NALLY ENVIRONMENTAL

Environmental
& Waste Management
Consultancy

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

8th May 2013

RE: KMK Metals Recycling Ltd. (KMK)
Waste licence ref: W0113-04
Article 16(1) of the Waste Management (Licensing) Regulations

Dear Mr Meaney,

Further to your letter dated 18th April 2013, I now on behalf of KMK wish to respond directly to all items raised in the following order;

Article 16(1)- Further information, particulars and evidence

1. *With regard to the request to authorise the proposed new air emissions points at E area and A/B/C area, further information is required. In the first instance, and to provide a basis for considering the authorisation of these proposed emissions, please complete the appropriate tables (E.2(ii) to (iv)) of the waste licence application form in relation to each proposed emission point.*

KMK response;

KMK are only considering potential air emission points at E area and possibly A/B/C area on the basis of waste processing activities increasing into the future. Therefore, should WEEE treatment (e.g. shredding, dismantling, specialist disassembly) be deemed necessary at E building or indeed inside A/B/C buildings, then KMK wishes to have a formal pre-authorisation in place with the EPA for associated emission points, i.e. one emission point at E area reference A2-9 and one emission point at A/B/C area referenced A2-10 to be conditional with the new waste license. This pre-authorisation of the emission points will obviously be subject to formal agreement with the EPA prior to installation and commissioning. During the formal agreement stages, KMK will then have exact details necessary in terms of emission point locations, sources, abatement etc for the EPA to make their decision.
Furthermore, the emission point tables E.1(ii) to E.1(iv) will be completed at that stage for determination and final agreement by the EPA.

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The purpose of this request for pre-authorisation of emission points is that KMK does not wish to enter into another Waste Licence Review application should a minor or indeed major emission point be sought for the site. It must be stated that the business area of WEEE waste management is fluid and ever changing. Therefore, progressive companies such as KMK need to be able to adapt new technologies using relevant BAT in a timely manner in order to maximise WEEE recovery and remain competitive within the industry.

2. *It is apparent from available monitoring results at the existing emission point A2-8 that the mass emissions of arsenic, cadmium, chromium, mercury, nickel and lead exceed 20% of mass flow thresholds for these parameters expressed in the BAT guidance note/or the surface treatment of metals and plastic materials and/or BAT guidance note for non ferrous metals and galvanising. This means that the emission at A2-8 cannot be regarded as a minor emission. Please provide a quantificationof the environmental impact of the emission from A2-8 in accordance with the Agency guidance document Air Dispersion Modelling from Industrial Installations Guidance Note (AG4) to demonstrate that emissions will not result in relevant air quality standards being exceeded. The analysis/model should be carried out on the following basis:*

   - *at A2-8 alone, and*
   - *A2-8 in combination with any proposed emissions points.*

   It may be appropriate to use a screening model first to establish whether the emissions should be analysed using an advanced air dispersion model and any decision to rely solely on a screening model should be justified. The model report should clearly identify the volumetric flow rates and emission levels (concentrations) modelled at each emission point. The impact of the parameters mentioned above, as well as the following parameters, should he considered: particulates/dust, thallium, aluminium, zinc.

KMK response;

KMK acknowledges the EPA comments above. However, KMK does not engage in any metallurgical process on-site. The WEEE treatment is physical only with no chemicals or heat treatment used. We therefore consider that the EPA's use of *BAT guidance note/or the surface treatment of metals and plastic materials and/or BAT guidance note for non ferrous metals and galvanising,* is not appropriate for KMK's activities. KMK requests a justification or reasoning from the EPA to support their use of these BAT guidelines. Similarly, KMK requests the calculations used by the EPA to support their statement '*It is apparent from available monitoring results at the existing emission point A2-8 that the mass emissions of arsenic, cadmium, chromium, mercury, nickel*

and lead exceed 20% of mass flow thresholds for these parameters...'. KMK also wishes to point out that they have invested significantly in order to mitigate all air emissions from their WEEE treatment process on-site and to date all total particulate results for A2-8 are below the ELVs specified in their licence.

3. *In relation to the proposal to discharge treated sanitary eft1uent to the land drain to the south and outside of the facility:*

   a) *Justify the use of the Code of Practice for Wastewater Treatment and Disposal Systems Serving Single Houses (p.e. < 10) as the appropriate guidance to follow for waste water treatment systems for a staff complement of 40 or more at KMK Metals.*

KMK response;

Please refer to the EPA Manual for Small Communities, Business, Leisure Centres and Hotels 1999 Table 3. Page 8, copy attached below courtesy of Molloy Precast Products Ltd.

The table establishes the average waste water usage and organic loading for workers. Therefore, by dividing that total hydraulic figure by 150 the equivalent figure in PE is established. The total organic figure is divided by 60 to establish the equivalent Organic PE. These equivalent figures were used to identify a suitable treatment unit. The final polishing and percolation is established by reference to the EPS CoP 2009 manual and clarifications 2012.

MOLLOY PER CAST PRODUCTS LTD.,
Coleraine, Clara Road, Tullamore, Co. Offaly.
Tel: 05793 26000 Fax: 05793 2606(
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Commercial, Industrial & Leisure Premises (wastewater loading rates

EPA manual for Small Communities, Business, Leisure Centres and Hotels. 1999 Table 3. page 8.

Situation	Source	Litres/day person	BOD_5 g/d person	PE Organic loading equiv.	Number of Persons
Domestic	Normal residential	180	60	1.00	
Industrial	Office and/or factory without canteen	30	20	0.33	40
(Urinals must	Office and/or factory with canteen	60	30	0.50	
be economy type)	Open industrial site, e.g. quarry - canteen	40	25	0.42	
Schools	Non-residential with cooking on-site. Students	60	30	0.50	
(6Hr. shock load)	Non-residential with no canteen. Students	40	20	0.33	
(Urinals must	Boarding school residents	180	60	1.00	
be economy type)	School day staff	60	30	0.50	
Hotels	Guests (including meals)	250	75	1.25	
(Urinals must	Guests (no meals)	180	45	0.75	
be economy type)	Resident staff	180	60	1.00	
	Day staff	60	30	0.50	
	Conference	40	20	0.33	
Restaurants	luxury catering (Meals)	25	25	0.42	
(Urinals must	prepared catering (Meals)	15	15	0.25	
be economy type)	snack bar (Meals)	10	10	0.17	
	Function rooms inc buffets	10	10	0.17	
	fast food (Meals)	10	10	0.17	
Pubs and clubs	Residents	200	60	1.00	
(Urinals must	Day staff	60	30	0.50	
be economy type)	Bar drinkers	10	10	0.17	
	Bar meals	10	10	0.17	
Football Clubs	Players inc showers	30	20	0.33	
(Urinals eco only)	Spectators - Toilet blocks (per use)	8	10	0.17	
Amenity sites	Restaurants	15	15	0.25	
	Function rooms	10	10	0.17	
(Urinals must	Toilet blocks (per use)	8	10	0.17	
be economy type)	Toilet blocks (long stay car park)	10	15	0.25	
	Golf clubs (Players inc. showers)	25	15	0.25	
	Squash, with club house	25	15	0.25	
	Swimming	10	10	0.17	
Caravan sites	Touring	50	35	0.58	
(Urinals must	Static not serviced	75	35	0.58	
be economy type)	Static fully serviced	150	55	0.92	
	Tent sites	50	35	0.58	
Hospitals	Residential elderly people	250	60	1.00	
	Residential elderly people plus nursing	300	65	1.08	
	Nursing homes (convalescent)	350	75	1.25	

Planned commercial peak usage calculation for -
KMK Metals, Cappincar, Tullamore, Co. Offaly

C/O Miall McNally
Nallly Enviormental

Industrial complex with 40 workers

Total organic loading per day in gr.	800.00
Total Hydraulic load, litres per day	1200.00
Total PE at normal organic load BOD_5 (60mg/l/day/PE)	13.33
Total PE at normal hydraulic output (150 lit./day/PE)	8.00

Recommended System :

Aswaflow A1 10-20PE treatment system

Trenches @ 50 lit. @ per m^2 = m	48.00
Trenches @ 25 lit. @ per m^2 = m	96.00
Percolation @ 20 lit. per m^2	60.00
Percolation @ 10 lit. per m^2	120.00
Percolation @ 5 lit. per m^2	240.00
Percolation @ 3 lit. per m^2	400.00
Sand Filter @ 40 lit. per m^2	30.00

b) *Regarding the measured flow rates in the land drain (June 2012), state whether the flow is a low or high flow in the context of the land drain. Describe the rainfall in the period leading up the measurements. If possible, provide an estimate of the 95%ile (i.e. low) flow in the land drain.*

KMK response;

The flow rates in the land drain were monitored on the 20th June 2012 at three transect locations across the drain. The width of the land drain varied from between 1.8 to 1.85m and the depth of water from surface to bottom in the land drain varied between 0.40m to 0.65m.
In the context of the land drain, the flow measured on the day can be considered a relatively high flow. The rainfall leading up to the measurements was quite consistent with June 2012 being the wettest month of the year based on rainfall statistics for Gurteen and Mullingar Met Eireann stations (detailed below). It was determined appropriate to get a good flow therefore at that time.

Monthly values for Gurteen up to 24-apr-2013
Total rainfall in millimetres for Gurteen

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2013	88.2	39.7	35.8	52.5									216.2
2012	94.2	32.2	28.7	80.4	49.6	199.7	132.2	103.0	56.8	119.5	77.1	88.2	1061.6
mean	96.4	66.2	74.5	59.8	68.0	71.8	66.7	84.9	74.8	103.8	89.8	91.5	948.2

Monthly values for Mullingar up to 24-apr-2013
Total rainfall in millimetres for Mullingar

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2013	117.8	54.8	40.1	63.5									276.2
2012	97.4	42.4	15.4	75.4	55.1	175.1	122.1	128.9	62.0	90.9	68.3	91.2	1024.2
mean	92.5	70.3	76.6	65.9	69.2	73.8	71.1	86.1	78.3	104.3	88.1	94.7	970.9

In terms of 95%ile estimates on the land drain, this is not possible with the data available.

c) *State what pathogen count is expected in the effluent and whether additional treatment is envisaged or appropriate to further reduce pathogen emissions.*

KMK response;

In the context of pathogen counts in the expected final effluent, we refer to the study report, *'An Investigation into the Performance of Subsoils and Stratified Sand Filters for the Treatment of Wastewater from On-site Systems (2001-MS-15-M1)' Synthesis Report (Main Report available for download on* ***www.epa.ie/EnvironmentalResearch/ReportsOutputs)***. This report was prepared under the Environmental RTDI Programme 2000–2006.

On page 36 of the said report, it quotes *'Table 7.10 shows that viable concentrations were found throughout the depth of the sand filter at both loading rates and that the filter only affected a 1 log reduction in the enteric bacteria from the typically low*

concentrations in the secondary effluent (SE). However, no viable E. coli concentrations were sampled beneath the sand filter at either loading rate'.

Please refer to the Table extract below for clarification of data;

Table 7.10. *E. coli* concentrations in sand filter and subsoil (Site 4). Note: figures in parentheses indicate values during high loading trial.

	Number of samples	Number of samples with concentration (cfu/100 ml)			
		<10	10–100	101–1000	>1000
SE	2 (1)		1 (1)	1	
Coarse sand (depth 0.3 m)	2 (1)		1 (1)	1	
Medium sand (depth 0.475 m)	2 (1)		2 (1)		
Fine sand (depth 0.75 m)	2 (1)		2 (1)		
Subsoil (depth 1.3 m)	2 (1)	2 (1)			
Subsoil (depth 1.6 m)	2 (1)	2 (1)			
Subsoil (depth 1.9 m)	2 (1)	2 (1)			

In terms of additional treatment of pathogens, this is not envisaged at this stage. The reason being that a properly constructed sand polishing filter, facilitating an even distribution of receiving secondary effluent across the sand filter layers for percolation, will encourage the production of a biomat for bacterial treatment. This biomat will be an essential part of the efficient working of the sand polishing filter unit. Regular maintenance of the unit will also be key to its sustainable function.

Therefore, the combination of Primary, Secondary and Sand Filter Tertiary treatment eliminates any threat from human form coliform bacteria. To support this, we refer to EPA STRVE 2007-2013 report series no 28, research titled 'On-site Wastewater Treatment: Investigation of Rapid Percolating Subsoils, Reed beds and Effluent Distribution'.

4. *State whether KMK Metals stores metallic mercury as defined in Regulation (EC) No 1102/200/S. State whether the company has any obligations or liabilities under Regulation No 1102/2008 or the European Communities Mercury (Export Ban and Safe Storage) Regulations 2012 (S.I. No. 27 of 2012).*

KMK response;

KMK does not accept, store, or handle waste mercury as defined in Article 2 of Regulation (EC) No 1102/2008.

In terms of any obligations or liabilities under Regulation No 1102/2008 or the European Communities Mercury (Export Ban and Safe Storage) Regulations 2012 (S.I. No. 27 of 2012);

KMK does not export mercury or mixtures of metallic mercury with other substances, including alloys of mercury, with a mercury concentration of at least 95 % weight by

weight (in accordance with Article 1 of Regulation (EC) No 1102/2008); KMK does not receive nor generate material with a mercury concentration of at least 95 % weight by weight.

KMK supports the identification, isolation, and removal of mercury from the environment by inspecting WEEE for Mercury Switches, for example, and where Mercury is found KMK removes components (intact) and stores the entire component in a suitable water-tight lidded and labelled drum, in KMK's quarantine area, for disposal by a licenced / permitted company (Indaver, Belgium). This material is sent for recycling by Indaver in Belgium, who are equipped for the removal of mercury, and for mercury disposal – therefore assisting with the objectives of Regulation (EC) No 1102/2008 which is to protect health and the environment, and prevent metallic mercury from re-entering the market.

KMK collects and manages Gas Discharge Lamps (GDL's). Containers of GDL's are not opened by KMK; there is no handling of individual lamps and the lamps are not subject to any sorting or treatment activity at KMK - they are sent for recycling / recovery of glass and metals by a permitted waste management company in Ireland.

The proposed new system for removal of backlights from Flat Panel Displays (FPD's) operates in a fully enclosed environment under negative pressure, is fully automated, and is equipped with appropriate technology for effective mercury capture (carbon filtration). The glass fraction (backlights) removed by this process will contain most of the mercury and this will be sent for suitable recycling / recovery / disposal as applicable (the material will not be greater than 95% weight by weight mercury and therefore falls outside of the scope of Regulation (EC) No 1102/2008.

Whilst the export of glass arising from KMKs new proposed FPD process does fall within the scope of Regulation (EC) No 1102/2008, the objectives of the regulation are complied with by KMK for (a) protection of the environment (b) health and safety reasons (c) prevention of mercury from re-entering the market.

I also enclose the revised non-technical summary (application form and EIS) as requested in your note and 16CD-ROM pdf copies of the same information.

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

Yours Sincerely,

Niall Nally

Niall Nally
Senior Environmental Consultant
Cc Kurt M Kyck, KMK Metals Ltd, Cappincur Industrial Estate, Tullamore, Co Offaly.

ATTACHMENT A
NON TECHNICAL SUMMARY
REVISED 07-05-2013 FOR W0113-04

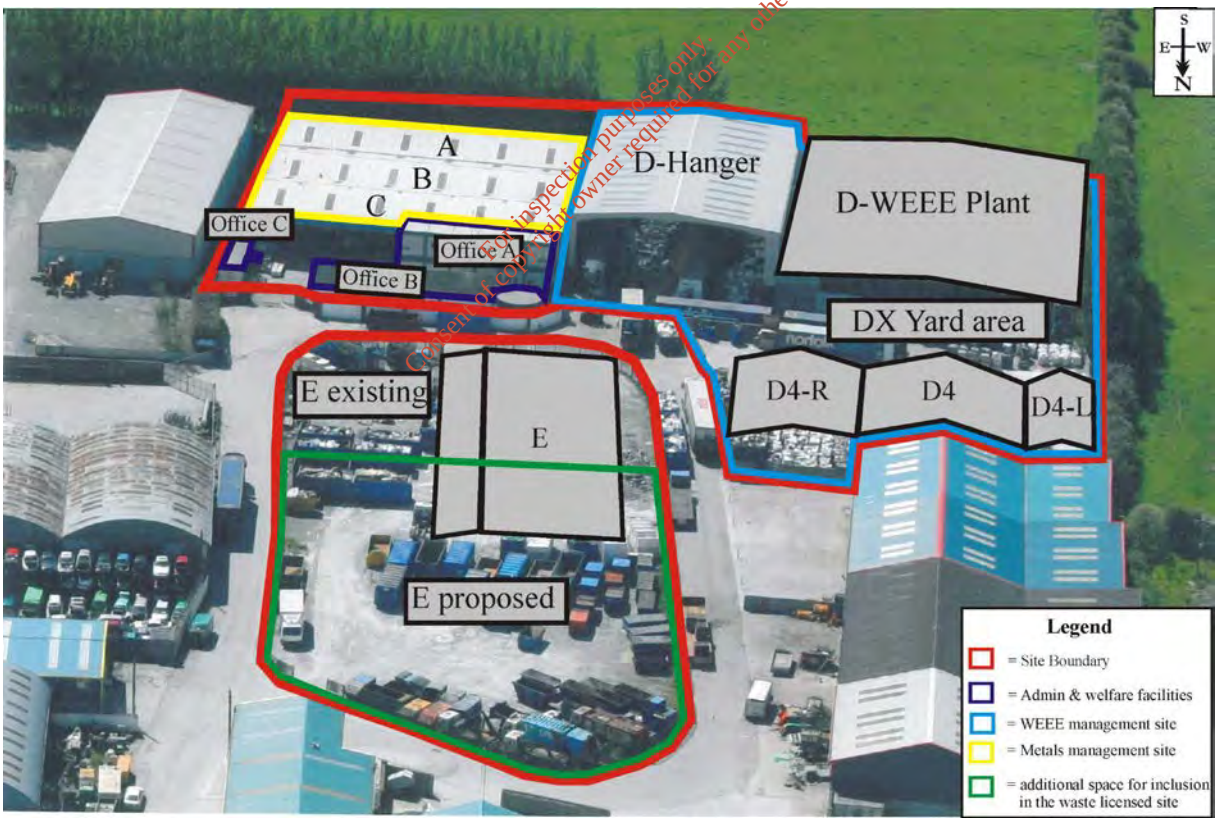
General Description of the proposed development:

The KMK Metals Recycling Ltd facility is located in Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly (Grid Ref: E635890 N725043) and illustrated on the locations maps; Map A and Map A.1 (previously submitted in the waste licence review application). The facility operates as a hazardous and non-hazardous metals waste transfer station specialising in metallic and WEEE wastes.

It is the intention of KMK Metals Recycling Ltd to incorporate the remaining land area beside the existing E yard and to increase the permitted annual tonnage for waste acceptance at the facility from 20,000tonnes to a maximum of 35,000tonnes into the remit of the existing waste license ref: W0113-03. The proposed additional waste tonnage is to be the same wastes in type and description to that currently acceptable in the waste license.

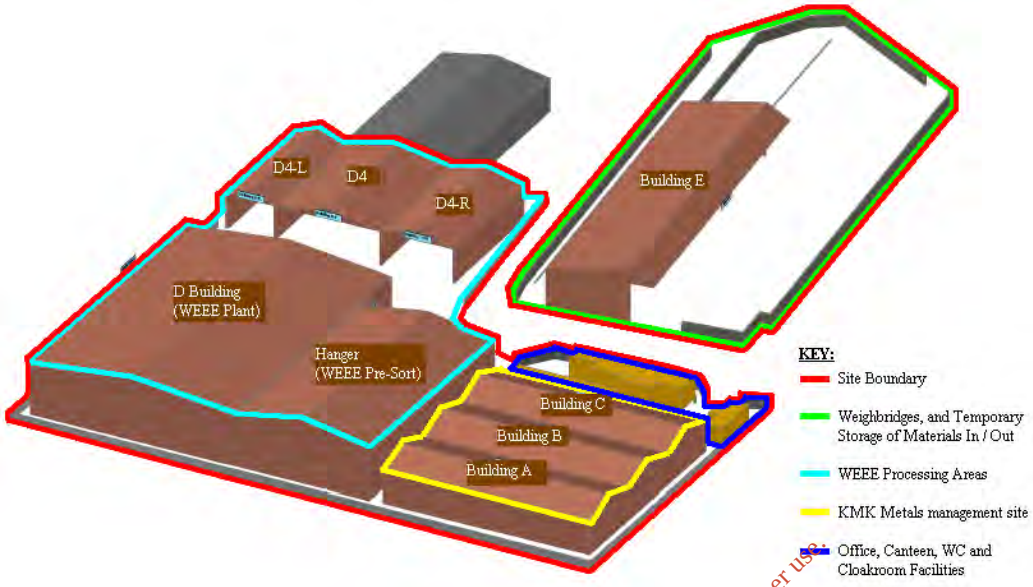
The proposed area to be included is an additional piece of industrial land (2,913m^2) which is now fully developed under existing planning permissions. For the purpose of the waste licence, this new area of the site will be renamed as E area. A modified photo below illustrates the existing site including the area proposed for inclusion in the new waste licence i.e. E existing and E proposed and to be renamed as E area of the new waste licence subject to grant of same.

Site Layout (Aerial Photograph):



Similarly, a schematic layout plan is attached below showing a three dimensional illustration of the existing site.

Site Layout (Schematic 3D Drawing):



In light of the 'Duty and Stand-by Capacity Report' submitted to the Agency in 2009, this report concluded that there is adequate storage facilities at the site for additional tonnages of WEEE in a safe and secure manner.

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

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

Area	**Building Refs**	**Description of waste processes.** [note 1]
Metallic wastes, sludges and liquids management	A (self bunded & secure)	Dedicated storage for non-ferrous metals, base metal fractions, and packaged filter cakes arriving directly from customers via KMK Metals (brand) collections.
	B (bunded & secure)	This building is split into two separate locations i.e. a double bunded area with sump and a regular area with separate activities as follows: Double bunded area with sump. o Dedicated bunded storage for: waste oil removed from Oil Filled Radiators (at the D-Hanger building on-site); Lead Acid Batteries; sludges (typically clay consistency); tradable metal containing liquids; and other items requiring either secure storage or storage in a bunded location (sorted capacitors, ionisation chamber smoke detectors, any component removed from WEEE believed to contain a hazardous material i.e. refractory ceramic fibers, mercury or asbestos, packaged nickel-cadmium batteries). Regular B building area. o This area is used for sorting and repackaging of dry materials.
	C	This building is split into two separate locations i.e. an insulated secure warehouse area and a materials loading and off-loading area. The respective activities are as follows: Insulated secure warehouse area: can be used for secure dry storage but is presently used for dismantling of electrical scrap (items of WEEE are dismantled here either because they are problematic for KMK's WEEE Plant - either too robust i.e. Transformers, or cause contamination i.e. glass contamination of metal fractions from Microwave plates) or because the material contains either high value items or because specific recovery is required by customer e.g. reconciliation of Eprom Chips from dismantling of E-Voting Machines). KMK plans to install a new process for automated dismantling of Flat Panel Displays, and at present envisages that the new process will be installed at this location (though the location is subject to change if necessary). The fully automated dismantling activity will take place within an enclosed module under negative pressure, with state-of-the-art air abatement technology (including carbon filter system): the process has been described in further detail through other communications with the EPA. Materials loading and off-loading area: This area is used for off-loading of incoming materials and loading of materials arising from KMKs processes, plus temporary storage (under cover) of large bulky metal items (KMK Metals brand) and items prepared by KMK for downstream recycling / recovery.
Admin. and Welfare	Office A, B, C	Includes the main reception area and offices, meeting rooms, canteens, toilet and cloakroom facilities.

Area	Building Refs	Description of waste processes. [note 1]
WEEE Management	D-Hanger	The Hanger building is an open ended dedicated WEEE pre-sorting area, with a large storage bay for pre-sorted WEEE pending processing through the WEEE Plant. Items removed during the pre-sort fall within one or more of three categories: - Items required to be removed from WEEE for selective treatment in accordance with the WEEE Directive – where suitable / practical and unless intended for removal during the WEEE Process (examples include: external batteries, refrigerated equipment (mini fridges, dehumidifiers etc); gas discharge lamps / equipment containing gas discharge lamps e.g. laptop screens / LCD TV's; external electric cables; components containing radioactive devices e.g. some types of Smoke Detector; and any particularly old equipment (for screening, for asbestos / mercury / ceramic fibres) o Some of the above items should have been segregated at source (i.e. by Civic Amentiy Sites) but if source segregation was not 100% effective then the KMK pre-sort activity ensures these are removed at the earliest appropriate stage in the treatment process - Items for which KMK has another separate dedicated process (typically these are non-SHA items, destined for selective treatment elsewhere in KMK) but this also includes Oil Filled Radiators (for de-pollution) and items of WEEE destined for KMK's Electrical Scrap Dismantling activity - Items which are not WEEE Plant "friendly" (items that are too robust, or that are problematic for the process i.e. Timber)
	D-WEEE Plant	The WEEE Plant houses a dedicated process for WEEE treatment (manual picking, mechanical disassembly, magnetic separation, more manual picking, shredding, milling, and sorting by Eddy Current and Flotation Tank); this results in the generation of hazardous and non-hazardous fractions, some of positive and some of negative value, for example batteries*, circuit board, motors, transformers, capacitors*, plastics, ferrous- and non-ferrous metals. * = destined for another process in KMK (sorting).
	D4	Receipt of Televisions and Monitors; removal and temporary storage of all flatscreen TV's; manual dismantling of CRT Television and Monitor screens.
	D4-R	Receipt of Large Household Appliances; depollution of Washing Machines, and baling of washing machine carcasses / steel, to form Steel Bales for further Recycling at a downstream facility.
	D4-L	This building currently houses KMK's Battery Sorting Plant, which is also used for Capacitors Sorting. Batteries are sorted by chemistry (the majority are Alkaline / Zinc Carbon, and a Quality Check is carried out that fraction). Capacitors are sorted as to whether they can be positively identified as being PCB-Free or not; those which are aluminium and PCB-Free are sent for Aluminium recovery. Those which are PCB-Free and plastic are sent for energy recovery, and those which cannot be determined as PCB-Free are sent for hazardous waste incineration (precautionary principle).
	DX (Yard)	This area is used for off-loading of incoming trucks (which can contain items of WEEE i.e. cages of Small Household Appliances, cages of CRT, Large Household Appliances) and loading of trucks with Fridges/Freezers (LHA-Cold) or steel bales.

Area	Building Refs	Description of waste processes. note 1
WEEE management	E Building	This building is currently used for additional storage capacity of materials incoming / outgoing. All buildings at KMK (including E Building) have full planning permission for the waste management activities carried out at the site. KMK requires the flexibility to be permitted to relocate specific individual processes within E building for example (but not limited to) the operations previously described at D4-R building (steel baling). KMK may require an air emissions point from E building (the precise nature and location of which is to be confirmed and installation of which would be subject to agreement by the EPA, in accordance with the requirements of our Waste Licence) to allow for a ventilation/extraction system should it be required in the future, as associated with the treatment of the materials currently accepted at the facility. A portion of the E-Building is developed as office space, housing KMK's weighbridge office / docket printing station.
	E (Yard)	This area is used for the following activities: o Weighing of incoming / outgoing consignments (using KMK's two installed, fully operation and calibrated Weighbridges) o Storage of Skips containing o (incoming) Small Household Appliances - pending processing and o (outgoing) Packaging Waste, Timber Waste (for recycling) and other Non-Hazardous Waste for energy recovery o Staff car parking facilities o Visitor car parking facilities (near the main Reception Building)

Note 1 = The nature of wastes accepted by KMK rarely requires profiling. All waste electrical equipment is accepted by KMK (that is, anything which has or once had a plug or battery, including light bulbs / tubes and batteries), and metals in solid form. KMK has established customers who provide metals-containing residues / filter cakes from manufacturing activities and the nature of these materials from these established contacts rarely changes. If KMK has any doubt as to the nature of materials incoming (perhaps from a new customer or a new process) then the material is profiled by KMK prior to receipt (this includes prior to acceptance of Capacitors or Medical Devices).

In summary, the revised facility will promote recovery and recycling of hazardous and non hazardous fractions and components from WEEE. It is envisaged that the facility will help to:

- promote compliance with the WEEE Directive (using BATRRT)
- improve the nationwide recycling/recovery infrastructure and provide a more sustainable solution to waste management within Ireland
- save fuel (and transport cost) since post-process material is more efficient for transport (material which previously was transported as whole wee is now transported as smaller components, metals or plastics) – therefore increasing the amount of material per load and reducing the number of movements
- save energy, since the process installed by KMK will be more energy efficient than other similar activities (in the UK for example)
- support the local economy (construction works and ongoing maintenance will be carried out by local companies) and create employment
- contribute to Ireland's National Batteries Recycling Target: the new process will enable recovery of approximately 1 tonne of batteries per month, which previously would have been lost when Small Household Appliances were exported whole
- reduce the reliance on direct export of WEEE from sources (civic amenity sites and commercial sites)

Site location and layout maps are shown in attachment B2 of the Waste Licence Review application.

12. (1) Subject to sub-article (2), in the case of an application for a waste licence, the application shall -

a) Give the name, address and, where applicable, any telephone number and telefax number of the applicant (and, if different, the operator of the facility concerned), the address to which correspondence relating to the application should be sent and, if the applicant or operator is a body corporate, the address of its registered office or principal office

This application is being made for KMK Metals Recycling Ltd, Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly. KMK is a registered business, Ref: 67176, with telephone number 057 934 1634. The facility is owned and operated by KMK.

Nally Environmental, Drumcree, Collinstown, Mullingar, Co Westmeath, Tel: 044 9666773 submits this non technical summary, as consultants, acting on behalf of KMK, the applicant.

b) Give the name of the planning authority in whose functional area the relevant activity is or will be carried on

The existing waste management site is subject to Offaly County Council's planning authority.

c) In the case of a discharge of any trade effluent or other matter (other than domestic sewage or storm water) to a sewer of a sanitary authority, give the name of the sanitary authority in which the sewer is vested or by which it is controlled

There will be no changes from the previous waste licence W0113-03 and therefore no effluent will be discharged to sewer of a sanitary authority or other body.

The proposed surface water discharge impacts from the proposed E area will be as follows:

- Surface water run-off from the concrete surface areas of the site is directed via gullies to an interceptor unit (after attenuation tank storage) prior to connection to the existing shared drain in the industrial estate which serves to remove surface water run-off from a number of commercial businesses. KMK has developed E area by means of weighbridges, pre-cast concrete walls, entrance gates, ESB sub-station building and a large open ended WEEE storage building where incoming WEEE may be stored and/or processed prior to movement to existing process areas within the facility. Drainage from the E building roof is diverted to the existing drainage infrastructure directly and thus by-passes the proposed interceptor unit.

d) Give the location or postal address (including, where appropriate, the name of the townland or townlands) and the National Grid reference of the facility or premises to which the application relates

The facility is located in Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly, at grid reference E635890 N725043, maps previously submitted with the review application.

e) Describe the nature of the facility or premises concerned, including the proposed capacity of the facility or premises and, in the case of an application in respect of the landfill of waste, the requirements specified in Annex 1 of the Landfill Directive

KMK currently operates a hazardous and non hazardous metal waste and electrical and electronic waste transfer facility and is EPA licensed ref W0113-03. This facility is currently licensed to handle 20,000 tonnes of waste. Collected waste arrives as either metallic materials or WEEE materials. The descriptions of operations at the facility in terms of metals and WEEE treatment are previously described the aforementioned tables on pages 3 to 6.

The resultant WEEE and associated materials (principally direct metals recovery e.g. copper, aluminium, steel and other non ferrous mixtures) is exported in a safe and fully authorised manner to approved recovery outlets in UK and Europe.

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

KMK's wastes are treated as follows: timber (broken pallets for example) are sent for recycling; plastic packaging and cardboard is sent for recycling; capacitors (which cannot be determined as PCB-Free) and phosphor powder from CRT (less than one steel drum per year) are sent for hazardous waste incineration; dusts from the WEEE Plant (cyclone) extraction system shall be sent for metals recovery, and from the Smasher extraction system, for energy recovery; and all other non-hazardous waste (canteen waste; washing machine pipes; rubber stoppers from CRT, and general solid small non-hazardous residuals (i.e. workbench / floor sweepings) are sent for energy

recovery; waste oil is collected for recovery in Ireland; and sludge from the flotation tank / silt from yard drains is taken for remediation in Ireland.

Currently KMK send no waste for disposal through landfill or deep burial.

f) Specify the class or classes of activity concerned, in accordance with the Third and Fourth Schedules of the Act and, in the case of an application in respect of the landfill of waste, specify the class of landfill in accordance with Article 4 of the Landfill Directive.

In relation to the amended waste license application form 2011 and the revisions to the Fourth Schedule of the Waste management Acts 1996 to 2011, KMK confirms the following classes of activities for the site:

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

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

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

Consequently, other activities carried out on site include:

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

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

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

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

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

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

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

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

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

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

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

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

g) Specify, by reference to the relevant European Waste Catalogue codes as presented by Commission Decision 2000/532/EC of 3 May 2000, the quantity and nature of the waste or wastes which will be treated, recovered or disposed of

There are no changes planned to the nature and types of waste to be accepted and handled at the facility from the existing waste licence ref: W0113-03

However, it is intended to increase the quantities from the existing 20,000 to 35,000 tonnes maximum for waste acceptance per year. The capacity of the existing buildings, processing areas and proposed additional land will be more than adequate to cater for this proposed increase in tonnage.

h) Specify the raw and ancillary materials, substances, preparations, fuels and energy which will be utilised in or produced by the activity

There will be no changes or additions to the types of raw materials, energy and fuels used at the revised site.

i) Describe the plant, methods, processes, ancillary processes, abatement, recovery and treatment systems and operating procedures for the activity

There will be no significant changes from the existing waste licence W0113-03 regarding the type of operations at the facility i.e. acceptance and handling of non hazardous and hazardous metallic and WEEE waste items for recovery purposes.

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

The proposed changes to hours of waste acceptance and operation of the facility will be 06:00 to 22:00 Monday to Friday inclusive and 06:00 to 13:00 on Saturdays. The proposed hours as detailed above will provide for adequate flexibility of activities in the event of any contingency plans at the site where additional time is required for specific waste handling projects.

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

j) Provide information for the purpose of enabling the Agency to make a determination in relation to the matters specified in paragraphs (a) to (i) of section 40(4) of the Act

a. Environmental emissions (noise, dust, surface water, groundwater, point source stack emission) from the operation of this facility by KMK are monitored as part of

the existing waste licence W0113-03 (including the Technical Amendment granted on 25th June 2012). These emissions do not result in the contravention of any relevant standards. The proposed E area within the waste licence boundary will not result in significant or otherwise adverse emissions to environment, although a possible point source emission may be required as part of future operations at the E building.

b. Environmental pollution will not occur for the following reasons:

- All waste acceptance and handling will occur indoors or under roof where appropriate.
- All on-site domestic effluent will be treated by a combination of Primary, Secondary and Sand Filter Tertiary treatment before discharge to land drain.
- All surface water run-off from existing outside yard areas passes through interceptor units before entering a land drain.
- The stack emission and noise emissions from the WEEE treatment process will be sufficiently controlled to levels which will not cause adverse impacts to the environment.
- All ambient emissions (noise and dust) are controlled and do not cause adverse impacts to humans or the environment.
- KMK actively maintain an Environmental Management System (EMS), which is routinely audited by the National Standards Authority of Ireland and certified for compliance with the ISO 14001:2004 Environmental Management Standard.

c. The Best Available Techniques (BAT) will be used to prevent, eliminate and control emissions from the activity concerned. The activity is consistent with the objectives of the relevant waste management plan.

d. KMK are fit and proper to hold a waste licence as defined by the EPA and an existing waste license is in place at the site ref: W0113-03.

e. In the event of decommissioning the facility, KMK will follow the procedures as defined under the granted licence and specified in the Decommissioning Plan which has been submitted to the Agency as part of compliance with license W0113-03. A financial bond will be maintained to ensure funds will be available to carry out such works as are needed.

f. Vehicles and machinery will be regularly maintained to prevent unnecessary wear and tear that can lead to increased energy consumption.

g. Noise emissions from the site are not deemed to have a nuisance effect on the surrounding environment. The future developments of this facility are not deemed to pose any notable increase in noise emissions at Noise Sensitive Locations. The annual noise monitoring will occur as per the conditions of the licence, in the event of a complaint further noise monitoring will be conducted at the site.

h. There are a number of structures on site to prevent accidents occurring which will have an effect on the environment. In the event of an accident, procedures have been put in place to limit the consequences to the environment. Details of these procedures are contained in Attachment J. Details of each contingency are dealt

with in more detail in Attachment J. Measures to decommission the site in the event of the cessation of all or part of the activity are described in Attachment K.

(k) Give particulars of the source, location, nature, composition, quantity, level and rate of emissions arising from the activity and, where relevant, the period or periods during which such emissions are made or are to be made,

There will be changes planned from the existing waste licence W0113-03. These are; revised locations for ambient monitoring for dust and noise, the WEEE processing plant presently has a noise and dust point source emission (NE3/A2-8). KMK are requesting potential air emission points at E area and possibly A/B/C area on the basis of waste processing activities increasing into the future. Therefore, should WEEE treatment (e.g. shredding, dismantling, specialist disassembly) be deemed necessary at E building or indeed inside A/B/C buildings, then KMK wishes to have a formal pre-authorisation in place with the EPA for associated emission points, i.e. one emission point at E area reference A2-9 and one emission point at A/B/C area referenced A2-10 to be conditional with the new waste license. This pre-authorisation of the emission points will obviously be subject to formal agreement with the EPA prior to installation and commissioning. During the formal agreement stages, KMK will then have exact details necessary in terms of emission point locations, sources, abatement etc for the EPA to make their decision.

Noise will be controlled at source via noise insulated enclosure structures within the WEEE building to ensure no adverse impacts on the environment.

Water and wastewater are outlined in section 12.(1).c

(l) Give details, and an assessment of the effects, of any existing or proposed emissions on the environment, including any environmental medium other than that into which the emissions are, or are to be, made, and of proposed measures to prevent or eliminate or, where that is not practicable, to limit or abate such emissions,

Stack emissions, ambient dust, noise, surface water and groundwater monitoring is carried out at the site as part of the existing waste licence ref: W0113-03.

In particular, the existing stack emission point A2-8 is controlled effectively using a cyclone abatement plant (screening out the larger dust particles from the incoming air) with the air containing fine dust particles being blown out for further treatment using the existing bag house filter system. This double treatment effect will be very effective to ensure particulate emissions are minimal and within emission limit values of the waste license. Furthermore, a continuous particulates monitoring probe is installed on the stack A2-8. This device effectively operates as a real time detector. Hence, any potential breach or fault on the filter bag which may result in abnormal emissions from the stack above a pre-set level on the probe will be automatically detected and sounded by an alarm alerting management and staff to the occurrence. Appropriate actions can then be taken directly to resolve the situation. Emission point A2-8 is positioned on the south facing side of the newly constructed WEEE Building and therefore emitting controlled noise and dust towards agricultural land which is presently zoned industrial. The estimated noise emission from the fan unit is given as 84dB at 1 metre distance. Hence, the expected noise levels at 40m from the fan will be 52dB (i.e. less than 55dB) and below nuisance levels.

The possible future emission point at E area reference A2-9 and one emission point at A/B/C area referenced A2-10 are not expected to cause nuisance conditions on-site or beyond the site boundaries. This statement is based on similar technologies being applied to these stack emissions as is being applied to A2-8 previously explained.

Ambient dust and noise control measures will further ensure adequate control of emissions, such as processing of waste inside buildings, only temporary outside storage of waste prior to processing and/or export from the facility. Good house keeping measures will also ensure that dust and litter generation is eliminated or kept to a minimum.

All storm water runoff from the existing licensed site is diverted through the two existing surface water interceptors prior to discharge to the existing land drain west of the site. Run-off from the surfaced areas of E will is directed via gullies to a proposed interceptor unit prior to connection to the existing shared drain in the industrial estate which serves to remove surface water run-off from a number of commercial businesses. Drainage from the building roof will be diverted to the existing drainage infrastructure directly and thus by-pass the proposed interceptor unit. The proposed new E area in this application will be used for temporary storage and processing of WEEE (previously described in the operations descriptions tables on page 3 to 6).

There will be no discharges to sewer from the site as there is no foul sewer available. At present, all domestic sewage is treated on-site by the waste water treatment plant (WWTP) i.e. Biocycle type unit with final treated effluent being discharged to soak-away. New proposals for wastewater treatment at KMK are as follows;

- 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 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. The parametric values given for the output of the sand filter by the provider Molloy Precast Environmental Solutions is 5/1/1 for BOD/phosphates/ammonia respectively. These projected treatment values are rated as environmentally sound and of low environmental impact. There will be a sampling chamber located immediately downstream of the sand filter whereby sampling of the final treated effluent can occur.

- The final treated effluent discharge to land drain will also include rainwater run-off from a building roof (ref: D-Hanger) 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 discharge loading to the land drain.

No other emissions are expected from the facility.

(m) Identify monitoring and sampling points and indicate proposed arrangements for the monitoring of emissions and the environmental consequences of any such emissions,

In relation to monitoring/sampling locations for this waste licence review application, all ambient dust, noise, groundwater, surface water and the existing stack emission point were re-identified in a submission dated 11th August 2011 to the EPA. This was subsequently revised in a submission dated 31st August 2012 whereby new noise and dust sampling points were proposed i.e. four locations on site boundaries (north, south, east and west) for both ambient noise and dust.

In addition there will be a new surface water emission from E area (treated surface water run-off) and a treated WWTP emission from the proposed new WWTP and associated biofilter unit to land drain.

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

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

(o) Describe any proposed arrangements for the off-site treatment or disposal of solid or liquid wastes,

There are no changes planned here and all items remain unchanged from the existing waste license W0113-03.

(p) Describe the existing or proposed measures, including emergency procedures, to prevent unauthorised or unexpected emissions and minimise the impact on the environment of any such emissions

Explosions, fire, traffic accidents and spillages are potential emergency situations that could give rise to the release of unauthorised or unexpected emissions from the site.

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

(q) Describe the proposed measures for the closure, restoration, remediation or aftercare of the facility concerned, after the cessation of the activity in question,

This site will not require remediation. The concrete yard and flooring system will inhibit the entrance of contaminants into the underlying soil and groundwater. Interceptor units and drainage gullies will collect potential pollutants before they can reach land drains in the area.

At present it is the intention of KMK to operate this facility for the foreseeable future. Should part of the activity cease to operate, a review of the licence or technical amendment submission with the EPA will be arranged. Decommissioned equipment will be removed from the site to an appropriate disposal or recovery facility.

Should all activities cease to be at the facility, KMK will enter into a review of the waste licence with the EPA in order to surrender the waste licence. The following actions will be carried out to ensure the site is free of contamination and of continuing emissions:

- All waste at the facility will be sent off-site for appropriate recycling/disposal at alternative licensed facilities.
- All Waste Handling and storage equipment and vehicles will be removed from the site either by selling them and / or decontamination where necessary, dismantling them and recovering them by an approved metal recycler.
- All fuel tanks and bunds will be decommissioned.
- The interceptors will be examined and cleaned out by approved contractors.
- The gates to the facility will be locked and security measures implemented to prevent scavenging on site after it is decommissioned.
- Ongoing monitoring shall be carried out by an approved EPA consultancy and records of all monitoring shall be maintained after the closure process.
- A Clean Closure verification audit shall be completed by an approved EPA consultancy which will confirm that clean closure has been achieved by the facility. Details of this audit shall then submitted to the Agency.

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

A Decommissioning Plan for the facility has been submitted to the Agency along with and Environmental Liabilities Risk Assessment (ELRA) in compliance with Conditions 10.2.1 and 12.3.2 of the facilities waste licence; W0113-03. Any decommissioning procedures will be agreed with the EPA in advance should all or part of the activity cease to operate.

To financially underwrite the decommissioning of the activities on the site KMK has a closure bond with the EPA for €64,000 for these eventualities. This bond has been re-assessed as part of the Environmental Liabilities Risk Assessment (ELRA) methodology and subsequently will be arranged with the EPA as the appointed site regulator.

(r) In the case of an application in respect of the land-filling of waste, give particulars of -

No waste disposal will be occurring on site.

(i) Such financial provision as is proposed to be made by the applicant, having regard to the provisions of Articles (7)(i) and (8)(a)(iv) of the Landfill Directive and section 53(1) of the Act, and

No disposal of waste is to occur on site.

(ii) Such charges as are proposed or made, having regard to the requirements of section 53A of the Act,

No disposal of waste is to occur on site.

(s) State whether the activity is for the purposes of an establishment to which the European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2000 (S.I. No. 476 of 2000) apply,

No dangerous substances defined as highly flammable or explosive liquids are to be collected, treated or stored on site. Only hazardous metallic and/or WEEE wastes may be found during normal operations as part of waste loads being accepted.

The European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2000 do not apply to this facility.

(t) In the case of an activity which gives rise or could give rise to an emission into an aquifer containing the List I and II substances specified in the Annex to Council Directive 80/68/EEC of 17 December 1979, describe the existing or proposed arrangements necessary to give effect to Articles 3, 4, 5, 6, 7, 8, 9 and 10 of the aforementioned Council Directive

No list I or list II substances are to be accepted or treated on site.

TABLE OF CONTENTS

1.0 INTRODUCTION

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

The following revised details are also noted;

This revised EIS non technical summary has been prepared on behalf of KMK Metals Recycling Ltd (to be referred to as KMK hereafter), Cappincur Industrial Estate, Daingean Road, Tullamore, Co. Offaly by Nally Environmental, Drumcree, Collinstown, Mullingar, Co Westmeath to accompany the waste licence review application ref: W0113-04 to the EPA.

The local planning authority (Offaly County Council) was notified of the waste licence review application in 2009 and subsequent communication letters from the EPA. As a result of which, confirmation of the requirement for a new planning application with an EIS was hence obtained by KMK in a letter dated 17th February 2012 (see page 11 of the Main EIS).

KMK can now confirm that full planning permission was subsequently granted by Offaly County Council for all developments at KMK on the 3rd April 2013. The full development description is as follows; *'A CHANGE OF USE OF 7 NO. PERMITTED INDUSTRIAL BUILDINGS FROM WAREHOUSE STORAGE USE TO USE FOR THE PROCESSING OF WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT (WEEE), WASTE METALS AND METALLIC BASED MATERIALS, AS FOLLOWS: BUILDING A, TOTAL GROSS FLOOR AREA 473 SQ M, BUILDING B, TOTAL EXISTING GROSS FLOOR AREA 473 SQ M; BUILDING C, TOTAL GROSS FLOOR AREA 473 SQ M; BUILDING D (HANGER) TOTAL GROSS FLOOR AREA 927 SQ M; BUILDING D (WEEE) TOTAL GROSS FLOOR AREA 1,841 SQ M; BUILDING D 4 TOTAL GROSS FLOOR AREA 920 SQ M (COMPRISING CENTRAL AREA 391 SQ M, D4-R AREA 318 SQ M AND D4-L AREA 211 SQ M); AND; BUILDING E TOTAL GROSS FLOOR AREA 1,120 SQ M. OTHER WORKS ARE PROPOSED TO BUILDING E INCLUDING A NEW ESB SUBSTATION (24.5 SQ M), AN ESB SWITCH ROOM (14.4 SQ M), ANCILLARY ACCOMMODATION (33.1 SQ M) ON THE GROUND FLOOR AND FIRST FLOOR OPEN PLAN OFFICES (82 SQ M). THE UPGRADING OF THE EFFLUENT TREATMENT SYSTEM INVOLVES THE PROPOSED INSTALLATION OF AN ADDITIONAL WASTE WATER TREATMENT TANK WITH A SUBSEQUENT SAND FILTER UNIT COVERING AN AREA OF 95 SQ M. THE PROPOSED DEVELOPMENT INCLUDING THE INCREASE IN THE ANNUAL WASTE INTAKE TO 35,000 TONNES IS THE SUBJECT OF A CURRENT EPA WASTE LICENCE REVIEW APPLICATION REF. W0113-04. AN ENVIRONMENTAL IMPACT STATEMENT (E.I.S.) AND A NATURA IMPACT STATEMENT (N.I.S.) HAVE BEEN SUBMITTED WITH THIS PLANNING APPLICATION. AT CAPPINCUR INDUSTRIAL ESTATE, TULLAMORE, CO. OFFALY'.*

2.0 SITE LOCATION AND DESCRIPTION

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

3.0 PROPOSED DEVELOPMENT

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

4.0 HUMAN BEINGS

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

Potential impacts to residences from the site regarding air quality, water run-off, visual impact, traffic and noise are discussed further in this non technical summary document.

5.0 TRAFFIC

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

6.0 CLIMATE AND AIR QUALITY

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

The following revised details are also noted;

There is one emission stack from the facility and only extracted air from inside the D-WEEE Plant building is discharged through the stack (ref; A2-8 within the waste licence W0113-03). The stack emission point is controlled effectively using a cyclone abatement plant (screening out the larger dust particles from the incoming air) with the air containing fine dust particles being blown out for further treatment using the existing bag house filter system. This double treatment effect will be very effective to ensure particulate emissions are minimal and within emission limit values of the waste license. Furthermore, a continuous particulates monitoring probe is installed on the stack A2-8.

This device effectively operates as a real time detector. Hence, any potential breach or fault on the filter bag which may result in abnormal emissions from the stack above a pre-set level on the probe will be automatically detected and sounded by an alarm alerting management and staff to the occurrence. Appropriate actions can then be taken directly to resolve the situation. Emission point A2-8 is positioned on the south facing side of the newly constructed WEEE Building and therefore emitting controlled noise and dust towards agricultural land which is presently zoned industrial.

KMK as part of communications regarding the waste licence review application W0113-04, are requesting potential air emission points at E area and possibly A/B/C area on the basis of waste processing activities increasing into the future. Therefore, should WEEE treatment (e.g. shredding, dismantling, specialist disassembly) be deemed necessary at E building or indeed inside A/B/C buildings, then KMK wishes to have a formal pre-authorisation in place with the EPA for associated emission points, i.e. one emission point at E area reference A2-9 and one emission point at A/B/C area referenced A2-10 to be conditional with the new waste license. This pre-authorisation of the emission points will obviously be subject to formal agreement with the EPA prior to installation and commissioning. During the formal agreement stages, KMK will then have exact details necessary in terms of emission point locations, sources, abatement etc for the EPA to make their decision.

7.0 NOISE

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

8.0 SOILS AND GEOLOGY

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

9.0 WATER

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

10.0 LANDSCAPE AND VISUAL IMPACT

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

11.0 CULTURAL HERITAGE

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

12.0 FLORA AND FAUNA

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

13.0 INTERACTION OF THE FOREGOING

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.

14.0 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Please refer to the original EIS Non Technical Summary dated August 2012 as submitted previously to the EPA in relation to waste licence ref: W0113-04 for all details.