

# **Waste Licensing**

**Waste Transfer and Recycling Facility  
Dock Road  
Limerick**

**Annual Environmental Report  
2008**

**Veolia Environmental Services (Ireland) Ltd.**

**EPA Ref. No:**

**W0082-02**

**Environmental Protection Agency**  
Regional Inspectorate Office  
Iniscarra, Co. Cork.

Telephone: 021- 4875540

Fax: 021- 4875545

**VEOLIA ENVIRONMENTAL SERVICES (IRELAND) LTD.**

**WASTE TRANSFER AND RECYCLING FACILITY**

**ANNUAL ENVIRONMENTAL REPORT**

**2008**

**Prepared by:**

Garrett Walsh  
Environmental Officer  
Veolia Environmental Services (Ireland) Ltd.

---

## TABLE OF CONTENTS

---

	<b>PAGE</b>
1 INTRODUCTION.....	1
1.1. Veolia Environmental Services (Ireland) Ltd. Environmental Policy.....	2
2 DESCRIPTION OF THE SITE.....	3
3 MONITORING AND EMISSIONS SUMMARY.....	4
3.1. Emissions to Surface Water.....	4
3.2. Foul Sewer Monitoring Results.....	6
3.3. Dust Deposition.....	6
3.4. Noise.....	7
3.5. Groundwater Monitoring.....	8
3.6. Interpretation of Monitoring Results.....	9
3.6.1. Surface Water Discharge.....	9
3.6.2. Foul Sewer Discharge.....	9
3.6.3. Dust Deposition.....	9
3.6.4. Noise.....	9
3.6.5. Groundwater Monitoring.....	10
4 SITE DEVELOPMENT WORKS.....	11
5. WASTE RECEIVED BY AND CONSIGNED FROM THE FACILITY.....	12
5.1 Waste Handled by VES Ireland Ltd. in the Limerick Region.....	12
5.1.1 Waste Composition.....	12
5.1.2 Quantities of Waste Disposed or Recycled.....	12
6.0 ENVIRONMENTAL INCIDENTS, COMPLAINTS & NUISANCE CONTROL.....	14
6.1 Incidents Summary.....	14
6.2 Complaints Summary.....	14
7.0 OBJECTIVES & TARGETS and ENVIRONMENTAL MANAGEMENT PLAN.....	15
7.1 Introduction.....	15
7.1.1 Schedule of Environmental Objectives and Targets.....	15
7.1.2 Achievement of Environment Objectives and Targets.....	15
7.2 Report on 2008 O&T and 2009 Plan.....	16
7.3 Environmental Management System.....	18
7.3.1 Environmental Manual.....	18
7.3.4 Standard Operating Procedures.....	19
7.4 Management and Staffing Structure.....	20
7.5 Financial Provisions.....	21
8.0 RESOURCE CONSUMPTION SUMMARY.....	22
9.0 WASTE LICENCE AUDIT AND REVIEW.....	23
10.0 REPORT ON PUBLIC INFORMATION PROGRAMME.....	24

**Appendix I – Site Plan showing monitoring points**

**Appendix II – PRTR Report 2008**

---

## 1 INTRODUCTION

---

Veolia Environmental Services Ireland Ltd. holds a Waste Licence (Reg. No. W0082-2) issued by the Agency in November 2003 for its waste transfer and recycling station at Ballykeefe, Dock Road, Limerick. In January 2001, Veolia Environmental Services (Ireland) Ltd. formerly known as IPODEC assumed operation of the site. A licence transfer application was submitted to the Agency in February 2001. This was approved by the EPA in April 2002. A waste review application was submitted to the Agency in October 2002 and this was granted by the Agency on the 06/11/2003. In accordance with the requirements of Schedule E of the Waste Licence, an Annual Environmental Report (AER) for the facility must be submitted to the Environmental Protection Agency (EPA).

This is the eighth AER, covering the reporting period from 1<sup>st</sup> January to 31<sup>st</sup> December 2008.

The facility is located at: -

Ballykeefe,  
Dock Road  
Limerick.

Tel. (061) 304545

Fax: (061) 225964

National Grid co-ordinates for the location of the facility are: E 15545 N 15560.

## **1.1. Veolia Environmental Services (Ireland) Ltd. Environmental Policy**

Veolia Environmental Services (Ireland) Ltd. is fully committed to the operation of its facilities to the highest environmental standards and fully supports and adheres to that policy.

It is the policy of Veolia Environmental Services (Ireland) Ltd. to protect the local environment and to minimise the impact of the operation on the environment. To achieve this objective it is committed to:

- Adhering to all relevant environmental legislation and relevant statutory obligations that relate to its activities both on and off site.
- Ensuring that all operations carried out by the company are done in a manner which ensures that environmental protection is taken into account.
- Providing and maintaining site facilities that are designed, constructed, operated and maintained to encompass the principles of good environmental practice.
- Striving to achieve a continuous improvement in efficiency of operations and environmental performance.
- Striving to minimise the quantity of waste disposed of at landfill and increasing the amount of material recycled / recovered.
- Providing environmental information to the community and responding positively to queries or complaints.
- Providing adequate training to all employees on environmental awareness and resource management.

*Original signed by Morgan Toner 21/08/06*

## 2 DESCRIPTION OF THE SITE

---

The site is situated at Ballykeefe, Dock Road, Limerick, in an area dominated by industrial and commercial buildings. The site is located adjacent to the N69, on the main Limerick to Foynes road and is readily accessible via the local road network.

Waste handling activities at the facility consist of accepting and bulk loading of commercial, industrial and municipal waste for transfer to a number of landfills. Waste Materials are also recycled at the facility - cardboard, paper, timber, metal, plastic, glass and C&D Waste are recovered from the waste streams for recycling. The main activity on-site is considered to be the bulk loading and transfer of waste to the main disposal routes, Gortnadroma & Inagh Landfills.

The licensed waste handling activities, permitted under the Third and Fourth Schedule of the Waste Management Act (1996), in the Waste Licence (82-2) are as detailed below;

*Third Schedule, Class 12.* Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.

*Third Schedule, Class 13.* Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.

*Fourth Schedule, Class 2.* Recycling or reclamation of organic substances (including composting and other biological transformation processes) which are not used as solvents.

*Fourth Schedule, Class 3.* Recycling or reclamation of metals and metal compounds.

*Fourth Schedule, Class 4.* Recycling or reclamation of other inorganic materials.

*Fourth Schedule, 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.

---

### 3 MONITORING AND EMISSIONS SUMMARY

---

Environmental monitoring results for the reporting period are outlined in the following sections. An interpretation of the results and impacts on the environment are also presented. A site plan showing the position of each monitoring location is included in the Appendix.

#### 3.1. Emissions to Surface Water

Site emissions to surface water are addressed in Schedule D.4 of the Waste Licence 82-2. The Licence requires that emissions to surface water be measured bi-annually. Samples are taken from 2 locations, WS9 and WS10, which are surface water samples from the stream that runs alongside the facility. The number of locations has been reviewed and in agreement with the Agency with only locations WS9 & 10 being retained. (No ELVs or trigger levels are set for these two points). Discharge from the interceptors, which enters the stream, is done at FE1A & FE1B. The samples are analysed for levels of pH, Total Suspended Solids (TSS), biochemical oxygen demand (BOD), mineral oils and oils, fats, greases (OFG). All sampling is carried out by trained personnel and analysis is carried out by BHP Laboratory.

A summary of the results is given in Table 3.1 a and b below.

**Table 3.1a Surface Water Monitoring 2008**

Parameter	Monitoring location			
	WS9	WS10	WS9	WS10
	10/01/08	10/01/08	17/10/08	17/10/08
<b>pH</b>	7.35	7.24	6.8	6.95
<b>BOD mg/l</b>	5	8.5	2	4
<b>Suspended Solids (mg/l)</b>	14.0	20.0	6	9
<b>Mineral Oil mg/l</b>	<0.01	0.305	<0.1	<0.1
<b>OFG mg/l</b>	8.5	<1	2	<1

**Table 3.1b Surface Water Discharge Results 2008**

<b>Parameter</b>	<b>ELV's</b>	<b>FE1A</b>	<b>FE1A</b>	<b>FE1B</b>	<b>FE1A</b>	<b>FE1B</b>
		10/01/08	12/08/08	12/08/08	17/10/08	17/10/08
<b>pH</b>	<b>N/A</b>	7.34	6.26	6.2	6.87	6.68
<b>BOD mg/l</b>	<b>N/A</b>	25.5	8	11	3	2
<b>Suspended Solids (mg/l)</b>	<b>60</b>	18	14	<1	44	30
<b>OFG mg/l</b>	<b>N/A</b>	11.5	<1	<1	1	2
<b>Mineral Oil mg/l</b>	<b>5</b>	<0.01	<0.01	<0.01	N/T	N/T
<b>Ammonia mg/l</b>	<b>N/A</b>	-	-	-	0.36	0.3
<b>Total Phosphorous mg/l</b>	<b>N/A</b>	-	-	-	0.04	0.1
<b>Total nitrogen mg/l</b>	<b>N/A</b>	-	-	-	7	1
<b>Sulphates mg/l</b>	<b>N/A</b>	-	-	-	4.2	4.2

Emission limit values were issued for mineral oils and suspended solids for surface water discharges, of 5mg/l and 60mg/l respectively.



### 3.2. Foul Sewer Monitoring Results

Schedule D.5 of Waste Licence requires that emissions to foul sewer be monitored bi-annually. Currently all foul water arising from the site offices is treated by the on-site wastewater treatment plant. Samples are collected at monitoring location FE2. The results of the monitoring are detailed in Table 3.2 below.

**Table 3.2 Foul Sewer Monitoring Results**

<b>LOCATION FE2</b>	<b>BOD Mg/l</b>	<b>pH</b>	<b>TSS Mg/l</b>	<b>OFGS Mg/l</b>	<b>Total Nitrogen</b>	<b>Total P Mg/l</b>	<b>Ammonia Mg/l</b>	<b>Sulphate Mg/l</b>	<b>T oC</b>
<b>ELV</b>	<b>10000</b>	<b>6-9</b>	<b>2000</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>50</b>	<b>500</b>	<b>42</b>
<b>10/01/08</b>	10	7.0	25	16	52	0.42	0.17	76.4	Not taken
<b>14/11/08</b>	8	6.42	69	<1	82	2.46	4.7	84.4	6.5

### 3.3. Dust Deposition

Dust monitoring was carried out during June, July-August and December 2008-January 2009 in accordance with the Standard Bergehoff Method and in compliance with schedule D.2 of Waste Licence 82-2, to determine the impact of site operations on the surrounding environment. Results of this monitoring are presented in Table 3.3. below.

**Table 3.3 Dust Monitoring Results 2008**

<b>Month</b>	<b>DM1</b>	<b>DM2</b>	<b>DM3</b>	<b>ELV's mg/m<sup>2</sup>/day</b>
<b>June</b>	228.3	237.8	196.5	<b>350</b>
<b>July-August</b>	329.4	30	226.1	<b>350</b>
<b>December - January</b>	157.2	70	216.7	<b>350</b>

### 3.4. Noise

Condition 9.3 of the waste licence requires that noise monitoring be carried out at the facility annually. Monitoring was carried out at the facility, nighttime and daytime, at each of the monitoring locations, NI1 to NI4 during December 2008, the results of which are detailed in Table 3.4 below.

**Table 3.4 Noise Monitoring Results**

Reference No.	Description	Measurement Start Times and Period	dB(A)		
			L <sub>Aeq</sub> ELV 55 Dav. 45 Night	L <sub>A10</sub>	L <sub>A90</sub>
<b>DAYTIME</b>					
NI1	North-Western Site Boundary At water treatment plant	18.29 15 mins	54	55	52
NI2	Northern Site Boundary Glass Bay	18.56 15 mins	49	66	46
NI3	South western site boundary Corner of MRF, near phone mast	17.43 15 mins	55	57	52
NI4	South-Eastern Site Boundary Entrance Gate	19.22 15 mins	69	71	61
<b>NIGHT-TIME</b>					
NI1	North-Western Site Boundary	23.01 15 mins	49	51	45
NI2	Northern Site Boundary	23.22 15 mins	48	50	44
NI3	South western site boundary	22.31 15 mins	53	54	50
NI4	South-Eastern Site Boundary	23.52 15 mins	64	69	50

### 3.5 Groundwater Monitoring

Veolia Environmental Services is also required under the conditions of waste licence 82-2 to monitor groundwater boreholes at the site, on a bi-annual basis. There are currently 3 groundwater monitoring points at the facility – GWM1, GWM2 and GWM3. Groundwater monitoring was carried out during May and September 2008 (October for GWM2, where access had been obstructed). The results are detailed in Table 3.5.1 and 3.5.2 below.

**Table 3.5.1 May 2008 Groundwater Monitoring Results**

Parameter	GWM1	GWM2	GWM3
BOD mg/l	53	-	64
Suspended Solids mg/l	175	-	3652
Dissolved Oxygen mg/l	53.5	-	73.3
OFG mg/l	2	-	8.7
Ammonia mg/l N	7.5	-	0.94
Conductivity (µS/cm)	903	-	834
Total Phosphorous mg/l	0.77	-	<0.01
Diesel Range Organics mg/l	<0.01	-	<0.01
Aliphatic HC mg/l	<0.01	-	<0.01
Undecane mg/l	<0.01	-	<0.01

**Table 3.5.2 September/October 2008 Groundwater Monitoring Results**

Parameter	GWM1	GWM2	GWM3
BOD mg/l	77	8	8
Suspended Solids mg/l	171	366	847
Dissolved Oxygen mg/l	62.6	50.1	91.7
OFG mg/l	8	4.7	7.5
Ammonia mg/l N	3.6	6.4	0.49
Conductivity (µS/cm)	919	1484	810
Total Phosphorous mg/l	0.26	1.0	<0.01
Diesel Range Organics mg/l	<0.01	<0.01	<0.01
Aliphatic HC mg/l	<0.01	<0.01	<0.01
Undecane mg/l	<0.01	<0.01	<0.01

No ELVs are set for groundwater analysis in W0082-02.

## **3.6 Interpretation of Monitoring Results**

### ***3.6.1. Surface Water Discharge***

The surface water discharge is to be sampled on a bi-annual basis. There was no sample taken for FE1B early in the year as there was no flow from that interceptor during the scheduled sampling. Through misunderstanding, the contract laboratory tested the October samples for the Foul Water (FE2) suite of tests, thus missing a mineral oil test. Results were comparable with 2007's and compliant for all points.. Drain cleaning followed and subsequent results were satisfactory. No elevated levels were recorded from the surface water stream samples, upstream or downstream of the facility.

### ***3.6.2. Foul Sewer Discharge***

No elevated levels were recorded at the outlet to the waste water treatment plant during 2008. Overall the operation of the treatment plant appears to be effective and working well. Results were improved on average versus 2007. Full cleanout of the WWTP system took place in February 2009.

### ***3.6.3. Dust Deposition***

There were no non-compliances recorded for dust deposition during monitoring events in 2008. Results were significantly improved on 2007 averages and showed the effect of more regular use of the road sweeper, the pruning back of branches overhanging DM1 and a very wet summer.

### ***3.6.4. Noise***

The results of the noise survey carried out show that the site is located in a high noise environment. Traffic noise during both day and night-time monitoring was a significant source of noise at all of the monitoring locations with the exception of one, NI2.

The environmental noise assessment carried out at the site examined the background noise in the region and the noise generated by the waste management operations on the site. The following conclusions have been reached:

- The site is located in a high noise area, where traffic noise from the Dock Rd dominates.

- Three of the four monitoring locations, NI1, NI3 and NI4, are particularly influenced by this traffic noise.

In general, the noise emissions from the site are consistent with the general noise regime in the area. During the daytime monitoring period, there were a diffuse range of noise sources from the commercial/industrial area around the site particularly from the high volumes of traffic in the area. There was another co-dominant sound emanating from the direction of the Limerick Sewage Works/Tunnel works. The main noise source on-site was from fork-lift and truck movements in the yard. NI1-2&3 points were compliant with the daytime limit of 55dB(A). The dominant noise source in the locality during both day and night monitoring periods, however, was from traffic on the adjacent Dock road (point NI4).

### ***3.6.5 Groundwater Monitoring***

The contract laboratory, which sampled and analysed the groundwater points, found that all three boreholes had hydrocarbons below the limit of detection of 0.01mg/l. GWM2 and GWM3 points especially were significantly improved on 2007.

---

#### **4 SITE DEVELOPMENT WORKS**

---

Further works undertaken to increase waste processing capacity and the provision of standby capacity at the site during the reporting period are summarised hereunder;

- A grab machine is available at all times on-site in case of a breakdown in the loading shovel.
- Veolia Environmental Services has acquired a fourth forklift at the site to assist in loading of recyclables and feeding the MRF and baling machine. It is highly unlikely that all forklifts would breakdown at the same time and there is more than adequate standby capacity to continue with recycling operations as normal.

#### **Development Works 2008**

The plastics polydensifier was removed in March 2008. No other major development works were scheduled at the Veolia Environmental Services facility in 2008.

#### **Development Works Planned for 2009**

Veolia Environmental Services have not yet formalised plans to develop processing capacity in 2009.

## 5. WASTE RECEIVED BY AND CONSIGNED FROM THE FACILITY

---

### 5.1 Waste Handled by VES Ireland Ltd. in the Limerick Region.

#### 5.1.1 Waste Composition

Waste accepted at the Waste Transfer and Recycling Facility is commercial and industrial, household and construction and demolition. All waste is non-hazardous. The waste received at the facility during the reporting period amounted to 58,204 tonnes, or 32,000 tonnes below the limit of 90,000 tonnes per annum set in Waste Licence 82-2. The relative quantities and types of waste accepted into the facility during the reporting period are summarised in Table 5.1.

**Table 5.1 Waste Sources to Veolia Environmental Services 2008 v 2007**

MATERIAL	MSW	CB & Paper	PLASTIC	WOOD	METAL	C&D	WEEE	GLASS	SLUDGE	MIXED PACKAGING
<b>QTY 2007 (Tonnes)</b>	29514	16463	3005	2646	160	1879	0	387	0	6300
<b>QTY 2008 (Tonnes)</b>	26686	14260	984	1900	247	1100	1	472	4671	7882

#### 5.1.2 Quantities of Waste Disposed or Recycled

Waste collected and brought to the Waste Transfer and Recycling facility has a number of disposal routes listed hereunder. All facilities are fully licensed by the EPA. Recyclables, such as cardboard, plastic, timber, metal and C&D are removed from the waste stream and sent to licensed or permitted facilities for recycling. The relative quantities of waste removed from the facility for disposal / recycling during the reporting period are summarised in Table 5.2 & 5.3. More detail may be found in the appended PRTR.

**Table 5.2 Waste Quantities Removed from Veolia Environmental Services 2008 v 2007**

<b>Destination of Waste</b>	<b>Tonnes 2007</b>	<b>%</b>	<b>Tonnes 2008</b>	<b>%</b>
<b>MWM Landfill Disposal</b>	29,475	51	26,672	45.7
<b>Sludge Landfill Disposal</b>	0	0	4,203	7
<b>Sludge Recycling (Compost)</b>	0	0	156	0.3
<b>Other Recycling</b>	27,918	49	27,623	47

**Table 5.3 Breakdown of Recycling/Recovery at Dock Rd. facility 2008 v 2007**

<b>Waste type</b>	<b>Cardboard &amp; Paper</b>	<b>Plastic</b>	<b>Timber</b>	<b>Glass</b>	<b>C&amp;D</b>	<b>Textiles</b>	<b>Metal</b>	<b>WEEE</b>	<b>Mixed Packaging</b>
<b>EWC Codes</b>	15 01 01/ 20 01 01	15 01 02/ 20 01 39	20 01 38/ 15 01 03	15 01 07	17 01 01	20 01 11	20 01 40	20 01 36	15 01 06
<b>Quantity 2007 (Tonnes)</b>	17945	2389	3481	424	2170	0	1106	0	0
<b>Quantity 2008 (Tonnes)</b>	18891	1855	2653	478	1469	112	654	8	1502

### **5.1.3 Unacceptable Waste**

Throughout the twelve-month period any waste that was deemed to be unacceptable and/ or hazardous according to the Waste Register was removed to the Waste Quarantine Area prior to removal off-site for proper disposal where possible.

A number of empty gas bottles were removed from waste loads throughout the reporting period. These bottles were safely stored on-site and sent for recovery to Calor Gas during 2008 and a cage provided by the latter for future units.

Two drums of flammable liquids were quarantined on site during the year and disposed of to Safetykleen for recycling as fuel during 2008.



---

## **6.0 ENVIRONMENTAL INCIDENTS, COMPLAINTS & NUISANCE CONTROL**

---

### **6.1 Incidents Summary**

Condition 8.1 of Waste Licence W0082-02 requires that the licensee shall make written records of the environmental incidents. There were no incidents recorded for the reporting period.

### **6.2 Complaints Summary**

As in 2007, there were no complaints received during 2008.

### **6.3 Nuisance Control at the Facility.**

In compliance with condition 6.1 and 6.3 of the waste licence, weekly nuisance and litter inspections are carried out at the facility by the Environmental Officer. The site is inspected for evidence of vermin, odour, litter, mud, dust and insects. Each inspection is recorded, including any corrective action that may be taken as a result of the inspections.

Veolia Environmental Services has an on-going contract with Rentokil Initial Ltd. for the control of vermin at the facility. This includes the provision and maintenance of forty bait boxes for the control of rats and mice at the facility and 8 treatments annually for the treatment of insects at the facility, including the site offices, transfer and recycling building and any other area, which may be affected. Pest activity on site during 2008 was classified as light.

Litter picks are carried out on a daily basis, in compliance with condition 6.3. If dust is found to be a nuisance at the facility, the concrete surfaces of the yard are sprinkled periodically with water to suppress dust levels. Mud is removed from the facility by sweeping the yard with the contracted road-sweeper.

---

## **7.0 OBJECTIVES & TARGETS and ENVIRONMENTAL MANAGEMENT PLAN**

---

### **7.1 Introduction**

As previously structured, the “EMP” (actually an EMS update report) to be submitted separately to the Agency (under Conditions 2.2 to 2.4) includes the schedule of objectives and targets, site operational procedures and the management and staffing structure reflecting current appointments at the facility. The EMP (EMS) also summarises the procedure by which members of the public can obtain information, at all reasonable times, concerning the environmental performance of the facility. As per the agreed 2008 O&T, the company is on target to implement an ISO 14001 Environmental Management System, which significantly alters the previous documentation system (see Section 7.3).

The Schedule of Environmental Objectives and Targets and the Environmental Management Plan – *outlining the methods by which the O&T has been or is to be achieved* - for the reporting year and the forthcoming year are summarised in Section 7.2 below.

#### ***7.1.1 Schedule of Environmental Objectives and Targets***

A detailed Schedule of Environmental Objectives and Targets for the reporting period and the forthcoming year is presented in Section 7.2. The Schedule of Objectives and Targets is a multi-annual document (as per Condition 2.3.2.1), but it will be understood that as EMP methods or targets are achieved, they may be replaced with new methods or targets designed to achieve a *continuing* overall objective. The Site Environmental Review has identified new Objectives and Targets to add to the previous schedule.

#### ***7.1.2 Achievement of Environment Objectives and Targets***

In all cases Veolia Environmental Services Ireland Ltd. Objectives and Targets were set by the company and submitted to the Agency in May 2008. Some of the 2008 targets were achieved during the year, but others had to be postponed or restructured due to the economic climate. A summary of the achievement of targets and objectives to-date proposed is also presented in Section 7.2.

Veolia Environmental Services Ireland Ltd has made significant efforts to achieve all of the targets set by the individual objectives. Items referred to within these objectives are site specific and are the combined responsibility of the Regional Manager, Area Manager and Environmental Officer.

## 7.2 Report on EMP (Achievement of Environmental Objectives & Targets) 2008 and EMP Plans for 2009

What follows is the planned medium term O&T for the Limerick site, replacing previously annual O&Ts. This was approved in early 2008. The final columns identify progress made to date (March 2009) in achieving the O&T and, in italics, the continuing plans for 2009. The Site Environmental Review has identified a number of extra O&Ts that must be addressed in this plan. These (No 5 onwards) are added to the original four objectives and targets going forward.

Objective	Target	2008 Target Completion Date	Responsibility	Environmental Management Plan/ Programme	Status and 2009 Target Completion Dates
1-Redefine licence boundary	The Cussens Crane Hire facility is outside the control of Veolia Environmental Services (Ireland) Ltd.	July 2008	EHSO, NEM	Preparatory soil samples from the area in question were taken in April 2008 and the results internally assessed versus the Netherlands standard.	Complete
			Area Manager	Discussions took place between VES and the EPA regarding the issue in December 2008, the Agency detailing requirements to take this programme forward, including external hydrogeology tests and risk assessment and formal application for Licence amendment.	Complete
			<i>EHSO</i>	<i>Submission of the internal results is expected to be made in April 2009.</i>	<i>April 2009</i>
			<i>Regional Manager</i>	<i>Management to decide on whether to proceed with licence boundary amendment.</i>	<i>June 2009</i>
2-Continue to increase recycling rates at the facility.	Replace existing baler with larger capacity baler capable of baling other materials.  Expand material types for recycling	December 2008	Regional Manager	Programme was postponed, but Safetech belt system installed on original baler. New equipment was purchased (Runi heat compactor) in March 2008 diverting wastes from baler allowing more capacity to same.	Postponed indefinitely/Requirement obviated.
		Ongoing	Area Manager	New Runi equipment allows processing of PS/PP/EPE. In addition to this development, hard plastics from C&D (piping etc) are now being stored for recycling. Recycling rate (Output) increased from 49% in 2007 to 53% in 2008.	Completed.
				<i>Organic waste collection (for transfer) to commence in 2009.</i>	<i>June 2009</i>
	Construct Extension to Recycling shed.	December 2008	Regional Manager	Internal preparatory studies were performed for this development, but decision to proceed is unlikely in current economic climate.	

Objective	Target	2008 Target Completion Date	Responsibility	Environmental Management Plan/ Programme	Status and 2009 Target Completion Dates
3-Implement ISO14001, 9001 and 18001	Full implementation of working accredited EMS, QMS and SMS.	November 2009	Environmental Management Team	Significant progress was achieved during 2008 in updating Environmental and H&S procedures and documents to the required standard. (See Section 7.3 of AER for details). <i>Quality Management documents, including internal audits and training records are to be the main new efforts in 2009.</i>	Complete Jan 2009  <i>November 2009</i>
4-Training	Train Yard Foreman FAS Waste Operatives Course	2008	Regional Manager	Not commenced. To be decided in 2009.	TBD 2009
	Train Depot manager FAS Waste Management Course	2008		Area Manager has completed FAS Waste Management Course. Facility Manager was proposed trainee, but is undertaking H&S course at present. Current EHSO has completed the course.	Postponed – to review 2010
5-Improve Emergency Response / Emissions to Surface Water	Review ERP and other structures and procedures to confirm that these address (i) odour issues and (ii) oil spillage issues (in emergency) effectively.	new	NEM, NHSM, Environmental Management Team	<i>NEM, NHSM and local staff preparing study of same, which will lead to an updated ERP at the least.</i>	<i>May 2009</i>
6-Legislative Compliance	Comply with terms of Licence W0082-02	new	All	<i>This will be a permanent Objective &amp; Target going forward, performance to be measured in internal audits and Agency inspection reports.</i>	<i>Ongoing</i>

### **7.3 Environmental Management System**

Documented operating procedures for the facility, which are to be described in detail in the Draft Environmental Management System (to be submitted to the Agency) are undergoing complete reorganisation as part of the existing objective and target to implement an ISO-based system and are sub-divided as follows: -

- Environmental Manual
- Site Environmental Review
- Objectives & Targets and Environmental Management Plan (See Sections 7.1 & 7.2 above)
- ISO Procedures and Flow Charts
- Standard Operating Procedures
- Emergency Response Procedures
- Communications Programme (See Section 10 below)

A brief summary of these is provided below.

#### ***7.3.1 Environmental Manual***

This document outlines the Environmental Management System in place at Veolia, which is designed to achieve the requirements of both our Licence and the ISO 14001 standard. It refers to the following documents and record forms. The company is also implementing an ISO 9001 Quality Management System and an OHSAS 18001 Health & Safety Management System. Where possible, the company uses common procedures and forms for all three management systems. There has been significant progress in reviewing and issuing the EMS documentation. The Manual includes an Environmental Policy, Management Tree and Schedule of Roles & Responsibilities. Issued in October 2008, recent personnel changes will require its review.

#### ***7.3.2 Site Environmental Review***

The SER, or Register of Aspects & Impacts, is a tool used to identify and quantify the environmental risk pertaining to operations under normal or emergency conditions. This risk assessment process helps identify Objectives and Targets going forward, should the quantification of risk identify the environmental aspect (or hazard) as having a high impact. The SER was issued in January 2009.

#### ***7.3.3 ISO Procedures and Flow Charts***

The procedures are based on national templates, which have been reviewed and amended for local applicability. Flow charts are used where diagrammatic procedures are felt to be more useful than text in describing the operations in question. These VPs and VFCs – to an ISO-favoured format - have replaced many of the older SOPs below. Where possible, common procedures are

used for all three management systems. The list of environmentally-relevant VPs and VFCs follow, and were issued in the second half of 2008.

VP001 Document & Data Control Procedure  
VP002 Control of Records  
VP003 Management Review Procedure  
VP005 Internal Audit Procedure  
VP006 Control of Unacceptable Waste  
VP007 Procedure for determination of significance of Environmental Aspect  
VP008 Objective & Target Setting  
VP010 Environmental Aspect Identification  
VP011 Internal & External Communication Procedure  
VP012 Documentation requirements for Waste Movements  
VP014 Legislation Register  
VP015 Corrective & Preventative Action Procedure  
VP017 Environmental Incident Investigation & Reporting  
VP018 Environmental Complaints  
VFC002 Work Allocation – Customer Orders  
VFC003 Docket Processing  
VFC005 Yard Operation & Recycling  
VFC006 Maintenance of Equipment  
VFC008 Human Resources

#### ***7.3.4 Standard Operating Procedures***

The remaining Standard Operating Procedures' purpose is to ensure that routine tasks are carried out in the same manner each time they are undertaken, even if different operators perform them. They are to a local format and are used where site operations are sufficiently different from other depots in the Veolia Group not to warrant the issue of a VP or VFC. As in the latter two formats, their implementation encourages quality as well as safe work practices. Regard is also had for the site specific Safety Statement when carrying out any operations at the facility.

The (remaining) routine operations described in local-issue SOPs are as follows:

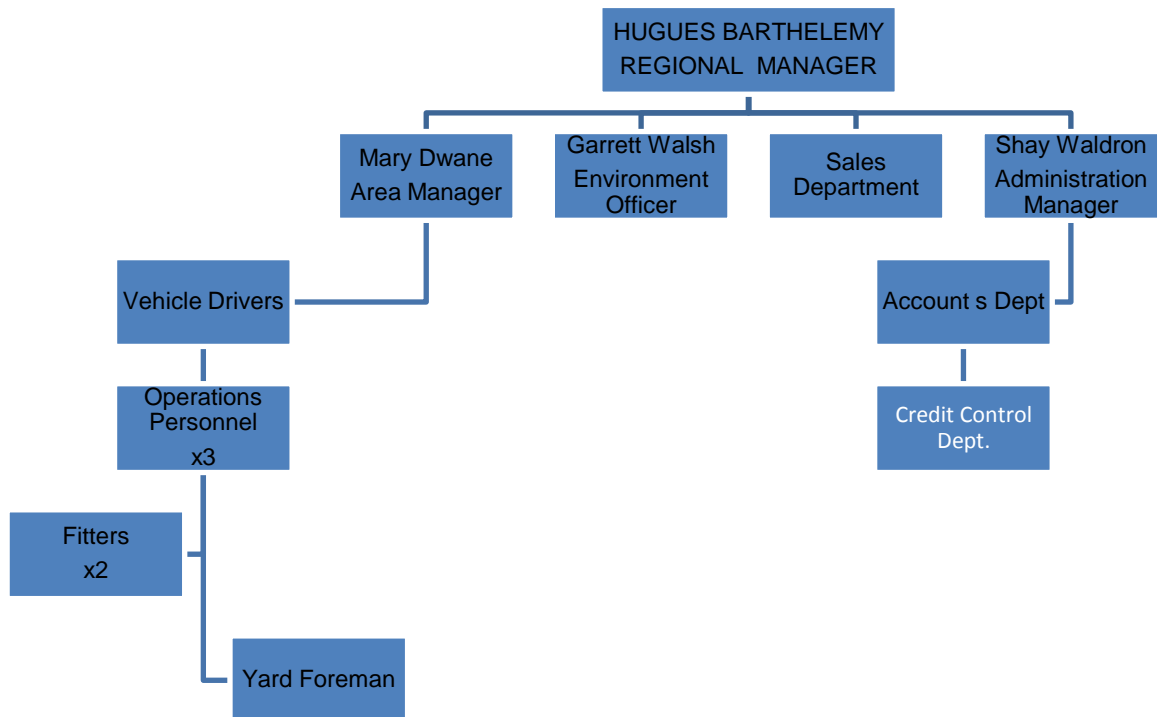
- Loading of Waste into transfer trailers
- Loading/Unloading of Trailers (recyclables)
- Baler/MRF operation.
- Shredder Operation
- Housekeeping
- Environmental Sampling & Monitoring
- Operation of equipment.

## 7.4 Management and Staffing Structure

The organisational structure for the facility is shown in Figure 7.1. Each of the positions identified in Figure 7.1 are discussed in detail in Section 10 of the Environmental Management Plan for the reporting year. Details of the relevant experience and qualifications for each person named, as well as arrangements for absence in the case of annual leave, illness and other absences, are maintained in the facility office.

A file consisting of training records for each employee is also maintained in the facility office.

**Figure 7.1 Current Management and Staffing Structure**



## **7.5 Financial Provisions**

The Environmental Liabilities Risk Assessment (ELRA) was updated in August 2006 (performed by Fehily Timoney & Co to the methodology of the EPA Guidance Document on ELRA/CRAMP/RMP/FP) and forwarded to the Agency for approval. The ELRA proposed a financial provision of €160,000 in the form of an existing general insurance policy that would guarantee that potential liabilities arising from:

- Emergency situations occurring during operation of the site
- Closure and decommissioning of the site

are financially provided for.

In September 2008 Veolia confirmed the above information with the Agency and updated the Agency on the current financial provision through insurance policy, which continues to provide coverage well in excess of the above recommended figure.



---

## 8.0 RESOURCE CONSUMPTION SUMMARY

---

Resources consumed at the facility include electricity, diesel fuel, steel wire, water and hydraulic oil. The major consumers of energy at the facility are as follows:

- Baling and ancillary equipment (Electricity, Hydraulic Oil, Diesel)
- Mobile Plant (Green Diesel, Hydraulic Oil)
- Road Fleet for waste transfer (White Diesel).

Energy and resource consumption at the facility can be summarised as follows:

Resource (units)	2007	2008	% Change
Diesel Fuel (litres)	338,100	293,314	-13
Green Diesel (litres)	116,160	84,380	-27
Hydraulic Oil (litres)	3,000	3,000	(est) No change
Electricity (kWh)	185,300	128,700	-31
Baling Wire (tonnes)	84	84	(est) No change
Water (m <sup>3</sup> )	3184*	2590	-19%

\*Correcting last year's submission.

### Analysis:

Resource usage was reduced last year due to a number of actions taken by the company and other factors. Diesel fuel usage was limited due to a reallocation of routes between company depots and more efficient route planning. On site vehicle fuel was reduced due to the elimination of a second loader on site and the reduction in timber inputs required less use of the shredder. Elimination of the polydensifier early in 2008 cut the electricity usage significantly.

## **9.0 WASTE LICENCE AUDIT AND REVIEW**

---

In addition to two EPA-performed water monitoring tests, there was one site inspection carried out by the Agency during the reporting period, 02/12/08. The inspection report had six observations which have been responded to.

---

## **10.0 REPORT ON PUBLIC INFORMATION PROGRAMME**

---

In compliance with condition 2.4 of the waste licence, a communications programme to ensure that members of the public can obtain information on the environmental performance of the company at all times was submitted to the Agency. During the reporting period there were no requests from members of the public to inspect any of the records and files listed in the submission. During customer audits however, environmental records, such as incident files, complaints files etc were inspected. Company brochures listing a range of services and company history are also available on request.

The list of documents available for inspection is as follows:

- Training Records
- Communication Records
- Environmental Monitoring Results
- Complaints Register
- Non-Compliance Records
- Corrective Action Records
- Unacceptable Waste Records
- Pest/Vermin Control Records
- Daily transactions for incoming and outgoing vehicles
- Current Waste Licence
- Waste Licences of Facilities
- Waste Collection Permits of Hauliers
- Veolia Environmental Services Safety Statement
- Communications Folder
- Storm Line Inspection Reports
- Emergency Response Procedures
- General Housekeeping Reports
- Facility Inspection Reports
- Environmental Procedures
- Tonnage Records
- Recycling Information
- Material Safety Data Sheets

Members of the public who wish to inspect these files may do so at any reasonable time during office hours by contacting the Environmental Officer or Area Manager.

**Garrett Walsh,  
Environment Officer  
Veolia Environmental Services (Ireland) Ltd  
Dock Road, Limerick.**

**Mary Dwane,  
Area Manager  
Veolia Environmental Services (Ireland) Ltd  
Dock Road, Limerick.**

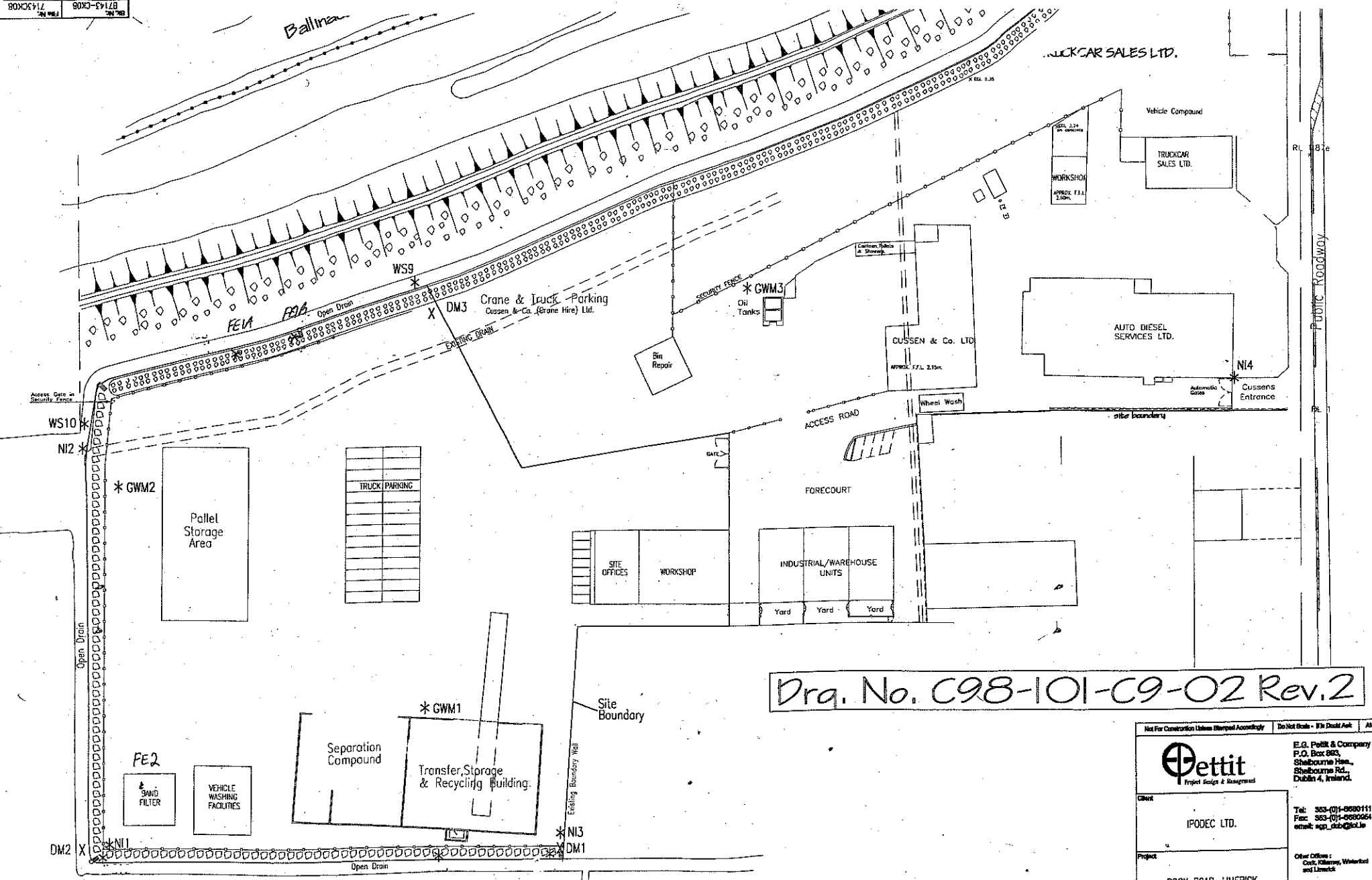
**APPENDIX I**  
**SITE PLAN WITH MONITORING POINTS**

**APPENDIX II**

**PRTR 2008**

Ballinacorney

TRUCKCAR SALES LTD.



Drq. No. C98-101-C9-02 Rev.2

Not For Construction Unless Stamped Accordingly		Do Not Scale - If In Doubt Ask		AS
 Project Name & Management		E.G. Pettit & Company P.O. Box 263, Sheehy's Farm, Sheehy's Rd., Dublin 4, Ireland.		
		Tel: 353-(0)1-6980111 Fax: 353-(0)1-6980264 email: egp_sdb@pett.ie		
Client		IPODEC LTD.		
Project		DOCK ROAD, LIMERICK		
Other Offices:		Conf. Kilmurry, Waterford and Limerick		
Overseas Offices:		USA, Poland and Nigeria		
Drp. Title WATER, DUST AND NOISE MONITORING LOCATIONS				



# AER Returns Worksheet

Version 1.1.03

REFERENCE YEAR	2008
----------------	------

## 1. FACILITY IDENTIFICATION

Parent Company Name	Veolia Ireland Ltd
Facility Name	Veolia Environmental Services
PRTR Identification Number	W0082
Licence Number	W0082-02

### Waste or IPPC Classes of Activity

No.	class_name
3.12	Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.
3.13	Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.
4.2	Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).
4.3	Recycling or reclamation of metals and metal compounds.
4.4	Recycling or reclamation of other inorganic materials.
4.13	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.

Address 1	Ballykeefe Townland
Address 2	Waste Management Section
Address 3	Dock Road
Address 4	Limerick
Country	Ireland
Coordinates of Location	311000.000
River Basin District	IE-Shannon
NACE Code	382
Main Economic Activity	Waste treatment and disposal
AER Returns Contact Name	Garrett Walsh
AER Returns Contact Email Address	garrett.walsh@veolia.ie
AER Returns Contact Position	Environmental Officer
AER Returns Contact Telephone Number	061-304545
AER Returns Contact Mobile Phone Number	086-1705034
AER Returns Contact Fax Number	061-225964
Production Volume	58600.0
Production Volume Units	tonnes
Number of Installations	1
Number of Operating Hours In Year	3890
Number of Employees	44
User Feedback/Comments	
Web Address	www.veolia.ie

## 2. PRTR CLASS ACTIVITIES

Activity Number	Activity Name
5c	Installations for the disposal of non-hazardous waste

## 3. SOLVENTS REGULATIONS (S.I. No. 543 of 2002)

Is it applicable?	No
Have you been granted an exemption?	No
If applicable which activity class applies (as per Schedule 2 of the regulations)?	
Is the reduction scheme compliance route being used?	



4.1 RELEASES TO AIR

| PRTR# : W0062 | Facility Name : Veolia Environmental Services | Filename : W0062\_2006.xls | Return Year : 2006 |

07/04/2009 12:05

SECTION A : SECTOR SPECIFIC PRTR POLLUTANTS

POLLUTANT		METHOD			QUANTITY			
No. Annex II	Name	M/C/E	Method Code	Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
						0.0	0.0	0.0

\* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

SECTION B : REMAINING PRTR POLLUTANTS

POLLUTANT		METHOD			QUANTITY			
No. Annex II	Name	M/C/E	Method Code	Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
						0.0	0.0	0.0

\* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

SECTION C : REMAINING POLLUTANT EMISSIONS (As required in your Licence)

POLLUTANT		METHOD			DM			QUANTITY		
Pollutant No.	Name	M/C/E	Method Code	Designation or Description	Emission Point 1	Emission Point 2	Emission Point 3	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
210	Dust	M	PER	average (Standard method VD2119 German Engineering Institute) x 1/3 site area x 365 days	469.7	221.9	420.0	1111.6	0.0	0.0

\* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

Additional Data Requested from Landfill operators

For the purposes of the National Inventory on Greenhouse Gases, landfill operators are requested to provide summary data on landfill gas (Methane) flared or utilised on their facilities to accompany the figures for total methane generated. Operators should only report their net methane (CH4) emission to the environment under T(total) KG/yr for Section A: Sector specific PRTR pollutants above. Please complete the table below:

Landfill: Please enter summary data on the quantities of methane flared and / or utilised	Veolia Environmental Services				Facility Total Capacity m3 per hour
	T (Total) kg/Year	M/C/E	Method Code	Designation or Description	
Total estimated methane generation (as per site model)	0.0				N/A
Methane flared	0.0				0.0 (Total Flaring Capacity)
Methane utilised in engine/s	0.0				0.0 (Total Utilising Capacity)
Net methane emission (as reported in Section A above)	0.0				N/A

5. ONSITE TREATMENT & OFFSITE TRANSFERS OF WASTE

| PRTR#: W0082 | Facility Name: Veolia Environmental Services | Filename: W0082\_2008.xls | Return Year: 2008 |

07/04/2009 12:05

21

Transfer Destination	European Waste Code	Hazardous	Quantity T/Year	Description of Waste	Waste Treatment Operation	Method Used		Location of Treatment	Name and Licence / Permit No. of Recoverer / Disposer / Broker	Address of Recoverer / Disposer / Broker	Name and Address of Final Destination i.e. Final Recovery / Disposal Site (HAZARDOUS WASTE ONLY)	Licence / Permit No. of Final Destination i.e. Final Recovery / Disposal Site (HAZARDOUS WASTE ONLY)
						M/C/E	Method Used					
To Other Countries	15 01 01	No	575.48	Cardboard & Paper Packaging	R3	M	Weighed	Abroad	UNITED KINGDOM	UNITED KINGDOM		
To Other Countries	15 01 01	No	597.34	Cardboard & Paper Packaging	R3	M	Weighed	Abroad	NETHERLANDS	NETHERLANDS		
To Other Countries	15 01 01	No	68.32	Cardboard & Paper Packaging	R3	M	Weighed	Abroad	INDONESIA	INDONESIA		
To Other Countries	15 01 01	No	1853.28	Cardboard & Paper Packaging	R3	M	Weighed	Abroad	INDIA	INDIA		
To Other Countries	15 01 01	No	15796.75	Cardboard & Paper Packaging	R3	M	Weighed	Abroad	CHINA	CHINA		
To Other Countries	15 01 02	No	131.65	Plastic Packaging	R3	M	Weighed	Abroad	UNITED KINGDOM	UNITED KINGDOM		
To Other Countries	15 01 02	No	40.89	Plastic Packaging	R3	M	Weighed	Abroad	FRANCE	FRANCE		
To Other Countries	15 01 02	No	1505.28	Plastic Packaging	R3	M	Weighed	Abroad	CHINA	CHINA		
Within the Country	15 01 02	No	71.36	Plastic Packaging	R3	M	Weighed	Offsite in Ireland	Reltech Processing, WP 07/04	Cooferhill, Co Cavan		
Within the Country	15 01 02	No	106.18	Plastic Packaging	R3	M	Weighed	Offsite in Ireland	Mid-West Plastics (Nuplastics) WP/TN/121 (Timber shred on site for later use as animal bedding)	Silvermines, Co Tipperary		
Within the Country	15 01 03	No	40.38	Wooden Packaging	R3	M	Weighed	Onsite in Ireland	Farmers E Gavini & J White Permit No/A	County Limerick		
Within the Country	15 01 03	No	119.1	Wooden Packaging	R3	M	Weighed	Offsite in Ireland	Molaisin Compost, WP66/08 (Co-firing trial) Lagan	Cappoquin, Co Waterford		
Within the Country	15 01 03	No	16.82	Wooden Packaging	R1	M	Weighed	Offsite in Ireland	Cement, P0487-05 (Landfill Cover) Limerick	Kinnegad, Co Westmeath		
Within the Country	15 01 03	No	118.62	Wooden Packaging	R10	M	Weighed	Offsite in Ireland	County Council W0017-01 (Biofilter use) Waterford City Council, W0234-01	Gortnadroma, Co Limerick		
Within the Country	15 01 03	No	53.72	Wooden Packaging	R3	M	Weighed	Offsite in Ireland	Eireblock, CK(S) 503/07	Road, Waterford City		
Within the Country	15 01 03	No	633.58	Wooden Packaging	R3	M	Weighed	Offsite in Ireland	Finsa, P0022-02	Macroom, Co Cork		
Within the Country	15 01 03	No	1670.46	Wooden Packaging	R3	M	Weighed	Offsite in Ireland	Killarney Waste, W0217-01	Scarrif, Co Clare		
Within the Country	15 01 06	No	1502.42	Mixed Packaging	R3	M	Weighed	Offsite in Ireland	Clare Glass, 015/05/WPT/CL	Tullagower, Kilnash, Co Clare		
Within the Country	15 01 07	No	478.4	Glass Packaging	R5	M	Weighed	Offsite in Ireland	Recycleworks (Sandyhills Environmental Services), WPT112	Sandyhill, St Margaret's, Co Dublin		
Within the Country	17 08 02	No	25.34	Plasterboard (w/Gypsum) from C&D Input	R5	M	Weighed	Offsite in Ireland	John A Woods, CK(S) 68/04	Ballygarvan, Co Cork		
Within the Country	17 01 07	No	1443.34	Mix of concrete, tiles etc, C&D waste	R5	M	Weighed	Offsite in Ireland	Hegarty Metals, WP01-2001	Ballysimon Rd, Limerick City		
Within the Country	20 01 40	No	598.08	Metals	R4	M	Weighed	Offsite in Ireland	KMK Metals, W0113-03	Tullamore, Co Offaly		
Within the Country	20 01 40	No	55.64	Metals	R4	M	Weighed	Offsite in Ireland	(Shred on site for use as horse training track material)			
Within the Country	20 01 11	No	112.36	Textiles (carpet offcuts)	R3	M	Weighed	Onsite in Ireland	Noel C Duggan, Permit No/A	Millstreet, Co Cork		
Within the Country	20 03 01	No	180.52	Mixed Waste Municipal	D1	M	Weighed	Offsite in Ireland	Bord na Mona, W0201-01	Drehid Landfill, Co Kildare		
Within the Country	20 03 01	No	3467.78	Mixed Waste Municipal	D1	M	Weighed	Offsite in Ireland	Cork County Council, W0068-02	Youghal Landfill, Co Cork		
Within the Country	20 03 01	No	5607.52	Mixed Waste Municipal	D1	M	Weighed	Offsite in Ireland	Cork City Council, W0012-02	Kinsale Road Landfill, Cork		
Within the Country	20 03 01	No	17416.52	Mixed Waste Municipal	D1	M	Weighed	Offsite in Ireland	Limerick County Council, W0017-01	Gortnadroma, Co Limerick		
Within the Country	19 08 12	No	155.6	WWTP Sludge	R3	M	Weighed	Offsite in Ireland	Waddock Composting, COMP-16	Tullow, Co Carlow		
Within the Country	19 08 12	No	4203.0	WWTP Sludge	R3	M	Weighed	Offsite in Ireland	Murphy Environmental, W0129-02	Naul, Co Dublin		
Within the Country	20 01 36	No	5.62	WEEE	R12	M	Weighed	Offsite in Ireland	Techrec, W0233-01	Park West, Dublin 22		
Within the Country	20 01 36	No	2.44	WEEE	R12	M	Weighed	Offsite in Ireland	KMK Metals, W0113-03	Tullamore, Co Offaly		

\* Select a row by double-clicking the Description of Waste then click the delete button