Comhairle Contae Chorcaí Cork County Council

Liz Leacy, Licencing Unit Office of Climate Change, Licencing and resource Use, **Environmental Protection Agency** Johnstown Castle Estate County Wexford Ireland

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Environmental **Protection Agency**

24 JUL 2007

21st July 2007

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

Dear Ms Leacy,

I wish to acknowledge receipt of the correspondence regarding the objections to the IPPC determination issued by the agency in respect of the above named facility. and the second of the second o

Section A -Objection by company

Cork County Council wish to respond to the objections that relate to the discharge to sewer in the operational area of Cork County Council by the applicant in the order that is outlined in the letter of objections dated 19th June 2007.

- a. C.3.2 (COD)-This proposal is acceptable to Cork County Council.
- b. B.3-Detergent limits are routinely set in licences that discharge to sewer in order to ensure compliance of discharges by Cork County Council from the relevant treatment plants in their functional area. These plants are treating the effluent prior to discharge to waters. The inputs to treatment plants are controlled in order to ensure that the treated effluent is compliant with the Phosphate regulations and the Dangerous substances regulations among other regulations. Cork County Council object to the total removal of the detergent parameter. Cork County Council are agreeable to the request by the company in respect of a time frame and the request to set the ELV value on that basis provided the level of detergent is not excessive and does not exceed a value of 50mg/l
- c. C.3.2 (Detergents)- the surfactants that require monitoring are the sum of the anionic surfactants and non-ionic surfactants and to the most prompted and the surfactants are the surfactants the surfactant are the surf र्म क्षेत्रक का प्रकार का प्रकार का कार्योप की पूर्व किंद्रिय के उन महारक्षक का विवेश मुख्य है हुआ का कि सम्माद

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Section B - Objection by Cork County Council

a. Temperature Limit for discharge to sewer

Cork County Council are agreeable to a temperature ELV of 32°C at the monitoring location of the final effluent monitoring point on the Pfizer site that relates to P0136-03 which is 150 metres upstream of the actual connection point. Cork County Council reserve the right to request a technical amendment of the section 99 consent. The discharge from the premises combines with discharges from other premises and Cork County Council are concerned that this may impact on the sewer network if the temperatures of any of the companies discharging to the sewer network are discharging effluents that are above ambient temperatures.

The applicant was required to perform VOC analysis of both the liquid effluent and the head space in the sewer above the effluent discharge location as part of this study. The liquid effluent results have not been received to date however the applicant monitored the headspace above the connection point of the final effluent discharge on the 12th July 2007. The headspace was monitored for a three minute period and no VOC were detected. Cork County Council request that this monitoring be repeated on a quarterly basis in order to assess the impact of the permitted temperature increase to sewer from the above licenced facility.

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

Executive Scientist, Environment Directorate,

Cork County Council.

c.c. Kevin Sugrue Senior Engineer, Water Services South Cork, Cork County Council

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