

Pfizer Nutritionals Ireland Limited T/A Wyeth Nutritionals Ireland

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Ms. Ana Bolger
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford

IPPC Licnece Reg.:

No. P0395-02

Date:

November 2nd 2011

RE:

IPPC Licence Review Application Form for the purposes of EC Environmental

Objectives (Surface Waters) Regulations 2009.

Dear Ms, Bolger,

Please find enclosed one signed original, one hardcopy and two copies on CD-ROM of the above application as requested in your letter dated 28th July 2011. While initially specified that the submission should be made by 1st of October 2011, this was later deferred by the Agency's Ann Marie Donlon until 1st November 2011, after our IPPC licence was transferred.

Trusting that all of the information you require is contained in this application, however, should you require any additional information please don't hesitate to contact me by phone at 061.601.307 or by email at brian.shiel@pfizer.com.

Yours sincerely,

Brian Shiel.

Encl./ One signed original, one hardcopy and two copies on CD-ROM of the IPPC Licence Review Application Form for Pfizer Nutritionals Ireland Limited, IPPC Licence Reg. No. P0395-02.

Wyeth Nutritionals Ireland is a business name of Pfizer Nutritionals Ireland Limited Registered in Ireland Company Number: 393631 – VAT Number IE6413631Q Registered Office: Operations Support Group, Ringaskiddy, Co. Cork Directors: Peter Duffy, Paul Duffy Secretary: Peter Duffy





Pfizer Nutritionals reland Limited

IPPC Licence Review Application Form

for the purposes of EC Environmental Objectives (Surface Waters) Regulations 2009

October 2011





Integrated Pollution Prevention and Control (IPPC)/Waste Licensing

Review Formand Guidance Note

for the purposes of

EC Environmental Objectives (Surface Waters) Regulations 2009

Environmental Protection Agency

P.O. Box 3000, Johnstown Castle Estate, Co. Wexford Lo Call: 1890 335599 Telephone: 053-9160600 Fax: 053-9160699

Web: www.epa.ie Email: info@epa.ie

INTRODUCTION

This Form is for the purposes of a review of an IPPC/Waste Licence in order to ensure that all authorisations under the *EPA Act 1992 to 2007* and the *Waste Management Acts 1996 to 2010* having discharges liable to cause water pollution are in compliance with the *EC Environmental Objectives (Surface Waters) Regulations 2009*.

While every effort has been made to ensure the accuracy of the material contained in the Review Form, the EPA assumes no responsibility and gives no guarantees, undertakings and warranties concerning the accuracy, completeness or up-to-date nature of the information provided herein and does not accept any liability whatsoever arising from any errors or omissions.

The Review Form and all supporting information shall be submitted to the Headquarters of the Agency in a format of a signed original, one hardcopy and two copies on CD-Rom. In cases where an Environmental Impact Statement (EIS) is required in support of the Review Form, a signed original, one hardcopy plus 16 copies (or 18 copies if the activity is within Energy sector) on CD-Rom shall be submitted.

All pages, including maps/drawings/plans, shall be no larger than A3 size. All files on CD-Rom shall be submitted in searchable PDF format and be no larger than 10MB each in size. All CD-Roms shall be tabelled with the Licensee's name, Licence Register Number, address of the activity and name of the file (i.e. Review Form).

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SECTION A: GENERAL

A.1 Licensee

Name*:	Pfizer Nutritionals Ireland Ltd		
Address:	Coolrahnee		
	Askeaton		
	Co. Limerick		
Tel:	061-392168		
Fax:	061-601157		
e-mail:	brian.shiel@pfizer.com		

^{*} This should be the name of the Licensee which is current on the date this IPPC/Waste Licence Review Form is lodged with the Agency. It should be the name of the legal entity (which can be a limited company or a sole trader). A trading/business name is not acceptable.

Name and Address for Correspondence

Only documentation submitted by the Licensee and by the nominated person will be deemed to have come from the Licensee.

Name:	Mr. Brian Shiel
Address:	Pfizer Nutritionals Ireland Ltd
	Askeaton
	Co. Limerick
	and the second s
Tel:	061-392168 guff guff
Fax:	061-601157 <u>indical</u>
e-mail:	brian.shiel@pfizer.com
	20 VC

Address of registered or principal office of Body Corporate (if applicable)

Address:	Operations Support Group
	Ringaskiddy
	Co. Cork
Company	393631
Register	
No.	
Tel:	021-5008000
Fax:	-
e-mail:	peter.duffy@pfizer.com

A.2 Location of Activity

Name:	Pfizer Nutritionals Ireland Ltd		
Address*:	Coolrahnee		
	Askeaton		
	Co. Limerick		
Tel:	061-392168		
Fax:	061-601157		
Contact Name:	Mr. Brian Shiel		
Position:	EHS Lead		
e-mail:	brian.shiel@pfizer.com		

^{*} Include any townland.

National Grid Reference	133524E, 151326N
(12 digit 6E,6N)	

Location maps (no larger than A3), appropriately scaled, with legible grid references should be enclosed in **Attachment Nº A.2**. The site boundary must be outlined on the map in red colour.

Geo-referenced digital drawing files (e.g. AutoCAD files) in Irish Grid projection of the site boundary and overall site plan, including labelled emission points to surface water and their monitoring and sampling locations, are also required.

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SECTION B: EMISSIONS

B.1 Emissions to Surface Waters

Describe the nature of emissions from the activity to receiving surface waters. Specify which of these emissions are process discharges and storm/surface water discharges.

Tables B.1(i) and B.1(ii) should be completed.

Please note that monitoring of the discharge(s) for the purposes of Table B.1(ii) shall be undertaken for the list of compulsory parameters listed in Table D.1(i). Where other relevant substances have been identified, during the Assessment of Impact on Receiving Surface Water requested under Section D.1 of this Review Form, monitoring of the discharge upstream and downstream for the relevant parameters shall also be included.

A summary list of the emission points, together with maps/drawings (no larger than A3) and supporting documentation should be included as **Attachment Nº B.1**.

B.2 Tabular Data on Emission Points to surface water

Licensees should submit the following information for each emission point to surface water:

Point Code	Easting	Northing	only Werified	Emission
SW1	133614	151496 151496 151496 151496 15151510 15151515	Y (based on site drawing with grid superimposed)	pH, BOD, Suspended Solids, Total N, Ammonia, Total P, Oil, Fats & Grease, Toxicity
SW2 (stormwater) – There are 7 emission points in total. Monitoring only required for SW2	133552 °C	151540	Y (based on site drawing with grid superimposed)	pH, BOD, Total N, Ammonia,

^{*} SW = Surface Water

An individual record (i.e. row) is required for each emission point. Acceptable file formats include Excel, Access or other upon agreement with the Agency.

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SECTION C: CONTROL & MONITORING

Describe the proposed technology and other techniques for preventing or, where this is not possible, reducing emissions from the installation/facility.

C.1 Treatment, Abatement and Control Systems

An overview/summary of treatment/abatement systems for effluent emissions should be included together with schematics as appropriate.

For each Surface Water Emission Point identified complete Table C.1(i).

Supporting information should form **Attachment Nº C.1**.

Normal operation and variations for start-up and shutdown should be described. Anticipated malfunctions and known problems associated with the treatment should be highlighted.

Proposed monitoring to be undertaken for influent(s) to treatment plant, and intreatment monitoring required for the management of the treatment plant should be detailed.

Please find description of the operation of our Wastewater Treatment Plant in Attachment C

C.2 Monitoring and Sampling Points

Identify monitoring and sampling points and outline proposals for monitoring emissions to surface water bodies.

Table C.2(i) should be completed (where relevant) for emissions to surface water.

Where ambient environment monitoring is carried out or proposed, Table C.2(ii) should be completed as relevant for each environmental medium and at least 12 samples should be taken at regular intervals.

Include details of monitoring/sampling locations and methods.

Supporting information should form **Attachment Nº C.2**.

C.3 Tabular Data on Monitoring and Sampling Points

Licensees should submit the following information for each monitoring and sampling point:

Point Code	Point Type	Easting	Northing	Verified	Pollutant
Provide label ID's	M=Monitori ng S=Sampling	6E-digit GPS Irish National Grid Reference	6N-digit GPS Irish National Grid Reference	Y = GPS used N = GPS not used	e.g. Ammonia (as N), Biochemical oxygen demand

An individual record (i.e. row) is required for each monitoring and sampling point. Acceptable file formats include Excel, Access or other upon agreement with the Agency.

Point source monitoring/sampling refers to monitoring from specific emission points (e.g. from a wastewater treatment plant). Ambient monitoring includes monitoring of river quality upstream/downstream of an effluent discharge.



SECTION D: EXISTING ENVIRONMENT & IMPACT OF THE ACTIVITY

D.1 Assessment of Impact on Receiving Surface Water

Describe the existing environment in terms of water quality with particular reference to environmental quality standards as specified within the *EC Environmental Objectives* (Surface Waters) Regulations 2009 S.I. No. 272 of 2009. Table D.1(i) should be completed as directed.

Indicate whether or not the activity complies with the requirements of the EC Environmental Objectives (Surface Waters) Regulations 2009 S.I. No. 272 of 2009.

The Licensee should conduct an assessment of impact of discharge(s) from the installation/facility on receiving surface water. In undertaking this assessment the Licensee shall have particular regard to substances used in the manufacturing processes likely to result in discharges of those substances listed in the EC Environmental Objectives (Surface Waters) Regulations 2009 S.I. No. 272 of 2009. When completing any assimilative capacity calculations have regard to the Water Services Training Group 'Guidance to Applicant – Discharge to Surface Waters' available at http://www.wsntg.ie/publications/index.asp and other standard guidance.

If the process discharges are to coastal, transitional waters or lakes, the assessment may require a modelling study. The modelling study shall include estimates on what the resultant concentrations of the permitted substances in the receiving water body will be upon discharge at the current licence limits.

Regardless of the receiving water body type determine the maximum allowable discharge concentrations to achieve compliance with the 95%ile good status limits. N.B. If the discharge is to a water body that is already achieving high status, or if the discharge is to waters draining to the surface water bodies identified under the First Schedule of the EC Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009, compliance must be with 95%ile high status limits.

State distance from the process discharges to a nearest downstream water dependent Protected Area. Include the name and code of this Protected Area.

Full details of the assessment, including a copy of an Environmental Impact Statement if it was required for the purposes of obtaining planning permission(s), should be submitted as **Attachment** \mathbb{N}° **D.1.1**.

Where necessary, the Licensee should supply detailed information on the proposals to comply with the requirements of the *EC Environmental Objectives (Surface Waters)* Regulations 2009 S.I. No. 272 of 2009 including a detailed timeframe for any proposed works in **Attachment N^{\circ} D.1.2**.

Please find in Attachment D the Impact Assessment Report.

D.2 Environmental Considerations and Best Available Techniques (BAT)

Describe, in outline, the main alternatives, if any, to the proposals contained in the Review Form.

Describe any environmental considerations which were made with respect to the use of cleaner technologies, waste minimisation and raw material substitution.

Describe the measures proposed or in place to ensure that:

- (a) the best available techniques are or will be used to prevent or eliminate or, where that is not practicable, generally reduce an emission from the activity;
- (b) no significant pollution is caused;
- (c) waste production is avoided in accordance with *Council Directive 75/442/EEC of 15 July 1975 on waste*; where waste is produced, it is recovered or, where that is technically and economically impossible, it is disposed of while avoiding or reducing any impact on the environment;
- (d) energy and other resources are used efficiently;
- (e) the necessary measures are taken to prevent accidents and limit their consequences; and,
- (f) the necessary measures are taken upon definitive cessation of activities to avoid any pollution risk and return the site of operation to a satisfactory state.

This section should present a statement on energy efficiency at the site to include, where appropriate, an energy audit with reference to the EPA Guidance document on Energy Audits. Licensees should have regard to Section of the EPA Acts 1992 and 2003 in selecting BAT and in particular the following:

- The use of low-waste technology,
- The use of less hazardous substances;
- The furthering of recovery and recycling of substances generated and used in the process and of waste where appropriate;
- Comparable processes, facilities or methods of operation, which have been tried with success on an industrial scale;
- Technological advances and changes in scientific knowledge and understanding;
- The nature, effects and volume of the emissions concerned;
- · The commissioning dates for new or existing facilities;
- The length of time needed to introduce the BAT;
- The consumption and nature of raw materials, including water, used in the process and their energy efficiency;
- The need to prevent or reduce to a minimum the overall impact of the emissions on the environment and the risks to it;
- The need to prevent accidents and to minimize the consequences for the Environment; and,
- The information published by the Agency in the form of sectoral BAT Guidance documents and the relevant BREF documents published by the EC (available for download at http://eippcb.jrc.es/ and at www.epa.ie).

Please find in Attachment E the BAT Report.

SECTION E: STATUTORY REQUIREMENTS

E.1 Best Environmental Practices – Compliance with Legislation

Demonstrate if the best environmental practices are in place for control of diffuse emissions from the installation/facility as set out in the following legislation:

- (a) a specification prepared by the Agency in accordance with Section 5 of the *Environmental Protection Agency Act 1992* as amended by Section 7 of the *Protection of the Environment Act 2003*;
- (b) the *Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001)* as amended by the *Urban Waste Water Treatment (Amendment)* Regulations 2004 (S.I. No. 440 of 2004) or any future amendment thereof;
- (c) the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2009 (S.I. No. 101 of 2009) or any future amendment thereof;
- (d) the Local Government (Water Pollution) Act, 1977 (Control of Cadmium Discharges) Regulations 1985 (S.I. No. 294 of 1985);
- (e) the Local Government (Water Pollution) Act, 1977 (Control of Hexachlorocyclohexane and Mercury Discharges) Regulations 1986 (S.I. No. 55 of 1986);
- (f) the Local Government (Water Pollution) Acts, 1977 and 1990 (Control of Carbon Tetrachloride, DDT and Rentachlorophenol Discharges) Regulations 1994 (S.I. No. 43 of 1994); and
- (g) measures or controls identified in a pollution reduction plan for the river basin district prepared in accordance with Part V of the EC Environmental Objectives (Surface Waters) Regulations 2009 S.I. No. 272 of 2009 for the reduction of pollution by priority substances or the ceasing or phasing out of emissions, discharges and losses of priority hazardous substances.

Pfizer confirms that it is in compliance with the above legislation.

SECTION F: APPROVED ADJUSTMENTS & CONDITIONS

Where the Office of Environmental Enforcement (OEE) of the Agency has agreed any variations or adjustments to the conditions of the existing licence, the licensee must supply a schedule detailing these agreed variations and adjustments to the existing licence conditions. An updated, scaled drawing of the site layout (no larger than A3) providing visual information on such adjustments or variations where appropriate should be included.

In the case of once-off assessments/ reports required under conditions of the existing licence the licensee must supply a schedule detailing those assessments/ reports that have been completed and agreed with the Office of Environmental Enforcement (OEE) or as otherwise agreed.

Attachment Nº F1 shall include the schedule of variations and/or adjustments together with the updated drawing.

Condition No.	Existing Condition	Proposed Wording (where appropriate)	OEE Agreement Reference	Description
			· Use.	

Please see Attachment F Schedule of Agreements for further details

SECTION G: DECLARATION

Declaration

I certify that the information given in this Review Form is truthful, accurate and complete.

I give consent to the EPA to copy this Review Form for its own use and to make it available for inspection and copying by the public, both in the form of paper files available for inspection at EPA and via the EPA's website. This consent relates to this Review Form itself and to any further information, submission, objection, or submission to an objection whether provided by me as Licensee, any person acting on the Licensee's behalf, or any other person.

Signed by:	lil Date:	02/11/11
(on behalf of the organisation		neritä
Print signature name:		A. May and agr.
Position in organisation:	EHS Lead number tired	
	EHS Lead Rection Pure required to the consent of confusion to the consent of confusion to the consent of consent of confusion to the	
	for hing	Company stamp or seal:
	Consent	

ANNEX 1: TABLES/ATTACHMENTS

Tables/ATTACHMENTS

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TABLE B.1(i):	EMISSIONS TO	SURFACE WATERS
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(One page for each emission)

Emission Point:

Emission Point Ref. No.:	SW1
Source of Emission:	Wastewater Treatment Plant
Location :	Askeaton, Co. Limerick
Grid Ref. (12 digit, 6E,6N):	133614E, 151496N
Name of receiving waters:	Deel Estuary
Flow rate in receiving waters:	N/A m³.sec ⁻¹ Dry Weather Flow N/A m³.sec ⁻¹ 95%ile flow

Emission Details:

(i) Volume to be er	nitted	rion pur equiti	
Normal/day	2800 m ³	Maximum/day Hone	2800 m ³
Maximum rate/hour	126 m ³	of copy,	

(ii) Period or periods during which emissions are made, or are to be made, including daily or seasonal variations (start-up /shutdown to be included):

Periods of Emission (avg)	24	hr/day	350	day/yr
---------------------------	----	--------	-----	--------

Emission Point:									
Emission Point Ref. No.:		SW2	V2						
Source of Emission:		Stormwate	r Discharge						
Location :		Askeaton,	Askeaton, Co. Limerick						
Grid Ref. (12 digit, 6E,6N	١):	133552E,	151540N						
Name of receiving waters	5:	Deel Estuary							
Flow rate in receiving wa	ters:				es ally any other use.	<u>N/A</u>	m³.sec ⁻¹ Dry Weather Flow m³.sec ⁻¹ 95%ile flow		
Emission Details:				á	uposo ited				
(i) Volume to be em	itted			Decitor of Own	i rea				
Normal/day		N/A	Maximum/day	Fortilian			N/A		
Maximum rate/hour		N/A setting of the second of t							

Page 1	3
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Periods of Emission (avg)

60 min/hr <u>24 hr/day 365 day/yr</u>

TABLE B.1(ii): EMISSIONS TO SURFACE WATERS - Characteristics of the emission (One table per emission point)

Emission Point Reference Number: SW1

Parameter		Prior to t	reatment		As discharged				% Efficiency
	Max. hourly average (mg/l)	Max. daily average (mg/l)	kg/day	kg/year	Max. hourly average (mg/l)	Max. daily average (mg/l)	kg/day	kg/year	
					150				
BOD	5,600	5,600	1,970	689,500	40 other use	40	100	35,000	99%
Suspended Solids	1,960	1,960	970	339,500	50 y and	50	140	49,000	97.5%
Total Nitrogen	-	-	-		\$	15	42	14,700	-
Total P (As P)	6.9	6.9	12.5	4,375 on the real	2	2	5.6	1,960	31%
MRP (As P)	3.45	3.45	6.25	4,375 on Purpose 4,375 on Purpose 2,188 on the red of the control of the contr	1	1	2.8	980	31%
Oils, Fats & Greases	-	-	-	or rise	15	15	42	14,700	-
Ammonia	2.2	2.2	4.0 Consent		10	10	28	9,800	-

TABLE B.1(ii): EMISSIONS TO SURFACE WATERS - Characteristics of the emission (One table per emission point)

Emission Point Reference Number: SW2(stormwater)

Parameter		Prior to treatment			As discharged			% Efficiency	
	Max. hourly average (mg/l)	Max. daily average (mg/l)	kg/day	kg/year	Max. hourly average (mg/l)	Max. daily average (mg/l)	kg/day	kg/year	
pH BOD Total N (as N) Ammonia (as N)			*Misent of	of its pector per feet	only any other use.	6.5-9 pH units 15 15			N/A N/A N/A N/A

TABLE C.1(i): ABATEMENT/TREATMENT CONTROL

Emission Point Reference Number: SW1

Control ¹ parameter	Equipment ²	Equipment maintenance	Equipment calibration	Equipment back-up	Monitoring to be carried out ³	Monitoring equipment	Monitoring equipment calibration
OFG Removal	Motor/Belt	Annual	-	Spares accessible			
pH (neutralisation)	Acid/Caustic Dosing Pumps	Annual	-	Spares accessible			
Effluent Transfer	Transfer Pumps	Annual	-	Spares accessible			
Dissolved Oxygen (SBR)	Blowers	Annual	- Stign Purp	Spares accessible	Dissolved Oxygen	DO Meter	-
MLSS	Sludge Transfer Pumps	Annual	- For its pection purp - For its pection owner re - Consent of copyright owner re Consent of copyright owner re	Spares accessible	MLSS	MLSS Meter	-
-	Belt Filter	Annual	- of cer	Spares accessible	-	-	-
Plant Loading			C		COD (Raw Effluent)	Hach	
Plant Loading					P (Raw Effluent)	Standard Methods	-
Sludge Health	-	-	-		Sludge Floc Microscopy	Microscope	-

¹ List the operating parameters of the treatment/abatement system which control its function.
² List the equipment necessary for the proper function of the abatement/treatment system.
³ List the monitoring of the control parameter to be carried out.

TABLE C.2(i): EMISSIONS MONITORING AND SAMPLING POINTS

(One table per monitoring point)

Emission Point Reference Number: SW1

Parameter	Monitoring frequency	Accessibility of Sampling Points	Sampling method	Analysis method/ technique
Flow	Continuous	Good Solly and the	On-line Meter	On-line Meter
рН	Continuous	Good npure direct	On-line Meter	pH electrode
COD	Daily	Good getternet	Flow Proportional	Standard Methods
BOD	Weekly	Good	Flow Proportional	Standard Methods
Suspended Solids	Daily	Good	Flow Proportional	Standard Methods
Nitrates (as N)	Daily	Good	Flow Proportional	Standard Methods
Ammonia (as N)	Daily	Good	Flow Proportional	Standard Methods
Total Phosphorus (as P)	Weekly	Good	Flow Proportional	Standard Methods
MRP (as P)	Daily	Good	Flow Proportional	Standard Methods
Total Nitrogen (as N)	Weekly	Good	Flow Proportional	Standard Methods
Oils, Fats & Greases	Weekly	Good	Flow Proportional	Standard Methods
Toxicity	Annually	Good	Flow Proportional	Standard Methods

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TABLE C.2(ii): AMBIENT ENVIRONMENT MONITORING AND SAMPLING POINTS (One table per monitoring point)

Monitoring Point Reference Number: N/A

Parameter	Monitoring frequency	Accessibility of Sampling point	Sampling method	Analysis method/ technique
		For its pection purposes only any other	ge.	

Table D.1(i) RECEIVING WATER SURFACE WATER QUALITY

Monitoring Point/Grid Reference:	N/A

Parameter	Results ¹ (mg/l)													Normal Analytical Range	Analysis method/ technique
	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date			
pH															
Temperature										350	•				
Electrical conductivity EC										4 other d					
Ammonia (as N)									Sould a						
Chemical oxygen demand								Ditto	difed to						
Biochemical oxygen demand							, nepe	tion per 1							
Dissolved oxygen DO							For the Copyright								
Total Nitrogen (as N)						Consen	0								
Nitrite (as N)						0									
Nitrate (as N)															
Total Phosphorous (as P)															
OrthoPhosphate (as P)															

¹ At least 12 samples should be taken at regular intervals.

Provide summary of the monitoring results