPA's letter dated 20th April 2006 and to additional information in relation to this review sent by Noeleen Roche dated 24th April 2006. Dun Laoghaire Rathdown County Council's Consent Report is attached. I trust that it is to your satisfaction.

Yours truly

Paul Buggy
Senior Executive Engineer
Drainage Operations

EPA

Main File ☒

Public File ☒

Evaluation File ☒

Date 27.6.06 Wig.



Sanitary Authority Consent Report

Local Authority	Dun Laoghaire-Rathdown County Council
Applicant	Pfizer Ireland Pharmaceuticals
Registered Office:	Pottery Road, Dun Laoghaire, Co. Dublin.
Location of Premises:	As above.
Activity giving rise to discharge:	Process and Utilities Wastewater
Process/Manufacturing	Pharmaceutical Sterile Plant

The Environmental Protection Agency is reviewing an IPC licence granted to Pfizer Ireland, and in accordance with Section 99E of the Environmental Protection Agency Act, 1992 and 2003 consent is required from Dun Laoghaire-Rathdown County Council to allow the above named company discharge trade effluent to the Shanganagh main sewer at Deansgrange Park, (Little Meadow) County Dublin.

A licence was first issued to Pfizer (former Warner Lambert) under the Local Government (Water Pollution) Act, 1977-1990 in 1982 by the former Dublin County Council. Warner Lambert applied to the Environmental Protection Agency in 1994 for an IPC licence. This licence was sought under class designation 5.6 of the first schedule of the EPA Act, 1992.

The company were taken over by the Pfizer Group approximately 7 years ago and employ around 240 persons on site. The company manufacture a range of pharmaceutical products for medical purposes. The process involves Bovine serum extraction. Trade effluent is generated from a mixture of pharmaceutical process wastewaters such as, wash-down, cooling water and backwash from purification system. Effluent from the process is collected in a pH-balancing tank before discharge to the sewer system.

The maximum daily discharge set in the current IPC is 400 cubic metres per day. Figures from the company indicate a much lower figure of around 190 cubic metres per day presently being discharged. The review application from Pfizer requests a daily increase of 247 cubic metres. This consent would require a daily discharge of 450 cubic metres.

No order was made under **Section 22 of the Local Government (Water Pollution) Act, 1977-1990**, nor is there any need to currently change this status. (Power to declare a combined drain to be sewers for certain purposes)

SANITARY AUTHORITY CHARGES

In compliance with Section 16 of the Local Government (Water Pollution) Act, 1977 as amended by the Local Government (Water Pollution) (Amendment) Act, 1990 the following charges are levied:

Effluent Cost

The Licensee shall pay for trade effluent discharged to Dun Laoghaire-Rathdown Council's sewer system on the basis of metered water supply to the licensee's premises, or other approved metering arrangements agreed with the Council's Water Pollution Section, for the disposal of trade effluent. Charges are based on a combination of volume and strength using standard water industry methodology to determine the charge per cubic metre, i.e. the Mogden Formula method of calculation.

Monitoring Cost

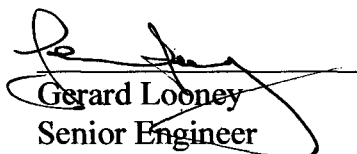
The Licensee shall also pay €1440.00 per annum towards the cost of sample collection, monitoring and analysis to Dun Laoghaire-Rathdown County Council. These charges will be revised annually by Dun Laoghaire-Rathdown County Council having regard to the cost of providing maintenance of main drainage and ancillary works.

I recommend that consent be given to discharge effluent to the Council's sewer in accordance with the Sanitary Authority Charges and attached Central Laboratory report.



Paul Buggy

Senior Executive Engineer



Gerard Looney
Senior Engineer

SANITARY AUTHORITY RESPONSE

Name of Sanitary Authority : Dun LaoghaireRathdown County Council

*Address : Town Hall,
Marine Road, Dun Laoghaire.
County Dublin*

*Name of Facility : Pfizer Ireland Pharmaceuticals
Pottery Road,
Dun Laoghaire,
Co.Dublin.*

IPPC Register Number: 750

Consent granted subject to the consent conditions outlined below	Yes
---	------------

CENTRAL LABORATORY CONSENT CONDITIONS

GENERAL CONSENT CONDITIONS WW-D1	Condition to be included (Yes/No)
1. No specified emission to sewer shall exceed the emission limit value <u>or load</u> set out in Schedule B : <i>Emission 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 set out in <i>Schedule C</i> .	Yes
3. Monitoring and analyses equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge.	Yes
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 trade effluent and to take samples of the process effluent.	Yes
5. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activities are being carried out 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 alternate 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.	Yes
6. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.	Yes
7. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and off-site points as required by the Agency.	Yes
8. No substance shall be present in such concentrations as would constitute a danger to sewer maintenance personnel working in the sewerage system or would be injurious to the construction of the sewer or would interfere with the operations of a downstream wastewater treatment works.	Yes
9. No substance shall be discharged in a manner, or at a concentration which	Yes

after initial dilution in the receiving waters to which the Sanitary Authority sewage is discharged , causes tainting of fish or shellfish.	
10. No emission to sewer shall take place which gives rise to any reaction within the sewer or to the liberation of by-products which may be of environmental significance.	Yes
11. The licensee shall ensure that the effluent shall not contain petroleum hydrocarbons or organic solvents (including chlorinated organic solvents) which would give rise to flammable or explosive vapours in the sewer.	Yes
12. A summary report of the results of analysis of effluent discharged to the sewer <u>with relevant volumes discharged</u> shall be forwarded to the sanitary authority on a quarterly basis.	Yes
13. Non-trade effluent wastewater (e.g. firewater, accidental spillages) which occurs on site shall not be discharged to the sewer without the prior authorisation of Dun Laoghaire Rathdown County Council.	Yes
14. 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.	Yes

ADDITIONAL GENERAL CONSENT CONDITIONS	
15. A log detailing the usage of all cooling water and boiler water treatment chemicals shall be kept by the Licensee and submitted to Dun Laoghaire Rathdown County Council on an annual basis.	
16. Best available technology (BAT) for the relevant Class 5.16 (Use of a Chemical or Biological process for the production of basic pharmaceutical products) shall be used to prevent, minimise, manage and treat pollutants in the wastewater stream discharging to foul sewer under this consent.	
17. The Licensee shall maintain or have maintained the on-site effluent treatment systems.	

Limit Values for Trade Effluent to Sewer

Schedule B - Emissions to Sewer

Emission point reference no: **SE-1 (8)**

Emission to (sewer description): **Pottery Road**

Grid Reference : **O 323488E, 225965N**

Volume to be emitted: Maximum in any one day : **450.0 m³**
 _____ Maximum rate per hour : _____ m³

Parameter	Emission	Limit Value		Parameter to be limited (Yes/No)
	Grab	Daily Mean	Daily Mean	
	Sample (mg/l)	Concentration (mg/l)	Loading (kg/day)	
BOD	500	300	135.0	Yes
COD	1000	600	270.0	Yes
Suspended Solids	500	400	180.0	Yes
Sulphates (as SO ₄)	800	500	225.0	Yes
Fats, Oils, Grease	200	200	90.0	Yes
PH	6 - 10	6 - 10	-	Yes
Temperature	42 degrees C	42 degrees C		Yes

ADDITIONAL PARAMETERS

Phosphates (as PO ₄ -P)	100	50	22.5	Yes
Zinc (as Zn)	5	5	2.25	Yes

Frequency of Monitoring Trade Effluent to Sewer

Schedule C

Emission point reference no: SE-1 (8)

Parameter	Monitoring Frequency	Sampling Method/Type (grab, continuous)
Flow to sewer	Continuous	Continuous
BOD	Monthly	24 hour composite sample
COD	Monthly	24 hour composite sample
Suspended Solids	Monthly	24 hour composite sample
Sulphates (as SO ₄)	Monthly	24 hour composite sample
Fats, Oils, Grease	Monthly	24 hour composite sample
pH	Continuous	Continuous
Temperature	Continuous	Continuous

ADDITIONAL PARAMETERS

(if required)

Phosphates (as PO ₄ -P)	Monthly	24 hour composite Sample
Chloride	Monthly	24 hour composite Sample
Total Nitrogen	Monthly	24 hour composite Sample
Total Phosphorus	Monthly	24 hour composite Sample
Organic Compounds*	Quarterly	24 hour composite Sample
Toxicity (Freshwater Aquatic)	Quarterly	Grab Sample
Toxicity (ISO 8196) Activated Sludge	Quarterly	Grab Sample

* Screening for Priority Pollutant List Substances. This analysis shall include those organic solvents in use in the processes, which are likely through normal process operations, to be discharged to the wastewater stream being discharged to sewer.

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of trade effluent	
Payment Frequency	
Annual Monitoring Costs	Euro 1524.00

Signed on behalf of Central Laboratory: Imelda Averill ✓
Imelda Averill,
Senior Executive Scientific Officer.
09/06/06

Denis Morrissey
Denis Morrissey,
Senior Scientific Officer.
09/06/06

For inspection purposes only
 Consent of copyright owner required for any other use.