

SOLTEC IRELAND LTD

WASTE LICENCE No: W0115-01

ANNUAL ENVIRONMENTAL REPORT

of

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Dec 2009

1 Introduction

11.1 Annual Environmental Report

11.4.1 The Licence shall submit to the agency for its agreement within thirteen months from date of grant of the licence, and within one month of the end of each year. Thereafter an Annual Environmental Report (A.E.R)

11.4.2 The (A.E.R) shall include as a minimum the information specified in schedule G content of the Annual Environmental Report and shall be prepared in accordance with any relevant written guidance issued by the agency. Schedule G content of the annual environmental report.

Annual Environmental Report Findings.

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1 Reporting period

1.1 Soltec was issued with waste Licence W0115- 01 on 21st June 2002.

1.2 This A.E.R is the sixth to be submitted by Soltec Ireland Ltd and covers the twelve-month period from 1st Jan 2008 to 31st December 2009.

2 Waste activities carried out at the facility.

2.1 The licensed activities carried out at Soltec's facility as per Waste Licence no. W0115- 01 are as follows:

Fourth, Schedule of the waste management act 1996.

Class 1: Solvent reclamation or regeneration.

This activity is limited to the distillation of waste solvent.

Conditions:

5.3.1 Storage of waste

5.3.3 No waste shall be stored at the facility for longer than six months.

5.8 Off - site disposal and recovery.

5.8.1 Waste sent off- site for recovery or a waste contractor agreed by the E. P.A. shall only convey disposal.

3 Quantity and composition of waste received disposed of and recovered.

3.1 The types, quantities and destinations of waste handled by Soltec's waste transfer facility over the 12-month period 1/01/08 - 31/12/09 have been calculated using invoices and site waste records.

3.2 Table 1 summarizes the types, quantities and destinations of waste brought to Soltec's facility over the 12-month period 01/01/09 -31/12/09.

Table 1. Waste Received/ Recycled /Disposed from Soltec's Ireland Ltd Facility.

Month	Solvent Composition	Solvent Received (Kgs)	Solvent Recycled (Kgs)	Solvent Disposed (Kgs)
Jan 09	Mixed Waste Solvent	23400	20700	2700
	Solvent Liquid Sludge	2600	0	2600
	Solvent Ink Waste	400	0	400
	Solvent Based Developer	260	0	260
	Solvent Liquid Waste	20260	15579	4681
	Waste Acetone	3200	2600	600
	Waste Methanol	6000	6000	0
Sub- Total		56120	44879	11241
Feb 09	Aqua Ink Waste	3000	0	3000
	Solvent Liquid Sludge	4000	0	4000
	Waste Toluene & Isopropanol	5000	5000	0
	Mixed Waste Solvent	21800	18600	3200
	Solvent Liquid Waste	19380	16490	2890
	Sub Total		53180	40090
Mar 09	Mixed Solvent Waste	23000	23000	0
	Solvent Liquid Sludge	9000	1000	8000
	Solvent Liquid Waste	60760	55712	5048
	Solvent Waste	1800	0	1800
	Sub -Total		94560	79712
April 09	Liquid Waste Solvent	78565	68480	10085
	Waste Methanol/Ethanol	400	200	200
	Waste Acetone	3200	0	3200
	Cortron Rn256	200	0	200
	Sub Total		82365	68680

Month	Solvent Composition	Solvent Received (kgs)	Solvent Recycled (kgs)	Solvent Disposed (kgs)
May 09	Liquid Developer Fixer	1300		
	Liquid Solvent Waste	22470	17220	5250
	Solvent & Aqua ink Waste	2000	0	2000
	Solvent Ink Waste & Aqua Ink Waste	1000	0	1000
	Liquid Solvent Sludge	11400	2800	8600
				1300 on site
Sub - Total		38170	20020	16850
June 09	Waste Isopropanol	18000	18000	0
	Waste Acetone	2400	2400	0
	Solvent Liquid Sludge	11000	3600	6000
	Solvent Liquid Waste	38200	34804	2996
	Sub - Total		69600	58804
				1800 on site
July 09	Aqua Waste Developer	3000	0	0
	Cleaning Solvents	1280	0	800
	Mixed Waste Solvents	22200	22200	0
	Solvent Ink Waste	3800	0	3800
	Solvent Liquid Waste	8200	2600	4800
	Solvent Liquid Waste	18680	16147	2533
	Waste Acetone	2400	2400	0
	Sub - Total		59560	43347
				4280 on site
Aug 09	Solvent Liquid Sludge	4875	275	3700
	Anti Freeze	150	150	0
	Caustic soda	13	13	0
	Solvent Liquid Waste	56270	45715	9455
	Waste Acetone	1600	1600	0
	Sub - Total		62908	47753
				2000 on site
Sept 09	Aqua Wash	155	155	0
	Cortron	200	0	0
	M T B E	3000	3000	0
	Solvent Liquid Sludge	6600	800	5600
	Solvent Liquid Waste	4940	340	1000
	Waste Methanol	8679	8679	0
	Waste Mixed Solvents	9350	9350	0
	Sub - Total		32924	22324
				4000 on site

Month	Solvent Composition	Solvent Received (kgs)	Solvent Recycled (kgs)	Solvent Disposed (kgs)
Oct 09	Mixed Waste	13330	13330	0
	Sludge Ink	4800	0	4800
	Solvent Liquid Waste Sludge	10000	2400	4000
	Waste Acetone	2800	2400	0
	Waste Developer	1875	0	0
	Waste Ink	10160	0	10160
	Waste Methanol	17358	17358	0
	Waste Oil	200	0	0
	Waste Silicone/Toluene	3600	0	1200
	Waste Water	775	0	0
Sub Total		64898	35488	20160
				9250 on site
Nov 09	Waste Acetone	1400	0	0
	Aqua Wash	80	0	0
	Solvent Liquid Sludge	6600	0	2000
	Solvent Liquid Waste	20	0	0
	Waste IPA	2200	0	0
	Water Based Waste	40	0	0
Sub Total		10340	0	2000
				8340 on site
Dec 09	Aqua Wash	50	0	0
	Developer	1000	0	0
	EpoxyLite	24	0	0
	Waste Methanol	600	0	0
	Mixed Waste Solvent	22600	0	0
	Photo Developer	1000	0	0
	Solvent Based Sludge	4800	0	0
	Solvent Liquid Sludge	6090	0	0
	Solvent Liquid Waste	2505	0	0
	Waste Acetone	4820	0	0
	Waste Glycerine	800	0	0
	Waste Ink	45	0	0
	Water Based Ink	3000	0	0
	Water Based Varnish	4000	0	0
Sub -Total		51,334		51334 on site
Total in Kgs		675,959	461,097	132,558
Total in Tonnes		675.959 T	461.097 T	132.558 T & 82.304T Still on Site

Solid Waste Received /Disposed/Recycled from Soltec's Facility

Month	Composition	Received Kgs	Recycled Kgs	Disposed of Kgs
Jan 09	Solid Waste	8600	0	8600
Sub Total		8600	0	8600
Feb 09	Solid Waste	11000	0	11000
Sub Total		11000	0	11000
Mar 09	Solid Waste	14600	0	14600
Sub Total		14600	0	14600
April 09	Solid Waste	11000	0	11000
Sub Total		11000	0	11000
May 09	Solid Waste	22220	0	22220
Sub Total		22220	0	22220
June 09	Solid Waste	13720	0	13720
Sub Total		13720	0	13720
July 09	Solid Waste	9200	0	9200
Sub Total		9200	0	9200
Aug 09	Solid Waste	11000	0	9600
Sub Total		11000	0	9600
				1400 still on site
Sept 09	Solid Waste	12500	0	10100
Sub Total		12500	0	10100
				2400 still on site

Oct 09	Solid Waste	16000	0	11000
Sub Total		16000	0	11000
				5000 still on site
Nov 09	Solid Waste	9661	0	4200
Sub Total		9661	0	4200
				5461 still on site
Dec 09	Solid Waste	14139	0	0
Sub Total		14139	0	0
				14139 still on site
Total		153640	0	125240
Total in Tonnes		153.640 T	0	125.240 T
				28.000 T Still on Site

3.3 Schedule A, of Waste Licence W0115-01 allows Soltec to accept up to 5,000-tonnes/year of organic solvents at the facility. The above table shows that the Soltec facility received 675,959 Kgs of waste solvent over the period January 2009 to December 2009.

Assuming that 1,000 kgs of solvent is equivalent to 1 tonne, the Soltec facility is operating within the conditions of the waste Licence, having received 675.959 tonnes of organic solvents over the 12-month period. The total of solid waste received in was 153,640 Kgs or 153.640 tonnes.

3.4 During the 12-month reporting period, Soltec records show that 461.097 Tonnes of solvent were recovered and 132.558 Tonnes of solvent were disposed of, and 82.304 Tonnes of solvent are still waiting to be processed. The total of solid waste disposed of off site is 125.240 Tonnes which was recovered off site as a fuel in cement kilns and 28.000 Tonnes of solid waste still on site.

4. Quantity and Nature of recovered solvent dispatched from the facility.

4.1 Table 2 summarises the quantities and nature of recovered solvent that was dispatched from the facility over the last 12 months. The figures are based on site records held by Soltec management.

Table 2.

Quantity and Nature of recovered solvent dispatched from the facility.

Period	Recovered Solvent Liquid (Tonnes)	Use
Jan 09 To Dec 09	461	Used as thinners by commercial & private consumers

Period	Solid Waste Recovered as Fuel for Cement Kilns (Tonnes)
Jan 09 To Dec 09	125

5. Quantity and Nature dispatched for recovery or disposal.

5.1 Table 3 summarises the quantities and nature of wastes that was dispatched from the facility over the last 12 months. The figures are based on site records held by Soltec management.

Table 3 Quantity and Nature of Waste dispatched for recovery or disposal.

2009	Solvent Liquid Tonnes	Solid Waste Tonnes	Cardboard Waste Tonnes	Timber Waste Tonnes	Plastic Waste Tonnes	General Waste Tonnes	Fluorescent Bulbs	Waste Battery	Bund Water Tonnes
Jan	18.400	0	0.08833	0.1616	0.5083	2.2883	0	0	0
Feb	21.797	3.200	0.08833	0.1616	0.5083	2.2883	0	0	4.200
Mar	17.557	13.340	0.08833	0.1616	0.5083	2.2883	0.008	0.310	0
Apr	35.880	0	0.08833	0.1616	0.5083	2.2883	0	0	2.200
May	13.080	15.820	0.08833	0.1616	0.5083	2.2883	0	0	4.800
June	17.540	15.530	0.08833	0.1616	0.5083	2.2883	0	0	2.800
July	17.700	8.400	0.08833	0.1616	0.5083	2.2883	0	0	0
Aug	19.928	7.560	0.08833	0.1616	0.5083	2.2883	0	0	0
Sept	18.067	12.920	0.08833	0.1616	0.5083	2.2883	0	0	0
Oct	30.260	2.880	0.08833	0.1616	0.5083	2.2883	0	0	4.200
Nov	0	8.500	0.08833	0.1616	0.5083	2.2883	0	0	0
Dec	18.763	1.420	0.08833	0.1616	0.5083	2.2883	0	0	13.000
Total	228.972	89.570	1.05999	1.9392	6.0999	27.460	0.008	0.310	31.200

5.2 The quantity of waste solvent (i.e. liquid) sent for disposal between January 2009 to December 2009 was 228.972 Tonnes.

The quantity of solid waste sent for disposal between January 2009 and December 2009 was 89.570 Tonnes.

6. Reports on Emissions

6.1 Soltec employed Euro Environmental Services to carry the following analysis.

- Emissions to the Atmosphere - See attached Report No. 1570/M24 dated 25th February 2009
- Emissions to the Atmosphere - See attached Report No. WO115-01CAR09-01 dated 9th November 2009
- Environmental Noise Survey- See attached Report No. 1570/M25 dated 26th February 2009
- Groundwater Monitoring – See attached Report No 1570/M23 dated 26th February 2009.
- Reconnaissance Report No WO115-01CAR09_RECCI dated 13th March 2009
- Bund Verification Report – See attached Report No. 1570/M19 (**Next report due in 2011**)

8. Resource and Energy Consumption Summary

8.1 The main energy use at the Soltec facility includes:

- Electricity
- Heating and Oil

8.2 A review of utility bills over the last 12 months shows that Soltec used the following quantities.

Table 8. Energy Consumption

Energy	Quantity	Cost
Electricity	123,461	19,606.85
Heating Oil	21,795	9,316.23

- Excludes Demand Charge, Service Capacity, and Vat.

8.3 The main resources used at the Soltec facility include:

- Water
- Metal drums
- Plastic drums
- Cardboard boxes
- Pallets
- Pallet Boxes
- FIBC

8.4 A review of the last 12 months shows that Soltec used the following quantities:

Table 9. Material Consumption

Material		Cost
Water /Rates		8,518.27
Plastic Drums	9,720 X 5 Litre	4,686.12
	9,816 X 20 Litre	29,147.38
	96 X 25 Litre	503.64
Cardboard Boxes	4,356	3,856.24
I B C 'S	78	3,120.00
Metal Drums	698	7,927.50
Pallet Wrap	18	589.80
Pallets	775	2,712.50
FIBC+ Liners	1,500	4,087.50

- Excludes meter rental, standing charge & VAT.

9. Proposed Development of the facility and a time scale for such development.

9.1 The following Table outlines the proposed plant and site development and approximate time scale. There are No further proposed developments at this stage.

9.2 Proposed Site Development.

Proposed development	Time scale
Soltec have applied for a Review of the Licence W0115-01	Dec 2010

10. Report on development works undertaken during the reporting period.

10.1 Site developments implemented by Soltec during the reporting period are tabulated below.

Table 11. Site Developments

Item	Detail
N/A	Due to the current economic climate there were no site developments in 2009

11. Estimated annual and cumulative quantity of indirect emissions to groundwater.

11.1 The main solvent handling, storage and processing areas at the Soltec facility are covered in concrete or tarmac. Rainwater runs off drains from the building roof and external concrete areas directly to sewer. Groundwater sampling and analysis has shown that there are no significant detectable traces of solvent in the groundwater. Ground water from central bund is tested and sent off site for treatment.

11.2 There are no obvious significant indirect emissions from the Soltec facility to groundwater. Soltec sends the bund water for disposal off site.

12. Report on the progress towards the achievement of the environmental Objectives & Targets contained in the previous year's report.

Objective	Target	Action	Date	Progress
To investigate the feasibility of covering the bunded areas	Dec 2009			
To connect the vent pipe from the storage tanks to an extractor system	Dec 2009			Completed

13. Schedule of Environmental Objectives & Targets for the forthcoming year.

13.1 The environmental objectives for 2009 - 2010 are shown below.

Table 12. Environmental Objectives

Objectives	Date
Soltec have applied for a review of the Waste Licence No W0115-01	June 2010

14 Summary of written procedures developed during the previous 12 months.

14.1 Soltec has developed a series of written procedures, which relate to the operation of the facility. The following table details the procedure titles and a summary of their content:

Table 13. List of written procedures

Title	Summary of the Procedure
SOP 2.1	Quality System
SOP 9A.3	Production of Solvents
SOP 9A.4	Toxic & Dangerous Waste Regulations
SOP 9A.5	Determination of Distillation Range
SOP 9A.6	Determination of Boiling Point
SOP 9A.7	Determination of weight per Milliliters & Density
SOP 9A.8	Determination of Moisture Content
SOP 9A.9	Solvent Recovery Unit
SOP 9A.10	Satorius Scales
SOP 9A.12	Discharge of Bulk Solvent
SOP 9A.13	Proscon Soltec Batch Recovery
SOP 9A.14	To Transfer Product
SOP 9A.15	Waste Discharge
SOP 9A.16	Soltec Emergency Plan
SOP 9A.17	Clean Mode
SOP 9A.19	Epa Licence Application
SOP 9A.20	Quality Inspection
SOP 9A.21	Calibration pH Meter

SOP 9A.22	Waste Water Discharge
SOP 9A.23	Handling Storage & Disposal EWC Codes 150202 UN No 1325 Un No 3175
SOP 9A.24	Production of Solvent for Bulk Tankers
SOP 9A.25	Karl Fisher Titration
SOP 9A.26	Paint Test
SOP 9A.27	Rinsing the Lines
SOP 9A.28	Operating Instructions Jean Briel Machine
SOP 9A.29	Lone Working Policy
SOP 9A.30	Servicing Machines
SOP 9A.31	Quality Inspection

14.2 The above procedures are available for inspection at the Soltec facility if required.

15 Tank, pipeline and bund testing and inspection report.

15.1 A bund integrity assessment was carried out at the site and a copy of the report is attached.

16 Reported Incidents and complaints summary.

16.1 There were no reported incidents or complaints in relation to Soltec's facility during the reported period covered in this AER.

Report on financial provision made under this licence, management, and staffing structure of the facility.

- 17 Soltec has recently invested heavily to upgrade the existing site and install additional solvent recycling plant. There are no immediate plans to stop trading.

However should Soltec cease its current operations all machinery plant and stock would either be relocated to an alternative site or sold. All solvent/chemical storage tanks would be emptied site wastes would be appropriately disposed of and the site secured against vandalism.

Soltec will render safe or remove from the site all reasonable materials waste plant or equipment contained on or in the site that may result in environmental pollution.

Soltec will consider any reasonable request by the EPA to deposit a security bond in the case of insolvency. This bond will be used to cover the cost of any site decommissioning if required.

The environmental risks associated with Soltec activities include soil groundwater and surface water contamination. These risks only occur during site operations Soltec do not store waste for long periods or dispose of any waste materials on site. If operations were to cease the potential environmental risks would be significantly reduced, there would not be any expected long-term environment effects after the site has closed.

As a result of the above Soltec, do not foresee the need for a long term site monitoring or an aftercare management plan once the operation has ceased.

17.1

An Environmental Liabilities Risk Assessment was carried out and submitted to the agency.

17.2

Michael Corcoran, Managing Director, has overall responsibility for ensuring that the conditions of the Waste Licence are adhered to.

Michael manages the facility, is responsible for contracts, purchasing, and staff management, and is responsible for the environmental management and operational staff training on site.

17.3

Paddy O Keeffe is responsible for transport of the Hazardous Chemicals and up keep of the yard.

17.4

Mary Lynam-Dunne, Accounts Manager, is responsible for credit control; document and data control; and is in charge of quality records and internal audits.

17.5

David Corcoran, Laboratory Assistant, is responsible for carrying out tests on samples, and keeping records of same.

17.6

Juris Krivko is responsible for the manufacture of products to specific requirements. The collection and delivery of products. The handling, storage & packing of products. Stock and Process Control and testing. He is also involved in laboratory tests, analysis, and keeping required records of them.

17.7 Pete Jordan is a Sales Representative who is responsible for increasing our customer contacts and sales in Carlow, Clare, Cork, Limerick, Kerry, Waterford and Wexford.

17.8 Thomas Corcoran is a Sales Representative who is responsible for increasing our customer contacts and sales in Cavan, Meath, Offaly, Kilkenny, Tipperary and Westmeath.

17.9 Vincent Ronan is a Sales Representative who is responsible for increasing our customer contacts and sales. Dublin, Louth, Kildare and Monaghan.

17.10 Niamh Dunne's main responsibilities are entering sales and purchase invoices, filing, typing, reception duties and any other office duties that arise

17.11 Igor Majoros is a general operator whose main responsibilities are filling thinners and upkeep of yard.

17.12

In compliance with condition 3.3 of Soltec's waste licence, a facility notice board has been placed outside the main entrance of the facility as described. Soltec has established a public file for inspection by interested parties.

18 Report on staff training

18.1 Soltec has implemented an environmental training schedule for relevant staff, including attendance and completion of the F.A.S. Waste Management Course. Attendances at further relevant training courses are detailed below.

Table 14. Staff Training.

Name	Training
David Corcoran Igor Majoros	Forktruck Training
Peter Jordan Vincent Ronan Thomas Corcoran David Corcoran Juris Krivko Igor Majoros Niamh Dunne Mary Lynam -Dunne	Fire Safety Training

19. Boiler Efficiency Test Results

19.1 The Soltec facility has one small oil fired boiler. It is proposed that an efficiency test be carried out on this boiler during the next round of emissions monitoring which is scheduled to take place.