

Dorota Richards

From: Ronan Connolly <rconnolly@water.ie>
Sent: 05 September 2016 17:59
To: Maeve McHugh
Cc: Dorota Richards
Subject: Irish Water Alexion objection response
Attachments: 00206B82F233160905164524.pdf

Dear Maeve / Dorota,

Please find attached Irish Water's response related to Alexion Pharma objections to conditions of the Proposed Determination for Application P1030-01.

Kind regards,

Ronan Connolly

Sent with Good (www.good.com)

-----Original Message-----

From: Ronan Connolly
Sent: Monday, September 05, 2016 05:27 PM GMT Standard Time
To: Ronan Connolly
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31 August 2016

Ref.: Alexion Pharma International Trading – P1030-01- Comments in relation to objection to Irish Water conditions attached to consent to discharge to sewer under Section 99E of the EPA Act, as amended.

Dear Ms McHugh,

Please find below Irish Water's comments in relation to objections made by Alexion in accordance with article 26 of the Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013. In making comment, Irish Water refer to points raised by Alexion in correspondence dated 1st June 2016 and respond accordingly;

A: Removal of Conditions 5.4.6 and 5.4.7

- Irish Water is satisfied that the wording Condition 5.4.6 of the Proposed Determination may be amended to read;

Fail safe mechanism shall be employed in GMM inactivation processes used on site:

(i) *Records shall be kept on site that demonstrates that heat inactivation of GMM liquid waste has been effective.*

- Irish Water is satisfied with Condition 5.4.7 of the Proposed Determination and recommends no alteration of this condition.

B: Condition 11.14 - Inclusion of reference to Schedule C.3.2

- Irish Water is satisfied that the proposed change of wording of Condition 11.14 as requested in Alexion correspondence dated 1st June 2016 can be incorporated into the Proposed Determination.

C: Request for changes to Total Nitrogen and Sulphates emission limits in Schedule B3.

- Following consultation with Alexion Irish Water have established that proposed changes to the emission limits will not be required for a number of years. Accordingly, Irish Water are satisfied with the current Total Nitrogen and Sulphate emission limits as set out in Schedule B of the proposed determination.

D: Amendment of C.3.1 – Replacement of “Caustic dosing Pump” with “Caustic /Acid dosing pump”

- Irish Water is satisfied that the proposed amendment of C.3.1 as requested in Alexion correspondence dated 1st June 2016 can be incorporated into the Proposed Determination.

E: Amendment of C.3.2 – Removal of Total Organic Carbon (TOC) from the list Control Parameter required to be monitored

- Irish Water is satisfied with the current monitoring requirements as set out in Schedule C.3.2 - SE2 of the proposed determination. Although there are no emission limits associated with TOC set out in Schedule B.3, Irish Water require TOC to be monitored on a continuous basis in order to obtain a real-time profile of the organic load of the trade effluent discharged to sewer at SE2.

Yours sincerely,



Mark O' Callaghan

Authorised Signatory

Asset Strategy

Irish Water