

ENVIRONMENTAL MANAGEMENT SYSTEM

Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS

Recycling Lives Compliance Services Limited

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Waste, Planning & Environmental Consultants



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Site Information & Key Contacts List

Site Address:	Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS		
Site Operator:	Recycling Lives Compliance Services Limited	National Grid Ref:	NX 98756 29204

Contact	Description	Office Hours	Out of Hours
Nicholas Gittings Adrian Murphy	Directors	0330 175 1111	
Damien Snape	Environmental Compliance Manager	0330 175 1111	07790 582496
Lynda Smith	TCM	01723870467	01723870467
<u>Workington Community Hospital</u> Park Lane, Workington, CA14 2RW	Local NHS Hospital (Main)	01900 705000	999
	Accident & Emergency (A&E)	111	999
<u>Ann Burrow Thomas Health Centre</u> S William Street, Workington, CA14 2ED	Local Doctor Surgery (GP)	01900 603985	999 or 111
<u>Cumbria Constabulary</u> Workington Police Station, West Area Headquarters, Hall Brow, Workington, CA14 4AP	Local Police Non-Emergency	101	999
	Police Emergency	999	999
<u>Cumbria Fire and Rescue Service</u> Workington Fire Station, Moorclose Road, Workington, CA14 5BF	Fire and Rescue Service (in Emergency Dial 999)	101 or 01900 706100	999
<u>Environment Agency</u>	Environmental Regulator	03708 506 506	0800 80 70 60
<u>Cumberland Council</u> Allerdale House, Workington, CA14 3YJ	General Enquiries	0300 373 3730	0300 373 3730
<u>United Utilities</u>	Local Water Supplier / Sewerage Provider	0345 672 2888	0345 672 3723
<u>Oaktree Environmental Ltd</u> Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ	Specialist Advisor (Waste and Planning Issues)	01606 558833	N/A – call EA out of hours

1 Introduction

1.1 General

- 1.1.1 Oaktree Environmental Ltd have been instructed by Recycling Lives Compliance Services Limited (the operator) to prepare this Environmental Management System (EMS).
- 1.1.2 This EMS has been prepared in relation to waste operations undertaken at Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS The site is operated in accordance with the requirements of Environmental Permit Ref. EPR/FB3807SX (EP). The EP authorises the acceptance and recycling of hazardous and non-hazardous metal waste (comprising of batteries) and WEEE.
- 1.1.3 The permit boundary for the site is outlined in green on Drawing No. WORK/3421/02. All references to 'the site' in this EMS shall mean this area and the associated infrastructure, plant, and equipment.
- 1.1.4 This EMS has been prepared in accordance with the following guidance:
- a) The Environmental Permitting (England and Wales) (Amendment) Regulations 2018.
 - b) The Waste Batteries and Accumulators Regulations 2009.
 - c) Develop a management system: environmental permits.
 - d) Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste.
 - e) The Waste duty of care: code of practice – 2018.
 - f) Non-hazardous and inert waste: appropriate measures for permitted facilities published 12/07/2021.
 - g) Chemical waste: appropriate measures for permitted facilities published 18/11/2020.
 - h) Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities published 13/07/2022.
 - i) Climate change: risk assessment and adaption planning in your management system.

1.2 EMS Review

- 1.2.1 A member of senior management will review this EMS on an annual basis to ensure it is suitable and continues to accurately reflect the operations and systems undertaken on site and evaluate if these are still effective.
- 1.2.2 If upon review the EMS is considered to not suitably reflect operations or systems / processes undertaken, the relevant procedures will be updated where necessary. The EMS will be reviewed sooner in the event of any of the following:
- a) Changes in operations i.e. processes or equipment.
 - b) Changes / variations to the permit (including the permit boundary).
 - c) Changes to site infrastructure i.e. buildings.
 - d) Changes to Environmental Legislation.
 - e) A pollution incident.

1.3 Relevant Contacts

- 1.3.1 The contact details for the operator are as follows:

Recycling Lives Compliance Services Limited	Contact:	Nicholas Gittings / Adrian Murphy
Isabella Road,	Position:	Directors
Workington,	Tel:	0330 1751111
Cumbria,		
CA14 2JS		

- 1.3.2 Contact details for Oaktree Environmental are as follows:

Oaktree Environmental Ltd	Contact:	Emma Gibson
Lime House, 2 Road Two	Position:	Consultant
Winsford, Cheshire,	Tel:	01606 558833
CW7 3QZ	E-mail:	emma@oaktree-environmental.co.uk

- 1.3.3 A full list of relevant contacts (including key emergency contact numbers) is kept on site at all times and provided in the Site Information & Key Contacts List section in page vi above.

1.4 Site Location

- 1.4.1 The site is located at Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS as shown on Drawing Nos. WORK/3421/ 02. The site is centred at national grid reference NX 98756 29204 and can be accessed via an access road from Isabella Road.
- 1.4.2 The site is largely surrounded by a wider industrial estate with other industrial and commercial premises.
- 1.4.3 A full list of receptors within 1km of the site has been included in Table 1.1 overleaf. A Receptor Plan illustrating these receptors has also been prepared, see Appendix I, Drawing No. WORK/3421/04 – Receptor Plan.

Table 1.1 - Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
GP Shipping - Workington	Northeast	230
Rural Payments Agency	South	350
BCMS	South	400
NNL (laboratory)	Southeast	435
Clay Flatts Industrial Estate	Southeast	900
Residential Dwellings		
Sea View (residential dwellings)	Southeast	155
Care homes (residential)		
n/a	n/a	n/a
Schools		
St Michaels Nursery & Infant School	East	930
Watercourses / Surface Water Features		
River Derwent	North / East	165
Irish Sea	West	335
Infrastructure (major roads and transport links)		
Northern railway line	East	700
Workington Train station	East	710
Ecological Sites		
Special Protection Area (Marine)	West	335
Recreational / Tourist Attractions		
Vanguard Sailing Club	Northeast	100
Workington Beach	West	250
Slag bank	Southwest	450
Workington Town RLFC	East	800

1.5 Permitted Operations

- 1.5.1 The permit is required for the acceptance, storage, and treatment (all types of handling/processing) of waste prior to removal of hazardous and non-hazardous batteries and WEEE.
- 1.5.2 The operator is an Approved Battery Treatment Operator (ABTO) and Approved Battery Exporter (ABE).
- 1.5.3 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC; as extracted from Table 2.1 'activities' of the EP:

D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12.

D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

R4: Recycling / reclamation of metals and metal compounds.

R5: Recycling / reclamation of other inorganic materials.

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).

1.6 Hours of Operation

- 1.6.1 The site will be operated 24 hours a day 7 days a week.
- 1.6.2 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised vehicular or pedestrian access. There is an overnight security guard / watchman who will be present on site between 17:00 – 07:00 Monday – Friday and 24 hours over the weekend.

1.7 Staffing and Management

- 1.7.1 Table 1.2 details the minimum staff requirements when the site is open for the reception and processing of waste.

Table 1.2 - Staffing numbers and responsibilities

Position	Employees	Responsibilities
Site manager	1	Overall management of the site, ensuring the site is being operated in accordance with the EP and in-line with attendant regulations, including administration.
TCM	1	As above.
Site operatives	25	Waste handling / processing and plant operation.
Office / administrative staff	3	Office / administrative duties

- 1.7.2 Additional staff will be employed and be utilised on site during site development and throughout busy periods to carry out site maintenance works, plant maintenance, administration and record keeping.

1.8 Fit and Proper Persons

- 1.8.1 Site operations will be supervised by a Technically Competent Manager (TCM) who holds the relevant CIWM/WAMITAB qualification, including a Continuing Competence Certificate, where appropriate. The EA will be notified of changes to the TCM or appointment of temporary replacements before the changes come into effect. The TCM attendance hours per week will be agreed with the EA following issue of the permit but before operations commence.

- 1.8.2 A record of the TCM attendance, including start and finish times will be recorded in the site diary. These records will be made available to the Environment Agency for inspection on request.
- 1.8.3 The operator will ensure that in the absence of the TCM a nominated person will take on the appropriate responsibilities and act as competent person. The Environment Agency will be informed of any changes to the TCM and relevant replacement details.

1.9 Health and safety

- 1.9.1 All operations on site are carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. Conditions of site use for employees, visitors and contractors are shown in Appendix II. These conditions are shown to all site users and must be signed prior to using the site. Anyone refusing to comply with the conditions of use will be asked to leave the site.
- 1.9.2 All staff are trained and required to complete the forms shown in Appendix II to ensure they are aware of the potential Health & Safety issues on site, and they have the appropriate PPE to prevent any accidents.

1.10 Convictions

- 1.10.1 At the present time, neither Recycling Lives Compliance Services Limited nor any of the relevant people within the company had been convicted of a relevant offence.

2 Site Engineering and Infrastructure

2.1 Site Description

2.1.1 The site infrastructure is clearly detailed on Drawing No. WORK/3421/03. The drawing illustrates the following areas on site:

- i) Different surfaces i.e. impermeable, hardstanding etc.
- ii) Location of buildings.
- iii) Height / type of perimeter fencing.
- iv) Reception and storage areas of waste.
- v) Location of fixed plant / equipment i.e. loading hoppers, shredders, conveyors etc...

2.2 Site Office

2.2.1 The location of the site office is shown on Drawing No. WORK/3421/03 and the documentation to be retained on site (as a minimum) is listed in Table 2.1 below.

Table 2.1 - Site office documents

Documents to be retained in site office
The Environmental Permit (original & any subsequent variations) This Environmental Management System (EA agreed document) Fire Prevention Plan (EA agreed document) Current site diary (to record all inspections/visitors to the site) Environment Agency inspection (CAR) forms In-house inspection sheets/recording forms Duty of care transfer notes (for 2 years minimum) Hazardous waste consignment notes (rejected waste, etc., kept for 5 years) Waste delivery tickets Accident book (& 1st aid kit)

2.3 Weighing and Categorising Loads

2.3.1 There is a weighbridge located on site for accurate weighing of incoming and outgoing loads. During instances where the weighbridge is out of action, the weight of each load will be estimated using the following:

- a) Dolav bin comprising portable batteries – 800kg per bin.
- b) Barrels comprising lithium batteries – 38kg per barrel.

2.4 Notice board and signs

2.4.1 A notice board is erected at the site entrance and displays the following information:

- a) The site name and address.
- b) The name of the permit holder and operator.
- c) The Environmental Permit number and accompanying statement stating that the site is permitted by the Environment Agency.
- d) Environment Agency contact details, Emergency No. 0800 80 70 60 and
- e) General Enquires No. 03708 506 506.
- f) Operator's "out of hours" emergency contact details (telephone number).
- g) Operating hours.

2.4.2 Additional signs are displayed around the site for operational / health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

2.5 Site security

- 2.5.1 Site security is important to reduce the likelihood of unauthorised access to the site. The site is situated within a largely remote area, land use within closest proximity to the site comprises of a wider industrial estate. The only ingress / egress to the site is via Isabella Road.
- 2.5.2 Surrounding the external yard is predominantly 2 – 3m high palisade fencing and a mixture of concrete panel walls / bays. The entrance to the site is secured with lockable palisade gates which will remain locked whenever the site is to be unmanned / out-of-hours.
- 2.5.3 The operator employs an overnight security guard / watchman who will be on site between the hours of 17:00 – 07:00 Monday – Friday and 24 hours over the weekend who will prevent unauthorised access from potential trespassers.
- 2.5.4 In addition to the above, the site has 24-hour CCTV footage available covering all internal and external operational and waste storage areas. Any unusual or suspicious activity picked up which is not in line with site specific procedures will mean a call to the emergency services which would present the risk of arson.
- 2.5.5 Security measures are clearly shown on Drawing No. WORK/3421/03 and considered suitable to prevent unauthorised access into the site.
- 2.5.6 The site security will be inspected on a weekly basis and any defects which impair the effectiveness of the security will be repaired to the same or better standard within a suitable timescale. All repairs will be noted in the site diary within 24 hours of the event.
- 2.5.7 If unauthorised access becomes apparent as a problem at the site, the security measures will be reviewed, and improvements implemented.

2.6 Fuel Storage

- 2.6.1 No gas cylinders or aerosols will be stored on site, nor will there be chemicals present on site.
- 2.6.2 Fuel is stored on site, all refuelling of plant and equipment will take place using a drip tray to capture any fuel, the location of fuel storage is shown on Drawing No. WORK/3421/03.
- 2.6.3 The procedures for fuel and hazardous fluid storage on site are as follows:
- 2.6.4 The procedures for fuel storage on site are as follows:
- a) Tanks are surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank.
 - b) All pipework and associated infrastructure will be enclosed within the bund.
 - c) A lock will be fitted to the tank valve to prevent unauthorised operation.
 - d) Any storage of oil will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 SI No.2954 or any subsequent legislation.
 - e) All valves and gauges on the bund will be constructed to prevent damage caused by frost.
 - f) No combustible waste will be stored within 6 metres of any fuel/fluid's storage without a fire wall in place.
 - g) All tanks storing fuel, oil or hazardous material are clearly marked showing the product within and their capacity.

2.7 Rejected Waste

- 2.7.1 All loads are examined prior to acceptance, if they are found to be unacceptable at this point loads will be rejected. If small levels of contamination are noted, they are handpicked and reject materials placed in a skip for safe disposal. Any waste which is rejected will be stored in a quarantine area.

2.8 Drainage

- 2.8.1 The drainage arrangements for the site are clearly shown on Drawing No. WORK/3421/03. The site comprises of an impermeable yard with sealed drainage system. Surface water from the operational area of the yard is collected via a series of manholes or an underground surface water sump. This sump acts as a primary collection point, allowing for the temporary storage and settlement of solids. From the sump, water is conveyed through underground pipework to a full retention single stage interceptor tank, which is designed to remove oils, sediments and other potential contaminants commonly associated with external yard areas and vehicle movements. Following treatment in the interceptor, water is captured and retained within a sealed underground storage tank prior to removal from site to a suitably permitted facility. Therefore, there will be no surface water discharged from site.
- 2.8.2 There will be no surface water associated with waste storage and treatment operations undertaken within the warehouses, roller shutter access points can be entirely sealed to prevent any water ingress, or any potential water contaminates and spillages escaping.
- 2.8.3 The available capacity of the tank will be monitored on a monthly basis or more frequently during periods of heavy rainfall to ensure it is emptied before reaching capacity. The operator will have the interceptor emptied every 12 months or when the tank is at 80% capacity whichever is the sooner.

2.9 Vehicles, plant and equipment

- 2.9.1 Waste will be handled / processed using the plant listed in Table 2.2 below. Only trained operators will be permitted to operate the plant listed. Any changes to the list will be notified to the EA prior to implementation.

Table 2.2 – Plant & Equipment

Item	Number	Function
Forklift	4	Manoeuvring of waste batteries around the site
Pallet truck	4	Manoeuvring of waste batteries around the site
Screener (size grading system)	2	Sorts batteries based on physical dimension (size)
X-Ray screen	1	Separate batteries by chemistry
Shredder	1	Shredding of batteries to reduce material by size and further separate materials
Dryer	1	Removal of residual electrolytes and moisture after mechanical shredding
Air separator	1	Separate lighter fractions i.e. plastic, paper etc from the shredded material
Eddy current separator (ECS)	1	Magnetic separation of non-ferrous metal from non-metallic materials
Ultra-sonic sieve	1	Used to finely separate black mass from coarser materials

2.10 Mobile Plant Preventative maintenance

- 2.10.1 All mobile plant on site will be subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts.
- 2.10.2 Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day using a checklist similar to that in Appendix II to ensure the following:
- Mobile plant is mechanically sound for use and no presence of black fumes or trailing liquids visible prior to use or following shutoff of plant/equipment.
 - Mobile plant is stored in the out-of-hours plant storage area as shown on Drawing No WORK/3421/03 following cessation of activities and external separation distances of 6m are observed between plant and any combustible or flammable material.

- c) In the building, all plant will be powered down and completely shut off prior to cessation of operations on any given day.
- d) Plant which is not in use for any extended period is stored at least 6 metres from combustible or flammable material.
- e) All mobile plant will contain firefighting equipment inside.
- f) Dust from processing/treatment operations on site can settle throughout the working day onto processing plant, plant exhausts and engine parts so a fire-watch will be implemented after cessation of works and equipment powered down for 1 hour each day to remove any dust/fluff using brushes, hoses etc... Any build of dust/fluff will be removed from the equipment and deposited into an adjacent refuse bin which will be emptied when full.

3 Site Operations

3.1 Preliminary procedures

- 3.1.1 Guidance is given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types and operations which are acceptable at the site i.e. a copy of the EP is available in Appendix IV of this EMS. Visitors to the site will sign the visitor's book upon arrival and exit stating the purpose of their visit and whom they represent. The procedures below are followed prior to the receipt of waste on site.
- 3.1.2 All hazardous waste should be accepted in conjunction with a Hazardous Waste Consignment Note (HWCN) in accordance with the Hazardous Waste (England and Wales) Regulations 2005.
- 3.1.3 When a driver employed by the permit holder arrives at the waste producers' premises, he/she will inspect the load for conformity with relevant regulations and safety procedures:
- a) If the load is satisfactory the driver will sign the relevant paperwork (Duty of Care transfer note/delivery ticket/HWCN) and remove the load from the premises.
 - b) If the waste does not meet the description stated on the controlled waste transfer note the customer is advised to check the note and give a more detailed description of the waste.
 - c) If the more detailed description of the waste reveals that the waste is not permitted, then the customer is advised that the waste must be taken to another site which is appropriately permitted to accept the waste(s).
 - d) If further instructions are needed the driver may also report back to the site manager.
 - e) Where it is suspected that the details given on the transfer note are incorrect the EA may be contacted for advice.

3.2 Checking in & inspection of loads (general)

- 3.2.1 All persons delivering waste to the site are required to report to the site manager upon arrival (including employees of the operator) where the details of the load will be recorded, and the transfer note and accompanying documentation checked. If the waste does not meet the description stated on the controlled waste transfer or HWCN the customer is advised to check the note and give a more detailed description of the waste. If the more detailed description of the waste reveals that the waste is not permitted at the site, then the customer is advised to find an alternative site.
- 3.2.2 Once a load has been accepted, a visual inspection of the contents will be carried out to ensure that the material complies with the EP. If non-compliant waste is discovered before deposit into the appropriate waste storage area, the load will not be accepted and disposed of at an approved facility. In cases where the presence of unauthorised waste is likely to lead to a breach of permit conditions, the EA will be contacted immediately to agree a course of action.

3.3 Waste Acceptance procedure

- 3.3.1 Strict waste acceptance procedures are in place at the site as shown below.
- 3.3.2 The following details will be recorded for every load deposited at the site:
- a) Vehicle Registration and drivers name and signature.
 - b) Waste haulier name and valid waste carriers' registration number.
 - c) Name address (of source site) and signature of transferor.
 - d) Name, address (of destination site) and signature of the person receiving the waste (transferee).
 - e) Permit number or exemption reference of person receiving the waste (if applicable).
 - f) Description of waste including waste type, waste source, waste containment and waste quantity.
 - g) List of Waste (LoW) code.
 - h) SIC code of the waste holder.

- i) Date and time of waste transfer and waste transfer note number.
- j) Confirmation that the waste hierarchy has been considered.

3.3.3 Following the above waste will undergo a visual inspection prior to acceptance to check the load is acceptable in accordance with the EP. Any non-conforming loads / waste discovered will be handled in accordance with the below procedure.

3.3.4 Waste types including the European Waste Catalogue (EWC) codes authorised to be accepted at the site are outlined in Table 3.1 below.

Table 3.1 - Authorised EWC codes

CODE	WASTE TYPE
16	WASTES NOT OTHERWISE SPECIFIED ON THE LIST
16 02	wastes from electrical and electronic equipment
16 02 09*	transformers and capacitors containing PCBs
16 02 10*	discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09
16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 12*	discarded equipment containing free asbestos
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	hazardous components removed from discarded equipment
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
16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
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 21*	fluorescent tubes and other mercury containing waste
20 01 23*	discarded equipment containing chlorofluorocarbons
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	batteries and accumulators other than those mentioned in 20 01 33

CODE	WASTE TYPE
20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

3.4 Hazardous waste consignment note

- 3.4.1 The operator will accept hazardous waste comprising of batteries and WEEE into the site for storage and treatment. Hazardous waste requires a hazardous waste consignment note (HWCNs) prior to acceptance if it is the second movement of the waste. This note must be prepared before waste is moved.
- 3.4.2 A HWCN will be produced only in the following scenarios:
- a) collections of hazardous wastes from businesses by registered waste carriers.
 - b) movements of hazardous wastes from one premises to another within the same business.
 - c) movements of hazardous wastes from customer premises, where another business has produced waste.
- 3.4.3 A HWCN is not needed to move hazardous waste for:
- a) the movement of domestic hazardous waste from a domestic household to an initial collection point i.e. members of the public dropping batteries at recycling points; or,
 - b) waste imported or exported under international waste shipment controls which uses a different movement note.

- 3.4.4 The operator will ensure that the following procedures in place when accepting hazardous wastes using a HWCN are undertaken at the site:
- a) Classify the waste correctly.
 - b) Check and complete the relevant parts of the consignment note before any waste is accepted into the site (If consignment note is missing, incorrect or incomplete; the waste will be rejected).
 - c) The operator will keep a copy of the consignment note and provide a copy to the carrier.
 - d) Once accepted the waste will need to be separated and stored safely.
 - e) The operator will send consignee returns to the Environment Agency.
 - f) The consignment note records will be kept on site for 5 years.

3.5 Non-conforming waste

- 3.5.1 All waste prior to being accepted at the site for storage is checked in the acceptance and inspection area as shown on Drawing No. WORK/3421/03 to ensure it is suitable, any non-conforming waste loaded back onto the delivery vehicle and not accepted. If non-conforming waste is discovered on site, there is a clearly marked quarantine container / area to temporarily store this.
- 3.5.2 Once the waste has been accepted, the following procedures in Section 4 will apply.

3.6 Waste types and quantities

- 3.6.1 The waste types accepted at the site are those as defined in the Controlled Waste (England & Wales) Regulations 2012, the Hazardous Waste (England and Wales) Regulations 2005 and Section 75 of the Environmental Protection Act 1990 consisting of batteries.
- 3.6.2 A list of authorised EWC does can be found in Table 3.1 in the Waste Acceptance Procedure or the EP in Appendix III.
- 3.6.3 Waste storage information including locations and quantities of waste is shown in Table 3.2 overleaf.
- 3.6.4 The total quantity of hazardous waste stored on site at any one time will not exceed 5,000 tonnes and will be stored in sealed weatherproof containers.
- 3.6.5 If the maximum storage capacity of the site is reached, then no further waste will be accepted until waste can be removed from the site and taken to a suitably permitted or exempt site.

Table 3.2 - Waste Storage Area Details

Storage Area Details												
Plan Ref	Description	Storage type / Containment	Max Width (m)	Max Length (m)	Max storage height (m)	Approx. Area (m2)	Conversion factor used	Approx. volume (m3)	Approx no. of pallets / containers	Approx. tonnage	Max storage time	Comments
AREA A	Battery checking and inspection area prior to sorting and treatment	Sealed acid-resistant containers (dolav pallet boxes)	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	Maximum 48 containers	38.5 tonnes (800kg per container)	<12 hours	Containers are initially inspected here to check for any non-conforming items prior to storage in the yard before processing. Battery boxes will not be stacked. No waste is stored here outside of operational hours
AREA 2	Unprocessed mixed batteries	Sealed acid-resistant containers (dolav pallet boxes) with weatherproof covering	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 containers per bay	38.5 tonnes (800kg per container)	<12 months	Containers are stored within bays stacked two containers high. All containers will be stored so they are accessible from at least one side.
AREA 3	Unprocessed mixed batteries from AATF'S	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 containers per bay	38.5 tonnes (800kg per container)	<12 months	As above
AREA 4	Unprocessed mixed batteries from HWRCs	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	224 containers	179 tonnes (800kg per container)	<12 months	As above
AREA 5	Overflow storage area for sorted batteries (by chemistry)	Recycled batteries stored in tonne bags on pallets with tarpaulin placed over each pallet	1 (per pallet)	1.2 (per pallet)	1	1.2 (per pallet)	1	1 per pallet	84 pallets (84 bags)	84 tonnes (1 tonne per bag)	<12 months	Batteries stored will have been sorted by chemistry and stored in tonne bags on pallets ready for despatch. Sorted batteries stored in the yard will have tarpaulin placed over them
AREA 6	Overflow storage area for sorted batteries (by chemistry)	Recycled batteries stored in tonne bags on pallets with tarpaulin placed over each pallet	1 (per pallet)	1.2 (per pallet)	1	1.2 (per pallet)	1	1 per pallet	84 pallets (84 bags)	84 tonnes (1 tonne per bag)	<12 months	As above
AREA 7	Overflow storage batteries - see AREAS 1 - 6 (storage type may vary)	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	150 containers	100 - 120 tonnes (800kg per container)	<12 months	As above

AREA 8	Battery storage (storage type may vary)	Depending on the battery type unprocessed batteries will be stored in either dolav boxes, barrels or tonne bags.	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	72 pallets (648 barrels or 72 containers)	24.6 – 72 tonnes (342kg per pallet of barrels or 800kg per container)	<12 months	Batteries will either have been sorted by chemistry or unsorted and awaiting processing.
AREA 9	Battery storage (storage type may vary)	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 pallets per row (432 barrels or 48 containers)	16.4 – 48 tonnes per row (342kg per pallet of barrels or 800kg per container)	<12 months	As above
AREA 10	Processed / sorted batteries for shredding (sorted by chemistry)	Sorted batteries stored in pallet boxes awaiting shredding	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	170 containers	136 tonnes (800kg per container)	<12 months	Batteries will have been sorted by chemistry and are awaiting further processing via shredding
AREA 11	Electrolyte & volatiles	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	2 containers	1 tonne per container	<12 months	Container moved to AREA 14 when at capacity and replenished with empty container
AREA 12	Paper & plastic	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	2 containers	1 tonne per container	<12 months	As above
AREA 13	Ferrous metal, aluminium, copper	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	3 containers	1 tonne per container	<12 months	As above
AREA 14	Zinc / Manganese powder (black mass)	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	1 container	1 tonne per container	<12 months	As above
AREA 15	Dismantled WEEE	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	5 containers	1 tonne per container	<12 months	Containers replenished with empty ones when full / removed
AREA 16	Overflow storage from shredding line (contents may vary)	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	5 - 10 containers	1 tonne per container	<12 months	Containers replenished with empty ones when full / removed

3.7 Waste handling, storage & treatment

3.7.1 The waste treatment processed is summarised below:

- a) Prior to acceptance loads will undergo an initial visual inspection in AREA A to check for compliance with the EP and for any non-conforming wastes. This area will remain clear out-side of operational hours. During this initial inspection a handheld thermography (infrared) camera will be utilised to identify any abnormal heat signatures or developing hotspots. Any hotspots discovered are removed and isolated / quarantined.
- b) Once accepted at the site, mixed loads will be stored in the appropriate storage area depending on source i.e. from HWRC's or AATF's etc...
- c) Mixed batteries undergo an initial sort via the sorting machine which utilises a vibrating feeder to separate batteries by size and type, see Drawing No. WORK/3421/05. There are two sorting machines on site, one for incoming loads from HWRC's and the other for AATF's. Both lines of plant are identical and provide the same process but ensure batteries remain segregated by source.
- d) The sorting machine deposits batteries by size / type into 60l containers beneath the vibrating grid. Any unspecified or larger batteries are deposited into separate containers for further processing via x-ray machine.
- e) Following the initial sort described above batteries undergo further processing and sorting via an X-ray machine. An advanced X-ray system scans the batteries to identify their internal chemistry.
- f) Batteries that have been sorted by chemistry will be stored in 1 tonne bulk bags with the exception of lithium batteries which will be stored in sealed barrels with vermiculite. Sorted batteries will either be removed from site by chemistry or processed further via shredding.
- g) Batteries to be shredded will be stored in AREA 10 prior to treatment. Shredding batteries breaks them down into smaller fractions allowing for separation of different materials within the battery such as metals, plastic and electrolytes.
- h) Hazardous and non-hazardous batteries will be shredded separately to ensure there is no mixing of residual waste produced as part of the shredding activity.

- i) Following shredding the plant utilises a vacuum dryer to remove any residual moisture. A vacuum pump is used to lower the pressure inside the dryer. By reducing the air pressure, the boiling point of residual moisture is lowered, allowing it to evaporate at lower temperatures.
- j) The process of vacuum drying is particularly useful for removing moisture without applying excessive heat which could cause further adverse/chemical reactions. The controlled environment ensures that volatile organic compounds (VOCs) and harmful gases (if any) are safely removed without causing reactions that could lead to fires.
- k) The end result following drying is dry shredded material with significantly reduced moisture content.
- l) After vacuum drying, the material is processed through an air separator, which uses airflow to separate lighter materials (such as paper and plastic) from the heavier components. Paper and plastic are deposited into separate IBC containers ready for removal from site for further recycling or disposal.
- m) The remaining material primary consisting of metals (ferrous and non-ferrous) is processed through an Eddy Current Separator (ECS). The ECS utilises a high speed rotating magnetic rotor to create a magnetic field causing non-ferrous metals to be repelled and deposited out of the main material stream. Separated ferrous and non-ferrous metals are deposited into IBC containers for further processing off site.
- n) The final stage in the process utilises an ultra-sonic sieve. The sieve uses high-frequency sound waves to create very fine vibrations which separates black mass from any leftover residual material. Black mass is collected in a sealed IBC container beneath the processing line, separating the black mass allows for easier recovery keeping the black mass clean and free from contamination.
- o) The above separated fractions will be stored in the appropriate storage areas as shown on Drawing No. WORK/3421/03.

3.8 Storage Identification

3.8.1 To support effective site management and waste identification, ensuring traceability of battery waste, the operator implement a visual colour-coded cable tie system to clearly and consistently identify the status of battery waste stored on site. This allows the operator to:

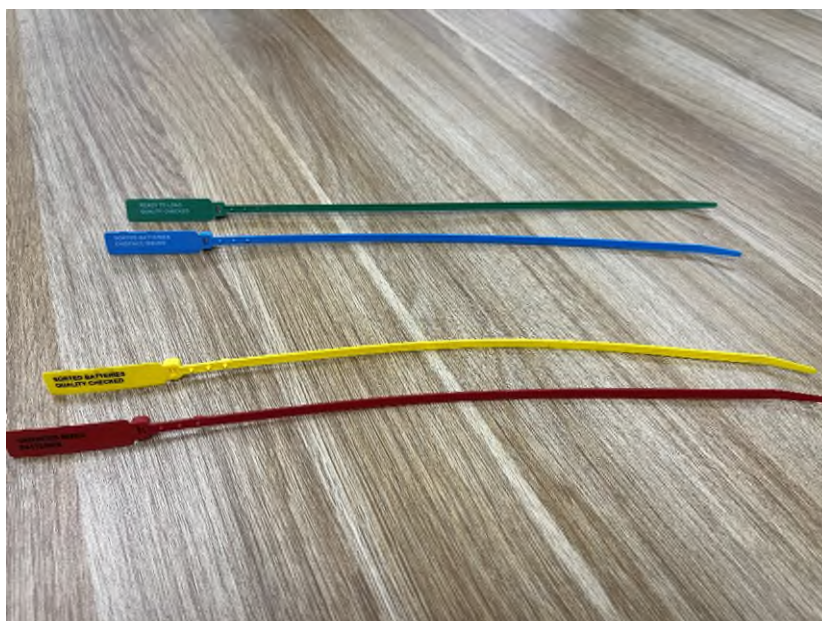
- a) Have a quick identification of risk level.
- b) Segregation of unsorted or unverified waste.
- c) Prioritisation of material for further processing, movement or compliance checks.

3.8.2 The cable tie colours, and their meanings are as follows:

- **Green** – batteries have been quality checked and are ready for loading or removal from site.
- **Blue** – sorted batteries with compliance evidence issued.
- **Yellow** – sorted batteries that have passed quality checks, pending documentation / compliance evidence.
- **Red** - unsorted mixed batteries, requiring processing.

3.8.3 An example of the cable tie identification system is illustrated in Figure 3.1 below.

Figure 3.1 - Cable Tie Identification System



3.8.4 The cable tie system contributes directly to fire risk reduction by:

- a) **Preventing the accidental co-storage** of unsorted (higher risk) batteries with checked or processed materials.
- b) **Supporting faster emergency response** by clearly identifying containers that may present unknown or elevated risks (red ties).
- c) **Ensuring sorted and quality assured waste** is prioritised for removal within designated storage times, reducing prolonged accumulation of combustible material.
- d) **Minimising handling errors** by operational staff and external contractors, reducing the likelihood of combustion / ignition through mishandling.

3.8.5 All staff are provided with training on the cable tie coding scheme as part of their site induction and refresher training / toolbox talks.

3.9 Waste/product removal and export

3.9.1 When a collection vehicle arrives at the site the driver will be instructed to report to the site office on arrival. All relevant documentation will be completed, and the vehicle will be passed to pick up the load and take it to the designated customer, recycler/disposal site. The product or waste material will be loaded onto the vehicle and quantified prior to egress from the site.

3.10 Record keeping

3.10.1 Recycling Lives Compliance Services Limited use detailed waste transfer and product notes in paper and electronic form to ensure compliance with the Waste Duty of Care Code of Practice - November 2018 (Section 34(9) of the Environmental Protection Act 1990). The following points detail the correct information required in order to comply with the Waste Duty of Care Code of Practice which the operator will provide on all documentation:

- a) a written description of the waste which has been agreed and signed by the operator and the next holder. The description is part of the waste information the operator will provide.
- b) a statement confirming that the operator has fulfilled the duty to apply the waste hierarchy as required by regulation 12 of the Waste (England and Wales) Regulations 2011 (see Waste Hierarchy Guidance for England and Wales).
- c) the description of the waste is accurate and contains all the information required to ensure the lawful and safe handling, transport, treatment, recovery or disposal by subsequent holders, including classification of the waste by using the appropriate codes (referred to as the List of Wastes (LoW) or European Waste Catalogue (EWC)) - Appendix A of the Waste Classification Technical Guidance provides a list of the codes as well as advice on how to assess and classify waste.
- d) the quantity and nature and whether it is loose or in a container, if in a container, the type of container
- e) the time and place of transfer
- f) the SIC code of the transferor (current holder of the waste)
- g) the name and address of the transferor and transferee (person receiving the waste) and their signatures (the signature can be electronic as long as an enforcement officer can view it)
- h) the capacity in which the transferor and transferee are acting (e.g. as a producer, importer or registered waste carrier, broker or dealer) and their relevant authorisation to act in that capacity (e.g. their permit number or registration number).

3.10.2 For non-hazardous waste this will be done by using:

- a) a paper WTN and form to fill in or alternative documentation e.g. an invoice, as long as it contains all the required information.
- b) a season ticket which is a single waste transfer note that covers a series of non-hazardous waste transfers. The season ticket will last up to one year and be used for regular transfers of the same type of non-hazardous waste with the same carrier. If the operator has several sites serviced by the same carrier with the same types of waste collected, these can be listed in a schedule to the season ticket. The operator will keep a record of the collection times and the quantity of waste.

3.10.3 A waste information note will not be required for non-hazardous waste if the waste holder does not change on the transfer of waste e.g. the waste is moved to other premises belonging to the same business. However, it is best practice that the business understands who has responsibility for that waste and a record is kept of internal transfers for audit purposes.

3.10.4 **Hazardous waste:** The operator will be accepting hazardous waste into the site and this will be done so using a fully completed hazardous waste consignment note (HWCN). All outgoing waste be sent to a suitably permitted site using a HWCN. The records of which will be kept for 5 years.

3.10.5 A summary of waste types and quantities deposited at and removed from the site and origin and destination details are then forwarded to the EA using the standard Generic Operator Returns electronic spreadsheet(s), with submission due within one month of the end of each quarter as overleaf:

- a) Quarter 1: January to March (due on or before 30th April)
- b) Quarter 2: April to June (due on or before 31st July)
- c) Quarter 3: July - September (due on or before 31st October)
- d) Quarter 4: October - December (due on or before 31st January of the following year)

3.10.6 Outcomes of inspections of waste types, hardstanding areas, transfer/treatment areas, storage areas, drainage channels, etc. are recorded using the site inspection form or similar

document and detailed comments are entered into the site's diary (including action taken or proposed).

- 3.10.7 Visitors to the site are made to sign the visitor's book upon arrival and exit stating the purpose of their visit and whom they represent.

3.11 Management techniques

- 3.11.1 All measures necessary to achieve a high level of protection of the environment and to ensure that the site is operated in accordance with this EMS and EP conditions will be strictly adhered to.

- 3.11.2 The manner in which the facility is managed is a critical element in ensuring emissions from the site operations are minimised. Therefore, management of this facility will ensure:

- a) staff are competent to manage and operate the facility i.e. fit and proper persons;
- b) waste acceptance procedures are in place;
- c) appropriate storage and handling procedures are in place;
- d) waste/product despatch procedures are in place;
- e) procedures and control techniques in place to minimise potential emissions to air, land and water;
- f) there is an EMS, i.e. this document, in place to ensure standards are maintained, including incidents and complaints management procedures;
- g) a communication programme is in place; and,
- h) a health and safety programme is in place and is coherently conveyed to all staff and rigorously enforced throughout the whole of the organisation.

3.12 Site closure plan

- 3.12.1 In the event that the site ceases to operate as a waste facility as set out in the site's EP, the following steps will be followed to achieve site closure:

- a) Contact the EA to advise the Environment Officer(s) that the site is planned to cease / has ceased the acceptance of wastes under the permit.
- b) The amount of waste on site will be assessed by the TCM to set a timetable for the final processing and timely removal of waste from site.
- c) Following removal of all waste, plant and machinery from site a Site Investigation will be undertaken to ascertain the ground conditions of the land to which the site relates (if feasible).
- d) A surrender application will then be submitted to the EA for determination.

4 Environmental Control, Monitoring and Reporting

4.1 Breakdowns and spillages

- 4.1.1 In the event of breakdown of the loading plant, an alternative machine will be brought on site until it is repaired. If an alternative machine cannot be used, then waste will be stored securely until the plant is repaired. The repair will be carried out at the most convenient location with absorbents and spill kits used to clear oil or fuel spillages.
- 4.1.2 All site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a skip for disposal to a suitably permitted site.
- 4.1.3 All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or are temporarily suspended.

4.2 Site inspections and maintenance

- 4.2.1 The inspection frequencies for maintenance/housekeeping are listed on record form WORK/RF/4. The inspection form will be completed by a person who is familiar with the requirements of the EMS and EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in the site diary. All repairs will be carried out within 5 working days unless agreed otherwise with the EA.
- 4.2.2 All repairs to site security will be made within 5 working days of the discovery of the damage and the site will be made secure until the repair has been completed.
- 4.2.3 Any major defects found during the daily site inspection will be repaired at the time they are found, where possible. If a repair is not possible the EA will be contacted to agree a suitable timescale for repair.
- 4.2.4 All defects and problems likely to give rise to pollution will be recorded on the daily inspection form with repairs/solutions being carried out immediately.

4.3 Site inspection form

An inspection form for the purpose of recording site activities will be maintained on site and be used to record information relevant site operations. The following information will be recorded:

- a) The identity of the signature of the inspection personnel;
- b) The date and time of the inspection (or event);
- c) The inspection details and any actions taken; and,
- d) The name of the nominated deputy in the absence of the site manager.

4.4 Security monitoring

- 4.4.1 The security infrastructure including CCTV and site perimeter will be checked daily by operational staff to ensure it is fit for purpose and functioning adequately. Any defect will be reported to the site manager / TCM and noted on an inspection form to ensure the issue is rectified as soon as practically possible.

4.5 Control of dust

- 4.5.1 The containment of waste within the site and the nature of the wastes accepted at the site present a very low risk of dust. The shredding of batteries is undertaken within a building and utilises a closed dust extraction system for the containment of dust.
- 4.5.2 In the yard waste is stored in sealed weatherproof containers or are covered with tarpaulin and do not present an issue regarding dust.

4.6 Odour control

- 4.6.1 The containment of waste within the site and the nature of the wastes accepted at the site present a very low risk of odour nuisance. If malodorous waste is discovered, it will be consigned to the quarantine area for rejected waste or removed from the site immediately.

4.7 Control of pests, birds and other scavengers

- 4.7.1 It is unlikely that vermin will present a problem, due to the waste types handled at the site, but a recognised pest control contractor will be brought in within 48 hours if any problems are encountered. The site will be inspected daily for the presence of vermin and the results of the inspection noted in the site diary or site inspection form.

4.8 Control and monitoring of noise & vibration

- 4.8.1 The rural location and surrounding land uses being predominantly industrial means noise associated with the operations will not greatly increase the existing noise level in the surrounding area. The waste operations will be carried out using the best practicable means at all times.
- 4.8.2 The likely sources of noise arising from the development, and the actions to be taken / procedures to be followed or planned in order to prevent or minimise noise levels are shown in Table 4.1 below.

Table 4.1 - Noise Management Table

Potential Noise Source	Action to be taken to prevent or minimise noise
Loads delivering waste to the site	All vehicles are required to be driven onto and off site with due consideration for neighbouring premises. A 5mph speed limit is implemented on site.
Loading/unloading of delivery vehicles	Vehicles must be well maintained and operated with silencers. Moving parts to be regularly lubricated. All vehicles must be driven slowly around the site (5mph site speed limit). Engines to be switched off when not in use. Reversing alarms to be preferentially fitted with white noise alarms to minimise impacts on neighbouring sites.
Operation of plant	Switched off when not in use. Plant to be well maintained and operated with silencers in accordance with manufacturer recommendations. Moving parts to be regularly lubricated. All vehicles must be driven slowly around site. Plant will be operated and maintained in accordance with manufacturers recommendations.
Small vehicles travelling to and from the site (e.g. staff and visitor's cars, courier van deliveries etc.)	All those working on and visiting the site to be made aware of need for considerate driving and keeping vehicles well maintained. Small vehicles will arrive marginally earlier than the main site operating hours.

4.9 Complaint's procedure

4.9.1 Any third-party complaints received will be recorded in the site diary and will include a record of the complaint, particulars of the complainant and details of any action taken to alleviate the problem to ensure the likelihood of a future third party complaint is minimised. Any complaints will normally be completed, signed and dated by site management. Information recorded will be as follows:

- The name, address and telephone number of the caller will be requested.
- Each complaint will be given a reference number.
- The caller will be asked to give details of:
 - i) the nature of the complaint;
 - ii) the time;
 - iii) how long it lasted;
 - iv) how often it occurs;
 - v) Is this the first time the problem has been noticed; and
 - vi) what prompted them to complain.
- The person completing the form will then, if possible, make a note of:
 - vii) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - viii) strength and direction of the wind; and
 - ix) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
 - x) The reason for the complaint will be investigated and a note of the findings added to the report.
- The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the Environment Agency and or the Local Authority.

- Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.

5 Emergency Procedures & Contingencies

5.1 General

- 5.1.1 In addition to obligations imposed by RIDDOR '13 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) the permit holder will notify the EA of any serious injuries to employees of the operator, other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes etc. will be recorded in the operator's accident book. Separate procedures will be used for different types of emergencies. An emergency at the site is defined by the site management as follows:

"Any incident which is likely to result in harm to human health or pollution of the environment or serious breach of permit conditions and serious detriment to the amenities of the locality."

- 5.1.2 For all emergency situations, the deposit of any further waste will be suspended where necessary to allow action to be taken safely. If necessary, staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards. Staff handling the emergency will be provided with and trained to use the necessary PPE (personal protective equipment) unless the manager instructs them that the hazard is too severe and outside help is needed from the emergency services or specialist waste contractors. A visitor's book will be kept to check who is on site at all times.

5.2 Fire

- 5.2.1 No waste will be burnt on site. In the event of a fire occurring on site, the operator/site manager will exercise their judgement and extinguish the fire with the suitable fire extinguisher and/or call the fire service for assistance. Any fires will be reported to the EA on the working day that they occur. All staff will be evacuated from the site if necessary. Smoking is not permitted on site. Firefighting residues will be disposed of to a permitted waste management facility.

- 5.2.2 The site will be operated in accordance with an approved Fire Prevention Plan (FPP) which is a stand-alone document dealing with the prevention, mitigation and handling of any fires on site (please refer to Document Reference WORK-3421-B). Please refer to this FPP as the main site management document pertaining to fire-related issues and management, control, and emergency procedures for fires on site.
- 5.2.3 For quick reference, the following actions will be taken when fire is detected or suspected (site operatives):
- a) DON'T PANIC.
 - b) RAISE THE ALARM (IF NOT DONE SO ALREADY).
 - c) NOTIFY THE SITE MANAGER (IF SAFE TO DO SO).
 - d) **DO NOT TRY TO TACKLE THE FIRE YOURSELF UNLESS YOU ARE TRAINED IN DOING SO AND YOU ARE SURE OF THE NATURE OF THE FIRE.**
 - e) LEAVE THE BUILDING USING THE NEAREST EXIT (I.E. FIRE DOOR OR ROLLER SHUTTER DOOR) AS QUICKLY AND AS ORDERLY AS POSSIBLE.
 - f) ASSEMBLE AT THE SPECIFIED FIRE ASSEMBLY POINT WHICH IS LOCATED BY THE SITE ACCESS GATES.
 - g) THE SITE MANAGER OR DELEGATED OPERATIVE WILL BE IN CHARGE OF CALLING THE EMERGENCY SERVICES ON "999" AND ENSURING THAT ALL PERSONS WHO WERE WORKING IN THE BUILDING ARE ASSEMBLED SAFELY.
 - h) INFORM ALL NEIGHBOURING PREMISES WHO ARE LIKELY TO BE AFFECTED
 - i) INFORM THE ENVIRONMENT AGENCY.
 - j) DO NOT RETURN TO THE SITE UNTIL YOU HAVE BEEN GIVEN THE 'ALL CLEAR' BY THE EMERGENCY SERVICES AND THE SITE MANAGER.

5.3 **Breakdowns**

- 5.3.1 In the event of plant breakdowns, alternative plant will be sourced until the existing plant is repaired to prevent potential over storage of waste. If an alternative plant cannot be used then waste will be stored securely until the plant is repaired and if necessary, waste will be diverted to an alternative site. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages.

- 5.3.2 Essential spares for plant maintenance are kept on site to ensure a repair can be carried out efficiently.

5.4 Staff shortages

- 5.4.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

5.5 Closure of destination sites

- 5.5.1 In the event of destination site closures or seasonal demands for wastes leading to a longer storage duration, the operator can divert incoming waste and send stored waste to one of alternative sites or use the EA's public register for alternative sites who could take this material and then contact the destination site. The operator has more than one contract set up for outlets of material to plan for this event.

5.6 Operational failure

- 5.6.1 The site manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

6 Weather conditions & adapting to climate change

6.1 Climate change

6.1.1 The Met Office UK Climate Projections (UKCIP) has developed scenarios of climate change, which are summarised as:

- a) Warmer, wetter winters
- b) Hotter, drier summers
- c) Increased frequency and intensity of extreme weather (storms, droughts, intense downpours)

6.1.2 Reflecting these, the UK Climate Change Risk Assessment (CCRA) identifies a number of priority risks and opportunities. The likely direct climate change-related threats that can be considered to be of most relevance to minerals planning and management are:

- a) increases in the probability and severity of flooding (fluvial, groundwater, surface);
- b) exposure to high temperatures and heatwaves; and
- c) shortages in availability of water.

6.2 Flood risk / Increased rainfall

6.2.1 The site is within Flood Zone 1. Land within flood zone 1 is classified as the lowest probability of flooding having less than 0.1% annual probability.

6.2.2 The site comprises previously developed land and no construction of new buildings is proposed.

6.2.3 Therefore, it is considered that the proposed development is not at risk from flooding and would not increase the risk of flooding elsewhere.

6.3 High temperatures and heatwaves

- 6.3.1 Dry weather periods would not increase the risk of dust due to the types of waste accepted and the manner in which they are handled and processed.
- 6.3.2 Dry weather periods could potentially increase the risk of fire and self-combustion of waste types stored and handled on site.

6.4 Availability of water

- 6.4.1 As specified above, the wastes accepted at the site is not considered to generate dust and therefore in the event of a hosepipe ban would not be considered detrimental to site operations.
- 6.4.2 There is a minimum of 2 no. 30,000 litre rainwater harvesting tanks located on site which would be utilised in the event of water shortage.
- 6.4.3 Due to the waste types handled on site (batteries / electrical) it is considered in the event of a fire water would not be the main form of suppression to extinguish a fire due to its potential to increase the integrity of a battery fire. Therefore, it is not considered availability of water will significantly impact the site.

6.5 Weather conditions

- 6.5.1 The operator has set up to receive weather alerts from the Met Office for the following weather conditions which could cause a potential complaint off site or potential breach of permit:
 - a) Prolonged periods of heavy rainfall causing mud and surface water ponding.
 - b) High winds creating a risk of litter and dust escaping beyond the site boundary, however this is unlikely due the operations undertaken at the site and the waste storage requirements.

- c) Droughts or periods of hot weather which could lead to water shortages, hosepipe bans and increased fire risk.
- d) Dense fog leading to poor visibility causing accidents.

6.5.2 The operator will install the following preventative measures to ensure the above conditions do not hinder operations or cause environmental harm:

HEAVY RAINFALL

- a) Vehicles exiting the site will undergo a more thorough check to ensure mud is not tracked off site.
- b) Should long periods of rainfall be likely, the site may consider hiring (as a result of daily inspections) a third-party road sweeper to cover the wet period to ensure surfaces are swept thoroughly throughout the day.

HIGH WINDS

- c) Wastes are physically processed within a building, it is not considered high winds would significantly impact operations. Doors / access to the building would remain closed where possible.
- d) The secure external storage of batteries in weather-proof / sealed containers means waste being stored is not at risk of becoming loose from high winds.

DROUGHTS/WARM, DRY WEATHER

- e) More frequent checks will be undertaken of waste storage areas to check for early signs of combustion.

DENSE FOG (POOR VISIBILITY)

- f) The operator will reduce operational intensity in conditions of poor visibility such as dense fog to reduce the risk of vehicle collisions or other potential accidents.

6.6 Conclusion

- 6.6.1 The options to mitigate and adapt to climate change are also limited. The options identified in this section are considered to be proportionate, practicable and deliverable and it is considered this site would not be affected by climate change or adverse weather conditions.

7 Training for Site Staff

7.1 Training needs assessment

- 7.1.1 All new and existing site staff are subject to a specific training regime based on their responsibilities at the site to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.
- 7.1.2 An employee training record (i.e. WORK/RF/6 in Appendix II) shall provide a comprehensive checklist for the training needs of all new site staff and also serves as a training review for existing site staff which will be carried out annually or a period set at the operator's preference.

7.2 Site rules and infrastructure training

- 7.2.1 This information is provided to all employees, visitors and contractors with a full understanding of the site's conditions of use, which is communicated and documented at induction for all staff with specific induction for visitors and contractors.
- 7.2.2 Competency should be demonstrated within this field to ensure the employee is fully aware of the site's surroundings and operations to ensure their safety and compliance with specific operating conditions at the site.

7.3 Emergency procedures training

- 7.3.1 All employees are required to be familiar with the Environmental Controls in Section 4.0 and the Emergency Procedures as detailed in the Section 5.0.
- 7.3.2 In addition to normal operating conditions as specified in the site rules, employees must also be trained in dealing with eventualities which may occur outside the scope of normal operating conditions, so they are aware of how to deal with these situations in advance of an occurrence.

7.4 Fire safety / firefighting training

- 7.4.1 Management must provide all employees with appropriate fire safety training with regard to their individual responsibilities.
- 7.4.2 Emergency procedures detailing what measures employees should adopt should a fire occur at the site are detailed in Section 5.2 and are covered by the 'emergency procedures' training (see Section 7.3).
- 7.4.3 Regular fire drills are undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs. These will be unannounced drills and will not form part of the induction or review training as specified in Section 7.1.

7.5 Recognition of waste types training

- 7.5.1 All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the sites EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who

should, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal.

- 7.5.2 Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production in accordance with acceptance procedures in Section 3.0. They will be trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

7.6 Storage areas / limits training

- 7.6.1 Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure that waste storage operations comply with the requirements of the EP for the site.
- 7.6.2 Employees in these roles must also be trained to recognise storage limits to ensure that they are in accordance with those specified in Section 3.5 and Appendix IV of this EMS.

7.7 Plant preventative maintenance training

- 7.7.1 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human health.
- 7.7.2 Training will be in accordance with this document and will be based on the preventative maintenance schedule supplied by the plant/equipment manufacturer.
- 7.7.3 The same training will be provided to senior management enabling a dual-level maintenance programme.

7.8 Duty of care training

- 7.8.1 All employees dealing with consignments of waste are trained in the completion of Duty of Care Waste Transfer Notes and the appropriate auditing of destination sites and/or contractors to ensure compliance.

7.9 Permit / management System

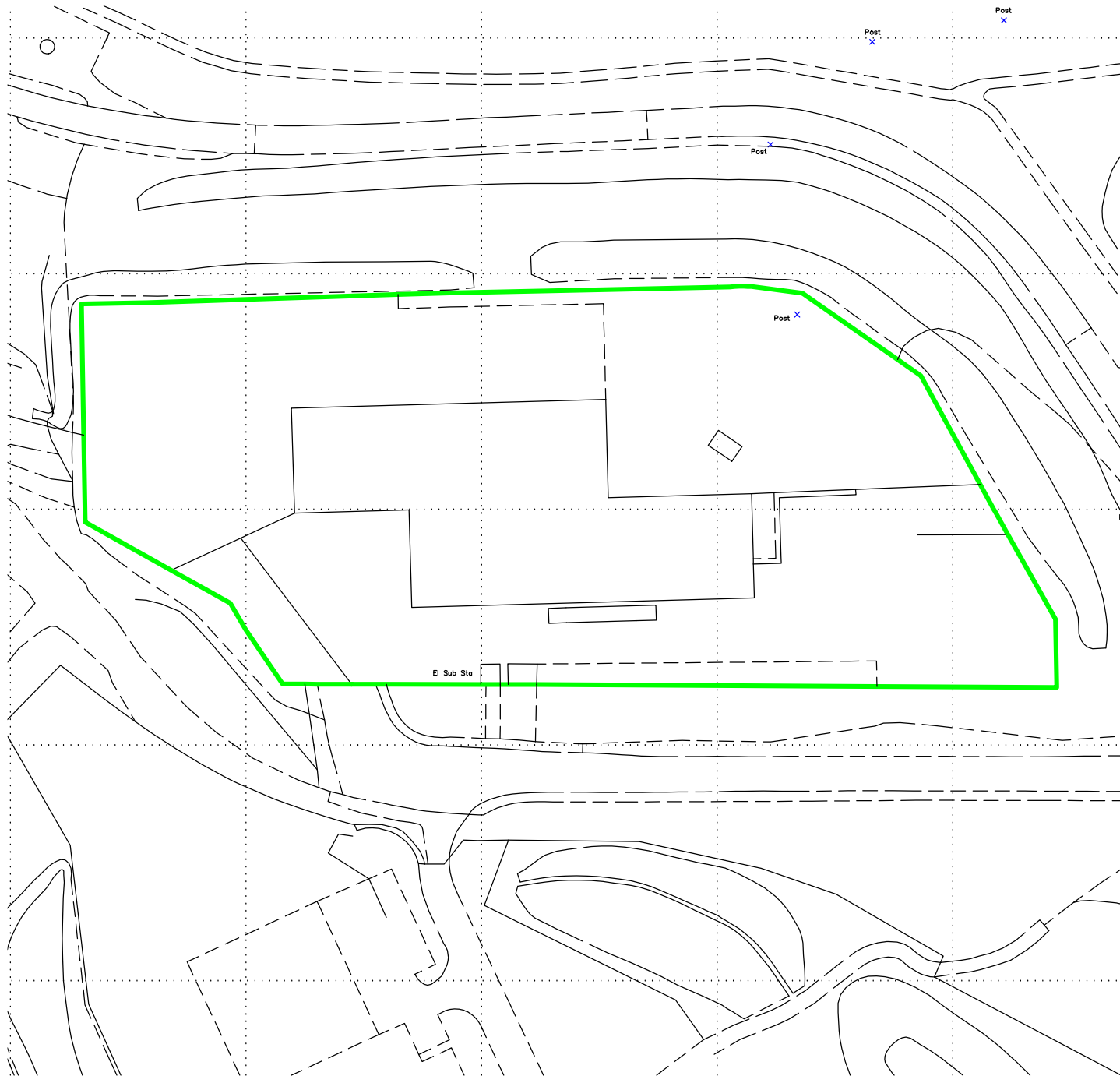
- 7.9.1 All employees will be inducted into the operating conditions as prescribed in the EP for the site. Whilst much of the above training will provide specific guidance on many aspects of these documents, all employees will be made aware of the location of the EP and EMS in the site office. All managerial positions will be made fully aware of the sites operating conditions.

7.10 Training for contractors

- 7.10.1 General site training will be provided to any contractors who are working on the site on a temporary basis as described in Sections 7.2, 7.3 and 7.4 above.
- 7.10.2 Additional training will be provided to contractors in their area of expertise. If they are dealing with specific items of plant/machinery, site operating conditions and a general understanding of the EP conditions will be provided to prevent any adverse impacts on the environment.

Appendix I

Drawings



NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	22.01.25	JH	Initial drawing

KEY:

— Permit boundary

N

Scale Bar (1:1,250)

TITLE:

PERMIT BOUNDARY PLAN

CLIENT:

Recycling Lives Compliance Services Limited

PROJECT/SITE:

Recycling Lives Services Workington, Isabella Road, Workington, Cumbria CA14 2JS

SCALE @ A4:	CLIENT NO:	JOB NO:
1:1,250	3421	002

DRAWING NO:	REV:	STATUS:
WORK-3421-02	-	Issued

DATE:	DRAWN:	CHECKED:
22.01.25	JH	CP

Oaktree Environmental
Waste, Planning & Environmental Consultants

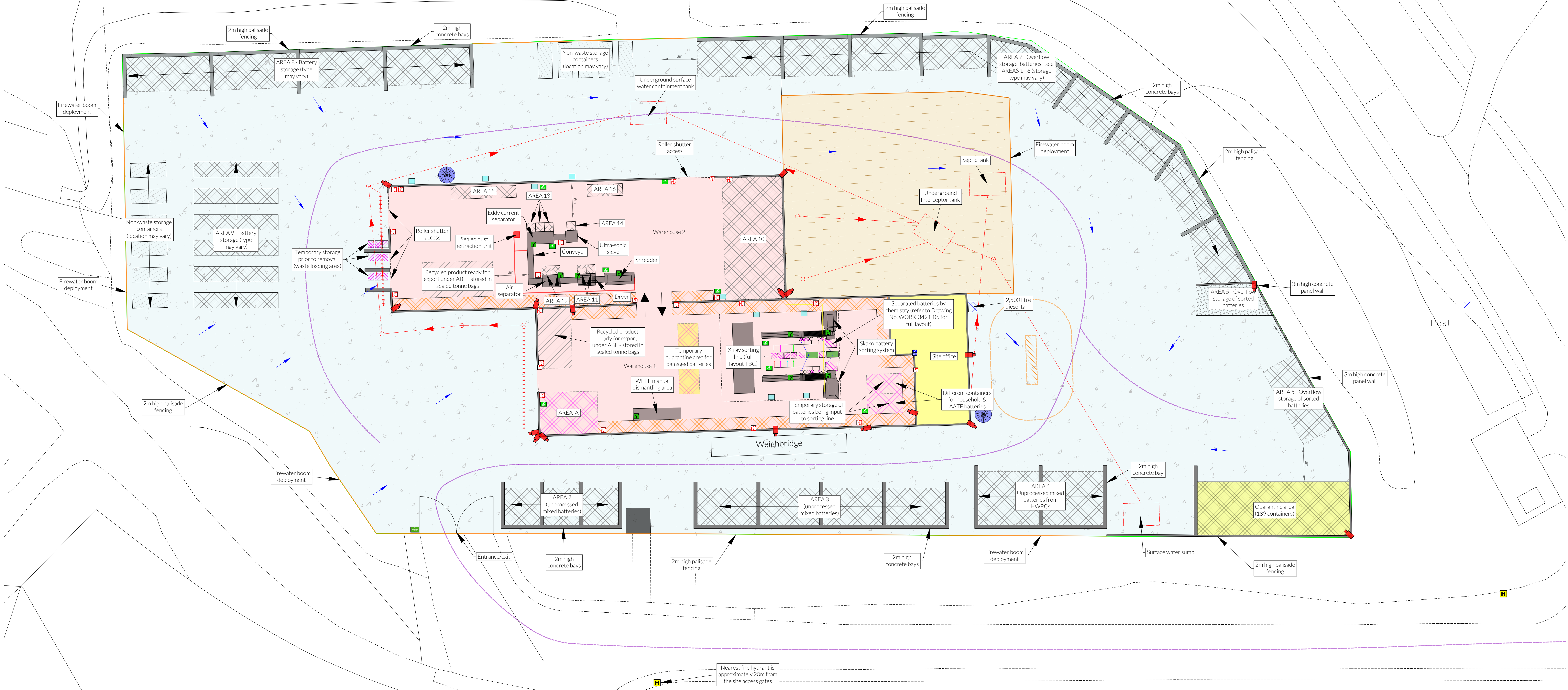
NOTES
Drawing for indication only. All dimensions in millimetres (mm) unless otherwise specified. This drawing is copyright and property of Oaktree Environmental Ltd.

REVISION HISTORY

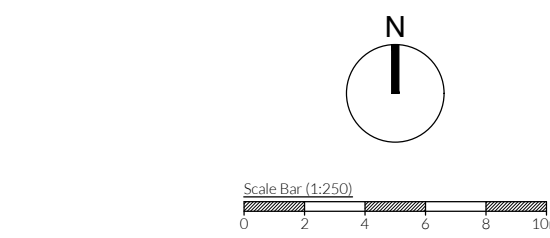
Rev:	Date:	Int:	Description:
-	01.04.25	JH	Initial drawing
A	23.04.25	JH/CP	Client comments
B	23.04.25	EG	Client comments
C	19.05.25	EG	Waste storage table amendments
D	13.06.25	EG	Application copy
E	23.09.25	EG	EA comments

KEY:

- Permit boundary
- Waste storage areas
- Non-waste storage areas
- Temporary storage/holding areas
- Non-waste fuel fluids
- Pedestrian walkway
- Impermeable surfaced areas
- Hardstanding areas
- Waste recycling/ storage buildings (impermeable surfaced floor)
- Office/welfare
- Out of hours plant storage
- 300mm thick solid concrete wall
- 600mm thick interlocking concrete lego block
- Quarantine area
- Firefighting equipment/extinguishers (indicative locations)
- Salvage solution drum for lithium batteries
- Fire alarms (indicative locations)
- Spill kits (indicative locations)
- Plant shut off
- Mains Water
- Access route for emergency services
- Fire hydrant
- Fire assembly points
- Pan/Tilt & zone cameras with 360/50cm coverage
- Surface water fall direction
- Underground contaminated (potentially contaminated surface water)
- ACO surface drain
- Treated (clean) surface water
- Manholes (clean/contaminated)
- Location of penstock valve to shut off drainage system
- Water storage tanks (indicative locations)
- Firewater polyboom deployment



Storage Area Details												
Plan Ref	Description	Storage type / container	Max width of pile (m)	Max length of pile (m)	Max height of pile (m)	Approx. area (m2)	Conversion factor used	Approx. volume (m3)	Approx. no. of pallets / containers	Approx. tonnage	Maximum storage duration	Comments
AREA A	Battery checking and inspection area prior to sorting and treatment	Sealed acid-resistant containers (dolav pallet boxes)	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	Maximum 48 containers	38.5 tonnes (800kg per container)	<12 hours	Containers are initially inspected here to check for any non-conforming items prior to storage in the yard before processing. Battery boxes will not be stacked. No waste is stored here outside of operational hours
AREA 2	Unprocessed mixed batteries	Sealed acid-resistant containers (dolav pallet boxes) with weatherproof covering	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 containers per bay	38.5 tonnes (800kg per container)	<12 months	Containers are stored within bays stacked two containers high. All containers will be stored so they are accessible from at least one side.
AREA 3	Unprocessed mixed batteries from AATF's	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 containers per bay	38.5 tonnes (800kg per container)	<12 months	As above
AREA 4	Unprocessed mixed batteries from HWRCs	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	224 containers	179 tonnes (800kg per container)	<12 months	As above
AREA 5	Overflow storage area for sorted batteries (by chemistry)	Recycled batteries stored in tonne bags on pallets with tarpaulin placed over each pallet	1 (per pallet)	1.2 (per pallet)	1	1.2 (per pallet)	1	1 per pallet	84 pallets (84 bags)	84 tonnes (1 tonne per bag)	<12 months	Batteries stored will have been sorted by chemistry and stored in tonne bags on pallets ready for despatch. Sorted batteries stored in the yard will have tarpaulin placed over them
AREA 6	Overflow storage area for sorted batteries (by chemistry)	Recycled batteries stored in tonne bags on pallets with tarpaulin placed over each pallet	1 (per pallet)	1.2 (per pallet)	1	1.2 (per pallet)	1	1 per pallet	84 pallets (84 bags)	84 tonnes (1 tonne per bag)	<12 months	As above
AREA 7	Overflow storage batteries - see AREAS 1 - 6 (storage type may vary)	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	150 containers	100 - 120 tonnes 800kg per container)	<12 months	As above
AREA 8	Battery storage (storage type may vary)	Depending on the battery type unprocessed batteries will be stored in either dolav boxes, barrels or tonne bags.	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	72 pallets (648 barrels or 72 containers)	24.6 - 72 tonnes (342kg per pallet of barrels or 800kg per container)	<12 months	Batteries will either have been sorted by chemistry or unsorted and awaiting processing.
AREA 9	Battery storage (storage type may vary)	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 pallets per row (432 barrels or 48 containers)	16.4 - 48 tonnes per row (342kg per pallet of barrels or 800kg per container)	<12 months	As above
AREA 10	Processed / sorted batteries for shredding (sorted by chemistry)	Sorted batteries stored in pallet boxes awaiting shredding	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	170 containers	136 tonnes (800kg per container)	<12 months	Batteries will have been sorted by chemistry and are awaiting further processing via shredding
AREA 11	Electrolyte & volatiles	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	2 containers	1 tonne per container	<12 months	Container moved to AREA 14 when at capacity and replenished with empty container
AREA 12	Paper & plastic	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	2 containers	1 tonne per container	<12 months	As above
AREA 13	Ferrous metal, aluminium, copper	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	3 containers	1 tonne per container	<12 months	As above
AREA 14	Zinc / Manganese powder (black mass)	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	1 container	1 tonne per container	<12 months	As above
AREA 15	Dismantled WEEE	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	5 containers	1 tonne per container	<12 months	Containers replenished with empty ones when full / removed
AREA 16	Overflow storage from shredding line (contents may vary)	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	5 - 10 containers	1 tonne per container	<12 months	Containers replenished with empty ones when full / removed



TITLE:
SITE LAYOUT & FIRE PLAN

CLIENT:
Recycling Lives Compliance Services Limited

PROJECT/DATE:
Recycling Lives Services Workington, Isabella Road,
Workington, Cumbria, CA14 2JS

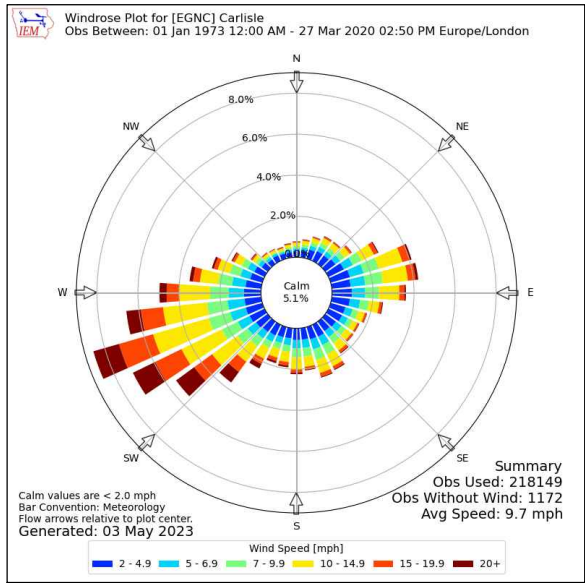
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1:250 3421 002

DRAWING NO: REV: STATUS:
WORK-3421-03 E Issued

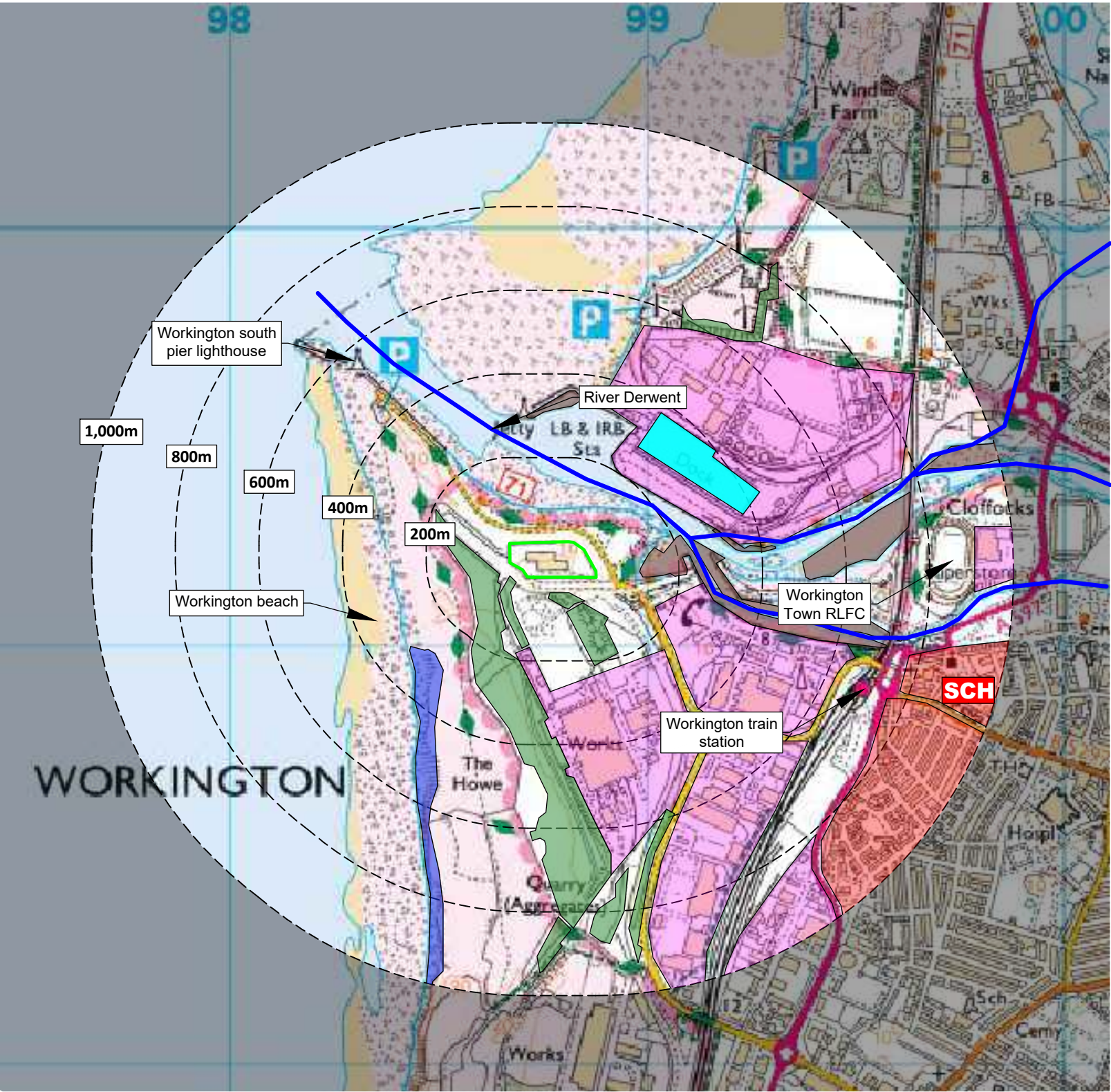
DATE: DRAWING: CHECKED:
23.09.25 JH/CP/EG RL

KEY:

- Permit boundary
- Main river
- Surface water body (river / stream / pond / pool / lake)
- Areas with mix of residential, retail and commercial properties
- Workplaces (includes agriculture industry, commerce and retail)
- Residential blocks
- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- Schools
- Woodland areas
- Priority Habitat Inventory - Saline Lagoons
- Priority Habitat Inventory - Mudflats
- Priority Habitat Inventory - Maritime Cliffs & Slopes
- Priority Habitat Inventory - Deciduous Woodland



Compass Wind Rose for (EGNC) Carlisle Period
1973-2020
- source: Iowa State University

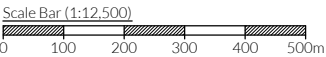
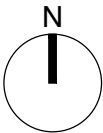


NOTES

- Boundaries are shown indicatively.
 - Wind rose data shows the prevailing wind direction to be Southerly.
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REVISION HISTORY

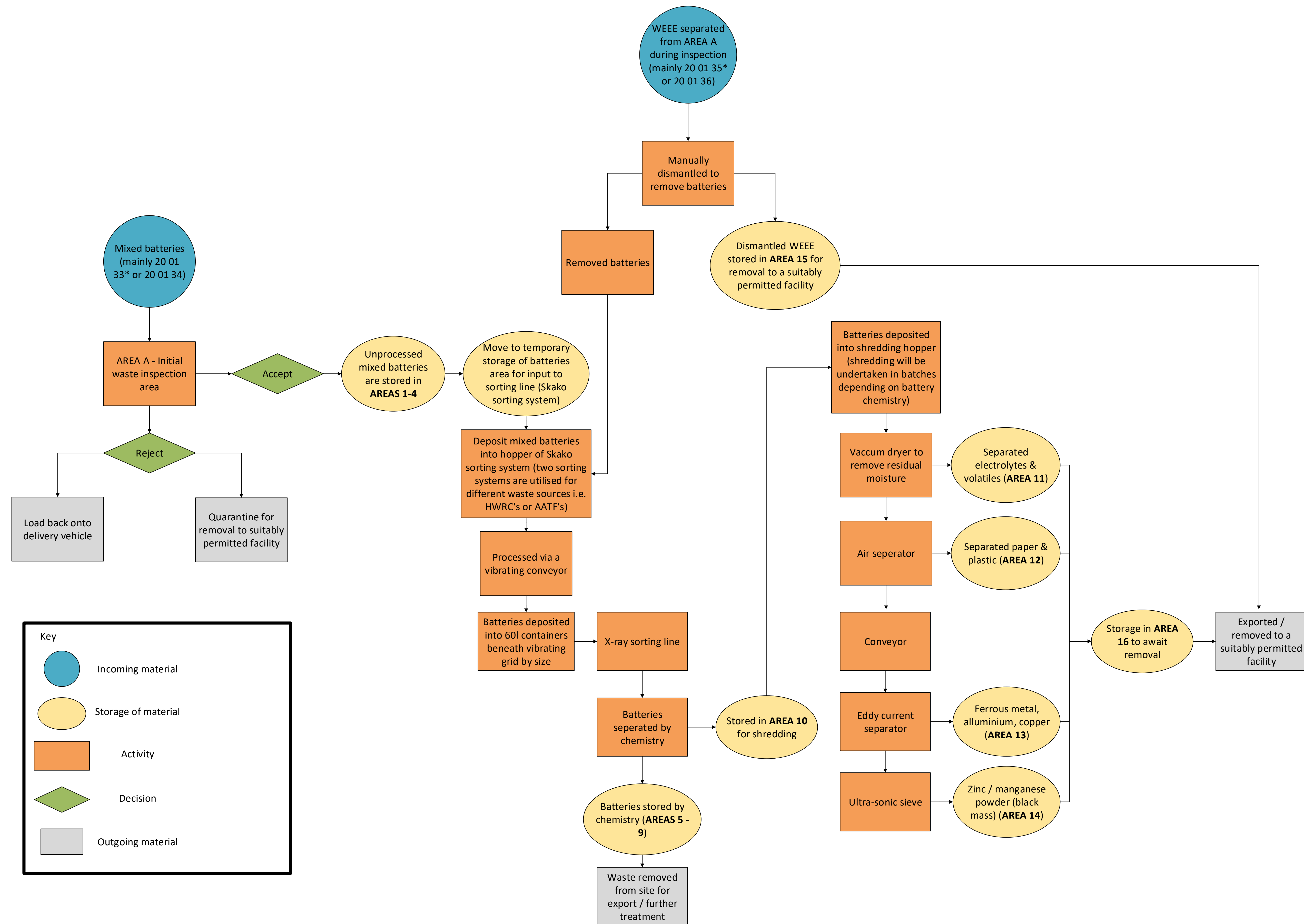
Rev:	Date:	Init:	Description:
-	22.01.25	JH	Initial drawing



TITLE: RECEPTOR PLAN		
CLIENT: Recycling Lives Compliance Services Limited		
PROJECT/SITE: Recycling Lives Services Workington, Isabella Road, Workington, Cumbria CA14 2JS		
SCALE @ A3: 1:12,500	CLIENT NO: 3421	JOB NO: 002
DRAWING NO: WORK-3421-04	REV: -	STATUS: Issued
DATE: 22.01.25	DRAWN: JH	CHECKED: CP



Hazardous Battery Waste Treatment Process Flow Diagram - Drawing No. WORK/3421/05



Appendix II

Record Keeping Forms

RECYCLING LIVES COMPLIANCE SERVICES LIMITED
REJECTED WASTE - RECORD FORM WORK/RF/2

DATE	
TIME	
WASTE DESCRIPTION	
QUANTITY OF WASTE	
PRODUCER/HOLDER'S NAME, ADDRESS & TELEPHONE No.	
NAME OF CARRIER	
VEHICLE REGISTRATION	
CARRIER REG. No.	
REASON FOR REJECTION OF WASTE	
ACTION TAKEN	

RECYCLING LIVES COMPLIANCE SERVICES LIMITED			
DAILY INSPECTION CHECKLIST - WORK/RF/2			
DATE			
ITEM FOR VISUAL INSPECTION ↓	TIME OF INSPECTION (START)	CHECKED Y/N	REMEDIAL ACTION REQUIRED
	TIME OF INSPECTION (FINISH)		
EMERGENCY ACCESS (FREE FROM BLOCKAGES)			
COMBUSTIBLE WASTE STORAGE (AWAY FROM POTENTIAL IGNITION SOURCES)			
FIRE WATCH AT THE END OF THE WORKING DAY TO INSPECT FOR SIGNS OF SELF-HEATING, SMOKE OR FIRE AND ENSURE EXHAUSTS ON PLANT ARE COOL ETC			
DUST/FLUFF AROUND UNIT CHECK			
LITTER (I.E. LOOSE COMBUSTIBLE WASTE MATERIALS)			
PLANT/EQUIPMENT MAINTENANCE CHECKS (BEFORE AND AFTER USE)			
FIRE QUARANTINE AREA IS CLEAR OF WASTE			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			
CHECKED BY		SIGNATURE	
POSITION		DATE	
<i>Sheet</i>		<i>of</i>	

RECYCLING LIVES COMPLIANCE SERVICES LIMITED			
WEEKLY INSPECTION CHECKLIST - WORK/RF/3			
WEEK COMMENCING			
ITEM FOR VISUAL INSPECTION ↓	TIME OF INSPECTION (START)	CHECKED Y/N	REMEDIAL ACTION REQUIRED
	TIME OF INSPECTION (FINISH)		
SITE SECURITY (CCTV SYSTEM IS WORKING, FENCING AROUND SITE PERIMETER IS IN GOOD CONDITION, LOCK ON GATED ENTRANCE IS WORKING)			
WASTE STORAGE AREA (NOT EXCEEDING THE DIMENSIONS INCLUDED IN THE FIRE PREVENTION PLAN)			
WEATHER FORECAST (CHECK FOR UPCOMING WEEK TO DETERMINE IF WASTE OPERATIONS ARE LIKELY TO BE IMPACTED)			
FIRE FIGHTING EQUIPMENT AND SPILL KITS E.G. FIRE EXTINGUISHERS ARE IN PLACE AND FULLY STOCKED			
INTEGRITY OF CONCRETE WALLS / BAYS (NO CRACKS ETC)			
INTEGRITY OF IMPERMEABLE PAD (NO CRACKS ETC)			
INTEGRITY OF WATER STORAGE TANKS (NO LEAKS OR CRACKS ETC)			
INTEGRITY OF DRAINAGE SYSTEM (FUNCTIONING CORRECTLY)			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			
CHECKED BY		SIGNATURE	
POSITION		DATE	
SHEET		OF	

RECYCLING LIVES COMPLIANCE SERVICES LIMITED			
MONTHLY INSPECTION CHECKLIST - WORK/RF/4			
WEEK COMMENCING			
ITEM FOR VISUAL INSPECTION ↓	TIME OF INSPECTION (START)	CHECKED Y/N	REMEDIAL ACTION REQUIRED
	TIME OF INSPECTION (FINISH)		
HOSES AVAILABLE ON SITE AND FREE FROM HOLES (IN GOOD WORKING CONDIITON)			
INTEGRITY OF WATER TANKS (FREE FROM CRACKS / IMPERFECTIONS AND SECURE)			
ELECTRICALS (WIRES SHOULD NOT BE FRAYED / DAMAGED AND SOCKETS NOT OVERLOADED)			
FIREWATER BOOMS AVAILABLE			
CAPACITY OF INTERCEPTOR TANKS			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			
CHECKED BY		SIGNATURE	
POSITION		DATE	
SHEET		OF	

RECYCLING LIVES COMPLIANCE SERVICES LIMITED

EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW - WORK/RF/6

EMPLOYEE NAME				DATE COMPLETED			
POSITION				REVIEW DUE			
TRAINER				OUTCOME	PASSED		
POSITION					FURTHER TRAINING REQUIRED		
CARRIED OUT /SIGN OFF >	Y/N	SIGNED BY EMPLOYEE	SIGNED BY TRAINER		Y/N	SIGNED BY EMPLOYEE	SIGNED BY TRAINER
ENVIRONMENTAL PERMIT				FIRE PREVENTION PLAN			
MANAGEMENT SYSTEM				FIRE SAFETY			
SITE RULES				EMERGENCY PROCEDURES			
RECORD KEEPING / TRANSFER NOTES				STORAGE /PILE SIZE LIMITS			
RECOGNITION OF WASTE TYPES				STORAGE DURATION			
SECURITY				FIRE DETECTION			
VEHICLE CHECKS				FIRE ALARMS			
PLANT OPERATION				FIRE FIGHTING EQUIPMENT			
PLANT CHECKS				FIRE WATER CONTAINMENT MEASURES			
AMENITY - LITTER, ODOUR, PESTS etc.				SPILL CLEARANCE			
NOTES AND ACTIONS:							

RECYCLING LIVES COMPLIANCE SERVICES LIMITED COMPLAINTS REPORT FORM (WORK/RF/7)

Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form WORK/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

- 1) The name, address and telephone number of the caller will be requested.
- 2) Each complaint will be given a reference number.
- 3) The caller will be asked to give details of:
 - a) the nature of the complaint;
 - b) the time;
 - c) how long it lasted;
 - d) how often it occurs;
 - e) Is this the first time the problem has been noticed; and
 - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:
 - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - b) strength and direction of the wind; and
 - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report.
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the Environment Agency and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.

Appendix III

Environmental Permit

Appendix IV

Health & Safety – Conditions of Site Use

HEALTH AND SAFETY - CONDITIONS OF SITE USE

The following guidelines apply to all site personnel, contractors and visitors using the site (where applicable).

- 1) The site is covered by the Health and Safety at Work Act 1974 and its associated regulations and all users must abide by any relevant provisions. Any person found to be in contravention of the requirements of this Health and Safety Statement will be asked to leave the site.
- 2) All visitors and contractors must sign the visitor's book upon entry to and exit from the site. All vehicle drivers must report to the office and await instruction from the site manager/deputy before proceeding to deposit waste at the site.
- 3) All accidents, diseases, injuries or dangerous occurrences shall be reported to the site manager. All instructions issued by the site manager in respect of health and safety at the site must be followed by all site users.
- 4) A first aid box (including eye-wash bottles) is kept in the site office. If you are injured on site please alert a member of staff/trained first-aider for assistance.
- 5) All persons must wear the appropriate PPE on site including high visibility jackets and hard hat.
- 6) Safety boots must be worn by all persons in the waste sorting/storage areas.
- 7) Protective gloves must be worn for any operations which present a hazard of puncture to or laceration of the skin or for any manual handling work carried out on site.
- 8) Ear defenders, safety helmets (hard hats) and eye protection will be issued when deemed necessary and must be worn by all employees and contractors where required by the site manager or other site representatives.
- 9) Fire extinguishers are kept on site to deal with any fires - fires shall only be dealt with by employees of Recycling Lives Compliance Services Limited unless alternative instructions are given by the site manager. Access to fire exits and firefighting equipment must be kept clear at all times. When the fire alarm sounds please follow instructions and leave the site in an orderly fashion.
- 10) Persons who are suspected to be under the influence of drugs or alcohol will be removed from the site.
- 11) Smoking is not permitted on the site.
- 12) Observe and follow all traffic directions and traffic/safety signs.
- 13) Drivers must comply with all safety instructions given by the site manager or appointed deputy.
- 14) All drivers are responsible for ensuring that their vehicle is safely loaded. Unsafe loads will not be accepted at the site and will not be allowed to leave the site until they have been made safe.
- 15) Drivers waiting to deposit waste at the site shall follow the instructions of the operator and shall only unload waste in the designated area, unless advised otherwise.
- 16) Drivers must remain in the cab or stand well clear of the vehicle during loading or unloading. Once the vehicle has been loaded it must be securely sheeted (if necessary) before leaving the site. When sheeting and unsheeting the vehicle ensure that the engine is switched off, the ignition key removed and the parking brake is on. Do not gain access using the mudguards and wheels. Ensure that your ropes, hooks and sheets are in good condition.
- 17) Never travel with the vehicle body raised. Ensure you know the maximum height of the raised body of your vehicle.

Declaration: To be completed by site users

I have read and understand the conditions of use for this site and agree to comply with them at all times. I accept that neither Recycling Lives Compliance Services Limited nor their employees shall be liable for any loss or injury arising from my non-compliance with the above conditions.

Signed.....

Print name.....

Company/Organisation.....

Date.....

Note: these conditions are included in the EMS for information only and may be revised regularly as part of the site health and safety policy.