

BP/18/10237L02

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Noeleen Keavey
Office of Environmental Sustainability
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford

18th December 2018

RE: IE Licence Application Ref. LA001712

Dear Ms. Noeleen Keavey,

This letter outlines our response to the further information request issued to AbbVie Ireland NL B.V. (AbbVie) by the Environmental Protection Agency (the Agency) on 23 October 2018.

The following outlines how each of the points in the further information request have been addressed.

1. An assessment against the conclusions on BAT from the BAT Reference Document (BREF) in Industrial Cooling Systems

This is now included in *Attachment 4-7-5-BREF-Industrial Cooling Systems*.

2. Clarification regarding the type of interceptors to be installed on the stormwater network of the installation.

Following detailed design of the new bio-chemical manufacturing suite, AbbVie are currently finalising a number of changes to the stormwater drainage system. These changes will affect:

- The number of, size, type (including at least 1 no. Class 1 Full Retention interceptor), and location of the interceptors in the north side of the site discharging through SW-3;
- Road tanker loading area for diesel storage;
- Replacement of the existing onsite hydrocarbon interceptors with new Class 1 By-pass interceptors at SW-1 & SW-2.

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The aforementioned changes may result in a stormwater design different to the one presented in the IE licence application. As such, AbbVie requests that an extension of time be provided for return of the Request for Information response to allow AbbVie to prepare a comprehensive outline of the changes. There will be no increase in the number of emission points.

Further details of the proposed drainage layout and the interceptors will be provided in a subsequent letter to be sent to the Agency in January 2019.

As part of the January 2019 submission the following documents will also be updated to address the changes to the design:

- *Attachment 4.8.1 Operational Report,*
- *Attachment 7.1.3.1 Compliance Report,*
- *Attachment 7.1.3.2 Emissions Impact Assessment, and*
- *Attachment 7.1.3.3 Receiving Environment Report.*
- *Drawing 008 Site Drainage*

3. A Natura Impact Statement, as defined in regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended.

An AA screening report was completed as part of the submission for planning for the new bio-pharmaceutical suite. The purpose of this screening report was to assess the potential for the proposed development to impact on a European designated site.

The AA screening report concluded that *Given the nature of the development, the existing localised and temporary nature of the construction effects identified as potential sources as well as the environmental controls and best practice measures outlined in the CEMP, the proposed development will not lead to a significant in-combination effect with any other plans or projects* (page 34, Attachment 6.2.1 of this application). It was therefore concluded that a Stage Two NIS was not required.

However, The AA Screening undertaken by the EPA concluded that an NIS was required. As such an NIS has been completed for the proposed development in order to assess whether the mitigation measures proposed as part of the development including the design of the facility were sufficient to prevent significant adverse impacts occurring to designated sites as a result of the development.

As the revised stormwater layout may impact on the NIS this document will also be submitted in January 2019 following detained design of the new stormwater system.

A revised Non-Technical Summary will also be provided as part of the January 2019 submission and will incorporate the above changes.

If the Agency have any further questions regarding the details submitted in this RFI response or in the IE Licence application, please feel free to contact us.

Yours sincerely,



Brigette Priestley
Senior Environmental Consultant

cc. Charelene Rooney, EHS Engineer, AbbVie Ireland NL B.V.

Inc. Attachment 4.7.5 BREF Industrial Cooling Systems.

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