

OPERATING TECHNIQUES

For



Metal Recycling Facility

At

Rabone Lane
Smethwick
Warley
B66 2LF

EAWML 42317
EPR/ZP3691ET

Permit Holder:

Sims Group UK Limited
Long Marston
Stratford-upon-Avon
Warwickshire
CV37 8AQ

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 1 of 28
Authorised by	O Latham	Issue date	Jan 2022

INDEX

Section 1	General Introduction
Section 2	Specified Waste Management Operations
Section 3.....	Emissions Control and Monitoring
Section 4	Management
Section 5	Site Records

APPENDICES

Appendix 1	Rabone Lane Site Location
Appendix 2	Rabone Lane Site Detail
Appendix 3.....	Shredder Process Routing
Appendix 4.....	Shredder Process Description

1. **GENERAL INTRODUCTION**

- 1.1. This Metal Recycling facility will be operated by Sims Group UK Limited. It will form a strategic component of a network of recycling facilities operated by the company throughout England and Wales.
- 1.2. The site will receive process and recover ferrous and non-ferrous metals from scrap and will act primarily as a source of ferrous feedstock for the steel manufacturing industry both in UK and abroad.
- 1.3. The Appendix 1 shows the location of the facility.
- 1.4. Appendix 2 shows all key features of the facility including principle storage and treatment locations.
- 1.5. The site will undertake a range of waste management activities including;
- Storage and treatment of ferrous and non-ferrous metals;
 - Storage and treatment of general mixed scrap metal;
 - Storage and treatment of Waste Electrical and Electronic Equipment (WEEE);

1.6 **Relevant Regulations, Technical Guidance Notes and other documentation**

In accordance with the new Environmental Permitting (England and Wales) Regulations 2010, operators are required to confirm whether their proposed operation will take place in line with standards set by any relevant Environment Agency Sector Guidance Note and legislation. Where the proposed operations will deviate from the relevant Guidance Note or where there is no guidance for the operation, the permit supporting information must include:

1. Description of the operation that will take place at the site
2. Justification of the measures that will be used to control emissions from the processes.

There is no specific Sector or Technical Guidance Note for all the operations at Smethwick Rabone lane, however a number of documents are relevant to the operations and Sims operates in accordance with these:

- Guidance on the Best Available Treatment Recovery and Recycling Techniques (BATRRRT) and treatment of Waste Electrical and Electronic Equipment Directive, DEFRA
- Environmental Permitting Guidance Waste Electrical and Electronic Equipment Directive, DEFRA
- Environmental Permitting Guidance, the Waste Framework Directive, DEFRA
- Sector Guidance Note EPR5.06: Guidance on the recovery and Disposal of Hazardous and Non-hazardous Waste, Environment Agency

Relevant legislation covering the activities on site is as follows:

- Waste Framework Directive
- WEEE Directive
- Hazardous Waste Directive
- ELV Directive

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 3 of 28
Authorised by	O Latham	Issue date	Jan 2022

The facility was a 'Newly Prescribed Activity' that was in operation on 7th January 2013. The facility will undertake the recovery of non-hazardous waste with a capacity exceeding 75 tonnes per day involving the treatment via shredding of metal waste.

Section 5.4 A (1) b (iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving the treatment in shredders of metal waste, including waste electrical and electronic equipment and end - of - life vehicles and their components.

The permit was varied and issued dated 05 June 2018.

A permit variation application is required as the site also has the capacity to store more than 50 tonnes of hazardous waste at any one time.

Section 5.6 A (1) (a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section, except-

- (i) temporary storage, pending collection, on the site where the waste is generated, or
- (ii) activities falling within Section 5.2

The site may also use physical processes to recover hazardous waste with a capacity exceeding 10 tonnes per day

5.3 A(1) a) (ii)

Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—

- (ii) physico-chemical treatment;

This Operating Techniques supersedes all previous Operating Techniques and Working Plans associated with EAWML 42317, EPR/ZP3691ET.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 4 of 28
Authorised by	O Latham	Issue date	Jan 2022

2. SPECIFIED WASTE MANAGEMENT OPERATIONS

2.1. Description of the Site

The location of the site, its boundaries and surrounding features are highlighted in Appendix 1. The site has a frontage to Rabone lane and Foundry Lane. The rear boundary of the site, as viewed from Rabone Lane, adjoins the former Soho Foundry. The surrounding area is predominantly of industrial use.

Access is via the site gates and these are locked at all times when the site is non-operational. Visitors may only gain access if escorted or with specific permission.

2.2 Classification of the Waste Management Operations – Waste Directive Codes

In accordance with Annex IIB of the Waste Framework Directive the site activities falls into the following:

R3: Recycling/reclamation of organic substances which are not used as solvents

R4: Recycling/reclamation of metals and metal compounds

R5: Recycling/reclamation of other inorganic compounds

R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

Extent of the Shredder Installation (Section 5.4 A (1) b) (iv)

STU – Shredder:

Annex II (R codes) – R3: Recycling/reclamation of organic substances which are not used as solvents

R4: Recycling/reclamation of metals and metal compounds

R5: Recycling/reclamation of other inorganic compounds

DAA:

Pre shredding – Pre shredding via pre-shredder serving main shredder. If necessary, the pre-shredder processes (cuts) materials prior to such material entering the shredding process.

Annex II (R codes) - R3: Recycling/reclamation of organic substances which are not used as solvents

R4: Recycling/reclamation of metals and metal compounds

R5: Recycling/reclamation of other inorganic compounds

Downstream Separation - Further separation of fragmented waste following shredding. The separation process includes magnets, trommels, hand sorting and air separation.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 5 of 28
Authorised by	O Latham	Issue date	Jan 2022

Annex II (R codes) - R3: Recycling/reclamation of organic substances which are not used as solvents

R4: Recycling/reclamation of metals and metal compounds

R5: Recycling/reclamation of other inorganic compounds

Shredder infeed storage and immediate output:

Annex II (R codes):

R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

Extent of the hazardous waste mechanical treatment plant (Shredder) Installation (Section 5.3 A (1) a) (ii))

Annex II (R codes)

R3: Recycling/reclamation of organic substances which are not used as solvents

R4: Recycling/reclamation of metals and metal compounds

R5: Recycling/reclamation of other inorganic compounds

Brief description: Mechanical treatment of hazardous waste consisting of shredding, sorting, separation, screening, grading, baling, shearing, compacting, crushing, granulation or cutting for the purpose of recovery of constituent parts and materials. Shredder for batch treatment of hazardous waste.

Note: storage of hazardous waste prior to treatment in Shredder is detailed below.

DAA: Storage of outputs (from hazardous waste treatment).

Annex II (R codes)

R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

Extent of Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes (Section 5.6 A (1) (a))

Annex II (R codes)

R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

Brief description: Temporary storage of hazardous waste from receipt to batch treatment in the shredder or Temporary storage of hazardous waste from receipt to dispatch from site for treatment at another suitably authorised facility (e.g. storage of ELF pending transfer and treatment at an ELF treatment Plant)

Other Waste Activities Remaining Under the Permit

Other permitted treatment activities will include the, treatment of WEEE, manual and mechanical sorting of ferrous and non-ferrous scrap including: separation, grading, shearing, screening, baling, compacting, crushing and hot cutting. These activities may be carried out with the aid of mechanical plant.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 6 of 28
Authorised by	O Latham	Issue date	Jan 2022

Classification of the Waste Management Operations – Waste Directive Codes:

Annex II (R codes):

R3: Recycling/reclamation of organic substances which are not used as solvents

R4: Recycling/reclamation of metals and metal compounds

R5: Recycling/reclamation of other inorganic compounds

R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

2.3 Locations of the Waste Management Operations

Appendix 1 and 2 show the entire area of the site and detail key features of the facility including infrastructure, drainage and storage locations.

Due to the constantly changing operational and commercial pressures of the metal industry, a degree of flexibility with regard to the storage locations is required. Depending of operational demands at any one time, it may be necessary to relocate specified activities within the overall licensed area. However, in the event of such demand, the overriding principle will always be that the operation will be carried out in such a manner to prevent any harm or risk to the environment.

2.4 Operations

The principle activities at the site will be the processing of ferrous and non-ferrous metal scrap for supply as feedstock to the steel making industry in the UK and abroad.

The facility is designed for the specialist recovery of ferrous metals; these may be light or heavy off-cut from manufacturing, obsolete machinery or other equipment from industry, bulky metal-based discards from commercial sector or scrap vehicles and white goods etc. from scrap suppliers or members of the public.

WEEE wastes will be managed in accordance with the WEEE Directive and relevant legislative requirements.

End of Life Vehicles will only be processed through the fragmentiser if they have been depolluted in accordance with ELV Regulations and applicable legislation.

Mixed non-ferrous metals that form a part of the frag feed are separated from the fragmented flow by a combination of air extraction, magnetic, and eddy current separation.

Recovered secondary metals will be similarly sold for resmelting into new materials.

Residual mixed metals from the fragmentation process will be transported to another Sims authorised facility for specialist treatment to recover the individual secondary metals.

Wastes from the process that are currently incapable of further viable treatment for metals recover ('frag waste') will be transported from site for authorised disposal or further recovery.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 7 of 28
Authorised by	O Latham	Issue date	Jan 2022

No wastes will be disposed of at the site.

2.5 Permitted Waste Types

<u>Shredder Installation (Section 5.4 A (1) b) (iv) & Infeed Storage DAA</u>	
Material	EWC code
Waste Metal from Agriculture	02 01 10
Ferrous metal filings and turnings	12 01 01
Non- Ferrous metal filings and turnings	12 01 03
Metallic Packaging	15 01 04
End of Life Vehicles (depolluted)	16 01 06
Ferrous metal from ELV	16 01 17
Non-ferrous metal from ELV	16 01 18
Non Hazardous components from ELV	16 01 22
Non Hazardous WEEE	16 02 14
Non Hazardous components removed from WEEE Restricted to LDA type WEEE, not including pre-treated SMW	16 02 16
Copper, Bronze, Brass from construction and demolition waste	17 04 01
Aluminium from construction and demolition	17 04 02
Lead from construction and demolition	17 04 03
Zinc from C&D wastes	17 04 04
Iron & Steel from construction and demolition	17 04 05
Tin from construction and demolition	17 04 06
Mixed metal from construction and demolition	17 04 07
Cables	17 04 11
Ferrous metal from bottom ash	19 01 02
Iron & Steel from Shredding	19 10 01
Non-ferrous from Shredding	19 10 02
Fluff-light fraction and dust other than those mentioned in 19 10 03	19 10 04
Other fractions other than those mentioned in 19 10 05	19 10 06
Ferrous metal from other waste facilities (mechanical treatment)	19 12 02
Non-ferrous metal from other waste facilities (mechanical treatment)	19 12 03
Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11' e.g. – a mixture of ferrous and non-ferrous metals arising from mechanical treatment.	19 12 12
Non Hazardous WEEE – household/ local authority	20 01 36
Metals – household/ local authority	20 01 40

<u>Output Storage DAA</u>	
Material	EWC Code
Iron & Steel from Shredding	19 10 01
Non-ferrous from Shredding	19 10 02
Fluff-light fraction and dust other than those mentioned in 19 10 03	19 10 04
Other fractions other than those mentioned in 19 10 05	19 10 06
Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	19 12 12

<u>Hazardous Waste treatment (& DAA) Section 5.3 A (1) a) (ii)</u>	
Material	EWC Code
Fluff-light fraction and dust containing dangerous substances	19 10 03*
Other fractions containing dangerous substances	19 10 05*
Other wastes (including mixtures of materials) from mechanical treatment	19 12 11*

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 8 of 28
Authorised by	O Latham	Issue date	Jan 2022

of waste containing dangerous substances	
Premixed wastes composed of at least one hazardous waste	19 02 04*
Hazardous components removed from discarded equipment	16 02 15*
Pre-treated hazardous WEEE	20 01 35*

Non DAA / STU Waste Activities	
Material	EWC code
Waste Metal from Agriculture	02 01 10
Ferrous metal filings and turnings	12 01 01
Non- Ferrous metal filings and turnings	12 01 03
Metallic Packaging	15 01 04
End of Life Vehicles (polluted)	16 01 04*
End of Life Vehicles (depolluted)	16 01 06
Ferrous metal from ELV	16 01 17
Non-ferrous metal from ELV	16 01 18
Non Hazardous components from ELV	16 01 22
Non Hazardous WEEE	16 02 14
Non Hazardous components removed from WEEE	16 02 16
Lead batteries	16 06 01*
Alkaline batteries	16 06 04
Other batteries and accumulators	16 06 05
Copper, Bronze, Brass from construction and demolition waste	17 04 01
Aluminium from construction and demolition	17 04 02
Lead from construction and demolition	17 04 03
Zinc from C&D wastes	17 04 04
Iron & Steel from construction and demolition	17 04 05
Tin from construction and demolition	17 04 06
Mixed metal from construction and demolition	17 04 07
Cables	17 04 11
Ferrous metal from bottom ash	19 01 02
Iron & Steel from Shredding	19 10 01
Non-ferrous from Shredding	19 10 02
Fluff-light fraction and dust other than those mentioned in 19 10 03	19 10 04
Other fractions other than those mentioned in 19 10 05	19 10 06
Ferrous metal from other waste facilities (mechanical treatment)	19 12 02
Non-ferrous metal from other waste facilities (mechanical treatment)	19 12 03
Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11*	19 12 12
Hazardous Batteries	20 01 33*
Hazardous WEEE	20 01 35*
Non Hazardous WEEE	20 01 36
Metals	20 01 40

2.6 Waste Quantities

The maximum throughput per annum will be 374,999 for installation activities and 74,999 for non installation waste activities.

The 'daily treatment capacity' of the shredder STU is 2,640 tonnes, based on 12 hour operation. The shredder will be used to batch treat non-hazardous and hazardous wastes. The daily treatment capacity is therefore an aggregated treatment capacity for S5.3 and S5.4 activities.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 9 of 28
Authorised by	O Latham	Issue date	Jan 2022

The maximum quantity of hazardous waste stored onsite at any one time (excluding ELVs and Small Mixed WEEE awaiting manual treatment) will be 500 tonnes.

Maximum quantities of waste are specified in the Stockpile Management and Fire Prevention Protocol.

The total aggregated throughput of the site will not exceed 449,998 tonnes per year.

2.7 Hours of Operation

Mondays – Fridays – 0630 – 1830.
Saturdays & Sundays – 0700 – 1300.

Lighting will be provided to ensure operational safety when work is undertaken until 18:30 on weekdays during the winter period.

2.8 Waste Acceptance Procedures

Sims Environment Management System will include a Waste Acceptance Procedure. This procedure will detail pre-acceptance procedure, inspection procedure and a specific bale inspection procedure.

The Explosion log

Explosions will be recorded real time by the fragmentiser operator on the system as a delay occurrence/ energy release. A further record will be made rating the energy release 1 – 10, listing the type of waste that caused the explosion and naming the supplier of the waste. A spreadsheet will be maintained allowing explosions to be monitored. As detailed in the Waste Acceptance Procedure, the supplier will be contacted to inform that their waste caused an event and to obtain feedback regarding measures taken to prevent a recurrence.

A schedule 5 notification will be completed for explosions rated 8 and above.

Explosion prevention log

Finally, a record will be made of any Orphaned gas cylinders, LPG tanks or sealed cylinders that are identified and removed prior to fragmentising as a record of potential explosions prevented.

Where these are identified at the initial waste acceptance/ inspection stages, it will be possible to identify the supplier, the waste will be photographed and the supplier will be named on the log and contacted to inform and prevent a recurrence.

Where these items are found but the supplier cannot be identified they will be recorded as supplier not identified and the waste inspection process will be revisited with site operatives to ensure it is robust.

A site visit by a senior commercial representative will be made to suppliers repeatedly providing wastes causing explosion or with the potential to cause explosions and information provided about correct disposal of LPG tanks for example.

Quarantine

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 10 of 28
Authorised by	O Latham	Issue date	Jan 2022

There will be two types of quarantine:

Temporary Quarantine

The temporary quarantine area will be separate from the waste reception and/or main stockpile or infeed areas and will be identified on the site layout plan. Items identified as requiring further inspection will be segregated here. Following inspection, temporary quarantined waste will either be determined suitable for treatment and moved to the relevant storage area, or determined unsuitable and moved without delay to the quarantine area.

Quarantine

The quarantine area will be labelled and will include appropriate containment for quarantined wastes e.g. cages for orphaned cylinders, polyethylene sacks for asbestos or damaged RCF containing catalytic converters, a battery box or other leak-proof & lidded container for containment of potentially leaking non-conforming wastes and a skip or designated area for other non-conforming items. The location of the quarantine area will be identified on the site layout plan.

Orphaned cylinders will be moved without delay to storage in the appropriate cage pending repatriation to the owner. Other non-conforming wastes will be placed immediately in an appropriate container if required in the designated quarantine area until suitable disposal arrangements can be made.

There will be no mixing of non-conforming (quarantined) wastes with authorized wastes. Non-conforming wastes will be stored separately where possible and when legislation requires. Any non-conforming wastes that are defined as Hazardous under the Hazardous Waste Directive will be handled and moved off site in line with the requirements of the Directive.

Where the nature of a quarantined waste is not known, a specialist contractor will be engaged to identify it.

The producer/customer will be informed and all details relating to the load recorded.

Where operationally practicable deliveries of incoming shredder feedstock will be processed as soon as possible and often on the same day. In turn this will ease identification of producer when shredding loads. Due to the constantly changing operational and commercial pressures of the metal industry, a degree of flexibility with regard to storage times is required.

2.9 Waste Storage & Infrastructure

Waste will be treated on impermeable pavement with sealed drainage system.

Clean uncontaminated scrap may be stored on areas of hardstanding.

In order to prevent pollution to land and groundwater, site surfacing and drainage will be visually inspected on a regular basis and at least weekly. Drainage will be thoroughly inspected by an external contractor 6 monthly to ensure that there are no internal blockages. Such inspections and any issues noted will be recorded in the Site Diary. Any areas of surfacing showing wear will be monitored and repaired as soon as reasonably practicable. Any repair works will be recorded in the site diary.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 11 of 28
Authorised by	O Latham	Issue date	Jan 2022

Hazardous wastes will be stored on impermeable pavement linked to a sealed drainage system.

Hazardous wastes will be stored separately from non-hazardous wastes.

Wastes that may contain POPs e.g. SMW, will be stored separately from other wastes.

Fluids will be stored in containers with appropriate secondary containment measures capable of holding at least 110% of the volume of the primary containment vessel. Contaminated surface waters shall be disposed of via an authorized treatment facility as necessary.

Batteries will be stored in leak-proof containers with lids to prevent the ingress of water.

Storage areas will be provided with spillage collection facilities including spill kits. The locations of such spill kits and instructions on their use will be specified in the site's Emergency Contingency and Accident Management Plan. All staff will be trained in the Emergency Contingency and Accident Management Plan. Copies of the plan are distributed to all staff and contractors. Use of spill kits will be reported to site management to ensure regular restocking as required.

Surface waters drain via the site drainage system linked to an interceptor which discharges to the foul water sewer in Foundry Lane. Records of drainage maintenance will be held on site and made available to the Environment Agency on request.

To ensure that waste storage arrangements are being adhered to, monthly checks of the stockpiles are conducted. If issues are identified, then records are made and suitable actions are determined.

2.10 Waste Treatment

Please see appendix 3 and 4 for process descriptions of installation activity.

Please see section 3 and environment risk assessment for details of abatement/ control measures.

All residues from the shredder treatment process will be characterised and assessed for appropriate further processing, recovery or disposal.

Residues will be characterised by the nature of the infeed, the separation process equipment/ downstream technologies employed, which will produce products that are standard and defined. The characterisation will be confirmed by visual inspection.

Residues

ASR Waste is the light fraction that has been removed from the non-hazardous shredded stream by the air cleaning system on the plant.

Non-ferrous residue is the non-magnetic material that is not part of the light fraction removed by the air cleaning system.

Both of the above will under normal circumstances go for onwards treatment at Sims dedicated treatment facilities where suitable processes are available to accommodate the fractions. Other suitably authorised facilities may be used and this would be subject to confirmation of appropriate authorisations and the suitability of the material for the process.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 12 of 28
Authorised by	O Latham	Issue date	Jan 2022

As detailed above, shredder residues will under normal circumstances be destined for further treatment at Sims dedicated facilities or other suitably authorised facility. In extenuating circumstances, should disposal of the residues be required, the shredder residues from the process will be classified as per the Environment Agency Statement on Shredder Residue issued 01 Feb 2005.

The nature of the separation process ensures ferrous output from the shredder will meet Institute of Scrap Recycling Industries ISRI Ferrous Scrap FS-2016 specification 211 & UK equivalent 3b Frag for Shredded Iron and Steel Scrap suitable for recovery in Steelworks. This will be confirmed visually.

Copper armatures & copper wire will be handpicked to meet ISRI Non-Ferrous Scrap NF-2016 Specification Shelmo suitable for recovery in copper smelters/refineries. This will be confirmed visually.

SMW Wastes & Residues

SMW may contain POPs. Currently SMW is stored at Smethwick and consigned (EWC 200135*/36) to Sims Nottingham or other suitably authorized facility for pre-treatment & subsequent treatment.

If SMW was pre-treated / treated at Smethwick it would be stored and batch treated separately from other wastes.

Residues that contain SMW plastics may contain POPs and will be consigned (EWC 190204*) to Long Marston or other suitably authorized facility for further treatment and subsequent destruction of the POPs as detailed below.

Article 7 of the Regulation (EU) 2019/1021 of the European Parliament and of the Council on persistent organic pollutants (the POPs regulation) requires that any POPs in waste plastic is destroyed or irreversibly transformed. Destruction of POPs in the waste plastic fraction is achieved by off-site third-party facilities that accept this residue and destruction of POPs will be achieved by incineration, consumed/ destroyed in the metal smelting process or pyrolysis.

WEEE Wastes

WEEE wastes will generally be received via contracted suppliers hence the type of WEEE material to be stored on site will already be known prior to it arriving on site lessening the likelihood of non-conforming wastes.

WEEE Wastes will be stored and dealt with in accordance to relevant legislative requirements of the WEEE Regulations 2006 and in accordance with DEFRA guidance document 'Guidance on Best Available Treatment Recovery and Recycling Techniques (BATRRRT) and treatment of Waste Electrical and Electronic Equipment (WEEE). WEEE wastes will be stored in the locations shown on Site layout plan in appendix 2.

All WEEE wastes will be stored on areas with impermeable pavement with sealed drainage system.

Storage areas will be inspected daily.

In the case of any spillages, these will be dealt with immediately following the procedure for spillages as detailed in the Emergency Contingency Plan.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 13 of 28
Authorised by	O Latham	Issue date	Jan 2022

Small Mixed WEEE (SMW) will be treated on site (Not currently undertaken).

Pre-treatment will either take place on site or pre-treated SMW will be delivered to site from other facilities.

All SMW material will be delivered and stored separately to other waste piles, in areas allocated as SMW storage on the site layout plan in Appendix 2.

SMW will be stored and manually pre-treated on site to remove components that require removal prior to mechanical treatment. Manual pre-treatment of SMW will take place undercover. Storage of pre-treated SMW will be separate to other waste types. Storage and pre-treatment areas are shown on site layout plan in Appendix 2.

Pre-Treatment will involve the manual removal and separate storage of the following required items:

- SMW/ Components containing fluids,
- Toner cartridges,
- CFCs, HFCs, HFCs and HCs,
- TV's and monitors,
- Fluorescent lamps and switches containing mercury,
- Hazardous Batteries,
- Asbestos,
- Refractory ceramic fibres,
- Radioactive substances, and
- Other non WEEE hazardous items (e.g. gas cylinders);

These items will be stored in appropriate sealed and/ or leak proof containers, with cover where appropriate, prior to removal to suitably authorised facility.

There are minimal SMW items that contain Asbestos, Refractory Ceramic Fibres (RCF) or Radioactive substances and hence we do not expect to find these in the SMW.

Asbestos has not been used in WEEE since 1985 and RCF's were only used in high temperature industrial applications e.g. Furnace/ Kiln linings.

WEEE containing radioactive substances is also unlikely to be present but any radioactive items that are present are detected by our radiation detection process at the weighbridge. Operatives will be trained to be vigilant for them as they would for any non-conforming items.

We do not expect WEEE items containing CFC's, HFC's etc. and Fluorescent lamps to be present in the SMW stream as these WEEE wastes have been segregated from other WEEE streams at source (e.g. CA sites etc.) for a considerable period of time. Operatives will be trained to be vigilant for them as they would for any non-conforming items.

Operatives will be trained to identify SMW wastes likely to contain batteries and remove these at the pre-treatment stage. Batteries removed will be stored appropriately, separate by hazard and in leak proof containers with lids or undercover.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 14 of 28
Authorised by	O Latham	Issue date	Jan 2022

Treatment of Pre-treated SMW

There will be a final visual inspection of pre-treated SMW prior to it being treated through the shredder. Any items requiring further pre-treatment will be removed to the pre-treatment area.

All material will be delivered and stored separately to other waste infeed piles. The location of the pre-treated SMW storage will be as noted on the site layout plan in Appendix 2.

SMW will be treated as discrete batches of material. The equipment used / process route will be the same as for other waste streams. After shredding, the metal will be recovered by magnets and remaining waste streams will be consigned to Sims Long Marston for further treatment and refining.

Residues from Pre-treated SMW may also be stored and treated on site. As per pre-treated WEEE, storage and treatment would be in discrete batches to ensure batches of hazardous waste are stored and processed separately to batches of non-hazardous waste.

2.11 **Energy Usage**

Sims has an Energy Group and Energy Policy to ensure that energy will be used efficiently at the site. This scope of the Energy Group will be extended to include this facility and to identify the energy consumption and methods of saving energy at the site.

In relation to the shredder STU; In order to improve energy efficiency the site will minimise start-ups and ensure shredding at maximum efficiency to reduce hours run, the downstream will be turned down when the machine is idling and maintenance procedures will be adhered to (including electrical systems).

2.12 **Raw Materials and water**

The set-up of plant and equipment will minimise the consumption of raw materials and water at the site.

2.13 **Security**

This is an area of vital concern to our business, not only in relation to the value of the materials in store, but also in relation to the protection of the environment and human health.

All visitors will be required to report to the site office and sign the visitor's book.

All fencing, gates and other security measures will be inspected on a regular basis and maintained in sound condition to prevent unauthorised access.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 15 of 28
Authorised by	O Latham	Issue date	Jan 2022

3 EMISSION CONTROL AND MONITORING

3.1 Point Source & Ambient Emissions

Point source emissions from the installation are highlighted in Appendix 2.

Point source emissions to air.

Point source emissions to air will be monitored in accordance with a 'Point Source Emissions to Air Monitoring Protocol' as agreed in writing with the Environment Agency.

Point source emissions to sewer

Point source emissions to sewer are consented by Severn Trent Water under Trade Effluent Consent reference 008667V. The discharge will be monitored in accordance with a 'Point Source Emissions to Sewer Protocol' as agreed in writing with the Environment Agency.

Ambient Emissions to air

Ambient Emissions to air will be monitored in accordance with an 'Ambient Emissions Monitoring Protocol' as agreed in writing with the Environment Agency.

3.2 Odour

The site will not pose a risk of odour related impact due to the nature of the waste and activities carried out. Nevertheless, during daily inspections the presence of any offensive odours will be noted and recorded in the Site Diary. The source of any problem will be investigated and dealt with as necessary to remove the problem. Any complaints received will be recorded in the Site Diary and actioned where appropriate. Additionally, an Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan has been carried out and includes the assessment of odour. This Risk Assessment and Management Plan forms an integral part of the site's Environment Management System.

3.3 Noise and Vibration

Activities on site will be managed to minimise the risk of noise related impact. Nevertheless, during daily routine inspections the presence of nuisance noise (e.g. an explosion or a complaint regarding a noise) will be noted and recorded in the Site Diary/ explosion log. The source of any problem will be investigated and dealt with as necessary to remove the problem. Any complaints received will be recorded in the Site Diary and actioned where appropriate.

Vibration will be assessed via routine site inspections. Site operatives and maintenance employees will be experienced and know what constitutes normal operation in respect of vibrations. Any vibrations identified to be abnormal would be investigated without delay and the necessary plant and machinery maintenance undertaken to resolve the source of the vibration.

Additionally, an Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan has been carried out and will be maintained. This will include the assessment of Noise and Vibration. This Risk Assessment and Management Plan will form an integral part of the site's Environment Management System.

In summary, specific noise management controls include:

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 16 of 28
Authorised by	O Latham	Issue date	Jan 2022

Procedure for the control and monitoring of noise

In General: Sims are aware that the nature of our operations, and the types of waste dealt with will have noise potential. There are two types of potential noise incidents that can occur, general ambient or activity noise and sudden / event noise from unplanned occurrences.

The following procedure will ensure emissions of noise are kept to a practical minimum, preventing or where that is not practicable, minimising the likelihood of noise pollution outside the site.

The measures taken to control noise levels at the facility and to minimise the effect of any such noise outside the site will be as follows:

- The site will routinely operate between 07:00hrs to 17:00hrs Monday to Friday and 07:00hrs to 12:00hrs Saturday. Best endeavors will be taken to operate within these normal working hours, however there may be occasions when operations may be required outside of these hours. The extent of operational hours will not exceed those specified in section 2.7.
- Sims will undertake proactive education of suppliers to prevent or where that is not practicable, to minimise the presence of non-conforming wastes likely to be the cause of sudden noise events.
- Sims will control and monitor waste acceptance procedures to ensure so far as is reasonably practicable, that wastes likely to cause sudden noise events are identified before the treatment process, logged and repatriated to the supplier/ quarantined pending repatriation to owner where applicable/ removal to suitably authorised facility.
- Sims will maintain procedures for logging, monitoring and responding to sudden noise events where they do occur and for informing suppliers which will prevent or where that is not practicable minimise potential for recurrence.
- Sims will undertake proactive and responsive communications with third party hauliers/ site users which include information about times for deliveries and collections and requests consideration of the neighbours when accessing and egressing the site.
- In line with company policy the facility will operate a 'stockpile management plan' which takes into consideration planning restrictions, health and safety legislation and procedures and environmental permitting, drawing attention to the risk of falling material. This facilitates the effective management of the scrap material and unnecessary handling/ double handling of scrap is avoided wherever practicable.
- Drop heights, the distance between the grab and the stockpile "the drop" (deliveries and products) will be kept to the practical minimum in line with company best practice (i.e. grab lowers material onto stockpiles or into containers).
- All plant will be to 'industrial standard' as used in the materials handling sectors, and will be inspected and maintained to manufacturers specification.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 17 of 28
Authorised by	O Latham	Issue date	Jan 2022

- 360 Material Handlers and Site Fork Lift Trucks (FLT's) will be fitted with white noise reversing alarms to eliminate any noise associated with conventional safety alert systems.
- Revving of plant and vehicle engines will be kept to an operational minimum and idling plant will be switched off when not in use where practicable.
- Noise awareness signs will be visible at site weighbridge and in site plant/ machinery.
- Site operatives will be trained in these operating techniques and they will be available in the weighbridge & offices to all Sims employees for reference.
- All relevant Sims Metal Management employees and relevant contractors will be aware of the details of the procedure for noise management and control.
- Tool Box Talks will be used to communicate the policies & plans and will be a record of training.
- All employees will have comprehensive training in respect of the use of the plant and machinery associated with the loading and handling activities.
- Noise will be controlled through the on-going monitoring of site operations by the site management team using the management system tools.

Daily site observations will be conducted by site management and verbal reminders of best practice provided at the time if operational procedures are not in accordance with best practice. Observations with regard to improvements made to the working environment will be recorded in the Site Diary.

Operational Feedback will be communicated to site staff at morning meetings or regular SHEC meetings if earlier notice or discussion is not required.

- Sims contact details will be readily available to neighbouring residents. Neighbours will be encouraged to contact site directly to discuss any concerns they may have.
- The site office contact details (postal address and telephone number) will be available on the site identification board at the site entrance, the Sims company website, yellow pages and business listing services, and internet search engines.
- Any complaints received direct to site or via the Environment Agency will be recorded in the 'Site Diary' and complaints log and responded to expeditiously.
- Significant changes to operational practices will be subject to discussions and to investigation to assess their potential impact on the noise environment. Operational changes are defined as a significant change to plant type, a change to storage/treatment location of waste or a significant change to waste handling procedure.

3.4 Dust

Activities on site will be managed to minimise the risk of dust related impact. During daily inspections the presence of any nuisance dusts will be noted and recorded in the Site Diary. The source of any problem will be investigated and dealt with as necessary to

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 18 of 28
Authorised by	O Latham	Issue date	Jan 2022

remove the problem. Any complaints received will be recorded in the Site Diary and actioned where appropriate. Additionally, an Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan will be carried out and will be maintained. This will include the assessment of dust. This Risk Assessment and Management Plan will form an integral part of the site's Environment Management System.

The following procedure will ensure emissions of dust are kept to a practical minimum, preventing or where that is not practicable, minimising the likelihood of dust emissions from site.

The measures taken to control dust at the facility will be as follows:

- The site management team will carry out monitoring of site operations and undertake regular visual inspections (at least once per day) of operations to check that routine dust management practices are being adhered to and to assess the potential for dust emissions. Remedial action will be taken if dust/particulates are identified as a potential problem.
- Where appropriate and reasonably practicable, the parts of the mechanical Shredder Treatment process with the potential to give rise to dusts will be fitted with dust suppressing technology.
- Shredder Plant/ Stack Emissions - The shredder plant has a cyclone system consisting of dust suppression and a series of wet 'scrubbers'. Heavy fraction falls to the bottom of cyclone 1, lighter fraction to cyclone 2, which, following treatment through the dust suppression system and wet 'scrubbers' drops to a bay (D1 which benefits from dust suppression via fixed sprays). Maintenance will be carried out on the wet scrubber and cyclone systems daily to ensure effective operation.
- D1, D2 and D3 are shredder residue/ waste storage areas. These bays will be on impermeable surface with sealed drainage system and will be enclosed on 3 sides to prevent or where that is not practicable, minimise the potential for windblown emissions. Bays D2 and D3 will have micro-mesh netting installed along the back of the bay under the trommel and ECS to further reduce the potential for dust emissions. The bay dimensions are as follows:

Bay	Width	Depth	Height
D1	6.4m	12m	5m
D2	12.5m	10m	5m
D3	11.5m	10m	5m

- Dust suppressing technology by means of fixed spray systems will be available in D1, D2 and D3 bays and also the transfer conveyor.
- A review of conveyor systems has taken place to ensure that the potential for emissions from those parts of the process will be prevented or minimised so far as is reasonably practicable. The first part of No. 1 Transfer Conveyor will be reviewed as a priority for dust control by covering/enclosure to minimise emissions.
- A review of the sizing trommel, ECS and drum magnet configuration will be undertaken to ensure that the potential for emissions from those parts of the process will be prevented or minimised so far as is reasonably practicable.

- Protective side panels/covers will be installed on exposed parts of the plant if required, to emissions to minimise the potential for emissions in windy conditions.
- Dust suppressing equipment by means of a fixed spray system will be installed and available at the container loading area.
- A portable water hose will be available to suppress dust in areas not covered by fixed spray systems.
- Drop heights the distance between the grab and the stockpile “the drop” (deliveries and products) will be kept to a minimum in line with company best practice (i.e. grab lowers material onto stockpiles or into containers) to prevent the generation of fugitive emissions of dusts.
- The wastes and process residues will be adequately stored and treated in a manner so as to prevent the potential release of dusts and particulates. Storage and containment may include managed stockpiles, bays, bins, skips, containers, stillages, sacks or drums.
- Stockpile management will ensure the capacity of shredder residue bays D1, D2 & D3 will be maintained and the protection afforded by the bay to minimise potential for windblown emissions will not be compromised. As detailed above, shredder residue bays will be surfaced with impermeable pavement with sealed drainage.
- Stockpile management protocol will ensure the height of stockpiles will be managed to a practicable minimum to minimise potential for windblown emissions.
- All treatment activities will take place on impermeable surface with sealed drainage system, minimising the risk of generation of dusts from site surfacing. The integrity of the surfacing will be maintained.
- Good housekeeping will be employed daily to reduce quantities of particulates and dust accumulating on the site. This will occur throughout the operation as required and may also be undertaken as part of the routine maintenance activity.
- Manual sweeping will be employed on plant and equipment to minimise build-up of dust and debris.
- Dust suppression techniques such as dampening and the use of both manual and mechanical sweeping will be employed as necessary to prevent unacceptable emissions. A hose or IBC/bowsers of water will be available to suppress dust on site surfacing and roadways. The mechanical sweeper attachment will be used at least daily and recorded in the Site Diary. During dry weather spells it is likely that the frequency of use of both dampening equipment and the sweeper will increase. Visual monitoring by the site manager or appointed representative in their absence will be undertaken throughout the day to determine the frequency such equipment should be utilised.
- Distances that material has to travel will be kept to a minimum with due care and consideration being given to unloading and loading areas and distance from storage area.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 20 of 28
Authorised by	O Latham	Issue date	Jan 2022

- Traffic speed including vehicles and mobile plant will be limited to 5mph to minimise dust generation by vehicle movement on site. Visible signage informing of the speed limit will be displayed on site.
- Where appropriate (e.g. shredder residues) vehicles will be sheeted to minimise the risk of windblown emissions during transport.
- All relevant Sims Metal Management employees and relevant contractors will be aware of the details of the procedure for dust management and control.
- Tool Box Talks will be used to communicate the policies & plans and will be a record of training.
- All employees will have comprehensive training in respect of the use of the plant and machinery associated with the loading and handling activities.
- Dust will be controlled through the on-going monitoring of site operations by the site management team using the management system tools.

Daily site observations will be conducted by site management and verbal reminders of best practice provided at the time if operational procedures are not in accordance with best practice. Observations with regard to improvements made to the working environment will be recorded in the Site Diary.

Operational Feedback will be communicated to site operatives at morning meetings or regular SHEC meetings if earlier notice or discussion is not required.

- Sims contact details will be readily available to neighbouring residents. Neighbours will be encouraged to contact site directly to discuss any concerns they may have.
- The site office contact details (postal address and telephone number) will be available on the site identification board at the site entrance, the Sims company website, yellow pages and business listing services, and internet search engines.
- Any complaints received direct to site or via the Environment Agency will be recorded in the 'Site Diary' and complaints log and responded to expeditiously.
- Significant changes to operational practices will be subject to discussions and to investigation to assess their potential emissions and the potential impact on the environment. Operational changes are defined as a significant change to plant type, a change to storage/treatment location of waste or a significant change to waste handling procedure.

3.5 Litter

The nature of wastes dealt with will minimise the risk of litter related problems. Nevertheless, any escape of litter beyond the boundary of the site will be cleared up as soon as it is practicable and safe to do so. Any complaints received will be recorded in the Site Diary and actioned where appropriate. Additionally, an Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan will be carried out and include the assessment of litter. This Risk Assessment and Management Plan will form an integral part of the site's Environment Management System.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 21 of 28
Authorised by	O Latham	Issue date	Jan 2022

3.6 Pests

Wastes handled do not attract vermin. Contractor will be used to control vermin and records of actions kept. Additionally, an Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan will be carried out and include the assessment of pests. This Risk Assessment and Management Plan will form an integral part of the site's Environment Management System.

3.7 Fires on Site

Site personnel will be trained in the site's Emergency Contingency Plan. Firefighting equipment will be readily available and maintained as per legal requirements. The Environment Agency will be informed without delay should a fire occur. Additionally, an Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan will be carried out and include the assessment of fire. This Risk Assessment and Management Plan will form an integral part of the site's Environment Management System.

3.8 Control of Mud & Debris

It will be uncommon for the operations to give rise to problems associated with the tracking of mud and debris out onto the public highway. Wastes usually will arrive secure in metal-sided lorries, and the treated products and residues will be dispatched in a similar manner. Nevertheless, any escape beyond the boundary of the site will be cleared up as soon as it is practicable and safe to do so. Any complaints received will be recorded in the Site Diary and actioned where appropriate. Additionally, an Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan will be carried out and include the assessment of Mud and Debris. This Risk Assessment and Management Plan will form an integral part of the site's Environment Management System.

4 MANAGEMENT

Sims Group UK Ltd has an ISO 14001 accredited Environmental Management System which covers the Rabone Lane Facility.

The management system will include standard operating procedures that minimise the environmental risks and impacts of the normal operations and include contingency plans to minimise the effect of breakdown, accidents etc. These will include procedures relating to waste acceptance and environmental monitoring.

A planned programme of maintenance for all plant and equipment will be specified in the management system. All plant will be inspected and maintained in line with the manufacturer's instructions or other appropriate regime.

Sims Group UK Limited will have a training and development programme designed to ensure that staff are suitably trained to undertake their duties. The roles and responsibilities of employees on site will be clearly defined and training records for each employee will be maintained and reviewed regularly to ensure competence is maintained and up to date.

Training and development will be both practical and theory. All employees will receive an induction, training in the form of training presentations, internal work instructions and Tool Box Talks (TBT) for example and practical on the job training, as applicable to their roles and responsibilities.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 22 of 28
Authorised by	O Latham	Issue date	Jan 2022

Key employees have completed relevant competence assessment & Continuing Competence Assessment (Wamitab) as applicable. Such employees are available on site for at least the minimum period or as otherwise agreed with the Environment agency, to ensure that operations are undertaken in line with Sims Policy and Processes.

Plant operatives will have comprehensive training in respect of the use of the plant and machinery associated with the loading, handling and treatment activities, and be subject to periodic external assessment.

A training matrix will be maintained.

Responsibility for some aspects of compliance are managed via Sims Central Functions as detailed below. Where this is the case, training records will be held by each Central Function.

- Central Planning - Waste transport
- Exports - Waste Export
- Commercial (purchasing) - waste supply
- Commercial (sales) - waste dispatch

The effectiveness of training is monitored regularly via site inspection / observations, Safety Conversations, Job Cycle Checks and performance reviews.

The site will be appropriately manned to ensure that the site operates with due regard to the prevention of environmental pollution and harm to human health and ensure that the licence requirements are fulfilled. Sufficient personnel on site will include a weighbridge operator, operational personnel including banksman, plant and machinery operators, supervisors and or site management, maintenance operatives as required and drivers. All contractors visiting the site will receive an induction to ensure that they are aware of the scope of their work, the accident management/emergency procedures for the site and any other management systems appropriate to their role.

Sims Group UK Limited will have an Emergency Contingency and Accident Management Plan that together with the other Environmental Management System documentation such as Operational Techniques for the site, Environment Risk Assessment and Stockpile Management and Fire Prevention Protocol, will meet the requirements of the Environment Agency Guidance.

Sims Group UK Limited will have a Hazard Reporting Policy. The objective of this policy is to reduce the likelihood of future accidents, injuries and damages by reporting and acting upon all Near Misses and Hazards. The Management Team will ensure 'Hazrep pads' are readily available to all employees and will be placed in easily accessible locations. All employees will be trained in the Hazard reporting process.

In the event of an incident, details will be recorded and a full review undertaken. This review will include the following:

- Cause of the incident;
- Effectiveness of management technique
- Effectiveness of Emergency Contingency Plan and Procedures; and
- Recommendations for management technique and/or emergency procedure to reduce risk of future incidents.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 23 of 28
Authorised by	O Latham	Issue date	Jan 2022

5 **SITE RECORDS**

The operator will ensure the following information is recorded:

- Site inspections by the operator or other body and any subsequent issues and corrective actions taken;
- Construction Work;
- Emergencies;
- Fire;
- Complaints and actions taken;
- Plant/equipment failure;
- A record of any rejection of waste;
- Technically competent manager – times on site;
- Security failures;
- Severe weather conditions.

All records will be held in the site office and will be available on request. All records, which are required under the conditions of the Environmental Permit, shall be maintained and kept secure from loss, damage or deterioration. Any records held electronically will be backed up on a regular basis.

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 24 of 28
Authorised by	O Latham	Issue date	Jan 2022

APPENDIX 1

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 25 of 28
Authorised by	O Latham	Issue date	Jan 2022

APPENDIX 2

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 26 of 28
Authorised by	O Latham	Issue date	Jan 2022

APPENDIX 3

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 27 of 28
Authorised by	O Latham	Issue date	Jan 2022

APPENDIX 4

Reference	Sims Group UK Limited_Rabone Lane_Operating Techniques	Page number	Page 28 of 28
Authorised by	O Latham	Issue date	Jan 2022