

ELRA & Closure Plan

Attachment K1

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K1 ENVIRONMENTAL LIABILITIES RISK ASSESSMENT & CLOSURE PLAN

K1.1 OVERVIEW

This document presents the preliminary Environmental Liability Risk Assessment (ELRA) and Site Closure Plan for the Waste Electrical and Electronic Equipment (WEEE) sorting and recovery facility located at Unit 51 Park West Industrial Park, Nangor Road, Dublin 12 in the Republic of Ireland (the Site).

This preliminary ELRA and Site Closure Plan has been prepared in support of the Waste Licence Application made by *TechRec Ireland Ltd* (the Operator) for the aforementioned facility. It is proposed that once the facility obtains its Waste Licence, the ELRA and Closure Plan will be reviewed annually as part of the Site's anticipated Licence conditions.

The primary activity to be undertaken under the Waste Licence (as per the *Fourth Schedule of the Waste Management Act*) is Class 3 - "Recycling or reclamation of metals and metal compounds", with the secondary activity being Class 13 - "Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced". The site aims to process up to 30,000 tonnes of WEEE per year and store a further 8,000 tonnes per year (for subsequent offsite processing).

This ELRA and Site Closure has been prepared with reference to the EPA *Draft Guidance Documents and Assessment Tools on Environmental Liabilities Risk Assessment and Residuals Management Plans incorporating Financial Provision Assessment (OEE-04-03)*.

K1.2 OBJECTIVES

The Objectives of this preliminary ELRA and Site Closure are to:

- Identify risks associated with the operation of the facility and risk mitigation measures where risk levels are considered to be unacceptable;
- Outline the steps to be taken to ensure that the Site is returned in a clean and safe condition on closure; and
- Identify environmental liabilities at the site for reasonably foreseeable operational and closure scenarios, to allow for the arrangement of suitable financial provisions.

This preliminary ELRA focuses on the assessment of known, operational risks, which would typically be associated with uncontrolled emissions or events at

the Site. It is considered highly unlikely that there will be any unplanned/ unforeseen risks associated with the closure of the facility, as there are no underground tanks, pits, sumps, process pipelines etc, no process wastewater emissions, and no onsite treatment or disposal of waste products.

As the Site has been designated a 'low risk' activity, (refer *Section 3* of this document), a Post-closure/ Aftercare Management Plan is not necessary under the terms of the EPA Guidance document.

A revised ELRA and Closure Plan will be submitted in 12 months time as part of the conditions of the Site's future Waste Licence. This can include the potential for unknown/unplanned risks and post closure management if deemed necessary by the Agency.

K1.3 SCOPING STATEMENT

It is envisaged that the Site would be returned to a 'clean' state on closure, which would be suitable for similar ongoing, light industrial land use. It is further anticipated that there would be no significant residual environmental liabilities on closure of the Site.

The format of this preliminary ELRA and Closure Plan is as follows:

- Section K2: Site Description & History;
- Section K3: Overall Site Risk Category;
- Section K4: Preliminary Operational Risk Identification, Assessment & Mitigation;
- Section K5: Site Closure Programme;
- Closure Criteria;
 - Preliminary Closure Plan;
 - Cost Estimates for Closure; and
 - Validation & Testing of Closure Plan.
- Section K6: Financial Provisions – some commercially sensitive information has been submitted separately as an Annex.

K2 SITE DESCRIPTION & HISTORY

K2.1 PROCESS DESCRIPTION

The Site currently accepts all categories of Waste Electrical and Electronic Equipment (WEEE) as specified in the First Schedule of the *Waste Management (Waste Electrical and Electronic Equipment) Regulations 2005*, S.I. No. 340 of 2005.

The process involves the manual sorting and dismantling of incoming WEEE and its subsequent automated and manual separation into its component fractions. The process is dry and does not involve the generation of any process effluent. However, some items of WEEE may need to be drained of oil or water prior to processing.

There are two proposed point source air emissions, which potentially vent low levels of from particulates from the dust abatement systems. There are also a number of equipment items which vent treated air emissions inside the building.

The process is divided into four modules which are described in more detail in *Attachment D2* and are summarised as follows:

- Module 1 – Goods receipt, sorting, dismantling and cathode ray tube (CRT) processing;
- Module 2 – Preliminary breakdown and separation;
- Module 3 – Secondary breakdown and mechanical separation; and
- Module 4 – Fine separation.

Segregated recovery of up to 96% of WEEE received at the Site is anticipated on commencement of the activity, and this percentage will increase as the process is refined. The final products from the process include:

- non-metallic materials (e.g. plastic and CRT glass which is separated into two streams);
- metallic material including iron (Fe) and aluminium (Al);
- mixed precious metals (non-ferrous II) e.g. gold (Au), silver (Ag) and platinum (Pt); and
- other non-ferrous metals e.g. copper (Cu), zinc (Zn) and brass.

It is intended that all of the recovered metals will be sold back to processing facilities as raw feed stock and that the plastic will be recycled further at another facility.

Additional information regarding the Site Description is available in the Environmental Report (*Attachment I*) submitted in support of the Waste Licence Application.

K2.2 SITE DESCRIPTION

The activity is located at unit 51, Park West Industrial Park, Nangor Road, Dublin 12. *Drawing 01* of the Licence Application shows the location of the industrial park within the Dublin City area. The Park West Estate has been developed specifically for the integration of residential and industrial activities and has been zoned under Dublin City's Development Plan as "Zone Z6 – To provide for the creation and protection of enterprise and facilitate opportunities for employment creation".

The Site is located off Henry Rd within the Park West Industrial Estate, approximately 8.5km south-west of Dublin City Centre and within 1.5km of the M50/Naas Road interchange. The Park is accessed via the Nangor Road and Killeen Road, which are directly connected to the Naas Road. The nearest surface water body is the River Cammock, located 800m to the south-east. The Grand Canal is located approximately 850m to the south of the site. The nearest residential premises are located approximately 160m south-east of the site.

The subject property comprises a detached hi-bay warehouse / industrial facility incorporating two-storey office accommodation and profile onto Henry Road. The building is of a steel portal frame-construction and is finished externally with part-rendered blockwork, part pre-coated insulated steel cladding, with a power floated finished concrete floor. The roof is comprised of a twin skin insulated metal deck with 20% Perspex roof panels. The building has an eaves height of approximately 10m (32ft).

There are four dock level loading doors and three roller shutter doors. The office accommodation, canteen area is finished with lino flooring, plastered and painted walls and lighting throughout. The estimated gross external floor area is as follows:

- Warehouse: 3,551m²
- Two-storey offices: 121m²
- Total: 3,672m²

There are no current or historical underground storage tanks, pits, sumps or process pipelines. There is no generation of process wastewater and no onsite treatment or disposal of waste.

Park West has an onsite rail station, good quality bus routes and 24-hour security. The site is surrounded by other industrial activities which are shown on *Drawing 01* of the Licence Application.

Geology

During the original redevelopment (*Harcourt Development Ltd.* 1999 - 2001), the Site was subject to significant landscaping with onsite material being used to level the ground prior to the foundations being laid. Therefore the upper

layers (0.5 – 2m) of soil are characterised by gravelly clay fill due to the demolition of the previous buildings and earth works that have been carried out to the area. Stiff grey/brown boulder clay lies beneath the fill and the area is generally dominated by natural boulder clays. Characteristically, boulder clays have a low permeability rate (10^{-7} to 10^{-10} m/s) and would act as a natural barrier to the migration of water from the surface to the lower strata/bedrock. Historical maps indicated that the area was poorly drained and in some cases marshy. Rough field permeability tests carried out on a site 200m east of Killeen Road indicated that the fill material had a high clay content and low permeability.

The Site is situated at the centre of a Carboniferous basin referred to as the Dublin Basin. The underlying rocks form part of the Calp Formation, which is comprised predominantly of a limestone rock referred to as “Dinantian Upper Impure Limestone”. The depth to bedrock in the area is generally reported to be between 5-10m below ground level. Faults in the bedrock are not recorded within 2 km of the site.

The Geological Survey of Ireland gas classified the Calp Limestone bedrock as a ‘locally important aquifer which is generally moderately productive’. Groundwater flow direction has not been definitively established however, the most likely scenario is that it flows north easterly towards the River Liffey. Wells in the area have reportedly yielded 500 m³/day to 2,000 m³/day. (There are no well reported within 500m of the site boundary).

Hydrology

Surface water information for the area was obtained from a review of the previously mentioned EIAs and the EPA’s interactive water quality website.

The natural characteristics of the local surface water flow were altered significantly during redevelopment of the area. The site is located within a newly renovated industrial park, where surface and foul water is collected and directed towards segregated dedicated drainage systems.

Surface water from the roof and surrounding sealed areas is directed by a series of open gullies along the southern, western and northern sides of the subject site, to the Park West Industrial Park’s main storm water drainage system, located to the north of the site on the main road (within 3-4m of the site boundary). Currently, there are five points from the Site connecting with the industrial park’s combined drainage system.

The site is served by internal surface water drains system that is directed to the eastern portion of the site, where it is directed through a 225mm surface water drain where it joins up a culvert at the Gallanstown stream, approximately 200m east of the site.

There are no oil interceptors on the subject site and it is unclear if there are any provided in the wider industrial park.

Prior to the redevelopment, the majority of the surface water flow would have been in the general direction of the River Cammock, located approximately 800m south-east of the site, which flows east and then north where it joins the River Liffey at Heuston Station, 4km east of the site and flows into the Irish Sea.

The water quality monitoring station at Kylemore Rd is situated on the Cammock. The Hydrometric Area Description for this area is; the surface catchment drained by the River Liffey and by all streams entering tidal water between Sea Mount and Sorrento Point, in County Dublin.

The biological data shows that in 1998 the water quality was moderately polluted, with a Q-value of 3 and from 1989-1996 the water quality was seriously polluted, with a Q-value of 1.

K2.3 SITE HISTORY

The site was developed over the period from 2000 to 2002 by *Harcourt Developments*. Prior to this time, the site was reportedly an undeveloped green field.

As part of the planning application process for the area, a full environmental impact assessment was undertaken and submitted to the local authority (reference *EIA 2529/99 - Dublin City Council Planning Section*). As part of the original redevelopment, investigations were carried out to identify the potential for soil/groundwater contamination on site. No contamination was reportedly identified and no remediation was deemed necessary.

The subject site was originally occupied by *Roches Stores*, (from 2002-2005), and was used as a warehouse and distribution centre for their retail stock. No other activity has taken place within the unit since its construction and no external construction works have been undertaken at the site.

TechRec Ireland Ltd commenced operations on the Site (as a WEEE sorting and recovery facility) in November 2005. The Site is currently operating under a valid Waste Permit issued by the Dublin City Council (*Attachment B3-2*), for the processing of up to 5,000 tonnes of WEEE per year. Neither the permitted activity nor the building footprint has changed since commencement.

K3 OVERALL SITE RISK CATEGORY

An initial screening and operational risk assessment was undertaken for the Site as outlined in the EPA Guidance document (using the scoring system and tables presented in Section 2 of the Guidance document). The assessment considered the complexity of the proposed operation, the environmental sensitivity of the surrounding area and the pollution record/compliance history of the facility. A summary of the risk assessment is presented in *Table K3.1*.

The environmental sensitivity data used in the risk assessment is drawn from the Environmental Report (*Attachment I*) for the Site, which accompanies the Waste Licence Application.

Table K3.1 Overall Site Risk Category

	Details	Sub-Scores	Overall Score
Complexity		4	4 (High)
Licensed Activities	Recycling and reclamation of metals and metal compound.	G3 (3) Processing & recovery of 30,000 ton/yr	
	Temporary storage of WEEE prior to processing.	G4 (4) Temporary storage of 8,000 ton/yr	
Environmental Sensitivity		5	1 (Low)
Human Beings	Nearest residential premises is 160m to the SE.	3	
Groundwater Aquifer	Locally important aquifer (GSI) situated in Calp Limestone formation.	1	
	Low vulnerability. Bedrock is 10-20m below ground level and is overlain with boulder clay.	0	
Surface Water	The nearest water body is the River Cammock 800m to the SE. EPA monitoring in 1996 showed Q value of 1 (i.e. seriously polluted) and in 1998, a Q value of 3.	1	
	No designated sensitive areas (UWWT Regs)	0	
Air Quality & Topography	Simple, relatively level terrain.	0	
Protected Ecological Sites	No protected sites within 1km.	0	
Sensitive Agricultural Receptors	No agricultural receptors within 1km.	0	
Pollution Record	Compliant New Facility	1	1 (Low)
OVERALL RISK SCORE	4 x 1 x 1		4 (Low)

The risk assessment classifies the Site as posing a low environmental risk based on Table 2.2 of the EPA Guidance Document (i.e. total overall risk score <5).

This ELRA was subsequently developed based on the assessment of the Site being a low risk.

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K4 PRELIMINARY RISK IDENTIFICATION, ASSESSMENT & MITIGATION

K4.1 POTENTIAL OPERATIONAL (KNOWN) RISKS

A list of potential operational risks was developed based upon the nature of the activities and controls at the subject Site. As indicated previously, it is considered highly unlikely that there will be any unplanned/ unforeseen risks associated with the closure of the facility, as there are no underground tanks, pits, sumps, process pipelines etc, no process wastewater emissions, and no onsite treatment or disposal of waste products.

The operational risks were initially identified based upon the potential for the Site's activities to impact the key local environmental receptors, namely:

- air quality;
- noise quality; and
- soil/groundwater quality.

The preliminary assessment conducted as part of the Environment Report (*Attachment I*) indicated that there was limited potential for impact to surface waters or the foul sewer systems.

The risks were initially ranked based upon their likely probability of occurrence and the severity of impact if they did occur. The risks were ranked as per Tables 2 and 4 of Appendix C2 in the EPA Guidance Document. A summary is provided in *Table K4.1*.

Table K4.1 Initial Risk Register & Ranking

No.	Description	Frequency	Severity	Overall Risk Score
1	Failure of the primary air abatement system	2	3	6
2	Spill/leak from diesel tank, bund or hose	3	2	6
3	Spill/leak from mobile diesel tanker during refuelling	2	4	8
4	Failure of noise abatement systems	2	2	4
5	Processing of contaminated WEEE (e.g. PCBs, asbestos)	2	4	8
6	Improper offsite transfer/disposal of processed WEEE	1	5	5
7	Fire in onsite equipment	1	4	4
8	Employee struck by onsite vehicle/forklift	1	5	5

The risk matrix indicated that there were currently no 'high level' or red flag risks associated with the Site's activities (as defined in Table 4 of the EPA Guidance document). However, additional risk mitigation measures were developed to ensure that even these residual risks are minimised. These are outlined in *Table K4.2*.

The risks were then re-assessed and re-ranked following consideration of the effectiveness of the existing controls and the implementation of any additional recommended mitigation measures.

Table K4.2 Risk Mitigation Measures

No.	Description	Existing Controls	Proposed Additional Mitigation Measures	Revised Risk Score
3	Spill/leak from mobile diesel tanker during refuelling	Use of reputable contractor with compartmentalised delivery vehicles. Refuelling vehicle is driven inside building. All fuel deliveries are supervised.	Provision of spill kits & mats. Placement of external surface water drain covers prior to delivery. Spill control training.	6 (2x3)
5	Processing of contaminated WEEE (e.g. PCB, asbestos)	Initial inspection of incoming items by experienced operator. Ongoing inspection of WEEE at manual picking points.	Development of WEEE acceptance & identification criteria.	4 (1x4)
1	Failure of the primary air abatement system	Preventative maintenance system. Online monitoring of critical parameters (e.g. air flow & pressure drop). Provision of onsite spares.	Routine air quality monitoring as per Waste Licence.	4 (2x2)
2	Spill/leak from diesel tank, bund or hose	Use of a bunded tank which contain both the fill and dispensing points. Tank is located internally. All forklift refuelling is supervised.	Provision of spill kits & mats. Regular inspections of tank & bund. Spill control training.	3 (3x1)
6	Improper offsite transfer/disposal of processed WEEE	Clear labelling of processed WEEE. Use of appropriately licensed contractors. Proper recording of waste transfer documents.	Third-party audits of waste contractors and disposal facilities.	5 (1x5) No change
8	Employee struck by onsite vehicle/forklift	Use of high visibility vests for operators & reversing sirens on forklifts. Supervision of traffic in goods receiving area.	Provision of designated pedestrian walkways	5 (1x5) No change
7	Fire in onsite equipment	Provision of integrated water quench systems in the QZ & hammer mill. Provision of fire extinguishers.	Conduct of fire training and fire drills.	4 (1x4) No change
4	Failure of noise abatement systems	Preventative maintenance system for equipment. Visual inspections of noise abatement housing & anti-noise/vibration concrete pads.	Routine noise monitoring as per Waste Licence.	4 (2x2) No change

The responsibility and timing for the implementation of the identified additional risk mitigation measures is outlined in *Table K4.3*. The named responsible party has the appropriate level of authority and budgetary control to oversee the implementation of the recommended control measures.

The existing controls are already in place and are operating satisfactorily. The responsibility for the maintenance and upkeep of these controls lies with the Plant Manager.

Table K4.3 Implementation of Identified Risk Mitigation Measures

No.	Proposed Additional Mitigation Measures	Responsible Party	Timeframe
3	Provision of spill kits & mats. Placement of external surface water drain covers prior to delivery. Spill control training.	Plant Manager Plant Manager Plant Manager	Immediate Ongoing Within 3 months of receipt of Waste Licence.
5	Development of WEEE acceptance & identification criteria.	Commercial Director	Within 3 months of receipt of Waste Licence.
1	Routine air quality monitoring as per Waste Licence.	Managing Director	Ongoing as per Waste Licence
2	Provision of spill kits & mats. Regular inspections of tank & bund. Spill control training.	Plant Manager Plant Manager Plant Manager	Immediate Ongoing weekly visual inspections & 3 yearly integrity testing. Within 3 months of receipt of Waste Licence.
6	Third-party audits of waste contractors and disposal facilities.	Commercial Director	Rolling annual programme.
8	Provision of designated pedestrian walkways	Plant Manager	Within 3 months of receipt of Waste Licence.
7	Conduct of fire training and fire drills.	Plant Manager	Within 6 months of receipt of Waste Licence.
4	Routine noise monitoring as per Waste Licence.	Managing Director	Ongoing as per Waste Licence

It is anticipated that the Risk Assessment and associated controls will be reviewed and revised annually as part of the conditions of the Site's Waste Licence.

K5 SITE CLOSURE PROGRAMME

K5.1 CLOSURE CRITERIA

In this closure scenario, it has been assumed that the on-site plant and equipment will be decommissioned, but that the site infrastructure (i.e. the building and associated services/utilities) will remain and will continue to be used for a similar industrial land use.

The criteria which will be used to assess the successful, clean closure of the Site are as follows:

- All residual WEEE has been safely processed and/or disposed to an appropriately licensed facility;
- All processed WEEE has been sold/transferred to appropriate recycling/treatment facilities;
- All other wastes have been safely disposed to an appropriately licensed facility;
- All onsite equipment, including the abatement systems, have been safely decontaminated and either dismantled and disposed as waste, or transferred to an alternative site for reuse), depending on the lifespan of the equipment);
- The necessary waste transfer, or other appropriate records, are held for all items transferred from the site; and
- There is no residual soil or groundwater contamination present at the site.

K5.2 PRELIMINARY CLOSURE PLAN & COST ESTIMATE

Table K5.1 outlines the key elements within the Site's proposed Closure Plan. The Plan and the associated cost estimates will be reviewed each year as part of the conditions of the Site's Waste Licence.

As part of the assessment, it is assumed that site management will have at least three months warning of the intention to close the facility. At this stage, the site will stop receiving WEEE and will process the remaining WEEE inventory and begin transferring all residual materials off the site.

It is further assumed that closure would not occur for a minimum of 15 years. The onsite plant and equipment would still be viable and operational at this stage and would be suitable for ongoing use in a similar processing facility.

Table K5.1 Preliminary Closure Plan and Cost Estimates

Item	Activity	Description	Estimated Costs (€)
1	Cleaning of plant and equipment	All plant will be cleaned with damp cloths to the extent possible, both internally and externally. The rags would be disposed as a hazardous waste. There will be no significant use of water (e.g. no use of hoses), no generation of process effluent, or use of cleaning solvents. The cleaning would be undertaken by site personnel as part of the 3 month decommissioning process. This cost has been included in Item 7. No additional costs (e.g. contractors) are expected to be incurred.	-
2	Removal of plant and equipment	All onsite plant and equipment is anticipated to have a residual value and will either be sold for ongoing use or will be sold as scrap metal. The cost of this activity is expected to be minimal, although it may involve some transport costs.	20,000
3	Cleaning of other site infrastructure	All internal and external surfaces (with the exception of the roof) will be cleaned using damp cloths to the extent possible. The cleaning would be undertaken by site personnel as part of the 3 month decommissioning process and this cost has been included in Item 7. The cost estimate provided for this item is for the hire of lifting equipment to access high points around the building.	5,000
4	Processing of residual, WEEE	The site will stop receiving WEEE on notice of the intention to close and will process the residual inventory. The primary cost is expected to be from the use of 3 months of electricity and other site utilities. Wages are considered separately in Item 7.	45,000
5	Removal of processed WEEE	The processed materials will be sold/transferred as raw materials for reuse. This activity is expected to incur no, or minimal, transport or disposal costs for the Site.	-
6	Removal of all other waste materials	Based on the current estimates of the site's waste arisings (Attachment B14), it is estimated that 2,500 tonnes of hazardous wastes and 150 tonnes of non-hazardous wastes will be present at the time of closure and would subsequently be processed over the next 3 months. Of this approx 10% (265 tonnes) would require disposal, with the remainder being sold as processed materials. The Operator has assumed a cost of €300/tonne for disposal.	79,500
7	Conduct & supervision of onsite works	It is assumed that the closure works would be conducted over a 3 month period. The cost estimate is based on the payroll costs for key site staff during this period.	245,000
8	Testing and verification program	The programme will be supervised at all times and photographs of the key stages will be taken for inclusion in the Verification Report. Appropriate waste transfer documentation will be compiled as part of the decommissioning process and a summary will be included in the Verification report. In addition, it is proposed that the internal and external areas will be subject to 'swipe tests' for the identification of surface metal contamination (residual dusts). The swipe samples will be tested for lead, mercury, cadmium and chromium.	50,000
9	Reporting to EPA	A Verification Report will be prepared by a suitably qualified consultant and submitted to the EPA for approval.	10,000
10	Other overheads	Payment of equipment leases, building rental, rates and other management overheads.	343,000
	Subtotal		797,500
11	Contingency	A 25% contingency fee has been allowed for the decommissioning process.	199,375
	TOTAL		996,875

Given the history of the Site and the nature of the Licensed activity, no intrusive Phase II Soil or Groundwater Investigations are considered necessary at this stage. This assumption will be reviewed in future ELRAs, based on the future operation, environmental performance and any potential incidents which may occur at the Site.

It is further noted that a Site Restoration and Aftercare Management Plan is not required for low risk facilities.

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K6 FINANCIAL PROVISIONS

K6.1 COMPANY OVERVIEW

TechRec Ireland Ltd is an incorporated company with the majority ownership (51%) held by *One51 Ltd.* (formerly *IAWS*). The remaining 49% is shared between the following:

- *AL Goodbody Consulting* 10%
- *Brendan Palmer* 20%
- *Gerry Killen* 10%
- *Immark AG* 9%

One51 Ltd (formerly *IAWS*) is fully committed to the successful development and K6.1 provides a summary of *One51's* annual turnover, profit and net assets for the previous three years, as taken from *IAWS's* Annual Report.

Table K6.1 One51 Turnover, Profits & Assets

	2005 (€)	2004 (€)	2003 (€)
Provided separately as commercially sensitive data			

In addition the parent company *One51 Ltd* has provided a financial statement on behalf of *TechRec Ireland Ltd.* This is also submitted separately as commercially sensitive data,

K6.2 INSURANCE COVER

The company's insurance cover falls under a Combined Liability Insurance Policy for *One51 Ltd* and its subsidiary companies; specifically including *TechRec Ireland Ltd & TechRec (NI) Ltd.*

The Policies are held with *FDB Insurance Brokers*, (Policy No. 00699200/04/01 and 00699200/04/03) and are current for a period of 12 Months from June 21st 2006.

The Policies specifically addresses *TechRec's* activities as a waste contractor and cover is provided under the following Policies:

- Employers Liability;
- Public/Products Liability; and
- Excess Public/Products Liability.

Information regarding the contents and limits of liability and copies of the relevant Insurance Certificates are provided separately as commercially sensitive information.

K6.3 IMPLICATIONS

It is noted that the Operator's current insurance cover does not specifically address the topic of environmental liabilities and it is likely that most of the environmental risks identified in *Table 4.1* (Items 1-6) would not be covered by the Policy. These risks represent the potential failure of aspects of the Site's operational system and as such, would be managed and mitigated as part of *TechRec's* operational budget.

The liabilities associated with a potential employee injury, or a fire at the facility (Items 7 & 8 in *Table K4.1*), are included under the Operator's existing insurance Policies. The level of coverage provided under these Policies is considered adequate for these risks.

In addition, the Site holds insurance to cover potential 'business interruptions' under their Policy which would cover the payment of business expenses such as the lease, wages, interest on loans etc, in the event of an unplanned Site closure. The level of coverage provided under this Policy is considered adequate to cover such closure costs.

The Site also holds cover for the removal of 'stock and debris', as part of their Main Policy (under 'Property') which would provide for the removal of waste streams and any unprocessed WEEE from the Site, in the event of an unplanned closure. The level of coverage provided under this Policy is considered adequate to cover such closure costs.

One51 Ltd has a significant annual turnover and substantial net assets and is fully committed to the successful development and management of the *TechRec* business in Ireland. It is considered that the parent company has sufficient assets and cash flow to ensure that any environmental liabilities associated with either the Site's operation or closure, are addressed in a swift and efficient manner. The parent company has also provided written financial statement in support of *TechRec's* Waste Licence. This is provided separately as commercially sensitive information.