



ENVIRONMENTAL CONSULTANTS

W113-03
D.B.

Environmental Protection
Agency
06 NOV 2008

Ms Eimear O'Keeffe
Inspector
Office of Environmental Enforcement
EPA Headquarters
PO Box 3000
Johnstown Castle Estate
County Wexford

4th November 2008

Re: Waste License Register No: W0113-03
Licensee: KMK Metals Recycling Ltd
Facility: KMK Metals Recycling Ltd, Cappincur Industrial Estate, Daingean Road, Tullamore, Co Offaly

Dear Ms O'Keeffe

KMK Metals Recycling Ltd wishes to apply for a technical amendment to their existing waste licence. The details of this are as follows:

1. KMK Metals Ltd wishes to increase the permitted annual tonnage for waste acceptance at the waste licence site from 20,000 tonnes to 25,000 tonnes.

In support of this, please review the following information:

- Due to the nature of WEEE contract/tenders at present within Ireland, it is possible to lose and win tenders for waste management quite regularly. It is imperative that KMK Metals Recycling Ltd maintains its commercial competitiveness to be able to take-on new WEEE contracts without being limited to 20,000 tonnes of waste annually. Therefore, KMK Metals requests to be prepared to accept up to 25,000 tonnes annually. This prudent measure is a business contingency option. In reality it may be the case that the annual waste acceptance will not exceed 20,000 tonnes for



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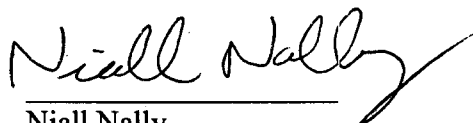
the foreseeable future however, forward planning by KMK Metals requires that all eventualities are considered for the site.

- In light of the recent 'Duty and Stand-by Capacity Report' as submitted to the Agency, this report concluded that there is adequate storage facilities at the site for additional tonnages of WEEE in a safe and secure manner. There are now two separate TFS documents in place which allows for 50 movements at any one time for WEEE (this compares to one TFS in place at the start of the new licence W0113-03). The addition of another TFS outlet will result in an increase in material turnover at the facility thereby avoiding lengthy storage of WEEE on-site.
- Since the granting of the new licence W0113-03, there have been much improvements to the infrastructure to the site i.e. metal baler for WEEE, new building over yard at D area, additional fork lift trucks. These improvements will result in an increased capability of KMK Metals Recycling Ltd to handle WEEE more efficiently and therefore allow for additional WEEE acceptance for the site.
- The new ring road for Tullamore is being developed at present according to schedule. When complete, this road will effectively service the KMK Metals Recycling Ltd facility with improved roads infrastructure and reduced time in transferring waste to and from the site.
- The proposed additional waste tonnage is to be the same wastes in type and description to that currently acceptable in the waste licence.

In summary, KMK Metals Recycling Ltd feel that this proposed increase in waste acceptance 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. A full planning application will be made to Offaly County Council by end of December '08 for additional roof coverage at D4 area. For these reasons, KMK Metals Ltd wishes to apply for a technical amendment of the waste license as opposed to a full license review.

I 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