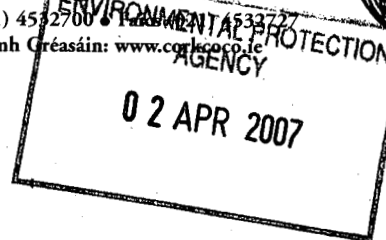


Comhairle Contae Chorcaí Cork County Council

Noeleen Roche
Office of Licencing and Control
Environmental Protection agency
Johnstown Castle Estate
County Wexford
Ireland

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Subject: IPPC Reg No. P0052-02 Cognis Little Island, Co. Cork)

29th March 2007

Dear Ms Roche ,

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 letter details the council's comments in relation to the applicant's objection to the IPPC licence which the agency are currently processing. Cork County Council wish to advise the agency that the council wish the agency to take this correspondence into account when determining the review application IPPC Register Number P0052-02 in respect of the Cognis Little Island site.

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

Phone no. 021-4532700

E mail valerie.hannon@corkcoco.ie

Yours Sincerely

Valerie Hannon,
Executive Scientist
Wastewater Laboratory

C.C. Kevin Sugrue Senior Engineer, Water Services, Cork County Council
C.C. David O'Keeffe Senior Executive Engineer, Water Services, Cork County Council
C.C. Eamonn Senior Engineer, Water Services, Cork City Council
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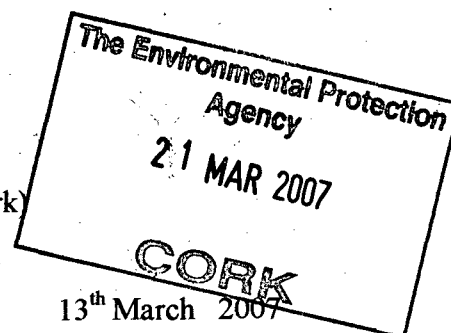
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AnnMarie Donlon ,
Office of Licencing and Control
Environmental Protection agency
Johnstown Castle Estate
County Wexford
Ireland

Subject :IPPC Reg No. P0052-02 Cognis Little Island, Co. Cork



Dear Ms Donlon ,

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 as previously issued by Cork County Council. Cork County Council wish the raise the above issues prior to the issuing of a determination by the agency

Following a recent meeting with the company the following changes were requested by the company and were agreed subject to the acceptance of the increased loadings by Cork City Council. Cork County Council have written to Cork City council with details of the revised proposals.

Issue No.1 The company requested the removal of a BOD limit on the consent.

Response from Cork County Council-we are not agreeable to the removal of this parameter as this parameter is essential for loading analysis for discharges to the adjacent wastewater plant.-no change on this issue however the permitted B.O.D. loading can be increased to 3000Kg/Day subject to the approval of Cork City Council

Issue No.2 The company requested a COD loading of 5000Kg /day.

Response from Cork County Council- previously a formal written agreement was reached between Cognis and Cork City Council with regard to loadings into Carrigrennan Wastewater Plant. We are awaiting a response from Cork City council but are agreeable to the proposed increase subject to receiving formal agreement from Cork City Council

Issue No.3 The company erroneously requested a Fats, Oil & Grease limit of 2.4Kg/day . A FOG limit of 20mg/l which is equivalent to 16Kg/Day was granted as this value of 20mg/l FOG does not generally present difficulties in sewers for the county council and the operators of treatment plants. The company have now requested a limit of 24Kg/day, which will have a parametric value of 30mg/l with an 800m3/day discharge from the premises.

Response from Cork County Council-we are not agreeable to an increase of 30mg/l of Fats Oil and Grease and furthermore this value is to be estimated in terms of emission limit values of mg/l rather than in mass emission values of Kg/day as requested by the company. -no change on this issue. The FOG limit is set at 20mg/l.

Issue no 4. The company had requested the use of mass emission value for all parameters instead of concentration limits

Response from Cork County Council - Cork County Council are not agreeable to this request.-no change



Issue no 5. The company have requested a Sulphate emission limit of 5000mg/l from the previous Section 99 limits of 1000mg/l of Sulphate.

Response from Cork County Council - Cork County Council will permit an interim arrangement of higher Sulphate limits up to but not exceeding 5000mg/l for a 2 year period until the 1st January 2009. Cork County Council are concerned with discharges that contain high levels of sulphates as these discharges can damage the integrity of a sewer. The variation in limits from those previously issued is strictly subject to pH control by the applicant and no discharges are permitted or allowed that are outside the pH range of 7.0 to 8.5 pH Units-no change in this provision

Issue No. 6 The company have requested that Total Heavy Metal testing be removed from the licence.

Response from Cork County Council - Cork County Council are not agreeable to this request as the test is required on an annual basis and is necessary to evaluate the discharge to sewer.-no change

Cork County Council further request that an ELV values be included in the determination to be issued by the agency for the following parameters

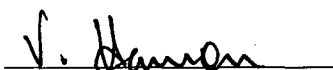
- a. Toluene - 10mg/l
- b. Aluminium -20mg/l
- c. Volatile Organic Compounds -15 mg/l

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

Phone no. 021-4532700

E mail valerie.hannon@corkcoco.ie

Yours Sincerely



Valerie Hannon,
Executive Scientist

Wastewater Laboratory

C.C. Kevin Sugrue Senior Engineer, Water Services, Cork County Council

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