

**PEST COUNTY  
GOVERNMENT OFFICE  
DISTRICT OFFICE IN ERD**

File number: PE-06/KTF/12654-12/2018  
Official in-charge: Petra Nemethne Magyar  
Dr. Zsolia Kovari

Subject: Kulso Raktar Krt. 11., Kistarcsa  
(topographical lot number no.: 5401); waste  
management licence issued to the ELTEX Ltd. for  
hazardous and non-hazardous waste collection at  
the business site, trading, pre-processing and  
utilisation

Renata Steh  
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Zsombor Berenyi  
Bernadett Bezak

Reference no.: -  
Attachment: -

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**DECISION**

**on granting the licence to the ELTEX Trading and Hauling Ltd.** (registered seat: Pechy M. Str. 46., 4032 Debrecen, business site: Kulso Raktar Krt. 11., Kistarcsa (topographical lot number: 5401); Environmental Customer Identification number: 100 393 875; Environmental Regional Identification number: 101 903 449; Central Statistical Code: 11148177-4690-113-09; hereinafter referred to as the: Licence Holder)

for

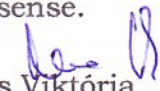
**the non-hazardous waste collection at the business site and trading with the waste** pursuant to Section 1.1 as well as the **pre-processing of non-hazardous waste at site** in accordance with Section 1.2 herein, the **recovery or reuse of non-hazardous waste at site** as set forth in Section 1.3, the **hazardous waste collection and trading at site** specified in Section 1.4, **pre-processing of the hazardous waste** listed in Section 1.5 and the **reuse of hazardous waste at site** as specified in Section 1.6 of this Decision

**concurrently abrogating the Waste Management Licences No.: PE-06/KTF/23390-12/2017 and PE-06/KTF/28610-13/2017** issued by the Pest County Government Office, General Department of Environmental Protection and Nature Conservation, District Office in Erd (hereinafter referred to as the District Office)

and stipulating the following conditions:

I, the undersigned Mátis Viktória, office manager of Translation Company Fordítópartner Bt. hereby certify that the English translation prepared fully conforms to the attached document in its contents and sense.

Győr, 31.07.2018

  
Mátis Viktória  
Office manager

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**FORDÍTÓPARTNER BT.**  
9025 Győr, Új sor 21.  
Adószám: 21986903-2-08

**1.1./ Non-hazardous waste allowed to be collected at the business site and involved in trading**

<b>Identification code</b>	<b>Description</b>	<b>Quantity (tons / year)</b>
02 01 04	waste plastics (except packaging)	200
02 01 10	waste metal	50
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04	50
07 02 13	waste plastic	9000
08 04 10	waste adhesives and sealants other than those mentioned in 08 04 09	100
10 08 09	particulates and dust	100
10 08 11	dross and skimmings other than those mentioned in 10 08 10	100
12 01 01	ferrous metal filings and turnings	1500
12 01 02	ferrous metal dust and particles	1500
12 01 03	non-ferrous metal filings and turnings	1500
12 01 04	non-ferrous metal dust and particles	1500
12 01 05	plastics shavings and turnings	300
12 01 99	wastes not otherwise specified	3000
15 01 01	paper and cardboard packaging	8000
15 01 02	plastic packaging	9000
15 01 03	wooden packaging	4000
15 01 04	metallic packaging	300
15 01 05	composite packaging	3000
15 01 06	mixed packaging	6000
15 01 07	glass packaging	500
15 01 09	textile packaging	100
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02	200
16 01 03	end-of-life tyres	20
16 01 17	ferrous metal	300
16 01 18	non-ferrous metal	300
16 01 19	plastic	500
16 01 20	glass	100
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	2000
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15	2000
16 03 04	inorganic wastes other than those mentioned in 16 03 03	1000
16 03 06	organic wastes other than those mentioned in 16 03 05	1000
16 06 05	other batteries and accumulators	200
17 02 01	wood	50
17 02 02	glass	20
17 02 03	plastic	250
17 04 01	copper, bronze, brass	1500
17 04 02	aluminium	1500
17 04 03	lead	300

Identification code	Description	Quantity (tons / year)
17 04 05	iron and steel	2500
17 04 06	tin	300
17 04 07	mixed metals	1000
17 04 11	cables other than those mentioned in 17 04 10	400
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	520
19 10 01	iron and steel waste	100
19 10 02	non-ferrous waste	100
19 12 01	paper and cardboard	50
19 12 02	ferrous metal	100
19 12 03	non-ferrous metal	100
19 12 04	plastic and rubber	500
19 12 05	glass	20
19 12 07	wood other than that mentioned in 19 12 06	50
19 12 08	textiles	20
19 12 10	combustible waste (refuse derived fuel)	4000
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	2000
20 01 01	paper and cardboard	1000
20 01 02	glass	100
20 01 08	biodegradable kitchen and canteen waste	100
20 01 11	textiles	20
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	200
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	1000
20 01 38	wood other than that mentioned in 20 01 37	50
20 01 39	plastics	2000
20 01 40	metals	1500
20 02 01	biodegradable waste	300
20 03 01	mixed municipal waste	100
20 03 07	bulky waste	200
<b>Total:</b>		<b>79370</b>

1.2.1 To the extent of quantities specified in Section 1.1.1 the non-hazardous waste devoted to pre-processing at the site from among the non-hazardous waste allowed to be collected at site and involved in trade:

Identification code	Description	Quantity (tons / year)
02 01 04	waste plastics (except packaging)	200
02 01 10	waste metal	50
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04	50
07 02 13	waste plastic	9000

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<b>Identification code</b>	<b>Description</b>	<b>Quantity (tons / year)</b>
08 04 10	waste adhesives and sealants other than those mentioned in 08 04 09	100
10 08 09	other slags	100
10 08 11	dross and skimmings other than those mentioned in 10 08 10	100
12 01 01	ferrous metal filings and turnings	1500
12 01 02	ferrous metal dust and particles	1500
12 01 03	non-ferrous metal filings and turnings	1500
12 01 04	non-ferrous metal dust and particles	1500
12 01 05	plastics shavings and turnings	300
12 01 99	wastes not otherwise specified	3000
15 01 01	paper and cardboard packaging	8000
15 01 02	plastic packaging	9000
15 01 03	wooden packaging	4000
15 01 04	metallic packaging	300
15 01 05	composite packaging	3000
15 01 06	mixed packaging	6000
15 01 07	glass packaging	500
15 01 09	textile packaging	100
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02	200
16 01 03	end-of-life tyres	20
16 01 17	ferrous metal	300
16 01 18	non-ferrous metal	300
16 01 19	plastic	500
16 01 20	glass	100
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	2000
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15	2000
16 03 04	inorganic wastes other than those mentioned in 16 03 03	1000
16 03 06	organic wastes other than those mentioned in 16 03 05	1000
16 06 05	other batteries and accumulators	200
17 02 01	wood	50
17 02 02	glass	20
17 02 03	plastic	250
17 04 01	copper, bronze, brass	1500
17 04 02	aluminium	1500
17 04 03	lead	300
17 04 05	iron and steel	2500
17 04 06	tin	300
17 04 07	mixed metals	1000
17 04 11	cables other than those mentioned in 17 04 10	400
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	520

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Identification code	Description	Quantity (tons / year)
19 10 01	iron and steel waste	100
19 10 02	non-ferrous waste	100
19 12 01	paper and cardboard	50
19 12 02	ferrous metal	100
19 12 03	non-ferrous metal	100
19 12 04	plastic and rubber	500
19 12 05	glass	20
19 12 07	wood other than that mentioned in 19 12 06	50
19 12 08	textiles	20
19 12 10	combustible waste (refuse derived fuel)	4000
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	2000
20 01 01	paper and cardboard	1000
20 01 02	glass	100
20 01 08	biodegradable kitchen and canteen waste	50
20 01 11	textiles	20
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	200
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	1000
20 01 38	wood other than that mentioned in 20 01 37	50
20 01 39	plastics	2000
20 01 40	metals	1500
20 02 01	biodegradable waste	50
20 03 01	mixed municipal waste	20
20 03 07	bulky waste	200
<b>Total:</b>		<b>78990</b>

1.3./ To the extent of quantities specified in Section 1.1.1 the non-hazardous waste devoted to recovery or reuse at the site from among the non-hazardous waste allowed to be collected at site and involved in trade

Identification code	Description	Quantity (tons / year)
02 01 04	waste plastics (except packaging)	200
07 02 13	waste plastic	5000
10 08 09	other slags	50
10 08 11	dross and skimmings other than those mentioned in 10 08 10	50
12 01 04	non-ferrous metal dust and particles	50
12 01 05	plastics shavings and turnings	300
15 01 02	plastic packaging	5000
15 01 06	mixed packaging	1500
16 01 18	non-ferrous metal	50
16 01 19	plastic	250
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	1000
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15	1000
16 03 04	inorganic wastes other than those mentioned in 16 03 03	1000
16 03 06	organic wastes other than those mentioned in 16 03 05	1000
16 06 05	other batteries and accumulators	100
17 02 03	plastic	250
17 04 06	tin	50
19 12 04	plastic and rubber	500
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	100
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	500
20 01 39	plastics	500
<b>Total:</b>		<b>18450</b>

1.4.1 Hazardous waste allowed to be collected at site and involved in trade:

Identification code	Description	Quantity (tons / year)
03 01 04*	sawdust, shavings, cuttings, wood, particle board and veneer containing dangerous substances	10
06 03 15*	metallic oxides containing heavy metals	100
06 04 05*	wastes containing other heavy metals	100
07 04 13*	solid wastes containing dangerous substances	2000
07 06 04*	other organic solvents, washing liquids and mother liquors	1000
08 01 11*	waste paint and varnish containing organic solvents or other dangerous substances	50
08 01 13*	sludges from paint or varnish containing organic solvents or other dangerous substances	150

08 01 15*	aqueous sludges containing paint or varnish containing organic solvents or other dangerous substances	50
08 01 17*	wastes from paint or varnish removal containing organic solvents or other dangerous substances	20
08 01 19*	aqueous suspensions containing paint or varnish containing organic solvents or other dangerous substances	10
08 01 21*	waste paint or varnish remover	10
08 04 09*	waste adhesives and sealants containing organic solvents or other dangerous substances	200
08 04 11*	adhesive and sealant sludges containing organic solvents or other dangerous substances	10
10 03 04*	primary production slags	35
10 03 08*	salt slags from secondary production	35
10 03 09*	black drosses from secondary production	35
10 04 01*	slags from primary and secondary production	100
10 04 02*	dross and skimmings from primary and secondary production	100
10 08 08*	salt slag from primary and secondary production	50
12 01 14*	machining sludges containing dangerous substances	50
12 01 18*	metal sludge (grinding, honing and lapping sludge) containing oil	50
14 06 03*	other solvents and solvent mixtures	100
14 06 04*	sludges or solid wastes containing halogenated solvents	50
14 06 05*	sludges or solid wastes containing other solvents	5
15 01 10*	packaging containing residues of or contaminated by dangerous substances	1000
15 01 11*	metallic packaging containing a dangerous solid porous matrix (for example asbestos), including empty pressure containers	100
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances	300
16 01 21*	hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14	50
16 02 13*	discarded equipment containing hazardous components (16) other than those mentioned in 16 02 09 to 16 02 12	1000
16 02 15*	hazardous components removed from discarded equipment	300
16 03 03*	inorganic wastes containing dangerous substances	150
16 06 01*	lead batteries	100
16 06 02*	Ni-Cd batteries	100
17 04 09*	metal waste contaminated with dangerous substances	300
17 04 10*	cables containing oil, coal tar and other dangerous substances	100
19 12 06*	wood containing dangerous substances	50

19 12 11*	other wastes (including mixtures of materials) from mechanical treatment of waste containing dangerous substances	200
20 01 21*	fluorescent tubes and other mercury-containing waste	200
20 01 27*	paint, inks, adhesives and resins containing dangerous substances	50
20 01 29*	detergents containing dangerous substances	1000
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	100
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	1000
<b>Total:</b>		10420

1.5.1 To the extent of quantities indicated in Section 1.4.1 the hazardous waste permitted to be pre-treated at site from among the hazardous waste allowed to be collected at site and involved in trading activities:

Identification code	Description	Quantity (tons / year)
06 03 15*	metallic oxides containing heavy metals	100
06 04 05*	wastes containing other heavy metals	100
07 04 13*	solid wastes containing dangerous substances	2000
07 06 04*	other organic solvents, washing liquids and mother liquors	1000
08 04 09*	waste adhesives and sealants containing organic solvents or other dangerous substances	200
10 03 04*	primary production slags	35
10 03 08*	salt slags from secondary production	35
10 03 09*	black drosses from secondary production	35
10 04 01*	slags from primary and secondary production	100
10 04 02*	dross and skimmings from primary and secondary production	100
10 08 08*	salt slag from primary and secondary production	50
15 01 10*	packaging containing residues of or contaminated by dangerous substances	1000
15 01 11*	metallic packaging containing a dangerous solid porous matrix (for example asbestos), including empty pressure containers	100
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances	300
16 01 21*	hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14	50
16 02 13*	discarded equipment containing hazardous components (16) other than those mentioned in 16 02 09 to 16 02 12	1000
16 02 15*	hazardous components removed from discarded equipment	300



16 03 03*	inorganic wastes containing dangerous substances	150
16 06 01*	lead batteries	100
16 06 02*	Ni-Cd batteries	100
17 04 09*	metal waste contaminated with dangerous substances	300
17 04 10*	cables containing oil, coal tar and other dangerous substances	100
20 01 29*	detergents containing dangerous substances	1000
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	100
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	1000
<b>Total:</b>		<b>9355</b>

1.6.1 To the extent of quantities indicated in Section 1.4.1 the hazardous waste permitted to recovery or reuse at site from among the hazardous waste allowed to be collected at site and involved in trading activities:

<b>Identification code</b>	<b>Description</b>	<b>Quantity (tons / year)</b>
06 03 15*	metallic oxides containing heavy metals	50
06 04 05*	wastes containing other heavy metals	50
07 06 04*	other organic solvents, washing liquids and mother liquors	1000
10 04 01*	slags from primary and secondary production	50
10 04 02*	dross and skimmings from primary and secondary production	50

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15 01 10*	packaging containing residues of or contaminated by dangerous substances	600
16 02 13*	discarded equipment containing hazardous components (16) other than those mentioned in 16 02 09 to 16 02 12	500
16 03 03*	inorganic wastes containing dangerous substances	50
20 01 29*	detergents containing dangerous substances	1000
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	1000
<b>Total:</b>		<b>4350</b>

## 2.1 Licensed waste management activity:

Collection of the non-hazardous waste specified in Section 1.1 of the Decision at the site concerned or at some rented premises and the trading with the same, additionally, the pre-processing of non-hazardous waste at the site concerned in accordance with Section 1.2, and the recovery or reuse of non-hazardous waste at the site concerned as per Section 1.3 as well as collecting and trading with the hazardous waste at the site concerned pursuant to Section 1.4, additionally pre-processing of hazardous waste at the site concerned as per Section 1.5 as well as the recovery or reuse of hazardous waste at the site concerned in accordance with Section 1.6 of this Decision.

The waste management activities shall be construed in accordance with the definition set forth in Annex 2 of Government Decree 439/2012 (XII.29) on the registration and official licensing of waste management pursuits [hereinafter referred to as the: Government Decree 439/2012. (XII. 29.)]:

- \_ E02 — 03 grinding (crushing, smashing, chopping, grinding),
- \_ E02 — 04 compressing, baling, coarse-cutting (e.g. agglomeration, regranulation),
- \_ E02 - 05 sorting by features of shape (classification), \_ E02
- 06 sorting by material quality (classification),
- \_ E02 — 08 dismantling electric installations scrapped as waste.

Definition of recovery or reuse in accordance with Annex 2 to the Decree 3/2016 (VI.28.) of the Ministry of Agriculture on the listing of disposal and recycling operations related to waste management:

- \_ R3 Recovery or reworking of organic substances not used as solvents (including composting, other biotransformation operations as well as gasification and pyrolysis, provided that the components of the latter are utilised as chemical substances), \_ R4 Reclaiming, reworking metals and metallic compounds,
- \_ R 12 Transformation requisite before any of the operations R1—R11 is implemented (in the lack of an R-code this operation may include any preparatory actions preceding the recovery or recycling, such as sorting, grinding, compacting, pelletizing, desiccation, crushing, conditioning or segregation before operations R1—R11).

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Aggregate area of the site is 50689 m<sup>2</sup>. Waste management has been carried out in 4 production halls (1200 m<sup>2</sup>, 2000 m<sup>2</sup>, 2035 m<sup>2</sup>, 600 m<sup>2</sup>) and an uncovered outdoor area of 4000 m<sup>2</sup> with solid pavement.

The 4 hall-buildings accommodate the pre-processing and recovery processes carried out on waste from different industrial facilities.

2 floor scales of 3 tons measure-limit are used to weigh incoming hazardous and non-hazardous waste, or if necessary, weighing of the waste is performed using a rented 60-ton calibrated platform-scale under lease contract, then the measurement results are recorded.

#### Collecting and trading of non-hazardous waste

Using a code for identification, the non-hazardous waste supplied to the premises is accepted after checking the delivery note or consignment note accompanying the shipment.

The waste devoted to collecting only is prepared for transit transport, then the properly packed waste is loaded in trucks and forwarded to licensed recipients.

The License Holder's collection and trading activities are impossible to sharply distinguish for in certain cases some waste identified by a code is once procured while in other cases it is just taken over either against some charge or for free.

#### Primary Processing of Non-hazardous Waste

##### Pre-processing of Plastic and Paper Waste:

Depending on the type and size of materials, recyclable and non-recyclable plastic waste packed in big-bags or boxes are crushed and minced in bulk by means of the shredders.

The incoming paper cardboard and plastic packaging waste is sorted and are compressed for baling. The incoming baled waste (mainly packaging and RDF base material) is collected with logistical purposes and are subsequently transported by direct-freight trucks to different licensed waste recycling companies or to other premises of the License Holder for further processing.

##### Pre-processing of metal waste:

Until the containers are filled-up, the collected and sorted metal waste is stored in the designated collecting containers. Such waste is transferred to metallurgic plants or large metalworks.

##### Pre-processing of waste electronic-devices:

Using manual tools, the workers separate diverse types of waste electronic devices and the sorted fractions are sold.

##### Pre-processing of demolition waste

Demolition waste is sorted if necessary and the useful fractions are sold to licensed recycling companies while the waste including any organic particles is transferred to another waste disposal company.

##### Sorting cement industrial (RDF) waste

The RDF-waste of proper calorific value (approx.: 27,000 kJ) is produced by combining in a sufficient proportion the selected and ground paper or foil contaminated plastic waste and the composite materials not recyclable any further.

At the site concerned, the sorted RDF waste is baled and subsequently transported to the premises of the License Holder in Vác for further processing, where the non-recyclable plastic material and other waste of high calorific value cement industrial refuse-derived fuel is produced.

### Primary processing of wooden packaging waste:

The incoming single-way broken and non-reusable wooden packaging waste is sorted. Any possibly contaminated, oil stained glued and laminated panel boards or ones contaminated with fumigating agent are separated. Only wood waste not contaminated with any alien substances or hazardous components are processed.

The wood waste is transported to contracted recycling companies that produce compressed fuel such as briquette or pellet from the wooden waste.

The waste prepared for transportation and properly packaged is transported by direct-freight trucks to the recipients.

All other types of refuse or waste are compressed.

### Non-hazardous waste recovery

#### Plastic waste recovery

Incoming recyclable and non-recyclable plastic waste (more precisely: PE, PP, HDPE, pc, PC/ABS, PS, PMMA, PET, PA or ABS plastic waste) packed in big-bags are sorted, then

\_crushed and ground in bulk by means of the shredder.. while the foil type waste is compressed by material type and colour.

Incoming compacted or non-compacted clear plastic packaging (code: 15 01 02) waste, received from partners, are sorted by type and colour and subsequently ground thus highly clear base material with high volumetric weight (500 kg/m<sup>3</sup>) is produced that is apt for use in plastic injection moulding machines and extruders without the need for any further treatment. This secondary stuff is used to produce agricultural foils, plastic sacks, plastic columns, furniture, pallets, crates and other finished products.

After sorted by quality, type and colour, the mixed packaging (code 16 01 06) waste are fit for treatment with other packaging waste.

Grinding:

Other useful plastic waste types are crushed and ground. A sieve integrated in the grinding machine ensures sufficient grain size of the ground material. As an outcome, the grain size and purity guarantee that the product requires no further treatment or pre-processing prior to injection moulding or extruding. This secondary stuff is used to produce plastic columns, furniture, pallets, crates, electricity meter cover, venetian blinds, venetian shutters, houses for variegated electrical installations, trays for parts and discs.

#### Electronic waste recovery

Incoming waste electronic devices are manually dismantled and sorted. Waste electronic devices are preliminarily disassembled by means of manual tools on the dismantling bench. In the course of waste management by the License Holder the segregated plastic waste is processed, while metal waste is sold to partners, such as metalworks.

Pre-selected or screened electronic waste is chopped by a heavy-duty shredder, and a sieve with 5 to 8 mm clear mesh is used for grading. The micro-powder fraction, being the by-product of grinding, is exhausted into a closed system and collected in big-bags until transferred to other licensed organisations. The ground substance is transmitted to the aerated separator where plastic and metal fractions are segregated. The metal fraction of segregated substances might still contain plastic particles or PBC-particles. To achieve perfect purity, the impure metal fractions are mechanically separated by means of a vibrating table. Vibrating tables are also suitable for segregating particles with diverse metal content by weight. The metal fractions sorted so are sold to metallurgic plants as secondary raw material.

### Hazardous waste collection and trade

Hazardous waste delivered to the site is accepted based on the delivery note accompanying the shipment and the codes are used for identification.

The waste devoted to collecting only is prepared for transit transport, then the properly packed waste is loaded in trucks and forwarded to licensed recipients.

The License Holder's collection and trading activities are impossible to sharply distinguish for in certain cases some waste identified by a code is once procured while in other cases it is just taken over either against some charge or for free.

Hazardous waste is stored in the designated hazardous waste storage on 2035 m<sup>2</sup> floor space area in the warehouse. Hazardous waste is stored in drums or cases conforming to ADR requirements and specifications. 10 pieces of trap-troughs are provided for the storage of liquid waste. Incoming solid hazardous waste packed in big-bags are compressed together with the bag depending on the material size.

Packages of liquid hazardous waste are stacked onto pallets and fixed by shrink-wrapping. Any possibly damaged packages containing the liquid hazardous waste are deposited in standard steel hazardous waste collecting containers. Pre-treated hazardous waste with the waste identification code attached and the accompanying waybill "SZ" shall be transferred to any validly licensed organisations.

### Primary processing of hazardous waste

Preparation of hazardous waste (sorting, compacting, chopping, dismantling or disassembling, repackaging) is carried out in the production hall at the designated area.

Compacting is performed by means of a double-chamber Avermann type baling machine. 1 m large gully-tank recessed in the floor is executed to collect any fluids escaping during the baling activity and liquid waste collecting from where any such escaped fluids are removed as hazardous waste.

Waste electronic devices considered hazardous are disassembled using manual tools and collected selectively by material type and after removing the hazardous waste components the rest of fractions are sold, disposed of or handed over for thermal utilization.

### Sorting of refuse-derived fuel (RDF)

At the premises in Vác, the License Holder produces refuse-derived fuel from plastic packaging and other waste with high calorific value not reusable any longer for any other purposes. The refuse-derived fuel produced at the premises in Vác is supplied exclusively to the Duna-Drava Cement works.

At the site concerned, the sorted RDF waste is baled and subsequently transported to the premises of the License Holder in Vác for further processing, where the non-recyclable plastic material and other waste of high calorific value cement industrial refuse-derived fuel is produced.

### Cinder waste

Diverse cinder waste, supplied to the premises concerned, has different valuable metal content to varied extent and are sorted considering the rate of such metal content. The cinder waste is shipped to the site in crucible-packaging which are sold after sorting by metal-content with the help of a manual metal-analyser.

After prepared for transportation and properly packaged waste is transported to the recipients.

### Pelletized seed

Environmental Protection and Nature  
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The pelletised seed waste, coded 07 04 13\*, is delivered to the site in big-bags and boxes where it is grinded to reduce the size. Size reduction is requisite to achieve higher efficiency when the waste is burned later on.

Incoming hazardous waste is transmitted to an appropriately licensed waste management or a waste recycling company.

#### Hazardous waste recovery

##### Plastic waste recovery

Incoming recyclable and non-recyclable plastic waste packed in big-bags are sorted, then crushed and minced in bulk by means of the shredders while the foil type waste is compacted by material type and colour.

##### Waste detergent recovery:

The License Holder is also engaged in detergent production. In essence, detergent production includes purchasing of flawless but for any reasons end-of-line stock in retail packaging from the manufacturer's logistical warehouse. Such end-of-line products are typically household detergents, washing powder or liquid washing agents and dish-washing liquids. Detergents at retail points of sale are charged into IBC tanks and modified in concentration, colour or scent, in accordance with the formula approved by the original manufacturer. The products are allowed to be sold to wholesale companies exclusively..

When washing liquid capsules are being manufactured, waste is also generated as by-product of processing. In general, due to wrong machinery setting, these are sound capsules with lower filling-volume than required by the specifications or damaged capsules that despite being non-merchantable contain some flawless detergent-filling encapsulated. The License Holder has developed some manufacturing aggregate suitable for the processing of such capsule-type waste to separate the content from the capsule casing itself. The working principle of this aggregate is based on extrusion with increasing pitch. The secondary waste produced in the course of this procedure is prepared for thermal utilization at the License Holder's site in Vác.

##### Electronic waste recovery

Incoming waste electronic devices are manually dismantled and sorted. Waste electronic devices are preliminarily disassembled by means of manual tools on the dismantling bench. In the course of waste management by the License Holder the segregated plastic waste is processed, while metal waste is sold to partners, such as metalworks.

Certain components (e.g. battery, display) integrated in hazardous waste electronic devices are, in general, easy to remove thus the left-over units enter the waste management technology process as non-hazardous waste.

Pre-selected or screened electronic waste is chopped by a heavy-duty shredder, and a sieve with 5 to 8 mm clear mesh is used for grading. The micro-powder fraction, being the by-product of grinding, is exhausted into a closed system and collected in big-bags until transferred to other licensed organisations. The ground substance is transmitted to the aerated separator where plastic and metal fractions are segregated. The metal fraction of segregated substances might still contain plastic particles or PBC-particles. To achieve perfect purity, the impure metal fractions were mechanically separated by means of a vibrating table. Vibrating tables are also suitable for segregating particles with diverse metal content by weight. The metal fractions sorted so are sold to metallurgic plants as secondary raw material.

##### Tin slag waste recovery

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Diverse tin slag waste received from business partners might have different valuable metal content (e.g. silver) to varied extent and are sorted considering the rate of such metal content. The tin slag waste is received at the site in crucible-packaging which are sold after sorting by metal-content with the help of a manual metal-analyser. By means of the mentioned device the waste is sorted by value categories then it is put into an electrically heated melting unit. The tin slag waste is melted by the unit within 5 to 10 minutes and the hot liquid melt are filled into casting moulds and cooled down. The metal bricks produced this way are sold as secondary raw material to metallurgic plants.

#### Battery waste recovery

Minor electric devices are operated by batteries produced with the use of cascade battery cells in series. It is typical to scrap batteries that the majority of cells are still operable just some fault occurred to the series connection or only 1 or 2 cells are damaged on account of which the whole battery fails to conform to the specified requirements. Such waste types after receipt and following careful consideration are stored for a while then are manually disassembled and sorted by type in the workshop in accordance with the following: selection by sort, type and size; dismantling of batteries into cells; inspection by a manual gauge to determine the technical condition and recycling potentials of battery cells.

Disassembling is carried out manually. Sorting of the disassembled components is a crucial point of checking in the treatment process. Selective collection and separated depositing of waste are ensured both at processing and organisational levels.

Although it is impossible to define the volume of secondarily formulated waste accurately, as a rule, their quantities are below the quantities of collected waste.

After weighing, the parts prepared for recovery or reuse in accordance with the client's demands are loaded on trucks, the relevant data are recorded then arrangements are made for transportation away. Such parts are sold to service shops or battery manufacturers thus they are recycled as secondary raw materials.

Dismantled parts, unsuitable for recycling or recovery, developing in the course of the technological process as by-products or secondary waste are treated by the License Holder in some other processing technologies or are sold to specialised companies not just possessing adequate technologies but also the required licences.

#### Preparation and exploitation of web stores' waste:

E-commerce has gained an extending ground recently. Besides its economic benefits and convenience however a growing amount of waste is being produced in this form of trade. Not every transaction becomes a successful purchase therefore dissatisfied customers will return the products to the merchants. Due to financial considerations, only a restricted proportion of such returned goods are re-sold by the merchants. Waste generated in the course of e-commerce must be managed somehow. The License Holder is contemplating to take over any such waste and to exploit it to the possibly greatest extent.

Incoming waste is manually sorted. Organoleptic properties of waste are inspected and if necessary verified by instruments to establish the condition of the waste reliably. Depending on the findings of such inspections, certain fractions might be sold: sale of recyclable products, parts and components; foodstuff fractions are sold to biogas plants, paper and plastic packaging reused for the purposes of the License Holder's own technologies or via some partner company; disposal of leftover materials by depositing in a landfill or involving some other waste management plant.

In the case of waste taken over for recovery or recycling or the same running through such reuse processes the average ratio of exploitation is estimated to be 50%, additionally, 45% of secondary waste is so merely 5% of such waste is deposited at landfills.

### 2.1.1 Personal conditions

License Holder employs any environmental consultant agents to perform the activities concerned and to ensure adequate staff and personnel.

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## 2.2/ Tangible Assets

\_ Calibrated bridge-scale of 60 tons measuring limit (under a rental agreement)  
\_ 2 calibrated floor scales of 3 tons each, \_ 14 fork lift trucks (diesel and electric), ■ bailing press, \_ shredder, \_ polystyrene compacting machine, \_ sledge mill, \_ screw-type extruder devoted to processing capsuled products (developed by the license holder), ■ agglomerating equipment,  
\_ 2 multi-chamber cyclic baler, \_ compacting equipment with container..  
cutting torch, \_ electric and conventional hand tools, \_ open and closed storage vessels.

## 2.3/ Financial assets

Relevant to the pursuits concerned, the License Holder has taken a liability insurance covering also environment pollution related insurance claims (Policy No.: AHB723486449).

## 3.1 Requirements for the pursuit of licensed activities:

- 1 All relevant statutes and regulations are expected to be observed in the course of licensed activities without any harmful impact on environment. The District Office must be informed of any damages caused while performing the activities without delay (via telecommunication means within 24 hours and in writing within 48 hours) to enable immediate damage prevention.
- 2 Waste over 3 tons weight, impossible to be weighed by means of a floor scale must be weighed beforehand and the bill of weight must be presented before any such waste may enter and be admitted to the premises.
- 1 1. The License Holder is permitted to carry out collecting, resale and primary processing of other municipal waste (code: 20 03 01 - including mixed municipal waste) exclusively after the qualification permit relevant to waste management as a public service activity has been obtained or as a sub-contractor employed by any organisation bearing such qualification permit.
4. Environmental pollution must be avoided during waste collecting, resale, primary processing and recycling activities are being carried out at the premises concerned. The License Holder is obliged to eliminate any damage or pollution that might possibly be caused in the course of activities and to restore the original state at the site.
5. When carrying out the activities concerned, the License Holder must fully observe the provisions stipulated in Government Decree 225/2015 (VIII.7.) on detailed rules governing activities related to hazardous waste must be fully observed and the activities must be performed with no harmful impact on environment.
6. The License Holder must obtain documents evidencing that the end-of-waste status criteria have been met in accordance with Section 9 (1) of the Act CLXXXV of 2012 on waste (Act on Waste) relevant to the recycled hazardous and non-hazardous waste.
7. Sections 15 (5) and 58 (3) of the Act on Waste rule that any hazardous and non-hazardous waste received is allowed to be stored for a maximum of 1 year (including pre-treatment) prior to recovery or recycling out of consideration for Section 12 (3) of the Waste Act as well.
8. Hazardous and non-hazardous waste as well as secondary-waste are allowed to be transmitted to a waste management company holding valid licenses for waste management relevant to the waste code concerned or the IPPC license (Integrated Pollution Prevention and Control). License Holder shall make sure that the contracted waste management company possesses the required licenses.



9. Selectively-collected pre-treated recyclable non-hazardous waste are allowed to be transmitted for the purpose of waste recycling only.
10. Waste electric and electronic devices must be transmitted for waste management to satisfy the required ratio of recycling and reworking specified in Government Decree 197/2014 (VIII.1.) Section 2, Annex 2, on waste management activities related to electric and electronic devices and it shall be ensured that the criteria set forth in Section 26 (1) on further treatment shall also be satisfied.

License Holder shall employ personnel with the qualifications requisite for the performance of waste electronic device management in accordance with Section 9(1) of Government Decree 439/2012. (XII. 29.).

12. Protection of the area designated as battery and accumulator-deposit shall comply with the technical requirements set forth in Section 22 (2) of the Government Decree 445/2012. (XII. 29.) on battery and accumulator related waste management (hereinafter referred to as Gov. Decree 445/2012. (XII. 29.)).
13. Refuse battery and accumulator shall be transmitted for further management so that the recycling ratio specified in Annex 5 of the Government Decree 445/2012. (XII. 29.) be met.
  14. The volume of the non-hazardous waste allowed to be contemporaneously collected at the site (both by type and altogether) is max. 2,600 tons, considering also the annual limit of each waste type receivable.
15. The volume of the hazardous waste allowed to be contemporaneously collected at the site (both by type and altogether) is max. 425 tons, considering also the annual limit of each waste type receivable.
16. The License Holder shall be obliged to collect diverse hazardous and non-hazardous waste types segregated, properly labelled at the designated area in the collecting containers intended specifically to the sort and type of waste concerned. The License Holder must ensure that different waste types shall not be or get mixed.
17. License Holder is not allowed to stockpile any waste at the site, it must be continuously ensured that the waste is either reused or disposed of.
18. Hazardous and non-hazardous waste, generated in the course of the licensed activities, must be classified in accordance with the Decree 72/2013 (VIII. 27.) Annex 2 of the Ministry of Rural Development (hereinafter referred to as Decree 72/2013 (VIII. 27) of VM) on List of Waste (LoW).
19. Relevant provisions stipulated in Government Decree 246/2014 [IX.29.] on the layout arrangement of specific waste collecting facilities [hereinafter referred to as the: Government Decree 246/2014] shall be complied with regarding areas intended to serve as storing and collecting space for received and generated waste.
20. Combustible waste shall be collected at an area of the site considered safe in terms of fire protection.
21. Conditions required to protect the waste against ablation or carry-away by the wind as well as to ensure orderly arrangement, maintenance and cleaning of the site must be permanently ensured.
  22. Air pollution must be prevented or diminished by the latest available technology.
  23. Offensive odour-load on inhabitants deriving from the activities concerned must be hindered.
  24. To avoid diffuse air-load the site, the equipment and the carrier vehicles must be permanently cleaned and maintained.
  25. Appropriate measures shall be taken to ensure that the waste does not cause any air load during the loading process or when stored outdoors.
26. The License Holder is obliged to abide by the requirements set forth in the license application documents and damage recovery plan.
27. Relevant to the pursuits concerned, the License Holder must take and maintain a liability insurance covering also environment pollution related insurance claims.

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28. The License Holder is expected to report to the District Office any change to the conditions stipulated in the license or discontinuation of waste management activities within 15 days following the occurrence thereof.
  29. The License Holder is expected to maintain register of the waste management activities in compliance with the applicable regulations and to provide relevant data to the District Office at specific intervals.
  30. License Holder shall be obliged to pay to the District Office the annual supervisory fees by February 28 each year for the supervision and control duties implemented by the District Office relevant to the License Holder's sites each respectively according to the rate of such fees stipulated in special statutes.
- 3.1./ The Metropolitan Government Office of Budapest, General Department of Public Health has consented to the implementation of hazardous waste management activities in terms of public health issues in its Decision No. BP/PNEF-TK1/016353/2018 without stipulating any further requirements.
- 3.2/ Pest County Government Office Gödöllő District Court Department of National Health has consented to the implementation of non-hazardous waste management in terms of public health issues specifying further requirements as follows:
- 1./ Rodent and insect control on the storing area of machines and other devices shall be implemented, if necessary, but at least once a year.
  2. Machines, equipment and other devices used for Waste Management shall be regularly cleaned and disinfected - except for the washing of waste collecting tank - at a paved area where washing space is available and the waste water is drained following preliminary treatment and purification either into a tank substituting public service or into the public sewer.
  3. Environmental pollution -soil, ground water and air pollution- must always be prevented and avoided when the waste is received, managed or transported away.
  4. Waste management activities must not disturb (air pollution, noise load, etc.) the inhabitants in the district concerned.
- 3.3.1 The Metropolitan Directorate For Disaster Management, competent Department of Disaster Management Authority (hereinafter referred to as the: FKI-KHO) has consented to the implementation of hazardous and non-hazardous waste management activities in its official opinion report, ref. No.: 35100/8174-1/2018.ált, with the provisions stipulated below:
1. The licensed activities shall be performed avoiding environmental pollution and harms to environment, without polluting the soil or subsurface water, and to hinder impairment to an extent exceeding the (B) pollution limits specified in the annexes of the joint Decree 6/2009 (IV.14) of the Ministries of Environment Protection and Water, Health and Agriculture and Rural Development on the limits and measurement of pollution requisite for protecting the geological medium and subsurface water against pollution.
  2. Provisions set forth in the Government Decree 219/2004 (VII.21) [hereinafter referred to as the Government Decree 219/2004 (VII.21)] on the protection of subsurface water must be fully observed during the implementation of licensed activities.
  3. Machinery / vehicles must be cleaned at washing facilities with appropriate licenses (water use, facility operating and emission permit). Vehicles must not be washed at the premises concerned, unless the adequate equipment and sewage treatment facilities are available and the relevant operating permits are obtained).

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4. Regular checking and maintenance of storage tanks and containers must be performed.
  5. Hazardous waste must be collected in flanged and locking salvage-containers and trap-troughs with oil/acid and alkaline resistant coating and suitable for housing the entire volume as required.
  6. Should any extraordinary events (damage or emergency) occur during the licensed activities the geological medium and the subsurface water must be fully protected.
- 3.5.1 Pest County Directorate For Disaster Management, Gödöllő Disaster Management Agency has consented to the performance of licensed activities in its opinion report as competent authority ref. No.: 36340/664-3/2018.ált. without any further provisions.

Should the applicant fail to satisfy the foregoing provisions voluntarily - either by the set deadline or conforming to the requirements - the provisions set forth in Sections 133 and 77 of the Act CL of 2016 on general public administration procedures [hereinafter referred to as the public administration procedures act] shall be applicable.

Should the District Office establish that the applicant has indicated untrue information in the request for license, the conditions required for the granting of the license cease to exist, the License Holder discontinues the licensed activities, or the License Holder carries out the licensed activities contrary to the provisions stipulated in the license, the legal consequences or sanctions stipulated in Section 84 (1) and (2) of the Act on Waste shall be applied.

Should the License Holder violate any provisions of the statutes on waste management, any directly applicable legal acts of the EU or an official decision, or should the License Holder carry out any waste management activities subject to official permit, consent, registration, or reporting without having obtained the mentioned permit, consent or without registration or reporting or contrary to the same, or fails to inform the environmental protection authority or this information is improperly made regarding the production or development of any by-products, or uses, distributes or stores any waste as a product or by-product, the District Office shall oblige the License Holder to pay the imposed waste management fines in accordance with Section 86 (1) of the Act on Waste.

4.1 This License shall remain in full force until 10 July 2023.

The District Office endorses the amendment of already consented waste storage operating regulations relevant to the License Holder's premises concerned.

It is concurrently established that the License Holder shall be obliged to pay HUF 1,675,000 as administration service fees for the current action. Hereby it is established that the administration service fees have been duly paid.

Appeals against this Decision, addressed to the Pest County Government Office Environmental Protection and Nature Conservation General Directorate but submitted to the District Office - in electronic form in the case of applicants, subject to electronic contact - shall lie within 15 days following the announcement of the decision

Appeals may be lodged exclusively against the challenged decision for reasons directly related to its content or with reference to any grievances or conflict of interests deriving directly from the decision. The appeals need to be sufficiently reasoned. In the appeal the client may refer to any new facts that has not been known to the client in the course of the first instance proceedings or one that has not yet been referred to earlier through no fault of its own. The cost of appeal shall be HUF 837,500, which shall be paid via bank transfer or cash-transfer order (cheque) by post to the District Office's allocation-utilization bank account at the Magyar Államkincstár, to account number: 10023002-00299671-38700006.

## REASONING

On 2 May 2018, the District Office received the License Holder's application, requesting the license for the waste management activities concerned additionally requesting the consolidation and integration of the waste management licenses and permits already issued regarding hazardous and non-hazardous waste management at the site concerned therefore the request is adopted and to avoid duplication, concurrent with the issuance of this license the District Office shall order revocation of the Licenses no.: PE-06/KTF/23390-12/2017 and PE-06/KTF/28610-13/2017.

The District Office consented in its Decision No.: PE-06/KTF/28610-13/2017 to the operating regulations for non-hazardous waste storages applicable to the License Holder's premises concerned, while the operating regulations for hazardous waste storages applicable to the License Holder's premises concerned is consented to by the District Office in its Decision No.: PE-06/KTF/23390-12/2017. The License Holder attached the amended operating regulations to the documents in this licensing procedure.

The District Office stipulated the provisions regarding the waste storage area in accordance with Section 21 (4) of the Government Decree 246/2014 (IX.29.).

The District Office established based on the site inspection of the premises concerned, on 13 June 2018, as well as relying on the application and the attachments thereof, that provided that the foregoing requirements are fully observed the License Holder will not cause any environmental impacts as a consequence of its activities, therefore the activities concerned are in line with Sections 4 and 6 of the Act on Waste.

Types of hazardous and non-hazardous waste involved in collection, trade, primary processing and reuse have been defined in accordance with Annex 2 of the Decree 72/2013 (VIII.27.)

The volume of hazardous and non-hazardous waste concurrently collected at the site has been determined relying on the submitted application, the License Holder's statement, and the technical features of the premises concerned.

Pursuant to Section 39 of the Act on Waste: “

„(1) The property user shall selectively collect any municipal waste generated on the territory of the property, and shall - with the exceptions stipulated in this act - hand it over to the public service provider.

(2) The property user may optionally - in accordance with the criteria set forth in the relevant government decree, ministerial decree, the self-government regulation of the settlement (the metropolitan self-government in Budapest) - transport the selectively collected waste forming part of the municipal waste to the waste collecting point, the waste-yard, to a point of receipt or a public service waste management facility, and may hand the waste over to the authorised person or deposit the waste into the designated collecting vessel. The property user may exercise this right provided that the public service fees have been duly paid for waste management to the Coordinating Body.

(3) The business organisation, as property user, shall ensure management of the selectively collected waste resembling the domestic waste in accordance with Section 31 (2).”

Pursuant to Section 2 (1) of the Government Decree 385/2014. (XII. 31.) on the waste management public service performance criteria:

“2. the waste, falling in the scope of waste management as a public service, is: the waste, including the secondary waste developing as a result of the waste management activity, b.) [...];collected, taken over or transported away in accordance with Section 41 (1) a)-d) of the act on waste

In accordance with Section 42 (1):

in the framework of waste management public service the public service provider:

- a) shall collect and transport away the municipal waste (including the green waste, the miscellaneous waste and the selectively collected waste) collected by the property users in the collecting container fit for use by the public service provider's vehicle
- b) - unless otherwise ordered by any statute under this act - the mixed waste shall be collected and transported away at least once a week,
- c) collect and transport away the trash collected in the framework of junk removal,
- d) collect and transport away the waste collected and received at the waste collecting points, waste-yards or delivery points operated by the public service provider,
- e) collect, transport away and arrange for the management of the waste abandoned or deposited under uncontrolled conditions provided that its waste management contract with the self-government of the settlement extends to such activities,
- f) manage the waste falling in the scope of waste management public service under subsections a) to e) or shall arrange for the management of the same in accordance with subsection (2) by handing over such waste to the waste managing company,
- g) in accordance with 37/B, it shall operate the facilities, assets, properties and other waste management facilities involved in the waste management public services handed over by the Coordinating Body as property manager, and
- h) it shall be obliged to run appropriate customer service in compliance with the requirements set forth in this act."

In accordance with Section 41 (3) of the act on waste: to fulfil the objectives specified in the waste management public service contract and stipulated in paragraph (2) to perform the waste management public service - in the case of public procurement procedures, pursuant to the act on public procurements, it may employ public service subcontractors.

In accordance with the Government Decree 71/2015. (III. 30.) on the appointment of environment protection and nature conservation organisations implementing official and administration duties (hereinafter referred to as the: Government Decree 71/2015. (III. 30.))the national environment protection authority shall act at first instance with nationwide competence as an environment protection authority."

In accordance with the above legislation, the District Office permitted the collecting, trade and primary processing of the waste code: 20 03 01 (other municipal waste, including mixed municipal waste too) in accordance with the provisions set forth in the ruling part of this instrument.

By its Decision No. 11915-2/2017, the Municipal Notary of Kistarcsa Local Government has altered the site operation license issued to the License Holder relevant to the activities concerned and registered the new site operation permit under No. 3/2013, in accordance with the Government Decree 57/2013. (II. 27.) on the rules of certain production and service providing activities subject to site operation permit and the reporting of the establishment of a site as well as the order of site permitting and the rule of reporting.

The FKI-KHO has consented to the implementation of hazardous and non-hazardous waste management activities in its official opinion report, ref. No.: 35100/8174-1/2018.ált, with the provisions stipulated in the ruling section of this decision. The competent authority reasoned its opinion with the following:

"The applicant authority contacted the FKI-KHO relevant to the case concerned and in accordance with Section 55 (1) of the Act CL of 2016 on the general public administration procedures (act

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on general public administration procedures) as well as pursuant to Government Decree 71/2015 (III. 30.) Annex 8, Table II, point 2 on the appointment of environmental protection and nature conservation authorities and administration bodies. After review of the permit request documentation drawn up by István Rogács environmental protection expert in April 2018 attached to the competent authority's request and the data available for me, I have made the decision set forth in the ruling part of this instrument.

Water supply of the site and communal sewage disposal are ensured through the public utility network. In the course of the licensed activity process waste will not be produced. Rainwater from the paved surface is drained into the rainwater drainage system of the site, which is operated by the Lessor of the property. The incoming waste will be processed in a way excluding any contact with rainwater. Plastic and paper waste is stored exclusively on the concrete covered surfaces outdoors.

The area concerned does not affect any water base designated by a valid and final decision in accordance with the Government Decree 123/1997 (VII. 18.) on the protection of water bases, prospective water basis and water facilities supplying the potable/drinking water.

The facility concerned does not affect any high stage riverbed defined in accordance with Section 12 (a), Annex 1, of the Act LVII of 1995 on water management, and it does not affect any high stage riverbed, waterside, or the use and exploitation of any area jeopardised by welling-up water or waterflows, as well as the rules relevant to the order and content of high stage riverbed maintenance planning in accordance with Section 1. (11) of the Government Decree 83/2014. (III. 14.).

The regulations as per Government Decree (VII.21) on the Territory Concerned are enforceable.

The official decision was made with the consideration of Government Decree 147/2010 (IV.29.) on the general rules on activities and facilities intended to water utilisation, protection, and controlling of water caused damages as well as the Government Decree 72/1996 (V.22) on exercising the official power in the field of water management.

This competent authority opinion has been issued considering the Section 55 of the act on general public administration procedures. Individual remedy is precluded in accordance with Section 55 (4) of the act on general public administration procedures.

“Scope of duties and authorities of the FKI-KHO is regulated by Section 1 (1) of the Government Decree 72/1996. (V. 22) on the practice of official water management powers, Section 10 (1) paragraph 2 of the Government Decree 223/2014. (IX 4.) on the appointment of organisations implementing water directorate, official water and water protection related duties. [hereinafter referred to as the: Government Decree 223/2014. (IX 4.)] while the competence of the same is governed by Section 2, Annex 2 of the Government Decree”.

Pest County Directorate For Disaster Management, Gödöllő Disaster Management Agency has consented to the performance of licensed activities in its opinion report as competent authority ref. No.: 36340/664-3/2018.ált. without any further provisions. The competent authority reasoned its opinion with the following:

“The Client submitted its application for the licensing of hazardous waste management activities at the Pest County Government General Department for Office Environmental Protection and Nature Conservation [hereinafter referred to as the authority]. The authority forwarded the competent authority's request, the application and the attachments to my competent authority.

My competent authority performed the disaster management inspection of environmental safety in accordance with Section 30 (3) of the Government Decree 71/2015. (11.30.) [hereinafter referred to as R] and Annex 7 Table II, point 4, and the following was established:

The Client operates the site in terms of waste collection in accordance with the attached documents in full compliance with the statutory requirements, and any escaped hazardous waste will be trapped. The Company employs licensed companies to carry away and take over hazardous waste. Drums, IBC and ADR cases and containers are used for waste storing.

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In accordance with the foregoing I consent to the waste management license relevant to the site registered under the topographical number above.

Section 30 (3) of R as well as Section 55 (1) of the Act CL of 2016 (hereinafter referred to as the Act on General public administration procedures) shall be the legal grounds for my competent authority opinion. Individual remedy as a potential was excluded in accordance with Section 55 (4) of the act on general public administration procedures. The scope of power and competence of my office as a special authority was established in accordance with Section 35 of R (1) d.), Section 22 (1) c) of the act CXXVIII of 2011 on disaster management and the amendment of some related acts, Decree 43/2011 (XI.30) of the Ministry of Domestic Affairs, Annex 1, on the scope of competence of disaster protection agencies.

Expert opinion of the competent authorities involved in this procedure and the reasoning thereof was integrated in the Decision by the District Office in accordance with Section 81 (1) of the act on general public administration procedures. Against the competent authority decisions individual remedy shall not lie in accordance with Section 54 (4) but they are challengeable in the framework of redress against the Decision.

Budapest Metropolis Government Office National Health General Department has consented in terms of public health in its opinion No. BP/PNEF-TKI/01635-3/2018 to the performance of hazardous waste collection, trading, primary processing, and recycling at the site and adduced the reasoning below:

AZELTEX Kereskedelmi és Fuvarozó Kft (registered office: :4032 Debrecen, Péchy u. 11. Kistarcsa, Kulso Raktar krt. 11. (topographical lot number: 5401) requested that the specific issue in point 3, Table I, Annex 7 and Section 30 of the Government Decree 71/2015 (III.30) on the appointment of environmental protection and nature conservation organisations implementing official and administration duties be inspected in the case related to the licensing of the waste management activities at the above premises in the letter of request, filed at the Pest County Government Office Erd District Office Environmental Protection and Nature Conservation General Office no.: PE-06/KTF/12654-3/2018.

I was appointed to act under the specific appointment order No.: BP/PNEF-TKI/008922/2018 of the Budapest Metropolitan Government Office National Health General Department.

In accordance with the Government Decree concerned, in a licensing procedure related to hazardous waste (except for qualification procedures and fine levying) in each case the specialised issues “risks harmful to health and the possible impacts, the way of collecting hazardous waste containing rapidly degrading organic and inorganic substances and quantity approval, storage, national health conditions” must be inspected.

I have reviewed and studied the documentation announced by electronic means and based on the survey of the documents and specialised issues I have established the following:

The ELTEX Kft. has a license for waste management issued under file No.: PE-06/KTF/23390-12/2017 by the District Office relevant to the collection, resale and primary processing of hazardous waste at the premises.

In its latest application the Company requested issuance of a consolidated license for the purpose of extending the existing licenses for an increased quantity of waste (mainly metal waste), the introduction of a new recycling technology and to extend the sort of waste intended to be involved in the recovery activities.

Compared to the original status, regarding hazardous waste, the Company contemplates to increase the volume of metal waste, recycling of hazardous waste electronic devices, and tin slag recovery to be involved in resale, collecting and primary processing as well as the recycling of in-process detergent waste coded: 07 06 04\*, 15 01 10\* and 20 01 29\*.

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The contemplated extension of waste management activities at the premises will still be carried out in the currently rented warehouses, thus construction works are not expected, but additional machinery and equipment will be needed to procure and install.

The Company premises is located on the economic, trading and service provision area of the settlement, near the junction of motorway M0 and main road No 3, thus the transit traffic will bypass the inhabited areas of the settlement. The distance between the Company's business premises and the nearest dwelling houses is 140 m, while the distance between the Pest County Flór Ferenc Hospital and the site is 530 m. The rented area comprises the halls VI, and VIII, a part of halls IV and VIII and the storage place in front of the hall VIII and the office block belonging to hall IV, which also comprises the changing rooms and the sanitary rooms as well. The areas involved in hazardous waste storing and handling have been developed in halls VI, VII and VIII, within locked encompassed areas, with non-permeable floor surface, in covered parts of the halls. The municipal notary of the mayor's office in Kistarcsa issued the operating permit for the business premises under file number: 11915-2/2017, under registration number: 3/2013.

The waste delivered to the Company's premises is first weighed, then the waste is sorted by features and type. Primary processing (to the extent necessary, selecting, compacting, grinding, re-packaging) of the waste received from diverse industrial facilities and recovery of the waste (grinding, mincing and agglomeration) are performed in the warehouse buildings

The waste devoted to resale or collecting only is prepared for transit transport, then the properly packed waste is loaded into trucks and forwarded to the recipients.

In the course of primary processing of the waste, 100% waste is produced from the waste entering the process, but the majority of the outcoming waste is apt for being resold to recycling/disposal companies.

Compacting of the hazardous waste is performed by means of a double-chamber baling machine used only for that purpose. 1 m<sup>3</sup> large gully-tank recessed in the floor is executed to collect any fluids escaping during the baling activity and liquid waste collecting from where any such escaped fluids are removed as hazardous waste.

Waste electronic devices considered hazardous are disassembled using manual tools and collected selectively by material type and after removing the hazardous waste components the rest of fractions are resold separately, disposed of or handed over for thermal utilization.

Refuse derived fuel production is also included in the scope of business activities of the company and this process is carried out at the business premises of the Company in Vác. In the course of the process refuse-derived fuel is produced from plastic packaging and other waste with high calorific value not reusable any longer for any other purposes. At the premises in Kistarcsa the sorted RDF materials are bale pressed and then the product is transported to the business premises in Vác.

Cinder and slag waste developing in diverse production processes, as well as pelletised seed waste treatment are also being performed at the site concerned. Manual metal analysers are used to select the slag or cinder waste by metal composition and subsequently the sorted metal waste is also resold. The essence of processing pelletised seed waste, received under HAK code 07 04 13\*, is to mill the seeds by means of a heavy-duty mill, to achieve the possibly most perfect burning of the seed waste at the end-user. After primary processing the waste is delivered to the cement factory of the Duna-Drava Cement Kft in Vác.

Regarding hazardous waste recycling, the ELTEX Kft will perform the recovery of slag and detergent waste.

Considering slag and cinder waste recovery, the waste is sorted by metal composition with the use of manual metal analysers then the segregated fractions are put into an electrically heated melting unit, then the hot liquid melt is filled into casting moulds and cooled down. The metal bricks produced this way are resold as widely and directly reusable secondary raw material to metallurgic plants.



Recycling of detergent waste includes purchasing of flawless quality products in retail packaging at retail points of sale and are charged into IBC tanks and modified in concentration, colour or scent, in accordance with the formula approved by the original manufacturer. The License Holder has developed some manufacturing aggregate suitable for the processing of such in-process waste including flawless quality detergent developing at the washing-liquid capsule manufacturing companies, which machine is capable of separating the content from the capsule casing itself. The flawless quality washing liquid pressed from the capsules will enter the detergent manufacturing process as base material while the left-over capsule casing is suitable for use as secondary waste for thermal utilization.

In accordance with the documentation dust emission shall not be counted with for the high quality of the products being processed. The crucible is suitable for melting without the emission of smoke and steam so point emitter is not associated with the production technologies and the excess turnover of goods expectable following the project implementation will not cause measurable change in air pollution either.

Public utilities are installed on the property including water supply and sewer. Process water is not used at the site, therefore process waste water will not be generated either. Process equipment will take place indoors either in the hall or on areas with roof. Bale-compacted plastic and paper waste, or plastic waste in big-bag package is waiting for transportation, stored exclusively on the concrete covered surfaces outdoors, therefore ground water and subsurface water pollution is not expectable.

Damage prevention plan is drawn up relevant to the Comany's activities including the rules and information to be followed in the case of emergency.

In accordance with the foregoing, regarding the special issues considered, the issuance of the waste management license is not legally hindered.

Budapest Metropolitan Government Office and the Pest County Government Office have entered into an agreement for the implementation of special official duties, and in accordance with Section 13 of the agreement on official appointment hereby I advise the license holder that except for working time not any costs were expended on the inspection and survey of special issues that required consideration for the decision.”

Pest County Government Office Gödöllő District Court Department of National Health has consented to the implementation of non-hazardous waste management in terms of public health issues specifying further requirements in the ruling part of the decision, with the following reasoning:

“Rodent and insect control on the site shall be implemented at regular intervals.

The Decree 16/2002 (IV.10) of the Ministry of Health on the public health requirements applicable to solid and liquid municipal waste reads that

3 Section 3 (2) Rodent and insect control on the storing area of machines and other devices shall be implemented, if necessary, but at least once a year.

The Decree 16/2002 (IV.10) of the Ministry of Health on the public health requirements applicable to solid and liquid municipal waste reads that

Section 3 (1) Machines, equipment and other devices used for Waste Management shall be regularly cleaned and disinfected - except for the washing of waste collecting tank - at a paved area where washing space is available and the waste water is drained following preliminary treatment and purification either into a tank substituting public service or into the public sewer. Cleaning or washing must not be carried out on public areas within a distance of 500 metres from surface water or along such water.

With the exception of the foregoing the documentation complies with the following statutory requirements:

- Act XI of 1991 on health authority and administration activities;
- Government Decree 201/2001 (X.25) on the quality requirements for drinking/potable water and the order of control and supervision;
- Act XXV of 2000 on chemical safety . EüM-SzCsM Joint Decree 25/2000 (IX.30.) on chemical safety of workplaces;
- Decree 16/2002 (IV. 10) of the Ministry of Health on public health requirements relevant to solid and liquid municipal waste;
- Government Decree 71/2005 (III.30) on the appointment of environmental protection and nature conservation authorities and administrative organisations.”

In terms of air purity protection the District Office has not discovered any excluding factor regarding the activities concerned in accordance with the Government Decree 306/2010 (XII. 23) on air protection provided that the requirements stipulated in the ruling part of the decision are complied with.

The business premises concerned is located on the Economic, Trade and Service area of Kistarcsa. The nearest building requiring protection is in a distance of 125 m (Fenyves Str. 20, topographical lot number: 5513). There are no buildings requiring noise control in the affected zone around the site.

Hazardous and non-hazardous waste treatment and processing take place in the warehouse building. License Holder intends to increase the volume of the earlier licensed waste and extend the sort and types of waste to be processed.

Noise load deriving from the licensed activities exceeding the specified limit is not expected in the environment requiring protection. The statements regarding the noise and vibration protection has been made by the District Office considering the Government Decree 284/2007 (X. 29) on the rules of ambient noise and vibration protection and the joint Decree 27/2008. (XII. 3.) of the Ministries of Environment Protection and Water, and the Ministry of Health on definition of the ambient noise load and vibration limits.

In accordance with the foregoing the District Office has not discovered any causes excluding the licensed activities in terms of noise and vibration protection.

The site concerned does not affect any ex lege protected natural areas in accordance with Section 23 (2) of the Act LIII of 1996 on nature conservation and in accordance with the conservation of protected natural habitats of national importance under a separate statute. Additionally, the property concerned is not a part of the Natura 2000 network specified by the Decree 14/2010 (V.11) on lands affected by nature conservation areas of community interest and the Government Decree 275/2004 (X. 8.) on the nature conservation areas community interest, additionally, the land does not affect any protected surface zones of caves in accordance with Decree 16/2009 (X.8) on designation of protected surface zones of caves. The site concerned does not affect the zone of national ecological network specified in the Act XXVI of 2003 on the National Land Use Framework Plan.

The waste management activity concerned does not offend any landscape or nature conservation interests.

In accordance with the foregoing the District Office has not discovered any causes excluding the licensed activities in terms of landscape protection and nature conservation.

The License Holder submitted screening documentation relevant to the extension project regarding hazardous and non-hazardous waste collection, resale, primary processing and recycling at the site concerned.

The District Office has conducted the preliminary screening procedure in accordance with the environmental impact survey and Government Decree 314/2005. (XII. 25.) Annex 3, on the IPPC licensing procedure (Integrated Pollution Prevention and Control), Section 107 - "Non-hazardous waste recycling plant - par. a) as of 10 tons/ day capacity"; Section 18 - "Metal waste collecting, primary-processing and recycling plant (including auto-scrap deposits) par. a) as of 5 tons / day capacity"; and Section 109 "Hazardous waste deposit and/or recycling plant (provided that it does not belong to Annex 1) par. a) as an individual plant without dimensional restrictions, and as a conclusion of this procedure the Decisions PE-06/KTF/752-6/2018 is passed establishing that the foregoing activities have no considerable environmental impact therefore any further procedure including environmental impact survey is unnecessary. This Decision has entered into force on the 17th day of March in 2018.

In accordance with the foregoing the District Office has not discovered any causes excluding the licensed activities in terms of complex environmental protection.

Allowing for the foregoing the District Office has established that the acceptance of the request is not hindered in terms of environmental protection considerations therefore the requested hazardous and non-hazardous waste collection, resale, primary processing and recycling or recovery is permitted in accordance with the provisions in the ruling part of the decision considering Section 12 (2), Section 13 (2), Section 17 (1) and Section 62 (1) of the Act of Waste, as well as the Sections 7 (2) and 9 (2) of the Government Decree 439/2012.

This License is grounded on Sections 80 to 81 of the general administrative procedures in addition to the foregoing legislations.

Regarding this case the District Office passed a decision No. PE-06/KTF/12654-1/2018 with pending force (hereinafter referred to as the pending decision). Whereas the District Office has passed a decision on merits by this Decision, no legal effect shall be attached to the provisions set forth in the pending decision in accordance with Section 43 (4) of the act on general administrative procedures.

The administration fees of the proceedings have been established in accordance with the Decree 14/2015. (III. 31.) of the Ministry of Agriculture [hereinafter referred to as the FM Decree 14/2015. (III. 31.)] Annex 1, Sections 4.4, 4.5 and 7, as well as Sections 4.4, 4.5, 7 and 11.

The License Holder shall be obliged to pay the administrative service fees in accordance with Section 5 (3) of the FM Decree 14/2015. (III. 31.) The License Holder duly paid the administrative service fees.

The right for appeal is ensured by Section 116 (1) and (2) a) of the general administrative procedure, while the time frame provided for the submission of appeals as well as the form of submission is established by Section 118 (3) of the general administrative procedures.

The fees charged for the appeals are specified by Section 2 (5) of FM Decree 14/2015. (III. 31.).

In accordance with Section 118 (1) and (2) of the general administrative procedures:

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“(1) Appeals may be lodged exclusively against the challenged decision for reasons directly related to its content or with reference to any grievances or conflict of interests deriving directly from the decision.

(2) The appeals need to be sufficiently reasoned. In the appeal the client may refer to any new facts that has not been known to the client in the course of the first instance proceedings or one that has not yet been referred to earlier through no fault of its own.”

One who violates any provisions of the statutes on waste management, any directly applicable legal acts of the EU or an official decision, or should the License Holder carry out any waste management activities subject to official permit, consent, registration, or reporting without having obtained the mentioned permit, consent or without registration or reporting or contrary to the same, or fails to inform the environmental protection authority or this information is improperly made regarding the production or development of any by-products, or uses, distributes or stores any waste as a product or by-product, shall be obliged by the District Office to pay the imposed waste management fines.

Furthermore, please, be advised that the failure to comply with the regulations or the failure to satisfy the provisions specified in the Decision properly the execution shall be ordered in accordance with Section 133 (1) of the general administrative procedure, additionally in accordance with Section 77 of the general administrative procedure procedural fine shall also be levied

the rate of which shall be minimum 10 thousand forints and in the case of natural individuals it may be maximum 500 thousand forints and in the case of legal entities or entities without legal status the rate of such fine may be maximum one-million forints. The procedural fine may be imposed repeatedly even for the reoccurrence of the failure to perform the same obligations.

For your information, Section 9 (1) and Section 108 (5) of the Act CCXXII on the general rules of electronic administration and confidential services the client, organisation, body, agent etc. listed in Section 9 (1) shall be obliged to electronic administration.

An original of this Decision is forwarded for the information of the territorially competent disaster management directorate considering Section 31 (4) of the Government Decree 71/2005 (III.30) on the appointment of environmental protection and nature conservation authorities and administrative organisations [hereinafter referred to as 71/2015 (III.30.)].

Scope of duties and authorities of the District Office acting as environmental protection and nature conservation authority as well as jurisdiction is governed by the Government Decree 71/2015 (III.30.).

Unless an appeal is lodged against this decision without notice, this Decision shall become final upon lapse of the last day of the time frame set for appeals.

Budapest, 26 June 2018

for and on behalf of

Dr Zsolt Szabo Head of District Office

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given under my hand Dr. Szabolcs Cserkúti,  
Head of General Department

in witness whereof:

Served to: in accordance with the administrator's instructions.

Identical in all particulars with the original printed document.

This page does not form part of the original document, it is intended to clauses as required by the relevant statutes.

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