
TECHNICAL NOTE

Project **AbbVie Ireland NL B.V. IED Licence
Application LA001712**

Subject **Response to EPA Further
Information Request no. 2**

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1.0 INTRODUCTION

This technical note outlines our second 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.

2.0 REQUEST FOR FURTHER INFORMATION

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 has been provided. This was provided in December 2018.
2. Clarification regarding the type of interceptors to be installed on the stormwater network of the installation. This is addressed in Section 3.0 below.
3. A Natura Impact Statement, as defined in Regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended. This is now included in *Attachment 6.2.2 NIS January 2019* with the results outlined in Section 4.0 below.

A revised Non-Technical Summary has been provided which addresses the above clarifications and changes. This is *Attachment 1.2 Non-Technical Summary v2*.



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3.0 STORMWATER NETWORK AND INTERCEPTORS

Surface water from the buildings and yards is collected via a series of points across the facility. These then discharge via a series of hydrocarbon interceptors to an offsite drainage ditch along the eastern and southern boundaries of the site at 3 no. Emission Points (SW1, SW2, and SW3). The drainage ditch eventually discharges into the Shannon Eighter.

As part of the proposed development, the North Yard will include a new emergency generator complete with a 10m³ double skinned belly tank used to hold diesel for the generator. The bulk diesel tank will also be equipped with leak detection.

It is proposed that a new loading bay will be installed adjacent to the emergency generator for the delivery of diesel to the bulk tank. The loading bay itself will be bunded and sunken to contain all stormwater generated in the area and to prevent stormwater and / or any spillage of diesel draining to the porous tarmac area in the North Yard. The bunded loading bay will be equipped with a retention sump which is connected to the new stormwater drainage line. Under normal circumstances the stormwater will be pumped from the sump to a new Class 1 Full Retention Interceptor at point H on Drawing 008 Version 2. Following the interceptor, drainage from this area will connect in to the existing drainage network and will discharge off the site at SW3.

The volume of the bunded loading bay (including the retention sump) will be 10 m³ which will be sufficient to contain both the stormwater generated from a 1:100 year storm event as well as up to 1 no. cell of a delivery tanker that may be spilled during a delivery (10m³ is based on 7600L of diesel from a tanker cell x 110% as per the bunding convention = 8360 L, plus 1640 L of rainwater).

The retention sump (Monitoring Point SW3a) will be equipped with a built-in level switch and an oil detector which will shut off the pump and cease the discharge to the stormwater drain should a major fuel spill in the loading bay be detected. The spill would therefore be contained within the bunded loading bay until such time that it can be removed and disposed of by a licensed/permitted contractor.

The proposed Class 1 Full Retention interceptor at the loading bay will be certified to EN858-1 and will be equipped with a level alarm. The size of the interceptor will be 2000 L with an oil storage capacity of 56L which is sufficient to retain hydrocarbons that may be regularly entrained in the stormwater at this area.

Stormwater draining to the 3 no. existing Emission Points (SW1, SW2, and SW3) passes through 3 no. hydrocarbon interceptors located near to the discharge points. It is proposed that these interceptors, indicated as points A, B and D on Drawing 008 Version 2, will be upgraded to Class 1 By-pass interceptors as there is no bulk storage of oils within the areas drained. These interceptors have been sized based on the size of the drainage area and will be as follows:

- Oil storage capacity of 1140 L at SW1 (Point D)
- Oil storage capacity of 245 L at SW2 (Point A)
- Oil storage capacity of 440 L at SW3 (Point B)

The interceptor indicated at point C on Drawing 008 Version 1 was an existing interceptor previously required by the prior owners of the site as the area adjacent to that interceptor was used to store fuel oil. This interceptor is no longer required and has therefore been removed from the site.

As indicated in Attachment 7.7 of the IE Licence application, AbbVie is not proposing to conduct continuous monitoring at the licenced discharge points. Rather, level alarms will be installed on all new interceptors and weekly inspections of the manholes at Monitoring Points SW1a, SW2a and SW3b will be completed as a minimum. These monitoring locations are shown on Drawing 006 Version 2.

A leak detection probe with an alarm will also be installed on the diesel tank which is double skinned to contain leaks. There will be no external bulk storage of chemicals at the site other than diesel, and all other potentially hazardous substances will be stored in small quantities only in the self-bunded external chemstores or will be fully contained within the production areas.

The high high strength wastewater will also be stored in a 7m³ stainless steel, sunken bunded sump tank and a 60m³ stainless steel, bunded bulk tank located beside the main building. Details of the bunds are provided in Attachment 4.8.1 Operational Report. In the event of a spill into the bund, the wastewater would be tested and pumped out into the appropriate tank. Level alarms will be in place on the high high strength wastewater tank and on the bund.

As such it is considered that the network of hydrocarbon interceptors and the use of level alarms will be sufficient to monitor for potential pollution and additional monitoring of the stormwater emissions above and beyond that proposed is not required.

Attachment 4.8.1 Operational Report and *Attachment 7.7 Stormwater Discharges* have been updated to reflect these changes. The environmental impact assessments provided in *Attachment 7.1.3.1 Compliance report*, *Attachment 7.1.3.2 Emissions Impact Assessment*, and *Attachment 7.1.3.3 Receiving Environment Report* have also been updated.

4.0 APPROPRIATE ASSESSMENT (AA) SCREENING AND NATURA IMPACT STATEMENT (NIS)

An AA screening report was completed as part of the submission for planning for the new bio-chemical 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 the implementation of the IE License would have the potential to impact European Sites if not mitigated, and that a NIS was therefore required for the proposal. As such a NIS has been completed for the proposed facility in order to assess whether the mitigation measures proposed as part of the IE licence were sufficient to prevent significant adverse impacts occurring to designated sites as a result of the implementation of the Licence.

This assessment concluded that by incorporating the mitigation measures proposed in the IE licence application, implementation of the IE Licence will not cause

significant adverse effects to the ecological integrity of any European sites, alone or in combination with other plans or projects.

The NIS is now included as *Attachment 6.2.2 NIS January 2019* of the IE licence application.

5.0 UNSOLICITED ADDITIONAL INFORMATION

It is anticipated that there may be, due to possible future changes in the drug products produced at the facility, some minor changes to the raw materials, intermediates, and products listed in Attachment 4.6.2. In the event that the drug products change, the changes to the chemicals stored will be minor in nature and will include predominantly changes in the ingredients rather than changes in the bulk cleaning and utilities chemicals. It is not anticipated that there will be any new bulk storage of hazards to the environment chemicals as a result of these product changes.

Changes in the drug products produced onsite may also result in minor changes to the nature of the wastes produced. This may result in minor changes to the volumes of waste and / or to the EWC codes. As with the raw materials, it is not anticipated that these changes will result in a major increase in hazardous wastes produced at the facility.

Changes to the chemical list will be provided to the Agency's enforcement officer following grant of the IE Licence. Changes to the waste volumes and EWC codes will be presented in the Annual Environmental Report (AER) to be submitted to the Agency each year.

6.0 SUMMARY

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,



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Senior Environmental Consultant

On Behalf of AbbVie Ireland NL B.V.

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

Inc.

- Attachment 1.2 Non-Technical Summary Version 2;
- Attachment 4.8.1 Operational Report Version 2;
- Attachment 6.2.2 NIS January 2019;
- Attachment 7.7 Stormwater Discharges Version 2;
- Attachment 7.1.3.1 Emissions Compliance Report Version 2;

- Attachment 7.1.3.2 Emissions Impact Assessment Version 2;
- Attachment 7.1.3.3 Receiving Environment Report Version 2;
- Drawing 006 Version 2;
- Drawing 008 Version 2

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