



**OFFICE OF CLIMATE,  
LICENSING &  
RESOURCE USE**

**INSPECTORS REPORT ON A LICENCE APPLICATION**

<b>To:</b>	Directors	
<b>From:</b>	Marian Doyle	<b>- ENVIRONMENTAL LICENSING PROGRAMME</b>
<b>Date:</b>	9 <sup>th</sup> January 2008	
<b>RE:</b>	Application for a Waste Licence Review from <b>KMK Metals Recycling Ltd</b> , Cappincur Ind. Estate, Daingean Road, Tullamore, Co. Offaly. Licence Register <b>W0113-03</b> .	

Application Details	
Type of facility:	Hazardous Waste Transfer Station
Class(es) of Activity ( <b>P</b> = principal activity):	Fourth Schedule: Classes 3, 4, 6,7,11,12,13 (P).
Quantity of waste managed per annum:	10,000tpa in W0113-02 20,000tpa in W0113-03
Classes of Waste:	Waste Electrical and Electronic Equipment (WEEE)
Location of facility:	Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly.
Licence application received:	21 <sup>st</sup> May 2007
Third Party submissions:	None
EIS Required:	No
Article 14 Notices sent:	16 <sup>th</sup> August 2007
Article 14 compliance date:	19 <sup>th</sup> September 2007
Site Inspection:	11 <sup>th</sup> July 2007

**1. Facility**

KMK Metals Recycling Ltd has applied for a review of their existing licence (Reg. W0113-02, issued 01 February 2005) to continue to operate a waste transfer station for hazardous and non-hazardous waste. It is proposed to increase the waste intake from 10,000tpa to 20,000tpa of metallic waste and Waste Electrical and Electronic Equipment (WEEE). Licence W0113-01 was issued in 2001 and the facility has been in operation since 1985, under permit from Offaly Co. Co.

The facility is situated in the Cappincur Industrial Estate on the R402 (Daingean Road), approximately 2km east of Tullamore. The industrial estate also caters for other light industrial units including hauliers, steel fabrication, and car dismantling. KMK Metals is located at the rear of the estate. There are residential houses along the Daingean Road to the north and north-east of the facility and agricultural land surrounds the estate. The hours of waste acceptance and operation in W0113-02 are 08:00 to 22:00 Monday to Friday and 08:00 to 13:00 on Saturday. An earlier time of 0:600hrs for waste acceptance and operation has been requested. There are 12 employees at the facility and an additional 12 sub-contractors.

The licensable activities carried out at the facility are Fourth Schedule: Classes 13 [Principal Activity] 3, 4, 6,7,11, and 12. No changes to the activity classes are proposed in the review application. There are no changes proposed to the types of waste with the exception of 4 additional EWC codes:

- Waste printing toner containing dangerous substances (08 03 17\*);
- Waste printing toner other than those mentioned in 08 03 17\* (08 03 18);
- Gases in pressure containers (including halons) containing dangerous substances (e.g. old fire extinguishers) (16 05 04\*);
- Gases in pressure containers other than those mentioned in 16 05 04\* (16 05 05).

The asterisk (\*) denotes hazardous waste.

## **2. Reasons for the Licence Review**

KMK Metals has requested a review of licence W0113-02 and propose to:

- increase the waste intake from 10,000tpa to 20,000tpa;
- extend the site boundary to incorporate an adjoining site comprising a warehouse building and associated concrete yard (D4) and separate area of land (D5) for parking, and to extend the hours of operation to an earlier start of 06.00hrs.

## **3. Operational Description**

The licensee operates a waste transfer station accepting hazardous and non-hazardous metal wastes and WEEE. The licensable activities include temporary storage and processing of waste materials prior to removal offsite for further metals recovery, collection, acceptance and processing of metallic wastes including WEEE and liquids containing dissolved metals, acceptance of plastic components and packaging, acceptance of auto catalysts, filters etc., recovery of metals from catalysts in manufacturing processes, and reuse of some waste materials, e.g. metal drums.

The existing facility comprises of warehouse buildings, concrete yard areas and a facility office. The area under W0113-02 is 6,575m<sup>2</sup>, which consists of:

- A warehouse building with 3 bays (A, B & C) for recovery/processing and storage of metallic waste; Bay B contains a bunded area for hazardous materials.
- A warehouse (Building D) in 3 sections (D1, D2 & D3), for WEEE storage & processing.

The infrastructure & processes proposed in the review application are:

- A warehouse building D4 (600m<sup>2</sup>) proposed for acceptance, sorting and temporary storage of household batteries prior to off site recovery/treatment. The application states that there will be no lead acid batteries accepted at this

location. The building, which has a roller shutter door, is also to be used for storage and management of high value WEEE e.g. computer tower/desktop units.

- The yard area at D4 is to be used for vehicle marshalling and skip storage. Fridges are also bulked into shipping containers in this area for recovery/disposal off site.
- Area D5 (1,720m<sup>2</sup>) is proposed for staff & visitor parking (40 spaces). No waste storage or handling is proposed for this area, however the licensee has stated that a movable weighbridge may be installed in D5 when required.
- Installation of a roof is proposed over the two yard areas adjacent to the existing WEEE building. These open fronted covered areas are proposed for handling and storage of WEEE, and this will increase waste storage and handling capacities. Large household appliances (LHA's) will be compacted in this area for recovery/ disposal off site. Planning permission has been granted (07/78), total covered area is 1,379m<sup>2</sup>.
- A portacabin office and canteen are proposed adjacent to the existing office.

On 13/07/06 the Agency (OEE) approved a proposal to extend the site boundary for a six-month period while site works were taking place under Condition 1.4 of the existing licence.

In 2006 8,716 tonnes of non-hazardous waste and 4,839 tonnes of hazardous waste were accepted from civic amenity sites, commercial, and industrial sources. The RD allows for acceptance of 20,000tpa and the additional EWC codes have been added in Schedule A of the Recommended Decision (RD). The RD also allows for the extension of hours of waste acceptance/operation to commence at 0600hrs. Due to the location of the facility and the distance to sensitive receptors it is considered this will not have a significant impact.

In the RD Condition 3.9 requires that WEEE shall be stored in designated areas within the waste transfer buildings prior to being sent off site for disposal/recovery at an appropriate facility. Drainage/spillages from these areas shall be directed for collection and safe disposal.

Condition 8.10 requires that all waste processing shall be carried out inside the waste transfer facility buildings. The licensee currently uses a weighbridge at another licenced waste facility in the same Industrial Estate. Condition 3.8 requires a weighbridge (as described in the application) to be provided at the facility in addition to the industrial weigh scales. The licensee has received planning permission for a weighbridge and it also has been a recommendation of OEE. The weighbridge shall be self contained, bunded and drainage shall be collected for safe disposal.

#### **4. Use of Resources**

In 2006 the resources consumed at the facility were reported as:

- electricity for lighting and heating (59,407kWh);
- kerosene (31,720kWh <sup>Note 1</sup>) for heating; and
- diesel (163,585kWh <sup>Note 1</sup>) for forklifts and company waste collection vehicles.

Note 1: refers to where energy conversion factors are used.

The size of the boiler, which is fuelled by kerosene, is 26kW. Energy consumption is estimated at 80% for waste handling and 20% for office use. The RD retains the

conditions for energy efficiency and resource use. An abstraction well onsite provides the water supply to the facility.

## **5. Emissions**

### **5.1 Air**

There are no direct emissions to air. There is the potential for fugitive dust emission from some processing activities (e.g. shredding, crushing and sieving), however all processing is carried out within the warehouse buildings. In Condition 6.8 the licensee shall prepare a programme, for the identification and reduction of fugitive emissions. Dust monitoring reports for W0113-02 (2006 AER) concluded that dust emissions are not causing a nuisance offsite. The proposed changes to the facility are not expected to have a significant effect on dust emissions. The licensee proposes control measures including yard cleaning and sweeping as needed and good housekeeping. The dust limit has been set in the RD at 350mg/m<sup>2</sup>/day being the standard industrial dust depositional limit and which is given in the BAT Guidance Notes for the Waste Sector: Waste Transfer Activities (Draft). The RD retains the requirements for dust control measures (Condition 6.12). Additional dust monitoring locations proposed by the licensee have been included in the RD and further dust measures are to be implemented as required in the EMP.

### **5.2 Emissions to Sewer**

There are no emissions to sewer. There is an on-site treatment plant (biocycle type unit) for sanitary effluent, before discharge to an existing percolation area. Offaly Co. Co. have proposals for a sewer network to serve the industrial estate within 2 years, with an option for KMK Metals to connect in the future.

### **5.3 Emissions to Surface water**

There are no existing or proposed process emissions to surface water.

### **5.4 Storm Water Runoff**

A drainage plan was submitted (ref. 06-055-PP01). In W0113-02 there are two storm discharges from the facility to a land drain at the rear of the site. Drainage from building roofs A,B,C, (metallic waste building) yard area and site offices is via a Class II interceptor to the drain at outlet CX. Drainage from the yard adjacent to building D1,D3,D3, (existing WEEE building) is via a Class II interceptor to the land drain at DX.

During an OEE Audit on 08/03/07 an oily sheen was observed in the land drain adjacent to the two surface water discharge pipes. It was noted that as the facility is located in an Industrial Estate this oily sheen may have been contributed to by other industries. The monitoring requirements for storm emissions are detailed below.

The inclusion of impervious areas at D4 and D5 will generate additional storm runoff from the facility. The licensee proposes that all waste recovery activities will be carried out indoors. The licensee has proposed good housekeeping to prevent and/or contain spillages. Also the roof covering will decrease the volume of runoff from open yard areas and the potential for contamination. At yard area D4 the existing drainage is via a gully system to the land drain. KMK propose to direct this drainage to the Class II interceptor serving the WEEE area (to DX) as part of future site operations. Condition 3.17 requires Class II full retention separators for all areas, with the exception of area D5. This is required to be complete within four months of

grant of licence. Monitoring of storm water emissions at CX and DX are required in Schedule C and parameters include mineral oils and metals.

Area D5 is proposed for staff and visitor parking and a movable weighbridge. Storm drainage from this area is to an existing drainage system, which serves other businesses in the industrial estate. This discharges to the land drain at the northern corner of the facility. Condition 3.8 requires the weighbridge to be self-contained and not drain to the surface water drainage system.

Measures are proposed in the application for containment of firewater for the incorporated area D4. In W0113-02 it was determined that a dedicated firewater retention facility was not required. This was in light of the nature of the wastes being stored, the processing being undertaken and availability of firewater storage within the bunded warehouses. The requirements for firewater retention shall be reviewed as required by the Agency as per Condition 3.20. The integrity of bunds, drains and pipelines must be tested at least once every 3 years

#### 5.5 Emissions to Ground/Groundwater:

There are no process emissions to ground or groundwater, and the RD prohibits any such discharges. A package plant for sanitary effluent discharges to percolation. The site including the areas D4 and D5 have an impervious surface. Groundwater monitoring is as required in licence W0113-02 for Boreholes GW1 and GW2. GW1 is the water supply to the facility.

#### 5.6 Wastes Generated:

All waste arising from the operation of the facility will be recovered where possible. All other wastes will be disposed of off-site.

#### 5.7 Noise:

The facility is located within an industrial estate, in a surrounding rural area. In the 2006 noise survey (AER) the main sources of noise generated at the facility were attributed to the operation of forklifts and general waste transfer operations. It concluded that due to the industrial nature of the area and the significant distance to the nearest sensitive receptor, the likelihood of activities at the facility having negative impacts on the nearest residential dwelling were minimal.

The RD sets limits for the boundary locations and requires annual noise monitoring. Also night-time monitoring has been added. In Condition 6.11 noise attenuation measures shall be implemented as required to ensure compliance with noise limits.

#### 5.8 Nuisance:

The facility only accepts inorganic waste. The changes proposed are not expected to have an impact on potential nuisances and all waste processing is carried out indoors. Condition 6.14 requires inspections to be carried out for nuisance caused by dust.

## **6. Cultural Heritage, Habitats & Protected Species**

There are no habitats identified on or adjacent to the facility, which is in an industrial area. There are no significant environmental emissions from the facility, which could give rise to adverse effects on designated sites.

## **7. Waste Management, Air Quality and Water Quality Management Plans**

The Waste Management Plan for Midlands Region (2005-2010) does not deal specifically with this facility. Also 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.

## **8. Environmental Impact Statement**

An Environmental Impact Statement was not required by the Planning Authority.

## **9. Best Available Techniques (BAT)**

I have examined and assessed the application documentation and I am satisfied that the site, technologies and techniques specified in the application and as confirmed, modified or specified in the attached Recommended Decision comply with the requirements and principles of BAT. I consider the technologies and techniques as described in the application, in this report, and in the RD, to be the most effective in achieving a high general level of protection of the environment having regard - as may be relevant - to the way the facility is located, designed, built, managed, maintained, operated and decommissioned.

## **10. Compliance with Directives/Regulations**

The facility does not fall under the scope of either the Landfill Directive or the IPPC Directive. In relation to the Water Framework Directive & the Groundwater Directive, the facility has no direct process emissions to surface or groundwater.

The European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations (S.I. 74 of 2006) do not apply to the facility.

## **11. Compliance Record**

The comments of the OEE inspector have been sought. The licensee is generally compliant. During an Audit on 08/03/07, it was noted that the licensee had accepted just over 13,555 tonnes of waste in 2006 compared to the licence limit of 10,000tpa. Some minor non-compliances have been recorded in relation to records and exceedances of ELVs for surface water and dust. No complaints have been received relating to the facility since issue of their first licence in 2001.

## **12. Fit & Proper Person Assessment**

The legal, technical and financial standing of the applicant qualifies them to be considered Fit and Proper Persons.

## **13. Proposed Decision**

I am satisfied that the conditions set out in the RD will adequately address all emissions from the facility and will ensure that the carrying on of the activities in accordance with the conditions will not cause environmental pollution.

#### **14. Submissions**

No submissions have been made in relation to this application for the review of a waste licence.

#### **15. Charges**

The annual charge for 2008 as set by OEE is **€7,958**. The charge has been retained, as it is not anticipated that there will be additional enforcement.

#### **16. Recommendation**

I have considered all the documentation submitted in relation to this application and recommend that the Agency grant a licence subject to the conditions set out in the attached RD and for the reasons as drafted.

Signed

---

Marian Doyle

Inspector

#### **Procedural Note**

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2005.