

# MEMO

**TO:** Board of Directors **FROM:** Dara Lynott

**CC:** **DATE:** 18/07/03

**SUBJECT :** Technical Committee Report on objections to the Proposed Decision on Waste Application Register No. 54-2 Eco-safe Systems Limited.

## Application details

Applicant:	Eco-safe Systems Limited
Location of Activity:	1a, Allied Industrial Estate, Kylemore Road, Ballyfermot, Dublin 10
Reg. No.:	54-2
Licensed Activities under Waste Management Act 1996:	Third Schedule: Classes 11, 12, 13 Fourth Schedule: Classes 2, 3, 4, 8, 9, 11, 13
Proposed Decision (PD) issued on:	15/04/03
Objections received:	Mr Gerard Casey, Eco-safe Systems Limited (12/05/03)
Article 26 Notice sent:	19/06/03
Article 26 Submission received:	04/07/03
Inspector:	Dr. Brian Donlon

## Consideration of the objections and submissions on objections

The Technical Committee (TC) Dara Lynott (Chairperson), Damien Masterson and Mary O Hara met on 13/06/03 to consider all of the issues raised in the objection. Following on from this meeting the Committee decided that a notice under Article 26 of the Waste Management (Licensing) Regulations, (S.I. 185 of 2000) should be issued enabling the objector to make a further submission in relation to matters that were raised in the Objection. This report details the Committee's comments and recommendations following the examination of the objection and the subsequent submission received.

## OBJECTIONS

### **Objection From Mr Gerard Casey, Eco-safe Systems Limited**

*Objection 1, Item 1 – The applicant objects to the quantity of Hazardous waste to be accepted at the facility and requests that the volume stated in Schedule A of the PD be increased from 480 tpa to 5,000 tpa.*

### **Technical Committee's Evaluation**

It would appear that the recommendation of the Inspector regarding waste quantities to be accepted at the facility was based on the equipment and storage capacity presented in the application. The objection provided additional information on additional equipment and

storage capacity but was lacking in the detail required by the Committee to come to a recommendation. This additional detail was requested in an Article 26 notice to the applicant. Following the committee's review of the submission under Article 26, the Committee are satisfied that the containers proposed for bunds A,B,C and D in addition to the Asbestos Container will allow for an increase of waste handling capacity from the current figure in schedule A of the PD of 480 tpa to the proposed figure of 4,025tpa. In addition the committee agreed to the proposed reduction in non-hazardous waste to be received at the facility from the current figure in schedule A of the PD of 6,000tpa to the proposed figure of 500tpa, given the increase in the other waste category volumes.

The total annual capacity of the static autoclave is 260tpa and therefore the Committee recommends this figure as the overall tonnage for the waste treated in the static autoclave (comprising obsolete mechanical waste, hepa filters and surgical equipment). This will remove the need to set limits for the individual waste categories.

***Recommendation***

**Amend Schedule A as outlined below**

*Objection 1, Item 2 – The applicant objects to the quantity of healthcare waste to be accepted at the facility and requests that the volume stated in Schedule A of the PD be increased from 3,000 tpa to 7,072 tpa.*

**Technical Committee's Evaluation**

As above, the objection provided additional information on additional equipment capacity but was lacking in the detail required by the Committee to come to a recommendation. This additional detail was requested in an Article 26 notice to the applicant. Following the committee's review of the submission under Article 26, the Committee is satisfied that the duplication of the rotoclaves and increased shifts will allow for an increase of waste handling capacity at the facility. The Committee recommends an increase from the current figure in schedule A of the PD of 3,000 tpa (Comprising used sharp instruments, infected or potentially hazardous health care waste and laboratory waste) to the proposed figure of 7,072 tpa. With regard to odour abatement the PD requires that emission abatement equipment have to be agreed with the Agency under the Specified Engineering Works condition. The Committee is satisfied that the installation of negative air pressure system and abatement system agreed with the Agency will cater for any additional odours associated with the proposed waste reception area.

***Recommendation***

**Amend Schedule A as outlined below**

# SCHEDULE A Waste Acceptance

*Table A.1 Waste Categories and Quantities*

WASTE TYPE	MAXIMUM (TONNES PER ANNUM)
Used sharp instruments, Infected or potentially hazardous health care risk waste Laboratory waste	7,072
HEPA filters <sup>Note 1</sup> Obsolete Mechanical Equipment <sup>Note 1</sup> Surgical Equipment <sup>Note 1</sup>	260
<b>TOTAL</b>	<b>7,332</b>

**Note 1:** These waste types may be treated in the Static Autoclave as detailed in the Commissioning Trials.

*Table A.2 Other Wastes Acceptable at the Facility*

WASTE TYPE	MAXIMUM (TONNES PER ANNUM)
Non-Hazardous Wastes	500 <sup>Note 1</sup>
Hazardous Wastes (types as listed in Attachment D3 - Activity 5 of the application form)	4,025
<b>Total</b>	<b>4,525</b>

**Note 1:** This includes Confidential Records, Bank Records, Insurance Details and Patient Files only.

Signed:

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Dara Lynott  
Technical Committee Chairperson