



# Annual Environmental Report (AER) 2020

Company Name: KMK Metals Recycling Ltd.

Licence Number: P1076-01

Address: Moate Road, Meeniska, Kilbeggan, Co.

Westmeath, N91 PT78

Class of Activity<sup>1</sup>: 11

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<sup>1</sup> See Appendix I

# Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities<sup>2</sup> of large scale industrial (e.g. chemical, food processors, power plants) and waste facilities. Submitting an Annual Environmental Report (AER) is a requirement of all EPA licences.

An AER is a public document. To this end, this format has been developed for industrial and waste licence holders (other than the intensive agriculture sector) to use as a template. This is to assist any member of the public to interpret and understand the environmental performance of the licensed facility.

The AER is a **summary** of environmental information for a given year. It includes:

- Details of the licence holder's environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility's activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

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<sup>2</sup> See Appendix I

- 2) Some documents<sup>3</sup> are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

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<sup>3</sup> This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

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## Glossary

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Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
CRAMP	Closure, Restoration and Aftercare Management Plan.
ELRA	Environmental Liability Risk Assessment.
Emission Limit Value	Limits set for specified emissions, typically outlined in Schedule B of an EPA licence.
EMS	Environmental Management System.
Environmental Goal	An objective or target set by a licensee as part of an environmental management system (EMS).
Environmental Pollutant	Substance or material that due to its quantity and/or nature has a negative impact on the environment.
Facility	Any site or premises that holds an EPA industrial or waste licence.
FP	Financial Provision.
GJ	Giga joules, an international unit of energy measurement.
Groundwater	All water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.
Incident	As defined by an EPA industrial or waste licence.

Inert Waste	Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health.
List of Wastes (LoW)	A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU.
Noise Sensitive Location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Non-Renewable Resource	A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas.
Oil Separator	Separator system for light liquids (e.g. oil and petrol).
PRTR	Pollutant Release and Transfer Register.
Renewable Resource	Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.
Sanitary Waste	Waste water from toilet, washroom and canteen facilities.
Storm Water	Rain water run-off from roof and non-process areas.

Surface Water	Lakes, rivers, streams, estuaries and coastal waters.
Trigger Level	A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder.
Volatile Organic Compounds	Gases produced from solids or liquids that evaporate readily in ambient conditions.
Waste	Any substance or object which the holder discards or intends or is required to discard.
WEEE	Waste Electrical and Electronic Equipment

#### Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

## Declaration

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I, Olivia Brennan (Compliance Manager), confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

**Tick here**





## 1) Introduction

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See below a brief description of our facility and a summary of our environmental performance this year.

KMK's Kilbeggan facility has been in operation since 2017. The facility is approx. 31,200 m<sup>2</sup> in size and all areas of the site are in active use. The hours of waste acceptance and operation are Monday to Friday 06:00 to 22:00, Saturdays 06:00 to 14:00, while the facility is closed on Sundays / public holidays. There are currently an average of 20 full-time employees working at the facility. The facility is authorised to accept hazardous and non-hazardous waste, including metals, waste electrical and electronic equipment (WEEE) and batteries. The licensed operations at the facility include the bulking and temporary storage of fridges and freezers, dismantling and recycling of flat screens, dismantling and recycling of large household appliances and refinement of WEEE plastics. The facility is certified to ISO 9001, ISO 14001, ISO 45001 and the WEEELABEX/EN 50625 series standards. The facility is licensed with a capacity to accept 50,000 tonnes per annum; in 2020, only 2,829.5 tonnes were received in the time the licence was granted between the 12<sup>th</sup> November and the 31<sup>st</sup> December 2020.

Environmental Performance Summary:

- No environmental incidents.
- No open compliance investigations with the EPA.
- No complaints.
- No non-compliances.
- No major changes or amendments to the IE licence in 2020.
- There has been an increase in electricity use at the facility compared to previous years due to operational expansion.
- There were no infrastructural or improvement works in the time that the facility became IE licensed.

## Contact Us

If you have any questions or would like further information on any aspect of this report, please contact us directly.

See below details:

Telephone: 057 93 33030

E-mail: [info@kmk.ie](mailto:info@kmk.ie)

Website: <https://www.kmk.ie/>

Please note, further compliance information can be obtained from the 'Compliance' section of the website. The 'Audit Us' sub-section contained therein provides free to download compliance documentation which is commonly requested during either desktop or on-site audits/inspections:

<https://www.kmk.ie/documents/>

KMK also maintain a communications programme in the form of a physical environmental file at the facility, ensuring members of the public can obtain information on-site concerning the environmental performance of the facility.

## 2) How we Manage our Facility

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### **Explanation**

To ensure our facility's activities do not cause environmental pollution we are required to have detailed documentation systems in place to help us manage and track our environmental performance. These systems are referred to as Environmental Management Systems (EMS). We review our EMS every year and set up-to-date **environmental goals** to continually improve our environmental performance.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

**Table 1 Environmental Goals**

<b>Environmental Goal</b>	<b>Target Date</b>	<b>Progress</b>
The improvement of waste segregation and bin usage in offices/canteens.	Q4 2020	Complete
Implementation of an Energy Management Plan and Energy Awareness Campaign.	Q4 2020	Delayed
To improve site housekeeping methods and controls on litter, debris, dusts, etc.	Q4 2020	Complete
To ensure that all information/data required for the AER in 2021 is recorded and available for reporting purposes. This is to be	Q3 2020	Complete

based on the template made available by the EPA.		
To establish acceptable trigger levels for surface water parameters at KMK Kilbeggan.	Q4 2020	Delayed
To put in place information and documentation to clearly show how waste is to be managed on-site at KMK Kilbeggan.	Q3 2020	Delayed
To implement infrastructural improvements to protect surface water and groundwater quality at KMK Kilbeggan.	Q4 2020	Complete

#### Comment

Four environmental goals set in 2020 were successfully completed despite the impact of the COVID-19 pandemic. The three environmental goals marked as 'Delayed' will be carried over into the environmental goals for 2021 and set new target dates for completion that year.

### 3) Energy & Water

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#### Energy

##### **Explanation**

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

**Table 2 Energy Used**

<b>Energy Used</b>	<b>Quantity (GJ)</b>	<b>% Increase/ decrease on previous year</b>
Electricity	387.5	13% Increase
Kerosene	215.7	40% Increase
Green Diesel	1408.3	22% Increase
Natural Gas	0	N/A
Coal / Solid Fuel	0	N/A
Peat	0	N/A
Renewable Biomass	0	N/A
Renewable Energy Generated On-site	0	N/A
<b>Total Energy Used</b>	<b>2,011.5</b>	

##### Comment

The Kilbeggan facility is currently in a period of expansion and has increased its maximum waste intake capacity from 20,000T to 50,000T per annum this year. As such, energy use at the facility is increasing as we implement new processes and machinery. An independent energy management audit is

scheduled to take place in 2021 which will support KMK Metals Recycling in managing its energy use and implementing new measures to reduce energy usage and potentially generate renewable energy where possible.

The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

**Table 3      Energy Generated**

<b>Energy Generated (GJ)</b>	<b>Quantity</b>	<b>% Increase/ decrease on previous year</b>
Renewable Energy	N/A	N/A
<b>Total Energy Generated</b>	N/A	N/A

Comment

Energy is not generated on-site currently.

## Water

### Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

**Table 4 Water Used**

Source of Water Used	Quantity (m <sup>3</sup> /year)	% Increase/ decrease on previous year
Groundwater	0	N/A
Surface Water	0	N/A
Public Supply	86	N/A
Recycled Water	0	N/A
Rainwater	115	N/A
<b>Total Water Used</b>	201	

### Comment

\*Estimated figures

The facility is connected to the Public Water Supply. A rainwater harvester is installed on-site and used to suppress any dust generated on-site and supplies the road sweeper. This is the first year to quantify the water usage in this way (period Nov to Dec 2020 only for 2020) so the % increase/decrease on the previous year will not be available until next year's AER.



## 4) Environmental Complaints

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### **Explanation**

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us<sup>4</sup> directly. You can also contact the EPA<sup>5</sup> if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

**Table 5 Summary of All Environmental Complaints Received in**

<b>Type of Complaint</b>	<b>Number of Complaints Received</b>	<b>Number Closed</b>
<b>Odour / Smells</b>	0	N/A
<b>Noise</b>	0	N/A
<b>Dust</b>	0	N/A
<b>Water Quality</b>	0	N/A
<b>Air Quality</b>	0	N/A
<b>Waste</b>	0	N/A
<b>Litter</b>	0	N/A
<b>Vermin/Flies/Birds</b>	0	N/A
<b>Soil Contamination</b>	0	N/A
<b>Vibration</b>	0	N/A
<b>Other</b>	0	N/A

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<sup>4</sup> See Section 1, Introduction – Contact Us

<sup>5</sup> If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

## Comment

No environmental complaints were made directly to us or the EPA in 2020. The Kilbeggan facility has a good track record regarding its impact on the surrounding environment and nuisance potential for its neighbours. The site is well maintained, clean and tidy with little noise, dust or odour.

## 5) Environmental Incidents

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### **Explanation**

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.

**Table 6      Number of Environmental Incidents**

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Abatement Equipment Offline	0	0	0	0	0
Breach of Ambient ELV	0	0	0	0	0
Breach of Emission Limit	0	0	0	0	0
Explosion	0	0	0	0	0
Fire	0	0	0	0	0
Monitoring Equipment Failure	0	0	0	0	0
Odour	0	0	0	0	0
Spillage	0	0	0	0	0
Breach of trigger Level	0	0	0	0	0

<b>Incident Category</b>	<b>Minor</b>	<b>Limited</b>	<b>Serious</b>	<b>Very Serious</b>	<b>Catastrophic</b>
Uncontrolled Release	0	0	0	0	0
Other	0	0	0	0	0

Comment

No environmental incidents were reported in 2020.

## 6) Our Environmental Emissions

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### **Explanation**

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Waste water
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA<sup>6</sup>.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

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<sup>6</sup> See section 5, Incidents

## Storm Water

### **Explanation**

Storm water is rain water run-off from roof and non-process areas of a facility, e.g. car parks, and generally shall not contain any pollution. Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

### **1. Storm water from our facility is managed prior to release by;**

Storm water from our facility is managed prior to release by silt traps and a Class 1 oil interceptor.

### **2. Storm water from our facility is released into the following water bodies:**

Storm water from our facility is released into the following water bodies:  
River Brosna

**Table 7 Summary of Storm Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant<sup>7</sup></b>	<b>Comment</b>
pH	2	N/A	No ELV or trigger level applicable
Chemical Oxygen Demand	2	N/A	No ELV or trigger level applicable
Total Organic Carbon	2	N/A	No ELV or trigger level applicable
Total Suspended Solids	2	N/A	No ELV or trigger level applicable
Hydrocarbon oil index	2	N/A	No ELV or trigger level applicable
Arsenic	2	N/A	No ELV or trigger level applicable
Cadmium	2	N/A	No ELV or trigger level applicable
Chromium	2	N/A	No ELV or trigger level applicable
Copper	2	N/A	No ELV or trigger level applicable

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<sup>7</sup> % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.



Lead	2	N/A	No ELV or trigger level applicable
Nickel	2	N/A	No ELV or trigger level applicable
Mercury	2	N/A	No ELV or trigger level applicable
Zinc	2	N/A	No ELV or trigger level applicable

#### Comment

There are no ELVs listed within the licence for the above parameters. The facility is currently sampling monitoring point 'SW1' on a monthly basis to build up enough representative samples to calculate appropriate trigger levels for the above parameters.

## Waste Water

### Explanation

There are two types of waste water that can be produced:

- Process waste water produced from the activities and;
- Sanitary waste water from toilets, washrooms and canteens.

Our EPA licence requires us to manage our waste water on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the waste water produced from our activities, where it is released and the results of monitoring this year.

### **1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody;**

Waste water (foul type only and non-process related) produced by our activities is treated by Irish Water (Kilbeggan plant - Reg. No. D0103-01) before discharge to a receiving waterbody.

### **2. Treated waste water from our facility is released into the following water bodies:**

Treated waste water from our facility (non process type and via Irish Water) is released into the following water bodies:

River Brosna

**Table 8 Summary of Waste Water Monitoring**

<b>Parameter measured</b>	<b>No. of Samples</b>	<b>% Compliant</b>	<b>Comment</b>
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

Comment

The waste water sent to Irish Water is treated in accordance with the conditions of their Waste Water Discharge Authorisation (Reg. No. D0103-01).

## Air

### Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

### 1. We monitor air emissions from the following number of emission points at our facility.

2 (Ref. A-1 and A-3)

**Table 9 Summary of Air Emissions Monitoring**

Parameter measured	No. of Samples	% Compliant	Comment
Total Particulates	1	100	N/A
Volumetric Flow Rate	1	100	N/A
Mercury	1	100	N/A

### Comment

Quarterly monitoring is undertaken by an independent and accredited stack emissions testing company to verify continuous measurements and also to take measurements of the non-continuous emission parameters. It was noted from the EPA OEE that an additional sampling port is required for stack A-1 and also that flow rates for stack A-3 need to be increased to a level for compliant monitoring for 2021.

**Table 10 Summary of Odour Assessments Carried Out**

<b>Assessment Conducted By</b>	<b>No. of Odour Assessments</b>	<b>% Compliant<sup>8</sup></b>	<b>Comment</b>
Licence Holder	N/A	N/A	N/A
EPA	N/A	N/A	N/A

Comment

The waste profile of metals, WEEE and batteries are not known to generate odours. Due to this fact, odour monitoring is not required at the facility.

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<sup>8</sup> A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at <http://www.epa.ie/pubs/advice/air/emissions/ag5-odourassessment.html>

## Fugitive Solvent Emissions

Are you are required to monitor fugitive solvent air emissions from your facility?

Yes

No

### Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations<sup>9</sup>. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

**Table 11 Summary of Fugitive Solvent Emissions**

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant
N/A	N/A	N/A

Comment

N/A

<sup>9</sup> See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

## Groundwater

### Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

**1. Do you have a groundwater monitoring programme in place?**

Yes

No

**2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?**

Yes

No

**Table 12 List of Groundwater Pollutants Identified**

Pollutants
N/A

**3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.**

N/A

Comment

N/A



## Noise

### Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

#### 1. We conducted noise monitoring on the following dates this year:

Noise monitoring did not take place between the time that the licence was granted in November and the end of 2020. Noise monitoring will take place as per the new licence conditions in 2021.

#### 2. Was the noise monitoring carried out at:

- i. the boundary of our facility,
- ii. noise sensitive locations off-site, or
- iii. both?

N/A

#### 3. Were measured noise levels compliant with your EPA licence limits?

Yes

No

If No, we took the following actions to address the noise level exceedances?

N/A

Comment

N/A

## 7) Waste

### Waste Generated

#### Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in table 13 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

**Table 13 Waste Generated**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	4.806	N/A	100
Non-Hazardous	0.2	N/A	100
Inert	0	N/A	-
<b>Total Tonnes</b>	<b>5.006</b>		

#### Comment

The hazardous waste reported was sent for either high temperature incineration or wastewater treatment, depending on the material. This is the first year to quantify the waste generated in this way so the % increase/decrease on the previous year will not be available until next year's AER. This waste data only represents what was collected in the licenced period of 12/11/2020 - 31/12/2020.

## Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes

No

### Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 14 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

**Table 14 Waste Accepted**

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	871.703	N/A	95.98
Non-Hazardous	1957.816	N/A	90.14
Inert	0	N/A	-
<b>Total Tonnes</b>	<b>2829.519</b>		

### Comment

Hazardous and non-hazardous waste was treated to a high % recovery rate in 2020. This waste data only represents what was collected in the licenced period of 12/11/2020 - 31/12/2020.

## 8) Financial Provision

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### **Explanation**

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high risk facility<sup>10</sup> by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes

No

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

Given that the licence was only granted in November 2020, KMK were provided a specific time period to prepare and agree this CRAMP Plan with the EPA in 2021. This will be reported in the AER for 2021 next year.

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

N/A

4. Has there been any significant changes on your site since the last agreements?

Yes

No

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<sup>10</sup> See Appendix II

If yes, have you submitted details to the EPA?

Yes

No

N/A

# Appendix I

## Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

Class 1	Minerals and other materials
Class 2	Energy
Class 3	Metals
Class 4	Mineral fibres and glass
Class 5	Chemicals
Class 6	Intensive Agriculture <sup>11</sup>
Class 7	Food and drink
Class 8	Wood, paper, textiles and leather
Class 9	Fossil fuels
Class 10	Cement, lime and magnesium oxide
Class 11	Waste
Class 12	Surface Coatings
Class 13	Other Activities

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<sup>11</sup> This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at <http://www.epa.ie/pubs/advice/aerprtr/aerguid/>

# Appendix II

## High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

### NOTE:

This list is subject to change.

See the link below for further information.

<http://www.epa.ie/pubs/advice/licensee/fp/epaapproachtoenvironmentalliabilitiesandfinancialprovision.html>