

# Comhairle Contae Chorcaí Cork County Council

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Environmental  
Protection Agency

01 DEC 2006

Subject :IPC Reg. No. P0136-03 Pfizer Overseas Pharmaceuticals and CP Pharmaceuticals International C.V. trading as Pfizer Ireland Pharmaceuticals, Little Island Co. Cork

29<sup>th</sup> November 2006

Dear Ms McGuire ,

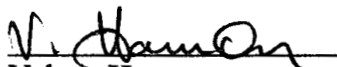
I wish to acknowledge receipt of the correspondence regarding the sanitary Authority response to Section 99 regarding a consent to discharge in relation to the above named premises.

The completed section 99 with respect to IPPC Reg No.P0136-03 is attached to this letter. Cork County Council are agreeable to discharge limits as set out in the attached Section 99 request provided that there are no increase in volumes from those specified in the review application.

Should you have any queries or clarification my contact details are supplied below

Phone no. 021-4532700  
E mail [valerie.hannon@corkcoco.ie](mailto:valerie.hannon@corkcoco.ie)

Yours Sincerely

  
Valerie Hannon,  
Executive Scientist  
Wastewater Laboratory





Environmental Protection Agency  
An Ghníomhaireacht um Chaomhnú Comhshaoil

Environment Directorate  
Cork County Council  
Inniscara  
Cork  
Attn: Ms Patricia Power, Director of Environment

Headquarters, PO Box 3000  
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LoCall: 1890 33 55 99

**Attention: Director of Services (with responsibility for Sanitary Services Section)**

25 October 2006

Reg No: P0136-03

Dear Ms Power

I am to advise you that the Agency has received an application from Pfizer Overseas Pharmaceuticals and C.P. Pharmaceuticals International C.V. (a limited partnership represented by and acting through Pfizer Manufacturing LLC and Pfizer Production LLC) trading as Pfizer Ireland Pharmaceuticals, Little Island, Cork, for an Integrated Pollution Prevention and Control (IPPC) licence.

The applicant proposes as part of his application to provide for the discharge of process effluent to the sanitary authority's sewer. Process effluent includes trade effluent and other matter (other than domestic sewage or storm water). Details of the proposed emissions to the sanitary authority's sewer are contained in the application form.

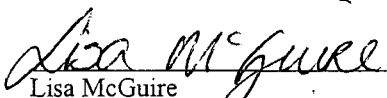
I would appreciate it if you could confirm whether or not an Order under Section 22 of the Local Government (Water Pollution) (Amendment) Act, 1990, was made and confirmed by your Council, and if so, could you please furnish the Agency with a copy of same.

This being the case and in accordance with Section 99E of the Environmental Protection Agency Acts 1992 and 2003, I am to request your consent to the proposed discharge. To this end, I enclose the relevant section of the application form. I should also add that in accordance with the requirements of the EPA Acts, your consent may be subject to such conditions as the authority considers appropriate. Your attention is drawn to paragraph (4) of the attached copy of the relevant section of the Act, 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. Sean O'Donoghue is dealing with this matter and can be contacted at the Licensing Unit of the Agency, Tel. No. 021 4875540 if you have any queries.

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

Yours sincerely

  
Lisa McGuire  
Office of Licensing & Guidance



## SANITARY AUTHORITY RESPONSE

*Name of Sanitary Authority: Cork County Council*

*Address: Inniscara  
Cork  
Attn: Ms Patricia Power, Director of Environment*

*Name of Facility: Pfizer Overseas Pharmaceuticals and C.P. Pharmaceuticals International  
C.V. (a limited partnership represented by and acting through Pfizer  
Manufacturing LLC and Pfizer Production LLC) trading as Pfizer Ireland  
Pharmaceuticals IPC Reg. No:P0136-03*

*Address: Little Island  
Cork*

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

Consent granted subject to the consent conditions outlined below.	Yes
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.	Yes
2. The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as 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 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.	Yes
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.	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. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing that 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
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.	Yes

ADDITIONAL GENERAL CONSENT CONDITIONS  
In respect of discharges or emissions to sewers, in accordance with Section 99E  
of the Environmental Protection Agency Acts 1992 and 2003  
(Specify, if required)

Charging for Effluent treatment and mechanisms  
for charging are subject to review when final  
decisions on charging are agreed by  
Cork Co. Council with respect to Carrigrohane  
Wastewater treatment plant

The proposal in 1.2.2. of Attachment E3 is  
acceptable to Cork Co. Council provided that  
there will be no resulting increase in the  
volume of discharge from the site. The diversion  
proposed shall not increase in the volume of  
discharge from the site and there shall be no  
agreed increase in volume of discharge from the site.

**Limit Values for Process Effluent to Sewer**

*Schedule B: Emission Limits*

Emission point reference no: PW1

Emission to (sewer description): CCC Southern End Site

Volume to be emitted : Maximum in any one day : 1000 m<sup>3</sup>  
 Maximum rate per hour : 100 m<sup>3</sup>

Parameter (delete parameters which are not applicable)	Emission Limit Value	
	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD	500	300
COD	2500	600
Suspended Solids	300	100
pH	6.5 to 8.5	
Temperature	30°C	
<b>ADDITIONAL PARAMETERS</b> (if required)		
Ammonia as N	10 mg/l	
Total Phosphorus as P	50 mg/l	
Total Nitrogen as N	100 mg/l	
Total Heavy Metals	0.5 mg/l	
Sulphate	1000 mg/l	
Detergents	5 mg/l	
Fats, Oil, Grease	20 mg/l	

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission point reference no: PW1

Parameter (delete parameters which are not applicable)	Monitoring Frequency (e.g. monthly, quarterly, annually)	Sample Type (grab, composite)
Flow to sewer	Continuous	-
Temperature	Daily	-
pH	Daily	Composite
BOD	Monthly	Composite
COD	Weekly	"
Suspended Solids	Weekly	"
<b>ADDITIONAL PARAMETERS</b> (if required)		
Ammonia	Monthly	Composite
Total Phosphorus	Monthly	"
Total Nitrogen	Monthly	"
Total Heavy Metals	Annually	"
Sulphates	Monthly	"
Detergents	Annually	"
Fats, oil, Grease	Monthly	"
V.O.C	Monthly	"

Note (no ENV limit set for VOC)

Signed on behalf of Sanitary Authority: V. Haman

Exec Scientist. (22/1/06)

For Both. PW1 + SI.

Annual Monitoring costs £800/year.

Treatment charges to be set as per polluter pays principle of Water Services CCC. Treatment charges

to be levied by C.C.C.

**Limit Values for Process Effluent to Sewer**

**Schedule B: Emission Limits**

Emission point reference no: S1

Emission to (sewer description): CCC Sewer Northern End Site.

Volume to be emitted : Maximum in any one day : 750 m<sup>3</sup>  
 Maximum rate per hour : 80 m<sup>3</sup>

Parameter (delete parameters which are not applicable)	Emission Limit Value	
	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD	200	150.
COD	1000	750
Suspended Solids	500	375
pH	6.5 - 8.5	
Temperature	30°C	
<b>ADDITIONAL PARAMETERS</b> (if required)		
Ammonia - N	10 mg/l	
Total Phosphorus - P	50 mg/l	
Total Nitrogen - N	120 mg/l	
Total Heavy Metals	0.5 mg/l	
Sulphates	1000 mg/l	
Detergents	5 mg/l	
Fats, Oil, Grease	20 mg/l	

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission point reference no: 51

Parameter (delete parameters which are not applicable)	Monitoring Frequency (e.g. monthly, quarterly, annually)	Sample Type (grab, composite)
Flow to sewer	Continuous	-
Temperature	Daily	-
pH	Daily	-
BOD	Monthly	Comp
COD	Weekly	Comp
Suspended Solids	Weekly	Comp
<b>ADDITIONAL PARAMETERS</b> (if required)		
Ammonia	Monthly	Composite
Total Phosphorus	Monthly	u
Total Nitrogen	Monthly	u
Total Heavy Metals	Annually	u
Sulphate	Monthly	u
Detergents	Annually	u
Fats, Oil, Grease	Monthly	u
V. O. C.	Monthly	u

Note (no env limit for voc)

Signed on behalf of Sanitary Authority: V. Hamon

Free Scientist

29/11/06