

ENVIRONMENTAL CONSULTANTS  
LoCall 1890 522 000

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

31<sup>st</sup> August 2012

**RE: KMK Metals Recycling Ltd. (KMK)**  
**Waste licence ref: W0113-04**

**Unsolicited additional information regarding; 1) Stack emissions monitoring and emission limit values, 2) Noise & Dust monitoring and 3) Waste water treatment system up-grade works to supplement waste licence review application ref: W0113-04.**

Dear Mr Meaney,

Further to the present waste licence review application as being determined by your office ref; W0113-04, KMK wishes to include the following information as important amendments to the application.

**(1) Stack emissions point; emission limit value & monitoring details.**

In relation to dusts/particulates generated inside the D-WEEE plant (building), these are exhausted to a duct/ventilation system, followed by the dust collection system (bag house type) for treatment with final discharge via emissions stack to atmosphere.

To date there have been three stack emissions monitoring events conducted by; Odour Monitoring Ireland Ltd, on 2<sup>nd</sup> December 2011 and by Glenside Environmental



Services on 24<sup>th</sup> May and 20<sup>th</sup> July 2012. All monitoring reports are contained in Appendix 1 attached to this submission.

The WEEE processing plant was in use during monitoring, and the samples were taken as discharged from the emission stack after treatment.

The actual measured emissions for each monitoring event are summarised and tabulated below in tables 1, 2 and 3.

In summary the actual measured total particulate matter during the first monitoring event was 1.68 (mg/Nm<sup>3</sup>), was 1.82 (mg/Nm<sup>3</sup>) for the second monitoring event and was 0.21 (mg/Nm<sup>3</sup>) for the third monitoring event. All monitoring occurred during typical working conditions at KMK.

**Table 1: Summary of Air Emissions stack monitoring event on 2<sup>nd</sup> December 2011.**

Emission points identity	Parameter	Periodic monitoring result	Expanded uncertainty (%)
Dust filtration plant – exhaust stack	Volume flow (Nm <sup>3</sup> /hr dry gas)	29,197	-
	Cadmium and Thallium (mg / Nm <sup>3</sup> dry gas)	<0.00052	<1.0
	Mercury (mg / Nm <sup>3</sup> dry gas)	0.000015	<1.0
	Lead (mg / Nm <sup>3</sup> dry gas)	0.00512	<1.0
	Chromium (mg / Nm <sup>3</sup> dry gas)	0.0392	<1.0
	Total particulate matter (mg/Nm <sup>3</sup> dry gas)	1.68	<2.0

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**Table 2: Summary of Air Emissions stack monitoring event on 24<sup>th</sup> May 2012.**

Emission points identity	Parameter	Periodic monitoring result	Expanded uncertainty (%)
Dust filtration plant – exhaust stack	Volume flow (Nm <sup>3</sup> /hr dry gas)	16,362	-
	Cadmium and Thallium (mg / Nm <sup>3</sup> dry gas)	<0.0018	n/a
	Mercury (mg / Nm <sup>3</sup> dry gas)	<0.0008	n/a
	Lead (mg / Nm <sup>3</sup> dry gas)	0.0059	n/a
	Chromium (mg / Nm <sup>3</sup> dry gas)	0.0048	n/a
	Total particulate matter (mg/Nm <sup>3</sup> dry gas)	1.82	0.06

**Table 3: Summary of Air Emissions stack monitoring event on 20<sup>th</sup> July 2012.**

Emission points identity	Parameter	Periodic monitoring result	uncertainty (mg / Nm <sup>3</sup> )
Dust filtration plant – exhaust stack	Moist flow rate at STP (Nm <sup>3</sup> /hr)	19,682.58	-
	Cadmium and Thallium (mg / Nm <sup>3</sup> dry gas)	0.0518	N/A
	Mercury (mg / Nm <sup>3</sup> dry gas)	0.0094	N/A
	Lead (mg / Nm <sup>3</sup> dry gas)	0.0392	N/A
	Chromium (mg / Nm <sup>3</sup> dry gas)	0.2902	
	Total particulate matter (mg/Nm <sup>3</sup> dry gas)	0.21	0.01

KMK has reviewed the present licence limit of 12.5mg/m<sup>3</sup> for this emission point ref: A2-8 as per the technical amendment recently granted on 25<sup>th</sup> June 2012 and wishes to amend the waste licence application with the following proposed Schedule B and C replacement tables;

### Schedule B

Parameter	Emission Limit Value
Total particulates	20 mg/m <sup>3</sup>

### Schedule C.1.2

Parameter	Monitoring frequency	Analysis Method/Technique
Total particulates	Annually	Standard sampling and laboratory analysis methods
Metals species (Al, As, Cd, Cr, Cu, Fe, Hg, Ni, Pb and Zn)		

As a justification to this proposal, please note the air emissions stack assessments were conducted over three separate monitoring events, approximately 6 months and 2 months apart. Given the start-up and commissioning phase of the WEEE separation process at all times of monitoring, KMK contests that a maximum limit of 20mg/Nm<sup>3</sup> for total particulates be strongly considered as the new license limit.

This limit will accommodate any additional treated dust emissions that may arise during periods of prolonged and/or repeat WEEE separations within the building.

It is proposed to conduct annual stack air emissions monitoring (i.e. total particulates and metals constituents) for future operations at the site in combination with a continuous particulates monitoring probe installed on the emissions stack. This probe device, effectively operates as a bag breach detector whereby any potential breach or problem on the filter bag possibly resulting in abnormal emissions from the stack will be automatically detected by the probe and resulting in an audible warning alerting management and operatives to the situation. This probe was sourced and fitted directly to the stack by the providers of the WEEE treatment equipment and will provide a real time detection should any abnormal emissions occur on the stack. Hence there will be no incidents of significant or abnormal continual emissions from the stack as KMK will be aware of these events should they occur immediately and therefore will rectify any plant defect or issue as a matter of urgency.

Finally, for comparison purposes, the following information is brought to the attention of the Agency;

- *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.
  - A previous waste licence No: W0233-01 for a company called Techrec Ltd, Dublin had 2 emission points whereby 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 present operations and activity.

Hence, the proposed maximum limit of 20mg/Nm<sup>3</sup> for total particulates with annual monitoring is considered appropriate and reasonable for the site operations given the plant and equipment installed on-site, continuous monitoring system and scale of activities.

#### **Additional new air emissions point**

In order to prepare for possible future operations at the site, KMK wishes to have an option available to install an air emission point at a location on E building. This emissions point will service a WEEE processing operation inside E building whereby the extracted air will be treated by a bag filter unit and the treated air will be discharged to atmosphere. The significance of emission will be lower than emission point A2-8. The exact nature and details of emission are not available at present but will be confirmed to the Agency at a later date on receipt of the waste licence and may be conditional within the same licence.

#### **2) Ambient Noise & Dust monitoring – locations**

In relation to compliance noise monitoring on-site, I refer to the attached letter sent to the enforcement section of the Agency on the 17<sup>th</sup> July and the corresponding acceptance letter from the Agency dated 7<sup>th</sup> August on same (Appendix 2). Therefore KMK formally requests the new noise monitoring locations of the waste licence review to reflect this information.

In relation to ambient dust monitoring at the site, it is now also proposed to modify the monitoring locations to reflect the overall new site design. Therefore it is now proposed to monitor ambient dust at 4 locations on-site reflecting the four site boundaries in all directions north, south, west and east.

### 3) Waste water treatment system up-grade works proposal

KMK has appraised their existing waste water treatment system (WWTS) and explored various options in order to improve the facilities on-site and at the same time comply with present guidelines on waste water treatment.

Therefore, a full proposal was prepared in July 2012 and was submitted to the Environment & Water Services section of Offaly County Council for their consideration prior to inclusion with a Planning Application proposed over the next couple of weeks. This full proposal titled 'Drain Impact and Assimilative Report based on a Proposed Waste Water Treatment System (WWTS)' is attached as Appendix 3 and was deemed appropriate and to the satisfaction of the environment section. The up-grade works to the WWTS will involve the following key improvements;

- The existing Biocycle treatment tank will be modified for use as a primary holding chamber for domestic effluent storage and settlement.
- A new tank will be installed to be used as a buffering and reaction tank called a Sequencing Batch Reactor (SBR) including dosing for ortho-phosphate and total nitrogen removal. This secondary treatment process is designed to reduce BOD, COD, solids, phosphates and ammonia over an 8, 10 or 12 hour batch cycle and thus prepare the effluent for sand filter treatment.
- The sand filter is a biological treatment process designed to further reduce the parameter loadings and ensure the final discharged effluent is acceptable for surface water assimilation in the land drain. There will be a sampling chamber located immediately downstream of the sand filter. The impact from the proposed discharge at point F (on-site WWTS source) will be acceptable to the land drain on the basis of the parametric values given for the output of the sand filter (5/1/1) for BOD/phosphates/ammonia respectively, the low volumes to be discharged from the system and the relative quality of the land drain up-stream of the proposed discharge point to effectively assimilate the loadings from KMK.

The report in Appendix 3 also concludes the following remarks regarding the impact to the land drain and indirectly the Tullamore River;

- All domestic and associated effluent from the proposed up-graded WWTS is effectively treated by a primary, secondary and final biological process prior to entry to the land drain.
- There will be a sampling chamber installed on the final outfall from the sand filter unit for sampling of treated effluent quality prior to linking with the roof water discharge pipe from D-Hanger building. This sampling point will provide monitoring of the discharge prior to dilution with rainwater during wet weather. The true dilution effect of the effluent discharge can be determined by sampling of the discharge pipe at the land drain during wet weather for comparison purposes.
- There are no chemicals or other substances entering the WWTS and therefore precluded from entering the land drain.
- The receiving land drain flows through a myriad of other land drains prior to entry to the Tullamore River. This network of land drains will assist greatly in assimilation of the organic and other parameters prior to entry to the river.

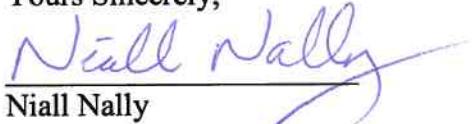
The proposed increase of waste acceptance tonnage and future operations at the KMK site will not affect the population usage of the WWTS and will not impact on its treatment capability.

As part of future developments, should foul sewer infrastructure be made available by Offaly County Council for occupiers of Cappincur Industrial Estate, KMK will assess their waste water system needs with the possibility to apply for connection to the foul sewer network and thereby ceasing their discharge to land drain.

A revised A3 size map ref: Map F.1.1b Environmental Monitoring Locations is also attached for inclusion with the review application submission.

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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# **Appendix 1**

## **Stack Emissions Monitoring reports**

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**AIR EMISSION TESTING OF STACK EMISSIONS FROM KMK METALS RECYCLING LTD,  
CAPPINCUR INDUSTRIAL ESTATE, DAINGEAN RD, TULLAMORE, CO. OFFALY.**

PREFORMED BY ODOUR MONITORING IRELAND ON BEHALF OF ENVIROCS MANAGEMENT LTD.

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PREPARED BY:	Dr. Brian Sheridan
ATTENTION:	Mr. Niall Nally
LICENCE NUMBER:	WO113-03
LICENCE HOLDER:	KMK Metals Recycling Ltd
FACILITY NAME:	KMK Metals Recycling Ltd
DATE OF MONITORING VISIT:	02 <sup>nd</sup> December 2011
NAME AND ADDRESS OF CLIENT ORGANISATION:	KMK Metals Recycling Ltd, Cappincur Industrial Estate, Daingean Rd, Tullamore, Co. Offaly
NAME AND ADDRESS OF MONITORING ORGANISATION:	Odour Monitoring Ireland, Unit 32 DeGranville Court, Dublin Road, Trim, Co. Meath
DATE OF REPORTING:	13 <sup>th</sup> Jan 2012 (ver.1) & 04 <sup>th</sup> Feb 2012 (ver.2)
NAME AND THE FUNCTION OF THE PERSON APPROVING THE REPORT:	Dr. Brian Sheridan, Managing Partner, Odour Monitoring Ireland
REPORT NUMBER:	201245(2)
REVIEWERS:	Mr. Niall Nally

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## Document Amendment Record

**Client:** KMK Metals Recycling Ltd.

**Title:** Air emission testing of stack emissions from KMK Metals Recycling Ltd, Cappincur Industrial Estate, Daingean rd, Tullamore, Co. Offaly.

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<b>Project Number:</b> 201245(2)			<b>Document reference:</b> Air emission testing of stack emissions from KMK Metals Recycling Ltd, Cappincur Industrial Estate, Daingean rd, Tullamore, Co. Offaly		
201245(1)	Document for review	B.A.S.	JWC	B.A.S	13/01/2012
201245(2)	Minor Amendments	B.A.S.	JWC	B.A.S	04/02/2012
Revision	Purpose/Description	Originated	Checked	Authorised	Date



## Signing sheet

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Brian Sheridan Ph.D Eng

For and on behalf of Odour Monitoring Ireland

## Executive summary

Odour Monitoring Ireland was commissioned by KMK Metals Recycling Ltd to perform an air emission test of their dust filtration system on the 02<sup>nd</sup> December 2011.

Monitoring was performed for Airflow rate, Total particulates, Moisture content and speciated metals (Particulate bound and gaseous based Metals). Particular reference was given to standard methodologies including EN13284-1, EN14385, EN13211 and EN14790.

A summary of the results are presented below.

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Emission points identity	Parameter	Monitoring period and date	Periodic monitoring result	Expanded uncertainty (%)	Emission limit value	Status
Dust filtration plant – Exhaust stack	Volume flow (Nm <sup>3</sup> /hr dry gas)	02 <sup>nd</sup> Dec 2011 – 11.50AM to 12.10 PM	29,197	--	--	--
	Cd and Tl (mg/Nm <sup>3</sup> dry gas)	02 <sup>nd</sup> Dec 2011 – 13.20PM to 15.30 PM	<0.00052	<1.0	--	--
	Mercury (mg/Nm <sup>3</sup> dry gas)	02 <sup>nd</sup> Dec 2011 – 13.20PM to 15.30 PM	<0.000015	<1.0	--	--
	Lead (mg/Nm <sup>3</sup> dry gas)	02 <sup>nd</sup> Dec 2011 – 13.20PM to 15.30 PM	0.00512	<1.0	--	--
	Chromium (mg/Nm <sup>3</sup> dry gas)	02 <sup>nd</sup> Dec 2011 – 13.20PM to 15.30 PM	0.0392	<1.0	--	--
	Remaining metals (mg/Nm <sup>3</sup> , dry gas)	02 <sup>nd</sup> Dec 2011 – 13.20PM to 15.30 PM	<0.00182	<1.0	--	--
	Total particulate matter (mg/Nm <sup>3</sup> dry gas)	02 <sup>nd</sup> Dec 2011 – 13.20PM to 15.30 PM	1.68	<2.0	--	--

*Comment: Fugitive emission inspection purposes only.*

## 1. Introduction

Odour Monitoring Ireland was requested by KMK Metals Recycling Ltd to perform air emission testing of their dust filtration emission points in accordance with standard European methods. The parameters listed in *Table 1.1* were monitored using the appropriate instrumentation as illustrated in *Table 1.1*.

**Table 1.1.** Monitored parameters and techniques for dust filtration emission point in KMK Metals Recycling Ltd.

Sample location	Parameter	AG2 Compliant	SOP	Analytical method
Exhaust dust filtration plant	Volumetric Flow Rate and temperature	Yes	2000	Pilot tube method and temperature probe- EN13284-1:2002
Exhaust dust filtration plant	Speciated Metals	Yes	2027	TCR Tecora automatic Total particulate sampling train and heated probes / impinger set-EN14385
Exhaust dust filtration plant	Mercury	Yes	2028	TCR Tecora automatic Total particulate sampling train and heated probes / impinger set-EN13211
Exhaust dust filtration plant	Water vapour	Yes	2017	Impingement – Gravimetric weight gain - EN14790:2005
Exhaust dust filtration plant	Total Particulates	Yes	2002	TCR Tecora automatic Total particulate sampling train and associated probes- EN13284-1:2002

This report presents details of this monitoring programme. This environmental monitoring was carried out by Dr. Brian Sheridan and Dr. John Casey, Odour Monitoring Ireland on the 02<sup>nd</sup> December 2011. Methodology, Results, Discussion, Conclusions and calculations are presented herein.

### 1.1 Plant details

The following surface plant details were noted during the study.

Company:	KMK Metals Recycling Ltd
Site:	KMK Metals Recycling Ltd
Stack:	Exhaust dust filtration plant
Sampling date:	02 <sup>nd</sup> December 2011
Time sampling started:	11.50 AM
Time sampling ended:	15.30 PM
Licence Number:	WO113-03
Fuel type:	N/A
Plume appearance:	Not visible
Process:	Dust filtration from WEEE recycling / separation

## 1.2 Special Monitoring Requirements

There were no special monitoring requirements for this campaign.

## 1.3 Summary of methods

The summaries of methods are contained in *Table 1.1*.

Substance	Standard Method	Limit of Detection	Calculation Spreadsheet
Metals	EN 14385	<0.005 mg/m <sup>3</sup>	6018
Mercury	EN 13211	<0.001 mg/m <sup>3</sup>	6020
Flow Rates	EN 13284-1	0.80 m/s	6011

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## 2. Monitoring Results

This section describes the results obtained through the study period.

### 2.1 Volumetric flow rate, temperature and stack static pressure

Sampling for airflow rate was performed in accordance with EN13284-1:2002. *Table 2.1* summarises the flow measurements from the stack and includes the stack velocity, expressed in metres per second ( $m\ s^{-1}$ ) and volumetric airflow rates expressed in  $m^3\ hr^{-1}$  at both actual and standard reference conditions of 273.15 K, 101.3 kPa (i.e. normalised temperature and pressure) on a dry gas basis.

**Table 2.1.** Volumetric airflow rate results for exhaust emission point from dust filter located in KMK Metals Recycling Ltd.

Stack Reference	Results Dust plant exhaust emission point
Stack diameter (m)	0.80
Average temperature (K)	286
Average airflow rate (m/s)	17.68
Area ( $m^2$ )	0.50272
Atmospheric pressure (kPa)	99.55
Average static pressure (kPa)	0.021
Standard barometric pressure (kPa)	101.30
Actual volumetric airflow rate ( $Am^3/hr$ )	31,997
Normalised volumetric airflow ( $Nm^3/hr$ ) <sup>1</sup>	30,038
Moisture content (%)	2.80
Oxygen %	20.90
Normalised volumetric airflow rate dry ( $Nm^3/hr$ )	29,197
Limit value	--
Maximum pressure recorded (Pa)	255
Minimum pressure recorded (Pa)	218
Ratio b/n max and min pressure	1.169
Angle of swirl (deg) ( must be less than <15)	2
Did measurement location comply with standard.	No (one port, doubled up on sampling across one plane)
Leak check pass on pitot	Yes
Dynamic pressure	>5Pa

**Notes:** <sup>1</sup> denotes normalised to 273.15 Kelvin and 101.3 kPa, with no correction for moisture content.

## 2.2 Results for Total particulates and metals species concentration

Flue gas analysis was performed on the exhaust emission points located on the dust filtration equipment. Total particulates and metals sampling and analysis was performed using a TCR Automatic Iso stack plus sampling train with heated probe and impinger train. The results of the testing are presented in *Table 2.2.*

Stack based concentrations have been presented at standard reference conditions of 273.15 K and 101.3 kPa, dry gas.

For Total particulates and metals sampling monitoring, the average DI% for monitoring of:

Emission point dust filtration plant was -0.21%,

This value were inside the lower and upper limit value of -ive 5% to +ive 15% in order to comply with reference standard EN13284-1:2002.

Sampling for Total particulates and Metals was performed on one sample plane. Sample points were doubled up on this single plane.

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**Table 2.2. Stack concentrations and emission value results from emission point dust filtration plant.**

Substance to be Monitored	Emission Limit Value (see Table 7 TALuft) (kg/hr)	Periodic Monitoring Result (mg/Nm <sup>3</sup> , dry gas)	Emission Point Reference: Dust filtration plant			Sampling Start/End Times	Method Reference	Operating Status
			Units Reference Conditions 273 K, 101.3 kPa, dry gas	Uncertainty Of Measurement +/-	Stack Flow Rate (Nm <sup>3</sup> /hr dry gas)			
Particulate matter		1.68	mg/Nm <sup>3</sup>	<2%	29,197	-	02/12/11 11.50AM to 15.30PM	EN13284-1
Cadmium	0.0025	<0.00026	mg/Nm <sup>3</sup>	<1%				
Thallium	0.0025	<0.00026	mg/Nm <sup>3</sup>	<1%				
Total	--	--	mg/Nm <sup>3</sup>	<1%				
Mercury	0.0025	<0.000015	mg/Nm <sup>3</sup>	<1%				EN 13211
Antimony	--	<0.00026	mg/Nm <sup>3</sup>	<1%				
Arsenic	0.0025	<0.00026	mg/Nm <sup>3</sup>	<1%				
Lead	0.025	<b>0.00512</b>	mg/Nm <sup>3</sup>	<1%				
Chromium	--	<b>0.0392</b>	mg/Nm <sup>3</sup>	<1%				
Cobalt	--	<0.00026	mg/Nm <sup>3</sup>	<1%				
Copper	--	<0.00026	mg/Nm <sup>3</sup>	<1%				
Manganese	--	<0.00026	mg/Nm <sup>3</sup>	<1%				
Nickel	0.025	<0.00026	mg/Nm <sup>3</sup>	<1%				
Vanadium	--	<0.00026	mg/Nm <sup>3</sup>	<1%				
Total	--	--	mg/Nm <sup>3</sup>	<1%				

#### Additional Information

Metals were tested by ICP-MS - Analysis was carried out in accredited laboratories.

The pre and post leak check were within the requirements of BS EN 13284-1 (Start – 100cc/min; End – 110 cc/min at 62 kPa).

Isokinetic conditions were -0.21% for the test

Number of ports = 1

Straight length before sample point = <5 –not in compliance

Straight length after sample point = >2 – in compliance

Sample blank = < 0.80% which is <10% ELV – Compliant

Pitot leak check = OK

Angle of Flow with regard to duct axis: <15 degrees

Differential pressure at pitot tube: >5Pa

Ratio of maximum to minimum velocity: <3:1

There was no negative flow in the stack

Moisture content of the gas: 2.80%

The temperature of stack gas was: 13 degrees C

Values in bold are the only detectable metals/dust in the air stream.

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#### 4. Appendix I - Sampling and analysis details

##### A.4.1 Location of Sampling

KMK Metals Recycling Ltd.

##### A.4.2 Date & Time of Sampling

02<sup>nd</sup> December 2011

##### A.4.3 Personnel Present During Sampling

Dr. John Casey, and Dr. Brian Sheridan Odour Monitoring Ireland, Trim, Co. Meath. MCERT Level 1 MM06743 and MM0674.

##### A.4.4 Instrumentation

S type pitot (OMI08) and PT100 thermocouple (OMI02);  
Testo 400 handheld (OMI11) and appropriate probes.

Automatic ISOSTACK Plus TCR Tecora particulates sampling train (OMI 13).  
Impinger train (OMI 14) and heated probe (OMI 09).

##### A.4.5 Standards

EN13284-1:2002

MID 13284-1, MCERTS Documentation, [www.s-t-a.org](http://www.s-t-a.org).

EN14385

EN14790:2005

EN13211

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## 6. Appendix II - Quality assurance checklist

### Velocity measurements:

Were water droplets present?	No
Direction of gas flow within $\pm 15^{\circ}$ of stack axis	Yes
Absence of swirling flow	Yes
Dynamic pressure > 5 Pa at all sampling points	Yes
Ratio of the highest to lowest dynamic pressure < 9:1.	Yes

### Sampling:

Sampling plane was correctly positioned	Yes
Area of sampling apparatus was < 10% of stack area	Yes
Sampling was from centres of equal areas	Yes
Sampling at each point not less than 3 minutes	Yes
Nozzle was facing directly upstream to within $\pm 10^{\circ}$	Yes
Leak check performed before and after each run and passed	Yes

### Sampling handling:

Minimum weight of sample collected > 0.30% of filter weights	Yes
Samples achieved stable weight	Yes
Particulate samples sent for analysis	Yes

### QA procedure:

Isokinetic data sheet completed and signed off	Yes
Report saved electronically to server	Yes
Raw data and hard copy of report filed together	Yes

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Company Name: KMK Metals Recycling Ltd.  
Waste Licence No: W0113-03  
Year: 2012, Visit No: 1  
Report No: 012-050



### DOCUMENT AUTHORISATION

Glenside Report Reference	012-050
Client:	KMK Metals
EPA IPPC Licence REF:	W0113-03
Site Address:	Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly
Document Title:	Stack Emissions Monitoring Report
Date of Survey:	24 <sup>th</sup> May 2012
Document prepared by:	Glenside Environmental, Unit 7, Westpoint Buildings, Ballincollig, Cork

Preparation and technical review (including design review for design work) carried out by: Patrick O'Brien MCERTS Level II. Sampling carried out by Patrick Power & Ewa Piatek

Position/Discipline	Name	Signed	Date
Risk Assessor	Patrick Power		14/06/2012

Issue for Review to Client: Mr. Niall Nally, Enviroco on 15<sup>th</sup> June 2012.

This document has been produced and checked in accordance with the requirements of the Glenside Environmental Quality Management System and is duly authorised for issue.			
Position/Discipline	Name	Signed	Date

Quality Manager	Patrick O' Brien	P. O' Brien	14/06/2012
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Company Name: KMK Metals Recycling Ltd.  
Waste Licence No: W0113-03  
Year: 2012, Visit No: 1  
Report No: 012-050

---

**Report Summary:**

**Job Quotation No:** n/a  
**Operator Licence No:** W0113-03  
**Operator Name:** KMK Metals Recycling Ltd.  
**Installation:** Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly  
**Contact Name:** Mr. Niall Nally

**Monitoring dates** 24/05/2012

**Phone No:** 087/1221422

**Monitoring Organisation:** Glenside Environmental Unit 7, Westpoint Buildings Link Road Ballincollig Cork

**Phone No:** (021) 4810016

**Email:** info@glenenv.ie

**Report Date:** 15/06/2012

**Report written by:** Ewa Platek  
**MCERTS reg No:** MM07 799  
**Competency:** Level 1  
**Function:** Technician  
**Endorsements:** TE1, TE2, TE3, TE4

**Signed:**

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**Report approved by:** Patrick O'Brien  
**MCERTS reg No:** MM08 992  
**Competency:** Level 2  
**Function:** Team Leader  
**Endorsements:** TE1, TE2, TE3, TE4  
**Signed:**

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## 1. Introduction

Glenside Environmental was commissioned by KMK Metals Recycling Ltd to perform air emission monitoring at the facility in Cappincur Industrial Estate, Dalngean Road, Tullamore, Co. Offaly. The monitoring was carried out as required by company representative Mr. Niall Nally from Enviroco Environmental Consultants. This report presents details of this monitoring programme.

## 2. Objectives

### 2.1. Substances to be monitored at each emission point

Sample Locations	Parameter
Dust Filtration Plant – Exhaust Stack	Particulates Run 1
	Particulates Run 2
	Particulates Run 3
	Metals (Total of Cd+Tl)
	Metals (Total of Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V, Be)
	Mercury

### 2.2. Special Requirements

There were no special requirements for this monitoring campaign.

### 3. Monitoring Results

Tables 3.1 presents the results of the air emission monitoring sampling program carried out at the emission stacks listed below.

#### 3.1. Monitoring Results at Dust Filtration Plant Exhaust Stack

Substances	Emission Limit Value	LOD	Results mg/Nm <sup>3</sup>	Uncertainty %	Start -End
Particulates Run 1	n/a	0.17	0.98	0.03	10:06-10:36
Particulates Run 2	n/a	0.31	1.82	0.06	10:55-11:25
Particulates Run 3	n/a	0.32	0.41	0.01	11:34-12:04
Particulates	n/a	0.32	0.75	0.02	09:35-09:41
Metals (Total of Cd+Tl)	n/a	0.0018	<0.0018	n/a	12:23-12:53
Chromium	n/a	0.0030	0.0048	n/a	12:23-12:53
Lead	n/a	0.0009	0.0059	n/a	12:23-12:53
Metals (Total of Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V, Be)	n/a	0.0175	0.0277	n/a	12:23-12:53
Mercury	n/a	0.0008	<0.0008	n/a	13:09-13:39

### 3.2. Reference Conditions

Emission Point	Reference Temperature	Reference Pressure	Reference Moisture	Reference Oxygen
Dust Filtration Plant – Exhaust Stack	273 K	101.3 kPa	No correction	No correction

### 3.3. Methods and Accreditation Status

Emission Point	Substances	Method	SOP Number	Accreditation Status	Analysis Laboratories	Accreditation Status
Dust Filtration Plant – Exhaust Stack	Particulates	BS EN 13284-2002	GEN3-001	n/a	SAL Laboratories Manchester	UKAS
Dust Filtration Plant – Exhaust Stack	Metals	BS EN 14385:2004	GEN3-014	n/a	SAL Laboratories Manchester	UKAS

### 4. Operating Information

Process Status Load /Feedstock	Process Details	Fuel /Feedstock	Abatement System	Status of Abatement System
Normal Operation	Continuous	1/3 of Load	Dust Filter	In Operation
Normal Operation	Continuous	Full Load	Dust Filter	In Operation

## 5. Monitoring Deviation

Requirements	Comments
Substances were monitored as per monitoring objectives	Yes
Substances were monitored in accordance with the monitoring stated in AG2 (Air Emissions Monitoring Guidance Note#2)	Yes
All monitoring substances were carried out as per Standard/Methods requirements.	Yes

## Sampling Location Summary

Requirements	Comments
Stack Shape	Circular
Dimensions	0.8
Recommended 5 hydraulic diameters straight length before sampling plane	Yes
Recommended 2 hydraulic diameters straight length after sampling plane	No
Sufficient ports number Small stacks – 1 port <1.5m – 2 ports >1.5m – 4 ports	1 port
Appropriate port size	Yes
Suitable working platform	Yes
Safe and clean working environment	Yes

Company Name: KMK Metals Recycling Ltd.

Waste Licence No: W0113-03

Year: 2012, Visit No: 1

Report No: 012-050

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## 6. Annex 1

### 6.1. Personnel

Scientist/Technician Name	Position	Qualification	Technical Endorsements	MCERTS Number
Ewa Piatek	Technician	Level 1	TE1, TE2, TE3, TE4	MM07 799
Patrick Power	Technician	Trainee	-	MM12 1183

### 6.2. Equipment used

Equipment
TCR Tecora
Probe
Impinger Set

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Company Name: KMK Metals Recycling Ltd.

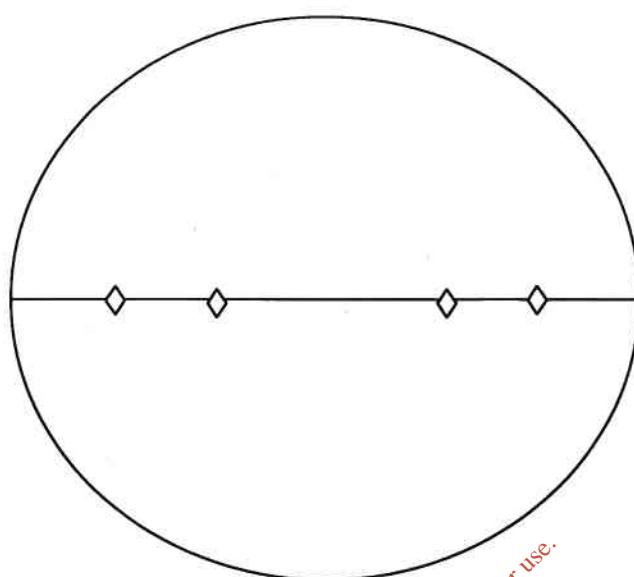
Waste Licence No: W0113-03

Year: 2012, Visit No: 1

Report No: 012-050

## 7. Annex 2

### 7.1. Diagrams of the stack indicating Probe Positions



### 7.2. Sampling measurements

Determinant	Result	Units
Number of Ports Sampled	2	-
Number of Points Sampled	16	-
Average Velocity v'a	9.04	m/s
Average Pressure	100.3	kPa
Average Temperature	25.73	°C
Stack Diameter	0.8	m
Actual Moist Flow Rate	16362.02	m <sup>3</sup> /Hr
Moist Flow Rate at STP	14805.33	m <sup>3</sup> /Hr
Dry Flow Rate at STP	14760.91	m <sup>3</sup> /Hr
T Reference	273	Deg K
P Reference	101.3	kPa
Isokinetic condition	Run 1 -1.73 Run 2 1.44 Run 3 2.11 Metals -1.59 Mercury -1.01	%
Oxygen	n/a	%
Water vapour	0.3	%

Company Name: KMK Metals Recycling Ltd.

Waste Licence No: W0113-03

Year: 2012, Visit No: 1

Report No: 012-050

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## 8. Annex 3

### 8.1. Results and uncertainty calculations, certificates of analysis

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# Scientific Analysis Laboratories Ltd

## Certificate of Analysis

Hadfield House  
Hadfield Street  
Cornbrook  
Manchester  
M16 9FE  
Tel : 0161 874 2400  
Fax : 0161 874 2404

**Report Number:** 280936-1

**Date of Report:** 08-Jun-2012

**Customer:** Glenside Environmental  
Unit 7  
Westpoint Buildings  
Ballincollig.  
CO. CORK, VAT REG 9683448N

**Customer Contact:** Mr Patrick Power

**Customer Job Reference:** KMK METALS

**Customer Purchase Order:** 012-050 KMK

**Date Job Received at SAL:** 29-May-2012

**Date Analysis Started:** 30-May-2012

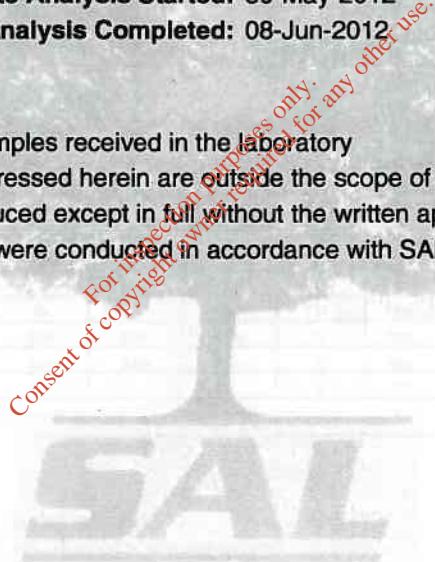
**Date Analysis Completed:** 08-Jun-2012

The results reported relate to samples received in the laboratory

Opinions and interpretations expressed herein are outside the scope of UKAS accreditation

This report should not be reproduced except in full without the written approval of the laboratory

Tests covered by this certificate were conducted in accordance with SAL SOPs



Report checked  
and authorised by :  
Jennifer Wraith  
Customer Services Manager

Issued by :  
Jennifer Wraith  
Customer Services Manager

SAL Reference:	280936
Customer Reference:	KMK METALS
Probe Wash (27.5%HNO3)	Analysed as Probe Wash (27.5%HNO3)
BS EN 14385 Metals Suite	

		SAL Reference	280936 013	280936 014
		Customer Sample Reference	050-13	050-14
		Test Sample	AR	AR
Determinand	Method	LOD	Units	Symbol
Antimony	ICPMS (HF BS EN 14385)	1	µg	U
Arsenic	ICPMS (HF BS EN 14385)	0.5	µg	U
Beryllium	ICPMS (HF BS EN 14385)	0.5	µg	U
Cadmium	ICPMS (HF BS EN 14385)	0.5	µg	U
Chromium	ICPMS (HF BS EN 14385)	2	µg	U
Cobalt	ICPMS (HF BS EN 14385)	0.5	µg	U
Copper	ICPMS (HF BS EN 14385)	0.5	µg	U
Lead	ICPMS (HF BS EN 14385)	0.5	µg	U
Manganese	ICPMS (HF BS EN 14385)	2	µg	U
Nickel	ICPMS (HF BS EN 14385)	2	µg	U
Thallium	ICPMS (HF BS EN 14385)	0.5	µg	U
Vanadium	ICPMS (HF BS EN 14385)	0.5	µg	U

SAL Reference:	280936					
Customer Reference:	KMK METALS					
Impinger (5%HNO3/5%H2O2)	Analysed as Impinger (3.3%HNO3/1.5%H2O2)					
BS EN 14385 Metals Suite						
		SAL Reference	280936 009	280936 010	280936 011	280936 012
		Customer Sample Reference	050-09	050-10	050-11	050-12
		Test Sample	AR	AR	AR	AR
Determinand	Method	LOD	Units	Symbol		
Antimony	ICPMS (BS EN 14385)	0.5	µg/l	U	<0.5	<0.5
Arsenic	ICPMS (BS EN 14385)	0.2	µg/l	U	<0.2	<0.2
Beryllium	ICPMS (BS EN 14385)	0.5	µg/l	U	<0.5	<0.5
Cadmium	ICPMS (BS EN 14385)	0.5	µg/l	U	<0.5	<0.5
Chromium	ICPMS (BS EN 14385)	0.5	µg/l	U	<0.5	0.8
Cobalt	ICPMS (BS EN 14385)	0.2	µg/l	U	<0.2	1.2
Copper	ICPMS (BS EN 14385)	1	µg/l	U	<1	<1
Lead	ICPMS (BS EN 14385)	0.3	µg/l	U	3.0	4.1
Manganese	ICPMS (BS EN 14385)	2	µg/l	U	3	<2
Nickel	ICPMS (BS EN 14385)	2	µg/l	U	<2	3
Thallium	ICPMS (BS EN 14385)	0.3	µg/l	U	<0.3	<0.3
Vanadium	ICPMS (BS EN 14385)	0.3	µg/l	U	<0.3	<0.3
Volume	ICPMS (BS EN 14385)	1	ml	U	-	-

SAL Reference:	280936			
Customer Reference:	KMK METALS			
Filter	Analysed as Filter			
BS EN 14385 Metals Suite				
		SAL Reference	280936 015	280936 016
		Customer Sample Reference	050-15	050-16
		Test Sample	AR	AR
Determinand	Method	LOD	Units	Symbol
Antimony	ICPMS (HF BS EN 14385)	0.05	µg	U
Arsenic	ICPMS (HF BS EN 14385)	0.05	µg	U
Beryllium	ICPMS (HF BS EN 14385)	0.05	µg	U
Cadmium	ICPMS (HF BS EN 14385)	0.05	µg	U
Chromium	ICPMS (HF BS EN 14385)	0.05	µg	U
Cobalt	ICPMS (HF BS EN 14385)	0.05	µg	U
Copper	ICPMS (HF BS EN 14385)	0.05	µg	U
Lead	ICPMS (HF BS EN 14385)	0.05	µg	U
Manganese	ICPMS (HF BS EN 14385)	0.05	µg	U
Nickel	ICPMS (HF BS EN 14385)	0.05	µg	U
Thallium	ICPMS (HF BS EN 14385)	0.05	µg	U
Vanadium	ICPMS (HF BS EN 14385)	0.05	µg	U

SAL Reference:	280936				
Customer Reference:	KMK METALS				
Probe Wash (27.5%HNO3)	Analysed as Probe Wash (27.5%HNO3)				
Miscellaneous					
	SAL Reference 280936 020				
	Customer Sample Reference 050-20				
	Test Sample AR				
Determinand	Method	LOD	Units	Symbol	
Mercury	CVAFS (HF Digest BS EN 13211)	0.01	µg	U	(13) <0.01

SAL Reference:	280936				
Customer Reference:	KMK METALS				
Impinger (2%KMnO4/10%H2SO4)	Analysed as Impinger (2%KMnO4/10%H2SO4)				
Miscellaneous					
	SAL Reference 280936 017 280936 018 280936 019				
	Customer Sample Reference 050-17 050-18 050-19				
	Test Sample AR AR AR				
Determinand	Method	LOD	Units	Symbol	
Mercury	CVAFS (BS EN 13211)	5	µg/l	U	<5 <5 <5

SAL Reference:	280936				
Customer Reference:	KMK METALS				
Filter	Analysed as Filter				
Miscellaneous					
	SAL Reference 280936 021				
	Customer Sample Reference 050-21				
	Test Sample AR				
Determinand	Method	LOD	Units	Symbol	
Mercury	CVAFS (HF Digest BS EN 13211)	0.01	µg	U	(13) <0.01

SAL Reference:	280936				
Customer Reference:	KMK METALS				
Wash(DI)	Analysed as Wash(DI)				
Miscellaneous					
	SAL Reference 280936 005 280936 006 280936 007 280936 008				
	Customer Sample Reference 050-05 050-06 050-07 050-08				
	Test Sample AR AR AR AR				
Determinand	Method	LOD	Units	Symbol	
Particulates (Total)	Grav	0.1	mg	U	0.5 0.8 <0.1 0.3

SAL Reference:	280936				
Customer Reference:	KMK METALS				
Filter GFA 47mm	Analysed as Filter GFA 47mm				
Miscellaneous					
	SAL Reference 280936 001 280936 002 280936 003 280936 004				
	Customer Sample Reference 050-01 050-02 050-03 050-04				
	Test Sample AR AR AR AR				
Determinand	Method	LOD	Units	Symbol	
Particulates (Total)	Grav (5 Dec)	0.05	mg	U	0.37 0.09 0.09 <0.05

### Index to symbols used in 280936-1

Value	Description
AR	As Received
13	Results have been blank corrected.
U	Analysis is UKAS accredited



Company Name:	KMK Metals
Site Name:	KMK Metals
Stack ID:	Dust Filtration Plant- Exhaust Stack
Date:	24/05/2012

**Technicians:**

MCERTS No:

TE1,

TE's:

Doc No

**Stack Information:****Circular Stack****Stack Diameter:**

0.8 m

**Average Flow:**

9.042 m/s

**Average Temperature:**

298.726 K

**Average Pressure:**

100.3 kPa

**Average Moisture:**

0.3 %

**Average Oxygen:**

0.0 %

**Reference Conditions:****Reference Temperature:**

273.15 K

**Reference Pressure:**

101.325 kPa

**Reference Oxygen:**

0 %

**Reference Moisture:**

0 %

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**Mass Emissions Calculations:****Volumetric Flow Rate**4.55 m<sup>3</sup>/s**Volumetric Flow Rate**16362.02 m<sup>3</sup>/hr**Volumetric Flow Rate corrected to STP**14805.33 m<sup>3</sup>/hr**Volumetric Flow Rate corrected to STP and O<sub>2</sub> ref**14805.33 m<sup>3</sup>/hr**Volumetric Flow Rate corrected to STP**14760.91 m<sup>3</sup>/hr

	Run 1	Run 2	Run 3	Run 4	Run 5	Average:
Flow	12.14	6.51	6.19	10.19	10.18	9.042
Temp.	22.33	24.78	25.96	27.78	27.78	25.726
Pressure	100.3	100.3	100.3	100.3	100.3	100.3



Company Name: KMK Metals  
Site Name: KMK Metals  
Stack ID: Dust Filtration Plant- Exhaust Stack  
Date: 24/05/2012

EPIPP  
MM0779  
TE1, TE2, TE3, TE4

MCERTS No:  
TE's:

Run 1

Particulates Data:

Certs Results:	mg	Certs No
LOD Filter:	0.05	
LOD Nozzle Wash:	0.1	
Blank Filter:	0.05	280936004
Blank Nozzle Wash:	0.3	280036008
Run Filter:	0.37	280936001
Run Nozzle Wash:	0.5	280036006
Blank	0.15	
Run	0.35	
	0.87	

Air Volume corrected to STP:  
Moisture: 0.89122 m<sup>3</sup> 0 %

Air Volume corrected to Moisture: 0.89122 m<sup>3</sup>

Stack Conditions

Average Temperature:  
Average Pressure:  
Average Moisture:  
Average Oxygen:  
Average Oxygen:

Volumetric Flow Rate corrected to STP O<sub>2</sub> ref and Moisture  
Reference Conditions  
Reference Temperature:  
Reference Pressure:  
Reference Oxygen:  
Reference Moisture:

298.726 K  
100.3 kPa  
0.3 %  
0 %

14805.33 m<sup>3</sup>/hr

Particulates Results :

	mg/m <sup>3</sup>	mg/m <sup>3</sup> corrected to O <sub>2</sub>	kg/hr	Uncertainty mg/m <sup>3</sup>
LOD	0.17	0.17	0.00	n/a
Blank	0.39	0.39	0.01	0.01
Run	0.98	0.98	0.01	0.03

Note: Blank result should be < 10% of ELV  
<20% for ELV 5mg/m<sup>3</sup> or lower  
Blank result is: #DIV/0! % of ELV  
If the blank result is higher than requirements of ELV result should be rejected

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**Particulates Uncertainty Run Calculations**  
**Uncertainty calculation for EN 13284 Determination of low range mass concentration of dust, Manual Gravimetric Method**

v14

Measurement Equation

$$c = \frac{m}{V} f_c$$

Limit value (ELV)	mg·m⁻³	Measured concentration	1.0 mg·m⁻³ (at reference conditions)	Reference oxygen	0 % by volume
-------------------	--------	------------------------	--------------------------------------	------------------	---------------

Measured Quantities	Symbol	Value	Standard uncertainty	Units	Uncertainty requirement of std
Sampled Volume	V <sub>m</sub>	0.89122	u/V <sub>m</sub>	0.001 m <sup>3</sup>	0.11    <=2%
Sampled gas Temperature	T <sub>m</sub>	298.726	u/T <sub>m</sub>	2 k	0.67    <=1%
Sampled gas Pressure	p <sub>m</sub>	100.3	u/p <sub>m</sub>	1 kPa	1.00    <=1%
Sampled gas Humidity	H <sub>m</sub>	0.3	u/H <sub>m</sub>	1 % by volume	333.33    <=1%
Oxygen content	O <sub>2,m</sub>	0	u/O <sub>2,m</sub>	0.1 % by volume	#DIV/0!    <=5%
Mass particulate	m	0.87	u/m	0.00 mg	0.00 #DIV/0!    <5% of limit value

Note - Sampled gas humidity, temperature and pressure are values at the gas meter

Leak	L	0	%	0.00    <=2%
Uncollected Mass (Instack filter - no rinse)	UCM	0	mg	0    <=10%

Intermediate calculations

Factor for std condns	f <sub>s</sub>	0.90	u (in units of f <sub>s</sub> )	u (in units of f <sub>s</sub> )
uncertainty components	symbol	sensitivity coeff	0.009	0.009
	ρ <sub>m</sub>		0.009	0.009
	H <sub>m</sub>		0.003	0.006
	T <sub>m</sub>		0.014	0.014
Corrected volume	V	0.80	u/V	0.013 m <sup>3</sup>
Factor for O <sub>2</sub> correction uncertainty components	f <sub>c</sub>	1.00	u	0.005
	O <sub>2,m</sub>	0.05		0.005
Factor for O <sub>2</sub> Correction	ufc	1.00	0.005	0.048

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Parameter	Value	Units	Sensitivity & Uncertainty contribution	Uncertainty as %
Corrected Volume (standard conc)	V	0.80 m <sup>3</sup>	1.21    0.02 mg·m⁻³	#DIV/0! %
Mass	m	0.87 mg	1.12    0.00 mg·m⁻³	#DIV/0! %
Factor for O <sub>2</sub> Correction	f <sub>c</sub>	1.00	0.98    0.00 mg·m⁻³	#DIV/0! %
Leak	L	0.00 mg·m⁻³	1.00    0.00 mg·m⁻³	#DIV/0! %
Uncollected mass	UCM	0.00 mg	1.12    0.00 mg·m⁻³	#DIV/0! %
Combined measurement uncertainty			0.02 mg·m⁻³	

Expanded uncertainty as percentage of measured value

3.28    % measured of value

expressed with a level of confidence of 95%

(Using a coverage factor k=2)

0.03    mg·m⁻³

#DIV/0! % ELV

Expanded uncertainty in units of measurement

0.03    mg·m⁻³

#DIV/0! % ELV

**Requirement in standard is for uncertainty to be < 30% at ELV at standard conditions**

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**Particulates Uncertainty Blank Calculations**  
**Uncertainty calculation for EN 13284 Determination of low range mass concentration of dust, Manual Gravimetric Method**  
v14

**Measurement Equation**

$$c = \frac{m}{V} f_c$$

Limit value (ELV)	0 mg.m <sup>-3</sup>	Reference oxygen	0 % by volume
Measured concentration	0.4 mg.m <sup>-3</sup> (at reference conditions)		

Measured Quantities	Symbol	Value	Standard uncertainty	Units	Uncertain	Requirement of std
Sampled Volume	V <sub>m</sub>	0.89122	uVm	0.001 m <sup>3</sup>	0.11	<=2%
Sampled gas Temperature	T <sub>m</sub>	298.726	uT <sub>m</sub>	2 k	0.67	<=1%
Sampled gas Pressure	p <sub>m</sub>	100.3	upm	1 kPa	1.00	<=1%
Sampled gas Humidity	H <sub>m</sub>	0.3	uH <sub>m</sub>	1 % by volume	333.33	<=1%
Oxygen content	O <sub>2,m</sub>	0	uO <sub>2,m</sub>	0.1 % by volume	#DIV/0!	<=5%
Mass particulate	m	0.35	um	0.00 mg	0.00	#DIV/0! <5% of limit value
Note - Sampled gas humidity, temperature and pressure are values at the gas meter						
Leak	L	0	uL	%	0.00	<=2%
Uncollected Mass (Instack filter - no rinse)	UCM	0	uUCM	mg	0	<=10%

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$$f_c = \frac{(100 - H_m) 273}{100} \frac{P_m}{T_m}$$

$$f_c = \frac{(100 - H_m) 273}{100} \frac{P_m}{T_m}$$

$$= V \cdot f_c$$

$$= 1.556$$

$$= 1.57$$

Parameter	Value	Units	Sensitivity c Uncertainty contribution	Uncertainty as %
Corrected Volume (standard conc)	V	0.80 m <sup>3</sup>	0.49	0.01 mg.m <sup>-3</sup>
Mass	m	0.35 mg	1.12	0.00 mg.m <sup>-3</sup>
Factor for O2 Correction	f <sub>c</sub>	1.00	0.39	#DIV/0!
Leak	L	0.00 mg.m <sup>-3</sup>	1.00	0.00 mg.m <sup>-3</sup>
Uncollected mass	UCM	0.00 mg	1.12	0.00 mg.m <sup>-3</sup>
Combined measurement uncertainty				0.01 mg.m <sup>-3</sup>

Expanded uncertainty as percentage of measured value

3.28

% measured of value

0.01 mg.m<sup>-3</sup>

Expanded uncertainty in units of measurement

#DIV/0!

% EL.V

Expanded uncertainty as percentage of limit value

expressed with a level of confidence of 95%  
(Using a coverage factor k=2)

0.00

#DIV/0!

0 %

0 %

0 %

0 %

0 %

0 %

0 %

0 %

0 %

0 %

0 %



EP/IPPP  
MM07 799  
Technicians:  
MCERTS No.:  
TE1, TE2, TE3, TE4

Company Name: KMK Metals  
Site Name: KMK Metals  
Stack ID: Dust Filtration Plant- Exhaust Stack  
Date: 24/05/2012

Run 2

Particulates Data:

Certs Results:	mg	Certs No
LOD Filler:	0.05	
LOD Nozzle Wash:	0.1	
Blank Filler:	0.05	280936004
Blank Nozzle Wash:	0.3	280036008
Run Filler:	0.09	280936002
Run Nozzle Wash:	0.8	280036007
Blank	0.15	
Run	0.35	
	0.89	

Air Volume corrected to STP:	0.48901 m <sup>3</sup>
Moisture:	0 %
Air Volume corrected to Moisture:	0.48901 m <sup>3</sup>

Stack Conditions

Average Temperature:	298.726 K
Average Pressure:	100.3 kPa
Average Moisture:	0.3 %
Average Oxygen:	0 %

Volumetric Flow Rate corrected to STP O<sub>2</sub> ref and Moisture

Reference Conditions	273.15 K
Reference Temperature:	101.325 K
Reference Pressure:	0 %
Reference Oxygen:	0 %
Reference Moisture:	0 %

Particulates Results :

	mg/m <sup>3</sup>	mg/m <sup>3</sup> corrected to O <sub>2</sub>	kg/hr	Uncertainty mg/m <sup>3</sup>
LOD	0.31	0.31	0.00	n/a
Blank	0.72	0.72	0.01	0.02
Run	1.82	1.82	0.03	0.06

Note: Blank result should be <10% of ELV  
<20% for ELV 5mg/m<sup>3</sup> or lower  
Blank result is: #DIV/0! % of ELV  
If the blank result is higher than requirements of ELV result should be rejected

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## Particulates Uncertainty Run Calculations

Uncertainty calculation for EN 13284 Determination of low range mass concentration of dust, Manual Gravimetric Method

v14

Limit value (ELV)	mg·m⁻³	Reference oxygen	0% by volume
Measured concentration	1.8 mg·m⁻³ (at reference conditions)		

$$c = \frac{m}{V} f_c$$

Measured Quantities	Symbol	Value	Standard uncertainty	Units	Uncertainty requirement of std
Sampled Volume	V <sub>m</sub>	0.48901	u <sub>Vm</sub>	0.001 m <sup>3</sup>	0.20 <= 2%
Sampled gas Temperature	T <sub>m</sub>	288.726	u <sub>Tm</sub>	21 K	0.67 <= 1%
Sampled Gas Pressure	p <sub>m</sub>	100.3	u <sub>pm</sub>	1 kPa	1.00 <= 1%
Sampled gas Humidity	H <sub>m</sub>	0.3	u <sub>Hm</sub>	1% by volume	333.33 <= 1%
Oxygen content	O <sub>2,m</sub>	0	u <sub>O2,m</sub>	0.1% by volume	#DIV/0! <= 5%
Mass particulate	m	0.86	u <sub>m</sub>	0.00 mg	0.00 #DIV/0! <5% of limit value
Note - Sampled gas humidity, temperature and pressure are values at the gas meter					
Leak	L	0		%	0.00 <= 2%
Uncollected Mass (Instack filter - no rinse)	UCM	0		mg	0 <= 10%

### Intermediate calculations

Factor for stdconds	f <sub>s</sub>	0.90	u (in units of f <sub>s</sub> )	0.009	For inspection or by owner required for O <sub>2</sub> correction only
uncertainty components	symbol	sensitivity coeff		0.009	$f_s = \frac{(100 - H_m) \cdot 273}{100} \cdot \frac{\rho_a}{T_m \cdot 101.3}$
	pm	0.009		0.009	
	Hm	0.009		0.008	
	Tm	0.003		0.014	
	ufs				1.56
Corrected volume	V	0.44	u <sub>V</sub>	0.007 m <sup>3</sup>	V = f <sub>s</sub>
Factor for O <sub>2</sub> correction	f <sub>c</sub>	1.00	u		
uncertainty components	symbol	sensitivity coeff			
	O <sub>2,m</sub>	0.05			
Factor for O <sub>2</sub> Correction	ufc	1.00	u <sub>ufc</sub>	0.006	0.48

Required for O<sub>2</sub> correction

**Particulates Uncertainty Blank Calculations**  
**Uncertainty calculation for EN 13284 Determination of low range mass concentration of dust, Manual Gravimetric Method**

v14

$$\text{Measurement Equation}$$

$$c = \frac{m}{V} f_c$$

Limit value (ELV)	0 mg·m <sup>-3</sup>	Reference oxygen	0 % by volume
Measured concentration	0.7 mg·m <sup>-3</sup> (at reference conditions)		

Measured Quantities	Symbol	Value	Standard uncertainty	Units	Uncertainty requirement of std
Sampled Volume	V <sub>m</sub>	0.46901	uV <sub>m</sub>	0.001 m <sup>3</sup>	<=2%
Sampled gas Temperature	T <sub>m</sub>	288.726	uT <sub>m</sub>	2 k	<=1%
Sampled gas Pressure	p <sub>m</sub>	100.3	up <sub>m</sub>	1 kPa	<=1%
Sampled gas Humidity	H <sub>m</sub>	0.3	uH <sub>m</sub>	1 % by volume	<=1%
Oxygen content	O <sub>2,m</sub>	0	uO <sub>2,m</sub>	0.1 % by volume	#DIV/0!
Mass particulate	m	0.35	um	0.001 mg	<5% of limit value
Note - Sampled gas humidity, temperature and pressure are values at the gas meter					
Leak	L	0	uL	%	<=2%
Uncollected Mass	UCM	0	uUCM	mg	0
(Instack filter - no rinse)					<=10%

Intermediate calculations

Factor for std cond's uncertainty components	f <sub>s</sub>	0.90	u (in units of f <sub>s</sub> )	
symbol	sensitivity coeff	0.009		
p <sub>m</sub>		0.009	f <sub>t</sub> = $\frac{(100 - H_m) \cdot 273}{100} \cdot \frac{p_m}{101.3}$	
H <sub>m</sub>		0.009		
T <sub>m</sub>		0.003		
u <sub>f<sub>s</sub></sub>				
Corrected volume	V	0.44	uV	0.007 m <sup>3</sup>
Factor for O <sub>2</sub> correction uncertainty components	f <sub>c</sub>	1.00	u	
symbol	sensitivity coeff	0.05		
O <sub>2,m</sub>				
Factor for O <sub>2</sub> Correction	uf <sub>c</sub>	1.00	u	0.005
				0.005
				1.58
				#DIV/0!
				21 / any O <sub>2,meas</sub>

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Parameter	Value	Units	Sensitivity coefficient	Uncertainty contribution	Uncertainty as %
Corrected Volume (standard con)	V	0.44 m <sup>3</sup>	1.62	0.01 mg·m <sup>-3</sup>	#DIV/0! %
Mass	m	0.35 mg	2.04	0.00 mg·m <sup>-3</sup>	#DIV/0! %
Factor for O <sub>2</sub> Correction	f <sub>c</sub>	1.00	0.72	0.00 mg·m <sup>-3</sup>	#DIV/0! %
Leak	L	0.00 mg·m <sup>-3</sup>	1.00	0.00 mg·m <sup>-3</sup>	#DIV/0! %
Uncollected mass	UCM	0.00 mg	2.04	0.00 mg·m <sup>-3</sup>	#DIV/0! %
Combined measurement uncertainty				0.01 mg·m <sup>-3</sup>	

Expanded uncertainty as percentage of measured value

expressed with a level of confidence of 95%

(Using a coverage factor k=2)

Expanded uncertainty in units of measurement	0.02 mg·m <sup>-3</sup>
Expanded uncertainty as percentage of limit value	#DIV/0! % ELV



**Company Name:** KMK Metals  
**Site Name:** KMK Metals  
**Stack ID:** Dust Filtration Plant-Exhaust Stack  
**Date:** 24/05/2012

**Technicians:** MM07, 799  
**NICERTS No.:** TE1, TE2, TE3, TE4

Run 3

Cans Results:	mg	Cans No
LOD Filter:	0.05	
LOD Nozzle Wash:	0.05	280036004
Blank Filter:	0.05	280036008
Blank Nozzle Wash:	0.3	280036002
Run Filter:	0.99	280036007
Run Nozzle Wash:	0.1	280036007
Blank	0.15	
Run	0.35	
	0.19	

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Moisture: 0 %

200 2000

**Stack Conditions**

Average Temperature:
Average Pressure:
Average Moisture:
Average Oxygen:

**Reference Conditions**  
Reference Temperature:  
Reference Pressure:  
Reference Oxygen:  
Reference Moisture:

**Particulates Results :**

**Note:** Blank result should be <10% of ELV  
<20% for ELV (mg/m<sup>3</sup>) or lower  
Blank result is: #DIV/0!  
If the blank result is higher than nonRequirements of ELV result should be rejected

**Particulates Uncertainty Run Calculations**  
v14  
**Uncertainty calculation for EN 13284 Determination of low range mass concentration of dust, Manual Gravimetric Method**

Measured Quantities	Symbol	Value	Standard uncertainty	Units	Requirement of std
Sampled Volume	Vm	0.46601	uVm	0.001 m <sup>3</sup>	0.21 <= 2%
Sampled gas Temperature	Tm	298.726	uTm	2 k	0.67 <= 1%
Sampled gas Pressure	pm	100.3	upm	1 kPa	1.00 <= 1%
Sampled gas Humidity	Hm	0.3	uHm	1 % by volume	333.30 <= 1% #DIV/0!
Oxygen content	O2,m	0	uO2,m	0.1 % by volume	<5% #DIV/0!
Mass particulate	m	0.19	um	0.00 mg	<5% of limit value
Note - Sampled gas humidity, temperature and pressure are values at the gas meter				%	
Leak	L	0		mg	0.00 <= 2%
Uncollected Mass (Instack filter - no rinse)	UCM	0		mg	0 <= 10%

Parameter	Value	Units	Sensitivity c	Uncertainty contribution	Requirement of std
Corrected Volume (standard cond)	V	0.422 m <sup>3</sup>	0.97	0.01 mg·m <sup>-3</sup> #DIV/0!	
Mass	m	0.19 mg	2.15	0.00 mg·m <sup>-3</sup> #DIV/0!	
Factor for O2 Correction	fc	1.00	0.41	0.00 mg·m <sup>-3</sup> #DIV/0!	
Leak	L	0.00 mg·m <sup>-3</sup>	1.00	0.00 mg·m <sup>-3</sup> #DIV/0!	
Uncollected mass	UCM	0.00 mg	2.15	0.00 mg·m <sup>-3</sup> #DIV/0!	
<b>Combined measurement uncertainty</b>					
	3.31	% measured of value			expressed with a level of confidence of 95% (Using a coverage factor k=2)

Parameter	Value	Units	Sensitivity c	Uncertainty contribution	Requirement of std
Corrected Volume (standard cond)	V	0.422 m <sup>3</sup>	0.97	0.01 mg·m <sup>-3</sup> #DIV/0!	
Mass	m	0.19 mg	2.15	0.00 mg·m <sup>-3</sup> #DIV/0!	
Factor for O2 Correction	fc	1.00	0.41	0.00 mg·m <sup>-3</sup> #DIV/0!	
Leak	L	0.00 mg·m <sup>-3</sup>	1.00	0.00 mg·m <sup>-3</sup> #DIV/0!	
Uncollected mass	UCM	0.00 mg	2.15	0.00 mg·m <sup>-3</sup> #DIV/0!	
<b>Combined measurement uncertainty</b>					
	3.31	% measured of value			expressed with a level of confidence of 95% (Using a coverage factor k=2)
Expanded uncertainty in units of measurement	0.01	mg·m <sup>-3</sup>			
Expanded uncertainty as percentage of limit value	#DIV/0!	% ELV			

Requirement in standard is for uncertainty to be < 30% at ELV at standard conditions

**Particulates Uncertainty Blank Calculations**  
**Uncertainty calculation for EN 13284 Determination of low range mass concentration of dust, Manual Gravimetric Method**

v14

Measurement Equation

$$c = \frac{m}{V} f_r$$

Measured concentration	0 mg·m <sup>-3</sup>	Reference oxygen 0% by volume
Measured concentration	0.8 mg·m <sup>-3</sup> (at reference conditions)	

Measured Quantities	Symbol	Value	Standard uncertainty	Units	Uncertainty requirement of std
Sampled gas Volume	V <sub>m</sub>	0.46601	uV/m	0.001 m <sup>3</sup>	0.21 ≤ 2%
Sampled gas Temperature	T <sub>m</sub>	298.726	uT/m	2.1 k	0.67 ≤ 1%
Sampled gas Pressure	p <sub>m</sub>	100.3	upm	1 kPa	1.00 ≤ 1%
Sampled gas Humidity	H <sub>m</sub>	0.3	uH/m	1 % by volume	333.33 ≤ 1%
Oxygen content	O <sub>2,m</sub>	0	uO <sub>2,m</sub>	0.1 % by volume	#DV/0! ≤ 5%
Mass particulate	m	0.365	um	0.00 mg	#DV/0! ≤ 5% of limit value
Note - Sampled gas humidity, temperature and pressure are values at the gas meter					
Leak	L	0	uL	%	0.00 ≤ 2%
Uncollected Mass (Instack filter - no rinse)	UCM	0	uUCM	mg	0 ≤ 10%

Intermediate calculations

Factor for std condns	f <sub>s</sub>	0.90	u (in units of f <sub>s</sub> )
uncertainty components	symbol	sensitivity coeff	u
pm	pm	0.009	0.009
Hm	Hm	0.008	0.008
Tm	Tm	0.003	0.006
ufs	ufs		0.014
Corrected volume	V	0.42	uV
			0.007 m <sup>3</sup>
Factor for O <sub>2</sub> correction	f <sub>c</sub>	1.00	u
uncertainty components	symbol	sensitivity coeff	u
O <sub>2,m</sub>	O <sub>2,m</sub>	0.05	0.005
Factor for O <sub>2</sub> Correction	ufc	1.00	uufc
			0.005
			0.48

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$f_r = \frac{(100 - H_m) 273}{100} \frac{\rho_{n,i}}{T_c 101.3}$

$f_r = \frac{1}{2} \frac{O_{2,m}}{1 - O_{2,m}}$

$V = f_s f_r$

1.56

1.98

Parameter	Value	Units	Sensitivity & Uncertainty contribution	Uncertainty as %
Corrected Volume (standard condns)	V	0.42 m <sup>3</sup>	1.79	0.01 mg·m <sup>-3</sup>
Mass	m	0.35 mg	2.15	0.00 mg·m <sup>-3</sup>
Factor for O <sub>2</sub> Correction	f <sub>c</sub>		0.76	#DV/0! %
Leak	L	0.00 mg·m <sup>-3</sup>	1.00	0.00 mg·m <sup>-3</sup>
Uncollected mass	UCM	0.00 mg	2.15	0.00 mg·m <sup>-3</sup>
Combined measurement uncertainty				0.01 mg·m <sup>-3</sup>

Expanded uncertainty as percentage of measured value

3.31 % measured value

0.02 mg·m<sup>-3</sup>

#DV/0! %ELV

Expressed with a level of confidence of 95%

(Using a coverage factor k=2)

Expanded uncertainty as percentage of limit value

Company Name: KMK Metals Recycling Ltd  
Licence No: W0113-03  
Year: 2012, Visit No: 2  
Report No: 012-50-02rev.1



Glenside Environmental,  
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## Stack Emissions Monitoring Report

for

KMK Metals Recycling Ltd.

Cappincur Industrial Estate, Daingean Road,  
Tullamore, Co. Offaly

EPA Waste Licence REF: W0113-03

Report No: 012-050-02 Rev.1

Monitoring Date:  
20<sup>th</sup> July 2012

Company Name: KMK Metals Recycling Ltd  
Licence No: W0113-03  
Year: 2012, Visit No: 2  
Report No: 012-50-02rev.1

Report Summary:	
Job Quotation No:	QGE12-003
Operator Licence No:	W0113-03
Operator Name:	KMK Metals Recycling Ltd.
Installation:	Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly
Contact Name:	Mr. Niall Nally
Phone No:	n/a
Monitoring dates:	20/07/2012
Monitoring Organisation:	Glenside Environmental Unit 7, Westpoint Buildings, Link Road Ballincollig
Phone No:	(021) 4810016
Email:	info@glenenv.ie
Report Date:	31/08/2012
Report written by:	Ewa Piatek
MCERTS reg No:	MM07 799
Competency:	Level 1
Function:	Technician
Endorsements:	TE1, TE2, TE3, TE4
Signed:	
Report approved by:	Patrick O'Brien
MCERTS reg No:	MM08 992
Competency:	Level 2
Function:	Team Leader
Endorsements:	TE1, TE2, TE3, TE4
Signed:	

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## 1. Introduction

Glenside Environmental was commissioned by KMK Metals Recycling Ltd to perform air emission monitoring at the facility in Cappincur Industrial Estate, Dalngean Road, Tullamore, Co. Offaly. The monitoring was carried out as specified in Technical Amendment A of the Waste Licence W0113-03 for the facility. Condition C.1.2 specifies monitoring of particulates and metals for 3 months following the date of the Technical Ammendment and quarterly thereafter. This report presents details of this monitoring programme.

## 2. Objectives

### 2.1. Substances to be monitored at each emission point

Sample Locations	Parameter
A2-8	Particulates
	Metals (Total of Cd+Tl)
	Metals (Total of Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V, Be)
	Chromium
	Lead
	Mercury
	Aluminium
	Arsenic
	Cadmium
	Copper
	Iron
	Nickel

### 2.2. Special Requirements

There were no special requirements for this monitoring campaign.

## 3. Materials and Methods

This section provides brief details of the methodologies employed to perform the air emission monitoring.

### 3.1. Particulates

A sample stream of gas is extracted from the main gas stream at representative sampling points for 30 minutes, with an isokinetically controlled flow rate and measured volume. The dust entrained in the gas sample is separated by a pre-weighed filter, which is then dried and reweighed. Deposits upstream of the filter in the sampling equipment are also recovered and weighed. The increase of mass of the filter and the deposited mass upstream of the filter are attributed to dust collected from the sampled gas, which allows the dust concentration to be calculated.

### 3.2. Metals

A known volume of flue gas is extracted representatively from a duct or a chimney during a certain period of time at a controlled flow rate following EN13284-1:2004 (Particulates Standard). The dust in the sampled gas volume is collected on a filter. Thereafter, the gas stream is passed through a series of absorbers containing absorption solutions and the filter passing fractions of the specific elements are collected within these solutions.

### 3.3. Volumetric Flow Rate

The volumetric airflow rate was determined from stack velocity measurements calculated in accordance with BS EN 13284. Airflow rate and temperature profiles were performed at pre-calculated intervals across the stack in order to determine the average velocity profile across the stack diameters. Results are presented in table 4.3.

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#### 4. Monitoring Results

Tables 4.1 present the results of the air emission monitoring sampling program carried out at the emission stacks listed below.

##### 4.1. Monitoring Results

Results reported are corrected to reference conditions as per IPPC Licence requirements.

Emission Point	Substances	ELV mg/Nm <sup>3</sup>	CEMS Results	LOD mg/Nm <sup>3</sup>	Results mg/Nm <sup>3</sup>	Results kg/hr	Uncertainty mg/m <sup>3</sup>	Date of Monitoring	Start -End Time of Monitoring
A2-8	Particulates	12.5	n/a	0.16	0.21	0.004	0.01	20/07/2012	09:27-10:08
A2-8	Metals (Total of Cd+Tl)	n/a	Consent of copyright owner for other purposes or if required for any other use.	0.0016	0.0518	0.0010	n/a	20/07/2012	10:16-10:57
A2-8	Metals (Total of Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V, Be)	n/a	n/a	0.0152	0.9140	0.0180	n/a	20/07/2012	10:16-10:57
A2-8	Chromium	n/a	n/a	0.0026	0.2902	0.0057	n/a	20/07/2012	10:16-10:57
A2-8	Lead	n/a	n/a	0.0018	0.0392	0.0008	n/a	20/07/2012	10:16-10:57
A2-8	Mercury	n/a	n/a	0.0006	0.0094	0.0002	n/a	20/07/2012	10:59-11:32
A2-8	Aluminium	n/a	n/a	0.0021	0.0124	0.0002	n/a	20/07/2012	10:16-10:57
A2-8	Arsenic	n/a	n/a	0.0007	0.0210	0.0004	n/a	20/07/2012	10:16-10:57
A2-8	Cadmium	n/a	n/a	0.0008	0.0233	0.0004	n/a	20/07/2012	10:16-10:57
A2-8	Copper	n/a	n/a	0.0010	0.0165	0.0003	n/a	20/07/2012	10:16-10:57
A2-8	Iron	n/a	n/a	0.0027	0.0279	0.0005	n/a	20/07/2012	10:16-10:57
A2-8	Nickel	n/a	n/a	0.0032	0.1469	0.0029	n/a	20/07/2012	10:16-10:57

Emission Point	Substances	ELV mg/Nm <sup>3</sup>	CEMS Results	LOD mg/Nm <sup>3</sup>	Results mg/Nm <sup>3</sup>	Results kg/hr	Uncertainty mg/m <sup>3</sup>	Date of Monitoring	Start -End Time of Monitoring
Blank	Particulates	n/a	n/a	0.16	<0.16	n/a	0.01	20/07/2012	09:15-09:20
Blank	Metals (Total of Cd+Tl)	n/a	n/a	0.0016	<0.0016	n/a	n/a	20/07/2012	11:44-11:49
Blank	Metals (Total of Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V, Be)	n/a	n/a	0.0152	<0.0152	n/a	n/a	20/07/2012	11:44-11:49
Blank	Chromium	n/a	n/a	0.0026	0.0029	n/a	n/a	20/07/2012	11:44-11:49
Blank	Lead	n/a	n/a	0.0008	0.0010	n/a	n/a	20/07/2012	11:44-11:49
Blank	Mercury	n/a	n/a	0.0006	<0.0006	n/a	n/a	20/07/2012	11:50-11:55
Blank	Aluminium	n/a	n/a	0.0021	0.0238	n/a	n/a	20/07/2012	11:44-11:49
Blank	Arsenic	n/a	n/a	0.0007	<0.0007	n/a	n/a	20/07/2012	11:44-11:49
Blank	Cadmium	n/a	n/a	0.0008	<0.0008	n/a	n/a	20/07/2012	11:44-11:49
Blank	Copper	n/a	n/a	0.0010	<0.0008	n/a	n/a	20/07/2012	11:44-11:49
Blank	Iron	n/a	n/a	0.0027	0.0095	n/a	n/a	20/07/2012	11:44-11:49
Blank	Nickel	n/a	n/a	0.0032	0.0032	n/a	n/a	20/07/2012	11:44-11:49

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Company Name: KMK Metals Recycling Ltd  
Licence No: W0113-03  
Year: 2012, Visit No: 2  
Report No: 012-50-02rev.1

#### 4.2. Reference Conditions

Emission Point	Reference Temperature	Reference Pressure	Reference Moisture	Reference Oxygen
A2-8	273 K	101.3 kPa	No correction	No correction

#### 4.3. Volumetric Flow Rate

Emission Point	Actual Moist Flow Rate	Moist Flow Rate at STP	Dry Flow Rate at STP	Emission Limit Value	Units
A2-8	21419.13	19682.58	n/a	40 000	m <sup>3</sup> /Hr

#### 4.4. Methods and Accreditation Status

Emission Point	Substances	Method	SOP Number	Accreditation Status	Analysis Laboratories	Accreditation Status
A2-8	Flow, Temperature and Pressure	BS EN 13284-2002	GEN3-001	n/a	n/a	n/a
A2-8	Particulates	BS EN 13284-2002	GEN3-001	n/a	SAL Laboratories Manchester	UKAS
A2-8	Metals	BS EN 14385:2004	GEN3-014	n/a	SAL Laboratories Manchester	n/a

#### 5. Operating Information

Emission Point	Process Status Load /Feedstock	Process Details	Fuel /Feedstock	Abatement System	Status of Abatement System
A2-8	Normal Operation	Full Load	n/a	Filter	In Operation

Company Name: KMK Metals Recycling Ltd  
Licence No: W0113-03  
Year: 2012, Visit No: 2  
Report No: 012-50-02rev.1

## 6. Monitoring Deviation

Requirements	Comments
Substances were monitored as per monitoring objectives	Yes
Substances were monitored in accordance with the monitoring stated in AG2 (Air Emissions Monitoring Guidance Note#2)	Yes
All monitoring substances were carried out as per Standard/Methods requirements.	Yes

## Sampling Location Summary

Requirements	Comments
Stack Shape	Circular
Dimensions	0.8
Recommended 5 hydraulic diameters straight length before sampling plane	Yes
Recommended 2 hydraulic diameters straight length after sampling plane	No
Sufficient ports number Small stacks – 1 port <1.5m – 2 ports >1.5m – 4 ports	1 port
Appropriate port size	Yes
Suitable working platform	Yes
Safe and clean working environment	Yes

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**7. Annex 1**

**7.1. Personnel**

Scientist/Technician Name	Position	Qualification	Technical Endorsements	MCERTS Number
Ewa Piatek	Technician	Level 1	TE1, TE2, TE3, TE4	MM07 799
Patrick Power	Technician	Trainee	-	MM12 1183

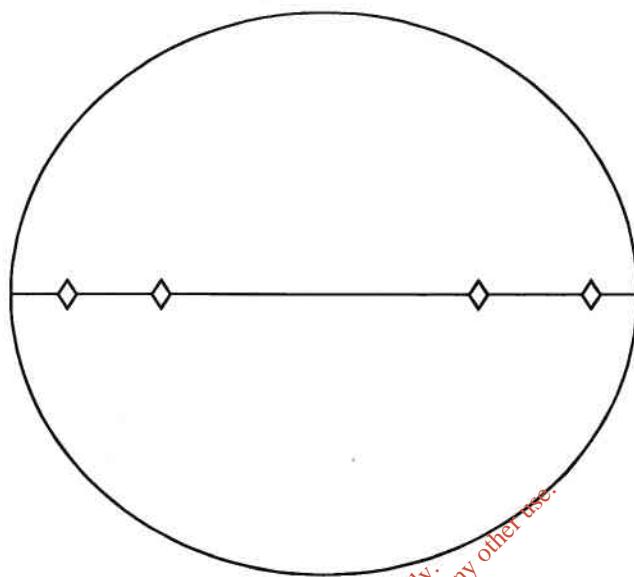
**7.2. Equipment used**

Equipment	GEN Equipment No
TCR	EQ050
Impinger System	EQ051
Probe	EQ052
Pitot tube	EQ053
Nozzles	EQ054
Filters	Laboratory supplied

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## 8. Annex 2

### 8.1. Diagrams of the stack



### 8.2. Sampling measurements

Determinant	Result	Units
Number of Ports Sampled	1	-
Number of Points Sampled	4	-
Average Velocity v'a	11.84	m/s
Average Pressure	100.3	kPa
Average Temperature	21.15	°C
Stack Diameter	0.8	m
T Reference	273	Deg K
P Reference	101.3	kPa
Isokinetic condition	Particulates -3.05 Metals -0.84 Mercury -1.90	%
Oxygen	n/a	%
Water vapour	n/a	%

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Company Name: KMK Metals Recycling Ltd

Licence No: W0113-03

Year: 2012, Visit No: 2

Report No: 012-50-02rev.1

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## 9. Annex 3

### 9.1. Results and uncertainty calculations, certificates of analysis

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# Scientific Analysis Laboratories Ltd

## Certificate of Analysis

Hadfield House  
Hadfield Street  
Cornbrook  
Manchester  
M16 9FE  
Tel : 0161 874 2400  
Fax : 0161 874 2404

**Report Number:** 289009-2

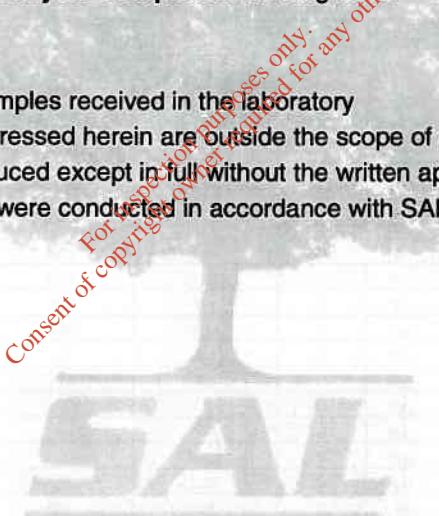
**Date of Report:** 29-Aug-2012

**Customer:** Glenside Environmental  
Unit 7  
Westpoint Buildings  
Ballincollig.  
CO. CORK, VAT REG 9683448N

**Customer Contact:** Mr Patrick Power

**Customer Job Reference:** KMK Metals  
**Customer Purchase Order:** 012-050-02 KMK  
**Date Job Received at SAL:** 26-Jul-2012  
**Date Analysis Started:** 31-Jul-2012  
**Date Analysis Completed:** 29-Aug-2012

The results reported relate to samples received in the laboratory  
Opinions and interpretations expressed herein are outside the scope of UKAS accreditation  
This report should not be reproduced except in full without the written approval of the laboratory  
Tests covered by this certificate were conducted in accordance with SAL SOPs



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Report checked  
and authorised by :  
Mary Drury  
Project Manager

Issued by :  
Mary Drury  
Project Manager

Signature Not Verified  
Digitally signed by Mary Drury  
Date: 2012.08.29 15:28:54 BST  
Reason: Issue  
Location: SAL

SAL Reference:	289009				
Customer Reference:	KMK Metals				
Filter GFA 47mm	Analysed as Filter GFA 47mm				
Miscellaneous					
SAL Reference	289009 001				
Customer Sample Reference	050-02-01 RUN 1 FILTER RUN				
Test Sample	AR				
Date Sampled	20-JUL-2012				
Determinand	Method	LOD	Units	Symbol	
Particulates (Total)	Grav (5 Dec)	0.05	mg	U	0.10
					<0.05

SAL Reference:	289009				
Customer Reference:	KMK Metals				
Wash(DI)	Analysed as Wash(DI)				
Miscellaneous					
SAL Reference	289009 003				
Customer Sample Reference	050-02-03 RUN 1 NOZZLE WASH				
Test Sample	AR				
Date Sampled	20-JUL-2012				
Determinand	Method	LOD	Units	Symbol	
Particulates (Total)	Grav	0.1	mg	U	<0.1
					<0.1

SAL Reference:	289009				
Customer Reference:	KMK Metals				
Impinger (5%HNO3/5%H2O2)	Analysed as Impinger (3.3%HNO3/1.5%H2O2)				
BS EN 14385 Metals Suite					
SAL Reference	289009 005				
Customer Sample Reference	050-02-05 RUN 2 METALS IMPIINGER 1				
Test Sample	AR				
Date Sampled	20-JUL-2012				
SAL Reference	289009 006				
Customer Sample Reference	050-02-06 RUN 2 METALS IMPIINGER 2				
Test Sample	AR				
Date Sampled	20-JUL-2012				
SAL Reference	289009 007				
Customer Sample Reference	050-02-07 RUN 2 METALS IMPIINGER 3				
Test Sample	AR				
Date Sampled	20-JUL-2012				
SAL Reference	289009 008				
Customer Sample Reference	050-02-08 METALS IMPIINGER BLANK				
Determinand	Method	LOD	Units	Symbol	
Antimony	ICPMS (BS EN 14385)	0.5	µg/l	U	<0.5
Arsenic	ICPMS (BS EN 14385)	0.2	µg/l	U	<0.2
Beryllium	ICPMS (BS EN 14385)	0.5	µg/l	U	<0.5
Cadmium	ICPMS (BS EN 14385)	0.5	µg/l	U	<0.5
Chromium	ICPMS (BS EN 14385)	0.5	µg/l	U	0.6
Cobalt	ICPMS (BS EN 14385)	0.2	µg/l	U	<0.2
Copper	ICPMS (BS EN 14385)	1	µg/l	U	4
Lead	ICPMS (BS EN 14385)	0.3	µg/l	U	5.3
Manganese	ICPMS (BS EN 14385)	2	µg/l	U	9
Nickel	ICPMS (BS EN 14385)	2	µg/l	U	<2
Thallium	ICPMS (BS EN 14385)	0.3	µg/l	U	<0.3
Vanadium	ICPMS (BS EN 14385)	0.3	µg/l	U	<0.3
Volume	ICPMS (BS EN 14385)	1	ml	U	92
					100
					100
					99

SAL Reference:	289009				
Customer Reference:	KMK Metals				
Impinger (5%HNO3/5%H2O2)	Analysed as Impinger (3.3%HNO3/1.5%H2O2)				
Suite F					
SAL Reference	289009 005				
Customer Sample Reference	050-02-05 RUN 2 METALS IMPIINGER 1				
Test Sample	AR				
Date Sampled	20-JUL-2012				
SAL Reference	289009 006				
Customer Sample Reference	050-02-06 RUN 2 METALS IMPIINGER 2				
Test Sample	AR				
Date Sampled	20-JUL-2012				
SAL Reference	289009 007				
Customer Sample Reference	050-02-07 RUN 2 METALS IMPIINGER 3				
Test Sample	AR				
Date Sampled	20-JUL-2012				
SAL Reference	289009 008				
Customer Sample Reference	050-02-08 METALS IMPIINGER BLANK				
Determinand	Method	LOD	Units	Symbol	
Aluminium	ICPMS (BS EN 14385)	1	µg/l	N	<1
Iron	ICPMS (BS EN 14385)	1	µg/l	N	<1
					<1
					<1

SAL Reference:	289009
Customer Reference:	KMK Metals
Probe Wash (27.5%HNO3)	Analysed as Probe Wash (27.5%HNO3)
BS EN 14385 Metals Suite	
SAL Reference	289009 009
Customer Sample Reference	050-02-09 METALS PROBE WASH
Test Sample	AR
Date Sampled	20-JUL-2012

Determinand	Method	LOD	Units	Symbol		
Antimony	ICPMS (HF BS EN 14385)	1	µg	U	<1	<1
Arsenic	ICPMS (HF BS EN 14385)	0.5	µg	U	(13) <0.5	(13) <0.5
Beryllium	ICPMS (HF BS EN 14385)	0.5	µg	U	<0.5	<0.5
Cadmium	ICPMS (HF BS EN 14385)	0.5	µg	U	<0.5	<0.5
Chromium	ICPMS (HF BS EN 14385)	2	µg	U	<2	<2
Cobalt	ICPMS (HF BS EN 14385)	0.5	µg	U	<0.5	<0.5
Copper	ICPMS (HF BS EN 14385)	0.5	µg	U	<0.5	<0.5
Lead	ICPMS (HF BS EN 14385)	0.5	µg	U	<0.5	<0.5
Manganese	ICPMS (HF BS EN 14385)	2	µg	U	<2	<2
Nickel	ICPMS (HF BS EN 14385)	2	µg	U	<2	<2
Thallium	ICPMS (HF BS EN 14385)	0.5	µg	U	<0.5	<0.5
Vanadium	ICPMS (HF BS EN 14385)	0.5	µg	U	<0.5	<0.5

SAL Reference:	289009
Customer Reference:	KMK Metals
Probe Wash (27.5%HNO3)	Analysed as Probe Wash (27.5%HNO3)
Suite C	
SAL Reference	289009 009
Customer Sample Reference	050-02-09 METALS PROBE WASH
Test Sample	AR
Date Sampled	20-JUL-2012

Determinand	Method	LOD	Units	Symbol		
Aluminium	ICPMS (HF BS EN 14385)	1	µg	N		13
Iron	ICPMS (HF BS EN 14385)	1	µg	N	(13) <1	(13) 92

SAL Reference:	289009
Customer Reference:	KMK Metals
Filter	Analysed as Filter
BS EN 14385 Metals Suite	
SAL Reference	289009 011
Customer Sample Reference	050-02-11 METALS FILTER
Test Sample	AR
Date Sampled	20-JUL-2012

Determinand	Method	LOD	Units	Symbol		
Antimony	ICPMS (HF BS EN 14385)	0.5	µg	U	21	<0.5
Arsenic	ICPMS (HF BS EN 14385)	0.5	µg	U	(13) 17	(13) <0.5
Beryllium	ICPMS (HF BS EN 14385)	0.5	µg	U	4.2	<0.5
Cadmium	ICPMS (HF BS EN 14385)	0.5	µg	U	18	<0.5
Chromium	ICPMS (HF BS EN 14385)	1	µg	U	240	<1
Cobalt	ICPMS (HF BS EN 14385)	0.5	µg	U	6.4	<0.5
Copper	ICPMS (HF BS EN 14385)	0.5	µg	U	11	<0.5
Lead	ICPMS (HF BS EN 14385)	0.5	µg	U	29	<0.5
Manganese	ICPMS (HF BS EN 14385)	0.5	µg	U	260	<0.5
Nickel	ICPMS (HF BS EN 14385)	1	µg	U	120	<1
Thallium	ICPMS (HF BS EN 14385)	0.5	µg	U	24	<0.5
Vanadium	ICPMS (HF BS EN 14385)	0.5	µg	U	35	<0.5

<b>SAL Reference:</b> 289009 <b>Customer Reference:</b> KMK Metals						
Filter	Analysed as Filter					
<b>Filter suite 6</b>						
	<b>SAL Reference</b>	289009 011	289009 012			
	<b>Customer Sample Reference</b>	050-02-11 METALS FILTER	050-02-12 METALS FILTER BLANK			
	<b>Test Sample</b>	AR	AR			
	<b>Date Sampled</b>	20-JUL-2012	20-JUL-2012			
<b>Determinand</b>	<b>Method</b>	<b>LOD</b>	<b>Units</b>	<b>Symbol</b>		
Aluminium	ICPMS (HF BS EN 14385)	0.5	µg	N	(13) 3.1	(13) 5.6
Iron	ICPMS (HF BS EN 14385)	1	µg	N	(13) 22	(13) <1

<b>SAL Reference:</b> 289009 <b>Customer Reference:</b> KMK Metals						
Impinger (2%KMnO4/10%H2SO4)	Analysed as Impinger (2%KMnO4/10%H2SO4)					
<b>Miscellaneous</b>						
	<b>SAL Reference</b>	289009 013	289009 014	289009 015		
	<b>Customer Sample Reference</b>	050-02-13 RUN 3 MERCURY IMPINGER 1	050-02-14 RUN 3 MERCURY IMPINGER 2	050-02-15 RUN 3 MERCURY IMPINGER BLANK		
	<b>Test Sample</b>	AR	AR	AR		
	<b>Date Sampled</b>	20-JUL-2012	20-JUL-2012	20-JUL-2012		
<b>Determinand</b>	<b>Method</b>	<b>LOD</b>	<b>Units</b>	<b>Symbol</b>		
Mercury	CVAFS (BS EN 13211)	5	µg/l	U	86	<5
Volume	CVAFS (BS EN 13211)	1	ml	U	100	100
						90

<b>SAL Reference:</b> 289009 <b>Customer Reference:</b> KMK Metals						
Probe Wash (27.5%HNO3)	Analysed as Probe Wash (27.5%HNO3)					
<b>Miscellaneous</b>						
	<b>SAL Reference</b>	289009 016				
	<b>Customer Sample Reference</b>	050-02-16 MERCURY PROBE WASH				
	<b>Test Sample</b>	AR				
	<b>Date Sampled</b>	20-JUL-2012				
<b>Determinand</b>	<b>Method</b>	<b>LOD</b>	<b>Units</b>	<b>Symbol</b>		
Mercury	CVAFS (HF Digest BS EN 13211)	0.01	µg	U	(13) <0.01	

<b>SAL Reference:</b> 289009 <b>Customer Reference:</b> KMK Metals						
Filter	Analysed as Filter					
<b>Miscellaneous</b>						
	<b>SAL Reference</b>	289009 017				
	<b>Customer Sample Reference</b>	050-02-17 RUN 3 FILTER MERCURY				
	<b>Test Sample</b>	AR				
	<b>Date Sampled</b>	20-JUL-2012				
<b>Determinand</b>	<b>Method</b>	<b>LOD</b>	<b>Units</b>	<b>Symbol</b>		
Mercury	CVAFS (HF Digest BS EN 13211)	0.01	µg	U	(13) 0.02	

### Index to symbols used in 289009-2

Value	Description
AR	As Received
13	Results have been blank corrected.
U	Analysis is UKAS accredited
N	Analysis is not UKAS accredited



Company Name: KMK  
Site Name: KMK  
Stack ID: A2-8  
Date: 20/07/2012

Stack Information:  
**Circular Stack**

Stack Diameter:

0.8 m

Average Flow:

11.84 m/s

Average Temperature:

284.15 K

Average Pressure:

100.3 kPa

Average Moisture:

%

Average Oxygen:

0 %

Reference Conditions:

Reference Temperature:

273.15 K

Reference Pressure:

101.325 kPa

Reference Oxygen:

0 %

Reference Moisture:

0 %

Mass Emissions Calculations:

Volumetric Flow Rate

5.95 m<sup>3</sup>/s

21419.13 m<sup>3</sup>/hr

Volumetric Flow Rate corrected to STP

19882.58 m<sup>3</sup>/hr

Volumetric Flow Rate corrected to STP and O<sub>2</sub> ref

19882.58 m<sup>3</sup>/hr

Volumetric Flow Rate corrected to STP

19882.58 m<sup>3</sup>/hr

Run 1 Part	Run 2 Metals	Run 3 Mercury	Average:
Flow	12.96	11.23	11.32
Temp.	19.99	21.38	22.09
Pressure	100.3	100.3	100.3

EF/PP  
MM07/799  
TE1, TE2, TE3, TE4

TechnoLine:  
MCERTS No:  
TE's:  
Doc No:

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Company Name:  
Site Name:  
Stack ID:  
Date:

Technicians:  
MCERTS No:  
TE's:  
EPIPP  
MM07789  
A2-8  
TE1, TE2, TE3, TE4

KMK  
KMK  
A2-8  
20/07/2012

Particulates Data:

Certs Results:	mg	Certs No
LOD Filter:	0.05	
LOD Nozzle Wash:	0.1	
Blank Filter:	0.05	289009 002
Blank Nozzle Wash:	0.1	289009 003
Run Filter:	0.1	289009 001
Run Nozzle Wash:	0.1	289009 004
Blank	0.15	
Run	0.2	

Air Volume corrected to STP:	0.94625 m <sup>3</sup>	0 %
Air Volume corrected to Moisture:	0.94625 m <sup>3</sup>	

Stack Conditions

Average Temperature:	294.153333 K
Average Pressure:	100.3 kPa
Average Moisture:	0 %
Average Oxygen:	0 %
Volumetric Flow Rate corrected to STP O <sub>2</sub> ref and Moisture	19682.58 m <sup>3</sup> /hr

Reference Conditions

Reference Temperature:	273.15 K
Reference Pressure:	101.325 kPa
Reference Oxygen:	0 %
Reference Moisture:	0 %

Particulates Results :

	mg/m <sup>3</sup>	mg/m <sup>3</sup> corrected to O <sub>2</sub>	kg/hr	Uncertainty mg/m <sup>3</sup>
LOD	0.16	0.16	0.003	n/a
Blank	0.16	0.16	0.003	0.01
Run	0.21	0.21	0.004	0.01

Note: Blank result should be < 10% of ELV  
<20% for ELV 5mg/m<sup>3</sup> or lower  
Blank result is: 1 % of ELV  
If the blank result is higher than requirements of ELV result should be rejected

**Particulates Uncertainty Run Calculations**  
**Uncertainty calculation for EN 13284 Determination of low range mass concentration of dust, Manual Gravimetric Method**

v14

Limit value (ELV)	12.5 mg·m <sup>-3</sup>	Reference oxygen	0 % by volume
Measured concentration	0.2 mg·m <sup>-3</sup> (at reference conditions)		

Uncertainty calculation for EN 13284 Determination of low range mass concentration of dust, Manual Gravimetric Method

Measurement Equation

$$c = \frac{m}{\rho} f_c$$

Measured Quantities	Symbol	Value	Standard uncertainty	Units	Uncertainty contribution to the result of measurement
Sampled Volume	V <sub>m</sub>	0.94625	u <sub>Vm</sub>	m <sup>3</sup>	0.11 <= 2%
Sampled gas Temperature	T <sub>m</sub>	294.153333	u <sub>Tm</sub>	k	0.68 <= 1%
Sampled gas Pressure	p <sub>m</sub>	100.3	u <sub>pm</sub>	kPa	1.00 <= 1%
Sampled gas Humidity	H <sub>m</sub>	0	u <sub>Hm</sub>	% by volume	1.00 <= 1%
Oxygen content	O <sub>2,m</sub>	0	u <sub>O2,m</sub>	% by volume	#DIV/0! <= 3%
Mass particulate	m	0.2	u <sub>m</sub>	mg	0.00 <= 5% of limit value
Note - Sampled gas humidity, temperature and pressure are values at the gas meter					
Leak	L	0	u <sub>L</sub>	%	0.00 <= 2%
Uncollected Mass (Instack filter - no rinse)	UCM	0	u <sub>UCM</sub>	mg	0 <= 10%
Intermediate calculations					
Factor for std condns uncertainty components	f <sub>s</sub>	0.92			
	symbol	sensitivity coeff	u (in units of f <sub>s</sub> )		
	pm	0.009	0.009		
	Hm	0.009	0.009		
	T <sub>m</sub>	0.003	0.006		
	ufs	0.014	0.014		
Corrected volume	V	0.87	u <sub>V</sub>	m <sup>3</sup>	1.57
Factor for O <sub>2</sub> correction uncertainty components	f <sub>c</sub>	1.00	u <sub>f<sub>c</sub></sub>		Required for inspection or flight owner purposes only.
	symbol	sensitivity coeff	u		
	O <sub>2,m</sub>	0.05	0.005		
Factor for O <sub>2</sub> Correction	ufc	1.00	u <sub>ufc</sub>		$f_c = \frac{2^{0.07} \cdot O_{2,m}}{21 - O_{2,m}}$
					0.48

Consent of COTRA  
(in units of f<sub>s</sub>)

$$f_s = \frac{(100 - H_m) \cdot 273}{100} \cdot \frac{\rho_m}{T_m \cdot 101.3}$$

Parameter	Value	Units	Sensitivity contribution to the result of measurement	Uncertainty as %
Corrected Volume (standard con <sup>n</sup> )	V	0.87 m <sup>3</sup>	0.24 0.00 mg·m <sup>-3</sup>	0.03 %
Mass	m	0.20 mg	1.06 0.00 mg·m <sup>-3</sup>	0.00 %
Factor for O <sub>2</sub> Correction	f <sub>c</sub>	1.00	0.21 0.00 mg·m <sup>-3</sup>	0.01 %
Leak	L	0.00 mg·m <sup>-3</sup>	1.00 0.00 mg·m <sup>-3</sup>	0.00 %
Uncollected mass	UCM	0.00 mg	1.06 0.00 mg·m <sup>-3</sup>	0.00 %
Combined measurement uncertainty			0.00 mg·m <sup>-3</sup>	

Expanded uncertainty as percentage of measured value

3.28 % measured of value

expressed with a level of confidence of 95%  
(using a coverage factor k=2)

0.01 mg·m<sup>-3</sup>

Requirement in standard is for uncertainty to be < 30% at ELV at standard conditions

0.1 % ELV

Expanded uncertainty in units of measurement

0.1 % ELV

Expanded uncertainty as percentage of limit value

0.1 % ELV

Requirement in standard is for uncertainty to be < 30% at ELV at standard conditions

0.1 % ELV

Requirement in standard is for uncertainty to be < 30% at ELV at standard conditions

0.1 % ELV

Requirement in standard is for uncertainty to be < 30% at ELV at standard conditions

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Requirement in standard is for uncertainty to be < 30% at ELV at standard conditions

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**Particulates Uncertainty Blank Calculations**  
**Uncertainty calculation for EN 13284 Determination of low range mass concentration of dust, Manual Gravimetric Method**

v14  
 Limit value (ELV) 1.25 mg.m<sup>-3</sup> Reference oxygen 0 % by volume  
 Measured concentration 0.2 mg.m<sup>-3</sup> (at reference conditions)

				Measurement Equation	
				$c = \frac{m}{V} f_c$	
Measured Quantities	Symbol	Value	Standard uncertainty	Units	Uncertain in requirement of std
Sampled Volume	V <sub>m</sub>	0.94625	u/V <sub>m</sub>	0.001 m <sup>3</sup>	<=2%
Sampled gas Temperature	T <sub>m</sub>	294.153333	u/T <sub>m</sub>	2 K	<=1%
Sampled gas Pressure	p <sub>m</sub>	100.3	u/p <sub>m</sub>	1 kPa	<=1%
Sampled gas Humidity	H <sub>m</sub>	0	u/H <sub>m</sub>	1 % by volume	<=1%
Oxygen content	O <sub>2,m</sub>	0	u/O <sub>2,m</sub>	0.1 % by volume	<=5%
Mass particulate	m	0.15	u/m	0.00 mg	#DIV/0!
Note - Sampled gas humidity, temperature and pressure are values at the gas meter	L	0			<5% of limit value
Leak	UCM	0			<=2%
Uncollected Mass (Instack filter - no rinse)					<=10%
Intermediate calculations					
Factor for std condns uncertainty components	f <sub>s</sub>	0.92	u (in units of %)		
	symbol	sensitivity coeff			
	p <sub>m</sub>	0.009	0.008		
	H <sub>m</sub>	0.009	0.008		
	T <sub>m</sub>	0.003	0.006		
	u/f <sub>s</sub>		0.014		
Corrected volume	V	0.87	u/V	0.014 m <sup>3</sup>	1.57
Factor for O <sub>2</sub> correction uncertainty components	f <sub>c</sub>	1.00	u		
	symbol	sensitivity coeff			
	O <sub>2,m</sub>	0.05	0.005		
Factor for O <sub>2</sub> Correction	u/f <sub>c</sub>	1.00	0.005		0.48
Parameter	Value	Units	Sensitivity c	Uncertainty contribution	Uncertainty as %
Corrected Volume (standard con)	V	0.87 m <sup>3</sup>	0.18	0.00 mg.m <sup>-3</sup>	0.20 %
Mass	m	0.15 mg	1.06	0.00 mg.m <sup>-3</sup>	0.00 %
Factor for O <sub>2</sub> Correction	f <sub>c</sub>	1.00	0.16	0.00 mg.m <sup>-3</sup>	0.06 %
Leak	L	0.00 mg.m <sup>-3</sup>	1.00	0.00 mg.m <sup>-3</sup>	0.00 %
Uncollected mass	UCM	0.00 mg	1.06	0.00 mg.m <sup>-3</sup>	0.00 %
Combined measurement uncertainty				0.00 mg.m <sup>-3</sup>	
Expanded uncertainty as percentage of measured value		3.28	% measured of value		
Expanded uncertainty in units of measurement		0.01	mg.m <sup>-3</sup>		
Expanded uncertainty as percentage of limit value		0.4	% ELV		

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$$f_c = \frac{(100 - H_m) \cdot 273}{100} \cdot \frac{\rho_m}{T_m \cdot 101.3}$$

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expressed with a level of confidence of 95%  
 (Using a coverage factor k=2)

0.01 mg.m<sup>-3</sup>  
 0.4 % ELV



Company Name:  
Site Name:  
Stack ID:  
Date:

KMK  
KMK  
A2-A  
2007/2012

EPIPP  
MM07789  
TE1, TE2, TE3, TE4

Technician:  
MCERTS No:  
TEc.

Run	Lab Results	LOD Filter	LOD Probe W LOD Intensifiers	Filter	Rinse	Impinger 1	Impinger 2	Impinger 3	Impinger 4	Impinger 5	Impinger 6	Blank	Lab Results	Filter	Rinse	Impinger 1	Impinger 2	Impinger 3	Impinger 4	Impinger 5	Impinger 6	Impinger 7	Impinger 8
	Aluminum	0.5	UR	1	3.1	7	1	0.5	0.5	0.5	1	n/a	Aluminum	90	6.8	13	1	0.5	0.5	0.5	0.5	n/a	n/a
	Antimony	0.05	1	0.5	21	1	0.5	0.2	0.2	0.2	1	n/a	Antimony	0.05	0.05	0.5	0.5	0.5	0.5	0.5	0.5	n/a	n/a
	Arsenic	0.05	0.5	0.2	17	0.5	0.5	0.2	0.2	0.2	0.2	n/a	Arsenic	0.05	0.05	0.5	0.5	0.5	0.5	0.5	0.5	n/a	n/a
	Boron	0.05	0.5	0.5	4.2	0.5	0.5	0.5	0.5	0.5	0.5	n/a	Boron	0.05	0.05	0.5	0.5	0.5	0.5	0.5	0.5	n/a	n/a
	Beryllium	0.05	0.5	0.5	18	0.5	0.5	0.5	0.5	0.5	0.5	n/a	Beryllium	0.05	0.05	0.5	0.5	0.5	0.5	0.5	0.5	n/a	n/a
	Boron	0.05	0.5	0.5	240	2	0.5	0.5	0.5	0.5	0.5	n/a	Boron	0.05	0.05	0.5	0.5	0.5	0.5	0.5	0.5	n/a	n/a
	Chromium	0.05	2	0.5	6.4	0.5	4.0	0.2	0.2	0.2	0.2	1.7	Chromium	0.4	0.4	2	0.5	0.5	0.5	0.5	0.5	n/a	n/a
	Cobalt	0.05	0.5	0.2	11	0.5	5.3	1.0	1.0	1.0	1.0	0.7	Cobalt	0.05	0.05	0.5	0.5	0.5	0.5	0.5	0.5	n/a	n/a
	Copper	0.05	1	1	22	1	1.0	1.0	1.0	1.0	1.0	n/a	Copper	0.05	0.05	1.0	1.0	1.0	1.0	1.0	1.0	n/a	n/a
	Iron	1	1	22	1	1	1.0	1.0	1.0	1.0	1.0	n/a	Iron	1	1	1	1	1	1	1	1	n/a	n/a
	Lanthanum	0.05	0.5	0.3	26	0.5	9.0	8.1	8.1	8.1	8.1	n/a	Lanthanum	0.22	0.22	0.3	0.3	0.3	0.3	0.3	0.3	n/a	n/a
	Manganese	0.05	2	2	260	2	3.0	13.0	13.0	13.0	13.0	7.0	Manganese	0.1	0.1	2	2	2	2	2	2	n/a	n/a
	Nickel	0.05	2	120	2	2.0	2.0	3.0	3.0	3.0	3.0	n/a	Nickel	0.48	0.48	2	2	2	2	2	2	n/a	n/a
	Selenium	0.05	0.5	0.3	24	0.5	0.3	0.3	0.3	0.3	0.3	n/a	Selenium	0.05	0.05	0.5	0.5	0.5	0.5	0.5	0.5	n/a	n/a
	Silver	0.05	0.5	0.3	24	0.5	0.3	0.3	0.3	0.3	0.3	n/a	Silver	0.05	0.05	0.5	0.5	0.5	0.5	0.5	0.5	n/a	n/a
	Thallium	0.05	0.5	0.3	35	0.5	0.3	0.3	0.3	0.3	0.3	n/a	Thallium	0.05	0.05	0.3	0.3	0.3	0.3	0.3	0.3	n/a	n/a
	Tin	0.05	0.5	0.3	35	0.5	0.3	0.3	0.3	0.3	0.3	n/a	Tin	0.05	0.05	0.3	0.3	0.3	0.3	0.3	0.3	n/a	n/a
	Vanadium	0.05	0.01	5	0.02	0.01	0.01	0.01	0.01	0.01	0.01	n/a	Vanadium	0.05	0.05	0.3	0.3	0.3	0.3	0.3	0.3	n/a	n/a
	Zinc	0.05	0.01	5	0.02	0.01	0.01	0.01	0.01	0.01	0.01	n/a	Zinc	0.05	0.05	0.3	0.3	0.3	0.3	0.3	0.3	n/a	n/a
	Mercury	0.05	0.01	5	0.02	0.01	0.01	0.01	0.01	0.01	0.01	n/a	Mercury	0.05	0.05	0.3	0.3	0.3	0.3	0.3	0.3	n/a	n/a

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Run	Solvents Volume ml	Impinger 1 Mercury	Impinger 2 Mercury	Impinger 3 Mercury	Impinger 4 Mercury	Impinger 5 Mercury	Blank	Impinger 1 99	Impinger 2 99	Impinger 3 99	Impinger 4 99	Impinger 5 99
Average Temperature: Average Pressure: Air Volume connected to STP and Moisture:	92	0.43508 m <sup>3</sup>	0.43508 m <sup>3</sup>									
Average Temperature: Average Pressure: Air Volume connected to STP and Moisture:	294.15 K 101.325 kPa 0 % 0 %	273.15 K 101.325 kPa 0 % 0 %										
Volumetric Flow Rate connected to STP: O <sub>2</sub> ref and Moisture	18602.58 m <sup>3</sup> /hr											
Reference Conditions:												
Reference Temperature: Reference Pressure: Reference Oxygen: Reference Moisture:												
Results :	mg in sampling LOD	mg in sampling train Blank	mg in sampling STPDry Blank	mg/m <sup>3</sup> at STPDry Blank	mg/m <sup>3</sup> at STPDry Run	Connected to reference oxygen LOD	Connected to reference oxygen Run	Connected to reference oxygen Blank	Connected to reference oxygen Run	Connected to reference oxygen Run	Connected to reference oxygen Blank	Connected to reference oxygen Run
Aluminum	0.0018	0.0104	0.0213	0.0285	0.0285	0.021	0.0238	0.0113	0.0285	0.021	0.0238	0.0002
Antimony	0.0012	0.0221	0.0014	0.0285	0.0285	0.0014	0.0285	0.0113	0.0285	0.0014	0.0285	0.0005
Barium	0.0006	0.0176	0.0006	0.0210	0.0007	0.0007	0.0210	0.0077	0.0007	0.0007	0.0007	0.0004
Boron	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Cadmium	0.0007	0.0167	0.0006	0.0223	0.0223	0.0007	0.0223	0.0001	0.0007	0.0007	0.0007	0.0004
Chromium	0.0022	0.2423	0.0028	0.2462	0.2462	0.0028	0.2462	0.0001	0.2462	0.0028	0.2462	0.0001
Cobalt	0.0006	0.0074	0.0006	0.0058	0.0007	0.0007	0.0058	0.0001	0.0007	0.0007	0.0007	0.0003
Copper	0.0008	0.0138	0.0008	0.0110	0.0110	0.0008	0.0110	0.0008	0.0008	0.0008	0.0008	0.0003
Iron	0.0023	0.0233	0.0031	0.0027	0.0027	0.0027	0.0027	0.0005	0.0027	0.0027	0.0027	0.0005
Lanthanides	0.0023	0.0327	0.0048	0.0008	0.0008	0.0008	0.0008	0.0001	0.0008	0.0008	0.0008	0.0001
Manganese	0.0025	0.2943	0.0023	0.0032	0.0032	0.0023	0.0032	0.0001	0.0023	0.0023	0.0023	0.0002
Nickel	0.0025	0.1227	0.0027	0.0049	0.0049	0.0027	0.0049	0.0002	0.0049	0.0027	0.0049	0.0002
Platinum	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Selenium	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Silver	0.0005	0.0246	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0000
Thallium	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Tin	0.0008	0.0356	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006
Zinc	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mercury	0.0015	0.0073	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0006	0.0002
Total of Metals	0.0181	0.0402	0.1165	0.0217	0.0217	0.1385	0.0217	0.0001	0.1385	0.0217	0.1385	0.0027
Total of Cd and Tl	0.0013	0.0432	0.0012	0.0016	0.0016	0.0014	0.0016	0.0004	0.0014	0.0016	0.0014	0.0010
Total of Sb, As, Pb, Cu, Cd, Cu, Hg, V, Bi	0.0022	0.0452	0.0012	0.0016	0.0016	0.0014	0.0016	0.0004	0.0016	0.0016	0.0014	0.0010

# **Appendix 2**

**Noise submission July and response August 2012**

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Office of  
Environmental  
Enforcement

Mr Kurt M Kyck,  
Managing Director,  
KMK Metals Recycling Limited,  
Cappincur Industrial Estate ,  
Daingean Road,  
Tullamore,  
Co. Offaly.

Regional Inspectorate, Seville Lodge  
Callan Road, Kilkenny, Ireland  
Cigireacht Réigiúnach, Lóiste Sevilla,  
Bóthar Challainn, Cill Chainnigh, Éire  
T: +353 56 779 6700  
F: +353 56 779 6798  
E: info@epa.ie  
W: www.epa.ie  
LoCall: 1890 33 55 99

7<sup>th</sup> August 2012

Our Ref: W0113-03/ap07db

Dear Mr Kyck,

I refer to the correspondence from Mr Kenneth Goodwin, Enviroco Management Environmental Consultants, on behalf of KMK Metals Recycling Ltd., dated 17<sup>th</sup> July 2012, received by the EPA on 20<sup>th</sup> July 2012, requesting Agency agreement for the noise monitoring proposal for 2012 at the licensed facility (Waste Licence Reg. No.W0113-03).

I am to inform you that the proposal submitted is to the satisfaction of the Agency. The Licensee should conduct the noise monitoring programme for 2012 as outlined in the aforementioned correspondence.

The Licensee is advised that noise monitoring should be carried out and reported in accordance with EPA Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4) 2012, which can be downloaded at the following web address:

<http://www.epa.ie/downloads/advice/noise/>

Please quote the above reference in future correspondence in relation to this matter.

Yours sincerely,

Dermot Burke, Inspector,  
Environmental Enforcement (Kilkenny),  
Office of Environmental Enforcement.

W0113-03\ap07db



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ENVIRONMENTAL CONSULTANTS  
LoCall 1890 522 000

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

17<sup>th</sup> July 2012

**KMK Metals Recycling Ltd (KMK) (Reg No. W0113-03) Acoustic Monitoring 2012**

Dear Mr Burke,

My client, KMK Metals Recycling Ltd (KMK Metals) have under condition 6.11.1 and Schedule B.4 and C.5 a responsibility to monitor and report boundary noise measurements on an annual basis. Schedule C.5 indicates the location of the said measurements, to comply with Map I.6.1 of the application submitted.

Due to the maturing of the KMK Metals site, I would like to propose, for the monitoring event to occur in September 2012, the following monitoring positions. This alteration to the existing Schedule C.5 will enable measurements to better reflect the existing site and to enable a report that is representative of the local environment.

If agreed this alteration will supersede the locations identified in Schedule C.5 for the 2012 noise monitoring event, as required under conditions 2.11.1 and Schedule B.4. All measurements will now be amended to reflect the most recent guidance notes by the EPA on noise monitoring of Scheduled Activities (NG4) released in April of this year. Table 1 below gives the amended monitoring locations for 2012 with the corresponding monitoring times as per NG4 document:



Table 1: Proposed Monitoring Durations as per NG4, at the KMK Facility in 2012.

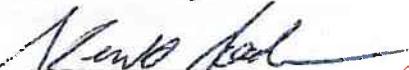
Station	Day				Night			
	1	2	3	Total	1	2	3	Total
NE1	30 min	30 min	30 min	1hr 30	15 min	15 min	N/A	30 min
NE2	30 min	30 min	30 min	1hr 30	15 min	15 min	N/A	30 min
NE3	30 min	30 min	30 min	1hr 30	15 min	15 min	N/A	30 min
NE4	30 min	30 min	30 min	1hr 30	15 min	15 min	N/A	30 min
<b>Total</b>	<b>6 hours</b>				<b>2hours</b>			

Attached map 'Site KMK Metals; Scale: 1:1100 at A4' shows the proposed noise monitoring stations for the event scheduled for September. These stations will enable a solid understanding of the existing noise arising from site activities at the boundaries of the KMK facility. The repeated measurements, as shown in table 1 will result in over 8 hours of monitoring data recorded for the site, significantly more than recommended under the NG4 document for day-time monitoring events.

The night-time monitoring is done for a repetition of each station twice as per the NG4 guidance. KMK only opens its doors after 6am and is shut down by 10pm. As such it is not possible to gain access to the monitoring stations for more than a 2 hour period of the EPA defined 'night-time' period (between 6am and 8am). The above procedure will result in a recording of the full extent of KMKs 'night-time' operations on the specific date, it is therefore perceived as more than adequate for reporting purposes.

If you have any questions on this, please do not hesitate to contact me on 057 93 52200.

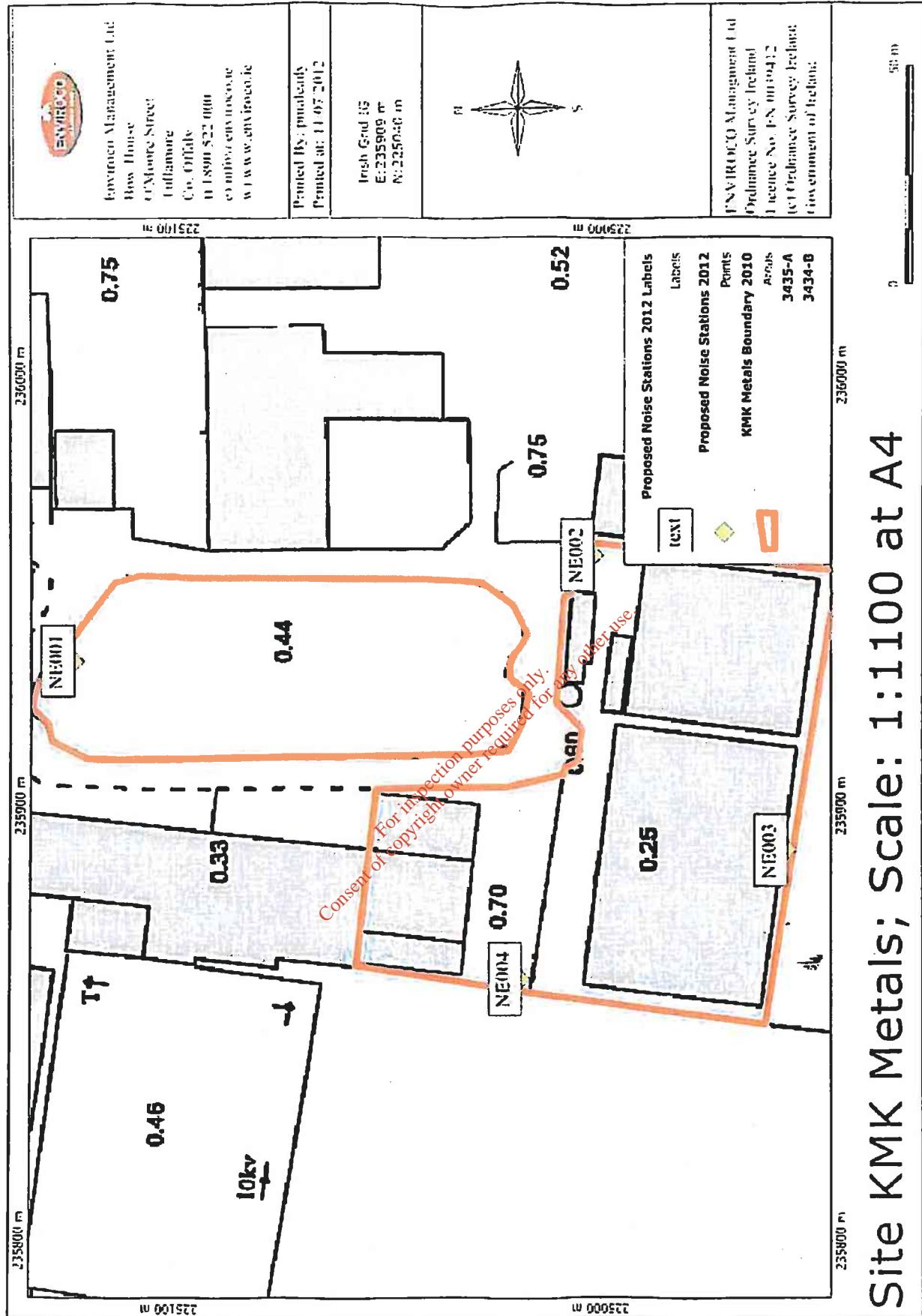
Yours Sincerely

  
Kenneth Goodyin, AMIOA, AIEMA

Environmental Consultant

Cc Charlotte Walker, KMK Metals Ltd, Cappincur industrial estate, Tullamore.

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Site KMK Metals; Scale: 1:1100 at A4

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# **Appendix 3**

**Drain Impact & Assimilative Report based on a Proposed Waste  
Water Treatment System (WWTS)**

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KMK  
July 2012

Drain Impact & Assimilative Report  
for a proposed new WWTS



**DRAIN IMPACT & ASSIMILATIVE REPORT  
BASED ON A PROPOSED WASTE WATER  
TREATMENT SYSTEM (WWTS)**  
**FOR**  
**KMK METALS RECYCLING LTD.**

AT

**CAPPINCUR INDUSTRIAL ESTATE,  
TULLAMORE, CO OFFALY**

**20<sup>th</sup> July 2012**

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Report prepared by;

**ENVIROCO Management Ltd.**  
Bow House,  
O'Moore Street  
Tullamore  
Tel : (057 93) 52200  
Fax : (057 93) 52342  
Website : [www.enviroco.ie](http://www.enviroco.ie)

KMK proposes to submit a planning application and EIS to Offaly County Council for their facility at Cappincur Industrial Estate, Tullamore, Co Offaly.

As part of this application and to address condition 4 of a previous grant of planning permission ref: 10/101 which states: '*The proposed new soil polishing filter shall be installed in accordance with the recommendations of the 2009 EPA Code of Practice 'Wastewater Treatment and Disposal Systems Serving Single Houses (P.E ,10)'. Setback distances shall be adhered to as far as reasonably practicable*' KMK has now appraised the situation fully. The three options available can be summarised as follows;

- 1) Purchase additional land space adjoining the existing percolation area, remove the existing percolation area and install a new area subject to the *2009 EPA Code of Practice*. This option was not viable to KMK due to land unavailability from the land owner and prohibitive costs.
- 2) Connect to the proposed foul sewer network once it is installed by Offaly County Council. This option was discounted due to a delay for several years for the foul sewer line to become available to users of Cappincur Industrial Estate.
- 3) The option to contain the domestic effluent in a holding tank for off-site removal to the County Council Wastewater Treatment plant was considered. However, this practise was discounted as unsustainable due to prohibitive costs and time incurred for liquid transport and associated treatment fees by the Council Plant over a number of years.
- 4) A final option was to upgrade the existing WWTS on-site taking into consideration best available technologies as alternatives to the standard percolation methods. After approaching two providers of WWTS, a full appraisal of the system proposed by Molly Precast was strongly considered as an appropriate method of treatment of effluent and associated wastes. This is considered the best option and is discussed further below.

The full details of the proposed WWTS are included in Appendix 1 and will involve the following key improvements;

- The existing tank will be modified for use as a primary holding chamber for domestic effluent storage and settlement.
- A new tank will be installed to be used as a buffering and reaction tank called a Sequencing Batch Reactor (SBR) including dosing for ortho-phosphate and total nitrogen removal. This secondary treatment process designed to reduce BOD, COD, solids and ammonia over an 8 hour batch cycle and prepare the effluent for sand filter treatment.
- The sand filter is a biological treatment process designed to further reduce the parameter loadings and ensure the final discharged effluent is acceptable for surface water.

This report is an investigation of the assimilative capacity of the receiving water (land drains) based on field work flow measurements and water quality of the same drain as determined from grab samples taken; up-stream and down stream of the proposed KMK discharge point associated with a newly proposed Waste Water Treatment System (WWTS).

The proposal also includes a full assessment of the new WWTS to be provided by Molloy Precast, Tullamore and its associated treated effluent discharge quality and volumes. It is proposed to discharge treated effluent from the up-graded WWTS to the land drain.

The land drain flow rate was measured on 20<sup>th</sup> June 2012 at three transects across the drain and are tabulated below:

**Table 1.0 – Flow rate field work June 2012**

Transect	Average Cross Sectional Area (m <sup>2</sup> )	Average Velocity (m/s)	Average Flow (m <sup>3</sup> /s)
A	0.19	0.013	0.0025
B	0.14	0.019	0.0027
C	0.16	0.018	0.0028
<b>Average</b>			<b>0.0026</b>

This assessment is to judge what the likely potential loading will be on the local land drain and the capacity for this drain to assimilate the chemical and biological components of the discharge. The following equation is utilised to calculate the current loading of the land drain from existing influents to the water body.

Existing loadings (kg) = flow x conc. of each parameter measured (mg/l) / 1000

The proposed treated effluent discharge point flow as determined from water metering installed at the KMK site is: 1,790 litres/day or 0.000021m<sup>3</sup>/s.

To calculate the existing chemical/biological parameter loadings the following equation is used:

Existing loadings (kg) = flow x conc. of each parameter measured (mg/l) / 1000

Water quality analysis was carried out on water samples taken at;

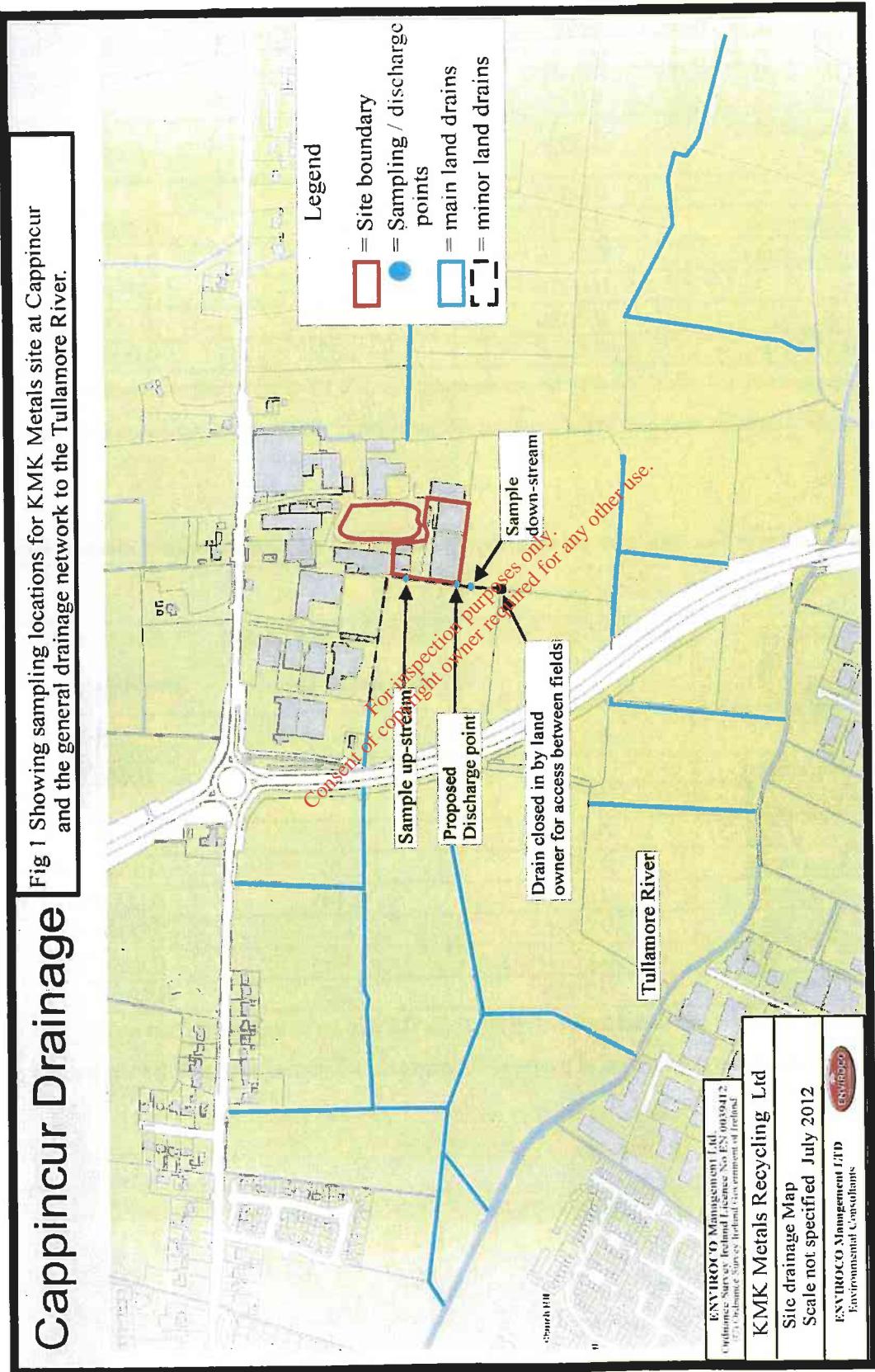
- Upstream of the proposed discharge point
- Down stream of the proposed discharge point

Please see map (Fig 1) attached for reference to sample locations and general drainage network of area.



## Cappincur Drainage

Fig 1 Showing sampling locations for KMK Metals site at Cappincur and the general drainage network to the Tullamore River.



**Table 1.1 shows the baseline parameter loadings for the land drain- Upstream (US) of the proposed discharge outlets (E Drain)**

Parameter	River Flow (m <sup>3</sup> /s)	US Concentration measured (mg/l)	Estimated loadings* (kg)
Total Suspended Solids	0.0026	70	0.00018
pH	0.0026	6.95	-
Total Ammonia	0.0026	0.28	0.0000007
Orthophosphate	0.0026	0.13	0.0000003
BOD	0.0026	14	0.000036
COD	0.0026	48	0.000125
Nitrate (NO <sub>3</sub> )	0.0026	1.33	0.0000034

\*Figures based the calculated flow rate of the drain: 0.0026 m<sup>3</sup>/s and using water quality analysis data taken upstream of the proposed discharge point. See Appendix 2 for analysis results

**Table 1.2 shows the baseline parameter loadings for the land drain- Downstream (DS) of the proposed discharge outlets (E Drain)**

Parameter	River Flow (m <sup>3</sup> /s)	DS Concentration measured (mg/l)	Estimated loadings* (kg)
Total Suspended Solids	0.0026	100	0.00026
pH	0.0026	6.98	-
Total Ammonia	0.0026	0.16	0.000004
Orthophosphate	0.0026	0.14	0.0000003
BOD	0.0026	11	0.0000286
COD	0.0026	49	0.0001274
Nitrate (NO <sub>3</sub> )	0.0026	0.25	0.00000065

\*Figures based the calculated flow rate of the drain: 0.0026 m<sup>3</sup>/s and using water quality analysis data taken downstream of the proposed discharge point. See Appendix 2 for analysis results

Table 1.3 shows the variation between upstream and downstream, including discharge values.

Parameter	Units	US	DS	US-DS
Total Suspended Solids	mg/l	70	100	+30.0
pH	pH units	6.95	6.98	+0.03
Total Ammonia	mg/l	0.28	0.16	-0.12
Orthophosphate	mg/l	0.13	0.14	+0.01
BOD	mg/l	14	11	-3.0
COD	mg/l	48	49	+1.0
Nitrate (NO <sub>3</sub> )	mg/l	1.33	0.25	-1.08

Positive results indicate an increase in the sample parameter from up-stream to downstream

Negative results indicate a decrease in the sample parameter from the up-stream to the downstream

The estimated parameter loadings from the upgraded wastewater treatment plant including after sand filtration is shown in table 1.4.

Table 1.4 – Potential loading impacts to the land drain

Parameter	Units	Proposed maximum parameters as discharged after sand filter (mg/l) <sup>note1</sup>	Dry Weather Flow Rate <sup>note2</sup> m <sup>3</sup> /s	Loading Kg
pH	Units		0.00002	
BOD	mg/l	5	0.00002	0.00000014
COD	mg/l	35	0.00002	0.0000007
Total solids	mg/l	4	0.00002	0.00000008
Phosphorous	mg/l	1	0.00002	0.00000002
Ammonia	mg/l	1	0.00002	0.00000002
Nitrates	mg/l	8	0.00002	0.00000016

Note1 = values taken from table on page 4 of Molloy Precast report in Appendix 2

Note2 = it should be noted that the final discharge to land drain will also include rainwater run-off from the building roof and rainwater soakage from the open area of the sand filter (during wet weather only).

This rainwater will increase the volume of discharge but will also dilute the overall discharged loading.

Average rainfall contribution is therefore estimated as:

$$1.2m \text{ (annual rainfall)} \times [95m^2 \text{ (sand filter area)} + 1,016m^2 \text{ (D-Hanger building area)}] / 365 =$$

$$3.65m^3/\text{day}$$

It is therefore necessary to show the comparison between the existing loadings on the land drain and the proposed loadings from the upgraded WWTS discharge point from KMK (represented in Table 1.5 below).

**Table 1.5 – Potential loading impacts to the land drain**

Parameter	Existing loadings (kg) downstream of discharge point	Proposed Loading from final discharge kg*	% increase in drain loading from discharge point
pH (units)	-	-	-
BOD (mg/l)	0.0000286	0.00000014	0.49
COD (mg/l)	0.0001274	0.0000007	0.55
Total solids (mg/l)	0.00026	0.0000008	0.31
Phosphorous (mg/l)	0.0000003	0.00000002	6.6
Ammonia (mg/l)	0.0000004	0.00000002	5
Nitrates (mg/l)	0.00000065	0.00000016	24.6

\* Figures based on 1,790 l/day being discharged from KMK WWTS process to the land drain over a typical day (10 hour working period) and using proposed effluent quality analysis data taken from Molloy Precast (the proposed WWTS provider). The proposed flow from KMK is 0.000021m<sup>3</sup>/s. See Appendix 2 for laboratory analysis results.

Similarly, when we take a ‘Mass Balance’ approach, the following is used:

This formula is used to calculate the concentration of a parameter in the receiving water i.e. land drain downstream of the discharge. This downstream concentration may then be compared directly with the water quality standard (EQS) to determine whether the discharge will cause an exceedance of the EQS value.

#### **Mass balance Equation:**

$$T = \frac{FC + fc}{F + f}$$

where:

- F is the river flow upstream of the discharge (usually 95%ile flow m<sup>3</sup>/sec);
- C is the concentration of pollutant in the river upstream of the discharge (mean concentration in mg/l);
- f is the flow of the discharge (m<sup>3</sup>/sec);
- c is the maximum concentration of pollutant in the discharge (mg/l);
- T is the concentration of pollutant downstream of the discharge.

Suspended solids is thus investigated and quantified in terms of its potential increase down stream as follows:

Suspended solids: 
$$T = \frac{0.182 + 0.00008}{0.0026 + 0.00002}$$

= 69.5

Ammonia is thus investigated and quantified in terms of its potential increase down stream as follows:

Ammonia : 
$$T = \frac{0.00073 + 0.00002}{0.0026 + 0.00002}$$

= 0.286

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## Discussion:

From the above results in tables 1.1, 1.2, 1.3, 1.4 and 1.5 and from the Mass Balance Equation calculations, we can see that there is a negligible reduction in the water quality of the land drain downstream of the proposed discharge point from KMK Metal's WWTS.

For example: the expected ammonia increase will only be 5% of the existing levels on the drain, the phosphorous levels will be increased by 6% and nitrates by 24%.

It is also important to consider that the receiving land drain flows through agricultural and industrial land prior to entering the Tullamore River. The entry point to the river is estimated at various points depending on land drain water levels.

Further reasons for the projected low impact to the Tullamore river from KMK are as follows;

- The discharge from the WWTS will be controlled and treated. The following treatment of discharge is carried out:
  - All domestic and associated effluent from the proposed up-graded WWTS is effectively treated by a primary, secondary and final biological process prior to entry to the land drain. This treatment process is described on page 2 previously and technical details are fully represented in the Molly Precast Environmental Solutions document in Appendix 1.
  - There will be a sampling chamber installed on the final outfall from the sand filter unit for sampling of treated effluent quality prior to linking with the roof water discharge pipe from D-Hanger building. This sampling point will provide monitoring of the discharge prior to dilution with rainwater during wet weather. The true dilution effect of the effluent discharge can be determined by sampling of the discharge pipe at the land drain during wet weather for comparison purposes.
  - There are no chemicals or other substances entering the WWTS and therefore precluded from entering the land drain.

- The receiving land drain flows through a myriad of other land drains prior to entry to the Tullamore River (refer to Fig 1 previously). This network of land drains will assist greatly in assimilation of the organic and other parameters prior to entry to the river. For example, vegetation growing in the land drains can utilise nutrients in water such as nitrogen and phosphorous. In addition, dilution effects of rainfall can also reduce the concentration of contaminants.

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## **APPENDIX 1**

### **MOLLOY PRECAST Environmental Solutions Proposed Waste Water Treatment Plant improvements**

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# MOLLOY PRECAST

## Environmental Solutions

Colerain, Clara Road, Tullamore, Co. Offaly.

Tel: 05793 26000 Fax: 05793 26060

Email: info@molloyprecast.com Web: [www.molloyprecast.com](http://www.molloyprecast.com)

## KMK Metals, Cappincar, Tullamore, Co. Offaly

### Proposed Waste Water Treatment plant improvements

#### Contents

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Proposed secondary treatment system components .....	3
Tests and approvals of the SBR system.....	4
How does a Sequential Batch Reactor system work .....	5
Site Specific adjustments.....	6
Tertiary Treatment Recommendations.....	6-7
Service period Recommendations.....	7
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#### Attached drawings:

Site plan

Proposed system

Proposed sand filter

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#### Attached by others: Final Site Layout Drawings

C.O. Niall Nally, Enviroco Management Services  
Bow House, O'Moore Street, Tullamore, Co. Offaly  
Phone: 087 1221422  
Email: nnally@enviroco.ie

Date: 17-07-2012

Date: 17<sup>th</sup> July 2012

**Re: Site Specific information for WWT system and sand filter for  
KMK Metals, Cappincar, Tullamore**

**Site relevant parameters:**

The site at KMK metals is small and very restricted, only a limited portion of land will be available for percolation. It is proposed to install Primary, Secondary and Tertiary treatment unit discharging to surface water.

The design criteria will be:

1. To achieve the level of treatment that is suitable for surface water discharge.
2. To have a system that is as automatic and as simple as possible to run.
3. To have a system that will have reasonable ongoing running costs.
4. To have a system that will require low external maintenance costs.
5. Regular in-house monitoring should be quick and simple.

**Estimated daily flow into the existing wastewater treatment plant is 1790 litres.**

**Calculated PE (Hydraulic Load@ 150l/person): 12 PE**  
**Calculated Organic Load: 1.44kg Equiv. 24PE**

On review of effluent quality results from Oldcastle (lab ref 217988), and with comparison of COD tests carried out in house, they seem to be somewhat accurate. The effluent from the existing system is very strong and further treatment will be required for dosing onto a sand filter.

Some items of concern include:

- High phosphorus content, this will require ferric chloride dosing, the combination of a secondary treatment unit and sand filter will not bring phosphorus levels down to desirable levels.
- Limited Carbon, we feel that the levels of Carbon in this system are not high enough to deal with the nutrient levels. For proper removal carbon dosing will be required.

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## **Proposed treatment system**

Aswaflo A1 10 - 20PE using *WISSMANN ELEKTRONIK GMBH* patented SBR *Clear Rex®* technology, certified tested to EN 12566-3, MFPA 4-50PE Cert No.B31.12.081.01.

The primary, buffer and treatment tanks are installed underground and will not give rise to any noise nuisance or any unpleasant odours once the system is correctly vented and maintained.

## **Proposed secondary treatment system components**

The proposed Aswaflo *Wastewater Treatment System* is a SBR (Sequencing Batch Reactor) mechanical aeration system designed to cater for 10 to 20PE (*population equivalent*).

The system will be programmed to specifically suit the calculated loads..

The following set-up will be applied:

- Installation of a 7000 litre tank divided into two equal compartments after the existing biocycle unit. The existing tank will operate as a basic primary tank for solid settlement. The first chamber of the new tank will act as a buffer, capable of buffering a day's influent. The second chamber will act as the reaction chamber.
- Installation of a SBR unit operating on a 12 hour cycle modified to include both ferric chloride and carbon dosing .
- Installation of a 2500 litre pump station to feed the previously designed sand filter. (Pumps sized specifically for the designed pipework layout)
- After commissioning, a check and testing is carried out at three months or by agreement.
- A local care taker will be trained and instructed in the operation and checks of the system, for efficient operation.
- Electrical requirements are: an independently 16A 220v supply.
- Kiosk with control panel installed with audible and visual alarms.
- **Yearly electrical power consumption will be < 1500 kWh for this site.**
- All tanks are installed under ground with low noise operation.
- No unacceptable odors will be present when the correct ventilation is installed.
- Recommended servicing periods, four times per year.
- Recommended minimum de-sludging frequency is once per year, or as the service engineer directs.
- During light load periods the system will revert to economy mode and holiday mode to reduce energy consumption to the minimum.

## Tests and approvals of the SBR system

- National Technical Approval, Germany Z-55.3-165 4-50PE Approval was based on independent testing done by the University Weimar, MFPA Weimar. Threshold tested values to DIN En 12566-3. Cert number MFPA 4-50PE cert No.B31.12.081.01.

**BOD<sub>5</sub>:** 11mg/l  
**COD:** 62mg/l  
**Settable solids:** 28 mg/l  
**NH<sub>4</sub>-N:** 5 mg/l  
**P :** <1.8 mg/l (with Ferric Chloride dosing)

A correctly constructed polishing filter or sand or soil can be expected to achieve final effluent results as follows. (See Tertiary treatment below)

Characteristics In mg/l	Prior to Treatment	Treated (SBR) 8 hour cycle	After Polishing Filter (or sand)
pH	7.5	7 – 7.5	7
B.O.D <sub>5</sub>	<300	< 11	< 5
C.O.D.	>400	< 62	< 35
Total Solids	>200	< 28	< 4
Phosphorous	<10	<2 (with chemical dosing)	
Ammonia (NH <sub>4</sub> -N)	>60	< 5	< 1
Nitrates NO <sub>3</sub> -N		<10	<8
Nitrites NO <sub>2</sub> -N		<1	<1

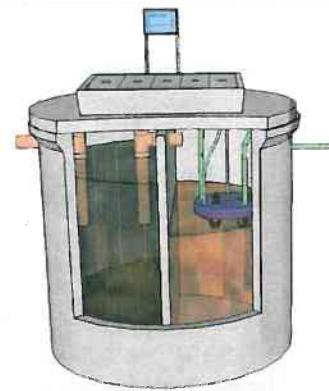
EPA manual Waste Water Treatment – Single houses – Small Communities. The achievement of these results is not guaranteed as the treatment achieved will depend on the soil and site conditions and good system operational and maintenance practice.

## How does a Sequential Batch Reactor system work

AswaFlow uses Sequence Batch Reactor technology to treat wastewater to the minimum standards set out by the EPA. An SBR system treats wastewater in a cycle of three phases namely **FILL**, **REACT**, **SETTLE** and **DISCHARGE**. The AswaFlow system repeats this cycle three times each day. The sewage treatment system is separated into three tanks, namely: Primary, Buffer and Treatment. Raw sewage enters the Primary Tank where it is stored; this in turn overflows into the Buffer Tank, where it is intermittently pumped into the Treatment Tank. The Primary Tank allows solids to settle under quiescent conditions. The purpose of the Buffer Tank is to collect and store wastewater while the Treatment tank is in a cycle. The Treatment tank treats the wastewater prior to discharge into the percolation system. The illustrations below are for a two chamber domestic system, however, the process is identical to the operation of the Buffer Tank and Treatment Tank of the commercial system.

### Fill

Sewage is transferred from the first chamber into the second chamber via a siphon pipe primed by the sludge pump. An equal amount of wastewater is transferred every time. If the required amount is not available within the first chamber the next phase (React) will not commence until the quantity of wastewater is available.



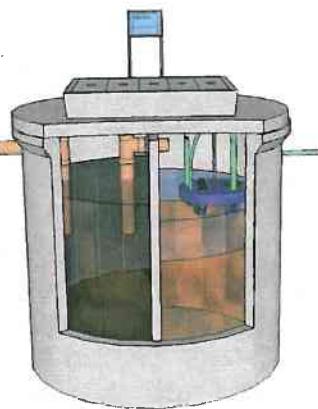
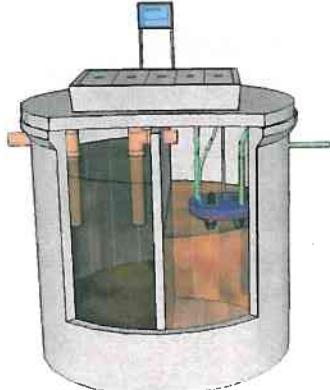
### React

The AswaFlow system uses bacteria already in the chamber to degrade the impurities within sewage. This is achieved by agitating the contents of the tank to mix the sewage with the existing contents of the chamber together. Oxygen is added using an aerator to allow the bacteria to thrive and efficiently remove the sewage's impurities. To prevent excessive amounts of sludge building up in the second chamber a small portion of sludge is intermittently pumped back to the first chamber using the sludge pump.

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### Settle

The React Phase finishes after a set period of time, all equipment is then switched off allowing the sludge and bacteria within the tank to settle out. This produces a clarified volume of water on the top of the chamber.



### Discharge

This phase removes the clarified volume of water. The clarified effluent is pumped to the percolation system using the clear water pump. The volume of water discharged is equal to the volume added in the fill phase and is controlled by a float switch.

## Site Specific Adjustments of SBR

The Aswaflow system is unique in that the cycle can be successfully adjusted to run a 6 hour, an 8 hour, a 12 hour or a 24 hour cycle. The system proposed for this development can buffer 100% of the days calculated output of waste water at the beginning of a cycle.

MOLLOY PRECAST LTD. fully guarantees the *Aswaflow Wastewater Treatment System* as suitable for the development in question. The system must be installed according to the manufacturer's specific instructions and commissioned by trained personnel. To ensure the efficient treatment and disposal of the domestic wastewater, we recommend the following:

- **NO RAINWATER, SURFACE WATER etc., should be discharged to the treatment system.**
- Only domestic wastewater, which includes all effluent from the kitchen, toilets, bathroom, showers, appliances, should be discharged to the treatment system.
- **N.B. Urinals and any other automatically flushing apparatus should be economy type and only operate during the occupied time. (A water meter should be fitted to the main supply for regular checking to determine there is no unnecessary waste.)**

## Type of Tertiary Treatment - Intermittent Sand Filter

Intermittent sand filters use unsaturated aerobic conditions to effectively treat wastewater. Sand filters consist of a number of beds of graded sand 700-900mm deep in total underlain by a 200mm thick gravel layer to prevent outwash or piping of the sand as per fig.8.5 p31 of EPA CoP 2009. Sand filters can have good phosphorus removal attributes however this is entirely dependent on the sands mineralogy and phosphorus removal is finite. The sand filter should be constructed in the following way as per section 8, EPA CoP, 2009.

- The sand filter for this project should be 95 m<sup>2</sup> in size.
- The recommended dosing rate is 40 lit per m<sup>2</sup> per day.
- This filter is best finished on top with gravel for better Oxygen uptake, monitoring and maintenance. (A minimum of soil cover for, grass growth, can be used effectively.)
- Wastewater should be distributed evenly throughout the sand filter using a pressured pipe network.
- The sand filter should be vented appropriately
- The sand filter should be sealed on the sides to prevent side flows.
- Construct the Sand Filter as per the attached drawing.

- Discharge is collected and diverted away from site.
- Place the 4" perforated ventilation pipes in place with the non perforated vertical vent shafts supported as required as per the supplied construction drawings.
- Place the side sealing impermeable membrane in place.
- Since the side sealing impermeable membrane must extend to the full height of the sand filter fold the excess back over the clay while the bottom layers of the sand filter are being assembled with the vent pipes also being positioned at this time.
- Continue building the clay bank to enclose the sand filter in stages insuring that the sealing side sealing membrane is kept in place.
- Place the sand filter media in layers, exactly as shown in the drawing, the fine filter sand must be correctly graded and certified for the Cu D<sub>60</sub>/D<sub>10</sub> <4 requirement as per EPA recommendations. (To insure that the Sand Filter reaches its design life of >25 years the Cu should be <2)
- Place the pressurized distribution pipes in place as per the drawing with holes pointing downwards and pipes sloped away from the manifold at a gradient of about 1:200
- Cover the distribution pipes with a little more stone and a membrane to prevent weed growth.
- The pipe system should drain down after dosing to insure frost protection.
- A degree of skill and experience is required to construct a Sand Filter successfully. The attached generic drawing should be studied for guidance only, consult Molloy Precast for specific details.
- Ensure that the contractor is familiar with Sand Filter construction and has a level of skill and experience required to construct the filter correctly.

### Servicing

Servicing is carried out by Molloy Precast Products Ltd. trained personnel. It is recommended that this system is serviced four times a year and monitored by a caretaker weekly.

Please contact me should you require any additional information.

Yours sincerely,



Shane Fox

Civil Engineer  
Molloy Precast Products Ltd



Site ID:tba.

**Maintenance Contract Agreement:**  
**Aswaflo Wastewater Treatment System For 10-20 PE**

**For: Management**

**At: KMK Metals, Cappincur, Tullamore, Co. Offaly**

**Contact phone numbers:** Tel:..... Fax: .....

MOLLOY PRECAST LTD. undertakes to service the system as follows:

- Visual inspection and servicing off all components of the Aswaflo system and a complete check of the Pumping Station pumps and the Sand Filter condition.
- Efficiency testing of the system on the following core parameters:
  - Sludge level in the primary settlement tank (to determine de-sludging frequency)
  - Sequential batch reactor(SBR) sludge volume check (Settled Sludge Volume – SSV<sub>30</sub>)
  - System test run through the control panel and check alarm log
  - Adjustment of system settings on the control panel where necessary
  - Issue a maintenance report of tests when completed

**Service charge:** €350 inc. VAT payable in advance, for each service call.

Payable in advance. Renewable yearly. Call out charges are at our standard rates plus parts and mileage. Equipment under warranty is dependent on Molloy Precast Ltd. servicing the system as advised. As a minimum the system should be serviced annually. (This service contract applies only to the treatment system and does not extent to the pipe work outside of the tank area. Toilet and pipe blockages or percolation areas are not covered.)

First Service Call due after : TBA

Second Service call due after : ... .....

Third Service call due after : ... .....

**Optional Laboratory testing of effluent on request.**

*It is advisable to avoid excessive use of detergents and household cleaning agents and to use the phosphate free alternative products.*

**Disclaimer:** Molloy Precast Ltd. cannot take responsibility for the effluent quality as the treatment achieved will depend on household input, good system operation and maintenance. Molloy Precast Ltd cannot take responsibility for equipment damage owing to flooding/unfavourable site conditions.

Signed: .....  
(for - MOLLOY PRECAST LTD. Ltd.)

Signed: .....  
(for Customer/Client)

Position: Civil Engineer  
Date: 17<sup>th</sup> July 2012

Date: -----



(Prices Valid 2011 – VAT @ 13.5% - See terms & conditions)

### Maintenance Contract Terms & Conditions

- Molloy Precast Products Ltd. trained service personnel will conduct the servicing of the designated Sewage Treatment System in a safe and efficient manner in accordance with Molloy Precast Products Ltd. Safety Statement.
  - The site Occupier / Owner will insure that the site is accessible and safe.
  - This contract does not bind Molloy Precast Products Ltd. to effluent quality, however every effort will be made to advise the occupier and to make any adjustments to the plant that will ensure the best possible effluent quality.
1. The occupier should insure that all manholes pertaining to the sewage treatment system are accessible.
  2. Access to the control panel is also required. ( If access to the control panel is not available at the time of a service call, the service will proceed without that component of the service.)
  3. Access to a water tap is needed to clean components during servicing.
  4. It is advisable that children and pets are not present in the vicinity of the sewage treatment tanks during servicing. (Open manholes present a significant risk of injury or drowning in the deep tanks.)
- The Service visit includes the items and visits that are paid for and indicated on the maintenance contract only.
  - Replacement, broken or unserviceable parts will be charged for at cost.
  - Breakdowns, alarms, etc. requiring call out, are subject to the charges below.
  - Note: This maintenance contract only covers the treatment system. It does not extend to any foul sewer pipe work or blockages or house fittings external to the treatment system. It does not cover any problems relating to percolation or soak-aways.
  - A call out request, that occurs close to a due service call date, may be combined with the service by mutual agreement.

Failure to have the system serviced, on an annual basis, will invalidate any current warranty after the first 12 months of operation.

Call out costs are: €100 per visit plus mileage @ €1.20 per mile from Tullamore and €40 per hour for every hour after the first hour, all plus VAT at 13.5%.

Access and mutually acceptable times must be arranged beforehand. No access at the time of an arranged call will incur the full callout charge.

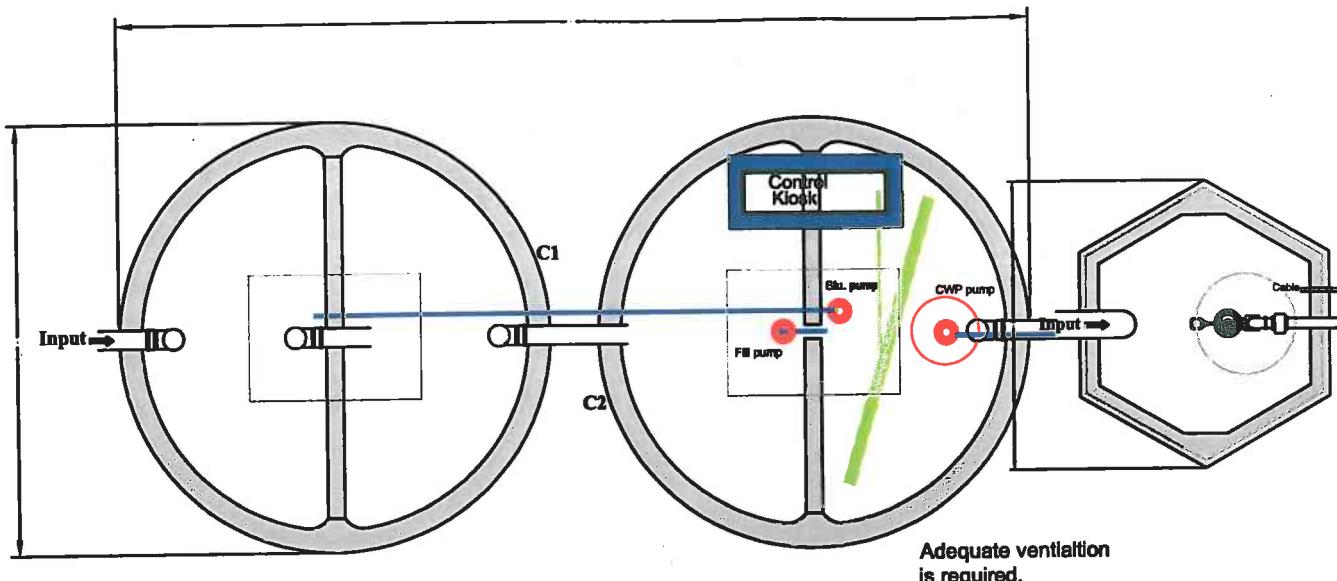
Please mark the services required on the signed document and return to Molloy Precast with payment & VAT for the required services. The counter-signed document will be returned with a receipt.

(Prices Valid 2011– VAT @ 13.5% )

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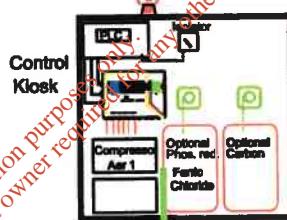
# 4-20 PE Wastewater Treatment System - 2S+ Tanks (14,000 L)

## with 2500 litre pump station

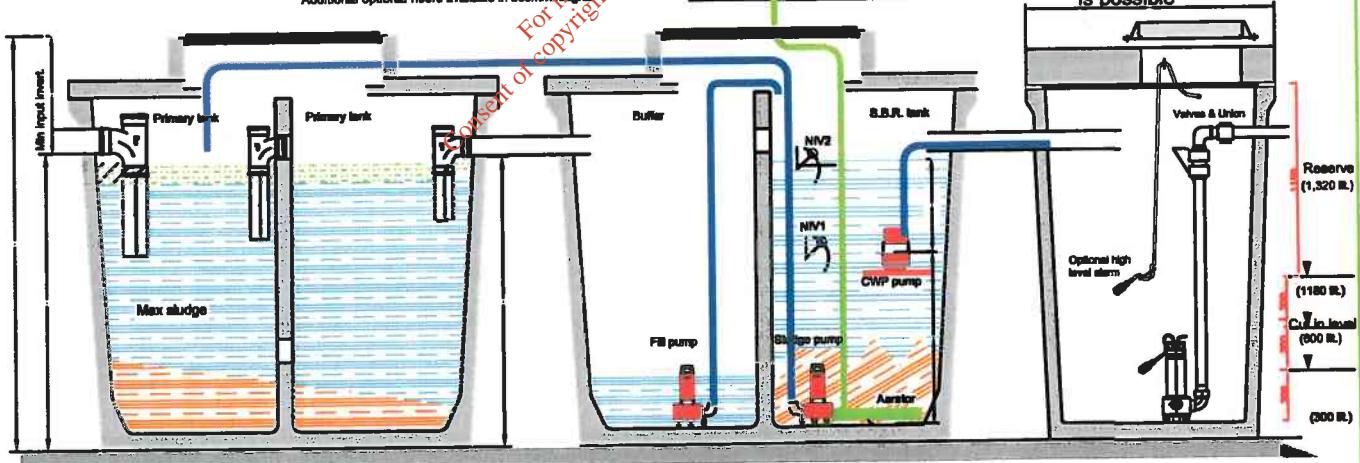


Input 110mm or 160mm

Additional optional risers available in 300mm height



Connection to percolation area must insure that no runback is possible



A good firm, rock free, level base is required.  
Where ground is unsuitable, a C30 concrete base may be required.

Clara Road, Tullamore, Co. Offaly, Ireland  
Tel: 057 9326060 info@molloyprecast.com  
Fax: 057 9326060 www.molloyprecast.com

Note: Observe all safety regulations in regard to excavation and lifting requirements. Never leave opening uncovered or unattended at any time.  
Note: Specify any specific requirements prior to ordering. All civil works by customer.  
Note: Do not scale from this drawing. Only for illustration purposes.

Tank Type: 2S+H+  
Tank Size: 5440mm x 2570mm (Overall)  
Height: 2480mm (Each)  
Volume: 14000 litres (7000 litres Each)  
Weight: 7100 kg (Each)  
(Tank Dim: ± 20mm. Weight: ± 30Kg.)

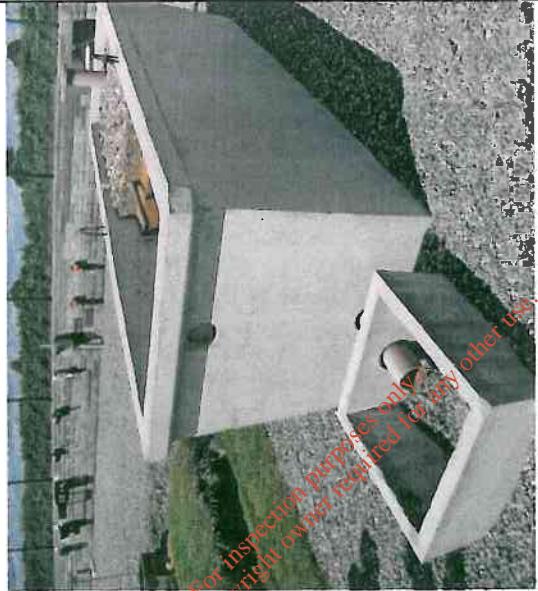
Title: Asweflow Treatment System - 2S+  
Population Equivalant: 4-20 PE  
Date: June 2012  
Drg. No.: WWT-2S+H+-20PE-00  
Drawn By: SF  
This drawing is ©. All rights reserved.

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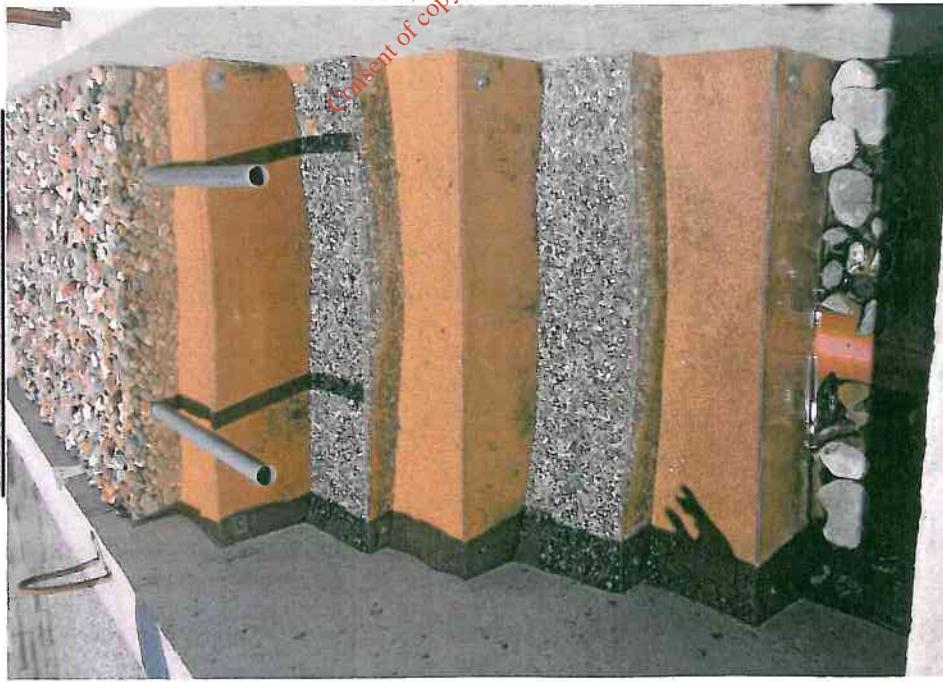


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View of sand filter

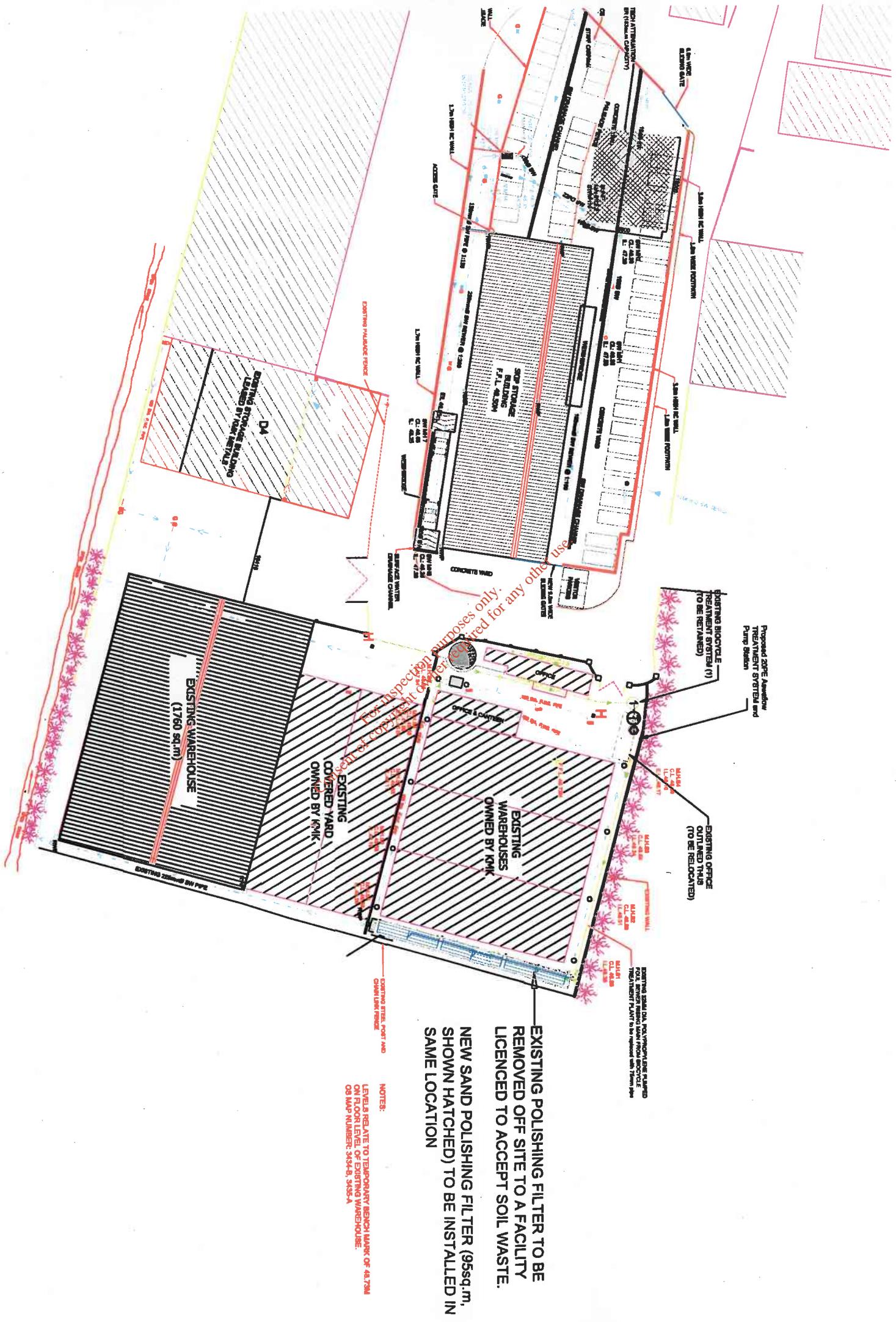


Cross sections of sand filter



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**APPENDIX 2**

**LABORATORY ANALYSIS DATA**

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# TEST REPORT

Analysing  
Testing  
Consulting  
Calibrating



**Client:** Enviroco Management Ltd  
 Bow House  
 O'Moore St  
 Tullamore  
 Co.Offaly

**FTAO:** Kenneth Goodwin

**BHP Ref. No.:** 104541

**Order No:**

**Date Received:** 21/06/12

BHP

**Date Completed:** 04/07/12

New Road

**Test Specification:** Nil

Thomondgate

**Item :** See below

Limerick

Ireland

Tel +353 61 455399

Fax + 353 61 455447

E Mail bhpclm2@bhp.ie

TEST	Client Reference	Units	Results	Method
Total Suspended Solids	LD US	mg/l	70	APHA - 2540 -D
pH		-	6.95	APHA - 4500 - H <sup>+</sup> - B
Total Ammonium (as N)		mg/l	0.28	APHA-4500-NH <sub>3</sub> -D
OrthoPhosphate (as PO <sub>4</sub> )		mg/l	0.13	APHA - 4500 - P-E
BOD		mg/l	14	APHA - 5210 - B
COD		mg/l	48	APHA - 5220 - D
Nitrate (as NO <sub>3</sub> )		mg/l	1.33	APHA - 4110 - B
Total Suspended Solids	LD DS	mg/l	100	APHA - 2540 -D
pH		-	6.98	APHA - 4500 - H <sup>+</sup> - B
Total Ammonium (as N)		mg/l	0.16	APHA-4500-NH <sub>3</sub> -D
OrthoPhosphate (as PO <sub>4</sub> )		mg/l	0.14	APHA - 4500 - P-E
BOD		mg/l	11	APHA - 5210 - B
COD		mg/l	49	APHA - 5220 - D
Nitrate (as NO <sub>3</sub> )		mg/l	0.25	APHA - 4110 - B

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**Additional Information:**

All methods are from Standard Methods for the Examination of Water and Wastewater 20th Edition.

**Authorised by:**

**Pat O' Sullivan**  
**Chemical and Environmental Monitoring Laboratory**  
**Environmental Site Manager**

**Date of Issue:** 04th July 2012

Test results relate only to this/these items. This test report shall not be duplicated in full without the permission of the test laboratory.

