Report: Annual Environmental Report 2007

Report No.: 233/090227

Licensed Facility: Parkwest Facility

Licensee: Immark Ireland Limited.

Number: W0233

Report No. 233/090227
Rev.:_____
Date: _____
Authorised:_____

Annual Environmental Report Contents

Introduction

This report details the licencee's compliance with the requirements of Waste Licence, register reference no. W0233-01 in relation to the requirement to produce an Annual Environmental Report (AER).

The format of the report is consistent with Schedule F of Licence.

The Guidance Notes issued by the Agency for the preparation of Annual Environmental Reports for IPC licensed facilities have been consulted.

1.1 Licensed Facility

The licensed facility register reference no. W0233-01.

1.2 Name and Location

The AER is that of:

Immark Ireland Ltd.
Unit 52, Parkwest Business Park,
Nangor Road,
Dublin 12

1.3 Company Environmental Policy

A copy of the Company environmental policy is shown on the next page.

The company is accredited to ISO 14001. The auditing body is Certification Europe.

2 Environmental Policy

Immark is a customer orientated, waste management company specialising in the storage, transport, processing and disposal/recovery of waste materials in accordance with national and international regulations. Immark also carry out the assessment, remediation and clean up of areas following hazardous material contamination

We recognise that good management includes all environmental matters and we shall endeavour to protect the environment. Prevention of pollution to air, water and land are part of all decisions, policies and practices within Immark. Immark shall endeavour to work towards the following objectives:

1. *Manage our operations with diligence and with the awareness that our goal is to protect the environment and prevent pollution, by employing the best control mechanisms, procedures and processes which are proven technologically sound and economically feasible.*

2. *Comply with relevant environmental legislation and corporate guidelines and provide self-monitoring to ensure compliance.*

3. *Publish the Environmental Policy internally, by communication to all employees and posting the document on notice boards, and externally to all interested parties on request.*

4. *Train our employees to achieve continual improvement in environmental performance; the starting point is to comply fully with the requirements of ISO 14001: 2004*

5. *Focus on the primary environmental concerns:- the management of waste and energy efficiency in offices and management of environmental issues on site projects and special projects.*

6. *Foster openness, dialogue, enhanced communication and discussion with employees, customers, suppliers, persons working on behalf of the company and all interested parties regarding our environmental performance and our environmental objectives and targets.*

7. *Measure environmental performance by conducting regular environmental audits and assessments of compliance with the Environmental Policy, relevant environmental legislation and the requirements of the company.*

8. *To promote the theory of Environmental awareness to all contractors and to provide them with sufficient information to effectively comply with Immark's Management System.*

9. *To work with local authorities and Co Councils in an aim to divert more waste away from Landfill.*

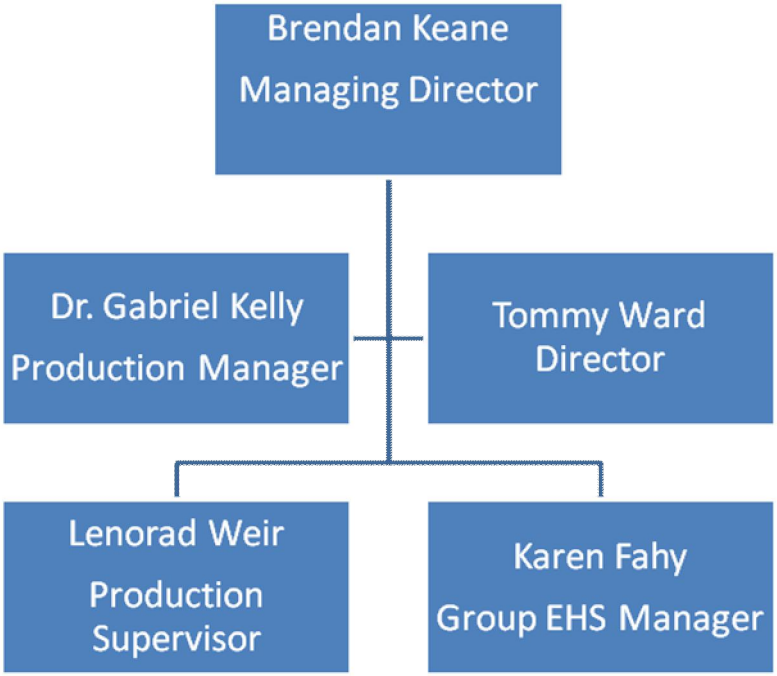
This policy statement shall be used as a framework for setting and achieving these objectives.

Signed: _____ Date:

Brendan Keane

Managing Director

2.1 Company Organisational Chart for Environmental Management



2.2 Reporting Period

2.2.1 Reporting Period

The reporting period is 1st January 2009 to 31st December 2009.

3 Waste Activities Carried out at the Facility

3.1 Introduction

The following is the list of waste activities permitted under W0233-01.

Activities in accordance with the Fourth Schedule of the Waste Management Act, 1996
Class 3. Recycling or reclamation of metals and metal compounds:
This activity relates to the storagesorting and processingof metallic wastes and waste electricaland electronic equipment (WEEE) for recovery

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:
This activity relates to the storage of waste at the facility prior to off-site recovery.

4 Wastes Managed

On the 3rd of July 2009 a request from Immark to add additional EWC Codes to the waste licence was granted by the Agency. These EWC codes included;

02 01 10	12 01 01	12 01 03	15 01 04
16 06 05	16 06 01	17 04 01	17 04 02
17 04 03	17 04 04	17 04 05	17 04 06
17 04 07	19 01 02	19 10 01	19 10 02
19 12 02	19 12 03	20 01 04	

On the 5th November 2009 a further request by Immark to add EWC Code 16 01 06 was granted by the Agency.

See:

Appendix 3 AER Returns Wooksheet

5 *Report on Emissions/Results and interpretations of Environmental Monitoring*

Monitoring for the period took place as per the chart below:

Stack monitoring was not carried for the period as the plant was shut down in February 2009. The Full WEEE process was restarted in March for a period of four weeks to process backlog material.

Surface water monitoring was carried out in April 2009. There was no emission of environmental significance. The Average mineral oil levels for SW1 and SW5 significantly decreased in the October round to 6.36 ug/l and 3.17 ug/l respectively when compared with April results below.

Ref.:	Sampling Date:	Parameter	Comments
1115/006/01	15/04/2009	Mineral oil	214.38 ug/L
	SW1	Total Suspended Solids	18 mg/L
		COD	16 mg/L
		Metals/NonMetals	No significant levels detected
		Organic Substances	<1 ug/L
		Boran	<4.2 ug/L
		Chromium	5.5
		Potassium	0.45
		Zinc	225
		Sodium	
1115/006/02	15/04/2009	Mineral oil	<31.27 ug/L
	SW5	Total Suspended Solids	<3 mg/L
		COD	9 mg/L
		Metals/NonMetals	No significant levels detected
		Organic Substances	<1 ug/L
		Mercury	<0.2 ug/L

A nosie survey was carried out by DixonBrosnan Environmental Consultants to determine is the the opeation of a scrap shears would impact on the environment. No facility emissions were audible at nosie sensitive locations and no tones or impluses were detected at offsite locations as sepcified in the report

See Appendix 2 for full monitoring reports.

6 Objectives & Targets of EMS

1. Schedule of Environmental Targets and Objectives 2007-2012

1. Ensure that the plant has a facility manager in place by 1st Quarter 2008
2. To conduct 3rd Party Audits of Waste Contractors and disposal sites
3. Reduce the volume of waste from the plant by 10%
4. Improve the Energy Efficiency of the plant
5. Improve the throughput and efficiency of the plant
6. Improve dust control measures in the plant
7. Carry out full Environmental Noise survey in Q3 2009

2. Environmental Management Programme proposal for 2009

The EMP implemented on site was audited by external auditors twice during 2009: April and September.

The system has been audited internally by external consultant and internally by the General Manager.

We have prepared a schedule of Environmental Objectives and Targets for the period 2007 – 2012.

These objectives and targets, listed above, were identified in June 2007 and were reviewed again in June 2009.

7 Procedures

Two procedures were issued during 2009.

PW-101 Waste Acceptance

PW-202 Security and Visitors

See Appendix 1 for full summaries of the procedures

8 Testing and Inspection Reports

No bunded structures are present on site. No testing has been carried out during the peroid.

9 Reported Incidents and Complaints Summaries

There was one incident in August of 2009 when two ELV hulks were accepted in error at the facility. They were removed and sent for processing to A1 Metals Mountmellick (Permit Number WMP007d). The Agency granted permission to accept non harardous ELVs in November 2009

During the reporting period no complaints were received.

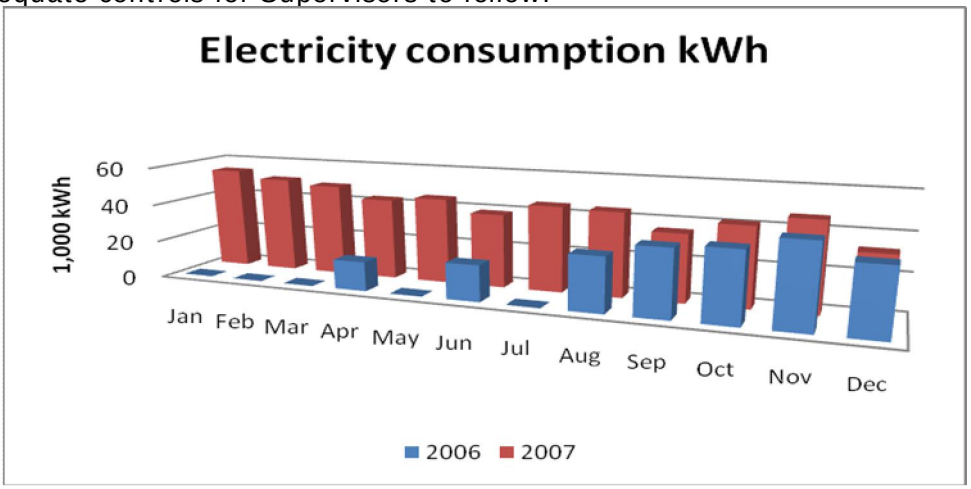
10 Review of Nuisance Controls

The Plant manager checks at least once a week inspecting the facility and its immediate surrounds for nuisances caused by litter and dust. The Plant Manager maintains a record of all nuisance inspections.

11 Resource and Energy Consumption Summary

Although an efficiency audit report has not yet been carried out, an internal technology and operations audit, was carried out by our sister company Immark AG. Even though there were no recommendations made regarding the energy efficiency of the plant it was mentioned during the audit that we could fit an inverter at the QZ motor to decrease energy consumption and by increasing the density of material exiting the QZ would increase the throughput of the process. It was also mentioned that we should look at reducing the MIC in 2008 closer to 500KVA.

The assessment of the efficiency of the use of raw materials in processes and the reduction in waste generated is on-going. Several process logs have been developed to record process data so that at a later stage we can introduce adequate controls for Supervisors to follow.



It should be noted that the WEEE Processing plant (and therfore the largest consumer of electricity) plant was operatinal for 3 months of 2009. Therfore energy consumption at the site has fallen.

12 Development and Infrastructural Works

No Specified Engineering Works have been carried out during 2007

13 Reports on financial provision made under this licence, management and staffing structure of the facility, and a programme for public information

A documented Accident Prevention Procedure is in place which addresses the hazards on-site, particularly in relation to the prevention of accidents with a possible impact on the environment. This procedure is reviewed annually and updated as necessary.

A documented Emergency Response Procedure is in place, which addresses any emergency situation which may originate on-site. This procedure includes provision for minimising the effects of any emergency on the environment and is reviewed annually and updated as necessary.

13.1 Programme for Public Information and Communications

The Notice Board is erected at the front of the premises detailing the Waste Licence Number and Holder, contact details and hours of operation. All requests for information from members of the public are to be put in writing to the Facility Manager, detailing what information is required. From this an appointment is made. No such requests have been made in 2009.

13.2 Staffing Structure

A1 Metals: Mr Tommy Ward (director)

Facility Manager: Dr Gabriel Kelly

Warehouse Supervisor / Environmental Officer Ilja Belkovskij

Weighbridge Superviso: Lenoard Weir

Warehouse Deputy: Brian Err

14 Foul Water

There has been no foul water produced for discharge or disposal for the reporting period.

15 Any other items specified by the Agency

Not applicable.

Appendix 1: Environmental Monitoring Reports

DixonBrosnan

environmental consultants

dixonbrosnan.com

Project			
Noise survey at Immark waste management facility, Park West, Dublin			
Client			
Immark			
Project no	No pages	Client reference	©DixonBrosnan 2009
09125	11	W0233-01	v250809

DixonBrosnan Shronagreehy Kealkill Bantry Co Cork
Tel 086 813 1195 | damian@dixonbrosnan.com | www.dixonbrosnan.com

Report no	Date	Status	Prepared by	Chkd
09125.1.1	23.09.09	Release to client	Damian Brosnan	CD
09125.1.2	29.09.09	Inclusion of conclusions	Damian Brosnan	CD

Contents

1 Introduction

1.1 DixonBrosnan Environmental Consultants were commissioned by Immark (formerly TechRec) to carry out a noise survey at their waste management facility at Park West Industrial Estate, Nangor Road, Dublin 12. The facility is operated in accordance with Environmental Protection Agency (EPA) waste licence W0233-02. Several conditions relating to noise are summarised in **Appendix 2**.

1.2 Following the recent installation of a new metal shears machine onsite, the licensee was advised by the Agency to commission a noise survey. It was requested that the survey be undertaken with the new machine both on and off. In addition, the Agency advised that the survey be carried out by Friday 04.09.09. DixonBrosnan was commissioned to undertake this survey. The survey was delayed due to inclement weather throughout August 2009. On arrival at the site on 04.09.09, the survey operator was informed that the shears machine had broken down. The survey operator therefore proceeded with the 'off' survey. The 'on' survey was undertaken on Thursday 17.09.09 following the repair of the machine. The surveys undertaken also constitute the 2009 annual compliance noise survey required by waste licence W0233-01.

1.3 Waste management operations were in progress internally within the building onsite during both surveys. No external activities were undertaken apart from vehicle arrival and departure, including truck movements on the weighbridge. Internal activities included manipulation of waste items by forklift truck and telescopic loader. During the 'on' survey, the shears machine was in use, accompanied by operation of a grab machine. A night-time survey was not undertaken as the waste facility is closed during night-time hours.

1.4 Waste licence W0233-01 does not specify noise measurement locations. Monitoring was therefore undertaken during both surveys at four measurement stations used during previous surveys as shown in **Appendix 3**. Two of these represent the nearest noise sensitive locations (NSLs). Measurement methodology, equipment specifications and weather conditions are described in **Appendix 4**. During the 'off' survey, measurement intervals of 30 minutes were used as specified in the site licence. Due to onsite logistics constraints attributable to the recently broken down shears machine, it was possible to operate the machine for only 1 hour and 10 minutes during the 'on' survey. It was therefore necessary to use shortened measurement intervals of 15 minutes on this occasion. As emissions from the shears machine and accompanying grab are relatively steady and continuous, noise levels recorded over 15 minutes are considered representative of those measured over 30 minutes.

2 Results & analysis

2.1 Noise levels recorded are presented in Appendix 5. Frequency spectra are shown in Appendix 6. Noise levels at all stations were dominated by offsite traffic noise.

2.2 During the survey of 04.09.09, when the shears machine was off, noise emissions from the Immark facility were audible sporadically at station N1 located near the site weighbridge. The noise environment at this location was dominated by offsite sources. The noise level specifically attributable to the Immark facility is estimated to lie between the measured $L_{AF90\ 30\ min}$ level (54 dB) and the $L_{Aeq\ 30\ min}$ level (63 dB). N1 is not a NSL, and therefore the noise limits specified in waste licence W0233-01 do not apply here.

2.3 Noise emissions from the Immark facility were not audible at stations N2, N3 or N4 during the survey of 04.09.9. Stations N3 and N4 represent the nearest NSLs to the site. It is concluded that facility emissions did not give rise to levels above 55 dB at these NSLs, and therefore levels were in compliance with the 55 dB daytime limit specified in the site licence.

2.4 The shears machine was operating during the survey of 17.09.09. During breaks in road traffic noise, emissions from waste processing activities at the Immark facility were audible at stations N1 and N2. Offsite noise sources were also significant at both stations, and were sufficiently continuous to influence the $L_{AF90\ 15\ min}$ parameter. It is concluded that facility emissions were most likely lower than the measured $L_{AF90\ 15\ min}$ levels (58 dB at N1 and 60 dB at N2). Neither station is a NSL.

2.5 No facility emissions were audible at stations N3 or N4 amidst the ambient noise on 17.09.09. The significantly loud ambient noise level gave rise to $L_{AF90\ 15\ min}$ levels of 56 and 52 dB at stations N3 and N4 respectively. The noise level specifically attributable to the Immark facility is likely to have been significantly lower than these $L_{AF90\ 15\ min}$ levels, and therefore lower than the 55 dB daytime limit specified in the site waste licence.

2.6 No tones or impulses were detected at the offsite NSLs arising from the waste facility. Emissions were therefore in compliance with Schedule B.4 of the licence.

3 Conclusions

3.1Noise limits specified in waste licence W0233-01 apply to the offsite NSLs N3 and N4. Noise emissions from the Immark facility were **not audible** at these stations during the surveys of 04.09.09 or 17.09.09. It is concluded that facility emissions were satisfactory and **in compliance** with the waste licence. In addition, **no tones or impulses** were noted.

3.2 The operation of the shears machine on 17.09.09 resulted in slightly louder facility emissions at the onsite stations N1 and N2, neither of which is a NSL. The increase in noise level was partly due to the shears machine itself. The increase was however chiefly attributable to the operation of the grab machine and manipulation of metal. The increase in emissions was **not audible** at the offsite NSLs N3 or N4, and it is concluded that **the operation of the shears did not give rise to any impact at these stations**.

Appendix 1: Glossary

Ambient	The total noise environment at a location, including all sounds present.
A-weighting	The weighting or adjustment applied to sound level recordings to approximate the non-linear frequency response of the human ear. The A-weighting is denoted by the suffix A in the parameters listed below such as L_{Aeq}, L_{A10}, etc.
Background noise	The A-weighted sound pressure level of the residual noise in decibels exceeded for 90% of a given time interval. The L_{A90}.
Decibel (dB)	The units of the noise measurement scale. Based on logarithmic scale so cannot be simply added or subtracted. A 3 dB difference is the smallest change perceptible to the human ear. A 10 dB difference is perceived as a doubling or halving of the sound level. **Throughout this report noise levels are presented as decibels relative to 20 µPa**. Examples of decibel levels are as follows:

20	Very quiet room	80	Busy pub
35	Rural environment at night	100	Nightclub
65	Conversation	120	Jet take-off

Free-field	Noise environment away from all surfaces other than the ground. Noise levels recorded near walls will be artificially increased due to reflections. Where there is more than one wall, noise levels will be further increased. Levels recorded within such 'near-field' conditions will be increased by up to 3 dB, and up to 6 dB near a corner. In practice, free-field conditions will be achieved by maintaining a separation distance of at least 3.5 m from walls.
Frequency	The number of cycles per second of a sound or vibration wave. An example of a low frequency noise is a hum, while a whine represents a higher frequency. The range of human hearing approaches 20-20,000 Hz.
Hertz (Hz)	The unit of frequency measurement.
Impulse	A noise which is of short duration, typically less than one second, the sound pressure level of which is significantly higher than the background.
Interval	The time period t over which noise monitoring is conducted. May be 5-60 minutes, depending on the standard applied. The interval is usually denoted by t as in $L_{Aeq\,t}$, $L_{A90\,t}$, etc.
L_{AE}	The sound exposure level is a measure of the noise level of an event, standardised to an interval of one second, and containing the same acoustical energy as the actual event.
$L_{Aeq\,t}$	The equivalent continuous sound level during a measurement interval, effectively representing the average A-weighted noise level.

L_{AF}	The A-weighted sound pressure level measured using a fast time weighting and averaged over one second. The L_{AF} value therefore changes each second.
L_{AIeq}	The A-weighted sound pressure level at a particular instant, measured using an impulse time weighting on the sound level meter. May be used in the assessment of impulse noise.
$L_{An\ t}$	The A-weighted sound level which is exceeded for n% of the measurement interval.
L_{Cpeak}	The peak C-weighted sound pressure level recorded during the measurement interval. The highest peak on the sound pressure wave before any time constant is applied. The C-weighting is used rather than the A-weighting as the latter screens out low frequency sources.
$L_{Req\ t}$	The rating noise level, derived from the $L_{Aeq\ t}$ plus specified adjustments for tonal and impulsive characteristics.
L_{den}	A description of the day-evening-night noise level. Calculated from separate daytime, evening and night-time noise levels using a specified formula.
$L_{AF10\ t}$	The A-weighted sound level measured using a fast time weighting which is exceeded for 10% of the measurement interval, usually used to quantify traffic noise.
$L_{AF90\ t}$	The A-weighted sound level measured using a fast time weighting which is exceeded for 90% of the measurement interval, usually used to quantify background noise. May also be used to describe the noise level from a continuous steady or almost-steady source, particularly where the local noise environment fluctuates.
Near-field	Area where free field conditions do not apply.
Noise sensitive location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
1/3 octave band analysis	Frequency analysis of sound such that the frequency spectrum is subdivided into bands of one third of an octave each. An octave is taken to be a frequency interval, the upper limit of which is twice the lower limit in Hertz.
Residual noise	The noise level remaining at a given position in a given situation when the specific noise source is absent or does not contribute to the noise level.
Specific noise	The noise source under investigation for assessing the likelihood of complaints.
Tone	A character of the noise caused by the dominance of one or more frequencies which may result in increased noise nuisance.

Appendix 2: Waste licence W0233-01 noise conditions

Condition 4.1: Noise

Noise from the facility shall not give rise to sound pressure levels (Leq,T) measured at noise sensitive locations of the facility which exceed the limit value(s).

Condition 6.10 Noise

The licensee shall carry out a noise survey of the site operations annually. The survey programme shall be undertaken in accordance with the methodology specified in the 'Environmental noise survey guidance document' as published by the Agency.

Schedule B.4: Noise emissions

Day dB(A) L_{Aeq} (30 minutes)	Night dB(A) L_{Aeq} (30 minutes)
55 Note 1	45 Note 1

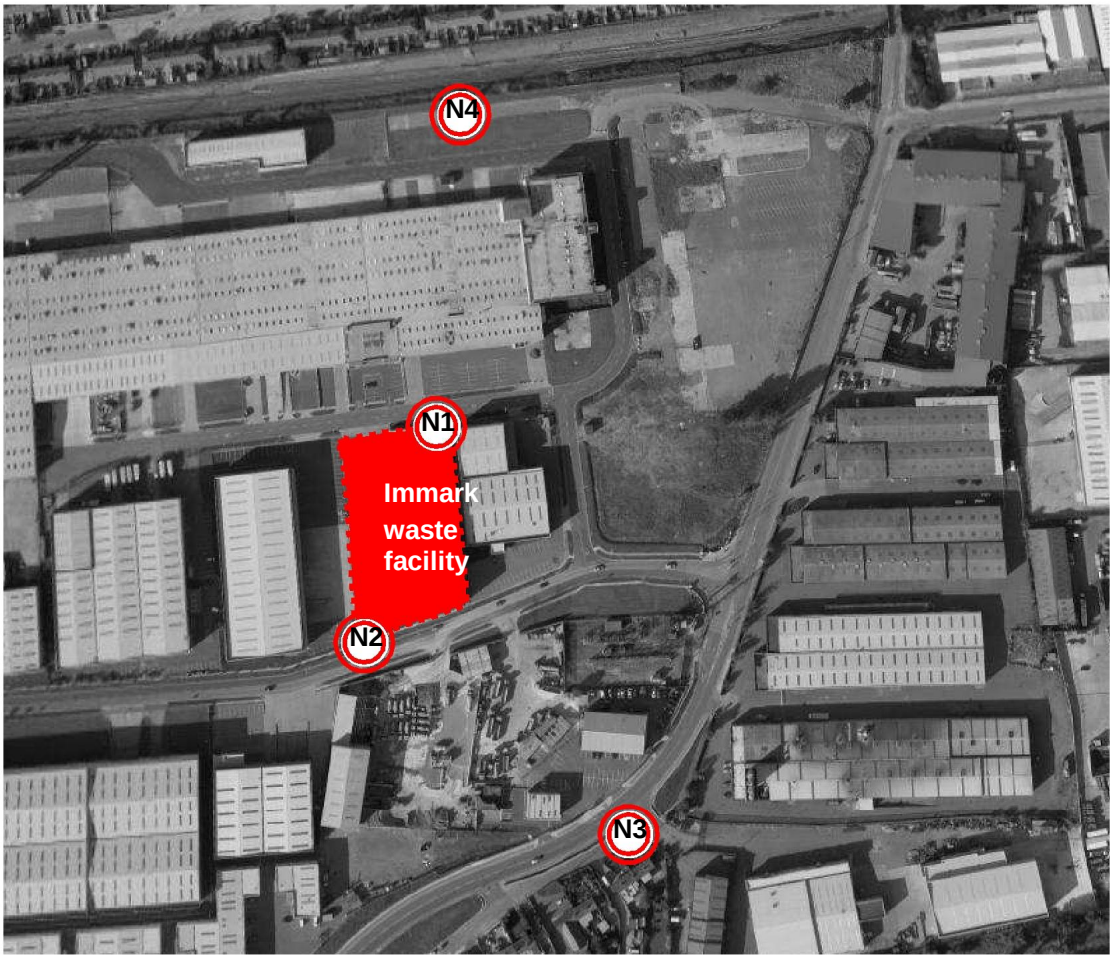
Note 1: There shall be no clearly audible tonal component or impulsive component in the noise emission from the activity at any noise sensitive location.

Schedule C.5: Noise monitoring

Parameter	Monitoring frequency	Analysis method/technique
$L_{Aeq\ 30\ min}$	Biannually	Standard Note 1
$L_{AF10\ 30\ min}$	Biannually	Standard Note 1
$L_{AF90\ 30\ min}$	Biannually	Standard Note 1
Frequency analysis (1/3 octave band analysis)	Biannually	Standard Note 1

Note 1: *International Standards Organisation ISO1996 Acoustics: Description and measurement of environmental noise Parts 1, 2 and 3.*

Appendix 3: Monitoring stations N



Appendix 4: Methodology

Survey	Project ref.	09125
	Purpose	Shears machine follow-up & compliance surveys
	Locations	N1 N2 N3 N4
	Comment	2 surveys undertaken, shears operating during 2nd
Event	Date	04.09.09 / 17.09.09
	Day	Friday / Thursday
	Time	Morning / Morning
Operator	On behalf of DixonBrosnan	Damian Brosnan both surveys
Conditions	Cloud cover	50 % / 90 %
	Precipitation	0 mm / 0 mm
	Temperature	12 ^{0}C / 14 ^{0}C
Wind	Direction	NW / E
	Speed	2-6 m/s / 0-2 m/s
	Measurement	Anemo anemometer 2 m above ground level
Sound level meter	Instrument	Bruel & Kjaer Type 2250-L
	Instrument serial no.	2566801
	Microphone serial no.	2571655
	Application	BZ7130 Version 2.0
	Bandwidth	Broadband
	Max input level	142.66 dB
	Broadband weightings	Time: Fast Frequency: AC
	Peak weighting	Frequency: C
	Windscreen correction	UA-0237
	Sound Field correction	Free-field
	UKAS calibration	30.09.08
	UKAS calibration certificate	Available on request
Onsite calibration	Time	04/09/2009 08:56:22 / 17/09/2009 07:52:23
	Calibration type	External
	Sensitivity	40.38 mV/Pa / 41.70 mV/Pa
	Post measurement check	93.9 dB
Onsite calibrator	Instrument	Bruel & Kjaer Type 4231
	Instrument serial no.	2342544
	UKAS calibration	30.09.08
	UKAS calibration certificate	Available on request
Monitoring methodology	International Standard ISO 1996	*Acoustics: Description and measurement of environmental noise Part 1 (2003) & Part 2 (2007)*
	Exceptions	-
	Intervals	30 min 04.09.09 / 15 min 17.09.09

Appendix 5: Noise data

Recorded 04.09.09

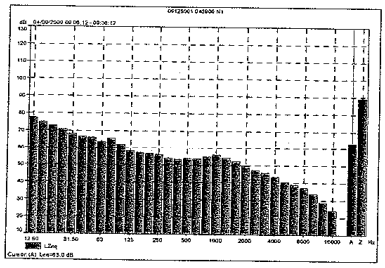
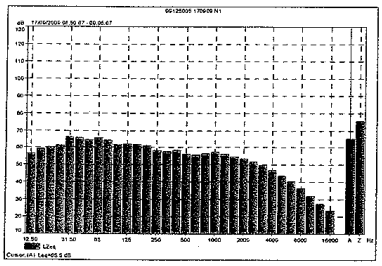
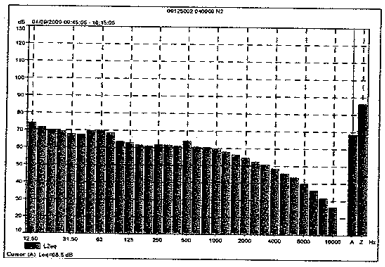
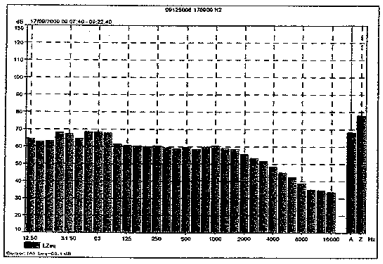
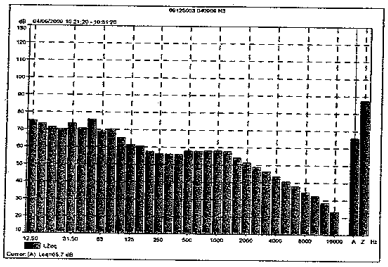
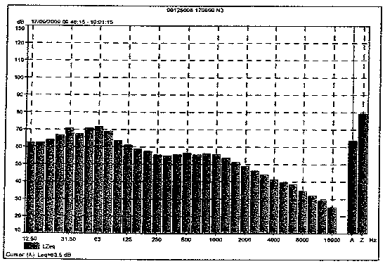
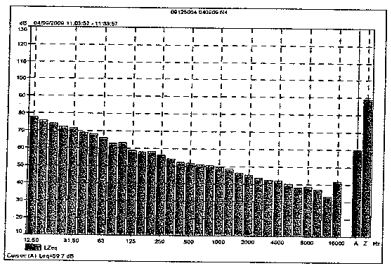
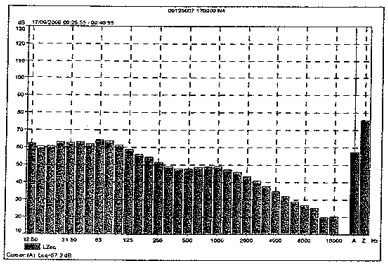
Station	Time	$L_{Aeq\ 30\ min}$ dB	$L_{AF10\ 30\ min}$ dB	$L_{AF90\ 30\ min}$ dB	Noise audible
N1	0906-0936	63	65	54	Sporadic emissions from within building audible through open roller shutter door, including FLT. Sporadic vehicle movements at onsite carpark. Offsite, intermittent noise audible through open RSD and opposite waste management facility. Intermittent vehicle movements on adjacent access road dominant when present. Public road traffic in distance continuously audible in background. Aircraft.
N2	0945-1015	69	72	60	No emissions audible from facility. Traffic on adjacent access road almost continuously present and dominant. Distant traffic audible during lulls. Continuous emissions audible from road sweeper truck operating at concrete facility across road. Sporadic traffic movements in adjacent carpark audible. Aircraft.
N3	1021-1051	66	68	61	No facility emissions audible. Traffic on adjacent road almost continuously dominant. Road sweeper truck operating at concrete facility across road continuously audible until 1025. Reversing alarms and PA system also audible at this site. Aircraft.
N4	1103-1133	60	60	51	No facility emissions audible. Sporadic emissions audible from nearest premises to N and W, in addition to traffic on nearest access road. Distant traffic continuously audible in background. Rustling vegetation. Aircraft. Sporadic train passbys.

Recorded 17.09.09

Station	Time	$L_{Aeq\ 30\ min}$ dB	$L_{AF10\ 30\ min}$ dB	$L_{AF90\ 30\ min}$ dB	Noise audible
N1	0850-0905	66	69	58	Grab and shears machine audible. Resulting waste management noise dominant during traffic lulls due to open RSD on facade. Partial screening provided by truck parked on weighbridge throughout interval. Reversing alarm on loader also audible. Intermittent traffic on access road dominant when present. 2 sources continuously audible in background: hum from premises opposite facility, and distant traffic.
N2	0907-0922	68	71	60	Almost continuous traffic on adjacent access road dominant. During lulls, waste operations audible at low level in Immark premises, from grab and shears engines, and manipulated metal. Emissions almost continuously arising from adjacent premises, and opposite concrete premises. Distant traffic audible.
N3	0946-1001	64	66	56	No emissions specifically audible from Immark facility, although distant commercial/industrial emissions audible continuously in background, in addition to continuous road traffic noise. Reversing alarms, road sweeper truck and process emissions audible continuously from concrete facility opposite.
N4	0925-0940	57	57	52	Distant commercial/industrial emissions audible from across commercial estate. No emissions specifically discernible from Immark facility. Continuous emissions from premises to E significant. Distant traffic noise also significant. Aircraft. Sporadic train passbys.

FLT: Forklift truck RSD: Roller shutter door PA: Public address

Appendix 6: Frequency spectra

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Unit 51
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Nangor Road
Dublin 12

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Inspector
Office of Environmental Enforcement
Environmental Protection Agency
Regional Inspectorate,
Mc Cumiskey House
Richview
Clonskeagh Road
Dublin 14

Date: 29th August 2009

Re: Quarterly Storm Water Monitoring April 2009Report for WO233-01

Dear Mr Howley,

Checking through the records for Parkwest it is not clear if these results were sent to the Agency. Due to a laboratory error the sampling results for December 2008 for boran, chromium, Potassium, sodium and zinc was not carried out. This analysis is included in this set of results.

Please find attached 3 copies of the quarterly storm water for Immark's Parkwest facility.

Yours Sincerely

Gabriel Kelly

Dr Gabriel Kelly MSc
Facility Manager

FRAOCH
environmental consulting

Your ref	
Our ref	TEC001
Direct line	052 55978 / 086 3348141
Fax	05255978
Email	heather.loughlin@fraoch.ie
Date	05 May 2009

Eugene O'Brien
Operations Supervisor
Immark Ltd
Unit 51
Park West Industrial Estate
Nangor Road
Dublin 12

Dear Eugene

Waste Licence WO233-01: Quarterly Storm Water Monitoring, April 2009

In accordance with the requirements of Schedule C2.3 of Waste Licence WO233-01, quarterly storm water monitoring was carried out at Immark on 17th April 2009. Samples were taken from SW1 and SW5.

Due to an incorrect suite of metals being analysed in the last annual sampling round in December 08, additional sampling for Boron, Chromium, Potassium, Sodium and Zinc was also carried out.

The analysis of the samples was carried out by Euro Environmental Services. Certificates of Analysis are included in Appendix 1.

Mineral oil levels of 214.38 ug/l and 31.27 ug/l were present in SW1 and SW5 respectively. These are elevated levels, but less than levels recorded in December 2008, which were 615.97 ug/l and 260.22 ug/l in SW1 and SW5 respectively.

Boron, Chromium, Potassium, Sodium and Zinc levels were present in acceptable levels.

Yours sincerely

H.M Loughlin

Heather Loughlin
Principal Consultant

crobane, kilienaute, thurles, county tipperary
www.fraoch.ie

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services

Environmental Science & Management
Water,Soil & Air Testing

Unit 35,
Boyne Business Park,
Drogheda,
Co. Louth
Ireland
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Fax: +353 41 9846171
Web: www.euroenv.ie
email: info@euroenv.ie

Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/006/01
		Date of Receipt	17/04/2009
		Date Testing Commenced	17/04/2009
		Received or Collected	Courier: Interlink
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	29/04/2009
Customer Ref	Techrec SW1 15/04/09	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Boron	177	ICPMS	<4.2	ug/L	
Chromium	177	ICPMS	5.5	ug/L	
COD	107	Colorimetry	16	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	214.38	ug/L	
Potassium	184	ICPMS	0.45	mg/L	UKAS
Sodium	184	ICPMS	<0.83	mg/L	UKAS
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	18	mg/L	
Zinc	177	ICPMS	225.0	ug/L	

Web Certificate ***Date : 29/04/2009***

Donna Heslin - Laboratory Manager

Acc. : Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C
Results shall not be reproduced, except in full, without the approval of EURO environmental services
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Fax: +353 41 9846171
Web: www.euroenv.ie
email: info@euroenv.ie

Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/006/02
		Date of Receipt	17/04/2009
		Date Testing Commenced	17/04/2009
		Received or Collected	Courier: Interlink
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	29/04/2009
Customer Ref	Techrec SW5 15/04/09	*Sample Type*	Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Boron	177	ICPMS	<4.2	ug/L	
Chromium	177	ICPMS	<0.93	ug/L	
COD	107	Colorimetry	9	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	31.27	ug/L	
Potassium	184	ICPMS	<0.35	mg/L	
Sodium	184	ICPMS	<0.83	mg/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	<3	mg/L	
Zinc	177	ICPMS	128.7	ug/L	

Web Certificate ***Date : 29/04/2009***

Donna Heslin - Laboratory Manager

Acc. : Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C

Results contained in this report relate only to the samples tested

Immark Ireland Limited
Unit 51
Parkwest Industrial Estate
Nangor Road
Dublin 12

To: Mr Donal Howley
Inspector
Office of Environmental Enforcement
Environmental Protection Agency
Regional Inspectorate,
Mc Cumiskey House
Richview
Clonskeagh Road
Dublin 14

Date: 29th August 2009

Re: Quarterly Storm Water Monitoring July 2009Report for WO233-01

Dear Mr Howley,
Please find attached 3 copies of the quarterly storm water for Immark's Parkwest facility.

Yours Sincerely

Gabriel Kelly

Dr Gabriel Kelly MSc
Facility Manager

FRAOCH
environmental consulting

Your ref	
Our ref	TEC001
Direct line	052 55978 / 086 3348141
Fax	052 91 55978
Email	heather.loughlin@fraoch.ie
Date	20 August 2009

Gabriel Kelly
Production Manager
Immark Ltd
Unit 14A1 Greenogue Business Park
Rathcoole
Co. Dublin

Dear Gabriel

Waste Licence WO233-01: Quarterly Storm Water Monitoring, July 2009

In accordance with the requirements of Schedule C2.3 of Waste Licence WO233-01 (Techrec), quarterly storm water monitoring was carried out at Immark on 31st July 2009. Samples were taken from SW1 and SW5.

The analysis of the samples was carried out by Euro Environmental Services. Certificates of Analysis are included in Appendix 1.

Mineral oil levels of <2.5 ug/l and 20.99 ug/l were present in SW1 and SW5 respectively. These are significantly less than levels recorded in April 2009, which were 214.38 ug/l and 31.27 ug/l in SW1 and SW5 respectively.

Yours sincerely

H.M Loughlin

Heather Loughlin
Principal Consultant

crohane, killenaule, thurles, county tipperary
www.fraoch.ie

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Fax: +353 41 9846171
Web: www.euroenv.ie
email info@euroenv.ie

A copy of this certificate is available on www.euroenv.ie

Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/007/01
		Date of Receipt	05/08/2009
		Date Testing Commenced	05/08/2009
		Received or Collected	Courier: Interlink
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	11/08/2009
Customer Ref	TECHREC SW1 29/07/09	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
COD (Surface Water)	107	Colorimetry	9	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	<2.5	ug/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	3	mg/L	

Signed : D Heslin ***Date :*** 11/08/09

Donna Heslin - Laboratory Manager

Acc. : Accredited Parameters by ISO 17025:2005

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Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/007/02
		Date of Receipt	05/08/2009
		Date Testing Commenced	05/08/2009
		Received or Collected	Courier: Interlink
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	11/08/2009
Customer Ref	TECHREC SW5 29/07/09	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
COD (Surface Water)	107	Colorimetry	12	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	20.99	ug/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	8	mg/L	

Signed : DHeslin ***Date :*** 11/08/09

Donna Heslin - Laboratory Manager

Acc. : Accredited Parameters by ISO 17025:2005

All organic results are analysed as received and all results are corrected for dry weight at 104 C

Results contained in this report relate only to the samples tested

File Copy
Sent 19/11/09.

Immark Ireland Limited
Unit 51
Parkwest Industrial Estate
Nangor Road
Dublin 12

To: Mr Donal Howley
Inspector
Office of Environmental Enforcement
Environmental Protection Agency
Regional Inspectorate,
Mc Cumiskey House
Richview
Clonskeagh Road
Dublin 14

Date: 19th of November 2009

Re: Quarterly Storm Water Monitoring for Waste License W0233-01, October 2009

Dear Mr Howley,

Please find attached three copies of the Quarterly Storm Water Monitoring Reports for October 2009.

If you require any further information please do not hesitate to contact me.

Yours Sincerely

Gabriel Kelly

Dr Gabriel Kelly MSc
Facility Manager

FRAOCH
environmental consulting

Your ref	
Our ref	TEC001
Direct line	052 55978 / 086 3348141
Fax	052 91 55978
Email	heather.loughlin@fraoch.ie
Date	17 November 2009

Gabriel Kelly
Production Manager
Immark Metals Ltd
Unit 51
Park West Industrial Estate
Nangor Road
Dublin 12

Dear Gabriel

Waste Licence WO233-01: Quarterly Storm Water Monitoring, October 2009

In accordance with the requirements of Schedule C2.3 of Waste Licence WO233-01 (Techrec), quarterly storm water monitoring was carried out at Immark on 30th October 2009. Samples were taken from SW1 and SW5.

The analysis of the samples was carried out by Euro Environmental Services. Certificates of Analysis are included in Appendix 1.

Average mineral oil levels for SW1 and SW5 are significantly decreased when compared to the previous two monitoring rounds, at 6.35 ug/l and 3.17 ug/l respectively.

Yours sincerely

H.M Loughlin

Heather Loughlin
Principal Consultant

crehane, kiltenaule thurles, county tipperary
www.fraoch.ie

FRAOCH
environmental consulting

Your ref	
Our ref	TEC001
Direct line	052 55978 / 086 3348141
Fax	052 91 55978
Email	heather.loughlin@fraoch.ie
Date	17 November 2009

Gabriel Kelly
Production Manager
Immark Metals Ltd
Unit 51
Park West Industrial Estate
Nangor Road
Dublin 12

Dear Gabriel

Waste Licence WO233-01: Quarterly Storm Water Monitoring, October 2009

In accordance with the requirements of Schedule C2.3 of Waste Licence WO233-01 (Techrec), quarterly storm water monitoring was carried out at Immark on 30th October 2009. Samples were taken from SW1 and SW5.

The analysis of the samples was carried out by Euro Environmental Services. Certificates of Analysis are included in Appendix 1.

Average mineral oil levels for SW1 and SW5 are significantly decreased when compared to the previous two monitoring rounds, at 6.35 ug/l and 3.17 ug/l respectively.

Yours sincerely

H.M Loughlin

Heather Loughlin
Principal Consultant

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www.fraoch.ie

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Fax: +353 41 9846171
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email info@euroenv.ie

A copy of this certificate is available on www.euroenv.ie

Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/009/01
		Date of Receipt	03/11/2009
		Date Testing Commenced	03/11/2009
		Received or Collected	Courier: Interlink
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	13/11/2009
Customer Ref	Techrec SW1 28/10/09	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
COD (Surface Water)	107	Colorimetry	9	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	6.35	ug/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	<2	mg/L	

Signed : D Heslin ***Date :*** 13/11/09

Donna Heslin - Laboratory Manager

Acc. : Accredited Parameters by ISO 17025:2005

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Results contained in this report relate only to the samples tested

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Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/009/02
		Date of Receipt	03/11/2009
		Date Testing Commenced	03/11/2009
		Received or Collected	Courier: Interlink
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	13/11/2009
Customer Ref	Techrec SW5 28/10/09	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
COD (Surface Water)	107	Colorimetry	9	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	3.17	ug/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	6	mg/L	

Signed : DHeslin ***Date :*** 13/11/09

Donna Heslin - Laboratory Manager

Acc. : Accredited Parameters by ISO 17025:2005

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Page 1 of 1

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Water,Soil & Air Testing

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Drogheda,
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Tel: +353 41 9845440
Fax: +353 41 9846171
Web: www.euroenv.ie
email: info@euroenv.ie

Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/010/01
		Date of Receipt	31/12/2009
		Date Testing Commenced	31/12/2009
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	08/01/2010
Customer Ref	Techrec SW1 29/12/09	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Boron (Surface Water)	177	ICPMS	184.2	ug/L	UKAS
Cadmium (Surface Water)	177	ICPMS	<0.01	ug/L	UKAS
Calcium	184	ICPMS	29.13	mg/L	
Chromium (Surface Water)	177	ICPMS	0.8	ug/L	UKAS
COD (Surface Water)	107	Colorimetry	17	mg/L	UKAS
Copper (Surface Water)	177	ICPMS	<0.21	ug/L	UKAS
Iron (Surfacewater)	177	ICPMS	472.3	ug/L	UKAS
Lead (Surface Water)	177	ICPMS	<0.02	ug/L	UKAS
Magnesium	184	ICPMS	<0.55	mg/L	
Manganese (Surface Water)	177	ICPMS	135.3	ug/L	UKAS
Mercury	178	ICPMS	<0.03	ug/L	
Mineral Oil by Calculation	189	GC-FID	155.21	ug/L	
Nickel (Surface Water)	177	ICPMS	0.8	ug/L	UKAS
Potassium	184	ICPMS	0.90	mg/L	
SemiVolatile Organic Compounds	155	GCMS	<0.5	ug/L	
Sodium	184	ICPMS	3.70	mg/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	13	mg/L	
Volatile Organic Compounds	154	GCMS	<1	ug/L	
Zinc (Surface Water)	177	ICPMS	4.2	ug/L	UKAS

Web Certificate ***Date : 08/01/2010***

Donna Heslin - Laboratory Manager

Acc. : Accredited Parameters by ISO 17025:2005

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Web: www.euroenv.ie
email: info@euroenv.ie

Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/010/02
		Date of Receipt	31/12/2009
		Date Testing Commenced	31/12/2009
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	08/01/2010
Customer Ref	Techrec SW5 29/12/09	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Boron (Surface Water)	177	ICPMS	69.9	ug/L	UKAS
Cadmium (Surface Water)	177	ICPMS	<0.01	ug/L	UKAS
Calcium	184	ICPMS	4.98	mg/L	
Chromium (Surface Water)	177	ICPMS	<0.58	ug/L	UKAS
COD (Surface Water)	107	Colorimetry	10	mg/L	UKAS
Copper (Surface Water)	177	ICPMS	<0.21	ug/L	UKAS
Iron (Surfacewater)	177	ICPMS	132	ug/L	UKAS
Lead (Surface Water)	177	ICPMS	3.6	ug/L	UKAS
Magnesium	184	ICPMS	1.57	mg/L	
Manganese (Surface Water)	177	ICPMS	<0.96	ug/L	UKAS
Mercury	178	ICPMS	<0.03	ug/L	
Mineral Oil by Calculation	189	GC-FID	280.77	ug/L	
Nickel (Surface Water)	177	ICPMS	<0.27	ug/L	UKAS
Potassium	184	ICPMS	0.39	mg/L	
SemiVolatile Organic Compounds	155	GCMS	<0.5	ug/L	
Sodium	184	ICPMS	5.55	mg/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	132	mg/L	
Volatile Organic Compounds	154	GCMS	<1	ug/L	
Zinc (Surface Water)	177	ICPMS	8.3	ug/L	UKAS

Web Certificate ***Date : 08/01/2010***

Donna Heslin - Laboratory Manager

Acc. : Accredited Parameters by ISO 17025:2005

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Results contained in this report relate only to the samples tested

Appendix 2: New Procedures

16 Contents

1. Purpose

The purpose of this procedure is to define the nature and procedure for accepting metals and WEEE at the Parkwest facility.

2. Responsibility

It is the responsibility of all Operations personnel to ensure that the materials accepted in the facility conform to this procedure.

3. Types of Waste

The two waste streams currently accepted at the Parkwest facility are Metals and WEEE.

Acceptance of Waste Electronic and Electrical Equipment

4. Conditions for accepting WEEE

Waste electronics are only accepted with the correct paperwork. The weighbridge operator must ensure that each load is fully booked in before it is unloaded. The Operators unloading must ensure that load is checked before unloading.

> No Loads are to be accepted at the facility without the correct documentation. This includes C1 forms for Hazardous materials such as CRT or Fridges.

Customer details are recorded in the WE^3 ©system. All loads entering the facility are weighed on the weighbridge.

Materials or loads without the appropriate documentation will be returned to the customer.

5. Details to be Recorded

All WEEE deliveries must be recorded in the Waste in Logbook. The following details are to be recorded and maintained on site for inspection:

WEEE Delivery Details

1. Date and time of delivery
2. Collection Site
3. WEEE Type
4. Gross Weight and Adjusted weight (weight of materials minus packaging)
5. Registration Number
6. Collector
7. Initials of receiving Operator

The Administrator or weighbridge operator must enter the details of each load on the WE^3 © system once the load has been accepted.

6. Types of WEEE to be accepted

The following WEEE codes

EWC code	*Description*
16 02	*wastes from electrical and electronic equipment*
*16 02 10**	*discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09*
*16 02 11**	*discarded equipment containing chlorofluorocarbons, HCFC, HFC*
*16 02 12**	*discarded equipment containing free asbestos*
*16 02 13**	*discarded equipment containing hazardous components (1) other than those mentioned in 16 02 09 to 16 02 12*
16 02 14	*discarded equipment other than those mentioned in 16 02 09 to 16 02 13*
16 02 15	*hazardous components removed from discarded equipment*

*20 01 23**	*discarded equipment containing chlorofluorocarbons*
*20 01 35**	*discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components*

WEEE will only be accepted between the following hours:

Monday to Friday 07:30 – 16:00

These hours may be adjusted by agreement with the facility manger.

Please note that the license allows for the acceptance of waste for the following times:

Monday to Friday 07:00 – 20:30
Saturday 07:00 – 17:30

Acceptance of Metals at the Parkwest Facility

7. Conditions for Acceptance of Metals

Metals will only be accepted from the following EWC code list. It is the responsibility of the Weighbridge operator to ensure that the metals deliveries to the facility conform to these approved code. The metals business is operated by A1 Metals, One51 plc company.

A1 metals personnel must ensure that all materials entering the site conform to these codes.

Any deviation is to be notified to the facility manger immediately.

Materials deviating from these codes are to be quarantined or rejected.

EWC Code	*Description*
02 01 10	*Waste metal from Agriculture, Horticulture, Aquaculture, forestry, hunting, fishing, food preparation and processing*
12 01 01	*Ferrous metal filings and turnings*
12 01 03	*Non-ferrous metal filings and turnings*
15 01 04	*Metallic Packaging*
16 06 05	*Composite Packaging*
*16 06 01**	*Lead batteries*
17 04 01	*Copper, bronze and brass from Construction and Demolition Waste*
17 04 02	*Aluminium from Construction and Demolition Waste*
17 04 03	*Lead Construction and Demolition Waste*
17 04 04	*Zinc from Construction and Demolition Waste*
17 04 05	*Iron and steel*
17 04 06	*Tin*
17 04 07	*Mixed Metals*
19 01 02	*Ferrous materials removed from bottom ash*
19 10 01	*Iron and steel from shredding of metal containing waste*
19 10 02	*Non ferrous from shredding of metal containing waste*
19 12 02	*Ferrous Metal*
19 12 03	*Non-Ferrous Metal*
20 01 40	*Metals separated out from municipal, household and commercial waste*

8. Details to be recorded

All Metals deliveries must be recorded in the Waste In Logbook. The following details are to be recorded and maintained on site for inspection:

Metals Delivery Details

1. Date and time of delivery

2. Customer details
3. Net Weight

The Administrator or weighbridge operator must enter the details of each load. Each week a report of the metals deliveries is sent to the Facility Manager.

9. *Referenced Documents*

Document	Location
Waste In Logbook	Immark Office and A1 Office
PW- Non-Conformance Reporting	

10. *Training and Distribution*

All Immark and A1 Metals employees involved in the operation of the Parkwest facility are to be trained in this procedure.

11. *Reason for Revision*

12. *Approvals*

This procedure is approved and forms part of the Parkwest management system.

Approved By: _____ Dr Gabriel Kelly Immark Facility Manager

Approved By: _____ Tommy Ward General Manger A1 Metals

Approved By: _____ Karen Fahy Group E,H&S Manager

	Procedure Title:	*Facility Security and Visitor Arrangements*		
	Procedure No:	*PW-202*	*Date:*	*September 09*
	Revision No:	*0*	*Pages:*	*3*

Contents

1. Purpose

This procedure describes the requirements for Visitors to Immark Metals and A1 Metals at the One51 ES Metals facility in Parkwest. As there are many traffic movements in and out of the building it is necessary to control access and identify visitors for security and health and safety. This procedure does not included delivery drivers

.

2. Responsibility

It is the responsibility of all staff to ensure that all visitors are escorted on site and that they have complied with this procedure.

3. Visitor Sign and Tags

The following must be carried out as a minimum:

- All visitors must report to reception in the main office before being allowed on site
- All visitors must sign in and be issued with a Visitor Tag. (*Note for the moment the Techrec tags are being used*)
- Visitors must be accompanied once they leave the main office
- Visitors are to be informed of safety requirements, High vis jackets or vests etc
- Any camera equipment is to be declared before recording is allowed on site.
- Recording of waste processing is restricted to certain areas only. General recording is not allowed.

4. Referenced Documents

5. Training and Distribution

All staff working in the Parkwest facility must be trained in this procedure.

6. Reason for Revision

This is an original document

7. Approvals

This procedure is approved and forms part of the One 51 ES Metals (Parkwest) management system.

Approved By: _____ Dr Gabriel Kelly Immark Facility Manager

Approved By: _____ Tommy Ward General Manger A1 Metals

Approved By: _____ Karen Fahy Group E,H&S Manager

Appendix 3: AER Returns Worksheet

| PRTR# : W0233 | Facility Name : Immark Ireland Ltd | Filename : W0233_2009.xls | Return Year : 2009 |

AER Returns Worksheet

Version 1.1.10

REFERENCE YEAR	2009

1. FACILITY IDENTIFICATION

Parent Company Name	Immark Ireland Limited
Facility Name	Immark Ireland Ltd
PRTR Identification Number	W0233
Licence Number	W0233-01

Waste or IPPC Classes of Activity

No.	class_name
4.3	Recycling or reclamation of metals and metal compounds.
4.13	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.

Address 1	Unit 51
Address 2	Park West Industrial Estate
Address 3	Nangor Road
Address 4	Dublin 12
Country	Ireland
Coordinates of Location	-6.35806 53.3333
River Basin District	IEEA
NACE Code	3832
Main Economic Activity	Recovery of sorted materials
AER Returns Contact Name	Gerard Killen
AER Returns Contact Email Address	loshea@techrec.ie
AER Returns Contact Position	
AER Returns Contact Telephone Number	01 620 4300
AER Returns Contact Mobile Phone Number	
AER Returns Contact Fax Number	
Production Volume	0.0
Production Volume Units	
Number of Installations	0
Number of Operating Hours in Year	0
Number of Employees	0
User Feedback/Comments	
Web Address	

2. PRTR CLASS ACTIVITIES

Activity Number	Activity Name
5(a)	Installations for the recovery or disposal of hazardous waste
50.1	General

3. SOLVENTS REGULATIONS (S.I. No. 543 of 2002)

Is it applicable?	
Have you been granted an exemption ?	
If applicable which activity class applies (as per Schedule 2 of the regulations) ?	
Is the reduction scheme compliance route being used ?	

Sheet : Releases to Air

AER Returns Worksheet

27/7/2010 16:43

4.1 RELEASES TO AIR

SECTION A : SECTOR SPECIFIC PRTR POLLUTANTS

| PRTR# : W0233 | Facility Name : Immark Ireland Ltd | Filename : W0233_2009.xls | Return Year : 2009 |

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RELEASES TO AIR								
POLLUTANT		METHOD				QUANTITY		
No. Annex II	Name	M/C/E	Method Used: Method Code	Method Used: Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
19	Chromium and compounds (as Cr)	E			0	0.0	0.0	0.0
22	Nickel and compounds (as Ni)	E			0.006	0.006	0.0	0.0
					0.0075	0.0075	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

SECTION B : REMAINING PRTR POLLUTANTS

RELEASES TO AIR								
POLLUTANT		METHOD				QUANTITY		
No. Annex II	Name	M/C/E	Method Used: Method Code	Method Used: Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
					0.0	0.0	0.0	0.0
					0.0	0.0	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

SECTION C : REMAINING POLLUTANT EMISSIONS (As required in your Licence)

RELEASES TO AIR								
POLLUTANT		METHOD				QUANTITY		
Pollutant No.	Name	M/C/E	Method Used: Method Code	Method Used: Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
210	Dust	E			4.1	4.1	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

Additional Data Requested from Landfill operators

For the purposes of the National Inventory on Greenhouse Gases, landfill operators are requested to provide summary data on landfill gas (Methane) flared or utilised on their facilities to accompany the figures for total methane generated. Operators should only report their Net methane (CH4) emission to the environment under T(total) KG/yr for Section A: Sector specific PRTR pollutants above. Please complete the table below:

Landfill: Immark Ireland Ltd

Please enter summary data on the quantities of methane flared and / or utilised

	T (Total) kg/Year	M/C/E	Method Used: Method Code	Method Used: Designation or Description	Facility Total Capacity m3 per hour	
Total estimated methane generation (as per site model)						
Methane flared	0.0				N/A	
Methane utilised in engine/s	0.0				0.0	(Total Flaring Capacity)
Net methane emission (as reported in Section A above)	0.0				0.0	(Total Utilising Capacity)
	0.0				N/A	

4.2 RELEASES TO WATERS

Data on ambient monitoring of storm/surface water or groundwater, conducted as part of your licence requirements, should NOT be submitted under AER / PRTR Reporting as this onl

SECTION A : SECTOR SPECIFIC PRTR POLLUTANTS

RELEASES TO WATERS								
POLLUTANT			Method Used			QUANTITY		
No. Annex II	Name	M/C/E	Method Code	Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
						0.0	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

SECTION B : REMAINING PRTR POLLUTANTS

RELEASES TO WATERS								
POLLUTANT			Method Used			QUANTITY		
No. Annex II	Name	M/C/E	Method Code	Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
						0.0	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

SECTION C : REMAINING POLLUTANT EMISSIONS (as required in your Licence)

RELEASES TO WATERS								
POLLUTANT			Method Used			QUANTITY		
Pollutant No.	Name	M/C/E	Method Code	Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
						0.0	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

Sheet : Releases to Land

AER Returns Worksheet

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4.4 RELEASES TO LAND

[PRTR# : W0233] Facility Name : Immark Ireland Ltd] Filename : W0233_2009.xls] Return Year : 2009]

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SECTION A : PRTR POLLUTANTS

RELEASES TO LAND								
POLLUTANT			METHOD			QUANTITY		
No. Annex II	Name	M/C/E	Method Used		Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	
			Method Code	Designation or Description				
						0.0	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

SECTION B : REMAINING POLLUTANT EMISSIONS (as required in your Licence)

RELEASES TO LAND								
POLLUTANT			METHOD			QUANTITY		
Pollutant No.	Name	M/C/E	Method Used		Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	
			Method Code	Designation or Description				
						0.0	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

Sheet:: Releases to Wastewater or Sewer

AER Returns Worksheet

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4.3 RELEASES TO WASTEWATER OR SEWER

SECTION A : PRTR POLLUTANTS

[PRTR# : W0233 | Facility Name : Immark Ireland Ltd | Filename : W0233_2009.xls | Return Year 27/07/2010 15:52

OFFSITE TRANSFER OF POLLUTANTS DESTINED FOR WASTE-WATER TREATMENT OR SEWER

POLLUTANT			METHOD		QUANTITY			
No. Annex II	Name	M/C/E	Method Used		Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
			Method Code	Designation or Description				
						0.0	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

SECTION B : REMAINING POLLUTANT EMISSIONS (as required in your Licence)

OFFSITE TRANSFER OF POLLUTANTS DESTINED FOR WASTE-WATER TREATMENT OR SEWER

POLLUTANT			METHOD		QUANTITY			
Pollutant No	Name	M/C/E	Method Used		Emission Point 1	T (Total) KG/Year	A (Accidental) KG/Year	F (Fugitive) KG/Year
			Method Code	Designation or Description				
						0.0	0.0	0.0

* Select a row by double-clicking on the Pollutant Name (Column B) then click the delete button

5. ONSITE TREATMENT & OFFSITE TRANSFERS OF WASTE

| PRTR# : W0233 | Facility Name : Immark Ireland Ltd | Filename : W0233_2009.xls | Return Year : 2009 |

Transfer Destination	European Waste Code	Hazardous	Quantity (Tonnes per Year)	Description of Waste	Waste Treatment Operation	Method Used: M/C/E	Method Used: Method Used	Location of Treatment	Haz Waste : Name and Licence/Permit No of Next Destination Facility : Non Haz Waste: Name and Licence/Permit No of Recover/Disposer	Haz Waste : Address of Next Destination Facility : Non Haz Waste: Address of Recover/Disposer	Name and License / Permit No. and Address of Final Recoverer / Disposer (HAZARDOUS WASTE ONLY)	Actual Address of Final Destination i.e. Final Recovery / Disposal Site (HAZARDOUS WASTE ONLY)
To Other Countries	16 02 11	Yes	1095.28	discarded equipment containing CFC units	R13	M	Weighed	Abroad	TechRec (NI) Limited,LN/04/07A	110 Trewmount Road,Killyman,Dungannon, BT71 7EF,Ireland	Techrec (NI) Limited,LN/04/07A,110 Tremount Road,Killyman,Dungannon, BT71 7EF,Ireland	110 Tremount Road,Killyman,Dungannon, BT71 7EF,Ireland
Within the Country	16 02 13	Yes	77.525	discarded equipment containing hazardous components	R13	M	Weighed	Offsite in Ireland	Immark Ireland Limited,W165-1	Unit 14 A1,Greenogue Business Park,Rathcoole,Dublin,Ireland	Recycling Village,WP2004/15,Unit 4a,Tenure Business Park,Monasterboice,Drogheda,Ireland	Unit 4a,Tenure Business Park,Monasterboice,Drogheda,Ireland
Within the Country	16 02 15	Yes	4.803	hazardous components removed from discarded equipment	R13	M	Weighed	Offsite in Ireland	Rehab Recycling,WPR33/2	77 Broomhill Road,,Tallaght,Dublin,Ireland	Rehab Recycling,WPR33/2,77 Broomhill Road,,Tallaght,Dublin,Ireland	77 Broomhill Road,,Tallaght,Dublin,Ireland
Within the Country	16 02 13	Yes	42.68	discarded equipment containing hazardous components	R13	M	Weighed	Offsite in Ireland	Recycling Village,WP2004/15	Unit 4a,Tenure Business Park,Monasterboice,Drogheda,Ireland	Recycling Village,WP2004/15,Unit 4a,Tenure Business Park,Monasterboice,Drogheda,Ireland	Unit 4a,Tenure Business Park,Monasterboice,Drogheda,Ireland
To Other Countries	16 02 13	Yes	1`.807	discarded equipment containing hazardous components	R13	M	Weighed	Abroad	Global Environmental Recycling,EAWML/50120/M02	Unit D,Campbeltown Road, Birkenhead Wirral,CH41 9HP,United Kingdom	Global Environmental Recycling Ltd,EAWML/50120/M02,Unit D,Maritime Business Park,Campbeltown Road Birkenhead Wirral,CH41 9HP,United Kingdom	Unit D,Maritime Business Park,Campbeltown Road Birkenhead Wirral,CH41 9HP,United Kingdom
To Other Countries	16 02 14	No	1`0.34	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	R4	M	Weighed	Abroad	The Remet Company,80115	9 Cody Business Centre,Cody Road,London,E16 4SR,Ireland		
Within the Country	16 02 14	No	738.2	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	R4	M	Weighed	Offsite in Ireland	A1 Metals Limited,WMP007/D	Acragar,,Mountmellick,County Laois,Ireland		
To Other Countries	16 02 14	No	1.6	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	R4	M	Weighed	Abroad	BMI UK limited,D53	London End Farm,Keysoe ,Beds,MK44 2JD,United Kingdom		
To Other Countries	16 02 16	No	34.59	components removed from discarded equipment other than those mentioned in 16 02 15	R4	M	Weighed	Abroad	Converge International,7017/F	50 Bonham Strand,,Sheung Wan,Hong Kong,China		
Within the Country	16 02 14	No	0.66	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	R4	M	Weighed	Offsite in Ireland	Greenstar Recycling and Recovery Ltd,W0183-01	Millennium Business Park,,Ballycoolin,Dublin11,Ireland		
Within the Country	16 02 14	No	91.44	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	R4	M	Weighed	Offsite in Ireland	Hegarty Metals Limited,WP05/04	Ballysimon Road,,Limerick,,Ireland		
To Other Countries	16 02 14	No	77.34	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	R4	M	Weighed	Abroad	Interrec BV,INT-080326-EML-1124-RK	2 Korte Beemd,4-6 Helmond,,5705 NL,Netherlands		
Within the Country	16 06 01	Yes	43.69	Lead batteries	R13	M	Weighed	Offsite in Ireland	Rialta Environmental Limited,W0192-01	Block 402,Greenogue Business Park,Rathcoole,County Dublin,Ireland	H J Enthoven,BL5598,Darley Dale,Matlock,Derbyshire,DB 23 Lp,United Kingdom	Darley Dale,Matlock,Derbyshire,DB 23 Lp,United Kingdom
Within the Country	16 02 14	No	77.86	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	R4	M	Weighed	Offsite in Ireland	A1 Metals Limited,WMP007/D	Acragar,,Mountmellick,County Laois,Ireland		

Sheet : Treatment Transfers of Waste

AER Returns Worksheet

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Transfer Destination	European Waste Code	Hazardous	Quantity (Tonnes per Year)	Description of Waste	Waste Treatment Operation	Method Used M/C/E	Method Used	Location of Treatment	Haz Waste : Name and Licence/Permit No of Next Destination Facility Non Haz Waste: Name and Licence/Permit No of Recover/Disposer	Haz Waste : Address of Next Destination Facility : Non Haz Waste: Address of Recover/Disposer	Name and License / Permit No. and Address of Final Recoverer / Disposer (HAZARDOUS WASTE ONLY)	Actual Address of Final Destination i.e. Final Recovery / Disposal Site (HAZARDOUS WASTE ONLY)
Within the Country	17 04 01	No	345.99	copper, bronze, brass	R4	M	Weighed	Offsite in Ireland	A1 Metals Limited,WMP007/D	Acragar,,,Mountmellick,County Laois,Ireland		
Within the Country	19 12 02	No	248.28	Ferrous	R4	M	Weighed	Offsite in Ireland	A1 Metals Limited,WMP007/D	Acragar,,,Mountmellick,County Laois,Ireland		
To Other Countries	19 12 02	No	3.13	Ferrous	R4	M	Weighed	Abroad	The Remet Company,80115	9 Cody Business Centre,Cody Road,London,E16 4SR,Ireland		
To Other Countries	19 12 02	No	141.77	Ferrous	R4	M	Weighed	Abroad	S. Norton,WML30195/M01	Bankfield House,Bankfield Hill Regent Road,Liverpool,L20 8RQ,United Kingdom		
To Other Countries	19 12 03	No	53.0	Non-Ferrous Metals	R4	M	Weighed	Abroad	Converge International,701 7/F	50 Bonham Strand,,Sheung Wan,Hong Kong,China		
To Other Countries	19 12 03	No	31.48	Non-Ferrous Metals	R4	M	Weighed	Abroad	Interrec BV,INT-080326-EML-1124-RK	2 Korte Beemd,4-6 Hellmond,,,5705 NL,Netherlands		
To Other Countries	19 12 03	No	304.17	Non-Ferrous Metals	R4	M	Weighed	Abroad	The Remet Company,80115	9 Cody Business Centre,Cody Road,London,E16 4SR,Ireland		
To Other Countries	19 12 04	No	212.09	Plastics	R3	M	Weighed	Abroad	Eurokey Recycling,BC4/002867&8	Quartz close,Warrens Industrial Res.,Enderby Leicaster,LE19 4SG,United Kingdom		
Within the Country	19 12 04	No	129.83	Plastics	R3	M	Weighed	Offsite in Ireland	Greenstar Recycling and Recovery Ltd,W0183-01	Millennium Business Park,,,Ballycoolin,Dublin11,Ireland		
Within the Country	19 12 04	No	0.55	Plastics	R3	M	Weighed	Offsite in Ireland	Immark Ireland Limited,W185-1	Unit 14 A1,Greenogue Business Park,Rathcoole,Dublin,Ireland		
To Other Countries	19 12 04	No	104.24	Plastics	R3	M	Weighed	Abroad	Roydon Polythene,EAWML60433	Fieldhouse Industrial Estate,Rochdale ,Lancs.,OL12 0AA,United Kingdom		
To Other Countries	19 12 04	No	30.11	Plastics	R3	M	Weighed	Abroad	WRC Recycling,D4482	Auchans Farm,,,Johnstown,PA67EE,United Kingdom		
Within the Country	19 12 12	No	185.78	other wastes (including mixtures of materials) from mechanical treatment of waste other than those mentioned in 19 12 11	D1	M	Weighed	Offsite in Ireland	Greenstar Recycling and Recovery Ltd,W0183-01	Millennium Business Park,,,Ballycoolin,Dublin11,Ireland		
Within the Country	20 01 40	No	2637.6	Metals	R4	M	Weighed	Offsite in Ireland	A1 Metals Limited,WMP007/D	Acragar,,,Mountmellick,County Laois,Ireland		

* Select a row by double-clicking the Description of Waste then click the delete button