Report: **Annual Environmental Report 2010**

Report No.: 233/090311

Licensed Facility: **Parkwest Facility**

Licensee: **Immark Ireland Limited.**

Number: **W0233**

Report No. 233/090311
Rev.: 01
Date: 25/02/2011
Authorised:Patrick O'Neill

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.*

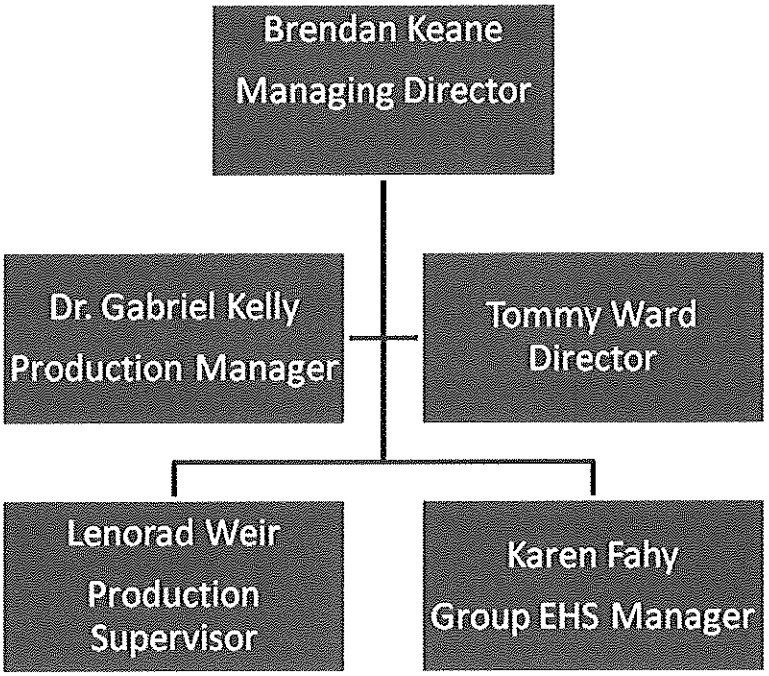
This policy statement shall be used as a framework for setting and achieving these objectives.

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 2010 to 31st December 2010.

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 Worksheet

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

Stack monitoring was not carried for the period as the plant was shut down during 2010.

Surface water monitoring was carried out during 2010 during the following dates:

Test	Lab Reference	Date
Quarterly Storm Water	1115/011/01	6th April 2010
Quarterly Storm Water	1115/015/01	5th October 2010
Quarterly Storm Water	1115/016/01	17th November 2010
Annual Storm Water	1115/017/01	12th December 2010

Please see appendix 1 for the full results of all storm water monitoring.

A nosie survey was not deemed necessary for the 2010 period as all waste handling operations had ceased from the 06/04/2010. A letter to request same was submitted to the Agency on the 20/10/10. The Agency then responded on the 6th of November to agree with the request that a noise survey was not required.

See Appendix 1 for full storm water monitoring reports.

See Appendix 2 for EPA letter re noise monitoring.

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.

3. Environmental Management Programme proposal for 2010

The Environmental Management Programmes for the facility was not extended beyond 2010 as as all waste handling operations had ceased from the 06/04/2010.

7 *Procedures*

There were no procedural changes during 2010.

Two procedures were issued during 2009.

PW-101 Waste Acceptance

PW-202 Security and Visitors

See Appendix 4 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*

During the reporting period no incidents took place and no complaints were received.

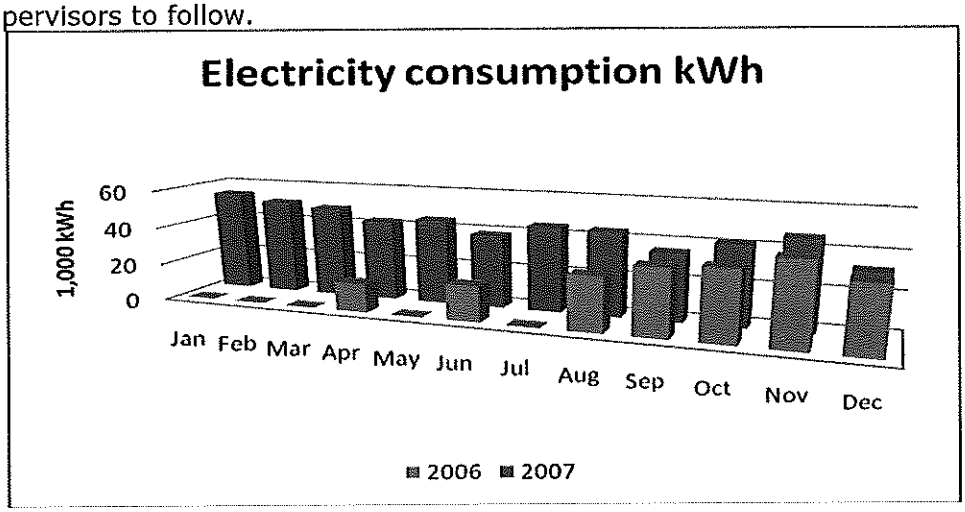
10 *Review of Nuisance Controls*

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 not operatinal during 2010. Therfore energy consumption at the site had fallen. All onsite operations ceased from the 6th of April 2010.

12 *Development and Infrastructural Works*

No Specified Engineering Works have been carried out during 2010.

In early 2010 and due to commercial reasons it was decided that this facility was no longer viable to operate. The Licensee then implemented the closure plan which

involved removing the majority of the materials and wastes and the dismantling and sale to the original suppliers of the processing equipment.

Until July 2010, the facility continued to be used as a transfer station for refrigeration units, which solely involved storage in curtain sided trailers.

On the 30-11-2010 a formal letter to surrender the licence was stamped received by the Agency. A closure audit has subsequently been carried out with the site inspection taking place on the 19th of January 2011 by O'Callaghan Moran & Associates. See appendix 5 for Licence surrender letter & OCM closure audit.

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 2010.

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 – Storm Water

FRAOCH
environmental consulting

Your ref	
Our ref	TEC001
Direct line	052 55978 / 086 3348141
Fax	052 91 55978
Email	heather.loughlin@fraoch.ie
Date	14 April 2010

Karen Fahey
Group EHS Manager
One 51 ES Metals (Ireland Ltd)
Ballysimon Road
Limerick

Dear Karen

Waste Licence WO233-01: Quarterly Storm Water Monitoring, April 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 Metals, 51 Park West Industrial Estate, Dublin 12 on 6th April 2010. 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.

Elevated mineral oil levels were present in SW1, at 146.13 ug/l and 59.67 ug/l respectively.

Yours sincerely

Heather Loughlin
Principal Consultant

Appendix 1: Certificates of Analysis (2 pages)

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Environmental Science & Management
Water,Soil & Air Testing

Unit 35,
Boyne Business Park,
Drogheda,
Co. Louth
Ireland
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.*	1115/011/01
		Date of Receipt	08/04/2010
		Date Testing Commenced	08/04/2010
		Received or Collected	Courier: Interlink
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	12/04/2010
Customer Ref	Techrec SW1 06/04/10	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
COD (Surface Water)	107	Colorimetry	36	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	146.13	ug/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	75	mg/L	

Signed : DHeslin ***Date :*** 12/04/10

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

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email info@euroenv.ie

Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/011/02
		Date of Receipt	08/04/2010
		Date Testing Commenced	08/04/2010
		Received or Collected	Courier: Interlink
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	12/04/2010
Customer Ref	Techrec SW5 06/04/10	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
COD (Surface Water)	107	Colorimetry	24	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	59.67	ug/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	22	mg/L	

Signed : DHeslin ***Date :*** 12/04/10

Donna Heslin - Laboratory Manager

Acc. : Accredited Parameters by ISO 17025:2005

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Your ref	
Our ref	TEC001
Direct line	052 55978 / 086 3348141
Fax	052 91 55978
Email	heather.loughlin@fraoch.ie
Date	01 November 2010

Patrick O'Neill
One 51

Dear Patrick

Waste Licence WO233-01: Quarterly Storm Water Monitoring, October 2010

In accordance with the requirements of Schedule C2.3 of Waste Licence WO233-01 (Techrec), quarterly storm water monitoring was carried out at Immark Metals, 51 Park West Industrial Estate, Dublin 12 on 5th October 2010. 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.

Elevated mineral oil levels were present in SW1, at 158.47 ug/l.

Yours sincerely

H.M Loughlin

Heather Loughlin
Principal Consultant

Appendix 1: Certificates of Analysis (2 pages)

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email: info@euroenv.ie

Customer	Heather Loughlin	*Lab Report Ref. No.*	1115/015/01
	Fraoch	*Date of Receipt*	07/10/2010
	Crohane	*Date Testing Commenced*	07/10/2010
	Killenaule	*Received or Collected*	Courier: An Post
	Thurles	*Condition on Receipt*	Acceptable
	Co Tipperary	*Date of Report*	15/10/2010
Customer PO		*Sample Type*	Surface Water
Customer Ref	Techrec SW 1		

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
COD (Surface Water)	107	Colorimetry	105	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	158.47	ug/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	43	mg/L	

Signed : _____ *Date :* _____

Katherine McQuillan - Technical Manager

Acc. : Accredited Parameters by ISO 17025:2005

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email: info@euroenv.ie

Customer	Heather Loughlin	*Lab Report Ref. No.*	1115/015/02
	Fraoch	*Date of Receipt*	07/10/2010
	Crohane	*Date Testing Commenced*	07/10/2010
	Killenaule	*Received or Collected*	Courier: An Post
	Thurles	*Condition on Receipt*	Acceptable
	Co Tipperary	*Date of Report*	15/10/2010
Customer PO		*Sample Type*	Surface Water
Customer Ref	Techrec SW 5		

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
COD (Surface Water)	107	Colorimetry	24	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	22.54	ug/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	17	mg/L	

Signed : _____ *Date :* _____

Katherine McQuillan - Technical Manager

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Results contained in this report relate only to the samples tested

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Your ref	
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Direct line	052 55978 / 086 3348141
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Email	heather.loughlin@fraoch.ie
Date	10 December 2010

Patrick O'Neill
One51 Group PLC
151 Thomas Street
Dublin 8

Dear Patrick

Waste Licence WO233-01: Quarterly Storm Water Monitoring, November 2010

In accordance with the requirements of Schedule C2.3 of Waste Licence WO233-01 (Techrec), quarterly storm water monitoring was carried out at Immark Metals, 51 Park West Industrial Estate, Dublin 12 on 17th November 2010. 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.

All analysis results were within acceptable levels.

Yours sincerely

H.M Loughlin

Heather Loughlin
Principal Consultant

Appendix 1: Certificates of Analysis (2 pages)

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email info@euroenv.ie

Customer	Heather Loughlin Fraoch Crohane Kilfenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/016/01
		Date of Receipt	19/11/2010
		Date Testing Commenced	19/11/2010
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	25/11/2010
Customer Ref	TECHREC SW1 17/11/10	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
COD (Surface Water)	107	Colorimetry	70	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	<2.6	ug/L	
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	47	mg/L	

Signed : _____

Katherine McQuillan - Technical Manager

Date : 25/11/10

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email Info@euroenv.ie

Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/016/02
		Date of Receipt	19/11/2010
		Date Testing Commenced	19/11/2010
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	25/11/2010
Customer Ref	TECHREC SW5 17/11/10	*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 : _____ ***Date :*** 25/11/10

Katherine McQuillan - Technical 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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Email	heather.loughlin@fraoch.ie
Date	13 January 2011

Patrick O'Neill
One51 Group PLC
151 Thomas Street
Dublin 8

Dear Patrick

Waste Licence WO233-01: Annual Storm Water Monitoring, December 2010

In accordance with the requirements of Schedule C2.3 of Waste Licence WO233-01 (Techrec), annual storm water monitoring was carried out at Immark on 12th December 2010. 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 for SW1 and SW5 show elevated levels of 548.71 ug/l and 3003.84 ug/l respectively.

Yours sincerely

H.M Loughlin

Heather Loughlin
Principal Consultant

Appendix 1: Certificates of Analysis (8 pages)

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Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/017/01
		Date of Receipt	16/12/2010
		Date Testing Commenced	16/12/2010
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	06/01/2011
Customer Ref	TECHREC SW1 15/12/10	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
1,1,1,2-Tetrachloroethane (Surface	154	GCMS	<0.37	ug/L	UKAS
1,1,1-Trichloroethane (Surface Wat	154	GCMS	<0.53	ug/L	UKAS
1,1,2,2-Tetrachloroethane (Surface	154	GCMS	<5.00	ug/L	
1,1,2-Trichloroethane (Surface Wat	154	GCMS	<1.71	ug/L	UKAS
1,1-Dichloroethane (Surface Water)	154	GCMS	<0.88	ug/L	UKAS
1,1-Dichloroethene (Surface Water)	154	GCMS	<0.56	ug/L	UKAS
1,1-Dichloropropene (Surface Water	154	GCMS	<0.46	ug/L	UKAS
1,2,3-Trichlorobenzene (Surface Wa	154	GCMS	<0.66	ug/L	UKAS
1,2,3-Trichloropropane (Surface Wa	154	GCMS	<0.90	ug/L	UKAS
1,2,4-Trichlorobenzene (Surface Wa	154	GCMS	<0.48	ug/L	UKAS
1,2,4-Trimethylbenzene (Surface W	154	GCMS	<0.51	ug/L	UKAS
1,2-Dibromo-3-chloropropane (Surf	154	GCMS	<5.00	ug/L	
1,2-Dibromoethane (Surface Water)	154	GCMS	<0.93	ug/L	UKAS
1,2-Dichlorobenzene (Surface Wate	154	GCMS	<0.33	ug/L	UKAS
1,2-Dichloroethane (Surface Water)	154	GCMS	<0.44	ug/L	UKAS
1,2-Dichloropropane (Surface Water	154	GCMS	<0.90	ug/L	UKAS
1,3,5-Trimethylbenzene (Surface W	154	GCMS	<0.39	ug/L	UKAS
1,3-Dichlorobenzene (Surface Wate	154	GCMS	<0.39	ug/L	UKAS
1,3-Dichloropropane (Surface Water	154	GCMS	<0.73	ug/L	UKAS
1,4-Dichlorobenzene (Surface Wate	154	GCMS	<0.33	ug/L	UKAS
2,2-Dichloropropane (Surface Water	154	GCMS	<5.00	ug/L	
2-Chlorotoluene (Surface Water)	154	GCMS	<0.24	ug/L	UKAS
4-Chlorotoluene (Surface Water)	154	GCMS	<0.36	ug/L	UKAS
Benzene (Surface Water)	154	GCMS	<0.42	ug/L	UKAS
Boron (Surface Water)	177	ICPMS	12.9	ug/L	UKAS

Signed : _____ *Date :* _____

Katherine McQuillan - Technical 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.*	1115/017/01
		Date of Receipt	16/12/2010
		Date Testing Commenced	16/12/2010
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	06/01/2011
Customer Ref	TECHREC SW1 15/12/10	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Bromobenzene (Surface Water)	154	GCMS	<0.44	ug/L	UKAS
Bromochloromethane (Surface Wat	154	GCMS	<0.71	ug/L	UKAS
Bromodichloromethane (Surface W	154	GCMS	<0.36	ug/L	UKAS
Bromoform (Surface Water)	154	GCMS	<0.48	ug/L	UKAS
Bromomethane (Surface Water)	154	GCMS	<5.00	ug/L	
Cadmium (Surface Water)	177	ICPMS	<0.01	ug/L	UKAS
Calcium (Surface water)	184	ICPMS	16.01	mg/L	UKAS
Carbon tetrachloride (Surface Wate	154	GCMS	<0.44	ug/L	UKAS
Chlorobenzene (Surface Water)	154	GCMS	<0.41	ug/L	UKAS
Chloroethane (Surface Water)	154	GCMS	<5.00	ug/L	
Chloroform (Surface Water)	154	GCMS	<0.44	ug/L	UKAS
Chloromethane (Surface Water)	154	GCMS	<5.00	ug/L	
Chromium (Surface Water)	177	ICPMS	2.8	ug/L	UKAS
cis-1,2-Dichloroethene (Surface Wa	154	GCMS	<0.50	ug/L	UKAS
cis-1,3-Dichloropropene (Surface W	154	GCMS	<0.56	ug/L	UKAS
COD (Surface Water)	107	Colorimetry	10	mg/L	UKAS
Copper (Surface Water)	177	ICPMS	<0.21	ug/L	UKAS
Dibromochloromethane (Surface W	154	GCMS	<0.75	ug/L	UKAS
Dibromomethane (Surface Water)	154	GCMS	<0.68	ug/L	UKAS
Dichlorodifluoromethane (Surface	154	GCMS	<5.00	ug/L	
Dichloromethane (Surface Water)	154	GCMS	<5.00	ug/L	
Ethylbenzene (Surface Water)	154	GCMS	<0.42	ug/L	UKAS
Hexachlorobutadiene (Surface Wat	154	GCMS	<0.32	ug/L	UKAS
Iron (Surface Water)	177	ICPMS	305.5	ug/L	UKAS
Isopropylbenzene (Surface Water)	154	GCMS	<0.62	ug/L	UKAS

Signed : _____ *Date :* _____

Katherine McQuillan - Technical Manager

Acc. : Accredited Parameters by ISO 17025:2005

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services

Environmental Science & Management
Water,Soil & Air Testing

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

Customer	Heather Loughlin	*Lab Report Ref. No.*	1115/017/01
	Fraoch	*Date of Receipt*	16/12/2010
	Crohane	*Date Testing Commenced*	16/12/2010
	Killenaule	*Received or Collected*	Courier: An Post
	Thurles	*Condition on Receipt*	Acceptable
	Co Tipperary	*Date of Report*	06/01/2011
Customer PO		*Sample Type*	Surface Water
Customer Ref	TECHREC SW1 15/12/10		

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Lead (Surface Water)	177	ICPMS	2.6	ug/L	UKAS
m- + p-Xylene (Surface Water)	154	GCMS	<0.73	ug/L	UKAS
Magnesium (Surface water)	184	ICPMS	0.64	mg/L	UKAS
Manganese (Surface Water)	177	ICPMS	18.5	ug/L	UKAS
Mercury (Surface water)	178	ICPMS	<0.03	ug/L	UKAS
Mineral Oil by Calculation	189	GC-FID	548.71	ug/L	
Naphthalene (Surface Water)	154	GCMS	<0.31	ug/L	UKAS
n-Butylbenzene (Surface Water)	154	GCMS	<0.38	ug/L	UKAS
Nickel (Surface Water)	177	ICPMS	<0.27	ug/L	UKAS
n-Propylbenzene (Surface Water)	154	GCMS	<0.24	ug/L	UKAS
o-Xylene (Surface Water)	154	GCMS	<0.18	ug/L	UKAS
p-Isopropyltoluene (Surface Water)	154	GCMS	<0.97	ug/L	UKAS
Potassium (Surface water)	184	ICPMS	0.55	mg/L	UKAS
sec-Butylbenzene (Surface Water)	154	GCMS	<0.50	ug/L	UKAS
SemiVolatile Organic Compounds	155	GCMS	<0.5	ug/L	
Sodium (Surface water)	184	ICPMS	18.48	mg/L	UKAS
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	46	mg/L	
Styrene (Surface Water)	154	GCMS	<0.46	ug/L	UKAS
tert-Butylbenzene (Surface Water)	154	GCMS	<0.45	ug/L	UKAS
Tetrachloroethene (Surface Water)	154	GCMS	<0.33	ug/L	UKAS
Toluene (Surface Water)	154	GCMS	<0.53	ug/L	UKAS
Total Xylene (Surface Water)	154	GCMS	<0.73	ug/L	UKAS
trans-1,2-Dichloroethene (Surface	154	GCMS	<0.31	ug/L	UKAS
trans-1,3-Dichloropropene (Surface	154	GCMS	<0.97	ug/L	UKAS
Trichloroethene (Surface Water)	0	GCMS	<5.00	ug/L	

Signed : _____ *Date :* _____

Katherine McQuillan - Technical Manager

Acc. : Accredited Parameters by ISO 17025:2005

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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.*	1115/017/01
		Date of Receipt	16/12/2010
		Date Testing Commenced	16/12/2010
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	06/01/2011
Customer Ref	TECHREC SW1 15/12/10	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Trichlorofluoromethane (Surface W	154	GCMS	<5.00	ug/L	
Vinyl chloride (Surface Water)	154	GCMS	<5.00	ug/L	
Volatile Organic Compounds	154	GCMS	<1	ug/L	
Zinc (Surface Water)	177	ICPMS	9.7	ug/L	UKAS

Signed : _____ *Date :* _____

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Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/017/02
		Date of Receipt	16/12/2010
		Date Testing Commenced	16/12/2010
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	06/01/2011
Customer Ref	TECHREC SW5 15/12/10	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
1,1,1,2-Tetrachloroethane (Surface	154	GCMS	<0.37	ug/L	UKAS
1,1,1-Trichloroethane (Surface Wat	154	GCMS	<0.53	ug/L	UKAS
1,1,2,2-Tetrachloroethane (Surface	154	GCMS	<5.00	ug/L	
1,1,2-Trichloroethane (Surface Wat	154	GCMS	<1.71	ug/L	UKAS
1,1-Dichloroethane (Surface Water)	154	GCMS	<0.88	ug/L	UKAS
1,1-Dichloroethene (Surface Water)	154	GCMS	<0.56	ug/L	UKAS
1,1-Dichloropropene (Surface Water	154	GCMS	<0.46	ug/L	UKAS
1,2,3-Trichlorobenzene (Surface Wa	154	GCMS	<0.66	ug/L	UKAS
1,2,3-Trichloropropane (Surface Wa	154	GCMS	<0.90	ug/L	UKAS
1,2,4-Trichlorobenzene (Surface Wa	154	GCMS	<0.48	ug/L	UKAS
1,2,4-Trimethylbenzene (Surface W	154	GCMS	<0.51	ug/L	UKAS
1,2-Dibromo-3-chloropropane (Surf	154	GCMS	<5.00	ug/L	
1,2-Dibromoethane (Surface Water)	154	GCMS	<0.93	ug/L	UKAS
1,2-Dichlorobenzene (Surface Wate	154	GCMS	<0.33	ug/L	UKAS
1,2-Dichloroethane (Surface Water)	154	GCMS	<0.44	ug/L	UKAS
1,2-Dichloropropane (Surface Water	154	GCMS	<0.90	ug/L	UKAS
1,3,5-Trimethylbenzene (Surface W	154	GCMS	<0.39	ug/L	UKAS
1,3-Dichlorobenzene (Surface Wate	154	GCMS	<0.39	ug/L	UKAS
1,3-Dichloropropane (Surface Water	154	GCMS	<0.73	ug/L	UKAS
1,4-Dichlorobenzene (Surface Wate	154	GCMS	<0.33	ug/L	UKAS
2,2-Dichloropropane (Surface Water	154	GCMS	<5.00	ug/L	
2-Chlorotoluene (Surface Water)	154	GCMS	<0.24	ug/L	UKAS
4-Chlorotoluene (Surface Water)	154	GCMS	<0.36	ug/L	UKAS
Benzene (Surface Water)	154	GCMS	<0.42	ug/L	UKAS
Boron (Surface Water)	177	ICPMS	25.8	ug/L	UKAS

Signed : _____ *Date :* _____

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Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/017/02
		Date of Receipt	16/12/2010
		Date Testing Commenced	16/12/2010
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	06/01/2011
Customer Ref	TECHREC SW5 15/12/10	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Bromobenzene (Surface Water)	154	GCMS	<0.44	ug/L	UKAS
Bromochloromethane (Surface Wat	154	GCMS	<0.71	ug/L	UKAS
Bromodichloromethane (Surface W	154	GCMS	<0.36	ug/L	UKAS
Bromoform (Surface Water)	154	GCMS	<0.48	ug/L	UKAS
Bromomethane (Surface Water)	154	GCMS	<5.00	ug/L	
Cadmium (Surface Water)	177	ICPMS	0.1	ug/L	UKAS
Calcium (Surface water)	184	ICPMS	20.87	mg/L	UKAS
Carbon tetrachloride (Surface Wate	154	GCMS	<0.44	ug/L	UKAS
Chlorobenzene (Surface Water)	154	GCMS	<0.41	ug/L	UKAS
Chloroethane (Surface Water)	154	GCMS	<5.00	ug/L	
Chloroform (Surface Water)	154	GCMS	<0.44	ug/L	UKAS
Chloromethane (Surface Water)	154	GCMS	<5.00	ug/L	
Chromium (Surface Water)	177	ICPMS	<0.58	ug/L	UKAS
cis-1,2-Dichloroethene (Surface Wa	154	GCMS	<0.50	ug/L	UKAS
cis-1,3-Dichloropropene (Surface W	154	GCMS	<0.56	ug/L	UKAS
COD (Surface Water)	107	Colorimetry	50	mg/L	UKAS
Copper (Surface Water)	177	ICPMS	1	ug/L	UKAS
Dibromochloromethane (Surface W	154	GCMS	<0.75	ug/L	UKAS
Dibromomethane (Surface Water)	154	GCMS	<0.68	ug/L	UKAS
Dichlorodifluoromethane (Surface	154	GCMS	<5.00	ug/L	
Dichloromethane (Surface Water)	154	GCMS	<5.00	ug/L	
Ethylbenzene (Surface Water)	154	GCMS	<0.42	ug/L	UKAS
Hexachlorobutadiene (Surface Wat	154	GCMS	<0.32	ug/L	UKAS
Iron (Surface Water)	177	ICPMS	383.7	ug/L	UKAS
Isopropylbenzene (Surface Water)	154	GCMS	<0.62	ug/L	UKAS

Signed : _____ *Date :* _____

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Customer	Heather Loughlin	*Lab Report Ref. No.*	1115/017/02
	Fraoch	*Date of Receipt*	16/12/2010
	Crohane	*Date Testing Commenced*	16/12/2010
	Killenaule	*Received or Collected*	Courier: An Post
	Thurles	*Condition on Receipt*	Acceptable
	Co Tipperary	*Date of Report*	06/01/2011
Customer PO		*Sample Type*	Surface Water
Customer Ref	TECHREC SW5 15/12/10		

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Lead (Surface Water)	177	ICPMS	5.9	ug/L	UKAS
m- + p-Xylene (Surface Water)	154	GCMS	<0.73	ug/L	UKAS
Magnesium (Surface water)	184	ICPMS	4.77	mg/L	UKAS
Manganese (Surface Water)	177	ICPMS	98.2	ug/L	UKAS
Mercury (Surface water)	178	ICPMS	0.03	ug/L	UKAS
Mineral Oil by Calculation	189	GC-FID	3003.84	ug/L	
Naphthalene (Surface Water)	154	GCMS	<0.31	ug/L	UKAS
n-Butylbenzene (Surface Water)	154	GCMS	<0.38	ug/L	UKAS
Nickel (Surface Water)	177	ICPMS	<0.27	ug/L	UKAS
n-Propylbenzene (Surface Water)	154	GCMS	<0.24	ug/L	UKAS
o-Xylene (Surface Water)	154	GCMS	<0.18	ug/L	UKAS
p-Isopropyltoluene (Surface Water)	154	GCMS	<0.97	ug/L	UKAS
Potassium (Surface water)	184	ICPMS	1.49	mg/L	UKAS
sec-Butylbenzene (Surface Water)	154	GCMS	<0.50	ug/L	UKAS
SemiVolatile Organic Compounds	155	GCMS	<0.5	ug/L	
Sodium (Surface water)	184	ICPMS	35.09	mg/L	UKAS
Solids (Total Suspended)	106	Filtration/ Drying @ 104C	20	mg/L	
Styrene (Surface Water)	154	GCMS	<0.46	ug/L	UKAS
tert-Butylbenzene (Surface Water)	154	GCMS	<0.45	ug/L	UKAS
Tetrachloroethene (Surface Water)	154	GCMS	<0.33	ug/L	UKAS
Toluene (Surface Water)	154	GCMS	<0.53	ug/L	UKAS
Total Xylene (Surface Water)	154	GCMS	<0.73	ug/L	UKAS
trans-1,2-Dichloroethene (Surface	154	GCMS	<0.31	ug/L	UKAS
trans-1,3-Dichloropropene (Surface	154	GCMS	<0.97	ug/L	UKAS
Trichloroethene (Surface Water)	0	GCMS	<5.00	ug/L	

Signed : _____ *Date :* _____

Katherine McQuillan - Technical Manager

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Customer	Heather Loughlin Fraoch Crohane Killenaule Thurles Co Tipperary	*Lab Report Ref. No.*	1115/017/02
		Date of Receipt	16/12/2010
		Date Testing Commenced	16/12/2010
		Received or Collected	Courier: An Post
		Condition on Receipt	Acceptable
Customer PO		*Date of Report*	06/01/2011
Customer Ref	TECHREC SW5 15/12/10	*Sample Type*	Surface Water

CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
Trichlorofluoromethane (Surface W	154	GCMS	<5.00	ug/L	
Vinyl chloride (Surface Water)	154	GCMS	<5.00	ug/L	
Volatile Organic Compounds	154	GCMS	<1	ug/L	
Zinc (Surface Water)	177	ICPMS	13.3	ug/L	UKAS

Signed : _____ *Date :* _____

Katherine McQuillan - Technical Manager

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Appendix 2:EPA letter re noise assessment

Office of
Environmental
Enforcement

Environmental Protection Agency
Regional Inspectorate, McCumiskey House
Richview, Clonskeagh Road, Dublin 14, Ireland
An Ghníomhaireacht um Chaomhnú Comhshaoi
Cigireacht Réigiúnach, Teach Mhic Chumascaigh
Dea-Radharc, Bóthar Cluain Sceach
Baile Átha Cliath 14, Éire

T: +353 1 268 0100
F: +353 1 268 0199
E: info@epa.ie
W: www.epa.ie

LoCall: 1890 33 55 99

Mr Gerard Killen
Immark Ireland Limited
Unit 51
Park West Industrial Estate
Nangor Road
Dublin 12

FAO: Patrick O'Neill

02/11/10

Our Ref: W0233-01/gc01dh

Re: Waste Licence Reg. No. W0233-01 - Condition 6.10

Dear Mr Killen

I refer to e-mail correspondence on your behalf dated 27/10/10 and correspondence attached therein in relation to the above.

Having regard to the contents of the above correspondence and your waste licence the Agency agrees to your request that a noise survey not be required at this time subject to advance written notice being submitted to the Agency of any intention to recommence waste activities at the facility.

Please quote the above reference in future correspondence in relation to this matter.

Yours sincerely

Donal Howley
Inspector
Office of Environmental Enforcement

Appendix 3: Worksheet AER Returns

| PRTR# : W0233 | Facility Name : Immark Ireland Ltd | Filename : W0233_2010.xls | Return Year : 2010 |

Environmental Protection Agency

Guidance to completing the PRTR workbook

AER Returns Workbook

Version 1.1.11

REFERENCE YEAR	2010

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	Mr Patrick O'Neill
AER Returns Contact Email Address	patrick.oneill@techrecni.co.uk
AER Returns Contact Position	Operations Manager
AER Returns Contact Telephone Number	02887789313
AER Returns Contact Mobile Phone Number	078 69284963
AER Returns Contact Fax Number	02887789315
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?	No
Have you been granted an exemption ?	No
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 Link to previous years emissions data | PRTR# : W0233 | Facility Name : Immark Ireland Ltd | Filename : W0233_2010.xls | Return Year : 2010 | 29/03/2011 11:04

SECTION A : SECTOR SPECIFIC PRTR POLLUTANTS

RELEASES TO AIR					Please enter all quantities in this section in KGs			
POLLUTANT		METHOD				QUANTITY		
			Method Used					
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	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					Please enter all quantities in this section in KGs			
POLLUTANT		METHOD				QUANTITY		
			Method Used					
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	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					Please enter all quantities in this section in KGs			
POLLUTANT		METHOD				QUANTITY		
			Method Used					
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	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			Method Used			
	T (Total) kg/Year	**M/C/E**	**Method Code**	**Designation or Description**	**Facility Total Capacity m3 per hour**	
Total estimated methane generation (as per site model)	0.0				N/A	
Methane flared	0.0				0.0	(Total Flaring Capacity)
Methane utilised in engine/s	0.0				0.0	(Total Utilising Capacity)
Net methane emission (as reported in Section A above)	0.0				N/A	

4.2 RELEASES TO WATERS

Link to previous years emissions data

SECTION A : SECTOR SPECIFIC PRTR POLLUTANTS

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 on

RELEASES TO WATERS					Please enter all quantities in this section in KGs			
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	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					Please enter all quantities in this section in KGs			
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	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					Please enter all quantities in this section in KGs			
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	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

Link to previous years emissions data

SECTION A : PRTR POLLUTANTS

OFFSITE TRANSFER OF POLLUTANTS DESTINED FOR WASTE-WATER TREATMENT OR SEWER					Please enter all quantities in this section in KGs			
POLLUTANT		METHOD			QUANTITY			
			Method Used					
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	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					Please enter all quantities in this section in KGs			
POLLUTANT		METHOD			QUANTITY			
			Method Used					
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	0.0

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

4.4 RELEASES TO LAND Link to previous years emissions data | PRTR# : W0233 | Facility Name : Immark Ireland Ltd | Filename : W0233_2010.xls | Return Year : 2010 | 29/03/2011 11:07

SECTION A : PRTR POLLUTANTS

RELEASES TO LAND					Please enter all quantities in this section in KGs		
POLLUTANT		METHOD			QUANTITY		
			Method Used				
No. Annex II	Name	M/C/E	Method Code	Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) 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)

RELEASES TO LAND					Please enter all quantities in this section in KGs		
POLLUTANT		METHOD			QUANTITY		
			Method Used				
Pollutant No.	Name	M/C/E	Method Code	Designation or Description	Emission Point 1	T (Total) KG/Year	A (Accidental) 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

5. ONSITE TREATMENT & OFFSITE TRANSFERS OF WASTE

(PRTR# : W0233 | Facility Name : Immark Ireland Ltd | Filename : W0233_2010 Parkwest.xlsx | Return Year : 2010 | 29/03/2011 13:13

Please enter all quantities on this sheet in Tonnes

12

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	19 12 04	No	8.9	plastic and rubber	R3	M	Weighed	Offsite in Ireland	Greenstar Recycling and Recovery Ltd ,WO 183-01	Millenium Business Park,Ballycoolin,,,Dublin 11, Ireland		
Within the Country	16 06 01	Yes	0.48	lead batteries	R13	M	Weighed	Offsite in Ireland	Rilta Enviornmental Ltd,W0192-03	Block 402 Greenogue Business Park,Rathcoole,,Co Dublin,Ireland	HJ Enthoven,BL 5598,Darley Dale Matlock,Derbyshire,,DB 23 LP,United Kingdom	Darley Dale Matlock,Derbyshire,,DB 23 LP,United Kingdom
Within the Country	16 02 15	Yes	1.48	Cartridge/Toner - Miscellaneous	R13	M	Weighed	Offsite in Ireland	Rilta Enviornmental Ltd,W0192-03	Block 402 Greenogue Business Park,Rathcoole,,Co Dublin,Ireland	Avolstoffen Terminal Moerdijk,Ref: 1538449,BV,Moerdijk,,,,Netherlands	BV,Moerdijk,,,,Netherlands
Within the Country	16 02 13	Yes	6.56	discarded equipment containing hazardous components (16) other than those mentioned in 16 02 09 to 16 02 12	R13	M	Weighed	Offsite in Ireland	The Recycling Village,WP 2007/20	The Recycling Village,WP 2007/20,Unit 4a Tenure Business Park,Monasterboice,Drogheda,,Ireland	Unit 4a Tenure Business Park,Monasterboice,Drogheda,,Ireland	Unit 4a Tenure Business Park,Monasterboice,Drogheda,,Ireland
To Other Countries	17 04 11	No	0.575	cables other than those mentioned in 17 04 10	R4	M	Weighed	Abroad	Remet Works,.	9 Cody Business Centre,Cody Road,London,E16 4SR,United Kingdom		
To Other Countries	16 02 14	No	16.64	PC boxes/ Servers	R4	M	Weighed	Abroad	Remet Works,.	9 Cody Business Centre,Cody Road,London,E16 4SR,United Kingdom		
To Other Countries	16 02 16	No	1.09	components removed from discarded equipment other than those mentioned in 16 02 15	R4	M	Weighed	Abroad	Remet Works,.	9 Cody Business Centre,Cody Road,London,E16 4SR,United Kingdom		
To Other Countries	**19 12 04**	**No**	18.84	Mixed Plastic	R3	M	Weighed	Abroad	Roydon Polythene exports Ltd,.	Fieldhouse Industrial Estate,Rochdale,Lancs,OL1 2OAA,United Kingdom		
Within the Country	19 12 02	No	219.9	ferrous metal	R4	M	Weighed	Offsite in Ireland	A1 Metals Recycling,.	Acragar,Mountmellick,Co Laois,,Ireland		
Within the Country	19 12 03	No	20.0	non-ferrous metal	R4	M	Weighed	Onsite in Ireland	A1 Metals Recycling,.	Acragar,Mountmellick,Co Laois,,Ireland		
To Other Countries	16 02 11	Yes	828.7	discarded equipment containing chlorofluorocarbons, HCFC, HFC	R13	M	Weighed	Abroad	Techrec NI Ltd,LN/08/122	110 Trewmount Rd,Killyman,Dungannon,BT 71 7EF,United Kingdom	Techrec NI Ltd,LN/08/122,110 Trewmount Rd,Killyman,Dungannon,BT 71 7EF,United Kingdom	110 Trewmount Rd,Killyman,Dungannon,BT 71 7EF,United Kingdom

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

Appendix 4: 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***

immark	**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 5: EPA Licence Surrender Letter & OCM Closure Audit

Office of
Environmental
Enforcement

Environmental Protection Agency
Regional Inspectorate, McCumiskey House
Richview, Clonskeagh Road, Dublin 14, Ireland
An Ghníomhaireacht um Chaomhnú Comhshaoil
Cigireacht Réigiúnach, Teach Mhic Chumascaigh
Dea-Radharc, Bóthar Cluain Sceach
Baile Atha Cliath 14, Éire

T: +353 1 268 0100
F: +353 1 268 0199
E: info@epa.ie
W: www.epa.ie

LoCall: 1890 33 55 99

Mr Gerard Killen
Immark Ireland Limited
Unit 51
Park West Industrial Estate
Nangor Road
Dublin 12

15/12/2010 Our Ref: W0233-01/gc02dh

Notice under Section 48 of the Waste Management Acts 1996 to 2003

Dear Mr Killen

I confirm receipt of your correspondence and fee dated 30/11/10, received by the Agency on 13/12/10, requesting the surrender of Waste Licence Reg. No. W0233-01 in accordance with Section 48 of the Waste Management Acts 1996 to 2003).

Please quote the above reference in future correspondence in relation to this matter.

Yours sincerely

Donal Howley
Inspector
Office of Environmental Enforcement

\\Owl\OEE\05. Licence Enforcement\Waste Licence Enforcement\Waste DB Documents\W0233-01\gc02dh.docx

Granary House
Rutland Street
Cork

Tel. (021)4321521
Fax. (021)4321522

CLOSURE AUDIT OF

IMMARK IRELAND LTD

UNIT 51 PARK WEST INDUSTRIAL ESTATE,

NANGOR ROAD

DUBLIN 12

Prepared For: -

One51

Unit 51 Park West Industrial Estate,

Nangor Raod,

Dublin12.

Prepared By: -

O' Callaghan Moran & Associates,
Granary House,
Rutland Street,
Cork.

February 2011

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1. INTRODUCTION

Immark Ireland Ltd (Immark) requested O'Callaghan Moran & Associates (OCM) to complete a closure audit of its facility at Waste Licensed (Reg No W0233-01) facility at the Nangor Road.

Waste processing at the facility ceased in April 2010. The majority of the materials and wastes on site at the time were removed and the processing equipment dismantled and shipped from the site. The facility continued to be used up to July 2010 as a transfer station for refrigeration units, which solely involved storage in curtain sided trailers.

In November 2010, One51 applied to the Environmental Protection Agency (the Agency) to surrender the Waste Licence. In response, the Agency requested a closure audit of the facility be completed by an independent expert to identify 'the decommissioning, rendering safe or removal for disposal/recovery of any soil, subsoils, buildings, plant or equipment, or any waste materials or substances or any other matter contained therein or thereon that may result in environmental pollution.' One51 appointed O'Callaghan Moran & Associates to conduct the closure audit.

1.1 Methodology

OCM reviewed the Preliminary Closure Plan prepared as part of the Waste Licence Application and the available desk study information (Licence Application, routine monitoring reports and the Annual Environmental Reports for 2008 and 2009) to obtain an understanding of the baseline environmental conditions and the waste activities that had been carried out.

OCM completed a site inspection on the 19th January. OCM met and interviewed Mr. Patrick O'Neill of One51 who provided information on the site history, waste processes, environmental monitoring, and the implementation of the Closure Plan. OCM inspected the entire facility including the interior and exterior of the building and the external vehicle manoeuvring areas.

2. FACILITY DESCRIPTION

2.1 Location

The facility is located on Henry Road, off the main access road to the Park West Industrial Estate. The Estate is 8.5 kilometers south-west of Dublin City Centre and within 1.5 kilometers (km) of the M50/Naas Road interchange. The Industrial Estate is accessed via the Nangor Road and Killeen Roads, which directly connect to the Naas Road.

2.2 Environmental Setting

2.2.1 Geology & Hydrogeology

The development of the Industrial Estate involved significant landscaping using onsite materials to raise the ground to construction formation level. Therefore, the upper layers (0.5 – 2m) of soil is characterised as made ground comprising gravely clay fill. This is underlain by a stiff grey/brown boulder clay lies. Boulder clays typically have a low permeability rate (10-7 to 10-10 m/s).

The site is situated at the centre of the Dublin Basin. The underlying rocks form part of the Calp Formation, which predominantly comprises the "Dinantian Upper Impure Limestone". The depth to bedrock in the area is reported to be between 5-10m below ground level.

The Geological Survey of Ireland has classified the Calp Limestone as a 'locally important aquifer which is generally moderately productive'. The aquifer vulnerability rating is Moderate. There is no record of any groundwater wells within 500m of the facility. The groundwater flow direction has not been definitively established, however, the most likely scenario is that it flows north-easterly towards the River Liffey.

2.2.2 Surface Water

The site is in the catchment of the River Cammock, which is 800m to the south east. The site drainage layout is shown on Drawing No 09 in Appendix 2. Surface water from the roof and surrounding paved areas, including the loading bays, enters gullies along the southern, western and northern sides of the building which connect to the storm sewer serving the Industrial Estate north of the site. There are no silt traps or oil interceptors on the facility drainage system.

2.2.3 Surrounding Land Use and Sensitive Receptors

The surrounding lands have been extensively developed for commercial and light industrial use. The occupants of the lots immediately surrounding the site are:

North: Thorntons Recycling,

South: Goode Concrete and ALPI Ireland;

East: Carroll Joinery;

West: Bunzl Safety Equipment distribution centre, Shred-It and File Store offices.

The nearest residential premises are located approximately 160m south-east of the site.

2.3 Site History

The Park West Industrial Estate was developed in the late 1990's and early 2000's. The subject site was one of number of units for which planning permission was granted in 2000. The site was developed over the period from 2000 to 2002 on what was then reportedly an undeveloped greenfield.

As part of the planning application for the Industrial Estate, a full environmental impact assessment was undertaken, which included investigations to identify the potential for soil/groundwater contamination on site. No contamination was reportedly identified and no remediation was deemed necessary.

The subject site was originally occupied by Roches Stores, (from 2002-2005), and was used as a warehouse and distribution centre for their retail stock. The site was acquired by Newtown Investments Ltd, which is now a wholly owned subsidiary of the One51 group of companies. Newtown Investments Ltd leased the site to TechRec, who commenced WEEE recovery activities in November 2005.

The facility initially operated under a Waste Permit issued by the Dublin City Council that approved the processing of up to 5,000 tonnes of WEEE per year. TechRec applied for a Waste Licence in 2006 and this was issued in March 2007. In 2006, the facility achieved certification to ISO EMS 14001:2004. In 2008, Immark took over the Licence and operation of the facility.

On the 6th of February 2009, Immark suspended waste processing activities and notified the Agency. Waste activities resumed on 10th of March 2009. Due to the reduction in household WEEE contracts, the focus of operations changed to metal recycling, while at the same time maintaining the Business to Business WEEE service. This change was approved by the Agency in correspondence dated the 3/07/09.

Waste processing at the facility ceased in April 2010. The Licensee then implemented the Closure Plan, which involved removing the majority of the materials and wastes and the dismantling and sale to the original suppliers of the processing equipment. Until July 2010, the facility continued to be used as a transfer station for refrigeration units, which solely involved storage in curtain sided trailers.

2.4 Layout

The facility comprises a single building of 3,672m^2, as shown on Drawing No 10 in Appendix 2. The building is a detached hi-bay warehouse/industrial unit of a steel portal-frame construction, and is finished externally with part rendered blockwork, part pre-coated insulated steel cladding, together with a power floated finished concrete floor. There are four dock level loading doors and three roller shutter doors along the northern frontage

Internally, there is a two storey concrete block construction office (121m^2) at the northern end of the building, between the loading dock and the roller shutter doors. At the southern end, there is an electrical sub-station. When the facility was operational there was a portakbin at the north western side of the building that housed staff welfare facilities.

The floor of the building is paved with concrete and at the time of OCM's inspection appeared in good condition. There are no floor drains, but in the eastern end, where the staff welfare portakabin was located, is a connection to the sanitary wastewater sewer (Photograph 1 in Appendix 1). There is an open concrete lined pit (Photograph 2) near the northern side to building, which was the loading area for a conveyor.

At the time of OCM's site inspection, there were no underground or above ground fuel/ chemical storage tanks present. When the facility was operational, it is understood that diesel for the mobile plant was stored in a portable storage tank provided with integral secondary containment and the heating was provided by wall mounted gas powered heaters.

There is a weighbridge in front of the building adjacent to the loading dock. The loading dock, which slopes towards the building and the open areas around the building are paved. The building is surrounded by concrete paving/footpath (1.2m wide), on all sides, except along the loading bay (to the north). These areas extend from the edge of the building to the site boundary. All other external areas to the east, south and west are covered with tarmacadam.

At the time of OCM's inspection there were seven (7No) empty metal sided trailers parked in the loading dock and in front of the roller shutter doors (Photograph 3). OCM inspected the surface water gullies and did not observe any visual evidence of contamination. An ACO drain at the upper end of the loading dock was partially blocked with sediment.

2.5 Site Services

Electricity

An electricity sub-station and associated services and switch-rooms are located in the south-west corner of the building The substation is owned and was operated by the Licensee and contains:

- ESB Room housing ESB medium voltage switch gear.
- TechRec M. V. Switch-room housing 10 KV switchgear, a Battery Tripping Alarm Panel and an • ESB Metering cabinet
- TechRec MV – LV Transformer Room housing 1,000 KVA ONAN oil filled transformer, and
- TechRec LV Switchroom housing the main switch room, distribution switch board and power factor correction unit.:

Compressed Air

Compressed air was provided by a Kaeser air compressor which was located internally beside the LV Switchroom in the southeast corner of the building. Condensate emissions were treated in a dedicated oil/water separator. The treated water was collected and disposed of off-site.

Water Supply

All water used at the facility was sourced solely from the Dublin City Council mains supply. There are no groundwater or surface water abstraction points used by the Site.

Sanitary Wastewater

Sanitary waste water from toilets in the offices and staff welfare facilities discharged to the two foul sewers installed below the building floor, which join and connect via a single outlet to the foul sewer serving the Industrial Estate at a point near the south eastern end of the building

Telecommunications

Telephone, fax and Information Technology connections are located in the ground floor of the offices.

Gas

There is a piped gas supply which enters the building at in the north-east corner which was used in wall mounted space heaters.

2.6 Waste Activities

When operational the WEEE recycling activities involved the following four staged separation process, which included the following:

•

- Module 1: Goods receipt, sorting, dismantling and Cathode Ray Tube (CRT) processing;
- Module 2: Preliminary breakdown and separation;
- Module 3: Secondary breakdown and mechanical separation; and
- Module 4: Fine separation.

The WEEE was initially separated at the point of acceptance into the following categories;

- Small WEEE that can go straight into the process at Module 2;
- Large WEEE which requires some degree of manual dismantling in Module 1, prior to proceeding to Module 2;
- WEEE containing CRT which was placed in the "CRT Storage Area" prior to being processed through a specialist separation unit (part of Module 1);
- WEEE containing oil or other fluid which drained at the "Oil Separation Station" prior to processing (through either Module 1 or 2 depending on size);
- Ozone Depleting Substance (ODS) containing equipment (e.g. fridges and freezers), stored in the "Fridge and Freezer Area" prior to being transferred offsite with an appropriately licensed contractor for recycling; and
- Florescent light tubes were stored in purpose designed lamp coffins in the "Hazardous Waste Storage" area, prior to being sent to an appropriately licensed treatment facility.

The process layout is shown on Drawing No 04 in Appendix 2. It included initial manual separation followed by preliminary breakdown using rotating chains (QZ Machine) and then mechanical treatment using magnetic, electrostatic and cyclone separators, sieves, picking stations and a Hammer Mill.

Diesel fuelled forklifts, a front loading shovel and a telescopic arm were used to move materials. The processing plant and equipment used hydraulic and coolant oils. The diesel was stored in a purpose designed portable 1,200 litre aboveground storage tank, provided with integrated secondary containment for both the tank and the fill point. The tank was always stored and refilled inside the building. It is understood that the hydraulic and coolant oils were stored inside the building on bunded pallets.

A Waste Quarantine Area was provided in the north western part of the building, where materials unsuitable for processing were temporarily stored. The area comprised dedicated storage bins located on bunded pallets. The materials stored included batteries, transformers, capacitor, fluorescent tubes and waste oil generated during plant maintenance.

2.6.1 Emissions

The process involved the manual sorting and dismantling of the WEEE and its subsequent automated and manual separation into its component fractions. The process was dry and did not generate of any process effluent. However, some items needed be drained of oil or water prior to processing and this was collected and stored in the Quarantine Area pending consignment from the site.

There was no direct or indirect discharge to ground or groundwater. The only discharge to surface water was run-off from the roofs and open paved areas around the building. No wastes were stored or handled outside the building. The quality of the water in the surface water drains was monitored at five locations on the storm sewer

There were two point source air emissions from the dust abatement systems installed to control dusts generated by the QZ Machine and the Hammer Mill. These emissions were monitored bi-annually for particulates, chromium and nickel. The monitoring confirmed the emissions complied with the limit values set in the Licence.

2.7 Environmental Monitoring

The environmental monitoring programme specified in the Licence includes air emission testing, surface water quality monitoring and noise surveys. It is understood that the monitoring conducted when the facility was operational confirmed that emissions complied with the relevant emission limit values set in the Licence.

The monitoring programme continued to be implemented following the ending of waste processing, but was amended to reflect the change in emissions, with the noise, dust and air emission monitoring suspended with the Agency's agreement.

The monitoring during the operational and post closure stages has established that site activities have not had any adverse environmental impacts. The most recent surface water monitoring (December 2010) identified the presence of low levels of oil at the two sampling points (0.55mg/l at SW-1 and 3mg/l at SW-5). The monitoring locations are shown on Drawing No 09 and the monitoring report is included in Appendix 3. Low levels of hydrocarbons had previously been occasionally detected at the locations. The levels are not of environmental significance and, as all activities at the site ceased in July 2010, the facility is not the source.

There is no record of any incidents or accidents that occurred either when wastes processing was carried out, or during the implementation of the Closure Plan that had the potential to give rise to environmental pollution.

3. CLOSURE PLAN

The Licensee prepared a Preliminary Closure Plan for the facility at the time the Waste Licence Application was prepared. It was based on the assumption that the on-site plant and equipment will be decommissioned and removed from the site, but that the site infrastructure (i.e. the building and associated services/utilities) will remain and will continue to be used for a similar industrial land use.

The Plan addressed the following areas: -

- Residual and processed WEEE,
- Residual other waste
- Plant decommissioning and removal from site,
- Maintain records of recovery/disposal facility to which the wastes were sent.

It was envisaged that, assuming the absence of environmental liabilities (soil or groundwater contamination), clean closure could be achieved and that therefore long term surveillance monitoring would not be required.

3.1 Residual and Processed WEEE

Following the decision to cease operations, the Licensee stopped taking delivery of WEEE, but continued processing. The plant wind down was carried out over a two week period. The final delivery of waste was accepted on 26th February and processing stopped on 9th April 2010. At the time of OCM's inspection on the 19th January 2010 there was no residual/processed WEEE, or metal wastes on site.

3.2 Plant Decommissioning and Removal

The mobile plant (forklifts, loader and telescopic arm) and oil storage tank were deployed to other One51 facilities. Immark shut down motive power to the processing plant prior to their cleaning and dismantling. It is understood that specialist cleaning of the plant we not required.

An agreement was reached with the original supplier of the processing plant. Immark AG based in Switzerland, to purchase the majority of the equipment. The plant was cleaned down, dismantled and shipped from the site in 2010. A shaft shredder used for processing Large Domestic Appliances was sold to a One 51 subsidiary Glassdon Recycling in Northern Ireland. Other plant items were distributed to other facilities within the Group. Any obsolete equipment was removed from the site and sent to a recycling facility

Immark did not fully complete the plant clean out in 2010, but restarted this in January 2011. At the time of OCM's inspection the majority of the processing plant and equipment had been removed from the site and the building was essentially empty (Photograph 4). The only functional plant item remaining on site was a baler (Photograph 5). There was a dismantled dust control hood standing near the north western entrance (Photograph 6).

In addition to the removal of the processing plant, Immark removed the portakabin that housed the staff welfare facilities and also cleaned out the office. At the time of OCM's inspection some office equipment (desks, chairs, shelving and computers) was present in the office.

The electrical equipment in the switch room at the southern end of the building has not been removed and it is intended that this will remain in place for possible use by future occupants of the building.

3.3 Other Wastes

Immark removed the majority of the non-WEEE wastes and these were sent to authorised recycling facilities. At the time of OCM's inspection small quantities of residual wastes remained inside the building. These include seven 25 litre drums of what appeared to be oil sitting inside an open top plastic IBC and wooden pallets (Photograph 7). There was no evidence of any staining on the concrete floor around the IBC.

A ro-ro skip containing a mix of plastic, timber, cardboard and metal was sitting on the floor of the building (Photograph 8). There was no evidence of any staining on the floor around the skip. There were a number of empty wheeled waste storage bins in the centre of the building. OCM did not observe any wastes stored outside the building, but did note some small quantities of litter had accumulated in the area of the loading dock and roller shutter doors, where the trailers were parked (Photograph 9)

OCM observed some water on the floor which had been generated during floor cleaning the previous day. There was no visual evidence that the water was contaminated. As there are no floor drains in the building, the water will evaporate.

4. CONCLUSIONS

4.1 Environmental Liabilities

There were no recognised environmental liabilities associated with the site before the start of the licensed activities and OCM has not identified any actual or potential environmental liabilities associated with? licensed activities. The low levels of oil identified at the surface water monitoring points in the December 2010 monitoring event are not attributed to facility activities.

4.2 Closure Plan Status

The actions implemented by the Licensee following the closure of the facility are consistent with the measures set out in the Preliminary Closure Plan. At the time of OCM' site inspection on the 19th January 2011, the Closure Plan actions were substantially complete.

All WEEE, metal waste and raw materials used in the process had been removed. The processing plant had been dismantled and removed. One functional item of plant (baler) and a scrap dust abatement unit remained inside the building. There were also small amounts of waste oil and non-hazardous solid wastes generated during the building clean-out stored in secure containers awaiting removal. The electrical equipment (transformers and switch gear) remains in place for use by future occupants.

The portakabins used as staff welfare facilities have been removed and the majority of the office equipment removed from the offices, although office furniture and a small amount of IT equipment remain. Seven empty trailers were parked outside the building and a small amount of litter had accumulated in the area.

4.3 Recommendations

OCM recommends that the baler and discarded dust abatement unit be removed from the site. The baler should either be deployed to another recycling facility or sold. The dust abatement unit should be scrapped. Records of the end destination of these items should be submitted to the Agency.

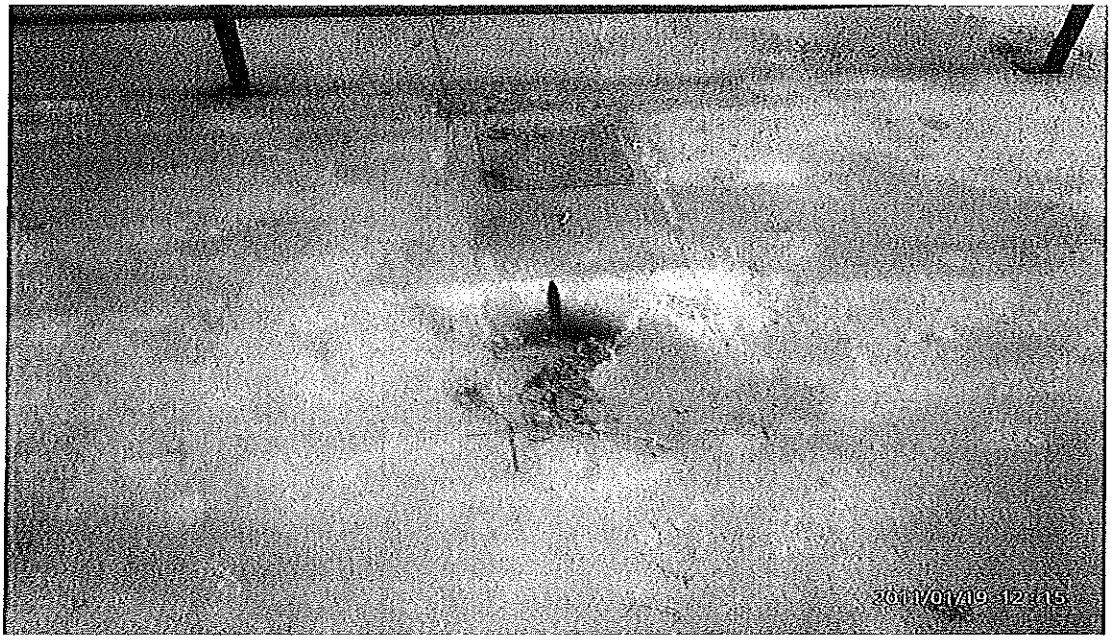
OCM recommend that the remaining small amounts of wastes (waste oil and non hazardous materials in the ro-ro be removed from the site and sent to appropriately licensed recovery/disposal facilities. Records of the end destination should be submitted to the Agency.

OCM recommend that the empty trailers parked at the front of the building be removed and that the litter that has accumulated in the area be collected and disposed of at an appropriately licensed recovery/disposal facility.

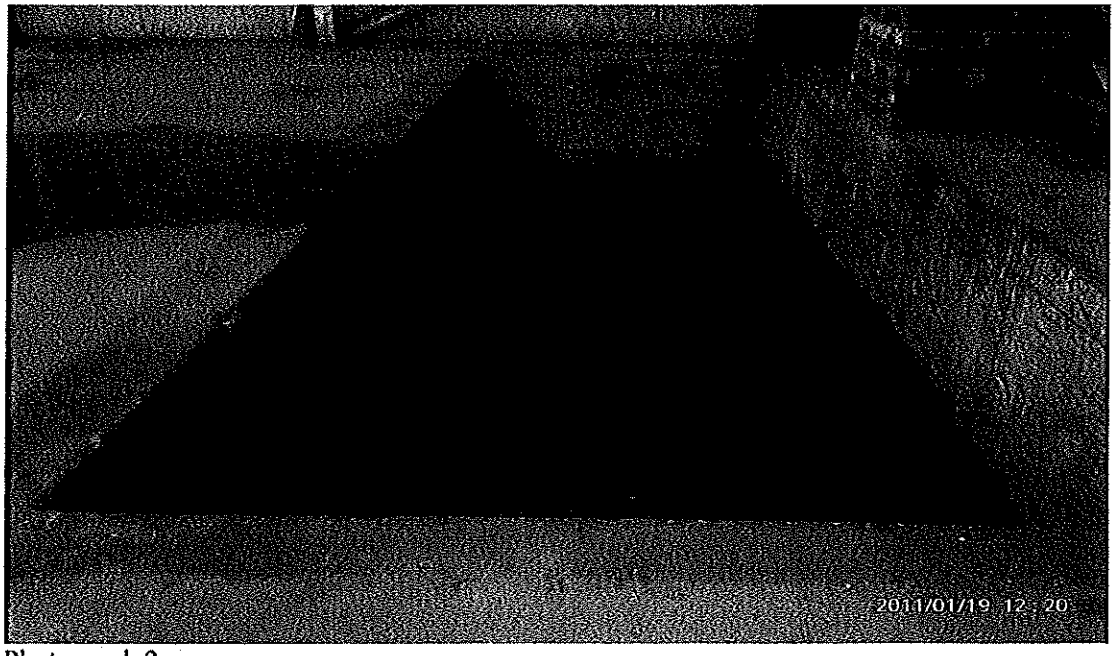
OCM recommend that following completion of these works a final round of surface water monitoring is carried out at SW-1 and SW-2 and the results submitted to the Agency.

APPENDIX 1

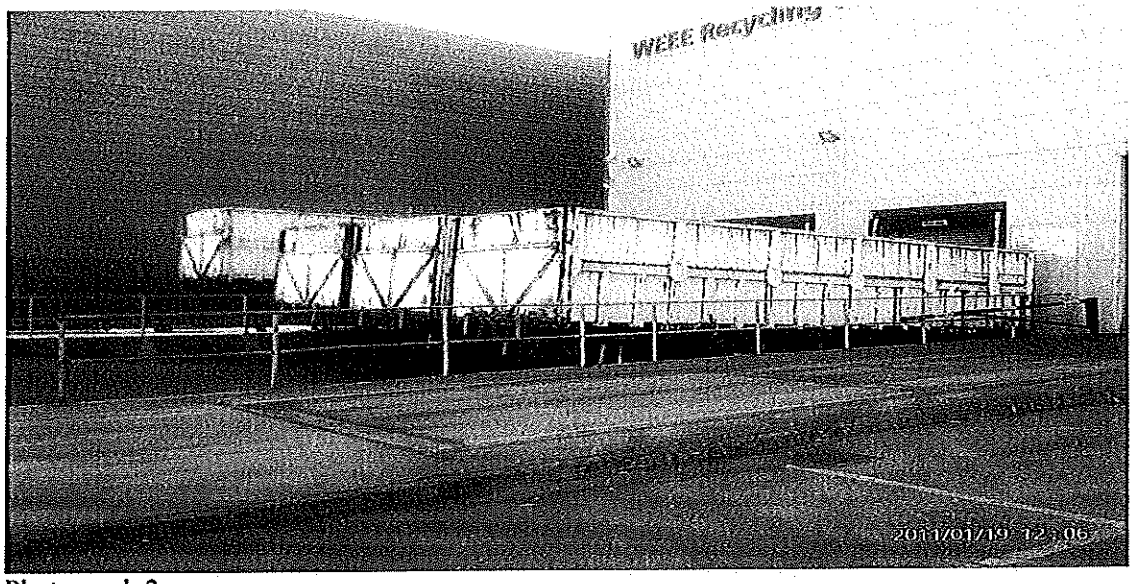
Photographs



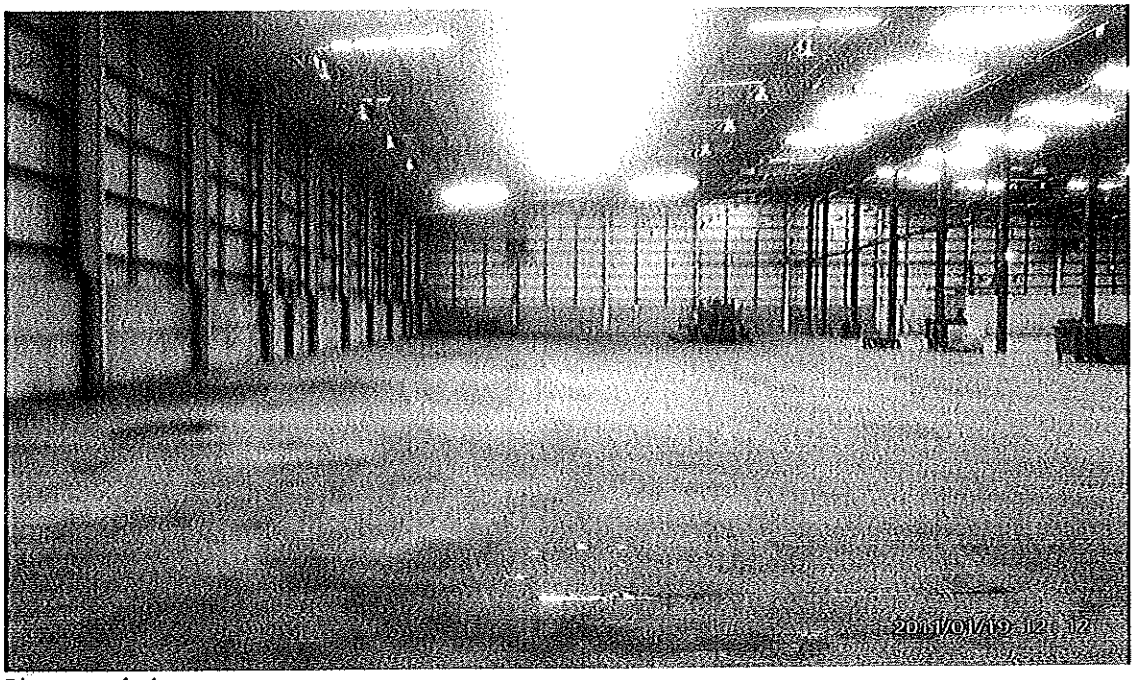
Photograph 1



Photograph 2



Photograph 3



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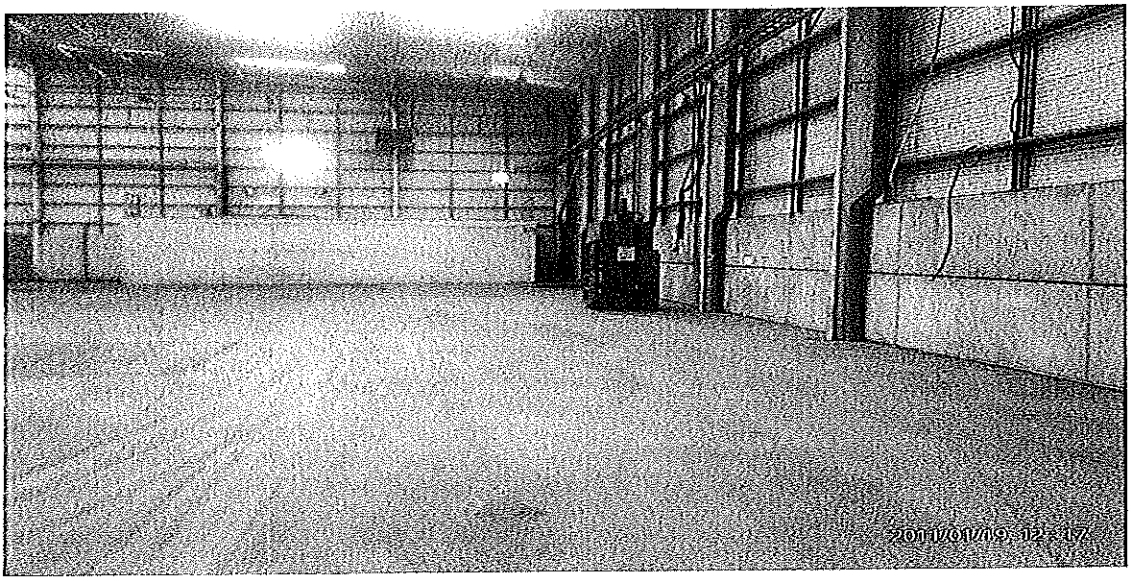

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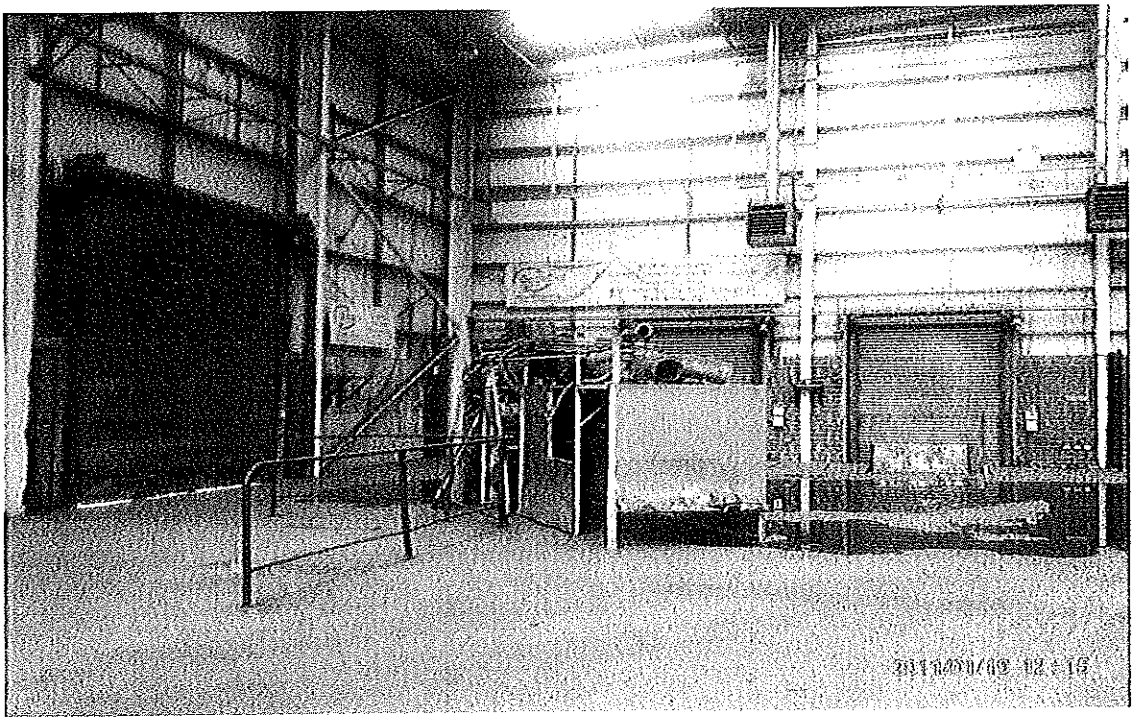

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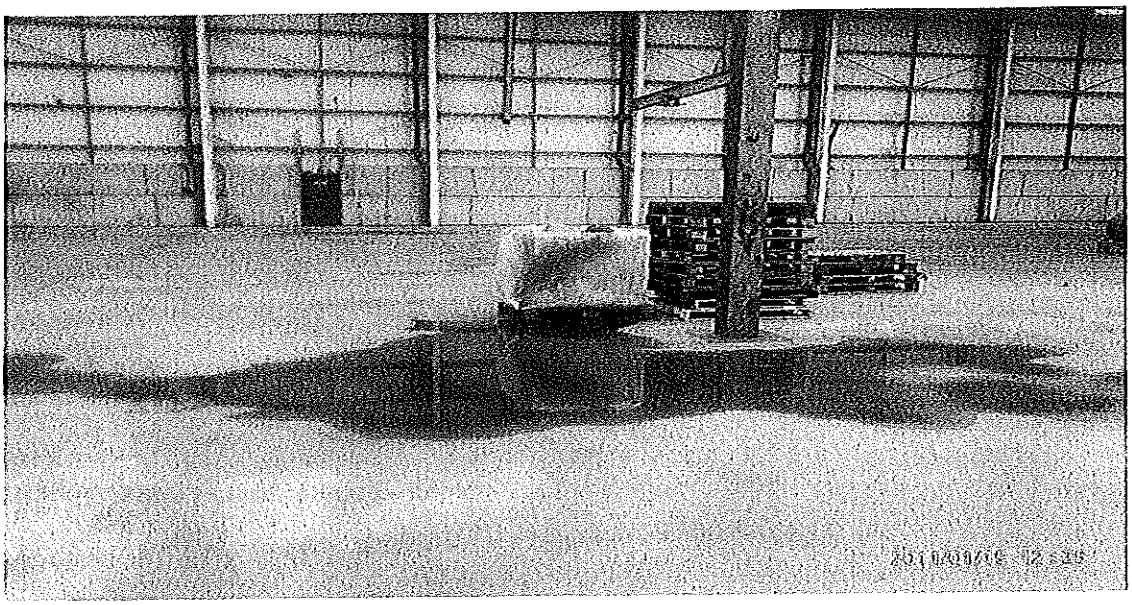
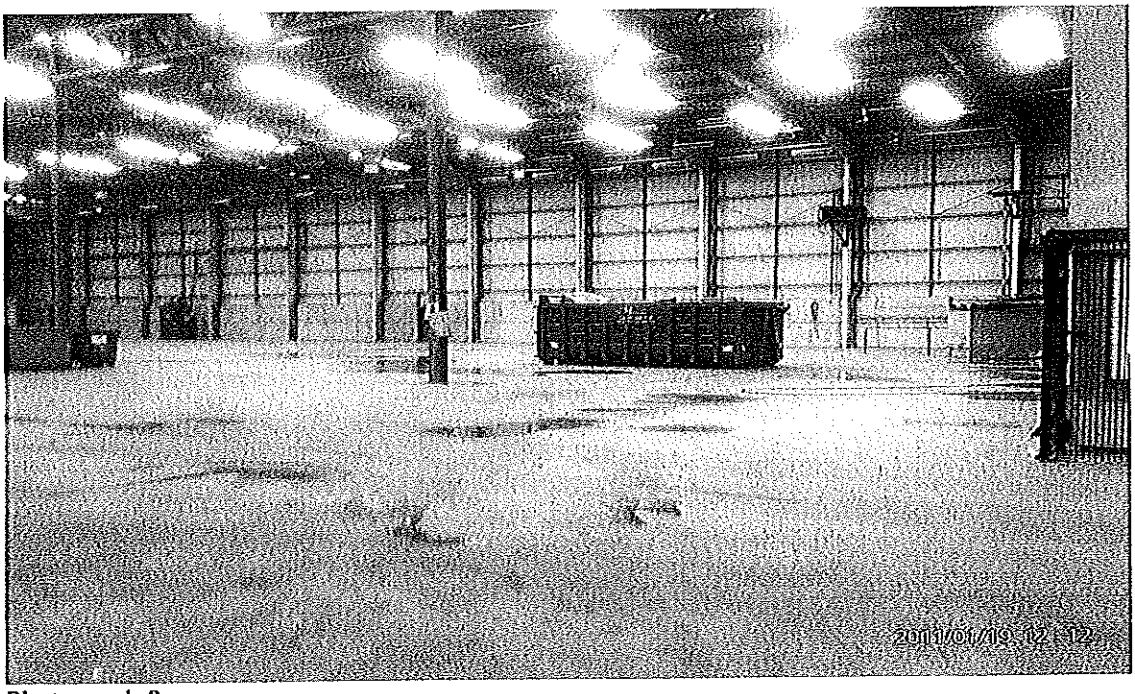


Photograph 7

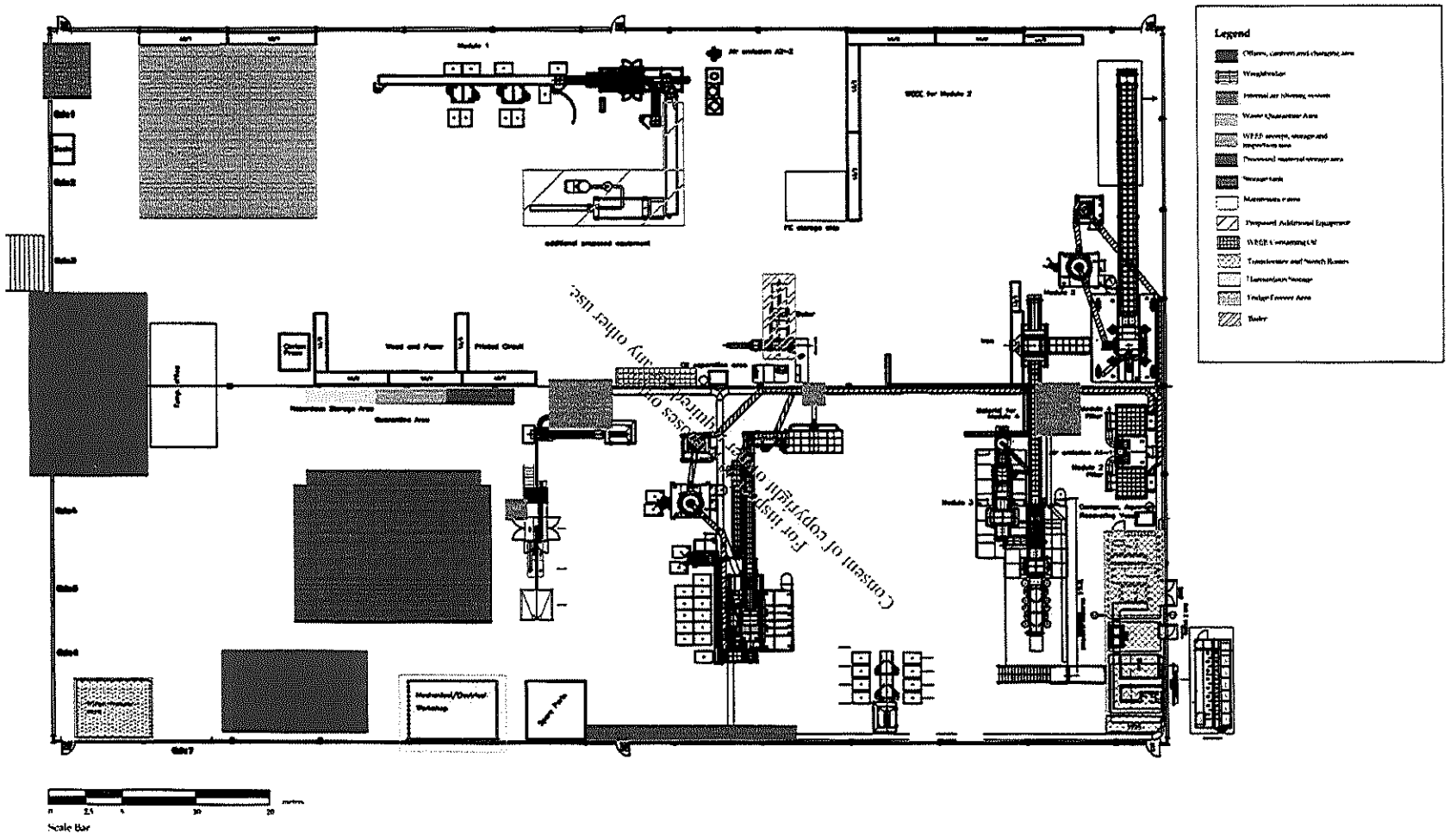


Photograph 8

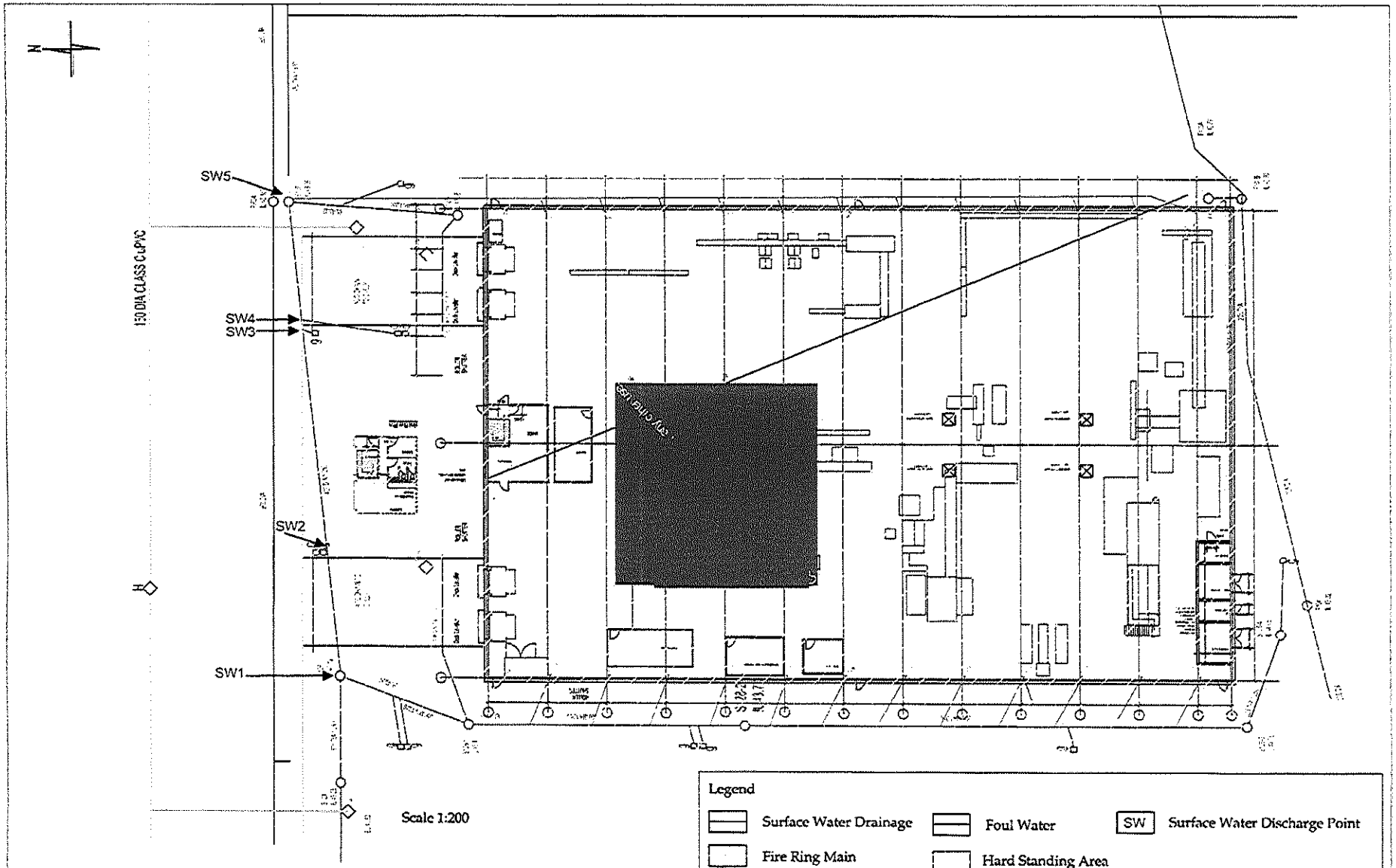
Photograph 9

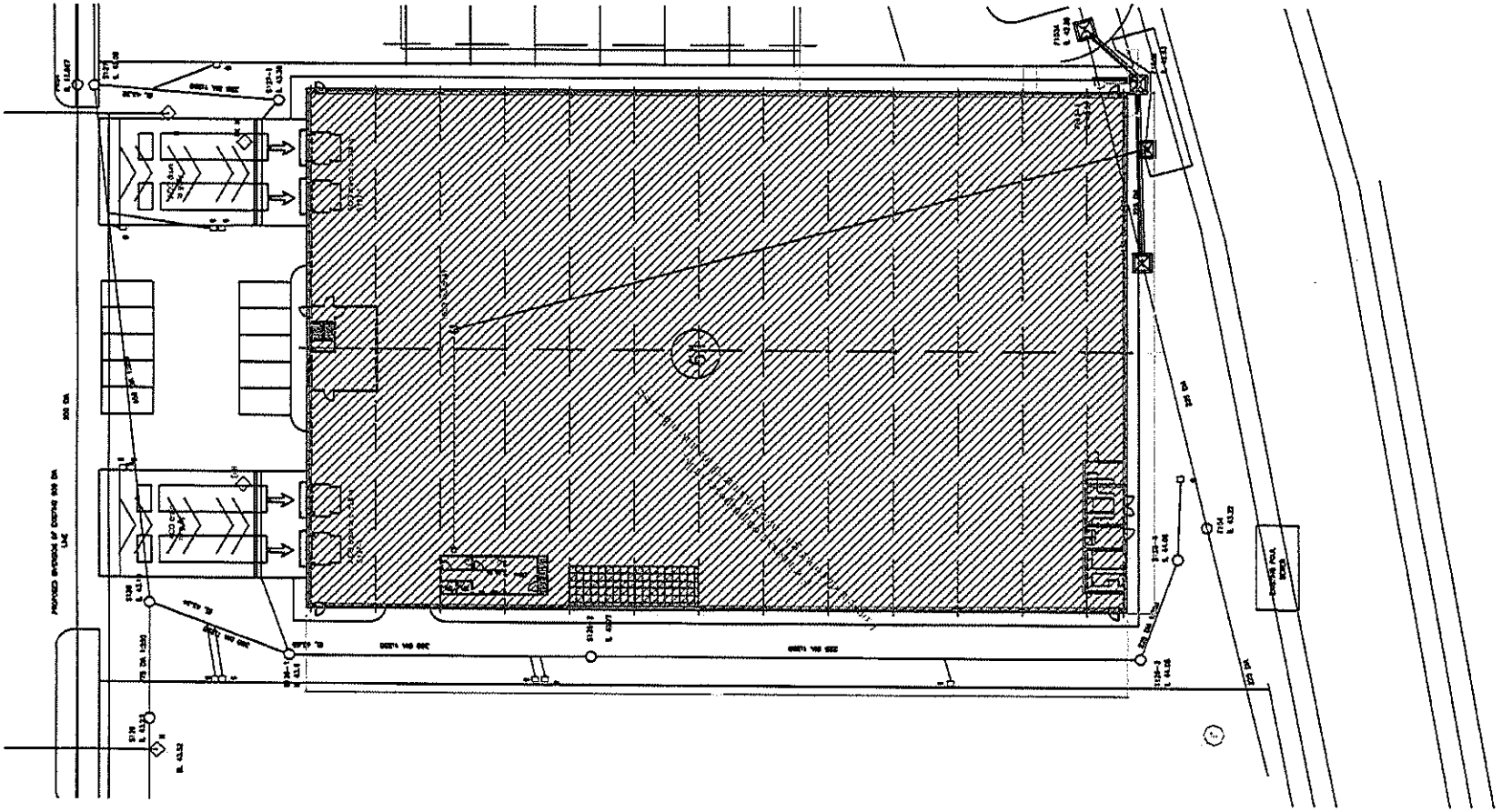
APPENDIX 2

Drawings



TechRec	Project Title: EPA Waste License Application	Drawing Title: Drawing 04: Site Infrastructure
		ERM





Applicant: TechRec

Project Title: EPA Waste License Application

Drawing Title: **Drawing 10: Buildings on Site**

ERM