PADRAIG THORNTON WASTE DISPOSAL LTD

THORNTONS RECYCLING CENTRE

Waste Licence Reg. No W0044-02









ANNUAL ENVIRONMENTAL REPORT 2010

SUBMITTED JANUARY 2011

Prepared By:

David Duff - Environmental Manager

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1 INTRODUCTION

This report is the Annual Environmental Report for Thorntons Recycling Centre. It has been prepared in compliance with Condition 11.5 of the Waste Licence (Licence Reg. No. W0044-02) and includes emission details and reporting for the final quarter (Quarter 4) October, November and December of 2010.

This licence was granted by the Environmental Protection Agency (EPA) to Padraig Thornton Waste Disposal Ltd (PTWDL) on the 2nd May 2003. The contents of this report are as required by Schedule F of Waste Licence W0044-02.

1.1 OPERATOR

The facility operator and licensee of licence number W0044-02 is Padraig Thornton Waste Disposal Ltd (PTWDL), T/A Thorntons Recycling. This AER relates to Thorntons Recycling Centre, Killeen Road, Dublin 10.

The address and contact details for the company headquarters are;

Thorntons Recycling, Unit S3B Henry Road, Park West Business Park, Dublin 12.

Telephone: 01- 623 5133 **Fax:** 01- 623 5131

1.2 REPORTING PERIOD

The reporting period for this Annual Environment Report (AER) is 12 months between the 01/01/10 and the 31/12/10.

2 FACILITY ACTIVITIES

2.1 WASTE ACTIVITIES CARRIED OUT AT THE FACILITY

Part 1 of the current Waste Licence W0044-02 lists those activities contained in the Third and the Fourth Schedule of the Waste Management Act 1996, which are licensed to be carried out at Thorntons Recycling Centre, Killeen Road, Dublin 10. These activities are as follows:

Third Schedule

Third Schedule, Class 11: Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule

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

Third Schedule, Class 13: Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned was produced.

Fourth Schedule

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

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

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

Fourth Schedule, Class 8: Oil re-refining or other re-reuses of oil:

Fourth Schedule, Class 9: Use of any waste principally as a fuel or other means to generate energy:

Fourth Schedule, Class 11: Use of waste obtained from any activity referred to in a preceding paragraph of the Schedule:

Fourth Schedule, Class 13: Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced:

2.2 OPERATION PROCESSES - WASTE ACTIVITIES AT THE FACILITY

The following section details the operational procedure for dealing with each particular waste type which enters Thorntons Recycling Centre. (Appendix 1 displays location of each building where processes are carried out).

Process - Household Dry Recyclables/ Commercial Dry Recyclables Building Number 1.

All dry recyclables are weighed into the facility at the weigh bridge on site, tipped in Building 1 and inspected for non-conforming waste. Waste is loaded into a vibrating hopper, which feeds via a conveyor belt into a three tier ballistic separator, for mechanical sorting.

Material passes through the three separate tiers of the ballistic separator which separates two dimensional from three dimensional materials. Two dimensional materials such as paper and cardboard are mechanically shaken and remain at the top of the separator

where they travel onto a conveyor and then into a picking station where non-recyclable materials are removed manually for landfill disposal. Contaminants, plastic films and plastic bottles are picked out and paper is then conveyed continuously to the recyclables baler.

Three dimensional materials such as cans and bottles fall to the back of the separator and are conveyed past magnets which remove all ferrous metals i.e. separating any steel cans. Tetrapak and plastic bottles are removed manually and an eddy current then separates aluminium from other plastics and residual waste which is conveyed to the end of the line for disposal. Recyclable materials such as aluminium, steel and plastic bottles are stored in cages, separately baled in the dry recyclables baler and sent for further processing to facilities approved by the EPA. The environmental manager ensures that all the loads are loaded correctly, all destination paperwork is updated and that all end destinations used by the company have approval from the Environmental Protection Agency (EPA). A full detailed register of all waste destinations is available for inspection on site.

The dry recycling mechanical segregation process in Building 1 was closed down on the 18th December 2010, and fully dismantled in early January 2011. The dry recycling process will be moved to larger facility in 2011 under a permit from the local authority. The only remaining plant in Building 1 is the baler and the in floor conveyor. This is currently being used to bale the clean and pre segregated cardboard from commercial customers and also to bale plastic films. The mixed dry recyclables are bulked in building 1 for onward transport to a temporary third party sorting facility until our new facility is fully commissioned. The area in Building 1 will be used for storage and for loading SRF into trailers for onward transport to the end user.

Process – Cardboard and Plastic Bales Building Number – 1

A cardboard only and plastic only collection is offered by Thorntons Recycling. The material is weighed and tipped in Building 1. All cardboard and plastic loads are inspected upon tipping and any contaminants are removed before the material is then fed into the recycling baler. Bales of cardboard and bales of plastic are then sent to approved facilities for further processing.

Process - Household Municipal Waste Building Number - 3

Household waste is deposited in Building 3. Waste is inspected on tipping and bulky material is removed by a Fuchs grab. Non-conforming waste which may be present is also removed and placed in the quarantine area for later disposal with an approved third party. Suitable domestic material is loaded onto the baler conveyor, baled into 2 tonnes bales and conveyed automatically into white box trailers which are transported to a licensed landfill in County Kildare for disposal or bulked in trailers and sent to a licensed landfill in County Kildare. The process of baling waste at Killeen road ceased on the 21st December 2010, as Arthurstown landfill closed. The baler was dissembled and removed

during the last week of December and the first week in January 2011. Since then, MMW waste is being bulked up in Building 3 and is consigned to landfill in ejector trailers. Thorntons recycling has forwarded plans to the EPA to develop a processing line which will enable Thontons to recycle metals and aluminium from the black bin municipal waste, to produce a suitable SRF material from the dry proportion of the black bin (oversize material) and then landfill the remaining residue material (undersize). This will further boast recycling rates at the facility and assist in further diversion from landfill.

Process – Compostable Waste (Brown Bin, Source segregated and green waste). Building Number – 3

Thorntons Recycling accepts and collects source segregated compostable waste from domestic and commercial customers. This material is tipped in Building 3 in a designated bay and is separated from normal household municipal waste by a dividing wall. Waste is inspected on tipping and bulky material is removed by a grab and any non-conforming waste is removed for quarantine disposal such as large black plastics bags etc. Suitable compostable waste is reloaded into artic trailers using a grab, for further processing in Thorntons Recycling composting facility, Kilmainhamwood, Co Meath, waste licence W0195-01.

Process - Mixed Unsegregated Commercial/Industrial Municipal waste (CI) and Mixed Unsegregated Household waste/ Skip Waste Building 2

All skip waste is accepted at the facility as per the waste acceptance procedure and is weighed at our weigh bridge and recorded in our automated computer system (WIMS). All skip waste is tipped in Building 2 and inspected for any non- conforming waste material, the presence of such items are handled using procedure EP04 "Handling unacceptable wastes". All skip waste is fed into a shredder (M & J Waste Reducer) where it is broken into smaller particles and fed into a slot conveyor and in turn into the long objector remover; this equipment through its action has the ability to remove long pieces of metal or timber, which are then fed back into the waste reducer.

The remaining materials then passes through the first stage of the process under an over band magnet. The over band magnet removes all ferrous metal which pass onto a metal conveyor into a picking station where contaminates such as small pieces of paper or plastic, which have become tied up in the metals attracted to the magnet, are manually removed. The trommel transfer conveyor then transports the remaining materials minus the ferrous metals through a trommel drum. The materials are turned in the trommel and the soil fines and small stones (<40mm in size) pass through the 40mm holes present in the trommel onto a trommel discharge conveyor which in turn passes through the back of building 2 into the C & D processing area for further processing.

The remaining material is fed directly into the nihot system. Within the nihot system circulation fans 1 & 2 discharge jets of air to sort the material by weight. Drum 1 separates the stone from the rest of the materials which in turn joins the trommel

discharge conveyor mentioned above and are passed through the back of building 2 to the construction and demolition processing area. Drum 2 of the nihot then removes the timber which in turn moves along to be further sorted. The remaining material after the stone and timber has been removed falls onto a light fraction conveyor under the nihot and is conveyed to a shredder. This shredder was installed at the facility in August 2009. The material once shredded to <25 mm falls to a conveyor under the shredder and is conveyed to a static hopper which continuously loads the shredded Solid Recovered Fuel (SRF) into a closed artic trailer.

Timber which is separated from the nihot processing area is transported via a transfer conveyor through a picking station, where wiring, textiles and copper are removed manually. The timber then passes into a ballistic separator were contaminants such as plastic and paper are removed. The plastic and paper is conveyed under a magnet and combined eddie current to remove any small metallic objects before the paper and cardboard is conveyed to the SRF shredder. The remaining timber from the ballistic separator passes through a final picking station, whereby any remaining contaminants are removed before the timber falls into a trailer for transport to our wood chipping permitted facility in County Kildare.

Process – Construction and Demolition Waste (C&D) Building - 2

Construction and Demolition waste is loaded into the M&J reducer as with the skip waste waste above, the soil and stones are segregated at the trommel and Nihot stages the resultant materials pass along a conveyor in building 2 to the C&D processing area. The mixed material first passes through a 50mm trommel. Stone which is greater than 50mm in size will then pass on to a conveyor belt under an air blower and then through a picking line where contaminants removed, before passing under a magnet to remove any ferrous metal. The stone then passes into a crusher and the final clean stone product is stored in a purpose build storage shed in Yard 2/Josies Yard, from where it is loaded and delivered to customers.

Stone <50mm, fines and soil enter into a flip flop 8mm screen. Particles/soils which are less than 8mm fall through the screen and are stored underneath in a purpose built storage bay. Small stone and remaining material which is greater than 8mm in size is conveyed into a nihot single drum separator where debris/contamination such as polystyrene etc are removed by an air blower and fall into a storage bay beneath. All small stone which is greater than 8mm and less than 50mm are conveyed via a number of conveyors to the storage area of building 4 where it is stored and then loaded into trailers for customers.

The process produces products such as small stone, crushed rubble and ferrous metals, all of which are suitable for sale and diverted from landfill. The soil which is removed from the C & D process is sent to landfills as daily cover.

2.3 WEIGHBRIDGE CALIBRATION

Weights and measures carried out and an independent assessment on the 25th January 2011 on both bridges. Both the in and the out bridge passed and has being verified as fully compliant by Legal Metrology (DN/07/11/001 and DN/07/11/002)

3 QUANTITY AND COMPOSITION OF WASTE RECEIVED, RECOVERED AND DISPOSED OF IN 2010

3.1 WASTE HANDLED IN THORNTONS RECYCLING CENTRE

The quantities of waste received during the current and previous AER reporting periods for the past three years are summarised in *Table 1*

Table 1 Summary of total waste received in 2010 and previous 2 years

Year	Winds Torongs in
2008	207,307
2009	195,960
2010	199,035

All waste is checked and documented at the weighbridge in accordance with our waste licence and our waste acceptance procedures. Waste is then inspected, segregated, processed and reloaded for either disposal at a licensed facility or bulked for delivery to an approved recycling or recovery facility for further processing. Should any non-conforming waste come to the attention of our staff it is either rejected before collection or segregated and quarantined to be disposed of by a licensed contractor, paperwork is maintained on site. Our environmental management system which contains procedures, including our waste acceptance procedure, is certified to ISO 14001; information in relation to same can be located at any of the Thorntons Recycling offices.

All waste destinations used by Thorntons Recycling Centre in 2010 have been approved by the Environmental Protection Agency. A register of all EPA agreed facilities for recovery/disposal of waste is maintained on site.

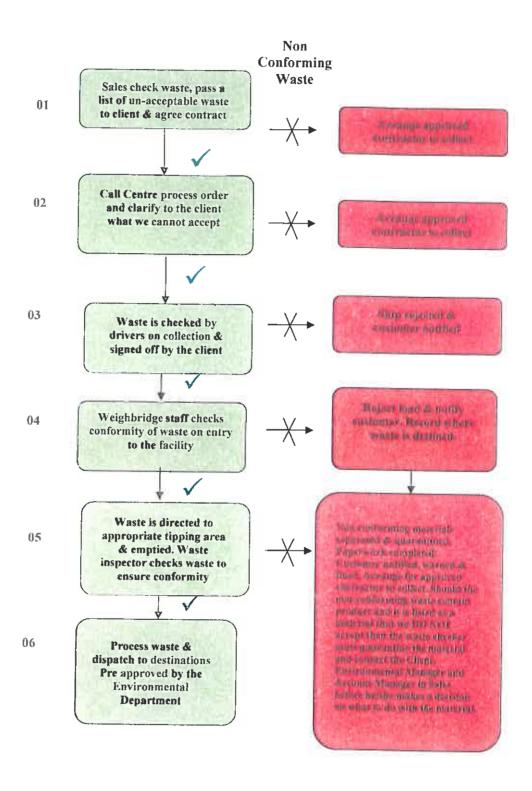
3.2 WASTE ACCEPTANCE

Below is a simplified diagram explaining our waste acceptance procedure at Thorntons Recycling Centre.

New staff employed by the company in 2010 received an Environmental, Health and Safety Induction which includes licence training, waste acceptance procedures,

emergency procedures and environmental awareness. All staff employed at the facility are diligent in assisting in eliminating the occurrence of non-conforming wastes.

As the EPA is aware Thorntons Recycling has a certified management system for ISO14001 Environmental, ISO 9001 Quality, OHSAS 18001 Health and Safety. The Integrated Management System (IMS) is available for inspection on the IMS Drive at any of the companies' offices.



3.3 WASTE RECEIVED

A total of 199,035.22 tonnes of waste was received at the facility in the reporting period of 2010. Details of which are contained in Appendix 2 of this report. Figure 1 illustrates the trend in waste received at the facility between the period 2001 and 2010.

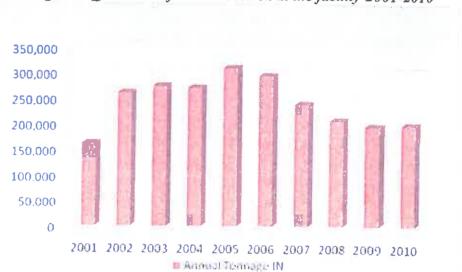


Figure 1 Quantities of Waste received at the facility 2001-2010

3.4 WASTE CONSIGNED TO LANDFILL AND RECYCLING/RECOVERY FACILITIES

A total of 196,460.19 tonnes of waste was consigned from the facility in the reporting period of 2010. Details of which are contained in Appendix 3 of this report. Figure 2 illustrates the trend in waste consigned from the facility between the period 2001 and 2010.

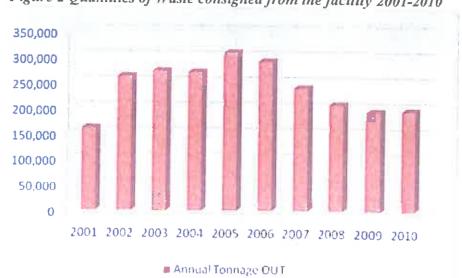


Figure 2 Quantities of Waste consigned from the facility 2001-2010

The facility displayed another increase in the recycling rates for 2010. The overall recycling/recovery rate for the facility was 70.83%, which is the highest figure recorded for the facility since operations began. This is an increase of 16.65% on the previous year and is an excellent achievement partially due to increased awareness, education and segregation of customer's wastes and also due to the installation of the new SRF production line in 2009, which was in operation for the first time for the whole year. The facility in 2010 accepted less material for landfill and increased the intake of material for processing and recycling on site through the CID line all of which has contributed to diverting material away from landfill. Thorntons Recycling has being producing an SRF (Solid Recovered Fuel) from the residue of the skip waste. The fuel is made to a high quality so that it meets the specifications of the receiving facility, which is a cement kiln in Co. Meath. The cement kiln uses the SRF as a substitute for coal which is a high carbon producer when burned. The use of SRF from a residue waste has enabled the cement kiln to lower its carbon footprint by using a sustainable fuel and also reduce its reliance on fossil fuels as a raw material in the production of cement. The SRF is tested on a regular basis to ensure that it meets the acceptance criteria. The production of the SRF has helped Thorntons reduce the quantity of material which would otherwise have being destined for landfill. Following surveys carried out on the SRF, 30% was found to be packaging waste, which is now being recovered as part of the national packaging recovery targets and diverted from landfill.

Overall since 2003, the Killeen road facility has shown a positive trend in diverting a high percentage of material away from landfill, through continuously improving the sorting techniques and sourcing markets for recyclates (Figure 3). The recycling rate of waste has increased from 12.14% in 2003 to 70.83% in 2010, which is a massive increase

and demonstrates Thorntons commitment to increasing recycling and diversion from landfill all of which contributes to the national recycling figures.

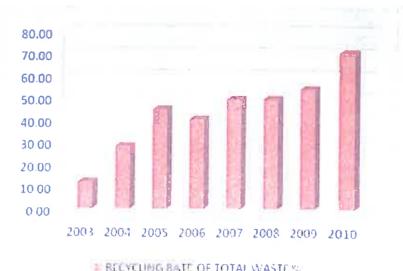


Figure 3 - Recycling rate trends for waste between 2003 to 2010

* RECYCLING BATE OF TOTAL WASTEN:

The total quantity of waste recovered or recycled has increased steadily at the facility. PTWDL process, sort and segregate all skip waste at Thorntons Recycling Centre, Killeen Road, Dublin 10 and strive to improve process efficiencies on a continuous basis. In recent years due to new processes and efficient and effective control in operations at the facility we now process all dry skip waste which enters the site; the results have had dramatic increases on recycling rates. The main materials which are currently being recovered from skip waste include wood, ferrous metals, non-ferrous metals, soils and stone and a solid refuse fuel, which is used as a substitute for coal in the cement manufacturing process in Ireland.

It is hoped that Thorntons Recycling Centre will continue to increase its recycling and recovery rates in 2011 by;

- Continuing to work to International Standards ISO 14001 Environmental, ISO 9001 Quality and OHSAS 18001 Health and Safety with continuous development and improvement of new operational procedures.
- Planning to start processing the residual black bin waste, to separate suitable SRF material, biodegradable material and suitable recyclables such as metals and aluminium from the material which currently is all destined for landfill. This activity will take place within the confines of Building 3 and is hoped to commence in 2011.

- Continuous training and education of staff at all levels on recyclable material types and the development of new outlets for new materials.
- Business Development. Thorntons recycling have developed a new on line skip service www.skip.ie and in 2010 expanded their domestic collection services to include South Dublin.
- Integrated waste management service offered that encourages clients to opt for different types of bins for different waste types. The company has also introduced a tankering service division (TTS Thorntons Tankering Services), confidential shredding service and composting / brown bin service to all our customers
- Our licensed composting facility Kilmainhamwood Compost is approved by the Department of Agriculture (Composting Approval Number COMP/6) and also approved in line with SI 612/2006 and EC 1774/2002. The facility is the holder of the Cre Award for Best Composting Facility of the Year. We will continue to reduce biodegradable material being sent to landfill by offering a three bin service to all our customers. In 2010 Thorntons Recycling invested in a second vehicle for source segregated compostable waste collections. This service assists commercial customers in complying with the new Waste Management (Food Regulations) 2009 which will have been enforced since July 2010.
- Thorntons Recycling has invested in the latest technology for confidential shredding
 in situ with the purchase of a state of the art shredding vehicle with CCTV camera
 system and developed a secure shredding facility which is permitted by Dublin City
 Council (WP98116).
- Continued education of new and existing clients on new regulations and their obligations in relation to the law. Thorntons Recycling offer educational workshops to existing customers
- Continue to offer reduced rates to customers who segregate their waste, for example wood, metal, dry recyclables, glass, plasterboard and compost bins
- Continually improve on service and our after sales service
- Offer presentations and demonstrations on our client premises and schools
- Awareness through the publishing of newsletters, continuous development and updating of the website for Thorntons Recycling
- Thorntons Recycling won Repak Recovery Operator of the Year Award 2008 and was a finalist in 2009 and 2010.
- Thorntons Recycling has entered the domestic market in South Dublin County Council in 2010 and plants on continuing to increase our base in this area in 2011 by offering potential customers an efficient and effective three bin collection service.
- Thorntons Recycling are developing a new state of the art dry recycling facility which will produce a high quality of segregated recyclates and recover more material to increase the companies recycling rate further.

4 CONTRIBUTION TO THE ACHIEVEMENT OF RECOVERY TARGETS

4.1 Proposal for the contribution of the facility to the achievement of targets for the reduction of Biodegradable waste to landfill as specified in the landfill Directive

Progressive targets have been set out in the Landfill Directive (1999/31/EC) to reduce the proportion of biodegradable municipal waste landfilled. Biodegradable waste is waste that can undergo biological decomposition and is typically composed of food and garden waste, wood, paper, cardboard and textiles. By 16th July 2010 Ireland is restricted to landfilling a maximum of 75% of the total weight of biodegradable municipal waste generated in 1995, the baseline year. This target is further reduced to 50% of the 1995 baseline by 16th July 2013 and 35% by 16th July 2016. According to the National Waste Report 2008, an estimated 2,091,709 tonnes of biodegradable municipal waste was generated in Ireland in 2008 of which 57% was land filled. Ireland has made significant inroads into closing the gap between the EU targets and where we currently stand and Thorntons recycling is playing their part.

Thorntons Recycling own and operates an award winning compost facility Kilmainhamwood, County Meath which is approved bv of Agriculture (Composting Approval Number COMP/6) and also approved in line with SI 612/2006 and EC 1774/2002. The facility was awarded in 2008 the "Cre Best Composting Facility Award" in Ireland. Thorntons Recycling Centre, Killeen Road. Dublin 10 has been successfully contributing towards National Targets by using this facility as a destination and now offers all our commercial customers the option of a brown bin for food waste/catering waste etc. The facility has developed its own segregated area for this material which is fully enclosed in an odour controlled building. We accepted approximately 19,471.70 tonnes of Green Waste and Brown Bin Waste for composting in 2010 which after any contamination was removed the remaining was bulked at the Killeen Road facility and sent for composting in Kilmainhamwood Compost, Waste Licence W0195-01. This is an increase of 39.7% on the previous year. Thorntons Recycling diverted approximately 22,663.20 tonnes in 2010 of biodegradable waste in the form of cardboard, paper, Tetrapak and wood. In total 37,508.63 tonnes of biodegradable waste have been diverted from landfill by the facility in 2010. This represents a facility diversion rate of 39.56% of organic waste from landfill and demonstrates Thorntons Recycling ability to assist in meeting the national target for 2013. With the proposed processing of municipal solid waste in 2011 to segregate recyclates, organic fines and SRF, Thorntons Recycling will be able to divert more waste from landfill.

We offer all our customers the opportunity to segregate all biodegradable waste at source and the option of a composting alternative to all our customers. Kilmainhamwood Compost (Waste License W0195-01) has proven to be very successful. The facility accepts non-hazardous biodegradable wastes (household and commercial waste for composting) and accepted 20,815.65 tonnes of biodegradable waste in 2010 which was successfully diverted from landfill by Thorntons Recycling. Thorntons Recycling will

aim to continue to increase the quantity of biodegradable waste that can be diverted from landfill even further and assist Ireland in achieving targets laid down by the landfill Directive (1999/31/EC). An application for a review of the current licence has been lodged with the EPA in 2010 to increase tonnage at the facility. Planning is currently with An Bord Planeala. If approval is granted by both the EPA and An Bord Planeala then Thorntons Recycling will be in a better position to divert more biodegradable waste away from landfill as we will have more capacity on site and be able to accept all the compostable waste with is bulked at Killeen road.

4.2 The separation of recyclable materials (paper, wood, plastic, inert materials) from the waste & the recovery of commercial waste, including cardboard, newspapers/magazines, aluminium and steel cans.

Thorntons Recycling carries out a number of operational processes on different types of waste which allows for the separation of the above materials. These are detailed in the following section:

Dry commercial, industrial and domestic skip waste which enters the facility are checked upon tipping and any large bulky items that can be recycled such as wooden furniture and metals are removed by a grab and are segregated into piles to be sent for further processing. The remaining material is then sent through a high specification plant, this consists of equipment such as a crusher, long object removers, ferrous metal remover, trommel, nihot, ballistic separator, picking lines and a shredder, the working combination of which has resulted in a significant increase in recycling and recovery rates at the facility.

All dry recyclables are weighed into the facility at the weigh bridge on site, tipped in Building I and is inspected for non-conforming waste. Waste is loaded into a vibrating hopper, which feeds via a conveyor belt into a three tier ballistic separator, for mechanical sorting.

Material passes through the three separate tiers of the ballistic separator which separates two dimensional from three dimensional materials. Two dimensional materials such as paper and cardboard are mechanically shaken and remain at the top of the separator where they travel onto a conveyor and then into a picking station where non-recyclable materials are removed manually for landfill disposal. Contaminants, plastic films and plastic bottles are picked out and paper is then conveyed continuously to the recyclables baler.

Three dimensional materials such as cans and bottles fall to the back of the separator and are conveyed past magnets which remove all ferrous metals i.e. separating any steel cans. Tetrapak and plastic bottles are removed manually and an eddy current then separates aluminium from other plastics and residual waste which is conveyed to the end of the line for disposal. Recyclable materials such as aluminium, steel and plastic bottles are stored in cages, separately baled in the dry recyclables baler and sent for further processing to facilities approved by the EPA. The environmental manager ensures that all the loads are

loaded correctly, all destination paperwork is updated and all the end destinations used by the company have approval from the Environmental Protection Agency (EPA).

Detailed quantities of material received and consigned from the facility are displayed in Appendix 2 and 3 of this report. Table 2 compares results submitted for Annual Environmental Reports for 2008 to 2010 for materials recycled at the site;

Table 2 – Comparison on recyclable material consigned 2008-2010

Peral Minorals Donainned	2008 Tennes	2009 Torrneo	2018 Summer
Cardboard Out	4,135	4,250	4,294
Metals Out Packaging (Aluminium and Steel)	373	534	228
Plastics Out (Bottles, Film and Hard)	2,654	2,032	1,308
Tetrapak	13	5.6	0
Mixed Papers	16,338	13,848	8,109
Wood Out	10,550	10,653	9,746
Mixed Metals Out (Bulky)	4,021	3,787	4,193

Packaging waste in general consigned from Thorntons Recycling Centre has decreased in 2010, due to the decrease in the incoming tonnage of co mingled collections.

Since March 2003, producers of packaging are obliged to segregate for recovery specified packaging waste materials at source. Thorntons Recycling has a team of account managers who educate customers on the advantages and their legal obligations for segregating packaging waste.

As stated in the National Waste Report 2008 published by the Environmental Protection Agency, Ireland had surpassed its 2005 target of 50%, in 2003 and the next target is for 60% by 2011, which was surpassed in 2007 when the national recovery rate was 63.6%. Thorntons recycling has played a significant part in the packaging recovery rate. During 2010 Thorntons Recycling carried out a Repak survey on the packaging content of the mixed paper bales, which are sold for recycling. Thorntons Recycling has also increased packaging diversion from landfill through the production of SRF material at the facility. A survey of the SRF carried out in 2009 found that 30% of the SRF is packaging waste.

4.3 THE RECOVERY OF CONSTRUCTION AND DEMOLITION WASTE

Under National and European waste policies, Ireland is expected to recycle 85% of Construction and Demolition Waste by 2013. Mixed Construction and Demolition materials received at the facility had increased steadily between 2003 to 2006. However

2007 to 2010 showed a decrease in the quantity of this material accepted from 60,214 tonnes in 2006 to 57,501 in 2007 tonnes to 36,055 tonnes in 2008 to 22,799 tonnes in 2009 and a further decrease to 13,824 tonnes in 2010. This decrease in particular of construction and demolition waste can be attributed to the downturn in the economy and the slowdown in development projects nationally, which would have being a large part of the incoming material in 2004-2007.

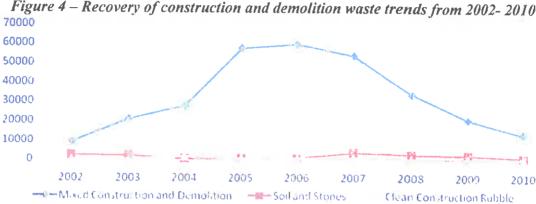


Figure 4 - Recovery of construction and demolition waste trends from 2002-2010

Quite often construction and demolition material arrives at the facility as a mixture of soil, rubble and somewhat contaminated with small pieces of plastic, polystyrene, metals, wood and other materials. These are removed during processing at Thorntons Recycling Centre and segregated into individual waste streams for processing. Clean stone is crushed at the facility and can be used as a product suitable for backfill and private road construction as the base layer. If incoming skips are mixed with numerous different waste types they are weighed in as mixed Municipal Waste, only waste which originated from construction or demolition sites is weighed in as Mixed C&D waste.

THE RECOVERY OF METAL WASTE AND WHITE GOODS 4.4

White goods arrive at the facility mixed in with skip waste. All white goods are picked from the waste and stored in skips before being transferred to a designated facility for Waste Electrical and Electronic Equipment (WEEE). All mixed metals are stored at the facility in designated bays and sent to approved destinations in Ireland where they are further segregated into different types i.e. Copper, Aluminium etc. Quantities of metals recycled can be noted in Table 3 above. Thornton's Recycling offers a reduced price to customers who segregate metal completely.

4.5 CONVERSION OF WASTE VEGETABLE OIL INTO A BIO FUEL

Thorntons Recycling Centre does not process waste vegetable oil into bio fuel on site and have no plans to do so in the near future.

4.6 RECOVERY FACILITIES PROPOSED TO ACCEPT SHREDDED OR WHOLE TYRES

Tyres normally arrive at the facility mixed in with other materials, for example in household skips. In 2010 these were segregated and stockpiled until a sufficient pile was achieved. These were then sent to our End of Life Vehicle (ELV) Centre, Waste Permit WFP-DC- 09-0005-01, where they are bulked with other tyres from the recovery process of end of life vehicles and sent to processing facilities within Ireland for further processing into a crumb material. An annual recycling cert is maintained on site for the 44.07 tonnes of tyres sent to the ELV facility in 2010 from Killeen road.

5 SUMMARY REPORT AND INTERPERTATIONS OF ENVIRONMENTAL MONITORING AND EMISSIONS DATA

In accordance with Schedule D: Monitoring of PTWDL waste licence W0044-02, monitoring of dust, noise, surface water and foul water must be carried out. Odour monitoring is also completed by an independent consultant bi annually. All monitoring has been completed as required for reporting period 2010. The following section details results obtained and interpretations of results for the year of 2010 including those for the last quarter of 2010. Due to the compilation of this report Quarter 4 monitoring reports have not been forwarded to the EPA and have been included in the main body of this report.

5.1 DUST

Annual Dust Monitoring was carried out at five locations D2, D3, D4, D5 and D7. Thorntons Recycling are required by Schedule D to monitor dust three times a year, results are displayed in Table 3 and Figure 6. The locations of each dust monitoring point are displayed in Figure 5. During the year monitoring location D4 was inaccessible due to the closure of the business where the monitoring point was located and the new owners has not given approval for monitoring to be carried out.

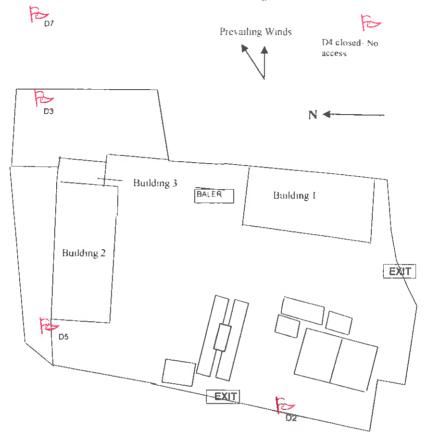


Figure 5 - Dust Monitoring Locations

Thorntons Recycling Centre is located in a predominately industrial area. Two busy roads i.e. the Killeen Road and Kylemore Park North form the western and northern site boundaries of the facility. Monitoring points D2 and D5 are located on these boundaries and as a result receive significant contamination from passing traffic and vehicles accessing Park West Industrial Estate, Nangor Road and Ballyfermot.

Table 3 Dust Results for 2010

Monitorum Locations	Cloarter 1	Quarter 2 19:05:40 19:06:10	OBJORATOR TO	ELV Note
D2	171.5	321.5	August 150.7	350
D3	123.3	207.4	90.4	350 350
D4	n/a	n/a	n/a	350
D5	150.1	202.3	75.4	350
D7	182.2	191.9	60.3	350

The emission limit value for dust deposition is 350mg/m²/day. During 2010 none of the dust emission levels exceeded the emission limits (Table 4). Monitoring dust at locations D2 and D5 has shown that the predominant dust source is from the roads which boarder the monitoring locations. Figure 7 shows the trends in dust deposition during the year and as expected dust deposition levels are highest during the drier months of May 2010.

Thorntons Recycling will aim to reduce dust deposition levels within our power to do so and will continue to monitor dust on a regular basis. Thorntons Recycling staff use power hoses to wet down yard surfaces at the facility during dry periods, dust curtains have been fixed to all entrances and exits of the buildings where dust is generated. Maintenance was carried out on these dust curtains in 2010 on Building 3 and on the CID tipping building (2), to improve their coverage over the entrances and exits. During 2010 the roof cladding was extended over the corner of building 2 on the CID building. In 2011 it is planned that dust curtains will be fixed to the exit of building 2 to reduce the likelihood of dust escaping from the building during the drier months. A dust suppression system is in operation in Building 2 when required. In an effort to further reduce dust emissions Thorntons Recycling also uses a road sweeper which is used at least twice daily in the facility. This is also used on the Killeen Road and Kylemore Park North to assist in reducing dust levels due to passing traffic and upwind contributors.

PTWDL recognise the importance of maintaining dust levels below the emission limit level of 350mg/m²/day and are fully committed to maintaining compliant emissions from the facility in 2011.

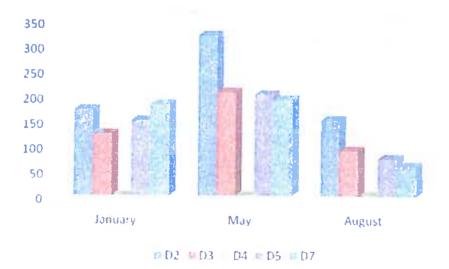


Figure 6 - Dust Monitoring Results per Monthly Sample 2010

5.2 EMISSION TO FOUL WATER AND SURFACE WATER

The monitoring points FW1 FW2 and SW1 are displayed in figure 8. Monitoring is carried out by Thorntons Recycling quarterly, as per the licence. Unannounced monitoring is also carried out by the EPA and split samples are shared with Thorntons Recycling.

Figure 7 Monitoring points for the sampling of Foul Water and Surface Water Thorntons Recycling Centre

*Note 1 - SWI was made redundant in May 2007. The line now passes through the screener in Yard 2 and passes out through FW 5.2.1 FOUL WATER.

Blocked of

In accordance with Waste Licence W0044-02 Schedule D all emissions to sewer must be monitored. Emissions to sewer must be monitored on a quarterly basis. Quarterly reports for Quarter 1 (44-2/10/EPA/DD/13) Quarter 2 (44-2/10/EPA/DD/25) Quarter 3 (44-2/10/EPA/DD/34) have been forwarded to the Agency and this report will constitute Quarter 4 report for 2010. All of these reports detail results and interpretations of monitoring of both the surface water and foul drainage system at the facility.

EMISSIONS TO SEWER (Foul 1) F1

Table 4 Illustrates results received at FW1 monitoring location's for 2010. The results in 2010, shows that there was one exceedance in the limits at FW1 during the year this was reported to the EPA as per the licence conditions (W00-44-02/10/EPA/DD/36 and W00-44-02/10/EPA/DD/37). This exceedance was attributed to detergents being used to wash trailers and also the detergents being used in cleaning the staff facilities on site. The excess oil/grease was deemed to have come from the trailers being washed and the staff was informed to not wash grease off the trailers into the drains. Staff and management were informed of the lab results and the effect of using excess detergents and the follow up set of results six days after showed no exceedances. Full detailed quarterly reports have been forwarded to the EPA as detailed in section 5.2.1.

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Table 4 Results of sampling from FW1 in 2010

Unition 8	のである	Shirth 2	Charles A	Sparter 3	Glaffe ?	9 9 6 9	Glanes A	整想
	Partitors	温をない	Mannes	100 100	- ASSTRANCE	100 000	Thomas	
Parameters	00.00.10	12.05.10	海線線	11.05.10	24 ES ES	M. 11.24	100 AV 52	The second
BOD	134	263	75		278	585	201	4000
COD	272	522	211	115	735	1340	586	8000
Suspended Solids	92	268	46.7	36	364	163	204	1000
pH	8.17	8.21	8.07	8.16	8.1	7.96	7.24	6, - 10
Orthophosphate (asP)	2.88	1.09	1.83	1.94	2.94	1.66	0.0343	50
Surfactants/Detergents	0.255	0.273	0.698	92.0	0.644	145	0.675	20
Conductivity	0.661	0.98	0.527	0.503	0.95	0.754	0.557	n/a
Fats, oil, grease	21.2	7.73	42.2	7.77	29	468	12.3	100
Mineral Oil by GC	3.01	4.74	5.04	1.52	7.76	2.26	2.66	20

EMISSION TO SEWER (Foul 2) FW2

Samples were also taken from Foul Sewer 2 (FW2), results are in Table 5. The results highlighted in red display an exceedance in the emission limit value as set down in waste licence conditions. The exceedances occurred in quarter 2 and were reported to the EPA and the drainage division of DCC as per the licence condition. A follow up investigation was carried out for each exceedance and a full report was forwarded to the EPA.

During quarter 4 there was no exceedance noted on the emissions to sewer at FW2.

Table 5 Results of sampling from FW2 2010

Manager of the second s	Contract.	Charter 1	Charles 1	の事事が	Character	Significant 2	Charter 2	Diame.	Dame 4	Comme
	Petrons	三日本 本の日:	EPA	EPAS SINE	Tol	Thursday.	Terrent	THE REAL	Promise	
Physical physics	1 02 00 10	Di 255 40	DI 20.19	お路台	19 85 60	10 M ct	100 100 100	301 11 22	10 H 10 H	Hilliam
BOD	2350	912	1	5830	5275	232	747	918	294	4000
COD	3830	1410	1498	8410	9095	441	1180	2130	782	8000
Suspended Solids	504	102	142	693	999	97.5	242	291	91	1000
ЬН	6.93	6.74	7.3	4.91	4.9	7.84	7.11	7.11	7.59	6 10
Orthophosphate (as P)	4.82	1.28	0.653	6.9	5.293	9.0	1.36	4.37	0.743	50
Surfactants/Detergents	0.659	1.83		1.79		0.586	0.746	0.356	47.4	50
Conductivity	2.88	1.6		3.99		0.903	1.31	1.83	0.446	
Fats, oil, grease	23.9	14.8	19	88.9	22	14.1	20.4	12	3.56	100
Mineral Oil by GC	5.14	0		4.76		4.48	11.1	2.91	1.73	20

5.2.2 SURFACE WATER (FW2)

The monitoring point for surface water is displayed in figure 8 and the results for each sample are in Table 6. PTWDL re-designed the drainage system on site in 2007 to ensure compliance with licence W0044-02 emission limit levels. SW2 is now the only surface water monitoring point which exists at the facility. This is located in Yard 2 (Josie's Yard) where there is little activity.

As discussed in previous reports to the EPA samples from surface water drains can only be taken when there is heavy rainfall, at any other time the drains are dry leaving samples virtually impossible to gather. During dry periods there is a build up of solids in and around the drains in the yard area, additionally dust builds up on roofs and gutters from up wind sources such as the cement plants. This sediment builds up and is then washed down the drains whenever there is a heavy shower which may attribute to high levels of suspended solids at the SW2 monitoring point during Quarter 3 (W00-44-02/10/EPA/DD/32 and W00-44-02/10/EPA/DD/33) and during Quarter 4 (W00-44-02/11/EPA/DD/01 and W00-44-02/11/EPA/DD/02). The elevated BOD results in Q3 were attributed to a delay in getting the samples to the lab for testing. This was a human error and going forward samples are to be delivered to the lab before 2:00pm on the same day of sampling.

PTWDL recognise the importance of maintaining emissions limits within levels set down by the licence and will continue to do their utmost to ensure compliance with these levels. We will continue to carry out weekly inspections of the drains and ensure regular maintenance is carried out.

Monitores Quarter 1 Chainter 2 COLUMB IN 1 Parameter 4.03 10. 30 00 16 22100 BOD 2 53 6.82 26 25mg/l COD 30.9 54.2 148 80.5 mg/l Suspended Solids 3.5 9.5 64 5 43 35mg/l 7.88 7.98 7.87 6, - 10 Orthophosphate (asP04) 0.03 0.061 0.016 0.03 mg/l Surfactants/Detergents 0.156 0.205 0.157 0.496 mg/l Conductivity 0.33 0.303 0.479 0.485 mS/cm Fats, oil, grease 1 2.4 3.28 1 m Mineral Oil by GC 0.0373 0.995 1.65 0.33 5mg/l

Table 6 Results of sampling from SW2 in 2010

5.3 NOISE

In accordance with Condition 8 and Schedule D3 of waste licence W0044-02 annual environmental noise monitoring was carried out. The day time survey was carried out on the 9th July 2010 and the night time survey was carried out between the 20th July and the 22nd July 2010. The results of the survey were submitted to the EPA on the 17th August 2010 (44-2/10/EPA/DD/29).

Table 7: Noise measuremen	t results for Killeer	i road annual	monitoring in 2010
---------------------------	-----------------------	---------------	--------------------

Monitoring	(8 07 50 B	20,07 50 8	建筑机构	MAY
Locations	LA m retti	L = 10 (dB)	LAND(dD)	(80)
NP1	65.8	69.5	55.5	NA
NP2	71.3	76.3	65	NA
NP3	72.6	75.9	64.4	NA
NP4	68.6	69.5	54.9	NA
NP5	72.8	73.6	70.5	NA
NP6	73.7	78.2	62.8	NA
NP7	65 6	65.7	49.7	55
NP8	62.3	65.8	52.3	55
NP9	70.8	73.9	61.1	55
NP7 Night	54.2	54.5	54.1	45
NP8 Night	60.7	61	60.6	45
NP9 Night	66 6	67	_ 66.6	45

The day time survey concluded that Thorntons Recycling was not responsible for the elevated noise levels at the noise sensitive receptors. The predominant noise source at these locations was from non-site related vehicular movements on the nearby roads. This is verified in the similarity between the LA_{eq} readings and the LA₁₀ readings at these monitoring locations during the surveys and the many sudden spikes in the respective logging graphs. There was audible noise from Thorntons Recycling, such as from Thorntons related traffic, the odour system and the RJP (Regenerative Pulse Plant) at these locations but this was only audible when there was no traffic noise. Thorntons Recycling is not the main source of noise at these monitoring locations during the day time and as a result we believe that Thorntons is in compliance with noise emissions of the waste licence. The LA90 values for the day time monitoring shows that at NP7 & NP8 the noise level was below the ELV, which is a realistic assessment of the noise levels excluding the traffic, which generally occurs in the 10 percentile range.

The night time survey found that night time noise levels were exceeded at all three noise sensitive receptors during the monitoring period. The main source of noise at the locations was from passing traffic and not site activities from Thorntons Recycling. It was noted during the monitoring period that there was vehicular traffic at all locations. While Thorntons Recycling does contribute to the noise levels at N8 and N9, it should be noted that N8 and N9 are not in residential areas and they are not occupied during the

night time hours. These monitoring locations are within an industrial complex where there are other companies influencing the night time noise levels. The N7 night time monitoring recorded vehicular movements which attributed to the increased noise levels during the night time. The similarity between the LAeq and the LA90 values for the night time monitoring indicates that there was a persistent noise source with little fluctuation, such as traffic at a distance during the monitoring period.

Thorntons Recycling consider that although the noise levels at the noise sensitive locations are exceeded during day time and night time monitoring Thorntons Recycling are not the primary cause of the noise at the locations. Elevated noise readings can be attributed predominately the high levels of un-associated traffic in the area and the presence of numerous other industrial businesses in the immediate vicinity all of which are not under the control of Thorntons Recycling. As a result we believe that Thorntons Recycling is in compliance with its waste licence in relation to noise during 2010.

5.4 ODOUR

In order to ensure complete efficiency of the Odour treatment system Thorntons Recycling contract Odour Monitoring Ireland to carry out independent monitoring of the Odour treatment system every six months as agreed with EPA (Your reference W0044-02/ak01NH.doc).

Two reports were forwarded to the EPA in 2010 for testing carried out on the 16th January 2010 (44-2/10/EPA/DD/13) and in 19th July 2010 (44-2/10/EPA/DD/27).

Reports issued to the EPA show that the system is working effectively, using Olfactometry testing and dispersion modeling the reports conclude that Odour from Thorntons Recycling Centre did not have any negative impacts on the surrounding environment on the days of testing during 2010.

6 RESOURCES AND ENERGY USAGE

The following section discusses resources such as Electricity, Fuel and Water used at Thorntons Recycling Centre in 2010.

6.1 ELECTRICITY

Electricity consumption in 2010 increased at the facility from a total of 2,275,188 kWh in 2009 to 2,760,613.88 (estimate for November and December used) in 2010. This increase in units used can be partly attributed to the increase in tonnage processed. The average usage of power per tonne produced is largely consistent throughout the year with only minor fluctuations. In early 2011 the facility will change over to full power being electrical which will be monitored by a separate tracking system and this will enable us to better determine energy usage trends and identify where energy saving measures can be made. During 2010, a monthly report on energy usage was forwarded to managers which

show the daily and nightly usage trends and also the usage per tonne processed for monthly comparisons.

An energy register of opportunities was created in 2010 which details potential energy saving opportunities on site. The register allows for all the opportunities to be ranked by cost saving, carbon dioxide saving potential, ease of implementation etc. During 2010 Thorntons Recycling began completing the opportunities from the register and has highlighted new areas to focus on in the first half of 2011. The register will be reviewed annually and updated accordingly to ensure continual improvement.

Figure 8 illustrates the monthly daily and nightly usage of electricity on site during 2010. The graph shows a predictable patter with consistent energy being used month with a slight increase during the winter period, when more lights are required.

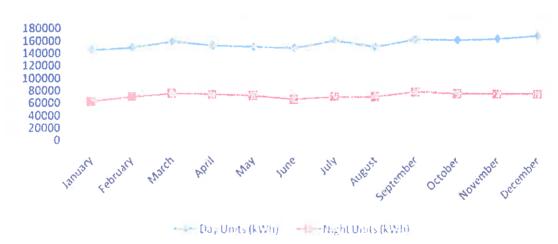


Figure 8 Day and Night Electricity usage by the month 2010

6.2 WATER

In 2010 the facility used 2,850m³ of water compared to the 2,828 m³ in 2009. This represents an increase of just 0.7% on the usage of 2009. Water is used on site to dampen down dust during dry period and to wash the floor and hardstanding area and also to wash plant and vehicles. The use of water is kept to a minimum which is required to ensure a safe and clean working environment.

6.3 DIESEL

The main types of fuel used at Thorntons Recycling Centre include road diesel, plant diesel and machinery (Gas Oil) and heating oil (Kerosene). The breakdown of fuel

consumed is detailed in Figure 9 below. In 2010 a total of 493,297 litres of plant diesel and 1,378,430 litres of road diesel were consumed.

The consumption of road diesel decreased by 12,836 litres from 2009's consumption level. Plant diesel decreased by 182,363 litres from 2009's consumption. There was 1000 litres of kerosene purchased for the offices in 2010.

Invoices in relation to all Thorntons facilities are sent to the head office of the company at Thorntons Recycling, Unit S3B, Park west Business Park, Dublin 12. Every effort has been made to distinguish between individual facilities to ensure an accurate fuel consumption report for Thorntons Recycling Centre, waste licence W0044-02.



Figure 9: Fuel consumed by month in 2016

MiPlant Gas oil #Read diese!

7 DEVELOPMENT / INFRASTRUCTURAL WORKS

7.1 SITE DEVELOPMENTS 2010

The following summarises the main developments made at the facility in 2010;

Buildings and Waste Processing Equipment

 The installation of a raised conveyor in the CID building to allow material suitable of SRF production to be fed directly into the Linder shredder without been processed through the whole CID line. This allows for increased efficiency and energy usage within the processing line and enables a better quality of SRF to be produced at the site by blending suitable materials.

- The roof area of Building 2 was extended from the timber picking line to join the building cladding of where the skip waste is tipped. This increased roofed area assists in litter prevention, dust mitigation and also prevents rain blowing into the shed and processing lines. Thornton's recycling aim to erect dust curtains on the exit in early 2011 for dust.
- The mixed municipal waste baler was removed from Building 3 in late December, as the outlet for baled MMW closed i.e. Arthurstown landfill in County Kildare.
- The dry recycling line was decommissioned at the end of December 2010 to make way for planned new infrastructure in 2011.

Training

- Staff training ISO Training and auditing carried out
- Staff training On non conforming wastes
- Emergency Response Training Fire drills

ISO

 Thorntons Recycling Centre passed a successful surveillance audit which was carried out by Certification Europe in 2010 to maintain standards for ISO 14001 Environmental, ISO 9001 Quality and OHSAS 18001 Health and Safety.

7.2 PROPOSED DEVELOPMENTS IN 2011

A number of developments are proposed for the forthcoming year of 2011. All developments are carried out with the intention of reducing environmental impacts of the facility and increasing waste processing efficiency at Thorntons Recycling Centre. Thornton's Recycling's main aim is to reduce as much waste as possible for landfill disposal in line with national policy and further increase recycling and recovery rates at the facility.

- It is proposed that dust curtains will be put on the new roofed area of the CID line. This will reduce the potential for any nuisances such as litter and dust to escape from the building.
- It is proposed that the MMW in building 3 will be processed to remove material suitable for SRF production and divert further waste from landfill. Letters detailing the process has being forwarded to the EPA during 2010 (Ref W0044-02/EPA/DD/04 and W0044-04/EPA/DD/12). The process will enable for metals and aluminium to be recycled form the black bin, for organic fines to be separated and for the light paper and plastic fraction to be used to produce an SRF material.
- Continuous Development on company procedures in line with ISO certification

Any planned infrastructural developments will be notified in advance to the EPA.

7.3 PLANT CAPACITY 2010

A detailed report on plant operating capacity, provision of adequate standby capacity and provision of contingency, backup and spares in case of breakdown is contained in Appendix 5 of this report.

Without taking into consideration the spare plant and machinery available at other Thorntons sites the report concludes that it is apparent from the information supplied that Thorntons Recycling Centre has well above the sufficient capacity required to handle waste tonnages permitted to enter the facility.

Thorntons Recycling has employed a full time maintenance manager who is responsible for ensuring there are adequate spare parts at the facility at all times. A state of the art maintenance workshop was developed off site in Park West Industrial Estate with a team of staff who are capable of carrying out repairs as needed.

An additional service bay and maintenance workshop has been maintained on site with one electrician and two maintenance men at Thorntons Recycling Centre. Plant is serviced and maintained as required over a daily double shift, which enables plant which is required during the day to operate at full capacity and then have necessary maintenance carried out at night time.

8 SCHEDULE OF ENVIRONMENTAL OBJECTIVES AND TARGETS FOR 2011 AND PROGRESS REPORT FOR 2010

Thorntons Recycling operates an Integrated Management System (IMS) which has been certified to a number of standards namely; ISO 14001 Environmental, OHSAS 18001 Health and Safety, ISO 9001 Quality.

The complete content of the IMS itself is too large to contain within the main body of this report, however the Agency can access this for inspection on a specially designated Drive (X Drive or IMS Drive) at any of the companies' site offices.

A detailed report table on progress towards the achievement of the Environmental Objectives and Targets for 2010 is contained within Appendix 6 of this report. The schedule of environmental objectives and targets for 2011 has being included but may be amended and finalised after the management review in March of 2011. This schedule will be available for the EPA to inspect during any of their site audits in 2011 at any of our facilities.

9 SUMMARY OF PROCEDURES DEVELOPED BY THE LICENSEE IN 2010

As discussed previously with the EPA Thorntons Recycling have an IMS system to incorporate Environmental, Quality and Health and Safety and have achieved certification in ISO standards 14001, ISO 9001 and OHSAS 18001.

In 2010 the system was continuously developed and improved. Two surveillance visits were carried out by Certification Europe in 2010 which the company were recommended for maintenance of certification.

Due to the large content of the IMS system it is not possible to include it in the main body of this report but it is available for inspection at Thorntons Recycling, Killeen Road, Dublin 10.

10 TANK, DRUM AND PIPELINE TEST

10.1 TANK BUNDING

Thorntons Recycling commissioned Fehily Timoney and Company, environmental consultants to complete testing on the main diesel bund and the C & I bund. The C & I bund passed testing on the 23rd August 2007. This bund is due to be decommissioned in early February 2011 as the generator in this bund will no longer be in use as Thorntons Recycling will be changing all plant over to electrical power. The bund will remain in place as is a concrete structure and will be tested if in use at the same time as the main diesel bund on site. The main diesel bund passed its test on the 13th February 2008 and is not due to be re tested until the 13th February 2011. As per Condition 3.11.6 of waste licence these bunds are tested every three years. From 2011 onward the scheduling of the two bunds will take place at the same time for increased efficiency.

10.3 PIPELINE TESTS

Thorntons Tankering Services (TTS) completed a full CCTV drain survey at the facility during November 2009 on both the surface water drains and the foul water drains in both the main yard and in Yard 2 (Josies yard). These reports were submitted to the EPA as well as a DVD of the survey in January 2010.

The integrity and water tightness of all underground pipes and tanks and their resistance to penetration will be carried out once every 3 years as per Condition 3.13.7 of the waste licence.

11 SUMMARY OF INCIDENTS AND COMPLAINTS

11.1 INCIDENTS

The following table summarises incidents which occurred at the facility in 2010. These were reported to the Agency and actions were put into place to resolve the issues;

Table 8 Incidents 2010

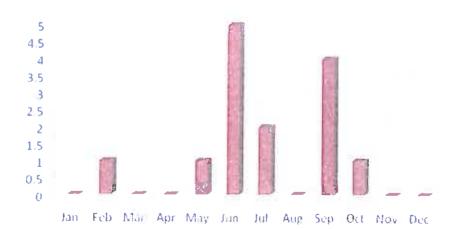
Disprisor	on Description	Insident Reported	Maria Joseph
		Fax to the EPA on the	Report to the
	Exceedance on FW 2 in	27.05.10 (44-	EPA (44-
11	Q2	2/10/EPA/DD/18)	2/10/EPA/DD/19)
		Fax to the EPA on the	Report to the
	Exceedance on SW in	08.10.10 (44-	EPA (44-
2	Q3	2/10/EPA/DD/32)	2/10/EPA/DD/33)
		Fax to the EPA on the	Report to the
	Exceedance on FW1 in	03.12.10 (44-	EPA (44-
3	Q4	2/10/EPA/DD/36)	2/10/EPA/DD/37)
		Fax to the EPA on the	Report to the
	Exceedance on SW in	10.01.11 (44-	EPA (44-
4	Q4	2/11/EPA/DD/01)	2/11/ EPA/DD/02)

11.2 COMPLAINTS

Complaints were reported either directly to the EPA or to Thorntons Recycling Centre during 2010. Figure 10 shows the breakdown of complaints by the month in 2010. There were a total of 14 complaints received during 2010. This is a reduction of 44% on the reporting period of 2009 and is the lowest number of complaints in a single reporting period for the facility.

Figure 10 Break down of all complaints 2010 by month

Complaints per month in 2010



Analysis of the complaints during 2010, shows that 13 complaints were received in relation to odour and 1 was in relation to vermin. Four of the complaints although received and investigated by Thorntons Recycling were not in any way attributed to the site as the complainants detailed that the smell they detected was of burning rubbish, on

two occasions and the other two was for vermin and odour not related to the site. These complaints cannot be attributed to the operation of the Killeen road facility, but they are included in the above reported figures as the complaint was made to the site.

PTWDL have worked very closely with the EPA and local residents over the past six years to try and find the best possible solution for odour control at the facility. We believe that odour abatement has been successful at the facility in 2010. As you can see from Figure 11 there has been an overall dramatic reduction in the number of complaints received from residents and businesses. Further mitigation works were completed in 2010 which included a complete change of activated carbon in the odour abatement system on the 26th June 2010. This was purposely changed ahead of schedule to ensure that there was maximum clean un-used carbon available for the warmer summer months.

As discussed in section 5.4 on odour assessment by an independent body has been carried out on our odour treatment system which proves that the system is working effectively and we are not having any negative impact on residents and that the odour problem at the facility is being managed effectively.

Annual Complaints

100
80
60
40
20
0
2003 2004 2005 2006 2007 2008 2009 2010

Figure 11 Complaint trends from 2004-2010

Thorntons Recycling takes every complaint seriously and is committed to resolving all complaints to the facility. We feel that in 2010 we have done our utmost to be proactive in dealing with local complaints and we aim to continue this positive trend of having a decrease in the number of complaints during 2011.

12 REVIEW OF NUISANCE CONTROL

Potential generic nuisances at waste transfer and recycling facilities include dust, noise, odour, litter, birds, rodents, traffic. PTWDL do their utmost to control any nuisances which may occur at the facility. Checks on nuisances are carried out daily and corrective actions are carried out as required. A procedure in line with our IMS has been designed to ensure housekeeping is maintained in all areas and is carried out by supervisors (EP08 – Housekeeping Inspections).

12.1 **DUST**

PTWDL are required to carry out dust monitoring three times per year. Results of the dust monitoring have being detailed in section 5.1 of this report. Thorntons Recycling staff use power hoses to wet down yard surfaces at the facility during dry periods, dust curtains have been fixed to entrances and exits of the buildings; a dust suppression system is in operation on in Building 2 and a superior dust system, RJP Pulse Plant, has been installed since March 2006 to remove dust from the air extracted from Building 3. PTWDL have a road sweeper on site at the Killeen Road at all times and it is used twice daily in the facility. This is also used on the Killeen Road and Kylemore Park North to assist in reducing dust levels due to passing traffic and contributory factors.

12.2 NOISE

Noise monitoring surveys are conducted annually at the facility; see section 5.3 of this report.

12.3 ODOUR

Tipping of waste and subsequent segregation and processing occurs within fully contained buildings which assist in preventing odours from escaping beyond the facility boundary. All putrescible waste is removed from the facility within 48 hours. An Odour Abatement System was installed in March 2005 which uses carbon filtration to extract and treat the molecules that cause odorous air. Further works such as sealing all buildings with polyutherane foam, the installation of an air curtains system and the installation of a pulse plant for dust extraction to improve operation efficiency of the Odour treatment system were also carried out since this time. Complaints to the facility have reduced dramatically since 2004 as show in section 11.2 of this report.

PTWDL have submitted odour progress reports to the Agency throughout 2010 and are confident that we have solved any alleged odour problem from the facility; we will continue to maintain the system and keep the EPA informed of same.

12.3 LITTER

Daily checks are carried out on litter within and around the site boundary any litter which may escape is cleared up as soon as is possible. All waste transportation vehicles are either enclosed or have a net which covers waste, preventing littering while waste is in transit. Thorntons Recycling owns and operates a road sweeper which sweeps inside and around the facility twice daily. All staff sweep and tidy picking areas constantly throughout the day and night and daily housekeeping checks are carried out by supervisors in all areas with further checks being carried out by the environmental department on a daily basis. All housekeeping checks are maintained on file in the Environmental Department at Thorntons Recycling Centre.

12.4 BIRDS

Constant moving machinery generally deters birds from causing any problems on site. However during 2010 an additional pest control was carried out to eradicate pigeons at the site. The situation is being monitored and if necessary further action by the contracted pest control company will be arranged.

12.5 RODENTS

Complete Pest Control conduct fortnightly checks of all bait points around the facility which effectively controls rodents at the facility, all documentation for site visits and reports are maintained on site.

12.6 FLIES

Flies have not been a problem at the facility during 2010. During 2010, new fly control units were erected in the dry recycling building and staff was informed on the most effective measures for reducing fly numbers. Both these measures combined helped ensure that fly numbers were controlled at a minimum and that no fogging was necessary.

12.7 TRAFFIC

Thorntons Recycling Centre is bordered to the West of the facility by the busy Killeen Road which has an access entrance into Park West Industrial Estate and is bordered to the North of the facility by Kylemore Park North, both locations receive a considerable amount of traffic

13 FINANCIAL PROVISIONS, MANAGEMENT STRUCTURE, PROGRAMME FOR PUBLIC INFORMATION

FINANCIAL PROVISIONS

PTWDL is insured by FBD Brokers (Appendix 7). PTWDL is insured for Employers Liability, Public/Products Liability and Motor Insurance and has also taken out a Pollution Insurance Policy. PTWDL is a financially secure company which is evident from the director's report and consolidated financial statements for the year ended 31st December 2009.

The company also have employed environmental management staff to ensure best practice guidelines and compliance with waste licence W0044-02 is being adhered to. A comprehensive emergency plan exists for all facilities operated by the company and the company has maintained certification to Environmental Standard ISO 14001 across all its sites in 2010. Environmental risk assessments are updated as part of the impact and aspects register for ISO14001. The Environmental Aspects Register (PM01-F02) for Thorntons Recycling, Killeen Road facility is available for inspection on site. All staff are

trained in Health and Safety and Environmental Awareness at Thorntons Recycling Centre.

PROGRAMME FOR PUBLIC INFORMATION

Thorntons Recycling operates an open door policy at the facility and has carried out tours with journalists, Local Authorities and businesses in 2010. The environmental team have been actively involved in financing a number of local projects and carried out recycling workshops in schools, hospitals and Industrial and commercial businesses in 2010.

All new and existing clients are brought through our waste acceptance procedures on a daily basis and are supplied with information by sales representatives or call centre agents in relation to what waste types we can accept at the facility.

Thorntons Recycling ran an "Ask the Expert" day, where by John Gormley, Minister of the Environment was present to give a talk on "What the new food regulations means for business" to staff and major commercial customers of Thorntons Recycling. Gary Brady MD of Thorntons Recycling gave a talk on "What happens to your waste now and in the future and how Solid Recover Fuel and Organic Waste Technologies are diverting waste from landfill". Alan Gallagher, Operations manager of Croke Park Stadium, gave a talk on "The benefits of partnership with Thorntons Recycling top deliver green awareness initiative and a more sustainable stadium". On the day there were live presentations and demonstrations of ELV cars being crushed, shredding of confidential paper waste, tankers and drain CCTV surveys and the company food waste collection lorry. Expert staff in the various departments of Thorntons also had stands with information for customers and were present to answer any queries in relation to their business.

Thorntons Recycling Centre has also upgraded its website so customers can access information such as waste collection permit numbers and waste licences etc.. The company also launched a new on line skip ordering service skip service www.skip.ic

All information relating to activities carried out at Thorntons Recycling Centre is maintained on site. Public information is accessible at the site at all times or at the Office of Environmental Enforcement. Detailed Communications Procedures (PM04-Communications and EP01 – Communications Programme) has been implemented in our IMS and are used throughout the company.

MANAGEMENT STRUCTURE

Below details the current management structure relating to the Killeen Road site.

Paul Thornton Operations Director

Ted Moran Operations Manager

Mercedes Kavanagh Group Environmental Manager

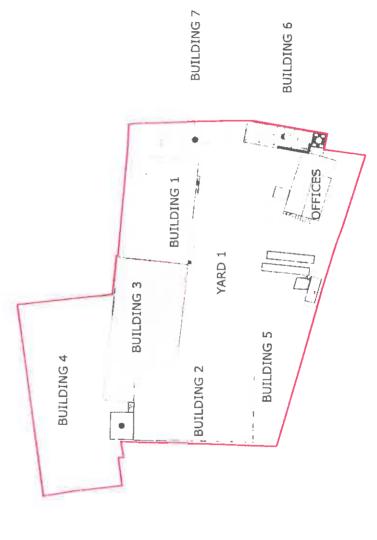
Yard Staff

David Duff Environmental Manager

14 FOUL WATER PRODUCTION AND VOLUME OF WATER TRANSPORTED OFF SITE

Thorntons Recycling Centre are limited under schedule C4 of waste licence not to emit more than 20m³ per day to the sewer at emission point reference F2 which exits at the north of the facility at Kylemore Park North or 12m³ per day to the sewer at emission point reference F1 which exits at the south of the facility to Kylemore Industrial Estate. A daily log is maintained on site.

Both foul meters located on F1 and F2 locations were calibrated on the 15th July 2008 and are checked during daily checks at the facility. Both are below the max permissible annual discharge for the reporting period. Both meters are scheduled for calibration in early 2011. Thorntons Recycling Tankering Services are used for all on site maintenance and can be called in the event of an emergency etc. Approximately 114,488 litres of foul water from drain maintenance was removed by tankers from the facility in 2010. Job tickets are located in the drain maintenance file in the Environmental Department, Killeen Road, Dublin 10.



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3	Materials Received	lan	Feb	March	Agen	May	June	Asse	Aug	Sapri	Oct	Nav	Dec	Total Year To Date	Average per Month
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	KCSH MMW Balling SITE 6	1656.92	1581 04	1048.52	1018 00	75.45								7185.86	653.26
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51	MANAY (CED);	1603.81	3758/14	H174.55	4631 87	5636 13	6253.08	1963.81	7680.20	24004F	60255.04	6717.92	3615.73	66971.08	6088 28
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	Clean Construction Rubbie						13.56						1989	153.20	13.93
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F	Soil and Stones	B8 891	18.80	11534	25 82	24.50	5.06	22/99	51,98	165.40	114.09	73.84		817.12	4.28
50	Bakers Waste	9元宗	98.74	54.80	38.240	33,88	94.96	(88/18)	90.14	(18-82)	1000	44,79	(97,64)	763 66	69 42
Ke	Non Infectious Realthcare Waste	518.62	502.38	04.489	585.10	554.40	582.67	490.25	664.38	69 969	860,300	730.82	674.65	7159.31	650 85
-	Tabacco	N.00	10.72		302.46	642		2.46	20.00	134				290.06	26.3
B	Unsultable food waste	35,80	4.89		10:01	8.20	20.70	0.32	35 35	(842)	00.20	1.84	10.90	171.66	15.61
3	Unsultable Alcohol and Liquid for Destruction			10 90		6.04							30.00	66.88	F 08
ne.	Mixed Dry Recyclables	1229.02	1214 83	1228.01	1177.43	896,89	977.3B	1012.59	DC 270	1188.54	1107.59	191917	1043.06	13159.27	1196 30
	Moteline Pephaping Aluminium	0.78		91-0		98'0			0.66			120	0.70	4 26	b£ 0
	WEEE Recycling		0.73		38.40	334	1.08	0.61	06.0					12.06	1 10
	Caruboned	20111	235.80	254 36	74 BZZ	212.44	243.54	212.21	272.32	266.74	\$1,662	296,10	224.78	2994 37	27.2.22
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-	Non Ferrace Metals	230		30%	2.28	2,552	3,20	11.82				47.58		63.76	5 8A
W	Ferrous Mixed Metals	23.16	13.76	585	州市	16.74	対策	8 58	12.46	14,00	8.54	2002	14.86	171.88	15.63
100	Wood Packaging	109 56	147.18	155 44	11872	62.32	124.64	94 58	109.18	MQ 804	104 84	114.28	62.34	1306.10	118 74
Table 1	Processed Wood a.g. chipped	7,34				7.02		1 28	5,20	3100	1.75	5.78	1.78	33.10	101
100	C & D Waste Wood	31.40	42.60	06,00	10.68	21.51	10.58	5.92	0.50	2.14	0.84			207 76	18.89
9	Wood Wests Manufacturing	7,08	664	7.68	0.74	3.16	9.18	3 72		14.94	3.86	3.78		60.78	5.63
2	Mixed Pinstia Bomes	3.98	3.10	3.78	3,88	2.90	4.50		14392	1,02	2.10	1.54	2.82	44.94	4 0 9
	Mixed Plustic Fifm	69.20	28/46	,98(3H)	38.84	26.26	43,76	State	0836		27:72	43.70	73.42	493.70	44 88
0	Mixed Hard Plastics	0.74	0.80	18.46	920		544		184	0.40	456	10.04		37.09	186
100	Glive	2.28		1.70	1.86	0.98	0.44	37.6	4.78	4728		C TEL	3.82	26.92	2.45
3	Brown Biru Seperately collected Food Run	1427,68	1203.90	1380,12	1830.58	1945.00	1975.84	1542.64	1063.60	1767.28	1585.10	1534.82	1024,73	19060 93	1734 63
Į.	Green Waste	148.75	4.92	12.24	25.72	光路的	20,72	66,461	30.42	0.000	16.44	32.06	111,56	390.77	38 52
1	Textiles / Clothes	15 66		16.00	1.02	88	21.38	1222	20.44	160	1.85	37.00	542	140.30	12.75
la a	ELV Tyrox								1.32			0.14		1.46	0 13
G	Products for Destruction - In organic	0.84		0.34	0.78	1.34		0.02				1.58		4.70	0.43
	Gypsum Products/Flasterboard		PI O		250						14.77	00.	26.	40.19	3.65
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THORNTONS RECYCLING CENTRE PLANT CAPACITY REPORT JANUARY 2011

INTRODUCTION

Thorntons Recycling Centre, Killeen Road, Dublin 10 is currently licensed under waste licence W0044-02 to accept 250,000 tonnes per annum of Domestic, Commercial, Industrial Non Hazardous and Construction Demolition Waste. To handle such large waste quantities efficiently and without significant environmental emissions, adequate plant machinery has to be in place to quickly handle and dispatch the materials delivered.

To quantify the processing capabilities of the facility this capacity report has been produced to estimate the quantities of waste the transfer station can currently accept before waste begins to accumulate and potentially effect the surrounding environment. This capacity report has identified spare plant that can be substituted for critical plant in the event of a breakdown. Furthermore, sufficient essential spare parts and staff who are capable of rectifying faults are also detailed and available to bring critical plant machinery back online after initial breakdown.

THORNTONS RECYCLING CENTRE PLANT CAPACITY

The following tables specify all plant on site and their individual capacity along with standby capacity of all substitute machinery (see tables 1, 2, 3)

Table 1 capacity of waste handling machinery

Area	Details	Machine	Capacity (tonnes per day)	Spare	Spare Capacity (tonnes per day)	Emergency Spare Parts In Store
Waste Handling	Handling Skip Waste (B2)	Fuchs 1	1500	Fuchs 6 (PDM)	1500	Yes
Waste Handling	Loading Trailers Oversize (B2)	Fuchs 2	1500	Fuchs 7 (Dunboyne)	1500	Yes
Waste Handling	Loading Baler (B3)	Fuchs 3	1500	CAT Fuchs – Spare between sites	1200	Yes
Waste Handling	Unloading trailers in the yard	Fork lift 1 (5 Tonne)	1000	Forklift 3 WEEE centre	1000	Yes
Waste Handling	Moving Cages at the CID line	Fork lift 2 (7 Tonne)	1000	Forklift 4 ELV centre	1000	Yes
Waste Handling	Forklift 4 - Clamps - loading trailers	Forklift with clamps (3 tonne)	1000			
Waste Handling	Loading trailers of recyclables and mainteance work	Teleporter 1	1000	Shovel 2 - JCB loading shovel	2000	Yes
Waste Handling	Teleporter 2 Dry Recyclables- loading the ballistic separator	Teleporter 2	1000	Shovel 3 & 4 Cat (PDM x 1,	4000	Yes
Waste Handling	Moving waste in waste reception areas at Killeen Road	Shovel 6 - Volvo L120	2000	Shovel 5 & 1 L90e (Dunboyne & Kilmainhamwood	2000	Yes
Waste Handling	Moving full and empty waste trailers	Shunter 1	1200 (* Based on 100 tonnes per hour for 12 hours)	Shunter 2	1200 (* Based on 100 tonnes per hour for 12 hours)	Yes
			12700		15400	

Table 2 Current Capacity of Waste Processing

TI	HORNTONS RECYCLIF	NG CENTRE	CURRENT DAI	LY PROCESSING	S CAPACITY	2011
Area	Details	Machine	Capacity (tonnes per day) Based on 12 hr day	Spare	Spare Capacity	Emergency Spare Parts In Store
Processing	C.I.D line- crusher, 2 x trommels, 2 x Nihots, flip flop and picking lines (12 hr day)	C.I.D line	720	Diversion of waste to another facility or work a 24 hours shift	Yes	Yes Motors, Belts and rollers
Processing	SRF Shredder(11 tonne / hour x 12 hours)	C.I.D line	132	No shredding, load material into artic trailer and re shred when operational	N/A	Yes, set of knives, set of drive belts and two stator bars
Processing	Recyclable baler (30 tonnes/hr x 12 hours)	Baler 2	360	Baler 1	Yes	Yes Motors, Belts and rollers

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Table 3 Current Capacity of Waste

Area	Details	Machine	Capacity (tonnes per day)	Spare	Spare Capacity	Emergency Spare Parts In Store
Transport	Moving waste to landfill - Loose Waste	10 Open Brown Trailers	(5 driver*4 lds * 20t per ld) 320	Spare Brown Trailers x 2	Yes	Yes
Transport	Moving SRF to outlet	3 Closed trailers	(1 driver*4ld 24t per ld) 96	Spare trailerX1	Yes	Yes
Transport	Moving Compostable waste	2 sealed trailers	(1 driver*3lds 22t per day) 66	N/A	N/A	N/A
Transport	Moving Wood to PDM	Open top Bulkers	(1 drivers*3 lds * 20t per ld) 60	N/A	N/A	N/A
Transport	Moving mixed metals	Open top bulkers	(1 drivers*2 lds * 16t per ld) 32	N/A	N/A	N/A
Transport	Moving Trommel Fines and Stones	2 rigid tipper trucks	(2 drivers*5lds*22t per ld) 220	N/A	N/A	Yes

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As can be seen from Tables 1, 2 and 3 Thorntons Recycling has sufficient plant capacity to process above the current licence quantity of 250,000 tonnes per annum. Table 2 and 3 display current capacity of waste processing machinery and current capacity in transport, should the facility be required to handle more than that displayed in Table 2 and 3, hours of processing can be increased as the facility is licenced to operate under a twenty four hour licence and extra drivers and trailers could be hired to accommodate transport of materials.

PTWDL operates other facilities such as Thorntons Recycling PDM, Thorntons Recycling Dunboyne, Kilmainhamwood Composting, Thorntons Recycling ELV, Thorntons Recycling Security Shredding and Kylemore WEEE Centre on behalf of Dublin City Council. All these facilities have similar plant on site which can be used at Thorntons Recycling Centre Killeen Road if required.

PTWDL employs a maintenance team who are responsible for ordering and cataloguing all essential spare parts. The team consists of qualified fitters and electricians, who have their own maintenance workshop and service bay onsite at the Killeen Road facility. A state of the art garage has been developed in Park West Industrial Estate where a team of 11 are employed. The garage is equipped with all necessary specialized equipment and an emergency service vehicle for call out or to fix mechanical breakdowns. PTWDL have 24 hour access to Hose Doctor who can be on site within the hour to replace any damaged hydraulic fittings. Critical spares for the baler are pooled with other baling facilities in Dublin and are available as required.

CONCLUSION

It is apparent from the information supplied that the facility and its workings have sufficient capacity to handle the current tonnages permitted to enter the facility and indeed could handle an increase in tonnage if required.

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		Time Fran		Jun-11	Jun-11	Feb 11	Jun-11	April 1	Quarterly Review	Jun-11	11.unf	Jun-11	Feb-11	Feb 11	Dec-11	Dec-11	Mar-11	Jun-11	Apr-11
PM03- F01 Management Programme 2011		Westrad	MENTAL	1 MCC planning received Feb 2010 2 ABP Appeal lodged March 2010 3 Lodged ficence with EPA in Mary 2010	Kernamharrwood landscape plan to be completed as part of the new expersion.	1 Sznaadean Appointed	1 Plennang Lodged 2 Permit lodged	1. Attach dust curtains	* Energy Study completed in 2010 2. Recommendations from study to be implemented on all sales	Assess developments of additional malerial to the line and new additions, mortlor quality and report	1 Organise groups for fours of Kileen Road - Presentations to groups on different wasta types etc. 2 Training to incoparate the importance of albanton to debard on WinNS allow auxil how errors affect business and and up as credit notes.	1 Review paperwork in trucks in line with national permut	1 Renewal at Permit notity DCC in Feb 2011	1 Complete Environmental Review of Licence and side issues	1 Complete Erretonmental Review of Gundance files and Erwtonmental Laga Regalar. Required for internal communications and ISO14001 register	1 IMS in place review and ensure all procedure, policies and plans are up to date. 2 Management Review to be completed on BMS for 2010.	1 Complete review to the files for 2010 on sits on Review of the permit conditions	1 Revise and udate the previous energy sudd 2 Update the energy register 3 Incorporate the energy register into the Objectives and impate.	Meet DCC re planning and premit Permit application Internal completed and lodged
Wanagem	CHOHNO	Responsibility	ENVIRONMENTAL	TWCDAMF	TIMCD	TAKED	MK	00	MKCDO	MKVDD	MK/DD Killeen Road	DDAMK	MK	MK	MK	MAKADID	99	00	MK
A03-F01		Louetlan		Kensenhamwood	Кипантівнтичоск	Kmamhamwood	POM	Killeen road	All Sites	Kilkeen road	Head Office		Shredding		All Sites	Ali Siles	E,V	Kaleen road	Technec Building
Vd	CARRY FORWARD FROM 2010	Objective and larges	THE PERSON NAMED IN			Upgrade of odour system and system and system of an acid scrubber to smitrove efficiencies - investigate possibility of scrubber etc.		_	y Systems/ Natural Resource umption - Management ms	SRF Development	Waste Acceptance Procedures - It Training Refresher for staff	Waste Collection Permit - Fleet audid All Sites	Shredding Permul	Dunboyne - Rewew of Environmental Dunboyne Files on side	Envronmental Guidence File for all I	relopment - successfully peas fination europe audits for 31	ELV. Review of Environmental files on sele	Carry out an updated energy audit on Killeen road and incorporate the findings into the Objectives and tragets	Development of new site for Masd Dry recyclables - Techrec building
		Type			Erwronmenial	Errefrontmental	Environmental	Envioomental	Emercal	Enveronmental	ដូព្ទេសលាកាមានៅ	Environmental	Envronmental	Emeronmental	Engrandita	Emtonmental	Emerconnental	Environmental	Environmental
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	COMPLETED	Red Date		EP 01	EP 02	EP 03	EP 04	EP 05	EP 06	EP 07	EP 08	EP 08	EP 10	EP 11	EP 12	EP 13	EP 14	EP 16	EP 17

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15 July 2010

Re Padraig Thornton Waste Disposal Ltd and Thornton Recycling Centre Ltd

Lo Whom It May Concern.

The list is confirm that we all as instruments for wire first on the light and that we carried a hold the following ocyars in plantion for in both to

Employers Liability

Covering the legal wants of the Insured to conjugues for death or bedity injury or discuss, arising out of and in the course of their employment by the losured in the trustness as described (Waste Collection, Recycling and Disposal and Property Owners) during the period of insuran.

FPD pti 00433053 04 01 Policy No. Renewal Date 1 July 2011

Limit of Indemnity

6 to 000 000 any one occurrence influeive of all costs and expenses

Public / Products Liability
Overing the legal facility of the Insurind for acceleration day injury to their party persons or accident indamage to third party material projectly analog in connection with the trusiness and subject to the limit of indemnity specified including fegal liability unsing out of goods sold or supplied.

FBO plu Insurers 00433053 04 01 Policy No Renewal Date: 1 July 2011

Limit of Indemnity Public Liability €2 600 000 any one accident Products Liability €2 600 000 any one period

Covers the insured's Liability to Third Parties for volucies tising use that, innection with the insured's basiness. Personal Injury cover is unumfied and Third Party Property Demonstrant is \$1,300,000 and \$30,000,000 for

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Excess Public/Products Liability Motor TPPD and Employer's Liability

insurers. ...(3 Policy No Renewal Date 1. July 2:11

Limit of Indemnity

Increases the undarlying limits up to a maximum of £12.5m. £6.5m and £20m resp., lively Cover fell has the underlying policy and is subject to Insurers policy terms and conditions. All policins include Indemnity to Principals Clause applies to all policies.

We trust that this is in order but if you require further distails, pluses du not be siture to contact the contact the

Yours Since they 111 Fergal Botton Service Exercitive



Guidance to completing the PRTR workbook

AER Returns Workbook

REFERENCE YEAR 2010

1. FACILITY IDENTIFICATION
Perent Company Name Federag Thomton Wassa Disposal Limited
Facily Name Thomton's Recycling Centre
PRTR identification Number W0044
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