

**ATTACHMENT A  
NON TECHNICAL SUMMARY**

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**General Description of the proposed development:**

KMK Metals Recycling Ltd currently operates a hazardous and non hazardous metal waste and electrical and electronic waste transfer facility at Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly (Grid Ref: E235908 N225004). It is the intention of KMK Metals Recycling Ltd to incorporate a neighbouring site (existing commercial warehouse and yard area referred to as D4 and another existing yard area referred to as D5) into the remit of the existing waste license ref: W0113-02. The neighbouring site at D4 is a purpose built industrial site comprising of a concrete covered yard area with surface water drainage infrastructure and a 600m<sup>2</sup> warehouse type building. The proposed additional area at D5 is an unused piece of industrial land (1,720m<sup>2</sup>) which will be surfaced to requirement. A photo below illustrates the existing site including the proposed D4 and D5 areas.



The additional proposed areas will be used as follows:

- In D4 there will be acceptance of Large Household Appliances (LHAs). Mostly these waste materials are accepted and then bulked into large containers for off-site disposal and/or recovery. The building at D4 area will be used for the acceptance and storage of Small Household Appliances (SHAs). Similarly, these waste materials are accepted and then bulked into large containers for off-site disposal and/or recovery. There may be a requirement on occasion for special WEEE dismantling projects inside D4 building e.g. dismantling of items into components prior to off-site removal.
- D5 area will be used for staff and visitor car parking. Planning permission has been granted for the installation of a weighbridge and this will be installed when appropriate to the size and scale of activities at the facility as per condition 8.8.3 of the existing waste licence W0113-02.

KMK Metals Recycling Ltd proposes to increase the capacity of the overall site from 10,000 tonnes to 20,000 tonnes per year, of metals and waste electrical and electronic equipment.

In summary, the revised facility will promote the recovery and recycling of hazardous and non hazardous wastes. It is envisaged that the facility will help to improve the nationwide recycling/recovery infrastructure and reduce the reliance on export of WEEE waste thereby providing a more sustainable solution to waste management.

Site location and layout maps are shown in attachment B2 of application.

**12. (1) Subject to sub-article (2), in the case of an application for a waste licence, the application shall -**

- (a) Give the name, address and, where applicable, any telephone number and telefax number of the applicant (and, if different, the operator of the facility concerned), the address to which correspondence relating to the application should be sent and, if the applicant or operator is a body corporate, the address of its registered office or principal office,**

This application is been made for KMK Metals Recycling Ltd, Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly. This facility will be run, owned and operated by KMK Metals Recycling Ltd. KMK Metals Recycling Ltd is a registered company reference number: 67176 with a company address at same as above. Enviroco Management Ltd. O'Moore Street, Tullamore, Co Offaly has carried out this application in conjunction with the applicant.

- (b) Give the name of the planning authority in whose functional area the relevant activity is or will be carried on,**

The existing waste management site is subject to Offaly County Council's planning authority. Details of new or additional planning permissions to supplement the review application have all been included for inspection in the Appendices.

- (c) In the case of a discharge of any trade effluent or other matter (other than domestic sewage or storm water) to a sewer of a sanitary authority, give the name of the sanitary authority in which the sewer is vested or by which it is controlled,**

There will be no changes from the previous waste licence W0113-02 and therefore no effluent will be discharged to sewer of a sanitary authority or other body.

The proposed surface water discharge impacts from the proposed additional areas D4 and D5 will be as follows:

- Surface water runoff from the concreted site yard at D4 currently flows to an existing open land drain passing along the west boundary of the site. It is proposed to install a Class II interceptor for this surface water run-off.
- Roof rainwater from the D4 building will be discharged directly to the existing land drain separately.
- Surface water run-off from the D5 area will flow into an existing drain which in turn flows to the existing land drain along the west boundary of the site. The existing drain in D5 is a shared drain with other businesses in the industrial estate and serves to remove surface water run-off from a number of commercial businesses.

**(d) Give the location or postal address (including, where appropriate, the name of the townland or townlands) and the National Grid reference of the facility or premises to which the application relates,**

The facility is located in Cappincur Industrial Estate, Dangean Road, Tullamore, Co. Offaly, this can be found on a 25 inch Ordnance Survey Map at grid reference E235908 N225004, see Figures A and A.1 attached.

**(e) Describe the nature of the facility or premises concerned, including the proposed capacity of the facility or premises and, in the case of an application in respect of the landfill of waste, the requirements specified in Annex 1 of the Landfill Directive,**

KMK Metals Recycling Ltd currently operates a hazardous and non hazardous metal waste and electrical and electronic waste transfer facility and is EPA licensed ref W0113-02. This facility is licensed to deal with 10,000 tonnes of waste. Collected waste is sorted into recyclable and non-recyclable goods. Recyclable goods are sent off site for final recycling after they have been correctly sorted. Non-recyclable goods are sent to registered other licensed facilities for further treatment or disposal.

As part of future proposed site operations, KMK Metals Recycling Ltd proposes to accept and process up to 20,000 tonnes per annum of waste and WEEE.

The only waste to be sent to landfill from the facility is canteen waste and minimal amounts of various non hazardous and non recyclable items.

- (f) Specify the class or classes of activity concerned, in accordance with the Third and Fourth Schedules of the Act and, in the case of an application in respect of the landfill of waste, specify the class of landfill in accordance with Article 4 of the Landfill Directive.**

There are no changes planned from the previous waste licence W0113-02 and therefore the types of activity to be carried out at the revised site remain the same:

The principal class of activity to which the licence application relates to is;

*Class 13 of the Fourth Schedule (Waste Recovery Activities) of the Waste Management Act (1996): Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.*

Non Technical Description : temporary storage and processing of waste materials at the facility prior to removal off site for further metals recovery at an alternative facility.

Consequently, other activities carried out on site include;

*Class 3 of the Fourth Schedule (Waste Recovery Activities) of the Waste Management Act (1996): Recycling or reclamation of metals and metal compounds.*

Non Technical Description: Collection, acceptance and processing of metallic wastes (hazardous and non hazardous including electronic and electrical wastes and liquids containing dissolved metals) as part of waste loads arriving at the facility prior to removal off site for recycling or recovery.

*Class 4 of the Fourth Schedule (Waste Recovery Activities) of the Waste Management Act (1996): Recycling or reclamation of other inorganic materials.*

Non Technical Description: Acceptance of plastic components and packaging as part of incoming waste loads.

*Class 6 of the Fourth Schedule (Waste Recovery Activities) of the Waste Management Act (1996): Recovery of components used for pollution abatement.*

Non Technical Description: acceptance of auto catalysts, filters etc.

*Class 7 of the Fourth Schedule (Waste Recovery Activities) of the Waste Management Act (1996): Recovery of components from catalysts.*

Non Technical Description: Recovery of metals from catalysts in manufacturing processes (this applied to liquids and solids)

*Class 11 of the Fourth Schedule (Waste Recovery Activities) of the Waste Management Act (1996): Use of waste obtained from any activity referred to in a preceding paragraph of this schedule.*

Non Technical Description: re-use of some waste materials e.g. metal drums, IBCs, cardboard boxes and textile IBC bulk bags for waste receptacles.

*Class 12 of the Fourth Schedule (Waste Recovery Activities) of the Waste Management Act (1996): Exchange of waste for submission to any activity referred to in a preceding paragraph of this schedule.*

Non Technical Description: Trading activities in waste management.

- (g) Specify, by reference to the relevant European Waste Catalogue codes as presented by Commission Decision 2000/532/EC of 3 May 2000, the quantity and nature of the waste or wastes which will be treated, recovered or disposed of,**

There are no changes planned to the nature and types of waste to be accepted and handled at the facility from the existing waste licence ref: W0113-02 with the exception of the inclusion of a 4 additional EWC codes as referred to in the main application.

However, it is intended to increase the quantities from the existing 10,000 tonnes to 20,000 maximum for waste acceptance per year. The capacity of the additional proposed areas (D4 and D5) will be more than adequate for this proposed increase in tonnage.

- (h) Specify the raw and ancillary materials, substances, preparations, fuels and energy which will be utilised in or produced by the activity,**

There will be no changes or additions to the types of raw materials, energy and fuels used at the revised site.

- (i) Describe the plant, methods, processes, ancillary processes, abatement, recovery and treatment systems and operating procedures for the activity,**

There will be no changes from the existing waste licence W0113-02 regarding the type of operations at the facility i.e. acceptance and handling of non hazardous and hazardous metallic and WEEE waste items for recovery purposes.

The proposed changes to hours of waste acceptance and operation of the facility will be 06:00 to 22:00 Monday to Friday inclusive and 06:00 to 13:00 on Saturdays. Therefore the facility proposes a 2 hour earlier start from the existing waste licence W0113-02. The proposed hours as detailed above will provide for adequate flexibility of activities in the event of any



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contingency plans at the site where additional time is required for specific waste handling projects.

Future operations proposed for D4 and D5 will be;

- In D4 there will be acceptance of Large Household Appliances (LHAs). Mostly these waste materials are accepted and then bulked into large containers for off-site disposal and/or recovery. The building at D4 area will be used for the acceptance and storage of Small Household Appliances (SHAs). Similarly, these waste materials are accepted and then bulked into large containers for off-site disposal and/or recovery. There may be a requirement on occasion for special WEEE dismantling projects inside D4 building e.g. dismantling of items into components prior to off-site removal.
- In D5 this area will be used for staff and visitor car parking. There is also an option to use a weighbridge here should future operations require one.

**(j) Provide information for the purpose of enabling the Agency to make a determination in relation to the matters specified in paragraphs (a) to (i) of section 40(4) of the Act,**

- (a) Environmental emissions (noise, dust, surface water, groundwater) from the operation of this facility by KMK Metals Recycling Ltd are monitored as part of the existing waste license W0113-02. These emissions do not result in the contravention of any relevant standard. The incorporation of D4 and D5 areas within the waste license boundary will not result in significant or otherwise adverse emissions to environment.
- (b) Environmental pollution will not occur for the following reasons:
- The vast majority of all waste acceptance and handling will occur indoors or under roof where appropriate.
  - All on-site domestic effluent is treated by a proprietary treatment system before discharge to percolation.
  - All surface water run-off from outside yard areas is treated by interceptors before entering a land drain.
  - The Environmental Management System (EMS) for the site is effective at controlling all potential emissions from the working facility.
- (c) The Best Available Technology Not Entailing Excessive Cost (BATNEEC) will be used to prevent, eliminate and control emissions from the activity concerned. The activity is consistent with the objectives of the relevant waste management plan.
- (d) KMK Metals Recycling Ltd are fit and proper to hold a waste licence as defined by the EPA and an existing waste license is in place at the site ref: W0113-02.
- (e) In the event of decommissioning the facility, KMK Metals Recycling Ltd will follow the procedures as defined under the granted licence. A financial bond will be entered to ensure funds will be available to carry out such works as are needed.
- (f) Energy consumption is estimated at 80% for waste handling and 20% for office operations and administration. Vehicles and machinery will be regularly maintained to prevent wear and tear that can lead to increased energy consumption.

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- (g) Noise emissions from the site are not deemed to have a nuisance effect on the surrounding environment. The future developments of this facility are not deemed to pose any notable increase in noise emissions at Noise Sensitive Locations.
- (h) There are a number of structures on site to prevent accidents occurring which will have an effect on the environment. In the event of an accident, procedures have been put in place to limit the consequences to the environment. Details of these procedures are contained in Attachment J. Details of each contingency are dealt with in more detail in Attachment J. Measures to decommission the site in the event of the cessation of all or part of the activity are described in Attachment K.
- (k) Give particulars of the source, location, nature, composition, quantity, level and rate of emissions arising from the activity and, where relevant, the period or periods during which such emissions are made or are to be made,**

There are no changes planned here from the existing waste licence W0113-02 with the exception of inclusion of additional monitoring locations for on-going dust, noise and emissions to surface water.

Water and wastewater stream flows are outlined in section 12.61.c

- (l) give details, and an assessment of the effects, of any existing or proposed emissions on the environment, including any environmental medium other than that into which the emissions are, or are to be, made, and of proposed measures to prevent or eliminate or, where that is not practicable, to limit or abate such emissions,**

Dust, noise, surface water and groundwater monitoring is carried out at the site as part of the existing waste license.

Potential dust and noise emissions from the inclusion of D4 and D5 areas are not expected to cause nuisance conditions on-site or at the site boundaries. Control measures will further ensure this. These are the acceptance, processing and temporary storage of all wastes inside under covered areas and/or in buildings. Good house keeping measures will also ensure that dust generation is kept to a minimum.

There will be no effluent discharge to surface water from the site. All storm water run-off will be diverted through interceptors prior to discharge to the existing land drain west of the site. This discharge is not expected to cause pollution of the land drain. There will be no changes to the surface water drainage system at the existing waste license site.

There will be no discharges to sewer from the site. All domestic sewage is treated on-site with a waste water treatment system (e.g. Biocycle type unit) with final treated effluent being discharged to soak-away.



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No other emissions are expected from the facility.

- (m) Identify monitoring and sampling points and indicate proposed arrangements for the monitoring of emissions and the environmental consequences of any such emissions,**

Sampling/monitoring points will remain at the site as is the present case. There will be additional locations added to the site at D4 and D5 areas.

- (n) Describe any proposed arrangements for the prevention, minimisation and recovery of waste arising from the activity concerned,**

There are no changes planned here and all items remain unchanged from the existing waste license W0113-02.

- (o) Describe any proposed arrangements for the off-site treatment or disposal of solid or liquid wastes,**

There are no changes planned here and all items remain unchanged from the existing waste license W0113-02.

- (p) Describe the existing or proposed measures, including emergency procedures, to prevent unauthorised or unexpected emissions and minimise the impact on the environment of any such emissions.**

Explosions, fire and spillages are the only emergency situations that could give rise to the release of unauthorised or unexpected emissions from the site.

These emergency situations will be handled as outlined in the company Emergency Response Procedure (ERP) as part of ISO 14001. Therefore the ERP in force at the existing site (W0113-02) will be modified to take into the proposed inclusion of D4 and D5 areas to the site.

- (q) Describe the proposed measures for the closure, restoration, remediation or aftercare of the facility concerned, after the cessation of the activity in question,**

This site will not require remediation. The concrete yard and flooring system will inhibit the entrance of contaminants into the underlying soil and groundwater. Interceptor units and drainage gullies will collect pollutants before they can reach land drains in the area.

At present it is the intention of the KMK Metals Recycling Ltd to operate this facility for the foreseeable future. Should part of the activity cease to operate a review of the licence with the EPA to reflect the change will be arranged. Decommissioned equipment will be removed or removed from the site to an appropriate disposal or recovery facility.

Should all activities cease to be at the facility, KMK Metals Recycling Ltd will enter into a review of the waste licence with the EPA in order to surrender the waste licence. The following actions will be carried out to ensure the site is free of contamination and of continuing emissions:

- all waste at the facility will be sent off-site for appropriate recycling/disposal at alternative licensed facilities.
- all Waste Handling and storage equipment and vehicles will be removed from the site either by selling them and / or dismantling them and recovering them by an approved metal recycler.
- all fuel tanks and bunds will be decommissioned.
- The interceptors will be examined and cleaned out by approved contractors.
- The gates to the facility will be locked and security measures implemented to prevent scavenging on site after it is decommissioned.

This decommissioning process will make the site a safe, usable Brownfield site appropriate for any commercial activity within the confines of the existing commercial business park.

Any decommissioning procedures will be agreed with the EPA in advance should all or part of the activity cease to operate.

To financially underwrite the decommissioning of the activities on the site KMK Metals Recycling Ltd has a closure bond with Offaly County Council for €63,500 for these eventualities. This bond will be re-assessed in the near future as part of an environmental liabilities risk assessment (ELRA) methodology and subsequently will be arranged with the EPA as the appointed site regulator.

**(r) In the case of an application in respect of the landfilling of waste, give particulars of -**

No waste disposal will be occurring on site.

**(i) Such financial provision as is proposed to be made by the applicant, having regard to the provisions of Articles (7)(i) and (8)(a)(iv) of the Landfill Directive and section 53(1) of the Act, and**

No disposal of waste is to occur on site.

**(ii) Such charges as are proposed or made, having regard to the requirements of section 53A of the Act,**

No disposal of waste is to occur on site.

- (s) State whether the activity is for the purposes of an establishment to which the European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2000 (S.I. No. 476 of 2000) apply,**

No dangerous substances defined as highly flammable or explosive liquids are to be collected, treated or stored on site. Only hazardous metallic and/or WEEE wastes may be found during normal operations as part of waste loads being accepted.

The European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2000 do not apply to this facility.

- (t) In the case of an activity which gives rise or could give rise to an emission into an aquifer containing the List I and II substances specified in the Annex to Council Directive 80/68/EEC of 17 December 1979, describe the existing or proposed arrangements necessary to give effect to Articles 3, 4, 5, 6, 7, 8, 9 and 10 of the aforementioned Council Directive,**

No list I or list II substances are to be accepted or treated on site.

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