SRCL Limited
Licence Register No. W0055-02

Annual Environmental Report 2010

March 2011

CONTENTS

Appendices

Appendix 1 EPA Audit report

Appendix 2 Noise Monitoring Report

Appendix 3 Company Insurances

Appendix 4 Management Structure

Appendix 5 Boiler Maintenance Report

Appendix 6 Data Logger Plots 2010

Appendix 7 Parametric Monitoring output Dec. 2010

Appendix 8 Residuals Management Plan/Financial Provision Assessment

1. Introduction

This report covers the period from the 1 January 2010 to 31 December 2010.

SRCL Ireland Limited is involved in the collection and treatment of clinical waste under Waste Licence no. W0055-02 issued on 24 January 2006 by the Environmental Protection Agency.

The waste management facilities at 420 and 430 Beech Road, Western Industrial Estate, Naas Road, Dublin 12 are authorised to carry out the following activities (Schedule A.1):

- Shredding of waste
- Sterilisation of waste
- Repackaging processes*
- Storage of waste
- Recovery of paper, plastics, textiles and metals from treated waste*

*full operation of a PVC separation plant started May 2010

Under Schedule A.2, handling of the following EWC codes and waste quantities is authorised:

Waste Type	EWC codes	Maximum Annual tonnage
Hazardous Waste for Treatment	180101-04 180201-03	15,000
Hazardous Waste for Transfer only	180102-03 180106-09 180202 180205-08	2,000
Non-hazardous waste	150102	1,000

2. Waste Quantities and Downtime

Amounts of waste received, processed and subsequently disposed of during 2010 were:

Quantity of Waste Treated **=** 8644 tonnes (2009: 8874 tonnes)
Quantity of Process Residues to Landfill **=** 6815 tonnes (2009:9560 tonnes)
Quantity of Process Residues to Lagan Cement as Low Carbon Fuel **=** 2601 tonnes (62 tonnes)

The difference (772 tonnes, 8.9%) is due to moisture (steam) added during treatment (2009: 747 tonnes, 8.4%)

Downtime (Defect Time) in 2010 was 248h (2009 375h).

3. Monitoring of Emissions
As follows.

4. Emissions to Sewer

All required reports have been submitted to the EPA and South Dublin CC as required. Non-compliant readings were notified to the EPA/County Council as required.

The licence requirement for analysis of Culturable Enteroviruses has been impossible to realise, due to the unavailability of a laboratory capable of the analysis. In the EPA Audit report, SRCL was instructed to complete the analysis or suggest an alternative solution.

A letter has been sent to the Sanitary Authority requesting guidance on this matter.

5. Emissions to Air

Bacterial and VOC samples taken in May and November 2010 by Glenside Environmental were within the Waste Licence bacterial and VOC emission limits.

6. Overall Emissions Compliance

Emissions compliance during 2010 was good. Only one Suspended Solids reading exceeded the ELV. The data is derived from the quarterly reports to the EPA.

7. Resources

Annual utilities usage and waste tonnage treated 2006 - 2010 was:

Year	Waste Treated (tonnes)	Water Used (m^3)	**Water (m^3/tonne treated)**	Gas Used (MWh)	**Gas (MWh/tonne treated)**	Power Used (MWh)	**Power (MWh/tonne treated)**
2010	8644	3852	**0.446**	1888	**0.218**	512	**0.059**
2009	8874	4982	**0.561**	2250	**0.254**	429	**0.048**
2008	8386	6132	**0.731**	2436	**0.290**	412	**0.049**
2007	7348	5633	**0.767**	2029	**0.276**	511	**0.070**
2006	6610	4863	**0.736**	2177	**0.329**	378	**0.057**

8. Water Usage)
9. Gas Usage) see table above
10. Electricity Usage)

Waste processed was down 2.6% on 2009, but processing temperatures were better controlled, resulting in a reduction of 22.7% in water consumption and 16.1% in gas, the main heat source, usage.

Electrical power usage shows no consistent relationship to tonnage. Investigation of electrical efficiency is listed as an Environmental Objective/Target for 2011 (see section 15.2 below).

11. Development

12. Development Works Completed 2010

- Upgrading of Air Extraction System on Process Line 2.
- Installation of PVC removal/bulk floc handling system and approval trials at Lagan Cement were completed during the year and substantial trial shipments made.
- The proposed opening of a Waste Transfer Station in 420 Beech Road did not take place. All Waste Transfer operations continued to be routed through the Ecosafe facility on the Allied Industrial Estate, Kylemore Road.

13. Development Works Scheduled for 2011

- Upgrading Process Line 1
- Installing a new drain for possibly contaminated yard water. This discharges into the foul sewer upstream of Sewer Sampling Point SE-1.
- Improvement of handling of PVC waste from the Redwave sorter
- Parametric monitoring to be extended to effluent pH and Temp
- Like-for-like changes to external air extraction ductwork
- Improving access to the RedWave gantry

14. Incidents and Complaints, External and Supplier Audits

14.1 Incidents and Complaints

Incidents are defined in Waste Licence W0055-2 (Glossary) as:

1. an emergency
2. any emission which does not comply with the requirements of the licence
3. any exceedence of the duty capacity of the waste handling equipment
4. any trigger level specified in the licence which is attained or exceeded
5. any indication that environmental pollution has, or may have, taken place.

14.1.1. ELV exceedances

There were three:

1. A grab sample of effluent taken by South Dublin CC on 4 February reported 1180 mg OFG/L (ELV 100 mg/L) . There was no obvious explanation of this exceedance. A routine monthly sample taken on 28 January reported 33 mg/L and another on 17 February, 65 mg/L.

2. Suspended Solids . On 2 June a monitoring sample taken by the EPA reported 1257 mg/L suspended solids. . At this time the RedWave PVC sorting line had just been commissioned (mid-May), some floc escaped and was hosed into the foul sewer.

3. Suspended Solids. In SRCL's July effluent sample was 820 mg/L. This was reported to the EPA. Following the fitting of drain covers and better control of floc, no further exceedances were found.

14.1.2 Spillages

A blockage in the Red Wave system during commissioning on 25 May resulted in treated waste held in a spillage net falling to the ground during clearance of the blockage. It was immediately cleared up and there were no environmental consequences. This was not regarded as a reportable incident.

A small leak in the Plant Oil Tank in 420 Beech Road, used as a biofuel by Mediclean Hygiene Services Ltd, was discovered on 14 October. The tank was immediately drained on discovery of the leak. It was removed and disposed of to a licenced waste operator shortly afterwards.

The minor oil spillage was treated with absorbent granules. They were disposed of in the same way. There was no risk of environmental pollution land the leak was not reported.

14.1.3 Indicator organisms.

1. One Spore Strip from Line 1 failed its external test on 27/7. Other spore strips put through at the same time passed the test. According to the spore strip test procedure (WI 6.3.3.1) the overall result was a pass and the event was not reported.

2. Small numbers of Faecal Streptococci (60 cfu/100gm) were detected in the October grab sample of treated waste. The was overlooked and not reported to the EPA. The cause was use of a sample container recycled without adequate cleaning. This practice has been discontinued and there have been no further failures since.

14.2 External Audits.

An audit of Waste Licence W0055-02 was completed by the EPA in November 2010. The audit report listed 4 non-conformances and 8 Observations. All these were addressed in the company's initial response in December 2010 and identified actions will be completed by end-Q2 2011. Appendix 1 is a copy of the Audit Report.

An audit of the Business Management System was completed by SGS in January 2010. There was one minor nonconformance.

14.3 Supplier Audits

Three supplier audits were completed in 2010. Copies of the Audit Reports are held on site as per EMS Procedure.

15. Environmental Objectives and Targets

15.1 Environmental Objectives and Targets 2009

15.1.1 Reducing the use of disposable packaging. Trials were made of recycling sharps containers. Procedures have been developed with rollout, subject to hospital acceptance, in 2011.

15.1. 2 UK H&S procedures have been revised to suit ROI conditions/legislative requirements and added to the Steripoint system.

15.1.3 H&S training is under continuing review/implementation.

15.2 Environmental Objectives and Targets 2010

	Objective/target	Actions required to achieve objective/target	Responsible person(s)	Target date	Date completed	Progress
Ob. 1	Improve Environmental Training	Complete Environmental Training Matrix, Beech Road & Eco-Safe	PC/RW	Q2 2011		Ongoing.
Ob. 2	Improve flexibility of Haz Waste Collection	New WCP to be obtained for SRCL incorporating all EWC codes. Interim maximising of existing codes and permitted expansion	PC/RW/JM/JMcH	Interim – end Q1 2011 Complete – end Q4 2011		Ongoing.
Ob. 3	Complete Bio-Track Matrix	Add GMM-GMO codes	PC/JM	End Q1 2011		Ongoing.
Ob.4	Ensure correct treatment of SRM waste (autoclaving at EcoSafe, then TFS/incineration)	Customer training re. form-filling	PC/RK	End Q1 2011		Ongoing.
Ob.5	Ensure Laboratory and other Plant Floor areas are routinely cleaned.	Schedule of regular cleaning of laboratory	PC/RW/JW	End Q1 2011		Ongoing.
Ob.6	Extension of Parametric Monitoring to effluent pH and Temp recording	Link sensors to plant floor PM server	JM/JW/RW/PC	End Q1 2011		Ongoing.
Ob. 7	Improve electrical energy efficiency	Monitoring of main electrical plant and identification of cost savings	JJ	Q2 2011		Ongoing

JJ/John Johnston; JM /Joe Mahon; J McH/James McHugh; JW/Joe White; PC/Peter Cazalet; RW/Ronan Walsh

16. Environmental Management Programme

The programmes in place to achieve the EMS Objectives and Targets are reviewed as part of the EMS Management Review Procedure. The management programmes in place to address the 2010 Objectives/Targets are:

Ob1. Due to staff changes, Environmental Training Matrix and implementation is behind schedule. Matrix to be completed early in Q2 and training by end Q4.

Ob 2. This has to be a two-stage process, since it includes applying for a new WCP for SRCL with all EWC codes. To immediately provide more flexibility, application to DCC has been made to add further codes to the EWC Chapters already on the SRCL WCP, and addition of the two further Chapters permitted without triggering a full reapplication.

Ob 3. Addition of GMM-GMO codes to the Biotrack Matrix is in hand, involving IT in UK and USA.The target is to have these codes in place by the end of Q2

Ob 4. Customer training is in place and should be completed by the end of Q2

Ob 5. In place. Laboratory and other side areas have been included in regular cleaning/maintenance schedules.

Ob 6. Effluent pH and Temperature sensors to be linked to vacant channels on the Parametric Monitoring server.

Ob 7. An investigation of the electricity usage of the main plant is planned for Q2 to try to identify cost savings. Depending on the results, changes may be introduced in the second half of 2011.

17. New Procedures

A Business Management System (BMS) was introduced in 2010 and is being rolled out. It includes the Environmental Management System. SGS audits the ISO 14001 Environmental Management System as part of the BMS.

18. Noise

The annual noise monitoring was completed at boundary points B1 (front of Unit 430), B2 (rear of Unit 430), B3 (front of Unit 420) and B4 (rear of Unit 420) on 10 March 2010 using calibrated sound measurement equipment.

Although readings exceeded the Guidance Limits for daytime and night-time noise levels of 55 and 45dB(A) respectively, they have been a feature of all noise surveys. The breaches are due to traffic noise on the N7 behind the site and not to waste treatment operations. As such they do not contravene condition 7.3 of the Waste Licence,.

The subcontractors report is available as Appendix 2.

19. Bund, Tank and Pipe Inspections

The self-bunded Plant Fuel Oil tank developed a leak and was emptied and removed. The event is reported under Incidents and Complaints (14.1) All chemicals such as bin-cleaning detergents, diesel and lubricating oil are kept on bunded-trays or in bunded cabinets. All these are scheduled for testing in 2011.

An independent inspection of underground drains was completed during 2008 and subsequent drainage repairs were conducted. A final Integrity Test report was completed during 2009; therefore further inspection will not be required until 2014.

20. Financial Provision, Management Structure and Public Information

21. Financial Provision

The Company is covered through Marsh Insurances for liabilities totalling €13m each for Employers Liability and Public Liability. Copies of Insurances are to be found in Appendix 3.

22. Management Structure

Appendix 4 shows the present Management Structure in the Irish Republic. This will simplify in 2011 as newly absorbed companies are completely assimilated

Details of the main environmental responsibilities are as follows:

General Manager Ireland

Ensures that the Beech Road plant is operated in compliance with the Environmental Licenses, Permits, Authorisations and Registration Documentation and all other environmental laws, regulations and requirements, including the Duty of Care. Ensures that all required data under the Environmental License, Permit, Authorisation, Registration or BMS is gathered and recorded in a timely and efficient manner.

Plant Manager, Beech Road

The Plant Manager is responsible for day to day plant floor operations.

Health & Safety Manager

Keeps abreast of all relevant legislation and other requirements to which the organisation subscribes and informs other Managers of changes to health & safety legislation and regulations that could impact on SRCL's operations and hence require changes to the BMS.

Generates and co-ordinates all health and safety activities, including COSHH and contingency planning for fires, accidents, spillages and other emergencies.

Reviews and responds to all Incident Reports.

Environmental Manager

The Environmental Manager is responsible for Environmental Compliance at SRCL. The Environmental Manager will be aware of and enforce legal and other requirements relating to Environmental Management and related topics.

Commercial Manager

The Commercial Manager is responsible for liaison with SRCL customers and service provision.
The Commercial Manager is responsible for external complaints & queries.
The Commercial Manager is responsible for dealing with customer declarations and contracts.

Individual Employees

Employees are required to co-operate with Management on health, safety and environmental issues and must bring any defects in plant, equipment or systems of work to the attention of their Supervisors or Manager without delay.

23. Public Information

Public information is displayed on the Site Notice Board according to condition 3.2.1 and 3.2.2 of the Waste Licence. Certain documents are available on site on request during normal office hours.

24. Boiler Efficiency Testing

Boiler testing was completed during 2009. This comprised inspection aand ultrasonic testing of welds in the main (gas-fired) boiler. The reserve (electric) boiler, was inspected but requires pressure testing before being brought into service. Report in Appendix 5.

25. Use of Quarantine Store

Unintentional submissions of waste are recorded. An 'Inappropriate Waste Report' is completed in each case and the customer contacted. There were a total of 78 cases reported for 2010 (2009:113). Inappropriate Waste is quarantined and either returned to source or sent to a waste transfer station for ultimate disposal. A valid C1 from the waste provider is required to cover the secondary waste movement.

26. Process Verification

The procedures for Process Verification (Efficacy) Testing are set out in Appendix C.4 of the Waste Licence.

They comprise:

- **Monthly random grab samples of processed waste**, analysed for Staphylococcus aureus, Enterococcus faecalis and Salmonella typhimurium.

  Results are reported quarterly to the EPA as Processed Waste Monitoring Reports

- **Challenge testing for spore forming organisms.** 6 Log_{10} spore strips of B. atrophaeus undergo the full process on each treatment line every day. There should be no growth subsequently.

Results are reported quarterly to the EPA as Processed Waste Monitoring Reports

- **Waste within treatment units.** Temperature and residence time are checked on each Treatment Line every month by data logger. During the year there was a problem replacing/repairing data loggers

  Results submitted in Appendix 6

  A spare data logger is now carried in case of loss.

- **Parametric monitoring.**

  Lower and Upper Clav temperature probes immersed in the waste stream record the waste temperature every 5 mins on each line while processing is in progress and write it to computer files. Auger rotation speed (measured as Hz) is also recorded. The auger power cuts out when the Lower Clav temperature drops below 91°C.

  Full parametric monitoring has been in place since 2009 but recording the information has been problematic due to problems with links to the main server. In 2010 a dedicated server was installed on the plant floor and data drop out is no longer a problem.

  Results are saved as monthly files, available on site. An example of a days output from Line 2 is given in Appendix 7.

Steam jacket temperatures and pressures are not monitored since *waste temperature* is the critical parameter.

- **Biological inactivation tests**

  There is also a schedule of far more extensive annual tests, but it has so far been impossible to source laboratories that can handle all or even most of them.

  The Licence Review Application has again requested a decision about this from the EPA. No decision has been received to date.

27. Residuals Management Plan/ Environmental Liability Risk Assessment

The triennial review specified in the Waste Licence (previous review 2008) is set out in Appendix 8, which also includes ELRA information.

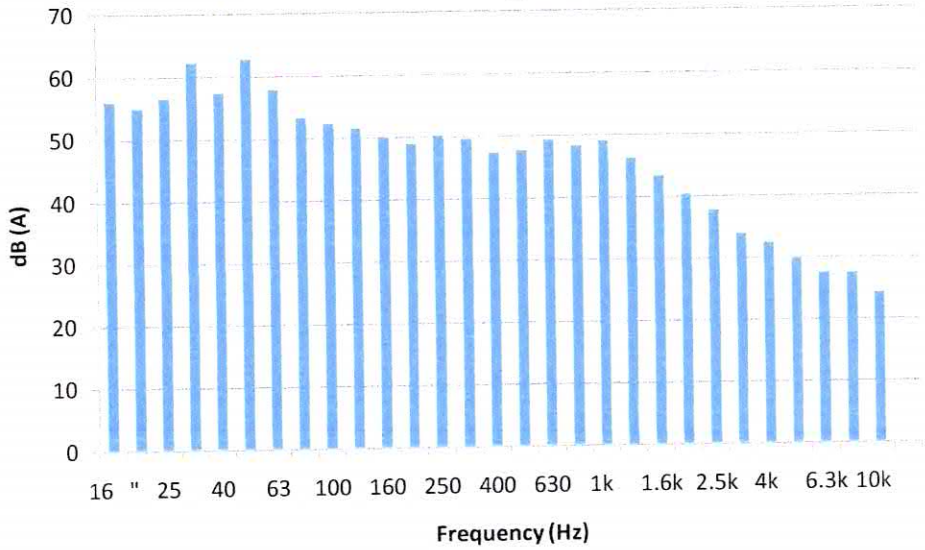
28. Measures to Prevent Environmental Damage

SRCL operates an Environmental Management System accredited to the ISO14001 standard during 2007 and routinely audited by SGS Ireland. This system ensures compliance with environmental regulations and promotes good environmental practices while aiming for continual improvement.

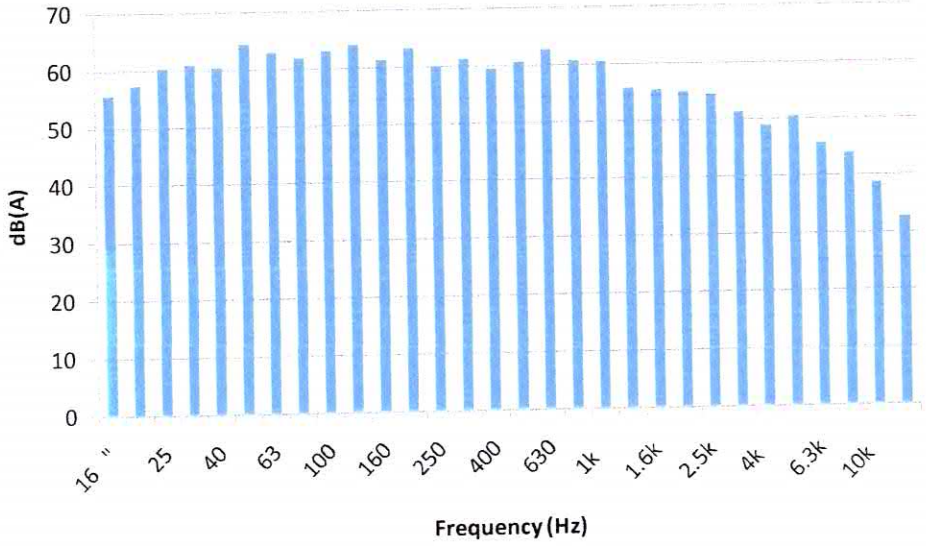
APPENDIX I

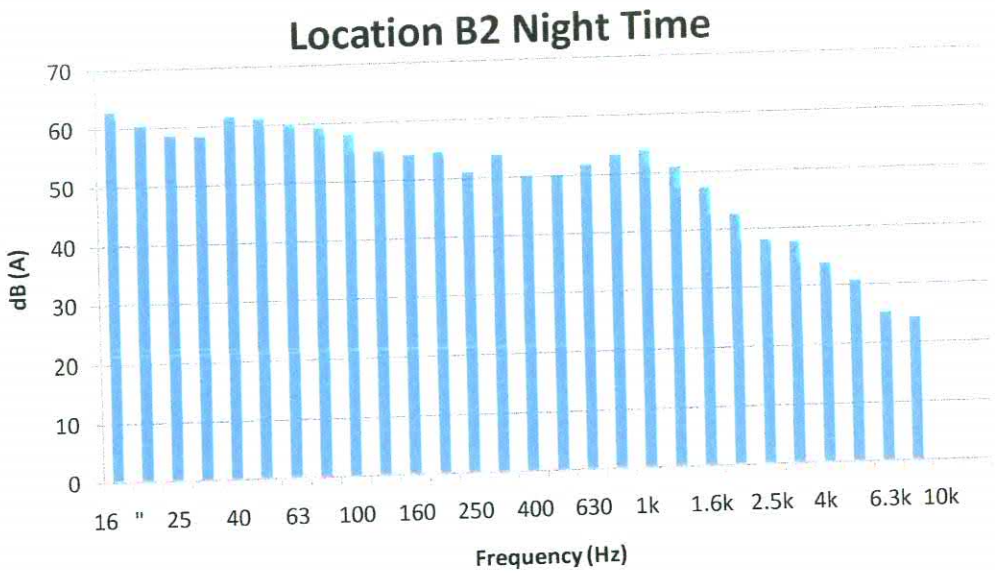
1/3 OCTAVE FREQUENCY SPECTRA

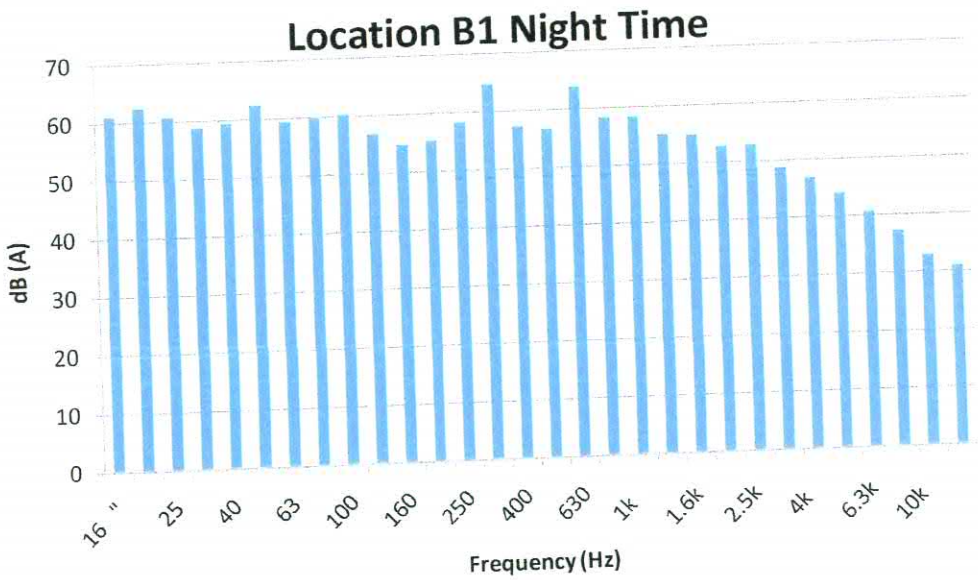
Location B3 Night Time



Location B4 Night Time




Location B2 Night Time
70
60
50
40
30
20
10
0
dB (A)
16
"
25
40
63
100
160
250
400
630
1k
1.6k
2.5k
4k
6.3k
10k
Frequency (Hz)


Location B1 Night Time
70
60
50
40
30
20
10
0
dB (A)
16
"
25
40
63
100
160
250
400
630
1k
1.6k
2.5k
4k
6.3k
10k
Frequency (Hz)

APPENDIX II

CERTIFICATE OF CALIBRATION

Measurement Systems

CERTIFICATE OF CALIBRATION

Certificate Number	CAL060927
Date of Issue	17/06/2009
Customer	Glenside Environmental Services
	Description of Instrument
Sound Level Meter	Rion NL-32 Sound Level Analyser [Serial No. 01161964] with Rion UC-53A Microphone [Serial No.311080] and Rion NH-21 Preamplifier [Serial No.21998] Fitted with a WS-10 foam windshield. The instrument successfully completed the Class 1 Periodic Tests of BS EN 61672.
Associated Calibrator	B & K 4226 S/N 2590976.
Date of Calibration	17/06/2009.
Test Procedure	...\...\Calibration Results Sheets\Current Approved Results Sheets\NL-31 Master 61672-3 Approved Issue 6 (BK 2590976).xls Test procedures in accordance with BS EN 61672-3:2006 NOTE: Test 10.1 (Self Generated Noise with Microphone Installed) omitted
Test Engineer	Amrat Pate

APPROVED SIGNATORY .....
Les Jephson C / Mike Breslin

BEAUFORT COURT, 17 ROEBUCK WAY, MILTON KEYNES, MK5 8HL
☎ 01908 642846 🖷 01908 642814
✉ info@noise-and-vibration.co.uk 🖳 www.noise-and-vibration.co.uk

APPENDIX 3

(ii) Products Liability- €15,500,000 any one occurrence any one period of insurance

Republic of Ireland and elsewhere in the world.

Employers Liability

Chartis Insurance Ireland Limited

EML40370

08 November 2010 to 07 November 2011

€13,000,000 any one occurrence and unlimited in the period of insurance.

Anywhere in or temporarily outside the Republic of Ireland, Northern Ireland, Great Britain, the Isle of Man or the Channel Islands.

ıces which are the subject of this letter after consultation with you
ons only.

We express no view and we cannot and do not guarantee the solvency or continuing solvency of any insurers used.

This letter is issued as a matter of information only and confers no right upon you other than those provided by the policies. This letter does not amend, extend or alter the coverage afforded by the policies described herein. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this letter may be issued or pertain, the insurance afforded by the policies described herein is subject to all terms, conditions, limitations, exclusions and cancellation provisions and may also be subject to warranties. Limits shown may have been reduced by paid claims.

This letter shall be governed by and shall be construed in accordance with Irish law.

Yours faithfully

James A Ward
Senior Vice President

APPENDIX 5

HSB Haughton

Cairo House, Greenacres Road
Waterhead, Oldham
Lancashire OL4 3JA

t: 0845 345 5510
f: 0845 345 5610
w: www.hsbeil.com

Our Ref.: HBD83577/1/DH2/SK1/LJH

Date: 9th December 2009

SRCL LIMITED
430 Beech Road
Western Industrial Estate
Naas Road
Dublin 12
County Dublin
Republic of Ireland

For the attention of Sam McArdle

Inspection Details

Type	:	Contract
Number	:	HBD83577-1 Report Nos. : 001-007
Class	:	Lifting & Handling and Boiler/Pressure Plant
Surveyor	:	Mr D.D Harrington
Date	:	6th December 2009
Location	:	As above

Dear Sirs

Our Engineer Surveyor attended as above in order to carry out the examination detailed.

We enclose for your files the requisite examination report, for you to retain for perusal, if required, by the Health and Safety Executive, detailing our remarks for your attention. Observations and comments made in our reports are for your own consideration as to the extent of repair or other maintenance work which you intend to undertake. The company has no liability for instructions to undertake work on any item other than those which require action within a defined period under the requirements of the relevant Statutory Act to which the examination contract refers.

In accordance with our accreditation procedures, you may reproduce the attached report in whole, or in part for use by yourselves or a third party. The examination methods and procedures used to comply with the detailed particular Statutory Regulations, which are applicable to the Plant, are stated in the method statements documented in Section 13.5 of the Company Quality Procedures.

We should like to thank you for the courtesy extended by your staff to us during the examination, and trust that you find our services to your satisfaction.

Yours faithfully

COPY

B.L. Andrew
Chief Engineer
Per

HSB Haughton

REPORT OF NON-INSPECTED ITEMS

Policy: HBD083577

Site : 00001

Previous Report: 121108-003-0005SB2

Report Number : 091209-002-0006SK1 **RONI1**

Occupier SRCL LIMITED

Address 430 Beech Road, Western Industrial Estate
Naas Road, Dublin 12
County Dublin, Rep.Ireland

Sched No.	Plant Code	Item	Remarks
B0003	B24A11	Steam Boiler (Electric) S.No.:1098-54818 Reimers	The boiler was out of service at the examination. Before it is taken into service again a Thorough Examination should be carried out. Please advise when available for statutory examination.

COPY

We hereby advise that the above items of equipment have not recently been examined or inspected, and the status of previous certification or examination/inspection reports should be determined prior to returning the items to service.

Date: 06 Dec 2009

Date of Last Examination: 08 Sep 2006

Inspecting Engineer: Mr D.D Harrington

Qualification: Engineer Surveyor

Signature: D.D. Harrington

TO BE INSERTED IN THE GENERAL REGISTER

HSB Haughton Engineering Insurance Services Limited
Registered office: Cairo House Greenacres Road Waterhead Oldham Lancashire OL4 3JA
t: 0845 345 5510 f: 0845 345 5610 w: www.hsbeil.com
Registered in England and Wales 03010292. Registered as a branch in Ireland 906105

UKAS INSPECTION 010

SAFed

CEOC INTERNATIONAL

HSB Haughton

FACTORIES ACT, 1955, Section 40 - Safety in Industry Act 1980, Section 31
Prescribed Form for REPORT OF EXAMINATION OF STEAM BOILER WHEN COLD
For report of examination under normal steam pressure see Form F.I. 1040. For Economisers see Forms F.I. 1041 and F.I. 1040. For Superheaters see Form F.I. 1042 and F.I. 1040
For Steam tube ovens and steam tube hotplates see Form F.I. 1046

Policy: HBD083577 Plant Code: B24A11 Previous Report: 121108-001-0005SB2

Site: 00001 Schedule: B0002 Report Number: 091209-004-0006SK1 FI1039

Name of Occupier of Factory	SRCL LIMITED
Address of (a) factory (b) Head Office of Occupier NOTE - Address (b) is required only in the case of a boiler used in a temporary location, e.g. on a building operation, work of engineering construction.	430 Beech Road, Western Industrial Estate Naas Road, Dublin 12 County Dublin, Rep.Ireland ---
Description, distinctive number and type of boiler	Steam Boiler Serial No.:- 23/3806 Cochran Wee Chieftain
Date of Construction The history should be briefly given, and the examiner should state whether he has seen the last previous report.	2004 See section 5 Last previous seen
Date of last hydraulic test (if any), and pressure applied	2004. 1.65 N/mm2
Quality and source of feed water.	Good, mains treated
Is the boiler in the open or otherwise exposed to the weather or to damp?	No
1. Boiler. (a) What parts of seams, drums or headers are covered by brickwork?	None
(b) Date of last exposure of such parts for purpose of examination.	Unknown
(c) What parts (if any) other than parts covered by brickwork and mentioned above were inaccessible?	Externally underneath the cladding and the contracted parts internally.
(d) What examination and tests were made? (if there was any removal of brickwork, particulars should be given here).	Thorough external and internal as accessible. With ultrasonic examination on the circumferential longitudimal weld seems.
(e) Condition of boiler. (State any defects materially affecting the maximum permissible working pressure). External	In order where seen
Internal	In order where seen
2. Fittings and Attachments. (a) Are there proper fittings and attachments?	Yes
(b) Are all fittings and attachments in satisfactory condition (so far as ascertainable when not under pressure)?	See section 5
(c) For boilers operating without continuous personal supervision, specify each extra fitting and attachment on the boiler for securing safe working.	Automatic water level devices and automatic firing devices.
3. Repairs. Repairs (if any) required and the date after which the boiler must not be used if the repairs specified have not been executed and any other conditions which the competent person making the examination considers it necessary to specify for securing safe working.	None

4. Maximum permissible working pressure, calculated from dimensions and from the thickness and other data ascertained by the present examination, due allowance being made for conditions of working if unusual or exceptionally severe.	1.1 N/mm2
Where repairs affecting the working pressure are required, state the maximum permissible working pressure: (a) Before the expiration of the date specified in (3).	(a) ---
(b) After the expiration of such date if the required repairs have not been completed.	(b) ---
(c) After the completion of the required repairs.	(c) ---

5. Other Observation See Plant Report Continuation

+ Subject to the reservation (noted above) of certain points for examination under steam pressure, I certify that on the date of examination the boiler above described was sufficiently, scaled, prepared, and (so far as its construction permits) made accessible for thorough examination and for such tests as were necessary for thorough examination, and that on the said date I thoroughly examined this boiler, including its fittings and attachments, and that the above is a true report of the result. (+ Delete if required)

Date of Examination: 06 Dec 2009

Date of Last Examination: 09 Nov 2008

Inspecting Engineer: Mr. D.D. Harrington

Date of Next Examination: 06 Feb 2011

Signature: D.Harrington

Counter Signature:

Qualification: Engineer Surveyor

Date: 19 Feb 2010

TO BE INSERTED IN THE GENERAL REGISTER

HSB Haughton Engineering Insurance Services Limited
Registered office: Cairo House Greenacres Road Waterhead Oldham Lancashire OL4 3JA
t: 0845 345 5510 f: 0845 345 5610 w: www.hsbeil.com
Registered in England and Wales 03010292. Registered as a branch in Ireland 906105

UKAS INSPECTION 010

SAFed

CEOC INTERNATIONAL

PLANT REPORT CONTINUATION

HSB Haughton

Policy: HBD083577 **Plant Code:** B24A11 **Previous Report:** ---

Site : 00001 **Schedule:** B0002 **Report Number :** 091209-004-0006SK1 PRC1

Occupier SRCL LIMITED

Address 430 Beech Road, Western Industrial Estate
Naas Road, Dublin 12
County Dublin, Rep.Ireland

Section	Remarks
5	2(b) - Subject to a further report after examination under normal steam pressure. History - Good so far as known. An ultrasonic examination was carried out on the circumferential and longitudinal weld seams in accordance with SAFed Guidelines in 2009. The result of the ultrasonic examination was satisfactory.

COPY

Date of Examination: 06 Dec 2009

Inspecting Engineer: Mr D.D Harrington

Signature: D.D. Harrington

Date of Last Examination: 09 Nov 2008

Date of Next Examination: 06 Feb 2011

Qualification: Engineer Surveyor

HSB Haughton Engineering Insurance Services Limited
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UKAS INSPECTION 010

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CEOC INTERNATIONAL

APPENDIX 6

APPENDIX 6 Line 1

Report

Winlog.pro

26/01/2010

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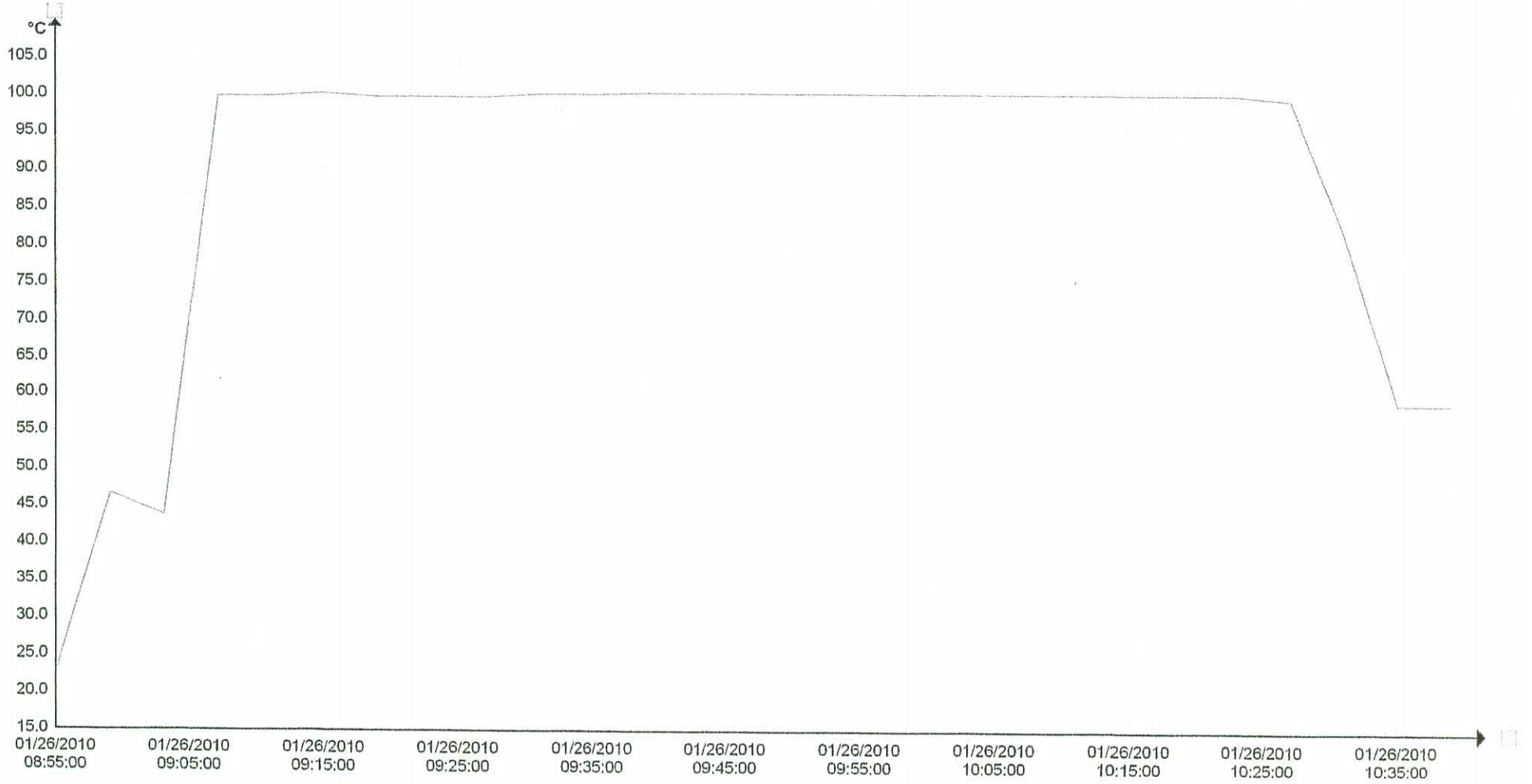

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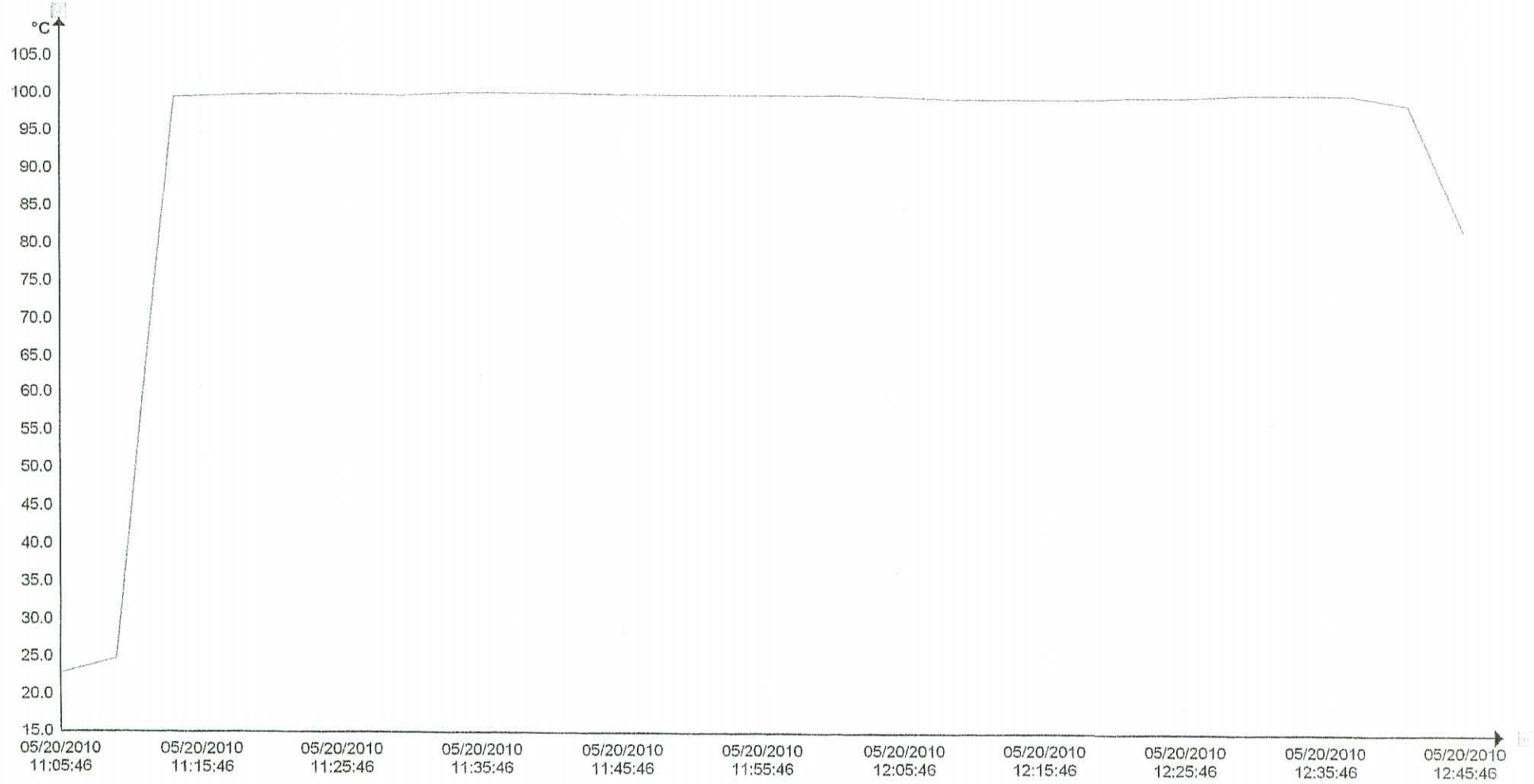

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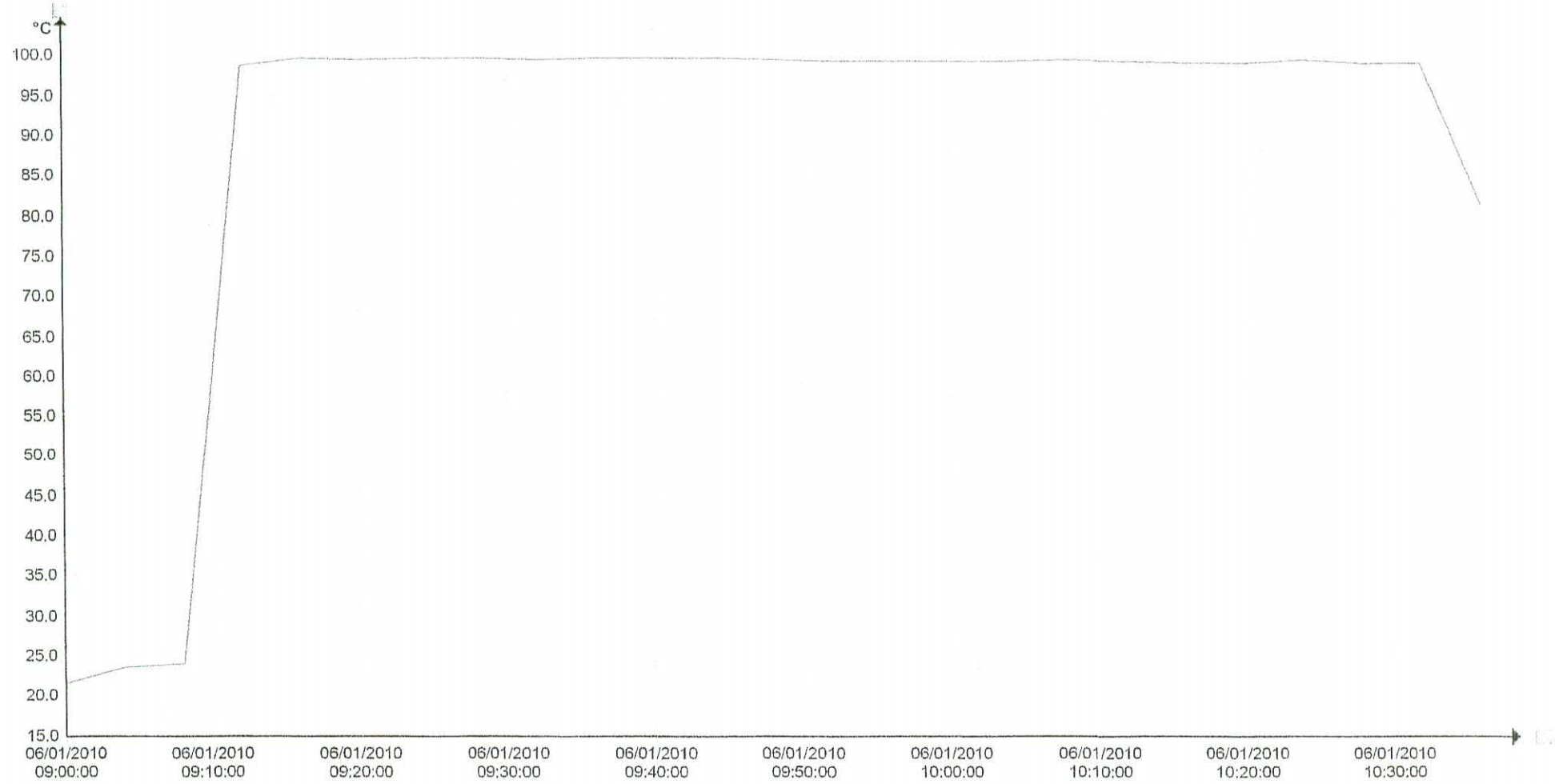

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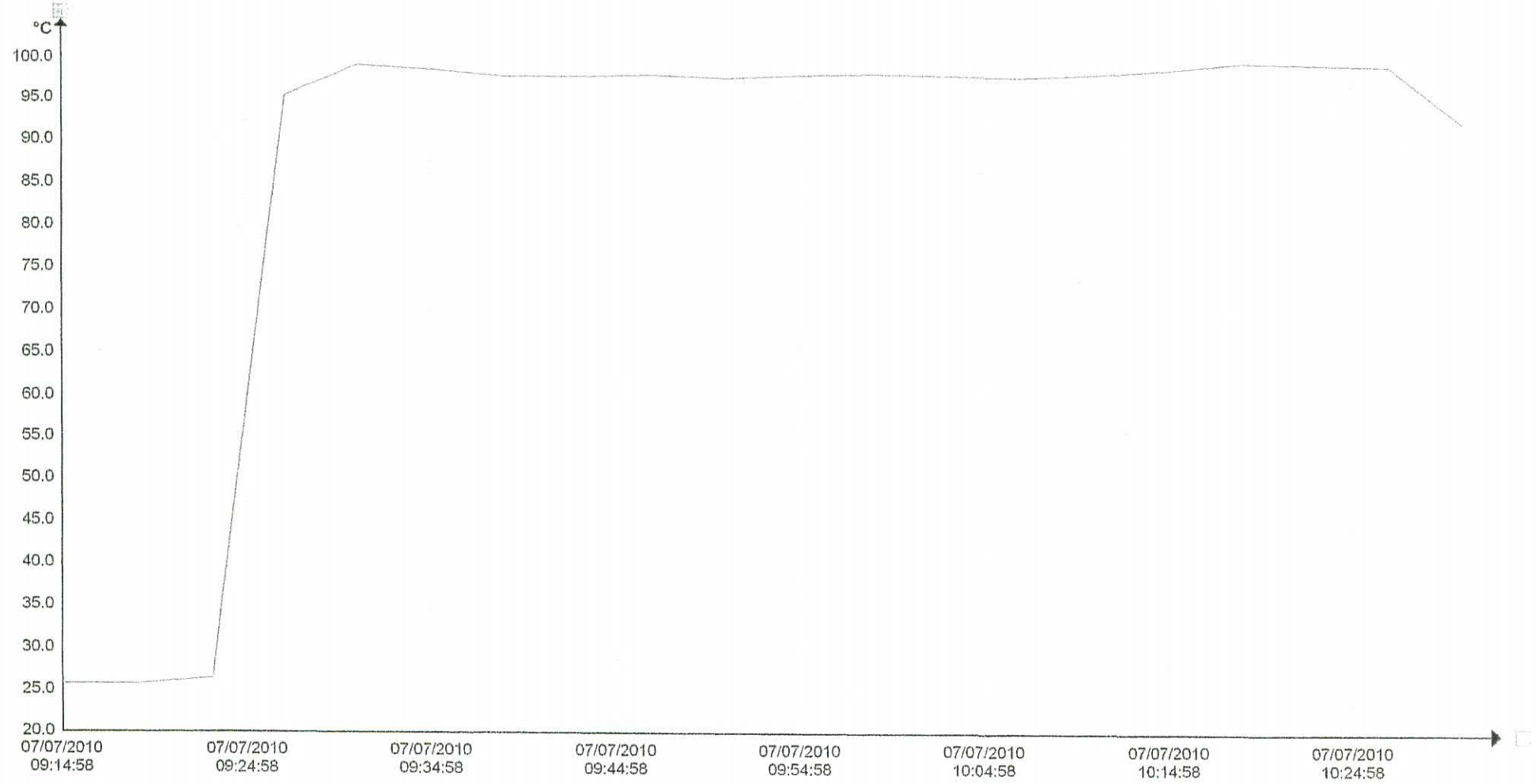

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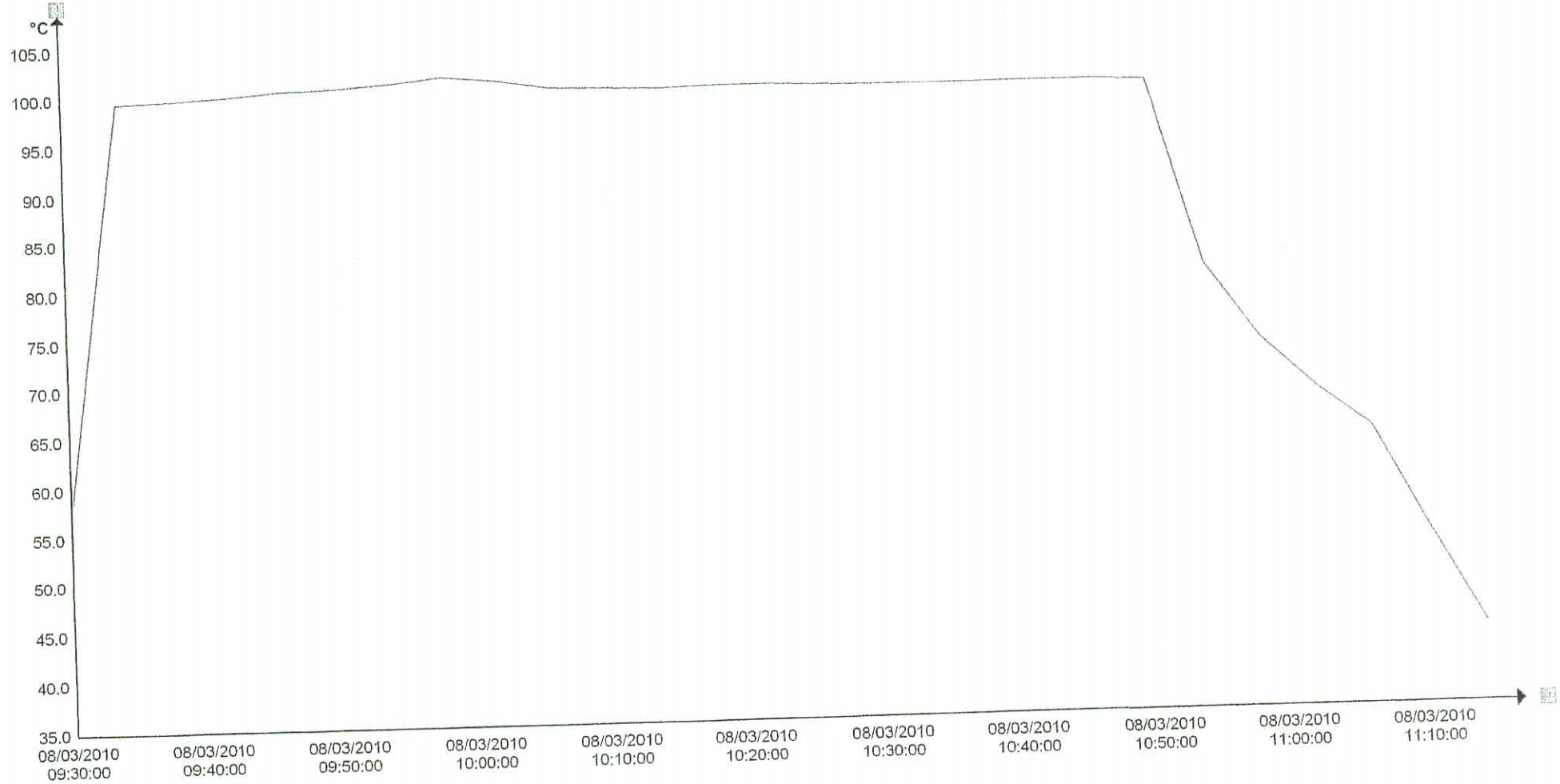

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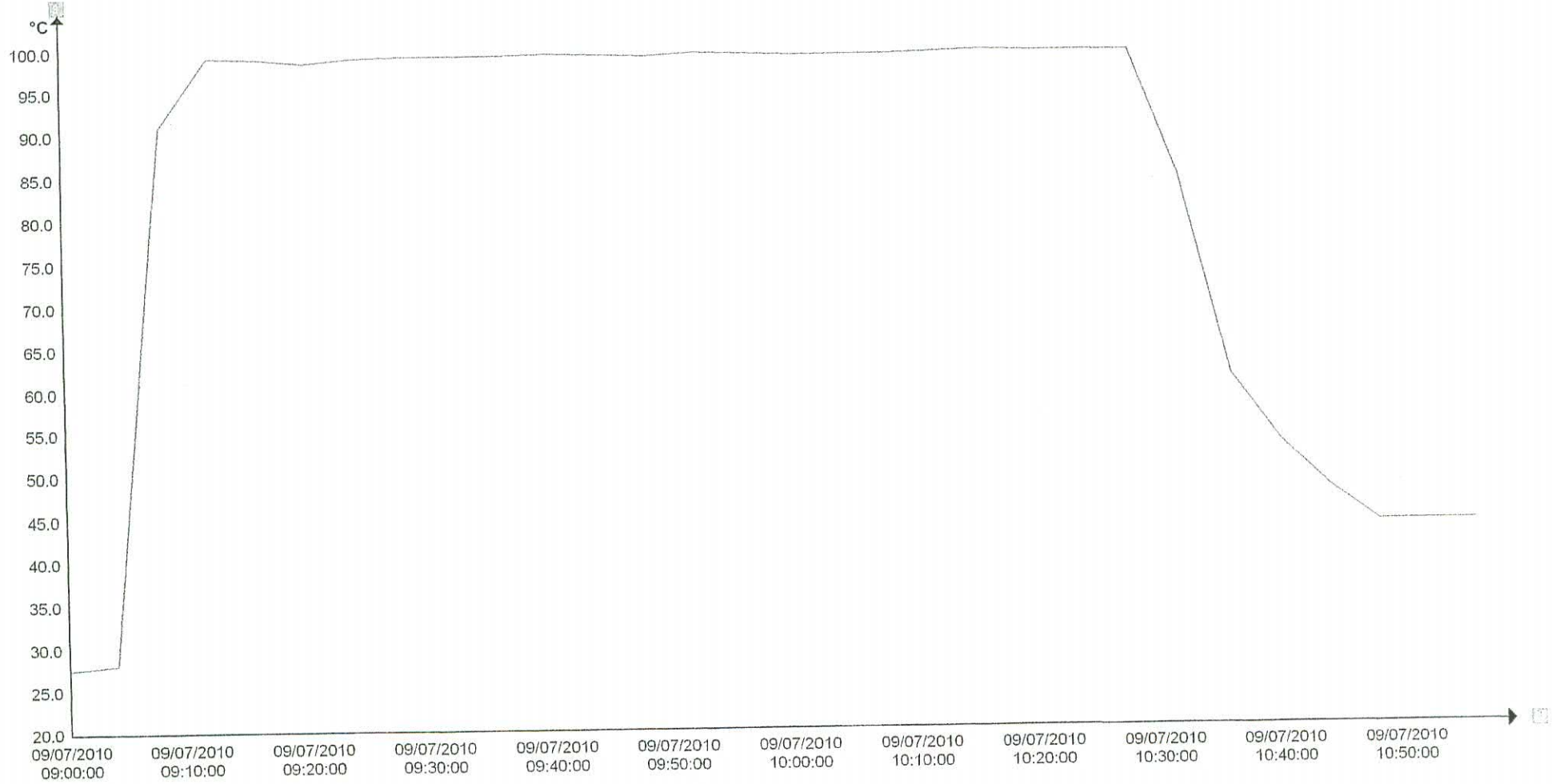

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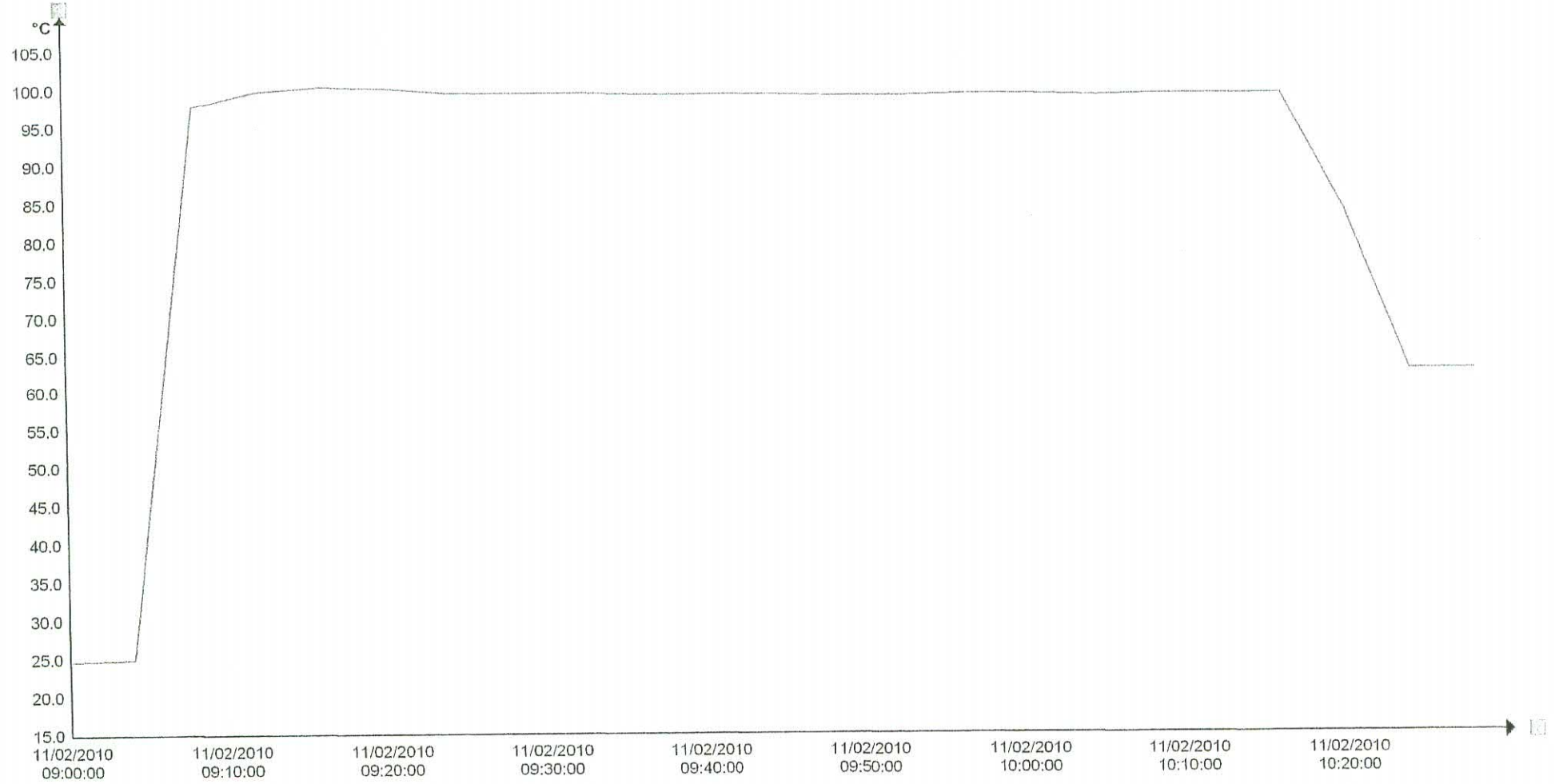

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Report

Winlog.pro

06/12/2010

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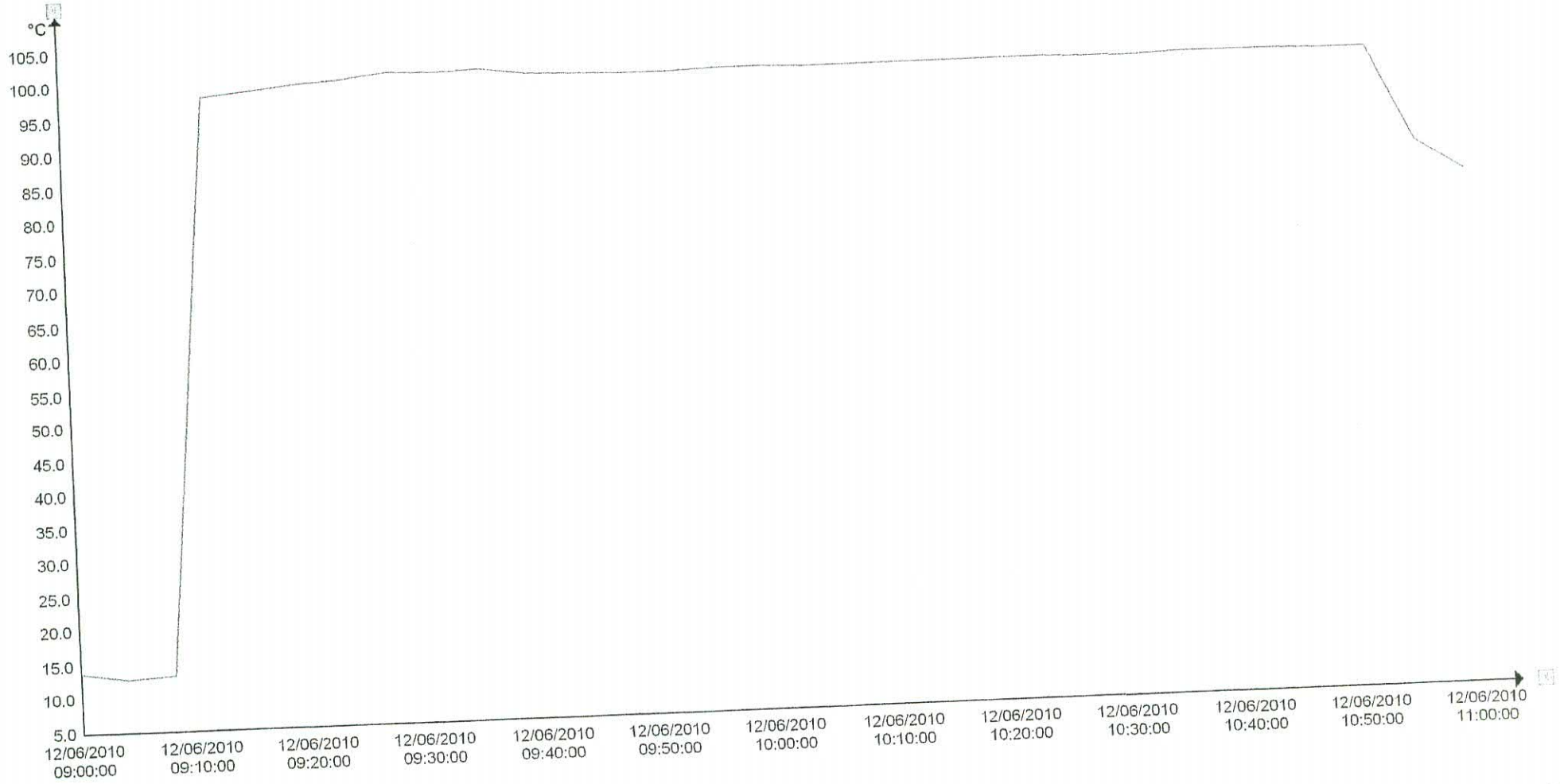

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APPENDIX 6 Line 2

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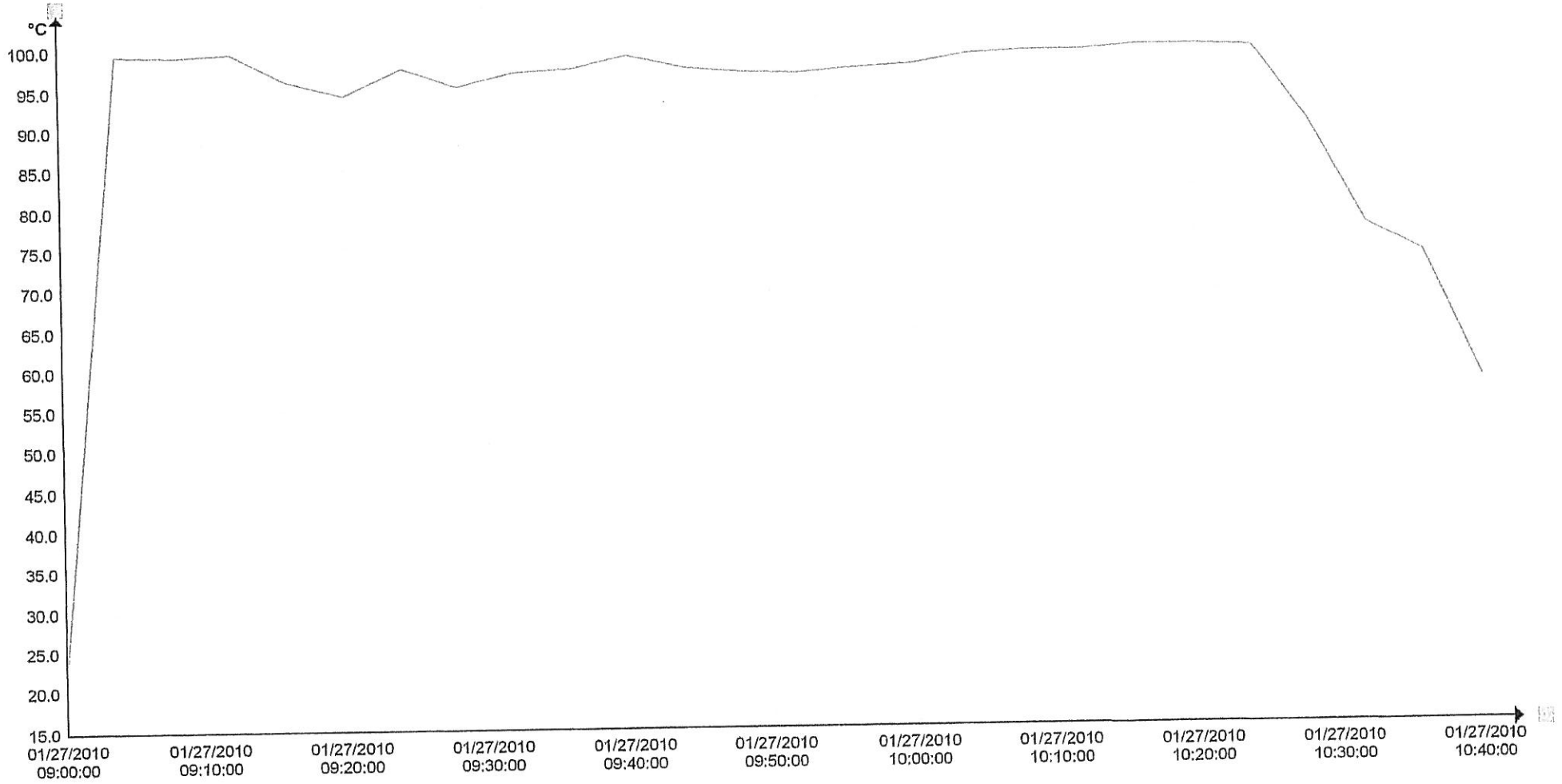

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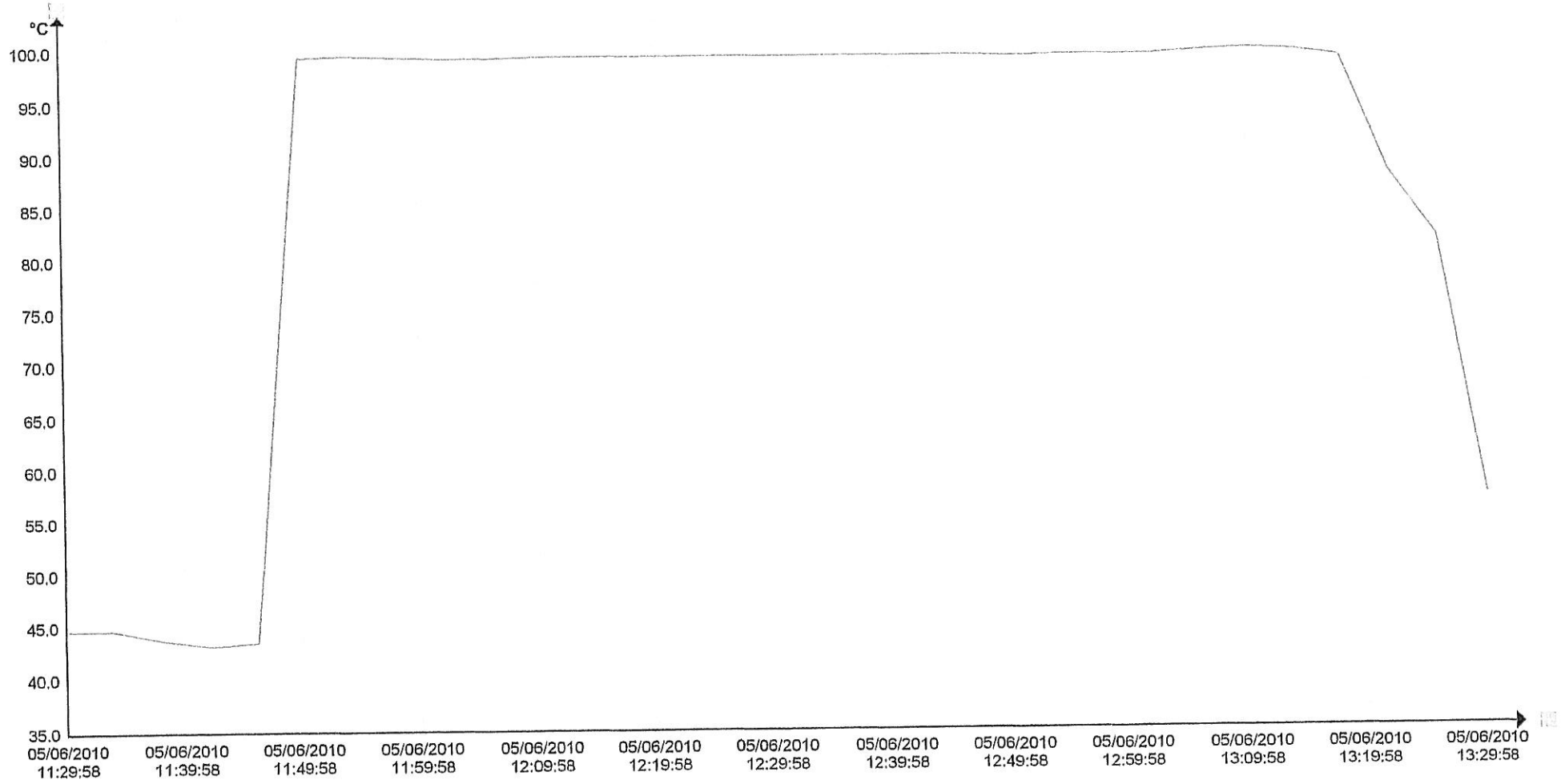

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(2)

Report

Winlog.pro

04/08/2010

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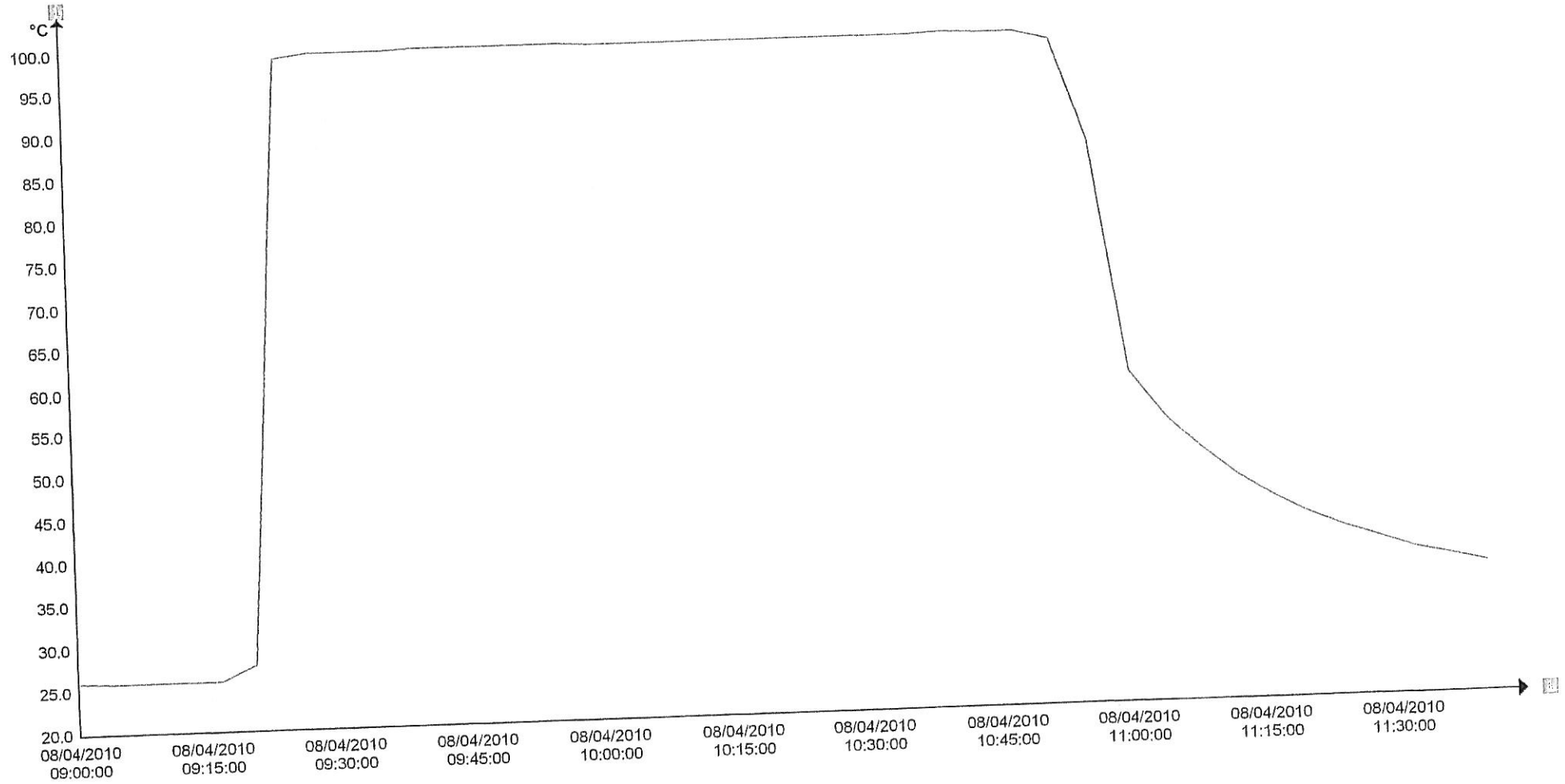

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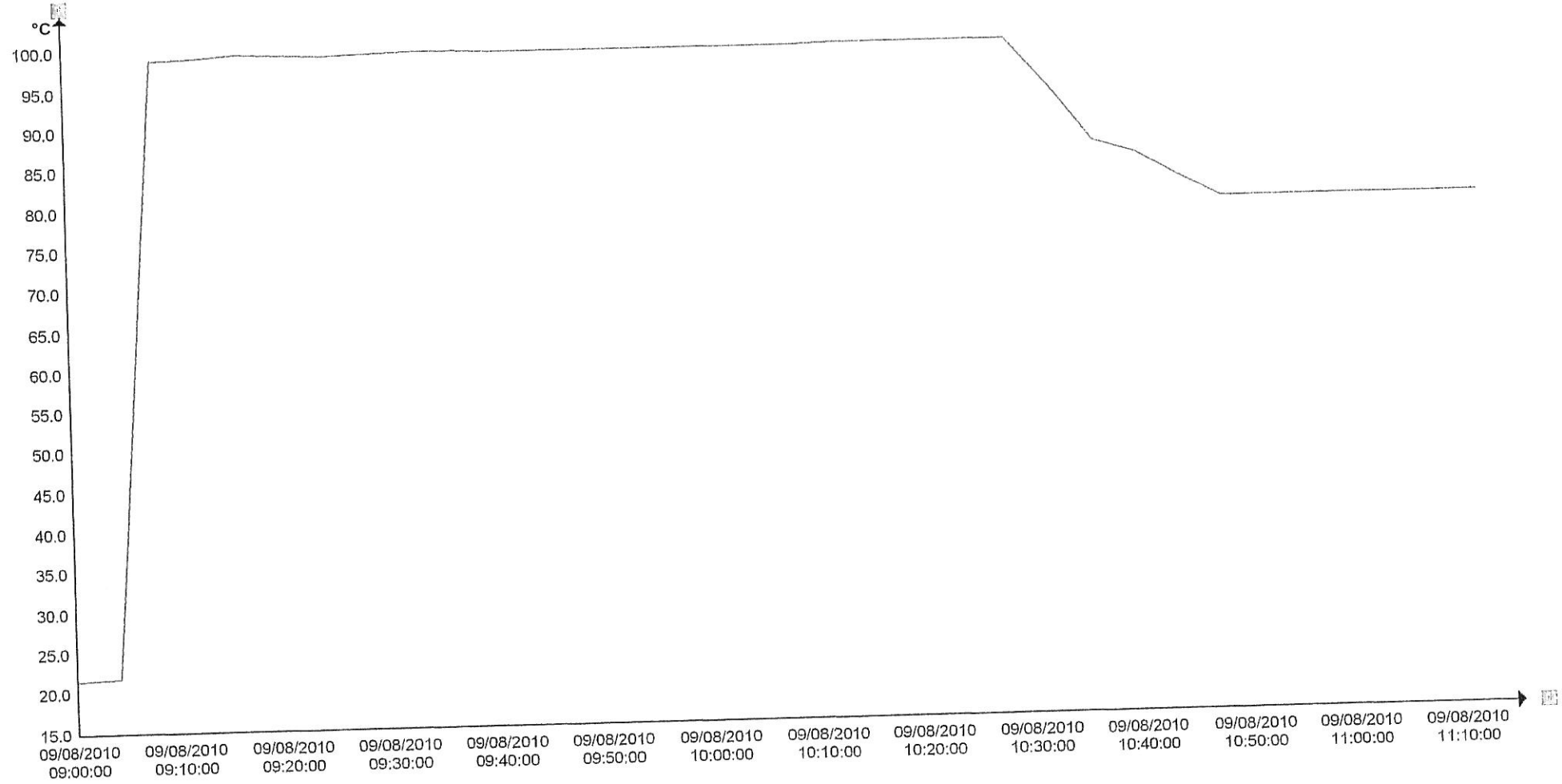

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Report

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03/11/2010

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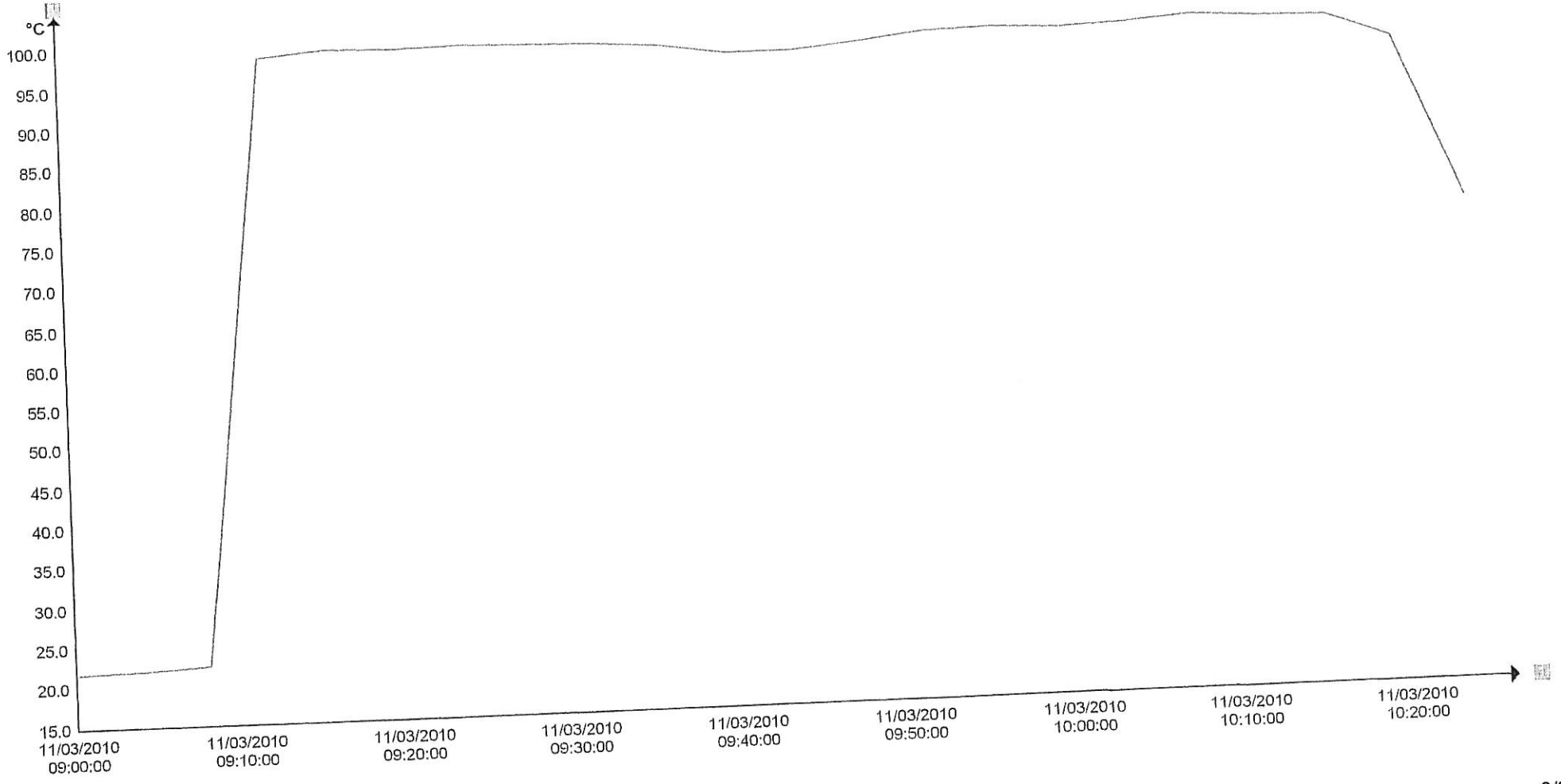

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APPENDIX 7

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APPENDIX 8

SRCL Ireland - Clinical Waste Treatment Plant:

SITE CLOSURE PLAN 2011

1. Site activities

The following activities have been undertaken on the site since the issue of the Waste Licence:

- Delivery of clinical waste
- Storage of clinical waste prior to treatment
- The Treatment of wastes via treatment plant (STI MODEL 2000 x 2)

The following associated activities have also been undertaken on the site:

- Washing of clinical waste carts
- Maintenance
- Storage of process residues pending disposal off site

The activities are described in detailed below.

Temporary storage of clinical waste

There is virtually no storage of untreated clinical waste on site. Small amounts may be present onsite for short periods while awaiting treatment. This is in UN-approved clinical waste collection carts within the building or on waste collection vehicles outside.

Washing of clinical waste carts

Empty clinical waste carts are washed in the bin washing area within the treatment plant building using an automated bin-wash system.

Maintenance of the Treatment Plant

All maintenance is completed within the building. Maintenance activities included replacement of mechanical parts, filters, and oiling and greasing moving parts. Maintenance of the waste carts is also carried out inside the building. Small quantities of oils and lubricants required for maintenance purposes are stored on site.

Storage of process residues

Process residues (treated clinical waste) are stored in 40cu yd Ro-Ro skips or in up to two moving-floor covered trailers in the yard.

Maintenance of Treatment Plant	Clinical waste Infectious pathogens Treated clinical waste Oils and Lubricants	Contamination of Treatment Plant	The treatment plant is regularly cleaned and maintained in accordance with the manufacturer's instructions. Any clinical waste or removed during maintenance is recovered and processed.	Possible
		Contamination of area around Treatment Plant	Procedures are in place to recover any clinical waste spilled and treat affected areas with appropriate disinfectants. Procedures are also in place to recover spilled oils or lubricants with absorbent material and dispose of it to appropriately licensed facilities.	Possible
		Contamination of maintenance equipment / tools	All tools used for the maintenance of the Treatment Plant are thoroughly cleaned and disinfected after use.	Negligible
Storage of Treatment residues	Treatment Plant residues	Contamination of area around process residue skips	Floc skip storage areas are regularly inspected and any spilled material is collected. Spillages within the building are regularly cleared.	Expected
Storage of Treatment residues	Treatment Plant residues	Site drainage system	All residues within the building are managed by bunding and kept and away from surface water drains.	Negligible

Treatment Plant and associated units

The Treatment Plant and all associated plant and machinery will remain within the Treatment Plant building until an appropriate decommissioning proposal is agreed by all parties and the EPA.

3: Site surface cleaning

The following steps will be taken to remove any contamination present on surfaces to ensure that there are no potentially infectious pathogens remaining:

The floor of the building will be swept to remove any loose debris. Additionally the hard standing around the compactor will be swept to gather up any remaining treatment residues. The material will be collected and put in rigid one way containers or clinical waste sacks and sent to a suitably licensed facility for disposal.

A mechanical floor cleaner will then be used to clean and scrub the floor inside the building. A special floor cleaner which has disinfectant properties will be used.

The floor inside the building will be pressure washed. Contaminated water arising during this stage of the cleaning process will be discharged to foul sewer.

The cleaning of the yard area will follow the same process.

4: Site drainage system clearance

The following steps will be taken to decontaminate the drains onsite:

- All debris will be removed from mesh grills over any drains and from the drains themselves;
- The drains will be visually inspected and all debris present removed;
- The grills will then be put back while the floor is being washed;
- The mesh grill will be removed again and cleaned of any new accumulated debris.
- At the same time the section of the drain immediately below the grill will again inspected and all debris present removed;
- The cleaning process of grills and drains will then be repeated;
- All debris will be removed from external drains;
- Finally; the site Interceptor will be de-sludged and the sludge disposed of appropriately.

5: Sites intended future use

This is unknown at this time.

6: Costing of Environmental Liabilities

Environmental liabilities associated with the planned / unplanned cessation of activities / decommissioning of the site comprise:

- The safe removal of the waste remaining on site following an emergency event (e.g. fire) or
- Decommissioning and closure of the site.

Untreated Waste Removal / Disposal

The maximum amount of unprocessed waste in the facility at any on time is approximately 300 bins. Each bin holds approximately 50kg (average). The estimated waste quantity to be removed for treatment off site is 15 tonnes.

The estimated total cost for waste removal and disposal is therefore: **€11,250**

Treated Waste Removal / Disposal

Allowing for 2 skips and 1 walking floor trailer of process residues on site, a maximum of 48 tonnes would need to be transported elsewhere. The cost to send a skip of processed material to landfill is approximately €122 per tonne. There are 2 skips in total; each capable of holding a maximum of 14 tonnes. There is one tailer capable of holding 20 tonnes.
The estimated total cost for waste removal and disposal to landfill is therefore: **€5,856**

Decommissioning of Treatment Plant / Associated Plant and Equipment

Before decommissioning is complete, the Treatment Plant and associated equipment will need to be cleaned.

The estimated total cost for this work is;	
300 man hours @ €30 per hour	**€9,000**
Materials	**€1,200**
Estimate Total Costs for Site Closure	**€27,306**

SRCL is covered by *Employers and Public/Product Liability* Insurance. This policy covers SRCL's the legal liability for injury to persons or damage to property arising from its business activities.

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	SRCL Limited
Facility Name	SRCL Limited
PRTR Identification Number	W0055
Licence Number	W0055-02

Waste or IPPC Classes of Activity

No.	class_name
3.7	##
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
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.
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
4.9	Use of any waste principally as a fuel or other means to generate energy.
Address 1	420-430 Beech Road
Address 2	Western Industrial Estate
Address 3	Naas Road
Address 4	Dublin 12
Country	Ireland
Coordinates of Location	-6.3626 53.3218
River Basin District	IEEA
NACE Code	3821
Main Economic Activity	Treatment and disposal of non-hazardous waste
AER Returns Contact Name	Ronan Walsh
AER Returns Contact Email Address	rowalsh@srcl.com
AER Returns Contact Position	Health and Safety Manager
AER Returns Contact Telephone Number	01-4565796
AER Returns Contact Mobile Phone Number	
AER Returns Contact Fax Number	
Production Volume	8644.0
Production Volume Units	Tonnes
Number of Installations	1
Number of Operating Hours in Year	9150
Number of Employees	45
User Feedback/Comments	
Web Address	www.srcl.com

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 ?	No
If applicable which activity class applies (as per Schedule 2 of the regulations) ?	
Is the reduction scheme compliance route being used ?	

5. ONSITE TREATMENT & OFFSITE TRANSFERS OF WASTE

Please enter all quantities on this sheet in Tonnes

0

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 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)
						M/C/E	Method Used					
Within the Country	19 02 03	No	6815.0	premixed wastes composed only of non-hazardous wastes	D1	C	Weighed	Onsite in Ireland	Ballynagran Risidual Landfill,W0165-01	Coolbeg,County Wicklow, , ,Ireland		
Within the Country	19 02 03	No	2601.0	premixed wastes composed only of non-hazardous wastes	R1	C	Weighed	Onsite in Ireland	Lagan Cement,P0487-5	Killeskellen Road,Kennegad,Co Westmeath, ,Ireland		

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

Link to previous years waste data
Link to previous years waste summary data & percentage change