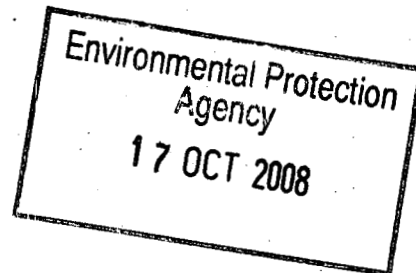


Comhairle Contae Chorcaí Cork County Council

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Marie Harris ,
Licencing Unit
Office of Climate, Licencing and Resource Use,
Environmental Protection Agency
HQ Box 3000
Johnstown Castle Estate
County Wexford
Ireland



15th October 2008

Subject :IPPC Reg. No. 0082-02 Micro-Bio(Ireland)Ltd Fermoy, Co. Cork-Objection by Company to proposed determination issued by EPA on 11th June 2008

Dear Ms Harris ,

Microbio have objected to a number of provisions of the section 99(E) response in the recent determination from the EPA.

The EPA requested a response and comments on this objection that relate to the conditions attached for the discharge to sewer from the site

Note that Objection Number 1,4 ,5 relate to matters that are under the control of the agency and as such will not be addressed by Cork County Council in our response to the objection.

Part A. Objection 2-Condition 3.14: Sanitary Effluent

The licensee shall provide and maintain a Wastewater Treatment plant at the installation for the treatment of sanitary effluent arising on-site.

The company discharges sanitary effluent to the Fermoy Town Council Treatment plant where the sanitary effluent is treated. The company requests that this condition be changed to read:

3.14 Sanitary effluent shall be discharged to the sanitary authority foul sewer.

Response to Part A- that Cork County Council have no issue with this change and the wording is acceptable to CCC.

IPPC Register number P0082-02

Cork Co. Council response to objections from Company to IPPC determination

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Part B. Objection 3 –Schedule of Emissions to sewer (Text from company below)

Objection 3-Schedule B.3 Emissions to Sewer:

The table reflects the proposed determination limits:

Parameter	Unit	ELV –Proposed Determination
Temperature	°C	20 max
Volume	m ³ /day	100 (note 1); 320 (Note 2)
Flow Rate	m ³ /hr	22
pH	-	6.5-8.0
Suspended Solids	mg/l	35
Sulphate	mg/l	3,000
Total Phosphorus (as P)	mg/l	0.5
Chlorine	mg/l	0.1
TOC	mg/l	20
Metals (As, Hg, Se, Cr, Cu, Pb, Ni, Ba, B, Zn)	mg/l	1
Chloride	mg/l	50,000
Total Dissolved Solids	mg/l	130,000
VOC (toluene, xylene, dichloromethane)	mg/l	1

In relation to the above table the following points are made:

Temperature: This is a parameter that the company has not been asked to monitor previously and needs to assess its ability to achieve this limit consistently. The company feels that it would be able to meet a limit of 25°C but that the limit of 20°C would be difficult to meet particularly during periods of prolonged high ambient temperature. A maximum of 25°C is therefore requested.

Volume: The company requests that the daily Volume limit remain at 320 m³ and is of the opinion that the proposed limit of 100 m³ is impractical. For instance external bunds have been provided for all Bulk Storage Tanks and Packed Products. The total floor area of the bunds is such that rainfall of 1" would result in a discharge from the bunds of 88 m³ which in addition to the average daily "process discharge" would result in the proposed limit being exceeded while normal operating conditions were adhered to.

pH: The company requests that the proposed range be increased from 6.5-8.0 to 6.5-8.5. This range the company feels can be achieved without changes to the WWTP System, however, the impact of the tighter range has not been assessed and could prove to be problematic.

Sulphate: There are three main sources of Sulphate in the discharge:

1. Sulphate from the Brine purge as there is Sulphate in the Salt when purchased.
2. Sulphate from Sodium Sulphite used for dechlorination (to ensure that the discharge is Chlorine free).
3. Sulphate from Sulphuric Acid used for neutralisation (the effluent is alkaline prior to neutralisation).

The company minimises sources 1, 2 and 3 and has only in the last few days switched to using Hydrochloric Acid for neutralisation. It is too soon to confirm that this change will result in lower Sulphate concentrations in the discharge and the company requests that the old limit remain in place until such time (~ 6 months) as the situation can be fully assessed at which stage the company should be in a better position to meet the new limit of 3000 mg/l.

Chloride: The company has undertaken a number of projects in the past to reduce both Chloride and Volume discharges. Work on both continues. The company is requesting the higher concentration limit so that, should any future volume reductions of a significant nature be achieved, then Chloride discharge concentrations would be closer to the limit and may have a negative impact on possible improvements in order not to breach the licence condition.

The requested change is as per the Table:

Parameter	Unit	ELV-Licensee Requested
Temperature	°C	25 max
Volume	m ³ /day	320
Flow Rate	m ³ /hr	As Proposed
pH	-	6.5-8.5
Suspended Solids	mg/l	As Proposed
Sulphate	mg/l	5,000; 3,000 after 6 months
Total Phosphorus (as P)	mg/l	As Proposed
Chlorine	mg/l	As Proposed
TOC	mg/l	As Proposed
Metals (As, Hg, Se, Cr, Cu, Pb, Ni, Ba, B, Zn)	mg/l	As Proposed
Chloride	mg/l	70,000
Total Dissolved Solids	mg/l	As Proposed
VOC (toluene, xylene, dichloromethane)	mg/l	As Proposed

Response to Part B.

1. **Temperature** – Response From Cork County Council – the company shall monitor temperature and the limit should be set for the May to September period with a level of 25°C . A limit of 20°C for all periods outside this time frame
2. **Volume** – Response From Cork County Council -primarily an issue for local area office as to capacity of pipe etc however the volume of 100m3 was part of the loading calculations used and the environment directorate are concerned that a large increase in volume without a consequential reduction in loading values may lead to potential water quality issues due to the high level of salts discharged at this location. The 2007 data submitted had a maximum daily average of 159.3 m3/day and in 2006 the daily maximum was 231.8m3/day both of which are well below a value of 320m3/day. The value above of 100m3/day is for process discharge and this is the metered requirement for the discharge to sewer and the bund value was not included in this response. A final volume of 230m3/day has been agreed with the local area office and Cork County Council are recommending that the volume limit be licenced at 230m3/day . If the volume limit is increased then a loading value will need to be included for all parameters.
3. **pH** – Response From Cork County Council- Cork County Council are agreeable to a pH licence limit of 6.5 -8.5 pH units however the applicant is required to submit a report after 12 months of issue of final determination which demonstrates the range and trend analysis of pH discharges from the above named facility.
4. **Sulphate** – Response From Cork County Council -the environment directorate would recommend that a 6 months time frame as proposed by the applicant be accepted however after that time a limit of 3000mg/l be set in the final discharge.
5. **Chloride** - Response From Cork County Council -Cork County Council would not be in favour of a limit of 70,000 mg/l of Chloride and recommend that the limit be unchanged at 50,000mg/l . On one part of the objection the applicant is requesting a volume increase to 320m3/day and in another part requesting an increase of significant discharge in chloride concentration in order to facilitate a reduction in the volume of discharge . In the absence of absolute loading limits this requested change cannot be agreed until the volume issue is resolved.

Part C. Objection 6-Schedule C.3.2 Monitoring of Emissions to Sewer

<i>Parameter</i>	<i>Monitoring/Frequency</i>	<i>Analysis Method/Technique</i>
TOC	<i>Continuous</i>	<i>On-Line TOC meter with recorder</i>

TOC was previously required to be measured quarterly and results indicate that the levels in the discharge are consistently < 5 mg/l.

The company requests that monitoring for this parameter be as follows:

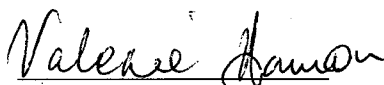
<i>Parameter</i>	<i>Monitoring/Frequency</i>	<i>Analysis Method/Technique</i>
TOC	<i>Quarterly</i>	<i>On-Line TOC meter with recorder</i>

Response to Part C.

Cork County Council requested monthly monitoring of this parameter (TOC) in the Section 99(E). The requirement for continuous monitoring was included by the agency as part of the proposed determination and as such is a matter for the agency. Cork County Council would not be agreeable to quarterly monitoring and had requested monthly TOC monitoring and would not be agreeable to a reduction to quarterly monitoring of the discharge.

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,
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Environment Directorate,
Cork County Council.

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c.c. Finbar O'Keeffe Staff Officer ,Environment Directorate ,Cork County Council

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