



Oxygen

working for a cleaner environment

*Oxygen Environmental Ltd.*

Waste Licensing  
Waste Recovery/Disposal Activities  
(Other than Landfill Sites)

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Section I

*Management Plans*



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Section I1

*Conditioning Plan*

## I.1 CONDITIONING PLAN

A Conditioning Plan is not required for this waste transfer and processing facility.

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Section I2

*Environmental Management System*

## I.2 ENVIRONMENTAL MANAGEMENT SYSTEM

Oxygen Environmental Ltd. will develop and implement an Environmental Management System (EMS) for the facility once it is operational. The EMS will include as a minimum the following: -

- Management Structure,
- Communications Programme,
- Corrective Action Procedures,
- Environmental Management Programme,
- Schedule of Targets and Objectives,
- Awareness and Training Procedures,
- Document Control Procedures,
- Emergency Response Procedure.

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**Section J**

***Environmental Monitoring***



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Section J1

*Dust*

## J.1 DUST

Dust monitoring will be carried out at the facility at the locations and frequency specified in the waste licence. Oxygen Environmental Ltd. proposes to use the four monitoring locations shown on Drawing No. J.1, which will be monitored annually.

### **Sampling Methodology**

The Bergerhoff Dust Deposition Gauge will continue to be used for dust deposition sampling. The Bergerhoff Dust Deposition Gauge consists of a plastic collecting vessel and a stand with a protecting cage. The vessel is placed in the metal basket which is positioned at a height of between 1.5 and 2 meters above ground level according to the German Standard Method VDI 2119 (Measurement of Dustfall, Determination of Dustfall using Bergerhoff Instrument (Standard Method) German Engineering Institute).

Prior to sampling, the collecting vessels will be carefully cleaned with laboratory detergent and then deionised water and allowed to dry. Sampling will involve placing the labelled containers in the protecting cages. Following exposure for a specific number of days, the sampling bottles will be securely capped and returned to the laboratory for analysis.

### **Analysis**

All samples returned to the laboratory will be stored at 2-8°C. Subsequent analysis of all samples will be carried out gravimetrically for dust and strictly follow the standard VDI 2119. The results will be expressed in mg/m<sup>2</sup>/day.





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Section J2

*Ecological*

**J.2 ECOLOGY**

It is not proposed to carry out any further ecological surveys at the site.

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Section J3

*Groundwater*

**J.3 GROUNDWATER**

Oxigen Environmental Ltd. do not propose to conduct groundwater monitoring on the site as there are no direct or indirect emissions to groundwater from the facility.

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Section J4

*Air*

**J.4 AIR**

Details of the baseline air survey completed as part of this licence application are included in Attachment C.1. Oxygen Environmental Ltd. propose to install dust extractor units within each of the buildings. Emissions from these extraction units shall be monitored on an annual basis. Details of the extractor units, including the specifications, locations and proposed monitoring locations shall be submitted to the Agency prior to installation at the facility.

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Section J5

*Sewer Discharge*

**J.5 SEWER DISCHARGE**

Discharges to sewer will be monitored monthly using a flow proportional sampler and flow meter at SE-1. The effluent will be analysed for the following parameters (unless otherwise specified in the Waste Licence): -

- pH,
- Temperature,
- Biochemical Oxygen Demand,
- Chemical Oxygen Demand,
- Suspended Solids,
- Oils, Fats and Greases,
- Phosphate.

Monitoring will be carried out at SE-1 as shown on Drawing No. J.1.

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Section J6

*Meteorological Data*

## J.6 METEOROLOGICAL DATA

Meteorological data is included within section 3.9 of the attached Environmental Impact Statement. Meteorological data will be acquired from Met Eireann and will be based on the recording station at Casement Aerodrome.

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Section J7

*Noise*

## J.7 NOISE

Background noise monitoring was carried out at the facility at the locations specified shown on Drawing No. J.1. The results are included and discussed in Attachment C.8.

Taking into account the location of the site in relation to the nearest dwelling and the results of the monitoring programme undertaken by Bord na Mona, which indicated that the noise generated at the facility will not have any undesirable effects on the existing neighbouring environment, Oxigen Environmental Ltd. proposes to conduct a noise survey annually at the locations shown on Drawing No. J.1. The scope of the noise monitoring report will be agreed in advance with the Agency.

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Section J8

*Odours*

**J.8 ODOURS**

It is not proposed to carry out any odour monitoring at this time. In the event of complaints from the public relating to odour or a direct request by the Agency, odour monitoring will be undertaken.

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Section J9

*Surface Water*

## J.9 SURFACE WATERS

The proposed surface water monitoring locations are shown on Drawing No. J.1. SW-1 is located after the oil interceptor at the discharge point to the Ballymount Industrial Estate Surface Water Sewer which ultimately discharges to the Ballymount stream.

The range of parameters analysed for will be as set in the Waste Licence conditions but may include:

- pH,
- Biochemical Oxygen Demand,
- Chemical Oxygen Demand,
- Suspended Solids,
- Ammonia,
- Phosphate

It is proposed to conduct surface water monitoring on a quarterly basis.

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# Placeholder

This page has been inserted to indicate that content has been extracted from this location in the document and has been stored in a separate file.  
(This is due to file size issues.)

The extracted content can be found in the following electronic pdf file:

**Application Form-Drawing-5**

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Section K

*Contingency Arrangements*

## **K.1 CONTINGENCY ARRANGEMENTS**

Attachment K.1 is separated into three sections: -

- A Fire fighting procedures.
- B Contingency arrangements in case of breakdown or emergency situations.
- C Contingency arrangements in case of contamination of air, surface water, ground water or other environmental media.

### **K.1.a Fire fighting procedures**

In the unlikely event of a fire at Oxygen Environmental Ltd. site, there is a telephone system on site which should ensure instant contact with the emergency services. Emergency response contact numbers site i.e. fire brigade, Gardaí, ambulance and other agencies are posted in prominent positions.

Oxygen Environmental Ltd. have employed a number of fire prevention measures at the facility. These include:

- Fire extinguishers are strategically placed throughout the site namely at the door of each section of the operations building and within the office area. At each point there is a foam and powder extinguisher. Three fire hydrants are located within the site, which is connected to the water mains.
- Oxygen Environmental Ltd. trucks and/or plant equipment entering or operating on-site carry fire extinguishers
- All staff are trained in fire prevention and control measures
- The amount of waste held on site is kept at a minimum
- All waste that is held on site is either compacted in a sealed container or at a minimum covered.

As part of the Environmental Management System (see section I.2), an Emergency Response Procedure shall be implemented at the facility which will incorporate fire fighting.

#### **K.1.b Contingency arrangements in case of breakdown or emergency situations.**

Breakdown of equipment will be handled by prompt repair and/or replacement of equipment. Equipment on site is maintained on a regular basis. Oxigen Environmental Ltd will employ fully trained maintenance staff who will be required to promptly repair any plant or vehicle on site. Plant and vehicle parts (especially those that are not available in Ireland) shall be stored on site in sufficient quantities as to facility any breakdown scenarios.

Emergencies of an accidental nature during normal working hours will be handled by calling the Gardaí, the Fire Brigade or Ambulance Services. The site will be operational twenty four hours a day (with the exception of mechanical devices), seven days a week, therefore maintenance personnel or users will be on site at key times, ensuring that any accidents shall be dealt with in a timely manner..

#### **K.1.c – Contingency arrangements in case of contamination of Environmental Media**

The proposed facility will be a contained site. Spillages should not occur at the site, as all deliveries of waste shall be emptied within the contained building. Newly installed leachate containment provisions will ensure that unauthorised release of such liquids into the surface water network will not occur. Contained leachate is disposed of via County Council sewer to be treated at Ringsend Wastewater Treatment facility.

Fuel tanks are bunded, with a safe kerb which contain any spillage or leakages during delivery. There will be a manually activated stop valve on the surface water drainage system which will enable discharges to be stopped in the event of a spillage on-site.

As part of the Environmental Management System (see section I.2), an Emergency Response Procedure shall be implemented at the facility which will incorporate spill containment. Spill kits are located at strategic locations within the facility, with all staff trained in spill containment procedures.



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Section L

*Statutory Requirements*



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Section L2

*Technical Competence and Site  
Management*

## **L.2 TECHNICAL COMPETENCE AND SITE MANAGEMENT**

The preliminary management structure for the proposed facility is detailed hereunder:

- **Managing Director** Mr. Sean Doyle & Mr. Sean Rooney
- **Facility Manager:** To be appointed
- **Deputy Facility Manager:** To be appointed
- **Plant Manager/Supervisor:** To be Appointed
- **General Operatives:** To be Appointed
- **Administration Staff:** To be Appointed

The main responsibility of the facility manager will be to ensure that operations within the site are conducted efficiently and without adversely impacting on the surrounding environment. The site manager will be responsible for ensuring that Oxygen Environmental Ltd complies with all emission standards which may be specified in the waste licence and issuing all reports to the regulatory body (i.e. South Dublin County Council or Environmental Protection Agency) within the timeframes as outlined within the specified waste permit/licence. Any environmental complaints arising from activities at the site will be dealt with by the site manager. In the event of an environmental incident it will be the responsibility of the site manager to report same to the Agency at the earliest available opportunity.

The site manager, in conjunction with the plant operator, will be responsible for ensuring that all waste accepted on-site complies with the waste acceptance criteria and the waste licence conditions

The plant operator will be responsible for the operation of the plant to maximise the waste recovery percentages and to ensure that the processing of waste is undertaken with minimal environmental impacts.

General operatives will be appointed to oversee housekeeping on-site.

Administration staff will also be employed to ensure proper record keeping of all waste loads etc.

Final details of the staff numbers, positions and qualifications will be submitted to the Agency in accordance with the conditions of the licence.



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Section L3

*Financial Provision*



### **L.3 FINANCIAL PROVISION**

Copies of the two most recent years audited accounts are included in this attachment.

Attached is a fully costed Environmental Liabilities Risk Assessment for the waste transfer and processing facility located at Ballymount Industrial Estate.

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Corus Site Cashflow for EPA Licence  
Discounted at 3%

	1	0.971	0.971	0.971	0.971	0.943	0.943	0.943	0.943	0.915	0.915	0.915	0.915	0.888	0.888	0.888	0.888	0.863	0.863	0.863	0.863	Total
	2004	2006	2006	2006	2006	2006	2006	2006	2006	2007	2007	2007	2007	2008	2008	2008	2008	2009	2009	2009	2009	For Period
	Qrt4	Qrt 1	Qrt2	QRT3	Qrt4	Qrt 1	Qrt2	Qrt3	Qrt4	Qrt 1	Qrt2	Qrt3	Qrt4	Qrt 1	Qrt2	Qrt3	Qrt4	Qrt 1	Qrt2	Qrt3	Qrt4	
Opening Balance	-	1,091,405	3,193,136	2,858,486	2,446,837	2,099,897	3,516,912	2,978,199	2,388,438	1,830,990	2,920,763	2,168,232	1,312,689	528,633	1,370,011	548,603	350,746	1,171,326	336,130	1,234,634	2,222,081	
Inflow	449,460	2,088,667	3,507,275	3,507,275	3,507,275	4,024,137	4,740,381	4,753,891	4,781,320	4,850,739	5,267,269	5,267,269	5,267,269	5,206,100	5,379,056	5,379,056	5,379,056	5,274,960	5,359,117	5,359,117	5,359,117	94,707,794
Outflow																						
Wages	- 109,716	- 221,759	- 234,294	- 221,447	- 221,447	- 223,177	- 227,234	- 241,756	- 241,756	- 234,577	- 250,011	- 250,988	- 250,998	- 243,591	- 257,329	- 258,207	- 258,207	- 250,937	- 267,448	- 268,503	- 268,503	- 5,001,893
Oil & Fuel	- 1,688	- 5,465	- 7,021	- 7,958	- 8,522	- 8,648	- 8,911	- 12,542	- 14,332	- 14,150	- 14,484	- 14,771	- 14,861	- 14,423	- 14,719	- 15,051	- 15,144	- 14,717	- 15,020	- 15,359	- 15,453	- 253,239
Maintenance	- 25,967	- 77,685	- 80,539	- 81,059	- 81,059	- 79,911	- 82,327	- 82,327	- 82,327	- 81,319	- 84,237	- 84,237	- 84,237	- 82,386	- 83,673	- 83,673	- 83,673	- 82,621	- 85,267	- 85,267	- 85,267	- 1,679,059
Bank Loan & interest payments	- 428,391	- 431,067	- 429,544	- 430,402	- 428,867	- 423,457	- 429,705	- 428,232	- 426,586	- 426,589	- 424,792	- 422,995	- 421,199	- 420,096	- 418,159	- 416,222	- 414,285	- 412,687	- 410,616	- 408,545	- 277,292	- 8,729,729
Insurance	- 290,000	- 1,128,545	-	-	-	- 1,202,667	-	-	-	- 1,278,392	-	-	-	- 1,358,862	-	-	-	-	-	-	-	- 6,705,423
EPA Licence & Other fees & licences	- 107,750	- 228,064	- 7,647	- 7,647	- 7,647	- 270,965	- 7,797	- 7,797	- 7,797	- 284,468	- 7,566	- 7,566	- 7,566	- 276,074	- 7,343	- 7,343	- 7,343	- 258,801	- 7,136	- 7,136	- 7,136	- 1,548,087
Vat	- 89,521	- 308,354	- 393,784	- 393,525	- 393,448	- 487,791	- 539,622	- 542,257	- 543,610	- 576,800	- 600,966	- 600,877	- 600,865	- 603,857	- 613,919	- 613,823	- 613,811	- 606,265	- 610,913	- 610,815	- 612,823	- 10,954,648
Dumping Costs	- 266,716	- 1,117,838	- 1,120,205	- 1,120,205	- 1,130,619	- 1,621,237	- 1,621,237	- 1,639,272	- 1,639,272	- 1,772,235	- 1,772,235	- 1,772,235	- 1,772,235	- 1,780,113	- 1,794,227	- 1,794,227	- 1,794,227	- 1,764,361	- 1,718,622	- 1,718,622	- 1,718,622	- 32,448,560
Transportation Costs	- 50,250	- 430,639	- 606,875	- 606,875	- 606,875	- 810,509	- 919,425	- 919,425	- 919,425	- 958,219	- 990,773	- 990,773	- 990,773	- 1,000,582	- 1,026,320	- 1,029,525	- 1,029,525	- 1,000,541	- 1,000,541	- 1,000,541	- 1,000,541	- 17,888,951
Site costs	- 51,000	- 11,000	- 71,500	- 11,000	- 71,500	- 12,100	- 78,650	- 12,100	- 78,650	- 13,310	- 86,515	- 13,310	- 86,515	- 14,641	- 95,167	- 95,167	- 95,167	- 16,105	- 104,683	- 16,105	- 104,683	- 1,058,342
Other Costs	- 6,736	- 18,740	- 12,950	- 13,331	- 13,331	- 19,110	- 13,205	- 13,594	- 13,594	- 19,445	- 13,381	- 13,776	- 13,776	- 19,754	- 13,995	- 13,995	- 13,995	- 20,116	- 13,829	- 14,240	- 14,240	- 308,731
Administration Costs	- 98,000	- 166,527	- 166,527	- 166,527	- 166,527	- 231,035	- 231,035	- 231,035	- 231,035	- 240,188	- 240,188	- 240,188	- 240,188	- 233,100	- 233,100	- 233,100	- 233,100	- 226,538	- 226,538	- 226,538	- 226,538	- 4,487,546
Bank Overdraft Interest	- 16,129	- 46,717	- 41,741	- 35,652	- 30,495	- 50,546	- 42,519	- 33,793	- 25,488	- 40,820	- 29,590	-	-	-	-	-	-	-	-	-	-	- 393,489
Total outflow	- 1,540,865	- 4,190,398	- 3,172,626	- 3,095,626	- 3,160,336	- 5,441,152	- 4,201,668	- 4,164,129	- 4,223,872	- 5,940,512	- 4,514,738	- 4,411,726	- 4,483,212	- 6,047,478	- 4,567,548	- 4,479,807	- 4,558,475	- 6,110,147	- 4,460,612	- 4,371,670	- 4,331,098	- 91,467,694
net Inflow(outflow)	- 1,091,405	- 2,101,731	334,650	411,649	346,940	- 1,417,015	538,713	589,761	557,448	- 1,089,773	752,531	855,543	784,056	- 841,378	821,508	899,249	820,581	- 835,197	898,504	987,447	1,028,019	3,250,100
closing balance	- 1,091,405	- 3,193,136	- 2,858,486	- 2,446,837	- 2,099,897	- 3,516,912	- 2,978,199	- 2,388,438	- 1,830,990	- 2,920,763	- 2,168,232	- 1,312,689	- 528,633	- 1,370,011	- 548,603	- 350,746	- 1,171,326	- 336,130	- 1,234,634	- 2,222,081	- 3,250,100	

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Registration Number 315604

**Oxigen Environmental Limited**  
**Abridged Financial Statements**  
**for the year ended 31 March 2003**

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**Connolly Fee & McGailey**

**Chartered Certified Accountants and Registered Auditors**  
**14 The Crescent,**  
**Dundalk,**  
**Co. Louth.**

**Oxygen Environmental Limited**

**Company Information**

**Directors** Sean Rooney  
Sean Doyle

**Secretary** Sean Rooney

**Company Number** 315604

**Registered Office** 14 The Crescent,  
Dundalk,  
Co Louth.

**Auditors** Connolly Fee & McGailey  
14 The Crescent,  
Dundalk,  
Co. Louth.

**Business Address** 3 Williamsons Place,  
Dundalk,  
Co. Louth.

**Bankers** Allied Irish Bank  
73 Clanbrassil Street,  
Dundalk,  
Co. Louth.

Allied Irish Bank  
West Street  
Drogheda  
Co.Louth

**Solicitors** Ahern & McDonnell Solicitors  
Roden Place,  
Dundalk,  
Co Louth

Landwell Solicitors  
Gardner House,  
Wilton Place,  
Dublin 2

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# Oxigen Environmental Limited

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## Oxigen Environmental Limited

### Directors' Report for the year ended 31 March 2003

The directors present their report and the financial statements for the year ended 31 March 2003.

#### Principal Activity and Review of the Business

The principal activity of the company is the collection, recycling and disposal of waste, and other ancillary activities.

#### Results And Dividends

The profit for the year after providing for depreciation and taxation amounted to € 4,844,015 (2002 - € 3,185,866).

The directors do not recommend payment of a final dividend.

#### Directors

In accordance with the Articles of Association, Sean Rooney and Sean Doyle retire by rotation and, being eligible, offer themselves for re-election.

#### Health and Safety of Employees

It is the policy of the company to ensure the health and welfare of the employees by maintaining a safe place and system of work. The policy is based on the requirements of the employment legislation including the Safety Health and Welfare at Work Act 1989.

#### Directors and their Interests

The directors who served during the year and their interests in the company are as stated below:

	A Ordinary Shares		B Ordinary Shares		New Shares	
	2003	2002	2003	2002	2003	2002
Sean Rooney	521	521	-	-	1,000	1,000
Sean Doyle	-	-	521	521	1,000	1,000

There were no changes in shareholdings between 31 March 2003 and the date of signing the financial statements.

#### Directors' Responsibilities

Company law requires the directors to prepare financial statements for each financial year which give a true and fair view of the state of the affairs of the company and of the profit or loss of the company for that year. In preparing these the directors are required to:

- select suitable accounting policies and apply them consistently;
- make judgements and estimates that are reasonable and prudent;
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping proper accounting records which disclose with reasonable accuracy at any time the financial position of the company and to enable them to ensure that the financial statements comply with the Companies Acts 1963 to 2001. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.



**Auditors' Report to the Directors of Oxigen Environmental Limited  
Pursuant to Section 18(3) of the Companies (Amendment) Act 1986**

On 31 July 2003 we reported as auditors of Oxigen Environmental Limited to the directors of the company on the abridged financial statements for the year ended 31 March 2003 on pages 6 to 14 and our report was as follows:

'We have examined :

- (i) the abridged financial statements for the year ended 31 March 2003 on pages 6 to 14 which the directors of Oxigen Environmental Limited propose to annex to the Annual Return of the company ; and
- (ii) the financial statements to be laid before the Annual General Meeting which form the basis for those abridged financial statements.

The scope of our work for the purpose of this report was limited to confirming that the directors are entitled to annex abridged financial statements to the Annual Return and that those financial statements have been properly prepared pursuant to Sections 10 to 12 of the Companies (Amendment) Act, 1986 from the financial statements to be laid before the Annual General Meeting.

In our opinion the directors are entitled under Section 18 of the Companies (Amendment) Act, 1986 to annex to the Annual Return of the company the abridged financial statements and those abridged financial statements have been properly prepared pursuant to Sections 10 to 12 of that Act. (exemptions available to small/medium companies).'

On 31 July 2003 we reported as auditors of Oxigen Environmental Limited to the shareholders on the company's financial statements for the year ended 31 March 2003 to be laid before its Annual General Meeting and our report was as follows:

' We have audited the financial statements on pages 4 to 14 which have been prepared under the historic cost conventions modified by the revaluation of certain fixed assets and the accounting policies set out on page 7.

**Respective responsibilities of directors and auditors**

As described in the Statement of Directors' Responsibilities the company's directors are responsible for the preparation of financial statements in accordance with applicable law and Irish Accounting Standards.

Our responsibility is to audit the financial statements in accordance with relevant legal and regulatory requirements and Auditing Standards promulgated by the Auditing Practices Board in Ireland and the United Kingdom.

We report to you our opinion as to whether the financial statements give a true and fair view and are properly prepared in accordance with Companies Acts. We also report to you whether in our opinion: proper books of account have been kept by the company; whether, at the balance sheet date, there exists a financial situation requiring the convening of an extraordinary general meeting of the company; and whether the information given in the Directors' Report is consistent with the financial statements. In addition, we state whether we have obtained all the information and explanations necessary for the purposes of our audit and whether the company's balance sheet and profit and loss account are in agreement with the books of accounts and returns.

We report to shareholders if, in our opinion, any information specified by law regarding directors' remuneration and directors' transactions is not given and, where practicable, includes such information in our report.

We read the Directors' Report and consider the implications for our report if we become aware of any apparent misstatements within it.



**Auditors' Report to the Directors of Oxigen Environmental Limited  
pursuant to Section 18(3) of the Companies (Amendment) Act 1986**

**Basis of opinion**

We conducted our audit in accordance with Auditing Standards issued by the Auditing Practices Board. An audit includes examination, on a test basis, of evidence relevant to the amounts and disclosures in the financial statements. It also includes an assessment of the significant estimates and judgements made by the directors in the preparation of the financial statements, and whether the accounting policies are appropriate to the company's circumstances, consistently applied and adequately disclosed.

We planned and performed our audit so as to obtain all of the information and explanations which we considered necessary in order to provide us with sufficient evidence to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or other irregularity or error.

**Opinion**

In our opinion the financial statements give a true and fair view of the state of the company's affairs as at the 31 March 2003 and of its profit for the year then ended and have been properly prepared in accordance with the Companies Acts 1963 to 2001.

We have obtained all the information and explanations we consider necessary for the purposes of our audit. In our opinion proper books of account have been kept by the company. The financial statements are in agreement with the books of account.

In our opinion the information given in the directors' report on 1 is consistent with the financial statements.

The net assets of the company as stated in the Balance Sheet on page 5 are more than half of the amount of its called-up share capital and, in our opinion on that basis there did not exist at 31 March 2003 a financial situation which under Section 40(1) of the Companies (Amendment) Act 1983 may require the convening of an extraordinary general meeting of the company.'

**Directors' Responsibilities**

Company law requires the directors to prepare financial statements for each financial year which give a true and fair view of the state of the company and of the profit or loss of the company for that year. In preparing these the directors are required to

- select suitable accounting policies and apply them consistently;
- make judgements and estimates that are reasonable and prudent;
- prepare the financial statements based on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping proper accounting records which disclose with reasonable accuracy at any time the financial position of the company and to enable them to ensure that the financial statements comply with the Companies Acts 1963 to 2001. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

Connolly Fee & McGailey

Chartered Certified Accountants and  
Registered Auditors

14 The Crescent,  
Dundalk,  
Co. Louth.

Certified to be a true copy

Director

Secretary

31 July 2003

Oxigen Environmental Limited

Abridged Profit and Loss Account  
for the year ended 31 March 2003

Continuing operations

		2003	2002
	Notes	€	€
<b>Gross profit</b>		<u>32,528,002</u>	<u>20,054,215</u>
Administrative expenses		(25,802,249)	(15,762,815)
<b>Operating profit</b>	2	<u>6,725,753</u>	<u>4,291,400</u>
Interest receivable and similar income	3	46,726	22,069
Interest payable and similar charges	4	(542,570)	(439,382)
<b>Profit on ordinary activities before taxation</b>		<u>6,229,909</u>	<u>3,874,087</u>
Tax on profit on ordinary activities		(1,385,894)	(688,221)
<b>Retained profit for the year</b>		<u>4,844,015</u>	<u>3,185,866</u>
Retained profit brought forward		3,256,499	70,633
Retained profit carried forward		<u>8,100,514</u>	<u>3,256,499</u>
<b>Statement of total recognised gains and losses</b>			
<b>Profit on ordinary activities after taxation</b>		4,844,015	3,185,866
Unrealised movement on revaluation of property		<u>536,883</u>	-
<b>Total recognised gains relating to the year</b>		<u>5,380,898</u>	<u>3,185,866</u>

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The financial statements were approved by the board on 30 July 2003 and signed on its behalf by

Sean Rooney  
Director

Sean Doyle  
Director

Oxygen Environmental Limited

Balance Sheet  
as at 31 March 2003

	Notes	2003 €	€	2002 €	€
<b>Fixed Assets</b>					
Intangible assets	6	1,150,209		925,722	
Tangible assets	7	14,889,787		10,556,025	
Investment in Subsidiary	8	4,632,005		4,632,005	
		<u>20,672,001</u>		<u>16,113,752</u>	
<b>Current Assets</b>					
Debtors	9	3,992,414		3,700,169	
Cash at bank and in hand		2,696,922		1,230,558	
		<u>6,689,336</u>		<u>4,930,727</u>	
<b>Creditors: amounts falling due within one year</b>	10	<u>(9,773,948)</u>		<u>(8,542,427)</u>	
<b>Net Current Liabilities</b>			<u>(3,084,612)</u>		<u>(3,611,700)</u>
<b>Total Assets Less Current Liabilities</b>			<u>17,587,389</u>		<u>12,502,052</u>
<b>Creditors: amounts falling due after more than one year</b>	11		<u>(5,889,296)</u>		<u>(6,703,534)</u>
<b>Provision for Liabilities and Charges</b>	12		<u>(518,677)</u>		<u>-</u>
<b>Net Assets</b>			<u>11,179,416</u>		<u>5,798,518</u>
<b>Capital and Reserves</b>					
Called up share capital	13	5,082		5,082	
Share premium account	14	2,536,937		2,536,937	
Revaluation reserve	14	536,883		-	
Profit and loss account	14	8,100,514		3,256,499	
<b>Equity Shareholders' Funds</b>	15	<u>11,179,416</u>		<u>5,798,518</u>	

We have relied on specified exemptions contained in Sections 10 to 12 of the Companies (Amendment) Act, 1986 on the grounds that the company is entitled to the benefit of those exemptions as a medium-sized company. The financial statements were approved by the Board on 30 July 2003 and signed on its behalf by

Sean Rooney  
Director

Sean Doyle  
Director  
Certified to be a true copy

Director

Secretary

Oxygen Environmental Limited

Cash Flow Statement  
for the year ended 31 March 2003

	Notes	2003 €	2002 €
<b>Reconciliation of operating profit to net cash inflow from operating activities</b>			
Operating profit		6,725,753	4,291,400
Depreciation		3,021,068	2,471,507
(Increase) in debtors		(292,245)	(3,675,560)
Increase in creditors		1,047,991	5,603,455
<b>Net cash inflow from operating activities</b>		<u>10,502,567</u>	<u>8,690,802</u>

Cash Flow Statement

Net cash inflow from operating activities		10,502,567	8,690,802
Returns on investments and servicing of finance		(495,844)	(439,382)
Taxation		(964,211)	(95,230)
Capital expenditure and financial investment		(2,499,267)	(3,980,054)
		<u>6,543,245</u>	<u>4,176,136</u>
<b>Financing</b>		<u>(3,943,872)</u>	<u>(2,223,679)</u>
<b>Increase in cash in the year</b>		<u>2,599,373</u>	<u>1,952,457</u>

Reconciliation of net cash flow to movement in net funds (Note )

Increase in cash in the year		2,599,373	1,952,457
Cash outflow from increase in debts and lease financing		3,943,872	2,223,679
Change in net funds resulting from cash flows		<u>6,543,245</u>	<u>4,176,136</u>
New finance leases		(4,543,167)	(5,022,206)
<b>Movement in net funds in the year</b>		<u>2,000,078</u>	<u>(846,070)</u>
<b>Net debt at 1 April 02</b>		<u>(7,726,154)</u>	<u>(6,880,084)</u>
<b>Net debt at 31 March 2003</b>		<u>(5,726,076)</u>	<u>(7,726,154)</u>

**Oxygen Environmental Limited**  
**Notes to the Abridged Financial Statements**  
**for the year ended 31 March 2003**

..... continued

**1. Accounting Policies**

**1.1. Accounting convention**

The financial statements are prepared under the historical cost convention modified to include the revaluation of certain fixed assets.

**1.2. Goodwill**

Acquired goodwill is written off in equal annual instalments over its estimated useful economic life of 5 years.

**1.3. Tangible fixed assets and depreciation**

Depreciation is provided at rates calculated to write off the cost less residual value of each asset over its expected useful life, as follows:

Land and buildings	-	No Depreciation Charge
Leasehold properties	-	No Depreciation Charge
Plant and machinery	-	20% Straight line
Fixtures, fittings and equipment	-	12.5% Straight Line
Motor vehicles	-	20% Straight Line
Bins	-	10% Straight line

**1.4. Leasing and hire purchase commitments**

Assets obtained under hire purchase contracts and finance leases are capitalised as tangible assets and depreciated over the shorter of the lease term and their useful lives. Obligations under such agreements are included in creditors net of the finance charge allocated to future periods. The finance element of the rental payment is charged to the profit and loss account so as to produce constant periodic rates of charge on the net obligations outstanding in each period.

**1.5. Investments**

Fixed asset investments are stated at cost less provision for diminution in value.

**1.6. Pensions**

The pension costs charged in the financial statements represent the contribution payable by the company during the year.

**1.7. Deferred taxation**

Deferred taxation is provided at appropriate rates on all timing differences using the liability method only to the extent that, in the opinion of the directors there is a reasonable probability that a liability or asset will crystallise in the foreseeable future.

**2. Operating profit**

	2003	2002
	€	€
Operating profit is stated after charging:		
Depreciation of intangible assets	345,410	231,430
Depreciation of tangible assets	2,643,019	2,259,758
Loss on disposal of tangible fixed assets	32,639	(19,681)
Auditors' remuneration	31,000	28,000
	<u>          </u>	<u>          </u>

**Oxigen Environmental Limited**  
**Notes to the Abridged Financial Statements**  
**for the year ended 31 March 2003**

<b>3.</b>	<b>Interest receivable and similar income</b>	<b>2003</b>	<b>2002</b>
		€	€
	Bank interest	46,726	22,069
		<u>          </u>	<u>          </u>

<b>4.</b>	<b>Interest payable and similar charges</b>	<b>2003</b>	<b>2002</b>
		€	€
	On bank loans and overdrafts	59,208	42,614
	Lease finance charges and hire purchase interest	483,362	396,768
		<u>542,570</u>	<u>439,382</u>

**4.1. Directors' emoluments**

		<b>2003</b>	<b>2002</b>
		€	€
	Remuneration and other emoluments	659,620	269,174
	Pension contributions	2,662,908	266,645
		<u>3,322,528</u>	<u>535,819</u>

**5. Pension costs**

The employees plan is a defined contribution scheme, as defined in the Pensions Act 1990. The directors plan is a self administered scheme. The total pension costs for the year amounted to € 2,737,986 (2002 - € 311,188)

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**Oxygen Environmental Limited**  
**Notes to the Abridged Financial Statements**  
**for the year ended 31 March 2003**

..... continued

**6. Intangible fixed assets**

	Goodwill	Total
	€	€
<b>Cost</b>		
At 1 April 2002	1,157,152	1,157,152
Additions	569,897	569,897
At 31 March 2003	<u>1,727,049</u>	<u>1,727,049</u>
<b>Provision for diminution in value</b>		
At 1 April 2002	231,430	231,430
Charge for year	345,410	345,410
At 31 March 2003	<u>576,840</u>	<u>576,840</u>
<b>Net book values</b>		
At 31 March 2003	<u>1,150,209</u>	<u>1,150,209</u>
At 31 March 2002	<u>925,722</u>	<u>925,722</u>

**7. Tangible assets**

	Land and buildings freehold	Leasehold Premises Coes Road	Plant and machinery	Fixtures, fittings equipment	Motor vehicles	Bins	Total
	€	€	€	€	€	€	€
<b>Cost/revaluation</b>							
At 1 April 2002	734,448	80,700	370,653	503,438	7,933,748	9,239,543	18,862,530
Additions	488,922	-	1,195,135	161,090	1,243,911	3,383,480	6,472,538
Revaluation	536,883	-	-	-	-	-	536,883
Disposals	-	-	-	-	(315,805)	-	(315,805)
At 31 March 2003	<u>1,760,253</u>	<u>80,700</u>	<u>1,565,788</u>	<u>664,528</u>	<u>8,861,854</u>	<u>12,623,023</u>	<u>25,556,146</u>
<b>Depreciation</b>							
At 1 April 2002	-	-	161,171	220,850	5,374,890	2,549,595	8,306,506
On disposals	-	-	-	-	(283,166)	-	(283,166)
Charge for the year	-	-	150,304	85,636	1,325,895	1,081,184	2,643,019
At 31 March 2003	<u>-</u>	<u>-</u>	<u>311,475</u>	<u>306,486</u>	<u>6,417,619</u>	<u>3,630,779</u>	<u>10,666,359</u>
<b>Net book values</b>							
At 31 March 2003	<u>1,760,253</u>	<u>80,700</u>	<u>1,254,313</u>	<u>358,042</u>	<u>2,444,235</u>	<u>8,992,244</u>	<u>14,889,787</u>
At 31 March 2002	<u>734,448</u>	<u>80,700</u>	<u>209,482</u>	<u>282,588</u>	<u>2,558,858</u>	<u>6,689,948</u>	<u>10,556,024</u>

Included in the above assets are assets held in the name of Wheelbin services Limited, a wholly owned subsidiary of Oxygen Environmental Limited.

**Oxigen Environmental Limited**  
**Notes to the Abridged Financial Statements**  
**for the year ended 31 March 2003**

..... continued

Included above are assets held under finance leases or hire purchase contracts as follows:

Asset description	2003		2002	
	Net	Depreciation	Net	Depreciation
	book value	charge	book value	charge
	€	€	€	€
Plant and machinery	459,502	141,701	278,313	77,123
Fixtures, fittings and equipment	29,105	10,583	39,688	10,583
Motor vehicles	1,861,216	1,410,899	2,537,444	1,263,965
Bins	3,479,679	507,050	2,394,332	347,810
	<u>5,829,502</u>	<u>2,070,233</u>	<u>5,249,777</u>	<u>1,699,481</u>

**8. Investments**

	Investments
	€
Cost	
At 1 April 2002	4,632,005
At 31 March 2003	<u>4,632,005</u>
At 31 March 2002	<u>4,632,005</u>

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**8.1. Investments**

The company holds 100% of the share capital of the following companies:

Company	Country of registration or incorporation	Shares held Class	Proportion
<b>Significant interests</b>			
Sean Rooney Limited	Republic of Ireland	Ordinary	100%
Wheel Bin Services Limited	Republic of Ireland	Ordinary	100%
JVC Recycling Limited	Republic of Ireland	Ordinary	50%

The principal activity of Sean Rooney Limited is the removal and processing of commercial waste.

The principal activity of JVC Recycling Limited is the recycling of waste.

All of the activities of Wheel Bin Services Limited were subsumed into the activities of Oxigen Environmental Limited from 1st April 2001.



**Oxigen Environmental Limited**  
**Notes to the Abridged Financial Statements**  
**for the year ended 31 March 2003**

..... continued

**9. Debtors**

	2003	2002
	€	€
Trade debtors	3,190,154	3,002,296
Other debtors	79,656	108,906
Prepayments and accrued income	722,604	588,967
	<u>3,992,414</u>	<u>3,700,169</u>

**10. Creditors: amounts falling due within one year**

	2003	2002
	€	€
Bank overdraft	1,763	807,004
Bank loans	138,536	183,393
Net obligations under finance leases and hire purchase contracts	2,393,403	1,262,781
Trade creditors	2,382,731	1,691,508
Amounts owed to connected companies	2,429,091	2,429,091
Corporation tax	574,833	671,827
Other taxes and social security costs	861,735	585,059
Directors' accounts	-	4,203
Accruals and deferred income	991,856	907,561
	<u>9,773,948</u>	<u>8,542,427</u>

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**Oxygen Environmental Limited**  
**Notes to the Abridged Financial Statements**  
**for the year ended 31 March 2003**

..... continued

11. Creditors: amounts falling due after more than one year	2003 €	2002 €
Bank loan	784,668	1,112,437
Net obligations under finance leases and hire purchase contracts	5,104,628	5,591,097
	<u>5,889,296</u>	<u>6,703,534</u>
<b>Loans</b>		
Repayable in one year or less, or on demand (Note 10)	138,536	183,393
Repayable between one and two years	138,536	183,394
Repayable between two and five years	415,609	550,181
Repayable in five years or more	91,987	195,467
	<u>784,668</u>	<u>1,112,435</u>

The finance companies continue to retain title to all leased assets of the business until they are discharged in full. The Bank borrowings are also secured by mortgages over the freehold properties held by the company.

**Net obligations under finance leases and hire purchase contracts**

Repayable within one year	2,393,403	1,262,781
Repayable between one and five years	5,104,628	5,591,097
	<u>7,498,031</u>	<u>6,853,878</u>

12. Provisions for liabilities and charges

Deferred tax is analysed over the following timing differences:

	Provided	
	2003 €	2002 €
Accelerated capital allowances	518,677	-
	<u>518,677</u>	<u>-</u>

Movements on the provision for deferred taxation are:

	2003 €	2002 €
At 1 April 2002	-	-
Transferred from profit and loss account	518,677	-
At 31 March 2003	<u>518,677</u>	<u>-</u>

**Oxigen Environmental Limited**  
**Notes to the Abridged Financial Statements**  
**for the year ended 31 March 2003**

..... continued

13. Share capital	2003	2002
	€	€
<b>Authorised</b>		
500,000 A Ordinary Shares of 1 cent each	635,000	635,000
500,000 B Ordinary Shares of 1 cent each	635,000	635,000
5,000 New Shares of 1 cent each	6,350	6,350
	<u>1,276,350</u>	<u>1,276,350</u>
 <b>Allotted, called up and fully paid</b>		
1,001 A Ordinary shares of € 1.27 cent each	1,271	1,271
1,001 B Ordinary shares of € 1.27 cent each	1,271	1,271
2,000 New Shares of 1 cent each	2,540	2,540
	<u>5,082</u>	<u>5,082</u>

14. Equity Reserves

	Share premium account	Revaluation reserve	Profit and loss account	Total
	€	€	€	€
<b>At 1 April 2002</b>	2,536,937	-	3,256,499	5,793,436
Revaluation of property		536,883		536,883
Retained profit for the year			4,844,015	4,844,015
<b>At 31 March 2003</b>	<u>2,536,937</u>	<u>536,883</u>	<u>8,100,514</u>	<u>11,174,334</u>
Equity interests	-	536,883	8,100,514	8,637,397
Non-equity interests	<u>2,536,937</u>	<u>-</u>	<u>-</u>	<u>2,536,937</u>

**Oxigen Environmental Limited**  
**Notes to the Abridged Financial Statements**  
**for the year ended 31 March 2003**

..... continued

**15. Reconciliation of movements in shareholders' funds**

	2003	2002
	€	€
Profit for the year	4,844,015	3,185,866
Proceeds of issue of non-equity shares	-	2,539,477
	<u>4,844,015</u>	<u>5,725,343</u>
Net proceeds of equity share issue	-	2
Other recognised gains or losses	536,883	-
	<u>5,380,898</u>	<u>5,725,345</u>
Net addition to shareholders' funds	5,380,898	5,725,345
Opening shareholders' funds	5,798,518	73,173
	<u>11,179,416</u>	<u>5,798,518</u>

**16. Approval of financial statements**

The financial statements were approved by the Board on 30 July 2003 and signed on its behalf by

Sean Rooney  
 Director

Sean Doyle  
 Director

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***ENVIRONMENTAL LIABILITIES RISK  
ASSESSMENT FOR  
OXIGEN ENVIRONMENTAL LTD.  
FACILITY AT  
BALLYMOUNT INDUSTRIAL ESTATE,  
BALLYMOUNT, DUBLIN 22.***

**REPORT NO:** ECS0797-ELRA

**ATTENTION:** Mr. James Dowdall,  
Oxigen Environmental Ltd.,  
Unit D,  
Westland Park,  
Willow Road,  
Clondalkin,  
Dublin 12.

**PREPARED BY:** Naoimh Conneely  
Environmental Consultant

**DATE:** June 2004

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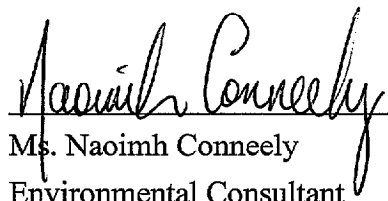
**Executive Summary**

The potential environmental impacts of the proposed waste recycling and processing facility were examined under the headings (i) Water, (ii) Soil, and (iii) Air. In determining the environmental liabilities associated with the site an environmental impact matrix was prepared on the same determining the potential impact of the facility (during operational & decommission phases).

It is considered that due to the proposed site design, housekeeping principals and waste acceptance and handling procedures, which will be adopted at the facility, that the proposed facility does not pose a significant environmental risk to ground, groundwater, surface water or air either during normal and/or emergency conditions.

The environmental liabilities identified are those considered to be restricted to the confines of the site, therefore, any costs incurred in addressing same will be restricted to the removal and safe disposal of the waste remaining on site following an emergency event (e.g. fire or spillage event) or closure of the site. The installation of an environmental liabilities pollution cover of €65,000 (in the form of bonding, financial allocation or an insurance premium) will guarantee that the liabilities arising from the activities at the site.

Respectfully submitted,

  
Ms. Naoimh Conneely  
Environmental Consultant

**TABLE OF CONTENTS**

- 1.0 INTRODUCTION**
- 2.0 DESCRIPTION OF ON-SITE ACTIVITY**
- 3.0 ENVIRONMENTAL IMPACTS – CURRENT SITUATION**
- 4.0 ENVIRONMENTAL LIABILITIES ASSESSMENT – CURRENT SITUATION**
- 5.0 COSTING OF ENVIRONMENTAL LIABILITIES IDENTIFIED**

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## 1.0 INTRODUCTION

As part of the requirements of their Waste Licence Application for their facility at Ballymount Industrial Estate, Dublin 22, Oxigen Environmental Ltd, are required to undertake a fully costed Environmental Liabilities Risk Assessment (Section L3 of Waste Licence Application).

As the proposed facility is not yet operational, this report is based on a review of all available/relevant information in relation to the proposed development, i.e. Environmental Impact Statement (EIS) and the Waste Licence Application. It is assumed that the facility will be operated in accordance with best practise and based on the information which is being submitted as part of this waste licence application.

This assessment was undertaken in order to determine the environmental liabilities associated with the proposed waste recycling and processing facility during normal and emergency situations. The assessment involved:

- Identification of proposed emissions and the impacts of same on the receiving water, soil and air environments. Impacts were assessed under normal, abnormal emergency working conditions.
- Identification of proposed control/mitigation measures (engineering works, operational procedures).

The facility has also developed a Decommissioning Plan as part of this Waste Licence application (see Attachment G.1), which requires a bond of €350,000 to be put in place for the facility. The costing therefore associated with the decommissioning will not be included in this report.

This report presents the main findings of the risk assessment and outlines the current status of the site with respect to requirements to obtain a pollution bond.



## 2.0 DESCRIPTION OF ON-SITE ACTIVITY

The principal activity of the facility will consist of the recovery of source segregated dry recyclable materials from waste sources such as municipal, industrial, construction and demolition and commercial. Other on-site activities will include the bulking of hazardous waste material, and the drying of gully sweepings. On-site operations will include segregation of waste, bailing of waste metal and paper/cardboard, shredding of timber, washing of plastics, drying of liquid road sweepings, waste storage and transfer into vehicles for removal off-site. There will be no on-site waste disposal or treatment other than those mentioned above, and the resultant material will be transported off – site. Process wastewater from the on-site treatments shall be discharged to sewer.

Only those wastes listed in Tables E.2.1, E.2.2, E.2.3 and E.2.4 of the waste licence application form will be accepted at the facility. The waste collected includes dry recyclable household waste, commercial waste, industrial waste and construction and demolition waste.

It is anticipated that in the first year of operation approximately 70,000 tonnes of waste will be accepted at the facility. It is envisaged that the waste inputs will increase over the lifetime of the facility to a maximum annual throughput of approximately 350,000 tonnes. Market conditions will dictate the actual volumes of waste accepted. The timescale for achieving the maximum volume is dependent on market conditions, but is expected to be reached within three years of commissioning.

The facility will accept waste between the hours of 06.00 and 2200 Monday to Saturday, with operations on Sunday and public holidays restricted to off peak waste recovery vehicles such as road sweepers etc.. The operational hours of the proposed facility will be twenty four hours a day, seven days a week, though the operation of machinery shall be restricted to between 06:30 to 23:30. Waste will not be removed from the facility after 22:00.

### 3.0 ENVIRONMENTAL IMPACTS – CURRENT SITUATION

The environmental impacts of the proposed waste recycling and processing facility were examined under the following headings:

- Water
- Soil
- Air

In determining the information required to determine the environmental liabilities associated with the site an environmental impact matrix was prepared. The matrix predicts the likely impacts of the existing development on the various categories listed above. Table 3.1 presents the matrix from which the scope of this study was established. The risks associated with each environmental effect are rated by the use of three gradings from low (minimal or no risk of such an environmental effect existing) to medium (medium risk of such an environmental effect existing) to high (high risk of such an environmental effect existing).

#### (i) Water

There is no surface water body located within the waste recycling and processing facility.

Surface water run-off from hardstanding areas discharges to a stormwater sewer serving the Ballymount Industrial Estate. This stormwater sewer ultimately discharges to the River Camac. All surface water discharges from the site will take place through an oil interceptor which will have an automatic shut-off valve.

Fuel storage tanks on site will be fully bunded i.e. areas designed to conform to standard bunding specifications (110 % of the capacity of the largest tank).

Inspections of the drainage system, bunds, silt traps/interceptor tanks, oil interceptors and spill kits will be undertaken at the facility as part of the Environmental Management System to ensure no debris or deposited material builds up thus decreasing their effectiveness.

The good housekeeping principals, waste acceptance and handling procedures and mitigation measures as detailed in the Waste Licence application will be adopted at the facility and this will ensure that inputs to, and subsequent contamination of groundwater and surface water environments will not occur during normal and/or emergency conditions. An Emergency Response Procedure will be maintained at the facility as part of the Environmental Management System to ensure appropriate procedures are in place to respond to potential emergency situations occurring at the facility including environmental accidents and or

emergencies to ensure minimal impacts on the environment occurring in such emergency situations. These will include Spill Clean Up Procedure, general fire/explosion procedure, flooding procedure, malicious damage procedure, and unforeseen emergency procedure.

In the event of decommissioning and closure of the waste recycling and processing facility all waste materials, fuel etc will be transported off site and treated and/or disposed of by an appropriate licensed waste contractor. Subsequently the potential for the generation of residual contaminants and possible contamination of groundwater and surface water environments at the site is removed. (refer to section G .1 Decommissioning Plan)

(ii) Soil

All waste handling and storage will be undertaken either within the designated recycling plant building, within contained hardstanding areas or within specially designed holding tanks. Waste acceptance and handling procedures and the BAT principles which will be adopted at the facility shall ensure that emissions to ground (with the exception of clean rainwater runoff) do not occur, therefore, contamination of the subsurface is not likely to occur during normal and/or emergency (material spillage or fire event) situations.

In the event of decommissioning and closure of the waste recycling and processing facility, all waste materials will be transported off site and treated and/or disposed of by an appropriate licenced waste contractor. Subsequently the potential for the generation of residual contaminants and possible contamination of soil environments at the site is removed (refer to section G .1 of the waste licence application Decommissioning Plan)

(iii) Air

Noise levels in the vicinity of the site were measured as part of the baseline monitoring at the site (refer to waste licence application). Daytime noise levels at the site ranged between 55.8 and 65.7 dB  $L_{Aeq}$  30 mins and were mainly due to the large volume of vehicles using the roads within the industrial estate. It is considered that the level of noise increase from the proposed operations at the facility is likely to be minimal and therefore it is contended that the current noise level and character will not change to any significant degree. Mitigation measures will be adopted at the facility to ensure no impacts will occur resulting from on-site activities.

Dust emissions at the site emanate from the movement of vehicles into and on the site. However these are considered minor dust emissions and should not cause a nuisance for the nearest sensitive receptor to the site. Good site practices and the implementation of mitigation measures (as detailed in the waste licence application) will ensure the dust generated on the site will not impact on the surrounds of the facility.

Waste acceptance and handling is carried out within the designated recycling plant buildings with no waste stored outside the buildings at any time. It is proposed to install air rotary atomisers to aid with the suppression of dust and odour. Therefore the potential for the generation of odour nuisance within the environs of the facility are therefore minimised.

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**TABLE 3.1: SUMMARY OF THE RISKS ENVIRONMENTAL IMPACTS OF WASTE RECYCLING AND PROCESSING FACILITY DURING OPERATION AND DECOMMISSIONING PHASES**

Environmental Medium	PREDICTED RISK	
	Operation Phase	Decommissioning Phase
<b>Water</b>	<p>Ground Water Pollution: Low Surface Water Pollution: Low</p> <p>Risk of groundwater &amp; surface water contamination due to spillage and/or fire event removed due to proposed on-site bunding (individual areas locally banded)</p>	<p>Ground Water Pollution: Low Surface Water Pollution: Low</p> <p>All waste &amp; chemicals to be transported off site. Construction (hardstanding areas) and operation of facility according to the BATNEEC principle should combine to ensure minimal residual contamination remains on decommissioning and closure of the site.</p>
<b>Soil</b>	<p>Soil Pollution: Low</p> <p>Construction (hardstanding areas) and operation of facility according to the BATNEEC principle combine to ensure contamination of the subsurface will not occur during normal and emergency situations.</p>	<p>Soil Pollution: Low</p> <p>All waste &amp; chemicals to be transported off site. Construction (hardstanding areas) and operation of facility according to the BAT principle should combine to ensure minimal residual contamination remains on decommissioning and closure of the site.</p>
<b>Air</b>	<p>Air Pollution: Low</p> <p>Minor dust emissions from movement of traffic. Air rotary atomisers to suppress dust and odour within buildings</p>	<p>Air Pollution: Low</p> <p>All waste &amp; chemicals to be transported off site. Construction (hardstanding areas) and operation of facility according to the BAT principle should combine to ensure minimal residual contamination remains on decommissioning and closure of the site</p>

#### **4.0 ENVIRONMENTAL LIABILITIES ASSESSMENT – CURRENT SITUATION**

It will be the policy of Oxygen Environmental Ltd, to conduct its business of waste acceptance, storage, processing and transfer at the waste recycling and processing facility in such a manner that associated activities minimise or eliminate any potential adverse effects on the environment. A number of Environmental Procedures will be adopted at the facility as part of the Environmental Management System to ensure the impact of the facility on its environs is minimal. This EMS will be prepared for the facility and once installed it shall be maintained to ensure effective management of the site and protection of the environment (soil, surface water, groundwater, air environments).

There are no major emissions/discharges to ground (apart from clean surface water run-off), emissions to surface water nor emissions to atmosphere arising from operations currently taking place at the waste recycling and processing facility.

The good housekeeping principles and waste acceptance and handling procedures that will be adopted at the facility shall ensure that inputs to, and subsequent contamination of groundwater and surface water environments will not occur during normal and/or emergency conditions. It is contended that the risk of environmental contamination as a result of the existing activities at the Oxygen Environmental Ltd waste recycling and processing facility are minimised or eliminated by adherence to the existing protection programmes. Likewise the environmental liabilities arising from accidental or emergency situations during normal operations and/or abnormal conditions are considered to be minimal. In the event of decommissioning and closure of the waste recycling and processing facility all waste materials will be transported off site and treated and/or disposed of by an appropriate licenced waste contractor. Subsequently the potential for the generation of residual contaminants and possible contamination of soil, water (groundwater, surface water) and air environments at the site is removed. (see Section G.1 Decommissioning Plan)

The environmental liabilities identified are those considered to be restricted to the confines of the site, therefore, any costs incurred in addressing same will be restricted to the removal and safe disposal of the waste remaining on site following an emergency event (e.g. fire or spillage event) or closure of the site. It may, therefore, be necessary to install environmental liabilities cover in order to guarantee that the impacts arising from any environmental accident occurring during the operation phase of the site or on decommissioning and closure of same are minimised or eliminated. Such an insurance bond should cover the cost for the

clean-up and removal of the maximum amount of waste that may be stored on-site at any given time.

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## **5.0 COSTING OF ENVIRONMENTAL LIABILITIES IDENTIFIED**

The environmental liabilities are those considered to be restricted to the confines of the site, therefore, any costs incurred in addressing same will be limited to the removal and safe disposal of the waste remaining on site following an emergency event (e.g. fire or spillage event) or decommissioning and closure of the site. Such environmental liabilities cover should account for the cost for the clean-up and removal of the maximum amount of waste that may be stored on-site at any given time.

The cost for the clean-up of the maximum amount of waste that may be stored on-site at any given time and the removal/transport (by Oxigen Environmental Ltd.) costs for this quantity of waste are estimated at €65,000. The installation of an environmental liabilities pollution cover of €65,000 (in the form of bonding, financial allocation or an insurance premium) will guarantee that the liabilities arising from any environmental accident occurring during the operation phase of the site is financially provided for.

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