EMR Oldbury

Working Plan
Advanced Automotive Shredder Residue Recycling Facility

Environmental Permit EPR/TP3938ZN

Version 5: September 2024

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CONTENTS

1.0 INTRODUCTORY COMMENTS

1.1 Introduction

This document provides an introduction to the operations and processes at the Oldbury site and forms part of the written management system for the site. EMR have created a management system to comply with the requirements of ISO14001 and 50001. See Environmental Management Files.

1.2 EMR Oldbury

EMR, will process approximately 416,000 tonnes of Automotive Shredder Residue (ASR) per annum, initially transported to the facility by road, from shredders around the country. Metals, aggregates and plastics will be separated from the refined ASR and sent off-site for further reprocessing and recovery. The remaining combustible waste (including foam, wood and plastic) will be retained on site for disposal at third party facilities.

The Advanced Automotive Shredder Residue Recycling Facility operations are authorised under Permit Reference EPR/TP3938ZN.A copy of the Environmental

1.3 Management System

This working plan forms part of the written management system for the site, as required by condition 1.1.1 of the Environmental Permit. Condition 1.1.1 states:

'The operator shall manage and operate the activities:

In accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints.'

This working plan and related documents have been prepared in accordance with the relevant Environment Agency permitting guidance, and in particular the Environmental Management Tool Kit for the metal recycling industry and How to Comply with your Environmental Permit.

EMR have created a management system to comply with the requirements of ISO14001 and 500001. EMR's environmental information is available in series of folders.

1.4 Emergency Management Plan

A separate Accident Management Plan has been provided as part of the management system, to cover incidents with the potential to adversely effect the environment.

Planned Preventive Maintenance is carried out as following EMR's Group Health and Safety Policy Section 3.40 Mobile Plant and Section 3.06 Construction Installation, Modification and Maintenance safety management.

1.5 Site Location and Layout

The development is located adjacent to the Anglo-African Industrial Estate on Union Road in Oldbury, North West of Birmingham. The entire development occupied by IES and EMR is roughly triangular in shape measuring approximately 8.7 hectares. The area occupied by EMR, and to which this permit application relates, forms the Western portion of the development. The EMR site has an approximate area of 6 hectares and the national survey grid reference for the centre of the site is SO 98291 90887.

The extent of the EMR permit is shown by the green line area on the location plan (ref. EMR/OLD/S01) and on the site layout plan (MA8605/1000)

1.6 Site History

Historical land uses include a colliery and oil storage depot/above ground storage tanks. More detail can be found in the site condition report on file.

1.7 Underlying Geology

Geological records (British Geological Survey Map 1:50,000 sheet 168) indicate that the site is underlain by made ground that overlies the Etruria Marl Formation, comprising mudstone, that is part of the Upper Coal Measures. This overlies the Middle Coal Measures (productive measures). More detail can be found in the site condition report on file.

1.8 Hydrogeology and Groundwater Vulnerability

According to the Environment Agency Website, 'What's in your backyard', the Coal Measures underlying the site are classified as a Secondary A aquifer. However, as the Etruria Marl Formation comprises mudstone it is more likely to be characteristic of Unproductive strata. The underlying middle coal measures would be considered a Secondary A aquifer, displaying variable permeability. Secondary A aquifers can be fractured or potentially fractured rocks which do not have a high primary permeability but are important for local supplies and in supplying base flow to rivers. The site is not located in a source protection zone (SPZ).

Groundwater Vulnerability: The soils in this area are classified as having a high leaching potential. Soils of high leaching potential readily transmit liquid discharges because they are either shallow, or susceptible to rapid by-pass flow directly to rock, gravel or groundwater. Previous investigations have identified that the fill materials

contain perched groundwater that appears to be flowing towards the River Tame.

1.9 Site Infrastructure and Plant

The site is provided with an impermeable concrete surface and sealed drainage system, and all waste storage and processing will be undertaken within buildings. The EMR building is provided with a rainwater harvesting system and lagoon, which provides EMR with the option to use rainwater instead of town water for its processing. The site also has a storm water pond.

Clean roof water from the EMR building drains to the rainwater harvesting lagoon, for re-use in the EMR facility. Rainwater from outside the EMR building drains to Storm Water Pond 2, after passing through a by-pass separator/interceptor.

1.10 Size of Operation

The permit allows the processing of up to 416,000 tonnes per annum of automotive shredder residue (ASR). This includes 406,000 tonnes of hazardous waste and 10,000 non-hazardous waste.

1.11 Typical Wastes Received

The EMR ASR recycling facility will accept the following wastes:

19	WASTES FROM WASTE MANAGEMENT FACILITIES…
19 01	**wastes from incineration or pyrolysis of wastes**
19 01 12	bottom ash and slag other than those mentioned in 19 01 11
19 10	**wastes from the shredding of metal-containing wastes**
19 10 03*	fluff-light fraction and dust containing hazardous substances
19 10 04	fluff light fraction and dust other than those mentioned in 19 10 03
19 10 05*	other fractions containing hazardous substances

1.12 Typical Processes on Site

ASR is sorted and separated to recover target (non-POPs) plastics, aggregates and metals through a series of equipment.

Hazardous and non-hazardous will be stored and treated separately in batches. In between batches the plant will be run clear and bays will be cleared to avoid contamination.

1.13 Risk Assessment

Site-specific environment risk assessments are provided in the management system folder.

1.14 Guidance Documents

Relevant guidance, including the Environment Agency document, ‘How to comply with your Environmental Permit’ is provided in the management system and stored electronically to help the site operate in accordance with the Permit and relevant environmental standards.

2.0 SITE DESCRIPTION AND CHARACTERISATION OF RISK SOURCE

2.1 Location of Specified Waste Management Operations on Site

Information with regards the location of site operations is summarised on the site plans provided in the EMS.

2.2 Permitted Wastes

The light and heavy Automotive Shredder Residue (ASR) fractions will initially be delivered by EMR Ltd lorries weighed in at the EMR Oldbury site and stored prior to being processed. The consistency of the material will eliminate the need for regular analysis of the material, as recommended by the Environment Agency's S5.06 document, although storage of the ASR prior to processing will allow regular visual inspections of the material by site management.

In accordance with the Environmental Permit and the Waste Regulations, the site will keep records of all wastes received at the site for processing.

2.3 Accepted Wastes (in accordance with the European Waste Catalogue)

The EMR ASR recycling facility will accept wastes listed in section 1 of this document.

2.4 Materials Storage

The site is provided with an impermeable concrete surface and sealed drainage system, and most waste storage and processing will be undertaken within buildings.

The following storage operations are authorised by the Environmental Permit:

R13 Storage of waste prior to recycling/reclamation (including schedule 1, section 5.4, Part A(1), b, (ii) and section 5.4, Part A(1),b,(iii) and Section 5.3 Part A(1) (a)

The storage of ASR and pyrolysis residue prior to processing through the EMR ASR recycling plant, and the storage of different components of the ASR throughout the treatment process.

D15 Storage of waste prior to disposal (including schedule 1, section 5.1, Part A(1), c

The residue at the end of the process may be landfilled.

Section 5.6 Part 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.

2.5 Materials Treatment

Metals, aggregates and target plastics will be separated from the refined ASR and sent off-site for further reprocessing and recovery. The remaining combustible waste (including foam, wood and non target plastic) will be retained temporarily on site before it is sent off site for disposal or recycling.

2.6 Maximum Capacity of Operation

The EMR ASR recycling facility will process approximately 416,000 tonnes of ASR per annum, and through a combination of the grading sorting and segregation processes described earlier in this document, will provide an estimated 191,000 tonnes of re-useable material, such as metals, plastics and aggregate, that will either be sold or sent off site for further re-processing.

Wastes is currently accepted on site by road and will be logged on our IT systems. Products and wastes, following processing, will be recorded.

2.7 Site Opening Hours

The light and heavy Automotive Shredder Residue (ASR) fractions will be delivered by lorry.

The site is a 24 hour operation however there will be restrictions on lorry movements before 6am and after 6pm

The opening hours, together with the permit number and contact details of the operator and regulator are displayed on the site ID board located at the site entrance.

2.8 Site Operational Hours

The site is open to ASR at 6 am and stops accepting ASR at 18.00 but is permitted to carry on processing on a 24 hour basis.

3.0 SITE ENGINEERING FOR POLLUTION PREVENTION AND CONTROL

Information regarding the site's pollution prevention and control measures is included within the Environmental Management System folder.

3.1 Impermeable Pavement & Sealed Drainage Systems

The site is provided with an impermeable concrete surface and sealed drainage system, and all waste storage and processing will be undertaken within buildings.

The site is provided with a rainwater harvesting lagoon, which provides the EMR facility with the majority of its processing water, and a storm water pond.

Clean roof water from the EMR building drains to the rainwater harvesting lagoon, for re-use in the EMR facility. Rainwater from the outside areas of the EMR site drains to Storm Water Pond 2, after passing through a by-pass separator/interceptor. The storm water pond discharges to the River Tame.

Layout & Construction

Information on the layout and construction of impermeable paving and the sealed drainage system, including location of the interceptors and the tanks are included within the Management System folder.

3.2 Technical Specifications of Materials & Construction

The site is fully concreted, providing an impermeable paved surface. The concrete is of a high specification as it was laid for the purpose of heavy industrial use. The paving is laid to falls draining to interceptors.

3.3 Maintenance Schedules

The integrity of the impermeable paving is inspected on a regular basis. Areas prone to particularly heavy wear, may be monitored more frequently.

A record of infrastructure inspections, and any remedial actions taken as a result of these inspections, will be made electronically. Any areas that are unable to be inspected during a particular inspection will also be noted on the inspection form. The drainage system will be checked regularly on a regular basis to ensure it is operating efficiently. The falls and gullies will be visually inspected to ensure they are not blocked.

The interceptors will be inspected monthly by lifting manhole covers and checking the levels of accumulated oils within the system. The outflow will be inspected to ensure oil carry-through is not occurring. The built-in control measures will be checked, including the penstock valve.

Where necessary, the interceptors will be emptied by EMR's approved contractor. Oily waters from interceptors are currently classified as Hazardous Waste without analysis, and would therefore be removed off site by a licensed contractor with the appropriate paperwork (Hazardous Waste Consignment Note).

3.4 Covered Buildings or Roofed Areas

All of the processes occur within the building, covered areas of the site include the weighbridge office building, mess room, maintenance store, main office building, warehouses and amenity block/laboratory.

3.5 Above Ground Fixed Tanks

Although information and guidance in this section refer to liquid wastes, it is also intended to use this working plan section to deal with non-waste liquids such as fuels and process waters stored.

All bulk liquids are stored with a means of containment to limit the impact of any potential spills. Diesel for site plant is stored in a bunded bulk storage tank, the location of which is indicated on the site plan.

The bund has the capacity to contain 110% of the maximum volume of a leak or spillage at all times. This equates to 110% of the maximum volume of the tank within the bunded area.

The bund walls and floor are impervious to the contents of the tank they enclose. The bunds do not have vents or drains within them.

All pipework, valves and vents are located within the bunded area, and are directed into the bund when not in use. All tanks or bulk liquid containers are labelled to indicate their contents and maximum storage capacity.

Spill kits, specific for the liquids stored within the bund, are provided and maintained. Site staff are trained in the use of the spill kits.

All fixed storage tanks and their associated bunds will be inspected on a regular basis. These inspections, together with any damage noted and remediation action taken, will be recorded electronically on an inspection form.

3.6 Maintenance of Tanks and Bunds

The condition of the tanks and bunds will be checked on a regular basis, and any defects noticed and repairs carried out will be recorded on the action log. All repairs necessary to ensure impermeability of the bund will be carried out as soon as practicably possible.

4.0 SITE INFRASTRUCTURE

4.1 Description of Site Security

Site security is of high priority on metal recycling sites because of the inherent value of many of the materials and plant stored on site.

The EMR site is a 24 hour manned operation. The EMR site is secured by fencing.

The site is protected by an alarm and a CCTV system which is monitored. Specific information is not provided here for security reasons.

The perimeter of the site is inspected on a routine basis. Any damage will be logged, and defects shall be made secure by temporary repair by the end of the working day and shall be repaired within seven working days of the damage being detected.

The action log will be used to record any damage to the fencing and gates, and any subsequent repairs.

5.0 SITE OPERATIONS

5.1 Control of Leaks & Spillages on Site

A leak or spillage may not be polluting in itself but may lead to pollution if not properly controlled and remedied. Minor or insignificant leaks or spills would be covered by routine site procedures and general house keeping. The procedures for dealing with significant spillages are included in the Emergency Plan.

The bulk storage tank for plant diesel is integrally bunded.

Spillages or leaks of liquids may also be contained and controlled by the use of suitable absorbent materials, such as those arising from the fuelling of plant. The spent absorbent will then be collected and packaged for removal from site as hazardous waste.

Procedures and information on handling significant spillages are contained within the Emergency Management Plan, which is provided within the management system folder.

5.2 Fire Control & Elimination Procedures

No fires will be allowed on site. Provision for dealing with a major accidental site fire is included in the Emergency Management Plan.

The stockpiling of waste materials will be in accordance with the requirements of the Environmental Permit.

Clearance will be maintained around material stockpiles for access.

A further emergency vehicular clearance will be maintained between any stockpile of materials and any fixed plant, building, site boundary, compressed flammable gas or any substance with a flash point below 66ºC.

Site staff are trained in the location of fire extinguishers and other fire fighting equipment. They have been instructed in the identification and containment of fires using the equipment provided. Where it is considered necessary, the Site Manager will call the Fire Brigade to extinguish the fire.

Residues arising from a fire will be assessed for processing. Materials without sufficient metallic fraction will be exported from site as waste for disposal. Materials with an economic metal content will be processed to extract the metals.

All significant fires will be reported to the Environment Agency immediately once the fire has been extinguished and it is safe to do so. As a minimum, this will be in the form of an emergency fax sent to the Environment Agency. The fire will be recorded in the site diary.

5.3 Fires to which the Fire Brigade are Called

The Site Manager will assess the situation on site and site staff will attempt to contain the fire if appropriate. If it is decided the Fire Brigade is needed, then the site office will make the required call. The site procedure will then be acted upon to deal with the situation in accordance with the Emergency Plan.

5.4 Waste Reception

ASR is received at the site delivered by lorry. The materials are weighed on the site weighbridge and a weighbridge ticket/duty of care waste transfer note is produced. Radiation detectors are present on the weighbridge.

The weighbridge ticket complies with the requirements of Waste Regulations 2011. The date, time, vehicle registration no., name of supplier, waste carriers registration number, description (including European Waste Catalogue code) and weight of materials will be recorded.

5.5 Waste Inspection

The light and heavy ASR fractions will be delivered by lorries and weighed in at the EMR Oldbury site and stored prior to being processed. The consistency of the material will eliminate the need for regular analysis of the material, as recommended by the Environment Agency's S5.06 document, although storage of the ASR prior to processing will allow regular visual inspections of the material by site management.

Similarly, the pyrolysis residue returned from IES to EMR for further processing will not require regular analysis, but will be stored prior to processing, which will allow visual inspections to be made.

In accordance with the Environmental Permit and the Waste Regulations, the site will keep records of all wastes received at the site for processing.

5.6 Waste Acceptance

The EMR ASR recycling facility will accept 3 waste streams. Two of the waste streams relate to outputs from shredders namely the light and heavy ASR fractions. The pyrolysis residue which is returned from the IES plant, plus three waste streams from the mechanical treatment of waste.

Waste acceptance procedures EPP 1.1 and 1.2 will be followed. Loads will be inspected via the CCTV camera and EMR's radiation detectors. EMR's material acceptance and inspection procedures will be in operation. Material will be tipped in an area away from the scrap pile to ensure it does not mix with material already accepted on site and visually inspected.

The third waste stream relates to the pyrolysis residue returned from IES to EMR Ltd for further processing. Again, due to the consistent nature of the infeed to the gasification/pyrolysis process, regular analysis of the material will not be required.

The pyrolysis residue (non-hazardous) is stored and processed in a separate area of the site (A700) and will therefore be kept completely separate from the hazardous wastes processed through the remaining parts of the plant.

Vehicles to the Oldbury Site will be directed to the correct tipping/unloading area and the material tipped into the reception hall within the building.

5.7 Quarantine Storage & Rejection of Wastes

The incoming wastes are the light and heavy shredder residue streams, waste from the mechanical treatment of waste and the pyrolysis residue fed back onto the EMR site from the IES pyrolysis plant. Inspection of the waste is undertaken at the weighbridge and during the unloading loading of the vehicles

Waste rejection procedure is followed if material is found to be unacceptable. The driver will be informed of the reasons for the rejection and a waste rejection form completed and note made in the site diary. Waste will be rejected from the site or isolated to the designated quarantine area and removed from site to a suitable facility as soon as practicable.

The pyrolysis residue is similarly very consistent in nature, controlled by the pyrolysis process and fed back to the EMR site by conveyor. The nature of the pyrolysis process will ensure that the need to quarantine any of this material would not arise.

There will be a designated area for materials that cannot be processed such as oversize materials. They will be returned to the site they originated from.

5.8 Site Attendance and Operator Competence

The site will be adequately manned whenever waste handling operations are being carried out. EMR will ensure a minimum of one competent operator, as certified by WAMITAB, is present on site for at least the minimum length of time specified by Environment Agency guidance.

The relevant WAMITAB certificates are provided in the management system folder.

5.9 Lighting

Adequate lighting is provided to enable visual inspection of loads after dark.

5.10 Inspection of Loads for Dispatch

Outgoing loads from the site will relate to the following:

- Metal grades generated by the metal recycling processes for onward processing/recycling
- Materials, such as plastics, organics and aggregates generated by the metal recycling processes for onward processing/recycling
- Waste oil from site plant
- Waste oil/water from the site's interceptors
- Any other wastes generated by site infrastructure works
- Oversized materials that cannot be processed.

The type of waste (description and EWC code), weight and other details required to satisfy the requirements of the Waste Regulations 2011 are completed on the transfer note.

5.11 Waste Dispatch & Recording

Wastes are dispatched from site by either company vehicles or by approved hauliers. EMR is a registered waste carrier/dealer (registration reference CB ZE 5607 KJ). Wastes dispatched from site will be recorded and records held for a minimum period of 6 years, in accordance with the Environmental Permit.

A copy of the consignment note for each hazardous waste dispatched, such as, waste oil from plant, or oily water from the interceptors, will be retained on site for a minimum period of 6 years as required by the Environmental Permit.

5.12 Segregation of Incompatible Wastes

Typically the types of wastes handled by the site will not be reactive and therefore unable to cause this type of hazard.

5.13 Analysis of Incoming Wastes

Chemical analysis of ASR entering the site will not be required as a routine. A visual inspection is typically adequate for the purpose of checking waste inputs.

Where conformation checks are required, i.e. to identify if suspect materials contain asbestos, samples would be taken and submitted for analysis, unless accompanied by qualifying certificates. This analysis would be taken prior to the waste being accepted on site.

A sufficiently accredited laboratory (e.g. UKAS, MCERTs) will be commissioned to undertake the required analysis, and the results will be interpreted independently in line with the site requirements.

5.14 Analysis of Outgoing Wastes

For the purpose of the Duty of Care, analysis of wastes exported from site may be required. Waste oils, including oily water from interceptors, are currently classed, without analysis, to be Hazardous Waste and are carried and disposed of accordingly.

A sufficiently experienced company will be commissioned to undertake the correct preparation and analysis for the particular test to be undertaken, and the results will be interpreted independently in line with the site requirements.

5.15 General Analysis

Materials discovered on site which are suspected to be prohibited wastes will be either; assumed to be prohibited and therefore segregated for removal off site for disposal, or analysed to confirm their composition and accordingly handled and removed from site for disposal.

5.16 Weighbridge

As waste management sites pay for their receipts of waste by weight, they are typically fitted with weighbridges. There are two weighbridges and a 3rd on the site which are all designated for trade.

The weight is recorded and printed on the weighbridge ticket dispatched with the load.

Overweight loads detected leaving site are to be returned and unloaded down to the correct weight before dispatch.

The precision and accuracy of a weighbridge is a matter for Weight and Measure Regulations enforced by HM Revenue and Customs and Trading Standards and is beyond the requirements of Waste Management Legislation. Under this regime the weighbridge must be precise and accurate at the time of testing.

5.17 Waste Oils

Waste oils, although not specifically received by EMR, will accumulate over time, such as from the maintenance of site plant. Any containers of waste oil will be contained in such a way as to prevent leaks or spillages, and the storage and disposal of waste oils will be carried out in accordance with the Environment Agency guidance.

5.18 Asbestos

The site does not receive asbestos containing waste. Any asbestos concealed within loads will be subject to the rejection and quarantine procedures detailed in section 5.7, and the procedures provided in the Emergency Plan.

6.0 POLLUTION CONTROL, MONITORING AND REPORTING SYSTEMS

6.1 Groundwater

We are not aware of any other metal recycling companies in the area or in the UK who are currently required to install boreholes for groundwater monitoring.

Geological, hydrogeological and groundwater vulnerability information is included in sections 1.6 to 1.7 of the Working Plan and the relevant geological maps are provided in the management system folder.

6.2 Surface Waters

The site is bound on 2 sides by surface water features. To the north the Birmingham Canal is located. To the south-west the Gower Branch Canal, branching off from the Birmingham Canal, borders the site for a short distance. The River Tame then passes under the Gower Branch Canal and borders the site for the rest of the south-western boundary. The River Tame flows in a south-east to north-west direction.

The river quality of both the Gower Branch Canal and the River Tame in close proximity to the site has been classified as D (Fair) by the Environment Agency. The river quality of the Birmingham Canal within close proximity to the site has been classified as E (Poor).The site is provided with a rainwater harvesting lagoon, which provides the EMR facility with the majority of its processing water, and a storm water pond.

Clean roof water from the EMR building drains to the rainwater harvesting lagoon, for re-use in the EMR facility. Rainwater from the outside areas of the EMR site drains to Storm Water Pond 2, after passing through a by-pass separator/interceptor. The storm water pond discharges to the River Tame.

Locations of the rainwater harvesting lagoon and storm water pond and details of the by-pass separator are shown on the attached plan (IESO_SK_VCUK(PT)_130521_01 Rev 01). The separator will have a local Aquasentry 060 separator alarm, which when triggered, will light the relevant LED on the unit and activate a siren.

7.0 AMENITY MANAGEMENT AND MONITORING

7.1 Dust Nuisance

Filters will be located throughout the EMR building for local extraction at material transfer points. The locations of the filters are shown on the site plan (ref. 7148-SK-235), and the flow rates provided in the table below.

Filter Specification	Filter Duty (m^3/hr)	General Location
FT101	15,000	ASR Processing Area
FT102	25,000	ASR Processing Area
FT103	30,000	ASR Processing Area
FT301	15,000	ASR Processing Area
FT401	15,000	ASR Processing Area
FT701	5,000	Pyrolysis Residue Processing Area
FT702	25,000	Pyrolysis Residue Processing Area
Total	**130,000**	

- **Table 1: Air Filter Flow Rates**

The worse case emission concentration for each filter is 10mg/m^3. However, the emission rate is likely to be 5mg/m^3 or lower, as the filters tend to 'bed in' over time.

The composition of the emissions will depend upon the composition of the material in the vicinity of the filter. Although EMR has analysis of both the ASR and pyrolysis residue that will be processed at the facility, estimating the composition of the material captured at each of the filter points is difficult. Many of the processes within the building are further enclosed, and some of the processes are damp, thus significantly reducing the dust reaching the filters. In addition, metals and other materials are removed at stages throughout the process, significantly altering the composition of the material between filter locations. The Oldbury development represents new technology, therefore there are no similar facilities which can be used as a comparison with respect to the composition of air emissions.

Monitoring at each of the seven emission points will be carried out during the commissioning stage of the plant. For the reasons discussed above, it is proposed that the nature and frequency of air emission monitoring are discussed with the Environment Agency at the end of the commissioning period, once the composition and emission rates have been confirmed. In dry weather, the wetting of roadways and access routes will be carried out by a road sweeper, together with the sweeping of exposed parts of the site where necessary.

7.1 Control of Dust, Fibres & Particulates

Many of the processes within the building are further enclosed, and some of the processes are damp, thus significantly reducing the dust reaching the filters and the local environment. Refer to EPP 4.4 regarding mud and dust control.

7.2 Monitoring of Dust, Fibres & Particulates

Monitoring at each of the seven emission points will be carried out during the commissioning stage of the plant. For the reasons discussed above, it is proposed that the nature and frequency of air emission monitoring are discussed with the Environment Agency at the end of the commissioning period, once the composition and emission rates have been confirmed. In dry weather, the wetting of roadways and access routes will be carried out by a road sweeper, together with the sweeping of exposed parts of the site where necessary.

7.3 Odours and Fumes

The site does not handle putrescible wastes or those which may develop significant odours.

7.4 Noise

The site was constructed as per the Noise and Vibration Management Plan required by planning. All waste processes and associated plant are within a fully cladded building. Internal noise levels are controlled by careful plant selection, layout, enclosure of noisier plant and internal partition walls. No mobile plant is to be operated outside of the building. All vehicles have non-tonal reversing alarms. The loading doors are closed at night.

7.5 Pests

The materials handled on the site are unlikely to attract pests. If pests or evidence of pests are observed in the future, a local pest control company would be employed to place traps and poisons on the site and to monitor the situation.

7.6 Litter

Litter is unlikely to become a problem on the site. The site is fenced on all sides for security reasons, and litter that may arise will be retained within the site boundaries.

Regular site inspections will be carried out to check for accumulation of litter and debris across the site, and where necessary, a litter pick would be undertaken or a road sweeper employed.

7.7 Invasive Species

Himalayan Balsam

 Credit Invasive Weeds Agency

Himalayan Balsam is an annual herb, native to the Himalayan region of Asia. This plant has covered much of Britain spreading particularly rapidly along riverbanks. The flowers appear in July with seeds that start to scatter by October not only around the plant, but also onto water.

Once established it competes effectively against native plants and suffocates vegetation.

It is required to be controlled under The Wildlife and Countryside Act 1981 (Variation of Schedule 9) (England and Wales) Order 2010 (SI 2010 No. 609).

The site is inspected on a routine basis and the plant will be identified as part of this inspection. The plant is controlled by cutting back in spring preventing flowering and therefore any seed distribution.

8.0 SITE RECORDS

8.1 Storage of Site Records

Records relating to the reception and dispatch of waste, in accordance with the Waste Regulations, are held at the Oldbury site, for inspection at any time.

Records will be kept for a minimum period of 6 years, in accordance with the Environmental Permit, and will include the origin of the waste, time and date received; types and quantity received, time and date removed, types and quantity removed, and the destination of the waste removed.

Records relating to off-site environmental effects and matters which affect the condition of land and groundwater will be kept until surrender of the Environmental Permit.

8.2 Submission of Records to the Environment Agency

A summary of the waste types and quantities received at the Oldbury site and the pollution inventory is submitted to the Environment Agency in a format and at the frequency required by the Agency.