

ANNUAL ENVIRONMENTAL REPORT

2008

for

WALLACE RECYCLING LTD,

UNIT 16/17 MULLINGAR BUSINESS PARK, MULLINGAR,

CO. WESTMEATH

WASTE LICENCE REGISTER NO: W0197-01

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A. INTRODUCTION:

This is the third annual environmental report for Wallace Recycling Ltd, Unit 16/17 Mullingar Business Park, Mullingar, Co. Westmeath in relation to the Waste Licence WO197-01 issued on 14th September 2005. This report covers the twelve months of the calendar year for 2008.

The Wallace Recycling Facility is located in an Industrial area of Mullingar Business Park, Co. Westmeath. Michael & Linda Wallace have successfully operated Wallace Recycling Ltd at the current site since 2000. The licensed area now encompasses approximately 2.00 acres.

Wallace Recycling Ltd is the only EPA waste licensed facility in County Westmeath; as such it is a key facility in terms of compliance with the requirements of the Waste Management Plan for the Midlands region. Wallace Recycling provide waste management and recycling services to most of County Westmeath.

Wallace Recycling have continually improved their waste and recycling facility through the introduction of new plant, IT facilities, buildings and the provision of a civic amenity area to facilitate the public when the nearby Marlinstown facility closed at the start of 2007.

The content of the AER is based on Schedule F of the Waste Licence and the report format follows guidelines set in the “Guidance Note for Annual Environmental Report” issued by the Environmental Protection Agency.

The original Waste Licence allowed Wallace Recycling Ltd to accept Household, Commercial & Industrial and Construction & Demolition non-hazardous waste on-site between the hours of 08:30 to 17:30 Monday to Saturday inclusive. The various waste streams are processed and stored on-site pending removal to authorised off-site recycling and disposal facilities. The annual waste throughput is limited to 50,000 tonnes.

Waste is mechanically sorted and segregated via a Trommel and semi automatic picking line; larger items are picked by hand. Sorted recyclable material is further processed at the facility i.e. shredded or baled prior to being transported off-site for recovery.

Non-recyclable waste is stored on site prior to being transported off-site for disposal at licensed facilities.

Wallace Recycling Ltd services include:

- Mini, Standard, Open/Closed Skip Hire;
- Roll-on, Roll-off Skip Hire;
- Domestic Tag-A-Bin refuse/recycling kerbside collection;
- Recycling (Bags) Kerbside collection;
- Commercial & Industrial Bin collections;
- Office Recycling collections;
- A centrally located one-stop-shop waste transfer station.

B. TECHNICAL AMENDMENT & OTHER CHANGES:

A Technical Amendment was approved in 2007, along with some other changes which allow for the following amendments to the Waste Licence WO-197-01:

1. Extension of site boundary:

The adjacent facility is used to store empty waste receptacles, containers full of recyclables awaiting collection, containers of green waste, glass, white goods etc and for additional staff car parking. The use of the adjacent facility for storage of skips, waste and private vehicles will improve our overall capacity, facilitate better utilisation of the existing facility through improved housekeeping and ensure a safer working environment for all concerned.

2. Extension of opening hours:

The granted extension of hours is as follows:

“Waste shall be accepted at the facility only between the hours of 07:30 to 19:00 Monday to Saturday inclusive.

The facility shall be operated only during the hours of 07:00 to 23:00 Monday to Saturday inclusive.”

3. Acceptance of ELVs

In December 2007 the EPA sent documentation confirming that Wallace Recycling is an Authorised Treatment Facility (ATF) for End of Life Vehicles.

4. Effluent Monitoring Frequency

The frequency of monitoring of COD, BOD, Suspended Solids, Oils, Fats & Greases and DRO were seen by Wallace Recycling Ltd as particularly onerous. Having reviewed a selection of IPC licences available on the EPA website, the normal frequency for monitoring of water emissions would appear to be quarterly.

This has been highlighted and discussed with the EPA Inspectors on a number of occasions and was also raised as a non-conformance during an EPA audit (W0197-01)06AR01LOS carried out on 13th November 2006. A schedule for testing of the sewer emissions on a weekly basis was agreed during this audit and the results of this sampling are shown in Table 3.2 below.

On the 26th February 2007 correspondence was sent to the EPA Inspector requesting a review of the frequency of sewer emission monitoring. A meeting was held with two members of the EPA enforcement section on 22nd March 2007 to progress this issue.




A change to the effluent sampling frequency was granted, allowing for sampling to take place once per annum for all parameters.

OTHER CHANGES:

A full Waste Licence review is being prepared. This includes requests for the processing of waste on the adjacent site, increases to the overall tonnage volumes and to introduce additional waste streams.

During 2007 there were a number of resource issues due mainly to staff turnover which included a key member of the management team. Wallace Recycling has been actively recruiting to fill the position of General Manager which was vacated at the start of July 2007.

C. ENVIRONMENTAL POLICY STATEMENT



Unit 18/17, Mullingar Business Park,
Mullingar, Co. Westmeath
Tel: 044-47177 Fax: 044-34795
Email: wallacerecycling@eircom.net
Website: www.wallacerecycling.com

Commercial & Domestic: Wheelie Bin Service,
Skip Hire, Waste Management
& Recycling Specialists

ENVIRONMENTAL POLICY STATEMENT

Wallace Recycling Ltd is a recycling and waste management company. Established in 1995, the company is a market leader in providing waste collection and recycling services to domestic, industrial and commercial clients. Wallace Recycling Ltd operate a waste transfer and recycling facility at Mullingar Business Park, Mullingar, Co Westmeath. This site provides facilities for handling and recycling wastes from a wide range of sources.


Wallace Recycling Ltd operations have a positive environmental impact and help Irish households and industry to effectively manage and recycle their wastes. However, we are aware of the need to reduce the environmental impact of waste disposal and the over-reliance of landfill as a waste disposal option.

Consequently, Wallace Recycling Ltd regard recycling, waste minimisation and environmental protection as an ongoing and essential part of our business. We will therefore take all reasonable steps to assist our clients to reduce the quantities of waste disposal to landfill and ensure that our own operations do not have a negative impact on the environment.

Wallace Recycling Ltd will strive to meet these commitments by:

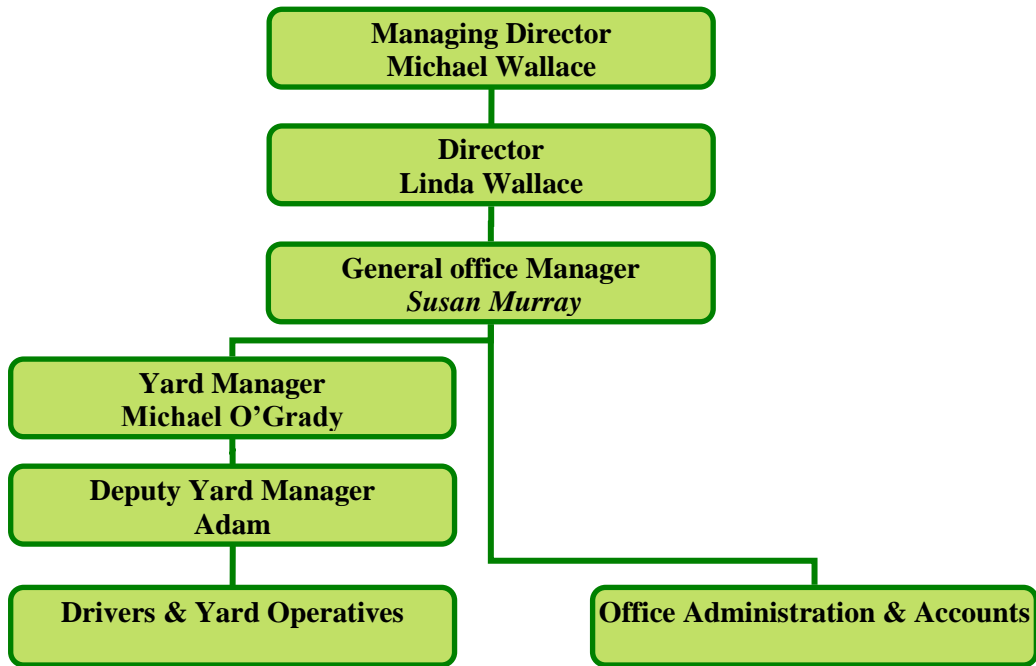
- conforming to relevant environmental standards, licences and legislation relating to our business,
- continually improving our operations by setting and reviewing environmental objectives and targets,
- preventing pollution from our transfer and recycling facility by monitoring and assessing our activities and emissions,
- reviewing options to recycle waste and divert from landfill disposal,
- assisting our clients to segregate and make their wastes available for recycling,
- communicating our environmental policy to all employees and ensuring that they have the knowledge, resources and authority to implement this policy,
- ensuring that the proper managerial, technical and administrative controls shall operate in order to enable this policy to be maintained at all levels,
- making our environmental policy available to the public and interested parties.

Whilst all Wallace Recycling Ltd employees have a duty to ensure that our operations do not cause environmental pollution, the overall responsibility for environmental protection lies with the Managing Director.

Signed: 
Michael Wallace
Managing Director
Wallace Recycling Ltd Date: January 2005

Directors: M. Wallace & L. Wallace Printed on Recycled Paper

D. WALLACE RECYCLING ORGANISATIONAL CHART



1. SUMMARY INFORMATION

EMISSIONS FROM FACILITY

Wallace Recycling Ltd implements an environmental monitoring programme to assess the significance of emissions from our facility activities. The programme includes dust monitoring, emissions to sewer and noise monitoring. The monitoring locations are shown on Drawing No. Map J.1 Site Monitoring Locations in Appendix 1.

An overview of the results of the monitoring is presented in this section, with summary data in tables also included. The results are discussed in the context of the impact of the emissions on the environment and compared with available data on background and/or ambient conditions.

1.1 Dust Monitoring

Wallace Recycling Ltd is required to conduct quarterly dust monitoring using the Bergerhoff method at three on-site locations (DS-1, DS-2 and DS-3). The licence requirement to monitor dust on a quarterly basis was not met as monitoring fell behind schedule. A programme has been put in place to ensure dust levels are monitored each quarter as required in 2008; Oldcastle Laboratory, Oldcastle, Co. Meath will be performing the analysis on these samples. The monitoring conducted for dust in 2008 showed that the dust deposition limit (350 mg/m³/day) was not exceeded at any of the monitoring locations. The results of the dust monitoring performed are included in Table 1.1 below.

Table 1.1 Results of Dust Monitoring 2008:

Licence Limit mg/m ³ /day	Sampling location	Jan-Mar 07 mg/m ³ /d
350	D1	14.4
350	D2	31.3
350	D3	16.3

30 day composite sample with the results expressed as mg/m³ /day.

1.2 Emissions to Sewer Monitoring

These samples are taken from the locations EF1, EF2 and EF3.

Schedule C C.3.2 Monitoring of Emissions to Sewer states that the following parameters must be monitored:

Volume to be emitted: Maximum in any 1 day: 10m³; Maximum rate per hour: 5m³

<i>Parameter</i>	<i>Monitoring Frequency</i>	<i>Analysis Method/ Technique</i>
<i>Flow</i>	<i>Annual</i>	<i>On-line flow meter with recorder</i>
<i>Temperature</i>	<i>Annual</i>	<i>On-line temperature probe with recorder</i>
<i>pH</i>	<i>Annual</i>	<i>pH electrode/meter and recorder</i>
<i>Chemical Oxygen Demand</i>	<i>Annual</i>	<i>Standard method</i>
<i>Biochemical Oxygen Demand</i>	<i>Annual</i>	<i>Standard method</i>
<i>Suspended Solids</i>	<i>Annual</i>	<i>Gravimetric</i>
<i>Oils, Fats & Greases</i>	<i>Annual</i>	<i>Standard method</i>
<i>Diesel Range Organics</i>	<i>Annual</i>	<i>Standard method</i>

The frequency of monitoring of COD, BOD, Suspended Solids, Oils, Fats & Greases and DRO are seen by Wallace Recycling Ltd as particularly onerous. Having reviewed a number of IPC licences available on the EPA website, the normal frequency for monitoring of water emissions would appear to be quarterly.

This has been highlighted and discussed with the EPA Inspectors on a number of occasions and was also raised as a non-conformance during an EPA audit (W0197-01)06AR01LOS carried out on 13th November 2006. A schedule for testing of the sewer emissions on a weekly basis was agreed during this audit.

On the 26th February 2007 correspondence was sent to the EPA Inspector requesting a review of the frequency of sewer emission monitoring. A meeting was held with two members of the EPA enforcement section on 22nd March 2007 to progress this issue. A change to the effluent sampling frequency has been granted, allowing for sampling to take place once per annum for all parameters.

Emissions to Sewer monitoring were not performed in 2008. Quotations are currently being sought to have Sewer monitoring done in summer 2009.

1.3 Noise Monitoring

Noise monitoring survey was not performed in 2008. However Noise Monitoring has been completed in January 2009, results to be included in 2009 annual environmental report.

2. WASTE MANAGEMENT ACTIVITIES

The EPA Waste Licence allows Wallace Recycling Ltd to accept and process on-site for recovery and disposal, 50,000 tonnes of waste per annum, comprising commercial/industrial non-hazardous waste, household waste and construction & demolition wastes. Waste processing takes place inside the waste transfer station building.

2.1 Waste Types

The facility is licensed to accept the following waste types as specified in Part 1 Schedule of Activities Licensed the Waste Licence: -

- Household,
- Commercial & Industrial,
- Construction & Demolition.

Hazardous waste is not accepted at the facility, with the exception of small quantities of that which inadvertently arrive in waste deliveries, for example batteries. Any materials suspected either to be hazardous or not acceptable under licence conditions (e.g. gas cylinders, chemical drums etc) are temporarily stored on-site in the waste quarantine area, before removal off-site for treatment/disposal at an appropriate facility.

A copy of the list of current authorised facilities used for waste disposal and recycling is included in Appendix 2 - Recycling & Disposal Schedule.

Household, Commercial & Industrial Waste Containing Putrescible Materials

Household, commercial & industrial wastes (originating in factories, hotels, pubs and supermarkets) containing an organic fraction are either deposited on the floor of the transfer building, or tipped directly into open trailers. All the household waste deposited on the floor is either pushed into an open trailer, or compacted for removal off-site for disposal at an off-site landfill, as agreed with the Agency.

Industrial & commercial waste is inspected and segregated into recyclables and non-recyclables. All uncontaminated cardboard and plastic packaging material, which is suitable for baling, is collected for recycling or delivered to authorised recyclers. Tin cans are collected, baled and stored on-site pending removal off-site for recycling. Glass bottles, which are either segregated prior to arrival on-site or deposited at the civic amenity area, are stored on-site pending removal for recycling off-site.

Non Putrescible Household and Commercial Waste

Non putrescible household wastes, arising from the kerbside collection, and non-putrescible commercial/industrial waste is deposited onto the floor of the transfer building and inspected for disposable and/or recoverable fractions. Nonrecyclable/recoverable wastes are stored within the building before transfer for disposal to an off-site landfill, as agreed with the Agency.

Construction and Demolition Waste

All construction and demolition waste is inspected to determine if it is suitable for transfer and/or recovery. Wood and metal are separated using a mechanical grab and

subsequently removed off-site to approved recovery/recycling facilities. The residual material is passed through a trommel to remove the fine fraction containing subsoil and topsoil. This material is sent for inert landfilling.

Wood, Timber and Green Waste

Wood and timber delivered to and recovered on-site is collected and removed off-site for disposal. Green waste delivered to the facility is stored pending transfer to an offsite composting facility.

Civic Amenity Facilities

There are a number of containers located at the facility, which are provided for use by the general public for deposition of household waste and recyclables including plastic, timber, cans, glass, metals and textiles. The materials collected in these are removed off-site for recovery/recycling.

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2.2 Waste Management Record For 2008

In order to improve our data collection systems, Wallace Recycling introduced a new software system in November 2007. During the transfer of weighbridge data from the old system to the new system some information was not transferred correctly and as a result some of the figures below had to be based on estimates while the majority of figures are accurate.

WASTE TYPE	METHOD OF QUANTITY ASSESSMENT	Waste acceptance on-site i.e. total quantity handled (collected & delivered)		OFF-SITE RECYCLING - Quantities sent off-site			OFF-SITE DISPOSAL (TONNES)		
		Qty generated in RoI (T)	Qty generated abroad & imported in RoI (T)	Quantity recycled by third party (T)	Name and location of third party recycler	Recovery op. to which waste is subjected by 3 rd party as per R codes TFS Regs	Non-recyclables disposed from your site (T)	Name of landfill/destination to which the waste is disposed	Disposal operation to which waste is subjected by <u>third party</u> according to D codes in TFS Regulation
MIXED WASTE STREAMS									
Mixed residual waste 20 03 01	Weighbridge	19771.20					3135.64	Derriclure landfill	D1 - Landfill
				39.86	Greyhound recycling	R5 Inorganic substance recycling			
							8162.44	Oxigen Dundalk Landfill	
							1193.39	Oxigen Robin hood	D1 - Landfill
						879.36	Corranure Landfill	D1 - Landfill	
Mixed Dry Recyclables 20 03 01	Weighbridge	568.61		124.78	Clearpoint Recycling	R5 - Inorganic substance recycling			
				258.56	Greyhound waste	R5 - Inorganic substance recycling			
				138.00	Oxigen environmental	R5 - Inorganic substance recycling			
				13.90	Smurfit	R5 - Inorganic substance recycling			
BIODEGRADABLE MUNICIPAL WASTE									
Garden & Park Waste 20 02 01	Weighbridge	66.48					89.04	Derriclure Landfill	D1 Landfill
PAPER & CARDBOARD PACKAGING									

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Cardboard packaging & paper packaging 15 01 01	Weighbridge	374.50		236.16	Smurfit Recycling Dublin	R3 - Organic Substance Recycling		
				680.22	Greyhound recycling	R3 - Organic Substance Recycling		

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2.2 Waste Management Record For 2008 continued:

WASTE TYPE	METHOD OF QUANTITY ASSESSMENT	Waste acceptance on-site i.e. total quantity handled (collected & delivered)		OFF-SITE RECYCLING - Quantities sent off-site			OFF-SITE DISPOSAL (TONNES)		
		Qty generated in RoI (T)	Qty generated abroad & imported in RoI (T)	Quantity recycled by third party (T)	Name and location of third party recycler	Recovery op. to which waste is subjected by 3 rd party as per R codes TFS Regs	Non-recyclables disposed from your site (T)	Name of landfill/destination to which the waste is disposed	Disposal operation to which waste is subjected by third party according to D codes in TFS Regulation
TEXTILE NON-PACKAGING									
Textile waste from municipal sources. 20 01 10 / 20 01 11	Weighbridge	1.28		1.28	Textile Recycling Ltd, Tallaght	R13 - Storage prior to recovery			
PLASTIC PACKAGING									
Plastic bottles jars e.g., PVC, PET and PE containers, supermarket bags, refuse bags, plastic wrappers for food 15 01 02	Weighbridge	28.96		11.14	Smurfit	R5 - Inorganic substance recycling			
				103.04	Greyhound Recycling Dublin	R5 - Inorganic substance recycling			
				66.78	Leinster Environmental	R5 - Inorganic substance recycling			
GLASS NON-PACKAGING									
Glass from municipal sources(Non-packaging)	Weighbridge	86.48		68.40	Mullingar Action Group, Mullingar	R13 - Storage prior to recovery			
WOOD PACKAGING & NON-PACKAGING									
Wood from C&D waste 17 02 01	Estimate	532.84		508.00	Conroy Recycling Mullingar	R13 - Storage prior to recovery			
						R13 - Storage prior to recovery			
				552.02	Oxigen Cavan	R13 - Storage prior to recovery			
				39.42	Oxigen Dundalk	R13 Storage prior to recovery			

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OTHER NON-PACKAGING MATERIALS										
Lead batteries 16 06 01	Weighbridge			9.44	ReturnBatt, Kill, Co. Kildare	R13 - Storage prior to recovery				

2.2 Waste Management Record For 2008 continued:

WASTE TYPE	METHOD OF QUANTITY ASSESSMENT	Waste acceptance on-site i.e. total quantity handled (collected & delivered)		OFF-SITE RECYCLING - Quantities sent off-site			OFF-SITE DISPOSAL (TONNES)		
		Qty generated in RoI (T)	Qty generated abroad & imported in RoI (T)	Quantity recycled by third party (T)	Name and location of third party recycler	Recovery op. to which waste is subjected by 3 rd party as per R codes TFS Regs	Non-recyclables disposed from your site (T)	Name of landfill/destination to which the waste is disposed	Disposal operation to which waste is subjected by third party according to D codes in TFS Regulation
WEEE									
White goods 16 02 14 / 20 01 36	Weighbridge	38.94		3.98	TechRec, Parkwest	R13 - Storage prior to recovery			
FERROUS METALS (non packaging):									
End of life vehicles (not de-polluted) 16 01 04	Estimate	2.42		12.48	Hammond Lane Athlone	R4 - Metal recovery			
Mixed metals from C&D waste 17 04 07	Weighbridge	219.18		51.90	A1 recyclers	R4 - Metal recovery			
				529.21	Erin recyclers	R4 - Metal recovery			
				113.86	Hammond Lane	R4 - Metal recovery			
Metals separated from municipal, household and commercial waste 20 01 40	Estimate			24.76	A1 Recycling Mountmellick	R4 - Metal recovery			
				129.43	Hammond Lane Athlone	R4 - Metal recovery			
				408.67	Erin Recyclers	R4 - Metal recovery			
NON-FERROUS METALS (non packaging):									
Copper, brass, bronze from C&D waste 17 04 01	Weighbridge	10.54		25.20	A1 Recycling Mountmellick	R4 - Metal recovery			

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2.2 Waste Management Record For 2008 continued:

WASTE TYPE	METHOD OF QUANTITY ASSESSMENT	Waste acceptance on-site i.e. total quantity handled (collected & delivered)		OFF-SITE RECYCLING - Quantities sent off-site			OFF-SITE DISPOSAL (TONNES)		
		Qty generated in RoI (T)	Qty generated abroad & imported in RoI (T)	Quantity recycled by third party (T)	Name and location of third party recycler	Recovery op. to which waste is subjected by 3 rd party as per R codes TFS Regs	Non-recyclables disposed from your site (T)	Name of landfill/destination to which the waste is disposed	Disposal operation to which waste is subjected by third party according to D codes in TFS Regulation
OTHER (Materials not included above)									
Gypsum-based construction materials 17 08 02	Estimate	102.70		38.72	Gypsum Recycling Irel Ltd, Sandyford Dublin 8	R5 - Inorganic substance recycling			
				22.10	Concrete Recycling Specialists	R5 - Inorganic substance recycling			
Sawdust, shavings, cuttings, wood, particle board & veneer 03 01 05	Weighbridge	5.00				R5 - Inorganic substance recycling			
Soil and stones other than those mentioned in 17 06 03. 17 05 04	weighbridge	958.82		539.04	Finns Mullingar	R10 - Landspreading			
				3299.66	Ballinagore Site	R10 - Landspreading	253.26	Derryclure Landfill	D1 Landfill
Street cleaning residue 20 03 03	Weighbridge	1032.17							

3. RESOURCE CONSUMPTION SUMMARY

3.1 Energy consumption.

Energy at the facility is provided by electricity supplied by the ESB; there are no boilers or burners of other fuel types used on site.

Electricity usage for January to December 2008 based on consumption and cost reports from the ESB was 39.0% Megawatts, this shows an increase from 37.5% Megawatts used in 2007.

An Energy Efficiency Survey was completed in 2008 by PowerTherm Solutions to monitor the energy management system within the company. The audit highlighted energy consumption for the year 2007 and compared them to figures for 2006.

An objective has been set for 2009 to reduce the quantity of electricity used per tonne of waste processed by 5%, in order to identify how to achieve these levels of energy reduction a second energy audit is needed which will be organised before October 2009.

3.2 Water Consumption from Municipal Supply.

The water supplied to the site is via mains from the municipal supply managed by Westmeath County Council. Water is not used extensively in the waste transfer process itself; the main consumption of water on-site is through domestic usage, i.e. toilets and canteen, with a certain volume used for the wheel wash.

Westmeath County Council fitted a water meter in the past but it had been covered over and was inaccessible, this meter was made accessible for readings again in October 2006.

Based on the latest water meter reading information supplied by Westmeath County Council, the water usage in 2008 was 131m³.

4. ENVIRONMENTAL COMPLAINTS & ENVIRONMENTAL INCIDENTS SUMMARY

4.1 Environmental Complaints:

During 2008 there were no formal environmental complaints received from members of the public relating to the services provided by Wallace Recycling Ltd. A procedure is in place to deal with these issues should they arise, the objective being to establish the root cause of the complaint in order to prevent a recurrence.

4.2 Environmental Incidents:

All environmental incidents are recorded on the Incident Report Form; there were no formal incidents in 2008. There is a system in place to ensure that all incidents which could have an environmental impact are reported in writing to the EPA.

5. SCHEDULE OF OBJECTIVES & TARGETS AND EMP for 2008

EMP	Objective	Target	Responsibility	Timescale
1	Set a target to reduce energy usage on-site.	Have an energy audit of the facility completed as required by EPA licence.	M. Wallace/ PowerTherm	Completed
		Implement recommendations for energy improvements from audit report to reduce energy usage & costs.	M. Wallace/ E. Boles	Completed
2	Improve profitability of business through provision of additional services & enhanced layout.	Apply for a Waste Licence review to allow the extension of the waste processing processes onto the new site and include new processes such as timber/tyre shredding etc as well as increased tonnage.	M. Wallace/ A. Moog	In progress at present will be submitted a.s.a.p.
3	Facility resource management	Carry out bund, tank & container integrity tests for diesel tanks.	M. Wallace	Not completed due to resource issues.
4	Training & Development	Train Yard Manager/Assistant Yard Manager/ in an EPA recognised Waste Facility Operator course as run by FAS.	General Manager	Not completed due to resource issues. The yard managers could not be freed up. The MD has received this training and is on site.

EMP- Proposed for 2009

Objectives set for 2008 and 2009 were based on the SMART system: Specific, Measurable, Achievable, Realistic and with an agreed Timescale for completion. The objectives were chosen to maximise environmental benefit and the operating efficiency of the facility. These are outlined below:

EMP	Objective	Target	Responsibility	Timescale
1	Continual improvement of EMS & environmental compliance	Develop an internal audit schedule for all EMS processes & procedures.	A.cleary/E.Boles	Summer 2009
		Internal audits to be carried out throughout the year to ensure all processes/procedures are audited at least once per annum.	E. Boles/ A.cleary	21/12/07
		Corrective actions to be closed off in a timely manner & resources provided as required.	A.cleary L. Wallace/ M. Wallace	21/12/07
		Refresh all employees on procedures of EMS through training and participation in internal audits.	L. Wallace/ M. Wallace/ A.cleary	21/12/07
2	Facility resource management	Clearly mark all waste water, sewage and surface water gullies, drainage grids, interceptors and manhole covers with permanent paint.	M. Wallace	29/06/07
		Carry out bund, tank & container integrity testing for diesel tanks.	M. Wallace	31/05/07
3	Training & Development	Train Environmental Officer or Yard Manager in an EPA recognised Waste management course as run by FAS. Waste management course is due to commence in September 2009	M.Wallace	30/09/07

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EMP	Objective	Target	Responsibility	Timescale
4	Review and improve Documentation System	Review all documentation to ensure it is maintained, filed and up to date for inspection by an enforcement authority	A. Cleary	29/06/09
		System in place to make files more easily accessible.	A. Cleary	31/05/09
		Have soft copies of company information as an alternative to hard copies to reduce the quantity of paper within the company.	A.Cleary/ M.Wallace	30/10/2009
5	Organise for retraining of all weighbridge operators in relation to correct operation of the weighbridge	Improve weighbridge Software For improved accuracy of weighbridge records.	M.Wallace/ A.Cleary	21/12/09
		Organise for DMC to retrain all weighbridge operators	A. Cleary/ M.Wallace	21/12/2009
		Organise refresher training as required and training of new staff in relation to weighbridge operation.	M.Wallace/ A.Cleary	21/12/2009

7. POLLUTION EMISSION REGISTER.

Wallace Recycling Ltd has been informed by the EPA Inspector, that a Pollution Emission Register is not a requirement for a facility with a Waste Licence such as this.

8. DRAWING OF MONITORING LOCATIONS (IF AMENDED)

Monitoring locations are as per the original Waste Licence W0197-01 application. See Appendix 1 for map of monitoring locations.

9. TANK & PIPELINE TESTING & INSPECTION REPORT

Weekly in-house inspections are carried out of the interceptor, vehicle wash area and the drains at the main entrance and at Bays 1 & 2. The results and corrective actions required are recorded on the 'Weekly On Site Inspections' record. This system for inspection has been in place since 7th January 2005.

Tank & pipeline testing as required by Waste Licence Condition 3.11.5 and Schedule E have not been performed to date. These tests have been set to be completed in 2009.

10. ENERGY EFFICIENCY AUDIT REPORT SUMMARY

An energy audit was performed as required under Condition 7 of the Waste Licence. This was conducted by PowerTherm Solutions on 21st April 2008. Once this audit was completed a programme was developed to achieve energy and cost savings based on the recommendations made.

11. REPORT OF THE ASSESSMENT OF THE EFFICIENCY OF USE OF RAW MATERIALS IN PROCESSES & THE REDUCTION OF WASTE GENERATED

The reduction of wastes is a core part of the Wallace Recycling Ltd business ethos. Segregation systems are in place for the small quantities of waste generated as part of the Wallace Recycling Ltd office processes- segregation of office paper, cardboard and plastic plus the separation of domestic and canteen waste streams. The office recyclables are all processed with the other recyclables in the yard and sent for recycling with licensed waste contractors.

12. REPORT ON PROGRESS MADE & PROPOSALS BEING DEVELOPED TO MINIMISE WATER DEMAND & THE VOLUME OF TRADE EFFLUENT DISCHARGE

In 2006 a water tank was installed under the yard to gather rain water which will be used for the wheel wash. It is planned to install submersible pumps to complete this system in 2009. This will reduce the volumes of water used by the facility.

13. DEVELOPMENT/ INFRASTRUCTURE WORKS SUMMARY

(Planned for the current year 2009.)

Mr Michael Wallace purchased the 2.25 acre site which adjoins the current licensed facility. This increased the overall size of the facility to 3.25 acres, allowing extra space for improved storage, new waste streams and car parking.

Wallace Recycling prepared a Technical Amendment to the EPA Waste Licence in 2007 to allow for an extension of hours of operation and extension of the boundary to allow the new site to be used for storage of empty skips/ containers and for staff parking. The new site was set-up for use before the requests in the Technical Amendment were put into practice i.e. the new site will be levelled, paved, have drainage in place and security fencing.

A Waste Licence Review is planned to be submitted in 2009 to apply for increased tonnage, from 50,000 to 100,000 tonnes and introduce new waste processes e.g. purchase of a slow speed shredder to process tyres & timber etc.

14. REPORTS ON MANAGEMENT & STAFFING STRUCTURE OF THE FACILITY, AND A PROGRAMME FOR PUBLIC INFORMATION

An on-line form has been established on the Wallace Recycling Ltd website (http://www.wallacerecycling.com/complaint_feedback_form.htm) to allow members of the public to make a complaint or give feedback about any aspect of the services provided.

In 2008 Wallace Recycling Ltd recruited a General Manager to fill a new position created in Wallace Recycling Ltd. The General office Manager joined the company in March 2006 to manage the accounts and administration side of the business and proved an invaluable and effective addition to the business.

The General office Manager introduced the following in the first ten months on site:

- A manual audit trail system to allow full traceability of all waste movement into and out of the facility;
- System for effective scheduling of drivers;
- Systems for improvement in record keeping and accuracy of record keeping;
- Employee contracts;
- Revamp of front office/ weighbridge systems;
- New phone system;
- System for stock control;
- Preparation of in-house quarterly and annual audited management accounts.
- New Email System
- Staff meetings

In 2008, Wallace Recycling also recruited an environmental officer at the facility to deal with Environmental and Health and Safety issues that need addressing at the facility. The Environmental officer joined the company in November 2008. The Environmental officer introduced the following in the first 3 months of employment:

- Regular Health and Safety and Environmental Meetings
- More detailed inductions for all new members of staff
- Made changes to weighbridge EWC codes and waste descriptions for increased accuracy of waste movement.
- Increased staff awareness of Health and Safety and Environmental issues

- Housekeeping on site was made a priority
- Introduction of daily and weekly staff duties to improve appearance of site
- Daily Site Inspections
- Monthly audit reports.

Plans are in place for the Environmental officer to attend a FAS waste management course in 2009. Queries have been made and the next training course is due to commence in September 2009.

A new computerised system for auditing and traceability of waste movement tailored to the needs of Wallace Recycling Ltd has been installed and had been anticipated for completion end of September 2006, but due to resource issues it was installed in November 2007 and is now fully in place and working successfully.

15. REVIEW OF CLOSURE, RESTORATION & AFTERCARE MANAGEMENT PLAN

Wallace Recycling Ltd has operated from the existing facility since 2000. The company extended the site in 2007, with the purchase of the adjoining site, and as such we have no plans to close the facility or decommission the site.

However should operations cease at the site facility in the future, all machinery, plant and stock would either be relocated to an alternative site or sold off. All site wastes would be disposed off appropriately and the site left secured.

Wallace Recycling Ltd will render safe or remove from the site all materials, waste, plant or equipment that could result in a negative environmental impact.

Wallace Recycling Ltd will consider all reasonable requests from the EPA to deposit a security bond in the case of insolvency. This bond could be used to cover the cost of any site decommissioning required.

Aftercare Management Plan

The limited environmental risks associated with the activities at Wallace Recycling Ltd include fire and possible soil, groundwater and surface water contamination.

These limited risks only occur during site operations and Wallace Recycling Ltd do not propose to handle hazardous materials or store wastes on site for long periods of time or dispose of any wastes at the facility itself.

If operations were to cease, the potential environmental risks would be significantly reduced and there would be no expected long-term environmental effects after the site had ceased operating.

Wallace Recycling do not foresee the need for a long term site monitoring or aftercare management plan should current operations at the facility cease.

16. ENVIRONMENTAL LIABILITIES STATEMENT

Having reviewed our process activities it has been concluded that potential future liabilities are considered to be limited to emergency situations such as oil spills and fire. Wallace Recycling Ltd has adopted Emergency Procedures to manage and control such incidents and minimise the associated environmental impacts.

Wallace Recycling Ltd has a cash fund in place to cover any environmental damage caused by Wallace Recycling Ltd' activities.

17. ANY OTHER ITEMS SPECIFIED BY THE EPA

None specified.