Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

Licensing

Transfer of a Licence Application Form

This document does not purport to be and should not be considered a legal interpretation of the provisions and requirements of the Waste Management Acts, 1996 to 2003 / Environmental Protection Agency Acts 1992 & 2003.

Environmental Protection Agency
P.O. Box 3000, Johnstown Castle, County Wexford
Telephone: 053-60600 Fax: 053-60699

epa

Transfer of Licence Application Form

Not withstanding the provisions of Section 47 of the Waste Management Acts 1996 to 2003 or Section 94 of Environmental Protection Agency Acts 1992 & 2003 the following should be completed when applying to the Agency for the transfer of a Waste or IPPC Licence.

Licence Register Number	W0185-01
Contact details for a contact person or persons in relation to the application to transfer.	Colm Hussey
Location of activity to which the licence relates	Unit 14A1, Greenogue Business Park, Rathcoole, Co. Dublin
Name address and contact details of current licence holder	As above
Name address and contact details of proposed transferee	Rilta Environmental Ltd., 402, Greenogue Business Park, Rathcoole, Co. Dublin
When do the applicants want the transfer to take effect?	August 2009
Classes / Nature of Activity	As per original Licence W0185-01

Attachment A: Licence	Please provide as Attachment A (as per Section 47(3) of the Waste Management Acts 1996 to 2003 / Section 94 (3) of the Protection of the Environment Acts 1992 and 2003) a copy of the licence you wish to transfer. Attached.
Attachment B:	Please provide as Attachment B the following as appropriate: (a) Certified Copy of Certificate of Incorporation (b) Company's Number in Company's Registration Office and (c) Particulars of Registered Office of the Company *Does the proposed transferee have a parent company? If so please provide details here. Does the proposed transferee have any subsidiaries involved in the industrial installation or waste facility management? If so please give details here.*
Attachment C: Fit and Proper Person	The following information is required (please provide the information below or separately as Attachment C): 1. Indicate whether the applicant or other relevant person has been convicted under the PoE Act, the Waste Management Act 1996, the Local Government (Water pollution) Acts 1977 and 1990 or the Air Pollution Act 1987. N/A 2. Provide details of the applicant's technical knowledge and/or qualifications, along with that of other relevant employees (see details below). The applicant, Rilta Environmental, operates a similar waste licence (W0192-02) and has been doing so in various forms since 1999. Rilta Environmental's environmental manager has a B.Sc. in Geology and an M.Sc. in Environmental Geochemistry. He has been operating waste licences for ten years. 3. Provide information to show that the person 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.

	In relation to Question 2 above please give details here for each person who will or is likely to have responsibility for licensed activities, to include: a) the names of all persons who are to provide the management and supervision of the activities authorised by the licence, in particular the name of the facility manager and any nominated deputies; Mr. Eftim Ivanoff, Operations Director, Rilta Environmental Ltd. Mr. Colm Hussey, Facility/Environmental Manager, Rilta Env. Mr. Declan Geoghegan, Oil Treatment Plant Manager, Rilta Env. b) details of the responsibilities for each individual named under a) above; and The above named persons will oversee the changeover in the management of the site and the Waste Licence. Once the changeover has been complete, permanent site management will be put in place. c) details of the relevant education, training and experience held by each of the persons nominated under a) above. Colm Hussey has a Bachelor of Science (Geology) and a Master Of Science (Environmental Geology). He also has 10 years experience in the waste disposal/recovery business. Eftim Ivanoff has a Bachelor of Engineering and three years experience in the waste disposal/recovery business. Declan Geoghegan has two years experience in the waste disposal/recovery business.
Attachment D: Liabilities, requirements & obligations	Please provide a statement to show that the person to whom a licence is transferred has assumed and accepted all liabilities, requirements and obligations provided for in or arising under the licence, or revised licence, regardless of how and in respect of what period, including a period prior to the transfer of the licence or revised licence they may arise.
Attachment E: Transferee Licence details	Has the proposed transferee, their parent company or any 'relevant person' had an application for a licence granted? Please provide details here or separately as Attachment E. Rilta Environmental Ltd. already operates a business to similar Waste Licence conditions (W0192-02).

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Attachment F: Estimated Expenditure & Financial Provisions	Please provide, as attachment F, a plan showing the estimated expenditure for each phase of the activity/activities. The plan should include the likely costs of: (i) Abatement Installation, Control & Monitoring (ii) Closure & Remediation of the site (iii) Clean-up following a plausible accident/incident (iv) Long-term aftercare for residual environmental liabilities. The Plan should include a statement or details of provisions made for the underwriting of these costs/liabilities. Please see ELRA for W0185-01 attached.
Application Fee	To ensure that your application is valid and can be processed please submit payment of one of the following amounts with your application to transfer the licence; Waste Licence Transfer Application - €5,000 IPPC Licence Transfer Application - €2,000

We, the undersigned, are applying to the Environmental Protection Agency, as per Section 47 of the Waste Management Acts 1996 to 2003 (Waste Transfer) / Section 94 of the Environmental Protection Agency Acts 1992 & 2003 (IPPC Transfer) (delete as appropriate) for the transfer of licence no W0185-01 from Cedar Waste Management to Rilta Environmental Ltd.

Signed: _____ Signed : _____

Licensee BRENDAN KEANE
MANAGING DIRECTOR

Proposed Transferee

Date: 17/9/09 Date: 22/09/09

Company Seal

Rilta Environmental Limited
Block 402 Greenogue Business Park
Rathcoole, Co. Dublin
Tel 01 4018000 Fax 01 4018080
VAT No. IE 6394837N

Company Seal

Attachment A: Licence No.W0185-01

Headquarters
P.O. Box 3000
Johnstown Castle Estate
County Wexford
Ireland

WASTE LICENCE

HAZARDOUS TRANSFER STATION

Waste Licence Register Number:	185-1
Licensee:	Cara Waste Management Limited
Location of Facility:	Site No. 14A1, Greenogue Business Park, Rathcoole, County Dublin.

INTRODUCTION

This introduction is not part of the licence and does not purport to be a legal interpretation of the licence.

This waste licence is for the operation of a hazardous waste transfer station at a facility of Cara Waste Management Limited. The transfer station is designed to be capable of handling 60,000 tonnes of waste per annum of which 33,000 tonnes will be hazardous waste while the remaining 27,000 tonnes will be non-hazardous.

The principal elements of the development are listed as follows:

- *Main warehouse building to be used for the handling and bulking of waste prior to onward transport to relevant recycling/recovery/disposal facilities.*
- *Site infrastructure including a weighbridge, transfer building, office building, access road and car parking facilities.*
- *Hazardous waste storage facilities.*
- *3 tanker parking bays.*

The activities at this facility will entail acceptance, sorting and repackaging/bulking-up of waste including household hazardous waste, dismantling of waste electrical and electronic equipment (WEEE), provision of tanker overnight parking facility and onward shipment to recycling/recovery and disposal facilities.

The licensee is required to manage and operate the facility to ensure that the activities do not cause environmental pollution. The licensee is required to carry out regular environmental monitoring and submit all monitoring results, and a wide range of reports on the operation and management of the facility to the Agency.

The licence sets out in detail the conditions under which Cara Waste Management Limited will operate and manage this facility.

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DECISION & REASONS FOR THE DECISION

Reasons for the Decision

On the basis of the information before it, the Environmental Protection Agency is satisfied that the waste activity, or activities, licensed hereunder in Part I will comply with the requirements of Section 40(4) of the Waste Management Act, 1996.

In reaching this decision the Environmental Protection Agency has considered the application and supporting documentation received from the applicant and the report of its inspector. No objection having been received to the Proposed Decision, the licence is granted in accordance with the terms of the Proposed Decision and the reasons therefor.

INTERPRETATION

All terms in this licence should be interpreted in accordance with the definitions in the Waste Management Act, 1996, (the Act), unless otherwise defined in this section.

Aerosol	A suspension of solid or liquid particles in a gaseous medium.
Adequate lighting	20 lux measured at ground level.
Agreement	Agreement in writing.
Annually	At approximately twelve monthly intervals.
Attachment	Any reference to Attachments in this licence refers to attachments submitted as part of the waste licence application.
Application	The application by the licensee for this waste licence.
Appropriate facility	A waste management facility, duly authorised under relevant law and technically suitable.
BAT	Best Available Techniques as defined by Section 7 of The Protection of the Environment Act, 2003, amending Section 5 of the EPA Act, 1992.
Bi-annually	All or part of a period of six consecutive months.
Biodegradable Waste	Any waste that is capable of undergoing anaerobic or aerobic decomposition, such as food, garden waste, sewage sludge, paper and paperboard.
CEN	Comité Européen De Normalisation – European Committee for Standardisation
Condition	A condition of this licence.
Consignment Note	All movements of hazardous waste within Ireland must be accompanied by a "C1" consignment note issued by a local authority under the Waste Management (Movement of Hazardous Waste) Regulations (SI No. 147 of 1998). Transfrontier shipment notification and movement/tracking form numbers are required for all exports of waste from, into or through the state under the Waste Management (Transfrontier Shipment of Waste) Regulations (SI No. 149 of 1998).

Construction and Demolition Waste	All wastes which arise from construction, renovation and demolition activities.
Containment boom	A boom which can contain spillages and prevent them from entering drains or watercourses.
Daytime	8.00 a.m. to 10.00 p.m.
Documentation	Any report, record, result, data, drawing, proposal, interpretation or other document in written or electronic form which is required by this licence.
Drawing	Any reference to a drawing or drawing number means a drawing or drawing number contained in the application, unless otherwise specified in this licence.
Emergency	Those occurrences defined in Condition 9.4.
Emission Limits	Those limits, including concentration limits and deposition levels established in *Schedule C: Emission Limits,* of this licence.
European Waste Catalogue (EWC)	A harmonised, non-exhaustive list of wastes drawn up by the European Commission and published as Commission Decision 2000/532/EC and any subsequent amendment published in the Official Journal of the European Community.
Foul water	Sewage and drainage from waste transfer building, wheelwash, truck wash, ramp, weighbridges vehicle cleaning, ejector trailer parking areas and run-off from hardstanding areas associated with waste processing.
Green waste	Waste wood (excluding timber), plant matter such as grass cuttings, and other vegetation.
Hours of Operation	The hours during which the facility is authorised to be operational. The hours of operation of a facility are usually longer than the hours of waste acceptance to facilitate preparatory and completion works, such as the removal and laying of daily cover. Different activities within the facility, such as the civic waste facility, may have different hours of waste acceptance.
Hours of Waste Acceptance	The hours during which the facility is authorised to accept waste. Different activities within the facility, such as the civic waste facility, may have different hours of waste acceptance.
Incident	The following shall constitute an incident for the purposes of this licence: a) an emergency; b) any emission which does not comply with the requirements of this licence; c) any exceedence of the daily duty capacity of the waste handling equipment; d) any trigger level specified in this licence which is attained or exceeded; and, e) any indication that environmental pollution has, or may have, taken place.
Industrial Waste	As defined in Section 5(1) of the Act.

Inert waste	Waste that does not undergo any significant physical, chemical or biological transformations. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular not endanger the quality of surface water and/or groundwater.
Licence	A Waste Licence issued in accordance with the Act.
Licensee	Cara Waste Management Limited
Liquid Waste	Any waste in liquid form and containing less than 2% dry matter. Any waste tankered to the facility.
Maintain	Keep in a fit state, including such regular inspection, servicing, calibration and repair as may be necessary to adequately perform its function.
Mobile Plant	Self-propelled machinery used for the emplacement of wastes or for the construction of specified engineering works.
Monthly	A minimum of 12 times per year, at approximately monthly intervals.
Municipal waste	As defined in Section 5(1) of the Act.
Night-time	10.00 p.m. to 8.00 a.m.
Noise Sensitive Location (NSL)	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Oil Separator	Device installed according to the draft European Standard prEN 858 (Installations for the separation of light liquids, e.g. oil and petrol).
Recyclable Materials	Those waste types, such as cardboard, batteries, gas cylinders, etc., which may be recycled.
Quarterly	At approximately three monthly intervals.
Sanitary Authority	South Dublin County Council.
Sample(s)	Unless the context of this licence indicates to the contrary, samples shall include measurements by electronic instruments.
SOP	Standard Operating Procedure.
Specified Emissions	Those emissions listed in *Schedule C: Emission Limits* of this licence.
Specified Engineering Works	Those engineering works listed in *Schedule B: Specified Engineering Works* of this licence.
SEW	Specified Engineering Works
TOC	Total Organic Carbon.
Trigger Level	A parameter value specified in the licence, the achievement or exceedance of which requires certain actions to be taken by the licensee.

Weekly	During all weeks of plant operation, and in the case of emissions, when emissions are taking place, with no more than one measurement in any one week.
White Goods	Refrigerators, cookers, ovens and other similar appliances.
EPA Working Day	Refers to the following hours: 9.00 a.m. to 5.30 p.m. Monday to Friday inclusive.

Part I Schedule of Activities Licensed

In pursuance of the powers conferred on it by the Waste Management Act, 1996, the Environmental Protection Agency (the Agency), under Section 40(1) of the said Act hereby grants this Waste Licence to Cara Waste Management Limited to carry on the waste activity/activities listed below at Site No. 14A1, Greenogue Business Park, Rathcoole, County Dublin, subject to conditions, with the reasons therefore and the associated schedules attached thereto set out in the licence.

Licensed Waste Disposal Activities, in accordance with the Third Schedule of the Waste Management Act, 1996

Class 7.	**Physico-chemical treatment not referred to elsewhere in this Schedule (including evaporation, drying and calcination) which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1. to 10. of this Schedule:** This activity relates to the shredding of waste materials, including, household hazardous waste containers and metals, plastics, card and paper. Physico-chemical treatment may be carried out on effluents to meet discharge criteria.
Class 11.	**Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.** This activity relates to bulking-up of waste on-site prior to shipment of waste for disposal off-site.
Class 12.	**Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.** This activity relates to the baling and repackaging of various waste types prior to disposal off-site.
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.** This activity relates to the storage of hazardous and non-hazardous waste at the facility prior to disposal off-site.

Licensed Waste Recovery Activities, in accordance with the Fourth Schedule of the Waste Management Act, 1996

Class 2.	**Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes):** This activity relates to the recycling of various organic substances including, wood, paper/cardboard, textile materials and vegetable oils.
Class 3.	**Recycling or reclamation of metals and metal compounds:** This activity relates to the dismantling, shredding, baling and recycling of various metal wastes.
Class 4.	**Recycling or reclamation of other inorganic materials:** This activity is limited to the reclamation of refrigerator gasses.

Class 11.	**Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule:** This activity is to make provision for the acceptance on-site for transfer to an appropriate facility of waste that has been obtained from any activity referred to previously in the Schedule.
Class 12.	**Exchange of waste for submission to any activity referred to in a preceding paragraph of this Schedule:** This activity refers to the exchange of certain waste types and their packaging for further processing off-site
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:** This activity is limited to the storage of waste at the facility prior to off-site recovery.

PART II CONDITIONS

CONDITION 1 SCOPE OF THE LICENCE

1.1. Waste activities at the facility shall be restricted to those listed and described in *Part I: Activities Licensed* and authorised by this licence.

1.2. For the purposes of this licence, the facility is the area of land outlined in red on Drawing No. 569-42-102 entitled 'Site Plan' in attachment B5 of the application. Any reference in this licence to "facility" shall mean the area thus outlined in red.

1.3. This licence is for the purposes of waste licensing under the Waste Management Act, 1996 only and nothing in this licence shall be construed as negating the licensee's statutory obligations or requirements under any other enactments or regulations.

1.4. Only those waste categories and quantities listed in *Schedule A: Waste Acceptance* of this licence, shall be accepted at the facility.

1.4.1 Waste shall be accepted at the facility, only from customers who are holders of a waste permit, unless exempted, under the Waste Management (Collection Permit) 2001 or from other licensed/permitted facilities.

1.5. Waste Acceptance Hours and Hours of Operation.

1.5.1. Unless otherwise agreed by the Agency, waste shall not be accepted at the facility on Sundays or on Bank Holidays.

1.6 Every plan, programme or proposal submitted to the Agency for its agreement pursuant to any Condition of this licence shall include a proposed timescale for its implementation. The Agency may modify or alter any such plan, programme or proposal in so far as it considers such modification or alteration to be necessary and shall notify the licensee in writing of any such modification or alteration. Every such plan, programme or proposal shall be carried out within the timescale fixed by the Agency but shall not be undertaken without the agreement of the Agency. Every such plan, programme or proposal agreed by the Agency shall be covered by the conditions of this licence.

REASON: *To clarify the scope of this licence.*

CONDITION 2 MANAGEMENT OF THE FACILITY

2.1 Facility Management

2.1.1 The licensee shall employ a suitably qualified and experienced facility manager who shall be designated as the person in charge. The facility manager or a nominated, suitably qualified and experienced, deputy shall be present on the facility at all times during its operation.

2.1.2 Both the facility manager and deputy, and any replacement manager or deputy, shall successfully complete both the FAS waste management training programme (or equivalent agreed by the Agency) and associated on site assessment appraisal within twelve months of appointment.

2.1.3 The licensee shall ensure that personnel performing specifically assigned tasks shall be qualified on the basis of appropriate education, training and experience, as required and shall be aware of the requirements of this licence.

2.2 Management Structure

2.2.1 Within three months from the date of grant of this licence, the licensee shall submit written details of the management structure of the facility to the Agency. Any proposed replacement in the management structure shall be notified in advance in writing to the Agency. Written details of the management structure shall include the following information.

a) the names of all persons who are to provide the management and supervision of the waste activities authorised by the licence, in particular the name of the facility manager and any nominated deputies;

b) details of the responsibilities for each individual named under a) above; and

c) details of the relevant education, training and experience held by each of the persons nominated under a) above.

2.3 Environmental Management System (EMS)

2.3.1 The licensee shall within three months of the date of grant of the licence establish and maintain an EMS. The EMS shall be updated on an annual basis with amendments being submitted to the Agency for its agreement.

2.3.2 The EMS shall include as a minimum the following elements:

2.3.2.1 Schedule of Environmental Objectives and Targets

The objectives should be specific and the targets measurable. The Schedule shall address a five-year period as a minimum. The Schedule shall include a time-scale for achieving the objectives and targets and shall comply with any other written guidance issued by the Agency.

2.3.2.2 Environmental Management Plan (EMP)

The EMP shall include, as a minimum, the following:

(i) methods by which the objectives and targets will be achieved in the coming year and the designation of responsibility for targets;

(ii) any other items required by written guidance issued by the Agency.

2.3.2.3 Corrective Action Procedures

The Corrective Action Procedures shall detail the corrective actions to be taken should any of the procedures detailed in the EMS not be followed.

2.3.2.4 Awareness and Training Programme

The Awareness and Training Programme shall identify training needs, for personnel who work in or have responsibility for the licensed facility.

2.4 Communications Programme

2.4.1 The licensee shall establish and maintain a Communications Programme to ensure that members of the public can obtain information at the facility, at all reasonable

times, concerning the environmental performance of the facility. This shall be established within six months of the date of grant of this licence.

REASON: *To make provision for the proper management of the activity on a planned basis having regard to the desirability of ongoing assessment, recording and reporting of matters affecting the environment.*

CONDITION 3 FACILITY INFRASTRUCTURE

3.1 The licensee shall establish all infrastructure referred to in this licence prior to the commencement of the licensed activities or as required by the conditions of this licence.

3.2 Specified Engineering Works

3.2.1 The licensee shall submit proposals for all Specified Engineering Works, as defined in *Schedule B: Specified Engineering Works* of this licence, to the Agency for its agreement at least two months prior to the intended date of commencement of any such works. No such works shall be carried out without the prior agreement of the Agency.

3.2.2 All specified engineering works shall be supervised by a competent person(s) and that person, or persons, shall be present at all times during which relevant works are being undertaken.

3.3 Facility Notice Board

3.3.1 The licensee shall provide and maintain a Facility Notice Board on the facility so that it is legible to persons outside the main entrance to the facility. The minimum dimensions of the board shall be 1200 mm by 750 mm.

3.3.2 The board shall clearly show:-

a) the name and telephone number of the facility;

b) the normal hours of opening;

c) the name of the licence holder;

d) an emergency out of hours contact telephone number;

e) the licence reference number; and

f) where environmental information relating to the facility can be obtained.

3.4 The licensee shall provide and maintain a plan of the facility (1200mm x 750mm) clearly identifying the location of each storage and treatment area. The plan shall be displayed as close as possible to the entrance of the facility on durable material such that it is legible at all times. The plan shall be replaced as material changes to the facility are made.

3.5 Facility Security

3.5.1 The licensee shall establish and maintain the site security arrangements as referred to in Section D.1 (a) of the application.

3.5.2 The licensee shall remedy any defect in the gates and/or fencing as follows:-

a) a temporary repair shall be made by the end of the working day; and

b) a repair to the standard of the original gates and/or fencing shall be undertaken within three working days.

3.6 Facility Roads/Hardstanding and Traffic Layout

3.6.1 Effective site roads shall be provided and maintained to ensure the safe movement of vehicles within the facility.

3.6.2 The licensee shall provide, and maintain an impermeable hardstanding surface in the areas of the facility shown on Drawing 569-42-111 entitled *Hardstanding Areas*, submitted in the Article 14 response, the areas shall be concreted and constructed to British Standard 8110.

3.6.3 Traffic layout at the facility shall be such that emergency services' vehicles shall have access to all parts of the facility at all times.

3.7 Facility Office

3.7.1 The licensee shall provide and maintain an office at the facility. The office shall be constructed and maintained in a manner suitable for the processing and storing of documentation.

3.7.2 The licensee shall provide and maintain a working telephone and a method for electronic transfer of information at the facility.

3.8. Waste Inspection and Quarantine Areas

3.8.1. A Waste Inspection Area and a Waste Quarantine Area shall be provided and maintained at the facility.

3.8.2. These areas shall be constructed and maintained in a manner suitable, and be of a size appropriate, for the inspection of waste and subsequent quarantine if required. The waste inspection area and the waste quarantine area shall be clearly identified and segregated from each other.

3.8.3. Drainage from these areas shall be collected and managed in accordance with their contents.

3.9. Weighbridge and Wheel Cleaning

3.9.1. The licensee shall provide and maintain a weighbridge and a wheel cleaner at the facility.

3.9.2. The wheel cleaner shall be used by all vehicles leaving the facility as required to ensure that no process water or waste is carried off-site. All water from the wheel cleaning area shall be directed to the wastewater interceptor.

3.10. Waste handling, ventilation and processing plant

3.10.1 Items of plant deemed critical to the efficient and adequate processing of waste at the facility (including *inter alia* waste loading vehicles and ejector trailers) shall be provided on the following basis:-

a) 100% duty capacity;

b) 25% standby capacity available on a routine basis; and

c) Provision of contingency arrangements and/or back up and spares in the case of breakdown of critical equipment.

3.10.2 Prior to the commencement of waste activities the licensee shall provide a report for the agreement of the Agency detailing the duty and standby capacity in tonnes per day, of all waste handling and processing equipment to be used at the facility. These capacities shall be based on the licensed waste intake, as per *Schedule A: Waste Acceptance,* of this licence.

3.10.3 The quantity of waste to be accepted at the facility on a daily basis shall not exceed the duty capacity of the equipment at the facility. Any exceedance of this intake shall be treated as an incident.

3.11. Tank and Drum Storage Areas

3.11.1. Construction of the bunded areas shall be in accordance with any guidance issued by the Agency.

3.11.2. All hazardous waste storage areas shall be rendered impervious to the materials stored therein.

3.11.3. All tank and drum storage areas shall be rendered impervious to the materials stored therein.

3.11.4. All tank and drum storage areas shall, as a minimum, be bunded, either locally or remotely, to a volume not less than the greater of the following:-

a) 110% of the capacity of the largest tank or drum within the bunded area; or

b) 25% of the total volume of substance which could be stored within the bunded area.

3.11.5. All drainage from bunded areas shall be diverted for collection and safe disposal.

3.11.6. All inlets, outlets, vent pipes, valves and gauges must be within the bunded area.

3.11.7. Each bunded area shall be clearly labelled so that it is legible to persons outside the bunded area and shall clearly indicate the material class type that can be stored in that area and the maximum quantity of material that can be stored therein. The arrangements shall ensure that no mixing of incompatible substances, as a result of spillages or otherwise, shall take place.

3.11.8. All spillages and liquids recovered from bunded areas shall be treated as hazardous waste unless they are known to be otherwise. All drainage from bunded areas shall be diverted for collection and appropriate recovery or disposal.

3.11.9. The integrity and water tightness of all the bunds and their resistance to penetration by water or other materials stored therein shall be confirmed by the licensee and shall be reported to the Agency following its installation and prior to its use as a storage area. This confirmation shall be repeated at least once every three years thereafter and reported to the Agency as part of the AER.

3.11.10. All bunds and hardstanding areas shall be visually checked weekly for structural soundness and cracking/damage.

3.12. Silt Traps and Oil Separators/Interceptors

3.12.1. The licensee shall install and maintain silt traps and oil interceptors at the facility to ensure that all yard surface water discharges from the facility pass through a silt trap and oil interceptor prior to discharge. The interceptors shall be a Class I full retention interceptor and the silt traps and interceptors shall be in accordance with European Standard prEN 858 (installations for the separation of light liquids).

3.13. Drainage system, pipeline testing

3.13.1. Prior to the commencement of waste activities all foul sewer gullies, drainage grids and manhole covers shall be painted with red squares whilst all surface water discharge gullies, drainage grids and manhole covers shall be painted with blue triangles. These colour codes shall be maintained so as to be visible at all times during facility operation, and any identification designated in this licence (e.g. SW1) shall be inscribed on these manholes.

3.13.2. The drainage system, bunds, silt traps and oil separators shall be inspected weekly, desludged as necessary and properly maintained at all times. All sludge and drainage from these operations shall be collected for safe disposal. A written record shall be kept of the inspections, desludging, cleaning, disposal of associated waste products, maintenance and performance of the interceptors, bunds and drains.

3.13.3. The integrity and water tightness of all underground pipes and tanks and their resistance to penetration by water or other materials carried or stored therein shall be tested and demonstrated by the licensee and shall be reported to the Agency following their installation and prior to their use. This testing shall be carried out by the licensee at least once every three years thereafter and reported to the Agency on each occasion. A written record of all integrity tests and any maintenance or remedial work arising from them shall be maintained by the licensee.

3.14 Waste Water Collection System/Surface Water Management

3.14.1 Wastewater shall drain to a $5m^3$ self-contained monitoring tank prior to discharge. Wastewater shall only be discharged to the South Dublin County Council sewer (via the Greenogue Industrial Estate Sewer) as per Drawing No. 569-42-106 following confirmation that the discharge meets the requirements of *Schedule C.3: Emission Limits for Foul Water Emissions to Sewer.* Wastewater shall be discharged on a batch basis.

3.14.2 Run-off from all areas not used for the handling and storage of waste shall be discharged to the stormwater sewer via a Class 1 oil interceptor as per Drawing No. 569-42-106.

3.15 Monitoring Infrastructure

3.15.1 Groundwater

Within six months from the date of grant of this licence, the licensee shall install representative groundwater monitoring points, at locations to be agreed by the Agency, to allow for the sampling and analyses of groundwater.

3.15.2 Replacement of Infrastructure

Monitoring infrastructure which is damaged or proves to be unsuitable for its purpose shall be replaced within three months of it being damaged or recognised as being unsuitable.

REASON: *To provide appropriate infrastructure for the protection of the environment.*

CONDITION 4 RESTORATION AND AFTERCARE

4.1. A proposal for a Decommissioning and Aftercare Plan for the facility shall be submitted to the Agency within twelve months of the date of grant of this licence. Such a plan shall be in agreement with the requirement to provide financial provision as per Condition 12.2 of this licence. The licensee shall update these plans when required by the Agency.

REASON: *To provide for the restoration of the facility.*

CONDITION 5 FACILITY OPERATIONS

5.1 Hazardous wastes that are accepted at the facility as per *Schedule A: Waste Acceptance* and fuels shall only be stored at appropriately bunded locations on the facility.

5.2 All waste processing shall be carried out inside the waste transfer building.

5.3 Waste Acceptance and Characterisation Procedures

5.3.1 Prior to commencement of waste acceptance at the facility, the licensee establish and maintain detailed written procedures for the acceptance, handling and sampling of all incoming wastes to include analysis, weighing, documentation, transfer, storage and record keeping.

5.3.2 No hazardous waste may be accepted at the facility unless:

a) The licensee has been notified in advance of the types of waste (including EWC Codes) and the date of delivery;

b) The waste is appropriately labelled using the relevant EWC Codes;

c) An effective procedure for accepting and handling the waste is in place and satisfactory staff training in the implementation of that procedure has been undertaken;

d) The waste has been classified in accordance with the UN publication *'Recommendations on the Transport of Hazardous Goods: Model Regulations', thirteenth revised edition, United Nations, 2003* and fully characterised and, where necessary and particularly in the case of new customers or waste types, its characteristics and hazardous properties confirmed by the licensee by sampling and analysis in advance and upon arrival at the facility;

e) A suitable designated storage area is immediately available at the facility; and

f) A designated waste quarantine area is immediately available at the facility for any waste which does not conform with the pre-notification and which cannot be otherwise accepted at the facility.

5.3.3 Waste arriving at the facility shall be inspected at the point of entry to the facility and subject to this inspection, weighed, documented and directed to the Waste Transfer Building. Each load of waste arriving at the Waste Transfer Building shall be inspected upon tipping within this building. Only after such inspections shall the waste be processed for disposal or recovery.

5.3.4 A record of all inspections of incoming waste loads shall be maintained.

5.3.5 Waste shall be accepted at the facility only from known customers or new customers subject to initial waste profiling and waste characterisation off-site. The written records of this off-site waste profiling and characterisation shall be retained by the licensee for all active customers and for a two year period following termination of licensee/customer agreements. There shall be no casual public access to the facility.

5.3.6 Prior to the acceptance of any waste at the facility, the licensee shall submit a site-specific tracking system to cater for all materials being accepted at the facility to the Agency for its agreement. Any modifications to the tracking system shall be notified to the Agency.

5.4 Storage of Waste

5.4.1 Waste accepted at the facility shall only be stored in the designated storage areas.

5.4.2 Unless otherwise agreed by the Agency waste shall be stored inside the warehouse building.

5.4.3 Any waste deemed unsuitable for processing at the facility and/or in contravention of this licence shall be immediately separated and removed from the facility at the earliest possible time. Temporary storage of such wastes shall be in a designated Waste Quarantine Area. Waste shall be stored under appropriate conditions in the quarantine area to avoid putrefaction, odour generation, the attraction of vermin and any other nuisance or objectionable condition.

5.4.4 The licensee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive wastes. The waste shall be separated and protected from sources of ignition or reaction including but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical or mechanical), spontaneous ignition (e.g. heat-producing chemical reactions) and radiant heat.

5.5 Labelling of containers, drums and tanks.

5.5.1 No container (including drums and tanks) shall be accepted at the facility whose contents are unknown and whose contents are not clearly displayed on a label.

5.5.2 All containers, including waste and fuel storage drums and tanks, shall be labelled to clearly indicate their contents. During storage, each container shall be accessible and allow for the reading of the label.

5.5.3 All hazardous waste containers shall be uniquely marked with an identification code using indelible or other permanent or electronic markings. All containers shall be marked or labelled to clearly indicate their contents. All previous markings and labels shall be defaced or crossed out but shall remain legible.

5.6 Operational Controls

5.6.1 The floor of the waste transfer building shall be washed down and cleared of all waste at the end of the working day. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied.

5.6.2 Scavenging shall not be permitted at the facility.

5.6.3 Gates shall be locked shut when the facility is unsupervised.

5.6.4 The licensee shall provide and use adequate lighting during the operation of the facility in hours of darkness.

5.6.5 No smoking shall be allowed on the facility.

5.7 Asbestos Waste

5.7.1 The transfer station shall be used for the temporary storage of asbestos waste prior to its removal for final disposal.

5.7.2 The licensee shall ensure that during transport, handling and storage of waste containing asbestos fibres or dust that no such fibres or dust is emitted or released to any environmental medium.

5.7.3 Asbestos waste shall only be accepted at the facility in sealed containers, owned and controlled by the licensee, that have been previously delivered to the customer, unless otherwise agreed by the Agency.

5.7.4 Before acceptance of asbestos waste in the containers referred to in Condition 5.7.3, all fibrous asbestos waste and dust shall have been enclosed in sealed plastic bags, double wrapped, of a minimum thickness of 1,000 gauge, or other sealed containers as approved in advance by the Health and Safety Authority (H.S.A).

5.7.5 No unwrapped asbestos waste shall be accepted or stored at the facility. Care shall be taken in handling the waste that no damage is caused to any plastic bags or wrapping as may permit the escape of fibres and dust. Any damage shall be recorded as an incident. In addition, no unwrapping of asbestos waste shall be carried out.

5.7.6 Asbestos waste shall be placed in lockable transport containers immediately on arrival at the facility, or into dedicated buildings/structures for temporary storage. Containers and any dedicated buildings shall remain locked at all times when asbestos waste is not being placed in them. No asbestos waste shall be deposited or allowed to accumulate outside the containers or buildings being used for waste storage. Containers used to store asbestos waste shall not be used for any other purpose.

5.7.7 All containers used to store or transport asbestos waste before onward transport shall be of a design suitable for washing and cleansing without lodgement or escape of debris or fibres. The design should also ensure maximum protection from accidental or deliberate damage.

5.7.8 Appropriate warning labels shall be displayed on containers so that persons using the facility are aware of its hazards. All full containers shall be sealed and clearly labelled and shall only be stored in an agreed location.

5.7.9 At least one month prior to the commencement of the acceptance of asbestos waste at the facility the licensee shall undertake asbestos fibre monitoring at two locations to be agreed by the Agency. Thereafter, the licensee shall undertake asbestos fibre monitoring on a quarterly basis as specified in *Schedule D: Monitoring*, of this licence.

5.7.10 Copies of the results of any asbestos fibre monitoring carried out for health and safety reasons shall be submitted to the Agency within 10 days of such results becoming available to the licensee.

5.7.11 Detailed operational procedures on the handling, storage and monitoring of asbestos waste shall be submitted to the Agency at least two months prior to the commencement of acceptance of asbestos waste at the facility.

5.8 Waste Retention Time

Unless otherwise agreed by the Agency:

5.8.1 No waste shall have a retention time in the waste transfer station in excess of six months.

5.8.2 Asbestos waste shall be removed as soon as operationally possible and, in any case, at no later date than three monthly intervals.

5.9 Waste and Chemical Storage Plan

5.9.1 Within two months from the date of grant of the licence, a waste and chemical storage plan shall be established and maintained. The plan may be paper based or electronic.

5.9.2 The waste storage plan shall illustrate the location, identification code, volume and content of all waste containers held at the facility. The chemical storage plan shall

illustrate the location, volume and content of all chemical containers whose volume exceeds 25 litres held at the facility.

5.9.3 The waste and chemical storage plan shall be updated daily by the end of each working day and shall be verified as updated by an authorised person or a nominated deputy as identified under Condition 2.1.1.

5.10 Compatibility of Wastes

5.10.1 The compatibility of wastes to be bulked-up shall be established prior to such bulking-up taking place. The procedures to be in place under Condition 5.3.2 (b) shall consider any compatibility testing that may be required, including, as far as is possible, the identification of any potentially abnormal or unusual situations.

5.10.2 A detailed procedure for the carrying out of compatibility tests shall be submitted for agreement by the Agency prior to the commencement of any bulking-up activities.

5.10.3 Records shall be maintained of all compatibility tests carried out.

5.11 Waste Electrical and Electronic Equipment (WEEE)

5.11.1 No dismantling of WEEE shall commence without prior approval from the Agency. A proposal including details of SEW, process capacity and throughputs, information on emissions or potential emissions, abatement measures, contingency and storage arrangements shall be submitted for agreement by the Agency.

5.11.2 Detailed procedures shall be submitted to the Agency for its agreement prior to the commencement of this activity.

5.12 Waste Repackaging

5.12.1 All containers accepted at the facility shall be whole and sound. Any leaking or otherwise ruptured drums or containers shall immediately be overdrummed or the contents transferred to a sound container in a manner which will not adversely affect the environment. This activity shall only be carried out in bunded areas such that any spillage arising from the activity may be contained and collected.

5.12.2 All operations involving the transfer of contents referred to in Condition 5.12.1 shall take place indoors protected against spillage. Appropriate control measures shall be put in place to minimise any emissions which may arise from such activity.

5.13 Refrigerator Processing

5.13.1 No refrigerator processing shall be carried out on-site without prior approval from the Agency.

5.13.2 At least two months prior to the commencement of commissioning of the refrigerator processing plant, SEW and an operational proposal must be submitted to the Agency for its approval, details of the following must be incorporated into the proposal:

a) Precise process details;

b) Air emissions;

c) Noise emissions;

d) Controls methods used to prevent any potential emissions;

e) Precise details of end products of process;

f) Process flow diagram; and

g) A proposed monitoring programme.

5.13.3 A noise prediction model shall be submitted to the Agency as part of the proposal to install and operate the refrigerator processing plant.

5.13.4 An air emissions model shall be submitted to the Agency as part of the proposal to install and operate the refrigerator processing plant.

5.13.5 The operation of the refrigerator processing plant shall be in accordance with the standards stipulated in '*Guidance on the Recovery and Disposal of Controlled Substances in Refrigerators and Freezers*': Environment Agency; Scottish Environment Protection Agency (2002), or any other standard as instructed by the Agency.

5.13.6 Monitoring locations, frequency of monitoring, emission limit values, methods of analysis and monitoring parameters shall be agreed in advance by the Agency prior to the operation of the plant.

5.14 Repackaging/Bulking-up Compartment

5.14.1 The repackaging/bulking-up compartment shall not operate without prior approval from the Agency.

5.14.2 Details of the repackaging/bulking-up compartment for liquids must be agreed in advance by the Agency by way of SEW. The proposal must include the following as a minimum:

a) Bunding arrangements;

b) Drainage arrangements;

c) Air emissions;

d) Noise emissions;

e) Process control equipment;

f) Back-up, maintenance and calibration requirements;

g) Abatement equipment;

h) Periods of emission;

i) Volumes to be emitted; and

j) Stack characteristics including vent diameter and height above ground level.

5.14.3 A noise prediction model shall be submitted to the Agency as part of the proposal to install and operate the repackaging/bulking-up compartment.

5.14.4 An air emissions model shall be submitted to the Agency as part of the proposal to install and operate the repackaging/bulking-up compartment.

5.14.5 All activities conducted in the bulking-up compartment will be conducted under negative air pressure with dust filtration as a minimum.

5.14.6 The repackaging/bulking-up compartment will be designed in accordance with the principles outlined in the Safe Use & Handling of Flammable Liquids (HSE publication) or any other such publication/standard as instructed by the Agency.

5.14.7 Monitoring locations, frequency of monitoring, emission limit values, methods of analysis and monitoring parameters shall be agreed in advance by the Agency prior to the operation of the plant.

5.15 Healthcare Waste

5.15.1 Healthcare waste from hospitals or similar institutions shall not be accepted at the facility.

5.15.2 Unless otherwise agreed by the Agency, healthcare risk waste shall be removed off-site within 48 hours of its arrival on-site.

5.15.3 Infectious health care waste acceptable at the facility shall be restricted to wastes arising from health and welfare services provided to staff at their place of work.

5.15.4 Waste types accepted shall be restricted to those detailed in SOPG 025 *Acceptance of Infectious Healthcare Waste*, (Article 14 response), and agreed in advance by the Agency.

5.15.5 Detailed waste acceptance and handling procedures, agreed by the Agency, shall be in place prior to acceptance of waste on-site.

5.15.6 Procedures for the spillage of infectious healthcare waste shall be in place prior to the acceptance of the waste type on-site, procedures must take account of Condition 5.15.4.

5.15.7 Subject to Condition 6.7.8, all spillages of healthcare waste shall be cleaned up so as to prevent spilled fluid draining to sewer and in any case so as not to adversely affect the environment.

5.15.8 A designated, separate and secure storage area shall be utilised for the storage of all healthcare waste.

5.16 Off-site Disposal and Recovery

5.16.1 Waste sent off-site for recovery or disposal shall be conveyed only by an authorised contractor.

5.16.2 All waste transferred from the facility shall be transferred only to an appropriately authorised facility.

5.16.3 All wastes removed off-site for recovery or disposal shall be transported from the facility to the consignee in a manner which will not adversely affect the environment.

5.17 Maintenance

5.17.1 All treatment/abatement and emission control equipment shall be calibrated and maintained, in accordance with the instructions issued by the manufacturer/supplier or installer. Written records of the calibrations and maintenance shall be made and kept by the licensee.

5.17.2 The licensee shall maintain and clearly label and name all sampling and monitoring locations.

5.17.3 The baler and shredder equipment shall be maintained in accordance with the manufacturers instructions.

***REASON**: To provide for appropriate operation of the facility to ensure protection of the environment.*

CONDITION 6 EMISSIONS

6.1. No specified emission from the facility shall exceed the emission limit values set out in *Schedule C: Emission Limits* of this licence. There shall be no other emissions of environmental significance.

6.2. The licensee shall ensure that the activities shall be carried out in a manner such that emissions do not result in significant impairment of, or significant interference with the environment beyond the facility boundary.

6.3. Emission limits for emissions to atmosphere in this licence shall be interpreted in the following way.

6.3.1. Non-Continuous Monitoring

(i) For any parameter where, due to sampling/analytical limitations, a 30 minute sample is inappropriate, a suitable sampling period should be employed and the value obtained therein shall not exceed the emission limit value.

(ii) For all other parameters, no 30 minute mean value shall exceed the emission limit value.

(iii) For flow, no hourly or daily mean value shall exceed the emission limit value.

6.4. There shall be no direct emissions to groundwater.

6.5. There shall be no clearly audible tonal component or impulsive component in the noise emissions from the activity at the noise sensitive locations.

6.6. Disposal of Foul Water

6.6.1. No foul water shall be discharged to surface water.

6.7. Emissions to Sewer

6.7.1. No specified discharge or emission to sewer shall exceed the emission limit value set out in *Schedule C: Emissions Limits for Foul Water Emissions to Sewer*. There shall be no other discharge or emission to sewer of environmental significance.

6.7.2. Monitoring and analysis of each discharge or emission to sewer shall be carried out as specified in *D.5: Foul Water Emissions.*

6.7.3. Monitoring and analytical equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge or emission.

6.7.4. No substance shall be present in emissions to sewer in such concentrations as would constitute a danger to sewer maintenance personnel working in the sewerage system, or as would be damaging to the fabric of the sewer, or as would interfere with the biological functioning of a downstream wastewater treatment works.

6.7.5. The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus

installed, in connection with the discharge or emission, and to take samples of the discharge or emission.

6.7.6. No discharge or emission to sewer shall take place which might give rise to any reaction within the sewer or to the liberation of by-products which may be of environmental significance.

6.7.7. The licensee shall ensure that the discharge shall not contain dissolved methane, petroleum spirits or organic solvents (including chlorinated organic solvents), at concentrations which would give rise to flammable or explosive vapours in the sewer.

6.7.8. Non-trade effluent wastewater (e.g. firewater, accidental spillage) which occurs on-site shall not be discharged to the sewer without the prior authorisation of the Sanitary Authority.

6.7.9. The licensee shall provide and maintain an inspection chamber in a suitable position in connection with each pipe through which a discharge or emission is being made. Each such inspection chamber or manhole shall be constructed and maintained by the licensee so as to permit the taking of samples of the discharge.

6.7.10. The licensee shall submit monitoring results to the Sanitary Authority on an annual basis.

6.7.11. The trade effluent shall be screened prior to discharge to remove gross solids and avoid blockages to sewer.

6.7.12. Material classified as 'hazardous waste' under the Waste Management Act, 1996, shall not be discharged to sewer.

6.7.13. The licensee shall provide a means of measuring the volumes of trade effluent discharged to foul sewer. These volumes shall be submitted to the Sanitary Authority on a quarterly basis.

6.8. Emission limit values for foul water emissions to sewer in this licence shall be interpreted in the following way:-

a) Continuous monitoring.

No flow value shall exceed the specified limit.

b) Non-Continuous monitoring.

Eight out of ten consecutive results, calculated as daily mean concentration or mass emission values on the basis of flow proportional composite sampling shall not exceed 1.2 times the emission limit value.

c) No grab sample shall exceed 1.2 times the emission limit value.

REASON: *To control emissions from the facility and provide for the protection of the environment.*

CONDITION 7 NUISANCE CONTROL

7.1 The licensee shall ensure that vermin, birds, flies, mud, dust, litter, noise and odours do not give rise to nuisance at the facility or in the immediate area of the facility. Any method used by the licensee to control any such nuisance shall not cause environmental pollution.

7.2 The road network in the vicinity of the facility shall be kept free from any debris caused by vehicles entering or leaving the facility. Any such debris or deposited materials shall be removed without delay.

7.3 Litter Control

7.3.1 All loose litter or other waste, placed on or in the vicinity of the facility, other than in accordance with the requirements of this licences, shall be removed, subject to the agreement of the landowners, immediately and in any event by 10.00am of the next working day after such waste is discovered.

7.3.2 The licensee shall ensure that all vehicles delivering waste to and removing waste and materials from the facility are appropriately covered.

7.4 Dust/Odour Control

7.4.1 All non-hazardous waste for disposal stored overnight at the facility, shall be stored in suitably covered and enclosed containers within the Waste Transfer Building, and shall be removed from the facility within forty eight hours of its arrival at the facility.

7.4.2 Prior to the date of commencement of the waste activities at the facility, the licensee shall install and provide adequate measures for the control of odours and dust emissions, including fugitive dust emissions, from the facility. Such measures shall at a minimum include the following:-

7.4.2.1 Dust curtains shall be maintained on the entry/exit points from the waste transfer building, all other doors in this building shall be kept closed where possible.

7.4.2.2 Provision of 100% duty capacity and 25% stand by capacity, back ups and spares must be provided for the air handling, ventilation and abatement plant.

7.4.3 Within 3 months of the date of grant of the licence submit an odour management plan to the Agency for its approval to include the following; detailed measures taken to prevent odour escaping off-site from the handling of sewage sludge; the feasibility of the installation of a negative air pressure system throughout the building to ensure no significant escape of odours or dust; details of installation of a odour management system.

REASON: *To provide for the control of nuisances.*

CONDITION 8 MONITORING

8.1. The licensee shall carry out such monitoring and at such locations and frequencies as set out in *Schedule D: Monitoring* of this licence. Unless otherwise specified by this licence, all environmental monitoring shall commence no later than two months after the date of grant of this licence.

8.2. The licensee shall amend the frequency, locations, methods and scope of monitoring as required by this licence only upon the written instruction of the Agency and shall provide such information concerning such amendments as may be requested in writing by the Agency. Such alterations shall be carried out within any timescale nominated by the Agency.

8.3. Monitoring and analysis equipment shall be operated and maintained in accordance with the manufacturers' instructions (if any) so that all monitoring results accurately reflect any emission, discharge or environmental parameter.

8.4. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and to off-site points as required by the Agency.

8.5. The licensee shall maintain all sampling and monitoring points, and clearly label and name all sampling and monitoring locations, so that they may be used for representative sampling and monitoring.

8.6. The licensee shall install on all emission points such sampling points or equipment, including any data-logging or other electronic communication equipment, as may be required by the Agency. All such equipment shall be consistent with the safe operation of all sampling and monitoring systems.

8.7. Within one month of the date of grant of this licence, the licensee shall maintain on-site a register of the names, qualifications and a summary of relevant experience of all persons that will carry out all sampling and monitoring as required by this licence and who carry out the interpretation of the results of such sampling and monitoring.

8.8. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity is being carried on, unless alternative sampling or monitoring has been agreed, in writing, by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternative sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.

8.9. Nuisance Monitoring

8.9.1. The licensee shall, at a minimum of one week intervals, inspect the facility and its immediate surrounds for nuisances caused by litter, vermin, birds, flies, mud, dust, noise and odours.

REASON: *To ensure compliance with the conditions of this licence by provision of a satisfactory system of monitoring of emissions.*

CONDITION 9 CONTINGENCY ARRANGEMENTS

9.1. In the event of an incident the licensee shall immediately:-

a) identify the date, time and place of the incident;

b) carry out an immediate investigation to identify the nature, source and cause of the incident and any emission arising therefrom;

c) isolate the source of any such emission;

d) evaluate the environmental pollution, if any, caused by the incident;

e) identify and execute measures to minimise the emissions/malfunction and the effects thereof;

f) provide a proposal to the Agency for its agreement within one month of the incident occurring to:-

i) identify and put in place measures to avoid reoccurrence of the incident; and

ii) identify and put in place any other appropriate remedial action.

9.2. The licensee shall, within two months of the date of grant of this licence, submit a written Emergency Response Procedure (ERP) to the Agency for its agreement. The ERP shall address any emergency situations which may originate on the facility and shall include provision for minimising the effects of any emergency on the environment. This shall include a risk assessment to determine the requirements at the facility for fire fighting and fire water retention facilities. The Fire Authority shall be consulted by the licensee during this assessment.

9.3. The licensee shall have in storage an adequate supply of containment booms and/or suitable absorbent material to contain and absorb any spillage at the facility. Once used the absorbent material shall be disposed of at an appropriate facility.

9.4. Emergencies

9.4.1. In the event of a complete breakdown of equipment or any other occurrence which results in the closure of the transfer station building, any waste arriving at or already collected at the facility shall be transferred directly to appropriate landfill sites or any other appropriate facility until such time as the transfer station building is returned to a fully operational status. Such a breakdown event will be treated as an emergency and rectified as soon as possible.

9.4.2. All significant spillages occurring at the facility shall be treated as an emergency and immediately cleaned up and dealt with so as to alleviate their effects.

9.4.3. No waste shall be burnt within the boundaries of the facility. A fire at the facility shall be treated as an emergency and immediate action shall be taken to extinguish it and notify the appropriate authorities.

***REASON**: To ensure compliance with the conditions of this licence by provision of a satisfactory system of monitoring of emissions.*

CONDITION 10 RECORDS

10.1 The licensee shall keep the following documents at the facility office:-

a) the current waste licence relating to the facility;

b) the current EMS for the facility;

c) the previous year's AER for the facility; and

d) all written procedures produced by the licensee which relate to the licensed activities.

10.2 The licensee shall maintain a written record for each load of waste arriving at and departing from the facility. The licensee shall record the following:-

a) the date;

b) the name of the carrier (including if appropriate, the waste carrier registration details);

c) the vehicle registration number;

d) the name of the producer(s)/collector(s) of the waste as appropriate;

e) the name of the waste facility (if appropriate) from which the load originated including the waste licence or waste permit register number;

f) the method used to process/sort the waste at the facility;

g) a description of the waste including the associated EWC codes;

h) the quantity of the waste, recorded in tonnes;

i) the name of the person checking the load;

j) where loads or wastes are removed or rejected, details of the date of occurrence, the types of waste and the facility to which they were removed;

k) where applicable a consignment note number (including transfrontier shipment notification and movement/tracking form numbers, as appropriate);

l) written confirmation that the consigned waste has reached its destination and/or has been subjected to the recovery/disposal process for which it was destined, as appropriate; and

m) TFS documentation as appropriate.

10.3 Written Records

The following written records shall be maintained by the licensee:-

a) the types and quantities of waste recovered at the facility each year. These records shall include the relevant EWC Codes;

b) all training undertaken by facility staff;

c) results from all integrity tests of bunds and other structures and any maintenance or remedial work arising from them;

d) details of all nuisance inspections; and

e) the names and qualifications of all persons who carry out all sampling and monitoring as required by this licence and who carry out the interpretation of the results of such sampling and monitoring.

10.4 The licensee shall maintain a written record of all complaints relating to the operation of the activity. Each such record shall give details of the following:-

a) date and time of the complaint;

b) the name of the complainant;

c) details of the nature of the complaint;

d) actions taken on foot of the complaint and the results of such actions; and,

e) the response made to each complainant.

10.5 A written record shall be kept of each consignment of foul water removed from the facility. The record shall include the following:-

a) the name of the carrier;

b) the date and time of removal of foul water from the facility;

c) the volume of foul water, in cubic metres, removed from the facility on each occasion;

d) the name and address of the Waste Water Treatment Plant to which the foul water was transported; and

e) any incidents or spillages of foul water during its removal or transportation.

10.6 A written record shall be kept at the facility of the programme for the control and eradication of vermin and fly infestations at the facility. These records shall include as a minimum the following:-

a) the date and time during which spraying of insecticide is carried out;

b) contractor details;

c) contractor logs and site inspection reports;

d) details of the rodenticide(s) and insecticide(s) used;

e) operator training details;

f) details of any infestations;

g) mode, frequency, location and quantity of application; and,

h) measures to contain sprays within the facility boundary.

REASON: *To provide for the keeping of proper records of the operation of the facility.*

CONDITION 11 REPORTS AND NOTIFICATIONS

11.1 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in:

a) A material change or increase in:

- The nature or quantity of any emission;
- The abatement/treatment or recovery systems;
- The range of processes to be carried out;
- The fuels, raw materials, products or wastes to be generated or accepted, or

b) Any changes in:

- The site management and control with adverse environmental significance,

shall be carried out or commenced without prior notice to, and without the prior written agreement of, the Agency.

11.2 Unless otherwise agreed by the Agency, all reports and notifications submitted to the Agency shall:-

a) be sent to the Environmental Protection Agency, Regional Inspectorate, Richview, Clonskeagh Road, Dublin 14;

b) comprise one original and two copies unless additional copies are required;

c) be formatted in accordance with any written instruction or guidance issued by the Agency;

d) include whatever information as is specified in writing by the Agency;

e) be identified by a unique code, indicate any modification or amendment, and be correctly dated to reflect any such modification or amendment;

f) be submitted in accordance to the relevant reporting frequencies specified by this licence, such as in *Schedule E: Recording and Reporting to the Agency* of this licence;

g) be accompanied by a written interpretation setting out their significance in the case of all monitoring data; and

h) be transferred electronically to the Agency's computer system if required by the Agency.

11.3 In the event of an incident occurring on the facility, the licensee shall:-

a) notify the Agency as soon as practicable and in any case not later than 10.00 am the following working day after the occurrence of any incident;

b) submit a written record of the incident, including all aspects described in Condition 9.1(a-e), to the Agency as soon as practicable and in any case within five working days after the occurrence of any incident;

c) in the event of any incident which relates to discharges to surface/sewer water, notify South Dublin County Council, Sanitary Authority as soon as practicable and in any case not later than 10:00am on the following working day after such an incident; and

d) Should any further actions be taken as a result of an incident occurring, the licensee shall forward a written report of those actions to the Agency as soon as practicable and no later than ten days after the initiation of those actions.

11.4 Waste Recovery Reports

Within nine months of the date of grant of this licence, a report examining waste recovery options shall be prepared and included in the AER. This report shall address methods to contribute to the achievement of the recovery targets stated in national and European Union waste policies and shall include the following:-

a) proposals for the contribution of the facility to the achievement of targets for the reduction of biodegradable waste to landfill as specified in the Landfill Directive;

b) the separation of recyclable materials from the waste;

c) the recovery of Construction and Demolition Waste;

d) the recovery of metal waste and white goods including written procedures for the de-gassing of CFC's from refrigerators;

e) the recovery of commercial waste, including cardboard;

f) inert waste to be used for cover/restoration material at the facility; and

g) the recovery of all hazardous waste.

11.5 Monitoring Locations

11.5.1. Within three months of the date of grant of this licence, the licensee shall prepare for inclusion in the AER, an appropriately scaled drawing(s) showing all the monitoring locations that are stipulated in this licence. The drawing(s) shall include the reference code of each monitoring point.

11.6 Annual Environmental Report

11.6.1 The licensee shall submit to the Agency for its agreement, by 31st March each year an Annual Environmental Report (AER).

11.6.2 The AER shall include as a minimum the information specified in *Schedule F: Content of Annual Environmental Report* and shall be prepared in accordance with any relevant written guidance issued by the Agency.

REASON: *To provide for proper reporting and notification of the Agency.*

CONDITION 12 CHARGES AND FINANCIAL PROVISIONS

12.1 Agency Charges

12.1.1 The licensee shall pay to the Agency an annual contribution of € 18,162.50 or such sum as the Agency from time to time determines, towards the cost of monitoring the activity or otherwise in performing any functions in relation to the activity, as the Agency considers necessary for the performance of its functions under the Waste Management Act 1996. The licensee shall in 2005 and subsequent years, not later than January 31 of each year, pay to the Agency this amount updated in accordance with changes in the Public Sector Average Earnings Index from the date of the licence to the renewal date. The updated amount shall be notified to the licensee by the Agency. For 2004, the licensee shall pay a pro rata amount from the date of this licence to 31st December. This amount shall be paid to the Agency within one month of the date of grant of this licence.

12.1.2 In the event that the frequency or extent of monitoring or other functions carried out by the Agency needs to be increased the licensee shall contribute such sums as determined by the Agency to defraying its costs in regard to items not covered by the said annual contribution.

12.2 Financial Provision for Closure, Restoration and Aftercare

12.2.1 The licensee shall arrange for the completion of a comprehensive and fully costed Environmental Liabilities Risk Assessment for the facility which will address liabilities arising from the carrying on of the activities to which this licence relates. A report on this assessment shall be submitted to the Agency for its agreement within six months of date of grant of this licence.

12.2.2 Within nine months of the date of grant of this licence, the licensee shall make a Proposal for Financial Provision to the Agency for its agreement to cover any liabilities incurred by the licensee in carrying on the activities to which this licence relates. Such provision shall be maintained by the licensee unless otherwise agreed by the Agency.

12.2.3 The amount of financial provision, held under Condition 12.2.2 shall be reviewed and revised as necessary, but at least annually. Any proposal for such a revision shall be submitted to the Agency for its agreement.

12.2.4 The licensee shall within two weeks of purchase, renewal or revision of the financial provision required under Condition 12.2.2, forward to the Agency written proof of such indemnity.

12.2.5 Unless otherwise agreed any revision to the fund shall be computed using the following formula:

Cost = (ECOST x WPI) + CiCC

Where:

Cost = Revised restoration and aftercare cost.

ECOST = Existing restoration and aftercare cost.

WPI = Appropriate Wholesale Price Index [Capital Goods, Building & Construction (i.e. Materials & Wages) Index], as published by the Central Statistics Office, for the year since last closure calculation/revision.

CiCC = Change in compliance costs as a result of change in site conditions, changes in law, regulations, regulatory authority charges, or other significant changes.

WPI = Appropriate Wholesale Price Index [Capital Goods, Building & Construction (i.e. Materials & Wages) Index], as published by the Central Statistics Office, for the year since last closure calculation/revision.

CiCC = Change in compliance costs as a result of change in site conditions, changes in law, regulations, regulatory authority charges, or other significant changes.

12.3 Sanitary Authority Charges.

12.3.1 The licensee shall pay to the Sanitary Authority a quarterly charge of €1.60 per cubic metre of trade effluent discharged to the foul sewer or such sum as may be determined from time to time, having regard to the variations in the cost of providing drainage and the variation in effluent reception and treatment costs. This amount shall be paid to the Sanitary Authority within one month of the date of grant of this licence and quarterly thereafter within one month of the date of notification by the Sanitary Authority of the updated quarterly amount.

12.3.2 The licensee shall pay to the Sanitary Authority an annual charge of €1,620 or such sum as may be determined from time to time, towards the cost of monitoring the discharge of trade effluent. This amount shall be paid to the Sanitary Authority within one month of the date of grant of this licence and annually thereafter within one month of the date of of notification by the Sanitary Authority of the updated annual amount.

REASON: *To provide for adequate financing for monitoring and financial provisions for measures to protect the environment.*

SCHEDULE A : Waste Acceptance

A.1 Waste Acceptance

Table A.1 Waste Categories and Quantities

WASTE TYPE [Note 1]	MAXIMUM (TONNES PER ANNUM) [Note 2]
Household Waste	7,000
Sewage Sludge	2,000
Construction and Demolition Waste	1,000
Industrial Sludge	2,000
Commercial and Industrial Waste-	15,000
Hazardous Waste as listed in Table E.2.2 entitled *'Hazardous waste Types and Quantities'* of the application.	33,000
TOTAL	60,000

Note 1 Other waste types compatible with the facility operation may be accepted subject to prior written agreement by the Agency.
Note 2 There shall be no increase or variation in any of the waste types accepted without prior written agreement by the Agency.

SCHEDULE B : Specified Engineering Works

Specified Engineering Works
Installation of silt traps and oil interceptors.
Installation of dust/odour system.
Installation of waste handling, processing, recycling/recovery infrastructure and installation of increased waste processing capacity.
Installation of emissions abatement equipment.
Installation of sumps, bunds or other drainage controls.
Installation of refrigerator reprocessing equipment.
Installation of bulking-up compartment.
Any other works notified in writing by the Agency.

SCHEDULE C : Emission Limits

C.1 Noise Emissions: (Measured at the monitoring points indicated in *Table D.1.1*).

Day dB(A) L_{Aeq}(30 minutes)	Night dB(A) L_{Aeq}(30 minutes)
55	45

C.2 Dust Deposition Limits: (Measured at the monitoring points indicated in *Table D.1.1*).

Level (mg/m^2 /day)[Note 1]
350

Note 1: 30 day composite sample with the results expressed as mg/m^2/day.

C.3 Emission Limits for Foul Water Emissions to Sewer

Emission Point Reference No. TfFW1

Volume to be emitted: [Note 1] Maximum in any one day: 5 m^3

Maximum rate per hour: 2 m^3/hr

Parameter	Emission Limit Value		
	Grab Sample (mg/l)	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD	3000	2000	10
COD	6000	4000	20
Ammoniacal Nitrogen N (NH_4-N)	100	70	0.35
Suspended solids	1500	1000	5
Sulphates (as SO_4)	1000	1000	5
pH	6-10	6-10	
Temperature	42°C	42°C	
Detergents (as MBAS)	100	100	0.5
Fats, Oils, Grease	100	100	0.5
Phosphates (as PO4-P)	100	100	0.5

Note 1: Subject to compliance with Condition 6.7.8

C.4 Emissions to Atmosphere

Emission Point Reference No. Tf A1

Parameter	Emission Limit Value
Total Particulates	20 mg/m^3
T. A. Luft Organics General	50mg/m^3 (as total carbon) (mass flow ≥ 0.5 kg/h)

SCHEDULE D : Monitoring

Monitoring to be carried out as specified below.

D.1 Monitoring Locations

Monitoring locations shall be those as set out in Table D.1.1.

Table D.1.1 Monitoring Locations

Noise	Sewer Emission Point	Groundwater	Surface water	Dust	Air Emission Point
Stations Note 1	Stations Note 1	Stations	Stations Note 1	Stations Note 3	Stations Note 1
Tf N1	TfFW1	Note 2	Tf SW1	D1	Tf A1
Tf N2				D2	
Tf N3				D3	
				D4	

Note 1: Locations as per Drawing No. 569-42-108 *'Locations of Environmental Monitoring Points'*.
Note 2: Locations to be agreed with the Agency in accordance with Condition 3.15.1.
Note 3: Locations as per Figure 5.3 of Volume 2 of EIS.

D.2 Dust

Table D.2.1 Dust Monitoring Frequency and Technique

Parameter (mg/m^2/day)	Monitoring Frequency	Analysis Method/Technique
Dust	Three times a year Note 2	Standard Method Note 1

Note 1: Standard method VDI2119 (Measurement of Dustfall, Determination of Dustfall using Bergerhoff Instrument (Standard Method) German Engineering Institute). A modification (not included in the standard) which 2 methoxy ethanol may be employed to eliminate interference due to algae growth in the gauge.

Note 2: Twice during the period May to September.

D.3 Noise

Table D.3.1 Noise Monitoring Frequency and Technique

Parameter	Monitoring Frequency	Analysis Method/Technique
$L(A)_{EQ}$ [30 minutes]	Annual	Standard Note 1
$L(A)_{10}$ [30 minutes]	Annual	Standard Note 1
$L(A)_{90}$ [30 minutes]	Annual	Standard Note 1
Frequency Analysis(1/3 Octave band analysis)	Annual	Standard Note 1

Note 1: "International Standards Organisation. ISO 1996. Acoustics - description and Measurement of Environmental noise. Parts 1, 2 and 3."

D.4 Stormwater Sewer Emissions

Table D.4.1 Monitoring and Frequency Technique

Parameter	Monitoring Frequency	Analysis Method/Technique
PH	Quarterly	Standard [Note 1]
COD	Quarterly	Standard [Note 1]
Conductivity	Quarterly	Standard [Note 1]

Note 1: Sampling and analytical techniques must be based on standard methods which have been demonstrated as suitable for the measurement of the target substances.

D.5 Foul water Emissions

Table D.5.1 Foul water Monitoring Frequency and Techniques

Parameter	Monitoring Frequency	Analysis Method/Technique
PH	Every Two Months	Electrometry
Biological Oxygen Demand	Every Two Months	Standard Methods [Note 1]
Suspended Solids	Every Two Months	Standard Methods [Note 1]
Fats, Oils, Grease	Every Two Months	Standard Methods [Note 1]
Temperature	Every Two Months	Temperature probe
Sulphates (as SO4)	Every Two Months	Standard Methods [Note 1]
Ammoniacal nitrogen	Every Two Months	Standard Methods [Note 1]
Phosphates (as PO4-P)	Every Two Months	Standard Methods [Note 1]
Chemical Oxygen Demand	Every Two Months	Standard Methods [Note 1]
Detergents (as MBAS)	Every Two Months	Standard Methods [Note 1]

Note 1: "Standards Methods for the Examination of Water and Wastewater", (prepared and published jointly by A.P.H.A., A.W.W.A & W.E.F) 20th Ed., American Public Health Association, 1015 Fifteenth Street, Washington DC 20005, USA.

D.6 Groundwater

Table D.6.1 Monitoring Parameters and Frequency

Parameter [Note 1]	Monitoring Frequency
Visual Inspection/Odour [Note 2]	Quarterly
Groundwater Level [Note 4]	Quarterly
Dissolved Oxygen	Quarterly
Electricaial Conductivity	Quarterly
pH [Note 4]	Quarterly
Sulphate	Quarterly
Chloride	Quarterly
Total Organic Carbon	Quarterly
List I/II Organic Substances [Note 3]	Annually
Metals	Annually

Note 1: All the analysis shall be carried out bu a competent laboratory using standard and internationally accepted procedures.
Note 2: Where there is evidence of gross contamination of groundwater, additional samples should be analysed.
Note 3: Samples screened for the presence of organic compounds using Gas Chromatography / Mas Spectrometry (GC/MS) or other appropriate techniques and using the list I/II Substances from EU Directive 76/464/EEC and 80/68/EEC as a guideline. Recommended analytical techniques include: volatiles (US Environmental Protection Agency method 524 or equivalent), semi-volatiles (US Environmental Protection Agency method 525 or equivalent), and pesticides (US Environmental Protection Agency method 608 or equivalent).
Note 4: For groundwater and surface water these parameters should be measured on-site with a portable electronic meter.

D.7 Emissions to Atmosphere

Emission Point Reference No. Tf A1

Table D.7.1 Air Monitoring Frequency and Techniques

Parameter	Monitoring Frequency	Analysis Method/Technique
Volatile Organics (T. A. Luft Class I, II and III)	Annually	Adsorption / Desorption, GCMS Note 1
ODS Note 2	Biannually	To be agreed
Particulates	Biannually	Isokinetic / Gravimetric

Note 1: Or an equivalent method acceptable to the Agency.
Note 2: To be agreed subject to Condition 5.13.

D.8 Asbestos Fibre Monitoring

Monitoring Locations: Two locations to be agreed with the Agency

Monitoring Frequency: As per Table D.8.1

Table D.8.1 Asbestos Fibre Monitoring

Parameter (fibres/ml)	Monitoring Frequency	Analysis Method/Technique
Asbestos Fibre Concentration	Quarterly Note 1	Standard Method Note 2

Note 1: Monitoring shall be performed at least one month prior to the acceptance of asbestos at the facility.

Note 2: Method used shall be 'Asbestos Fibre in Air' Health and Safety Executive MDHS 39/4, UK (1995) or another method agreed by the Agency. Monitoring shall be carried out by an independent laboratory agreed by the Agency.

SCHEDULE E : Recording and Reporting to the Agency

Recurring Reports

Report	Reporting Frequency Note1	Report Submission Date
Environmental Management System Updates	Annually	As part of the AER.
Annual Environment Report (AER)	Annually	By 31 March of each calendar year.
Record of incidents	As they occur	Within five days of the incident.
Bund, tank and container integrity assessment	Every three years	Six months from the date of grant of licence every three years thereafter as part of the AER.
Specified Engineering Works reports	As they arise	Prior to the works commencing.
Any other monitoring	As they occur	Within ten days of obtaining results.

Note 1: Unless altered at the request of the Agency

SCHEDULE F : Content of the Annual Environmental Report

Annual Environmental Report Content
Reporting Period.
Waste activities carried out at the facility.
Quantity and Composition of waste recovered, received and disposed of during the reporting period and each previous year (relevant EWC codes to be used).
Report on emissions.
Results and interpretations of environmental monitoring, including a location plan of all monitoring locations.
Resource and energy consumption summary.
Development / Infrastructural works in place and planned, to process waste quantities projected for the following year (including plant operating capacity, provision of adequate standby capacity and provision of contingency, backup and spares in the case of breakdown).
Schedule of Environmental Objectives and Targets for the forthcoming year.
Report on the progress towards achievement of the Environmental Objectives and Targets contained in previous year's report.
Full title and a written summary of any procedures developed by the licensee in the year which relates to the facility operation.
Tank, drum, pipeline and bund testing and inspection report.
Reported Incidents and Complaints summaries.
Review of Nuisance Controls.
Reports on financial provision made under this licence, management and staffing structure of the facility, and a programme for public information.
Volume of foul water produced and volume of foul water transported off-site.
Any other items specified by the Agency.

Note 1: Content to be revised subject to the agreement of the Agency after cessation of waste acceptance at the facility.

Sealed by the seal of the Agency on this the 31st day of May, 2004

PRESENT when the seal of the Agency
was affixed hereto:

Padraic Larkin, **Director/Authorised Person**

Attachment B:

- **Certified Copy of Certificate of Incorporation**
- **Company's Number in Company's Registration Office**
- **Particulars of Registered Office of the Company**

Number 374837

Certificate of Incorporation on change of name

I hereby certify that

RILTA LIMITED

having, by a Special Resolution of the Company, and with the approval of the Minister for Enterprise, Trade and Employment, changed its name, is now incorporated as a limited company under the name

RILTA ENVIRONMENTAL LIMITED

and I have entered such name on the Register accordingly.

Given under my hand at Dublin, this

Wednesday, the 1st day of February, 2006

for Registrar of Companies

Rilta Environmental Limited

Date
10/08/2009

Company Profile

Company Number
374837

Main Details

Name: Rilta Environmental Limited
QuickRef: RILTA
Country: Ireland
Company Number: 374837
Incorporated: 18/08/2003
Company Type: Limited by Shares
Company Status: Active
Dissolved:

Primary Addresses

Registered Office: 151 Thomas Street, Dublin 8, Ireland
Presenter: Helen Farrell, One51, 151 Thomas Street, Dublin 8, IRELAND

Accounting Dates

	Last Period End	*Current Period End*	*Last Extended*
Accounting Dates:			

Past Names

From Date	Up To Date	Name
18/08/2003	01/02/2006	Rilta Limited

Appointments

Board Positions

Name	QuickRef	Position	Appointed
Beale, Nicholas	BEALE-N	Director	01/01/2006
Clancy, Seamus	CLANCY-S	Director	18/08/2003
Cotter, Sean	COTTER-S	Director	01/01/2006
Dixon, Paul	DIXONPAU	Director	30/09/2005
Duggan, Padraig	DUGGAN-P	Director	27/04/2006
Holburn, Susan	HOLBURN-S001	Secretary	30/09/2005
Ivanoff, Eftim	IVANOFF-E	Director	20/12/2007
Long, Michael	LONGM	Director	30/09/2005

Share Classes

Capital

Euro (EUR)

Class Name	Nominal Value	Authorised Capital	Issued Capital	Capital Weighting
Ordinary	€1.00	€10,000,000.00	€100.00	100.000%
	Total Capital	€10,000,000.00	€100.00	

Shares

Euro (EUR)

Class Name	Nominal Value	Authorised Shares	Issued Shares	Votes Per Share	Voting Weighting
Ordinary	€1.00	10,000,000	100	1	100.000%
	Total Shares	10,000,000	100		

Shareholders

€1.00 Ordinary shares

Name	QuickRef	Shares Held	% of Class	Voting %	Capital %
One51 ES Hazardous (Ireland) Limited	OES-HAZ-IRE	100	100.000%	100.000%	100.000%
	Total Allotted	100			

Attachment C: Fit and Proper Person

Bank of Ireland
Corporate Banking

Head Office, Lower Baggot Street
Dublin 2, Ireland
Tel +353 (0)1 604 4000
Fax +353 (0)1 604 4005
www.boi.ie/corporatebanking

Date: 12th August 2009

FAO: Environmental Protection Agency

Subject: Rilta Environmental Limited

Bank of Ireland has an existing relationship with **Rilta Environmental Limited.** All accounts held by **Rilta Environmental Limited** are currently in good standing. We would consider the management capable and trustworthy and feel that they would not undertake any commitment that they could not fulfil.

The above information is given in strict confidence for your private use only, and without responsibility on the part of this bank or the writer

Attachment D:
Liabilities, requirements & obligations

RILTA Environmental Limited

Rilta Environmental Ltd.

Unit 402

Greenogue Business Park

Rathcoole

Co. Dublin

10th August 2009

To whom it may concern,

We, the undersigned, as part of the senior management of Rilta Environmental Ltd. wish to take over the management of Waste Licence W0185-01. We are aware of all the conditions of the Licence and hereby undertake to remain compliant with those conditions. We would accept all liabilities, requirements and obligations provided for in the Licence, including the period prior to the transfer of the Licence.

Signed,

Mr. Nick Beale	Mr. Ettim Ivanoff	Mr. Colm Hussey
Managing Director	Operations Director	Facility/Environmental Manager

Attachment F: Estimated Expenditure & Financial Provisions

cara
Experience Knowledge Trust

Cara Waste Management Ltd
Cedar House, Greenogue Business Park
Rathcoole, Co. Dublin, Ireland

Tel: +353 1 40 10 250
Fax: +353 1 40 10 260

Email: info@caraet.com
Web: www.caraet.com

Mr. Donal Howley, Inspector,
Office of Environmental Enforcement,
EPA,
McCumiskey House,
Richview,
Dublin 14.

Cara Reference: 1851/050107/1

07 January 2005

Dear Inspector,

Re: 185-1
Waste Licence of Cara Waste Management Limited
Greenogue, Co. Dublin.

Subject: Environmental Liabilities Risk Assessment

I refer to Waste Licence Number 185-1.

The licensee, Cara Waste Management Limited (CWM), hereby submits to the Agency the Environmental Liabilities risk Assessment as per Condition No. 12.2 **Financial Provision for Closure, Restoration and Aftercare.** The condition states

"*Condition No. 12.2.1*

*The licensee shall arrange for the completion of a comprehensive and fully costed **Environmental Liabilities Risk Assessment** for the facility which will address liabilities arising from the carrying on of the activities to which this licence relates. A report on this assessment shall be submitted to the Agency for its agreement within six months of date of grant of this licence.*

I trust the report is agreeable to the Agency.

Yours sincerely,

D. Monahan,
Engineering Director.

Encl. Original & 2 no. copies

C:\DonalM\Transfer Station\EPA\Licence\Operational Phase\Licence\Reports\G007 ELRA\050107_EPA.doc

MARSH

Environmental Liabilities Risk Assessment Report

Cara Waste Management Ltd

Premises	Cedar House, Greenogue Business Park, Rathcoole, Co. Dublin
Date of Inspection	11th November, 2004
Contacts	Donal Monahan Engineering Director
Inspection by	**SEAN COLEMAN** **Senior Risk Consultant** **Direct Dial: 00 353 (0) 1-6048225** **Mobile: 00 353 (0) 87-2470217** **Fax No: 00 353 1-6785028** **e-mail:** Sean.Coleman@marsh.com

Disclaimer

The purpose of this report is to provide general advice on loss control activities. However, no responsibility is assumed for the discovery and elimination of hazards, which could possibly cause accidents or damage, nor do we certify to the adequacy or proper functioning of any existing safety measures inspected. The report contains data which is based upon conditions observed and information made available at the time of inspection. It does not purport to list that other hazards do not exist. Also, the report is not an assessment of employees health or suitability for designated tasks. No liability shall be assumed by virtue of this advisory report.

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Appendices

1 Insurance Summary

"InsursummaryCara - EPA.doc"

~2836033.pdf

2 Site Layout

3 Site Risk Assessment (No. GO-205)

G0-205 Risk Assessment 040910.pdf

Overview.jpg

4. Workflow for wastes diagram

1.0 Introduction & Scope

1.1 Introduction

Cara Waste Management Limited (CWM) operates a licensed hazardous waste facility at Greenogue Business Park, Rathcoole, Co. Dublin.

The licence requires that CWM submit an Environmental Liabilities Risk Assessment to the Agency for its agreement. The text of the condition of licence number 185-1 is as follows:

*12.2 **Financial Provision for Closure, Restoration and Aftercare***

*12.2.1 The licensee shall arrange for the completion of a comprehensive and fully costed **Environmental Liabilities Risk Assessment** for the facility which will address liabilities arising from the carrying on of the activities to which this licence relates. A report on this assessment shall be submitted to the Agency for its agreement within six months of date of grant of this licence.*

CWM has engaged Marsh Ireland to prepare the assessment in order to fulfil the licence condition.

Marsh carried out site inspections and reviewed several referenced documents but did not carry out any testing or site investigation.

The report reviews the site's:

- context and historical use,
- the current and planned operations and practices,
- the nature and characteristics of the site's materials and related environmental controls,
- the exposed population and the environmental habitat, and,
- the environmental routes and pathways by which hazardous materials might enter the environment.

It also includes a synopsis of existing insurance coverage relevant to the risks discussed.

1.2 Reference Documentation

The information and details adduced in this report have been sourced from the following documents:

1. Environmental Impact Statement prepared for the planning application 22nd May 2002.

2. Report: Capacity of Waste Handling Equipment Report No.: 1851/G001.

3. "Report on the Fire Precautions and the Design Criteria Used and Incorporated in the Waste Transfer Station Project" by Robin Knox and Associates.

4. Ongoing Environmental Management Programme. Schedule of objectives and targets for environmental improvements and risk reduction as part of EMS.

5. Risk Assessment (No. GO-205) which has been prepared as facility specific procedural review. The purpose of this procedure is the assessment of the risk of emergencies having the potential to result in adverse environmental impacts at the facility. This procedure forms the basis for the development of the Emergency Response Procedure GO-201.

6. Report on the Facility Management Structure: Report No. 1851/GOO4

These documents have been submitted to the EPA and can be made available to remote readers upon request.

2.0 General Information & Site History

2.1 Company Profile

CWM moved to the purpose-built hazardous waste facility at Greenogue, near Rathcoole, in July 2004. The premises was developed on a greenfield site which was previously arable farmland in rural setting. The facility is located in a developing industrial estate.

CWM, a wholly owned private Irish company with a proven track record in waste management, had previously operated from headquarters in Clonskeagh. The company, which was established in 1999, has developed in niche sectors of the market and for 2004 has an expected turnover of approximately €8 m.

BDO Simpson Xavier is the appointed financial auditor for CWM.

Neither CWM nor any of the company's directors have ever been prosecuted for an environmental offence.

2.2 Description of Operations

The facility at Greenogue has been set up to serve specific hazardous and non-hazardous waste needs nationally. The facility provides capacity to collect sort and bulk smaller quantities of hazardous and non-hazardous wastes for treatment at approved facilities in Ireland and abroad. The standard operating procedures and, more specifically, the waste acceptance criteria employed at the facility have been established to ensure that the facility operates within the scope of the licence. Currently the facility does not store waste at quantities that exceed the lower tier thresholds of the Control of Major Accident Hazards involving Dangerous Substances Regulations.

The facility is licensed to handle the types and quantities of waste as outlined in table A1 below.

2.2.1.1 Table A.1 Waste Categories and Quantities

WASTE TYPE	MAXIMUM (TONNES PER ANNUM)
Sewage Sludge	2,000
Household Waste	7,000
Construction and Demolition Waste	1,000
Industrial Sludge	2,000
Commercial and Industrial Waste	15,000
Hazardous Waste as listed in Table E.2.2 entitled 'Hazardous Waste Types and Quantities' of the application.	33,000
Total	60,000

The company operates collection trucks for small producers and household hazardous wastes, however the bulk of materials coming on site will be through third party agents or contractors with prior bookings and delivery arrangements. Although most deliveries will take place during the standard 5-day working week there will be deliveries at 'out of hours' times which will be supervised by qualified CWM personnel. Currently the operation involves little physical handling of hazardous goods in that most of the containers remain sealed having been tested and filled off site.

The operation is essentially a reverse distribution business aimed at accumulating viable quantities of similar wastes for onward shipment to recycling or waste treatment plants. Wastes may be stored for up to 6 months, as per licence, but this practice would be exceptional.

In brief the following activities are envisaged for the moment:

- · Receipt of packaged and unit loads of waste material
- · Storage of packaged and unit loads of waste material
- · Dispatch of packaged and unit loads of waste material

Additional activities, which are subject to Specified Engineering Works conditions in the Licence, will be initiated by separate submissions to the EPA and not undertaken until the approval of the Agency has been obtained.

At the current level of operation the necessary equipment has been provided for the handling of a maximum of 15,000t per annum of packaged or itemised waste, as per Report 1851/G001. It is further proposed that the facility will manage an annual throughput of 10,000t of bulk liquid waste. This will not require any handling equipment on site but merely provide for the parking of ISO tanks en route to a treatment destination.

The company operates well developed management systems and is independently accredited to ISO 9001:2000, 14001 & OHSAS 18001 standards. It is a member of the Irish Waste Management Association.

The site generally operates from 0800 hrs to 1800 hrs Monday to Saturday with a complement of approximately 35 staff, five of whom are involved directly in the materials handling at the transfer station. All the staff have appropriate qualifications in science or engineering with some trained in emergency response and as dangerous goods safety advisors.

2.3 Site History

The original Greenogue Industrial Estate, located to the south of the site, has been in existence since the early 1960's but under the South Dublin Development plan of 1998 permission has been granted for further development which is now largely underway. Immediately adjacent to the eastern boundary of the premises is a waste timber recycling plant operated by Bailey Waste Recycling (a development for which planning permission was sought and granted retrospectively). A further waste transfer facility operated by Greenstar has recently been constructed beyond the Bailey's facility to the east.

Site sampling at excavation stage did not indicate any previous pollution other than that associated with standard agricultural use. There was no historic industrial activity in close proximity to the site. The nearest dwelling is approximately 400m to the west of the site.

3.0 Location/Exposure

The plant is situated on own site in the recently developed northern section of the Greenogue Business Park, some 1.5 km east of the village of Newcastle. Details of the outlying areas are described in detail in the Environmental Impact Statement. The nearest dwelling is approximately 400 m to the west of the site. There are no hospitals, hotels or holiday accommodation within 1 km of the site. Casement Military Aerodrome (Baldonnel) is located approximately 0.5 km north of the site.

The immediate area is industrial, relatively flat with agricultural land beyond.

The facility encompasses approximately 0.5 hectares , all of which, with the exception of approximately 130m^2 of landscaped area, is either paved or occupied by buildings. There are three adjoining buildings including the Warehouse (1560m^2), Hazardous Chemical Store Building (219m^2) and the Offices (158m^2). There is a weighbridge at the site entrance and a covered Tanker Bay (167.6m^2). The open yard areas (2760m^2) are paved with reinforced concrete slab. All the buildings are designed and constructed in accordance with the Building Regulations and a Fire Certificate has been issued for the facility. The hazardous chemical stores are effectively fire separated from the main warehouse and from each other.

The relationship of the premises to the adjoining properties is as follows:

- on the southern side is a warehousing operation,
- on the eastern side is Bailey Waste Recycling,
- on the northern side is a culverted stream followed by an undeveloped site, and,
- on the west is the estate road where the entrance to the facility is located.

The premises occupied by Bailey's timber waste recycling operation is essentially an open yard where timber waste is shredded and otherwise reduced. The entire yard and certainly that side adjoining the CWM premises is bounded by 6.5m high concrete slabbed wall topped with netting. To the east of Bailey's is a further waste management facility occupied by Greenstar which incorporates high bay structure and open yards.

Immediately to the north and some 6.5m from the CWM boundary is a site under development for industrial purposes. The boundary of Baldonnel Aerodrome is a short distance (circa. 250m) beyond and further development in this direction will be restricted as a result.

In terms of an exposure to a fire risk the close proximity of the timber waste recycling plant represents such an exposure, and this is currently controlled via the concrete slab walling to 6.5 m in height.

The surrounding area is relatively flat and not particularly exposed to natural perils such as windstorm or flooding.

4.0 Sensitive Areas or Receptors

The facility is located in the catchment of the River Griffeen, which is a tributary of the Liffey. A culverted tributary of the Griffeen River adjoins the northern boundary of the CWM premises,. It has been reported in the EIS that there is evidence that water quality has been impacted by the surrounding landuses.

The bedrock aquifer beneath the site has been provisionally classified by the Geological Survey of Ireland as follows:

Site	Rock unit	Provisional Aquifer classification
Greenouge, Co. Dublin	Dinantian Upper Impure Limestones	Ll Bedrock which is moderately productive only in local zones

The sub soil depth and classification has yet to be determined.

There are no known groundwater extraction wells within 500m of site.

It is envisaged that groundwater monitoring wells will be installed within next 6 months in accordance with EPA license condition 3.15.

The nearest major schools are in Newcastle and Rathcoole , some 1.7km and 2km away respectively. There is a Montessori school approx. 687m to the southeast of site. The nearest hospital is Peamount some 2 km to the east of site. The nearest hotel is some 3km distant in Saggart. The National Primary Route (N7) lies within 1.5km to the south of the site.

As per the EIS the site is not listed as SAC or NHA there are no listed monuments within 500m of the site. There are no listed ecological sites in close proximity other than the tributary to the River Griffeen, which in turn drains to the River Liffey.

5.0 Environmental Affairs Management

The facility is operated by CWM in accordance with the conditions of the waste licence which, inter alia, addresses many of the conditions for reporting, analysing, monitoring etc. which are imposed by the EPA. The company in accordance with its independently accredited ISO 14001, Environmental Management System carries out reviews and seeks continuous improvement. Similar systematic reviews are also integral to the accredited quality and safety management systems, ISO 9000 and OHSAS 18001 respectively

In accordance with license conditions monitoring has been recently carried out and results are awaited. Owing to the low-level nature of operations and the recent commencement of operations, results ought to be well below specified limits

There have been no breaches of previous licences, planning laws etc.

The facility manager and deputy have several responsibilities, which are outlined in the various procedures under the EMS and Safety management systems.

The management structure going forward is outlined in the Report 1851/G 004 submitted in compliance with a licence requirement.

See recommendations for further commentary on ongoing risk control procedures.

6.0 Environmental Routes

6.1 Surface Water Contamination Potential

The surface and foul water systems are described in detail in Report No.: 1851/G003

Essentially systems have been installed to provide containment for the entire site. Formal bunding has been provided in accordance with EPA guidance to capture spillages within the tanker bay, loading areas, main warehouse and hazardous chemical stores. Valves with remote isolation have been provided together with manual valves to prevent and store spillages from the external paved areas of the facility.

The Hazardous Chemical Store has been designed and constructed to provide high quality storage for hazardous wastes (meeting Dangerous Goods classification criteria) pending removal for off-site treatment or disposal. The store has three separate compartments, which are fire segregated, and is provided with full spill containment in the form of an underground reinforced concrete tank with a total capacity of $300m^3$.

Hazardous waste delivered to the facility in road going tankers and ISO tanks and containers are stored in a covered Tanker Bay area, which is also provided with full spill containment. There is no external handling or processing of waste and, with the exception of the covered Tanker Bay, there is no external storage of wastes. The Tanker Bay is constructed of reinforced concrete and has a storage capacity of $31m^3$, with an overflow facility to the adjacent storage tank beneath the Hazardous Chemical Store.

The facility design incorporates full spill containment for all areas where wastes are handled, processed and stored.

The Warehouse is provided with a reinforced concrete containment kerb around the entire building, with ramps at the entrances, that provides an internal storage capacity of $225m^3$.

A separate surface and foul water drainage system is provided on the facility premises. Surface run-off from the paved yard areas and the weighbridge is collected and directed to the on-site attenuation tank via a Class 1 interceptor. Runoff from building roofs drains directly to the attenuation tank, which, in turn, drains to the surface water sewer.

The facility surface water discharge flow is regulated by a hydrobrake and there is an electrically and manually activated shut off valve between the hydrobrake and the connection to the sewer. The valve is closed when the Emergency Response Procedure is invoked.

Sanitary wastewater is discharged to the municipal foul sewer via the facility foul sewer. Floor wash water from the Warehouse is collected and directed to an underground reinforced concrete holding tank ($5m^3$). The wash water is tested to confirm its suitability in accordance with the licensed discharge parameters before it is discharged to the foul sewer. A firewater retention assessment of the facility has concluded that the existing site design and layout provides more than adequate storage capacity for contaminated fire water run-off likely to be generated in fighting a major fire at the facility [reference Report on the Fire Precautions and the Design Criteria by R. Knox and Associates, dated 3/9/04].

It is recommended that further information by way of placards and revised emergency procedures with instructions for fire service be drawn up. See recommendations.

6.2 Ground Water Contamination Potential

The various physical protections and procedures described under the previous heading also apply to this section.

There has been no detailed site-specific study and there is as yet no vulnerability classification assigned by the GSI. The aquifer is provisionally classified as follows by GSI:

Site	Rock unit	Provisional Aquifer classification
Greenogue, Co. Dublin	Dinantian Upper Impure Limestones	Ll

There are no extraction wells within 500m of the premises.

6.3 Air

There is unlikely to be any significant ongoing emissions from the existing processes and in the event of spills adequate physical and procedural provisions are in place.

Provision has been made for shredding of waste and the decanting of volatiles in specially segregated area in the warehouse mechanical extraction will be provided in both cases with means to collect dust and voc /cfc emissions respectively. Installation and operation of these systems will be subject to approval of specified engineering works by the EPA.

In a catastrophic situation such as a fire there is the possibility of the release of volatile substances and noxious fumes however reasonable planning has been attached to such risks. See referenced risk assessment No. 3 in appendix.

7.0 Site Operations and Practices

During operational hours the facility is staffed by CWM personnel and outside these hours by a contract security firm, which manages the business park.

All wastes delivered to the facility pass over the weighbridge. Those wastes intended for processing and repacking on-site are directed to the Warehouse, where all processing and waste repackaging is carried out. This building is provided with full spill containment. There are waste inspection and waste quarantine areas and dedicated storage areas for the processed non-hazardous waste (e.g. plastic, paper metals) inside the building.

The processing and repacking that may be carried out in the building includes:

- shredding, baling and drumming
- manual dismantling of waste electrical items
- manual removal of components of certain waste items
- bulking of compatible liquids into drums.

Currently the operation is mainly focussed on the accumulation of wastes into viable quantities for onward transmission to waste treatment of recycling facilities at home and abroad.

The properties of the waste materials determine the manner in which they are handled and stored. The workflow diagram no. 4 in the appendix illustrates the vetting process for receipt of, and onward transfer of wastes. Additional assistance will be sought in particular circumstances as necessary. The definition of hazardous waste applied for waste management purposes is insufficient to identify the hazards associated with particular materials. Information, such as that contained in material safety data sheets (MSDS), provides more detail on the hazards associated with that particular material and the appropriate handling and storage requirements. The international norm or standard for classifying materials utilises a grouping process based on the hazardous properties of the material. This approach, which is described in the **UN Storage of Hazardous Materials – a Technical Guide for Safe Warehousing of Hazardous Materials** and the UK Health an Safety Executive's document **Chemical Warehousing – the storage of packaged dangerous substances**, is applied as appropriate at the facility. Hazardous wastes (meeting Dangerous Goods classification criteria) stored on-site pending removal for off-site treatment or disposal are stored in the Hazardous Chemical Store. This has three separate compartments and is provided with full spill containment. Hazardous waste delivered to the facility in road going tankers and ISO tanks are stored in a covered Tanker Bay area, which is provided with full spill containment. There is no external handling or processing of waste and, with the exception of the covered Tanker Bay, there is no external storage of wastes. The facility design incorporates full spill containment for all areas where wastes are handled, processed and stored.

The facility benefits from comprehensive automatic fire detection system and oxygen depletion and gas/solvent detectors in specific areas.

7.1 Waste

The management and handling of waste is the express business of CWM, however the limited processes carried and planned should produce little or no additional waste of significance

7.2 Fuel Storage Tanks

There are no underground storage tanks. There are no fuel tanks on site. Electric forklifts are in use. There is no standby generator. There are no oil filled transformers.

7.3 PCB's

There are no PCB's in the site electrical facilities, as it is a modern plant. There is the possibility that PCB's would be handled as hazardous waste.

7.4 Asbestos

There are no asbestos-based building materials utilised in the facility, as it is a recently constructed modern plant. However asbestos may be handled as a hazardous waste.

8.0 Conclusions

The overall standard of risk control at the waste transfer station in terms of physical and procedural elements is excellent and has come about as a result of comprehensive planning and consultation. Although it is early days in the operation of the facility and not all the proposed operations are up and running standards are being maintained at high level.

The following scenarios are discussed and should be read in conjunction with those mentioned in section 8 of the referenced Risk Assessment in Appendix No.3.

8.1 Fire

One of the biggest risk factors is the proximity of the timber waste recycling facility. A serious fire in the open yard, which is only some metres away from the rear of the premises, could spread to the CWM facility. It is of course likely that there would be early fire brigade intervention to stem the spread aided by on site detection at the CWM premises, namely smoke detection. Currently there is a 6.5-m concrete slab wall around the western perimeter of the timber waste recycling facility, which should help to prevent spread under reasonable circumstances. The eastern wall of the hazardous good stores and warehouse is rated for one-hour (integrity 60 mins. plus insulation 16 mins.) fire resistance. The main tanker-parking bay (southeast corner) however has only single skin metal cladding. The tankers or trailers may contain significant flammable or volatile substances. Depending on developments and practices in the adjoining site it may be considered prudent to upgrade the fire resistance of the cladding on the exposed wall in this bay.

Apart from reviewing the cladding it is also recommended that additional measures such as placarding and instructions relative to emergency response by outsiders, e.g. the fire service be erected in a conspicuous location. This should address isolation valve location and operation.

In the event of fire from a source within or outside the facility it is considered likely that the bulk of the hazardous goods would remain on site in the buildings or the various containment facilities as described in the assessments.

It is considered that fumes from burning plastic materials, typical of most industrial fires, would be expected but that they would not be much different than what the emergency services normally encounter in such circumstances. There is likely to be only localised effect from burning volatile substances in which case the liability should be quite limited and the existing levels of insurance cover should be sufficient subject to adequate reinstatement values.

8.2 Accidental Spillage

It is extremely difficult to forecast a situation on site where a hazardous liquid accidentally spilled would migrate beyond the site boundary. All significant areas have individual containment. It is envisaged that the worst case would arise where a valve was not activated to prevent a discharge or the a valve was opened prematurely following a spillage in the paved area.

For example in the case of a spillage of 1000 litres there would be considerable dilution before entering the Griffeen River a tributary of the river Liffey. Cleanup would nevertheless be necessary and the public liability indemnity of €6.35 million should provide reasonable cover given that a sudden and unforeseen event is being considered.

8.3 Gradual Leakage.

It is even more difficult to envisage such a scenario developing given the regime of containment in place together with site practices. Although there may be no insurance in place specifically for such a scenario it is likely that loss would be minimal. On the other hand it is prudent to bear in mind the possible vulnerability of the local aquifer (not yet officially classified as per Geological Survey of Ireland) should there be a change in site conditions or a future failure of on site protections or risk control.

Overall the risk of environmental liability arising at this location based on current conditions is low due to good internal risk control and the relatively low risk profile of most of receptors in the vicinity subject to the vulnerability classification of the of local aquifer.

The existing insurance coverages should be reasonable for on site activities. Gradual pollution is not covered under the current schedule of insurances.

9.0 Detailed Recommendations

The recommendations are classified as category; High, medium or low.

Recommendation	
01-11-04	**Emergency Response** *Medium priority Est. cost <€1000* i) The emergency response placard or plan should clearly indicate the location of fire hydrants, the various isolation valves, the remote isolation switches/buttons and a basic illustration of the outflows from site. The plan should also indicate the high hazard storage areas. (It is accepted that there is sufficient signage on the wall of such stores). Apart from erecting these placards or signs at appropriate points in the site or on the site you should send a copy to the fire brigade. ii) The emergency response procedure should be updated to reflect appropriate advice to the third party emergency responders generally the fire brigade. In particular this should mention the various stop valves and means of isolating same as well as relevant plant contacts. iii) A windsock should be provided at appropriate point on site. It should be clearly visible from most positions and sufficiently high above adjoining buildings. iv) Currently the foam and foam cannon are located directly adjacent to the main warehouse. Consideration should be given to storing this equipment and foam remote from main hazard locations e.g. along fencing (secure housing).
02-11-04	**Containment.** Priority low, Est.cost < €1,000 i) The curb at the rear of the packaging room adjacent to neighbours needs to be sealed off at approximately mid point and made continuous. ii) The exit doors from the hazardous goods stores should ideally have a seal or other means to prevent liquid/fire water from flowing through the

Recommendation	
	doors. It is accepted that there is sufficient drainage on the floor, this could be an issue in the event of catastrophic event.
03-11-04 03-11-04	**Ongoing Risk Control** *Priority low, Human element* i) A matrix or catalogue showing testing inspection and maintenance regime of all safety/environmental critical issues should be drawn up and implemented. It is accepted that most of the equipment is relatively new and maintenance regimes are being put in place. E.g. fire and gas/vapour detection, emergency lighting, bund levels and integrity, fire doors, foam storage fire extinguishing units, fire hose reels. For gas detection see recent HSE Guidelines www.hse.gov.uk/pubnsgasdetection/pdf. ii) Ensure that there are a series of work permits on site such as hot work, confined space entry, work at heights and general contractors permit.
04-11-04	**Exposure to Fire** *Priority low, cost upgrade wall circa €8,000* There is a considerable fire load in the adjoining timber waste-recycling centre. Currently there is a 6.5 metre concrete slab wall offering exposure protection. Although it seems under the building regulations there was no requirement to provide a fire resistant wall along the east side of the tanker parking bay we recommend that you review the necessity to upgrade the fire resistance of the existing wall. Much will depend on the level of storage on the adjoining premises and condition of the concrete wall in the adjoining premises. Confirmation should be sought that there are sufficient water supplies to deal with fire emergencies in the vicinity. It is noted that there is 100-mm diameter fire main on site.

INTRODUCTION

This summary is intended to provide a ready reference to your insurances.

Each page provides brief details of cover. It is nevertheless essential that you be familiar with the wording of conditions, clauses, warranties, definitions, restrictions and exclusions which appear on your individual policies.

If you need further information please refer to the policy, or contact us.

MATERIAL FACTS / DUTY OF DISCLOSURE

INFORM INSURERS:

You are obliged to inform your Insurers of all material information when originally negotiating and placing the risks with the Insurer and also at each renewal date. In addition, many policies require you to immediately notify any material change in the risk during the period of insurance. Failure to notify Insurers of material information or changes could invalidate the insurance.

WHAT IS A MATERIAL FACT:

Material information or changes or any information or change likely to influence an Insurer in acceptance or assessment of a risk, the level of premium to be charged, terms or conditions to be applied or in seeking additional information. The following are just some examples of material facts:

w **Buildings**

- Occupancy/style of business carried on/type of heating/new extension of different construction/security and fire fighting facilities.

w **Manufacturing**

- Processes and materials involved/type of machinery or product being manufactured or stored.

w **Health**

- Personnel with physical or mental disability, infirmity or disease.

w **Accidents/Losses**

- Accidents or losses (whether insured or not) that were or could have been the subject of an insurance claim:

  * in connection with the business insured

  * in connection with any other business of the policy holder insured.

  * in connection with any other business of Directors/Principals of the Policy holder

w **Terms**

- Any declinature or refusal to renew or the imposition of special terms by an Insurer relating to risks of the business or businesses/personal risk past or present of Directors/Principals of the policy holder.

w **Vehicles**

- Changes in use of vehicle or occupation of driver
- Age profile of drivers
- Provisional licence drivers

w **Offences - Company/Partnership/Directors/Partners**

- Any conviction or prosecution pending for any offence including a conviction or prosecution relating to the driving or charge of a motor vehicle while under the influence of alcohol or drugs.

w **Liquidations, Receiverships, Examinerships, Bankruptcy etc.**

- Details of any involving the policy holder/directors or partners of the policy holders.

N.B. ***If you are in doubt about whether a fact is material contact us for assistance.***

IMPORTANT

SUMS INSURED AND LIMITS OF INDEMNITY:

Sums insured and limits of indemnity have to be adequate to cater fully for any possible loss. Inadequate cover can result in you having to bear all or part of a loss. Sums insured and limits should therefore be regularly reviewed. Where appropriate, the advice of a Professional Valuer should be sought.

WARRANTIES /CONDITIONS:

All policy warranties and conditions have to be strictly complied with. Failure to do so will invalidate your insurance. We recommend that you read the policies carefully and ensure all conditions and warranties are being fulfilled at all times. If for some reason you cannot comply with a warranty or condition you should notify us immediately in order that the matter can be taken up with your Insurers.

EXCLUSIONS:

All Policies contain exceptions that exclude certain types of losses. Your policies should be carefully examined to ensure that these exceptions are understood. It may be possible for certain exceptions to be altered or deleted. Please notify us if there is any need for a change.

CONTRACTS, LEASES AND OTHER AGREEMENTS:

Contracts, Leases, Agency, Suppliers or other Agreements can impose additional liability, duties or obligations on you. Most insurances exclude liabilities assumed by Agreement which would not have attached in the absence of such Agreements.

All Contracts leases and Agreements should be carefully examined by you in conjunction with your Legal Advisors. Please notify us immediately of any additional liabilities imposed on you in order that the matter can be taken up with your Insurers.

HEALTH AND SAFETY:

Aside from insurance, it is critical to manage your risk exposures. In this regard, we can give specific advice and direction to our clients concerning compliance with the vast amount of statutory health and safety legislation that applies to industry. This includes Safety Statement completion, Risk Assessments and direction on industrial problems such as workplace noise and exposure to hazardous chemicals. Improving health and safety in the workplace reduces claims and is ultimately reflected in lower premium costs.

CLAIMS:

All policies contain conditions regarding the notification of claims. It is important that all incidents which may give rise to a claim are reported to us promptly. This ensures that you do not prejudice your entitlement to indemnity under your policies.

Please also note the following points:

- Liability should never be admitted for accidents involving Third Parties or employees.

  Solicitors' letters, writs, summonses or other claims on behalf of Third Parties or employees should be forwarded to us immediately, unacknowledged, so that we can have them dealt with on your behalf.

- In relation to Property Damage, any damaged parts should be retained for subsequent inspection and efforts should be made to minimise the loss.

  Please be aware that immediate notification to the Garda is usually required on Property policies where burglary/theft is involved.

  Such notification is also usually required on "All Risks" and Travel policies and it is important that all receipts are retained to substantiate a claim.

- In the event of a motor accident drivers have an obligation to exchange relevant particulars at the scene of the accident.

  Note: It is essential to notify the Garda where an accident results in personal injury or substantial property damage.

Summary of Insurances

Prepared for

CARA WASTE MANAGEMENT LTD.

COMMUNICATIONS

Telephone: **00353 1 6048100** **Tele fax:** **00353 1 6048472**

Account Executive	Kevin McCann	6048262

Prepared August 2004

A/C 080501

CARA WASTE MANAGEMENT LTD.

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NOTES **Cara also hold ancillary covers such as: Computer, Money et al**

Amongst the coverages not currently held by Cara are Environmental Impairment Liability.

Insured: Cara Waste Management Ltd.

Class of Cover: Office Combined – Property Damage Section

Cover: All Risks including theft

Next Renewal Date: 23rd August 2005

Location:

	Buildings	Contents	Stock
14a Greenogue Business Park, Rathcoole, Co Dublin	€3,000,000	€100,000	€30,000

Deductible: €2,500 each claim

Notes: The cover is on a reinstatement basis.

The insurer is Allianz.

Policy COPRP 3227674

It is noted that the Building at Greenogue is owned by Daisy Investment Partnership and the interest of Anglo Irish Bank is also noted..

Marsh File Reference 24305377

Insured:	Cara Waste Management Ltd.
Class of Cover:	Office Combined – Business Interruption
Next Renewal Date:	23rd August 2005
Risk:	All Risks of physical loss or damage as per policy wording but excluding Terrorism.
Cover:	Cover provided in respect of loss of revenue and increase in cost of working as defined in the policy following upon loss or damage by an insured risk to property as detailed in the Property Damage section.
	Sum Insured - €3,809,215
	Indemnity Period - 12 months from date of incident giving rise to loss.
Marsh File Reference:	24305377
Insurer	Allianz CO PRP3227674

Insured:	Cara Waste Management Ltd.
Class of Cover:	Combined Liability – Employers Liability Section
Next Renewal Date:	23rd August 2005
Territorial Limits:	European Union – Worldwide in respect of business trips by non-manual employees
Cover:	Legal Liability to pay compensation to employees for damages, legal costs and expenses in respect of injury/illness/disease arising out of and during the course of their employment.
Limit of Indemnity:	€13m any one event or series of events arising out of one cause. This limit is inclusive of all payments for compensation and legal costs.
Deductible:	€13,500 each claim including costs.
Employee Classification:	Clerical & Administrative €1, 105,000 Site Supervisors € 210,000 All Other Employees incl Drivers € 346,500
Indemnity to Others:	Indemnity to Directors/Senior Executive of the Insured in their private capacity arising out of their temporary engagement of the Assured's employee. Indemnity to Officers, Committee and Members of the Assured's Social, Sports, Medical, Fire Fighting and Welfare Organisations in their respective capacity as such.
Marsh Ref.	24305382
Insurer	Brit Insurance Co B2401066

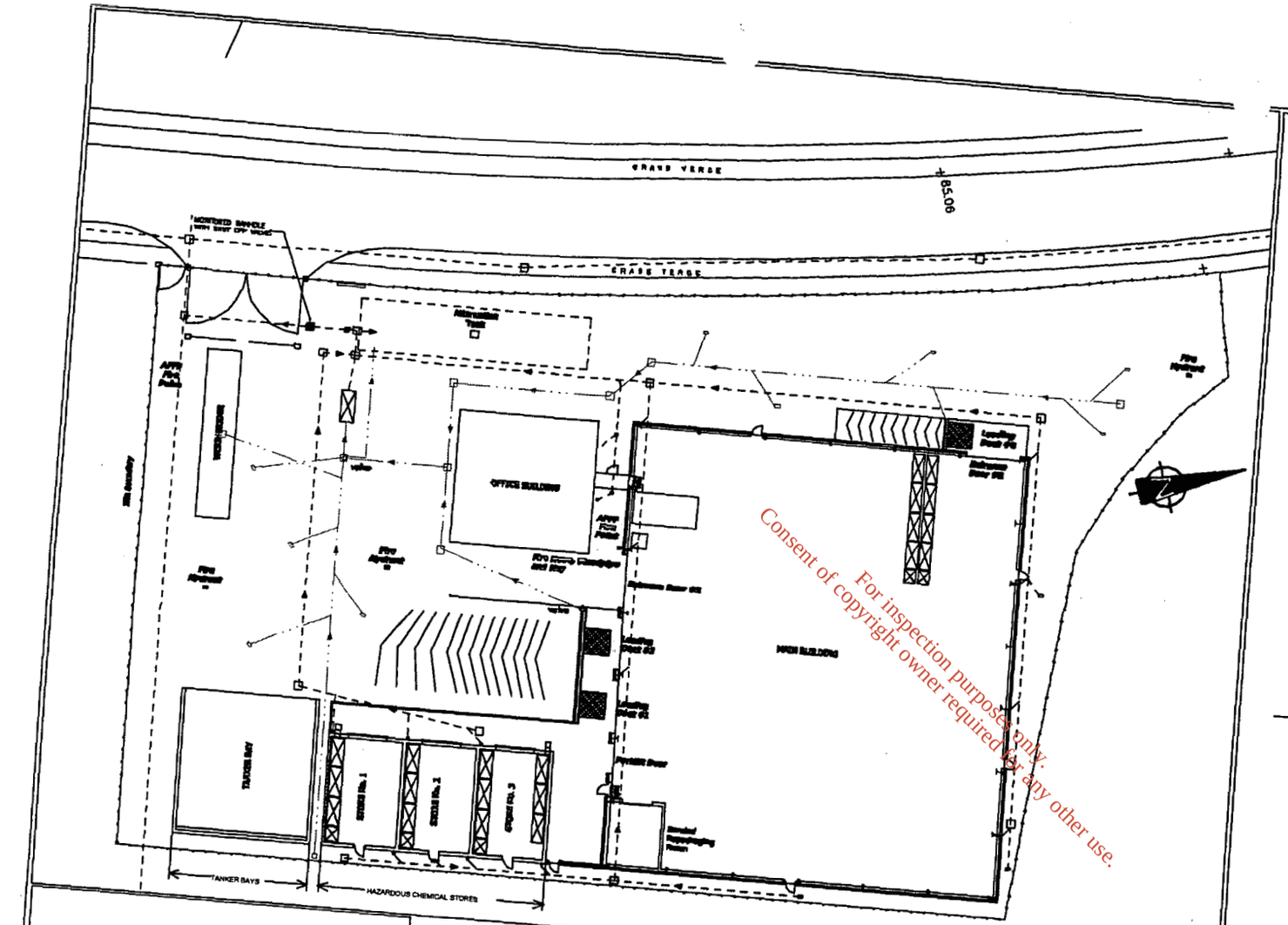
Insured:	Cara Waste Management Ltd.
Class of Cover:	Combined Liability Policy – Public/Products Liability Section
Next Renewal Date:	23rd August 2005
Territorial Limits:	European Union – Worldwide in respect of business trips by non-manual employees.
Cover:	Legal liability for death of or injury to a Third Party in respect of accidental death, bodily injury or disease or accidental loss of or damage to Property arising out of the insured business as stated on the policy. Including cover in respect of liability to pay claimants costs and expenses and all other costs and expenses incurred with Underwriters written consent.
Limit of Indemnity:	General - €6,350,000 any one occurrence Products/Pollution - €6,350,000 in the aggregate in the Insurance period
Notes:	Cover is on a claim made basis, and covers only claims made during the policy period and arising out of activities occurring after the retroactive date 01.09.1995 Estimated turnover €26 ,000,000
Deductible:	€25,000 each and every claim including costs.
Marsh Ref.	24305382
Insurer	Brit Insurance Co B2401066

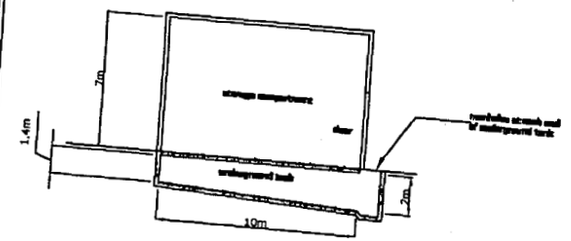
Notes applicable to both Employers Liability and Public Liability policies.

- Burning and Welding Conditions apply as per wording
- Safety Statement Condition applies
- It is warranted that Rights of Recourse are maintained against suppliers of materials and other parties
- Excluding Professional Indemnity and E&O claims
- Inefficacy Clause applies
- Pollution Cover – Sudden unforeseen, unintended event as per wording ie gradual pollution not covered.
- Solchem noted as joint insured
- Jobs involving asbestos to be advised separately - no automatic cover.
- Terrorism Exclusion
- Business: Consultants Arrangers & Contractors for the recovery, treatment and disposal of waste chemicals, Pharmaceuticals and other hazardous and other materials. Property Owners.

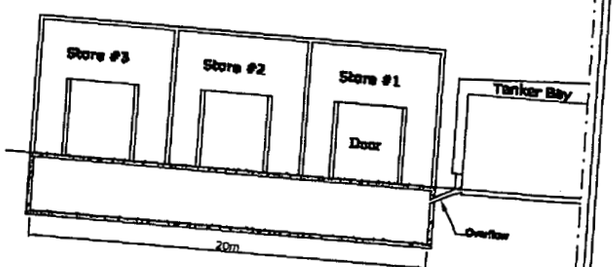
Insured:	Cara Waste Management Ltd.
Class of Cover:	Motor
Next Renewal Date:	23rd August 2005
Vehicles:	Any motor vehicle owned by or leased or on hire to the insured but excluding employees vehicles. Premium adjustable in accordance with annual declaration
Drivers:	Open Driving – any person aged between 25 and 65 driving with Insured's consent.
Usage Insured:	Social, Domestic and Pleasure and use in connection with Insured's business
Cover:	Comprehensive comprising Third Party Liability Fire Theft and Accidental Damage
Deductible:	€315 each claim other than liability and windscreen breakage.
Notes:	Whilst detached, any trailer must be in Insured's care, custody or control and cover is Third Party only. The limit for liability for damage to third party property is €30m in respect of private cars and €2.6m in respect of commercial vehicles.

The insurer is Hibernian and the policy number is MF560344682





Cross Section



Elevation

Hazardous Chemical Stores & Underground Tank

Legend

Pavement Drainage

Roof Drainage

Racking

REV	DESCRIPTION	BY	DATE	CHK

cara
Experience Knowledge Trust

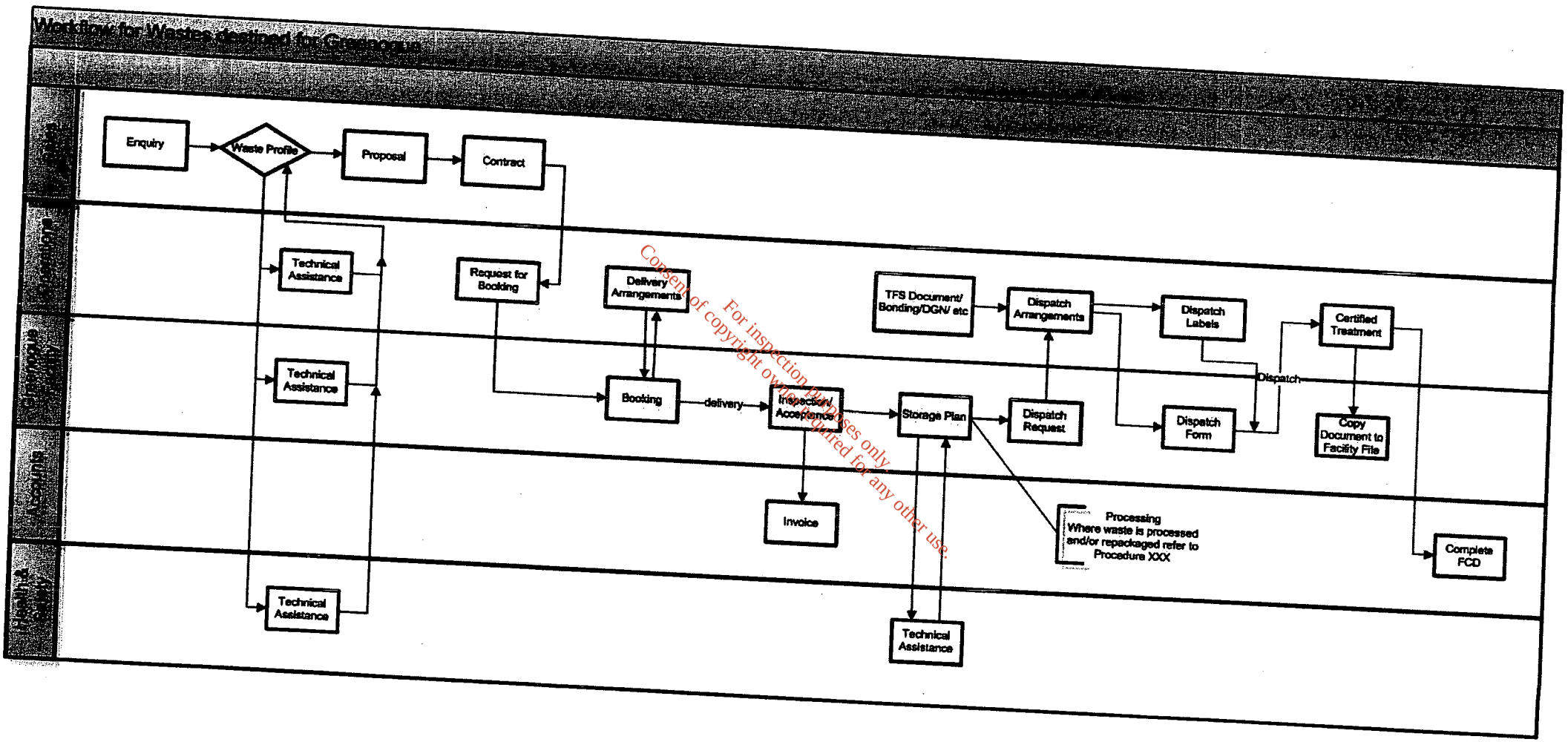
Cara Waste Management Limited
Cedar House,
Greenogue Business Park
Rathcoole,
Co. Dublin.
Tel: + 353 1 2601199
Fax: + 353 1 2601160

DRAWN	D Monahan	SCALE	1:400
APPROVED	DM	DATE	13/9/04

PROJECT: Greenogue Facility

TITLE: Equipment Layout

DRG NO. 569-42-G005 REV 0



cara Experience Knowledge Trust Designator	**Procedure Title:**	**Risk Assessment**		
	Procedure No.	**GO-205**		
	Preparation Date:	10/9/04	**Effective Date:**	tba
	Revision:	draft	**Pages:**	14
	Responsibility:	Facility manager		

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2.0 Purpose

The purpose of this procedure is the assessment of the risk of emergencies having the potential to result in adverse environmental impacts at the facility. This procedure forms the basis for the development of the Emergency Response Procedure GO-201.

3.0 Introduction

The facility is a hazardous waste facility developed for the treatment and onward shipment of waste materials for recovery and for recycling. The wastes include hazardous solid and liquid waste and non-hazardous waste solid waste and sludges, as specified in the Waste Licence (Reg. No. 185-1).

This procedure identifies:

a) the emergencies that could potentially occur at the facility,
b) assesses the level of risk, and,
c) presents guidance on measures to be applied to either eliminate, or where this is not possible, to minimise the risk.

4.0 Responsibility

The Facility Manager is responsible for ensuring the execution of this procedure. The responsibilities of the Facility Manager may be delegated to a Nominated Deputy, but primary responsibility for implementing this procedure shall remain with the Facility Manager. The Facility Manager is responsible for monitoring the effectiveness of this procedure and at minimum the procedure shall be reviewed at the following frequencies:

- Following an Emergency
- Prior to the start of specified engineering works at the facility
- Prior to the introduction of new or significant amendments to existing facility operating procedures
- Annually

5.0 Site Location and Description

The facility is located at the northern boundary of the Greenogue Business Park. Land use in the surrounding area includes industrial, commercial and agricultural uses. The nearest dwelling is approximately 400 m to the south of the site. There are no hospitals, hotels or holiday accommodation within 1 km of the site. Casement Aerodrome (Baldonnell) is located approximately 0.5 km north of the site.

Based on site investigation data from other sites in the Business Park, the overburden is shallow (<3m) and comprises a grey silty CLAY with cobbles and boulders, which can be described as a boulder clay. The bedrock aquifer beneath the site has been classified by the Geological Survey of Ireland as a Locally Important Aquifer that is productive only in local zones (**Ll**). Based on the available information on the local geobgy the aquifer vulnerability beneath the site is considered to be extreme.

The facility is located in the catchment of the River Griffeen, which is a tributary of the Liffey. A culverted tributary of the Griffeen River forms the northern boundary of the Business Park, which includes a portion of the northern section of the site boundary. There is evidence that water quality has been impacted by the surrounding landuses.

6.0 Facility Layout

The facility encompasses approximately 5000m^2 all of which, with the exception of approximately 130m^2 of landscaped area, is either paved or occupied by buildings.

There are three adjoining buildings including the Warehouse (1560m^2), Hazardous Chemical Store Building (219m^2) and the Offices (158m^2). There is a weighbridge at the site entrance and a covered Tanker Bay (167.6m^2). The open yard areas (2760m^2) are paved with a minimum of 120mm reinforced concrete slab. All the buildings are designed and constructed in accordance with the Building Regulations and a Fire Certificate has been issued for the facility.

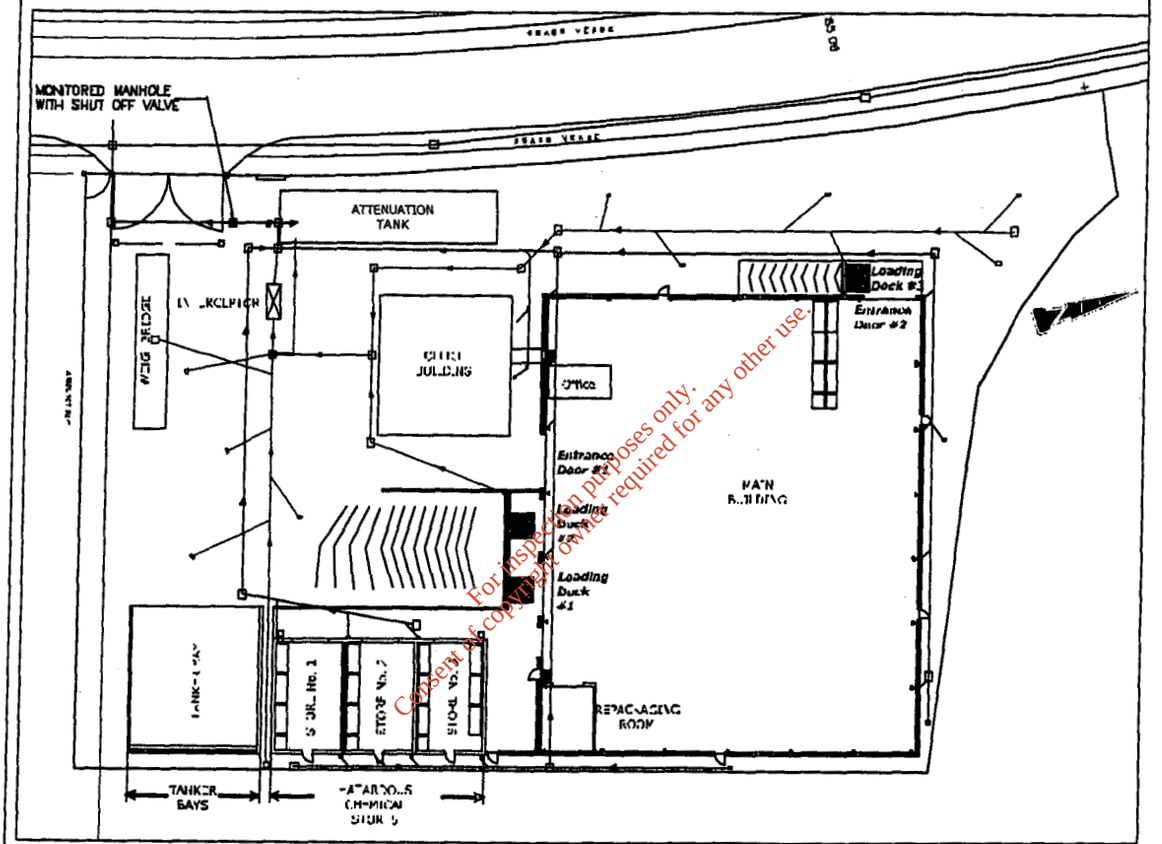

Figure 1: Facilty Layout

7.0 Operations

During operational hours the facility is manned by Cara personnel and outside these hours a by contract security firm, which manages the business park. All wastes delivered to the facility pass over the weighbridge. Those wastes intended for processing and repacking on-site are directed to the Warehouse, where all processing and waste repackaging is carried out. This building is provided with full spill containment. There are waste inspection and waste quarantine areas and dedicated storage areas for the processed non-hazardous waste (e.g. plastic, paper metals) inside the building.

The processing and repacking that may be carried out in the building includes:

- shredding, baling and drumming
- manual dismantling of waste electrical items
- manual removal of components of certain waste items
- bulking of compatible liquids into drums

The properties of the waste materials determine the manner in which they are handled and stored. The definition of hazardous waste applied for waste management purposes is insufficient to identify the hazards associated with particular materials. Information, such as that contained in material safety data sheets (MSDS), provides more detail on the hazards associated with that particular material and the appropriate handling and storage requirements.

The international norm or standard for classifying materials utilises a grouping process based on the hazardous properties of the material. This approach, which is described in the **UN Storage of Hazardous Materials – a Technical Guide for Safe Warehousing of Hazardous Materials** and the UK Health an Safety Executive's document **Chemical Warehousing – the storage of packaged dangerous substances**, is applied at the facility

Hazardous wastes (meeting Dangerous Goods classification criteria) stored on-site pending removal for off-site treatment or disposal are stored in the Hazardous Chemical Store. This has three separate compartments and is provided with full spill containment. Hazardous waste delivered to the facility in road going tankers and ISO tanks are stored in a covered Tanker Bay area, which is provided with full spill containment. There is no external handling or processing of waste and, with the exception of the covered Tanker Bay, there is no external storage of wastes.

The facility design incorporates full spill containment for all areas where wastes are handled, processed and stored. The Hazardous Chemical Store is provided with an underground reinforced concrete tank with a total capacity of $300m^3$.

The Tanker Bay is constructed of reinforced concrete and has a storage capacity of $31m^3$, with an overflow facility to the adjacent storage tank beneath the Hazardous Chemical Store.

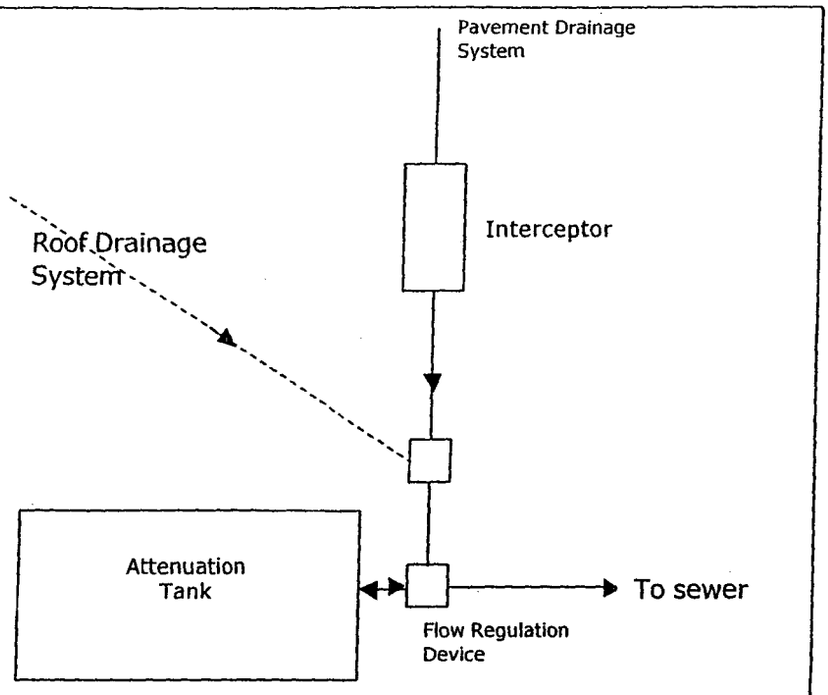

Figure 2: Surface Water Drainage System Control

The Warehouse is provided with a reinforced concrete containment kerb around the entire building, with ramps at the entrances, that provides an internal storage capacity of 225m^3.

A separate surface and foul water drainage system is provided on the facility premises. Surface run-off from the paved yard areas and the weighbridge is collected and directed to the on-site attenuation tank via a Class 1 interceptor. Run-off from building roofs drains directly to the attenuation tank, which, in turn, drains to the surface water sewer.

The facility surface water discharge flow is regulated by a hydrobrake and there is an electrically and manually activated shut off valve between the hydrobrake and the connection to the sewer. The valve is closed when the Emergency Response Procedure is activated.

Sanitary wastewater is discharged to the municipal foul sewer via the facility foul sewer. Floor wash water from the Warehouse is collected and directed to an underground reinforced concrete holding tank (5m^3). The wash water is tested to confirm its suitability in accordance with the licensed discharge parameters before it is discharged to the foul sewer.

A firewater retention assessment of the facility has concluded that the existing site design and layout provides more than adequate storage capacity for contaminated fire water run-off likely to be generated in fighting a major fire at the facility [reference Report on the Fire Precautions and the Design Criteria by R. Knox and Associates, dated 3/9/04].

8.0 Risk Assessment

For the purpose of the assessment an emergency is defined as fire; explosion; significant liquid spillage/leakage (>50 litres), uncontained vapour release and plant breakdown.

The extensive paving and the provision of appropriately sized and constructed spill containment measures in all waste handling and storage areas minimises the risk of short term direct or indirect discharges to ground or groundwater within the site boundary in the event of an emergency.

While there is the potential for unexpected releases of fuel and lubricating oils from vehicles in the parking areas the risk of a significant release is negligible. All the parking areas are paved and run-off from these areas passes through an oil interceptor before it enters the surface water attenuation tank. This effectively eliminates the risk of release of oil contaminated water from the facility in the event of a minor leak in the parking areas.

The review of the facility location, layout and operations presented in Sections 5-7 has identified four areas where there is the potential for an emergency to arise which could impact on the surface water and air quality both within the facility boundary and on adjoining properties. The four areas are:

- The Tanker Bay
- Hazardous Chemical Store
- Warehouse
- Offices

8.1 Tanker Bay

Bulk road tankers will be parked at the facility on an overnight or transit storage basis in the designated Tanker Bay. No material or liquid handling operations will be carried out while the tankers are at the facility. The potential risks associated with this activity, the causes and the response actions required are presented in Table 1.

Table 1: Tanker Bay

Risk	Cause	Response	Observations
Spillage	Leak from open or defective valve or damaged tank body Leak from vehicle engine / fuel tank	Contain spillage in bund Suppress vapours, if any Dispose of liquid properly	Bund capacity, design and construction is appropriate for the containment of spilled liquid ADR rated tankers
Fire/ Explosion	Flammable liquid spill and ignition source	Remove adjacent tankers Contain fire & suppress Apply coolant water Dispose of contained firewater properly	Appropriately rated electrical equipment has been installed No smoking allowed in this area ADR RATED TANKERS – flammable liquid rated tankers for flammable liquids
Vapour Ignition	Vapour release and Ignition Source	Remove adjacent tankers Contain fire & suppress Apply coolant water Dispose of contained firewater properly	Appropriately rated electrical equipment has been installed No smoking allowed in this area ADR Rated tankers Tankers earthed during loading/unloading

The probability of these incidents occurring is low, as

- there is no handling or processing of the liquids in this area,
- the sides of the Tanker Bay are open which prevents the accumulation of vapours and
- the only potential ignition sources are the diesel engine vehicles. The tankers are ADR certified and routinely inspected

The probability of significant environmental impact is low given the facility design and location. Appropriately rated electrical and atmospheric monitoring devices are installed in the tanker bay. Furthermore to minimise the risk of adverse environmental impact associated with an incident and in addition to the measures incorporated into the facility design the following operational measures apply.

Appropriate training is provided to personnel on:

- Dealing with chemical accidents and spillages
- Basic fire-fighting

The tankers are clearly labelled as to their contents to ensure appropriate containment and fire-fighting techniques are applied in accordance with Carriage of Dangerous Goods Regulations.
Maintenance of appropriate spill clean-up and fire fighting equipment locally.
Routine verification of bund integrity
The road tankers are UN approved for the Carriage of Dangerous Goods

8.2 Hazardous Chemical Store

The Hazardous Chemical Store incorporates three (3) separate compartments separated from the main warehouse building. The handling and storage of hazardous chemicals gives rise to the potential that mixing of incompatible materials may generate a number of reactions, which could include:
A fire / explosion through the generation of an exothermic reaction / volatile reaction products.
The generation of fumes or vapours that may be hazardous, e.g. toxic or corrosive.
The generation of reaction by-products that may be hazardous, e.g. toxic or corrosive.

The Hazardous Chemical Store is designed to allow the safe storage of incompatible materials. Furthermore the storage activities are carried out in accordance with:

- the Conditions in the Waste Licence
- the HSE Chemical Warehousing Guide;
- in accordance with information contained within the different material MSDS; and,
- on the segregation requirements required by the International Maritime Dangerous Goods Code for marine transport of dangerous goods.

This multi-layered approach to chemical storage generates a high degree of control in the segregation of incompatible chemicals. In addition to the onsite physical segregation of materials and the storage practices applied, the wastes will be assessed for onsite storage suitability at the time a booking enquiry is received from a customer. Waste profiling at this stage will ensure that material, which cannot be stored on site at that time due to the presence of other incompatible materials on site, will not be accepted, until such time as sufficient space in a suitable storage area becomes available though the movement of materials off site or the reorganisation of material presently on site.

The probability that incompatible chemicals will come into contact with each other in the building is extremely low, given that for this to occur more than one chemical container has to release its contents into the same area at the same time. The physical inspection of waste containers before their acceptance onto site and the daily checks on material already stored in the building will minimise the risk that a leaking container will be taken onto site or will remain undiscovered on site for any period of time. Furthermore the requirement to store dangerous goods in UN Approved and tested containers gives a significantly high degree of confidence in the integrity of undamaged and properly stored containers.

The potential for physical damage to containers on site is limited through the use of trained forklift / pallet truck operators to move material around the site. Incompatible materials will not be carried on the same forklift or pallet truck load during movement onsite, so that in the event of an incident, for example the loss of a forklift load, causing the damage of more than one container, all material released will be compatible and thus not generate any hazardous reactions.

Within the Hazardous Chemical Store the storage of incompatible materials in accordance with the provisions detailed above will mean that in the event of a major incident in an area, the chances that two containers of incompatible material being damaged at the same time is minimal, due to the fact that they will be separated by a wall or the requisite distance (3m) in accordance with the requirements of the above documents. In the event that this low probability scenario does occur, then facility personnel have been trained to deal with these situations through the use of appropriate fire fighting responses, spill control materials or other treatment procedures.

In the event of a major incident on site, i.e. a fire or explosion, the probability that incompatible material will mix is increased. However, the products of mixing of incompatible materials will be broadly similar to those produced by the fire or explosion, and in this case the standard fire fighting procedure on site will deal with these issues.

The potential for incompatible material to mix within the underground bund under the Hazardous Chemical Store is also low. All racking systems within the stores are bunded to greater than 25% of the total volume of material stored in the above rack; and a volume also greater than the volume of any single container above them; so in the event of a spill from container the material lost will be contained within the racking bund and not be lost to the underground bund. All material stored above a racking bund will be compatible, so that in the event of a major incident in a rack all material lost will be of a compatible nature. Racking bunds will be tested for integrity in a regular basis.

The only foreseeable situation that will result in the large scale release of materials are fire and catastrophic failure of a racking system. The former has been dealt with above, whilst the latter scenario is of an extremely low probability. To address this low risk all racking will be inspected on a regular basis for structural integrity.

The potential risks associated with this activity, the causes and the response actions required are presented in Table 2. These include for unexpected releases in the event of plant breakdown.

Table 2 Hazardous Chemical Stores

Risk	Cause	Response	Observations
Spillage	Leakage from defective containers	Spillage contained in storage tank suppress vapours, if any dispose of contained liquid properly	Storage tank construction and capacity is compatible with containment of spilled liquid. The stores are vented. Waste stored in UN Approved containers Acceptance procedures
Fire/Explosion	Spill of Flammable liquid and ignition source Mix of incompatible materials	Contain fire & suppress Dispose of contained firewater properly	Install appropriately rated electrical equipment Design of stores LEL Detectors L1 Fire Detection Coverage Fire fighting material on site
Vapour Release	Mix of incompatible materials	Suppress vapours	The stores are vented
Vapour Ignition	Vapour release and ignition source	Contain fire and suppress Dispose of contained firewater properly	Air quality and temperature is monitored using appropriately rated equipment. UN Approved containers Acceptance procedures. LEL Detectors

The probability of these incidents occurring is low given the design and procedural controls on waste acceptance and handling on site, as there is no processing of the wastes in this building and wastes are only stored. Waste is inspected before entering storage and thereafter on a routine basis. Appropriately rated electrical and atmospheric monitoring devices are installed in this area. The underground tank is also fitted with smoke and LEL detectors.

To further minimise the risk of adverse environmental impact associated with an incident and in addition to the measures incorporated into the facility design the following operational measures apply:

- Appropriate training is provided to personnel on dealing with chemical accidents and spillages
- Appropriate training is provided to personnel on basic fire-fighting
- The racking system will be visually inspected on a regular basis for structural integrity.
- There will be planned maintenance of appropriate spill clean up and fire fighting equipment locally.
- Notices of the contents of the various store are located external to the each compartment to ensue that the appropriate spill containment and fire fighting techniques are applied.
- Routine verification of racking bund integrity will be undertaken.

8.3 Warehouse

All materials received at the facility pass through the Waste Inspection Area inside this building. Waste processing, repackaging and the storage of non-hazardous wastes are carried out. The materials processed and stored in the building, such as paper, plastics and cardboard, while non-hazardous, are capable of supporting combustion.

The bulking of small quantities of hazardous materials, including flammable liquids, will also carried out in the building with the bulked up materials transferred to the Hazardous Chemical Store. The building is fitted with racking systems and electro-mechanical and electro-hydraulic plant.

The probability that incompatible chemicals will come into contact with each other in the building is extremely low, given that for this to occur more than one chemical container has to release its contents into the same area at the same time. The physical inspection of waste containers before their acceptance onto site will minimise the risk that a leaking container will be taken onto site.

The potential for physical damage to containers is limited through the use of trained forklift / pallet truck operators to move material around the site. Incompatible materials will not be carried on the same forklift or pallet truck load during movement onsite, so that in the event of an incident, for example the loss of a forklift load, causing the damage of more than one container, all material released will be compatible and thus not generate any hazardous reactions.

In the event of a major incident on site, i.e. a fire or explosion, the probability that incompatible material will mix is increased. However, the volume of hazardous materials in the warehouse at any one time will be small as only bulking of materials will be carried out and all bulked materials will be stored in the Hazardous Chemical Store. The products of mixing of incompatible materials will be broadly similar to those produced by the fire or explosion, and in this case the standard fire fighting procedure on site will deal with these issues

The potential risks associated with the activities carried out, the causes and the response actions required are presented in Table 3. These include for unexpected releases in the event of plant breakdown.

Table 3 Warehouse

Risk	Cause	Response	Observations
Spillage	leakage from defective containers	Contain spillage internally suppress vapours, if any Dispose of contained liquid properly	Containment design and capacity is appropriate for the types and volumes of materials processed and stored.
Spillage and Fire	Spillage of flammable liquid and ignition source	Contain fire and suppress. Dispose of contained firewater properly	Appropriately rated electrical equipment installed L1 fire coverage.
Vapour ignition	Vapour release and ignition	Contain fire and suppress Dispose of contained firewater properly	Internal air quality and temperature monitored using appropriately rated equipment.
Combustion of solid flammable material	Ignition Source	Isolate risky activities: Minimise quantity of waste stored Contain fire and suppress Dispose of contained firewater properly	Regular inspections of the storage areas carried out to identify potential ignition sources
Motor fire	Overheating Electrical fault	Preventative maintenance programme Dispose of contained firewater properly	
Electrical Fire	Electrical fault	Preventative maintenance programme Dispose of contained firewater properly	All electrical equipment certified

The level of risk of these incidents occurring is medium. The level of risk of significant environmental impact is low given the facility design and location. To further minimise the risk of adverse environmental impact associated with an incident and in addition to the measures incorporated into the facility design the following operational measures apply.

1. Appropriate training is provided to personnel on:
   - dealing with chemical accidents and spillages and
   - basic fire-fighting

2. The underground collection tank is inspected and monitored on a routine basis prior to the discharge of wash water to the municipal foul sewer.
3. Maintenance of appropriate spill clean up and fire fighting equipment locally.
4. Routine verification of storage tank integrity.

9.0 Training & Distribution

This procedure is a key element of the Environmental Management System for the facility. The Facility Manager and nominated Deputy must maintain copies of this procedure.

10.0Referenced Documents

No.	Reference	Location

11.0Reason for Revision

This is a draft procedure

12.0Approval

This procedure is approved and forms part of the Greenogue Management System and policies.

Operations Director Date:_____

Facility Manager Date:_____