



**OFFICE OF
LICENSING &
GUIDANCE**

INSPECTORS REPORT ON A LICENCE APPLICATION

To: Board

From: Marie O'Connor - LICENSING UNIT

Date: 01 February 2005

RE: Application for a review of waste licence from KMK Metals Recycling Ltd., Cappincur Ind. Estate, Daingean Road, Tullamore, Co. Offaly.
Waste Licence Register No. 113-2

Application Details	
Classes of activity:	Fourth Schedule Classes 3,4,6,7,11,12 and 13 (Principal)
Review application received	22 March 2004
Article 12 compliance:	22 March 2004
Submissions received:	None
Site visit:	26 January 2005

1 Summary

KMK Metals Recycling Ltd has applied for a review of their existing licence (Reg. 113-1 (issued 20 December 2001)) to continue to operate their waste transfer station for non-hazardous and hazardous waste, to double the capacity of the facility to 10,000 tonnes/annum (including storage of hazardous liquids) and to allow waste electrical and electronic equipment (WEEE) to be processed in the materials recovery facility. The site area has been increased by the acquisition of a neighbouring bay with warehousing.

The applicant has not requested any change to the classes of activity currently licensed.

There are currently 12 employees at the facility and this is not expected to increase.

2 Reasons for the Licence Review:

KMK Metals requested a review of their existing licence to take account of the increase in the site area and waste handling capacity following the acquisition of the neighbouring site. They have proposed to develop a WEEE recycling facility in the new warehouse area (Building D) taking hazardous and non-hazardous WEEE for dismantling and onward shipment for recovery/disposal. In addition the company wish to accept hazardous liquid wastes (max storage 20 tonnes) for transfer to a

facility for metal recovery and extend the hours during which waste can be accepted on-site.

3 Facility Infrastructure

The facility is situated in the Cappincur Industrial Estate approximately 2km east of Tullamore on the R402 (Daingean Road) and has been in operation since 1985. The industrial estate also caters for other light industrial units including a steel fabrication facility, a car dismantler, and a metal scrap merchant and agricultural machinery sales yard. There are residential houses along the Daingean Road and agricultural pastureland surrounds the industrial estate.

The total extended facility comprises of concrete covered yards and warehouses (approximately 2,400m²), a forecourt and a facility office. All waste recovery activities are carried out indoors (except for some storage of metal machinery for recovery).

The boundary of the facility is on three sides a 2.8m wall and the other side has a 2m fence with a hedge and trees. The licensed area consists of a warehouse with 3 bays (A, B and C) and the proposal is to utilise the adjacent yard and warehouse (Building D) which is also divided into three sections (D1, D2 and D3). The total area of the combined site is 6,575m³. A new entrance has been constructed to serve the increased site area.

The site is covered with either buildings (warehouse and offices), concrete (forecourt) or paving / loose pebbles (walkway around building and rear of building). Building D (1,480m²) is to be utilised for WEEE storage and processing. Bay B contains a Wet Process Area, which is used for the quarantine of hazardous materials. This area is bunded with a capacity to contain 49m³. The waste liquids (max 20 tonnes) will be stored in this area. The remainder of the warehouse is designed to contain 110 cubic meters of liquids in an emergency situation. Bunded storage tanks for diesel and heating oil are located in the warehouse. A 40,000-litre firewater tank is situated on the forecourt.

4 Process Description

A range of non-hazardous and hazardous wastes are accepted at the facility for recovery. These include the following non-hazardous wastes; non-ferrous scrap, precious metal scrap, electrical and electronic equipment, stainless and high-speed steel scrap, nickel, inorganic minerals and plastics. Hazardous wastes currently accepted include metallic filter cakes, batteries, and electronic and electrical equipment containing hazardous components, inkjet cartridges and zinc oxide filter cake waste.

All consignments of waste are pre-arranged. All waste is inspected, weighed and then stored in an appropriate bay within the warehouses until it is processed further. Processes carried out at the facility include repackaging, dismantling and volume reduction processes such as shredding and baling, sorting and drying. Non-compliant wastes are isolated in a quarantine area. No chemical processing is or is proposed to be carried out. The applicant proposes to accept liquid wastes into the waste transfer station for on-ward shipment.

Building D will be used for the acceptance and processing of WEEE which includes large and small household appliances, IT and telecom equipment, medical devices, monitoring & control equipment, automatic dispensers etc. The processing consists of dismantling, separating and shredding the WEEE and shipment of the segregated

waste streams for off-site recycling, recovery or disposal as required. Some of the WEEE may contain hazardous components such as coolant gases and cathode ray tubes.

All wastes, after on-site processing, are stored in the warehouses pending shipment to facilities both in Ireland and overseas for the recovery of metals and other wastes.

5 Use of Resources

There was no data supplied on the energy or water usage but the RD requires that this is collated and reported as part of the AER.

6 Recommended Determination

6.1 General Requirements

The requirements of the existing licence were incorporated into the RD insofar as possible having regard to the new format of the RD, the physical changes which have occurred at the extended facility site and the additional monitoring data available since 2001.

The RD allows for the extension of processing hours to 2200hrs Monday to Friday as due to the location of the facility within the industrial estate it will not have a significant impact on the nearest sensitive dwelling.

6.2 Air and fugitive emissions:

There are no significant emissions to air from the facility. All processes are carried out within the warehouses. Fugitive dust emissions are possible during the operation of some processes (e.g. shredding, crushing and sieving).

Dust monitoring close to the facility boundary and off site demonstrated that dust deposition is not likely to cause a nuisance. The RD requires the measurement of dust deposition rates in proximity to the facility boundary. The metallic element of the dust must also be determined. In addition, the RD requires that dusty roads are wetted to minimise fugitive dust emissions.

6.3 Emissions to Sewer:

There are no discharges to sewer from this facility.

6.4 Non-Process Water:

Roof rainwater is directed directly to the land drain located along the western boundary of the site. Storm water run-off from the concrete yard will be collected by drainage gullies before being diverted through an oil and silts interceptor and entering the land drain. The proposed changes in the waste intake increases the risk of surface water pollution as liquid wastes will be stored at the site and the dismantling operations may produce oils, coolants or other liquid wastes, however, good housekeeping to prevent and or contain spillages and the use of the bunded area in Bay B for liquid storage will minimise this risk.

The land drain is rainfall dependent and during the summer the applicant has stated that it dries out.

6.5 Firewater Retention

In light of the nature of the wastes being stored, the processing being undertaken and availability of firewater storage within the bunded warehouses it is accepted that a dedicated firewater retention facility is not required.

6.6 Emissions to ground:

Sanitary effluent is treated in a package plant with a percolation area which is adequately sized for the number of employees and the proposed expansion. The RD requires the licensee to test bund integrity at least once every 3 years. The licensee is also required to test the integrity of drains and pipelines at least once every 3 years, and report the results to the Agency in the AER. Analysis of the groundwater indicated no significantly elevated levels in the 'D' area of the site. The RD requires monitoring of the groundwater.

6.7 Noise

The RD sets limits for noise impact at noise sensitive locations and these are not envisaged to be a problem due to (a) the location of the facility within an industrial estate and (b) the carrying out of all process activities within the warehouse.

6.8 Charges:

The annual charges for 2003 and 2004 were €8786 and €9641 respectively. The proposed annual charge for 2005 as specified by the OEE is €6754.

7 Fit & Proper Person Criteria:

The licensee is technically competent, free of relevant convictions and financially capable of operating the RD. In this regard, the licensee satisfies the relevant criteria with regard to the WMA Acts 1996 to 2003.

8 Compliance Record:

In general, KMK Metals have a good record of compliance since grant of their existing licence, however, the site visit indicated that they have expanded into the new site and are accepting and storing waste in the area of Building D.

9 Waste Management Plans, Air Quality Plans :

The Draft Waste Management Plan for Midlands Region (January 2000) does not deal specifically with this facility. While the facility is located in Offaly, the collection of waste is carried out on a national basis. The operation of the facility will not significantly impact on any National or European legislation in relation to air or water quality.

10 Submissions:

No submissions were received on this application for a review of the waste licence.

11 IPPC Directive (96/61/EC)

This installation does not fall within the scope of the IPPC Directive.

12 Recommendation:

I recommend that the Recommended Determination be approved by the Board subject to the conditions and for the reasons as drafted.

Signed

Marie O'Connor