



### Submission

|                           |                  |
|---------------------------|------------------|
| Submitter:                | Finan Gallagher  |
| Submission Title:         | Submission       |
| Submission Reference No.: | S004733          |
| Submission Received:      | 01 November 2018 |

### Application

|            |                        |
|------------|------------------------|
| Applicant: | AbbVie Ireland NL B.V. |
| Reg. No.:  | P1087-01               |

See below for Submission details.

Attachments are displayed on the following page(s).

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Seirbhís Sláinte Comhshaoil - Sligeach / Liatroma / Iarthar an Chabháin  
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Tel: 071 91 45132

Environmental Health Service – Sligo / Leitrim / West Cavan,  
Ardaghown, Sligo F91T25N  
Tel: 071 91 45132

24<sup>th</sup> October 2018

Environmental Licensing Programme  
Environmental Protection Agency Headquarters  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford



**Re: Environmental Impact Assessment Report for Internal Works and change in Activity at AbbVie Ireland**

Dear Sir /Madam,

Please find enclosed the HSE consultation report in relation to the above proposal. If you have any queries regarding any of these reports, the initial contact is Finan Gallagher Principal Environmental Health Officer, Ardaghown, Sligo who will refer your query to the appropriate person.

The following HSE departments were made aware of the consultation request for the proposed development on 2<sup>nd</sup> October 2018:

Emergency Planning – Paschal Diviney  
Health Protection  
Estate - Jim Murphy  
Assistant National Director for Health Protection-Kevin Kelleher/ Laura Murphy

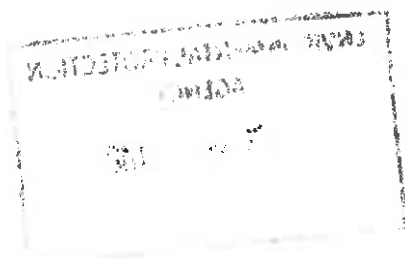
The Environmental Health Service response to the application is in the attached consultation report.

The assessment is based on an assessment of the documentation submitted to this office on the 2<sup>nd</sup> October 2018 by the National Office.  
A site visit was conducted on the 18<sup>th</sup> October 2018.

All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.

No additional investigation/ Measurements were undertaken.

This report refers only to those sections of the document which are relevant to the HSE.



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We have made observations and submissions under the following specific areas

- Water

All correspondence or any queries with regard to this report including acknowledgment of this report should be forwarded to Finan Gallagher, Principal, Environmental Health Officer, Ardaghown, Sligo.

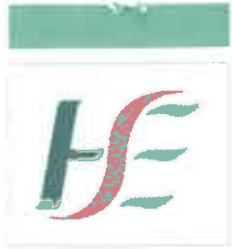
Yours Sincerely,

**Finan Gallagher,**  
**Principal Environmental Health Officer**

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**Re: Environmental Impact Assessment Report for Internal Works and change in Activity at AbbVie Ireland**

**Class and Nature of Activity: 5.16 Chemicals**

The production of pharmaceutical products including intermediates (production means the production on an industrial scale by chemical or biological processing)

**Applicant: AbbVie Ireland**

**Location of Facility: Old Bundoran Road, Ballytivnan, Sligo**

**Reference No: P1087-01**

**EHIS Ref No: 0830**

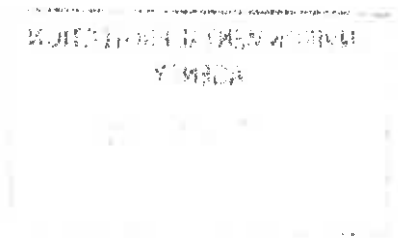
Dear Sir/ Madam,

The following are observations made whilst reviewing the above application and relevant documents:

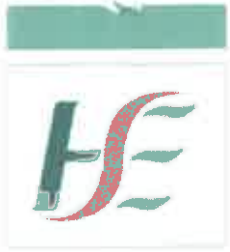
**Water**

*While there are no substantial concerns in relation to the proposal which is the subject of this application, clarification in the area of baseline groundwater quality would be beneficial. The Soil and Groundwater Baseline Report [Attachment 4.8.3] outlines exceedances of Groundwater Threshold Values (GTVs) contained in the EU Environmental Objectives (Groundwater Amendment) Regulations 2016. The exceedances quoted are for Chloride, Iron, Manganese, Aluminium and Arsenic. The suggestion is made that the chloride level may be attributable to a leaking sewer on-site and that the metal exceedances may be due to monitoring methodologies.*

*It is apparent from discussions on a site visit on Oct 18<sup>th</sup> that some mitigation work is planned in the area of sewer upgrading. A schedule of this work would provide clarification in this area.*



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*In relation to the metal exceedances mentioned above further clarification as to the reasons would be beneficial.*

*In any event consideration should be given to a regime of continuing ongoing biannual groundwater monitoring at the three existing on-site wells and a form of regular on-site sewer integrity testing and repair where necessary. The above should be considered in order to establish with greater clarity the current groundwater quality and reasons for exceedances.*

Yours Sincerely,

**Finan Gallagher,**  
**Principal Environmental Health Officer**

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