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Waste Licensing

Environmental Protection Agency

PO Box 3,000

Johnstown Castle Estate

Wexford

3<sup>rd</sup> February 2001

Re: Waste Licence W0045-01

Dear Sirs,

Key Waste Management Ltd is an established waste management company operating from a licensed segregation / transfer station at Greenhills, Dublin 12. Waste collection / disposal services are provided to domestic, commercial and healthcare locations.

An issue has arisen in recent weeks in our ability to service our existing clients in the healthcare sector. Due to the ongoing Covid 19 pandemic, clinical waste arising at healthcare locations has dramatically increased.

KeyWaste collects this waste from clients and transports it directly to a dedicated licensed treatment and disposal facility operated by SRCL Ltd at Beech Road, Naas Road Industrial Estate, Dublin 12 (Licence W0055-02).

This is the only facility treating clinical waste in the Republic of Ireland. Because of the larger volumes now arising in the healthcare sector, the SRCL facility is having difficulties coping with the waste volumes, which is causing usual scheduled delivery vehicles to be detained outside the facility for up to seven hours per day. This is causing disruption to customer services and additional costs to the company. The collection, delivery of clinical waste, normally can only be carried out during standard daytime business hours.

Therefore, our request to the agency, is for a temporary derogation to the KeyWaste licence to allow for the temporary storage of clinical waste, stored in UN approved locked containers, which will be held in a secure area at the KeyWaste transfer station site.

The proposed duration of storage we estimate will not exceed 48 hours.

The volumes we expect are approximately 80 bins per day .Details of each bin, will be supported by relevant WTF documentation.

As stated, this proposed activity, will be on a secure section of our transfer station site and will be separate and not impact on our other domestic / commercial waste streams.

The categories of clinical waste we currently service are as set out in the

Listed below EWC codes:

- 180101 : waste arising from care, diagnosis, treatment or prevention of disease in humans
  - 180101 : sharps
  - 180103\* : waste whose collection and disposal is subject to requirements to prevent infection
  - 180108\* : cytotoxic and cytostatic medicines
- 180110: dental amalgam

The company, will continue to monitor the disposal services available at the SRCL facility.

Should you require any further information in respect of above, please contact Mc Loughlin ( KeyWaste Compliance Co-ordinator ) , as per copy letter attached or healthcare waste consultant Brian Rogers (Rogers Consultants) 087 6985926.

Yours faithfully



Brian Rogers

# KeyWaste

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Yours sincerely,

*Ciara McLoughlin*

Ciara McLoughlin  
Compliance Co-ordinator