



EUROPEAN METAL RECYCLING

SMETHWICK BALER YARD CONSOLIDATION OF PERMIT

NON-TECHNICAL SUMMARY

NOVEMBER 2024

DATE ISSUED: 28th Novemer 2024
JOB NUMBER: ST21386
REPORT NUMBER: RPT 01
VERSION: V0.1
STATUS: Final

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DRAWINGS

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| SMEPB26112024 | EMR Smethwick Permit Application |

1 INTRODUCTION

- 1.1.1 European Metals Recycling Ltd (EMR) are applying to consolidate their permits for Smethwick Baler Yard.
- 1.1.2 Currently their site at Downing Street, Smethwick operates under three different authorisations, a standard rules permit for the area to the south of Downing Street a bespoke environmental permit, which was formerly a waste management licence, for an area to the north of Downing Street (Alfred Street site) and a T9 Exemption.
- 1.1.3 The aim of this variation application is to amalgamate these three authorisations into one bespoke permit ahead of changes to the exemptions that are due next year. The site also accepts non WEEE and WEEE derived cable, as it has done for many years. However, the recent research showing that much of this waste is hazardous has also prompted EMR to include additional waste codes for hazardous cable, so that they can continue to accept this waste. Three new waste codes will be added for ferrous and non-ferrous metal particles and fluff.

2 THE APPLICATION

- 2.1.1 This application includes:
- Two sets of completed application forms, A, B2 B4 and F1,
 - This Non-Technical Summary,
 - A plan showing the new permitted area,
 - Environmental Management Plan, setting out the day to day operation of the site,
 - A summary of EMR's ISO14001 accredited Environmental Management System,
 - An Environmental Risk Assessment
 - A Dust Management Plan
 - A Fire Prevention Plan
 - A Site Condition Report
- 2.1.2 A set of application forms has been completed for each of the two permits, in line with the Environment Agency's guidance for the part C 2 form, which says,

"If you have several permits on one site and you want to consolidate (combine) them into one permit, list the relevant permit numbers

here in Table 2. You will need to apply to vary each of the permits you want to consolidate or combine.”

- 2.1.3 The other documents apply to both applications.
- 2.1.4 The variation is solely about consolidating and updating the permit for the site, to ensure clarity and enable full legal compliance as the legislation and guidance is updated. The type and quantity of waste and the site activities will be those that are already undertaken, with just two new waste codes which are in line with the other wastes already accepted on site. A consolidated list of waste codes is included in the Environmental Management Plan.
- 2.1.5 Because there is no real change in the site operation, there will be no change to the risk posed to the environment and no H1 has been completed for emissions to sewer. Discharges will be exactly as before the variation and are controlled by a discharge consent from Severn Trent Water. In the same way no Noise Assessment has been completed because the operations are already authorised. However, we have provided an updated Fire Prevention Plan and Dust Management Plan to give a clear unified approach for the whole site.
- 2.1.6 A Site Condition Report has been included because there is a triangle of land forming part of the overall site but which is not covered by either permit at present. This area of land is to the north of Downing Street and to the south of the Alfred Road Site and currently operations in that area would be covered by the T9 exemption. The new site boundary plan is provided as drawing SMEPB26112024.

3 CHANGES TO THE PERMIT

- 3.1.1 Permit EPR/LP3597FX was first issued in June 1996 and continues to be written in the old style of waste management licences at the time. Permit EPR/AB3503FJ is a standard rules permit utilising SR2008 No.21.
- 3.1.2 The aim is to have one new permit in the Environment Agency’s modern style.
- 3.1.3 Five new waste types will be added to the permit, not because the operations have changed but to take account of changes in the way waste is classified since the permits were issued and allow the site to accept metal particles. It is also noted that although the site can accept both hazardous and non-hazardous WEEE this is restricted to white goods under the current conditions. EMR are seeking to remove this restriction so that small WEEE can also be accepted.

4 ENVIRONMENTAL PROTECTION

- 4.1.1 Each area of the site is provided with concrete surfacing to ensure that there are no emissions to groundwater and to prevent formation of mud. The concrete is designed to drain to a sealed drainage system with water passing through an interceptor before entering the foul sewer in Downing Street.
- 4.1.2 Waste will be accepted during the day and will be stored in limited stockpiles to minimise fire risk. Waste acceptance procedures are in place to ensure that only metal wastes are accepted and prevent odorous or litter forming materials entering the site.
- 4.1.3 Batteries will be kept in suitable containers and with lids or undercover. This will also apply to hazardous cable and to metal particles or fluff. Suitable bunded containers will be provided for any oils, antifreeze etc removed from end of life vehicles.
- 4.1.4 The site will be operated in accordance with EMR's ISO14001 accredited management system and will be supervised by the existing technically competent manager. Daily inspections of the site will be made to ensure that it is kept tidy and that there are no unacceptable emissions. Further detail is provided in the Environmental Management Plan.
- 4.1.5 A Dust Management Plan and Fire Prevention Plan are in place for the site.

DRAWINGS

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