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2025

**KMK Metals Recycling
Kilbeggan,
Operational Report**



Operational Report

KMK Metals Recycling Ltd, Kilbeggan, County Westmeath

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1. INTRODUCTION

The KMK Metals Recycling Ltd (KMK) installation in Kilbeggan, Co. Westmeath operates under an Industrial Emission (IE) Licence issued by the Environmental Protection Agency (P1076-01). This Operational Report was prepared to support an application for licence review to obtain approval for a discharge to foul sewer of storm water run-off from areas of the site where there is potential for contamination to occur and to increase the stack emission limit for A2 from 10,000 m³/hr to 40,000 m³/hr.

1.1 Scope

This report describes the design criteria and method of operation of the installation. It is based on the conditions in the current licence and the operational procedures prepared by KMK. Following the grant of the revised licence this report will be amended to bring it into alignment with the conditions of the revised licence.

1.2 Annual Review

This report will be subject to an annual review throughout the operational life of the installation to take account of operational experience, changes in regulatory requirements and developments in waste processing technology and methodologies.

2. SITE LOCATION & ENVIRONMENTAL SETTING

2.1 Site Location

The site location is shown on Figure 2.1. The site is on the outskirts of Kilbeggan town, approximately 900m west of the town centre, with access off the Moate Road (R446). It is bounded to the north and west by agricultural land, to the south by the R446 road and to the east by an industrial unit.

2.2 Surrounding Land Use

The land use surrounding the site is predominantly agricultural, with an industrial unit at the eastern boundary as shown on Figure 2.2. An unused forecourt and shop are directly to the south and across the R446. The closest large residential areas are approximately 400 m to the east and 350m to the southeast, with the closest individual private residences approximately 180 m from the western boundary and 95 m from the eastern boundary.

2.3 Hydrology

The River Brosna flows in a northeast-southwest direction approximately 420 m to the southeast of the site. The EPA River Waterbody WFD 2010-2015 Status is 'High' with a River Waterbody Score of 'At risk of not achieving good status'. A monitoring site on the river in Kilbeggan Town recorded a sample as 'Good Status'.

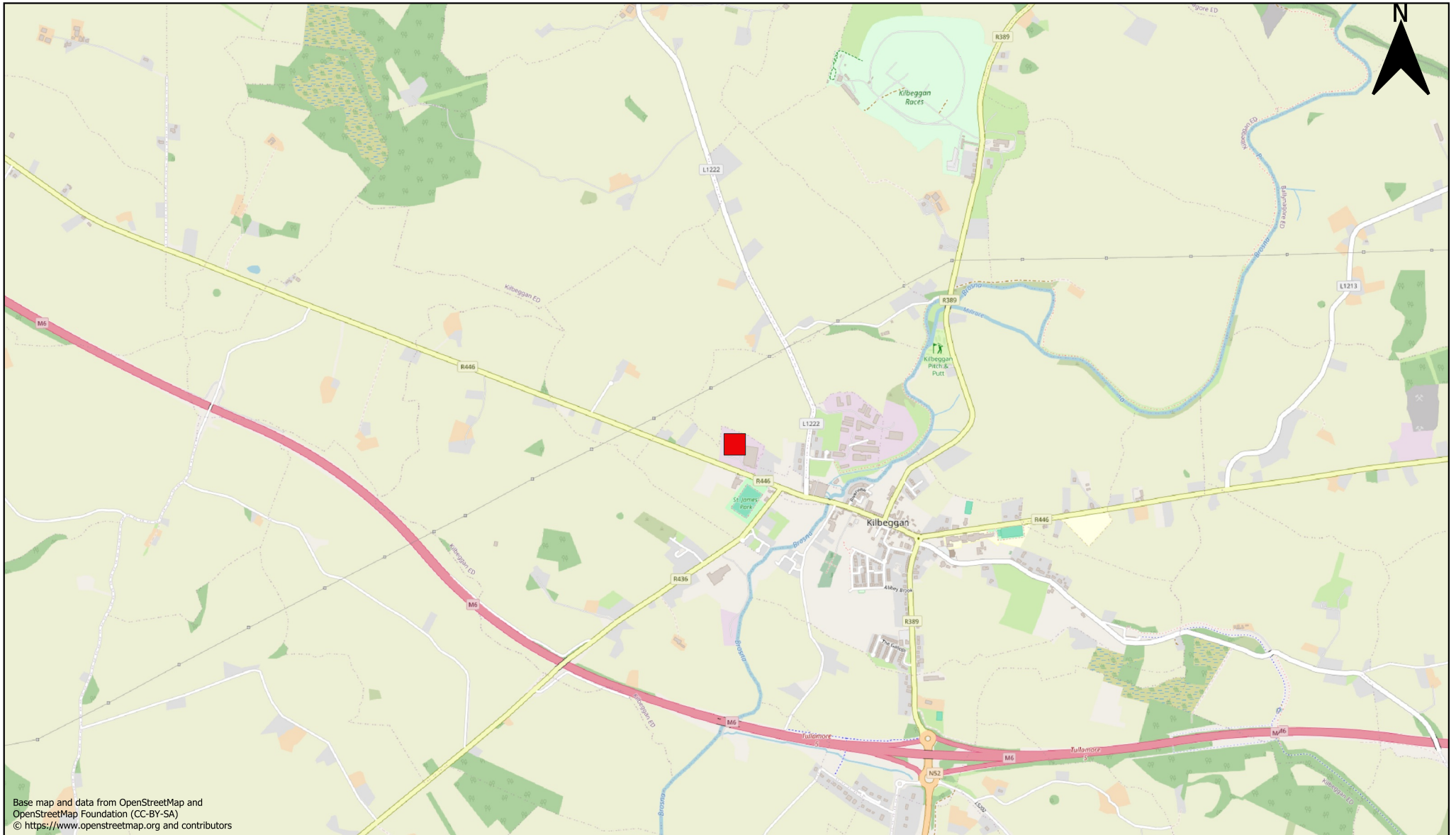
2.4 Geology and Hydrogeology

The site is underlain by made ground, which overlies Limestone Till. The Made Ground ranges from 0.78m below ground level (bgl) to 2.3 mbgl. Below it are layers of Clay, Sand and Silt. The total depth of the subsoils range from 0.8 to 14.3 mbgl.

The bedrock is Walsortian Limestone, consisting of massive unbedding lime-mudstone that is extensively weathered. The Walsortian Limestone is classified as a locally important bedrock aquifer, moderately productive only in local zones. A review of the GSI groundwater well database identified that the closest recorded well is 1.2 km to the north of the site but there is no further information available on the well. The site is located within the Clara Groundwater Body (IE_SH_G_240) (GWB). The Clara GWB has a Groundwater WFD Status of 'Good'.

2.5 Designated Sites

There are no habitats of ecological importance within the site boundary and the site is not in or close to a Special Area of Conservation (SAC), Special Protected Areas (SPA) or National Heritage Areas (NHA). The proposed development is not located within any Natura 2000 site. There are several SAC and NHA within 10 km of the installation. The Split Hills and Long Hill Esker SAC and pNHA is located approximately 3 km to the north of the site, the Cloncrow Bog NHA is approximately 7km to the north east and the Clara BOG SAC and pNHA is approximately 9 km to the southwest.



ORS Building Consultants Ltd Unit 7b, Airport East Business and Technology Park, Rathmacullig West, Ballygarvan, Co. Cork. Tel. (021) 4345366 email: info@ocallaghanmoran.com	CLIENT KMK Metals Recycling Limited	DETAILS 0 500 m Site Location
This drawing is the property of ORS Building Consultants Ltd and shall not be used, produced or disclosed to anyone without the prior written permission at ORS Building Consultants Ltd and shall be returned upon request.	TITLE Site Location	FIGURE 2.1



 ORS Building Consultants Ltd Unit 7b, Airport East Business and Technology Park, Rathmacullig West, Ballygarvan, Co. Cork. Tel. (021) 4345366 email: info@ocallaghanmoran.com	CLIENT KMK Metals Recycling Limited	DETAILS 0 250 500 m  site boundary
This drawing is the property of ORS Building Consultants Ltd and shall not be used, produced or disclosed to anyone without the prior written permission at ORS Building Consultants Ltd and shall be returned upon request.	TITLE Surrounding Landuse	FIGURE 2.2

3. SITE DESIGN

3.1 Site Layout

The existing site layout is shown on Drawing No.15-097-24-P03. The site slopes from approximately 68 mOD in the northwest corner to approximately 65 mOD at the southern perimeter. It encompasses approximately 1.7 hectares and is occupied by a waste processing building (c. 3,900 m²) consisting of two interconnected buildings (Building A and B) with car parking in the south of the site. A weighbridge office and an MV substation building are due to be constructed on the site (SEW).

3.2 Security

The site is surrounded by a security fence. Access is via the front gate, which is locked when the facility is closed.

3.3 Services

3.3.1 Water Supply

Water for use in staff welfare facilities is obtained from mains supply. There are two 10,000L overground rainwater harvesting tanks onsite for the reuse of rainwater on site.

3.3.2 Storm Water and Wastewater

Sanitary wastewater from the site is discharged via a dedicated sewer line to the front of the installation to the Uisce Eireann wastewater treatment plant at Kilbeggan town. Rainwater from areas with the potential for contamination to occur will be directed via an oil interceptor to the Uisce Eireann foul sewer.

3.3.3 Electricity Supply

There is an existing connection to the national grid and a new electrical substation will be provided. The electricity from the roof mounted solar panels will be used directly on site.

3.4 Facility Roads, Access Roads & Hardstanding

The site is accessed from the Moate Road (R446). The internal access roads and hardstanding are provided in accordance with Condition 3.19 of the current licence.

3.5 Site Buildings

All of the buildings are maintained in accordance with Conditions 3.1 and 3.3 of the current licence.

LEGEND	
	EXISTING SURFACE WATER DRAINAGE PIPEWORK (CONTAMINATED YARD WATER)
	EXISTING SURFACE WATER MANHOLE (CONTAMINATED YARD WATER)
	PROPOSED UNCONTAMINATED ROOF WATER DRAINAGE PIPEWORK
	PROPOSED NEW MANHOLE ON DRAINAGE NETWORK FOR UNCONTAMINATED ROOF WATER
	EXISTING RAINWATER DOWN PIPE IN EXISTING BUILDINGS
	PROPOSED RISING MAIN DISCHARGING SURFACE WATER (CONTAMINATED YARD WATER ONLY) AT 2 L/s TO EX. FOUL NETWORK
	EXISTING FOUL SEWER NETWORK

Manhole Schedule				
Uncontaminated Roof Water Drainage Network				
Type	Name	Cover Level	Invert Level	
Existing	MH S3.2	67.62 m	66.59 m	
Existing	MH S3.1	67.51 m	66.46 m	
New	MH SWR1	67.55 m	66.41 m	
New	MH SWR2	67.55 m	66.24 m	
New	MH SWR3	67.55 m	66.13 m	
New	MH SWR4	67.55 m	66.13 m	

DO NOT SCALE: CONTRACTOR TO CHECK ALL DIMENSIONS AND REPORT ANY OMISSIONS OR ERRORS TO MCCE

GENERAL NOTES

ALL LEVELS, EXISTING OVERGROUND AND UNDERGROUND SITE SERVICES TO BE CONFIRMED ON SITE BY CONTRACTOR PRIOR TO COMMENCEMENT OF THE DEVELOPMENT.

ALL LEVELS RELATE TO MALIN HEAD ORDINANCE DATUM

DO NOT SCALE THIS DRAWING - USE FIGURED DIMENSIONS ONLY.

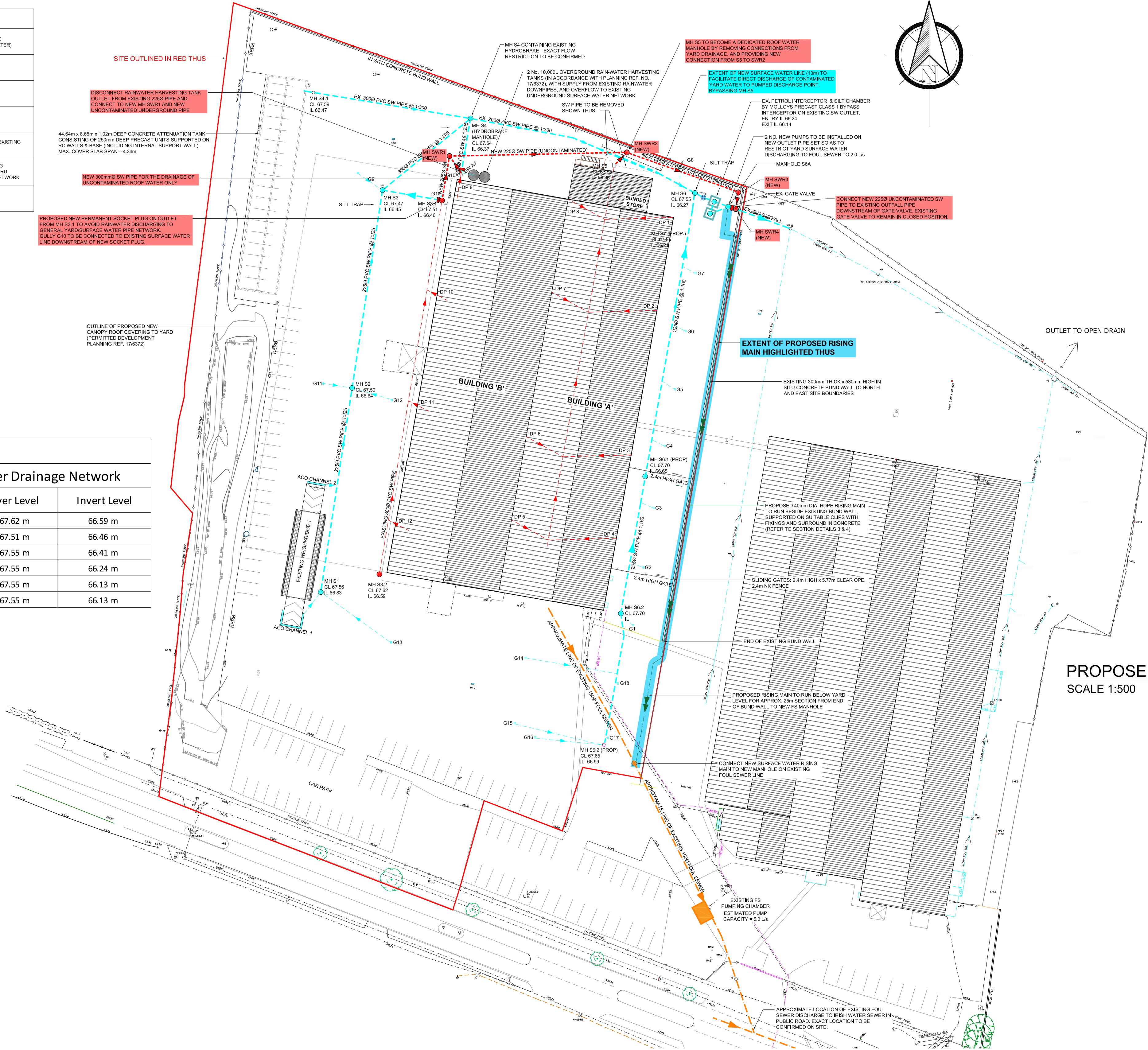
THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT CONSULTANTS DRAWINGS.

PIPES

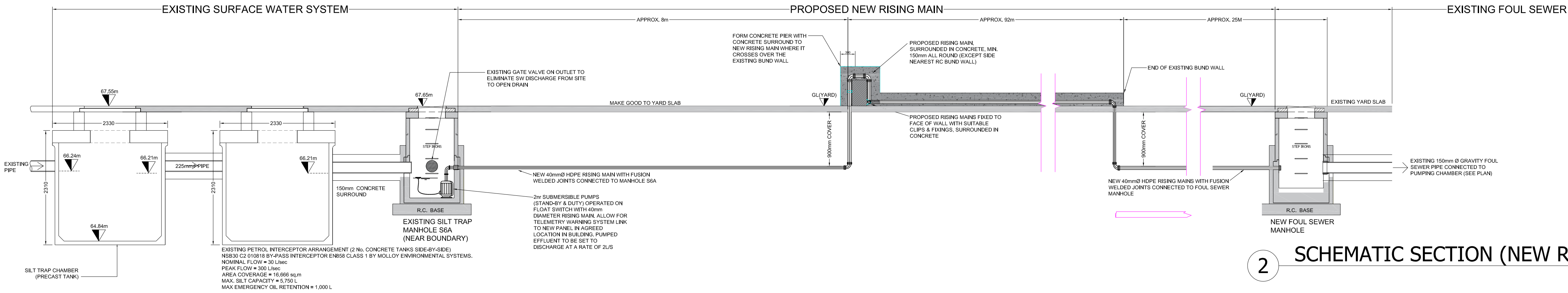
FOUL SEWER RISING MAINS TO CONSIST OF 40mmØ HDPE PIPE (COLOUR = BLACK WITH TWO ORANGE LINES) TO THE REQUIREMENTS OF IS EN 12201 INCLUDING COMPATIBLE PUSHFIT COMPRESSION FITTINGS AND OVERLAP WITH A TAPE CONTAINING A TRACER WIRE ALL IN ACCORDANCE WITH IRISH WATER REQUIREMENTS.

DEPTH OF COVER

ALL SEWER & RISING MAINS PIPES TO HAVE A MIN. 900mm COVER IN AGRICULTURAL LANDS/PUBLIC OPEN SPACES (WITHOUT ADDITIONAL PROTECTION MEASURES).



PROPOSED SITE LAYOUT PLAN (SURFACE WATER DRAINAGE)
SCALE 1:500



2 SCHEMATIC SECTION (NEW RISING MAIN)
Scale: 1:50

v6	29.09.2023	SEPARATION OF ROOF AND YARD SW	PK
Rev.	Date	Amendment	By

Issued For: EXEMPTION APPLICATION

Project:
KMK RECYCLING LTD.
EXISTING UNIT AT
ATHLONE ROAD, KILBEGGAN

Drawing Title:
PROPOSED SITE SERVICES
LAYOUT PLAN
(SHEET 1 OF 2)

Client:
KMK METALS RECYCLING LTD.
CAPINCUR INDUSTRIAL ESTATE
TULLAMORE, CO. OFFALY

MALACHI CULLEN
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SCALE @ A1= A5 SHOWN
DATE: AUG 2023
DRAWN: KOC
CHECKED: PK

Drawing Number:
15-097-24-P03
Rev. v6



3.6 Drainage

3.6.1 Foul Water

Sanitary wastewater from the site is discharged via a dedicated sewer line to the front of the installation to the Uisce Eireann wastewater treatment plant at Kilbeggan town. Rainwater from areas with the potential for contamination to occur will be directed via an oil interceptor to the Uisce Eireann foul sewer.

3.6.2 Surface Water

All rainwater from the clean yards and roof drains to an attenuation tank at the northwest corner of the site. Overflow from the tank discharges along drainage lines at the north of the site, to a silt trap and interceptor at the north eastern corner, before discharging to the adjoining premises. The water then discharges to a field drain.

3.7 Monitoring Infrastructure

Sampling and monitoring points are clearly labelled and safe and permanent access is provided to all on and off-site locations, as required by Condition 3.6 of the current licence.

3.8 Fire Control

KMK has adopted a Fire and Emergency Response Procedures (ERP). The ERP specifies roles, responsibilities and actions required to deal quickly and efficiently with an emergency.

Fire extinguishers are positioned at selected locations and staff are trained to extinguish small fires with appropriate hand held fire. If staff members cannot tackle a fire safely and effectively, the evacuation of all personnel will be the primary priority.

3.9 Fuel and Chemical storage

A self-bunded 2,500 litre diesel tank is located to the north of the building. A 2,200 litre kerosene tank is located on the second floor in Building A. Bund integrity testing is completed at 3-year intervals.

4. OPERATIONS

4.1 Site Management

The Facility Manager, who has the appropriate training and experience as required under the IE Licence, is responsible for day-to-day facility operations. All facility personnel are provided with appropriate training and have the requisite qualifications and experience to complete their assigned tasks.

4.2 Waste Types & Quantities

KMK Metals Recycling is licensed to accept all categories of waste electrical equipment (WEEE), (refrigerators, freezers, radiators, computer screens, monitors, lamps, light fittings, small IT and telecommunications equipment), Large Household Appliances (LHA) and Small Household Appliances (SHA); batteries, accumulators, large rechargeable electric cells; ferrous metals and materials containing metals e.g. industrial filters and extraction dust, KMK Kilbeggan however primarily accept LHA, Flat Panel Display screens and fridge freezers (temperature exchange equipment only).

The maximum annual intake will be 50,000 tonnes.

4.3 Operational & Waste Acceptance Hours

The waste acceptance and operational hours are 06:00 to 22:00 Monday to Friday inclusive and between the hours of 06:00 to 14:00 on Saturdays. The installation does not operate on Sundays or Bank Holidays without the agreement of the Agency.

4.4 Waste Acceptance

KMK has prepared documented waste acceptance procedures to ensure that only suitable wastes are accepted. The wastes are delivered by KMK collection vehicles and by third parties, including permitted waste collectors and commercial waste producers. The facility does not accept waste from either members of the general public, or from waste contractors that do not have a contract with KMK.

4.5 Site Processes

Specific metallic waste is accepted from industry and other off-site waste treatment facilities in accordance with the waste acceptance procedures. WEEE is treated in accordance to European Union (Waste Electrical and Electronic Equipment) Regulations 2014, Statutory Instruments S.I. No. 149 of 2014. Treatment Standards and recovery targets will be as per S.I. 149 Part 3, Section 22 ii (b) and Schedule 10. Preparation of WEEE for re-use is in accordance with Schedule 11. The waste is processed as follows;

Flat Panel Display (FPD) Unit Treatment

FPD units (comprising of televisions and monitors) are delivered to building A where they first undergo a manual dismantling activity. This entails putting the FPD unit onto a dismantling table, removing any external plugs and cables and the plastic stand. The plastic stand is sent to KMK Tullamore for recycling. LED units and FPD monitors are appropriately packaged, weighed and labelled in accordance with all relevant

transport regulations and loaded for outward transport to an authorised treatment facility by an approved haulier.

LCD TV units are placed onto the infeed conveyer of the Votchnik Trumaster-ALR machine. The machine is a fully automated, high through-put technology that can process sixty LCD TV units per hour. All processing is carried out at one central location at a rate of one LCD TV unit every sixty seconds.

Fines Treatment

A fines treatment process is located in building B, which comprises of feed hoppers, air table and a screen. This screen accepts waste fractions and separates them into smaller, uniform fractions, suitable for recycling on the air table. The air table uses a technology that will separate heavy (concentrated metal) and light (concentrated plastic) materials. The output materials generated from the process are metals and plastics.

Large Household Appliances (LHA) Treatment

Large Household Appliances are delivered to area building B and manually dismantled to remove the plug, cable, plastic, pump, motor, transformer and capacitors which are sent for storage to building B with the exception of plastic / wood top panels, rubber hosing, glass and concrete which are sent to Yard C. After removal of these fractions, the LHA carcass are baled in our eurobaler and stored in building B. The long term plan is to treat the material through BHS Shredder and sorting cabin, to manually and mechanically sort the shredded material into separate fractions of carcass, mineral waste (concrete, sand and glass mix), glass, steel (light iron), motor, cable and electronic components. These final fractions will be directed by conveyors to dedicated storage bays in Yard C.

Battery Treatment

The battery process will involve the acceptance of Mixed Batteries from Civic Amenity sites, Schools, B2B and Retail Businesses into our facility in KMK Kilbeggan. These batteries will be manually sorted through a picking line, segregating the batteries into their different chemistries, i.e. Alkaline, Lithium Primary, Lithium Ion, Lithium Metal, Nickel Cadmium, 6 Volt, Button Cells etc. The batteries will then be packaged into UN approved containers for export to authorised facilities in Europe for further processing. The battery process will also involve the acceptance of high voltage batteries from the auto industry as well as data centres. These batteries will be manually dismantled by KMK's High Voltage team and brought down to their individual Lithium battery packs. These will then be carefully packaged into UN approved containers for storage and safe export for further processing for recycling.

4.6 Operating Procedures

KMK has prepared a comprehensive set of Operating Procedures that cover all aspects of the day to day management of the installation and contingency measures. The procedures form part of the installation's Environmental Management System (EMS) and are subject to regular review based on operational experience, legislative changes and improvements in best practice.

4.7 Materials Management

The current licence requires the preparation and maintenance of a Materials and Waste Storage Plan. The Waste Storage Plan (WSP) is a dynamic document that varies regularly based on market conditions. It is not indicative of the exact tonnages of waste on-site at any moment in time and is instead a reflection of the maximum tonnage which could be stored on-site in accordance with the current WSP. A copy of the current Plan is in Appendix 1.

4.8 Health & Safety

KMK has adopted an Accident Prevention Policy and has prepared a Safety Statement for the installation that address hazard identification and risk assessment. All personnel and visitors are obliged to comply with site guidelines regarding access to and from the facility and on-site traffic movement. All staff members are provided with and are obliged to wear, personal protective equipment (PPE) appropriate for their particular functions. PPE includes facemasks, gloves, safety glasses, steel-toed footwear, overalls, reflective jackets and helmets.

4.9 Emergency Response

An emergency is an accident/incident that has the potential to result in harm to human health, damage to off-site assets and give rise to environmental pollution. The current licence requires the preparation of an Emergency Response Procedure (ERP) that identifies all potential hazards at the site that may cause damage to the environment and also specifies roles, responsibilities and actions required to deal quickly and efficiently with all foreseeable major incidents and to minimise environmental impacts. The current ERP is in Appendix 2 and this will be revised and updated during the commissioning stage.

In addition, KMK has documented procedure on the handling and storage of potentially polluting substances used at the facility, e.g. oils and the filling of tanks and mobile plant. The procedure describes how filling the fuel storage tanks and refuelling/servicing the mobile plant should be carried out to minimise the risk of accidental spills and ensure that if these occur there is a rapid and effective response.

4.10 Emissions

Emissions include vehicle exhausts, air emissions, dust, noise, sanitary wastewater from the staff toilets and rainwater run-off. The EPA licence sets out the control measures that must be applied to ensure these emissions do not cause pollution. The licence also requires surface water, air emission, dust deposition and noise monitoring at specified monitoring locations and sets emission limits that must not be exceeded.

4.11 Emission Controls

The current licence specifies the emission controls that KMK is obliged to implement to ensure operations do not cause environmental pollution and do not give rise to nuisance or impairment of amenity outside the site boundary. The controls are based on the requirements of the European Union BAT Reference Document for Waste Treatment (2018).

4.11.1 Noise

All waste reception and processing is carried out inside the buildings.

4.11.2 Surface Water & Groundwater

Condition 3.10 of the licence requires KMK to have an adequate supply of containment booms and/or suitable absorbent material on-site to contain and absorb any spillage at the facility. Once used the absorbent material must be disposed of at an appropriate facility

Condition 3.9 requires that all tank and drum storage areas must be impervious to the stored materials and that all storage areas be bunded, either locally or remotely, to a volume not less than the greater of the following:

- a) 110% of the capacity of the largest tank or drum within the bunded area; or
- b) 25 % of the total volume of substances, which could be stored within the bunded area.

4.11.3 Air

4.11.3.1 Dust

Waste processing will be carried out inside the waste transfer building. KMK cleans the paved yards and building floors regularly using a road sweeper and damps down the yard using hoses in dry periods.

4.11.3.2 Vehicle Exhausts

The diesel fuelled heavy goods vehicles based at the facility are fitted with Selective Catalytic Reduction (SCR) systems. A diesel fuel additive (AdBlue) is used in the SCR to reduce the nitrous oxide levels in the exhaust gases.

4.11.3.3 Point Emissions to Air

There are three direct emissions to air; A-1 is the dust extractor serving the fines treatment process building B; A-2 will be the dust extractor serving the shredding system in building B; and A-3 is the emission point from the Votchnik machine at the FPD area in building A. Each of these points will be monitored in accordance Licence conditions, points A-1 and A-3 are monitored in accordance with Schedule B and C of the current licence.

4.12 Nuisance Control

The site and immediate surroundings are inspected on a daily basis for litter inside and outside the installation boundary and if present it is removed. KMK have contracted a specialist pest controller who visits the site monthly to replenish vermin station bait boxes and will also call out to deal with insect infestation if they occur.

4.13 Environmental Monitoring Programme

The current monitoring requirements are as follows.

- Noise Annually
- Dust Deposition Quarterly
- Storm Water Daily (Visual Inspection) & Quarterly (Monitoring)
- Emissions to Air Various in accordance with Schedule C

4.14 Incidents

An incident is: -

- (i) an emergency;
- (ii) any emission which does not comply with the requirements of this licence;
- (iii) any exceedance of the daily duty capacity of the waste handling equipment;
- (iv) any trigger level specified in this licence which is attained or exceeded;
- (v) any indication that environmental pollution has, or may have, taken place.

In the event of an incident KMK is required to immediately:

- (i) carry out an investigation to identify the nature, source and cause of the incident and any emission arising therefrom;
- (ii) isolate the source of any such emission;
- (iii) evaluate the environmental pollution, if any, caused by the incident;
- (iv) identify and execute measures to minimise the emissions/malfunction and the effects thereof;
- (v) identify the date, time and place of the incident;
- (vi) notify the Agency and other relevant authorities

4.15 Complaints

All complaints are recorded in a Complaint Record. The information recorded includes: -

- Date and time of the complaint;
- Name of the complainant;
- Details of the nature of the complaint.

The EHS Manager or nominated Deputy Manager is responsible for its investigation and the implementation of any corrective measures. Where corrective actions are required KMK records the actions and informs the complainant.



4.16 Annual Environmental Report (AER)

The scope of the AER is set out in Schedule E of the current licence. The preparation of the AER involves a review of the progress in achieving the Environmental Objectives and Targets, reports on site development works, resource consumption, changes to existing or introduction of new operating procedures and an assessment of the impacts of site activities.



APPENDIX 1– WASTE STORAGE PLAN

KMK Metals Recycling Ltd.

Moate Road, Meeniska, Kilbeggan, Co. Westmeath, Ireland



WASTE & MATERIALS STORAGE PLAN

*For all waste, other feedstocks, other materials and wastewater stored and held at KMK
Metals Recycling Ltd.*

Document Prepared By:

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Environmental Quality Officer

Document Approved By:

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Operations Manager

Document Approved By:

Eamonn Pidgeon
Compliance Manager

This document is IMS document #454, Version 00; it will be reviewed and amended periodically, and all amendments will be recorded in the Review & Amendment History section.

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APPENDIX 1. WASTE STORAGE PLAN (DRAINAGE SUPERIMPOSED)ERROR! BOOKMARK NOT DEFINED.		

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1.0 INTRODUCTION

KMK Metals Recycling Ltd. operates a high-quality waste electrical and electronic equipment (WEEE) recycling facility at Moate Road, Kilbeggan, Co Westmeath. The facility operates under Industrial Emissions Licence Reg. No. P1076-01. The main activities carried out at the facility are the treatment of metals and WEEE wastes for the efficient recovery of materials for recycling.

2.0 PURPOSE

KMK Metals Recycling Ltd. acknowledges Condition 8.12 of Licence Reg. No. P1076-01. The purpose of this plan is to comply with Sub-Condition 8.12.1 which states; *‘The licensee shall, within three months of the date of grant of this licence, develop and thereafter maintain and implement a Waste and Materials Storage Plan for all waste, other feedstocks and other materials and wastewater stored and held at the installation’*. This plan will also address points (i) to (ix) of Sub-Condition 8.12.4.

3.0 SCOPE

This plan applies to the KMK Kilbeggan facility, licenced under Reg. No. P1076-01. It addresses the requirements of Condition 8.12 of the licence.

4.0 PLAN

Sub-Condition 8.12.4 details a number of requirements that must be complied with by the licensee. **Table 1** below refers to each direct requirement of the condition and demonstrates KMK’s compliance with same.

Table 1. Compliance with Sub-Condition 8.12.4

Sub-Condition 8.12.4 <i>The Waste and Material Storage Plan shall incorporate:</i>	Demonstration of Compliance
<i>(i) – the recommendations of the Fire Risk Assessment required by Condition 9.5 of this licence;</i>	Please refer to Section 4.1 below.
<i>(ii) – a limit on the total quantity of waste to be stored at the installation at any one time;</i>	Please refer to Section 4.2 below.
<i>(iii) – maximum stockpile sizes in designated storage areas or vessels including maximum volume, height, length, width and area, and minimum separation distances;</i>	Any stockpiles of waste at the KMK Kilbeggan facility is confined to; 1) stacks of steel bales inside and 2) stacks of palletised LHA inside prior to treatment. These are all stored less than 4 metres

	in height and less than 20m in length and are separated by a minimum clearance of 6 metres in accordance with the Fire Risk Assessment. All other wastes are stored on/in FIBCs, pallets, containers, boxes, skips, receptacles, trailers, shipping containers.
<i>(iv) A limit on the maximum storage or holding period for each type of waste in designated storage areas or vessels;</i>	In relation to the three ‘waste-to-energy’ (W2E) skips, as can be seen in Appendix 1, these are the only waste skips/containers that holds waste which may contain some organic material e.g. municipal waste contamination from incoming fridge and freezers, general internal waste, in addition to waste plastics and debris. These skips are generally turned around every 3 to 5 days. All other waste stored are metallic-based and are not subject to degeneration or degradation over time and as such can be stored for periods of weeks to months if required without any environmental impacts. In accordance with the WEEEELABEX Standard KMK complies with, the maximum amount of WEEE stored shall not exceed the amount of WEEE that can be treated within six months. All shredded metal wastes are removed off-site weekly.
<i>(v) – limitations, as may be necessary, on waste storage arrangements to be used to prevent odours arising;</i>	The profile of WEEE wastes accepted at the facility are not known to be malodorous. Therefore, odours are not expected to arise at the facility. As previously mentioned, all W2E skips which may contain some unwanted organic matter are removed from site within 3 to 5 days.
<i>(vi) – a drawing or plan of the location of each waste type and the means of storage for each waste type (e.g. as loose waste, baled, in sealed containers);</i>	Please refer to Appendix 1 for this plan.
<i>(vii) – details of the drainage system superimposed on the above drawing or plan;</i>	Please refer to Appendix 1 for this plan.

(viii) – a designated fire quarantine area;	A designated enclosed ro-ro skip/ fire cabinet will be located on-site at Yard C (see Appendix 1) to act as a fire quarantine area for any material to be securely placed into and extinguished in the event of fire.
(ix) – details of the reception, unloading and inspection areas as well as any temporary storage requirements.	Please refer to Section 4.3 below.

4.1 Fire Risk Assessment Recommendations

A Fire Risk Assessment (FRA) was undertaken by ORS at the KMK Kilbeggan facility on 03/02/2021, in accordance with Condition 9.5 of the IE Licence. The accompanying report issued shortly thereafter detailed the following recommendations:

“On the basis of this risk assessment and 2-yearly inspections from the local fire service, the operator has taken sufficient action to implement an adequate level of fire safety at the site hence no immediate corrective action is recommended at this point in time.

It is noted that further works are scheduled for completion as part of planning application no. 176372 (Westmeath County Council). It is recommended that this Risk Assessment is reviewed with the scheduled works are complete.”

The outstanding works mentioned as part of planning application no. 17/6372 include roofing of Yard C, construction of a new MV substation building and a new vehicular and pedestrian entrance to site from the R446. KMK will ensure that the FRA is reviewed following completion of these scheduled works and this plan suitably updated with any further recommendations.

The recommendations of the FRA have been reviewed and compared with the waste handling and storage on-site. There is no conflict between the FRA and waste/materials storage. Each waste stream is less than 4 metres in height, less than 20m in length and are separated by a minimum clearance of 6 metres.

4.2 Waste Types, Quantities and Limits

The Environmental Quality Officer in conjunction with the Operation & Production Manager and Facility Manager conducted a site walkover inside and outside to verify all existing operations at the facility as part of the development of this plan.

Once the waste and materials were deemed acceptable in their storage and processing areas, this information was then mapped. All waste and materials are allocated maximum storage values within their storage area.

In relation to the wastes and materials mapped in **Appendix 1**, the following maximum storage values apply as referred to in **Table 2**.

Table 2. Waste Descriptions and Estimated Maximum Tonnages in Storage

Ref	Waste Description	Average Weight / Volume	Number of Units	Total Weight (Tonnes)
1	Waste to energy (W2E) (ro-ro type)	10 tonnes	3	30
2	Light iron skip (ro-ro type)	8 tonnes	1	8
3	Metal Shred skip (ro-ro type)	8 tonnes	3	24
4	Metal stands skip (ro-ro type)	8 tonnes	1	8
5	Mixed WEEE skips (closed type)	4 tonnes	2	8
6	Fridge freezer trailers	8 tonnes	6	48
7	Mixed WEEE trailers	8 tonnes	2	16
8	Steel bale trailers	25 tonnes	3	75
9	Glass/Metal mix in covered FIBCs	0.9 tonnes	40	36
10	Clean treated plastics in FIBCs	0.6 tonnes	50	30
11	Incoming whole LHA loose items	Various	Various	170
12	Steel bales in storage inside	0.6 tonnes	260	156
13	LHA Metals (in FIBCs)	0.9 tonnes	28	25
14	Incoming Fines in FIBCs	0.8 tonnes	35	28
15	SHA in storage inside in cages	0.25 tonnes	30	7.5
16	Metal fractions in FIBCs	1.5 tonnes	18	27
17	Whole FPD units in cages	0.3 tonnes	78	23
18	Whole FPD units in containers for export	25 tonnes	2	50
19	IT, Metals storage	Various	Various	80
20	Clean pallets for use	Various	Various	40
21	FPD Fractions	Various	Various	30
22	Whole FPD units inside (treated)	Various	Various	30
23	Gas oil tank	2500 litres	1	2.5
24	Kerosene oil	2200 litres	1	2.2
25	Cardboard (flat pack boxes)	Various	Various	6

26	Waste liquid from LHA bund (IBC's)	1000 litres	2	2
27	Quarantine wastes/materials	Various	Various	1
28	Waste Liquid from Water Table (IBC's)	8000 litres	9	9
29	FPD Plastics skip (ro-ro type)	5 Tonnes	1	5
30	Concrete waste skip	15 Tonnes	1	9
31	Glass waste skip	15 Tonnes	1	9
32	Apple shred skip	8 Tonnes	1	8
Total				1,003 T

4.3 Reception, Unloading and Inspection Areas incl. Temporary Storage Requirements

Waste shall only be accepted between the hours of 06:00-22:00 Monday to Friday inclusive and 06:00 – 14:00 on Saturdays. All waste is correctly classified by LoW Code in compliance with Table A.2.2 of the facility IE Licence prior to or during waste acceptance.

The driver/sub-contracted haulier transports and delivers the waste to site, receiving a weight reading at the incoming's weighbridge. All incoming waste is offloaded outside and directly transferred inside to reception areas of the buildings for inspection and processing. In terms of fridge/freezers, these are off-loaded outside, checked for contamination (e.g. perishable foods left inside on occasion) are removed, before being directly transferred to enclosed trailers for export off-site. A contingency weatherproof storage area will be established for fridge/freezers later in 2026 to accommodate any excess units in the event of a shortfall in trailers. All waste processing occurs inside the facility buildings. If the material presented is found to be non-conforming at any time after it has entered the site, it shall be immediately quarantined for further inspection and removed off-site.

WEEE storage (incl. temporary storage) is in compliance with Section 21 and Schedule 8 of S.I. No. 149/2014 - European Union (Waste Electrical and Electronic Equipment) Regulations 2014. Outside storage of wastes only takes place in enclosed artic trailers, shipping containers or large skips on concrete impermeable surfaces. All hazardous WEEE is stored within buildings and/or enclosed vessels/containers.

In accordance with the WEEEELABEX/CENELEC Standards KMK complies with, the maximum amount of WEEE temporarily stored shall not exceed the amount of WEEE that can be treated within six months.

5.0 RESPONSIBILITIES

It is the responsibility of the Compliance Department to ensure this document is up-to-date and reviewed / amended as required e.g. in the event of a change to operations on-site. For this reason, input from operations management is also key to the success and validity of this plan.

6.0 REFERENCES

201-PRO-IMS *Control of Documents Procedure*

202-PRO-IMS *Control of Records Procedure*

454-REC-IMS *Waste Storage Plan*

External:

- *Condition 8.12 of Licence Reg. No. P1076-01.*
- *ORS Fire Risk Assessment Report (Doc No.: 211_025-ORS-XX-XX-RP-EN-13d-001)*

7.0 REVIEW AND AMENDMENT HISTORY

This document must be controlled in accordance with the Control of Documents procedure and reviewed:

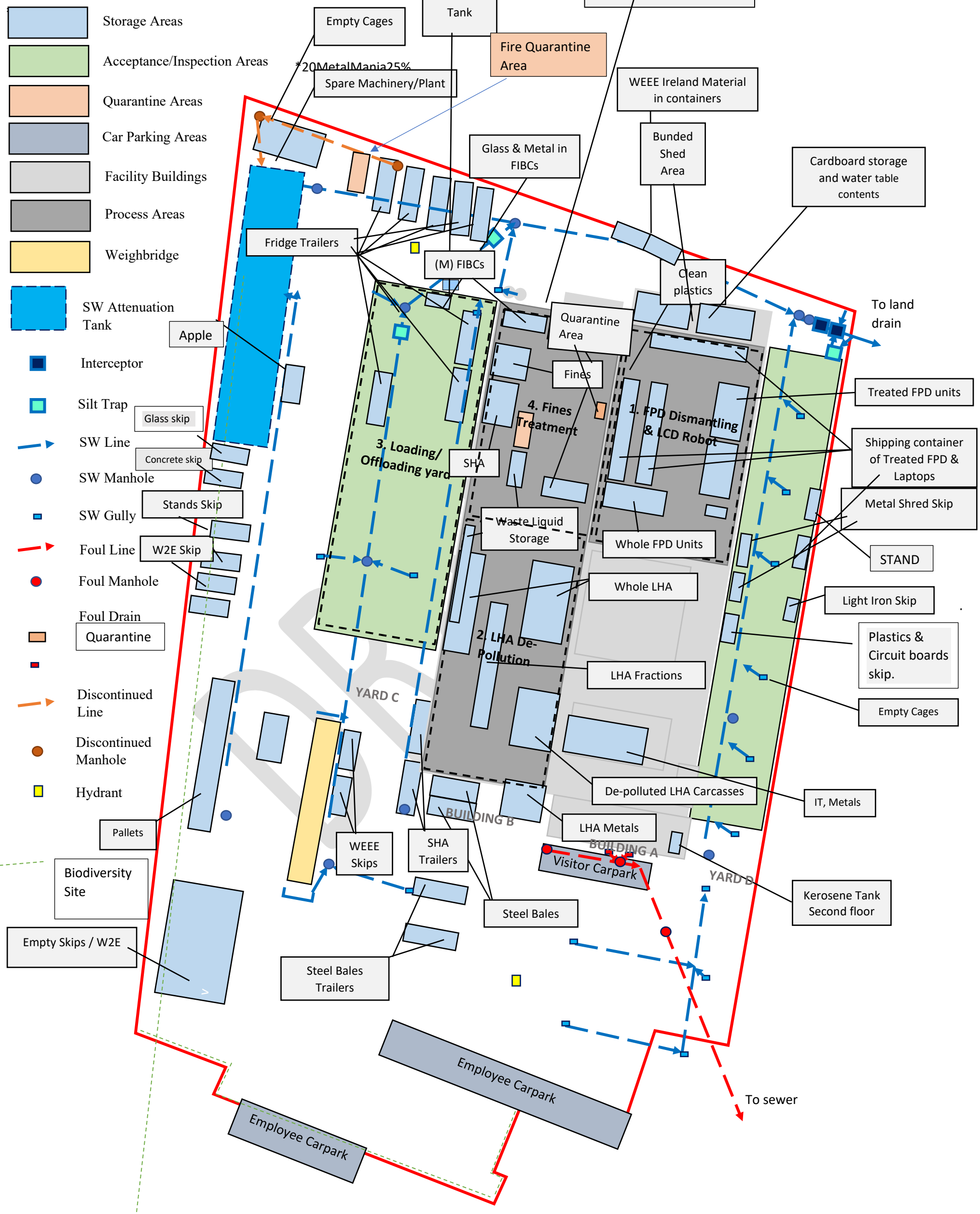
- at least once every year;
- more frequently if required in order to ensure validity;
- in event of a change of practice relating to the Waste & Materials Storage Plan.

All changes made to this document must be recorded in the table below:

Paragraph(s)	Description(s)	Date	Signature	Version
All	Original Release.	10/02/2021	N. Nally	00
All	Update of Waste Storage Plan	10/05/2022	E. Pidgeon D. Finane	01
All	Further update of Waste Storage plans with some minor edits and additions. Update to map also.	15/07/2022	E. Pidgeon D.Finane	02
Map	Updated map to reflect new permanent plastics and circuit board skip on yard D.	23/01/2024	D.Finane	03
All	Removed Eamonn Pidgeon as a preparatory for the document on page 1 and updated his role and title from EHS Specialist to Compliance Manager. Added two new skips, plastics and concrete to table 2 list. Changed the total tonnage from 862.7T to 882.7T to reflect the weight of the two new skips. Updated the map to reflect new concrete skip on yard C.	05/03/2024	D.Finane	04
All	Included the fire cabinet in section 4 Table 3. Compliance with Sub-Condition 8.12.4. Added glass skip to table 2 and to Appendix 1 Map. Updated tonnage for both concrete and glass skips and the total tonnage. Updated the planned year for providing a contingency weatherproof storage area for fridge/freezers from 2023 to 2026.	14/03/2025	D.Finane	05
All	Edited the map by removing the batteries container in yard C as no longer in use, added the apple skip and moved empty skips to near biodiversity area, W2E skips are also left there sometimes. Removed timber and grit ro ro skips from table 2 in section 4.2. Added in apple skip to table 3.1 changing the overall total.	16/06/2025	D.Finane C. O'Brien E. Pidgeon	06

APPENDIX 1. WASTE STORAGE PLAN (DRAINAGE SUPERIMPOSED)

Legend:





APPENDIX PROCEDURE

2–

EMERGENCY

RESPONSE

Facility Emergency Response Procedure (Kilbeggan)

Emergency Services Telephone Number: **112 or 999**

Distribution

KMK Management
Customer Care & Logistics Department
Production & Operations
General Operatives

Compliance Department
Finance Department
Site Supervisors
Office Staff

1.0 PURPOSE

The purpose of this procedure is to outline the steps that should be taken as well as the responsibilities of employees in the event of an emergency at a KMK Metals Recycling facility i.e., **Fire, Hazardous Spill / Release or Accident**.

2.0 SCOPE

KMK Metals Recycling are committed to ensuring the safety, health & welfare of all persons carrying out KMK-related activities. This procedure applies to all employees located at KMK Kilbeggan. It also applies to any non-employees (such as visitors and contractors/sub-contractors) who may be on-site in the event of an emergency.

The main emergency situations associated with KMK Metals Recycling are:

- Fires,
- Hazardous Spills / Releases (i.e., fuels, oils), and.
- Accidents.

Please note: The procedure detailed herein for accidents is only to be used as a “first response” guide. A separate and fully comprehensive **Work-Related Accident Procedure** is documented within the IMS to further detail the actions required in the event of a work-related accident and should be consulted for further information.

Road Traffic Accidents are separately addressed in the **Off-site Emergency Response Procedure**.

Additional emergency response procedures can be found in KMK’s **Business Continuity Plan**. This document provides a framework of emergency action principle and policies to be followed in an emergency situation by those involved in the management of such an incident.

3.0 PROCEDURE

KMK Metals Recycling have identified three main on-site emergency situations: Fires, Hazardous Spills / Releases and Accidents. The steps detailed herein are appropriate to activities at KMK Kilbeggan.

This procedure to be followed in the event of an emergency is also documented in KMK’s **Safety Statement**, which is made available to all employees, visitors and contractors/sub-contractors. It is

imperative that KMK employees make themselves familiar with their individual responsibilities as part of this procedure and carry out the steps as follows in an emergency event.

3.1 Emergency Response Procedures

3.1.1. Fire Response

- Raise the Alarm **IMMEDIATELY** (Press the button on the Call Point box fixed on the wall at most emergency exits).



Tackling the Fire:

NEVER attempt to fight a fire unless you are trained in the use of firefighting equipment.

NEVER put yourself at risk.

ALWAYS make sure you have a safe exit route.

- **ONLY IF YOU HAVE RECEIVED TRAINING** - Extinguish the fire if it is safe to do so.
 - Bring a suitable fire extinguisher to within six feet of the fire.
 - Use the P-A-S-S procedure to operate the fire extinguisher:

P = **PULL** (Pull the pin / break the seal)

A = **AIM** (Aim at the base of the fire)

S = **SQUEEZE** (Squeeze / press the handles together)

S = **SWEEP** (Sweep from side-to-side at the base of the Fire until it is out)

All other employees not trained in the use of fire extinguishers (or in the event of a large/out of control fire) or the fire does not shortly appear to be extinguished through use of firefighting equipment:

- Proceed immediately to the designated Fire Assembly Point (See *Appendix 2* for the Assembly Point Location). **DO NOT RUN**. Close windows and doors behind you if possible (to slow the spread of fire).
- All workers are to leave their work area and assemble with their team at the designated Assembly Point.
- Trained Fire Wardens will ensure the premises are fully evacuated (KMK employees and non-employees), only if safe to do so.
- The Fire Warden will instruct someone to check the Emergency Services are on their way (Call 112 or 999) if deemed necessary. **Note:** From Office Phones you need to dial 9 first to get an outside line.

- Give a **Mobile Telephone Number** (not an Office Number as it may be unsafe to attend to Office Phones due to fire or smoke).
- Give the correct **Address**: KMK Metals Recycling Ltd, Moate Road, Meeniska, Kilbeggan, Co. Westmeath, Eircode: N91 PT78
- Give brief explanation of the **incident** and any **injuries**.
- A roll call will be carried out at the assembly point (by the Nominated roll call person). All employees should say clearly out loud their name.
- A check will be made as to whether visitors and subcontractors on-site are present and accounted for; consult the Site Safety Rules Sign-in folder to be taken from reception.
- Two employees with a mobile phone will be noted on the roll call and sent to stop incoming traffic (only if safe to do so) and check the route is clear for the Fire Brigade who should be directed to the fire.
- Shut off valve is no longer in use therefore does not require employees to attend to.
- Inform the Fire Brigade on arrival of any missing persons. **DO NOT** re-enter any area of the facility to look for missing persons. THE SITE IS NOW UNDER CONTROL OF THE FIRE SERVICE.
- Be patient and obey all instructions given. Only when it has clearly been stated by a Fire Warden / Fire Brigade (if present) that it is safe to return to the workplace, may employees return to work.
- The two employees sent to stop incoming traffic should be contacted and called back.
- The company who monitors KMK's Fire Detection System will contact KMK to check the situation is under control.
- The EHS Officer shall fully record the event in the **Fire Log** (also the **Occurrences Register** in the event of a true fire) and put corrective actions in place along with any recommendations for improved fire response.
- Employees must report all used fire extinguishers immediately to the EHS Officer so that they can be replaced with temporary replacements and refilled.
- Management shall determine in consultation with the Compliance Department whether notification to the public and other agencies is necessary.

3.1.2. Out of office hours emergency response procedure

Raise the Alarm **IMMEDIATELY** (Press the button on the Call Point box fixed on the wall at most emergency exits).



- **ONLY IF YOU HAVE RECEIVED TRAINING** - Extinguish the fire if it is safe to do so.

- Bring a suitable fire extinguisher to within six feet of the fire.
- Use the P-A-S-S procedure to operate the fire extinguisher:

P = **PULL** (Pull the pin / break the seal)

A = **AIM** (Aim at the base of the fire)

S = **SQUEEZE** (Squeeze / press the handles together)

S = **SWEEP** (Sweep from side-to-side at the base of the Fire until it is out)

All other employees not trained in the use of fire extinguishers (or in the event of a large/out of control fire) or the fire does not shortly appear to be extinguished through use of firefighting equipment:

- Proceed immediately to the designated Fire Assembly Point (See *Appendix 2* for the Assembly Point Location). **DO NOT RUN**. Close windows and doors behind you if possible (to slow the spread of fire).
- All workers are to leave their work area and assemble with their team at the designated Assembly Point.
- Trained Fire Wardens will ensure the premises are fully evacuated (KMK employees and non-employees), only if safe to do so. The Fire Warden is to also note any person who may still be inside on the roll call.
- The Fire Warden will instruct someone to check the Emergency Services are on their way (Call 112 or 999) if deemed necessary. *Note: From Office Phones you need to dial 9 first to get an outside line.*
 - Give a **Mobile Telephone Number** (not an Office Number as it may be unsafe to attend to Office Phones due to fire or smoke).
 - Give the correct **Address**: KMK Metals Recycling Ltd, Moate Road, Meeniska Kilbeggan, Co. Westmeath, Eircode: N91 PT78
 - Give brief explanation of the **incident** and any **injuries**.
- A roll call will be carried out at the assembly point (by the Nominated roll call person).

- Access will be granted to the Timepoint system to assigned staff to complete a roll call of staff on-site. Dedicated roll call as listed in responsibility section.
- In the unlikely event that the Timepoint System is unavailable, wardens are to use the Weekly Roster, a copy of the weekly roster shall be made available at reception on the wall beside fire alarm panel at the end of every week (for the following week).
- All employees should say clearly out loud their name.
- A check will be made as to whether visitors and subcontractors on-site are present and accounted for; consult the Site Safety Rules Sign-in folder to be taken from reception.
- One employee with a mobile phone will be noted on the roll call and sent to stop incoming traffic (only if safe to do so) and check the route is clear for the Fire Brigade who should be directed to the fire.
- Inform the Fire Brigade on arrival of any missing persons. **DO NOT** re-enter any area of the facility to look for missing persons. THE SITE IS NOW UNDER CONTROL OF THE FIRE SERVICE.
- Be patient and obey all instructions given. Only when it has clearly been stated by a Fire Warden / Fire Brigade (if present) that it is safe to return to the workplace, may employees return to work.
- The employee sent to stop incoming traffic should be contacted and called back.
- The company who monitors KMK's Fire Detection System (GGL) will contact KMK to check the situation is under control.
- The EHS Officer, shall fully record the event in the **Fire Log** (also the **Occurrences Register** in the event of a true fire) and put corrective actions in place along with any recommendations for improved fire response.
- Employees must report all used fire extinguishers immediately to the EHS Officer so that they can be replaced with temporary replacements and refilled.
- Management shall determine in consultation with the Compliance Department whether notification to the public and other agencies is necessary.

3.1.3. Out of Business Hour Fire Response

- In the event of an alarm activation outside of office hours, a notification will be sent to KMK's External Monitoring Company (GGL Security).

- GGL will monitor the cameras and look for evidence of a fire. If a fire is detected on the cameras, they will notify the Fire Department immediately.
- The monitoring company will notify the Security Team, who will be called to investigate the site.
 - Response time will vary depending on location and time of day. The target response time is <15 mins.
 - On arrival to site, the Security Team will check the database for any special instructions.
 - Never enter a premises unless you feel that it is safe to do so.
 - Locate the fire alarm panel which will indicate the activation location.
 - If there is no obvious sign of fire, put the alarm on silent.
 - Proceed with caution and check the area (listed on the fire alarm panel screen) to determine the cause of activation.
 - In the event of a fire, evacuate the building and call the emergency services.
 - Do not allow anyone to re-enter the building until the emergency services arrive.
 - In the event of a false alarm, reset the fire alarm panel.
 - Leave a note explaining the details of the activation.

3.1.4. Spill response

KMK aims to prevent hazardous spills/releases to the environment, and it is strict procedure that all spills are cleaned up without delay.

In the unlikely event that liquids are received at KMK Kilbeggan, they shall be transported to KMK Tullamore for appropriate handling and storage.

All liquids must be stored in suitable containers on top of bunds or in bunded areas.

There is also a chemicals cabinet onsite where liquids can be temporarily stored.

Dusts must be contained at all times (i.e., in FIBCs) and not allowed to be emptied on KMK's yard surfaces, where rain could wash any residues into KMK's drainage system.

- Before dealing with any spill, ensure the area is safe.
- Ensure you wear the correct PPE before handling any spilled material.

The KMK facilities are equipped with spill kits filled with absorbent for the purpose of cleaning up any spills. Absorbent booms and mats can be found in Building A (*please refer to site map in Appendix 4: EMERGENCY SCHEMATIC LAYOUT OF KMK*).

In the event of a small work area spill:

- Take a scoop of clean absorbent powder.
- Sprinkle the powder over the spill.
- Remove the powder to a 'used absorbent barrel' when the spill is soaked up.
- Repeat as necessary until the spill is completely soaked up.
- For old spills, where liquid has dried, wet the liquid and scrub with a brush, then apply the powder to soak up the scrub water.

In the event of a moderate spill:

- Identify the source of the spill and close it off immediately.
- Report the incident to the area Supervisor and Environmental quality officer.
- Use the absorbent filled spill kit bins and other absorbent mats, booms and equipment available to contain and absorb the spill. Consider moving the 'used absorbent barrel' to the spill location first.
- The liquid must be contained as far as practicable by employing absorbent, booms and mats around drainage gullies and the liquid spill itself.

- Any spill must be cleaned up immediately to prevent contamination of surrounding areas and to prevent injury / accident by a slip / skid / fall.
- Used absorbent and other equipment must be disposed of in the 'used absorbent barrel'.
- All oil must be removed from the surface by either pumping or use of absorbent mats. All waste oils and materials must be disposed to an appropriate facility.

In the event of a major spill:

- If there is a major spill, inform the area Supervisor and Compliance team immediately. Operatives should work together in pairs immediately to prevent the source of the spill entering the drainage network using absorbent, mats, and booms.
- A member of the compliance team will instruct operatives to assist in bringing the shut-off valve lever to the surface water sampling manhole labelled 'SW1', along with a manhole lid lifter bar.
- The manhole cover at SW1 shall be lifted, and the valve lever inserted into the shut-off valve and turned 'ANTI-CLOCKWISE' to close the shut-off valve. This prevents escape of contamination off-site.
- Once the emission point SW1 has been closed, continue to contain the spill using the supplies available.
- Put matts and booms in place at all required area entrances/exits to enclose the spill.
- Place sealant matts on any drains not associated with the site that may be in danger of contamination.
- If oil or any other liquid is spilled on a concrete or tarmac surface, use the spill kit to absorb the liquid as soon as possible and then remove all used spill kit to a bin / drum for used spill kits.
- If oil enters the surface drainage gullies, there will be some protection provided by the oil interceptor unit and silt traps first. Most importantly, the final discharge outlet being shut off will prevent contamination escaping the site. The corner of the yard at the interceptor has a 1-meter-high retaining pre-cast concrete wall which will assist in holding liquid in that area.
- If any other liquid enters the surface drainage gullies then similarly, the final discharge outlet being in the shut off position will prevent contamination escaping the site.
- All oil must be removed from the surface by either pumping or use of absorbent mats. All waste oils and materials must be disposed of by an appropriately authorised facility.
- Any contaminated water within the drainage network shall be removed by an appropriate contractor prior to the shut off valve being re-opened along with a thorough jetting and cleaning. The shut-off valve lever and manhole lid lifter will be returned to the safe storage area on-site afterwards.

- KMK's Compliance Department will communicate with all relevant authorities without delay on any such incidents.
- REMEMBER!
 - CLOCKWISE direction = OPEN position for the shut-off valve
 - ANTI-CLOCKWISE direction = CLOSE position for the shut-off valve

3.1.5. Accident Response

The term "Accident" means any accident, no matter how small, which results in personal physical injury, which happened during work time and as a result of work activities.

In KMK Kilbeggan, a list of trained First Aiders is available in the various locations such as the First Aid Room and canteen notice boards. Supervisors and a number of other key staff members have received First Aid Training, which includes the use of a Heart saver AED (Automated External Defibrillator).

A fully stocked First Aid Kit is stored in the First Aid Room, and is subject to weekly check / refills, as necessary.

Defibrillator is now located at reception opposite administration/weighbridge office, mounted to the wall in an AED protective unit.

Employees and visitors, including contractors, are required to co-operate in the accident reporting process, as follows:

- A witness to an accident should not attempt to move any ill/injured person unless it is to remove him or her from immediate danger. The area should be evacuated and, depending on the severity of the accident, a First Aider or the emergency services should be called immediately.
- All work-related accidents, no matter how small or injurious must be reported to a First Aider and it is the joint responsibility of the First Aider (and the ill/injured person, if the circumstances permit) to ensure that the work-related accident is reported to the area Supervisor and EHS Officer on the day the accident occurred or at the soonest available opportunity.
- Accept assistance from a First Aider who shall perform basic first aid; clean, sanitise, and cover wounds. First Aiders should follow the guidance provided to them when administering First Aid

Wash your hands and make sure all helping hands are clean.

- Cover up any open cuts and grazes on yourself with waterproof dressing.
- Wash the wound under running water.
- Dry the wound.

- Sanitise the wound by wiping thoroughly with a hygienic wipe from the first aid box.
- Let the wound dry in the air for no longer than a minute.
- Dress (cover) the wound with a plaster/bandage from the first aid box.
- Make sure all open wounds are covered at all times.
- Repeat steps 4-6 daily until the wound has healed.
- Report the Accident to the area Supervisor and EHS Officer ^{Note 1, 2, 3 & 4} will contact the Company GP if deemed necessary by the employee and the First Aider.
 - **Note 1:** When outside of normal office hours, the First Aider of the ill/injured employee must make sure the accident is reported to the area Supervisor and/or EHS Officer at the next available opportunity.
 - **Note 2:** If the ill/injured employee is seriously ill/injured they may be taken directly to A&E by a First Aider. This particularly applies when outside of company doctor working hours.
 - **Note 3:** If it is unsafe to move the ill/injured employee, ring the hospital: telephone 999 or 112, or if dialling from an office phone 9-999 or 9-112. A First Aider must remain with the ill/injured employee at all times.
 - **Note 4:** An e-mail communication/calendar entry must be created as soon as an accident has been reported to the Compliance Department to include the EHS Officer, Managing Director, Finance Department, Compliance Manager and Area Supervisor.
- A **Work-Related Accident Report Form** must be completed by the EHS Officer with the ill/injured person and any witnesses as this might result in a change in procedure / risk assessments / PPE that prevents a more serious accident occurring in the future.
- Accident reports are maintained on file in the Compliance Department and used in the review of Risk Assessments. Accident Reports are confidential; the information they contain will not be shared with employees who are not KMK Management; personal details will not be shared with any organisation other than the Health and Safety Authority.
 - The choice made by an ill/injured person not to report an accident renders KMK Metals Recycling Ltd. not responsible for any medical treatment, including at a later date for example, if a wound becomes infected.
 - Where false or misleading information is given in relation to the accident investigation, the 'Absence due to Work Related Physical Injury Policy' contained within the **Employee Policies** handbook will apply.
- At the Doctors / Hospital:

- The ill/injured employee shall obtain a sick cert. The company doctor may forward this to KMK on behalf of the individual. If the ill/injured employee is referred to the hospital, any correspondence must be obtained from the company doctor. All sick certs must be handed in to the Finance Department as soon as they are received and no later than Monday AM following the work-related accident. The Social Welfare cert (if applicable) must also be submitted to the Finance Department on the 6th day following the work-related accident. The EHS Officer will request off the Company G.P. that this is handed to the employee on the 6th day of absence and the employee is responsible for ensuring that this is completed and brought into the Finance Department.
- Medical appointments resulting from work-related accidents must not be of any financial cost to the employee. For any work-related medical appointments and medical care incurred thereafter the employee will be financially reimbursed, with the provision of any relevant medical certificates and/or receipts.
- Management shall determine in consultation with the Compliance Department whether notification to the public and other agencies is necessary.

Returning to Work:

If the injured employee has been absent from work for a prolonged period of time due to the injury the ***Return-to-Work Procedure*** must be consulted and followed out in full following completion of the accident investigation.

The injured person shall not return to work any sooner than stated on the Sick Cert. An employee can only return to work if they have been seen by the company doctor and are certified (in writing) as 'Fit to Work'.

- Inform the company as to when you expect to return to work.
- If the person is well enough to return on the date given on the Sick Cert, he/she must:
- Bring the Sick Cert, Fit to Work document and Social Welfare Form (if applicable), signed, and stamped by the company doctor to the Finance Department prior to their return to work.
- He/she must report to the Compliance Office to complete the ***Work-Related Accident Report Form*** (if not already done).
- When the Finance Department has received the correct documentation, the employee may return to work and report to the EHS Officer, the area supervisor and the Managing Director (if available) for completion of a Return-to-Work Interview.

- The ***Return-to-Work Interview Form*** will be filled out in full and will determine the structure of the interview. The operator will be given the opportunity to appoint a person of their choice to attend this meeting.

3.2 **Emergency Response Testing**

3.2.1. **Testing Fire Response**

Fire Response is tested by a fire drill on at least a quarterly basis. Records of fire drills are maintained in the ***Fire Safety Information*** folder. Fire Drills are timed, and recommendations arising are listed; these are based on comparison of the planned response versus the actual response. Fire Response Testing may include any combination of:

- Testing knowledge of the intended procedure.
- Testing actions taken versus the intended procedure.

Fire Response is also tested using ***Emergency Response Drills*** on at least a quarterly basis ensuring staff are familiar with the correct procedure to be followed in event of a fire. Response will typically be tested by outlining a scenario which caused a fire and asking the employee how they would respond. Test reports are documented as ***Internal Audits*** and any recommendations or corrective actions arising from the audit are tracked to closure in the ***Occurrences Register***.

3.2.2. **Testing Accident Response**

There are a number of trained First Aiders at the facility. Accident response testing is done on at least a quarterly basis and will include ensuring staff (including First Aiders) are familiar with the correct procedure to be followed in event of accident / injury to themselves or others. Test reports are documented as ***Internal Audits*** and any recommendations or corrective actions arising from the audit are tracked to closure in the ***Occurrences Register***.

3.2.3. **Testing Spill Response**

Spill Response is tested using ***Emergency Response Drills*** on at least a quarterly basis. Response will typically be tested by:

- placing a puddle on the floor, or,
- by picking liquids on-site and outlining a scenario which caused the liquid to spill, and,
- asking employees how they would respond to a spill and documenting the response.

Test reports are documented as ***Internal Audits*** and any recommendations or corrective actions arising from the audit are tracked to closure in the ***Occurrences Register***

4.0 RESPONSIBILITIES

KMK Compliance Department are responsible for communicating this procedure to all new employees. The Compliance Department is responsible for ensuring the below listed people understand their roles and duties.

It is the responsibility of all KMK employees to make themselves familiar with the steps of this procedure.

KMK employees with visitors / contractors / sub-contractors organised on-site should ensure they initially sign the *Visitor Site Safety Rules (Dotser Software Tablet Device)* at reception and are directed towards the nearest assembly point in the event of a fire.

It is the responsibility of all KMK employees to ensure that all fires, no matter how small, all accidents and all moderate/major spills are reported to the Compliance Department via EHS Officer and Environmental Quality officer.

It is the responsibility of the designated checker to ensure that weekly fire extinguisher checks are carried out and that any defects are reported immediately to the Compliance Department via EHS Officer.

It is the responsibility of the first aid checker to ensure all first aid kits are maintained.

It is the responsibility of the Compliance Department to ensure a first aid and fire extinguisher checker has been designated and that the blank weekly checklists are made available either in physical copy or through Edac.

All KMK Employees should make themselves aware of who the First Aiders are, of the locations of the first aid boxes and Heart saver AED. All employees are responsible for ensuring that if an ill/injured person is unable to get to a First Aider, that a First Aider is located and brought to the scene and must complete a written account of what they have witnessed or experienced with the Compliance Department as part of the *Work-Related Accident Report Form*. It is the responsibility of all KMK employees to co-operate and honestly relay information to the Compliance Department in the case of a work-related accident.

It is the responsibility of the First Aider to provide treatment and judgement on the injury and determine what steps are to be taken from there e.g., visiting A&E or the Kilbeggan Medical Centre. It is the responsibility of the First Aider to report the accident to the area Supervisor and/or EHS Officer. If the ill/injured person is seriously ill/injured, they shall be taken directly to A&E by the First Aider. This particularly applies when outside of company doctor working hours. A First Aider must remain with the ill/injured person at all times.

The safety Officer is responsible for ensuring that the steps outlined in this procedure are taken to ensure that a full, accurate and valid investigation is carried out and to ensure that all relevant information pertaining to the event is accurately documented.

The EHS Officer and Managing Directors are responsible for ensuring this procedure is carried out in full if the EHS Officer is absent or unavailable a member of Compliance is responsible for ensuring the roll call is complete effectively. It is the responsibility of the EHS Officer and site supervisors to accurately complete the roll call in the event of a fire.

Role	<u>Fire Warden</u>
Nominated Person(s)Office Hours 08:00 – 17:00	EHS Officer Alan O'Connor
Out of office hours 17:00 – 19:00	Robert Halpin / Frazer McNicol Stanislavs Kaminskis
List of Duties	
- Attend fire alarm panel to check area of fire. - Assess the area in which the fire is located. - Ensure the area is clear of people. - Extinguish fire ONLY if it is safe to do so. - Liaise with designated Co-ordinator.	

Role	<u>Roll Call</u>
Nominated Person(s)Office Hours 08:00 – 17:00	David Finane Thelma Mealiffe
Out of office hours 17:00 – 19:00	Robert Halpin – Frazer McNicol Aidas Tiknius
List of Duties	
- Record names of employees using the Tablet at reception - Access Timepoint on the tablet and commence the Roll Call - Record time & Date of roll call. - Record time taken to assemble. - Liaise with fire warden/Co-ordinator. - Detail any missing persons & notify co-ordinator of missing persons.	

Role	<u>Co-ordinator</u>
Nominated Person(s)Office Hours 08:00 – 17:00	Roddy McGowan / David Finane
Out of office hours 17:00 – 19:00	Stanislav Kaminskis / Robert Halpin / Frazer McNicol
List of Duties	
- Liaise between Fire warden & designated roll call person. - Assist the Fire Warden where required - Record time taking to assemble and good communication with roll call person. - Call fire brigade if deemed necessary. - Notify staff if fire department have been contacted. - Ensure a route or pathway is clear for the Fire Department	

5.0 REFERENCES

<i>201-PRO-IMS</i>	<i>Control of Documents Procedure</i>
<i>202-PRO-IMS</i>	<i>Control of Records Procedure</i>
<i>213-DOC-IMS</i>	<i>Safety Statement</i>
<i>216-PRO-IMS</i>	<i>Off-site Emergency Response Procedure</i>
<i>304-PRO-IMS</i>	<i>Medicals (Company Doctor) Procedure</i>
<i>307-DOC-IMS</i>	<i>Business Continuity Plan</i>
<i>311-PRO-IMS</i>	<i>Work-Related Accident Procedure</i>
<i>336-PRO-IMS</i>	<i>Return to Work Procedure</i>
<i>401-REC-IMS</i>	<i>Work-Related Accident Report Form</i>
<i>402-REC-IMS</i>	<i>Fire Log</i>
<i>406-REC-IMS</i>	<i>Occurrences Register</i>
<i>415d-REC-IMS</i>	<i>Visitor Site Safety Rules</i>
<i>425-REC-IMS</i>	<i>Emergency Response Drills</i>
<i>426-REC-IMS</i>	<i>Internal Audit Report Form</i>
<i>449-REC-IMS</i>	<i>Return to Work Assessment Form</i>
<i>449-REC-IMS</i>	<i>Return to Work Interview Form</i>
<i>506</i>	<i>Kilbeggan Medical Centre:</i>
	<i>Contact No.: 057 9332444</i>
	<i>Office Manager: Lorraine Prenderville</i>
	<i>Email: lorraine@kilbegganmedical.ie</i>

6.0 REVIEW AND AMENDMENT HISTORY

This document must be reviewed in accordance with the Control of Documents Procedure:

- at least once annually.
- more frequently if required in order to ensure adequacy.
- in event of a change of practice relating to the Emergency Response Procedure.

All changes made to this document must be recorded in the table below:

Paragraph(s)	Description(s)	Date	Signature	Version
All	Separation from Tullamore procedure. Original Release.	13/02/2020	M. Flanagan N. Nally	00
3.1.1 3.1.3	Reviewed Fire and Accident Emergency Response Procedures and updated to include response measures to be followed during COVID-19 Pandemic	09/07/2020	N. Nally	01
3.0, App 2	Amended section 3.1.2 major spill to include shut-off valve reference and actions. New emergency map included in appendix 2. Minor updates throughout 3.0 regarding COVID-19.	03/11/2020	N. Nally O. Brennan	02
All	Removal of references to social distancing/Covid in section 3.0, 3.1.1 & 3.1.3. Insertion of EHS Officer name in section 3.0 and other minor changes in 3.1.2 with reference to the site map and insertion of new location for the first aid kit and defibrillator in section 3.1.3. Change of Kilbeggan Medical Office Manager to Lorraine Prenderville.	20/06/2022	A. Flynn D. Finane	03
ALL	Full review, Changes to AED location, Addition of out of hours emergency procedure & out of Business Emergency procedure, added location of bin, Grammar review, spellcheck. Change from EHS specialist to EHS officer,	04/05/2023	J. Corbally E. Pidgeon	04
Appendices	Added the waste materials storage plan map to the appendices, there are now 3 appendices , there was 2.	18/09/2023	D. Finane	05
All	Removed former operator, Dion Guinan from the Roll Caller list, and former EHS Officer, John Corbally from the Coordinator list under section 4.0. Responsibilities. Added current EHS officer, Roddy McGowan to coordinator list. Made some minor grammatical changes throughout document.	01/11/2023	M. Martino	06
ALL	Removed former supervisor Vytautas Blekys and Add supervisors Robert Halpin & Frazer McNicol under 4.0 Responsibilities – Roles – Out of Office Hours. Add in Appendix 2 – (Fire Zone – Alarm Panel) to include Fire Zones in Kilbeggan	28/06/2024	R McGowan	07

All	Minor updates – Update to 3.1.5 Accident Response; Section 4.0 Responsibilities Update Appendix 3 – Waste Materials Storage Plan Map	30/07/2024	R McGowan	08
Section 3.1.4	Minor sentence addition, “There is also a chemicals cabinet onsite where liquids can be temporarily stored”. Also, changed the reference from Appendix 2 to Appendix 4 for emergency schematic layout. Changed the reference from Building A2 to building A for accuracy.	06/11/2024	D.Finane	09
Appendices	Add in Appendix 4 – Emergency Exit Routes (Buildings A&B) Changed Appendix 4 to Appendix 5 – Emergency Schematic Layout of KMK Kilbeggan	10/12/2024	R. McGowan	10

APPENDIX 1: EMERGENCY CONTACT PHONE NUMBERS

Dial 9 first for an outside line, then;

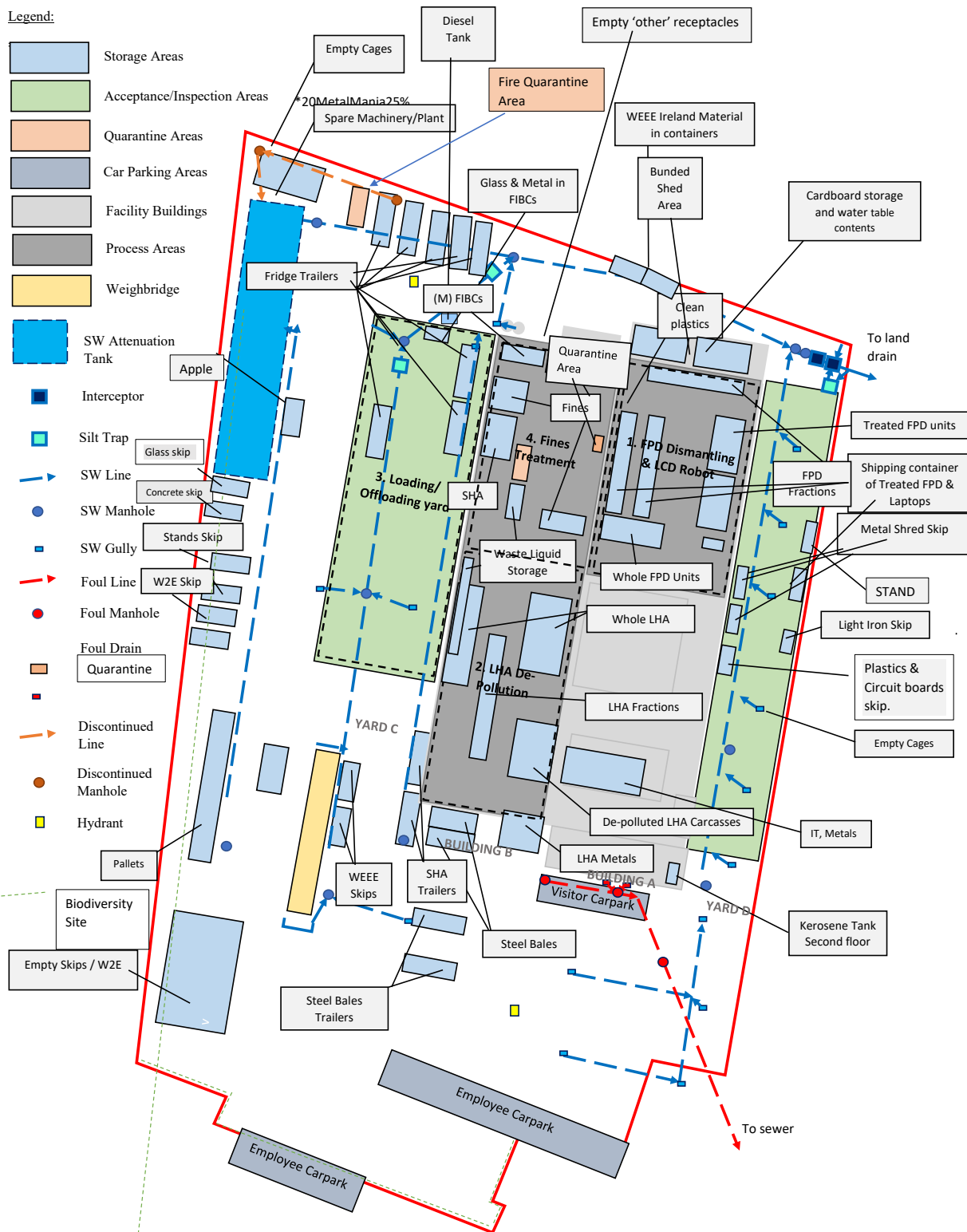
Emergency Services (Fire, Ambulance, Gardaí)	–	112 or 999
Max Kyck	–	086 806 6888
Gardaí Kilbeggan	–	057 933 2102
Gardaí Tullamore	–	057 932 7600
GGL	–	0818 319 077
Security (Siobhan, Midland Security)	–	091 384 922
Tullamore Hospital	–	057 932 1501
ESB	–	1850 372 999
Bord Gáis	–	1850 205 050
Irish Water	–	1850 278 278
Kilbeggan Medical Centre (Company Doctor)	–	057 933 2444
MIDOC (GP Out of Hours)	–	1850 302 702
KMK Office Tullamore	–	057 934 1634
KMK Office Kilbeggan	–	057 933 3030
EPA (HQ, Wexford)	–	053 916 0600
Westmeath County Council Headquarters	–	044 933 2000
Fire Services	–	044 934 1794
HSA	-	(01) 6147000

APPENDIX 2: FIRE ZONE – ALARM PANEL

Fire Zone - Alarm Panel	
Zone	
1	Office (downstairs)
2	Office (upstairs)
3	Warehouse 1 (sims area)
4	Steel shed (sims area)
5	Cabin (sims area)
6	Warehouse 2 (LHA)
7	Beam 1 (front door to sims)
8	Beam 2 (sims to fpd)
9	Sounder bells
10	Beam 3 (LHA to fines)
11	Back shed

APPENDIX 3: WASTE MATERIALS STORAGE PLAN

APPENDIX 1. WASTE STORAGE PLAN (DRAINAGE SUPERIMPOSED)

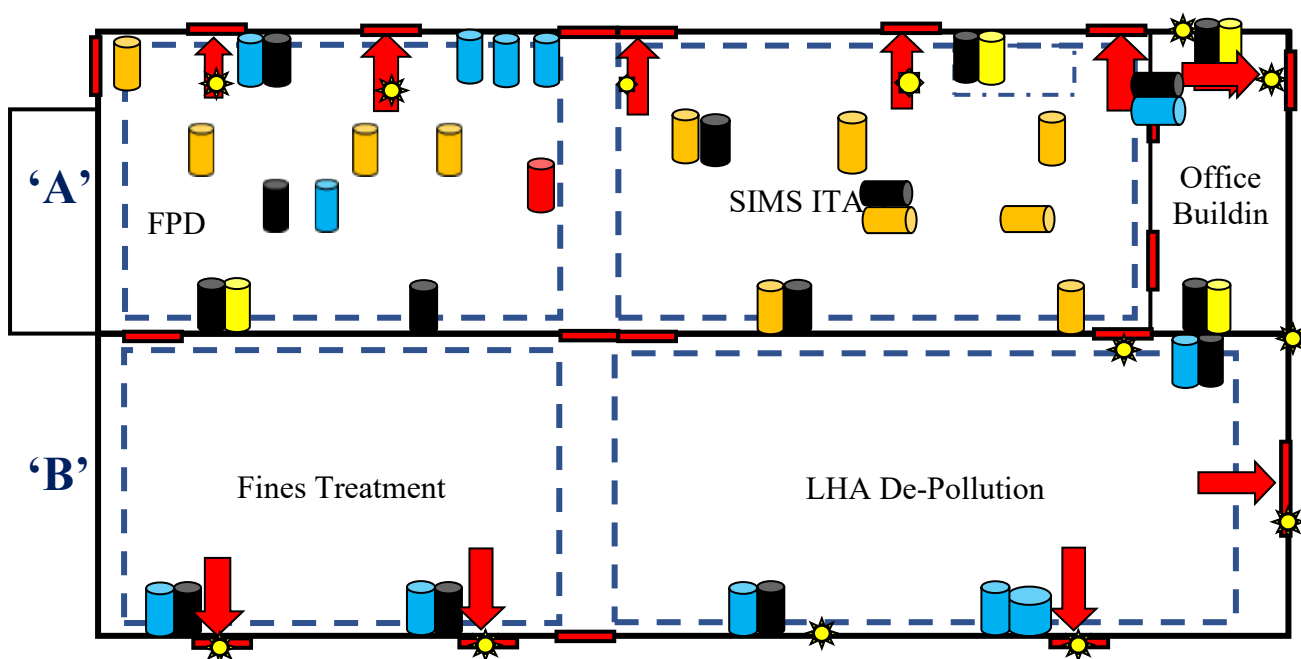
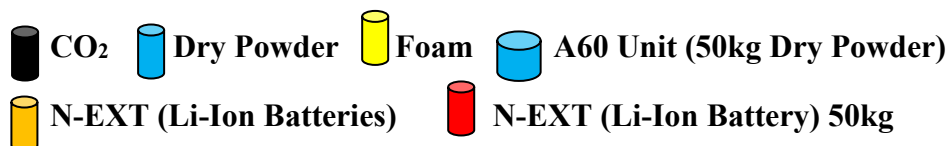


APPENDIX 4: EMERGENCY EXIT ROUTES (BUILDINGS A & B)

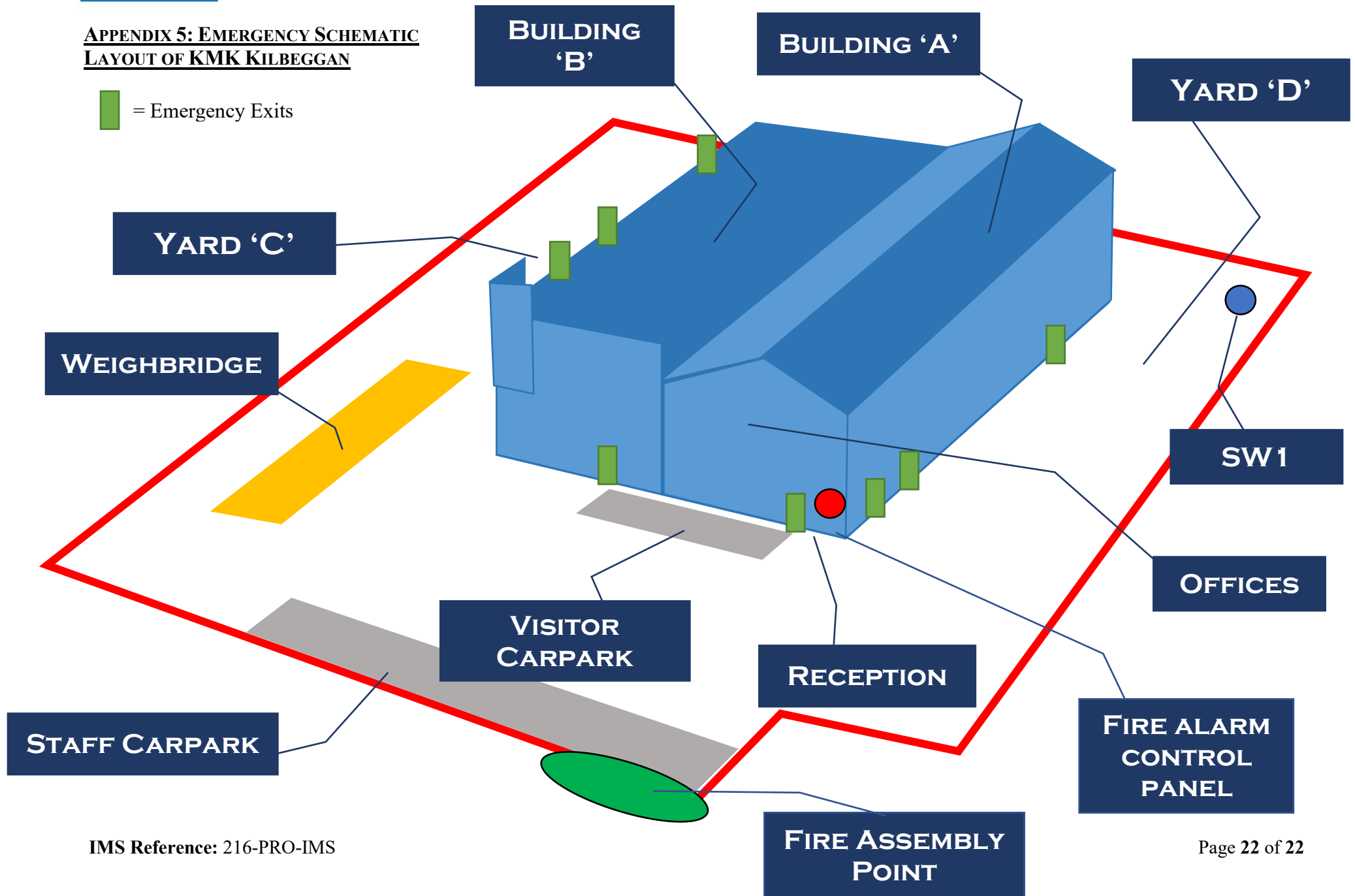
Map of emergency exits (red arrows) & fire extinguisher locations.

☀ Emergency Lighting

Fire Extinguishers:



**APPENDIX 5: EMERGENCY SCHEMATIC
LAYOUT OF KMK KILBEGGAN**





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