

## Bea Claydon

---

**From:** Niall Nally <Niall.Nally@enviroco.ie>  
**Sent:** 09 March 2012 14:44  
**To:** Brian Meaney  
**Subject:** KMK Metals Recycling Ltd

Hello Brian,

As per our discussed yesterday, I have looked up the various BAT Guidance Notes on the EPA website.

In particular I have reviewed the following;

- *Draft BAT Guidance Note on Best Available Techniques for Ferrous Metal Foundries. Draft September 2011.* This BAT on table 6.1 states an emission level for dust of 5-20mg/Nm<sup>3</sup>.
- *Draft BAT Guidance Note on Best Available Techniques for the Initial Melting and Production of Iron & Steel Sector, December 2009.* Table 6.1 itemises various emission levels for emissions to air, such as Total Particulates 5-10mg/Nm<sup>3</sup>, lead 0.5-2mg/Nm<sup>3</sup>, chromium 0.05mg/Nm<sup>3</sup> etc.
- *BAT Guidance Note on Best Available Techniques for Non-Ferrous Metals and Galvanising.* Table 6.1 itemises various emission levels for emissions to air, such as Total Particulates 10mg/Nm<sup>3</sup>, lead 0.5-2mg/Nm<sup>3</sup>, chromium 0.05mg/Nm<sup>3</sup> etc.
- *Final Draft BAT Guidance Note on Best Available Techniques for the Waste Sector: Waste Transfer and Materials Recovery.* There are no actual air emission levels referred to in this document with the exception of fugitive dusts.

I also have reviewed and noted a waste licence No: W0233-01 for a company called Techrec Ltd, Dublin. This past licence had had previously 2 emission points.

The **total particulates** levels were : **50mg/m<sup>3</sup>**, they also had the limits; chromium 1mg/m<sup>3</sup> and nickel 5mg/m<sup>3</sup>. This company operated as a WEEE processing waste management plant, which is very similar to KMK Metals present operations and activity.

In terms of KMK Metals facility, the emission from the stack point (treated Total Particulates) is projected from the manufacturers specifications of the plant as being <10mg/Nm<sup>3</sup>. The actual emissions monitoring event in December 2011 recorded 1.68mg/Nm<sup>3</sup> total particulates as discharged which is well below the BAT levels in bullet points above. Whilst the emission monitoring event in December was during a period of WEEE plant usage, the WEEE processing was not fully optimised and it is expected that the present stack emissions as discharged are higher than this measured value.

On balance, KMK Metals would therefore welcome air discharge emission limit values similar to competing licenses and competing activities such as the previous Techrec licence W0233-01.

It is therefore reasonable to contest that the actual emissions monitoring point is not major/significant and therefore KMK metals requests that the EPA permit and include this emission point in the existing Waste licence W0113-03 as part of a technical amendment process.

KMK Metals would welcome your comments on this and should you require any further information, please contact me.

Best Regards

Niall

Niall Nally | Senior Environmental Consultant

### ENVIROCO Management Ltd.,

Bow House, O'Moore St.,  
Tullamore, Co. Offaly.  
1890 522 000 (Lo Call)  
057 93 52342 (Fax)  
087 122 1422 (Mobile)  
[nnally@enviroco.ie](mailto:nnally@enviroco.ie)  
[www.enviroco.ie](http://www.enviroco.ie)