

S99E Reply on Objection



Ms Orla Harrington
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Date: 15th December 2014

Ref.: P0126-03 –Allergan objection to Irish Water conditions attached to the consent to discharge to sewer submitted under Section 99E of the EPA Act, as amended, as outlined in EPA letter dated 11th November 2014.

Dear Ms Harrington,

I refer to EPA letter of 11th November 2014 regarding the above.

Please find below Irish Water's comments in relation to the objections made by Allergan in accordance with article 25 of the Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013. In making the comments, Irish Water refer to points 6 and 7 of Allergan's letter dated 4th November 2014 and respond accordingly to each itemised objection raised-

6. Condition 11.7 Reporting to Irish Water

Irish Water propose the amendment of Condition 11.7 to read as follows;

"The licensee shall record all sampling, analyses, measurements, examinations calibrations and maintenance carried out in accordance with the requirements of its licence and all other such monitoring which relates to the environmental performance of the installation. A summary report (soft copy) of emissions to sewer shall be submitted to the Regional Wastewater Monitoring Compliance Liaison Specialist (RWMCLS), Connaught & Ulster Region, Irish Water (IW) on an annual basis. All exceedances to sewer above the permissible discharge limit to be notified to the RWMCLS as soon as is reasonably practicable. All correspondence to IW should be directed to WasteWaterComplianceConnaughtUlster@water.ie"

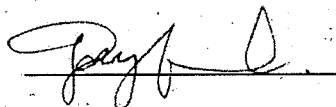
7. Schedule B.3 Emissions to Sewer

The EPA Proposed Determination Schedule B.3 emission limit value for mercury placed on the emissions to sewer at SE1 is 0.005mg/l. This is 10% of the limit specified in the Mercury Discharge Regulations (0.05mg/l). As part of the assessment of the application with regard to the Section 99E Response Irish Water examined Allergan's Annual Environmental Reports. The average daily measured value for Mercury reported by Allergan during 2013 was found to be 0.00008mg/l. It was decided that the daily mean loading in KG/day

could be reduced to 0.0035 kg/day as it is not foreseen that Allergan would be discharging consistently at the proposed maximum daily average ELV (0.005mg/l) or the proposed maximum daily flow (960m³). The proposed daily mean loading figure of 0.0035 kg/day also provides further protection to the Westport wastewater treatment plant and the resulting effluent discharge to Clew Bay in the unlikely event of an elevated discharge of mercury in the Allergan effluent. It would also result in reduced levels of mercury in the wastewater treatment plant sludge. The emission limit value for the discharge from the treatment plant (WWDA Register No D0055-01) is currently 0.0004mg/l for mercury.

Similarly, for Detergents (as lauryl sulphate), the EPA Proposed Determination Schedule B.3 emission limit value placed on the emissions to sewer at SE1 is 5mg/l. We examined Allergan's Annual Environmental Reports and the average daily measured value for Detergent reported by Allergan during 2013 was 0.16mg/l. It was decided that the daily mean loading in KG/day could be reduced to 3.5 kg/day and it would also provide further protection to the Westport wastewater treatment plant and the resulting effluent discharge to Clew Bay.

Yours sincerely,



Jerry Grant

Head of Asset Management

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Ann Kehoe

Subject: FW: P00126-03 Allergan Pharmaceuticals Ireland - Irish Water response to EPA 141215
Attachments: P00126-03 Allergan Pharmaceuticals Ireland - Irish Water response to EPA 141215.pdf

From: Ronan Connolly [mailto:rconnolly@water.ie]
Sent: 16 December 2014 17:12
To: Orla Harrington
Subject: P00126-03 Allergan Pharmaceuticals Ireland - Irish Water response to EPA 141215

Dear Ms Harrington,

Further to your letter dated 11th November 2014 concerning the objection received by the EPA from Allergan Pharmaceuticals Ireland, part of which relates to Irish Water's S99E submission, please note our comments by way of the attached letter dated 15th December 2014.

A signed hard copy will be posted today to :

Ms Orla Harrington
Environmental Licensing Programme,
Office of Climate Licensing & Resource Use
EPA Headquarters,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Should you have any further queries, please do not hesitate to contact me.

Kind Regards,


Ronan

Ronan Connolly
Environmental Policy and Licensing Support Officer

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