



## KMK Metals Recycling Ltd.

Precious and Non-Ferrous Metals  
Electronic Scrap & Metallic Residues  
Hazardous Metal Waste

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Cappincur Ind. Est.  
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Co. Offaly  
Ireland

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EPA Waste Licence:  
W0113-02

Office of Licensing  
EPA  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford

21<sup>st</sup> November 2006

RE: Waste Licence Register No. WO 113-02  
Licensee: KMK Metals Recycling Ltd., Cappincur Industrial Estate  
Daingean Road, Tullamore, Co. Offaly

Dear Sir / Madam,

In support of our application for a Technical Review of our licence WO 113-02 we wish to outline our position in respect of the requested changes to our licence.

KMK Metals Recycling Ltd. have been preparing for the introduction of the WEEE Directive in Ireland. To this effect we maintain an EPA Waste Licence, have purchased additional area (Area D 1, 2 & 3) and in recent times leased adjacent site D4. Since the introduction of the WEEE Directive we have had various short term commercial contracts with the compliance schemes. The short term nature of these contracts restricted our commercial decision making and development. This situation has now been resolved and we have contractual commitments to manage and recycle a significant portion of the Irish WEEE market.

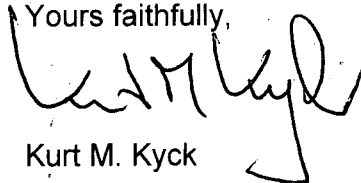
Gradually the tonnage through put on our site will increase beyond the current licensed quantity of 10,000 tonnes. The leased area D 4 and D 5 should now be incorporated into our licence as this space will be required to allow for growth and expansion. The area D4 to be licensed as a processing and storage area for WEEE much the same as D 1, 2 & 3 are now. The area D5 will be required for car parking and vehicle marshalling. The location of a weighbridge is being considered for this site.

We are preparing a planning application to Offaly County Council for the construction of additional covered process and storage areas in the external area between location A B C and D 1 2 3 as well as between D 3 and D4 on our property. Further new office and staff facilities are planned. Negotiations regarding the development of the leased sites are ongoing. We do not wish to waste any further time on our short term primary development plans and are proceeding for the time being as above. As required, copies of our planning application will be forwarded to you soon.

There are no other changes to our licence WO 113-02 required outside of boundary and tonnage. Recent audits of our site by Offaly County Council and the EPA (Mr. David Mathews) will confirm that there is no sign of congestion or lack of storage space capacity. Our routines are very efficient. Our housekeeping has seriously improved. We are only working one shift with some exceptional overtime hours when needed. Investment in handling, sorting, processing, and storage equipment continues.

We request you look favourably on our application.

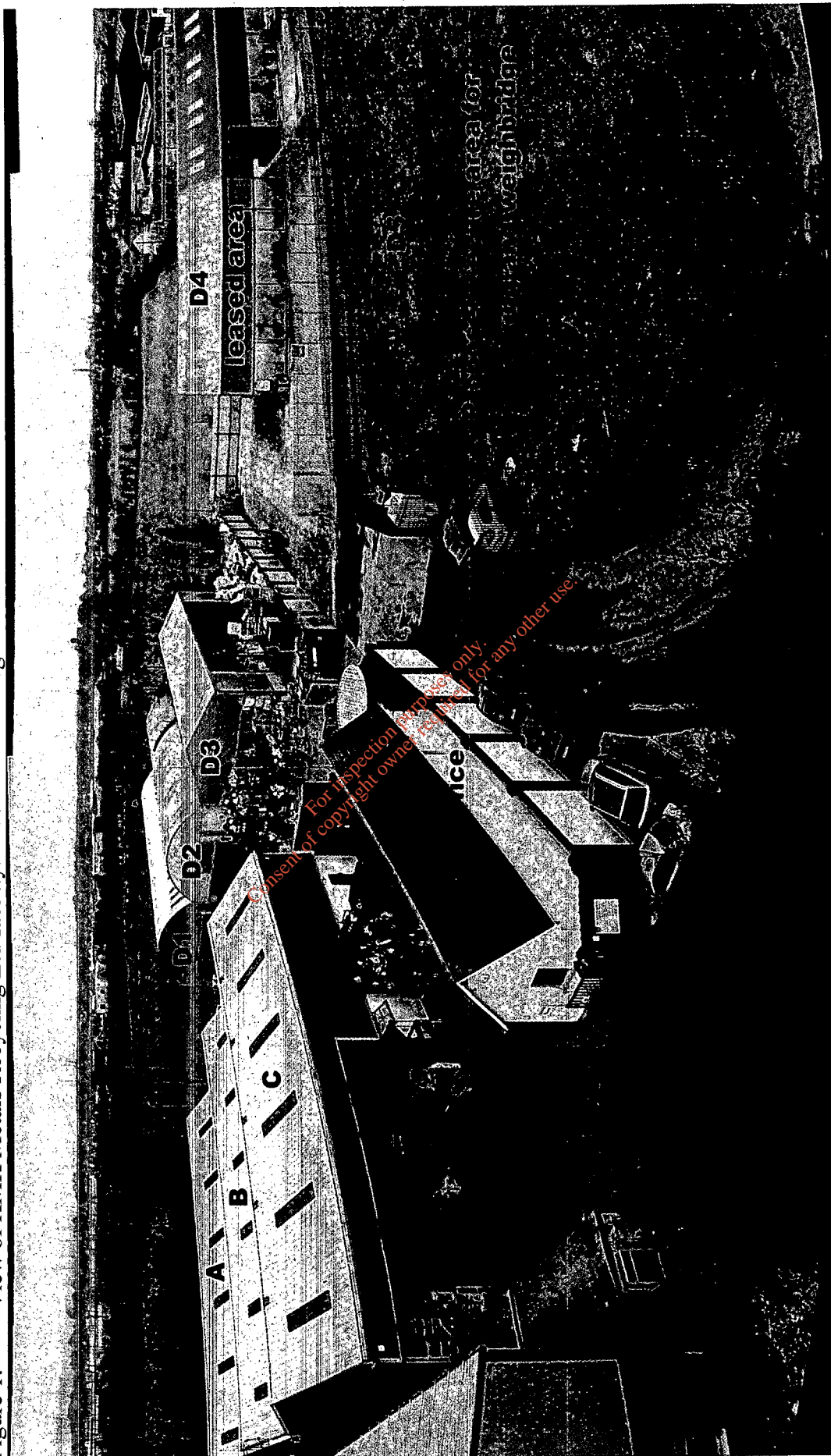
Yours faithfully,



Kurt M. Kyck

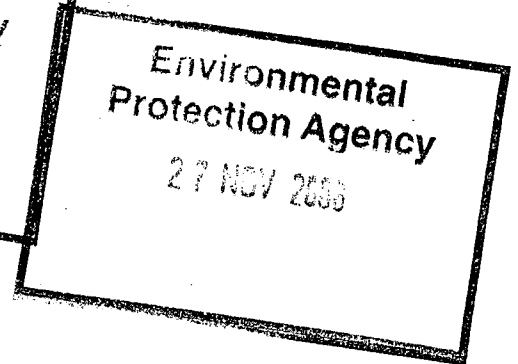
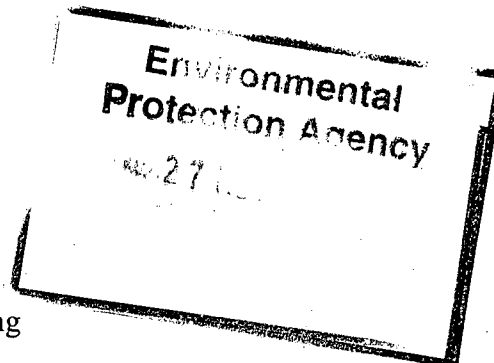
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Figure 1. View of KMK Metals Recycling Ltd facility. Waste License Register No: W0113-02





ENVIRONMENTAL CONSULTANTS



Office of licensing  
EPA  
PO Box 3000  
Johnstown Castle Estate  
County Wexford

23<sup>rd</sup> November 2006

**Re: Waste License Register No: W0113-02**  
**Licensee:** KMK Metals Recycling Ltd  
**Facility:** KMK Metals Recycling Ltd, Cappincur Industrial Estate, Daingean Road, Tullamore, Co Offaly

Dear Sir/Madam

KMK Metals Recycling Ltd wish to apply for the following changes to the above waste licence:

1. Inclusion of an additional existing industrial unit (D4) and additional area (D5) within the confines of the waste licence boundary. The proposed usage of these areas will be:
  - D4 - acceptance and processing of metal waste and WEEE materials.
  - D5 - car parking, vehicle marshalling and weighbridge activity.

Please refer to Figure 1 and Drawing No 06-055-SL01 for an overview of the facility and layout plan of facility respectively.

Furthermore, D4 area has already been agreed with the licensing officer Mr John McEntaggart for temporary storage use while site improvements are on-going at part of the site (EPA referenced letter 113-2/ap02jmce.doc and dated 13-07-06). Environmental noise monitoring carried out at this site has also shown that there is no significant noise emissions from using this additional space.

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2. KMK Metals Ltd wishes to increase the expected tonnage for waste acceptance at the waste licence site from 10,000 up to 20,000 tonnes over the next 1 to 3 years.

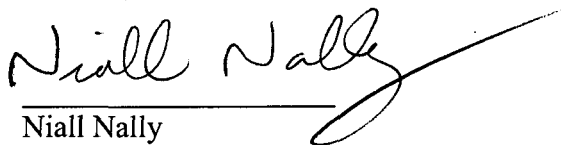
In consideration of this, please note the following details:

- The total waste received at the site for year ending 2005 was approximately 8,400 tonnes. This quantity was received and handled with ease and did not result in any excess storage, stock control problems or pollution incidents. The proposed site improvements (in particular at the 'D' area as shown on the attached Drawing No 06-055-SL01) and extra space provided for in D4 will facilitate the increased waste acceptance and handling.
- House keeping has improved at the site and is being constantly monitored for effectiveness.
- The number of Fork Lift Trucks (FLTs) has increased from 2 to 5 units and this increases waste handling capacity and through put at the site.

In summary, KMK Metals Recycling Ltd feel that this proposed increase in waste acceptance and inclusion of additional space (D4 and D5) within the site boundary will not result in any negative environmental effects off-site and also will not change the nature and type of business being carried out at the facility. This can be confirmed by inclusion of these areas in the monitoring schedule of the waste licence. A full planning application will be made to Offaly County Council by end of December '06 for all proposed site improvements to the existing site as shown on Drawing No 06-055-SL01. For these reasons, KMK Metals Ltd wishes to apply for a technical assessment of the waste license as opposed to a full license review. I attach a letter from Mr Kurt M. Kyck (MD of KMK Metals Ltd) supporting this technical review request.

If you have any questions, please do not hesitate to contact me (tel : 057 93 52200) or KMK Metals Ltd directly.

Yours Sincerely,



Niall Nally  
Senior Environmental Consultant  
cc. Mr Kurt Kyck, KMK Metals Recycling Ltd