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Submission to the Director by  
Frank Clinton

Signed [Signature] Date 18/6/2012



OFFICE OF CLIMATE, LICENSING &  
RESOURCE USE

**ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM**

**TO:** DARA LYNOTT, DIRECTOR

**C.C:** Frank Clinton, Programme Manager

**FROM:** Brian Meaney, Senior Inspector

**DATE:** 18 June 2012

**RE:** Request for a Technical Amendment to  
Waste Licence Register Number **W0113-03** held by  
**KMK Metals Recycling Ltd**  
in relation to a recycling facility at Cappincur  
Industrial Estate, Daingean Road, Tullamore, Co.  
Offaly.

KMK Metals Recycling Ltd operates a transfer station and recycling facility in a small industrial estate on the outskirts of Tullamore. It is authorised to accept up to 20,000 tonnes per annum of hazardous and non-hazardous industrial waste and waste electrical and electronic equipment (WEEE). The facility was first licensed in December 2001. The licence was reviewed in April 2004 and April 2008.

**Details of request for technical amendment**

The licensee has requested amendment under Section 42B of the Waste Management Acts 1996 to 2011. The technical amendment relates to the installation of a minor emission point to facilitate the operation of a newly installed WEEE recycling plant at the facility. The licence is currently under review following KMK Metals' application for a review in October 2009. Following consultation with the planning authority, KMK Metals subsequently indicated its intention to apply for planning permission to provide for the proposed increase in waste acceptance. Pending completion of an environmental impact assessment, the Agency cannot proceed to consider granting a revised licence.

The new WEEE processing plant is currently operating under the existing licence, except for the presence of a new minor emission point installed to facilitate dust extraction from the WEEE processing equipment. Extracted air from a number of locations on the equipment is ducted through a bag filter before being emitted to atmosphere at the rear of the facility. The licensee had anticipated being granted a revised waste licence, with the dust emission point included, prior to commissioning of the new WEEE processing plant and

the associated bag filter (and emission point). This has not happened, and dust is now being emitted from an emission point not authorised under the existing licence.

A single monitoring event in December 2011 yielded a dust emission of 1.68 mg/Nm<sup>3</sup>.

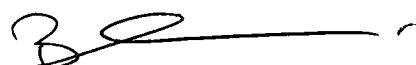
There is no BAT guidance covering dust emissions from activities of this nature. A 2007 licence granted to TechRec Ireland Ltd, latterly Immark Ireland Ltd (licence register number W0233-01, now surrendered) specified an emission limit value of 50mg/m<sup>3</sup> for a dust emission from similar processing plant, although using different abatement equipment. This limit value is taken to represent a major emission point. As a major emission point, it would not be appropriate to provide by technical amendment for a new emission point with an emission limit of this magnitude. However as a minor emission (measured at considerably less than 25% of the above limit, albeit only once), it is appropriate to consider providing for the emission point by technical amendment. It is proposed to include an emission limit value of 25% of the above limit (at 12.5mg/m<sup>3</sup>) with monthly monitoring for the first three months and quarterly thereafter.

It is not anticipated that a minor emission of this nature will cause environmental pollution or contravene any of the requirements of Section 40(4) of the Waste Management Acts 1996 to 2011. With the benefit of monthly monitoring for the next three months, and quarterly thereafter, the Agency will be in a position to further assess the emissions from the emission point as part of the ongoing licence review.

### **Recommendation**

To facilitate continued operation of the WEEE recycling facility, I recommend that the Agency agree to a technical amendment of licence register number W0113-03 under Section 42B(1)(c) of the Waste Management Acts 1996 to 2011.

Signed:



Brian Meaney