

Rec. 29/08/11
AS

Mr Brian Shiel
Engineering Services Manager
Pfizer Ireland Pharmaceuticals
Askeaton
County Limerick



26/08/11

Our Ref: P0395-02/AP05SMcD.docx

Dear Mr Shiel

I refer to your report dated 23/03/11 received by the Agency on 07/04/11 in relation to the Environmental Liabilities Risk Assessment (ELRA) and the Closure Restoration and Aftercare Management Plan (CRAMP) dated 23/03/11 received by email on 29/06/11, for Pfizer Ireland Pharmaceuticals, IPPC licence number P0395-02.

I am to advise you that the reports as submitted (regarding the technical aspects of the reports and the proposed adequacy of the costings of the financial provision) is to the satisfaction of the Agency.

The licensee should note that the proposed form of the financial provision associated with both documents will be dealt with under separate correspondence by the Agency.

Agreement by the Agency on the ELRA/CRAMP costings does not constitute an acceptance on the part of the Agency that the ELRA/CRAMP costings constitute a description of all potential risks or liabilities or costs that may arise or materialise in relation to the facility but, rather, constitute in the view of the Agency as of 26/08/11 a general assessment of risk and general estimate of costs to inform the overall environmental management and understanding of the licensed site and the putting in place of FP etc.

Where additional costs arise relating to prevention or remediation of environmental pollution, these remain the responsibility of the Licensee. Notwithstanding the ELRA and proposed financial provision, the EPA will only accept a surrender of a Licence once satisfied that all steps, including all necessary expenditures, have been taken to ensure that the site no longer poses a threat of environmental pollution etc.

Note on the next review of the CRAMP:

- Clarify whether the costs in Table 5.1.5.1 and 5.1.5.2 cover both disposal and transport costs; Table 5.1.5.2 references 'transport costs only' despite the text stating the costs being for disposal and/or transport and disposal.
- Sections of the plan relating to the liquid wastes being sent to the onsite wastewater treatment plant including page 27 relating to the compliance monitoring of the effluent, should stipulate that only wastes suitable for the wastewater treatment plant will be sent to same and the controlled drip-feed will be conducted in such a manner which will ensure the full compliance of the final treated effluent against the ELVs for the duration of the decommissioning period.
- Clarify whether provision for site security has been provided for in the decommissioning stage.

Yours sincerely



Siobhán McDonnell, Inspector
Office of Environmental Enforcement

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