

Eco-Safe Systems Limited
Licence Register No. W0054-02

Annual Environmental Report 2008

CONTENTS

1. Reporting period and waste activities carried out
2. Waste Quantities
3. Monitoring of Emissions
4. Emissions to Sewer
5. Emissions to Air
6. Overall emissions compliance
7. Resources
8. Water usage and cost
9. Gas usage and cost
10. Electricity usage and cost
11. Development and infrastructural works
12. Development works completed in 2008
13. Development works scheduled for 2009
14. Incidents and complaints, external and supplier audits
15. Environmental Objectives and Targets
16. Environmental Management Programme
17. New Procedures
18. Noise Monitoring
19. Bund, Tank and Pipe Inspections
20. Financial Provisions, Management Structure and Public Information
21. Financial Provisions
22. Management Structure and Responsibilities
23. Public Information
24. Boiler Efficiency Testing
25. Use of Quarantine Store
26. Process Verification Report
27. Residuals Management Plan
28. Measures to prevent environmental damage

Appendices

- Appendix 1 EPA Audit report and STI Responses / ISO 14001 Certificate
- Appendix 2 Supplier Audit Reports
- Appendix 3 Noise monitoring report
- Appendix 4 Financial Provision / Company Insurance
- Appendix 5 Management Structure (Site Level)
- Appendix 6 Residuals Management Plan / Closure Plan

1. Introduction

This report covers the period from the 1 January 2008 to 31 December 2009.

Eco-Safe Systems Limited is involved in the collection and treatment of clinical waste under Waste licence number W0054-02 issued by the Environmental Protection Agency.

The following waste activities are carried out at the Eco-Safe Systems facility:

- Sterilisation of healthcare risk waste
- Shredding and grinding of sterilised healthcare risk waste
- Disposal of sterilised healthcare risk waste
- Recovery of sterilised healthcare risk waste
- Sale of healthcare risk waste packaging
- Segregation of non-conforming waste types
- Repackaging of non-conforming waste types
- Export of non-conforming waste types
- Operation of hazardous waste transfer station
- Export of hazardous waste for recovery/disposal

2. Waste Quantities

Amounts of waste received, processed and subsequently sent to landfill during the year 2008 were:

Quantity of Waste Treated 2008 = 785 tonnes

Quantity of Process Residues to Landfill 2008 = 761.42 tonnes

Quantity of Waste Exported (Off Site) 2008 = 1639.69 tonnes

3. Monitoring of Emissions

4. Emissions to Sewer

Effluent discharge results for January-June 2008 have been reviewed respectively. All required reports have been made to the EPA.

5. Emissions to Air

Bacterial and VOC samples were taken in 2008 were compliant.

6. Overall Emissions Compliance

Overall compliance was achieved during 2008.

7. Resources

Annual utilities usage and are shown below;

8. Water Usage 2008 = 5940 m³

9. Gas Usage 2008 = 622.87 MWh

10. Electricity Usage 2008 = 246 MWh

11. Development

12. Development Works Completed 2008

- Obtain 14001 Certification.
- Repairs to yard surfacing.
- Installation of new waste shredder.

13. Development Works Scheduled for 2009

- Repairs to yard surfacing.

14. Incidents and Complaints, External and Vendor Audits

Incidents

Incidents are defined in Waste Licence W0054-02 (Glossary) as:

1. an emergency
2. any emission which does not comply with the requirements of the licence
3. any exceedence of the duty capacity of the waste handling equipment
4. any trigger level specified in the licence which is attained or exceeded
5. any indication that environmental pollution has, or may have, taken place

On these criteria, the only incidents notified to the Regulator were;

- Minor odour complaints x2.

External audits

The only external audit completed was by the EPA during May 2008. This audit generated four non-compliances and one Observation, all of which were addressed in the company's response in June 2008.

Copies of the Audit Report and the Eco-Safe Systems response are in Appendix 1.

Supplier Audits

Supplier audits were completed by Mr. Colm Harkin (Environmental Manager SRCL).

Audits conducted;

- ATM Holland; June 2008.
- Lindensmidt Germany; June 2008.
- AGR Germany; June 2008.
- Ballynagran Landfill; November 2008.

Copies of the Audit Reports are in Appendix 2. All were satisfactory.

15. Environmental Objectives and Targets, 2007 / 2008

Objective / target	Actions required to achieve objective/ target	Responsible person(s)	Target date	Date completed	Progress
Reduce non compliant waste / reduced plant downtime	Customer communications programme / Reduction in downtime 2006 Vs 2008	General Manager / Commercial Manager	July 2008		Extensive customer training has been carried out by the Commercial Manager; based on waste segregation etc. A programme of bin labelling has also been carried out; i.e. 'No Metal'. A notable increase in waste for export is evident; i.e. potentially problem wastes are being diverted for Incineration.
Quantify emissions to sewer / minimise emissions	Record effluent data / compare 2006 Vs 2008	General Manager / Plant Manager / Environmental Manager	July 2008		An increase in effluent has been noted and is symptomatic of increased production at the site.
Minimise consumption / reduce from 07 Vs 08	Review treatment process for potential inefficiencies / % reductions in use	General Manager / Environmental Manager	July 2009		Figures have yet to be collated for the AER for 2008. A refurbishment of Line 1 is planned for early 2008; it is hope that this will reduce steam loss.

Review odours from operation / minimise	Develop assessment criteria	General Manager / Environmental Manager	July 2008		An assessment of the odour abatement kit has been conducted by Tony Hutchence. An upgrade of the extraction/abatement system is planned for early 2008.
Reduce diesel fuel use / Move towards renewable fuels	Review market alternatives / % increase in use of renewable fuel	General Manager / Environmental Manager	July 2008		A Pure Plant Oil vehicle fuel trial has been ongoing since December 2008. This is due for review June/July 2008.
Investigate emissions abatement from treatment process / achieve BAT	Review technologies / compare and contrast	Environmental Manager	July 2009		An assessment of the odour abatement kit has been conducted by Tony Hutchence. An upgrade of the extraction/abatement system is planned for early 2008.
Review waste and raw material use / minimise use	Audits to achieve data / improved practices	General Manager / Environmental Manager	July 2008		CH is to conduct an audit of raw materials and waste at a site level.
Investigate yard run off / minimise potential pollutants	Random sampling of run-off / achieve data	General Manger / Plant Manager / Environmental Manager	July 2008		Sampling of yard run off to be Conducted early 2008.

16. Environmental Management Programme

The Eco-Safe Systems site was added to the scope of the SRCL Ireland Limited EMS during 2008. The EMS achieved re-certification to ISO14001 during January of 2009. The programme below is from the Group EMS.

The programmes in place to achieve the EMS Objectives and Targets (above) are reviewed as part of the EMS Management Review Procedure. The management programmes in place for each Objective/Target are detailed as follows;

Ob 1 – Ongoing data collection for ‘process’ waste. Eco-Safe non compliant ‘export’ waste is to be added to this Objective for 2009. This is currently being tracked and recorded by FD.

Ob 2 – This will continue to be monitored with a view to looking into reduction. JJ has stated that production is showing a 13% increase for 2008 due to waste being transferred from Eco-Safe site. 2009 figures will allow improvements to be better noted.

Ob 3 – Figures collated for the AER for 2008. Gas has been purchased for the next 3 years. Production increase 13% for 2008 due to waste being transferred from Eco-Safe site. 2009 figures will allow improvements to be better noted. A poster and e-mail campaign has been utilised with a review to cutting energy use; results may be see in the year end figures. Refurbishment of Line 1 has been postponed until 2009; it is hoped that this will reduce steam loss.

Ob 4 – An assessment of the odour abatement kit has been conducted by Tony Hutchence (Eco-Safe Systems Engineer). An upgrade of the extraction/abatement system has been postponed till 2009.

Ob 5 – A Pure Plant Oil vehicle fuel trial has been ongoing since December 2008. Trails of this product have been successful; with two new vehicles on order. The installation of a larger capacity tank has been successful (10,000 Litres).

Ob 6 - An assessment of the odour abatement kit has been conducted by Tony Hutchence (Eco-Safe Systems Engineer). An upgrade of the extraction/abatement system has been postponed till 2009.

Ob 7 – CH is to conduct an audit of raw materials usage and waste at a site level by Q4 2008.

Ob 8 – Sampling of yard run off to be Conducted early 2008 and end of 2008.

17. New Procedures

A revised Environmental Management System (branded; SRCL Ireland Limited) was issued during 2008. This has been certified to the ISO14001 standard by SGS Ireland.

18. Noise

The annual noise monitoring for 2008 was completed at the specified boundary points on 12 February 2008.

Although readings exceed the Guidance Limits for daytime and night-time noise levels of 55 and 45dB(A) respectively, the company does not consider that they amount to any significant impairment of, or interference with, amenities beyond the site boundary; as the exceedances noted are due to local traffic and not to waste treatment operations.

The subcontractors report is available as Appendix 3.

19. Bund, Tank and Pipe Inspections

All bunds have been tested and certified during 2008. Copies of test reports have been sent to the Agency.

Underground pipes (drains) were inspected during 2006. An independent inspection was conducted and subsequent drainage repairs were conducted. This testing will be due again during 2011.

20. Financial Provision, Management Structure and Public Information

21. Financial Provision.

The Company is covered by Marsh Insurances for liabilities totalling €13m each for Employers Liability and Public Liability. Copies of Insurances are to be found in Appendix 4.

22. Management Structure

The present Management Structure at the site is detailed in Appendix 5.

Details of the responsibilities are as follows:

General Manager

The overall responsibility of the General Manager is to oversee the effective and efficient running of the Eco-Safe Systems Plant at all times and to ensure conformity with licence conditions. In the absence of the General Manager these duties will fall to Plant Manager.

- The General Manger is responsible for communication with suppliers.
- The General Manger has overall responsibility for finance.
- The General Manger is responsible for the allocation of resources.
- The General Manager is the named point of contact for the Environmental Regulator, the Sanitary Authority and the HSE.
- The General Manager Reports directly to the Operations Director.

Plant Manager

- The Plant Manager is responsible for the day to day operations on the shop floor.
- The Plant Manager reports directly to the General Manager.

Commercial Manager

- The Commercial Manager is responsible for external complaints & queries.
- The Commercial Manager is responsible for dealing with customer declarations and contracts.
- The Commercial Manager is responsible for liaisons with Eco-Safe Systems in terms of services.
- The Commercial Manager reports directly to the general manager.

Financial Manager

- The Financial Manager is responsible for the control of finance within SRCL.
- The Financial Manager is responsible for the IT Department.
- The Financial Manager reports directly to the General Manager.

Transport Manager

- The Transport Manager is responsible for the day to day transport operations of SRCL.

Operations Manager SQ (Transport)

- The Operations Manager SQ is responsible for the Small Quantity operations; formerly known as Transafe.

Offsite Management (Not based at site/ Corporate Resources)

Senior Management (Chief Executive Officer, Operations Director, Operations Manager, Head of Compliance).

- The Operations Director is responsible for overseeing the efficient operation of the Eco-Safe Systems.
- The Operations Director shall oversee the implementation of the management system for the facility in the absence of the General Manager.
- The Operations Director is the named contact person for communications with the Regulator / Sanitary Authority in the absence of the General Manager.
- The Operations Director shall conduct performance appraisals for key management staff on an annual basis.
- The Operations Director is responsible for communication with major customers.
- The Operations Director is responsible for Allocation of resources.
- The Operations Manager reports to the Operations Director.
- The Operations Director reports to the CEO.
- The Head of Compliance is responsible for Health and Safety and Environmental Issues; and reports to the CEO.

Environmental Manager

- The Environmental Manager will be responsible for the promotion of Environmental Compliance at SRCL. The Environmental Manager must be aware of and adhere to legal requirements in relation to Environmental Management and related topics.
- The Environmental Manager Reports to the Head of Compliance.

Health & Safety Manager

- The Health and Safety Manager will be responsible for the promotion of H&S Compliance at SRCL. The Environmental Manager must be aware of and adhere to legal requirements in relation to H&S and related topics.
- The Health and Safety Manager Reports to the Head of Compliance.

Human Resources Manager

- The Human Resources Manager will be responsible HR within SRCL. The Human Resources Manager must be aware of and adhere to legal requirements in relation to HR and related topics.
- The Human Resources Manager reports to the

All Personnel

- All Company employees are required to have an awareness of the possible environmental consequences of their actions, and are encouraged to report any adverse conditions and suggest improvements; and to operate the EMS and associated Procedures as appropriate.

23. Public Information

Public information is displayed on the Site Notice Board according to condition 3.3 2 of the Waste Licence. Certain documents are available on request at the site during normal office hours.

24. Boiler Efficiency Testing

Boiler testing completed during 2008. Under normal steam conditions operation was seen to be as per design.

25. Use of Quarantine Store

Unintentional submissions of waste are recorded. An 'Inappropriate Waste report' is completed in each case and the customer contacted.

26. Process Verification Report

27. Residuals Management Plan

This has been provided in Appendix 7 (Site Closure Plan). This does not require any additional information from the 2008 document.

28. Measures to Prevent Environmental Damage

SRCL Ireland Limited / Eco-Safe Systems operate an Environmental Management System that has been accredited to the ISO14001 standard during 2007; and is routinely audited by SGS Ireland. This system ensures compliance with environmental regulations and promotes good environmental practices while aiming for continual improvement.