European Metal Recycling

Environmental Management Plan

EMR Smethwick Depot Version 3 - November 2024

Contents

Document History

Version	Date	Author	Description
1	12/2029		Working Plan
2	08/2023	N Gray	Update
3	10/2024	N Gray	Update to EMP

Introduction

The following Environmental Management Plan (EMP - formerly known as a Working Plan) has been produced by European Metal Recycling hereafter referred to as (EMR) to support the Environmental Permit for EMR Smethwick, Downing Street, Smethwick, Birmingham, B66 2PG, operated as a Metal Recycling Site (MRS) submitted to the Environment Agency hereafter referred to as (EA). The content of this EMP and the assessments contained within have been produced based on the requirements as set out in the EA guidance documents: 'How to comply with your Environmental Permit' guidance and specification document 2010 (formerly Working Plan Guidance).

The site consists of an area, covering approximately 3.14 hectares the grid reference for the centre of the main site is SQ 03123 89283

The permitted area is shown outlined in green in the environmental permit and attached as Appendix

The site operates under 2 environmental permits. The shear yard permit is EPR/AB3503F and the baler yard permit is EPR/ LP3597FX as well as a this authorizes the keeping and treating of scrap metal and waste.

The company's registered office is:

European Metal Recycling Limited
Sirius House
Delta Crescent
Westbrook
Warrington WA5 7NS

Registered in England and Wales No. 2954623

Section 1 – Site Description and Characterisation of Risk Source

1.1 Location of Site/Community/Sensitivity

The EMR site is located at Downing Street, Smethwick, Birmingham, B66 2PG The site which falls within 2 districts: Birmingham and Sandwell as indicated on the site plan in Appendix 1.

The depot is divided into two yards, the Shear yard (Access of Downing Street via Charles Street) and the Baler yard, accessed of Downing Street

The national grid reference for the centre of the main site is SQ 03123 89283. Access to the yard is by entrances on Downing Street (via Charles Street). The main access route to Downing Street is via A41 from (M5 Junction 1). Junction 1 is approximately 1.2 m North West off the yard. A site location plan has been included.

The site is located within an industrial area and bordered by other industries and railroad. There is a primary school 1 km to the West of the yard and a housing estate to the rear of the yard adjacent to the rail track (within 1km) .

The nearest airport is Birmingham International and is within 21 miles of the yard to the South.

1.2 Specified Site and Waste Management Operations

Activity	Description	Limits
Shear Yard		
R3 Recycling / reclamation of metals and metal compounds	Cars, other vehicles trailers, non ferrous metal scrap, ferrous metal scrap, mixed scrap and tyres	All processing of wastes shall be undertaken on an impermeable pavement served by a sealed drainage system.
R4 Recycling/reclamation of metals and metal compounds		
R13 Storage of waste prior to activities RS		
Baler Yard		
R4 Recycling/reclamation of metals and compounds		
R13 Storage of waste prior to activities RS		All storage of wastes shall be undertaken on an impermeable pavement served by a sealed drainage system

1.3 Permitted Wastes

The activity on site is the treatment of controlled waste for the purpose of recycling.

The site will accept plastic frames under LRWP41 . This material will be stored separately in either a metal bay or within a sealed metal skip. A maximum of 40 Tonnes can be stored at any one time. This material will not be treated on site. Once a full load is available, it will be despatched to an approved facility for recycling.

Annual Tonnages of all materials	
Waste Type	Maximum Permitted Quantity (Tonnes/Year)
Shear Yard	
Metal Scrap Including ELV's	74,999
Baler Yard	
Metals	75,000

.Tale 1.2 – EWC Codes for wastes that may be accepted at the site

Wastes highlighted blue are stored on site following depollution of vehicles but would be received on site as part of those vehicles.

Chapter From European Waste Catalogue that codes have been selected	**Sub-section**	**Code**
02 – Wastes from Agriculture, Horticulture, Aquiculture, Forestry, Hunting and Fishing, Food Preparation and Processing	02 01 Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing	02 01 10 waste metal
12 – Wastes from Shaping and Physical and Mechanical Surface Treatment of Metals and Plastics	12 01 wastes from shaping and physical and mechanical surface treatment of metals and plastics	12 01 01 ferrous metal filings and turnings
		12 01 02 ferrous metal dust and particles
		12 01 03 non-ferrous metal filings and turnings
		12 01 04 non-ferrous metal dust and particles

Chapter From European Waste Catalogue that codes have been selected	Sub-section	Code
15 Waste Packaging; Absorbents, Wiping Cloths, Filter Materials and Protective Clothing not otherwise specified	15 01 packaging (including separately collected municipal packaging waste)	15 01 04 metallic packaging
16 Wastes not otherwise specified in the list	16 01 end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)	16 01 03 end-of-life tyres
		16 01 04* end-of-life vehicles (M)
		16 01 06 end-of-life vehicles, containing neither liquids nor other hazardous components
		16 01 07* oil filters (A)
		16 01 08* components containing mercury (M)
		16 01 09* components containing PCB's (M)
		16 01 10* explosive components (for example air bags) (A)
		16 01 11* brake pads containing asbestos (M)
		16 01 12 brake pads other than those mentioned in 16 01 11
		16 01 13* brake fluids (A)
		16 01 14* antifreeze fluids containing dangerous substances (M)
		16 01 15 antifreeze fluids other than those mentioned in 16 01 14
		16 01 16 tanks for liquefied gas
		16 01 17 ferrous metal
		16 01 18 non-ferrous metal

Chapter From European Waste Catalogue that codes have been selected	Sub-section	Code
		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
		16 01 22 Components not otherwise specified.
	16 02 Wastes from electrical and electronic equipment	16 02 11* discarded equipment containing chlorofluorocarbons, HCFC, HFC
		16 02 15* hazardous components removed from discarded equipment (includes WEEE derived cable)
		16 02 16 Components removed from discarded equipment other than those mentioned in 16 02 15*
	16 06 batteries and accumulators	16 06 01* lead batteries (A)
17 Construction and Demolition Wastes (including excavated soil from contaminated sites	17 04 metals (including their alloys)	17 04 01 copper, bronze, brass
		17 04 02 aluminium
		17 04 03 lead
		17 04 04 zinc
		17 04 05 iron and steel
		17 04 06 tin
		17 04 07 mixed metals
		17 04 10* cables containing oil, coal tar and other dangerous substances (M)
		17 04 11 cables other than those mentioned in 17 04 10
19 Wastes from Waste Management Facilities, Off-	19 01 wastes from incineration or pyrolysis of waste	19 01 02 ferrous materials removed from bottom ash

Chapter From European Waste Catalogue that codes have been selected	Sub-section	Code
site Waste Water Treatment Plants and the Preparation of Water Intended for Human Consumption and Water for Industrial Use		
	19 10 wastes from shredding of metal-containing waste	19 10 01 iron and steel waste
		19 10 02 non-ferrous waste
		19 10 04 fluff-light fraction and dust other than those mentioned in 19 10 03
	19 12 wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	19 12 02 ferrous metal
		19 12 03 non-ferrous metal
20 Municipal Wastes (Household waste and similar commercial, industrial and institutional wastes) Including separately collected fractions	20 01 separately collected fractions (except 15 01)	20 01 23* discarded equipment containing chlorofluorocarbons
		20 01 35* discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (M)
		20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
		20 01 40 metals

1.4 Site Plan

Refer to Appendix 1 – Site Plan (Permit site plan). A plan of the sensitive receptors is included in the appendices and a table of them is attached.

1.5 Hours of Operation

Scrap metal and associated wastes shall be received, handled, deposited or processed only during the following days and times:

Day	Opening hours
Monday to Friday	6:00am - 10.00pm

Saturdays (maintenance only)	6.00am - 6.00pm
Sundays and Public Holidays	7.00am - 4.00pm

The site is required to open on Bank Holidays, ours being a service industry and having to satisfy the requirements of Local Authorities and our many works contracts.

1.6 Environment Permit

The Environmental Permit will be displayed in a prominent place (e.g. notice board) and replaced by a new copy if they go missing or are defaced in anyway. Operational staff will be made aware of permit requirements by site management staff.

The Depot Manager (normally Technically Competent person) and other key staff / supervisors will be familiar with the Environmental Permit and its requirements.

1.7 Staff Competency and Training

The site will be staffed by person (s) who are Technically Competent and have undergone technical competency (TCM) training or a technically competent person shall be available for the site. Certain relevant key staff (e.g. depot manager) will also undergo CoTC /WAMITAB / NVQ training (or equivalent) or be scheduled to attend the relevant course.

The Environment Agency will be informed if there is a change in the Technically Competent Manager (TCM) for the site.

All other staff will receive training suitable for their roles. Other updates will be provided via toolbox talks and/or huddles.

Section 2 – Site Infrastructure

2.1 Provision of Site Identification Board

A site identification board will be provided at the site entrance detailing the following information:

- Site Name & Address
- Environmental Permit Holder Details
- Operators Details
- EMR Emergency Out of Hours Contact Numbers
- Opening Times
- Environmental Permit (Waste Management Licence) No.
- Environment Agency Contact Numbers

In the event that the board is damaged or information on it needs to be updated a new board will be ordered and fitted within one month of the company being notified that it is damaged or within one month of any changes of information.

2.2 Site Security

The boundaries are comprised of galvanised coated palisade fencing, concrete planking, brick wall and Braithwaite panels. The external gates are constructed of steel, hollow section and are padlocked when the site is closed. The protective enclosure is maintained by EMR's internal maintenance program. The site benefits from a 24hr CCTV camera system which is remotely monitored outside of operating hours.

The site will be kept closed and secure at all times when unattended. The security measures detailed will be inspected at commencement of each working day. Any defects shall be made secure by temporary repair by the end of that working day and shall be fully repaired within seven working days of the damage being identified.

All defects, damage and repairs will be recorded on site.

2.3 Lighting

The site will be provided with adequate lighting which will be utilised during times of poor visibility arising either due to adverse weather or seasonal changes in daylight hours.

The lighting will be inspected at commencement of each working day. Any defects shall be fully repaired within seven working days of the damage being identified.

All defects, damage and repairs will be recorded on site.

Section 3 – Site Engineering and Controls for Pollution Prevention and Control

3.1 Engineered site containment and drainage systems (includes effluent collection systems)

3.1.1 Impermeable Site Surfaces

The yard benefits from concrete throughout.

3.1.2 Sealed Drainage Systems

Concreted areas of the site(s) are laid in such a manner as to direct potentially contaminated surface waters to silt traps installed within the concrete. These, in turn, drain to a full retention interceptor fitted with a penstock valve before being discharged to foul sewer. To close the drainage the penstock is turned to the closed position. Oil collected in the interceptor is removed on a periodic basis by an authorised waste contractor.

The drainage system is inspected on a monthly basis to ensure that it remains in good working condition, impervious and free from cracks. The results of the inspections are recorded. Any action required to be taken will be recorded. Repairs to lids and covers will be undertaken as soon as practicable and within 10 working days of discovery..

Engines are stored in a roro area, a sleeping policeman bund has been installed to contain any residual oil from the engines and the oil in the area is removed as necessary

Severn Trent Authority Reference D 0152010945

3.1.3 Bunded Areas

All tanks are identified on the site plan and a chemical inventory is listed in the emergency paln

Tanks and bunds are inspected weekly and following heavy rainfall to ensure their continued integrity. Any defects observed will be mad temporarily secure by the end of the working day with permanent repairs being instigated as soon as is practical.

3.1.4 Maintenance Schedules

Surfaces and the drainage system will be inspected on a monthly basis. During low stocking periods, the opportunity will be taken to inspect surfaces normally inaccessible due to stockpiles. Should damage to the pavement be observed, a timescale for repair will be agreed.

The drainage system, including silt traps, drain covers and interceptor will be inspected monthly. The interceptors on the shear yard shall be fully inspected annually and an integrity report shall be submitted to the Environment Agency. All contaminated wastewater shall be disposed of by an authorised contractor and the Duty of Care documentation shall be filed on site.

Any operational mobile plant and fixed equipment will be located on an impermeable pavement. All mechanical equipment used on site for handling waste shall be maintained and inspected by a competent person and records of inspections and maintenance schedules shall be retained on site.

The sealed sump on the shear yard will be inspected daily and this will be documented. An annual integrity report will be submitted to the Environment Agency.

SECTION 4 - Site Operations

4.1 Waste acceptance and control systems & procedures

4.1.1 Waste Acceptance

Vehicles arriving at either site must enter the shear yard gates, pass through a radiation detector and proceed in a one-way system onto the weighbridge located immediately inside the main entrance. At this point, the load is checked visually for its suitability for processing at the site and checked against the description of the load provided on the waste transfer note/weighbridge ticket. In the event that unacceptable wastes are discovered at this point, the vehicle shall be rejected from site. Rejections will be documented on the event log.

If the materials are determined as acceptable by this initial inspection, the vehicle is directed to a suitable area to discharge its load vehicles being directed either to the baler yard or the shear yard as required. Within each yard the tipping areas may vary depending upon various factors such as stocking levels and health and

safety. Once the load is tipped, the materials are again inspected by the off-load inspector to determine whether any unacceptable materials are present. Should unacceptable materials be observed at this point, contrary items are returned to the vehicle and rejected from site. The vehicle driver and customer are notified of the reasons for the rejection. Radio communications are maintained between weighbridge and yard inspectors during the acceptance of waste at the site.

Once a load has been tipped, inspected and deemed as acceptable, the vehicle is cleared to return to the shear yard weighbridge where the weight of the material tipped is determined

4.1.2 Waste Rejection Procedure

In the event that non-conforming materials are detected after these two inspections, these are segregated on discovery and quarantined in a suitable manner. An assessment will be made of the properties of the waste, and if necessary specialist advice obtained regarding handling and disposal

4.1.3 Hazardous Wastes

The shear yard processes certain types of hazardous waste items, most notably certain types of ELVs and residual wastes arising from the depollution process. Procedures for dealing with hazardous items are found in the EMS. All hazardous waste consignments should accompanied by a completed hazardous waste note, which is checked against the load.

4.1.4 Wastes Containing Liquids

Liquids and other hazardous components shall be drained or removed from End of Life Vehicles (ELVs) in accordance with the End of life Vehicle Regulations as detailed in EMR Environmental Protection Procedure (EPP 1.5). All storage and treatment of un-depolluted ELVs shall take place on an impervious surface served by a sealed drainage system.

The site will not accept tanks or drums unless they have been confirmed as having been purged of their contents through provision of a purge certificate or via suitable inspection points being provided.

4.1.5 Pressurised Containers

Gas cylinders and pressurised containers are not knowingly accepted at the site. Should such items be discovered during the inspection stages, they will be rejected from site. Should these be discovered later among material waiting processing, or export then they will be segregated and placed in a designated appropriately signed container/compound prior to collection or decommission by an appropriately authorised contractor.

Records of the collection of gas cylinders shall be retained in the site diary or the site's environmental files.

4.2 Waste Sampling and Testing

The site's waste acceptance criteria do not routinely require wastes accepted to be subject to sampling or testing. If the site does accept any materials that may be classified as hazardous,

then the site will require that appropriate documentation detailing the relevant hazardous properties and safe storage and handling requirement is provided.

4.3 Waste Quantity Measurement Systems

Records will be maintained for all wastes accepted to the site and exported from the site. Waste quantities will normally be recorded via the sites weighbridge or other mechanical scales in smaller acceptance areas such as the non-ferrous trading area. However in instances when the weighbridges may not be functioning due to events such as power cuts, weight estimations may also be provided based on the calculation of tonnage verses volume for loads that cannot be weighed. The site may also rely on volume measurement information for items such as liquids removed from site by contractors when bunds, tanks and interceptors are serviced / cleaned.

The site's weighbridges are calibrated on an annual basis under service contract and more regularly if required when maintenance is undertaken.

Records of all calibration and any Trading Standards inspections will be retained on site, service labels will also be maintained on the equipment for quick visual inspection and confirmation of calibration.

4.4 Storage of Specified Wastes

4.4.1 Batteries

A potential ignition or combustion. These are primarily lead-acid batteries and are removed from ELVs during depollution or received as a specific material at the non-ferrous small scales. Lead acid batteries are stored in acid resistant battery bins and when not in active use to be filled they are kept in a covered battery storage area central to the northern boundary. The battery bins are transferred to the battery storage area once full.

Storage procedures are also detailed in the Environmental Procedures or EPPs (full list shown in Appendix 3).

4.5 Control of Potentially Polluting Leaks and Spillages

4.5.1 Liquid Storage

Liquids shall only be accepted as part of an ELV in the shear yard.

The site does not accept tanks or drums unless it has been confirmed that these have been purged of their contents.

Liquid waste arsing form the depollution of ELV's will be stored in the tank farm and be emptied on regular basis by a competent contractor

.

4.5.2 Procedures for control and remediation of leaks and spillages

Any minor spillage will be cleaned up utilising the spill kit materials maintained on site.

Where a potentially polluting spillage has occurred, immediate action will be taken to prevent the spillage entering surface water drains, watercourses or contaminating unmade ground. The spillage shall be cleaned up immediately using absorbent materials and placed in sealed containers, and the Agency shall be informed where necessary.

4.5.3 Equipment and materials for cleaning up leaks and spillages

Any minor spillage will be cleaned up utilising the spill kit materials maintained on site.

Where a potentially polluting spillage has occurred, immediate action will be taken to prevent the spillage entering surface water drains, watercourses or contaminating unmade ground. The spillage shall be cleaned up immediately using absorbent materials and placed in sealed containers, and the Agency shall be informed where necessary.

Any potentially polluting incident will be recorded on the event log.

4.5.4 Wastes Containing Liquids

Liquid containing wastes which are accepted in accordance with the environmental permit are handled in accordance with EMR Environmental Protection Procedures (EPPs) listed in Appendix 3.

Liquids shall only be accepted as part of an ELV in the shear yard.

The site does not accept tanks or drums unless it has been confirmed that these have been purged of their contents.

4.6 Specified Waste Treatment Processes – Plant, Equipment and Procedures

The specified waste treatment process on site is the shearing an of scrap metal. Once the scrap metal has been accepted and inspected it is fed by crane into the shred for processing and stored in stockpiles on site.

The shredder will process the following types of scrap metal:

- Scrap metal
- Depolluted (complete) end of life vehicles

The waste treatment on the Downing Street site is the baling of aluminium. . Once the scrap metal has been accepted and inspected it is fed by crane into the baler stored in stockpiles on site.

End of Life Vehicles (ELVs)

The secondary specified waste treatment process on site is the depollution of ELVs, which are processed in line with the End of Life Vehicles Regulations. The storage and treatment of ELVs is further detailed in the relevant environmental procedures.

SECTION 5 - Pollution Control, Monitoring and Reporting

5.1 Emissions Monitoring

The general handling of waste material and processed metals on the site is not considered to give rise to emissions of specific gases, vapours or aerosols at such levels or concentrations that there is a measurable risk of pollution of the environment or human health outside of the site boundary. However dust may be generated from general site activities and the appropriate procedures and dust suppression must be used to mitigate against emissions of dust.

If a potential environmental issue is identified linked to emissions of specific gases, vapours or aerosols at such levels or concentrations that could pose a risk of pollution of the environment or human health outside of the site boundary then appropriate steps will be taken by EMR to monitor these emissions and formulate the appropriate actions.

5.2 Groundwater and land monitoring and assessments

The handling of waste material and processed metals on the site is not considered to pose a significant risk or direct linkage to ground waters due to the engineering and operational containment systems that have been put in place on site.

However if a potential environmental issue is identified that may potentially effect the underlying groundwater then appropriate steps may be taken by EMR to monitor ground water under the site were possible.

5.3 Water Monitoring

The handling of waste material and processed metals on the site is not considered to pose a significant risk to surface waters due to the nature of the materials handled on site and the engineering and operational containment systems in place on site.

Drainage systems including gullies, drains, drain covers and interceptors are regularly. Site interceptors are emptied by an authorised contractor in accordance with the manufacturer recommendations, (which states that oil and diesel must be removed when capacity is reached).

All operational plant and fixed equipment are maintained and inspected by a competent person and records of inspections and maintenance schedules retained on site. All inspections, defects, leaks, damage, maintenance and repairs are recorded

The site manager undertakes regular checks of the site's surfaces to ensure that they are maintained in good condition and repairs across the site are anticipated and planned for within the budgetary cycle. Damaged and worn site surfaces are repaired as soon as practicable and operations moved to alternative areas of the site.

To demonstrate a good surface water management system, monitoring will be performed by sampling water before and after interceptor and analyses performed of samples against agreed parameters (conducted in MCERTS, UKAS accredited laboratories) and the permitted discharge consent limits.

5.4 Monitoring of Meteorological Conditions

The site will maintain basic weather data and ongoing records of events. Meteorological and weather conditions will be monitored based on visual observation but also monitoring of weather reports which can be obtained from a number of sources (e.g. Met Office website) and will be relied upon to give an indication of pending storm events, or other events, wind direction etc. that may effect the site's operation.

Weather conditions (temperature, wind speed & direction) will be reported daily in the site diary. Records of any meteorological conditions that may adversely affect the site's operation or neighbouring properties will be recorded and maintained.

5.5 Emergency Plan

An Emergency Plan has been implemented at the site (a separate document) and an emergency drill will be conducted at the site at once a quarter. The plan includes fire, major spillage, pollution incidents, extreme weather, receipt of highly dangerous waste (e.g. asbestos, munitions) etc. The depot manager and key staff will make themselves familiar with the document and this document will be placed in a prominent place (noticeboard etc.).

5.5.1 Climate Change

A climate change risk assessment has been developed for the site. It will be reviewed annually.

In the case of extreme weather causing the site to close, waste can be diverted to another neighbouring EMR Depot.

Waste Type	Neighbouring EMR Depot
Metal Shred/Shearing	Birmingham Landor
ELV's	Birmingham Landor
WEEE	Birmingham Landor

5.6 Notifications

Any site activities or operations that give rise to an incident or an accident which significantly affect or may significantly affect the environment (e.g. a fire or major pollution event) will be reported to the Environment Agency on the EA Emergency line and an incident reference number obtained.

The following incidents will require immediate Notification to the Environment Agency (using the Schedule 5 form attached to the site permit):

- Fire
- Explosions

- Any breakdown, malfunction or equipment failure that has resulted in an emission which has caused significant pollution.
- Any breach of a limit specified within the permit or EMP (Environmental Management Plan)
- Any significant adverse environmental effect

Information and details of the incident will be recorded on a Schedule 5 notification form (attached to the permit), with Part A initially being filled out within 24 hours of the incident, followed by Part B detailing any investigation, mitigation measures and actions taken, as soon as practicable.

All environmental incidents & permit breaches will be recorded on the Event log.

SECTION 6 – Amenity Management and Control

6.1 Control of mud and debris

The site benefits from a substantial impermeable pavement, therefore mud and other debris are unlikely to be tracked onto the road from inside the site. The internal surfaces are swept by mechanical sweeper.

The access road to the site is visually inspected on a regular basis. In the event that mud or debris is observed which is likely to have arisen from the site, then action is taken as soon as possible. The contractor used for mechanical sweeping is available at short notice if required. Attendance of sweeping contractor will be recorded on the event log.

6.2 Fires on Site

In the event of a fire, immediate action will be taken. If it is safe to do so, trained personnel on site will attempt to extinguish the fire and the Emergency Plan for the site will be initiated.

If staff on site are unable to extinguish the fire, the affected areas shall be evacuated and the following actions will be undertaken:

- In the event of a fire that can not be extinguished safely with on-site equipment, the Fire Brigade will be contacted by dialing 999.
- The site manager will evacuate all staff and visitors from potentially hazardous areas and direct them to the nominated fire assembly point and ensure all relevant personnel are present.
- The penstock valves will be shut, interceptor pumps turned off (where relevant).
- The staff at the weighbridge will be informed for the purposes of directing emergency service vehicles.
- The following EMR personnel will be contacted to notify them of the situation:
  - Area Manager
  - SHE Specialist
- Once the fire is under control, the Environment Agency will also be notified by either there main number within office hours or via the Environment Agency Emergency No. 0800 80 70 60. An incident reference will be requested from the EA for future reference.

All fire incidents are recorded in the event log and are subject to an internal investigation.

6.2.1 Fire Prevention Plan (FPP)

Reference Fire Prevention Plan

6.3 Control of Dusts, Fibres and Particulates

Regular inspections are undertaken throughout the working day by the site management and any dust problems identified. Unfavourable weather, such as windy or dry and sunny conditions which may result in closer monitoring of potential sources of dust or complaints received are recorded on site as they occur.

Visual monitoring will take place around the site at times when the risk of dust release is possible and any complaints from neighbours would be investigated immediately. Records will be kept of any complaints and any actions taken.

Site surfaces are cleared and swept at regular intervals to remove dust. During dry, windy conditions likely to produce dust generating conditions the situation is kept continuously under review

In the event that complaints are received relating to dusts on site, details of the potential causes, investigative measures taken and any results will be recorded in the site diary.

6.4 Control of odours

The type of material received and processed at the site is not likely to result in the production of odours. In the event that complaints are received relating to odours on site, the potential cause shall be investigated with details being recorded on the event log.
The types of materials that will be received and processed at the site (scrap metal wastes) are not likely to result in the significant generation of odours. In the event that complaints are received relating to odours on site, the potential cause shall be investigated with details and the results of any investigations recorded in the site diary.

6.5 Control and Monitoring of Environmental Noise/Vibration

The site is located within a heavy industrial area and acoustic concrete planked walling assists in screening the site and retaining some of the ambient noise levels. Ear defenders are supplied to relevant personnel and mobile plant have standard exhaust silencers and are regularly maintained.

Vehicles removing waste from site are sheeted where necessary and inspected prior to leaving the site to ensure that the load is secure.

In order to minimise noise generated from plant, equipment is inspected on a daily basis and is maintained in accordance with manufacturer's specifications.

Operating and waste acceptance hours are restricted in accordance with section 3 of this plan.

Any noise/vibration complaints received will be recorded and investigated, with results being recorded in the site diary.

6.6 Control of Waste (for further treatment or landfill)

For waste destined for recycling or disposal at third party sites, only approved contractors will be used and the appropriate Duty of Care documentation will be completed on transfer of the waste to a permitted facility.

Where required wastes produced on site) will undergo waste acceptance criteria (WAC) testing before onward movement to designated, permitted and approved site.

6.7 Control of Pest Infestations

The site does not knowingly accept waste types that are likely to attract or provide a habitat for vermin.

The site shall be inspected weekly for signs of pests. In the event that vermin are discovered on site, a specialist pest control contractor shall be appointed as soon as possible. The attendance of the contractor along with inspection records will be recorded on the event log

6.8 Control of litter

The site does not knowingly accept waste types that are likely to become airborne and escape from site. The boundaries of the site are inspected on a daily basis and any litter present is collected regularly.

SECTION 7 - Site Records

7.1 Security and availability of records

EMR will maintain site records at the locations specified in section 7.2, Table 4.

The site offices and document storage facilities will be maintained in such a manner as to provide a location that will keep documents secure from loss, damage or deterioration for the statutory periods that they must be retained.

7.2 Records of waste movements

Site records of waste movements shall be maintained through the retention of hard copies of normal weighbridge tickets, hazardous waste consignment notes and transfer notes from servicing contractors removing contaminated liquids, absorbents, waste oils etc. This information will be retained in at the following locations for the following specified time periods:

Table 4 Retention and availability of records

Records	Location	Retention Time Period
Weighbridge tickets	On site	2 years
Incoming hazardous waste consignment notes	On site	3 years
Outgoing consignment notes and transfer notes from servicing contractors removing contaminated liquids, absorbents and waste oils	On site	3 years
Electronic Records	Head Office (Warrington) Server – with national access for any authorised site and user.	Electronic records commenced in 1999 long term retention time scales are yet to be established (anticipated to be a minimum of 10 years).
Records required by Permit	Central database / site	6 years
Off-site environmental effects and matters affecting land and groundwater	Central database / Site	Until Permit surrender

This information will be further maintained in an electronic format by the company's weighbridge and accounting data base, from which waste movement information can be obtained in a number of reporting formats.

7.3 Site Diary

The site diary will be maintained on site and shall be maintained by the site manager or those operatives which the manager delegates its maintenance to. Other similar documents and information recording systems may also be maintained.

The site diary will be kept until permit surrender.

7.4 Periodic Reporting of Environmental Performance

7.4.1 Tonnage Returns

EMR will centrally manage the waste tonnage returns to the Environment Agency detailing its inwards and outwards waste movements by EWC code in an electronic format. Copies of the returns will be retained centrally.

7.4.2 Hazardous Waste Returns

Hazardous waste returns for all hazardous wastes received at the site will be submitted to the Environment Agency by EMR on a quarterly basis by the end of each preceding quarter. EMR will centrally manage the reporting of hazardous waste returns quarterly to the Environment Agency via its Waste Returns Team. Hard copies of the quarterly hazardous waste returns will also be retained in either the company's' central environmental files and / or the site's environmental files.

SECTION 8 - Environmental Management System

In order to reduce the site's environmental impact, an Environmental Management System (EMS) will be implemented to provide the company with a framework through which its environmental performance can be monitored, improved and controlled. The EMS is supported by an electronic SHE software.

The EMS for the site will comprise of an Environment and Energy policy, the Environmental Management Plan (formerly working plan) for the site, environmental risk assessments, Environmental Procedures (EPPs), environmental auditing, Emergency Plan, environmental training and environmental reporting.

At EMR Smethwick, a certified IMS (ISO9001, 14001, 45001 & 50001 standards) has been implemented on site. A certificate is available upon request.

8.1 Environment and Energy Policy

The company's Environment and Energy policy (group wide) will be implemented on site outlining the company's mission and driving force behind the environmental objectives, targets and management programme of EMR.

The policy stating the company's aims and objectives will form the basis for its EMS on site and will be endorsed and actively supported by senior management and accepted by all staff.

It will allow management to communicate its aims and objectives to employees and other interested parties, including shareholders, customers and suppliers and be part of the business strategy.

8.2 Environmental Risk Assessments and Procedures

Planned environmental risk assessments will be conducted at the site to identify significant environmental impacts and risks and these will be translated into procedures as appropriate; environmental protection procedures (EPPS) will be written and appropriate training given to staff in the implementation of these procedures. An Environmental Aspects and Impacts register will be compiled to support ISO14001 EMS requirements.

The core EPPs implemented on site are listed in Appendix 3.

These EPPs will be controlled and supplemented with generation of further EPPs to be implemented and controlled as part of the environmental management system plan or as and when required.

8.3 Environmental Objectives and Targets

As part of the ISO 14001 EMS / IMS requirements, Objectives and Targets (O&Ts) will be formulated and agreed based on required Environmental Improvements for the site (in addition to Quality and Health & Safety improvements).

8.3.1 Energy Efficiency and Efficient Use of Raw Materials and Water

The site will take appropriate steps to:

- Take appropriate measures to ensure that energy, water and raw materials are used efficiently in the site activities
- Review and record whether there are suitable opportunities to improve the efficiencies of activities
- Take any further appropriate measures identified by the review.

To this end electricity, water gas, oil, fuels and raw materials will be measured and recorded for the site and a tally recorded and kept to facilitate any review and any efficiencies and savings that can be made in accordance with ISO 50001.

8.3.2 Avoidance, Recovery and Disposal of Wastes

Any waste generated at the site will be treated in accordance with the waste hierarchy referred to in article 4 of the Waste Framework Directive, minimising the impact on the environment. EMR as a company has a business and environmental target of zero waste to landfill.

This will be facilitated at the Smethwick site by Objectives and Targets produced as part of an ISO14001 Environmental Management System (EMS), which in turn forms part of EMR's wider IMS (Integrated Management System) e.g. the implementation of office waste recycling and recovery.

Waste Hierarchy:

8.4 Environmental Management Training

Environmental training will be provided to all staff as appropriate. The depot manager and key staff will be given formal training on environmental protection procedures (EPPs) and the requirements of the Environmental Permit as appropriate. Other staff will be trained via 'tool box' talks etc. or specific EPPs as appropriate to task.

The depot manager will be technically competent or will undergo the requisite CoTC training or WAMITAB / NVQ training (or equivalent) or be scheduled to attend the relevant course (prior to stipulated deadlines).

8.5 Environmental Auditing

An internal audit programme has been implemented to support the ISO certificate. Sites may also participate in annual (external) surveillance visits conducted by our certification body.

Other checks and inspections will occur on a regular basis and these will be documented on site.

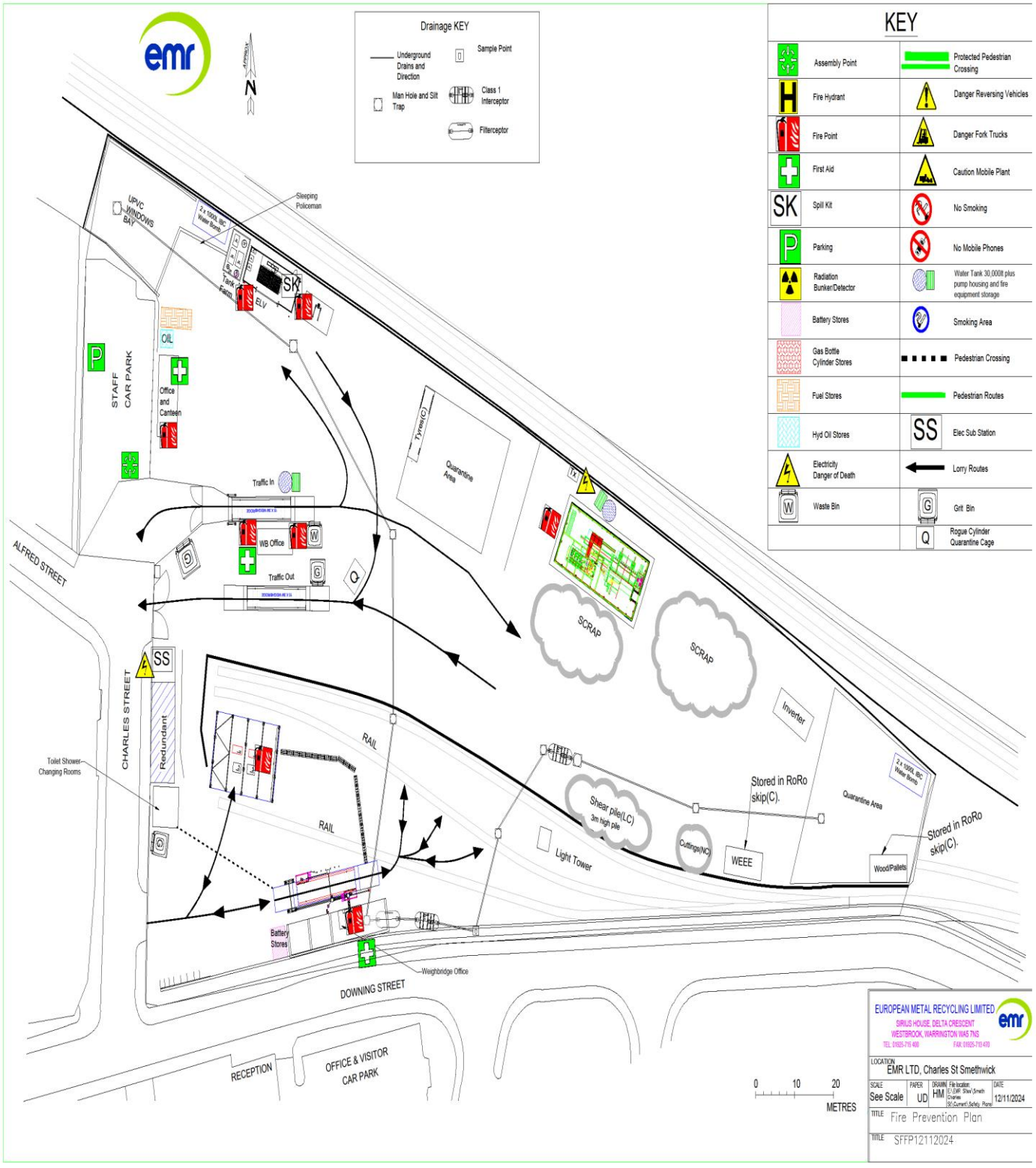
Appendices

Appendix 1 – Site Plan

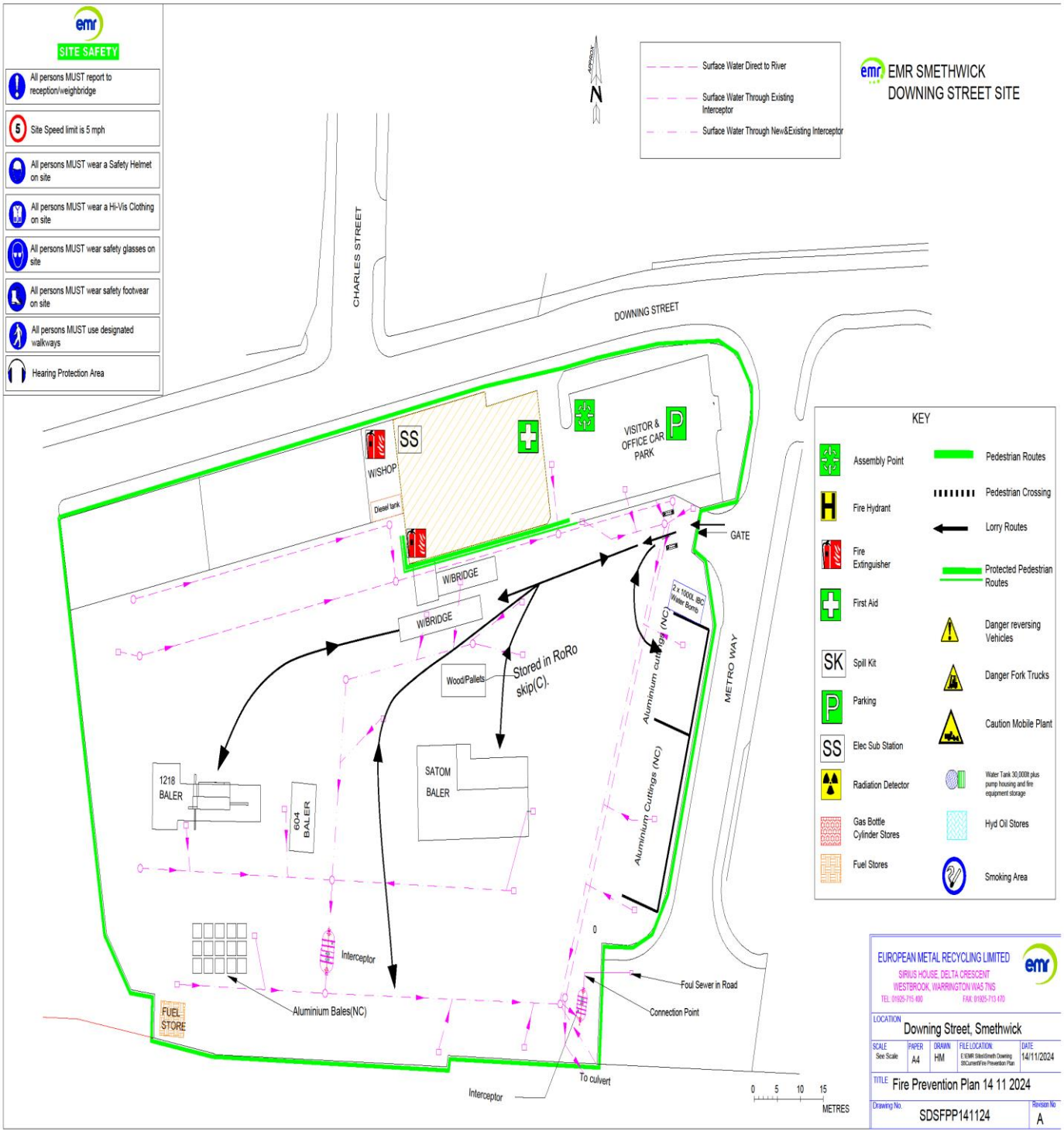
Appendix 2 – Site Layout Plan (including drainage)

Appendix 3 – EPP List

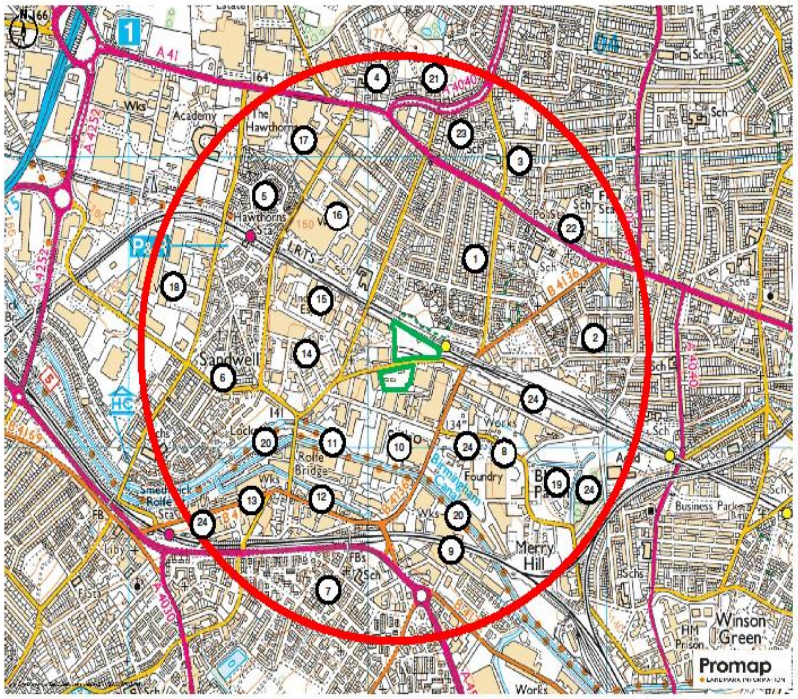
Appendix 1 – Site Drawings



Appendix 1 Site Drawings



EMR Smethwick: Sensitive Receptors within 1 km Plan



Client: European Metal Recycling (EMR Smethwick)
Job Title: Sensitive Receptor Plan
Drawing Title: Sensitive receptors within 1 km plan
Date: November 2024
Version: Version 1
Job Ref: EMR Smethwick Sensitive Site Receptor Plan

19 Key:
Permit boundary
1 km boundary
1 Identified receptors

Scale:
1m 250m

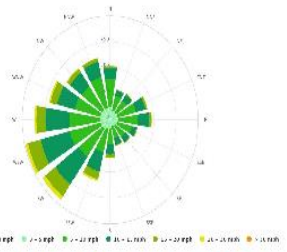


Figure 1: 30 Year Average Wind Rose for Smethwick, Birmingham

Source: www.meteoblue.com (https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/smethwick_united-kingdom_2637607)