

European Metal Recycling Ltd.

Variation of Environmental Permit EPR/TP3938ZN Non-Technical Summary & Supporting Information

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1 INTRODUCTION

1.1 Background

European Metal Recycling (EMR) operates an advanced recycling facility at Union Road, Oldbury, which processes up to 416,000 tonnes per annum of Automotive Shredder Residue (ASR). Metals, aggregates and plastics are separated from the ASR and sent off site for further processing and recovery.

The activities are authorised by the Environment Agency (EA) under Environmental Permit ref. EPR/TP3938ZN, which classifies the site as an installation due to the inclusion of the following IED paragraph:

5.4 A(1)(b) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day, involving ii) pre-treatment of waste for incineration or co-incineration; iii) treatment of slags and ashes.

Due to the recent reclassification of ASR [metal shredder residue] and publication of the Environment Agency's Regulatory Position Statement (RPS) Storing and physically treating hazardous metal shredder residues: RPS 274, EMR has applied to vary the permit to add the List of Waste (LoW) codes for hazardous ASR, the relevant Schedule 1 paragraph for treating hazardous waste, and the relevant Schedule 1 paragraph for the temporary storage of hazardous waste with a total capacity exceeding 50 tonnes at any one time.

All other operational details remain the same as provided in the original application and authorised by the current permit, and have therefore not been provided again with this application. This includes the Fire Prevention Plan and environmental risk assessments.

The operations remain subject to the same BREF document (2018/1147), and are therefore already compliant with, and regulated against, the appropriate BAT. A re-assessment of the BAT as part of the application has therefore not been undertaken.

The relevant operator competence (WAMITAB) certificates have been provided due to a change in competence operator since the original application, and a copy of the relevant ISO14001 certificate, due to the recent inclusion of EMR Oldbury under this scheme.

1.2 Scope of Document

This Non-Technical Summary (NTS) provides supporting information relevant to the application to vary Permit EPR/TP3938ZN, including a description of the required changes to the permit.

Following variation of the permit, the operations will be subject to the following technical standards and guidance:

- EU 2018/1147 Waste treatment BREF
- Storing and physically treating hazardous metal shredder residues: RPS 274

2 ADDITIONS TO THE PERMIT

2.1 Addition of Schedule 1 Activities: Hazardous Waste Treatment

In order to authorise the processing and storage of hazardous ASR, EMR has applied for the following paragraphs from Schedule 1 of the EPR to be added to the Permit.

- Section 5.3 Part A(1) (a) 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
- 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.

2.2 List of Waste (LoW) Codes

In accordance with RPS 274, the following LoW codes are required for the Section 5.3 activity, to authorise hazardous ASR, and for the Section 5.6 activity, temporary storage of hazardous waste.

- 19 10 03* fluff-light fraction and dust containing hazardous substances
- 19 10 05* other fractions containing hazardous substances

2.3 Annex IIA and IIB Recycling/Disposal Codes

The following Recycling and Disposal Codes taken from the Waste Framework Directive Annex I and II apply to the new activities:

Physico-chemical treatment of hazardous waste (>10 tonnes per day)

- R13 storage of waste pending any of the operations numbered R1 to R12, excluding temporary storage, pending collection, on the site where the waste is produced
- D15 storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
- 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

Temporary storage of hazardous waste (>50 tonnes)

- R13 storage of waste pending any of the operations numbered R1 to R12, excluding temporary storage, pending collection, on the site where the waste is produced
- D15 storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

2.4 Directly Associated Activities (DAAs): Hazardous Waste Treatment

The DAA for the processing of hazardous waste will be the same as one of the DAAs currently on the permit in relation to the Section 5.4 activity, namely:

Directly Associated Activity			
A3	Water treatment plant	Treatment of dirty water	Treatment by physico-chemical processes for recirculation within the plant

3 OTHER CHANGES TO THE PERMIT

3.1 Pre-Operational Measures

The permit currently lists a series of pre-operational measures (table S1.3A) and pre-operational measures for future development (table S1.3B) which no longer apply (due to being completed) and can be removed from the permit.

3.2 Document References

In relation to application form Part C3, Question 3a1, the permit currently lists the following documents from the original application. These references; however, should be left in the permit as they relate to operational detail of the plant, and compliance with the relevant technical standards/BAT, neither of which will change following the variation.

Description	Parts	Date Received	Keep/Remove
Application	Application form stating Technical Standards; section 3a of form B3.	02/08/13	Keep
Application	Non-Technical summary vs 2; sections 4 & 5.	02/08/13	Keep
Response to Schedule 5 notice dated 16/05/9/13	Responses to questions 1 to 6.	20/09/13	Keep