PADRAIG THORNTON WASTE DISPOSAL LTD

DUNBOYNE CIVIC AMENITY AND MATERIALS RECYCLING FACILITY

Waste License Wo206-01





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ANNUAL ENVIRONMENTAL REPORT 2012

Submitted February 2013
Prepared by Mercedes Kavanagh-Environmental Manager

Table of Contents

1.	Introduction	. 3
2.	Description of the Site and Licensed Waste Activities	3
3.	Waste Management Record	4
3.1	Waste Acceptance	5
3.2	Waste Received 2012	6
3.3	Waste Consigned 2012	6
4.	Dust and Particulate Matter Monitoring	7
4.1	Dust Monitoring	7
4.2	Particulate Matter Monitoring	8
5	Noise Monitoring	8
6.	Emissions to Surface Water and Foul Water	9
6.1	Surface Water monitoring	9
6.2	Foul Water Monitoring	1
7.	Resource Consumption Summary	13
	Water	
7.2	Diesel	13
7.3	ESB	
8	Complaints Summary	4
9	Schedule of Environmental Objectives and Targets and Environmental	
Mar	nagement Programme	
10	Tank and Pipeline Inspection Report	5
	Tank Bunding	
10.2	Pipeline Testing	5
11	Reported Incidents Summary	5
12	Odour Management Programme	6
13	Energy Efficiency Audit Report Summary	6
14	Pest Control Programme Report	6
15	Report on Progress made and Proposals being developed to Minimise Water Deman	d
	the Volume of Trade Effluent Discharge	
	Water Requirements	
	Water supply and Storage	
15.3	Foul water discharge	7
15.4	Progress on Minimisation of Water Usage	7
16	Reports on Financial Provision made under this License, Site Management structure	
of th	e facility and a Programme for Public Information	8
	Financial Provision	
	Site Management Structure 2012	
	Program of Public Information	
17	Environmental Liabilities	9

List of Appendices 2012

- Appendix 1 Waste Acceptance Procedure Dunboyne EP 13
- Appendix 2 Weighbridge Certificate
- Appendix 3 Dust Deposition and PM10 monitoring locations
- Appendix 4 Noise monitoring locations
- **Appendix 5-** Surface and Foul water monitoring location and weekly SW3 results for 2012
- **Appendix 6** Summary of Insurance Details 2012-2013

1. Introduction

Padraig Thornton Waste Disposal Limited (PTWDL) operates waste license (W0206-01) which was issued by the Environmental Protection Agency (EPA) on the 25th July 2005 to operate a Civic Amenity and Materials Recycling Facility. In accordance with the requirements of Condition 11.9 and Schedule D of the waste License, an Annual Environmental Report (AER) for the facility must be submitted to the EPA not later than March 31th of each year for the preceding calendar year. This AER is for the period from the 1st January 2012 to 31st December 2012.

The facility is located at:-

Dunboyne Industrial Estate, Dunboyne, Co. Meath.

The contact details for the facility are as follows:

Telephone: 01 6235133/0868241034

Fax: 01 8013896

EPA Site Contact: Mercedes Kavanagh

The national grid reference for the facility is 3011E, 2428N.

The address and contact details for the facility operator's headquarters are:

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

Telephone: 01-6235133

Fax: 01-6235131

2. Description of the Site and Licensed Waste Activities

The facility is located in the Dunboyne Industrial Estate, which is 600m north of Dunboyne village on the R157 road. The site occupies an area of approximately 1.6 hectares. Access to the facility is via the Dunboyne Business Park.

The surrounding land is predominately agricultural pastureland, with the remaining land consisting of light industrial processes within the Dunboyne Industrial Estate. The nearest residential area is Lutterell Hall, which is located approximately 200m southwest of the facility. In 2009 the new R157 was constructed north of the facility. This is known locally as the "Dunboyne By-Pass".

The licensed waste handling activities, permitted under the Third Schedule¹ and Fourth Schedule² of the waste Management Act 1996 to 2003 for the facility are detailed below:

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 is produced.

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 metal and metal compounds. Fourth Schedule, Class 4: Recycling or reclamation of other inorganic materials. Fourth Schedule, Class 12: Exchange of waste for submission to any activity referred to in a preceding paragraph of this 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.

3. Waste Management Record

During 2012 all skip waste was diverted from the facility to our Killeen Road facility and the MRF was used for temporary storage of SRF on a number of occasions during the year. The civic amenity site remained open to the public. All waste which entered the facility was checked and documented at the weighbridge in accordance with our waste license W0206-01 and waste acceptance procedure EP13 (Appendix 1).

The weighbridges were checked and re-certified by Precia Molen on the 5th July 2012. A copy of the service report is contained within Appendix 2 of this report.

PTWDL extended the range of materials it accepted at the civic amenity site in 2012. Weights of the material accepted are calculated from the weights of the bulked loads before they are consigned from the facility and not as they are delivered to the facility.

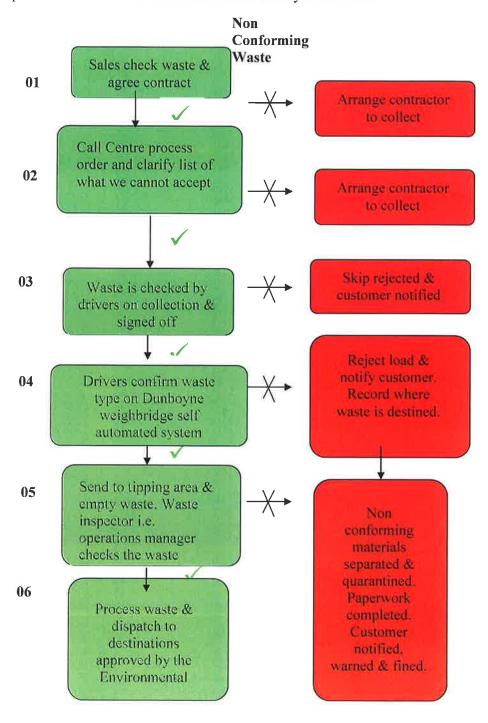
Thorntons Recycling maintained ISO certification for ISO 14001 Environmental, ISO 9001 Quality and OHSAS 18001 Health and Safety at the Dunboyne facility. Integrated management procedures are available for inspection at any of the company offices on a designated drive called the X Drive IMS drive.

¹ Third Schedule- Waste Disposal Activities

² Fourth Schedule- Waste Recovery Activities

3.1 Waste Acceptance

Figure 1 below is a simplified diagram explaining the normal waste acceptance procedures at Thorntons Recycling Dunboyne but as discussed previously in 2012 all skip waste was diverted to our Killeen Road facility W0044-02.



3.2 Waste Received 2012

A total of 4,718.81 tonnes of material was received at the Materials Recovery Facility (MRF) between 1st January 2012 and 31st December 2012. Of this 4715.55 tonnes was SRF (Solid Recovered Fuel) material for short term storage before being dispatched to an approved Cement Kiln in Ireland. A total of 336.87 tonnes of recyclable material was accepted at the civic amenity (CA) site during this year giving a total of 5055.68 tonnes for the MRF and the CA site. A summary of the waste that was accepted during the year is detailed in Table 1 below

Table 1: Summary of Waste accepted at the MRF during 2012

EWC	Material Received	Tonnes
20 03 07	Bulky MMW/ Skip Waste	3
19 12 10	Combustible Waste/SRF	4,716
	Total Into MRF Site	4,719.

3.3 Waste Consigned 2012

A total of 5,332.33 tonnes of waste material was consigned from the facility during the reporting period of 2011. This tonnage includes tonnage which came in through the civic amenity site.

Table 2: Summary of Waste consigned from the site during 2012

EWC	Materials Consigned	Tonnes
19 12 02	Mixed Metals	25.39
17 01 07	Clean Construction Rubble	81.32
17 05 04	Soil and Stones	32.88
19 12 07	Wood Processed or Chipped	67.54
15 01 03	Wood Packaging	45.04
20 02 01	Green Waste	21.14
15 01 07	Glass Packaging	26.00
19 12 09	Trommel Fines	106.16
20 03 01	Mixed Dry Recyclables	58.82
15 01 02	Plastic Bottles	4.68
15 01 04	Metallic Packaging Aluminum	0.74
20 01 39	Plastic Film	9.48
15 01 05	Tetrapak	1.98
20 03 07	Mixed Municipal Waste	72.16
19 12 10	SRF / Combustible Waste	4,374.00
20 01 01	Cardboard	32.90
20 01 01	Paper Mixed	25.52
17 09 04	Mixed Construction and Demolition Waste	282.52
17 03 03	Mixed Hard Plastics	8.42
20 01 10	Textiles/Clothes Banks	4.13
20 01 35/36	Total WEEE – Mixed/Fridges and Freezers etc	46.73
MANAGE AND	Total Consigned from MRF and CA Site	5,332.39

Due to the downturn in the Construction trade and commercial/industrial and household skip waste the facility experienced a decrease in the amount of C & D and Bulky MMW for processing in 2011. This trend continued in 2012 and for this reason it was decided to divert all skip waste to the Killeen Road facility W0044-02 during 2012. The civic amenity site was left open for the public in Dunboyne and the MRF was used for temporary storage of SRF awaiting consignment to two approved cement kilns in Ireland.

4. Dust and Particulate Matter Monitoring

Quarterly reports for dust and particulate matter PM10 were submitted to the Agency for 2012 in April (206-01/12/MA/01), July (206-01/12/MA/03), Oct (206 01/12/MA/08) and quarter 4 is contained within this report.

4.1 Dust Monitoring

In compliance with Condition C.6 of waste license W0206-01 dust deposition and particulate matter (PM10) monitoring was carried out quarterly at the facility. The monitoring locations are shown in Appendix 3.

Dust deposition monitoring was carried out by an independent consultant, Fehily Timoney and Company during 2012

Dust deposition monitoring was carried out at four locations (D1-D4) using Bergerhoff type gauges placed at a height of at least 1.5 metres above the ground for a continuous period of 30 days. The results of the dust deposition are shown in Table 4 below.

Table 4: Dust deposition results for each dust monitoring location per quarter during the year 2012

Dust Monitoring Dunboyne								
Monitoring Locations	Quarter 1	Quarter 2	Quarter 3	Quarter 4	ELV mg/m2/day			
D1	153	224	48	89	350			
D2	127	180	29	225	350			
D3	148	212	140	44	350			
D4	113	199	15	101	350			

The dust deposition results above show that there was no exceedance in the emission limit values for dust deposition in 2012 at the facility.

4.2 Particulate Matter Monitoring

Particulate matter monitoring was carried out by an independent consultant, Fehily Timoney & Co., at four locations (D1-D4) using PM10 filters for a period of 24 hours at each location. The results of the PM10 monitoring are shown in Table 5. All results were below the level of $50 \text{ug/m}^2/\text{day}$ as set down in Schedule B.5. of the waste license W9206-01. The appointed consultants failed to carry out particulate matter monitoring in Quarter 4 at the facility as explained to the EPA in correspondence dated the 8th January 2013, reference 206-01/13/MK/02.

Table 5: Particulate Matter monitoring results for each quarter during 2012 at four locations on the site boundary

		ng Dunboy	110						
Monitoring 1 2 3 4 ELV Locations mg/m3/day									
7.9	5.4	33.9	*	50					
26.3	14.9	42.6	*	50					
8.9	24.2	13.3	*	50					
<1.3	22.4	19.6	*	50					
	7.9 26.3 8.9	7.9 5.4 26.3 14.9 8.9 24.2	7.9 5.4 33.9 26.3 14.9 42.6 8.9 24.2 13.3	1 2 3 4 7.9 5.4 33.9 * 26.3 14.9 42.6 * 8.9 24.2 13.3 *					

5 Noise Monitoring

In compliance with Schedule B.4 and C.5 of waste license W0206-01 noise monitoring was carried out bi-annually at the facility. Noise monitoring was carried out by trained staff of Thorntons' Environmental Department. As the facility only operates during the day, only daytime monitoring was carried out. The monitoring locations are contained within Appendix 4 of this report.

Daytime monitoring was carried out in:

- June 2012 (Reference report 9th July 2012, 206-01/12/MA/04)
- August 2012(Reference report 22nd August 2012, 206-01/12/DD/02)

Monitoring was carried out at six sampling locations; four locations (NP1-NP4) are to determine the noise levels at the boundary during daytime operations and two locations (NP5 & NP6) are to determine the noise levels at the nearest noise sensitive receptors. The results are tabulated in Table 6 for 2012 and show the recorded noise levels during the respective noise monitoring periods.

The analysis of the results from the noise monitoring shows that the noise levels at the noise sensitive locations are not adversely impacted upon by the site activities in the reports submitted to the EPA in 2012. The site remained largely inactive during 2012 with all skip waste being diverted to our Killeen Road facility W0044-02.

Table 6: Bi-annual noise monitoring results for the period of 2012 at 6 locations

	-		2				
Monitoring	Half 1 (20th Jun	e 2012 }	Half 2 (16th August 2012)			ELV
Locations	LA, eq (dB)	LA 10 (dB)	LA90(dB)	LA, eq (dB)	LA 10 (dB)	LA90(dB)	(dB)
NP1	57	62	36	56	59	49	n/a
NP2	56	60	41	61	64	49	n/a
NP3	54	57	43	56	58.0	49	n/a
NP4	56	60	46	55	58	47	n/a
NP5	55	60	45	50	50	41	55
NP6	64	64	41	64	62	45	55

6. Emissions to Surface Water and Foul Water

In compliance with schedule B.3, C.2.3, C.3.1 and C.3.2 monitoring is carried out on the foul and surface water. The monitoring locations for the foul (FW1) and surface water (SW1, SW2, and SW3) are shown in Appendix 5.

6.1 Surface Water monitoring

The waste license W0206-01 requires that weekly monitoring be carried out at SW3 where the yard runoff is discharged to the local surface water drain after it passes through a silt trap and oil interceptor on site. As there are no emission limit levels contained within the license for surface water monitoring at SW3 additional monitoring points have historically been sampled upstream and downstream of the discharge point to identify any impact the site is having on the local surface water network. Quarterly monitoring reports have been forwarded to the EPA in Quarter 1, 2, 3 and detailed explanations of results, quarter 4 has been submitted as part of this AER (Reference 10th April 2012 206-01/12/MA/01, 12th July 2012 206-01/12/MA/03, 10th October 2012 206-01/11/MA/08). Monitoring point SW1 is located upstream, to the west of the site, at the point where the local drain enters the site boundary. Monitoring point SW2 is located downstream to the north of the site where the drain leaves the site boundary. A bypass road for Dunboyne village runs adjacent to the site and the surface water drain

Table 7: Surface water monitoring results per quarter of 2012 at monitoring location SW1

Surface Water 1 - Upstream Local Drain enters the Site									
Monitoring Parameters	Quarter 1 13.03.12	Quarter 2 24.05.12	Quarter 3 30.08.12	Quarter 4 05.12.12	Units				
BOD	4.49	10.3	<2	2.01	mg/l				
COD	18.8	31.3	13.2	9.01	mg/l				
Suspended Solids	11	38.9	2.5	2.5	mg/l				
					рН				
pН	7.74	7.6	7.92	8.07	Unit				
Orthophosphate (as P)	<0.03	<0.05	0.0274	<0.02	mg/l				
Ammoniacal Nitrogen (as N)	0.206	<0.2	0.205	0.202	mg/l				

Table 8: Surface water monitoring results per quarter of 2012 at monitoring location SW2

Surface Water 2 - Downstream Drain leaves the site									
Monitoring	Quarter 1	Quarter 2	Quarter 3	Quarter 4					
Parameters	13.03.12	24.05.12	30.08.12	05.12.12	Units				
BOD	3.27	4.54	6.75	<2	mg/l				
COD	8.23	17.1	42.3	<7	mg/l				
Suspended Solids	11	13.6	12.5	<2	mg/l				
рН	7.93	7.52	7.73	8.05	pH Unit				
Orthophosphate (as P)	0.165	<0.5	0.0343	<0.02	mg/l				
Ammoniacal Nitrogen (as N)	0.747	<0.2	0.252	0.02	mg/l				

Monitoring point SW3 is the discharge point from the facility to the local drain. Due to SW3 being the discharge point a more detailed analysis of the water is carried out. The results for these are tabulated in Table 9.

Table 9: Surface water monitoring results per quarter of 2012 at monitoring location SW3

		r 3 - Discha	3		
Monitoring	Quarter 1	Quarter 2	Quarter 3	Quarter 4	EPA Trigger
Parameters	13.03.12	24.05.12	30.08.12	05.12.12	mg/l
BOD	<2	<2	<2	<2	41112
COD	14.3	<7	15.4	11.8	30
Suspended Solids	<2	<6	3	3	25
рН	7.98	7.99	8.11	8	6 - 9
Orthophosphate (as P)	<0.03	0.065	0.0333	<0.02	
Nitrates (as NO3)	2.14	1.8	2.34	1.9	
Ammoniacal Nitrogen (as N)	0.223	<0.2	0.28	<0.2	
Copper	0.0038	0.00212	0.00204	0.00245	
Zinc	0.0024	0.00287	0.00361	0.00727	
Sulphates (as SO4)	97.7	127	52.9	60.8	
Detergents MBAS	<0.05	<0.05	<0.05	0.0876	
Phenols	<0.025	<0.025	<0.016	<0.016	
Mineral Oils	0.421	<0.01	0.301	0.0407	
Chloride	18.2	15.3	3.3	21.3	
Colour	3.21	1.8	<1	7.12	
Visual inspection		Log	maintained		

The surface water is sampled weekly at S3 by an independent consultant. S3 is the point at which surface water discharges from the site to the drainage ditch. All results have been forwarded to the EPA in quarterly reports in 2012 and a full detailed weekly set of results for 2012 is contained within Appendix 5 of this report.

The EPA set trigger levels for this weekly sample in correspondence dated the 24th January 2011 (reference W0206-01/NC06NH). Samples taken on the 16th February, the 13th and 27th April, 20th July and the 12th October 2012 exceeded trigger levels as set down by the EPA in 2011 and were therefore all reported as incidents to the EPA during 2012.

Historically samples have been carried out quarterly at three locations even though the license only specifies one. These are carried out to ascertain if indeed the site is having any impact on the surface water drainage network. S1 sample was taken from the stream at the point of entry into the site (upstream). S2 sample was taken from the stream at the point of exit from the site (downstream) and S3 sample was taken from the stream at the emission point from the site i.e. the outlet drainage pipe.

As may be noted the pH, COD and suspended solids are below trigger levels of pH 6-9, COD 30mg/l and Suspended Solids 25mg/l as set down by the EPA in correspondence dated the 24th January 2011 for the quarterly sample on S3. In fact during the second quarter of 2012 a sample taken from S1 i.e. where drain enters the site/upstream had elevated COD and suspended solids however on leaving the site at S2 COD and suspended solids levels are below trigger levels hence the entrance of S3 the surface water outlet having a positive effect on the local drain.

In conclusion based on weekly and quarterly results for 2012 the site was not having an adverse effect on the water quality of the drainage surface water network, in some cases the site actually positively influenced the outlet.

6.2 Foul Water Monitoring

In accordance with the waste license (W0206-01) under schedule B and C all emissions to sewer must be monitored. Emissions to sewer must be monitored on a quarterly basis. Table 10 and Table 11 details foul water monitoring results for 2012

Table 10: Foul water monitoring results per quarter of 2012

Foul Water Results 2012								
Monitoring	Quarter 1	Quarter 2	Quarter 3	Quarter 4	ELV			
Parameters	13.03.12	24.05.12	30.08.12	24.10.12	mg/l			
BOD	6.71	6.04	<2	144	1000			
COD	17.6	15.2	8.44	136	3000			
Suspended Solids	6.5	<6	<2	52.2	1000			
рН	7.74	7.72	7.96	7.59	6 - 10			
Phosphorus (as P)	0.387	0.133	0.068	0.0348	20			
Nitrates (as NO ₃)	7.74	4.82	4.79	4.67	100			
Ammoniacal Nitrogen (as N)	7.79	0.539	0.363	1.64	10			
Colour True	3.5	<1	3.1	<5	-			
Mineral Oils	0.278	<10	<10	0.437	20			
Sulphates (as SO ₄)	194	253	244	259	1000			
Detergents MBAS	0.0542	<0.05	0.103	0.0972	20			
Phenois	0.05	<0.025	<0.016	0.03	0.1			
Chloride	25.3	19.6	11.4	17.9	250			
Organic Solvents	None	None	None	None	no visible film			

Table 11: Heavy Metal Results for Foul Water 2012

Foul Water Heavy Metal Results 2012							
Monitoring	Quarter 1	Quarter 2	Quarter 3				
Parameters μg/l	13.03.12	24.05.12	30.08.12				
Dissolved Zinc Low Level	4.51	9.89	16.3				
Dissolved Mercury Low Level	<0.01	<0.01	<0.01				
Dissolved Arsenic Low Level	1.3	1.26	1.6				
Dissolved Cadmium Low Level	<0.1	<0.1	<0.1				
Dissolved Chromium Low Level	<0.22	12.1	4.73				
Dissolved Copper Low Level	12.7	9.88	7.86				
Dissolved Lead Low Level	0.139	0.227	<0.02				
Dissolved Nickel Low Level	4.51	3.65	3.4				
Dissolved Selenium Low Level	14.6	13.9	10.8				
Units measured in ug/l	- Only requir	ed Bi annua	ally				

The discharge to the foul water for each quarter of 2012 was below the emission limit values set down by the waste license. The heavy metals in the foul water were also measured three times during the reporting period, which is in compliance with the biannual monitoring requirements as per condition C.3.2 of the waste license (Table 11).

7. Resource Consumption Summary

This section details the resources used by the facility during the period of 1st January 2011 to the 31st December 2012. Resources that were monitored include fuels, water and ESB.

7.1 Water

In 2012 5,632m³ of foul water was discharged from the site at FW1, as measured from the continuous recording meter located at the discharge point. 3,908m³ was discharged to the surface water at SW3 as measured from the continuous recording meter located at the discharge point.

Water that is discharged via the foul water consists of water used in the toilets, showers, offices, truck wash, wheel wash, bin wash and washing down the MRF floors.

Water that is discharged into the surface water consists of water from the runoff from the roofs of the buildings and from the hard standing in the yard. Surface water runoff is not linked with the site activities and is linked with the quantity of rainfall and snow throughout the year, only rainwater that falls onto the hard standing and the roofs of the buildings is discharged at this point.

Table 12: Foul and Surface Water discharges from 2005-2012 (m3)

	2005	2006	2007	2008	2009	2010	2011	2012
Foul	3461	3080	3144	4691	4528	4622	3926	5632
Surface	5665	6459	6636	8479	8728	7003	5505	3918

7.2 Diesel

The main types of fuel used at the facility in the past included road diesel, plant diesel (Gas Oil) for the machinery working on site and heating oil (Kerosene) for the offices. However during 2012 all skip waste was diverted to our Dublin facility and only one staff member remained on site to man the civic amenity site. Plant machinery was not operated as the MRF was largely used for the storage of SRF. Therefore there were no deliveries of road diesel, plant diesel or heating oil to the facility after January 2012

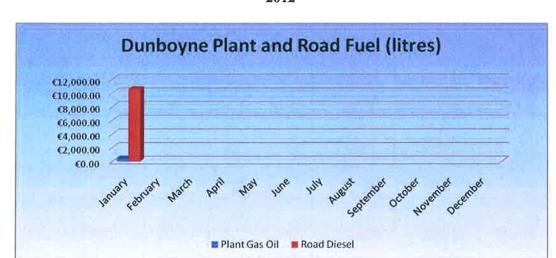


Figure 2 Monthly consumption of road diesel and plant gas oil at Dunboyne during 2012

7.3 ESB

Thorntons Recycling has implemented an energy management programme on all its licensed sites, which will aim to reduce energy consumption.

As can be seen from Table 13 there was a reduction in electricity consumption from 2010 to 2011 and 2012. In 2011 the annual consumption of daytime kWh was 64,054 kWh and the nighttime usage was 17,320 kWh. This decreased further to 20,100 Daytime kWh and 9540 Night kWh, This may be attributed to a reduction in activity at the facility but also specific actions carried out as per the facilities energy management programme. It is hoped that electricity consumption at the site can be further reduced in 2013. Table 13 displays the annual usage of electricity in 2012.

Table 13: Comparison of ESB energy usage between 2010, 2011 and 2012

Year	Day k/Wh	Night k/Wh
2010	94559	23880
2011	64054	17320
2012	20100	9540

8 Complaints Summary

There was one environmental complaint received at the facility during 2012. This compliant was made in relation to burning in the Dunboyne area it was investigated and found not to be linked to any of Thorntons Recycling's operations.

Thorntons Recycling takes all complaints seriously and is committed to resolving any complaints if made in relation to the facility. If we receive a complaint we adhere to the company complaints procedure as per our ISO certified integrated management system.

9 Schedule of Environmental Objectives and Targets and Environmental Management Programme

Thorntons Recycling operates an Integrated Management System (IMS) which has been certified to ISO 14001 Environmental, OHSAS 18001 Health and Safety, ISO 9001 Quality. The complete content of the IMS is too large to contain within the body of this report, however the EPA can access this for inspection on a specially designated drive (X Drive) at any of the company's site offices.

The schedule of Environmental Objectives and Targets and the Environmental Management Programme for 2013 will be maintained on the IMS/X Drive once a management review of the IMS is completed in March 2013.

10 Tank and Pipeline Inspection Report

10.1 Tank Bunding

Thorntons Recycling commissioned Fehily, Timoney and Company in 2011 to carry out testing on the bunds at the Dunboyne facility as per condition 6.7 of the waste license. All three bunds were tested on the 17th and 18th of November 2011. The Main Diesel Bund passed and a copy of the bund certificate was enclosed in last year's AER.

The other two bunds on site include the heating oil tank (which is double skinned) and the generator bund, both of which were not in use in 2012. They will be scheduled for works and will be retested if they are going to be in used in 2013.

10.2 Pipeline Testing

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 6.7 of the waste license. Thorntons Tankering Service (TTS) completed a survey on all drains at the Dunboyne facility in June 2011. A full detailed copy of this report was forwarded to the EPA on the 24th August 2011 (Reference W0206-01/11/MK/07). In conclusion the report showed there were no structural defects detected in the foul or surface water drainage systems on site and that no works were required.

11 Reported Incidents Summary

Table 14 summarizes the incidents, which occurred in 2011. There were four incidents reported to the EPA and followed up with a written report as per the EPA guidelines

Table 14: Incidents 2012

Date sent	Comments on Incident
	Incident in SW weekly sample, exceedance
22.02.12	in SS reported to the EPA on the 22.02.12 for results on the 16.02.12
	Incident in SW weekly sample, exceedance in SS and COD reported to the
01.05.12	EPA on the 01.05.12 for results on the 13.04.12 and 27.04.12
	Incident in SW weekly sample, exceedance in PH reported to the EPA on the
31.07.12	31.07.12 for results on the 20.07.12
	Incident in SW weekly sample, exceedance in SS and COD reported to the
31.10.12	EPA on the 31.10.12 for results on the 12.10.12

12 Odour Management Programme

In 2012 all skip waste was diverted from the facility to be processed at Thorntons Recycling, Killeen Road W0044-02. The facility was only used for some months of the year for temporary storage of SRF awaiting dispatch to two approved cement kilns in Ireland. This material has been mechanically treated off site and would have a very low risk of potential odour emissions.

13 Energy Efficiency Audit Report Summary

Thorntons Recycling has an energy management system for all its licensed sites. Energy and resource usage are monitored such as electricity, Kerosene, road diesel etc. The system is available for viewing at any of the licensed facilities at Thorntons Recycling. It is hoped that with successful management that we will continue to make further reduction in energy resources.

14 Pest Control Programme Report

Pest control is carried out at 8 scheduled visits per year. Complete Pest Control are contracted to carry out pest control at the facility. Overall pest activity in 2012 was very low due. A copy of the Pest Control programme can be viewed on site.

15 Report on Progress made and Proposals being developed to Minimise Water Demand and the Volume of Trade Effluent Discharge

15.1 Water Requirements

Water requirements have decreased further in 2012 at the facility. If full operations were in place water would be required on the site for the following activities;

- Toilet and Canteen facilities
- Washing down the MRF
- Truck wash
- Fire Suppression

However in 2012 there was only one member of staff on site, based in the civic amenity site. Water was only used for sanitary facilities and bin washing. There was no fire at the site during 2012, thus no fire water was used.

With the exception of the fire suppression all of the above facilities discharge their effluents into the foul drainage system. In the event of a fire the water used to suppress it will be maintained on site for testing prior to discharge in the appropriate manner in consultation with the Agency and the appropriate local authorities. Thorntons Recycling has their own liquid waste/tankering division (TTS) who can be called upon in the event of an emergency.

15.2 Water supply and Storage

Water is supplied to the site via Meath County Council water mains network. A 80m³ water storage tank is located adjacent to the MRF. Water from this tank is used to wash down the MRF floor and for fire suppression if required. This tank is backed up with an auxiliary pump to increase the pressure in the event of requiring the stored water for fire suppression. Thorntons Recycling contracted Indepth, T/A McBreen Environmental, to carry out an investigation in 2010 on water usage and to ensure there was no water leaks on site, full detailed reports were forwarded to Meath County Council.

15.3 Foul water discharge

The license permits a maximum of 30m^3 /day to be discharge into the foul water. This equated to a total of 9360m^3 per year based on a six day working week. The meter reading on the foul water discharge shows that approximately $5,632\text{m}^3$ was discharged during 2012.

15.4 Progress on Minimisation of Water Usage

The water usage is now very low on the site due to all skip waste being diverted to our Dublin facility in 2012. There was only one full time member of staff on site working in the civic amenity site during the day time in 2012. The site was predominantly used for the storage of Solid Recovered Fuel (SRF) awaiting dispatch to approved cement kilns in Ireland. The main demand on water are related to washing of domestic trucks and bins Thorntons Recycling road sweeper cleans the yard and the hard standing when required avoiding the excessive use of water in the cleaning process on site.

16 Reports on Financial Provision made under this License, Site Management structure of the facility and a Programme for Public Information

16.1 Financial Provision

Padraig Thornton Waste Disposal Ltd, is insured by FBD Brokers (Appendix 6). PTWDL is insured for Employers Liability, Public/Products Liability and Motor Insurance.

Thorntons Recycling is insured under public liability for €12.5 million for sudden and accidental pollution incidents. Thorntons Recycling is a financially secure company, which is evident from the director's report and consolidated financial statements for the year ending 31st December 2011. The company has in place an integrated management system (IMS) which is certified to ISO14001 (Environmental), ISO9001 (Quality) and OHSAS18001 (Health and Safety) Management Standards. The Dunboyne facility was audited by Certification Europe in June 2011 and it received re certification in all three standards. Detailed risk assessments and environmental aspects are in place for the facility where appropriate levels of controls have been identified and assessed to ensure that standards are maintained and environmental risks are minimized at the facility.

A report in relation to the financial provision is required under condition 12.3 and was forwarded to the EPA previously. This report details the financial status of the company, financial commitments to cover environmental issues, decommissioning, aftercare management, environmental pollution and contingency arrangements in place at the facility. At this time detailed risk assessments were carried out and in conclusion the assessment states that no scenarios were identified which would exceed the insurance cover where the potential remediation costs would threaten the financial solvency of the company.

16.2 Site Management Structure 2012

Paul Thornton Gary Brady
Director Managing Director

Ciaran Dowling Tommy Rogers Maria Andrews 2012
Operations Facility Manager EHS Manager Environmental Manager

Mercedes Kavanagh will be the Environmental Manager for the site in 2013. She can be contacted regarding any queries that the Environmental Protection Agency may have. Mercedes' contact details are mobile 086-8241034 and e-mail mercedes@thorntons-recycling.ie.

16.3 Program of Public Information

Thorntons Recycling operates an open door policy. All information relating to activities carried out at Thorntons Recycling Civic Amenity and Materials Recovery Facility (MRF) is maintained on site. Public information is accessible at the site by appointment

with the Environmental Department, Thorntons Recycling Head Office or at the Office of Environmental Enforcement.

All new and existing clients are brought through our waste acceptance procedures and are supplied with information by sales representatives or customer service agents in relation to what waste types we can accept at the facility. During 2012 no new waste was accepted at the facility as all skip waste was diverted to our Killeen Road facility, W0044-02. It is the intention that this will continue in 2013 and that the Dunboyne MRF will be used for the storage of Solid Recovered Fuel (SRF) once agreed with the Agency. The civic amenity site will remain open to the public.

Thornton's Recycling website has a compliance section which customers can access, key environmental information such as waste collection permit numbers and waste licenses etc. are included on this website.

As discussed previously Thorntons Recycling Dunboyne has certification in ISO14001, ISO9001 and OHSAS18001 and has a detailed communication procedure which is available for the public on request.

17 Environmental Liabilities

Thorntons Recycling is committed to achieving the highest possible level of environmental performance and to the prevention of environmental damage. All facilities operated by the company are certified to international standards for Environmental, Health and Safety and Quality. All sites are subject to surveillance audits twice a year which are carried out by Certification Europe, Dunboyne was audited in June 2011.

Environmental liabilities and aspects are elements of our integrated management system (Procedure PM01 – Environmental Aspects Procedure and associated aspects register) which are regularly maintained and updated and are audited in detail during surveillance audits and internal audits carried out by trained auditors within the company. The Environmental Aspects Register (PM01-F02) for Thorntons Recycling Dunboyne facility is available for inspection on site. The company also has employed environmental management staff to ensure best practice guidelines and compliance with waste license W0206-01. A comprehensive emergency plan exists for all facilities operated by the company.

Title:

Waste Acceptance procedure Dunboyne



Reference Date issued Revision

EP13 30/10/2009 02

Relevant	Killeen Road	Kilmainham Wood	Shredding	Dunboyne	PDM	ELV	HQ	Tankering	MDR
to:-				V					

Purpose and Scope

The purpose of this procedure is to detail the waste acceptance procedure for Thorntons Recycling Dunboyne Civic Amenity and Materials Recycling Facility and also the procedure to be followed in the event of the discovery of unacceptable wastes at the facility.

Unacceptable Waste – a waste type that is not permitted to be handled at the facility and is listed in the "Materials we DON'T Accept"

Material We DO accept

(MRF only)

Construction waste Demolition waste

Timber

Topsoil

Brickwork Concrete

Mixed Metals

Clay and natural stone

Dry non-hazardous commercial

and industrial waste
Mixed Municipal Waste

(Civic amenity site ONLY)

Cardboard, Paper

Plastic Packaging Aluminium cans

Metal cans Tetra pak

Clothes Glass Bottles

Metal

Batteries

Electrical Goods Light bulbs Material we DON'T accept (MRF and Civic amenity site)

Animal remains or carcasses

Asbestos

Chemical Waste

Contaminated soil & Stone

End of Life Vehicles

Hazardous hospital waste

(Including sharps containers etc)

Liquid Waste

Materials contaminated with oil,

e.g oil filters or rags Oil/Water mixtures

Paints Tyres

Pharmaceutical waste Photographic waste

Pressurised vessels, e.g fire

extinguishers Road sweepings

Sludge Food Waste Saw Dust

Any hazardous material

Green waste

Title:

Waste Acceptance procedure Dunboyne



Reference Date issued Revision EP13 30/10/2009 02

Relevant	Killeen Road	Kilmainham Wood	Shredding	Dunboyne	PDM	ELV	HQ	Tankering	MDR
to:-				$\sqrt{}$					

Responsibility

The Sales Team are responsible for highlighting unacceptable wastes types to customers.

Drivers are responsible for checking all loads for unacceptable wastes prior to collecting the load.

The Operations Manager on site is responsible for identifying and highlighting non-conforming waste and checking all loads of waste brought into the facility. The Dunboyne weighbridge is self automated therefore a waste check by a weighbridge operator is not carried out as with other sites owned by Thorntons Recycling.

The Operations Manager is responsible for inspecting, assisting in documenting and informing the Environmental Manager and the Dunboyne Transport Department of any non-conforming waste which enters the facility.

The Environmental Manager is responsible for organising the safe removal of any non-conforming waste. The Environmental Manager is responsible for tracing the non-conforming waste and informing the Sales Team.

Associated Documents

EP04-F01A, Non-conforming Waste form

Procedure

The following process must be followed when handling all wastes;

- 1. The Sales Department provide all our account customers with a list of what we can and cannot accept at the facility. If in doubt about any waste type they contact the Environmental Department
- 2. The Customer Care centre processes the order and selects the waste description with the appropriate EWC Code and enters onto WIMS. If in doubt about any code or a waste type contact the Environmental Department
- 3. Drivers check the contents of the skip, bin or container on collection and report to the Transport Department if there is non-conforming waste. Transport in turn liaise with the Environmental Dept and will advise on how to proceed (if necessary Thorntons can arrange for an alternative collector).

Title:

Waste Acceptance procedure Dunboyne



Reference Date issued Revision EP13 30/10/2009 02

Relevant	Killeen Road	Kilmainham Wood	Shredding	Dunboyne	PDM	ELV	HQ	Tankering	MDR
to:-				$\sqrt{}$					

- 4. As the weighbridge at Dunboyne is self automated, drivers must confirm waste type on entrance to the facility. Should the driver need to change the waste type he can amend the waste type on the self automated bridge which in turn will update WIMS. The system has been set up to only allow the driver to weigh in acceptable wastes on sites.
- 5. When non-conforming waste is tipped the Operations Manager must complete the necessary non-conforming waste form and attach photos if required. He must move waste to the quarantine area if required. He must pass the non-conforming form is form to the Environmental Manager.
- 6. The Environmental Manager will contact the Sales Rep for the account. The appropriate Sales Rep is to be contacted so that they can in turn advise the customer of a fine, recharging, rejection of waste etc. Should the waste type description need to be changed on WIMS the Weighbridge Dept are informed and the Sales Rep who in turn advises the customer of this change and necessary changes in charges of applicable.
- 7. Paperwork is filed in the Environmental Department at Dunboyne

Title:

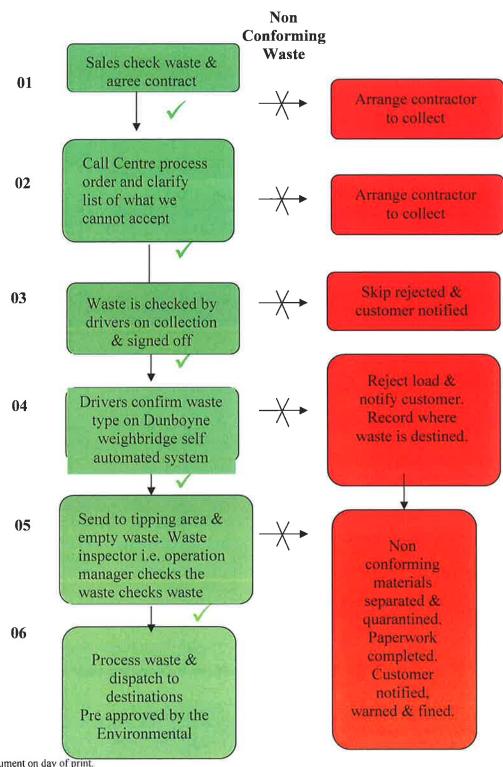
Waste Acceptance procedure Dunboyne



Reference Date issued Revision

EP13 30/10/2009 02

Relevant	Killeen Road	Kilmainham Wood	Shredding	Dunboyne	PDM	ELV	HQ	Tankering	MDR
to:-				V					





Engineer's Work Report

NOVA WEIGH

Block F, Unit 5, Maynooth Business Campus, Maynooth, Co.Kildare Tel: (01) 835 3084 Fax: (01) 835 1213

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CUSTOM		1.0763		CONTACT	111	Cielan	1	
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	ON SITE HOURS	TRAVEL TIME	MILEAGE	ORDER NO	EQUIPMEN	IT DETAILS		
DATE	ON SITE HOURS	1101722 111112		MAKE:	Precia	Molen		
570				MODEL:	7300 Y		300	
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		CALIBRATION		OTHER	Specify:			_
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TITLE		TITLE:	TITLE:				V º 138) 1 4
and the best of								



13 Ashbourne Business Park, Ashbourne Industrial Estate, Ashbourne, Co. Meath. Ph: +353 1 835 3084

WEIGHBRIDGE CALIBRATION TEST REPORT NO: S07497-C2

CUSTOMER:

Thortons Recycling

SITE ADDRESS:

SERVICE REPORT NO:

TYPE APPROVAL CERT NO: INDICATOR TYPE:

F-01-A-005

Dunboyne

DATA PLATE:

1300 (X222)

INDICATOR SERIAL NO:

Yes 04F746602

Co Meath

400

MANUFACTURER: TYPE:

Precia Molen

MINIMUM CAPACITY (kg): MAXIMUM CAPACITY (kg):

50000 20

SIZE:

Overground 18M

DIVISION (e) (kg): PRINTER SERIAL NO: TARE FACILITY:

N/A Disabled

LOCATION:

Entrance

Accuracy of Zero, Linearity/Hysteresis, Discrimination & Comparison Tests = *

Approximate Fest Interval (e)	MPE (e)	Actual Load (kg)	Indicator Up	Display Error (e)	True Error (e)	Indicator Down	Display Error (e)	True Error (e)	SL
ZERO	0.50	0	0	0.00	†	0	0.00		
2	0.50	40	40	0.00	0.00	44	0.20	0.20	
20	0.50	440	436	-0.20	-0.20	434	-0.30	-0.30	
500	1.0	10040	10034	-0.30	-0.30	10030	-0.50	-0.50	
1000	2.0	20040	20022	-0.90	-0.90	20020	-1.00	-1.00	SL1
1250	2.0	25040	25018	-1.10	-1.10	25016	-1.20	-1.20	
2000	2.0	40040	40016	-1.20	-1.20	40016	-1.20	-1.20	SL2
2170	3.0	43440	43410	-1.50	-1.50	43408	-1.60	-1.60	
SL1		20040							
SL2									
PASSED	ľ	Yes	Ĭ	**	**		*	**	SL - Substitut

NOT TESTED AT MAX CAPACITY, BALLAST NOT PROVIDED

REPEATABILITY TEST (Zero Track On)

50%-MPE(e)

2.0

>75%-MPE(e)

3.00

	Indicator	Indicator	Indicator
50%	25016	25018	25022
>75%	43408	43406	43412
PASSED	Yes		

ECCENTRIC LOAD TEST - MPE (e):

1.0

Position	1	2	3	4	5	6	7	8	9	10
Test Load	8040	8040	8040	8040	8040	8040				
Indicator	8036	8032	8030	8034	8032	8034				
Error (e)	-0.20	-0.40	-0.50	-0.30	-0.40	-0.30				
PASSED	Yes	SHARRA	// // // // // // // // // // // // //			N	· · · · · ·			

LOADCELL DATA

COMPARISON TEST

Number	6		
Make	Vishay/Revere		
Type			
Divisions	#N/A		
Test cert	#N/A		
Conformity	Yes		
PASSED	Yes		

Printer	N/A
Remote	Yes
PC	Yes
Other	N/A
PASSED	Yes

CUSTOMER CONTACT: Ted

email:

PHYSICAL CONDITION:

Good

AUTHORISED PERSON:

10000043 - Alan Byrne

TEST WEIGHTS USED :

PM1-28 DT1-17

CERTIFICATE NO:

T2211455 02830

CALIBRATION DATE :

28 June 2011

NEXT CALIBRATION DATE:

27 June 2012

SIGNATURE:

DATE: 01/07/2011



13 Ashbourne Business Park, Ashbourne Industrial Estate, Ashbourne, Co. Meath. Ph: +353 1 835 3084

WEIGHBRIDGE VERIFICATION TEST REPORT NO: S07497

CUSTOMER:

Thortons Recycling

TYPE APPROVAL CERT NO:

F-01-A-005

10000399

SITE ADDRESS:

Dunbovne

INDICATOR TYPE: DATA PLATE:

1300 (X222) Yes

Co Meath SERVICE REPORT NO:

11636

02F742651

MANUFACTURER:

Precia Molen

INDICATOR SERIAL NO: MINIMUM CAPACITY (kg): MAXIMUM CAPACITY (kg):

400 50000 20

TYPE:

Weighbridge

DIVISION (e) (kg): PRINTER SERIAL NO:

TARE FACILITY:

N/A Disabled

SIZE: LOCATION: 18m Out Bridge

Accuracy of Zero, Linearity/Hysteresis, Discrimination & Comparison Tests = *

Approximate Test Interval (e)	MPE (e)	Actual Load (kg)	Indicator Up	Display Error (e)	True Error (e)	Indicator Down	Display Error (e)	True Error (e)	SL	Discrimination	Comparison
ZERO	0.25	0	0	0.00		0	0.00				100000
2	0.25	40	40	0.00	0.00	41	0.05	0.05			-
20	0.25	440	442	0.10	0.10	444	0.20	0.20		Yes	N/A
500	0.50	10040	10034	-0.30	-0.30	10036	-0.20	-0.20			
1000	1.0	20040	20042	0.10	0.10	20044	0.20	0.20			THE COLUMN
1250	1.0	25040	25046	0.30	0.30	25046	0.30	0.30	SL1	Yes	Yes
2000	1.0	40040	40048	0.40	0.40	40048	0.40	0.40		Dis Right	000
2200	1.5	44040	44052	0.60	0.60	44052	0.60	0.60	SL2	Yes	Yes
SL1		20040									10000
SL2		40040								N=1:20	STREET
PASSED		Yes							SL - Substitute	Load	

NOT TESTED AT MAX CAPACITY, BALLAST NOT PROVIDED

REPEATABILITY TEST (Zero Track On) 50%-MPE(e) 0.30 >90%-MPE(e)

1.50

ROLLING LOAD TEST 1.50 MPE(e) 40000 Max Load

	Indicator	Indicator	Indicator
50%	25042	25048	25046
>90%	45200	45206	45212
PASSED	Yes		

	Indicator	Indicator	Indicator
→	32100	32106	32108
+	32110	32108	32104
PASSED	Yes		

ECCENTRIC LOAD TEST - MPE (e):

0.5

Position	1	2	3	4	5	6	7	8	9	10
Test Load	8040	8040	8040	8040	8040	8040			l()	
Indicator	8046	8044	8046	8034	8034	8040				
Error (e)	0.30	0.20	0.30	-0.30	-0.30	0.00				
PASSED	Yes									

MARKINGS LOADCELL DATA COMPARISON TEST

Number	6				
Make	Zemic				
Type	BM14G 30-50t				
Test cert	D09-05.21				
Divisions	3000				
Conformity	Yes				
PASSED	Yes				

Printer	N/A
Remote	Yes
PC	Yes
Other	N/A
PASSED	Yes

CE	Yes
SEALING	Yes
CLASS	Yes
GREEN M	Yes
PASSED	Yes

Leveling	N/A
High Res	Yes
Max +9e	N/A
Zero 4%	N/A
PASSED	N/A

OTHER TESTS

PHYSICAL CONDITION:

Good PM1-28 **AUTHORISED PERSON:**

10000043-Alan Byrne

TEST WEIGHTS USED:

DT1-17

CERTIFICATE NO:

T234278

VERIFICATION DATE:

07 July 2011

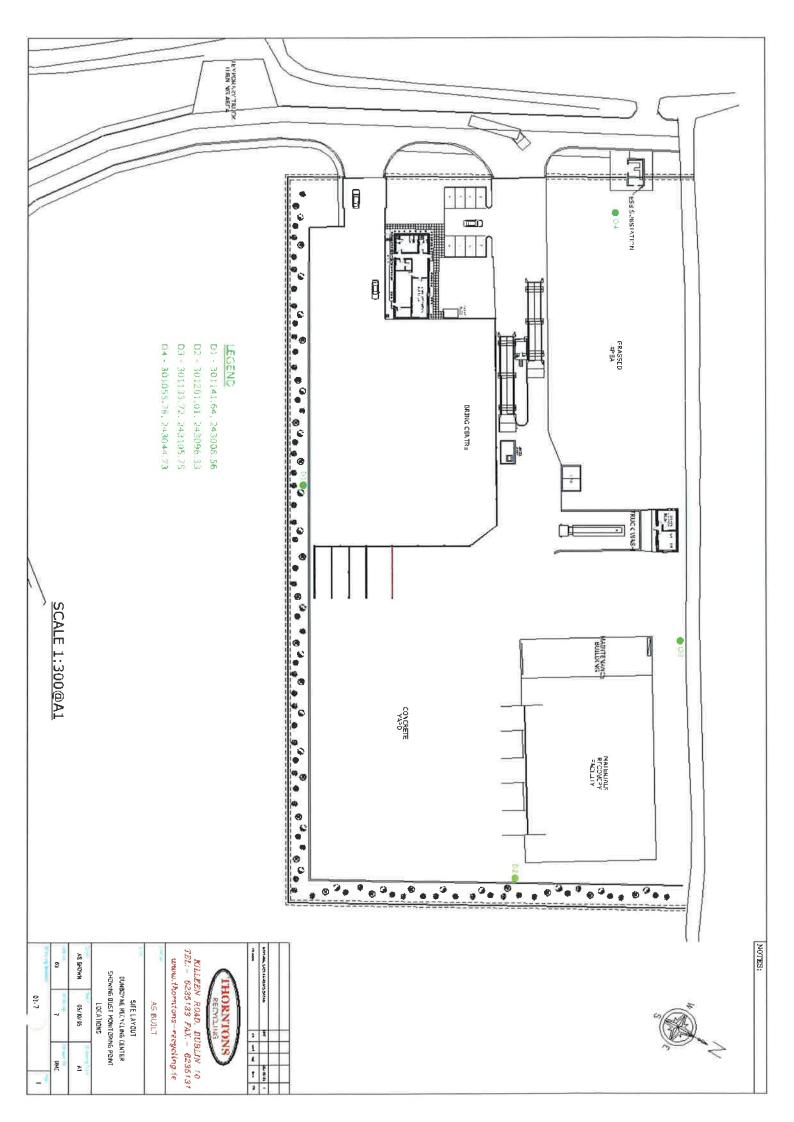
NEXT CALIBRATION DATE:

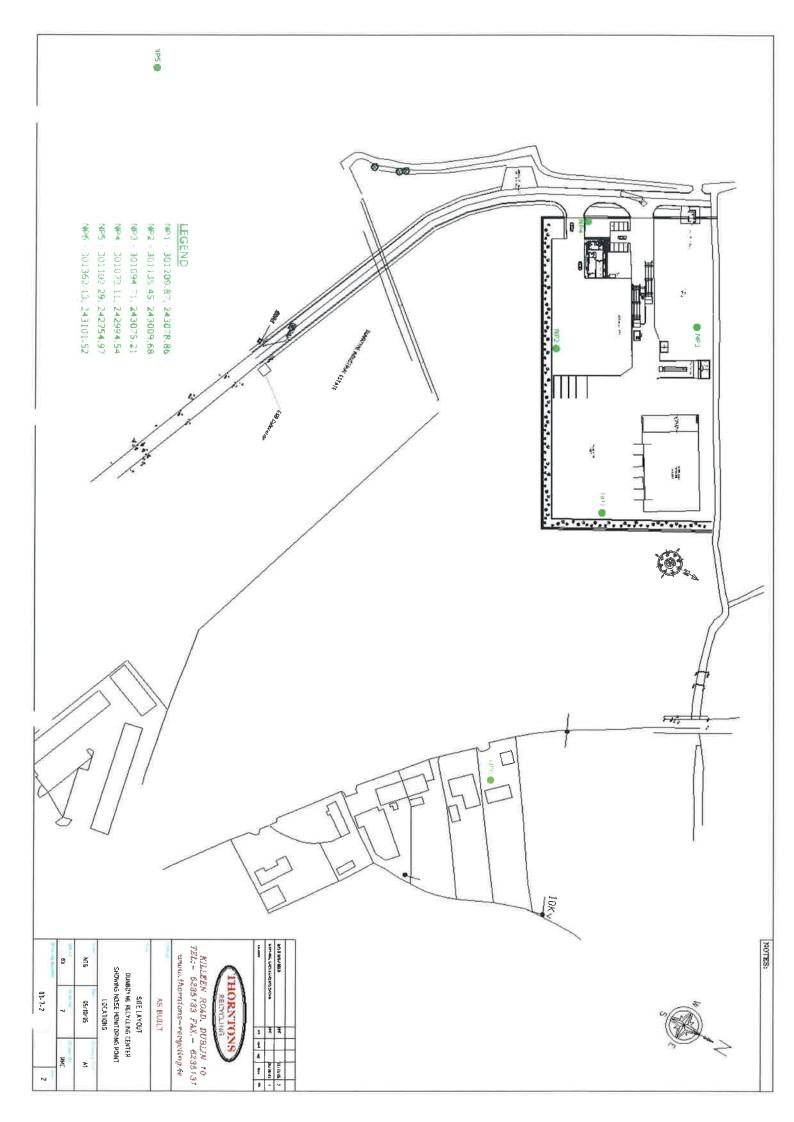
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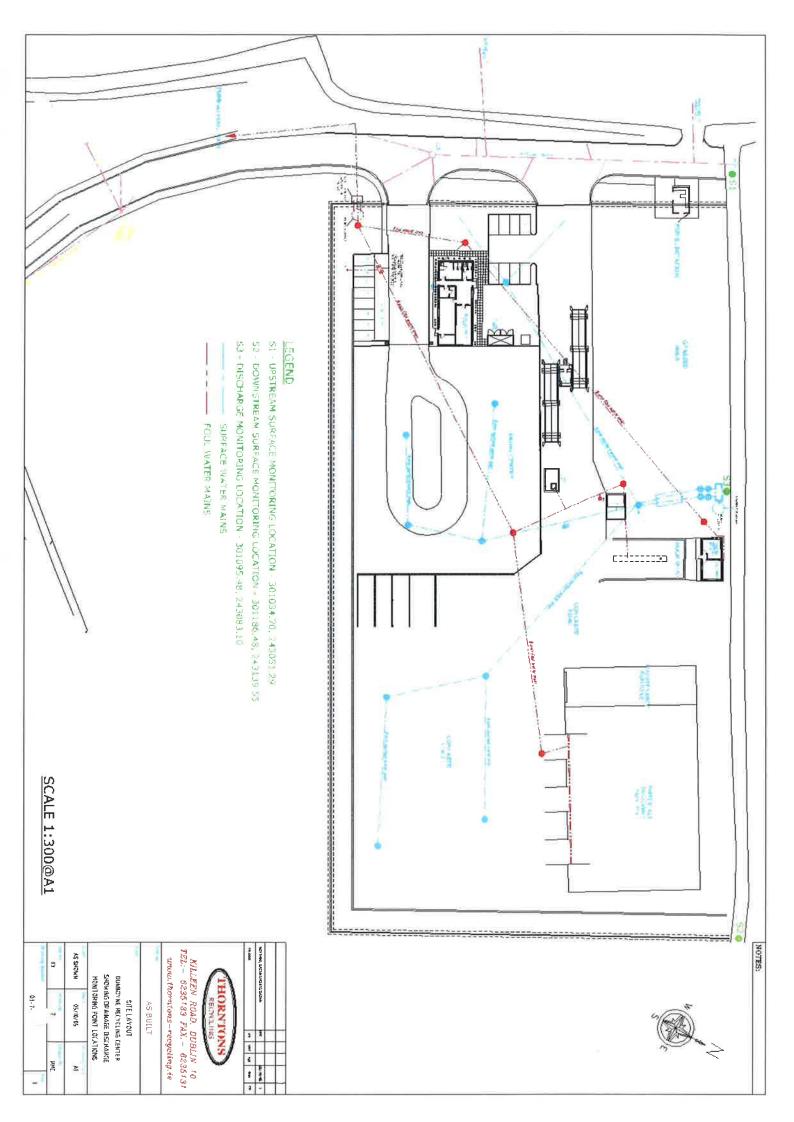
SIGNATURE:

DATE:

15/07/2011







Weekly Surface Water at S3							
Q1							
Date	COD	pH	Suspended Soilds				
EPA Trigger							
Levels	30mg/l	6-9	25mg/l				
04.01.12	<10	7.4	<10				
11.01.12	15	7.4	<10				
18.01.12	Sample	not tal	ken as site closed				
25.01.12	Sample	not tak	ken as site closed				
31.01.12	<10	7.4	<20				
10.02.12	<10	7.5	<20				
16.02.12	<10	7.7	28.8				
24.02.12	<10	7.6	<10				
28.02.12	<10	7.7	<10				
09.03.12	17	7.8	12				
15.03.12	<10	7.7	<10				
23.03.12	17	7.6	<20				
27.03.12	<10	7.8	<10				
Q2							
Date	COD	pН	Suspended Soilds				
EPA Trigger							
Levels	30mg/l	6-9	25mg/I				
06.04.12	<10	8	21				
13.04.12	62	7.8	208				
18.04.12	<10	7.7	<20				
27.04.12	<10	7.4	37				
04.05.12							
	<10	9.1	<10				
04.05.12	<10 <10	9.1 7.5	<10 <20				
04.05.12							
04.05.12 11.05.12							
	<10	7.5	<20				
11.05.12	<10 <10	7.5 9.4	<20 <10				
11.05.12 11.05.12	<10 <10 <10	7.5 9.4 7.4	<20 <10 <20				
11.05.12 11.05.12 18.05.12	<10 <10 <10 <10	7.5 9.4 7.4 8.3	<20 <10 <20 <10				
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11.05.12 11.05.12 18.05.12 18.05.12 25.05.12 25.05.12 01.06.12	<10 <10 <10 <10 10 <10 <10 <11 11	7.5 9.4 7.4 8.3 7.7 7.9 7.2 8.4	<20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20 <10				
11.05.12 11.05.12 18.05.12 18.05.12 25.05.12 25.05.12 01.06.12 01.06.12	<10 <10 <10 <10 10 <10 11 11	7.5 9.4 7.4 8.3 7.7 7.9 7.2 8.4 7.9	<20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20				
11.05.12 11.05.12 18.05.12 18.05.12 25.05.12 25.05.12 01.06.12 01.06.12 08.06.12	<10 <10 <10 <10 10 <10 11 10 <10 <10 11 10 <10	7.5 9.4 7.4 8.3 7.7 7.9 7.2 8.4 7.9 7.5	<20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20 <10				
11.05.12 11.05.12 18.05.12 18.05.12 25.05.12 25.05.12 01.06.12 01.06.12 08.06.12 15.06.12	<10 <10 <10 <10 <10 <10 <10 <10 <11 11 10 <10 13	7.5 9.4 7.4 8.3 7.7 7.9 7.2 8.4 7.9 7.5 7.8	<20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20 <10 <20				
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EPA Trigger			
Levels	30mg/l	6-9	25mg/l
06.07.12	28	9	<20
13.07.12	14	8.2	<10
20.07.12	<10	9.3	<20
27.07.12	<10	8.9	<10
03.08.12	<10	8.9	<10
10.08.12	<10	7.6	<10
17.08.12	15	7.8	<10
24.08.12	<10	9	<10
31.08.12	<20	8.7	<10
11.09.12	29	7.6	<20
14.09.12	<10	8	<20
21.09.12	17	7.8	<10
28.09.12	<10	8.9	<10
Q4			
W.T			
Date	COD	рН	Suspended Soilds
	COD	рН	Suspended Soilds
Date	COD 30mg/l	pH 6-9	Suspended Soilds 25mg/l
Date EPA Trigger			
Date EPA Trigger			
Date EPA Trigger Levels	30mg/l	6-9	25mg/l
Date EPA Trigger Levels	30mg/l 16	6-9 8.1	25mg/l <10 <20
Date EPA Trigger Levels 05.10.12	30mg/l 16	6-9	25mg/l <10
Date EPA Trigger Levels 05.10.12 12.10.12	30mg/l 16	6-9 8.1	25mg/l <10 <20
Date EPA Trigger Levels 05.10.12 12.10.12	30mg/l 16	6-9 8.1	25mg/l <10 <20
Date EPA Trigger Levels 05.10.12 12.10.12 16.11.12	30mg/l 16 34 20	8.1 8.4 8.2	25mg/l <10 <20 <10
Date EPA Trigger Levels 05.10.12 12.10.12 16.11.12	30mg/l 16 34 20	8.1 8.4 8.2	25mg/l <10 <20 <10
Date EPA Trigger Levels 05.10.12 12.10.12 16.11.12 23.11.12 30.11.12	30mg/l 16 34 20	8.1 8.4 8.2 9.0 8.6	<10 <20 <10 <10 <10 <10
Date EPA Trigger Levels 05.10.12 12.10.12 16.11.12 23.11.12 30.11.12 07.12.12	30mg/l 16 34 20 15 13 11	8.1 8.4 8.2 9.0 8.6 8.1	<10 <20 <10 <10 <10 <10 <10 <10 <10
Date EPA Trigger Levels 05.10.12 12.10.12 16.11.12 23.11.12 30.11.12 07.12.12 14.12.12	30mg/l 16 34 20 15 13 11 <10	8.1 8.4 8.2 9.0 8.6 8.1 7.3	<pre><10 <10 <10 <10 <10 <10 <10 <10 <10 <10</pre>
Date EPA Trigger Levels 05.10.12 12.10.12 16.11.12 23.11.12 30.11.12 07.12.12	30mg/l 16 34 20 15 13 11	8.1 8.4 8.2 9.0 8.6 8.1	<10 <20 <10 <10 <10 <10 <10 <10 <10







18 July, 2012

FBD House Tel +353 1 4093201 Bluebell Fax +353 1 4783108 Dublin 12

www.jlt.re

Ireland www.fbdbrokers.ie

> Padraig Thornton Waste Disposal Ltd and Thornton Recycling Centre Ltd Re:

To Whom It May Concern:

This is to confirm that we act as Insurance Brokers for the above client and that we currently hold the following covers in place on their behalf:-

Employers Liability:

Covering the legal liability of the Insured to employees for death or bodily injury or disease arising out of and in the course of their employment by the Insured in the business as described (Waste Collection, Recycling and Disposal and Property Owners) during the period of Insurance.

Insurers: Policy No.: FBD plc and QBE Insurance (Excess Layer) 00433053/04/01 & Y039364QBE0210A

Renewal Date:

1st July 2013

Limit of Indemnity:

€20,000,000 any one occurrence inclusive of all costs and expenses.

Public / Products Liability:

Covering the legal liability of the Insured for accidental bodily injury to third party persons or accidental damage to third party material property arising in connection with the business and subject to the limit of indemnity specified. Including legal liability arising out of goods sold or supplied.

Insurers:

FBD plc and QBE Insurance (Excess Layer)

Policy No.:

00433053/04/01 & Y039364QBE0210A

Renewal Date: 1st July 2013

Limit of Indemnity:

Public Liability €12,500,000 any one accident Products Liability €12,500,000 any one period

Covers the Insured's Liability to Third Parties for vehicles being used in connection with the insured's business. Personal Injury cover is unlimited and Third Party Property Damage limit is €6,500,000 and €30,000,000 for private cars.

Insurers:

FBD Insurance Pic and QBE Insurance (Excess Layer on MTTPD)

Policy No:

00433053/22/01 & Y039361QBE0210A

Renewal Date:

1st July 2013

All policies include Indemnity to Principals Clause applies to all policies.

We trust that this is in order but if you require further details, please do not hesitate to contact the undersigned.

Yours sincerely

Fergal Britton Service Executive **FBD Brokers**



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Guidance to completing the PRTR workbook

AER Returns Workbook

KENCE TEAR	2012	N 10		0.140	7 0
ompany Name	Padraio Tho	ornton Waste	Disposal Limited		
Facility Name	Padraig Tho	omton Waste	Disposal Ltd	THE RESERVE	
cation Number \	N0206				100
cence Number \	N0206-01				12.00
	ompany Name I Facility Name I cation Number I		ompany Name Padraig Thornton Waste Facility Name Padraig Thornton Waste cation Number W0206	ompany Name Padraig Thornton Waste Disposal Limited Facility Name Padraig Thornton Waste Disposal Ltd cation Number W0206	ompany Name Padraig Thornton Waste Disposal Limited Facility Name Padraig Thomton Waste Disposal Ltd cation Number

Waste or IPPC Classes of Activity No. class_name 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 4.13 produced. Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule: Repackaging prior to submission to any activity referred to in a 3 12 preceding paragraph of this Schedule. Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending 3,13 collection, on the premises where the waste concerned is produced Exchange of waste for submission to any activity referred to in a 4.12 Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation 4.2 processes). 4.3 Recycling or reclamation of metals and metal compounds
4.4 Recycling or reclamation of other inorganic materials. Address 1 Dunboyne Industrial Estate Address 2 Dunboyne Address 3 Co Meath Address 4 Meath Country Ireland Coordinates of Location -6.47927 53 4281 River Basin District IEEA NACE Code 3832
Main Economic Activity Recovery of sorted materials
AER Returns Contact Name Mercedes Kavanagh AER Returns Contact Email Address mercedes@thorntons-recycling.ie AER Returns Contact Position Mercedes Kavanagh AER Returns Contact Telephone Number 016202208 AER Returns Contact Mobile Phone Number 0868241034
AER Returns Contact Fax Number 01 6235131 **Production Volume** Production Volume Units Tonnes Number of Installations Number of Operating Hours in Year Number of Employees 1976 User Feedback/Comments Web Address www.thorntons-recycling ie

2. PRTR CLASS ACTIVITIES

Activity Number	Activity Name
50 1	General
5(c)	Installations for the disposal of non-hazardous waste
50.1	General

3. SOLVENTS REGULATIONS (S.I. No. 543 of 200	02)
Is it applicable?	No
Have you been granted an exemption?	
If applicable which activity class applies (as per	
Schedule 2 of the regulations) ?	
Is the reduction scheme compliance route being	
used ?	

4. WASTE IMPORTED/ACCEPTED ONTO SITE	Guidance on waste imported/accepted onto site
Do you import/accept waste onto your site for on-	
site treatment (either recovery or disposal	
activities) ?	

This question is only applicable if you are an IPPC or Quarry site

4 1 RELEASES TO AIR

	RELEASES TO AIR		Please enfer all quantities	o this section in KGs				
	POLLUTART	METHOD					CHANGE	
		Method Used	10	D2	D3	D4	A THE PARTY OF THE	
Age Armer of	No.	AAA/A FE					& (Acodetful	F (Fugible)
		WALCE IN THE LOOK CHESTORATION OF LIPSCHOOL	Emission Point 1	Emission Poult : Emission Point 3 Emission Point 4	Emission Point 3 Emis	Sion Point 4 Fitte	stall KC/Vear KG/Year	MUVEN
86 - Particuletti matter (PM10)	PM to Purteularte Malter	O Composite sample measured in reprint/Navy using Standard Method M OTH VID2119	0 0000043	0.00000078	CADDIDOO O	9800000	CONTRACTOR OF	
	Solve to the best delication and the Bolliston Mirror of Solves and the solves of			0	100000	2200000	86100000	0.00

	RELEASES TO AIR			date office all ou still as	fighting and long in King.				
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		**	Withing Used	-0	02			1	
144 Australia		-						A. (Accudental	(Fugitive)
THE STATE OF THE S	FAIX	M/C/E Melriod Code	CHENGRADON OF DIRECTORON	Emission Point 1	Emission Point 2 Enussion Point 3 Emission Point 4	Emission Point 3 Emis	Nous Pourt 4. 1 (1)	Jotal) KG/Year KG/Year	Per U Yearst
			30 Composite stample						
			measured in migrit 2/day						
			using Standard Method						
Dust Deposition	2		VDI2119	00	0.0	00	NAW.	1000	
							20	00	00

SECTION C : REMAINING POLLUTANT EMISSIONS (As required in your Licence)

POLICE P	FOLLUTANT MATERIAL MACTING Click MACTI				RELEASES TO AIR		The second second	Please enter all evantities	in this section in KGs	The second second				
Machined Cibidy Description on Description Emission Point 1 Emission Point 2 Emission Point 4 Informat Microsoft Professional Profession Point 5 Emission Point 4 Informat Microsoft Profession Profession Point 5 Emission Point 4 Informat Microsoft Profession Profession Point 5 Emission Point 4 Informat Microsoft Profession Prof	Military			POLLUTANT			METHOD						VICTORIA	
MUCHE Method Clidge Composite sumple Compos	MUCTE Method Cicido Designation of Description in Conception and Cicido						Method Used	10	02	60	100	-		
Mountain Note Not	Avoing payanasi using a mapping the mapping of the mapping payan point 2. Emission Point 3. Emission Point 4. I Clotal Midward Print Anni Midward Midward a mapping and a mapping payana and payana an		Postsycon Pas			STORY TO CHANGE OF THE PARTY OF			CENTRAL SOCIETY CO.	9		×	(Accidental)	I trugitive
Comparing American Comparing Comparing American Comparing Comparing American Comparing Comparing Comparing Comparing Comparing Compari	Comparing Americal Comparing Com		The state of the s		ALMIN .	MALLE MARKING COD	the standard of Description	Emission Found	Entrastion Point 2	Apprehension Premit of	Ethicagor Point 4	Clotal MCZ Tetal P.	California	PUSTVEST
Using Standard Multiple 0046 0051 0049 0039 0145 VDI2119	W OTH VDI2119 VDI2119 V VD						30 Composite sumple neurstreat in reglecolitary							
M OIH VD[2119 0046 0.051 0.049 0.039 0.185	M OIH VDI2119 0046 0.051 0.049 0.029 0.185						Using Standard Method							
		210		Dust			VD(2119	0 046		0.049	0.039	0.185	19.0	0.0
				Sylppi a row by double clicking on the	Pollutani Nama (Column B) than click the dalate button									

Additional Data Requested from Landfill operators

or the purpose of the National Investory or Greenhouse Gasea, landill operators are requested to provide summary data on handill gas (Metheres) enced or unlike on becompany for eights of the data within agented of province should be in got four five fresh with making (Ch4) and also on the continuent unter Tricual (Chy to Section X, Section X, Section 2, Section 2, Section 2, Section 2, Section 3, Sectio

Patrang Thornton Wante Disposal Ltd Landfill:
Please enter summary data on the quantities of methane flared and / or utilised T (Total) kg/Year lotal estimated methane generation (as por ane mount)
Methane figure
Methane figure
Methane unissed in eliginals
Net methane emission (as reported in Section)

(Total Flaring Capacity)

Facility Total Capacity m3 per hour

Method Code

MICIE

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	s submitted under AER / PKTII Reporting as this only concerns, Helmans from your facility	113
The set of	Outs on ambient examinating of atom Varieties water or groundwater, conducted as bast of your licensor registrowers, assisted NOT to Please enter all quantities in this section in KGs.	COAN
-EASES TO WATERS Link to previous years emissions data	NA A SECTOR SPECIFIC PRITR POLLUTANTS POLITIZANT POLITIZANT	
4.2 RELEASES	SECTION A: S	

	RELEASES TO WATERS		0	com an annowed incompanied of informations when it groundwater, conducting an and of your femines along the submitted of the section in KGs. Please enter all quantities in this section in KGs.	Please enter all quantities in this section in KGs.	once requirements, should s in this section in K	INOT be autenitied under AER / PI	Til Reporting a
	COLLUIAN			Administration of the second			QUANTITY	
Mil. Hamonal	Marille	MONE	Method Code	Method Gode (Designation of Description	Emission Point 1	T (Total) KG/Year J	T. (Total) KGYear A (Accidental) KGYear F (Fugitivit) KGYear	HIRINI KG/Ye
	Objection (bs-cl.)	2	EE.	Standard: McSkipis, by the commission of weeks some Ed	51.5	1155	00	00
	Corporand comploanting (in Ga)		•	Standards Adelboas for the exemplifies of Wigner and workforches #PDB 20th Ed	0,01	1 001	00	00
	Physiologia pool Gr		ore,	Stradents Alchaet, for the geometrics of sector and windercape, 9256 20th Ed	80:0	8 0.08	00	0 0
	Sing and compounds (its 20)		ALC:	Stepting: Methods to the committee of wicht and with the method of wicht and with the method of the country of	100	1000		

SECTION B : REMAINING PRTR POLLUTANTS

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ion in KGs	סה	G/Year A.(00
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Please enter all q		Emission Point 1	
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Pallquini No	Nime	MOE	ANCIE Method Corle	Organition of Designed Emission Point 1	Emission Point 1	Emission	Emission Point 2 T (Total) KG/Year		A (Accidental) KGYear	T PX	F (Fugitive) KG/Year
302	1800	3	## E	Shadmic Milhalb, for the equalities of legals shad witherables, RRIG 20th Ed		7.9	0.0	7.9		0.0	00
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- Defe	Seighmung Seiles		Ē	Standards Milhout for the constitution of teaching and work-some APTHS 2016 St.		13.9	0.0	13.9		0.0	0.0
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Link to previous years emissions date

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THE RESIDENCE AND ADDRESS OF THE PERSON NAMED IN	OFFSITE TRANSFER OF POLLUTANTS DESTINED FOR WASTE-WATER TREATMENT OR SEWER	ATER TREATMENT OR	SEWER		Please enfor all quantities in this section in KGs	es in this section in	NGB		
	POLLUTANT			METHOD			QUANTITY		
		The same of the sa		Method Used					
No. Action (I)		MACAE	Methodicode	Designation of Description	Emission Point 1	T.(Total) HG/Year		ATAccidentati KGryelit F (Fugitive) KG/Year	aptive; KG/Yea
				Standard method for the					
				examination of water and					
	Chlorides (as Ci)	2	PER	wastewater APHA20th Ed	104 4	4 4	104 4	0.0	0.0
				Standard method for the					
				examination of water and					
	Total phresphorue	N	PER	waslewater APHA20th Ed	0	0.87	0.87	0.0	0.0
				Standard method for the					
				examination of water and					
	Total organic carbon (TOC) (as (otal C or COD/3)		PER	wastewater APHA20th Ed	83 18	18	83 18	00	0.0
				Standard method for the					
				examination of water and					
	Phenols (as total C)	M	PER	wastewater APHA20th Ed	0	0.17	0 17	0.0	0.0
						0.0	0.0	0.0	0.0

" Seloci a row by double-elicking on the Polluturi Name (Column B) thun click the delete button

SECTION B. REMAINING POLLUTANT EMISSIONS (as required in your Licence)

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Substant (NS)		30	Medi	PW!			
Substant (No. 1940)		No.					
2 2 2			Metriod Code: Lengthatton of Littleripion	Designation or Description Emission Point 1	L LOCAL PURE PORC	A (Accidental) KGPrear F (Fugitive) KGPrear	F (Fugitive) KG/Yea
DE 00 85			Standard method for the				
300 300 300			examination of water and				
9 8			PER wastewater APHA20th Ed	223 5	223 5	00	00
3 8			Standard method for the				
₽ P			examination of water and				
940		M. P	PER wasteware APHAZON Ed	249 5	249 5	00	00
940			Standard method for the				
240			examination of water and				
	Spidos palatical Solids	d n	PER wastenator APHAZON Ed	6.66	6 86	0.0	00
			Standard method for the				
			examination of water and				
	Nitrate (as N)	d W	PER wastewater APHA20th Ed	2 39	2 39	0.0	00
			Standard method for the				
			examination of witter and				
70	Ammonia (as N)	M. P	PER wastewater APHA20th Ed	14 54	14 54	0.0	00
			Standard method for the				
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	Mineral orls	d W	PER wastewater APHA20th Ed	29 16	29 16	0.0	00
			Standard method for the				
			examination of water and				
	Sulphale	M. P.	PER wastewater APHA20th Ed	1337 0	1337 0	00	00
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			examination of water and				
Acres .	Determination of MBAS	2	PER wastewater APHA20th Ed	0 42	0.42	00	00
			Standard method for the				
			evanninglosi of water and				
474	Total boson matala	2	PER wastewater APHA20th Ed	0.25	0.25	00	0.0

Link to previous years emissions data

	RELEASES TO LAND		Please enter all quantities in this section in KG	
HOG	HELUTANT	METHOD		CUANTITY
		Melaboriosegi		
N- 10- Or I I I I I I I	Vame	F Mathod Code	Emission Point 1.	A (Accidental VC Notes

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

R	ELEASES TO LAND		Please enter all quantities in this section in KGs
POLLUTANT	CONTRACTOR OF THE PARTY OF THE	METHOD	OVANTITY
		Melrod Used	
Name Name	MICKE	Method Code Description or Description	Emission Point 1 T (Total) KG/Vear

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

			Quantity (Tonnes per Year)		Wastu		Method Used		Haz Wasile Name and LicencePorms No of Nest Destination Facility Non-Haz Wissile Name and LicencePerms No of Riebover/Disposer	Haz Vresige Adoress of Neal Descriation Facility Non Haz Wiesigs Address of Recover/Describe	Name and Losmas / Permit No. and Address of Final Recoverer I Desposes (HAZARDOUS WASTE ONLY)	Actual Address of I Is Final Recover (HAZARDOUS V	y / Deposal S
Transfer Dechnotion	European Waste	Massedania		Description of Waste	Treatment Operation	MUE	Hathard I brand	Location of Treatment	PTWOL TIA Thomasea	Unit 51 Henry			
Within the Country	15 01 04	No	0.74	meţallic packaging	R4	u	Weighed	Offsets in Ireland	Recycling MDR,WFP-DC- 10-0021-01	Road Parkwest Business Park Dublin 12 Ireland			
Within the Country	20 01 23	Yes	37 13	discarded equipment containing chlorofluorocarbons other wastes (including mixtures of materials) from mechanical treatment of	R13	м	Weighed	Offsde in Ireland	ERP Contract ERP Contract	ERP Contract Ireland	ERP Contract ERP Contract Ireland	ERP Contract	Ireland
Nithin the Country	19 12 12	No	19.42	other westers (including matures of materials) from mechanical treatment of	R5	М	Weighed	Offsite in Petend	Bord na Mona Drahid Landfill,W0201-03	Orehid "Co Kildare Ireland			
Within the Country	19 12 12	No	41.74	wastes other than those mentioned in 19 12 11 other wastes (including micrures of materials) from mechanical treatment of	R5	м	Weighed	Offste in Reland		eland			
Within the Country	19 12 12	No	29.16	wastes other than those mentioned in 19 12	RS	u	Weighed	Offsite in Ireland	Bord na Mona Drehid Landfill W0201-03 PTWDL T/A Thorntons Recycling Killeen	Drehid Co Kildare Ireland Killeon Road Ballyfermot, Dublin, 10 I			
Within the Country	17 09 04	No	282 52	09 02 and 17 09 03	R13	М	Weighed	Offsite in Ireland	Road W0044-02	reland Pigeon House			
Vithin the Country	19 12 02	No	9 72	ferrous metal	R4	м	Weighed	Offsate in Ireland	Hammond Lane WP98107 PTWDL T/A Thorntons Recycling Killeen	Roa "Dublin Ireland Killeen Road Ballylarmot Dublin, 10, I			
WathIn the Country	19 12 02	No	14 02	ferrous metal	R4	M	Welched	Offsite in Ireland	Road,W0044-02 National Recycling/Cummins	reland Station Road Clondalkin Dublin			
Within the Country	19 12 02	No	1 65	ferrous metal	R4	W	Weighed	Offsite in Ireland	Metals WPR002 Rehab Glassco Ltd,WFP-KE-	22 22 ireland Osberstown Industrial Estata Naas Co			
Vithin the Country	15 01 07	No	23 34	qiasa packaging	R13	м	Weighed	Offsite in Ireland	08-0357-01 PTWDL T/A Thorntons Recycling PDM	Kildare_freland OldmiBown Kill Co			
Vithin the Country	19 12 07	No	61 68	wood other than that mentioned in 19 12 06	R3	M	Weighed	Offsite in Ireland	0061-01	Kildare Ireland			
Vithin the Country	19 12 09	No	106 16	minerals (for example sand, stones) discarded electrical and electronic	R5	М	Weighed	Offsite in Ireland	Bord na Mona Drehid Landfill,W0201-03	Drehid "Co Kildare keland			
Vithin the Country	20 01 36	No	96	equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	R13	м	Weighad	Offsite in Ireland	ERP Contract ERP Contract PTWDL T/A Thorntons	ERP Contractlireland Killeen Road,Ballyfermot,Dublin,10.I			
Vithin the Country	19 12 07	No	5 86	wood other than that mentioned in 19 12 06	R3	М	Weighed	Offsate in Ireland	Recycling Killsen Road W0044-02 PTWDL T/A Thorntons Recycling MDR WFP-DC-	reland Unit 51 Henry Road,Parkwest Business			
Vithin the Country	15 01 05	No	1.56	composite parkaging	R13	м	Weighed	Offsite m Ireland	10-0021-01 PTWDL TAThersons Recycling Killeen	Park Dublin 12 Ireland Road Ballyfermot Dublin 10 I			
Varin the Country	20 01 02	No	2 66	qiass	R13	М	Weighad	Offsite in Ireland	Road_W0044-02 PTWDL_T/A Thorntons Recycling_MDR,WFP-DC-	reland Unit 51 Henry Road, Parkwest Business			
Vehin the Country	20 03 01	No	56.82	mived municipal wasts	R13	M	Weighed	Offsite in Ireland	10-0021-01 Bord na Mona Drehid	Park, Dublin, 12, Ireland			
Vithin the Country	20 03 01	No	2138	mixed municipal waste	D5	M	Weighed	Offsite in Ireland	Landfill W0201-03 PTWDL T/A Thorntons Recycling Killeen	Drehid_Co Kildare_Ireland Killeen Road Ballyfermot,Dublin,10,I			
Vithin the Country	20 03 01	No	50.78	mixed municipal waste	R13	:M:	Weighed	Offsite in Ireland	PTWDL T/A Thorntons	reland Killeen			
Vithin the Country	15 01 03	No	45.04	wooden packaging	R3	М	Weighed	Offsite in Ireland	Recycling Killeen Road,W0044-02	Road, Ballyfermot Dublin, 10.1 reland			
Vithin the Country	20 02 01	No		biodegradable waste	R13	М	Weighed	Offsite in Ireland	WFPMH-9-0004-01	Newtown, Rathganley, Kilcock Co Meath Ireland			
Vahin the Country	170504	No	32 88	soft and slones other than those mentioned in 17 05 03	R13	М	Weighed	Offsite in Ireland	WMP-2007-22 PTWDL T/A Thorntons	Fedown Jonneshill Co Meath Ireland Unit 51 Henry			
Vithin the Country	20 01 39	No	7 1	plastics	R13	М	Weighted	Offsets on tretand	Recycling MDR,WFP-DC- 10-0021-01 PTWDL T/A Thamlons Recycling Killeen	Road Parkwest Business Park Dublin, 12 Ireland Killeen Road, Ballyfermol Dublin, 10 I			
Vithin the Country	20 01 39	No	2 38	plastics	R13	M	Weighed	Offsite in Ireland	Road,W0044-02 PTWDL T/A Thorntons Recycling MDR,WFP-DC-	reland Unit 51 Henry Road, Parkwest Business			
Within the Country	15 01 02	No	4 68	plastic packaging	R13	М	Weighed	Offsite in Ireland	10-0021-01 PTWDL T/A Thorntons Recycling Killeen	Park Dublin,12 Ireland Kifeen Road,Ballyfermot,Dublin,19,I			
Vilhin the Country	19 12 10	No	43.74	combustible waste (refuse derived fuel)	R1	М	Weighed	Offsite in Ireland	Road W0044-02	reland Kinnesgad ,Co west meath			
Vithin the Country	19 12 10	No	90.40	combustible waste (refuse derived fuel)	R1	м	Weighed	Offsite in treland	Laqan Cement ,P0487-05	.Co west meath treland			
Vithin the Country	19 12 10	No	4231 78	combustible waste (refuse derived fuel)	R1	M	Weighed	Offsite in Ireland	Irish Cement P00030-04 PTWDL T/A Thorrsons Recycling MDR.WFP-DC-	Platin Dulleek, Drogheda, Co Louth Jireland Unit 51 Henry Road, Parkwest Business			
Vithin the Country	15 01 01	No	32.9	coose and cardboard sackaging	R13	MK:	Weightd	Offsite in Ireland	10-0021-01 PTWDL T/A Thomlons Recycling MDR,WFP-DC-	Park Dublin 12, Ireland Unit 51 Henry Road Parkwest Business			
Within the Country	20 01 01	No	30 36	paper and cardboard	R13	М	Weighed	Offsita in Ireland	10-0021-01 PTWDL T/A Thomlons Recycling Killeen	Park, Dublin, 12 Jreland Killeen Road Ballyfermot, Dublin, 10 J			
Vithin the Country	20 01 39	No		plastics	R13	(M:	Weighed		Road,W0044-02 Textile Recycling Not	reland . Greenogue Business Park,Saggart.Co Dublin			
Vithin the Country	20 01 10	No	4 13	clothes	R13	M	Weighed	Offsite in Instand	Applicable	Ireland			