

Attachment C

Management of the Facility

Attachments in this Section include:

- C.1 Management Structure
- C.2 Environmental Management Systems
- C.3. Hours Of Operation

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Attachment C.1: Technical Competence and Site Management

Mr. Patrick O'Toole has acted as Manager of the facility since the commencement of its operation in 2004. Mr. O'Toole has FÁS FETAC Certificate in Waste Management Course as well as eight years experience in the composting and waste industry. Figure 1 outlines key staff involved with the operation of the facility.

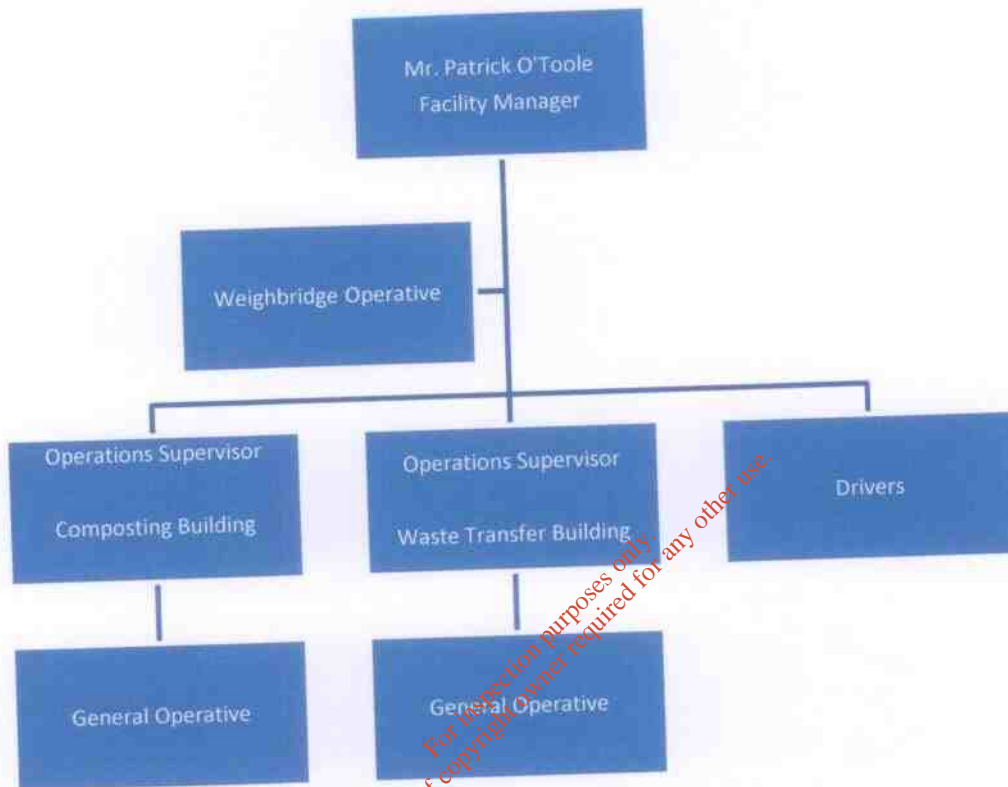


Figure 1 Staff Structure at the Facility

Attachment C.2: Environmental Management System

An Environmental Management System has been developed for the facility in accordance with Condition 2 (i) of Waste Facility Permit number WFP-CW-10-0003-01.

The EMS comprises of a number of environmental management procedures and environmental management system forms. An EMS Manual has also been established by OTCL. The manual includes the environmental policy, a register of environmental aspects and impacts, legal register, environmental objectives and targets,

The following list of documents from the EMS:

List of Procedures:

EMP001	Corrective Action Procedure
EMP002	Training Procedure
EMP003	Communications Procedure
EMP004	Maintenance Procedure
EMP005	Waste Acceptance, Handling & Rejection Procedure
EMP006	Emergency & Incident Response Procedure
EMP007	Complaints Procedure
EMP008	Weekly Inspection Procedure

List of Record Forms:

EMF001	Weekly Inspection Sheet
EMF002	Waste Permit Record Form (Waste In)
EMF003	Waste Permit record Form (Waste Out)
EMF004	Waste Permit Record Form (OTC Permits)
EMF005	Corrective Action Form
EMF006	Environmental Training Record Form
EMF007	Environmental Complaint Form
EMF008	Environmental Incident Reporting Form
EMF009	Waste Acceptance Form
EMF010	Maintenance & Calibration Programme/Record
EMF011	Vermin Baiting Record
EMF012	Scrubber Filters Cleaning Record
EMF013	Nuisance Inspections
EMF014	General Cleaning Form
EMF015	Drainage System Inspection Form
EMF016	Bund Inspection Form
EMF017	Rejected Material
EMF018	Biofilter Inspections
EMF019	Bio-filter Monitoring

A copy of all EMS documentation is included as part of this attachment.

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM



WEEKLY INSPECTION SHEET

Date: 10 March 2009

Ref: EMF001

Revision No: 0

Authorised by: Patrick O'Toole

Week commencing _____

1. BIOFILTER

Check condition and depth of biofilter: The biofilter shall be examined to ensure that no channelling is evident, and that moisture content is adequate. Watering, turning, restructuring and the addition of supplementary bed materials, or total bed replacement shall be carried out, as required, subject to bed performance (waste permit ref Schedule 4, Table 7).

Item	Date	Satisfactory? (* or ✓)	If '*' Detail further action taken*	Date further action completed
Biofilter condition				
Biofilter depth				

2. WASHDOWN OF RECEPTION AREAS

The reception areas shall be cleaned and washed down at least weekly, with the wash water being diverted for recovery or safe disposal. A log of such wash downs shall be maintained (waste permit ref 4.6.2)

Item	Date	Satisfactory? (* or ✓)	If '*' Detail further action taken*	Date further action completed
Waste reception area washdown				

3. DRAINAGE SYSTEM

The drainage system, bunds, silt traps and oil separators shall be inspected weekly, desludged as necessary and properly maintained at all times. All sludge and drainage from these operations shall be collected for safe disposal. A written record shall be kept of the inspections, desludging, cleaning, disposal of associated waste products, maintenance and performance of the interceptors, bunds and drains (waste permit ref 3.14.1)

Item	Date	Satisfactory? (* or ✓)	If '*' Detail further action taken*	Date further action completed
Drainage system check				

4. BUNDING

(waste permit ref 3.14.1, as above)

Item	Date	Satisfactory? (* or ✓)	If '*' Detail further action taken*	Date further action completed
Diesel tank bund check				
Moveable bunds check				

* attach certificate of disposal if applicable

ENVIRONMENTAL MANAGEMENT SYSTEM FORM



WASTE PERMIT RECORD FORM (WASTE IN)

Date: 10 March 2009

Ref: EMF002

Revision No: 0

Authorised by: Patrick O'Toole

This form is used to record details of the waste collection contractors that bring waste to OTC's site.

Name	Waste Permit Ref	Waste types collected	Date of expiry/review
Advanced Environmental Solutions -AES	WCP/KK/076(A)/05	20 01 08/19 12 12	17/1/09
Christy Lucey (Transport) Ltd.	WCP/LK/162/07(C)	20 01 08	9/8/09
Clean Ireland Recycling	WCP/LK/073/04(B)	20 01 08/19 12 12	19/9/09
Eoin Gavin	WCP/LK/152/07(C)	20 01 08/19 12 12	11/10/09
Greenguard Recycling	CP D95/1	20 01 08	03/06/10
KWD	WCP/LK/072/07(d)	20 01 08	23/12/10
Macroom Haulage	WCP/KK/300/05	20 01 08	29/6/09
Murray Waste	WCP/KK/301(A)/08	20 01 08/19 12 12	20/03/10
Mr Binman Ltd.	WCP/KK/070(A)/08	20 01 08/19 12 12	16/01/10
Oxigen	WCP-DK-08-1106-01	20 01 08/19 12 12	12/1/2014
Millstream Power Ltd.	CP D522/4A	02 03 04	11/9/08

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

WASTE PERMIT RECORD FORM (WASTE OUT)



Date: 10 March 2009

Ref: EMF002

Revision No: 0

Authorised by: Patrick O'Toole

This form is used to record details of the waste recovery and disposal sites that OTC sends it's processed waste and recyclables to, including details of contractors who take waste from OTC to these sites.

Name	Type	Waste Permit / License Ref	Waste types accepted	Date of expiry/revision	Waste Facility acceptance letter - date
Carlow County Council - Powerstown Landfill	Disposal facility	Waste Licence WL0025-02	Commercial waste: 20 03 01	N/A	17 th July 2008
Carlow County Council - Powerstown Landfill	Disposal facility	Waste Licence WL0025-02	Compost & C&D for cover material	N/A	24 th February 2008
Danelle Recycling Ltd	Recovery Facility	Waste Facility Permit WP01/08	Dry recyclables 15 01 01, 15 01 02	18 th April 2011	open
Glassco Recycling	Recovery facility	Waste permit 247/2006	Glass: 17 02 01, 15 01 03, 20 01 03	20 th June 2009	13 th January 2009
Returnbatt Ltd.	Collector/ Recovery facility	Waste Permit 97/2002A & WCP/KK/001(A)/07	15 01 01, 160602, 160603, 160604, 160605	10 th July 2009	15 th January 2009
WEEE Ireland	Recovery facility	N/A- ministerial approval	WEEE	N/A-	open
TDRL	Collector for WEEE Ireland	WCP/DC-08-1130-01	WEEE	19 th March 2014	See WEEE Ireland WA
A1 Metals	Collector/ Recovery facility	WCP/KK/458/08-ATFWMP 007D	Metals - 20 01 40	3 rd March 2010	25 th February 2009
Kieran Mooney - Waste Tyre Collection Service	Collector	WCP/KK/386/07	Tyres 16 01 03	23 rd March 2009	26 th February 2009
East Galway Waste	Disposal	WR/11-3	16 01 03	26 th Feb 2010	23 rd April 2009
Murray Waste Ltd.	Recovery	WP/08/23	200301, 191212, 150106	27 th January 2014	13 th March 2009
Greyhound Recycling	Recovery	EPA W0205-01	19 05 01, 191212		24 th March 2009

ENVIRONMENTAL MANAGEMENT SYSTEM FORM

WASTE PERMIT RECORD FORM (OTC PERMITS)



Date: 24 March 2009

Ref: EMF004

Revision No: 0

Authorised by: Patrick O'Toole

This form is used to record details of OTC's waste collection permits and waste facility permit.

Type of permit	Issuing Authority	Ref no.	Date of expiry/review
Waste Collection Permit (Cork)	Cork County Council	CKWMC326/05	22 nd September 2010
Waste Collection Permit (Dublin)	Dublin City Council	762/5	1 st December 2007
Waste Collection Permit (Kildare)	Kildare County Council	WCP/KE310C/07C	27 th February 2010
Waste Collection Permit (South East Region)	Kilkenny County Council	WCP/KK/283(A)/07	17 th December 2009
Waste Collection Permit (Wicklow)	Wicklow County Council	WCP/WW/306/05A	29 th August 2009
Waste Collection Permit (Limerick, Clare, Kerry)	Limerick County Council	WCP330 05b	24 th January 2008
Waste Collection Permit (Midlands)	Offaly County Council	WCP/KE310C/07C	30 th June 2010
Waste Facility Permit	Carlow County Council	WP 01/07	3 rd August 2010

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

CORRECTIVE ACTION FORM



Date: 30 March 2009

Ref: EMF005

Revision No: 0

Authorised by: Patrick O'Toole

This form is used to record details of non conformances related to OTC's activities. A non conformity is non-fulfilment of a requirement of the environmental management system, the waste facility permit or the waste collection permits held by O'Toole Composting.

N/C reference number: NC

Name of person who identified the non conformance (if applicable)

Details of Non conformance

Proposed corrective/preventive action *(to make sure that the problem does not recur)*

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Responsibility *(for implementing the corrective action)*

Proposed completion date

Notes/follow-up *(was the corrective action implemented as above? Are any changes required to other EMS docs?)*

Closed off? (check box when complete)

Date:

ENVIRONMENTAL MANAGEMENT SYSTEM FORM

ENVIRONMENTAL TRAINING RECORD FORM



Date: 30 March 2009

Ref: EMF006

Revision No: 0

Authorised by: Patrick O'Toole

This form is used to plan environmental training needs for O'Toole Composting staff and also to record when the training has been carried out.

Name	Training need	Proposed date	Training Completion Date	Signature
Patrick O'Toole	FAS Waste Management Training Programme			
	Environmental Awareness Training			
	Spill kit training			
	EMS Procedure training			

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

ENVIRONMENTAL TRAINING RECORD FORM



Date: 30 March 2009

Ref: EMF006

Revision No: 0

Authorised by: Patrick O'Toole

Name	Training need	Proposed date	Training Completion Date	Signature
Donal O'Toole	FAS Waste Management Training Programme			
	Environmental Awareness Training			
	Spill kit training			
	EMS Procedure Training			

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

ENVIRONMENTAL TRAINING RECORD FORM



Date: 30 March 2009

Ref: EMF006

Revision No: 0

Authorised by: Patrick O'Toole

Name	Training need	Proposed date	Training Completion Date	Signature
Site operatives	Environmental Awareness Training			
	Spill kit training			
	EMS Procedure Training			

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

ENVIRONMENTAL TRAINING RECORD FORM



Date: 30 March 2009

Ref: EMF006

Revision No: 0

Authorised by: Patrick O'Toole

Name	Training need	Proposed date	Training Completion Date	Signature
Driver	Environmental Awareness Training	27-30 April '09		
	Spill kit training	27-30 April '09		
	EMS Procedure Training	27-30 April '09		
	Waste Collection Permit Requirements	27-30 April '09		
	Driver CPC	Oct 2009		

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

ENVIRONMENTAL TRAINING RECORD FORM

Date: 30 March 2009

Ref: EMF006

Revision No: 0

Authorised by: Patrick O'Toole



Name	Training need	Proposed date	Training Completion Date	Signature
General Operative & Driver Help	Environmental Awareness Training	Nov 9-13 '09		
	Spill kit training	Nov 9-13 '09		
	EMS Procedure Training	Nov 9-13 '09		
	Waste Collection Permit Requirements	Nov 9-13 '09		

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

ENVIRONMENTAL TRAINING RECORD FORM



Date: 30 March 2009

Ref: EMF006

Revision No: 0

Authorised by: Patrick O'Toole

Name	Training need	Proposed date	Training Completion Date	Signature
Administration	Environmental Awareness Training			
	Spill kit training			
	EMS Procedure Training			
	Waste Collection Permit Requirements			

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

ENVIRONMENTAL COMPLAINT FORM



Date: 30 March 2009

Ref: EMF007

Revision No: 0

Authorised by: Patrick O'Toole

This form is used to record details of complaints related to OTC's activities. Including complaints made directly to the facility and via Carlow County Council.

Was complaint received directly or via Carlow County Council?	
<input type="checkbox"/> direct <input type="checkbox"/> via Council	
Name and address and contact no. of person who reported the complaint	Name of person recording complaint
Name:	
Address:	
Contact No:	
Time and Date of Complaint	
Details of Complaint <i>(what happened? Where did it happen? What caused it? Environmental impact/pollution?)</i>	
Response given to complainant	
Proposed corrective/preventive action <i>(to make sure that the problem is resolved and does not recur)</i>	
Responsibility <i>(for implementing the above actions)</i>	
Proposed completion date	
Notes/follow-up <i>(was the corrective action implemented as above? Are any changes required to other EMS docs?)</i>	
Closed off? (check box when complete) <input type="checkbox"/> Date:	

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

ENVIRONMENTAL INCIDENT REPORTING FORM

Date: 30 March 2009

Ref: EMF008

Revision No: 0

Authorised by: Patrick O'Toole



This form is used to record details of emergency situations/incidents related to OTC's activities.

NOTIFY ENVIRONMENT SECTION OF CARLOW COUNTY COUNCIL ASAP – NO LATER THAN 10AM THE FOLLOWING WORKING DAY AFTER THE INCIDENT

SUBMIT THIS FORM TO ENVIRONMENT SECTION OF CARLOW COUNTY COUNCIL NO LATER THAN 5 WORKING DAYS AFTER THE INCIDENT

Name of person who identified the incident
Time and Date of Incident
Details of Incident <i>(what happened? Where did it happen? What caused it? Environmental impact/pollution?)</i>
Measures put in place to minimise emissions/malfunctions & their effects <i>(e.g. spill kit used)</i>
Proposed corrective/preventive action <i>(to make sure that the incident does not recur)</i>
Responsibility <i>(for implementing the above actions)</i>
Proposed completion date
Notes/follow-up <i>(was the corrective action implemented as above? Are any changes required to other EMS docs?)</i>
Closed off? (check box when complete) <input type="checkbox"/> Date:

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

MAINTENANCE & CALIBRATION PROGRAMME/RECORD



Date: 30 March 2009

Ref: EMF010

Revision No: 0

Authorised by: Patrick O'Toole

This form is used to record details of routine maintenance and calibration carried out at OTC's site.

Equipment	Description of maintenance	Contractor (if applicable)	Frequency	Date completed
Tunnel Fan 1	Grease Bearings		Monthly	11-4-09
Tunnel Fan 2	Grease Bearings		Monthly	11-4-09
Tunnel Fan 3	Grease Bearings		Monthly	11-4-09
Maturation Fan	Grease Bearings		Monthly	11-4-09
Scrubber Fan	Grease Bearings		Monthly	11-4-09
Tunnel Fan 1	Thermography inspection of motor	Killerig Engineering	6 Months	28-11-08
Tunnel Fan 2	Thermography inspection of motor	Killerig Engineering	6 Months	28-11-08
Tunnel Fan 3	Thermography inspection of motor	Killerig Engineering	6 Months	28-11-08
Maturation Fan	Thermography inspection of motor	Killerig Engineering	6 Months	28-11-08
Scrubber Fan	Thermography inspection of motor	Killerig Engineering	6 Months	28-11-08
Main Electrical Panel	Thermography inspection of motor	Killerig Engineering	6 Months	28-11-08
Scrubber Pump	Lift & Clean		2 Months	26-2-09
Mechanic Filter Pump	Lift & Clean		2 Months	26-2-09
Sprinkler Pump	Lift & Clean		2 Months	1-4-09
Tunnel 1 Jets	Clean Jets and Flush Lines		2 Months	4-4-09
Tunnel 2 Jets	Clean Jets and Flush Lines		2 Months	4-4-09
Tunnel 3 Jets	Clean Jets and Flush Lines		2 Months	28-3-09
Biofilter Jets	Clean Jets and Flush Lines		2 Months	28-3-09
Scrubber Jets	Clean Jets and Flush Lines		2 Months	21-3-09
Scrubber Pump	Electrical Phase Test	Killerig Engineering	6 Months	20-1-09
Mechanical Filter Pump	Electrical Phase Test	Killerig Engineering	6 Months	20-1-09
Sprinkler Pump	Electrical Phase Test	Killerig Engineering	6 Months	20-1-09
Fresh Water Pump	Electrical Phase Test	Killerig Engineering	6 Months	20-1-09
Tunnel Temperature Probes	Certification	Bentley Instrumentation	12 Months	09-9-08

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ENVIRONMENTAL MANAGEMENT SYSTEM FORM

MAINTENANCE & CALIBRATION PROGRAMME/RECORD



Date: 30 March 2009

Ref: EMF010

Revision No: 0

Authorised by: Patrick O'Toole

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Bund Inspection Form (EMF 01)

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ENVIRONMENTAL MANAGEMENT SYSTEM PROCEDURE	
CORRECTIVE ACTION PROCEDURE	
Date: 30 th March 2009	Ref: EMP001
Revision No: 0	Authorised by: Patrick O'Toole



1. Purpose

Condition 3.10.2(c) of OTC's waste facility permit states "Corrective Action Procedures – The permit holder shall establish procedures to ensure that corrective action is taken should specified requirements of this permit not be fulfilled. The responsibility and authority for initiating further investigation and correction action in the event of a reported non-conformity with this permit shall be defined."

The purpose of this procedure is to meet the requirements of this Condition and explain how we:

Identify non-conformances against the EMS. A non conformity is non-fulfilment of a requirement of the environmental management system, the waste facility permit or the waste collection permits held by O'Toole Composting. They can potentially be identified by:

- o Internal site inspections
- o Person involved with the non conforming activity
- o Third party audits

Investigate the cause of non conformances

Implement corrective and preventive actions to ensure that the same problem does not recur.

2. Scope

This procedure relates to any non conformance identified in relation to the EMS.

There is a separate procedure for complaints (EMP008).

Examples of non conformances:

During an audit of the facility, County Council staff identify that a procedure has not been updated to reflect current practice.

During a site inspection, the Facility manager notices that a dust monitoring station has been vandalised and needs replacing.

3. Procedure

Non conformances may be identified by site staff or a third party.

All non conformances will be reported to the Facility Manager.

ENVIRONMENTAL MANAGEMENT SYSTEM PROCEDURE

CORRECTIVE ACTION PROCEDURE



Date: 30th March 2009

Ref: EMP001

Revision No: 0

Authorised by: Patrick O'Toole

The Facility Manager will be responsible for recording details of the non conformance on the Corrective Action Form (EMF005).

The Facility Manager will investigate the non conformance and will decide on what corrective actions are required to remedy the situation. He will also decide on what preventive actions are required to prevent the situation from recurring.


If any changes to procedures are required as a results of the corrective actions the Facility Manager will ensure that these changes are made and that training in the new procedures is carried out.

The current status of all corrective actions required will be reviewed by the Facility Manager on a monthly basis.

4. Records

Corrective Action Form EMF005

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ENVIRONMENTAL MANAGEMENT SYSTEM PROCEDURE		
TRAINING PROCEDURE		 <small>organic & food waste recycling</small>
Date: 30 th March 2009	Ref: EMP002	
Revision No: 0	Authorised by: Patrick O'Toole	

1. Purpose

To ensure that any person(s) performing tasks for it or on behalf of O'Toole Composting which have the potential to cause a significant environmental impact(s) is competent on the basis of appropriate education, training or experience.

Condition 3.9 of OTC's Waste Facility Permit states:

"The permit holder shall employ a suitably qualified and experienced facility manager who shall be designated as the person in charge. The facility manager or a nominated, suitably qualified and experienced, deputy shall be present on the facility at all times between the hours specified in Condition 1.7 unless otherwise agreed by the Council.

Both the facility manager and deputy, and any replacement manager or deputy, shall successfully complete the FÁS waste management training programme or equivalent agreed by the Council".

Condition 3.10.2 (d) also states:

Awareness and Training Programme – The Awareness and Training Programme shall identify training needs, for personnel whose work can have a significant effect upon the environment. Appropriate records of training shall be maintained.

2. Scope

This Procedure applies to all training required in relation to O'Toole Composting's Operations.

3. Procedure

The following training may be required as part of the EMS:

- Environmental Awareness Training
- Job-specific Environmental Training

3.1. Environmental Awareness Training

Environmental Awareness Training was provided to all staff and key contractors during the implementation of the EMS to inform them of the following:

the importance of conformity with the environmental policy and procedures and with the requirements of the environmental management system,

the significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance,

ENVIRONMENTAL MANAGEMENT SYSTEM PROCEDURE



TRAINING PROCEDURE

Date: 30th March 2009

Ref: EMP002

Revision No: 0

Authorised by: Patrick O'Toole

their roles and responsibilities in achieving conformity with the requirements of the environmental management system, and

the potential consequences of departure from specified procedures.

Environmental awareness training is also provided to new staff within three weeks of their start date, by the Facility Manager.

3.2. Job-specific Training

Job specific training may be required to ensure that any person(s) performing tasks that have the potential to cause a significant environmental impact are competent on the basis of appropriate education, training or experience.

Each member of staff with specific roles and responsibilities have a training needs analysis undertaken on an annual basis by the Facility Manager.

4. Records

The Facility Manager has responsibility for ensuring that the following training records are maintained.

Environmental Training Record Form EMF006

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COMMUNICATIONS PROCEDUREDate: 30th March 2009

Ref: EMP003

Revision No: 0

Authorised by: Patrick O'Toole

1. Purpose

The purpose of this procedure is to describe how we meet the requirement of Condition 3.9.1 of our Waste Facility Permit, which states:

"The permit holder shall establish and maintain a Communications Programme to inform and involve the local community and ensure that members of the public can obtain information at the facility, at all reasonable times, concerning performance of the facility".

2. Scope

This procedure relates to communications regarding the activities at OTC's site in Carlow.

There is a separate procedure for complaints (Complaints Procedure EMP008).

3. Procedure

We have prepared a set of information that will be available for viewing by any interested party during site opening hours.

The information will be maintained and updated on a regular basis by the Administrative Officer will include the following information:

Environmental Management System Manual (includes Environmental Policy)

Annual Environmental Report for the previous year

Monitoring results for the current year

Safety Statement

Carlow County Council Audits / site inspection reports

Complaints and incidents forms

4. Records

Public information file (contains EMS Manual, AER, monitoring results, safety statement, Council audit reports)

Complaints file

Incidents file

MAINTENANCE PROCEDUREDate: 30th March 2009

Ref: EMP004

Revision No: 0

Authorised by: Patrick O'Toole

1. Purpose

The purpose of this procedure is to describe how we meet the requirement of Condition 3.10.4 of our Waste Facility Permit, which states:

"The permit holder shall establish and maintain a programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment. Appropriate record keeping and diagnostic testing shall support this maintenance programme".

"All treatment/abatement and emission control equipment shall be calibrated and maintained, in accordance with the instructions issued by the manufacturer/supplier or installer. Written records of the calibrations and maintenance shall be made and kept by the permit holder".

2. Scope

This procedure relates to all maintenance activities carried out at OTC's site in Carlow.

3. Procedure

A maintenance programme will be compiled at the start of every year and recorded on the Maintenance and Calibration Programme/Record Form EMF010. The completed form will be held in the Maintenance and Calibration file.

The maintenance programme will describe what has to be maintained and when. It will include the following and will be reviewed regularly to take account of changes at the site and changes to the waste facility permit.

- Washing and cleaning filters
- GICOM scheduled maintenance
- Cleaning air channels in composting tunnels
- Cleaning of floor pipes

When each item on the programme has been completed the facility Manager will enter details of the contractor who carried out the work and the date the work was completed. Supplementary information e.g. certificates of confirmation from contractors will be included in the Maintenance and Calibration File.

Details of routine cleaning and compost checks are recorded on the Waste Acceptance (Compost batches) form EMF009.

ENVIRONMENTAL MANAGEMENT SYSTEM PROCEDURE

MAINTENANCE PROCEDURE

Date: 30th March 2009

Ref: EMP004

Revision No: 0

Authorised by: Patrick O'Toole



4. Records

Maintenance and Calibration Programme/Record EMF010

Waste Acceptance form (compost batches) EMF009

Maintenance and calibration file

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**WASTE ACCEPTANCE, HANDLING & REJECTION
PROCEDURE**Date: 14th May 2009

Ref: EMP005

Revision No: 1

Authorised by: Patrick O'Toole

1. Purpose

Condition 5.2.1 of OTC's Waste Facility Permit states: "Prior to commencement of waste acceptable at the facility, the permit holder shall establish and maintain detailed written procedures for the acceptance and handling of wastes".

This procedure ensures that we only accept wastes permitted to be accepted at the facility and describes the actions to be taken if non conforming wastes are discovered.

2. Scope

This Procedure applies to all wastes accepted at O'Toole Composting. Wastes Permitted to be accepted are listed in Appendix 1.

3. Procedure**3.1. Customer information**

When an order is placed for a skip, the customer is informed by telephone that hazardous waste is not permitted in skips. The Administrative Officer has a list of examples of unacceptable wastes, which is read out to the customer.

Regarding compost customers, the sales representative provides all customers with a leaflet/poster explaining what can and cannot be composted.

3.2. Waste Acceptance and handling

When a load of waste arrives at the facility the **Weighbridge Operator** will:

Check source of waste.

Ensure waste is from a known customer.

Ensure waste is contained and is appropriately covered.

Where possible, visually inspect the material, before entry to facility.

If waste is acceptable driver proceeds to weighbridge.

The time of delivery and the detail of the vehicle and the waste will be recorded.

The following actions are then taken to record the details of the load:

Vehicle registration is recorded and entered into weighbridge system

WASTE ACCEPTANCE, HANDLING & REJECTION PROCEDUREDate: 14th May 2009

Ref: EMP005

Revision No: 1

Authorised by: Patrick O'Toole

Details of producer, haulier code, facility EWC Code and checked by name are entered

After weighing and inspection of documentation by weighbridge operator, driver is directed to the relevant processing building (depending on whether the load is skip waste for recycling or biodegradable waste for composting).

On arrival at the skip waste building or the composting building, a **Site Operative** will ensure:

Upon dismounting, the driver/operator is required to wear appropriate PPE.

The load shall be tipped in the Waste Intake Area.

The Waste will be pushed back to the Waste Inspection Area.

Unacceptable material will be removed to the Waste Quarantine Area.

The unloaded truck will be re-directed to weighbridge.

Following offloading of the waste the Weighbridge Operator will:

Weigh the empty vehicle

Give a copy of the weighbridge docket which will be given to the operator before exiting the Facility.

The green copy of the docket is kept in the ABPR file and the pink copy is retained for invoicing purposes.

All loads of waste are recorded in the Daily Waste Inwards Book.

3.3. Waste Rejection

Unacceptable waste is generally not found until it is offloaded. Where this is the case, the following will be carried out:

If during processing, further unacceptable waste is found within a load, this waste will be isolated and removed to the quarantine area for disposal. Details will be recorded in the Daily Waste Inwards Book, identifying the load and the nature of the problem.

The customer will be notified as soon as practicable of the subsequent difficulty with their material.

The Waste Rejection Form (EMF017) will be completed and maintained on file.

The non-conforming waste will be held in the designated waste quarantine areas until disposal can be arranged.

**WASTE ACCEPTANCE, HANDLING & REJECTION
PROCEDURE**Date: 14th May 2009

Ref: EMP005

Revision No: 1

Authorised by: Patrick O'Toole

Disposal records for all non conforming wastes will be held on file.

4. Records

The Facility Manager has responsibility for ensuring that the following records are maintained:

Computerised weighbridge system

Weighbridge dockets

Waste Rejection Form (EMF017)

Daily Waste Inwards Book

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ENVIRONMENTAL MANAGEMENT SYSTEM PROCEDURE

WASTE ACCEPTANCE, HANDLING & REJECTION PROCEDURE



Date: 14th May 2009

Ref: EMP005

Revision No: 1

Authorised by: Patrick O'Toole

APPENDIX 1: WASTES ACCEPTED BY O'TOOLE COMPOSTING

Composting facility:

EWC Number	Description
02 01 01	Sludges from washing & cleaning
02 01 02	Animal tissue waste
02 01 03	Plant tissue waste
02 01 05	Animal faeces, urine and manure (including spoiled straw), effluent,
02 01 07	Waste from forestry
02 02 01	Sludges from washing and cleaning
02 02 02	Animal tissue waste
02 02 03	Materials unsuitable for consumption or processing
02 02 99	Wastes not otherwise specified
02 03 01	Sludges from washing, cleaning, peeling, centrifuging and separation
02 03 04	Materials unsuitable for consumption or processing
02 03 04	Materials unsuitable for consumption or processing (of vegetable origin)
02 03 05	Sludges from on-site effluent treatment
02 03 99	Wastes not otherwise specified
02 04 03	Sludges from on-site effluent treatment
02 05 01	Materials unsuitable for consumption or processing (from dairy industry)
02 05 02	Sludges from on-site effluent treatment
02 06 01	Materials unsuitable for consumption or processing (from baking & confectionary)
02 06 03	Sludges from on-site effluent treatment
02 07 01	Wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	Wastes from spirit distillation
02 07 04	Materials unsuitable for consumption or processing
02 07 05	Sludges from on-site effluent treatment
03 01 01	Waste bark and cork
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer
03 03 01	Waste bark & wood
03 03 05	De-inking sludges from paper recycling
03 03 08	Wastes from sorting of paper and cardboard destined for recycling
03 03 11	Sludges from on-site effluent treatment other than those mentioned in 03 03 10
04 02 10	Organic matter from natural products (for example grease, wax)
04 02 20	Sludges from on-site effluent treatment other than those mentioned in 04 02 19
07 05 12	Sludges from on-site effluent treatment other than those mentioned in 07 05 11

ENVIRONMENTAL MANAGEMENT SYSTEM PROCEDURE

WASTE ACCEPTANCE, HANDLING & REJECTION PROCEDURE



Date: 14th May 2009

Ref: EMP005

Revision No: 1

Authorised by: Patrick O'Toole

EWC Number	Description
15 01 03	Wooden packaging
17 02 01	Wood
19 02 02	wastes not otherwise specified
19 06 06	Digestate from anaerobic treatment of animal and vegetable manure
19 08 05	Sludges from treatment of urban waste water
19 09 02	Sludges from water clarification
20 01 01	Paper and cardboard
20 01 08	Biodegradable kitchen and canteen waste
20 01 25	Edible oil and fat
20 02 01	Biodegradable waste (garden and park wastes)

Skip hire facility:

EWC Code	Description
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
17 01 07	Mixtures of concrete, brick, tile and ceramics (other than those mentioned in 17 01 06)
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastics
17 04 07	Mixed metals
17 05 04	Soil and stones other than those mentioned in 17 05 03
20 01 01	Paper & cardboard
20 01 02	Glass
20 01 10	Textiles
20 01 39	Plastics
20 01 40	Metals (cans)
20 01 38	Wood
20 03 01	Mixed municipal wastes (i.e. Skip waste from households)
20 03 07	Bulky waste

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EMERGENCY & INCIDENT RESPONSE PROCEDUREDate: 14th May 2009

Ref: EMP006

Revision No: 1

Authorised by: Patrick O'Toole


**Toole
Composting**
offering a local waste recycling
1. Purpose

To set out roles and responsibilities to be taken in the event of an emergency and/or incident at O'Toole Composting.

To provide guidance on actions to be taken in response to an emergency/ incident.

2. Scope

Emergency and/or incidents at O'Toole Composting's site in Carlow.

3. Definitions

Harmful substance – a substance either prohibited from being accepted or discharged to a receiving medium (atmosphere, ground or water) or a substance released in sufficient quantities to cause environmental pollution or damage.

Incident – As defined by the Waste Licence

An emergency:

- Any emission which does not comply with the requirements of the licence
- Any exceedance of the daily duty capacity of the waste handling equipment
- Any trigger level specified in the waste facility permit which is attained or exceeded
- Any indication that environmental pollution has or may have taken place

4. Responsibilities

It is the ultimate responsibility of the Facility Manager to ensure sufficient and appropriate measures are adopted and employed throughout the organisation to prevent the occurrence, and/or mitigate the effects, of environmental incidents.

The Facility Manager and/or Deputy are responsible for co-ordinating the response to an incident.

It is the responsibility of all persons to ensure that they comply with the provisions of this procedure so far as they relate to matters within their control.

EMERGENCY & INCIDENT RESPONSE PROCEDUREDate: 14th May 2009

Ref: EMP006

Revision No: 1

Authorised by: Patrick O'Toole

It is the responsibility of the Facility Manager to ensure that their nominated representatives who may be called upon to respond to an incident have had appropriate training and instruction.

It is the responsibility of the Facility Manager to ensure that any necessary equipment for dealing with incidents is available on site.

5. Procedure

5.1. Fire

If a fire is detected on site the alarm will be raised and the building is to be immediately evacuated. Drivers should turn off engines and leave vehicles parked safely.

The fire brigade should be contacted by dialling 999. Details of the incident shall be reported in accordance with the procedure outlined in Section 5.4 below.

An attempt should be made to fight small fires with the emergency equipment on site but only if it is safe to do so.

All dust/fire abatement sprinklers should be switched on.

All incoming traffic shall be diverted from the facility by the Weighbridge Operator.

No building shall be re-entered until the Fire Brigade or Facility Manager has informed personnel that it is safe to do so.

All fires shall be reported to the Facility Manager. Any emergency shall be treated as an emergency and therefore an incident.

Firewater retention:

The potential for a fire in external areas is considered to be very low, as waste is not handled or stored outdoors. The concrete base of the compost buildings provides for surface water and leachate control and containment and firewater retention.

In the event of a fire, firewater will be collected by the leachate or surface water collection system, depending on the area in which the firewater arises.

The leachate storage system has adequate capacity to retain firewater. In the event of a fire the leachate spraying system will be switched off in order to retain any firewater in the leachate collection system. The firewater will be held for testing. The results of the tests will be used to decide whether the firewater can be treated onsite in the leachate treatment plant, or whether the firewater will need to be tankered for offsite treatment.

EMERGENCY & INCIDENT RESPONSE PROCEDUREDate: 14th May 2009

Ref: EMP006

Revision No: 1

Authorised by: Patrick O'Toole

Valves will be fitted on end of storm pipes the end of July 2009. We have expandable pipe blockers on site to use in an emergency in the meantime.

Fire extinguishers are placed at several points around the facility and are maintained by an external contractor.

5.2. Breakdown of essential equipment

The breakdown of essential equipment is classed as an incident and should be reported in accordance with 5.2 below.

There are three potential types of breakdown - 'waste machinery and composting equipment breakdown', 'monitoring equipment breakdown' and 'pollution prevention equipment breakdown'

Waste Machinery and composting equipment

The facility will be fitted out with all the usual safety features relating to vehicles, visibility and general safety in the work place.

Composting tunnels: The primary method used to prevent overheating is the temperature feedback control of the blowers that is programmed to maintain the biomass temperature within defined limits.

In the event of a prolonged power cut, i.e. > 24 hours the tunnels will be emptied by loader. If duty capacity is almost reached waste shall be diverted to another composting plant or landfill without prior treatment and third party contractors shall be diverted from the facility.

Waste handling equipment: In the event of a breakdown of essential waste handling equipment the Facility Manager shall be informed immediately so an assessment can be made of the breakdown.

If after inspection the machinery/plant cannot be fixed within one hour by onsite engineers then a standby machine will be substituted to continue waste handling.

If after 24 hours the machine is still inoperable, waste shall be diverted to another composting plant or landfill and third party contractors shall be diverted from the facility.

If the duty capacity of the plant is exceeded then the breakdown will be treated as an incident. An incident recording form shall be filled in and submitted to the Facility Manager in accordance with the procedure in Section 5.4 below.

Water supply: Water is required to add to the compost to maintain optimum moisture levels. Water will be obtained from recirculation of surface water run-off and from the water supply well. In the event of a breakdown of the water pump or loss of power, the procedure for waste handling equipment above shall be followed.

Monitoring and Pollution Control Equipment

EMERGENCY & INCIDENT RESPONSE PROCEDUREDate: 14th May 2009

Ref: EMP006

Revision No: 1

Authorised by: Patrick O'Toole

In the event of a breakdown of essential monitoring and/or pollution control equipment the Facility Manager shall be informed immediately so an assessment can be made of the breakdown.

If after inspection the equipment cannot be fixed by onsite engineers If onsite engineers cannot fix or replace a part/unit then an outside contractor will be contacted by the end of the working day. The breakdown will be fixed within 48 hours.

5.3. Spillage

All significant spillages will be classed as incidents and reported in accordance with the procedure in 5.4 below.

The Environmental Manager and Health and Safety Officer are responsible for ensuring all spill kits are adequately stocked with pads, booms and other essential equipment.

It is the responsibility of all employees to ensure that they are familiar with members of the spill team and location of spill kits and cabinets. Training will be provided in this respect.

The Facility Manager is responsible in ensuring all liquids are stored in bunded areas and that all tanks and drums are labelled.

In the event of a spillage the Facility Manager will be notified immediately and the source of the spill shall be sealed off if possible.

The Spill shall be contained by sealing off the spill with containment booms; spill mats shall then be placed inside the booms to absorb the liquid.

If any spilled liquid enters or has the potential to enter the leachate collection system then the cut off valves shall be sealed to prevent any spill liquids entering the compost.

All significant spills shall be treated as an incident and the Emergency Response Procedure shall also be adhered to.

All contaminated adsorbent materials shall be collected and stored in a leak proof container.

The Facility Manager will organise for its safe removal by an authorised contractor.

5.4. Incident Reporting

A suspected or detected incident will be immediately reported to the Facility Manager or nominated representative.

The Facility Manager, or nominated representative, will take all reasonable measures to ensure that any release is contained within the site boundary and that harm to human

EMERGENCY & INCIDENT RESPONSE PROCEDUREDate: 14th May 2009

Ref: EMP006

Revision No: 1

Authorised by: Patrick O'Toole

health and the environment is minimised, both within and beyond the site boundary.

In the event of an incident occurring, the Environmental Manager, Operations Manager, or nominated representative, will take all reasonable measures to ensure that any environmental damage is appropriately remedied.

All significant spillages occurring at the facility shall be treated as an emergency and immediately cleaned up and dealt with so as to alleviate their effects.

No waste shall be burnt within the boundaries of the facility. A fire at the facility shall be treated as an emergency and immediate action shall be taken to extinguish it and notify the appropriate authorities.

In the event of an incident occurring on the facility The Facility Manager or nominated representative, or nominated representative shall immediately:

identify the date, time and place of the incident;

carry out an immediate investigation to identify the nature, source and cause of the incident and any emission arising there from;

isolate the source of any such emission;

evaluate the environmental pollution, if any, caused by the incident;

identify and execute measures to minimise the emissions/malfunction and the effects thereof; and

notify the Council as soon as practicable and in any case not later than 10.00 a.m. the following working day after the occurrence of any incident;

submit a written record of the incident (ref EMF00X), to the Council as soon as practicable and in any case within five working days after the occurrence of any incident;

Should any further actions be taken as a result of an incident occurring, the permit holder shall forward a written report of those actions to the Council as soon as practicable and no later than ten days after the initiation of those actions.

provide a proposal to the Council for its agreement within one month of the incident occurring to:-

- o identify and put in place measures to avoid reoccurrence of the incident; and
- o identify and put in place any other appropriate remedial action.

Out-of hours incidents: If an incident occurs outside of normal working hours, the person discovering the incident (e.g security firm or passer-by) would call the emergency

EMERGENCY & INCIDENT RESPONSE PROCEDUREDate: 14th May 2009

Ref: EMP006

Revision No: 1

Authorised by: Patrick O'Toole

telephone number on the Site Entrance Notice Board. The incident reporting procedure outlined above would then be initiated.

All contractors working at the site will be made aware of the contents of this procedure and be required to comply with its provisions.

6. Records

Environmental Incident Recording Form.

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COMPLAINTS PROCEDUREDate: 30th March 2009

Ref: EMP007

Revision No: 0

Authorised by: Patrick O'Toole


**Toole
Composting**
organic & food waste recycling
1. Purpose

The purpose of this procedure is to explain how we record details of complaints and take action to ensure the situation that led to the complaint is resolved.

This procedure has been written to meet the requirements of Condition 9.4 of our Waste Facility Permit.

2. Scope

This procedure relates to any non complaints received in relation to OTC's activities. They may be complaints received directly by the facility, or reported via the Environment Section of Carlow County Council.

3. Procedure

On receiving a complaint directly at the facility, a Complaint Record Form (EMF00X) will be completed.

Either the Weighbridge Operator, Facility Manager or Deputy Manager may complete the complaints form. The Weighbridge operator will have the responsibility of maintaining a file of complaints and ensuring they are followed up.

Details that are recorded on the form will be repeated to the complainant to make sure they are in complete agreement with the details of the complaint.

Where complaints are received via Carlow County Council, a Complaint Record Form will also be completed. Any accompanying correspondence from the Council will be attached to the complaint record form and held in the complaints file.

The following details will be recorded:

- date and time of the complaint;
- the name of the complainant;
- details of the nature of the complaint;
- actions taken on foot of the complaint and the results of such actions; and
- the response made to each complainant.

4. Records

Environmental Complaints Form EMF007

WEEKLY INSPECTION PROCEDUREDate: 14th May 2009

Ref: EMP008

Revision No: 0

Authorised by: Patrick O'Toole

**1. Purpose**

The purpose of this procedure is to describe how we carry out the weekly inspections that are required as Conditions of our Waste Facility Permit and Animal By-Products Certification.

2. Scope

This procedure relates to all weekly inspections required at O'Toole Composting.

3. Procedure

Weekly inspections are required for the following:

Biofilter inspections - Check condition and depth of biofilter: The biofilter shall be examined to ensure that no channelling is evident, and that moisture content is adequate. Watering, turning, restructuring and the addition of supplementary bed materials, or total bed replacement shall be carried out, as required, subject to bed performance (waste permit ref Schedule 4, Table 7).

Vermin baiting - bait traps set weekly

Scrubber filters cleaning - tunnel sprinklers, scrubber sprinklers and dirty water filters all require weekly cleaning

Nuisance inspections - presence of litter, odours, flies, vermin, dust, noise and mud are checked weekly, as required by Condition 7.10 of the waste permit.

General cleaning - The reception areas shall be cleaned and washed down at least weekly, with the wash water being diverted for recovery or safe disposal. A log of such wash downs shall be maintained (waste permit ref 4.6.2)

Drainage system inspections - The drainage system, bunds, silt traps and oil separators shall be inspected weekly, desludged as necessary and properly maintained at all times. All sludge and drainage from these operations shall be collected for safe disposal. A written record shall be kept of the inspections, desludging, cleaning, disposal of associated waste products, maintenance and performance of the interceptors, bunds and drains (waste permit ref 3.14.1)

Bund inspections form - (waste permit ref 3.14.1, as above)

Forms are available to record the results of each inspection. Inspections are carried out by the Facility Manager.

Where disposal of sludges or washwater is required as a result of cleaning, disposal records will be retained on file.

WEEKLY INSPECTION PROCEDUREDate: 14th May 2009

Ref: EMP008

Revision No: 0

Authorised by: Patrick O'Toole

 **Toole
Composting**
organic & food waste recycling**4. Records**

The following records are kept on file:

- Biofilter inspections form EMF001
- Vermin bating form EMF011
- Scrubber filters cleaning form EMF012
- Nuisance inspections form EMF013
- General cleaning form EMF014
- Drainage system inspections form EMF015
- Bund inspections form EMF016

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First Report

Description	Inlet	Outlet
Ammonia		
Mercaptans		
Hydrogen Sulphide		
Amines		

Checked by: _____ Date: _____

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Second Report

Description	Inlet	Outlet
Ammonia		
Mercaptans		
Hydrogen Sulphide		
Amines		

Checked by: _____ Date: _____

Monitoring Schedule
 A monitoring schedule is compiled on an annual basis to schedule the monitoring required by the facility's waste permit. The schedule for 2010 is as follows:

2011

JANUARY							FEBRUARY							MARCH						
M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S
						1	1	2	3	4	5	6	7	1	2	3	4	5	6	7
2	3	4	5	6	7	8	8	9	10	11	12	13	14	8	9	10	11	12	13	14
9	10	11	12	13	14	15	15	16	17	18	19	20	21	15	16	17	18	19	20	21
16	17	18	19	20	21	22	22	23	24	25	26	27	28	22	23	24	25	26	27	28
23	24	25	26	27	28	29								29	30	31				

APRIL							MAY							JUNE						
M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S
5	6	7	8	9	10	11	3	4	5	6	7	8	9	7	8	9	10	11	12	13
12	13	14	15	16	17	18	10	11	12	13	14	15	16	14	15	16	17	18	19	20
19	20	21	22	23	24	25	17	18	19	20	21	22	23	21	22	23	24	25	26	27
26	27	28	29	30			24	25	26	27	28	29	30	28	29	30				
							31													

JULY							AUGUST							SEPTEMBER						
M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S
5	6	7	8	9	10	11	2	3	4	5	6	7	8	6	7	8	9	10	11	12
12	13	14	15	16	17	18	9	10	11	12	13	14	15	13	14	15	16	17	18	19
19	20	21	22	23	24	25	16	17	18	19	20	21	22	20	21	22	23	24	25	26
26	27	28	29	30	31		23	24	25	26	27	28	29	27	28	29	30			
							30	31												

OCTOBER							NOVEMBER							DECEMBER						
M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S
4	5	6	7	8	9	10	1	2	3	4	5	6	7	6	7	8	9	10	11	12
11	12	13	14	15	16	17	8	9	10	11	12	13	14	13	14	15	16	17	18	19
18	19	20	21	22	23	24	15	16	17	18	19	20	21	20	21	22	23	24	25	26
25	26	27	28	29	30	31	22	23	24	25	26	27	28	27	28	29	30	31		
							29	30												

Biofilter Monitoring	Mar/Sept
Bi-annually - Ammonia, Microspitons, Hydrogen Sulphide & Arsenic in inlet and outlet gas	Mar/Sept
Bi-annually - pH, Ammonia, Total viable counts and Moisture content of bed media	Mar/Sept
Weekly - condition and depth of biofilter	
Daily-odour assessment of bed media	
Dust & Bioaerosol Monitoring	Mar/Sept
Bi-annually - Dust	
Bi-annually - PM10, Bacteria, Aspergillus fumigatus	
Bi-annually - Odour	
Noise Monitoring	Mar or Sept
Annually - L(A)EQ, L(A)10, L(A)90, Frequency Analysis	
Nuisance Inspections	
Weekly - litter, vermin, birds, flies, mud, dust, odour	
General Inspections	
Weekly - washdowns, drainage system, bunding	
Compost Quality	
Quarterly	

Environmental Management System Manual

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Introduction

O'Toole Composting Ltd is a family run organisation. Our facility at Ballinrane, Fenagh, County Carlow includes an in-vessel tunnel composting system and a skip-hire business.

A hold a current Waste Facility Permit (ref 01/07) which was issued by Carlow County Council on 3rd August 2007.

We also hold Waste Collection Permits that allow us to collect waste in the following regions:

Dublin, South East, Cork, Kildare, Midlands, Wicklow and Limerick/Clare/Kerry.

Condition 3.10.1 of our current Waste Facility Permit (ref 01/07) requires that we implement an Environmental Management System. The EMS must include the following as a minimum. This document describes how we meet these requirements.

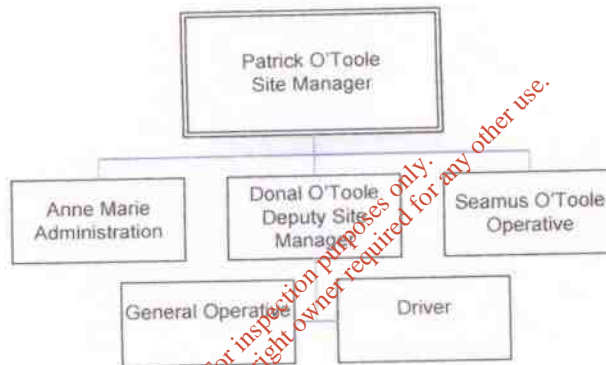
- Schedule of Environmental Objectives and Targets – The objectives should be specific and the targets measurable. The Schedule shall address a five-year period as a minimum. The Schedule shall include a time-scale for achieving the objectives and targets and shall comply with any other written guidance issued by the Council.
- Environmental Management Programme (EMP) shall include as a minimum (i) methods by which the objectives and targets will be achieved and the identification of those responsible for achieving those objectives and targets; (ii) any other items required by written guidance issued by the Council. A report on the programme, including the success in meeting agreed targets, shall be prepared and submitted to the Council as part of the AER.
- Corrective Action Procedures – The permit holder shall establish procedures to ensure that corrective action is taken should be specified requirements of this permit not be fulfilled. The responsibility and authority for initiating further investigation and correction action in the event of a reported non-conformity with this permit shall be defined.
- Awareness and Training Programme – The Awareness and Training Programme shall identify training needs, for personnel whose work can have a significant effect upon the environment. Appropriate records of training shall be maintained.
- Communications Programme – Within three months of the date of grant of this permit, the permit holder shall establish and maintain a Communications Programme to inform and involve the local community and ensure that members of the public can obtain information at the facility, at all reasonable times, concerning performance of the facility.

- Maintenance Programme – The permit holder shall establish and maintain a programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment. Appropriate record keeping and diagnostic testing shall support this maintenance programme.

To introduce a more complete EMS we have also included the following:

- Organisation structure
- Environmental Policy
- Environmental Aspects and Impacts
- Environmental Legislation
- Environmental Procedures and Forms

Organisation Structure



Environmental Policy

Our first environmental policy was issued in March 2009. This is reviewed and updated on an annual basis. The policy is included in our Register of Public Information.

Environmental Policy

O'Toole Composting operates a waste facility in Carlow which includes an in-vessel composting operation and a facility for the recycling of skip waste.

We operate under the Conditions of a Waste Facility Permit issued to us by Carlow County Council and we also have Waste Collection Permits that permit us to collect waste in a number of regions across Ireland.

We are committed to:

- Prevention of pollution and continual improvement in our environmental performance, by setting annual objectives and targets.
- Complying with all environmental legislation that applies to us.
- Increasing recovery of waste and finding the best environmental option for recovered materials.
- Providing training and support to staff so that they can carry out their environmental responsibilities effectively.
- Maintaining an open dialogue with our neighbours and the general public.
- Making our environmental policy available to the public and interested parties.

Patrick O'Toole, Director
30th March 2008

Environmental Aspects and Impacts

Our environmental aspects and impacts have been identified as follows:

Activity	Aspect	Impact	Condition (Normal, Abnormal, Emergency)	Significance	Notes	Link to Objectives (ref)
Composting process	Odour from waste acceptance	Odour nuisance to neighbours	A	High	Complaints have been received in the past. No complaints since Jan 2008. Maintain existing controls and monitor situation.	-
Composting process	Dust from movement of materials	Dust nuisance to neighbours	N	Medium	No complaints received. Maintain existing controls and monitor situation.	-
Composting process	Noise from plant and vehicles	Noise nuisance to neighbours	N	Medium	No complaints received. Maintain existing controls and monitor situation.	-
Materials handling	Potential oil/chemical spillages	Pollution of water/groundwater/land	E	High	Storage of chemicals requires some improvement. Maintain existing controls and monitor situation.	13, 14, 15, 16
Skip Hire	Odour from offloading waste	Odour nuisance to neighbours	N	Low	No putrescible waste accepted. Low risk.	-
Skip Hire	Dust from offloading waste	Dust nuisance to neighbours	N	Low	All waste offloaded indoors. Low risk.	-

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Activity	Aspect	Impact	Condition (Normal, Abnormal, Emergency)	Significance	Notes	Link to Objectives (ref)
Skip Hire	Non conforming wastes found in skips	Potential non compliance with permit	A	High	No written policy in place for non conforming materials	9, 17
General site management	EMS not fully implemented	Non compliance with permit	N	High	Implementation of EMS required	1-12, 18-22

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Environmental Legislation

Environmental Legislation applicable to our operations includes the following:

Legislation	Requirement	Application/related procedures
Waste Management (Facility Permit) Regulations 2008, as amended	Waste facility permit required for our operations	Waste Facility Permit 01/07, issued by Carlow County Council
Waste Management (Collection Permit) Regulations 2008, as amended	Waste collection permit required for each waste management region we wish to collect waste in	Waste Collection permits: Cork - CKWMC326/05 Dublin - 762/5 Kildare - WCP/KE310C/07C South East - WCP/KK/283(A)/07 Wicklow - WCP/WW/306/05A Limerick, Clare, Kerry - WCP330 05b Midlands - WCP/KE310C/07C
Planning and Development Act 2000 and Planning & Development Regulations 2001	Planning permission required for any changes to the waste facility (which may include environmental conditions)	Planning permission obtained for all current activities.
Road Traffic (Car Testing) Regulations, 1998	Vehicles, plant, and equipment must be kept maintained to minimise air pollution	Maintenance Procedure and Programme in place EMP004 and EMF010
Local Government (Water Pollution) Acts, 1977 - 1990	Follow procedure for storage of fuels, oils, paints, and chemicals on site (WI - 001). Refer to WI - 005 for spillage response	Procedure in place for emergencies/spillages EMP006

Legislation	Requirement	Application/related procedures
Waste Management Acts 1996 - 2005	The Company has a duty of care to ensure that waste is appropriately managed to avoid damage to the environment. We must prevent the escape of waste, only transfer waste to an authorised person, describe the waste, and keep records.	Waste Permit Record Forms EMF002 and EMF003 record permit details of all contractors
Waste Management (Facility Permit) Regulations; Waste Management (Licensing) Regulations; Waste Management (Waste Electrical and Electronic Equipment) Regulations 2005	Ensure that all waste produced is disposed of or sent for recovery/recycling at an appropriately authorised facility.	As above.
Waste Management (Movement of Hazardous Waste) Regulations 1998	A C1 form must be completed for all hazardous wastes removed from or by the company. The C1 form is obtained from the local authority where the hazardous waste originated. Hazardous waste must be removed by a company licensed to do so. Do not mix hazardous wastes.	Requirement included in Waste Acceptance, Handling and Rejection procedure EMP005.

Environmental Objectives, Targets and Environmental Management Programme

Environmental Objectives and Targets are set at the beginning of each year and are included in our Annual Environmental Report which is required to be submitted to Carlow County Council by 28th February every year.

An environmental management programme is the means for achieving our objectives and targets. This is included in the list of objectives and targets described above.

The objectives, targets and environmental management programme (EMP) for 2009 is as follows.

The EMP for 2009 was revised in May 2009 to demonstrate progress and to add two additional long term targets.

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Environmental Procedures

Procedures have been written to describe how we carry out key tasks in a manner that ensures environmental protection and meets the requirements of environmental legislation, including our waste permit:

Ref	Title
EMP001	Corrective Action Procedure
EMP002	Training Procedure
EMP003	Communications Procedure
EMP004	Maintenance and Inspections Procedure
EMP005	Waste acceptance, handling and rejection Procedure
EMP006	Emergency Response and Incidents Procedure
EMP007	Complaints Procedure
EMP008	Weekly Inspection Procedure

The procedures and forms include Corrective Action Procedures, Awareness and Training and Communications programmes, which are the minimum elements of the EMS required by Carlow County Council.

Environmental Management Forms

The following forms are also part of our environmental management system:

Ref	Title
EMF001	Bund Inspection sheet
EMF002	Waste Permit Record Form – Waste In
EMF003	Waste Permit Record Form – Waste Out
EMF004	Waste Permit Record Form – OTC permits
EMF005	Corrective Action Form
EMF006	Environmental Training Record Form
EMF007	Environmental Complaint Form
EMF008	Environmental Incident Reporting Form
EMF009	Waste Acceptance Form (Compost batches)
EMF010	Maintenance and Calibration Record
EMF011	Vermin Bating Record Form
EMF012	Scrubber Filter Maintenance Form
EMF013	Nuisance Inspections

EMF014	General Cleaning Form
EMF015	Drainage System Inspection form
EMF016	Bund inspection form
EMF017	Rejected Waste Form
EMF018	Waste Acceptance & CCP1 form

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Monitoring Schedule

A monitoring Schedule is compiled on an annual basis to schedule the monitoring required by the facility's waste permit. The schedule for 2009 is as follows:

O'Toole Composting Ltd : 2009 Environmental Monitoring Schedule

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Biofilter Monitoring
Bi-annually – Ammonia, Mercaptans, Hydrogen Sulphide & Armines in inlet and outlet gas
Annually – pH, Ammonia, Total viable counts and Moisture content of bed media
Weekly – condition and depth of biofilter
Daily – odour assessment of bed media
Dust & Bioaerosol Monitoring
Annually – Dust
Annually – PM10, Bacteria, Aspergillus fumigatus
Three times annually – Odour
Noise Monitoring
Annually – L(A)eq, L(A)10, L(A)90, Frequency Analysis
Nuisance Inspections
Weekly – litter, vermin, birds, flies, mud, dust, odour
General Inspections
Weekly – washdowns, drainage system, bunding

Maintenance Schedule

A Maintenance Schedule is compiled on an annual basis to schedule the monitoring required by the facility's waste permit. The programme is compiled at the beginning of each year and recorded on the Maintenance and Calibration Programme/Record form EMF010.

Odour Management Programme

The waste permit requires us to "submit an odour management programme for agreement by the Council outlining current odour reduction measures and their effectiveness and further odour reduction measures appropriate for the site. The permit holder shall implement this odour management programme with the agreement of the Council, within a specified timeframe. The odour management programme shall be reviewed annually and amendments thereto notified to the Council for agreement as part of the Annual Environmental Report (AER). A report on the programme shall be prepared and submitted to the Council as part of the AER".

Since the site began operation there have been periodic odour complaints from neighbours.

During 2007 considerable progress was made in reducing odours from the facility. This included the following measures:

- Doors are closed as much as possible during operations.
- Misting equipment has been installed on the biofilter stack. This mixes an odour neutralising agent with the air being emitted from the stack.
- An aeration floor for the compost building was installed, this forces air through the maturing compost which helps it to stabilise and reduces odours.

There was only one odour complaint in early 2008, which was in relation to a problem with the biofilter media. The corrective actions implemented were effective and the site has had no subsequent odour complaints.

Odour management at the facility is now effective but current controls will be maintained and this situation will be monitored to ensure that we continue to not cause a nuisance to any of our neighbours.

Communications Programme

In correspondence from Carlow County Council dated 7th March 2006 it was recommended that "a public folder is prepared with general information on the facility, a copy of the complaints and incidents register and Carlow County Council Audit/site inspection reports. This folder should be held on site and made available to members of the public on request".

Since this time the information available to the public has been expanded to include the following information. The following information is freely available to any member of the public during opening hours:

- Environmental Policy
- Environmental Management System Manual
- Annual Environmental Report for the previous year
- Monitoring results for the current year
- Carlow County Council Audits / site inspection reports
- Complaints and incidents forms

Any queries regarding the environmental management system should be addressed to the Facility Manager, Patrick O'Toole.

O'Toole Composting
Ballintrane
Fenagh
Co.Carlow

Email: info@otoolecomposting.ie
Tel: 059- 9148984

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WASTES NOT ACCEPTED IN SKIPS

- ★ PAINT
- ★ LIQUIDS
- ★ FLOURESCENT LIGHTS/BULBS
- ★ MEDICAL WASTES/SYRINGES
- ★ OIL
- ★ WEEE (WASTE ELECTRICAL & ELECTRONIC EQUIPMENT)
- ★ TYRES
- ★ GAS CYLINDERS
- ★ AEROSOLS

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Attachment C.3: Hours of Operation

Due to the nature of the on-site activities the composting process must operate on a continual basis. For this reason it is proposed to operate the facility 24 hours a day, seven days a week.

Proposed waste acceptance hours are as follows:

- ✦ 07:00 -19:00 Monday to Friday
- ✦ 08:00 - 16:00 Saturdays

It is not proposed to accept waste on Sundays or Bank Holidays. In exceptional circumstances, should waste acceptance be required on a particular Sunday or Bank Holiday prior approval will be sought from the Agency.

Any construction works carried out at the facility will be in accordance with operating hours as set out in the relevant planning permission conditions and will be submitted to the Agency as construction works are proposed.

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