

SRCL Limited

Licence Register No. W0055-02

Annual Environmental Report 2009

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1. Introduction

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

SRCL Ireland Limited is involved in the collection and treatment of clinical waste under Waste Licence no. W0055-02 issued on 24 January 2006 by the Environmental Protection Agency.

The waste management facilities at 420 and 430 Beech Road, Western Industrial Estate, Naas Road, Dublin 12 are authorised to carry out the following activities (Schedule A.1):

- Shredding of waste
- Sterilisation of waste
- Repackaging processes*
- Storage of waste
- Recovery of paper, plastics, textiles and metals from treated waste*

*PVC separation plant in place as agreed with the EPA; full operation is to commence during second quarter of 2010.

Under Schedule A.2, handling of the following EWC codes and waste quantities is authorised:

Waste Type	EWC codes	Maximum Annual tonnage
Hazardous Waste for Treatment	180101-04 180201-03	15,000
Hazardous Waste for Transfer only	180102-03 180106-09 180202 180205-08	2,000
Non-hazardous waste	150102	1,000

2. Waste Quantities

Amounts of waste received, processed and subsequently sent to landfill during the year 2009 were:

Quantity of Waste Treated = 8874 tonnes

Quantity of Process Residues to Landfill = 9560.16 tonnes

Quantity of Process Residues to Lagan Cement as Low Carbon Fuel = 62 tonnes

3. Monitoring of Emissions

As follows.

4. Emissions to Sewer

Effluent discharge results for January-December 2009 have been reviewed respectively. All required reports have been made to the EPA; with Non-compliant readings being notified to the EPA and the County Council as required. Overall compliance was good; only a few issues with ELV's have been noted. No emissions values have exceeded the x1.2 limit as set in condition 4.1 of the Waste Licence.

5. Emissions to Air

Bacterial and VOC samples were taken in 2009 were in compliance with the Waste Licence Emission Limits Values.

6. Overall Emissions Compliance

Overall emissions compliance during 2009 was good. Only two flow and one pH readings exceeded the ELV. The data is derived from the quarterly reports to the EPA.

7. Resources

Annual utilities usage and are shown below:

8. Water Usage

Water Usage			
Year	Quantity (m ³)	Percentage	Overall percentage
2009	4982	↓18.7%	↑25.2%
2008	6132	↑8.9%	
2007	5633	↑13.7%	
2006	4863	↑22.2%	
2005	3980	100%	

9. Gas Usage

Gas Usage			
Year	Quantity (MWh)	Percentage	Overall percentage
2009	2250	↓7.6%	↑65%
2008	2436	↑20.1%	
2007	2028	↓6.9%	
2006	2177	↑60%	
2005	1363	100%	

10. Electricity Usage

Electricity Usage			
Year	Quantity (MWh)	Percentage	Overall percentage
2009	429	↑4.2%	↓28.6%
2008	412	↓19.4%	
2007	511	↑35.1%	
2006	379	↓36.9%	
2005	601	100%	

11. Development

12. Development Works Completed 2009

- Repairs to foul sewer drainage system; as highlighted during drainage survey.
- Refurbishment of Process Line 1 Shredder and Auger jacket/lids.
- Installation of “Red Wave” PVC Separation Facility and a new Conveyor System for loading Walking Floor Trailers; to allow processed waste to be used as RDF by Lagan Cement.
- Re-surfacing of yard area.

13. Development Works Scheduled for 2010

- Upgrading of Air Extraction System on Process Line 2.
- Set up of Waste Transfer Station in Unit 420 (as per W0055-02).

14. Incidents and Complaints, External and Supplier Audits

Incidents

Incidents are defined in Waste Licence W0055-2 (Glossary) as:

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

On these criteria, zero incidents were notified to the Regulator during 2009.

External Audits

The only external audit completed was by the EPA during April 2009. The audit report generated 1 non-conformance and a number of minor observations; all of which were addressed in the company’s response in May 2009 and subsequently accepted.

Two External audits completed by SGS, one during January 2009 and another one during July. The audit report generated zero non conformances in January. The audit report generated 2 minor non conformities in July.

Copies of the Audit Reports and the SRCL responses (if required) are in Appendix 1.

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	Invader 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.

15. Environmental Objectives and Targets 2009

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 annum 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 annum 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.

16. Environmental Management Programme

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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17. New Procedures

A revised Environmental Management System (branded; SRCL Ireland Limited) was issued during 2009. This has been certified to the ISO14001 standard by SGS Ireland.

18. Noise

The annual noise monitoring was completed at boundary points B1 (front of Unit 430), B2 (rear of Unit 430), B3 (front of Unit 420) and B4 (rear of Unit 420) on 10th March 2010.

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 specified in condition 7.3 of the Waste Licence. The breaches noted are due to traffic and not to waste treatment operations.

The subcontractors report is available as Appendix 3.

19. Bund, Tank and Pipe Inspections

There are no separate above ground tanks or other areas requiring bunding. A self-bunded tank has been installed on site for the storage of Bio-fuel. All chemicals such as bin-cleaning detergents, diesel and lubricating oil are kept on bund-trays and a bund cabinet. While these items are recorded on a test schedule; none of these items have required testing as yet as they are all under 3 years old.

An independent inspection of underground drains was completed during 2008 and subsequent drainage repairs were conducted. A final Integrity Test report was completed during 2009; therefore this will not be required again until 2014.

20. Financial Provision, Management Structure and Public Information

21. Financial Provision

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

22. Management Structure

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

Details of the responsibilities are as follows:

General Manager

The overall responsibility of the General Manager is to oversee the effective and efficient running of the SRCL 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 SRCL customers in terms of services.
- The Commercial Manager reports directly to the general manager.

Financial Manager

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

Transport Manager

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

Operations Manager SQ (Transport)

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

Offsite Management (Not based at site/ Corporate Resources)

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

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

Environmental Manager

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

Health & Safety Manager

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

Human Resources Manager

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

All Personnel

- All Company employees are required to have an awareness of the possible environmental consequences of their actions, and are encouraged to report

any adverse conditions and suggest improvements; and to operate the EMS and associated Procedures as appropriate.

23. Public Information

Public information is displayed on the Site Notice Board according to condition 3.2.1 and 3.2.2 of the Waste Licence. Certain documents are available on request at the site during normal office hours.

24. Boiler Efficiency Testing

Boiler testing was completed during 2009. Under normal steam conditions operation was seen to be as per design.

25. Use of Quarantine Store

Unintentional submissions of waste are recorded. An 'Inappropriate Waste report' is completed in each case and the customer contacted. There were a total of 113 cases reported at the site for 2009. These were quarantined and either returned to source or sent to the contracted waste transfer station for ultimate disposal via Incineration (on receipt of a covering C1 from the source institution).

26. Process Efficacy

The routine monitoring of the process shows that biological inactivation by the steam.

Disinfection process currently used by SRCL is very effective. All results for 2009 have been reported to the EPA on a Quarterly basis; as required by the Waste Licence. There were no test failures during 2009.

A review of the need to carry out these numerous and complex tests was requested in 2003, supported by a report by Dr. Malcolm Holliday, a leading UK microbiologist.

In his view, parametric monitoring coupled with microbiological testing was sufficient verification of the effectiveness of the process; as the technology is already proven.

Parametric monitoring and Recording systems have been installed and are fully functional on both Treatment Lines.

As per the provisions of Waste Licence Condition 8.14.8 / SCHEDULE C4 - NOTE 2; the following test method has been proposed:

Challenge testing using *Bacillus Atrophaeus* (formally *Bacillus subtilis* var. *niger*) as the indicator organism, testing to 6 Log¹⁰ reduction; conducted 3 times per week (in house) with monthly off-site verification by an external laboratory.

An agreement on reduced challenge testing frequency (outside laboratory validation) was achieved during 2008. Challenge testing is now conducted daily, in-house and weekly, by an external laboratory.

27. Process Verification Report

The routine monitoring of the process shows that biological inactivation by the steam disinfection process currently used by SRCL is very effective.

There is also a schedule of far more extensive annual tests; it has so far been impossible to source laboratories which can handle all or even most of them.

The Licence Review Application has again requested a decision about this from the EPA; however, no decision has been handed down to this date.

28. Residuals Management Plan

This has been provided in Appendix 6 (Site Closure Plan). This does not require any additional information from the 2008/9 document.

29. Measures to Prevent Environmental Damage

SRCL operates 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.

30. Environmental Liability Risk Assessment

This does not require any additional information. See 28.