

We are writing to you to formally notify the Agency of our observations in relation to the proposed determination of licence number P1087-01 for AbbVie Ballytivnan Sligo. The issues raised within the submission primarily refer to clarification on a range of ambiguity in certain conditions.

The conditions to which we object and the reason for objection are outlined below:

1. **Condition 3.12.1** The site licences shall carry out a risk assessment to determine if activity should have a fire water retention facility. The licensee shall submit a report to the Agency for approval on the findings and recommendations of the assessment within 6 months of the date of grant of the licence (Page 14 of Proposed Determination).

**Objection:** A Firewater retention risk assessment was submitted to the Agency on the 23<sup>rd</sup> of September 2019 under unsolicited information in the 'Applicant folder'. We are requesting confirmation from the Agency if condition 3.12.1 is now satisfied.

2. **Condition 3.12.3** In the event of a fire or a spillage to storm water, the storm water shall be diverted for collection. (Page 14 of Proposed Determination).

**Objection:** Clarification from the Agency is requested to confirm if condition 3.12.3 is now redundant based on the Firewater retention risk assessment submitted on the 23<sup>rd</sup> of September 2019 under unsolicited information.

3. **Condition 4.5 Noise** – Labelling of Noise Sensitive Locations

**Objection:** Permission is requested from the agency to eliminate the requirement for labelling the noise monitoring locations. The three noise monitoring locations are outside the licence boundary and AbbVie property and signage would be highly difficult to maintain. (Page 16 of Proposed Determination).

4. **Condition 5.5.3** A summary report of volumes of trade effluent and other matter discharged to the sewer along with monitoring and analysis data as specified in Scheduled B: Emissions to Sewer, of this licence and schedule C: Control & Monitoring, of this licence shall be forwarded to both Irish Water and the Local Authority in a manner and timeframe as may be specified by Irish Water. (Page 17 of Proposed Determination).

**Objection:** Clarification required if this condition supersedes the requirements of the sites existing Discharge to Sewer Licence number 927442- issued by Irish Water and thus meaning that AbbVie no longer require to satisfy the conditions outlined in the Irish Water License.

5. **Condition 6.9** The integrity and water tightness of all tanks, bunding structures, containers and underground pipes and their resistance to penetration by water or other materials carried or stored therein shall be tested and demonstrated by the licensee within 3 months of the date of the grant of the licence. (Page 18 of Proposed Determination).

**Objection:** AbbVie are requesting that the condition for testing and demonstration of integrity of bund structures and underground pipes within 3 months of the date of the grant of the licence be changed to the requirement that they are tested once every 3 years. Reason: All new bund structures and new underground pipes have been tested during commissioning within the last 6 months. Evidence for this testing may be provided and AbbVie do not consider it appropriate to have to retest in such a short timeframe.

6. **Schedule B.3** - Discharge Location SE1

**Objection:** AbbVie have altered the location of SE1 from (169924E, 337330E) to (169925E, 337335N) grid coordinates. The location of the sampling point is close to the original reference. The change was made as the original location was difficult to access from a health and safety perspective. (Page 26 of Proposed Determination).

7. **Schedule B.3** - Volume to be Emitted 12.7 m<sup>3</sup>

**Objection:** Clarification required over the volume of wastewater emitted per hour. Does this figure solely cover the amount of wastewater emitted from the low strength process waste tanks or does it refer to the total amount of wastewater emitted from the site at SE1? (Page 26 of Proposed Determination).

8. **Schedule C.3.1** - Control of emissions to Sewer

**Objection:** AbbVie are seeking clarification to confirm that this monitoring is being undertaken immediately following the Wastewater treatment plant. Confirmation is required that this monitoring point is SE1A. (Page 28 of Proposed Determination).

9. **Schedule C.3.2** - Monitoring of emissions to Sewer

**Objection:** As per C.3.1 above it is believed that these parameters are being monitored following wastewater treatment. Confirmation is required that this emission monitoring point is SE1B. (Page 29 of Proposed Determination).