



Annual Environmental Report (AER) 2022

Company Name: KMK Metals Recycling Ltd.

Licence Number: P1076-01

Address: Moate Road, Meeniska, Kilbeggan, Co.

Westmeath, N91 PT78

Class of Activity¹: 11

Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities¹ 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.

¹ See Appendix I

- 2) Some documents² 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.

² This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

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Glossary

Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
Beyond Compliance	Beyond compliance is concept to help deliver greater organisational performance and long-term value for the environment, society and the economy.
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	Wastewater from toilet, washroom and canteen facilities.

Storm Water	Rainwater 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.

Disclaimer

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

Declaration

I, David Finane (Environmental Quality Officer), 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

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 m² 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 38 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 2022, 20,790.677 tonnes were received.

Environmental Performance Summary:

- No environmental incidents
- No open compliance investigations with the EPA.
- No complaints.
- Two non-compliances, (Inadequate railing at Air Emission Reference No. A-1: & Unlabelled IBC's containing hazardous wash water).
- No major changes or amendments to the IE licence in 2022.
- Electricity use has decreased at the facility compared to 2021 due to the new Pv panels now in operation.
- Infrastructural works; KMK installed a new access platform for Air Emissions Reference No. A-1 to comply with recommendations from an EPA audit (non-compliance number NC024658 on Eden). In response to an observation made in Inspection report No. SV22828, works were also carried out on Building A3 to make the quarantine area larger so as to contain a spill

meaning that mobile bunds are no longer required in this area. Floors were further sealed in Area B3 (fines area) using an epoxy resin.

Contact Us

If you have any questions or would like further information on any aspect of our licensed activity, please contact us directly.

See below details:

Telephone: 057 93 33030.

E-mail: 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

Environmental Management System

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

Environmental Goal	Target Date	Progress
Install photovoltaic (PV) Panel system in KMK Kilbeggan for electricity generation on site.	Q2 2022	Complete
Compare monthly KWh produced by PV panels with company usage from the national grid to determine if expansion of the panels is a viable option.	Q4 2022	Complete
Biodiversity Project – Join the All-Ireland Pollinator Plan 2021-2025 for businesses and meet criteria set by the Biodiversity Data Centre including set targets for each year.	Q4 2022	Year 1 - Complete

Establishment of acceptable ELV's for SW1 at KMK Kilbeggan	Q4 2022	Delayed
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Add rows as necessary

Comment

Four environmental goals were set in 2022, three were successfully completed and one which was marked 'Delayed' will be carried over into the environmental goals for 2023 and a new set target date will be allocated to that task to be completed.

Beyond Compliance

Explanation

We are legally required to comply with our environmental licence. However, the EPA realise that some sites go further than just complying with their environmental licence requirements. Some projects carried out at facilities can have long term positive impacts on the environment and local communities.

The EPA's beyond compliance initiative is encouraging us to identify and report on these environmental and sustainability projects. For example, the project could involve renewable energy, biodiversity, water conservation or exemplar community engagement.

Did any project completed on your site in the reporting year go beyond your licence requirements?

Yes

No

If yes, provide details of one case study in Appendix III that demonstrates how the project went beyond compliance of your licence.

In 2022, KMK applied for the All-Ireland Pollinator Plan and was granted approval as part of this plan. The plan involved developing a woodland and creating a habitat for Bee's and wildlife. As part of this an annual AER is submitted to the National Biodiversity Centre. This AER contains all the information KMK worked on for 2022 and how the habitat or area was developed. Annual targets must be met as part of this pollinator plan. KMK excelled in this and achieved all objectives and did more than was required.

The area can now be accessed by staff and auditors where a picnic area was also developed for staff and visitors to enjoy some peace and quiet if they so wish. KMK aim to develop this habitat over the coming years and protect wildlife and species.

3) Energy & Water

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 3 Energy Used

Energy Used (kWH)	Quantity (kWH)	% Increase/ decrease on previous year
Electricity	100,320.00	19.17% Decrease
Kerosene	40,570.55	14.43% Decrease
Green Diesel	456,323.71	23.56% 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	40,645	N/A
Total Energy Used	556569.26	2.91% Increase

Comment

The Kilbeggan facility is growing, processes are evolving year on year however with the addition of the new PV system, KMK energy use has decreased by 19.17% as mentioned in Table 3. Employee numbers on site have increased from 25 to 38 employees in 2022. KMK have installed a 60.8

KWh photovoltaic solar panel array, consisting of 160 solar panels, with an expected power generation of 52,484 kWh in year one. Kerosene also decreased in 2022 while green diesel increased. An increase in diesel use is likely from increased production and KMK purchased an additional forklift to the fleet.

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

Table 4 Energy Generated

Energy Generated	Quantity (kWH)	% Increase/ decrease on previous year
Renewable Energy	40.645	100
Total Energy Generated	40.645	100

Comment

KMK generated 40.645kWH of energy in 2022 with the addition of solar panels in Q2 2022. All of this energy was consumed on site for processes.

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 5 Water Used

Source of Water Used	Quantity (m³/year)	% Increase/decrease on previous year
Groundwater	0	N\A
Surface Water	0	
Public Supply	429 average	N\A
Recycled Water	0	
Rainwater	494	-62.30%
Total Water Used	923	

Comment

*Estimated Figures

KMK Kilbeggan do not use onsite groundwater, the public supply has only been documented since August 2022, an average for the year was given based on an average taken from the recorded data. Rainwater is harvested on site from the roof and used for dust dampening and cleaning of the site.

4) Environmental Complaints

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 us³ directly. You can also contact the EPA⁴ 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 6 Summary of All Environmental Complaints Received in

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

³ See Section 1, Introduction – Contact Us

⁴ 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 KMK Metals Recycling Limited or to the EPA in 2022. 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, with good general housekeeping practices in place, noise levels are well within limit values, a schedule is in place for dust dampening which is carried out up to three times daily.

5) Environmental Incidents

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 7 Number of Environmental Incidents

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
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	1	0	0	0	0
Breach of trigger Level	0	0	0	0	0

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
Uncontrolled Release	0	0	0	0	0
Other	0	0	0	0	0

Comment

KMK Kilbeggan had no Environmental incidents in 2022. One minor spill occurred when a hydraulic hose burst on a forklift. However, this did not have access to any drains on site and was cleaned up immediately.

6) Our Environmental Emissions

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
- Wastewater
- 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 EPA⁵.

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.

⁵ See section 5, Incidents

Storm Water

Explanation

Storm water is rainwater run-off from roof and non-process areas of a facility, e.g., carparks, 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 currently tankered off-site by a competent waste contractor to an approved treatment plant.

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

Storm water is not currently released from the facility. Water is tankered off site to a treatment plant in Tullamore Co. Offaly. More information can be found in the EPR return on Eden.

Table 8 Summary of Storm Water Monitoring

Parameter measured	No. of Samples	% Compliant⁶	Comment
Ph	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Chemical Oxygen Demand	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Total Organic Carbon	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Total Suspended Solids	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Hydrocarbon oil index	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Arsenic	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Cadmium	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.

⁶ % 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.

Chromium	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Copper	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Lead	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Nickel	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Mercury	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.
Zinc	4	100	22/03/2022 – Q1. 17/05/2022 – Q2. 03/08/2022 – Q3. 01/11/2022 – Q4.

Add rows as necessary

Comment

SW1 has been closed at KMK Kilbeggan since Q4 of 2021, all surface/storm water has been tankered off-site by an approved haulier. Testing continued to be carried out for each quarter during the 2022 period by KMK in house and sent to an approved laboratory for analysis. The results have met the requirements for each quarter. The EPA also visited the site and gathered samples in Q4. These also passed for all parameters.

Explanation

There are two types of wastewater that can be produced:

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

Our EPA licence requires us to manage our wastewater 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 wastewater produced from our activities, where it is released and the results of monitoring this year.

1. Wastewater produced by our activities is treated as follows before discharge to a receiving waterbody;

Wastewater (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 wastewater from our facility is released into the following water bodies:

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

Table 9 Summary of Wastewater Monitoring

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

Add rows as necessary

Comment

The wastewater sent to Irish Water is treated in accordance with the conditions of their Wastewater 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 10 Summary of Air Emissions Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
Total Particulates	4	100	N/A
Volumetric Flow Rate	4	100	N/A
Mercury	4	100	N/A

Add rows as necessary

Comment

Quarterly monitoring is undertaken by an independent and accredited stack emissions testing company to verify continuous measurements and to take measurements of the non-continuous emission parameters. Both stacks are fully compliant, as upgrades were made in 2022 to include adequate railing

at Air Emission Reference No. A-1 which was recommended by the EPA through the EDEN system (non – compliance ref no. NC024658).

Table 11 Summary of Odour Assessments Carried Out

Assessment Conducted By	No. of Odour Assessments	% Compliant⁷	Comment
Licence Holder	N/A	N/A	N/A
EPA	N/A	N/A	N/A

Add rows where necessary

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.

⁷ A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at [Air Enforcement | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/enforcement/)

Fugitive Solvent Emissions

Are you 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) Regulations⁸. 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 12 Summary of Fugitive Solvent Emissions

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

Comment

N/A

⁸ 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 13 List of Groundwater Pollutants Identified

Pollutants
N/A

Add rows as necessary

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

N/A

Comment

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 is conducted annually. Noise monitoring for 2022 was complete on July 27th.

2. Where was the noise monitoring carried out?

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

ii. Noise sensitive locations

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 14 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 14 Waste Generated

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	10.72	-66.22%	100%
Non-Hazardous	1,623.91	721.65%	100%
Inert	0		
Total Tonnes	1,634.63	612.62%	

Comment

The EPR on Eden details the material generated on site. Material generated consists of rubble from construction and other waste generated from the site. A large change in waste generated due to the closure of SW1.

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 15 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 15 Waste Accepted

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	7,159.049	2.12%	98.50%
Non-Hazardous	13,631.628	-1.81%	93.56%
Inert	0		
Total Tonnes	20,790.677	-0.49%	

Comment

KMK received 0.49% less material in 2022 compared to 2021.

8) Financial Provision

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 facility⁹ 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?

December 2022

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

May 2021

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

Yes

No

If yes, have you submitted details to the EPA?

Yes

No

N/A

⁹ See Appendix II

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 ¹⁰
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

¹⁰ This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at [Compliance & Enforcement: Licensees: Reporting Publications | Environmental Protection Agency \(epa.ie\)](#)

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.

[Compliance & Enforcement: Financial Provisions Publications | Environmental Protection Agency \(epa.ie\)](#)

Appendix III

Beyond Compliance

The case study below shows how we went beyond the requirements of our licence in the reporting year.

In May 2022, KMK Metal Recycling Limited joined the All-Ireland Pollinator Plan for 2021-2025. KMK achieved a certificate of participation from the NBDC for joining the plan. KMK is listed as one of the companies that supports the scheme along with the use of our logo on the partners page of the website <https://pollinators.ie/businesses/list-of-business-supporters/>, on their blog and as part of the NBDC's annual report, KMK has been given permission to use logos associated with the plan, such as the Pollinator's Plan Business Support Logo for use in our reports. North and South of Ireland depend on pollinators for the service that they provide, our pollinators are declining at a rapid rate. One third of our 99 different types of bees are threatened with extinction. The All-Ireland Pollinator Plan is a strategy that addresses this problem. It is a shared plan of action supported by more than 100 governmental and non-governmental organisations. By helping our pollinators, we are improving biodiversity across Ireland.

KMK have developed plans under the guidance of the Biodiversity Centre to take actions for the protection and enhancement of the biodiversity at our site in Kilbeggan. This includes a commitment to carrying out at least two measures each year, in 2022 KMK commissioned a Landscape Architect to map the biodiversity potential of the area at our facility in Kilbeggan, a final map was produced, both flora and fauna were identified, the site was divided into three distinct sections and actions were taken in one of the areas as part of our year one commitments. This included developing a pathway through our wooded area, putting in a recycled bench seat for employees, putting up a bird feeder, blackbird nesting box, lace wig house and developing the edges of the woodland creating a pathway made from felled branches which act as bug hotels throughout the entire length of the pathway. KMK also planted bulbs in the autumn of 2022 which included daffodils, bluebells, and honeysuckle.