



1 Fisherman`s Cottages
Querrin
Kilkee
Co Clare

27th April 2020

Waste Licensing Section
Environmental Protection Agency
Johnstown Castle
Johnstown
Co Wexford

Re Waste Licence W-0045, KeyWaste Ltd, Greenhills Road, Walkinstown,
Dublin 12

Sirs,

I, have been requested by the directors of KeyWaste Ltd, holders of existing waste licence W-0045 from the EPA which mainly covers the various activities in providing domestic and commercial waste management services, to request an amendment to this licence. The company, in recent years, has been providing a collection and disposal services for hazardous clinical waste, mainly to nursing and care home locations, using the end disposal facility at SRCL Ltd, Beech Road, and Naas Road, Dublin as approved by EPA licence W 0055. This service is provided in parallel to commercial waste disposal to mainly nursing homes and involves the provision of 770litre UN approved, yellow, lockable wheelie bins for storage of the following waste types:

EWC codes 180202,180103, 180104,180106 and 180106

The wheelie bins when full, are collected, exchanged for empties on a like for like number and transported to the SRCL facility for treatment and disposal.

Prior to the outbreak of the Carona Virus, this was a low volume activity, with collection of one vehicle collecting the wheelie bins to a maximum of

12 units. The average weight by volume of a typical wheelie bin of clinical waste is usually 90/100kgs.

I should mention my background in this industry sector, hazardous clinical waste, extends over 30 years, both in site planning permissions, licencing, waste carriers permit and service provision, originally at the SRCL site and later with Initial Medical, in Ireland, UK and Europe. In recent years my services are mainly hospital clinical waste audits and various international projects.

The outbreak of the Corona Virus in the nursing home and care home sector, has now resulted in a dramatic demand to Key Waste to provide additional collection / disposal services. Single sites are now generating multiple weekly collections from what was 1 wheelie bin to where virus has occurred and growth of ppe disposal requirements, might be 10 bins.

What KeyWaste require is to provide temper on site storage of up to 50 full wheelie bins for say 48 hour time scale before being transferred to SRCL for disposal. The wheelie bins are locked and as I say above, UN approved and therefor cause no environmental risk to staff or the site infrastructure and I propose a designated hard core holding area.

The other reason for this request is that SRCL are experiencing a spike in daily vehicle deliveries and using a small van collection service is placing pressure on the SRCL Beech Road receiving area is being controlled to accommodate the SRCL hospital , clinics delivery fleet , plus the Initial Medical fleet of small vans , currently 12 vehicles .

If agreement can be reached with your Agency , I will be retained by KeyWaste to monitor all aspects of best practice , compliance in managing the service . I am familiar with all SRCL procedures .

This growth in clinical waste generation by the care home sector is evident from news reports daily and will be a factor for some time .

I am available to discuss this request by phone 087 6985926 or email: brian@rogersconsultants.ie

Yours sincerely,

Brian Rogers



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