

Waste Licensing

**Waste Transfer and Recycling Facility
Dock Road
Limerick**

**Annual Environmental Report
2009**

Veolia Environmental Services (Ireland) Ltd.

EPA Ref. No:	W0082-02
---------------------	-----------------

Environmental Protection Agency
Regional Inspectorate Office
Iniscarra, Co. Cork.
Telephone: 021- 4875540 Fax: 021- 4875545

VEOLIA ENVIRONMENTAL SERVICES (IRELAND) LTD.

WASTE TRANSFER AND RECYCLING FACILITY

ANNUAL ENVIRONMENTAL REPORT

2009

Prepared by:

Garrett Walsh
Environmental Officer
Veolia Environmental Services (Ireland) Ltd.

TABLE OF CONTENTS

	PAGE
1 INTRODUCTION.....	1
1.1. Veolia Environmental Services (Ireland) Ltd. Environmental Policy	2
2 DESCRIPTION OF THE SITE.....	3
3 MONITORING AND EMISSIONS SUMMARY	4
3.1. Emissions to Surface Water	4
3.2. Foul Sewer Monitoring Results	7
3.3. Dust Deposition	7
3.4. Noise	8
3.5. Groundwater Monitoring	9
3.6. Interpretation of Monitoring Results	10
3.6.1. Surface Water Discharge	10
3.6.2. Foul Sewer Discharge	10
3.6.3. Dust Deposition	10
3.6.4. Noise	10
3.6.5. Groundwater Monitoring.....	11
4 SITE DEVELOPMENT WORKS.....	12
5. WASTE RECEIVED BY AND CONSIGNED FROM THE FACILITY.....	13
5.1 Waste Handled by VES Ireland Ltd. in the Limerick Region.	13
5.1.1 Waste Composition	13
5.1.2 Quantities of Waste Disposed or Recycled.....	13
5.1.3 Unacceptable Waste.....	13
6.0 ENVIRONMENTAL INCIDENTS, COMPLAINTS & NUISANCE CONTROL	15
6.1 Incidents Summary	154
6.2 Complaints Summary.....	15
7.0 OBJECTIVES & TARGETS and ENVIRONMENTAL MANAGEMENT PLAN	17
7.1 Introduction	17
7.1.1 Schedule of Environmental Objectives and Targets	17
7.1.2 Achievement of Environment Objectives and Targets.....	17
7.2 Report on 2008 O&T and 2009 Plan.....	16
7.3 Environmental Management System	19
7.4 Management and Staffing Structure	23
7.5 Financial Provisions.....	24
8.0 RESOURCE CONSUMPTION SUMMARY.....	25
9.0 WASTE LICENCE AUDIT AND REVIEW.....	26
10.0 REPORT ON PUBLIC INFORMATION PROGRAMME.....	27

Appendix I – Site Plan showing monitoring points

1 INTRODUCTION

Veolia Environmental Services Ireland Ltd. holds a Waste Licence (Reg. No. W0082-2) issued by the Agency in November 2003 for its waste transfer and recycling station at Ballykeefe, Dock Road, Limerick. In January 2001, Veolia Environmental Services (Ireland) Ltd. formerly known as IPODEC assumed operation of the site. A licence transfer application was submitted to the Agency in February 2001. This was approved by the EPA in April 2002. A waste review application was submitted to the Agency in October 2002 and this was granted by the Agency on the 06/11/2003. In accordance with the requirements of Schedule E of the Waste Licence, an Annual Environmental Report (AER) for the facility must be submitted to the Environmental Protection Agency (EPA).

This is the ninth AER, covering the reporting period from 1st January to 31st December 2009.

The facility is located at: -

Ballykeefe,
Dock Road
Limerick.

Tel. (061) 304545

Fax: (061) 225964

National Grid co-ordinates for the location of the facility are: E 15545 N 15560.

1.1. Veolia Environmental Services (Ireland) Ltd. Environmental Policy

Veolia Environmental Services (Ireland) Ltd. is fully committed to the operation of its facilities to the highest environmental standards and fully supports and adheres to that policy.

It is the policy of Veolia Environmental Services (Ireland) Ltd. to protect the local environment and to minimise the impact of the operation on the environment. To achieve this objective it is committed to:

- Adhering to all relevant environmental legislation and relevant statutory obligations that relate to its activities both on and off site.
- Ensuring that all operations carried out by the company are done in a manner which ensures that environmental protection is taken into account.
- Providing and maintaining site facilities that are designed, constructed, operated and maintained to encompass the principles of good environmental practice.
- Striving to achieve a continuous improvement in efficiency of operations and environmental performance.
- Striving to minimise the quantity of waste disposed of at landfill and increasing the amount of material recycled / recovered.
- Providing environmental information to the community and responding positively to queries or complaints.
- Providing adequate training to all employees on environmental awareness and resource management.

Original signed by Morgan Toner 21/08/06

2 DESCRIPTION OF THE SITE

The site is situated at Ballykeefe, Dock Road, Limerick, in an area dominated by industrial and commercial buildings. The site is located adjacent to the N69, on the main Limerick to Foynes road and is readily accessible via the local road network.

Waste handling activities at the facility consist of accepting and bulk loading of commercial, industrial and municipal waste for transfer to a number of landfills. Waste Materials are also recovered or recycled at the facility - cardboard, paper, timber, metal, plastic, glass and C&D waste are recovered from the waste streams for recycling. Disposal and recycling activities are approximately equal by tonne output.

The licensed waste handling activities, permitted under the Third and Fourth Schedule of the Waste Management Act (1996), in the Waste Licence (82-2) are as detailed below;

Third Schedule, Class 12. Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.

Third Schedule, 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.

Fourth Schedule, Class 2. Recycling or reclamation of organic substances (including composting and other biological transformation processes) which are not used as solvents.

Fourth Schedule, Class 3. Recycling or reclamation of metals and metal compounds.

Fourth Schedule, Class 4. Recycling or reclamation of other inorganic materials.

Fourth Schedule, 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.

3 MONITORING AND EMISSIONS SUMMARY

Environmental monitoring results for the reporting period are outlined in the following sections. An interpretation of the results and impacts on the environment are also presented. A site plan showing the position of each monitoring location is included in the Appendix.

3.1. Emissions to Surface Water

Site emissions to surface water are addressed in Schedule D.4 of the Waste Licence 82-2. The Licence requires that emissions to surface water be measured bi-annually. Samples are taken from 2 locations, WS9 and WS10, which are surface water samples from the stream that runs alongside the facility. The number of locations has been reviewed and by instruction of the Agency, only locations WS9 & 10 are retained. (No ELVs or trigger levels are set for these two points). Discharge from the interceptors, which enters the stream, is done at FE1A & FE1B. An additional surface water monitoring point has been added, the sump beside the metal bay. The samples are analysed for levels of pH, Total Suspended Solids (TSS), biochemical oxygen demand (BOD), mineral oils and oils, fats, greases (OFG). The metal bay sump has extra parameters as below. All sampling is carried out by trained personnel and analysis is carried out by BHP Laboratory.

A summary of the results is given in Table 3.1 a and b below.

Table 3.1a Surface Water Monitoring 2009

Parameter	Monitoring location			
	WS9	WS10	WS9	WS10
	11/03/09	11/03/09	09/12/09	09/12/09
pH	6.83	6.87	6.9	6.88
BOD mg/l	7.0	7.0	4.0	4.0
Suspended Solids (mg/l)	15.2	42.4	26	12
Mineral Oil mg/l	<0.01	<0.01	<0.01	<0.01

OFG mg/l	3.8	4.6	<1	<1
-----------------	-----	-----	----	----

Table 3.1b Surface Water Discharge Results 2009

Parameter	ELV's	FE1A	FE1B	Metal Bay	FE1A	FE1B	Metal Bay
		11/03/09	11/03/09	06/10/09	09/12/09	09/12/09	09/12/09
pH	N/A	6.89	6.84	5.98	6.91	6.94	5.39
BOD mg/l	N/A	8.0	30	626	37	11	95
Suspended Solids (mg/l)	60	11.2	18.4	198	20	128	60
OFG mg/l	N/A	2.4	3.0	35	<1	<1	1.6
Mineral Oil mg/l	5	<0.01	<0.01	<0.1	<0.01	<0.01	<0.01
Ammonia mg/l	N/A	-	-	18.7	-	-	0.01
Total Heavy Metals mg/l (11 elements tested)	N/A	-	-	0.151	-	-	0.097

Emission limit values were issued for mineral oils and suspended solids for surface water discharges, of 5mg/l and 60mg/l respectively. The Metal Bay sump is prior to all sumps & interceptors, whereas FE1A & B are final effluents to which the ELVs apply.

3.2. Foul Sewer Monitoring Results

Schedule D.5 of Waste Licence requires that emissions to foul sewer be monitored bi-annually, but from October 2009 onwards, the Agency required monthly sampling at the truckwash sump (pre-treatment) and FE2 (post treatment). In addition, the FE2 monitoring point's ELVs were to be based on the EPA Waste Water Treatment Manual Guidelines as below. Currently all foul water arising from the site offices and truckwash is treated by the on-site wastewater treatment plant. The results of the monitoring are detailed in Table 3.2 below.

Table 3.2(a) Foul Sewer Monitoring Results – Pre-treatment

LOCATION Truckwash	BOD Mg/l	pH	TSS Mg/l	OFG Mg/l	Total N Mg/l	Total P Mg/l	Ammonia Mg/l - N	Sulphate Mg/l	COD Mg/l	NO3 Mg/l	NO2 Mg/l
11/03/09	68	6.58	20	45	51	5.75	8	50.5	230	<0.1	<0.05
28/10/09	2330	7.26	117	30	7	0.54	0.33	41	3400	1.5	<0.05
23/11/09	361	6.16	95	23	21.5	0.15	0.8	56.2	680	48.1	<0.05
16/12/09	672	4.0	416	12	60	1	0.22	222.7	19500	222.2	1.09

Table 3.2(b) Foul Sewer Monitoring Results – Post-treatment

LOCATION FE2	BOD Mg/l	pH	TSS Mg/l	OFG Mg/l	Total N Mg/l	Total P Mg/l	Ammonia Mg/l	Sulphate Mg/l	COD Mg/l	NO3 Mg/l	NO2 Mg/l
ELV	25	N/A	35	N/A	N/A	N/A	N/A	N/A	125	N/A	N/A
11/03/09	11	6.67	4	2	16	0.01	1.3	132	47	<0.1	<0.05
28/10/09	14	7.41	39	4	21	0.44	<0.01	81.7	30	14.5	<0.05
23/11/09	14	6.64	6	2	7	0.7	0.9	36.1	54	24.8	<0.05
16/12/09	4	6.6	9.2	2	45	2	<0.01	110.8	45	184.7	1.84

3.3. Dust Deposition

Dust monitoring was carried out during August-September, September-October and November-December in accordance with the Standard Bergehoff Method and in compliance with schedule D.2 of Waste Licence 82-2, to determine the impact of site operations on the surrounding environment. Results of this monitoring are presented in Table 3.3. below.

Table 3.3 Dust Monitoring Results 2009

<i>Month</i>	<i>DM1</i>	<i>DM2</i>	<i>DM3</i>	<i>ELV's</i> <i>mg/m³/day</i>
August-September	339.4	97.2	147.8	350
September-October	73.3	21.1	88.3	350
November-December	61.1	87.7	95	350

3.4. Noise

Condition 9.3 of the waste licence requires that noise monitoring be carried out at the facility annually. Monitoring was carried out at the facility, nighttime and daytime, at each of the monitoring locations, NI1 to NI4 during November 2009, the results of which are detailed in Table 3.4 below.

Table 3.4 Noise Monitoring Results

Reference No.	Description	Measurement Start Times and Period	dB(A)		
			L _{Aeq} ELV 55 Dav. 45 Night	L _{A10}	L _{A90}
DAYTIME					
NI1	North-Western Site Boundary At water treatment plant	12.01 15 mins	49	52	50
NI2	Northern Site Boundary Glass Bay	12.58 15 mins	50	59	47
NI3	South western site boundary Corner of MRF,near phone mast	12.33 15 mins	54	57	53
NI4	South-Eastern Site Boundary Entrance Gate	14.05 15 mins	65	68	59
NIGHT-TIME					
NI1	North-Western Site Boundary	07.31 15 mins	46	49	45
NI2	Northern Site Boundary	06.56 15 mins	45	50	41
NI3	South western site boundary	06.28 15 mins	50	53	48
NI4	South-Eastern Site Boundary	06.01 15 mins	62	65	49

3.5 Groundwater Monitoring

Veolia Environmental Services is also required under the conditions of waste licence 82-2 to monitor groundwater boreholes at the site, on a bi-annual basis. There are currently 3 groundwater monitoring points at the facility – GWM1, GWM2 and GWM3. Groundwater monitoring was carried out during September and December 2009. The results are detailed in Table 3.5.1 and 3.5.2 below.

Table 3.5.1 September 2009 Groundwater Monitoring Results

Parameter	GWM1	GWM2	GWM3
BOD mg/l	3	3	3
Suspended Solids mg/l	154	62.8	474
Dissolved Oxygen mg/l	18.3	22	48.3
OFG mg/l	15.5	13	16.5
Ammonia mg/l N	2.2	4	0.15
Conductivity (µS/cm)	892	1626	895
Total Phosphorous mg/l	0.1	0.01	<0.01
Diesel Range Organics mg/l	<0.01	<0.01	<0.01
Aliphatic HC mg/l	<0.01	<0.01	<0.01
Undecane mg/l	<0.01	<0.01	<0.01

Table 3.5.2 December 2009 Groundwater Monitoring Results

Parameter	GWM1	GWM2	GWM3
BOD mg/l	6	5	2
Suspended Solids mg/l	645	300	1070
Dissolved Oxygen mg/l	4.7	60.2	80.1
OFG mg/l	7.3	18.6	4.6
Ammonia mg/l N	9.6	4	1.9
Conductivity (µS/cm)	757	1207	818
Total Phosphorous mg/l	1.7	0.15	0.34
Diesel Range Organics mg/l	<0.01	<0.01	<0.01
Aliphatic HC mg/l	<0.01	<0.01	<0.01
Undecane mg/l	<0.01	<0.01	<0.01

No ELVs are set for groundwater analysis in W0082-02.

3.6 Interpretation of Monitoring Results

3.6.1. Surface Water Discharge

Results were compliant at all points, with the exception of FE1B on 09/12/09, logged as an incident and put down to heavy rainfall. Point de-silting of previous sumps was undertaken in January 2010 to recover the situation. Receiving waters were satisfactory throughout the year.

3.6.2. Foul Sewer Discharge

Full cleanout of the WWTP and truck wash system took place in February 2009. De-sludging of the truck wash took place regularly throughout the year. There was one incident recorded 28/10/09, with suspended solids being marginally over ELV, resulting in another truck wash de-sludging action and a return to satisfactory results.

3.6.3. Dust Deposition

There were no non-compliances recorded for dust deposition during monitoring events in 2009. Results showed the effect of more regular use of the road sweeper, the pruning back of branches overhanging DM1 and a very wet summer.

3.6.4. Noise

The results of the noise survey carried out show that the site is located in a high noise environment. Traffic noise during both day and night-time monitoring was a significant source of noise at all of the monitoring locations with the exception of one, NI2.

The environmental noise assessment carried out at the site examined the background noise in the region and the noise generated by the waste management operations on the site. The following conclusions have been reached:

- The site is located in a high noise area, where traffic noise from the Dock Rd dominates.
- Three of the four monitoring locations, NI1, NI3 and NI4, are particularly influenced by this traffic noise.

In general, the noise emissions from the site are consistent with the general noise regime in the area. During the daytime monitoring period, there were a diffuse range of noise sources from the commercial/industrial area around the site particularly from the high volumes of traffic in the area. There was another co-dominant sound emanating from the direction of the Limerick Sewage Works/Tunnel works. The main local noise source on-site was from fork-lift and truck movements in the yard. NI1-2&3 points were compliant with the daytime limit of 55dB(A) and slightly improved on last year. The dominant noise source in the locality during both day and night monitoring periods, however, was from traffic (including construction traffic) on the adjacent Dock road (point NI4).

3.6.5 Groundwater Monitoring

The contract laboratory, which sampled and analysed the groundwater points, found that all three boreholes had hydrocarbons below the limit of detection of 0.01mg/l.

4 SITE DEVELOPMENT WORKS

Further works undertaken to increase waste processing capacity and the provision of standby capacity at the site during the reporting period are summarised hereunder;

- A grab machine is available at all times on-site in case of a breakdown in the loading shovel.
- Veolia Environmental Services reduced its forklift numbers at the site from four to two in 2009 for the task of loading of recyclables and feeding the baling machine. It is highly unlikely that both forklifts would break down at the same time and there is more than adequate standby capacity to continue with recycling operations as normal.

Development Works 2009

Due to market conditions, no development works were undertaken in 2009.

Development Works Planned for 2010

Veolia Environmental Services plan to connect to the Limerick City Council Main Drainage Sewer during 2010. The current Klargester sewage treatment system is to be decommissioned and site sewage and truckwash effluent is to be piped into the Main Drainage Sewer. This development will also serve adjacent commercial premises.

We are awaiting formal issue of a final approval to connect to the plant from the Property Section of Limerick County Council (landowners whose fields the pipeline will cross) and Agency co-approval of the terms of Limerick City Council's Waste Water Treatment Plant effluent acceptance criteria of December 2009 prior to commencing construction works.

5. WASTE RECEIVED BY AND CONSIGNED FROM THE FACILITY

5.1 Waste Handled by VES Ireland Ltd. in the Limerick Region.

5.1.1 Waste Composition

Waste accepted at the Waste Transfer and Recycling Facility is commercial and industrial, and construction and demolition. All waste is non-hazardous. The waste received at the facility during the reporting period amounted to 42,536 tonnes, or 47,000 tonnes below the limit of 90,000 tonnes per annum set in Waste Licence 82-2. The relative quantities and types of waste accepted into the facility during the reporting period are summarised in Table 5.1.

Table 5.1 Waste Sources to Veolia Environmental Services 2009 v 2008

MATERIAL	MSW	CB & Paper	PLASTIC	WOOD	METAL	C&D	WEEE	GLASS	SLUDGE	MIXED PACKAGING	Food & Green Waste
QTY 2009 (Tonnes)	19411	3403	2450	1370	856	1331	1	436	4729	8379	170
QTY 2008 (Tonnes)	26686	14260	984	1900	247	1100	1	472	4671	7882	0

5.1.2 Quantities of Waste Disposed or Recycled

Waste collected and brought to the Waste Transfer and Recycling facility has a number of disposal routes listed in the Waste Treatment Survey, already submitted. All facilities are licensed or permitted. Recyclables, such as cardboard, plastic, timber, metal and C&D are removed from the waste stream and sent to licensed or permitted facilities for recycling. The relative quantities of waste removed from the facility for disposal / recycling during the reporting period are summarised in Table 5.2 & 5.3. More detail may be found in the Waste Treatment Survey, already submitted to the Agency.

Table 5.2 Waste Quantities Removed from Veolia Environmental Services 2009 v 2008

Destination of Waste	Tonnes 2009	%	Tonnes 2008	%
MWM Landfill Disposal	18,453	44	26,672	45.7
MWM (Shred) Energy Recovery - Trial	10	0	0	0
Sludge Landfill Disposal	4813	12	4,203	7
Sludge Recycling (Landfill Cover)	27	1	156	0.3
Other Recycling	18,307	44	27,623	47

Table 5.3 Breakdown of Other Recycling/Recovery at Dock Rd. facility 2009 v 2008

Waste type	Cardboard & Paper	Plastic	Timber	Glass	C&D	Textiles	Metal	WEEE	Food & Green Waste	Mixed Dry Recyclables
EWC Codes	15 01 01/ 20 01 01	15 01 02/ 20 01 39	20 01 38/ 15 01 03	15 01 07	17 01 07 17 08 02	20 01 11	20 01 40	20 01 36	02 03 04/ 20 01 08/ 20 02 01	20 03 01
Quantity 2009 (Tonnes)	9326	1413	1763	432	1353	0	1293	4	153	2507
Quantity 2008 (Tonnes)	18891	1855	2653	478	1469	112	654	8	0	1502

5.1.3 Unacceptable Waste

Throughout the twelve-month period any waste that was deemed to be unacceptable and/ or hazardous according to the Waste Register was removed to the Waste Quarantine Area prior to removal off-site for proper disposal where possible.

An increasing number of empty domestic gas bottles were removed from waste loads throughout the reporting period. These bottles were safely stored on-site and sent for recovery to Calor Gas during 2009.

6.0 ENVIRONMENTAL INCIDENTS, COMPLAINTS & NUISANCE CONTROL

6.1 Incidents Summary

Condition 8.1 of Waste Licence W0082-02 requires that the licensee shall make written records of the environmental incidents. There were two incidents recorded for the reporting period, one relating to surface water emissions and the other foul water effluent, both for suspended solids as noted in Section 3.6 above.

6.2 Complaints Summary

As in 2008, there were no complaints received during 2009.

6.3 Nuisance Control at the Facility.

In compliance with condition 6.1 and 6.3 of the waste licence, weekly nuisance and litter inspections are carried out at the facility by the Environmental Officer. The site is inspected for evidence of vermin, odour, litter, mud, dust and insects. Each inspection is recorded, including any corrective action that may be taken as a result of the inspections.

Veolia Environmental Services has an on-going contract with Rentokil Initial Ltd. for the control of vermin at the facility. This includes the provision and maintenance of forty bait boxes for the control of rats and mice at the facility and treatments of insects at the facility, including the site offices, transfer and recycling building and any other area, which may be affected. Pest activity on site during 2009 was classified as light.

Litter picks are carried out on a daily basis, in compliance with condition 6.3. If dust is found to be a nuisance at the facility, the concrete surfaces of the yard are sprinkled periodically with water to suppress dust levels. Mud is removed from the facility by sweeping the yard with the contracted road-sweeper. A smaller unit was hired in 2009, allowing access to a greater area of the site.

7.0 OBJECTIVES & TARGETS and ENVIRONMENTAL MANAGEMENT PLAN

7.1 Introduction

As previously structured up to 2008, the “EMP” (actually an EMS update report, under Conditions 2.2 to 2.4) includes the schedule of objectives and targets, site operational procedures and the management and staffing structure reflecting current appointments at the facility. The EMP (EMS) also summarises the procedure by which members of the public can obtain information, at all reasonable times, concerning the environmental performance of the facility. As per the agreed 2008 O&T, the company has implemented an ISO 14001 Environmental Management System, which significantly alters the previous documentation system (see Section 7.3).

The Schedule of Environmental Objectives and Targets and the Environmental Management Plan – *outlining the methods by which the O&T has been or is to be achieved* - for the reporting year and the forthcoming year are summarised in Section 7.2 below.

7.1.1 Schedule of Environmental Objectives and Targets

A detailed Schedule of Environmental Objectives and Targets for the reporting period and the forthcoming year is presented in Section 7.2. The Schedule of Objectives and Targets is a multi-annual document (as per Condition 2.3.2.1), but it will be understood that as EMP methods or targets are achieved, they may be replaced with new methods or targets designed to achieve a *continuing* overall objective. The Site Environmental Review has identified new Objectives and Targets to add to the previous schedule.

7.1.2 Achievement of Environment Objectives and Targets

Veolia Environmental Services Ireland Ltd. Objectives and Targets were set by the company and submitted to the Agency in last year’s AER. Some of these targets were achieved during the year, but others had to be postponed or restructured due to the economic climate. A summary of the achievement of targets and objectives to-date proposed is also presented in Section 7.2.

Veolia Environmental Services Ireland Ltd has made significant efforts to achieve all of the targets set by the individual objectives. Items referred to within these objectives are site specific and are the combined responsibility of the Regional Manager, Area Manager and Environmental Officer.

7.2 Report on EMP (Achievement of Environmental Objectives & Targets) 2009 and EMP Plans for 2008

What follows is the planned medium term O&T for the Limerick site, replacing previously annual O&Ts. This was approved in early 2009. The final columns identify progress made to date (March 2010) in achieving the O&T and, in italics, the continuing plans for 2010. The last Site Environmental Review has identified a number of extra O&Ts to be addressed in this plan. These (No 5 onwards) were added to the original four objectives and targets going forward.

Objective	Target	2009 Target Completion Date	Responsibility	Environmental Management Plan/ Programme	Status and 2010 Target Completion Dates
1-Redefine licence boundary	The Cussens Crane Hire facility is outside the control of Veolia Environmental Services (Ireland) Ltd.	April 2009	EHSO Regional Manager <i>Responsible Manager</i>	“Submission of the internal results is expected to be made in April 2009.” This Soil Investigation Report was submitted to the Agency in October 2009. Groundwater tests on this site continue. “Management to decide on whether to proceed with licence boundary amendment.” Due to the pending sale of the company, Licence Review was postponed. <i>Discussions are to be held with the new owners regarding their plans for possible Licence Review on this issue.</i>	Complete October 2009 Postponed until sale process completed. <i>December 2010</i>
2-Continue to increase recycling rates at the facility.	Expand material types for recycling	June 2009	Area Manager <i>Area Manager</i>	“Organic waste collection (for transfer) to commence in 2009.” Food waste and green waste were segregated from June 2009 and sent for composting or anaerobic digestion. In addition, better manual segregation of general waste inputs throughout the year has aided achievement of this O&T. <i>Increase Organic waste recovery and find alternate uses for other wastes (e.g. water clarification sludge for landfill cover, rather than disposal).</i>	Completed June 2009 <i>Ongoing</i>

Objective	Target	2009 Target Completion Date	Responsibility	Environmental Management Plan/ Programme	Status and 2010 Target Completion Dates
3-Implement ISO14001, 9001 and 18001	Full implementation of working accredited EMS, QMS and SMS.	November 2009	Environmental Management Team	“Quality Management documents, including internal audits and training records are to be the main new efforts in 2009.” Training systems were advanced significantly in 2009, but all other Quality system developments were abandoned. The site continues to operate ISO-14001 and OHSAS-18001 systems put in place in 2008.	Training systems complete September 2009. Accreditation programme was suspended in 2009 pending sale of company
4-Training	Train Yard Foreman FAS Waste Operatives Course	2008	Regional Manager	“Not commenced. To be decided in 2009.” This was decided against as a result of market conditions and adequate site coverage. Regional Manager, Area Manager have completed FAS Waste Management Course. Facility Manager was the proposed trainee, but is undertaking H&S course at present. Current EHSO has also completed the course.	Postponed – <i>to review 2010</i>
5-Improve Emergency Response / Emissions to Surface Water	Review ERP and other structures and procedures to confirm that these address (i) odour issues and (ii) oil spillage issues (in emergency) effectively.	May 2009	NEM, NHSM, Environmental Management Team <i>Environmental Management Team</i>	“NEM, NHSM and local staff preparing study of same, which will lead to an updated ERP at the least.” Document VF117 was added to the ERP with a view to addressing off-site collector emergencies more effectively and odour & spill issues in general. Training has commenced for staff in June and continues. <i>Complete training/ retraining for all relevant staff to the ERP in 2010</i>	Completed May 2009 <i>December 2010</i>

Objective	Target	2009 Target Completion Date	Responsibility	Environmental Management Plan/ Programme	Status and 2010 Target Completion Dates
6-Legislative Compliance	Comply with terms of Licence W0082-02	Ongoing	All Regional Manager	<p><i>This will be a permanent Objective & Target going forward, performance to be measured in internal audits and Agency inspection reports.</i></p> <p><i>Complete foul water connection to Limerick City Main Drainage Plant. (Outline plans are ready. We await final approval from Property Section of Limerick County Council (landowner) and assent of Agency to Limerick City Council's acceptance criteria prior to contract tendering and award).</i></p>	<p><i>Ongoing</i></p> <p><i>2010</i></p>

7.3 Environmental Management System

Documented operating procedures for the facility, which are described in detail in the Environmental Management System held on site have undergone complete reorganisation as part of the existing objective and target (above) to implement an ISO-based system and are subdivided as follows: -

- Environmental Manual
- Site Environmental Review
- Objectives & Targets and Environmental Management Plan (See Sections 7.1 & 7.2 above)
- ISO Procedures and Flow Charts
- Standard Operating Procedures
- Emergency Response Procedures
- Communications Programme (See Section 10 below)

A brief summary of these is provided below.

7.3.1 Environmental Manual

This document outlines the Environmental Management System in place at Veolia, which is designed to achieve the requirements of both our Licence and the ISO 14001 standard. It refers to the following documents and record forms. The company also has an OHSAS 18001 Health & Safety Management – based system. Where possible, the company uses common procedures and forms for all management systems. There has been significant progress in reviewing and issuing the EMS documentation. The Manual includes an Environmental Policy, Management Tree and Schedule of Roles & Responsibilities. Issued in October 2008, 2009 personnel changes required its amendment..

7.3.2 Site Environmental Review

The SER, or Register of Aspects & Impacts, is a tool used to identify and quantify the environmental risk pertaining to operations under normal or emergency conditions. This risk assessment process helps identify Objectives and Targets going forward, should the quantification of risk identify the environmental aspect (or hazard) as having a high impact. The SER was issued in January 2009.

7.3.3 ISO Procedures and Flow Charts

The procedures are based on national templates, which have been reviewed and amended for local applicability. Flow charts are used where diagrammatic procedures are felt to be more useful than text in describing the operations in question. These VPs and VFCs – to an ISO-favoured format - have replaced many of the older SOPs below. Where possible, common procedures are

used for all management systems. The list of environmentally-relevant VPs and VFCs follow, and were issued in the second half of 2008.

VP001 Document & Data Control Procedure
VP002 Control of Records
VP003 Management Review Procedure
VP005 Internal Audit Procedure
VP006 Control of Unacceptable Waste
VP007 Procedure for determination of significance of Environmental Aspect
VP008 Objective & Target Setting
VP010 Environmental Aspect Identification
VP011 Internal & External Communication Procedure
VP012 Documentation requirements for Waste Movements
VP014 Legislation Register
VP015 Corrective & Preventative Action Procedure
VP017 Environmental Incident Investigation & Reporting
VP018 Environmental Complaints
VFC002 Work Allocation – Customer Orders
VFC003 Docket Processing
VFC005 Yard Operation & Recycling
VFC006 Maintenance of Equipment
VFC008 Human Resources

7.3.4 Standard Operating Procedures

The remaining Standard Operating Procedures' purpose is to ensure that routine tasks are carried out in the same manner each time they are undertaken, even if different operators perform them. They are to a local format and are used where site operations are sufficiently different from other depots in the Veolia Group not to warrant the issue of a VP or VFC. As in the latter two formats, their implementation encourages quality as well as safe work practices. Regard is also had for the site specific Safety Statement (reviewed in mid-2009 and again in early 2010) when carrying out any operations at the facility.

The (remaining) routine operations described in local-issue SOPs are as follows:

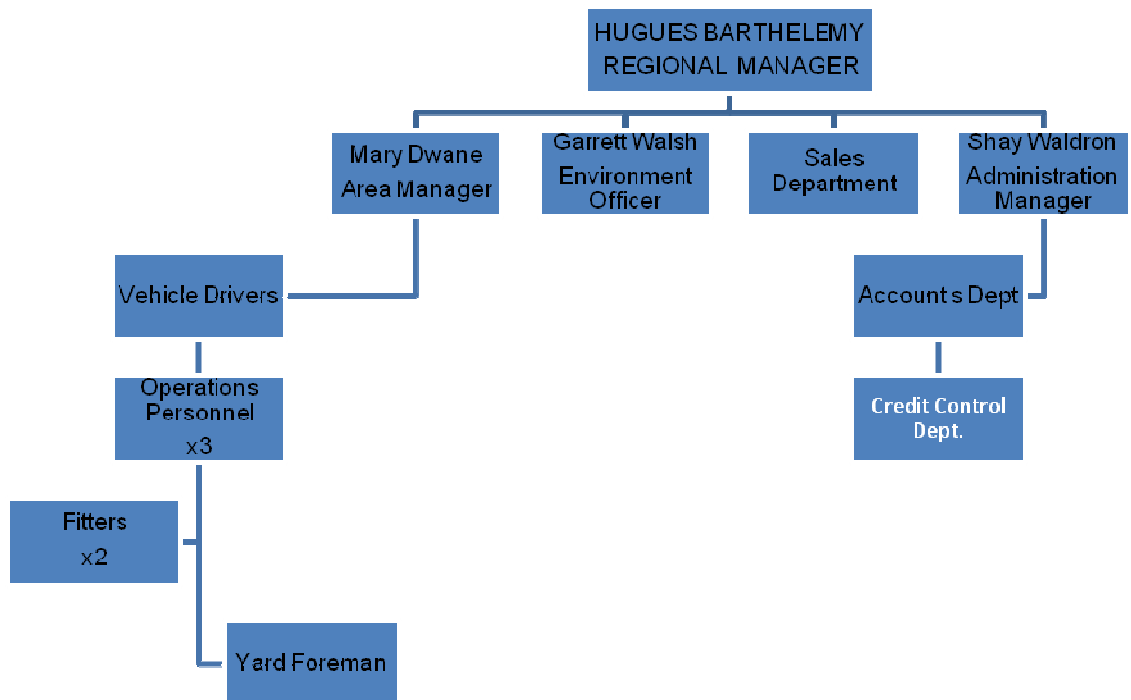
- Loading of Waste into transfer trailers
- Loading/Unloading of Trailers (recyclables)
- Baler/MRF operation.
- Shredder Operation
- Housekeeping
- Environmental Sampling & Monitoring
- Operation of equipment.

7.4 Management and Staffing Structure

The organisational structure for the facility is shown in Figure 7.1. Each of the positions identified in Figure 7.1 are discussed in detail in Section 10 of the Environmental Management Plan for the reporting year. Details of the relevant experience and qualifications for each person named, as well as arrangements for absence in the case of annual leave, illness and other absences, are maintained in the facility office.

A file consisting of training records for each employee is also maintained in the facility office.

Figure 7.1 Current Management and Staffing Structure



7.5 Financial Provisions

The Environmental Liabilities Risk Assessment (ELRA) was updated in August 2006 (performed by Fehily Timoney & Co to the methodology of the EPA Guidance Document on ELRA/CRAMP/RMP/FP) and forwarded to the Agency for approval. The ELRA proposed a financial provision of €160,000 in the form of an existing general insurance policy that would guarantee that potential liabilities arising from:

- Emergency situations occurring during operation of the site
- Closure and decommissioning of the site

are financially provided for.

In September 2008 Veolia confirmed the above information with the Agency and updated the Agency on the current financial provision through insurance policy, which continues to provide coverage well in excess of the above recommended figure.

.

8.0 RESOURCE CONSUMPTION SUMMARY

Resources consumed at the facility include electricity, diesel fuel, steel wire, water and hydraulic oil. The major consumers of energy at the facility are as follows:

- Baling and ancillary equipment (Electricity, Hydraulic Oil, Diesel)
- Mobile Plant (Green Diesel, Hydraulic Oil)
- Road Fleet for waste transfer (White Diesel).

Energy and resource consumption at the facility can be summarised as follows:

Resource (units)	2009	2008	% Change
Diesel Fuel (litres)	262,632	293,314	-10.5
Green Diesel (litres)	43,700	84,380	-48
Hydraulic Oil (litres)	2,100	3,000	-30
Electricity (kWh)	64,000	128,700	-50
Baling Wire (tonnes)	50	84	-40 (est)
Water (m ³)	248	259*	-4

*Correcting last year's submission (10ths of m3 counted as units).

Analysis:

Resource usage was reduced last year due to a number of actions taken by the company and economic factors. Electricity usage halved due to shutdown of the picking line, staff cuts and reduction in inputs to be baled. Diesel fuel usage was limited due to a reallocation of routes between company depots and more efficient route planning. On site vehicle fuel was also nearly halved due to the elimination of two forklifts and the reduction in timber inputs required less use of the shredder. The MRF picking line was closed for the year.

9.0 WASTE LICENCE AUDIT AND REVIEW

In addition to two EPA-performed water monitoring tests (ground water and foul water), there was one site inspection carried out by the Agency during the reporting period, on 08/10/09. The inspection report had six observations which were responded to on 28/10/09 and 18/12/09.

10.0 REPORT ON PUBLIC INFORMATION PROGRAMME

In compliance with condition 2.4 of the waste licence, a communications programme to ensure that members of the public can obtain information on the environmental performance of the company at all times was submitted to the Agency. During the reporting period there were no requests from members of the public to inspect any of the records and files listed in the submission. During customer audits however, environmental records, such as incident files, complaints files etc may be inspected. Company brochures listing a range of services and company history are also available on request.

The list of documents available for inspection is as follows:

- Training Records
- Communication Records
- Environmental Monitoring Results
- Complaints Register
- Non-Compliance Records
- Corrective Action Records
- Unacceptable Waste Records
- Pest/Vermin Control Records
- Daily transactions for incoming and outgoing vehicles
- Current Waste Licence
- Waste Licences of Facilities
- Waste Collection Permits of Hauliers
- Veolia Environmental Services Safety Statement
- Communications Folder
- Storm Line Inspection Reports
- Emergency Response Procedures
- General Housekeeping Reports
- Facility Inspection Reports
- Environmental Procedures
- Tonnage Records
- Recycling Information
- Material Safety Data Sheets

Members of the public who wish to inspect these files may do so at any reasonable time during office hours by contacting the Environmental Officer or Area Manager.

**Garrett Walsh,
Environment Officer
Veolia Environmental Services (Ireland) Ltd
Dock Road, Limerick.**

**Mary Dwane,
Area Manager
Veolia Environmental Services (Ireland) Ltd
Dock Road, Limerick.**

APPENDIX I
SITE PLAN WITH MONITORING POINTS