



ENVIRONMENTAL CONSULTANTS
LoCall 1890 522 000

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

31st August 2011

KMK Metals Recycling Ltd (KMK) (Reg No. W0113-04)

Response to your letter dated 10th August 2011 re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations 2004, as amended.

Dear Mr Meaney,

Further to your letter dated 10th August 2011 concerning Article 14(2)(b)(ii) of the regulations, my client now wishes to submit the following information;

- (1) Revised Table B.7.1 and Table H.1(a) as now available on the updated waste licence application 2011 downloaded from www.epa.ie**

I now attach the necessary tables [B.7.1 and H.1(a)] for inclusion with the waste licence review application as directed.



BOW HOUSE O'MOORE STREET TULLAMORE CO. OFFALY
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Registered in Ireland, Number 297801 • Directors: A. Fahey, D. Fahey



B.7 Type of Waste Activity, Tonnages & Fees

B.7.1 Specify the class or classes of activity in Table B.7.1, in accordance with the Third Schedule or Fourth Schedule to the Waste Management Acts 1996 to 2010, as amended by the European Communities (Waste Directive) Regulations, 2011, to which the application relates (check the relevant box(es) and mark the principal activity with a 'P').

Attachment B.7 should identify the principle activity and include a brief technical description of each of the other activities specified. There can only be one principal activity.

TABLE B.7.1 THIRD AND FOURTH SCHEDULES OF THE WASTE MANAGEMENT ACTS 1996 TO 2010

| Waste Management Acts 1996 to 2010 | | | | | |
|---|--|-----|--|---|-----|
| Third Schedule Waste Disposal Operations | | Y/N | Fourth Schedule Waste Recovery Operations | | Y/N |
| D 1 | Deposit into or on to land (e.g. including landfill, etc.). | No | R 1 | <p>Use principally as a fuel or other means to generate energy: This includes incineration facilities dedicated to the processing of municipal solid waste only where their energy efficiency is equal to or above:</p> <ul style="list-style-type: none"> - 0.60 for installations in operation and permitted in accordance with applicable Community acts before 1 January 2009, - 0.65 for installations permitted after 31 December 2008, <p>using the following formula, applied in accordance with the reference document on Best Available Techniques for Waste Incineration: Energy efficiency = $(E_p - (E_f + E_i)) / (0.97 \times (E_w + E_f))$ where—</p> <p>'E_p' means annual energy produced as heat or electricity and is calculated with energy in the form of electricity being multiplied by 2.6 and heat produced for commercial use multiplied by 1.1(GJ/year),</p> <p>'E_f' means annual energy input to the system from fuels contributing to the production of steam (GJ/year),</p> <p>'E_w' means annual energy contained in the treated waste calculated using the net calorific value of the waste (GJ/year),</p> <p>'E_i' means annual energy imported excluding E_w and B_f(GJ/year),</p> <p>'0.97' is a factor accounting for energy losses due to bottom ash and radiation.</p> | No |
| D 2 | Land treatment (e.g. biodegradation of liquid or sludgy discards in soils, etc.). | No | R 2 | Solvent reclamation/regeneration. | No |
| D 3 | Deep injection (e.g. injection of pumpable discards into wells, salt domes or naturally occurring repositories, etc.). | No | R 3 | Recycling /reclamation of organic substances which are not used as solvents (including composting and other biological transformation | No |

WASTE Application Form

| | | | | | |
|------|--|----|------|--|-----|
| | | | | processes), which includes gasification and pyrolysis using the components as chemicals. | |
| D 4 | Surface impoundment (e.g. placement of liquid or sludgy discards into pits, ponds or lagoons, etc.). | No | R 4 | Recycling/reclamation of metals and metal compounds. | Yes |
| D 5 | Specially engineered landfill (e.g. placement into lined discrete cells which are capped and isolated from one another and the environment, etc.). | No | R 5 | Recycling/reclamation of other inorganic materials, which includes soil cleaning resulting in recovery of the soil and recycling of inorganic construction materials. | Yes |
| D 6 | Release into a water body except seas/oceans. | No | R 6 | Regeneration of acids or bases. | No |
| D 7 | Release to seas/oceans including sea-bed insertion. | No | R 7 | Recovery of components used for pollution abatement. | Yes |
| D 8 | Biological treatment not specified elsewhere in this Schedule which results in final compounds or mixtures which are discarded by means of any of the operations numbered D 1 to D 12. | No | R 8 | Recovery of components from catalysts. | Yes |
| D 9 | Physico-chemical treatment not specified elsewhere in this Schedule which results in final compounds or mixtures which are discarded by means of any of the operations numbered D 1 to D 12 (e.g. evaporation, drying, calcinations, etc.). | No | R 9 | Oil re-refining or other reuses of oil. | No |
| D 10 | Incineration on land. | No | R 10 | Land treatment resulting in benefit to agriculture or ecological improvement. | No |
| D 11 | Incineration at sea (this operation is prohibited by EU legislation and international conventions). | No | R 11 | Use of waste obtained from any of the operations numbered R 1 to R 10. | Yes |
| D 12 | Permanent storage (e.g. emplacement of containers in a mine, etc). | No | R 12 | Exchange of waste for submission to any of the operations numbered R 1 to R 11 (if there is no other R code appropriate, this can include preliminary operations prior to recovery including pre-processing such as, amongst others, dismantling, sorting, crushing, compacting, pelletising, drying, shredding, conditioning, repackaging, separating, blending or mixing prior to submission to any of the operations numbered R1 to R11). | Yes |
| D 13 | Blending or mixing prior to submission to any of the operations numbered D 1 to D 12 (if there is no other D code appropriate, this can include preliminary operations prior to disposal including pre-processing such as, amongst others, sorting, crushing, compacting, pelletising, drying, shredding, conditioning or separating prior to submission to any of the operations numbered D1 to D12). | No | R 13 | Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced). | P |
| D 14 | Repackaging prior to submission to any of the operations numbered D 1 to D 13. | No | | | |
| D 15 | Storage pending any of the operations numbered D 1 to D 14 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced). | No | | | |

SECTION H MATERIALS HANDLING

H.1 Waste Types and Quantities – Existing & Proposed

Provide an estimation of the quantity of waste likely to be handled in relation to each class of activity applied for. This information should be included in Table H.1(a).

TABLE H.1(A). QUANTITIES OF WASTE IN RELATION TO EACH CLASS OF ACTIVITY APPLIED FOR

| Waste Management Acts 1996 to 2010 3rd Schedule (Disposal) Operations | | Waste Management Acts 1996 to 2010 4th Schedule (Recovery) Operations | |
|--|----------------|--|---|
| Class of Activity Applied For | Quantity (tpa) | Class of Activity Applied For | Quantity (tpa) |
| Class D 1 | 0 | Class R 1 | 0 |
| Class D 2 | 0 | Class R 2 | 0 |
| Class D 3 | 0 | Class R 3 | 0 |
| Class D 4 | 0 | Class R 4 | 30,000 (this figure relates to the acceptance for recovery and recycling of the metal fraction of all wastes accepted on-site) |
| Class D 5 | 0 | Class R 5 | 5,000 (this figure relates to the acceptance of plastic components and packaging as part of incoming waste loads) |
| Class D 6 | 0 | Class R 6 | 0 |
| Class D 7 | 0 | Class R 7 | 300 (this figure relates to the acceptance of auto catalysts, filters etc.) |
| Class D 8 | 0 | Class R 8 | 100 (this figure relates to the recovery of metals from catalysts in manufacturing processes both liquids and solids) |
| Class D 9 | 0 | Class R 9 | 0 |
| Class D 10 | 0 | Class R 10 | 0 |
| Class D 11 | 0 | Class R 11 | 100 (this figure relates to the re-use of some waste materials e.g. metal drums, IBCs, cardboard boxes and textile IBC bulk bags for waste receptacles) |
| Class D 12 | 0 | Class R 12 | 35,000 (this figure relates to all wastes being accepted on-site undergo a process of dismantling, sorting, separation, repackaging, shredding, crushing etc) |
| Class D 13 | 0 | Class R 13 | 35,000 (this figure relates to the fact that all wastes being accepted on-site are stored temporarily) |
| Class D 14 | 0 | | |
| Class D 15 | 0 | Total | 35,000 (this figure relates to the overall sum total of all wastes to be accepted on-site as previously described in R4, R5, R7, R8, R11, R12 and R13) |

In Table H. 1 (B) provide the annual amount of waste handled/to be handled at the facility. Additional information should be included in Attachment H.1. The tonnage per annum should be given of that expected for the life of the licence, with at least the next five years tonnages provided. For Landfill Review applications provide an estimate of the quantity of waste already deposited in (i) lined cells; (ii) unlined cells.

- (2) Information relating to article 12(1)(v) of the Waste Management (Licensing) Regulations, 2004 as amended in relation to the waste hierarchy in section 21A of the amended Waste Management Acts 1996 to 2011.

KMK notes the updates made to the 'waste hierarchy' as referred above, and illustrated below in order of priority;



Therefore KMK proposes to apply the principal of the waste hierarchy in their operations of the waste management facility.

A description of how the waste hierarchy will be applied is given in Table 1 below;

Table 1:

| Waste hierarchy element | Definition as per EC (Waste Directive) Regulations 2011 | Description how KMK is applying the principal |
|-------------------------|---|---|
| Prevention | <p>Means measures, taken before a substance, material or product has become waste, that reduce- (a) the quantity of waste, including through the re-use of products or the extension of the lifespan of products, (b) the adverse impacts of the generated waste on the environment and human health, or (c) the content of harmful substances in materials and products.</p> | <p>KMK is not a manufacturing company but is a waste management facility and all materials arriving to the site are wastes. All wastes accepted at KMK are screened prior to acceptance to ensure that they primarily consist of materials which can be sent for recycling and recovery. All incoming wastes are accepted, processed and exported for recycling and/or recovery with minimal disposal being carried out. Therefore the principal of waste 'prevention' is generally not applicable to KMK apart from instances where wastes are generated internally. These instances are limited to small quantities of canteen, packaging and cleaning wastes. All of these wastes are recycled where possible at approved sites.</p> |
| Preparing for re-use | <p>Means checking, clearing or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing.</p> | <p>All wastes accepted at KMK are screened prior to acceptance to ensure that they primarily consist of materials which can be sent for recycling and recovery. This principal is not directly applicable to KMK because all waste accepted to the facility are processed for further recovery and recycling and not for direct re-use with the exception of the re-use of some waste materials e.g. metal drums, IBCs, cardboard boxes and textile IBC bulk bags for waste receptacles. Furthermore, KMK acknowledge the re-use requirements being discussed in the recast WEEE Directive, and will adopt their processes to take any changes into account as part of future site activities.</p> |

Table 1

| Waste hierarchy principal | Definition as per regulations | Description how KMK Metals is applying the principal |
|---------------------------|--|---|
| Recycling | <p>Means and recovery operation by which waste materials are reprocessed into products, materials or substances, whether for the original or other purposes, including the reprocessing of organic material, ..does not include- (i) energy recovery, and (ii) the reprocessing into materials that are to be used as fuels for backfilling operations.</p> | <p>All wastes accepted at KMK are screened prior to acceptance to ensure that they primarily consist of materials which can be sent for recycling and recovery. This principal is applicable to KMK by virtue of the proposed activity of WEEE processing via the new WEEE processing plant. This plant will extract all incoming WEEE into its constituent metals and non metals parts. The metals will be sorted into ferrous and non ferrous, stored and exported off-site direct to facilities for use as replacements of raw materials in metals refinement/manufacture. All non metals parts will be sent for further recovery.</p> |
| Recovery | <p>(a) means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy, and (b) without prejudice to the generality of paragraph (a), includes the recovery operations listed in the Fourth Schedule.</p> | <p>This principal is applicable to KMK because of the following activities occurring on-site; wastes acceptance, sorting, dismantling to constituent parts, crushing, baling, appropriate storage. These activities are preparing the wastes for further recycling and recovery at other approved facilities off-site. Recovery is the principal method of treatment for incidental wastes that arise from KMK's activities.</p> |

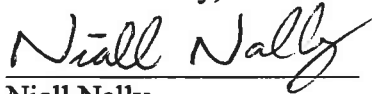
Table 1

| Waste hierarchy principal | Definition as per regulations | Description how KMK Metals is applying the principal |
|---------------------------|---|--|
| Disposal | (a) means any operation which is not recovery even where the operation has a secondary consequence the reclamation of substances or energy, and (b) without prejudice to the generality of paragraph (a), includes the disposal operations listed in the Third Schedule | <p>All wastes accepted at KMK are screened prior to acceptance to ensure that they primarily consist of materials which can be sent for recycling and recovery.</p> <p>KMK does not engage in disposal activities on-site.</p> <p>All wastes accepted are processed for recovery and/or recycling on-site and off-site.</p> <p>The proposed WEEE processing plant will generate small amounts of non recyclable dust and packaging materials but these are incidental when compared to the recycling fraction achieved for metals and non metal materials.</p> <p>Disposal is the last option for incidental wastes arising from activities on-site and only after all further recovery and/or recycling options have been considered.</p> <p>Therefore the disposal principal is not generally applicable to KMK.</p> |

A revised non technical summary is attached which reflects the aforementioned information and also the present and future site operations at the facility.

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

Yours Sincerely,

A handwritten signature in cursive script that reads "Niall Nally". The signature is written in black ink and is positioned above a horizontal line.

Niall Nally

Senior Environmental Consultant

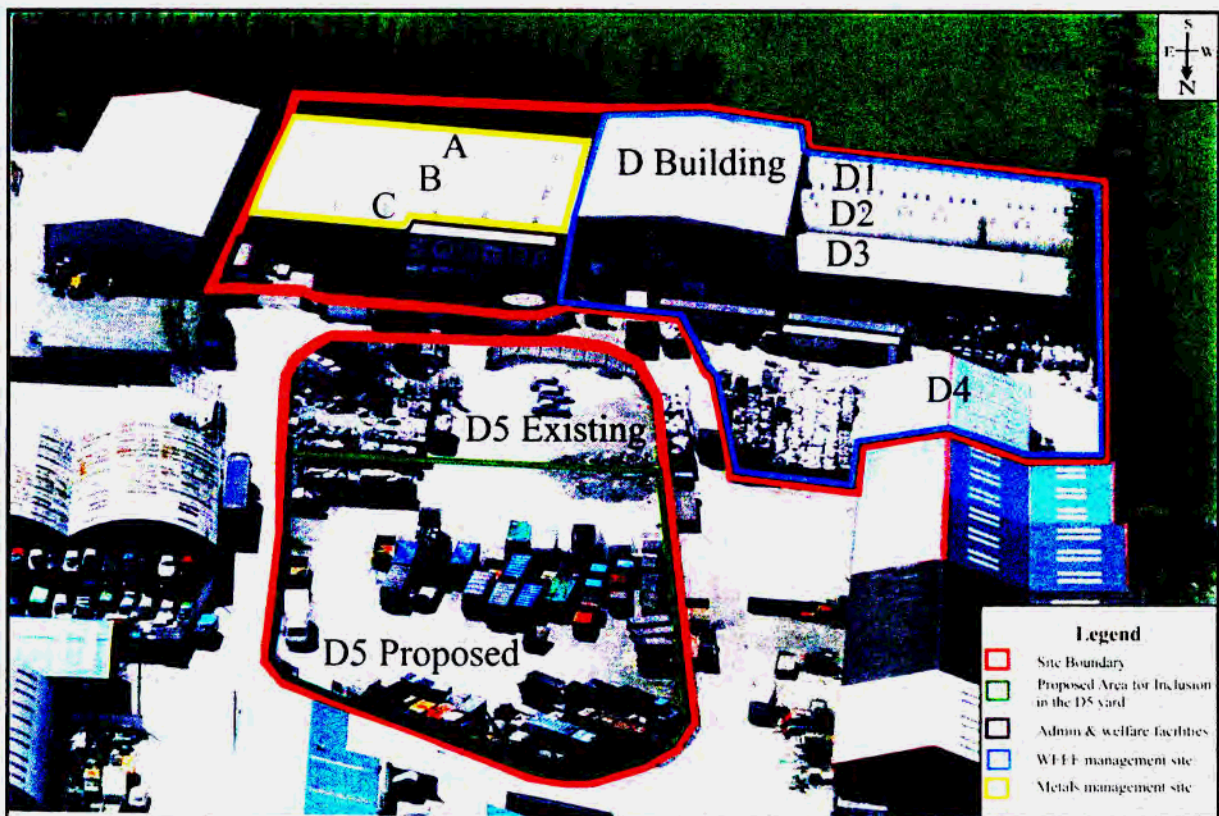
Cc Kurt M Kyck, KMK Metals Recycling Ltd, Cappincur Industrial Estate,
Tullamore, Co Offaly.

ENVIRONMENTAL PROTECTION
AGENCY
02 SEP 2011

**ATTACHMENT A
NON TECHNICAL SUMMARY
REVISED 31-08-2011 FOR W0113-04**

General Description of the proposed development:

The KMK Metals Recycling Ltd facility is located in Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly (Grid Ref: E635890 N725043) and illustrated on the locations maps; Map A and Map A.1 (previously submitted in the waste licence review application). The facility operates as a hazardous and non-hazardous metals waste transfer station specialising in metallic and WEEE wastes. It is the intention of KMK Metals Recycling Ltd to incorporate the remaining yard area beside the existing D5 yard and to increase the permitted annual tonnage for waste acceptance at the facility from 20,000tonnes to a maximum of 35,000tonnes into the remit of the existing waste license ref: W0113-03. The proposed area to be included in the revision of the existing D5 yard is to include an additional piece of industrial land (2,913m²) which will be developed on a phased basis. This new area of the site will be renamed as E area. A photo below illustrates the existing site including the area proposed for inclusion in the new waste licence i.e. D5 existing and D5 proposed and to be renamed as E area of the new waste licence subject to grant of same.



At the time of waste license review submission in October 2009 it was proposed to construct roof/canopies at either side of D4 building (planning permission granted 04/09/09 and ref: 09/311). Since that time, planning permission was granted to demolish D1,D2,D3 buildings and replace with a new single building construction called D3X at the site (planning permission granted in 15/10/10 and ref: 10/101). These buildings (including building E) are now constructed and are diagrammatically illustrated (superimposed) in the photo below;



The new proposed E area will be used as follows:

- Car parking for employees, visitors and KMK waste collection vehicles
- Temporary storage of WEEE waste in approved receptacles/skips/containers during peak waste acceptance times. The quantities to be stored will be appropriate to the nature of an overflow waste storage area.
- It is proposed to construct a 1,152m² building structure within E area as per layout drawing (ref; CY-02) attached to the original review application. The purpose of this building will be for WEEE waste acceptance prior to on-wards processing at D areas of the existing site and also for temporary storage of pre-treated WEEE prior to export from KMK Metals.
- Storage of empty receptacles/skips/containers used by KMK Metals for off-site usage.

-
- Waste collection vehicle marshalling and control.
 - Weighbridge usage.

The development of E area is conducted on a phased basis as follows;

Phase 1 – Construction of the proposed new building at E area as per layout plan CY-02.

Phase 1 – Surface infrastructure for; staff and visitor car park (tarmac type), access route (concrete road) through E area, weighbridge installation and some surfacing of remaining E area (concrete type). Install interceptor unit for surface water run-off from surfaced areas.

Phase 2 – Repairs, maintenance and modifications to the palisade fence boundary of E area including new sliding entrance gates.

KMK Metals Recycling Ltd proposes to increase the capacity of the overall site from 20,000 tonnes to a maximum of 35,000 tonnes per year, of metals and waste electrical and electronic equipment (WEEE). The proposed additional waste tonnage is to be the same wastes in type and description to that currently acceptable in the waste licence. In light of the 'Duty and Stand-by Capacity Report' submitted to the Agency in 2009, this report concluded that there is adequate storage facilities at the site for additional tonnages of WEEE in a safe and secure manner.

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
- reduce the reliance on direct export of WEEE from sources (civic amenity sites and commercial sites)
- assist in the pre-treatment of WEEE (removal of hazardous components and sorting WEEE by categories) which is necessary for efficient and appropriate export.

Hence the proposed changes to the facility will thereby provide a more sustainable solution to waste management within Ireland.

Site location and layout maps are shown in attachment B2 of the review 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 being 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. Bow House, O'Moore Street, Tullamore, Co Offaly have 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.

(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 W0113-03 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 E area will be as follows:

- Surface water run-off from the tarmac and concrete surface areas of the site will be directed via gullies to a proposed interceptor unit prior to connection to the existing shared drain in the industrial estate which serves to remove surface water run-off from a number of commercial businesses. KMK Metals proposes to develop E area by means of weighbridge, fencing, entrance gates etc. In addition, a building structure will be installed to cover a section of E where incoming WEEE may be stored temporarily prior to movement to existing process areas within the facility. Drainage from the proposed building roof will be diverted to the existing drainage infrastructure directly and thus bypass the proposed interceptor unit.

(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, Daingean Road, Tullamore, Co. Offaly, this can be found on an A3 1:2,500 Ordnance Survey Map at grid reference E635890 N725043, see Map A.1 attached to the review application.

- (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 W0113-03. This facility is currently licensed to handle 20,000 tonnes of waste. Collected waste arrives as either metallic materials or WEEE materials. All metallic based wastes are accepted, sorted and stored inside a designated building prior to off-site export for further recovery. All incoming WEEE materials are pre-treated. Pre-treatment consists of sorting the WEEE materials into the various categories e.g. large household appliances, small household appliances, TVs and monitors, fridges & freezers etc. In addition, batteries are removed from the WEEE (e.g. power tools have batteries removed). The small household appliances are baled to increase bulk storage and removal efficiency. The resultant WEEE is exported in a safe and fully authorised manner to approved recovery outlets in UK and Europe.

As part of future proposed site operations, KMK Metals Recycling Ltd proposes to accept and process up to 35,000 tonnes per annum of metallic and WEEE. It is expected that approximately 80% of the waste intake figure will account for WEEE and the remaining 20% of incoming waste will be metallic based materials.

In addition, to supplement the review submission in October 2009, KMK Metals Recycling Ltd has submitted an unsolicited further information proposal to the EPA concerning the proposed installation and operation of a new WEEE processing plant (submission dated 11th August 2011). 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. All operations will occur inside the newly constructed D3X building. The process is both effective and appropriate to the volume of material available in Ireland. 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 (metals refinement/manufacture) without the need for any intermediate treatment facility.

In terms of waste for disposal, the only waste to be sent to landfill from the facility is canteen waste (wheelie bin provider) and minimal amounts of floor sweepings at the WEEE process buildings. The proposed WEEE processing plant will generate small amounts of non recyclable dust and packaging materials but these are incidental when compared to the recycling fraction achieved for metals and non metal materials. Disposal is the last option for incidental wastes arising from activities on-site and only after all further recovery and/or

recycling options have been considered. Therefore the disposal principal is not generally applicable to KMK.

- (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 W0113-03 and therefore the types of activity to be carried out at the revised site remain the same. However, in relation to the amended waste license application form 2011 and the revisions to the Fourth Schedule of the Waste management Acts 1996 to 2011, KMK Metals Recycling Ltd now confirms the following classes of activities for the site:

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

R 13 of the Fourth Schedule (Waste Recovery Operations) of the Waste Management Acts (1996-2011): Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).

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

Consequently, other activities carried out on site include;

R 4 of the Fourth Schedule (Waste Recovery Operations) of the Waste Management Acts (1996-2011): Recycling/reclamation of metals and metal compounds.

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

R 5 of the Fourth Schedule (Waste Recovery Operations) of the Waste Management Acts (1996-2011): Recycling/reclamation of other inorganic materials, which includes soil cleaning resulting in recovery of the soil and recycling of inorganic construction materials.

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

R 7 of the Fourth Schedule (Waste Recovery Operations) of the Waste Management Acts (1996-2011): Recovery of components used for pollution abatement.

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

R 8 of the Fourth Schedule (Waste Recovery Operations) of the Waste Management Acts (1996-2011): Recovery of components from catalysts.

Non Technical Description: Recovery of metals from catalysts in industrial and commercial processes (this applies to liquids and solids)

R 11 of the Fourth Schedule (Waste Recovery Operations) of the Waste Management Acts (1996-2011): Use of waste obtained from any of the operations numbered R 1 to R 10.

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

R 12 of the Fourth Schedule (Waste Recovery Operations) of the Waste Management Acts (1996-2011): Exchange of waste for submission to any of the operations numbered R 1 to R 11 (if there is no other R code appropriate, this can include preliminary operations prior to recovery including pre-processing such as, amongst others, dismantling, sorting, crushing, compacting, pelletising, drying, shredding, conditioning, repackaging, separating, blending or mixing prior to submission to any of the operations numbered R1 to R11).

Non Technical Description: Wastes on-site being subjected to processes of dismantling, sorting, separation, repackaging, shredding, crushing etc

- (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: W0113-03

However, it is intended to increase the quantities from the existing 20,000 to 35,000 tonnes maximum for waste acceptance per year. The capacity of the existing buildings, processing areas and proposed additional land will be more than adequate to cater 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 significant changes from the existing waste licence W0113-03 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 following additional processes are proposed;

- Portable household battery acceptance and sorting prior to export for further recovery. This initiative being conducted by KMK Metals will have the effect of removal of these batteries from the waste streams being currently landfilled in Ireland.
- WEEE processing plant (unsolicited further information submission dated 11th August 2011). The new process plant 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 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. The proposed hours as detailed above will provide for adequate flexibility of activities in the event of any contingency plans at the site where additional time is required for specific waste handling projects.

Future operations proposed for E area will be: car parking, WEEE acceptance, weighbridge usage, temporary storage of incoming WEEE and outgoing WEEE for export, vehicle marshalling.

Future operations proposed for D3X building will be: the WEEE processing plant as previously described.

(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 licence W0113-03. These emissions do not result in the contravention of any relevant standard. The proposed E area within the waste licence boundary will not result in significant or otherwise adverse emissions to environment. The proposed WEEE processing plant at D3X building will result in a new emission point source (noise and dust emission point). This emission will not be significant due to the robust

noise and dust treatment technologies which are further explained in the document labelled **strictly confidential information** and dated 11th August 2011

- (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 existing outside yard areas is treated by interceptors before entering a land drain.
 - The proposed dust and noise emissions from the WEEE treatment process will be sufficiently controlled to levels which will not cause adverse impacts to the environment.
 - The Environmental Management System (EMS) for the site is effective at controlling all potential emissions from the working facility.
- (c) The Best Available Techniques (BAT) 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: W0113-03.
- (e) In the event of decommissioning the facility, KMK Metals Recycling Ltd will follow the procedures as defined under the granted licence and specified in the Decommissioning Plan which has been submitted to the Agency as part of compliance with license W0113-03. A financial bond will be entered to ensure funds will be available to carry out such works as are needed.
- (f) Vehicles and machinery will be regularly maintained to prevent wear and tear that can lead to increased energy consumption.
- (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. The annual noise monitoring will occur as per the conditions of the licence, in the event of a complaint further noise monitoring will be conducted at the site.
- (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 decommissioning 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 W0113-03 with the exception of inclusion of additional ambient monitoring locations for on-going dust and noise.

Similarly, the proposed WEEE processing plant will result in a noise and dust point source emission. This emission will be controlled and mitigated sufficiently to ensure no adverse impacts on the environment.

Water and wastewater stream flows are outlined in section 12.(1).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 licence ref: W0113-03.

Potential dust and noise emissions from the proposed E area are not expected to cause nuisance conditions on-site or beyond the site boundaries. Control measures will further ensure this such as processing of waste inside buildings, only temporary outside storage of waste prior to processing and/or export from the facility. Good house keeping measures will also ensure that dust and litter generation is eliminated or kept to a minimum.

All storm water runoff from the existing site is diverted through the two existing surface water interceptors prior to discharge to the existing land drain west of the site. Run-off from the proposed surfaced areas of E will be directed via gullies to a proposed interceptor unit prior to connection to the existing shared drain in the industrial estate which serves to remove surface water run-off from a number of commercial businesses. KMK Metals proposes to develop E area by means of weighbridge, fencing, entrance gates etc. In addition, a building structure will be installed to cover a section of E where incoming WEEE may be stored temporarily prior to movement to existing process areas within the facility. Drainage from the proposed building roof will be diverted to the existing drainage infrastructure directly and thus by-pass the proposed interceptor unit. The proposed new E area in this application will be used for temporary storage of WEEE contained within their respective receptacles/skips during peak times of waste acceptance prior to processing at existing locations within the facility. Future development of E area will be conducted on a phased basis and priority given to operational needs and environmental protection as illustrated in the layout drawing (ref; CY-02) attached to this review application.

There will be no discharges to sewer from the site. All domestic sewage is treated on-site by the waste water treatment plant (WWTP) (e.g. Biocycle type unit) with final treated effluent being discharged to soak-away. The proposed addition of waste acceptance tonnage and lands to this site will not affect the population usage of the WWTP and will not impact on its treatment capability.

KMK Metals have been advised by Offaly County Council that as part of future plans for development of Cappincur Industrial Estate, a foul sewer network will be installed and hence will be available to all occupants of the estate. KMK Metals will avail of this improvement to foul services once available.

In terms of the proposed WEEE processing plant installed inside D3X building, there will be a point source emission for noise and dust which will be sourced from the outside fan associated with the dust extraction system from the WEEE plant. This fan will be on the south facing side of the newly constructed D3X building and therefore emitting controlled noise and dust towards agricultural land which is presently zoned industrial. The estimated noise emissions from the fan unit is given as 84dB at 1 metre distance. Hence, the expected noise levels at 40m from the fan will be 52dB (i.e. less than 55dB) and below nuisance levels. In relation to dusts, these will be exhausted to a duct/ventilation system and directed to the proposed dust collection system (bag house type) for treatment. The principal here is that the dusty incoming air enters the baghouse and is subsequently filtered. Dusts are captured in the bag and cleaned air passes through it and forced out by the fan. Baghouse filters are known for their efficiency and cost effectiveness. Based on information received from the manufacturer of the dust collector system, the residual dust to be emitted is approximately $10\text{mg} / \text{m}^3$. This proposed dust emission is considered low.

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 E area and D3X building in relation to Dust and Noise emissions only.

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

All wastes accepted at KMK are screened prior to acceptance to ensure that they primarily consist of materials which can be sent for recycling and recovery. All incoming wastes are accepted, processed and exported for recycling and/or recovery with no disposal being carried out on-site.

- (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 W0113-03.

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- (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, traffic accidents and spillages are potential 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 existing company Emergency Response Procedure (ERP) as part of ISO 14001. Therefore the ERP in force at the existing site (W0113-03) will be modified to take into account the proposed E area of the site and the proposed increase in tonnages. The inclusion of E will have a positive effect on traffic management at the facility by way of direct access to the facility and reduce heavy vehicle traffic exposure on the public road in the estate.

- (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 potential 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 or technical amendment submission with the EPA will be arranged. Decommissioned equipment will be 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 decontamination where necessary, 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.
- Ongoing monitoring shall be carried out by an approved EPA consultancy and records of all monitoring shall be maintained after the closure process.
- A Clean Closure verification audit shall be completed by an approved EPA consultancy which will confirm that clean closure has been achieved by the facility. Details of this audit shall then be submitted to the Agency.

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

A Decommissioning Plan for the facility has been submitted to the Agency along with an Environmental Liabilities Risk Assessment (ELRA) in compliance with Conditions 10.2.1 and 12.3.2 of the facilities waste licence; W0113-03. 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 €64,000 for these eventualities. This bond has been re-assessed as part of the 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.