



Ms. Suzanne Wylde,  
Inspector,  
Office of Climate, Licensing & Resource Use,  
Environmental Protection Agency,  
Headquarters P.O. Box 3000,  
Johnstown Castle Estate,  
County Wexford

28<sup>th</sup> August 2009

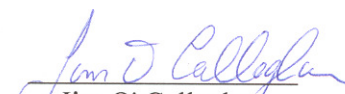
RE: Application for Waste Licence Ref. No. W0263-01 Irish Packaging Recycling Ltd,  
Walkinstown, Dublin 12

Dear Ms. Wylde,

On behalf of Irish Packaging Recycling Ltd, I enclose one original and one hard copy of responses to the Notices issued under Article 14 (2) (b) (ii) on the 28<sup>th</sup> May in relation to the application for a Waste Licence W0263-01. I also enclose 16 electronic copies on a CD-ROM in searchable pdf format. The content of the electronic files is a true copy of the original.

If you have any queries, please call me.

Yours sincerely,

  
Jim O'Callaghan

09013801/JOC/MC

Encs.

c.c. Mr David Naughton, PANDA Waste Services.



**Article 14(2)(b)(ii) Further Information**  
**Particulars and Evidence For**  
**Irish Packaging Recycling Ltd.**

**Waste Licence Application No.W0263-01**

**Article 12 Compliance**

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**Prepared For: -**

Irish Packaging Recycling Ltd.,  
Ballymount Road,  
Walkinstown,  
Dublin 12

**Prepared By: -**

O' Callaghan Moran & Associates,  
Granary House,  
Rutland Street,  
Cork.

**28<sup>th</sup> August 2009**

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# 1. INTRODUCTION

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This document presents the response by Irish Packaging Recycling Ltd. (IPR), Ballymount Road, Walkinstown, Dublin 12, to the Agency's Notice issued under Article 14(2)(b)(ii) of the Waste Management Licensing Regulations on the 28<sup>th</sup> May 2009, in relation to the application for a Waste Licence, Application Register No.W0263-01, for a non-hazardous materials recovery and transfer facility at Lower Ballymount Road, Walkinstown, Dublin 12.

Section 2 contains the responses to the Agency's requests. Section 3 contains the revised non-technical summary, which includes a summary of the information provided as part of this response. For ease of interpretation, each of the requests are presented in italics followed by IPR's response.

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## 2. ARTICLE 12 COMPLIANCE REQUIREMENTS

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1. *Identify all of the relevant waste activities in the Third and Fourth Schedules of the Waste Management Acts 1996 – 2008, to which the application relates. Confirm that the Principle activity at the site is Class 2 of the Fourth Schedule.*

The waste activities in the Third and Fourth Schedules of the Waste Management Acts 1996 – 2008 are:

### **Third Schedule – Waste Disposal Activities**

None

### **Fourth Schedule – Waste Recovery Activities**

- 2: 'Recycling or reclamation of organic substances, which are not used as solvents (including composting and other biological processes)'. (P)
- 3: 'Recycling or reclamation of metals and metal compounds'.
- 4: 'Recycling or reclamation of other inorganic materials'.
- 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 principal activity is Class 2 of the Fourth Schedule

2. *Clarify the address of the facility, i.e. located on Ballymount Road, Ballymount Road Lower or Lower Ballymount Road, as all three are referred to in the application.*

The facility is located at Lower Ballymount Road, Walkinstown, Dublin 12. The National Grid Reference is E310405, N231096

3. *Please confirm if South Dublin County Council Planning Department require an E.I.S. to be carried out for this facility, noting that an EIS is required for waste disposal activities with an annual intake greater than 25,000 tonnes, or at waste facilities where the extension of the development would result in an increase in size greater than 25% of the appropriate threshold. The information in the EIS should meet the EPA Guidelines on the Information to be Contained in Environmental Impact Statements (2002).*

OCM contacted the South Dublin County Council Planning Department and requested that they confirm if an EIS is required. The Planning Department has not yet responded to this request. A copy of the request submitted to the Council is enclosed as Attachment A.

4. *Clarify the maximum annual tonnage of waste to be handled at the site. Provide details of tonnages handled at the facility for years 2006, 2007, 2008 and 2009 (to date).*

The maximum annual tonnage to be handled at the site is 200,000 tonnes. The tonnages accepted in the years 2006 to 2009 (to date) are shown on Table 1.

**Table 1** – Tonnage Accepted at the facility

<b>Year</b>	<b>Tonnage Accepted</b>
2006	119,000
2007 (Jan – Aug)	78,000
2007 (during takeover)	44,624.50
2008	100,577.43
2009 (to date)	34,701

5. *The application states that the hours of the operation at the site as being 0600 to 0300. Clarify that this refers to 0600hrs to 1500hrs as per the 24-hour clock. Provide proposed details of proposed waste acceptance hours and facility hours of operation.*

The current hours of operation are 0600hrs (6 am) to 0300 hrs (3 am) Monday to Sunday as allowed under the current permit (WPR 021/2). However, due to the nature of the recycling business and the location within an industrial estate, it is proposed to operate 24 hours a day seven days a week.

6. During the site visit carried out by the EPA on 30<sup>th</sup> April 2009, the EPA was told of the applicant's intention to apply to accept mixed municipal waste and construction and demolition waste at the facility. Provide details of existing and proposed infrastructure for the handling of these waste streams.

It is proposed to accept approximately 50,000 tonnes of mixed municipal waste and 50,000 tonnes of construction and demolition wastes. All of these wastes will be handled and processed internally. The location of the proposed processing areas are shown on Figure 1. Additional equipment, comprising mechanical grabs, a front loading shovel and a conveyor will be provided.

7. Submit a floor plan showing the layout of the waste transfer building, to show recycling areas, segregation transfer areas, waste inspection areas, quarantine areas, etc.

Figure 1 is a floor plan of the layout of the waste transfer building. It includes the proposed Mixed MSW and C&D handling areas.

8. Provide details of fuel and energy (e.g. diesel, oil, water, electricity, etc) used on site including quantities typically stored on site and annual throughput. Table G.1 as submitted in the application form is not clear and should be completed in full.

**Table G.1 Details of Process related Raw Materials, Intermediates, Products, etc., used or generated on the site**

Ref. N <sup>o</sup> or Code	Material/ Substance <sup>(1)</sup>	CAS Number	Danger Category <sup>(2)</sup>	Amount Stored (tonnes)	Annual Usage (tonnes)	Nature of Use	R <sup>(3)</sup> - Phrase	S <sup>(3)</sup> - Phrase
	Oils/ Lubricants				3,000 litres	Plant		
	Road Diesel				90,000 litres	Plant/ Trucks		
	Disinfectant				80 litres	Cleaning		
	Gas Oil (Plant)				75,000 litres	Plant		
	Engine Oil				400 litres	Plant/ Trucks		
	Water				6500m <sup>3</sup>			
	Electricity				1,199.34 MWhr)			

- Notes: 1. In cases where a material comprises a number of distinct and available dangerous substances, please give details for each component substance.  
 2. c.f. Article 2(2) of SI N<sup>o</sup> 77/94  
 3. c.f. Schedules 2 and 3 of SI N<sup>o</sup> 77/94

9. Will there be an increase in the volumes of fuel and other oils used on the site given the proposed plans for expansion of the facility? Indicate current bunding provisions on site for fuel storage and locations of current/proposed spill kits on the site layout plan.

The proposal to accept mixed MSW and C&D wastes will require additional plant, as described in Response No 6. All the above ground fuel and oil storage tanks are provided with bunding. The location of the tanks, spill kits and fire extinguishers and bunded areas are shown on Drawing No. AE135-AC-02.

10. Complete the tables in Section H of the application form, ensuring that all waste categories are included

**TABLE H.1(A). QUANTITIES OF WASTE IN RELATION TO EACH CLASS OF ACTIVITY APPLIED FOR**

Waste Management Act 3rd Schedule (Disposal) Activities		Waste Management Act 4th Schedule (Recovery) Activities	
Class of Activity Applied For	Quantity (tpa)	Class of Activity Applied For	Quantity (tpa)
Class 1		Class 1	
Class 2		Class 2	100,000
Class 3		Class 3	50,000
Class 4		Class 4	50,000
Class 5		Class 5	
Class 6		Class 6	
Class 7		Class 7	
Class 8		Class 8	
Class 9		Class 9	
Class 10		Class 10	
Class 11		Class 11	
Class 12		Class 12	
Class 13		Class 13	Combined total of above

**Table H.1(B) Annual Quantities and Nature of Waste**

Year	Non-hazardous waste (tonnes per annum)	Hazardous waste (tonnes per annum)	Total annual quantity of waste (tonnes per annum)
2009	200,000	0	200,000



**Table H.1 (c) Waste Types and Quantities**

WASTE TYPE	TONNES PER ANNUM (existing)	TONNES PER ANNUM (proposed)	TOTAL (over life of site) tonnes
Household		75,000	UNKNOWN
Commercial		75,000	UNKNOWN
Sewage Sludge			0
Construction and Demolition		50,000	UNKNOWN
Industrial Non-Hazardous Sludges		0	0
Industrial Non-Hazardous Solids			
Hazardous *(Specify detail in Table H 1.2)		0	0
Inert Waste imported for restoration purposes	COMPLETE FOR LANDFILL & CONTAMINATED FACILITIES ONLY		

**\* Table H.1.2 Hazardous Waste Types and Quantities**

HAZARDOUS WASTE	DETAILED DESCRIPTION * REFERENCE SHOULD BE MADE TO THE RELEVANT EUROPEAN WASTE CATALOGUE CODES AS PRESENTED BY COMMISSION DECISION 2000/532/EC	Tonnes Per Annum (Existing)	(Tonnes Per Annum Proposed)
Waste Oil	N/A	0	0
Oil filters	N/A	0	0
Asbestos	N/A	0	0
Paint and Ink	N/A	0	0
Batteries	N/A	0	0
Fluorescent Light Bulbs	N/A	0	0
Contaminated Soils	N/A	0	0
<b>OTHER HAZARDOUS WASTE (APPLICANT TO SPECIFY)</b>			
			0

11. *Provide information to show that the applicant is likely to be in a position to meet any financial commitments or liabilities that may have been or will be entered into or incurred in carrying on the activity to which the application relates or in consequence of ceasing to carry out that activity.*

IPR have sufficient funds in place to provide for any potential environmental liabilities. IPR also have adequate insurance cover for environmental liabilities. A copy of the accounts for 2007 is included in Attachment B.

12. *Provide details of any correspondence, written or verbal, with the relevant local authority in relation to offences under the Litter Pollution Act (1997) or the Waste Management Act (1996-2008).*

Copies of the correspondence received from South Dublin County Council in relation to compliance with the current Waste Permit are enclosed in Attachment C.

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### 3. NON TECHNICAL SUMMARY WASTE LICENCE APPLICATION

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Irish Packaging Recycling Ltd (IPR), trading as PANDA Waste Services Ltd, is applying to the Environmental Protection Agency (Agency) for a Waste Licence for its facility at Ballymount Road, Walkinstown, Dublin 12.

The existing facility operates under a Waste Permit issued by South Dublin County Council (Ref WPR 021/2). The recently introduced Waste Management (Facility Permit and Registration) Regulations 2007, as amended introduced a processing threshold of 50,000 tonnes per year for waste recycling facilities. Facilities that accept more than that now require a Waste Licence.

This non-technical summary contains the information specified in Article 12 (1) (u) of the Waste Management (Licensing) Regulations, 2004 (S.I. No. 395 of 2004).

#### **Compliance with Requirements of the Waste Management Act 1996 to 2007**

Best Available Techniques (BAT) will be used to prevent/eliminate or, where this is not practicable, limit/abate/reduce emissions of environmental concern resulting from the recovery activities.

#### **Nature of the Facility**

The facility is a recycling activity that currently processes household and commercial & industrial recyclable materials, which are sorted and bulked up for transfer to recycling facilities. The recyclables include paper, cardboard, plastic, food and drinks cans, glass packaging and household electronic equipment. IPR also operates a confidential document shredding business at the site. The facility does not accept waste for disposal.

It is proposed to expand waste volumes to 200,000 tonnes per annum and accept mixed municipal solid waste from household and commercial sources and construction and demolition wastes. The municipal solid wastes will be subject to preliminary treatment at the facility before being sent for further treatment and recycling at the PANDA operated Materials Recovery Facility in County Meath (W0146-03). The construction and demolition waste will be subject to preliminary treatment before being sent to other PANDA operated recycling facilities for further treatment.

The facility currently operates from 6am to 3am Monday to Saturday. It is proposed to operate 24 hours a day, seven days a week.

### Classes of Activity

The relevant activities as per the Fourth Schedule of the Waste Management Acts 1996 – 2007 are: -

#### **Fourth Schedule – Waste Recovery Activities**

*Principal Activity:*

- 2: ‘Recycling or reclamation of organic substances, which are not used as solvents (including composting and other biological processes)’. (P)
- 3: ‘Recycling or reclamation of metals and metal compounds’.
- 4: ‘Recycling or reclamation of other inorganic materials’.
- 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’.

### Quantity and Nature of the Waste to be Recovered or Disposed

A maximum of 200,000 tonnes per annum will be accepted and a breakdown of the waste types is given in Table 1.

**Table 1** Waste Recovered

<b>Waste Type</b>	
Mixed Dry Recyclables	50,000*
Segregated Paper, Plastic and Cardboard	50,000*
Mixed Municipal Solid Waste	50,000*
Construction & Demolition Waste	50,000*
<b>Total</b>	<b>200,000</b>

\*Subject to Market Conditions. The individual quantities may change provided the overall limit is not exceeded.

## **Raw and Ancillary Materials, Substances, Preparations, Fuels & Energy used on the Site**

Raw materials and energy used at the facility include: -

- Diesel fuel on-site plant and equipment;
- Hydraulic oil and engine oil for use in on-site equipment;
- Electricity;
- Water.

## **Plant, Methods, Processes, Abatement, Recovery, Treatment and Operating Procedures**

The plant and equipment used on a regular basis include: -

- Balers;
- Air Compressor;
- Front Loading Shovels
- Mechanical Grabs;
- Shredder;
- Conveyor;
- Forklifts;
- Yardsweeper.

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## **Waste Processing**

The waste that will be accepted include pre-segregated and mixed materials that are delivered in compactors, rear end loaders, curtain side trailers and skips. The materials will be weighted at the weighbridge, inspected to ensure that they are suitable and then off-loaded inside the Recycling Building. Here the wastes will be inspected again and any unsuitable wastes will be immediately removed to a designated internal waste quarantine area.

The pre segregated material is currently moved to the baling units or loading bays where it is baled before being loaded onto curtain side trailers for removal off-site. The mixed waste will be separated manually and mechanically into the different waste streams (paper, cardboard, plastic, glass, metal, WEEE, organic fines). Depending on the type, these are and will be

either baled or bulked up and stored on-site, both internally and externally, until they are sent to off-site recovery facilities.

The construction and demolition waste will initially be sorted manually and mechanically and, depending on the type (wood, concrete rubble, soil, tiles) will either be shredded or screened to produce a saleable end product. Some of the materials will require further processing at other recycling facilities before they are suitable for use.

### **Information Related to Section 40(4) (a) to (d) of the Waste Management Act**

Emissions from facility include noise, dust and storm water run-off. The emissions will not result in the contravention of any relevant standard or emission limit prescribed under enactment. The proposed development is consistent with the policies and objectives Dublin Region Waste Management Plan and is contributing to meeting the Plan's recycling targets.

The Facility Manager has completed the FAS Waste Management Training Programme. The site activities are based on best management practice and take into consideration the draft BAT Guidance Note for the Waste Sector: Waste Transfer Activities published by the Agency. The facility operations, when carried out in accordance with licence conditions, will not cause environmental pollution.

Energy is used efficiently. The necessary measures required to ensure limited consequences for the environment from accidents or the permanent cessation of activities at the site will be taken.

### **Source, Location, Nature, Composition, Quantity, Level and Rate of Emissions**

#### *Surface Water / Groundwater*

A tributary of the Robinhood Stream flows along the northern site boundary, with a feeder open drain along the north-western boundary. Rainwater run-off from the site discharges to the stream on the northern boundary. The run-off is intermittent and weather dependant. There is no direct or indirect emission to groundwater.

#### *Dust*

It is not anticipated that dust will be a significant problem at the facility. All waste processing activities, which have the potential to generate dust (shredding screening), is and will be carried out inside the Recycling Building. The facility access roads, vehicle manoeuvring and parking areas are paved and cleaned at regular intervals with a yard sweeper.

## *Noise*

The noise sources include waste transport vehicles, forklifts and the equipment used to sort and recover the waste, all of which are and will be housed inside the building.

## **Assessment of the Effects of Emissions on the Environment**

### *Groundwater / Surface water*

The provision of extensive paved areas provided with surface water collection drains, and secondary containment of the oil storage area minimises the potential for short term direct or indirect discharges to ground or groundwater, including dangerous substances, in the event of spill or leak.

### *Dust*

A roadsweeper is hired in on an as needed basis during dry weather to clean the access road and paved yards.

### *Noise*

A noise survey has not been carried out to establish the noise levels, however no complaints have been received about noise from the site.

## **Monitoring and Sampling Points**

### *Dust*

Dust will be monitored at three locations on the property boundary biannually. The measurements will be carried out using Bergerhoff gauges specified in the German Engineering Institute VDI 2119 document entitled "Measurement of Dustfall Using the Bergerhoff Instrument (Standard Method).

### *Noise*

Noise will be monitored annually at the nearest noise sensitive locations and two boundary locations. The monitoring will be representative of daytime 30-minute L(A)eq and will be carried out in accordance with the ISO1996: Acoustics - Description and Measurement of Environmental Noise.

## *Surface Water*

The surface water discharge will be monitored on a quarterly basis. The parameters will include electrical conductivity, pH and hydrocarbons. As the discharge will be intermittent and linked to rainfall events, grab samples will be collected at the monitoring point.

### **Prevention and Recovery of Waste**

IPR operates a source separation system for office and canteen waste. Office paper and packaging waste is recovered on-site. Waste oils generated during plant and vehicle maintenance will be collected and sent off-site for recovery.

### **Off-site Treatment or Disposal of Solid or Liquid Wastes**

Non-recyclable office and canteen wastes are currently sent off site for disposal. Sanitary wastewater is discharged to the municipal sewer and treated in local authority waste water treatment plant. The facility does not generate any process wastewater.

### **Emergency Procedures to Prevent Unexpected Emissions**

IPR has prepared an Emergency Response Procedure for the facility that addresses all contingencies that might arise including fire, uncontrolled release of leachate and/or oil, facility closure failure and major injury. The procedure ensures a rapid response to any incident by trained staff and minimise the impact on the environment of any associated emissions.

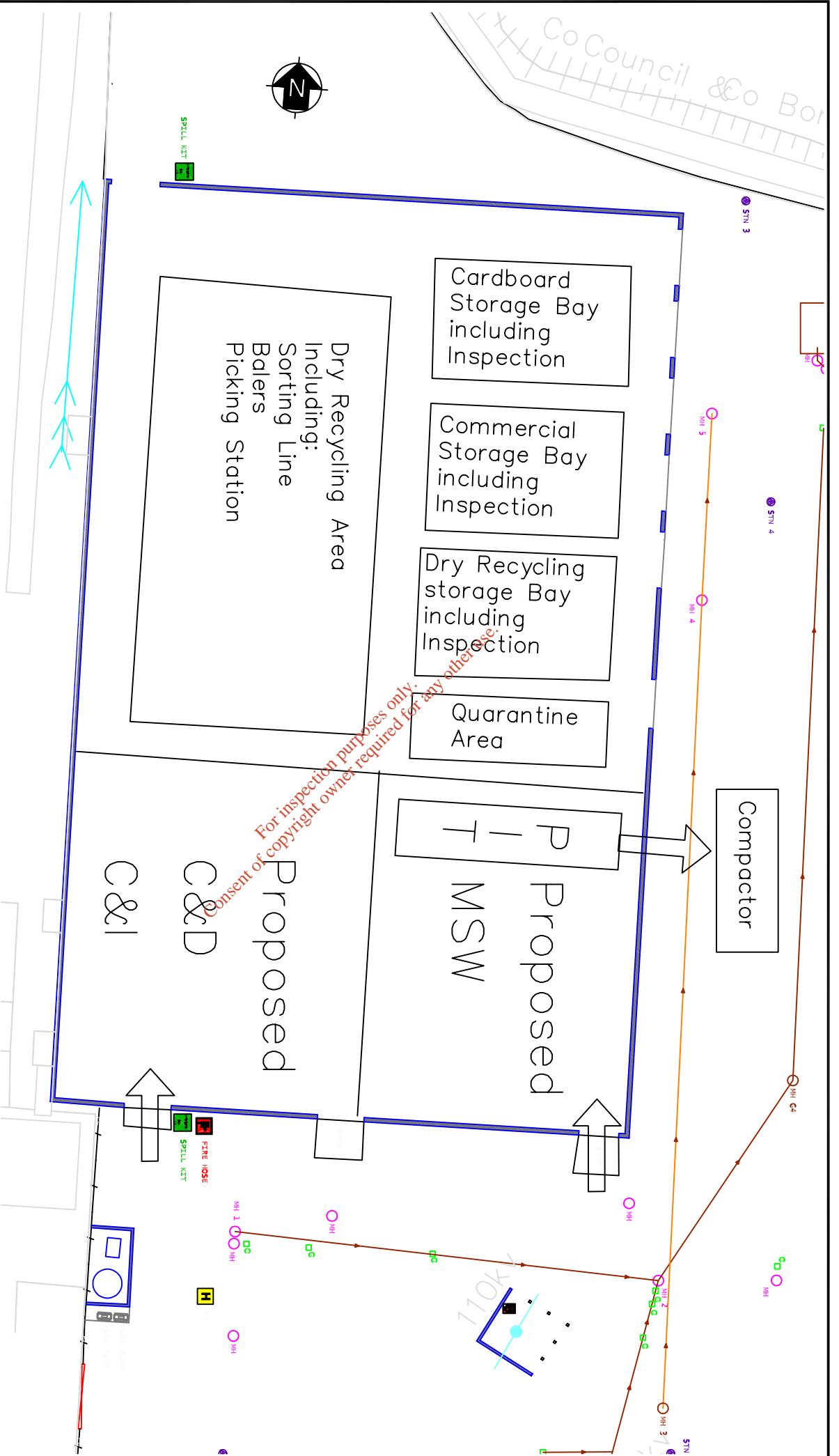
### **Closure, Restoration and Aftercare of the Site**

The entire site is either paved or occupied by buildings. It is not anticipated that the waste processing activities will cease in the medium to long term. In the unlikely event that the facility shuts down it will be closed and decommissioned in accordance with a Decommissioning Plan approved by the Agency. Post closure measures for the monitoring and maintenance of the building and the restored areas will be agreed with the Agency.



# **DRAWINGS**

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 Cork, Ireland.  
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 email : info@ocallaghanmoran.com

CLIENT

Irish Packaging Recycling Ltd.

FIGURE No.  
1

TITLE

Site Layout

SCALE

1:500

REV.

A

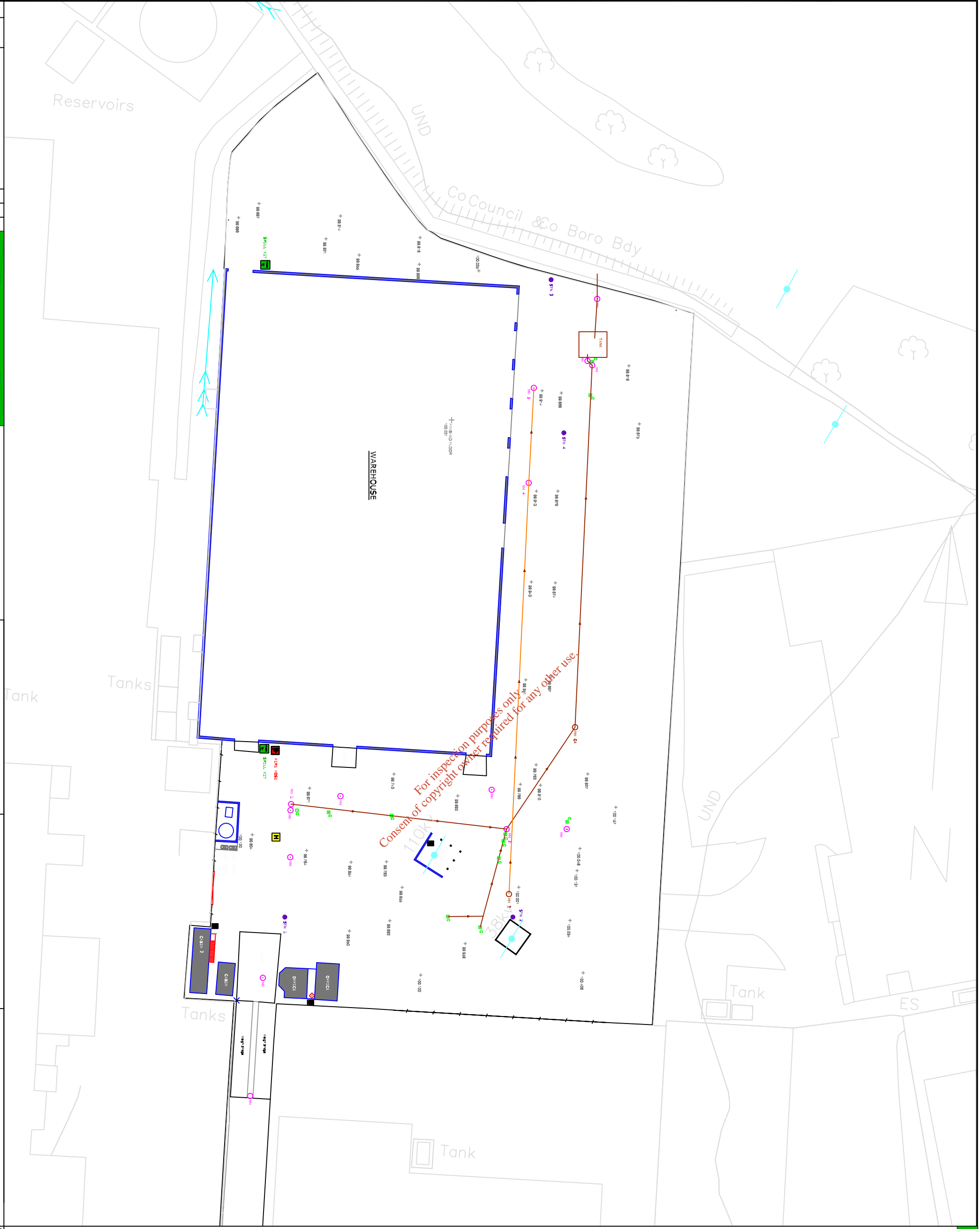
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environmental management for business

**GENERAL NOTES**

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 BALLYMOUNT RECYCLING CENTRE

**PROJECT:** AEI03  
 BALLYMOUNT RECYCLING CENTRE

**TITLE:**  
 AS CONSTRUCTED SURVEY

SCALE:	DRAWN:	CHECKED:	APPROVED:
N/S @ 1/3	SC	SC	SC
DRAWING NO. AEI35-1-C-02	DATE: 12.01.09	DATE: 12.01.09	DATE: 12.01.09

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# **ATTACHMENT A**

Copy of Request to Council

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**From:** Jim O'Callaghan [jim@ocallaghanmoran.com]  
**Sent:** 14 August 2009 14:34  
**To:** 'mjjudge@sdblincoco.ie'  
**Cc:** 'David Naughton'; 'Michael Watson'  
**Subject:** FW: Waste Licence Application W0263-01 Irish Packaging Recycling  
Dear Mr Judge,

I was in contact with John Quinlivan in relation to a Waste Licence application to the EPA on behalf of Irish Packaging Recycling (IPR) Ltd for its Ballymount Road Facility. The EPA has asked IPR to obtain confirmation from South Dublin County Council that an EIS is required. The details are set out below. I initially contacted Mr Quinlivan about this, as he had previously made a submission to the EPA on the need for an EIS. Mr Quinlivan recommended that I contact you concerning the need for the EIS, and I would appreciate if you could confirm SDCC's position on this. I attach, for your information, the submission made by Mr Quinlivan and a response to this by Solicitors acting for IPR.

**'Callaghan Moran & Associates  
Environmental & Hydrogeological Consultants**

Tel: 021 4321521  
Fax: 021 4321522  
Email: [jim@ocallaghanmoran.com](mailto:jim@ocallaghanmoran.com)  
Web: <http://www.ocallaghanmoran.com>

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-----Original Message-----

**From:** John Quinlivan [mailto:jquinlivan@SDUBLINCOCO.ie]  
**Sent:** 14 August 2009 12:11  
**To:** Jim O'Callaghan  
**Cc:** Michael Watson; David Naughton  
**Subject:** RE: Waste Licence Application W0263-01 Irish Packaging Recycling

Dear Mr O'Callaghan,

I refer to your correspondence and wish to acknowledge receipt of same. I am familiar with the content of the Article 14 request to IPRL and wish to point out that the EPA request refers IPRL to the Planning Authority rather than the Waste Authority in this matter. In order to assist, I recommend that you address your correspondence to Mr Martin Judge, Senior Executive Officer, Planning Department – mjjudge@sdblincoco.ie.

While the Article 14 request relates to the planning status of the facility rather than the waste management status, I can confirm that South Dublin County Council, as Waste Authority, continues to be of the view that an EIA/EIS is required in order for the EPA to consider the IPRL Waste Licence application.

I trust this is of assistance.

Yours Sincerely,

John Quinlivan  
Senior Executive Officer  
Environment Department

---

**From:** Jim O'Callaghan [mailto:jim@ocallaghanmoran.com]  
**Sent:** 14 August 2009 11:01  
**To:** John Quinlivan  
**Cc:** 'Michael Watson'; 'David Naughton'  
**Subject:** Waste Licence Application W0263-01 Irish Packaging Recycling

Dear Mr Qunlivan,

We are environmental consultants acting on behalf of Irish Packaging Recycling (IPR) in relation to the application for a Waste Licence for its Ballymount facility. The EPA has, in an Article 14 information request, asked that IPR obtain confirmation from South Dublin County Council that an EIS is required. I note that in March of this year the Council made a submission to the EPA in response to the licence application stating that an EIS was required, and I would appreciate if you could confirm if the Council is still of this opinion.

Regards,

Jim O'Callaghan

**O'Callaghan Moran & Associates**  
**Environmental & Hydrogeological Consultants**

Tel: 021 4321521  
Fax: 021 4321522  
Email: [jim@ocallaghanmoran.com](mailto:jim@ocallaghanmoran.com)  
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# **ATTACHMENT B**

Copy of Accounts 2007

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**IRISH PACKAGING  
RECYCLING LTD**

**FINANCIAL STATEMENTS**

**FOR THE PERIOD**

**1<sup>ST</sup> SEPTEMBER TO 31<sup>ST</sup>  
DECEMBER 2007**

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**COMPANY REGISTRATION NUMBER 438417**



**IRISH PACKAGING RECYCLING LTD**  
**FINANCIAL STATEMENTS**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

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# IRISH PACKAGING RECYCLING LTD

## THE DIRECTORS' REPORT

### FOR THE PERIOD ENDED 31ST DECEMBER 2007

The directors have pleasure in presenting their report and the financial statements of the company for the period ended 31st December 2007.

#### PRINCIPAL ACTIVITIES AND BUSINESS REVIEW

The principal activity of the company during the period was the packaging and recycling of paper and etc.

#### RESULTS, DIVIDENDS AND RETENTION

The profit for the period, after taxation, amounted to €599,220. The directors have not recommended a dividend.

The balance of profits for the period amounting to €599,220 will be carried forward to the following year.

#### FINANCIAL INSTRUMENTS

##### DIRECTORS

The directors and secretary who served the company during the period were as follows:

- Eamon Waters
- Brian McCabe

##### DIRECTORS' RESPONSIBILITIES

The directors are responsible for preparing the Annual Report and the financial statements in accordance with applicable Irish law and Generally Accepted Accounting Practice in Ireland including the accounting standards issued by the Accounting Standards Board and published by The Institute of Chartered Accountants in Ireland.

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

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

The directors confirm that they have complied with the above requirements in preparing the financial statements.

# IRISH PACKAGING RECYCLING LTD

## THE DIRECTORS' REPORT *(continued)*

### FOR THE PERIOD ENDED 31ST DECEMBER 2007

The directors are responsible for keeping proper books of account that disclose with reasonable accuracy at any time the financial position of the company and enable them to ensure that the financial statements are prepared in accordance with accounting standards generally accepted in Ireland and in conformity with Irish Statute comprising the Companies Acts 1963 to 2006. The directors are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

#### BOOKS OF ACCOUNT

The directors are aware of their responsibilities under Section 202 of the Companies Act 1990 to keep proper books of account. The directors have discharged this responsibility by ensuring that sufficient appropriate company resources were allocated to this task. The books of account are maintained at

#### AUDITOR

The auditor, Fagan Lynch Donnellan, will continue in office in accordance with section 160(2) of the Companies Act 1963.

Registered office:

Signed on behalf of the directors:

Ballinacorney  
Ballydrinagh  
Craaparc  
Cullym  
Meath

MR. EAMON WATERS

MR. BRIAN Mc CABE

Approved by the directors on 1st May 2008

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# IRISH PACKAGING RECYCLING LTD

## INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF IRISH PACKAGING RECYCLING LTD

FOR THE PERIOD ENDED 31ST DECEMBER 2007

We have audited the financial statements of Irish Packaging Recycling Ltd for the period ended 31st December 2007, which have been prepared on the basis of the accounting policies set out on pages 7 to 8.

### RESPECTIVE RESPONSIBILITIES OF DIRECTORS AND AUDITOR

As described in the Statement of Directors' Responsibilities the company's directors are responsible for the preparation of the financial statements in accordance with applicable law and Generally Accepted Accounting Practice in Ireland including the accounting standards issued by the Accounting Standards Board and published by the Institute of Chartered Accountants in Ireland.

Our responsibility is to audit the financial statements in accordance with relevant legal and regulatory requirements and International Standards on Auditing (UK and Ireland).

Our report is made solely to the company's members, as a body, in accordance with Section 193 of the Companies Act, 1990. Our audit work has been undertaken so that we might state to the company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company and the company's members as a body, for our audit work, for this report, or for the opinions we have formed.

We report to you our opinion as to whether the financial statements give a true and fair view, in accordance with Generally Accepted Accounting Practice in Ireland, and are properly prepared in accordance with the Companies Acts, 1963 to 2006. We also report to you whether in our opinion: proper books of account have been kept by the company; whether, at the balance sheet date, there exists a financial situation requiring the convening of an extraordinary general meeting of the company; and whether the information given in the directors' report is consistent with the financial statements. In addition, we state whether we have obtained all the information and explanations necessary for the purposes of our audit and whether the financial statements are in agreement with the books of account.

We also report to you if, in our opinion, any information specified by law regarding directors' remuneration and directors' transactions is not disclosed and, where practicable, include such information in our report.

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

### BASIS OF AUDIT OPINION

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

# IRISH PACKAGING RECYCLING LTD

## INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF IRISH PACKAGING RECYCLING LTD *(continued)*

FOR THE PERIOD ENDED 31ST DECEMBER 2007

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

### OPINION

In our opinion the financial statements:

give a true and fair view, in accordance with Generally Accepted Accounting Practice in Ireland, of the state of the company's affairs as at 31st December 2007 and of its profit for the period then ended; and

have been properly prepared in accordance with the requirements of the Companies Acts, 1963 to 2006.

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

In our opinion the information given in the Directors' Report on pages 1 to 3 is consistent with the financial statements.

The net assets of the company, as stated in the Balance Sheet on page 6, are more than half of the amount of its called up share capital and, in our opinion, on that basis there did not exist at 31st December 2007 a financial situation which, under Section 40(1) of the Companies (Amendment) Act, 1983, would require the convening of an extraordinary general meeting of the company.

Newbridge House  
Blumney  
Dublin  
D15 Meath

11 May 2008

FAGAN LYNCH DONNELLAN  
CHARTERED ACCOUNTANTS  
& REGISTERED AUDITORS

**IRISH PACKAGING RECYCLING LTD**  
**PROFIT AND LOSS ACCOUNT**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

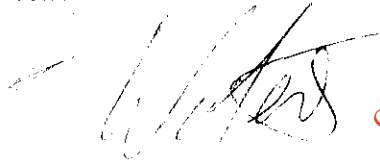
	Note	2007 €
<b>GROSS PROFIT</b>		<b>1,208,907</b>
Administrative expenses		<u>521,100</u>
<b>OPERATING PROFIT</b>	2	<b>687,807</b>
Interest payable and similar charges	4	<u>1,451</u>
<b>PROFIT ON ORDINARY ACTIVITIES BEFORE TAXATION</b>		<b>686,356</b>
Tax on profit on ordinary activities	5	<u>87,136</u>
<b>PROFIT FOR THE FINANCIAL PERIOD</b>		<b>599,220</b>

All of the activities of the company are classed as continuing.

The company has no recognised gains or losses other than the results for the period as set out above.

These financial statements were approved by the directors on the 1st May 2008 and are signed on their behalf by

MR. EAMON WATERS  
 Director



MR. BRIAN Mc CABE  
 Director



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The notes on pages 7 to 12 form part of these financial statements.

# IRISH PACKAGING RECYCLING LTD

## BALANCE SHEET

AS AT 31ST DECEMBER 2007

	Note		2007 €
<b>FIXED ASSETS</b>			
Intangible assets	6		2,130,958
<b>CURRENT ASSETS</b>			
Stocks	7	236,026	
Debtors	8	3,374,327	
Cash at bank		827,721	
		4,438,074	
<b>CREDITORS: Amounts falling due within one year</b>	9	5,876,857	
<b>NET CURRENT LIABILITIES</b>			<b>(1,438,783)</b>
<b>NET ASSETS LESS CURRENT LIABILITIES</b>			<b>692,175</b>
<b>CREDITORS: Amounts falling due after more than one year</b>	10		<b>92,855</b>
			<b>599,320</b>
<b>CAPITAL AND RESERVES</b>			
Called-up equity share capital	13		100
Profit and loss account			599,220
<b>SHAREHOLDERS' FUNDS</b>	14		<b>599,320</b>

These financial statements were approved by the directors and authorised for issue on 1st May 2008, and are signed on their behalf by

MR. EAMON WATERS



MR. BRIAN Mc CABE



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The notes on pages 7 to 12 form part of these financial statements.

**IRISH PACKAGING RECYCLING LTD**  
**NOTES TO THE FINANCIAL STATEMENTS**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

**ACCOUNTING POLICIES**

**Basis of accounting**

The financial statements are prepared in accordance with generally accepted accounting principles under the historical cost convention and comply with financial reporting standards of the Accounting Standards Board, as promulgated by the Institute of Chartered Accountants in Ireland, and Irish statute comprising the Companies Acts, 1963 to 2006

**Cash flow statement**

The directors have taken advantage of the exemption in Financial Reporting Standard No 1 (Revised 1996) from including a cash flow statement in the financial statements on the grounds that the company is small.

**Fixed assets**

All fixed assets are initially recorded at cost.

**Depreciation**

Depreciation is calculated so as to write off the cost of an asset, less its estimated residual value, over the useful economic life of that asset as follows:

Plant & Machinery	-	2.5% Straight Line
Leased Assets	-	Over the life of the lease

**Stocks**

Stocks are valued at the lower of cost and net realisable value, after making due allowance for obsolete and slow moving items.

**Operating lease agreements**

Rentals applicable to operating leases where substantially all of the benefits and risks of ownership remain with the lessor are charged against profits on a straight line basis over the period of the lease.



**IRISH PACKAGING RECYCLING LTD**  
**NOTES TO THE FINANCIAL STATEMENTS**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

**ACCOUNTING POLICIES** *(continued)*

**Financial instruments**

Financial liabilities and equity instruments are classified according to the substance of the contractual arrangements entered into. An equity instrument is any contract that evidences a residual interest in the assets of the entity after deducting all of its financial liabilities.

Where the contractual obligations of financial instruments (including share capital) are equivalent to a similar debt instrument, those financial instruments are classed as financial liabilities. Financial liabilities are presented as such in the balance sheet. Finance costs and gains or losses relating to financial liabilities are included in the profit and loss account. Finance costs are calculated so as to produce a constant rate of return on the outstanding liability.

**OPERATING PROFIT**

Operating profit is stated after charging:

	<b>2007</b>
	€
Directors' emoluments	---
Depreciation of owned fixed assets	97,376
Auditor's remuneration as auditor	6,000
Hire of plant and machinery	42,127
Operating lease costs:	
Other	157,813
	-----

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**IRISH PACKAGING RECYCLING LTD**  
**NOTES TO THE FINANCIAL STATEMENTS**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

**PARTICULARS OF EMPLOYEES**

The average number of staff employed by the company during the financial period amounted to:

	2007
	No
Number of production staff	19
Number of administrative staff	5
	24

The aggregate payroll costs of the above were:

	2007
	€
Wages and salaries	367,991
	367,991

**INTEREST PAYABLE AND SIMILAR CHARGES**

	2007
	€
Interest payable on bank borrowing	131
HP/Finance lease charges	1,320
	1,451

**TAXATION ON ORDINARY ACTIVITIES**

**Analysis of charge in the period**

	2007
	€
Current tax:	
Irish Corporation tax based on the results for the period at 12.5%	87,136
Total current tax	87,136

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**IRISH PACKAGING RECYCLING LTD**  
**NOTES TO THE FINANCIAL STATEMENTS**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

**TANGIBLE FIXED ASSETS**

	<b>Plant &amp; Machinery</b>	<b>Leased Assets</b>	<b>Total</b>
	€	€	€
<b>COST</b>			
Additions	2,100,000	128,334	2,228,334
<b>At 31st December 2007</b>	<u>2,100,000</u>	<u>128,334</u>	<u>2,228,334</u>
<b>DEPRECIATION</b>			
Charge for the period	87,500	9,876	97,376
<b>At 31st December 2007</b>	<u>87,500</u>	<u>9,876</u>	<u>97,376</u>
<b>NET BOOK VALUE</b>			
<b>At 31st December 2007</b>	<u>2,012,500</u>	<u>118,458</u>	<u>2,130,958</u>

**Hire purchase or lease agreements**

Included within the net book value of €2,130,958 is €118,458 relating to assets held under hire purchase or lease agreements. The depreciation charged to the financial statements in the period in respect of such assets amounted to €118,458.

**STOCKS**

	2007
	€
Stock	<u>236,026</u>

**DEBTORS**

	2007
	€
Trade debtors	2,614,456
VAT recoverable	759,871
	<u>3,374,327</u>

**IRISH PACKAGING RECYCLING LTD**  
**NOTES TO THE FINANCIAL STATEMENTS**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

**10 CREDITORS: Amounts falling due within one year**

		2007
	€	€
Trade creditors		3,325,555
Other creditors including taxation and social welfare:		
intergroup loan	2,396,998	
Corporation tax	87,136	
PAYE and social welfare	26,728	
finance lease agreements	25,667	
		2,536,529
Accruals and deferred income		14,773
		5,876,857

**11 CREDITORS: Amounts falling due after more than one year**

		2007
		€
Other creditors		
Finance lease agreements		92,855

**12 COMMITMENTS UNDER FINANCE LEASE AGREEMENTS**

Future commitments under finance lease agreements are as follows

		2007
		€
Amounts payable between 1 and 2 years		28,956
Amounts payable between 3 and 5 years		104,760
		133,716
Less interest and finance charges relating to future periods		(15,194)
		118,522
Finance lease agreements are analysed as follows:		
Current obligations		25,667
Non-current obligations		92,855
		118,522

**13 RELATED PARTY TRANSACTIONS**

The company has availed of the exemption under Financial Reporting Standard No 8 paragraph 8(C) which allows non-disclosure with other group companies

**IRISH PACKAGING RECYCLING LTD**  
**NOTES TO THE FINANCIAL STATEMENTS**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

**SHARE CAPITAL**

**Authorised share capital:**

	2007	
	€	
100,000 Ordinary shares of €1 each	100,000	<u>100,000</u>

**Allotted, called up and fully paid:**

	No	€
	100	100
Ordinary shares of €1 each		<u>100</u>

**RECONCILIATION OF MOVEMENTS IN SHAREHOLDERS' FUNDS**

	2007	
	€	
Profit for the financial period	599,220	
New ordinary share capital subscribed	100	<u>100</u>
Net addition to shareholders' funds	599,320	<u>599,320</u>
Closing shareholders' funds	599,320	<u>599,320</u>

**PARENT UNDERTAKING AND CONTROLLING PARTY**

The ultimate parent company is Nurendale Ltd, a company incorporated in the Republic of Ireland.

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**IRISH PACKAGING RECYCLING LTD**  
**MANAGEMENT INFORMATION**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

**The following pages do not form part of the statutory financial statements  
which are the subject of the independent auditor's report on pages 3 to 4.**

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**IRISH PACKAGING RECYCLING LTD**  
**DETAILED PROFIT AND LOSS ACCOUNT**  
**FOR THE PERIOD ENDED 31ST DECEMBER 2007**

	2007	€
<b>TURNOVER</b>		<b>5,087,685</b>
<b>COST OF SALES</b>		
Opening stock	157,871	
Purchases	2,975,409	
Disposal Charges	125,482	
Direct wages	221,849	
PSSI on direct labour	18,730	
Contract Work	76,433	
Repairs & Renewals	57,770	
Motor Travel & Subsistence	13,615	
Oil & Fuel	15,994	
Rent	405,524	
Insurance & Permits	4,000	
Depreciation of plant and machinery	42,127	
	<b>4,114,804</b>	
Closing stock	<b>(236,026)</b>	
		<b>3,878,778</b>
<b>GROSS PROFIT</b>		<b>1,208,907</b>
<b>OVERHEADS</b>		
Administrative expenses		<b>521,100</b>
<b>OPERATING PROFIT</b>		<b>687,807</b>
Interest payable		<b>(1,451)</b>
<b>PROFIT ON ORDINARY ACTIVITIES</b>		<b>686,356</b>

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# IRISH PACKAGING RECYCLING LTD

## NOTES TO THE DETAILED PROFIT AND LOSS ACCOUNT

FOR THE PERIOD ENDED 31ST DECEMBER 2007

	2007	€
<b>ADMINISTRATIVE EXPENSES</b>		
<b>Personnel costs</b>		
Wages and salaries	114,634	
Staff PRSI	8,811	
Redundancy Payments	3,967	
		<b>127,412</b>
<b>Establishment expenses</b>		
Rent	157,813	
Rates	4,922	
Light and heat	36,240	
Insurance	13,758	
		<b>212,733</b>
<b>General expenses</b>		
Telephone	3,950	
Printing, stationery and postage	1,743	
Travel expenses	22,744	
Laundry and cleaning	356	
Leases security	31,596	
Legal and professional fees	11,190	
Auditors remuneration	6,000	
Depn of plant and machinery	87,500	
Depreciation of Leased Assets	9,876	
		<b>180,955</b>
		<b>521,100</b>
<b>INTEREST PAYABLE</b>		
Bank interest payable		131
IF Finance lease charges		1,320
		<b>1,451</b>

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# **ATTACHMENT C**

Correspondence in relation to current Waste Permit

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SOUTH DUBLIN COUNTY COUNCIL  
COMHAIRLE CHONTAE ÁTHA CLIATH THEAS

Roinn Seirbhísí Comhshaoil,  
Bosca 4122  
Tamhlacht  
Baile Átha Cliath 24.

Telefón: 01-4149363  
Facs: 01-4149006  
www.southdublin.ie



Environmental Services  
Department,  
P.O. Box 4122  
County Hall  
Tallaght, Dublin 24.

Telephone: 01-4149363  
Fax: 01-4149006  
www.southdublin.ie

By registered post

18 January 2008

Irish Packaging Recycling Ltd. t/a Panda Waste Services Ltd.  
Rathdrinagh  
Beaupark Business Park  
Navan  
Co. Meath

**Re: Waste Permit Register Number WPR 021/2 (Waste Permit)**

Dear Sirs,

On 13 December 2007 a waste permit audit was carried out at Panda Waste Services Ltd's waste facility on Lower Ballymount Road, Walkinstown, Dublin 12. This audit was carried out by authorised officers under the Waste Management Acts 1996 – 2007 in the presence of Eamon Whelan and Mark Hennessy of Panda Waste Services Ltd.

The following breaches of the above Waste Permit for the facility were identified:

1. Glass and aluminium cans are being processed on-site in contravention of condition 1.1.
2. The site notice board does not contain the information specified in condition 4.1.
3. Glass and aluminium cans are accepted on-site in contravention of condition 5.1.

Panda Waste Services Ltd. is therefore required to cease the acceptance and processing of glass and aluminium cans at the facility and to rectify the second breach identified above. Please provide written confirmation of same within seven days of receipt of this notice. Failure to do so may result in a notice to cease all operations on the site and a suspension of the Waste Permit in accordance with condition 1.9 of the Waste Permit.

This notice is without prejudice to any other right or remedy of South Dublin County Council under the Waste Management Acts 1996 – 2007.

Yours faithfully,

John Quinlivan  
Senior Executive Officer  
Environmental Services  
South Dublin County Council

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**24 / 7 online customer query facility**

17<sup>th</sup> September 2008

Irish Packaging Recycling Limited  
Rathdrinagh  
Beauparc  
Navan  
Co. Meath

***By fax and by post***

Re: Inspection of Ballymount Facility (Permit Ref: WPR 021/2) on 2<sup>nd</sup> July 2008

Dear Sirs,

As you are aware an inspection was carried out on the above facility earlier in the Summer. A number of serious permit and statutory breaches were identified and the purpose of this letter is to set out these breaches and seek your commitment to refrain from continuing the offending activity and to adequately assure us that this commitment will not require the deployment of any further enforcement powers.

Arising out of the inspection, we note that there is an arrangement between Nurendale Limited ("Panda"), Veolia Environmental Services and Irish Packaging Recycling Limited ("IPRL") in relation to dry recyclable waste collected by Panda and transferred to IPRL's facility. From correspondence with Veolia, we understand that Panda's dry recyclable waste which includes WEEE, glass and can is initially transferred to Veolia's recycling and transfer facility at Ballymount (a short distance from IPRL's facility at Ballymount). The waste is then visually inspected by one or two persons for obvious contamination of general household waste, and such contamination is manually removed. Dry Recyclable waste from Veolia's commercial customers is at times added to the waste collected by Panda. The waste is then loaded into transfer trailers and brought to IPRL's Ballymount Facility.

As a result of our inspection and in light of the above arrangement, the following breaches of your permit were identified:

1. Despite previous confirmation (by letter dated 28<sup>th</sup> January 2008 from John Dunne) that no glass and can would be accepted, significant amounts of glass and can are still being accepted at Ballymount contrary to permit condition 5.1.
2. In addition, we note that significant amounts of waste electrical and electronic equipment ("WEEE") are now being accepted contrary to condition 5.1.
3. Without prejudice to the fact that IPRL is not entitled to accept WEEE, it is in any event being stored in contravention of article 20 of the Waste Management (WEEE) Regulations 2005, which provide that "any collection point and recovery facility carrying out the treatment of waste electrical and electronic equipment, shall ensure that its storage of waste electrical and electronic equipment complies with the technical requirements as set out in the Sixth Schedule". In light of our inspection team's observations and the photos (copies of which are enclosed), we are satisfied that the WEEE collected is not being stored appropriately.


4. Our position is that IPRI is not entitled to accept glass, can and WEEE at its facility, and Panda is not entitled to transfer such waste there, and to do so is a breach of both IPRI's permit and Panda's collection permit. Despite having sought and received your assurances previously on the acceptance of unauthorised waste at Ballymount, and having initiated proceedings on this point, you appear to have no intention of complying with the permit conditions in force.

We therefore seek further confirmation that:

1. IPRI will stop accepting can, glass, and or WEEE,
2. Without prejudice to the generality of the above, IPRI will not accept any unauthorised waste, and
3. IPRI will abide by the conditions of its permit in force.

Please furnish the above confirmation within 10 working days of the date of this letter.

Yours faithfully,

  
John Quinlivan  
Senior Executive Officer  
[jquinlivan@sdblincoco.ie](mailto:jquinlivan@sdblincoco.ie)

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Connecting You to Environmental  
Services Department  
Tel: 01 4149000  
Fax: 01 4149024

Mr David Naughton  
Environmental Manager  
Panda  
Beauparc Business Centre  
Navan  
Co. Meath

14 July 2009

RE: Request for return of documentation and Non compliance of AER 2008

Dear Mr Naughton,

Thank you for your email dated 5<sup>th</sup> June 2009, requesting the return of the balance of the paper documents retained by South Dublin County Council. Legal advice has been sought relating to this query and South Dublin County Council has been advised to continue to retain the original documents.

As this inspection/examination is ongoing, SDCC is entitled to take the original documentation from IPRL for the purposes of examination and inspection under section 11 4(f) of the Waste Management Act 1996 as amended.

Having reviewed the submitted AER 2008 for WPR 021 Irish Packaging Recycling Limited t/a Panda Waste Services Limited, Lower Ballymount Road, Walkinstown, Dublin 12, it has been found that it is non compliant with the conditions laid out in permit WPR 021. Condition 5 relates to Waste Acceptance and Handling, you are in breach of condition 5.1 and 5.2 which specifically refers to permitted waste streams, listing the EWC codes and their descriptions.

The following are unpermitted waste streams as listed in IPRL's AER 2008 in the waste acceptance spreadsheet;

Source of Waste	EWC	Description	Tonnage
Non-household Municipal Waste	20 01 40	Metals	16.86
Non-household Municipal Waste	20 03 01	Mixed Municipal Waste	439.39

The following are unpermitted waste streams as listed in IPRL's AER 2008 in the waste removed spreadsheet;

Source of Waste	EWC	Description	Tonnage
Transfer Station	20 01 40	Metals	16.86
Transfer Station	20 01 36	WEEE	29.56
Transfer Station	15 01 06	Glass	197.17
Transfer Station	20 01 40	Metal	39.48
Transfer Station	20 01 40	Metal	1.12
Transfer Station	20 03 01	Mixed Municipal Waste	61.96
Transfer Station	20 01 40	Metal	155.08
Transfer Station	20 01 40	Metal	18.17

Transfer Station	20 03 01	Mixed Municipal Waste	2,082.73
Transfer Station	20 03 01	Mixed Municipal Waste	514.37
Transfer Station	20 03 01	Mixed Dry Recyclables	429.34
Transfer Station	20 03 01	Mixed Dry Recyclables	524.08
Transfer Station	20 01 40	Metal	54.44

In IPRL's AER 2008, chapter 3.5 of the report lists the permitted waste streams as per permit WPR 021 Irish Packaging Recycling Limited t/a Panda Waste Services Limited, listing EWC codes and descriptions, this contradicts the EWC codes and descriptions listed in IPRL's waste accepted and removed spreadsheets of same AER, this is a breach of condition 5.

IPRL's permit application is dated 25 May 2007 and was granted on 1<sup>st</sup> September 2007, in the table listing Quantities and Nature of Waste or Wastes of IPRL's permit application, EWC 19 12 12 is predicted at 2,000 tonnes per annum, the quantity as listed in the AER 2008 for 19 12 12 is 14,380.58 tonnes per annum.

Please provide the following information in order to comply with the condition 3 of permit WPR 021;

1. Give details for the acceptance of unpermitted waste streams
2. Amend the incorrect descriptions of EWC codes listed in the spreadsheets of AER 2008
3. Give details for the acceptance of large quantities of waste stream 19 12 12
4. Provide proof of acceptance of waste from the following companies which are listed in the Waste Removed Spreadsheet AER 2008, with no details of waste facility permit or licence;
  - Dublin Airport Authority
  - Phelan & Ryan Trading, Clonmel, Co. Tipp
  - Burgmann Packaging, Tallaght
  - CLM Print Finishing Ltd, Greenogue
  - Erin Horticulture, Birr, Co. Offaly
  - H&K Eco Bedding Solutions, Nurney, Co. Kildare
  - Mick McQuaid, Stoneybatter, Dublin
  - Wellman International Ltd, Mullagh, Kells, Co. Meath
  - Armada Innovations, Oldcastle, Co. Meath

Compliance of permit WPR 021 Irish Packaging Recycling Limited t/a Panda Waste Services Limited, is obligatory in keeping with the requirements of the Waste Management (Facility Permit and Registration) Regulations, 2007 as amended.

Information to be referred to Carmel Smith, csmith@sdblincoco.ie by Friday 21<sup>st</sup> July 2009.

Yours sincerely,

  
 Leo Magee  
 Senior Engineer