



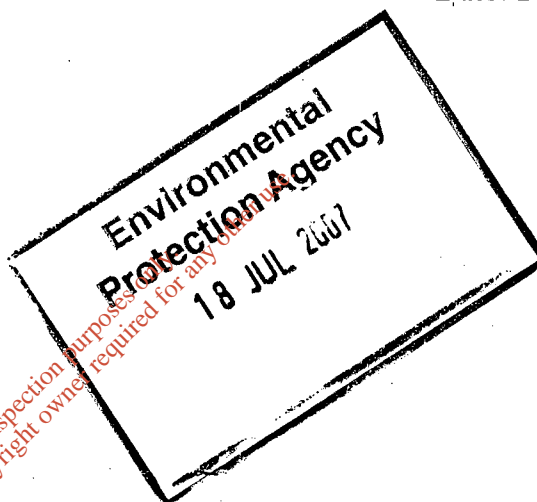
Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

*Environmental Health Service,
Local Health Office (Cavan/Monaghan)
PCCC Directorate,
Dublin/North East Area,
The Arcade,
Main St,
Cavan.*

*Tel: 049-437 3418
Fax: 049-437 3427*

*Ref. BMcK/FS
Date: 16/07/07*

Ms. Liz Leacy,
Office of Climate Change,
Licensing and Resource Use,
Environmental Protection Agency,
Head Quarters,
PO Box 3000,
Johnston Castle Estate,
County Wexford
Ireland



**RE: Reg. No. P0101-02
Proposed Review of IPC Licence from Norbrook Manufacturing Limited,
Rossmore Industrial Estate, Monaghan**

Dear Ms. Leacy,

I refer to your correspondence to Mr. Ray Mitchell, Director Regional Health Office, Health Service, Dublin North East, date 26/06/07.

This correspondence was received in this office on the 3rd July last.

We note that the proposed licence determination in Schedule B: B.3 states "There shall be no trace of hazardous substances in the effluent discharged". It also states in Schedule C: C.1.1 "There shall be no emissions to air of environmental significance".

We have also noted the content of the EPA inspectors report associated with this particular activity. This refers to the fact that there may be active ingredient waste collected from tank washings, dust collection filters, and from the purification process involving nano filtration and reverse osmosis.

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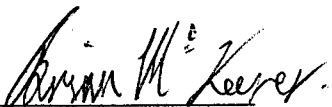


2.

The licence conditions appear to protect the public health aspects. However, the sampling and verification procedure used to confirm that active ingredient is not escaping to the environment gives cause for concern particularly having regard to item number 8 of the Inspector's report (i.e. Compliance Record).

The HSE has a strong public health concern regarding the development of acquired antibiotic resistance in the environment should traces of active antibiotic ingredient be continuously discharged to the sewer or the environment. For this reason a more robust verification procedure should be considered in relation to ensuring compliance with this particular condition.

Yours faithfully



Brian McKeever
Principal Environmental Health Officer

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