

Annual Environmental Report 2009

Immark Ireland Ltd (Formerly Cedar Resource Management Ltd),

Licence Number W0185-01

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1. Introduction

This report details the licensee's compliance with the requirements of Waste Licence; register reference No W0185-01 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.

Note: As a result of the loss of business from the largest WEEE Compliance scheme in Ireland a decision was made in December 2008 to cease the processing of WEEE at the Greenogue facility. The licence was transferred to Rilta Environmental Ltd in February 2010.

Licensed Facility

The licensed facility registered reference no. W0185-01.

Name and Location

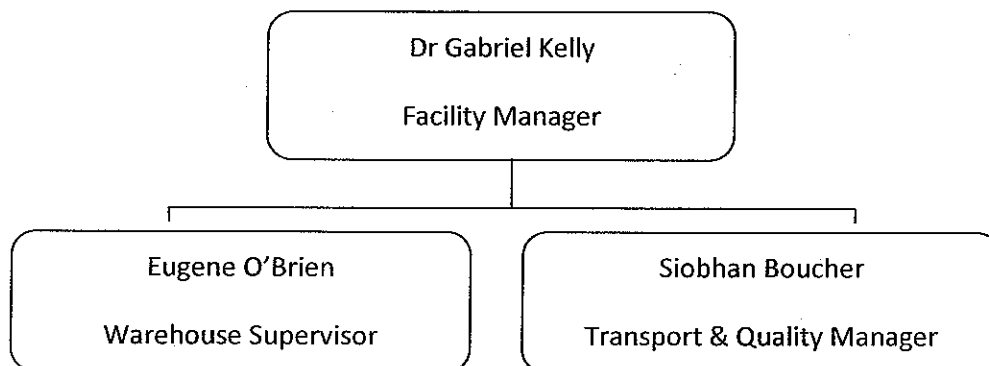
The AER is that of:

Immark Ireland Ltd (Formerly Cedar Resource Management Ltd.)
Cedar House,
Unit 14A1 Greenogue Business Park,
Rathcoole,
Co. Dublin.

Company Environmental Policy

Refer to **Appendix 1** for a copy of the Company environmental policy. The company is accredited to ISO 14001. The auditing body is SGS Ireland.

Company Organisational Chart for Environmental Management



Reporting Period

The reporting period is 1st January 2009 to 30th September 2009.

2. Waste Activities carried out at the Facility

Introduction

The following is the list of waste activities permitted under W0185-01. Please note that only Classes 3, 12 and 13 from the Fourth Schedule are carried out at the facility at present as the facility only accepts WEEE Waste. The WEEE plant was fully decommissioned in May 2009. Full trailers of Fridges and CRT/Monitors were dispatched via the Greenogue facility until September 2009 as there was a valid TFS documentation in place. No other WEEE waste was received at this facility after 22nd May 2009.

Activities in accordance with the Third Schedule of the Waste Management Act, 1996

Class 7. Physico-chemical treatment not referred to elsewhere in this Schedule (including evaporation, drying and calcination) which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1. to 10. of this Schedule:

This activity relates to the shredding of waste materials, including, household hazardous waste containers and metals, plastics, card and paper. Physico-chemical treatment may be carried out on effluents to meet discharge criteria.

Class 11. Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule. This activity relates to bulking-up of waste on-site prior to shipment of waste for disposal off-site.

Class 12. Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule. This activity relates to the baling and repackaging of various waste types prior to disposal off-site.

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. This activity relates to the storage of hazardous and non-hazardous waste at the facility prior to disposal off-site.

Activities in accordance with the Fourth Schedule of the Waste Management Act, 1996

Class 2. Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes): This activity relates to the recycling of various organic substances including, wood, paper/cardboard, textile materials and vegetable oils.

Class 3. Recycling or reclamation of metals and metal compounds: This activity relates to the dismantling, shredding, baling and recycling of various metal wastes.

Class 4. Recycling or reclamation of other inorganic materials: This activity is limited to the reclamation of refrigerator gasses.

Class 11. Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule: This activity is to make provision for the acceptance on-site for transfer to an appropriate facility of waste that has been obtained from any activity referred to previously in the schedule.

Class 12. Exchange of waste for submission to any activity referred to in a preceding paragraph of this Schedule: This activity refers to the exchange of certain waste types and their packaging for further processing off-site

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 is limited to the storage of waste at the facility prior to off-site recovery.

3. Wastes Managed

See:

Appendix 2 – Waste Received

Appendix 3 - On site Treatment and Off Site Transfer of Waste

4. Report on Emissions/Results and interpretations of environmental Monitoring

Immark implements a comprehensive environmental monitoring programme to assess the significance of emissions from site activities. The programme includes surface water, groundwater, wastewater, noise and dust monitoring. The monitoring locations are shown on drawing 569-42-G006 in Appendix 4. The monitoring results are submitted to the EPA at quarterly intervals. An overview of the results of the monitoring is presented in this Section, with summary data in tables included in Appendix 5.

Surface Water Quality Monitoring

Surface water monitoring was conducted quarterly at one monitoring point at the location shown on drawing 569-42-G006 in Appendix 2. Surface water runoff from the facility is dependent on rainfall. The sampling and analysis was carried out in accordance with recognised quality assurance and control procedures. The range of analysis was as specified in Schedule D of the Waste Licence and included pH, Chemical Oxygen Demand (COD) and electrical conductivity. There are no emission limit values (ELV) or trigger levels set in the Licence and so the results were compared to the proposed Environmental Quality Standards (EQS) for surface waters prepared by the Agency. The summary tables are included in **Appendix 5**.

The pH and conductivity measurements indicate the water is of good quality and has not been impacted by site activities. The results are consistent with the levels recorded in previous monitoring events.

Wastewater Monitoring

The facility is designed to collect waste water from floor wash downs in the Warehouse building and discharge it to the municipal sewer serving the industrial estate. However as putrescible wastes are not accepted at the facility and floor wash downs are therefore not required there is no wastewater discharge to sewer.

Groundwater Monitoring

Groundwater monitoring was conducted quarterly at two monitoring points (GW-1 and GW-2) as shown on drawing 569-42-G006 in Appendix 2. The sampling and analysis was carried out in accordance with recognised quality assurance and control procedures. The range of analysis was as specified in Schedule D of the Waste Licence and included quarterly analysis of pH, electrical conductivity, chloride, sulphate, total organic carbon (TOC) and dissolved oxygen and annual analysis of metals, volatile organic compounds (VOC), semi volatile organic compounds (SVOC) and pesticides.

There is no Emission Limit Values (ELV) or Trigger Levels set for groundwater in the Licence. For comparative purposes the results were compared to the Interim Guideline Values (IGV) published by the EPA. The IGV levels represent typical background or unpolluted conditions. However, the EPA recognises that levels higher than the IGV may occur naturally depending on the local geological and hydro-geological conditions.

Q1 2009- The groundwater quality in GW-1 and GW -2 is good and is consistent with the previous monitoring carried out between Q1 2007 and Q4 2008. The conductivity level in GW-2 (1.078 mS/cm) slightly exceeded the IGV which all parameters were below their respective IGV's

Q2 2009- The groundwater quality in GW-1 and GW -2 is good and is consistent with the previous monitoring carried out between Q1 2007 and Q1 2009. The chloride level in GW-2 (31.6 mg/l) slightly exceeded the IGV which all parameters were below their respective IGV's. The source of chloride is unknown but it is not associated with site activities

Q3 2009- Of the quarterly parameters the chloride level in GW-2 exceeded the IGV while all the parameters were below their respective IGV's. The chloride levels are similar to those levels measure at this monitoring well previously.

Of the annual parameters, only barium marginally exceeded the IGV and this occurred in both up and down gradient monitoring wells. The barium levels are similar to those levels measured in May 2008.

Q4 2009 - Of the quarterly parameters the chloride level in GW-2 marginally exceeded the IGV while all the parameters were below their respective IGV's. The chloride levels and conductivity levels are similar to those levels measure at this monitoring well previously.

Noise Survey

The last noise survey was carried on the 23rd August 2008. A noise survey was due to be undertaken in August 2009. However, the WEEE plant was fully decommissioned in May 2009.

Dust Monitoring

Dust monitoring was carried out on three occasions at four on-site locations (DS-01, DS-02, DS-03 and DS-04), as shown on Drawing 569-42-G006, in June, July and August 2009. The dusts for all 4 monitoring locations were below the dust deposition limit (350 mg/m²/day) set in the Licence at any of the monitoring locations in 2009. The results of the monitoring are included in **Appendix 5**.

Air Emission Monitoring

Air emission monitoring as detailed in schedule D 7 of the licence was not completed as the air emission point TFA1 was decommissioned as part of the overall site decommissioning in May 2009.

5. Objectives & Targets of EMS

Due to the loss business from one of the WEEE compliance schemes a decision was taken to cease WEEE processing at the facility by Q2 2009. The objective for 2009 was an orderly wind-down of all operations, all waste and products to be removed from the site and the WEEE processing plant to be decommissioned. This was achieved in May 2009 as all activities were ceased and the WEEE plant fully decommissioned.

See **Appendix 6** for a review of the 2008 objectives.

6. Procedures

A request was submitted to the Agency in 2009 requesting a transfer of the licence to Rilta Environmental Ltd. **Appendix 7** contains 2 new procedures from Rilta Environmental Ltd.

- Management of PCB Holdings
- Management of Waste Transformers

7. Reported Incidents and Complaints Summaries

During the reporting period no incidents arose or were reported. During the reporting period no complaints were received.

8. Review of Nuisance Controls

Routine, documented site inspections are performed to monitor for vectors and litter.

9. Resource and Energy Consumption Summary

Electricity

Summary	Year to date	Same Period Last Year	% Variation	Total Last Year (Jan-Dec)
Total Consumption (kWh)	119400	253700	47.1	253700
Daytime load %	69.9	61.6	13.5	61.6
Night time load %	30.1	28.7	4.9	28.7

10. Development and Infrastructural Works

No Specified Engineering Works have been carried out during 2009

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

- Cedar Resource Management Limited submitted an Environmental Liabilities Risk Assessment in January 2005.
- A proposal outlining the Financial Provision was submitted in February 2005 by Cedar Resource Management Ltd.
- A proposal for the Decommissioning and Aftercare Plan was submitted to the Agency in May 2005.

- A review of ELRA Guidance has given a Risk Category of 3 based on 2007 activities.

Staffing Structure

- Gabriel Kelly Facility Manager
- Eugene O'Brien Warehouse Supervisor
- Siobhan Boucher Transport & Quality Manager
-

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.

12. Foul Water

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

13. Any other items specified by the Agency

Not applicable.

Appendix 1 – Environmental Policy

Environmental Policy

Cedar 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. Cedar 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 Cedar. Cedar 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 Cedar'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: _____

Brendan Keane
Managing Director

Date: 13/2/08

Signed: _____

Tom Lyons
Operations Director

Date: 13/2/08

Appendix 2 – Waste Received

EWC Code	Description	Qty Received
200136	Cables	1469
200135*	CRT/Monitors	147774
200123*	Fridges	490076
200136	I.T Equipment	314618.4
200136	L.D.A	552665
160601*	Lead Acid Battery	65
160213*	Transformers	86.46
200136	Mixed WEEE	517126
Grand Total		2023879.9

Appendix 3 – AER / PRTR Emissions Data



Environmental Protection Agency

AER Returns Worksheet

Version 1.1.10

REFERENCE YEAR	2009
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1. FACILITY IDENTIFICATION

Parent Company Name	Rilta Environmental Limited
Facility Name	Rilta Environmental Limited
PRTR Identification Number	W0185
Licence Number	W0185-01

Waste or IPPC Classes of Activity

No.	class name
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.
3.11	Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.
3.12	Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.
3.13	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.
3.7	#####
4.11	Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule.
4.12	Exchange of waste for submission to any activity referred to in a preceding paragraph of this Schedule.
4.2	Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).
4.3	Recycling or reclamation of metals and metal compounds.
4.4	Recycling or reclamation of other inorganic materials.
Address 1	Parkview House
Address 2	Beech Hill
Address 3	Clonskeagh
Address 4	Co. Dublin
Country	Ireland
Coordinates of Location	-6.47708 53.2999
River Basin District	IEEA
NACE Code	3832
Main Economic Activity	Recovery of sorted materials
AER Returns Contact Name	Colm Hussey (W0185)
AER Returns Contact Email Address	colm.hussey@rilta.ie
AER Returns Contact Position	Facility Manager
AER Returns Contact Telephone Number	01 4010250
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
5(c)	Installations for the disposal of non-hazardous waste
50.1	General

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

Is it applicable?	No
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?	

4.1. RELEASES TO AIR
SECTION A: SECTOR SPECIFIC PRRR POLLUTANTS

POLLUTANT		METHOD		QUANTITY	
Name	Method Used	A (Accidental) KG/Year	F (Fugitive) KG/Year	T (Total) KG/Year	Emission Point 1
		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 PRRR POLLUTANTS

POLLUTANT		METHOD		QUANTITY	
Name	Method Used	A (Accidental) KG/Year	F (Fugitive) KG/Year	T (Total) KG/Year	Emission Point 1
		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)

POLLUTANT		METHOD		QUANTITY	
Name	Method Used	A (Accidental) KG/Year	F (Fugitive) KG/Year	T (Total) KG/Year	Emission Point 1
		0.0	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 data for the emissions of methane from landfills. Operators should only report their net methane (CH4) emission to the environment under 'Total' KG/yr for Section A; Sector specific PRRR pollutants above. Please complete the data below.

Landfill:	Total estimated methane generation (as per also in A)		Methane flared	Methane utilised in engines	Net methane emission (as reported in Section A, above)
	kg/yr	kg/yr			
Rila Environmental Limited	0.0	0.0	0.0	0.0	0.0
	0.0	0.0	0.0	0.0	0.0
	0.0	0.0	0.0	0.0	0.0

Method Used	Facility Total Capacity	
	m3 per hour	Total Flaring Capacity
	N/A	0.0
	N/A	0.0
	N/A	0.0

4.2 RELEASES TO WATERS

[PRTR# : W0185 | Facility Name : Rita Environmental Limited | Filename : W0185_2006(1).xls | Return Year : 2006]

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SECTION A : SECTOR SPECIFIC PRTR POLLUTANTS

RELEASES TO WATERS

Data on ambient monitoring of atmosphere water or groundwater, conducted as part of your licence requirements, should NOT be submitted under AER / PRTR Reporting as this only concerns Releases from your facility

No. Annex I	Pollutant Name	M/C/E	Method Code	Method Used Description or Description	Emission Point 1	QUANTITY		
						I (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

No. Annex I	Pollutant Name	M/C/E	Method Code	Method Used Description or Description	Emission Point 1	QUANTITY		
						I (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 No.	Pollutant Name	M/C/E	Method Code	Method Used Description or Description	Emission Point 1	QUANTITY		
						I (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

4.3 RELEASES TO WASTEWATER OR SEWER

SECTION A : PRTR POLLUTANTS

PRTR# : W0185 | Facility Name : Rilia Environmental Limited | Filename : W0185_2008(1).xls | Re

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

No. At Site	POLLUTANT Name	M/C/E	Method Code	Method Used	Designation or Description	Emission Point 1	QUANTITY		
							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 POLLUTANT EMISSIONS (as required in your Licence)

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

Pollutant No.	POLLUTANT Name	M/C/E	Method Code	Method Used	Designation or Description	Emission Point 1	QUANTITY		
							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

4.4 RELEASES TO LAND

[PRTR# : W0165 | Facility Name : Rilla Environmental Limited | Filenames : W0165_2009(1).xls | Return Year : 2009]

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SECTION A : PRTR POLLUTANTS

RELEASES TO LAND					
POLLUTANT	METHOD	METHOD	EMISSION POINT	TOTAL	QUANTITY
No. Annex I	Name	M/C/E	Designation or Description	T (Total) KG/Year	A (Accidental) KG/Year
				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	METHOD	EMISSION POINT	TOTAL	QUANTITY
Pollutant No.	Name	M/C/E	Designation or Description	T (Total) KG/Year	A (Accidental) KG/Year
				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#: W0185 | Facility Name: Rilia Environmental Limited | Filenames: W0185_2009(1).xls | Return Year: 2009 |

Transfer Destination	European Waste Code	Hazardous	Quantity (Tonnes per Year)	Description of Waste	Waste Treatment Operation	Method Used		Location of Treatment	Has Waste Name and Licence/Permit No of Next Destination Facility, Non-Haz Waste Address of Receiver/Disposer	Has Waste Name and Licence/Permit No of Next Destination Facility, Non-Haz Waste Address of Receiver/Disposer	Name and Licence/Permit No. and Address of Final Receiver/Disposer (HAZARDOUS WASTE ONLY)	Actual Address of Final Destination (i.e. Final Recovery/Disposal Site) (HAZARDOUS WASTE ONLY)
						M/C/E	Method Used					
Within the Country	15 01 10	Yes	0.64	Packaging containing residues of or contaminated by dangerous substances	D10	M	Weighted	Offsite in Ireland	Rilia Environmental Ltd, W0192-01	Greenogue Business Park, Rathcoole, Co. Dublin, Ireland	ATM, 821780, Viasweg 12, Moerdijk, 4762 PW, Netherlands	ATM, Viasweg 12, Moerdijk, 4762 PW, Netherlands
Within the Country	15 02 02	Yes	0.235	Absorbents, filter materials (including oil filters not otherwise specified) wiping cloths, protective clothing contaminated by dangerous substances	D10	M	Weighted	Offsite in Ireland	Rilia Environmental Ltd, W0192-01	Greenogue Business Park, Rathcoole, Co. Dublin, Ireland	ATM, 821780, Viasweg 12, Moerdijk, 4762 PW, Netherlands	ATM, Viasweg 12, Moerdijk, 4762 PW, Netherlands
Within the Country	13 02 06	Yes	1.04	Other engine, gear and lubrication oils	R9	M	Weighted	Offsite in Ireland	Enva Ireland, W0184-01	Enna Industrial Estate, Portlaoise, Ireland	Enna Ireland Ltd, W0184-01, Clonminham Industrial Estate, Portlaoise, Co. Laoise, Ireland	Clonminham Industrial Estate, Portlaoise, Co. Laoise, Ireland
To Other Countries	20 01 23	Yes	488.71	Discarded equipment containing chlorofluorocarbons	R4	M	Weighted	Abroad	EMR-EAWML4009	Enna Industrial Estate, West Midlands, WS108LW, United Kingdom	Enna Ireland Ltd, W0184-01, Clonminham Industrial Estate, Portlaoise, Co. Laoise, Ireland	Clonminham Industrial Estate, Portlaoise, Co. Laoise, Ireland
Within the Country	20 01 23	Yes	29.42	Discarded equipment containing chlorofluorocarbons	R13	M	Weighted	Offsite in Ireland	Techrec Ireland, W0233-01	51 Parkwest Business Park, Mangor, Road, Dublin 12, Ireland	Techrec (NI) Ltd, 110 Treweek Road, Killyman, Dungannon, BT71 4BY, United Kingdom	Techrec (NI) Ltd, 110 Treweek Road, Killyman, Dungannon, United Kingdom
To Other Countries	20 01 23	Yes	7.28	Discarded equipment containing chlorofluorocarbons	R4	M	Weighted	Abroad	Winconton Group, EAWML309953	Macklin Avenue, Cowpen Lane, Ind. Est., Billingham, Cleveland TS23 4BY, United Kingdom	Winconton Group, EAWML309953, Macklin Avenue, Cowpen Lane, Ind. Est., Billingham, Cleveland TS23 4BY, United Kingdom	Winconton Group, Macklin Avenue, Billingham, Cleveland TS23 4BY, United Kingdom
Within the Country	20 01 33	Yes	2.726	Batteries and accumulators including in 16 06 01, 10 06 02 or 16 06 03 and unsorted batteries and accumulators	R13	M	Weighted	Offsite in Ireland	Reudmbaatt Ltd, 97 2002A	Reudmbaatt Ltd, 97 2002A, Oldmill Industrial Estate, Oldmilltown, Naas, Co. Kildare, Ireland	Reudmbaatt Ltd, 97 2002A, Oldmill Industrial Estate, Oldmilltown, Naas, Co. Kildare, Ireland	Oldmill Industrial Estate, Oldmilltown, Naas, Co. Kildare, Ireland
To Other Countries	20 01 36	Yes	122.418	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23, containing hazardous components	R4	M	Weighted	Abroad	Global Recycling Co., EAWML 50120/M02	Unit D Maritime Business Park, Cambellown Road, Birkenhead, Wirral, CH41 5HP, United Kingdom	Global Recycling Company, EAWML 50120/M02, Unit D Maritime Business Park, Cambellown Road, Birkenhead, Wirral, CH41 5HP, United Kingdom	Unit D Maritime Business Park, Cambellown Road, Birkenhead, Wirral, CH41 5HP, United Kingdom
Within the Country	20 01 35	Yes	46.96	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23, containing hazardous components	R4	M	Weighted	Offsite in Ireland	The Recycling Village, WP2004/75	Unit 4a Tenure Business Park, Monasterboice, Drogheda, Co. Louth, Ireland	The Recycling Village, WP2004/15, Unit 4a Tenure Business Park, Monasterboice, Drogheda, Co. Louth, Ireland	Unit 4a Tenure Business Park, Monasterboice, Drogheda, Co. Louth, Ireland
Within the Country	15 01 01	No	3.34	Paper and cardboard packaging	R13	M	Weighted	Offsite in Ireland	Greenstar, W-0183-01	Greenstar, W-0183-01, AT Metal Recycling, ATF, WMP0076	Greenstar, W-0183-01, AT Metal Recycling, ATF, WMP0076	Greenstar, W-0183-01, AT Metal Recycling, ATF, WMP0076
Within the Country	16 02 14	No	62.28	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13	R4	M	Weighted	Offsite in Ireland	The Remet Company, London, 80115	The Remet Company, London, 80115	The Remet Company, London, 80115	The Remet Company, London, 80115
To Other Countries	16 02 16	No	77.769	Components removed from discarded equipment other than those mentioned in 16 02 15	R4	M	Weighted	Abroad	S Norton & Co. Ltd, WML 19602/M01	S Norton & Co. Ltd, WML 19602/M01	S Norton & Co. Ltd, WML 19602/M01	Bankfield House, Bankfield Mill, Regent Road, L20 8RQ, Liverpool, United Kingdom

Transfer Destination	European Waste Code	Hazardous	Quantity (Tonnes per Year)	Description of Waste	Waste Treatment Operation	Method Used		Location of Treatment	Haz Waste Name and Licence/Permit No of Next Destination Facility Lic Waste Name and Licence/Permit No of Receiver/Disposer	Name and Licence / Permit No. and Address of Final Receiver / Disposer (HAZARDOUS WASTE ONLY)	Actual Address of Final Destination (ie. Final Receiver/ Disposal Site) (HAZARDOUS WASTE ONLY)
						W/C/E	Method Used				
Within the Country	19 10 01	No	24.6	Iron and Steel Waste	R4	M	Weighted	Offsite in Ireland	A1 Metal Recycling ATF WWP007G s.,ireland Acger,Mountmellick,Co.Laoi	Acger,Mountmellick,Co.Laoi	
Within the Country	19 10 02	No	2.6	Non Ferrous Waste	R4	M	Weighted	Offsite in Ireland	A1 Metal Recycling ATF WWP407G s.,ireland Acger,Mountmellick,Co.Laoi	Acger,Mountmellick,Co.Laoi	
Within the Country	19 10 02	No	5.09	Non Ferrous Waste	R4	M	Weighted	Onsite in Ireland	A1 Metal Recycling ATF WWP007G s.,ireland 51 Parkwest Business Park Nangor, Road, Dublin 12	Acger,Mountmellick,Co.Laoi	
Within the Country	19 12 04	No	7.116	Plastic and rubber	R3	M	Weighted	Offsite in Ireland	Techrec Ireland, W0233-01 51 Parkwest Business Park Nangor, Road, Dublin 12	Acger,Mountmellick,Co.Laoi	
Within the Country	20 01 36	No	266.468	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	R4	M	Weighted	Offsite in Ireland	Techrec Ireland, W0233-01 51 Parkwest Business Park Nangor, Road, Dublin 12	Acger,Mountmellick,Co.Laoi	
To Other Countries	20 01 36	No	607.377	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	R4	M	Weighted	Abroad	S Norton & Co. Ltd, W/VL 19502/M01 Liverpool, United Kingdom	Bankfield House, Bankfield Mill, Regent Road, L20 8RQ Liverpool, United Kingdom	
Within the Country	20 03 01	No	38.92	Mixed Municipal Waste	D1	M	Weighted	Offsite in Ireland	Thomsons Recycling, W0183-01 10, s.,ireland Millennium Business Park, Ballycolin, Dublin 11, ireland	Acger,Mountmellick,Co.Laoi	
Within the Country	20 03 01	No	27.38	Mixed Municipal Waste	D1	M	Weighted	Offsite in Ireland	Greenstar, WJ-0183-01 11, ireland	Acger,Mountmellick,Co.Laoi	

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

Appendix 4 – Monitoring Locations

Appendix 5 – Monitoring Results

Results for 2009 for Surface Water Location SW-1

		Q1 2009	Q2 2009	Q3 2009	Q4 2009
pH	pH Units	8.15	8.35	*	*
Conductivity	mS/cm	0.332	0.352	*	*
Temperature	°C	8	17.1	*	*
COD	mg/l	42	8	*	*

* Monitoring location was dry and therefore it was not possible to take a sample

Dust Results 2009

	June 2009	July 2009	August 2009
D1	197	77	44.41
D2	174	57	67.99
D3	216	70	83.35
D4	192	144	*

* Sample contaminated by bird excrement and could not be analysed

Results for 2009 for Groundwater Location GW-1

Parameter	Units	Q1 2009	Q2 2009	Q3 2009	Q4 2009
pH	pH units	8.1	8.03	8.11	7.57
Conductivity	mS/cm	0.779	0.711	0.745	0.748
Chloride	mg/l	21.2	21.3	14.9	22.7
Sulphate	mg/l	111.28	121.92	93.38	103.79
Dissolved Oxygen	mg/l	<3	<2	10	5
Total Organic Carbon	mg/l	9	5	7	72
Aluminium	mg/l	N/A	N/A	0.183	N/A
Barium	mg/l	N/A	N/A	0.116	N/A
Beryllium	mg/l	N/A	N/A	<0.0005	N/A
Boron	mg/l	N/A	N/A	<0.012	N/A
Cadmium	mg/l	N/A	N/A	<0.005	N/A
Chromium	mg/l	N/A	N/A	<0.0015	N/A
Cobalt	mg/l	N/A	N/A	<0.002	N/A
Copper	mg/l	N/A	N/A	<0.007	N/A
Iron	mg/l	N/A	N/A	<0.02	N/A
Lead	mg/l	N/A	N/A	<0.005	N/A
Mercury	mg/l	N/A	N/A	<0.001	N/A
Nickel	mg/l	N/A	N/A	0.003	N/A
Silver	mg/l	N/A	N/A	<0.001	N/A
Tin	mg/l	N/A	N/A	<0.005	N/A
Zinc	mg/l	N/A	N/A	<0.003	N/A
Selenium	mg/l	N/A	N/A	0.003	N/A
Arsenic	mg/l	N/A	N/A	<0.0025	N/A
Antimony	µg/l	N/A	N/A	<0.002	N/A
VOC	µg/l	N/A	N/A	<5	N/A
SVOC	µg/l	N/A	N/A	<10	N/A
Pesticides	ng/l	N/A	N/A	<0.01	N/A

N/A - Not Applicable

Results for 2009 for Groundwater Location GW-2

Parameter	Units	Q1 2009	Q2 2009	Q3 2009	Q4 2009
pH	pH units	7.88	8.05	8	7.3
Conductivity	mS/cm	1.078	0.916	0.911	1.063
Chloride	mg/l	29.8	31.6	37	32.5
Sulphate	mg/l	169.51	126.94	105.18	184.78
Dissolved Oxygen	mg/l	<3	5	9	6
Total Organic Carbon	mg/l	9	5	9	89
Aluminium	mg/l	N/A	N/A	0.231	N/A
Barium	mg/l	N/A	N/A	0.106	N/A
Beryllium	mg/l	N/A	N/A	0.0005	N/A
Boron	mg/l	N/A	N/A	<0.012	N/A
Cadmium	mg/l	N/A	N/A	<0.005	N/A
Chromium	mg/l	N/A	N/A	<0.0015	N/A
Cobalt	mg/l	N/A	N/A	<0.002	N/A
Copper	mg/l	N/A	N/A	<0.007	N/A
Iron	mg/l	N/A	N/A	<0.02	N/A
Lead	mg/l	N/A	N/A	<0.005	N/A
Mercury	mg/l	N/A	N/A	<0.001	N/A
Nickel	mg/l	N/A	N/A	0.006	N/A
Silver	mg/l	N/A	N/A	<0.001	N/A
Tin	mg/l	N/A	N/A	<0.005	N/A
Zinc	mg/l	N/A	N/A	0.005	N/A
Selenium	mg/l	N/A	N/A	<0.003	N/A
Arsenic	mg/l	N/A	N/A	0.0027	N/A
Antimony	µg/l	N/A	N/A	<0.002	N/A
VOC	µg/l	N/A	N/A	<30*	N/A
SVOC	µg/l	N/A	N/A	<10	N/A
Pesticides	ng/l	N/A	N/A	<0.01	N/A

N/A - Not Applicable

* Sample was diluted by a factor 6 hence it has a higher limit of detection

Appendix 6 – Objectives and Target Review 2008

Cedar Resource Management Ltd Management Programme 2008

1	Objective	Logistic Tender	Resp.	Target Date	Date Completed	Comments
	Target	To establish a tendering system for logistics	SB/TL	Q3 2008	Jul-08	
	Progress:	Retained business from ERP, did not secure any business from WEEE Ireland				
	Completed:	Jul-08				

2	Objective	Restructuring of the Management system and Documentation	Resp.	Target Date	Date Completed	Comments
	Target	Review the Following Main Items for review:	GK/SB	Apr-08		
		Structure of the system	GK			
		Policy Manual	GK/SB			
		Review of Management Programme and Objectives and Targets	BK/TL/GK/SB			
		Organisational Structure	GK/SB			
		Responsibilities within the management system	BK/TL			
		Reorganistaion and revision of procedural system	GK/SB			
		Management system Training	GK/SB			
	Progress:	Full review of ISO manual / procedures updated to take into account, changes in personnel and business				
Completed:	Jun-08					

3	Objective	Operational Control	Resp.	Target Date	Date Completed	Comments
	Target	Formalise the following Items in the Management system				
		Production Meeting	GK	Jan-08	Jan-08	Day to Day logistics, Production and HR
		Production Report	GK	Jan-08	Jan-08	Weekly production throughput
		Truck Report	SB	Jan-08	Jan-08	Day monitoring of truck activity
	Progress:	Better visibility of production, capacity. Planning greatly improved. Efficiency of collections improved as greater emphasis now on				
Completed:	Jan-08					

4	Objective	Safety Committee	Resp.	Target Date	Date Completed	Comments
	Target	Establish safety committee with safety reps	CD/EOB	Q1 2008	Apr-08	Health & Safety manager main responsibility
	Progress:	Safety Meeting held. Reviewed accidents, near misses, identified training needs. VDU Assessment to be done				
	Completed:	Feb-08				

5	Objective	SDA Trial and design	Resp.	Target Date	Date Completed	Comments
	Target	SDA Plant Trial: To establish current opeational ability	GK	Mar-08	Apr-08	
		SDA Design considerations: Capex , equipment identification etc.	GK/BK/TL	Jun-08		
	Progress:	Review of plant throughput and required volumes to break even				
Completed:	Apr-08					

Appendix 7 – Procedures

RILTA Environmental Ltd.			
EMS PROCEDURE MANUAL			
TITLE	Management of PCB Holdings	REF	
ISSUED BY	Colin Lennon	APPROVED BY	
DATE	29/06/2010	PAGE	1 of 6

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Revision	Description	By	Approved	Date
000		C. Lennon		29/06/2010
001		C. Lennon		09/07/2010

1.0 Purpose

To document the procedures for the inspection, testing, on-site draining, packaging, transport and disposal of obsolete/waste known and suspect PCB (Polychlorinated Biphenyls) holdings.

2.0 Scope

The procedures outlined in this document conform to ADR and to guidelines laid out in the Management Plan for Polychlorinated Biphenyls (PCBs) in Ireland published by the EPA in August 2008 (appendix 03).

3.0 Responsibility

Operations Director & Environmental Manager

4.0 Procedures

4.1 Inspection of PCB Holdings:

Each site with known or suspect PCB holdings must be inspected and the nature of each holding assessed prior to any works commencing on site.

Prior assessment of the holdings allows for the scope of works to be established including equipment and tools required, type of spill kit and the nature of the packaging required.

Equipment manufactured during or prior to 1989 will be assumed to contain PCBs. Equipment with no identifiable date of manufacture will also be assumed to contain PCBs.

Photographs of each piece of equipment should be taken including where possible photos of the ID plate on the equipment and oil drain/access ports

Where possible the following information should be gathered for each known or suspect holding.

- Type of equipment e.g. lighting ballast, transformer, circuit breaker etc
- Manufacturer
- Serial number
- Dimensions
- Year of Manufacture
- Volume of oil contained in the unit
- Presence of oil-drain / access ports
- Fittings required to attached to oil drain / access ports

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A log sheet has been prepared to capture this information see appendix 01

4.2 Testing of PCB Holdings:

Samples of oil should be obtained only where safe and possible and where sampling does not increase the risk of a release of potentially PCB contaminated oil to the environment.

Oil samples should only be obtained in a manner that will not give rise to aerosols.

Samples of transformer oil will be obtained adhering to the sampling protocol laid down in ASTM Standard D-923 (see appendix 4).

Sampling should be carried out using a manual pipette pump and single use 50ml pipettes, samples should be placed into single use 50ml centrifuge tubes. Under no circumstances is mouth pipetting to be considered.

Samplers should wear the following PPE when taking samples of oil from suspect or known PCB holdings

- Nitrile or butyl rubber gloves – do not use Latex gloves
- Eye protection
- Coveralls impervious to PCBs such as Tychem F
- Respiratory protective devices with a full face mask fitted with a class P3 cartridge/canister suitable for use with PCBs is required when handling PCB liquids at temperatures >55°C, where there is a significant amount of PCB liquid exposed to the air, or where adequate ventilation is not possible.

Samples of oil must only be tested using a methodology which conforms to the testing guidelines detailed in section 4.2 of the EPA Management Plan for PCBs. Oils sampled from transformers will be analysed as per ASTM Standard D-4059 (see appendix 4).

The results of PCB testing will determine the course of action to be taken in the management of PCB holdings.

Any equipment containing oil with a PCB concentration of >50ppm (0.005%) is classed as a PCB holding and will be managed in accordance with the EPA Management Plan for PCBs and ADR.

Any equipment containing oil with a PCB concentration of <50ppm (0.005%) is not classed as a PCB holding and will be managed accordingly.

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4.3 Draining of PCB Holdings

Standard equipment to carry out removal of PCB containing oil from a known PCB holding is as follows:

- 1000 guage polythene,
- Barrier Tape
- Traffic Cones
- Spill Kit (based on original site assessment)
- Class B Fire extinguisher
- Drain sealing pads / putty
- PPE
- Pump including adequate hosing
- Drill including hole cutting drill bits
- Power supply for pump and drilling equipment or 110V transformer
- 1A1/X Rated Steel Tighthead drums
- 1A2/X Rated Steel Open-top drums
- Pallets and shrink wrap

Unsealed PCB holdings such as electrical transformer equipment will be drained of PCB containing oils prior to removal from site as transport of unsealed oil-filled equipment may result in a release of PCB containing oils into the environment during transport.

The following PPE should be worn during all PCB handling operations:

- Nitrile or butyl rubber gloves – do not use Latex gloves
- Eye protection
- Coveralls impervious to PCBs such as Tychem F
- Respiratory protective devices with a full face mask fitted with a class P3 cartridge/canister suitable for use with PCBs is required when handling PCB liquids at temperatures >55°C, where there is a significant amount of PCB liquid exposed to the air, or where adequate ventilation is not possible.

Heavy duty 250mu (1000 guage) polythene will be laid over the work area, weight down the polythene using traffic cones and cordon off the area using barrier tape.

The barrier tape and cones will clearly identify the work area and control access to this area.

Surface water drains and manhole covers adjacent to the work area must be bunded or sealed prior to work commencing to ensure that if a spill occurs oil cannot enter the site drainage infrastructure.

Based on the previous site assessment there will be sufficient 1A1/X steel tight-head drums brought to site to accommodate the oil collected from the PCB holding.

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1no. 1A2/X open-top drum will be brought to site to accommodate soiled PPE and other PCB oil contaminated waste.

Based on the original site assessment there will be adequate spill response equipment including hydrophobic oil specific absorbent pads and booms plus oil-dry granules.

Oil will be drained from each PCB holding in a manner which will eliminate as much as possible the risk of there being a release of PCB containing oil. If there is a header tank present oil will be drained from the header tank first using the oil drain port where possible.

If the oil drain ports are not suitable, damaged or inaccessible create access ports in the top of the PCB holding using an appropriate hole-cutting drill-bit. Drain the oil from the holding by feeding the hosing through the opening created in the top of the holding.

Oil will be pumped from the equipment using a designated pump. This pump will only be used to pump PCB containing oils.

Before filling the drums should be placed on option a or b as follows:

- a. Pallets to enable easier handling of the drums using a pallet truck or similar equipment. Pallets are only to be used if the drums and pallets are to be placed on the leak-proof metal tray with the drained equipment
- b. Metal spill tray which can be moved using a pallet truck

The oil will be pumped into steel 1A1/X drums

Drums are to be filled to 75% of capacity.

The drums must be labelled using the recommended PCB warning label and a UN Class 9 label under UN number 2315 and proper shipping name (PSN) POLYCHLORINATED BIPHENYLS, LIQUID Packing Group II (see appendix 02). Once filled and labelled the drums are to be shrink wrapped on the pallet or spill tray.

When the oil has been completely drained from the transformer a bung will be placed into any drilled openings and any taps will be closed off to ensure no leakage of residual oil.

The drained equipment will be labelled as detailed above (see appendix 02).

Drained equipment and if required palletised drums of PCB oil will be placed on a leak-proof metal tray constructed to transport the unit. It must be possible to move this tray using a pallet truck or fork lift and the tray must be accommodate in addition to the drained holdings and drums of oil (if required) at least 1.25 times the volume of PCB liquids present, the tray must also be packed with sufficient inert absorbent material to absorb 1.1 times the volume of PCB liquids present in the holdings.

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4.4 Transport and storage of PCB containing waste:

If the equipment is sealed equipment such as circuit breakers and is not to be drained the PCB holding is to be placed in a suitable UN approved container that conforms to ADR such as the 1A2/X steel open-top drums. If the holding will not fit into a drum a leak-proof metal tray will be constructed to transport the unit. This tray must accommodate in addition to the holdings at least 1.25 times the volume of PCB liquids present in the holdings, the tray must also be packed with sufficient inert absorbent material to absorb 1.1 times the volume of PCB liquids present in the holdings.

Drained equipment, drums containing PCB oil and sealed holdings packed as described above will be transported under C1 hazardous waste consignment note and delivered by appropriately licensed and permitted carrier to the Rilta Environmental facility at:

Cedar House,
Grants Road,
Greenogue Business Park,
Rathcoole,
Co. Dublin

The above facility operates under EPA waste licence no. W0185-01.
PCB Oil and drained equipment will be stored in a bunded area.
Access / Egress doors to this area will be labelled to identify that PCB containing material is stored within the building.

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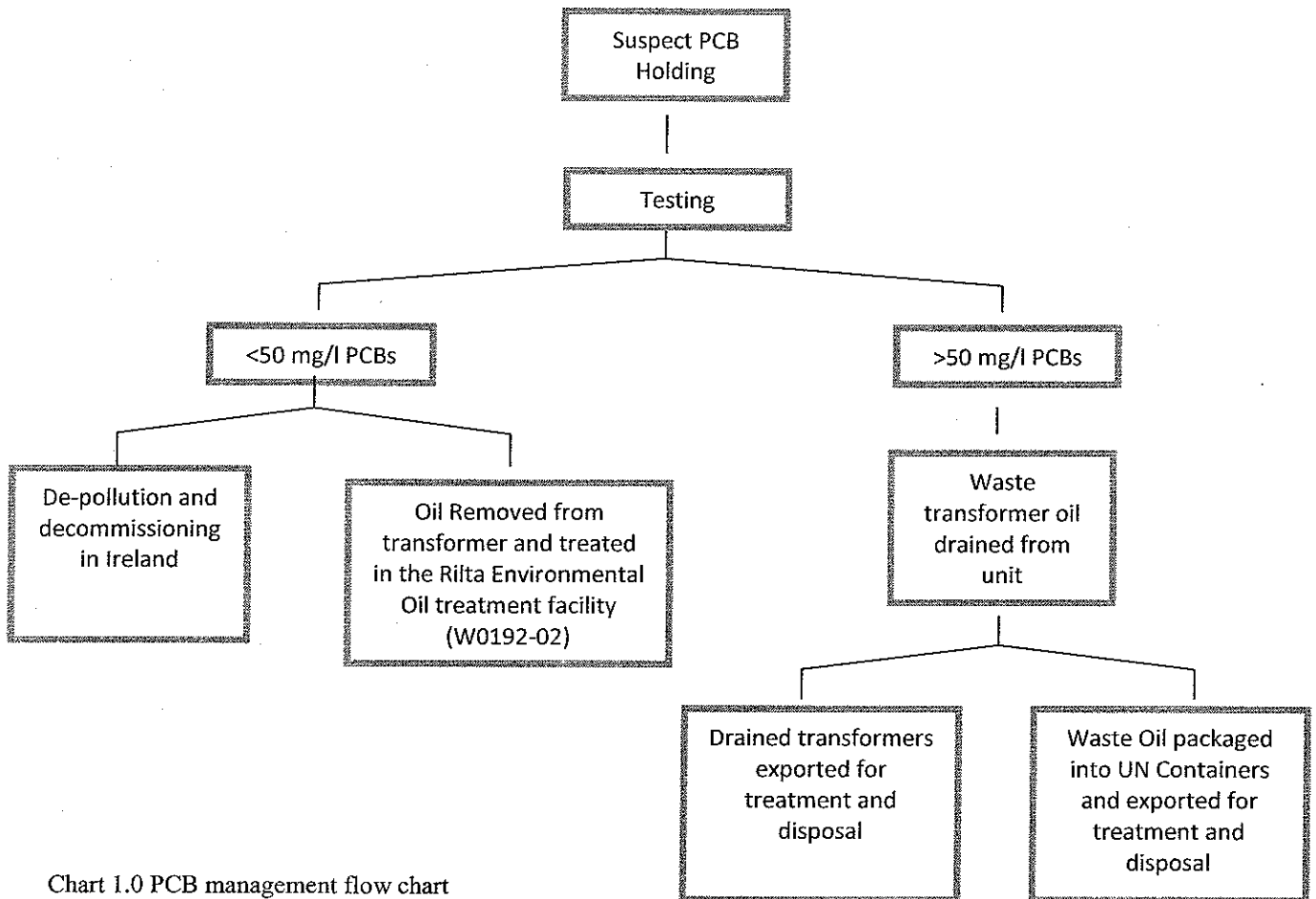


Chart 1.0 PCB management flow chart

4.5 Disposal:

Drums of PCB containing oil, drained PCB holdings and full sealed holdings will be exported for treatment and disposal under TFS to appropriately licensed facilities in continental Europe.

Emergency Procedures will be put in place to deal with the following

- First Aid treatment following exposure to PCB containing oils
- Fire involving PCB containing oils
- Leak / Spill of PCB containing oils on site and during transit

RILTA Environmental Ltd.			
EMS PROCEDURE MANUAL			
TITLE	Management of Waste Transformers	REF	
ISSUED BY	Colin Lennon	APPROVED BY	
DATE	10/08/2009	PAGE	1 of 4

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Revision	Description	By	Approved	Date
000		C. Lennon		10/08/2009
001	EPA required review	C. Hussey		17/08/2009

1.0 Purpose

To document the procedures for the acceptance, testing and disposal of obsolete & waste transformers including known and suspect PCB (Polychlorinated Biphenyls) holdings.

2.0 Scope

The procedure outlined in this document conforms to the guidelines laid out in the Management Plan for Polychlorinated Biphenyls (PCBs) in Ireland published by the EPA in August 2008.

3.0 Responsibility

Operations Director & Environmental Manager

4.0 Procedure

- Obsolete and waste transformers will be transported under C1 hazardous waste consignment note and delivered by appropriately licensed and permitted carriers to the Cedar Site covered by EPA waste licence no. W0185-01.
- Transformers will be offloaded and stored in the area marked on the attached drawing (see annex 1)
- Transformers manufactured during or prior to 1986 will be assumed to contain PCBs. Transformers with no identifiable date of manufacture will also be assumed to contain PCBs.
- Samples of transformer oil will be obtained adhering to the sampling protocol laid down in ASTM Standard D-923 (see annex 2).
- Oils sampled from transformers will be analysed as per ASTM Standard D-4059 (see annex 3).
- Subject to analysis results the following actions will be taken.

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PCB concentration <50 mg/l

- Transformer oil will be drained from the transformer
- The oil will be treated via the Rilta Environmental Oil treatment facility (W0192-02)
- Waste metals will be sent for recycling and recovery via the facilities listed in annex 4

PCB concentration >50 mg/l

- The transformer(s) will be safely moved to the designated storage area without removing the PCB oil content.
- Each transformer will be inspected to ensure its suitability for transport by sea. Particular attention will be paid to possible leaks and rusty/unsafe hinges and joints and overall integrity of the unit.
- If suitable for transport, the relevant TFS paperwork will be prepared and all authorities notified.
- The transformer will be transported whole in a suitably banded tray as per ADR & IMDG regulations and EPA guidelines.
- If the transformer is deemed unsuitable for transport the following procedure will apply:
- The transformer(s) will be safely moved to the designated storage area without removing the PCB oil content.
- It will be secured in place to ensure no spills take place
- Transformer oil will be drained from the transformer
- The oil will be transferred into UN approved containers and stored pending export for treatment and disposal via the facilities listed in annex 4
- The empty transformers will be packaged and labelled as per ADR and IMDG and exported for treatment and disposal via the facilities listed in annex 4

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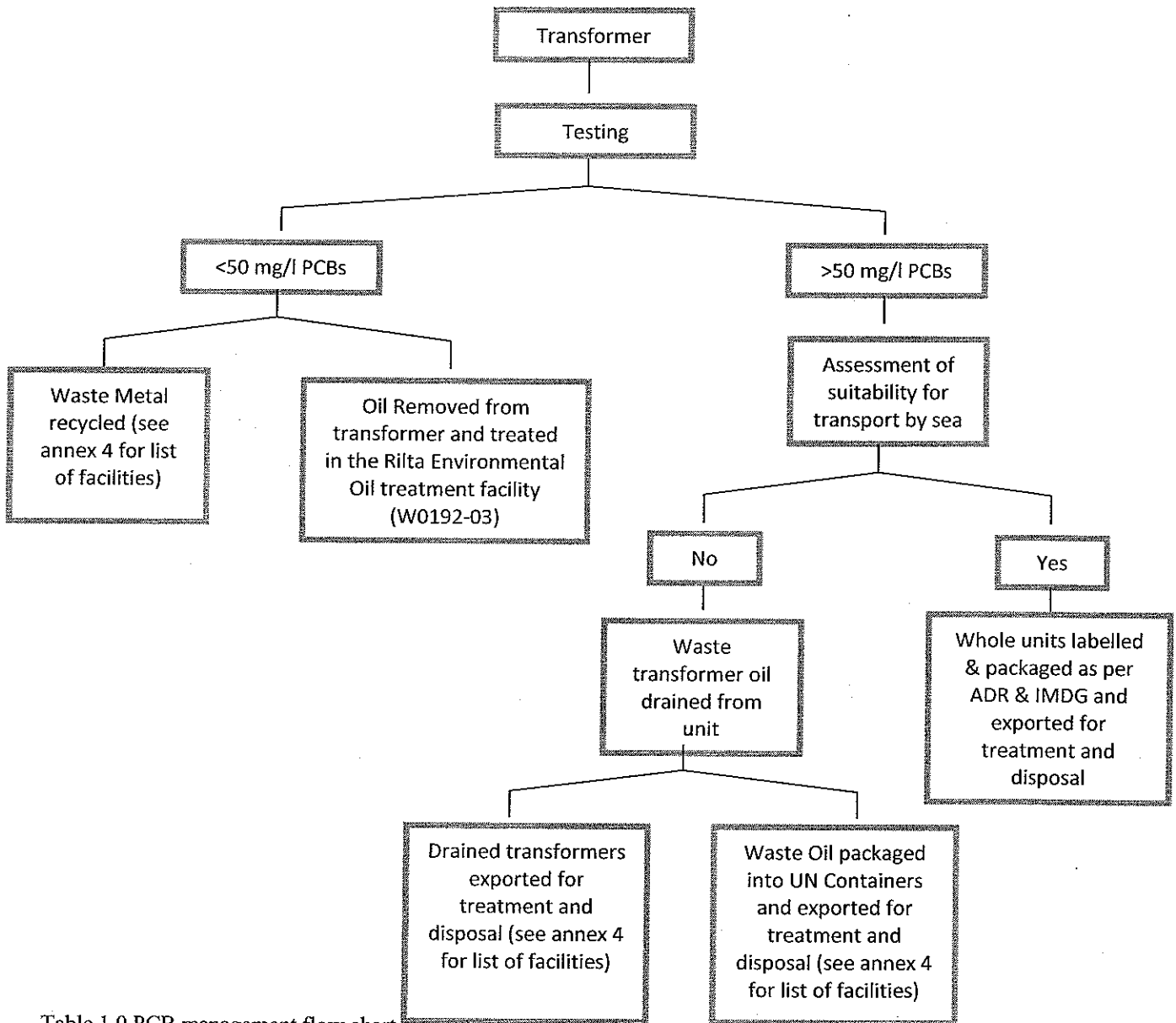


Table 1.0 PCB management flow chart

Transformers will be stored and all processing will be carried out in a remotely bunded area (see annex 1).

To avoid cross contamination of equipment two separate sets of pumping equipment and piping will be provided, one for PCB concentrations <50mg/l and the other for PCB concentrations >50mg/l.

Two separate decanting areas will be set up for the decanting of the transformer oil. Decanting will be carried out on steel fabricated drip trays with rear and side splash guards similar in design to that photographed on page 32 of the EPA management plan for PCBs.

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All processing will be carried out by appropriately trained personnel equipped with the follow PPE:

- Gloves
- Overshoes
- Overalls
- Safety Glasses

If PCB concentration is greater than 50ppm the following will also be worn:

- Chemical safety goggles or face shields
- Coveralls impervious to PCBs

Emergency Procedures will be put in place to deal with the following

- First Aid treatment following exposure to PCB containing oils
- Fire involving PCB containing oils
- Leak / Spill of PCB containing oils