



OFFICE

This report was approved to go to the Director by Frank Clinton, Programme Manager.

Signed *Gráinne Uglyesby* Date: 18.03.2015

RESOURCE USE

**ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM**

**TO:** DARA LYNOTT, DIRECTOR  
**C.C:** Frank Clinton  
**FROM:** Brian Meaney - Environmental Licensing Programme  
**DATE:** 18 March 2015  
**RE:** Request for a Technical Amendment to IE Licence Register Number **W0113-04** held by **KMK Metals Recycling Limited** for a facility at Tullamore, Co. Offaly.

**Introduction**

KMK Metals Recycling Ltd is authorised for the operation of a hazardous waste transfer station and WEEE processing facility at Cappincur Industrial Estate, Tullamore, Co. Offaly. The facility was first authorised under a waste licence in December 2001. The waste licence was reviewed in August 2005, April 2008 and December 2013. The licence was amended in December 2013 for the purposes of the Industrial Emissions Directive. Up to 35,000 tonnes per annum of waste and hazardous waste can be accepted at the facility.

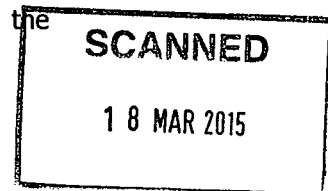
**Details of request for technical amendment under section 96 of the EPA Acts 1992, as amended**

Schedule A.2 of the licence provides a listing of EWC codes for wastes authorised for acceptance at the installation. The licensee, in their request for licence amendment, highlights some apparent exclusions in the EWC code listing included in the licence. Amendment is proposed. The following are the EWC codes in question and my comment on whether they were previously authorised and sought in the licence review application:

EWC code	Authorised by the previous licence W0113-03 <sup>1</sup>	Requested in licence review application? <sup>2</sup>
05 01 09*	Yes	Yes, typographical error
06 06 02*	No	No
10 08 08*	No	No
12 01 13	Yes	Yes
16 11 03*	No	Yes, typographical error

<sup>1</sup> According to a list provided in the licence review application of October 2009.

<sup>2</sup> Based on an updated listing provided in March 2012 that was used as the basis for writing the revised licence.



The EWC codes in the above table fall into the following 3 categories:

1. Those that are stated to have been authorised under the earlier licence (W0113-03) but were not so listed in the licence application documentation and were not requested for inclusion in the licence (06 06 02\* and 10 08 08\*);
2. Those that are stated to have been authorised under the earlier licence but, due to EPA error when composing the text of the revised licence, were not included in the revised licence (12 01 13); and
3. Typographical errors in the presentation of certain EWC codes in the application that were not picked up by the EPA when composing the text of the revised licence (05 01 09\*, 16 11 03\*).
4. In addition to the listing above, the following additional typographical errors were made in the licence application but were not picked up by the EPA: 05 01 99\*, 07 01 99\*, 07 04 10, 07 05 10, 16 10 04\*.

The items in category 1 cannot be recommended for technical amendment because there is no documentation provided on the nature of the wastes, the processing they will undergo or their potential for environmental emissions.

Correction of the omission and errors highlighted in the categories 2 to 4 above is recommended.

OEE advised that the proposed changes cannot be accommodated under the existing licence. A footnote to the table in Schedule A is proposed that will allow for future agreement under the licence of additional compatible waste streams and EWC codes.

A screening for appropriate assessment was carried out and is documented in the proposed Technical Amendment and the Appropriate Assessment Screening Determination that accompanies this report.

### **Recommendation**

I recommend that the Agency make a technical amendment of licence register number W0113-04 under Section 96(1)(c) of the EPA Acts 1992 as amended.

Signed:



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Brian Meaney