

Eco-Safe Systems Limited

Licence Register No. W0054-02

Annual Environmental Report 2009

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1. Introduction

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

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

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

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

2. Waste Quantities

Quantity of Waste Treated = 601 tonnes

Quantity of Process Residues to Landfill = 617.82 tonnes

Quantity of Waste Transferred off site for Disposal/Recovery = 2117 tonnes

Please see Appendix 1

3. Monitoring of Emissions

• Emissions to Sewer

Effluent discharge results for 2009 have been reviewed respectively. All required reports have been made to the EPA.

D.2 Emissions to Sewer W0054-02 for 2009								
	Q1		Q2		Q3		Q4	
	Grab (mg/l)	Daily Load (kg/day)	Grab (mg/l)	Daily Load (kg/day)	Grab (mg/l)	Daily Load (kg/day)	Grab (mg/l)	Daily Load (kg/day)
B.O.D	958	1.68	1563	1.38	968	1.7	1,887	3.74
C.O.D	2354	4.14	2937	2.8	3044	5.36	4,388	8.6
Suspended Solids	3.8	0.006	9.2	0.008	39	0.07	2.6	0.005

Sulphates (as SO₄)	<1	N/A	1.5	N/A	4.57	0.010	1.3	0.0025
pH	9		7.0		9.2		7.1	
Total coliform/100ml	None Detected		74 per 100ml		None Detected		7 per 100ml	
Faecal coliform/100ml	None Detected		None Detected		None Detected		None Detected	
Faecal streptococci/100ml	None Detected		None Detected		None Detected		None Detected	
Culturable Enteroviruses	Not carried out		Not carried out		Not carried out		Not carried out	

- Emissions to Air**

Bacterial and VOC samples were taken in 2009 were compliant.

D.4 Emissions to Atmosphere				
	4.08.09		27.11.09	
	mg/m³	kg/hr	mg/m³	kg/hr
Ammonia	1.1	0.02	1.3	0.259
Hydrogen Sulphide	0.18	0.004	0.17	0.034
Mercaptans	0.04	0.07	0.03	0.07
Total VOC's	1.1	0.02	1.727	0.034
Indicator Microorganisms				
<i>Staphylococcus aureus</i>	<1		<1	
<i>Pseudomonas</i>	<1		<1	
<i>Faecal streptococci</i>	<1		<1	
Total Particulates	10.9	0.4	4.231	0.841

D.5 Ambient Air Monitoring								
Location Point	4.08.09				27.11.09			
	AA1	AA2	AA3	AA4	AA1	AA2	AA3	AA4
Total Coliforms	<1	<1	<1	<1	<1	<1	<1	<1
E. Coli	<1	<1	<1	<1	<1	<1	<1	<1
Enterococci	<1	<1	<1	<1	<1	<1	<1	<1
Staphylococcus	<1	<1	<1	<1	<1	<1	<1	<1
Pseudomonas	<1	<1	<1	<1	<1	<1	<1	<1
Sulphite Reducing	<1	<1	<1	<1	<1	<1	<1	<1
Total Aerobic @ 22° C	3	4	3	3	12	17	10	8
Total Aerobic @ 37° C	<1	1	3	2	17	22	14	13

Overall Emissions Compliance

Overall compliance was achieved during 2009.

4. Resources

Annual utilities usage and are shown below;

5. Water Usage 2009.

2009 water readings were not true readings due to leakage on main water line. All leakage has been repaired and a water meter has been installed to record weekly readings of water consumption on site

6. Gas Usage

Gas Usage		
Year	Quantity (KWh)	Percentage
2009	1187686	-8.29
2008	1286101	-7.11
2007	1377549	-16.31
2006	1602207	

7. Electricity Usage.

Electricity Usage		
Year	Quantity (KWh)	Percentage
2009	240941	-1.46
2008	244528	-22.04
2007	313680	6.87
2006	293490	↑

8. Development

Development Works Completed 2009

- Repairs to yard surfacing.
- Painting of Floor area of Green side
- Detection and repair of Water leakage on mains line.

Development Works Scheduled for 2010

- Introduction of Bio-Systems; re-usable sharps container processing plant (as agreed with the Agency 2010).
- Relocation of Veterinary Environmental Management to Unit 1 Allied Industrial Estate.

9. Incidents and Complaints, External and Supplier Audits.

As per Waste Licence W0054-02;

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 exceedance of the daily duty capacity of the waste handling equipment;
- d) any trigger level specified in this licence which is attained or exceeded;
- e) any test failures of waste samples taken (microbiological and temperature strips);
- f) any malfunction of any abatement equipment.

Summary of Incidents for 2009:

Type	Summary	EPA Notified
Complaint	Vehicles Parked in Estate Route way	No
Complaint	Incorrect use of C1	No
Complaint	Odour from bin sent to customer	No
Complaint	Eco-Safe bin in city street	No
Complaint	Eco-Safe bin in city street	No
Complaint	Primary Packaging supplied to customer	No
Complaint	Primary Packaging supplied to customer	No
Environmental	Condition 5.11.1-exceedence of waste retention time	Yes
H&S	Injury to Driver	No
Transport	ADR Regs	No
Transport	ADR Regs	No
Transport	Road Traffic Incident	No
Transport	ADR Regs	No
Transport	Traffic Incident with Neighbors FLT	No
Transport	ADR Regs	No

External audits

Summary of External Audits for 2009:

Auditing Body	Year	Non Conformances	General Observations/ Recommendations
EPA	2008	4	1
	2009	0	7

SGS	2008	N/A	N/A
	2009	2	17

Copies of the Audit Reports and the Eco-Safe Systems responses (if required) are in Appendix 2.

Supplier Audits

Supplier audits completed for 2009:

Date	Facility	Waste Licence/ Permit No	Auditor
27/08/09	Veolia Fermoy Cork	W0054-02	C Harkin
19/05/09	Irish Lamp	WFP-KE-08-0348-01	C Harkin
22/06/09	Indaver Ireland	W0036-02	C Harkin
15/07/09.	Greenstar Fassaroe, Bray, Co. Wicklow	W0053-03	C Harkin
24/07/09	Enva, Shannon	W0041-01	C Harkin

Copies of the Audit Reports are held on site as per EMS Procedure.

10. Environmental Objectives and Targets.

Objective/target	Actions required to achieve objective/target	Responsible person(s)	Target date	Date completed	Progress
Reduce non compliant waste/reduced plant downtime	Customer communications programme/Reduction in downtime per anum at all sites.	General Manager/Commercial Manager	Jan 2011	Total Downtime = % Compiled Annually in line with AER.	Ongoing.
Quantify emissions to sewer/minimise emissions	Record effluent data/compare per anum at all sites.	General Manager/Plant Managers	Jan 2011	Compiled Annually in line with AER.	Ongoing.
Minimise consumption/reduce from 07 Vs 08	Programme for review treatment process for potential inefficiencies and opportunities for reductions in energy use; at all sites.	General Manager/Environmental Manager	July 2011	Compiled Annually in line with AER.	Ongoing.
Minimise or avoid wastes to landfill. Reduce the use of disposable waste packaging.	Investigate technologies and potential outlets. Investigate re-usable packaging options.	General Manager/Environmental Manager	July 2010	/	Ongoing.
Develop corporate policies and procedures to suit Irish operations.	Review, transfer and update Corporate BMS Health & Safety Policies and Procedures with a view to producing versions for ROI.	H&S Manager/Environmental Manager	July 2010	/	Ongoing.
Managers to review and ensure all staff training.	JM to ensure training and competence is in line with the Training Matrix.	H&S Manager/General Manager	July 2010	/	Ongoing.

11. Environmental Management Programme.

The Eco-Safe Systems site was added to the scope of the SRCL Ireland Limited EMS during 2009.

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

Ob 1 – FD has stated that the supply of absorbent mats for export waste containers has significantly reduced repackaging issues. Quantifiable data is to be supplied to CH.

Downtime for waste derived issues is significantly lower than 2008; data to be supplied to CH at Q4 end.

Ob 2 – Information continues to be collated at Beech Road; high usage has been noted during July by quarterly EPA report. The water usage issue at Eco-Safe is to be investigated; metering etc shall be installed pending the results of this investigation.

Ob 3 –

Eco-Safe: Utility readings at Eco-Safe are not being compiled as required; this is to commence ASAP.

Beech road: The refurbishment of Line 1 is planned for 2010; a replacement of the hoist and auger is to take place. There are some legal issue to be resolved with the manufacturer prior to the auger replacement.

Ob 4 – Lagan Cement project is nearing completion. EPA are to agree revised spore testing procedures. CH to obtain formal agreement on use of Lagan Cement as a waste recovery outlet for process wastes.

Ob 5 – Joe Mahon has revised UK H&S procedures from the Steripoint System to suit ROI operations and legislative requirements. These have been provided to plant managers in a folder. JM has stated that the use of the Steripoint system may be of benefit in this case. CH and JM are to review.

Ob 6 – All H&S training is up to date. CH to audit training at the Beech Road site by Q4 end. Information is to be presented to JJ; the training needs of each department will be the responsibility of the line manager. Each line manager will be responsible for the upkeep of training records. All training records to be held in FD's office.

<p><i>CH - Colm Harkin – Environmental Manager (Chair / Minutes)</i> <i>JJ - John Johnston – General Manager</i> <i>FD - Fiona Dowling – Commercial Manager; Beech Road</i> <i>JM - Joe Mahon – Plant Manager; Kylemore / H&S Manager Ireland</i> <i>JMcH - James Mc Hugh – Transfer Station Manager</i> <i>KMcC - Kevin McCarthy – Commercial Manager; Kylemore</i></p>
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12. New Procedures

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

Please see appendix 3

13. Noise

The annual noise monitoring for 2009 was completed at the specified boundary points on 3rd March.

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

The subcontractors report is available as Appendix 4.

14. Bund, Tank and Pipe Inspections

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

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

15. Financial Provision.

The Company is covered by Marsh Insurances for liabilities totalling €13m each for Employers Liability and Public Liability. Copies of Insurances are to be found in Appendix 5.

16. Management Structure.

The present Management Structure at the site is detailed in Appendix 6.

Details of the responsibilities are as follows:

General Manager

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

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

Plant Manager

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

Commercial Manager

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

Financial Manager

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

Transport Manager

- The Transport Manager is responsible for the day to day transport operations of SRCL (& ECO-SAFE SYSTEMS).

Offsite Management (Not based at site/ Corporate Resources)

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

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

Environmental Manager

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

Health & Safety Manager

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

Human Resources Manager

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

All Personnel

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

17. Public Information

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

18. Boiler Efficiency Testing

Boiler testing completed during 2009 as in accordance with Insurance requirements. Under normal steam conditions operation was seen to be as per design.

19. Use of Quarantine Store

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

20. Residuals Management Plan

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

21. Measures to Prevent Environmental Damage

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