



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Protection
Agency
23 NOV 2015

Submission No. 1

Environmental Health Department,
Teach Laighne,
Humbert Street,
Tubbercurry,
Co. Sligo.

13th November 2015

Tel: 071 9185478

Fax: 071 9185472

Name: Ms. Noeleen Keavey, Programme Officer
Address: Office of Climate, Licensing and Resource Use, Johnstown Castle Estate, Co. Wexford
Re: Industrial Emissions Activity (IEA) License Review
Proposed Development; Application to the Environmental Protection Agency for a review of Industrial Emissions Activity (IEA) License Review P0643-03 for the purposes of Regulation 16 of the EPA (Industrial Emissions) (Licensing) Regulations 2013

Dear Ms. Keavey,

Please find enclosed the HSE consultation report in relation to the above proposal.

If you have any queries regarding this report, the initial contact is Ms. Rita O'Grady, Principal Environmental Health Officer who will refer your query to the appropriate person.

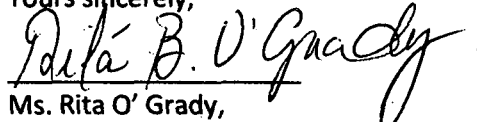
Environmental Health Report

The EH service response to the proposal is in the attached consultation report.

- The assessment is based solely on an assessment of documentation submitted to this office on the 17th September 2015 by Mr. Gavin McGuire, HSE Assistant National Directors Office.
- A site visit was conducted on the 6th November 2015.
- No additional investigations / measurements were undertaken.
- This report refers only to those sections of the documents which are relevant to the HSE.
- We have made observations and submissions under the following specific areas; Emissions from the facility through air, surface water and sewer as well as noise and waste.

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Ms. Rita O'Grady, Environmental Health Department, Ardaghowen, The Mall, Sligo. 071-9145132.

Yours sincerely,


Ms. Rita O'Grady,
Principal Environmental Health Officer



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Environmental Health Department,
Teach Laighne,
Humbert Street,
Lubbercurry,
Co. Sligo.

18th November 2015

Tel: 071 9185478
Fax: 071 9185472

HSE SUBMISSION REPORT

Environmental Health Service Consultation Report

Report to: Ms. Noeleen Keavey, Programme Officer

Address: Office of Climate, Licensing and Resource Use, Johnstown
Castle Estate, Co. Wexford

Re: Industrial Emissions Activity (IEA) License Review

Reference Number: P0643-03

Applicant: AbbVie Ireland NL B.V., Manorhamilton Road, Sligo

Proposed Development: Application to the Environmental Protection Agency for a review of Industrial Emissions Activity (IEA) License Review P0643-03 for the purposes of Regulation 16 of the *EPA (Industrial Emissions) (Licensing) Regulations 2013*

1. General Introduction

This report only comments on Environmental Health (EH) Impacts of the proposed development as outlined in this Environmental Report (ER) and the adequacy of the ER from an EH viewpoint. We have made observations and submissions on the following specific EH areas;

Emissions from the facility through air, surface water and sewer as well as noise and waste.

2. Description of the Project

AbbVie Ireland NL B.V. operates a pharmaceutical manufacturing facility outside Sligo town. The facility is a licensed, state of the art, high containment facility for the manufacture of a wide range of pharmaceuticals. AbbVie are applying to the EPA for a review of its industrial emissions licence to allow for the addition of chlorinated solvents to the schedule of solvents permitted under the current licence. The review is to include the operation of a new VOC (Volatile Organic Compound) abatement system in the form of a new thermal

oxidiser on site. This new thermal oxidiser will abate off-gases from processing activities. It will be able to treat both chlorinated and non-chlorinated waste gases.

Sources of Emissions:

- **Air** - The main emissions to the air will come from the thermal oxidiser, cryogenic condenser, scrubber, boilers and from dust exhaust systems.
- **Surface Water** – Through site storm water drainage system,
- **Sewer** – The main emissions to the sewer will come from sanitary wastewater, utility equipment and solvent and aqueous streams.
- **Noise** – The main emissions from noise will come from plant noise including air compressors, boilers and the thermal oxidiser.

3. Assessment of the Licence Application

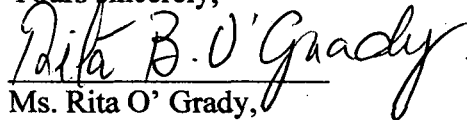
A site visit was carried out by Ms. Sara Doohan, Environmental Health Officer, accompanied by Mr. Donal O'Connor, Senior Environmental Health Officer, HSE West on the 6th November 2015. The officers met with Mr. Michael Gallagher, Production Manager for the AbbVie facility. Mr. Gallagher and his team escorted the officers around the site and explained the thermal oxidiser process and systems in place for monitoring emissions from the various discharge points to the air and water.

From the observations of Ms. Doohan and Mr. O'Connor during the site visit, the facility appeared to be very well managed and maintained to a high standard. All the existing main atmospheric emission points for the thermal oxidiser and the cryogenic condenser are provided with continuous emissions monitoring systems (CEMS) which have been approved by an approved certification body. The new thermal oxidiser is also equipped with an approved CEMS. There is a strict monitoring regime in place as required by the licence and all discharges from the facility, both to air and water are monitored and records are maintained and are available for inspection to the Agency.

4. Conclusion

Having inspected the facility and examined all available information, and subject to both existing and proposed emissions being in line with Condition 5 of the licence and the emission limit values set out in Schedule B of the licence, Ms. Doohan and Mr. O'Connor have no significant concerns in respect of the proposed licence review from an environmental health perspective.

Yours sincerely,



Ms. Rita O'Grady,
Principal Environmental Health Officer

* All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded Rita O'Grady, Environmental Health Department, Ardaghown, The Mall, Sligo. 071-9145132.