

## ATTACHMENT C.1 WASTE PREVENTION

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APPLICANT: Recordati Ireland Ltd.  
APPLICATION NO.: LA006986 / P0476-03  
REV: For Issue

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### Introduction

Article 12(1)(h) of Directive 2010/75/EU requires that licence applicants provide a description of “measures for the prevention, preparation for re-use, recycling and recovery of waste generated by the installation”.

### Description of Measures

Various conditions and reporting obligations of the current Industrial Emissions Licence (IEL) along with regional and national policies, require that waste generation is avoided and/or minimised where possible. This approach conforms with the policies of Ireland’s National Waste Prevention Programme.

Specifically, it is an objective of the site to observe the Waste Hierarchy as outlined in Figure 1.



Figure 1 Waste hierarchy

Please see SOP 1580WM-01 'Waste Management' (attached) for further details on waste management onsite.

There is a rolling action plan under the Environmental Management Programme onsite to reduce waste production per unit product produced on a year-to-year basis.

This information is reported annually to the EPA via the Annual Environmental Report and is summarised as follows over the preceding couple of years:

- 2019
  - **4.65%** decrease in kg waste generated/kg product produced
- 2020
  - **10.4%** decrease in kg waste generated/kg product produced

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Procedure

**Waste Management**

 Document No: **1580WM-01**

Change Control No:

Supersedes: 1580SWC-1 and 1580HWC-2

Distribution List: 1) EHS 2) Production

## 1 PURPOSE

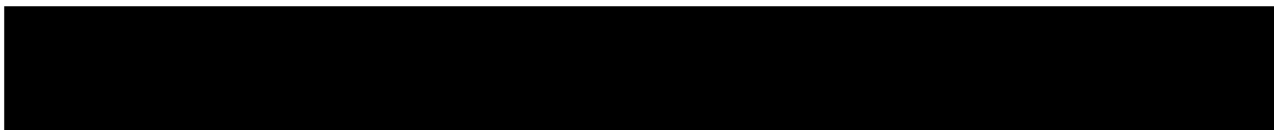
The purpose of this procedure is to ensure that waste is stored, handled and managed in accordance with IE licence conditions and to maintain waste inventories on site for contribution to environmental performance planning, evaluation and reporting.

## 2 SCOPE

This procedure applies to all waste material generated within the site as defined by the red-line boundary indicated on Figure 1 of the Environmental Management Manual.

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Approved By:	[REDACTED]	[REDACTED]	Date:	



### 3 RESPONSIBILITY

The Plant Manager (EHS Coordinator) in conjunction with the Environmental Specialist is responsible for implementing this procedure.

### 4 DEFINITIONS

ADR Regulations - refers to the European Communities (Carriage of Dangerous Goods by Road and the use of Transportable Pressure Equipment) Regulations 2011 (S.I. 349 of 2011) and Amendments.

EPR Environmental Performance Reporting

IE Industrial Emissions

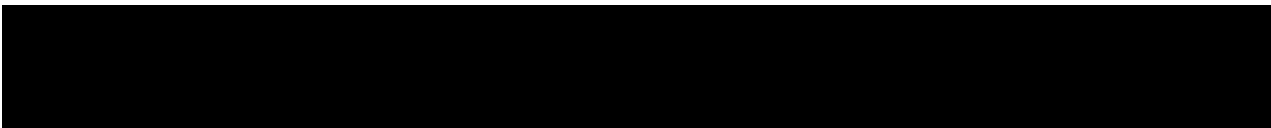
TFS Transfrontier Shipment

WEEE Waste Electrical and Electronic Equipment

WTF Waste Transfer Form

Waste Material(s) generated on site that are no longer usable or unwanted within its current form (that is not to say that the materials cannot be reclaimed or recycled off-site for new uses, energy generation etc).

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The following wastes are typically generated on site:

### Non-Hazardous

- Cardboard and Paper
- Mixed Municipal waste
- Glass
- Metal cans
- Mixed Metals
- Dewatered Sludge from the WWTP
- Leaves and settled material from the firewater pond (infrequent)
- Wooden pallets

### Hazardous

- Spent bulk solvents
- Hazardous solid organic waste
- Empty contaminated packaging
- Lab smalls
- Hydraulic oils
- WEEE
- Wipes, PPE and filters
- Interceptor, inlet sump and WWTP tank residues (infrequent)

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## 5 PROCEDURE

### 5.1 General

In general, Recordati will endeavour to avoid, reduce and minimise waste generation on site. This will be achieved through periodic review of process controls, waste generation data and identification of potential opportunities through changed or improved technologies, awareness training etc.

### 5.2 Storage, Labelling & Packaging

All hazardous waste for consignment will be stored in the tank farm (bulk solvents) or the warehouse.

Liquid hazardous waste generated will be stored in appropriate undamaged containers in bunded areas.

Solid hazardous waste will be stored in the warehouse in closed undamaged containers.

Waste raw material drums will be stored in the front warehouse. Refer to Attachment 1 for details of storage of empty Rec 5 and Rec 8 drums.

Non-hazardous, non-chemical waste will be stored in designated external areas as follows:

Non-Hazardous Oil	Warehouse
Municipal Waste	External Near Main Canteen
Bring banks	External Main Car-park
WEEE	Warehouse
Baled Cardboard	Warehouse
Pallets	Warehouse
Scrap metal	External 30 yard skip
Bulk general waste	External 35 yard skip near tank farm

Waste generated will not be stored for long periods on site as part of license requirements, accident/incident prevention, good housekeeping and minimisation of potentially dangerous substances on site.

Mixtures of different types of waste in one container will be actively avoided as per license requirements.

Wastes will not be mixed to aid recycling/recovery.

In relation to hazardous waste, details of the waste for consignment will be notified to the Agent/carrier including SDS where applicable.

The hazardous waste contractor then forwards the required labelling for affixing.

WFT and TFS forms will be completed prior to shipment of hazardous waste. These are available electronically under Dublin City Council Waste Regulation Management System.

### 5.3 Waste Contractors/Agents

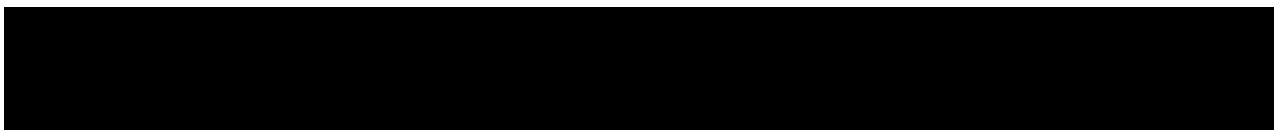
Waste contractors/agents and carriers must be approved prior to engagement. In this regard, contractors will be assessed and approved in accordance with 1590GCC-4 Management of Consultants, Contractors and Service Providers.

The following will be required and held on file electronically:

- Copy of permit and/or licence;
- Details of compliance with the ADR Regulations for carriers of hazardous waste.

### 5.4 Records

Each year a new Waste Register/spreadsheet will be established in excel with tabs for each general type of waste generated. This will contain the following details for each waste consignment to be filled in as applicable:



- Date of transfer off-site;
- WTF Ref (hazardous waste for movement in Ireland only)
- TFS Ref (hazardous waste for shipment abroad)
- List of Waste Code;
- Description;
- Generation Process (how waste arose, if not implicit in description);
- Estimated Quantity (tonnes);
- Carrier;
- Interim destination and waste treatment operation where applicable e.g. storage prior to shipment abroad;
- Final destination – organisation and waste treatment operation.

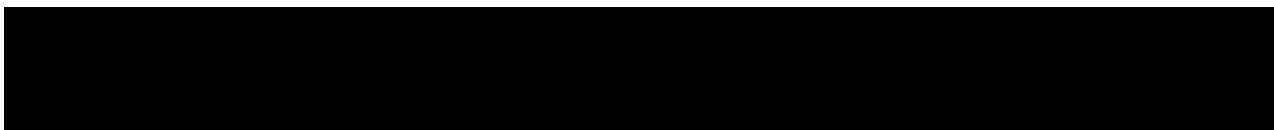
For the purposes of reporting in the EPR, the following will be requested, at least annually, from waste agents/carriers where waste is sent abroad:

- Name of Final Recover/Disposal Organisation
- Final Recover/Disposer Permit
- Final Recover/Disposer Organisation Address
- Final Recover/Disposer Destination Address
- Details of recovery/recycling process in plain English. e.g. R1 code is incineration for heat recovery. However, the agents should request further detail from recovery plants on exact process e.g. some waste is recovered as heat in cement plants.

In this regard, it is expected that the Agent will have a full listing available for use.

Certs of disposal/recovery, TFS and WTFs are to be held on file electronically.

The waste inventory will be used to provide input into the solvent mass balance for reporting under the requirements of the Solvent Regulations.



## 6 ATTACHMENTS

Attachment 1 Waste Calculation Sheet (Calculation Sheet)

## 7 REFERENCES


1585SST - 8 - Safety Statement Section 4.14

1590GCC-4 Management of Consultants, Contractors and Service Providers

Condition 8 of IE P0476-02– Materials Handling

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## 8 REVISIONS

Rev. No	Requested by	Reason & Justification for change
1		Combines and replaces 1580SWC-1 and 1580HWC-2 New legislation and new terminology. Requirement for waste inventory. Updated to account for ISO 14001:2015 and BAT requirements

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