

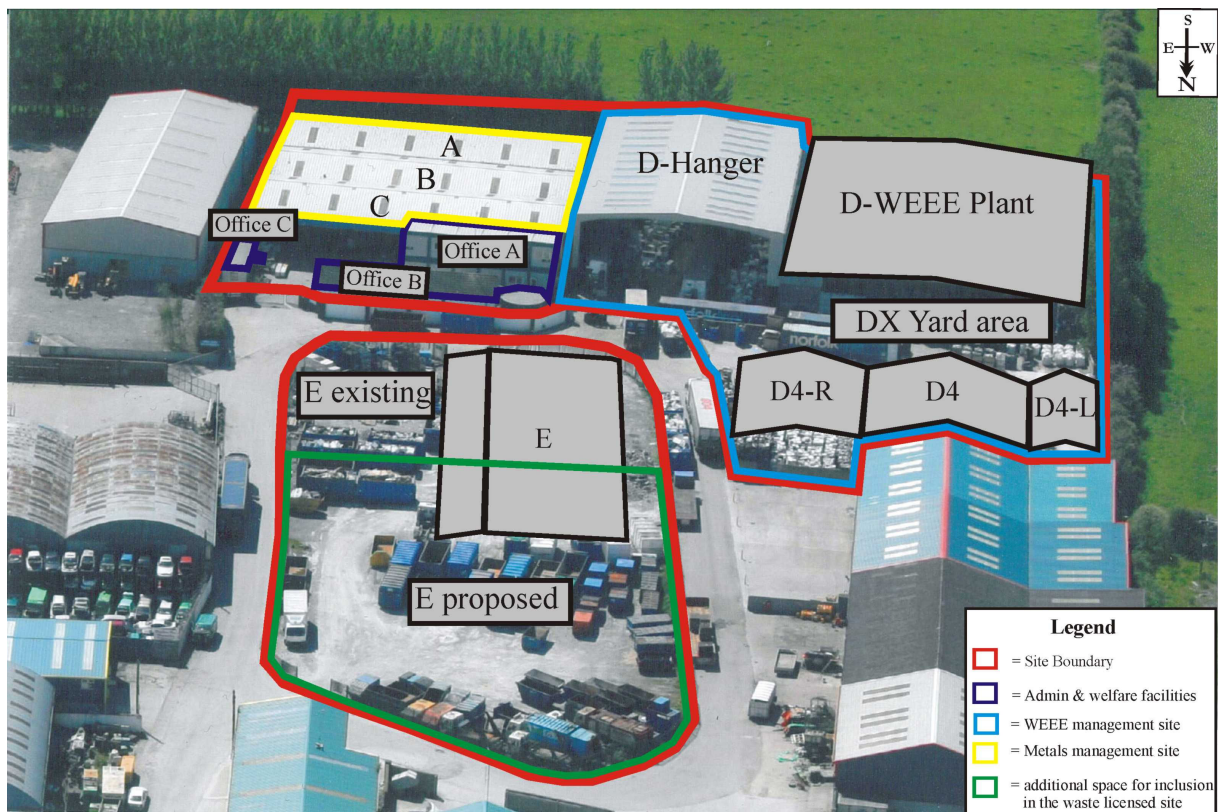
ATTACHMENT A
NON TECHNICAL SUMMARY
REVISED 06-03-2012 FOR W0113-04

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 land area beside the existing E 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 additional waste tonnage is to be the same wastes in type and description to that currently acceptable in the waste license.

The proposed area to be included is an additional piece of industrial land (2,913m²) which is being developed at present under existing planning permissions and over a phased basis. This new area of the site will be renamed as E area. A modified photo below illustrates the existing site including the area proposed for inclusion in the new waste licence i.e. E existing and E proposed and to be renamed as E area of the new waste licence subject to grant of same.



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.

The descriptions of the operations at the facility are described in the table over-leaf.

The brief non technical descriptions of KMK's operations at all locations on-site are summaries as follows:

Area	Building Refs	Description of waste processes. ^{note 1}
Metallic wastes, sludges and liquids management	A (self bundled & secure)	Dedicated storage for non-ferrous metals, base metal fractions, and packaged filter cakes arriving directly from customers via KMK Metals (brand) collections.
	B (bundled & secure)	<p>This building is split into two separate locations i.e. a double bunded area with sump and a regular area with separate activities as follows:</p> <p><u>Double bunded area with sump.</u></p> <ul style="list-style-type: none"> ○ Dedicated bunded storage for: waste oil removed from Oil Filled Radiators (at the D-Hanger building on-site); Lead Acid Batteries; sludges (typically clay consistency); tradable metal containing liquids; and other materials (capacitors, ionisation chamber smoke detectors, and packaged nickel-cadmium batteries). <p><u>Regular B building area.</u></p> <ul style="list-style-type: none"> ○ This area is used for sorting and repackaging of dry materials.
	C	<p>This building is split into two separate locations i.e. an insulated secure warehouse area and a materials loading and off-loading area. The respective activities are as follows:</p> <p><u>Insulated secure warehouse area</u></p> <p>This serves as an insulated, dry storage area, and can be used for dismantling / sorting when not required for insulated dry storage. Presently, it houses KMKs E-Scrap Dismantling Station and Tubes/Bulbs Sorting Area.</p> <ul style="list-style-type: none"> ○ E-Scrap: KMK's Electronic Scrap dismantling station serves the purpose of dismantling items which are either too robust for KMKs WEEE Plant or which require manual disassembly for better recovery of component parts ○ Fluorescent Tubes and Light Bulbs of all types are collected typically by KMKs Van Drivers; they are delivered here where they are recorded and sorted by type, before being sent offsite for further recycling at facilities which specialises in recovery of glass and metal from tubes/bulbs. <p><u>Materials loading and off-loading area</u></p> <ul style="list-style-type: none"> ○ This area is used for off-loading (of incoming materials) and loading of materials arising from KMKs processes, plus temporary storage (under cover) of large bulky metal items and packaged items awaiting transport offsite.
Admin. and Welfare	Office A, B, C	Includes the main reception area and offices, meeting rooms, canteens and toilet facilities.

Area	Building Refs	Description of waste processes. ^{note 1}
WEEE Management	D-Hanger	<p>The Hanger building is an open ended dedicated WEEE receipt, bulk acceptance and pre-sorting area, with a large storage bay for pre-sorted WEEE pending processing through the WEEE Plant.</p> <p>The activities inside the Hanger are as follows;</p> <ul style="list-style-type: none"> ○ Pre-sorting of WEEE, this involves manually removing any item which is destined for processing elsewhere other than in the WEEE Plant (i.e. Monitors, Televisions, Oil Filled Radiators, Central Processing Units, and large / robust items which are dismantled as Electronic Scrap) and other items which are not suitable for the WEEE Plant (i.e. Paper, Wood, Compressed Cylinders). The removed items are collected in cages / bins and dispatched by fork lift truck to other areas on-site for processing. ○ Oil filled radiator de-pollution (removal of oil) takes place in the Hanger Building, on a purpose built and banded frame, with a drip tray which feeds into an IBC. ○ Bulk acceptance and loading takes place under cover for materials for off-site export.
	D-WEEE Plant	The D-WEEE Plant fully enclosed secure building houses a dedicated Smasher Process for WEEE treatment i.e. a dedicated process for mechanical disassembly, granulation, shredding, and sorting of the various components of WEEE (plastics, metals, batteries, cables, capacitors and other handpicked items).
	D4	This building is used to dismantle Cathode Ray Tube (CRT) monitors and televisions.
	D4-R	This building is currently used for Washing Machine Depollution and Steel Baling.
	D4-L	This building is used for Household Batteries Sorting.
	DX (Yard)	This area is used for off-loading and loading of WEEE, including Large Household Items.
WEEE management	E Building	<p>This building has been created for additional storage and processing capacity of materials incoming and outgoing. Future planned activities will be as follows:</p> <ul style="list-style-type: none"> - KMK requires the flexibility to be permitted to relocate specific individual processes within E building for example but not limited to the operations previously described at D4-R building. - KMK may also require an air emissions point from E building (the precise nature and location of which is to be confirmed), to allow for a ventilation/extraction system should it be required in the future and associated with a waste treatment process.
	EX (Yard)	<p>This area is to be used for the following activities:</p> <ul style="list-style-type: none"> ○ Logistics and vehicle movements ○ Weighbridge usage and maintaining records ○ Storage for incoming waste materials and skips, containers ○ Staff car parking
	Note 1 =	All incoming wastes and materials to KMK Metals are profiled off-site by management prior to acceptance at the facility. This procedure ensures that all wastes are approved for acceptance to the site (under the terms of Waste Licence W0113-03) and that they are suitable prior to delivery at the facility. This waste profiling thus ensures minimal needs for waste quarantine requirements at the facility.

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 provide a more sustainable solution to waste management within Ireland
- reduce the reliance on direct export of WEEE from sources (civic amenity sites and commercial sites)
- assist in the treatment of WEEE (removal of hazardous components, dismantling and sorting WEEE) which is necessary for efficient and appropriate export.

Site location and layout maps are shown in attachment B2 of the Waste Licence 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. KMK is a registered business, Ref: 67176, with telephone number 057 934 1634. The facility is owned and operated by KMK.

ENVIROCO Management Ltd. Bow House, O'Moore Street, Tullamore, Co Offaly, Tel: 057 935 2200 submit this application, as consultants, acting on behalf of KMK, 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 (after attenuation tank storage) 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 weighbridges, fencing and pre-cast concrete walls, entrance gates etc. In addition, a building will be installed to cover a section of E where incoming WEEE may be stored and/or processed 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.

- 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. The descriptions of operations at the facility in terms of metals and WEEE treatment are previously described the aforementioned tables on pages 3 to 6.

The resultant WEEE and associated materials (principally direct metals recovery e.g. copper, aluminium, steel and other non ferrous mixtures) 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 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.

Please refer to the descriptions of waste processes tables previously for relevant details.

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 and processing, weighbridge usage, temporary storage of incoming WEEE and outgoing WEEE for export, vehicle marshalling, logistical movements.

- 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, although a possible dust emission point may be required as part of future operations at the E building. The WEEE processing plant at the WEEE building will result in a new mission point source (noise and dust emission point). This emission will not be significant due to the robust noise and dust treatment technologies associated with the WEEE plant operation.
- 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 pass through interceptor units 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.
 - KMK actively maintain an Environmental Management System (EMS), which is routinely audited by the National Standards Authority of Ireland and certified for compliance with the ISO 14001:2004 Environmental Management Standard.
- 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 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 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 license, 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 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 will be changes planned from the existing waste licence W0113-03. These are; inclusion of additional ambient monitoring locations for on-going dust and noise, the proposed WEEE processing plant will result in a noise and dust point source emission (NE3/A2-8) and a possible future air extraction emission point within E building (the exact location and nature of emission to be agreed with the Agency in advance). All emissions will be controlled and mitigated sufficiently e.g. a bag house treatment unit for dusts treatment from the WEEE building. Noise will be controlled at source via

noise insulated enclosure structures within the WEEE building 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 and the WEEE Building 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 two weighbridges, boundary walls, fencing, entrance gates etc. In addition, a building structure will be installed to cover a section of E where incoming WEEE may be stored and processed. 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 and processing of WEEE (previously described in the operations descriptions tables on page 3 to 6). Future development of E area will be as per the layout plan; Drawing No: 10-001-C02 Rev A attached.

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.

In terms of the WEEE processing plant installed inside WEEE 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 WEEE Building and therefore emitting controlled noise and dust towards agricultural land which is presently zoned industrial. The estimated noise emission 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.

- (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 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 and 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 land-filling 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.