



**ENVIRONMENTAL CONSULTANTS**  
LoCall 1890 522 000

Mr Brian Meaney  
Inspector  
Environmental Protection Agency (EPA)  
PO Box 3000  
Johnstown Castle Estate  
Co Wexford

11<sup>th</sup> August 2011

**RE: KMK Metals Recycling Ltd (W0113-03)**

**Unsolicited further information (WEEE plant details and New emission point) to supplement waste licence review application ref: W0113-04 as received by your office on 20<sup>th</sup> October 2009.**

Dear Mr Meaney,

Further to my letter dated 23<sup>rd</sup> September 2011, and submitted to your office, whereby I formally stated the clear intention of KMK Metals to install a new state-of-the-art WEEE processing plant my client KMK Metals Recycling Ltd wishes to provide the following further information prior to a proposed determination of the licence review ref; W0113-04.

**(1) WEEE plant process description.**

The new process plant will comply with BAT (best available technology) and will involve a combination of manual sorting and mechanical treatment of small household appliances (SHA), IT and Telecommunications equipment and other suitable small electrical and electronic equipment. The process is both effective and appropriate to the volume of material available in Ireland.

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The process schematic layout, descriptions and the plant specification details are all provided separately in a document labelled **strictly confidential information** and dated 11<sup>th</sup> August 2011.

**(2) Point source emissions information;**

There will be one point source emission from the proposed WEEE plant in terms of noise and dusts. The proposed point source emission is not considered significant due to robust noise and dust treatment proposals which are further explained in the document labelled **strictly confidential information** and dated 11<sup>th</sup> August 2011.

In summary, the new emission point (ref; NE3 and A2-8) are illustrated on the attached map ref: F.1.2.

Therefore location ref: NE3 on map F.1.2 replaces the previous reference of this point on the Map F.1.1 Environmental monitoring locations as submitted in the original waste licence review application.

Hence the revised Map F.1.1a Environmental Monitoring Locations is also attached for inclusion with the review application.

**(3) Summary**

As previously stated in my letter dated 23<sup>rd</sup> September 2010, the waste streams and physical activities will not change in nature from the existing licence or indeed the licence review application.

The proposed plant will provide added value in the recovery of WEEE (principally direct metals recovery e.g. copper, aluminium, steel and other non ferrous mixtures). Therefore the output from this new process will be metals and other materials that can be sent directly to the final recoverer or disposer in European destinations without the need for any intermediate treatment facility. It may be also considered that in some cases, the actual metallic outputs from the process (i.e. copper, aluminium and steel) are to be classed as materials and not actual wastes. This is considered when the final recovery facility is using the materials in their manufacturing process.

This proposed WEEE plant is fundamental to KMK Metals Recycling Ltd, in terms of providing a competitive and sustainable waste management service to both of the established national WEEE compliance schemes and commercial customers via b2b opportunities and also to provide an increased efficiency of recovery of WEEE materials.

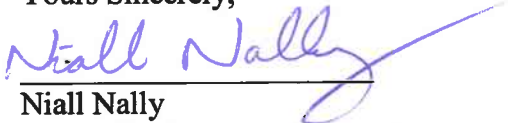
There has been much research conducted by both KMK Metals and other appointed professionals (design engineers, waste management consultants, electrical and software systems providers) in the decision process of this new machinery and plant. Extensive site visits have taken place by KMK Metals management to existing sites across Europe where these systems are currently operational at similar facilities.

Therefore after considering this system and other alternatives, it was decided to proceed this specific process.

It is expected to commission the new WEEE plant for end of August 2011 with subsequent start up and process validation occurring through September 2011.

If you have any questions, please do not hesitate to contact me.

Yours Sincerely,



Niall Nally

Senior Environmental Consultant

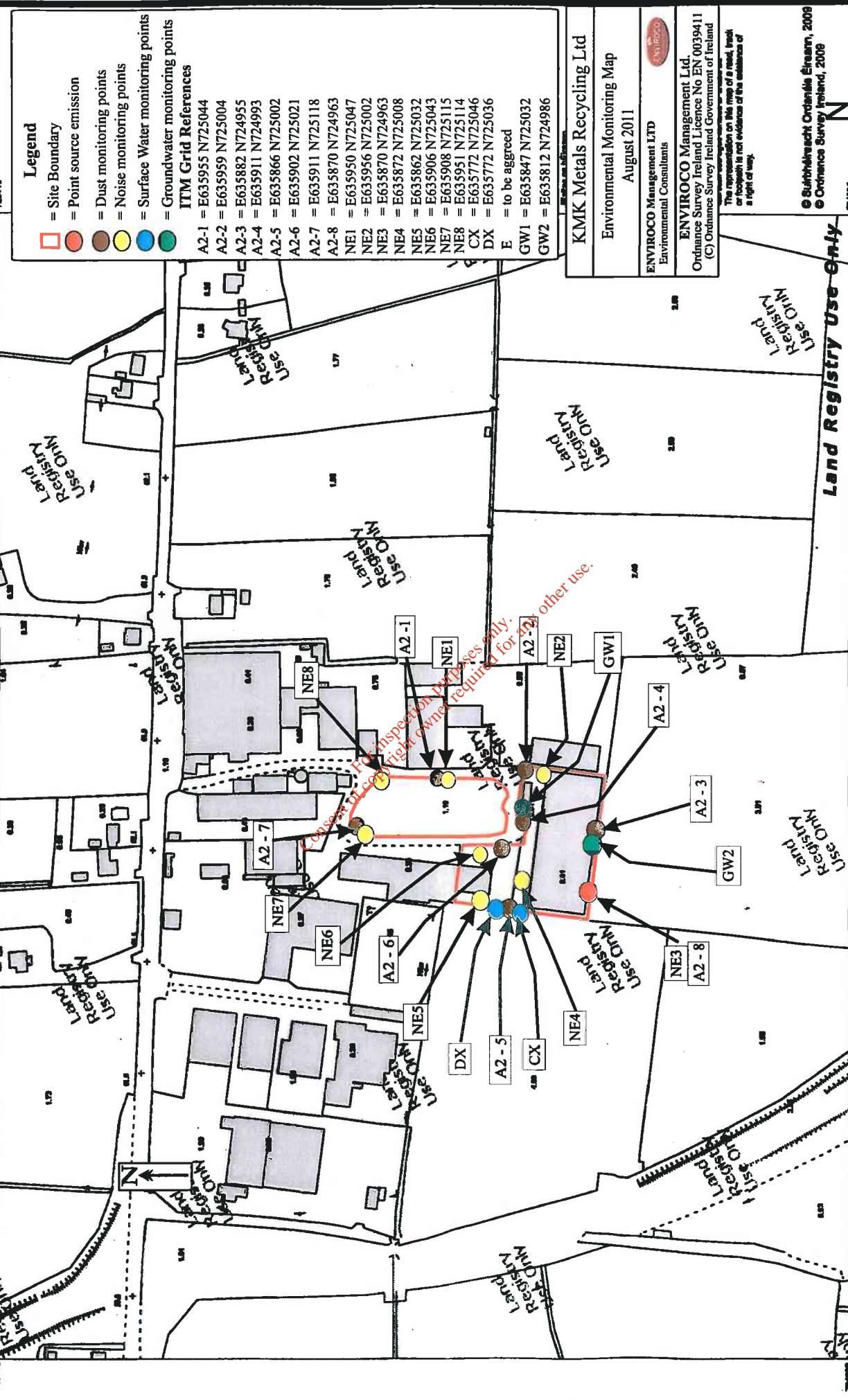
Cc Kurt M Kyck, KMK Metals Ltd, Cappincur Industrial Estate, Tullamore, Co Offaly.

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# Map F.1.1a Environmental Monitoring Locations at the KMK Metals Recycling Ltd Facility

Surveyed 1988-1998  
 Revised 2008  
 Levelled



## Legend

- Site Boundary
- Point source emission
- Dust monitoring points
- Noise monitoring points
- Surface Water monitoring points
- Groundwater monitoring points

## ITM Grid References

- A2-1 = E635955 N725044
- A2-2 = E635959 N725004
- A2-3 = E635882 N724955
- A2-4 = E635911 N724993
- A2-5 = E635866 N725002
- A2-6 = E635902 N725021
- A2-7 = E635911 N725118
- A2-8 = E635870 N724963
- NE1 = E635950 N725047
- NE2 = E635956 N725002
- NE3 = E635870 N724963
- NE4 = E635872 N725008
- NE5 = E635862 N725032
- NE6 = E635906 N725043
- NE7 = E635908 N725115
- NE8 = E635951 N725114
- CX = E635772 N725046
- DX = E635772 N725036
- E = to be agreed
- GW1 = E635847 N725032
- GW2 = E635812 N724986

**KMK Metals Recycling Ltd**  
 Environmental Monitoring Map  
 August 2011

ENVIROCO Management LTD  
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Plot Ref. No. 18587436\_1\_1  
 Plot Date 28-AUG-2008



Scale:- 1:2,800  
 Scale:- 1:2,800