EUROPEAN METAL RECYCLING LIMITED
NEWMARKET

EPR/LB3403FG

ENVIRONMENTAL MANAGEMENT PLAN

111 Fordham Road
Snailwell
Newmarket
CB8 7ND

January 2023

EMR SHE Manager	EMR SHE Specialist
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Introduction

The following Environmental Management Plan or EMP (formerly Working Plan) has been produced by European Metal Recycling hereafter referred to as EMR to support the Environmental Permit EPR/LB3403FG for EMR Newmarket, 111 Fordham Road, Snailwell, Newmarket, CB8 7ND operated as a Metal Recycling Site (MRS) submitted to the Environment Agency here after referred to as EA. The content of this Environmental Management Plan and the assessments contained within have been produced based on the requirements as set out in the EA guidance documents: 'How to comply with your Environmental Permit' guidance and specification document 2010, formerly Working Plan Guidance.

EMR Newmarket here after referred to as (the site) is situated at grid reference TL63533 68002. The site possesses an Environmental Permit: EPR/LB3403FG (formerly EAWML70159 and SY003) originally issued on 4th June 2014 to Mayer Parry Recycling Ltd (a registered company of EMR since 1999) and originally issued (as a waste management license) by Cambridgeshire County Council on 16th December 1992 to Mayer Parry Recycling Limited. The permit was varied in June 2014 to EPR/EP3490NE/V005 and then again in September 2022 to EPR/LB3403FG (European Metal Recycling Ltd). The site also possesses a number of permit exemptions (as part of a bulk exemption and these include S2 Storage and T9 treatment permit exemptions.

Prior to this the site was operated as a number of different type of facilities as outlined as follows. Pre-1948 the Newmarket site was used as a tannery but from 1948 the site has been operated as a scrap metal yard (with associated related processes); companies which owned and operated the business before EMR (beginning with earliest) were: Knappetts, A King and Sons Ltd, Scargills, Mayer Newman (East Anglia) Ltd and Mayer Parry Recycling Ltd who took over the site in 1990 (Mayer Parry was purchased in its entirety by EMR in 1999).

The permit authorises the keeping and treating of scrap metal and waste.

The companies registered office is:

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

Registered in England and Wales No. 2954623

SECTION 1 – Site Description and Characterisation of Risk Source

1.1 Specified Site and Waste Management Operations

The operations comprises the recycling of metals and metal compounds and storage of wastes pending any of the operations numbered R1 to R13 (excluding temporary storage, pending collection, on the site where it is produced). This includes:

a. **Storage**: Storage of wastes including end of life vehicles.
b. **Checking**: Checking wastes and rejection of wastes excluded from the environmental permit.
c. **Processing**: Processing wastes (e.g. sorting, baling, stripping, cutting, shearing, dismantling, shredding, separation, breaking) and processing of end of life vehicles in accordance with ELV regulations.
d. **Storage**: Storage of processed materials.

Table 1 - Specified waste management operations

Specified waste management operation (schedule 4 'R' classification codes)	**Types of waste which may be subject to the specified operation***
R4: Recycling or reclamation of metals and metal compounds.	Ferrous metal scrap, non-ferrous metal scrap, mixed scrap, materials from secondary recovery produced when processing scrap metals (see table 3 for full list of potential EWC codes).
R5: Recycling or reclamation of other inorganic materials.	Ferrous metal scrap, non-ferrous metal scrap, mixed scrap, materials from secondary recovery produced when processing scrap metals and WEEE (see table 3 for full list of potential EWC codes).
R13: Storage of waste consisting of materials intended for submission to any operations numbered R1 to R12, but excluding temporary storage pending collection.	Ferrous metal scrap, non-ferrous metal scrap, mixed scrap, materials from secondary recovery produced when processing scrap metals (see table 3 for full list of potential EWC codes).

1.2 Permitted Wastes

Site activities are focused on the import, storage, processing and export of processed metal materials. The total quantity of waste accepted at the site across all activities **shall not exceed 250,000 tonnes per annum.**

Exclusions: Wastes having any of the following characteristics shall not be accepted:

- Consisting solely or mainly of dusts, powders or loose fibres.

Permitted wastes are detailed in the permit under Schedule 1 operations and are as follows:

Table S1.1 activities		
Activity Reference	**Description of Activities for waste operations**	**Limits of activities**
A1: Vehicle storage, depollution and dismantling (authorised treatment facility)	**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 materials **R13**: Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	Treatment operations shall be limited to: • Treatment consisting only of depollution of waste motor vehicles and sorting , separation, grading, baling, shearing, compacting, crushing or cutting of waste into different components for recovery of wastes. • All wastes shall be treated on an impermeable surface with sealed drainage system. Storage operations shall be limited to: • Except for waste motor vehicles, the maximum quantity of hazardous waste and waste oils (in aggregate) that can be stored at the site shall not exceed 50 tonnes at any one time. • Wastes shall be stored for no longer than 3 years prior to recovery. • No more than 50 tonnes of intact waste vehicle tyres (waste code 16 01 03) shall be stored at the site. • Uncontaminated plastic, glass and ferrous and non-ferrous metal wastes (including depolluted waste motor vehicles) arising from the treatment of end of life vehicles shall be stored on hard standing or an impermeable surface with sealed drainage system. All other wastes shall be stored on an impermeable surface with sealed drainage system. • Lead acid batteries shall be stored in containers with an impermeable, acid resistant base and a lid to prevent ingress of water. Buildings, covered areas or containers shall meet the following requirements: • Buildings, covered areas or containers shall be designed , constructed and maintained to prevent ingress of rain and surface water; • Rain and uncontaminated surface water

		shall be kept separate from contaminated water and other liquids; • Containers containing waste (excluding uncontaminated metal waste) shall be stored on an impermeable surface with sealed drainage system.
A2 Waste electrical and electronic storage	**R13:** Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)	There shall be **no** treatment of WEEE. Storage operations shall be limited to: • Except for WEEE awaiting manual dismantling, repair or refurbishment only, the maximum quantity of hazardous waste that can be stored at the site shall not exceed 50 tonnes at any one time. • WEEE, disassembled spare parts, components or residues shall be stored on an impermeable surface with sealed drainage system with provision of spillage collection facilities and, where appropriate, decanters and cleanser degreasers; • WEEE, disassembled spare parts, components or residues shall be stored in areas provided with a weatherproof covering where appropriate or in containers providing a weatherproof covering where appropriate; • Disassembled spare parts containing liquids shall be stored in appropriate containers; • Batteries, PCBs/PCTs containing capacitors and other hazardous wastes must be stored in a dedicated, labelled and appropriate containers. Buildings, covered areas or containers shall meet the following requirements: • Buildings, covered areas or containers shall be designed , constructed and maintained to prevent ingress of rain and surface water; • Rain and uncontaminated surface water shall be kept separate from contaminated water and other liquids; • Containers containing waste shall be stored on an impermeable surface with

		sealed drainage system.
A3 Metal Recycling	**R4:** Recycling / reclamation of metals and metal compounds **R13:** Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	Treatment operations shall be limited to: • Treatment consisting only of sorting, separation, grading, shearing, baling, compaction, crushing, granulation or cutting of non-hazardous waste into different components for recovery. • There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes. • All wastes shall be treated on an impermeable surface with sealed drainage system. Storage operations shall be limited to: • The maximum quantity of hazardous waste and waste oils (in aggregate) that can be accepted or stored at the site shall not exceed 50 tonnes at any one time. • Wastes shall be stored for no longer than 3 years prior to recovery. • Uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal wastes shall be stored on hard standing or an impermeable surface with sealed drainage system. All other wastes shall be stored on an impermeable surface with sealed drainage system. • Lead acid batteries shall be stored in containers with an impermeable, acid resistant base and a lid to prevent ingress of water. Buildings, covered areas or containers shall meet the following requirements: • Buildings, covered areas or containers shall be designed , constructed and maintained to prevent ingress of rain and surface water; • Rain and uncontaminated surface water shall be kept separate from contaminated water and other liquids; • Containers containing waste (excluding uncontaminated metal waste) shall be stored on an impermeable surface with

		sealed drainage system.
A4: Plastic Recycling	**R5**: Recycling / reclamation of other inorganic materials **R13**: Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	Treatment operations shall be limited to: • Treatment consisting only of sorting, separation, screening, shredding, baling, compaction or crushing of non-hazardous waste into different components for recovery. Storage operations shall be limited to: • Wastes shall be stored for no longer than three years.

The European Waste Catalogue (EWC) codes that cover materials accepted are listed in Table 3 as follows: (see references below)

Table 3 – EWC Codes for permitted wastes that may be accepted at the site

SCHEDULE OF EUROPEAN WASTE CODES

02 WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01 wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10 waste metal
10 – Wastes from thermal processes
10 02 10 Mill Scales (ferrous and non-ferrous)
10 03 02 anode scraps
10 08 14 anode scrap
11 – Wastes from Chemical Surface Treatment and Coating of Metals and other Materials; Non-Ferrous Hydro-Metallurgy
11 05 01 hard zinc
11 05 02 zinc ash
12 WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01 wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01 ferrous metal filings and turnings
12 01 02 ferrous metal dust and particles
12 01 03 non-ferrous metal filings and turnings
12 01 04 non-ferrous metal dust and particles
12 01 13 welding wastes
15 WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER
MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01 packaging (including separately collected municipal packaging waste)
15 01 02 plastic packaging
15 01 04 metallic packaging
16 WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01 end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06

and 16 08)
16 01 03 end-of-life tyres
16 01 04 end-of-life vehicles*
16 01 06 end-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 07 oil filters*
16 01 11 brake pads containing asbestos*
16 01 12 brake pads other than those mentioned in 16 01
16 01 17 ferrous metal
16 01 18 non-ferrous metal
16 01 22 components not otherwise specified (comprising only of depolluted metallic vehicle parts, components and engines)
16 02 discarded equipment and its components
16 02 14 discarded equipment other than those mentioned in 16 02 09 to 16 02 13 (ferrous and non- ferrous metal waste only)
16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15 (ferrous and non-ferrous metal waste only)
16 06 batteries and accumulators
16 06 01 Lead batteries*
16 06 02 Ni-Cd batteries
16 06 04 Alkaline Batteries
16 06 05 other batteries and accumulators
17 CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02 03 Plastic
17 04 metals (including their alloys)
17 04 01 copper, bronze, brass
17 04 02 Aluminium
17 04 03 Lead
17 04 04 Zinc
17 04 05 iron and steel
17 04 06 Tin
17 04 07 mixed metals
17 04 11 cables other than those mentioned in 17 04 10

19 WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 01 wastes from incineration or pyrolysis of waste
19 01 02 ferrous materials removed from bottom ash
19 10 wastes from shredding of metal-containing wastes
19 10 01 iron and steel waste
19 10 02 non-ferrous waste
19 10 04 fluff light fraction and dust other than those mentioned 19 10 03
19 12 wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02 ferrous metal
19 12 03 non-ferrous metal
19 12 04 Plastic and rubber
19 12 12 metal wastes from mechanical treatment of waste
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 33 lead batteries*
20 01 39 Plastics
20 01 40 Metals *
20 01 36 Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35*

This list is anticipated to cover all eventual process materials that may be handled by EMR at the site it is considered to be the best fit to the existing environmental permit.

1.3 Permitted site boundary

See Appendix 5.

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

Day	Operating hours
Monday to Friday	06:30 – 22:00
Saturdays	08:00 – 14:00
Sundays and Public Holidays	Closed

Scrap metal may be received outside the above hours by prior arrangement with Cambridge County Council.

However site opening hours to customers and the general public are limited to:

Day	Opening hours
Monday to Friday	07:00 – 16:00
Saturdays	Closed
Sundays and Public Holidays	Closed

The site weighbridge is closed outside these hours.

1.5 Staff Competency and Training
The site will be staffed by person (s) who are Technically Competent and have undergone technical competency training or a technically competent person shall be available for the site. Certain relevant key staff (e.g. depot manager) will undertake CIWM WAMITAB / NVQ4 Qualification (or equivalent) or be scheduled to attend the relevant course.

1.6 Environmental Permit (and EMP)
The Environmental Permit (permit: EPR/LB3403FG) will be displayed in a prominent place (e.g. notice board) and replaced by a new copy if it is removed or is defaced in anyway.

The Depot Manager, the Technically Competent person and other key staff / supervisors will be familiar with the Environmental Permit and Working Plan and requirements.
If there are any significant changes in the operation of the site the Environment Agency will be informed (and the Environmental Permit may need to be varied).

Subject to any conditions within the Environmental Permit, prior written consent will be gained from the Environment Agency before any specific changes are made to the Environmental Management Plan (EMP).

1.7 Responsible Persons
If there are changes of depot manager, if the person responsible for managing day to day operations of the site is changed or the TCM status of the site manager changes the Environment Agency will be informed in writing.

SECTION 2 - SITE INFRASTRUCTURE

2.1 Provision of Site Identification Board

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

- Site Name & Address
- Environmental permit Holder Details
- Operators Details
- EMR Emergency Out of Hours Contact Numbers
- Opening Times
- Environmental permit No.
- Environment Agency Contact Numbers

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

2.2 Site security

The site will be adequately fenced to prevent unauthorised access. The offices will be located adjacent to the main weighbridges and where possible close to the site entrance, all entrance gates to the site will remain locked outside of operating hours.

A security guard will be employed to patrol the site outside normal operating hours. The security guard normally starts at 17:00 in the evening and finishes about 07:00 in the morning. In addition to on site security there is CCTV and motion sensor coverage across the site (monitored by Mitie) for fire detection and potential intruders.

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

All intrusion, defects, damage and repairs will be recorded in the site diary or the sites maintenance logs.

2.3 Lighting

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

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

Any light pollution will be minimised as far as reasonably practicable.

All defects, damage and repairs will be recorded in the site diary / log and the TCM Event / action log.

2.4 Warnings of Danger

Appropriate warning signs will be erected and displayed, warning non-operational personnel of danger on the site.

Any contractors employed to conduct work on the site will receive appropriate health, safety and environmental induction training which will include warning of potentially hazardous areas and activities on sites.

SECTION 3 - SITE ENGINEERING FOR POLLUTION PREVENTION AND CONTROL
3.1 Engineered site containment and drainage systems (includes effluent collection systems)

3.1.1 Impermeable Site Surfaces
All storage and treatment of scrap metal including end of life vehicles prior to processing shall be undertaken on an impermeable surface, comprising high specification concrete with reinforced construction, served by a sealed drainage system.

The impermeable surfaces will be maintained to prevent fluids running off to un-surfaced areas, and to prevent the transmission of fluids through the pavement or its construction joints.

Impermeable surfacing specification: the impermeable surface will comprise of a 200mm thick concrete CSO Fibrin - polypropylene fibre (to prevent shrinkage) with one layer of 252mm reinforced mesh spaced 50mm off the base of the concrete layer and underlain by a 1200 gauge membrane. The surface is constructed as separate slabs or bays with contraction and expansion joints and sealed with hot poured Pli-astic sealant.

3.1.2 Sealed Drainage Systems
The Newmarket site covers an area of approximately 26 acres, most of which will be covered by an impermeable concrete surface (as described above) that will encourage the rapid run-off of any rainfall. The site drainage system consists of 60 drains and catch-pits and two primary interceptors (plus an additional, with two sand filters immediately before the two primary discharge points.

Surface water from the site is collected in two drainage runs referred to as HMP and Pre-Sort.

Any surface run off from impermeable surfaces will pass through any one of five interceptors (depending on area water is draining from) prior to discharge:

HMP 1: Conder interceptor, situated just below main site weighbridge.
HMP 2: Conder interceptor situated at end of run collecting surface water from basic grades stores.
HMP 3: Conder interceptor (BCF2), prior to HMP discharge point.

Pre-sort 1: Conder interceptor (PCC3) adjacent to ELV shed.
Pre- sort 2: Conder interceptor (BGC2) prior to Pre-sort discharge point.

Two heavy media, two centurion, one Gladiator and one dust plant, use process water which is recycled by re-circulating on site. Much of the process water is either lost through evaporation or carried over by the processed material and is topped up by mains water as and when required. Therefore the vast majority of water discharged from the site comprises of rainwater surface runoff.

A wheel / screw operated penstock valve is located on both the HMP and Pre-sort drainage runs down stream of the final by-pass interceptors but upstream of the discharges to the tributary of the River Snail.

3.1.3 Site Discharge

The discharge will consist solely of trade effluent arising from the site drainage and the site has consents to discharge issued by the Environment Agency and comprises two discharge points:

HMP: Discharge to tributary of the River Snail at the site boundary outside the colour sort shed.

Pre-sort: Discharge to tributary of the River Snail at the site boundary adjacent to the Scansat shed.

The two consented surface water discharges from the site, referred to by the names of their main catchment areas are "HMP and "Pre-sort":

Discharge Consent *(HMP discharge)*: EA Consent number: PRCNF/054446A
Situated at NGR: TL 6367 6776; conditions:

i) shall not contain any poisonous, noxious or polluting or solid waste matter
ii) consist solely of trade effluent comprising site drainage
iii) shall not contain more than 50mg/l of suspended solids
iv) shall not contain more than 10mg/l of oil or grease
v) shall not cause any visible trace or oil or grease to appear on the surface of the receiving watercourse.

Discharge Consent *(Pre-sort discharge)*: EA Consent number: PR1NF/2058 at NGR: TL 637 679; conditions:

i) shall not contain any poisonous, noxious or polluting or solid waste matter
ii) consist solely of trade effluent comprising site drainage
iii) shall not contain more than 50mg/l of suspended solids
iv) shall not contain more than 10mg/l of oil or grease
v) shall not cause any visible trace or oil or grease to appear on the surface of the receiving watercourse.

Foul water discharge*:* foul water drains to cess pits located at the motorbike parking area. The cess pits are emptied by an approved and permitted contractor as and when required.

Adjacent water courses will be visually inspected on a daily basis for signs of any pollution. Any signs of pollution will be reported to the Environment Agency and action or preventative measures taken to prevent pollution.

Water samples will be taken from both HMP and pre-sort discharge outfalls (as outlined in the relevant EPP) and sent to MES (Mayer Environmental Services) for laboratory analyses (at UKAS accredited laboratories) to measure parameters and determine if they meet discharge consent requirements, described above.

[See EPP 3.5 Management & control drainage and surface water discharge]

3.1.4 Bunded Areas

Potentially contaminating liquids, such as fuels and oils shall be stored on site in appropriately engineered containers and bunds designed to a minimum 110% holding capacity for a single tank. Where two or more tanks are held within one secondary containment system or bund, the bund will hold at least 110% of the biggest tank's maximum storage capacity or 25% of the total maximum storage capacity of all the tanks, whichever is the greatest. All bunds will be constructed of materials impermeable to water and oil. All draw-off pipes and fill pipes that pass through the containment system sealed adequately. Engineered catch systems will be employed in areas where fluid spills may potentially occur.

3.1.5 Maintenance Schedules

Tanks and bunds are inspected monthly to ensure their continued integrity. Any defects observed will be made temporarily secure by the end of the working day with permanent repairs being instigated within seven working days. Inspections, defects, damage and repairs will be recorded in the site diary or the site environmental file where appropriate.

Drainage systems including gullies, drains, drain covers and interceptors will be inspected on a monthly basis. Site interceptors shall be emptied by an authorised contractor in accordance with the manufacturer recommendations, who state that oil and diesel should be removed when capacity reached at a frequency no less than every 6 months. In reality the site interceptors will be cleared of skimmed of oil and the contents removed from site for treatment, recycling or disposal (where relevant).

All operational mobile plant and fixed equipment will be maintained and inspected by a competent person and records of inspections and maintenance schedules shall be retained on site.

All inspections, defects, damage, maintenance and repairs will be recorded in the appropriate site files or the site diary.

The site manager will undertake regular checks of the sites surfaces to ensure that they are maintained in good condition and repairs across the site are anticipated and planned for. Damaged and worn site surfaces will be repaired as required as part of the on-going site maintenance program, at times when shutdown periods are planned or when stocks on site can be relocated to appropriate alternative storage areas. Details of any damage requiring repair shall be recorded on a TCM Event log.

3.1.6 Drums, IBCs and Containers of liquids

All drums, IBCs and other containers containing must be undamaged, sound and enclosed with lids / caps etc. (where relevant). All drums, IBCS and other mobile containers containing liquids must be labelled with description of their contents. Hazardous liquids must be stored in appropriate UN approved drums e.g. brake fluid must be stored in a steel, bunged, 205L drum and labelled appropriately.

If stored externally they must also be stored in bunds or on bunded pallets. Any liquids present in bunds / bunded pallets from leaks, spillages, rain water etc. which reduces their capacity must be cleared as soon as possible.

SECTION 4 - SITE OPERATIONS

4.1 Waste acceptance and control systems & procedures

4.1.1 Waste acceptance
Vehicles arriving at the site enter the main gates, pass between radiation detectors and drive onto the weighbridge located inside the main entrance. Ferrous metals and non-ferrous metals will be weighed into site via the main weighbridge however smaller loads of non-ferrous metals may be directed to the non-ferrous site to have smaller materials individually weighed, inspected and accepted.

If the materials are determined as acceptable by initial inspection, the vehicle will directed to a suitable area to discharge its load. The tipping areas may vary depending upon various factors such as stocking levels, material type and processing that will be required. Once the load is tipped, the materials are again inspected by the off-load inspector or plant operator to determine whether they are acceptable. Should unacceptable materials be observed at this point, contrary items are returned to the vehicle and rejected from site if deemed safe to so by the depot manager. The vehicle driver and / or customer are notified of the reasons for the rejection. Radio communications are maintained between weighbridge, yard inspectors and / or plant operators during the acceptance of waste at the site.

Once a load has been tipped, inspected and deemed as acceptable, the vehicle is cleared to return to the weighbridge where the net weight of the material tipped is determined, and the final weighbridge ticket is issued.

Written records of all rejections are maintained by weighbridge staff. The Environment Agency will be informed of any loads quarantined on site or rejected from site that pose a significant risk of pollution of the environment or risk to human health outside of the site boundary. Any incidents of rejections, non-conforming waste being accepted onto site etc. shall be recorded on a TCM Event log. *[See Waste Acceptance EPPs 1.1 –EPP 1.17]*

4.1.2 Unacceptable Materials Procedure
In the event that non-conforming materials or prohibited items are detected in incoming waste loads after initial inspections, these will be segregated on discovery and quarantined in an appropriate area. An assessment will be made of the properties of the waste, and if necessary specialist advice obtained regarding handling and disposal. The waste acceptance Environmental Protection Procedures or EPPs (as listed in the EPP Index in the appendix), outline the waste acceptance, inspection and rejection procedures of waste and prohibited items in detail.

[See also waste acceptance EPPs].

4.1.3 Hazardous Wastes
The site only accepts those wastes detailed in Table 1, however other hazardous wastes may be generated as part of treatment processes. Any hazardous wastes accepted at the site will only be accepted with the appropriate consignment paperwork and transfer notes in accordance with the Hazardous Waste Regulations 2005 and industry guidance. These wastes will then be stored in appropriately engineered areas.

Any contravening hazardous wastes discovered in loads will be isolated and traced back to their source supplier where possible. If the source of the hazardous waste cannot be ascertained, then the waste will be quarantined until it can be safely treated on site or until it can be removed from the site for reprocessing or disposal at an appropriately permitted facility.

4.1.4 Wastes Containing Liquids

The site will not accept tanks or drums unless they have been confirmed as having been purged of their contents through provision of a purge certificate or via suitable inspection points being provided. Waste drums, tanks or containers containing residues of hazardous liquid (e.g. oils / fuels) will themselves be designated / classified as hazardous wastes and will not be accepted onto the site.

Liquids and other hazardous components shall be drained or removed from End of Life Vehicles (ELVs) in accordance with the End of life Vehicle Regulations as detailed in section 4.4.1 Storage and depollution of end of life vehicles. All storage and treatment of undepolluted vehicles will take place on an impermeable surface served by a sealed drainage system.

4.1.5 Metal Shearing and baling

Only material permitted in the Environmental Permit is allowed to be processed by the shear or baler. Failure to do so will result in a breach of permit conditions and possible enforcement action.

Safe Working Procedures (SWPs) have been developed for each individual process involved in the shear operation. These procedures will be followed at all times when operating the shear.

Inspection of the shear will form part of the regular SHE (safety, health and environment) inspection regime. If there are any defects of the shear or it is not operational or not performing correctly and especially if the defect may potentially cause environmental harm or pose a health and safety risk, then the shear will be shut down and reported to the site manager immediately.

Any oil (hydraulic or lubricating oil) leaks or spills emanating from the shear will be reported immediately and the appropriate spill response procedure initiated (or accident and emergency plan if there is a major spill).

A regular maintenance schedule will be implemented for the shear. Only authorised trained personnel will operate and perform repairs to or maintenance of the shear and safe working procedures (SWPs) to be followed at all times. Any defects, spillages etc. will be reported on a TCM Event log.

[See EPP6.4 Shear and Baler Operation]

4.1.6 Heavy Media Plant (HMP)

Only material permitted in the Environmental permit will be allowed to be processed through the Newmarket Heavy Media Plant (HMP). Any non-compliant material passed through the plant will result in a breach of permit conditions potentially resulting in enforcement action.

Safe Working Procedures which have been developed for the HMP processes will be followed at all times during operation.

Inspection of the plant will form part of the regular SHE (safety, health and environment) inspection regime. If the plant breaks down or is not functioning correctly and especially if the defect poses an increased health, safety or environmental risk then, operations must cease and the plant supervisor or manager informed immediately.

A regular maintenance schedule will be implemented for the plant. Only authorised personnel will operate and perform repairs to or maintain the plant and Safe Working Procedures (SWPs) plus Environmental Protection Procedures (EPPs) will be followed at all times (see Appendix 2 for Heavy Media Plant - HMP Operation).

During dry periods, any excessive levels of dust generated will be reported to the plant supervisor / manager and the dust mitigation strategy implemented. A record of the incident will then be recorded in the site diary/ log and on a TCM Event log.

Recycled water will be used throughout the process; topped up by mains water as and when required.

4.1.7 Gladiator, Centurion and Dust Plants
Safe Working Procedures which have been developed for the plant processes and these will be followed at all times during operation.

Inspection of the plants will form part of the regular SHE (safety, health and environment) inspection regime. If any of the plants break down or are not functioning correctly and especially if the defect poses an increased health, safety or environmental risk then, operations must cease and the plant supervisor or manager informed immediately.

A regular maintenance schedule will be implemented for the plants. Only authorised personnel will operate and perform repairs to or maintain the plants and Safe Working Procedures plus Environmental Protection Procedures (EPPs) will be followed at all times.

During dry periods, any excessive levels of dust generated will be reported to the plant supervisor / manager and the dust mitigation strategy implemented. A record of the incident will then be recorded in the site diary and on a TCM Event log with description of relevant operations (potential sources):

e.g. “Today loading HMS (Medium Scrap) & tipping all grades of scrap.

Or SMART practices are being followed”

4.1.8 WEEE (waste electrical and electronic equipment)
Waste electrical and electronic equipment (WEEE) can be split up into 5 different groups:

Group A *(non-hazardous WEEE)* – large domestic appliances (LDA) (washing machines, tumble driers, dishwashers etc) excluding fridges and freezers
Group B – fridges and freezers
Group C – Cathode Ray Tubes (TVs and monitors)
Group D – fluorescent tubes

Group E – small mixed WEEE (SMW) consisting of everything else (lawnmowers, hoovers, PCs, small household appliances, tools etc)

- Only group A loads can be accepted into the site (consisting of partially or entirely of Group A large domestic appliances – LDA). Group A WEEE is classified as non-hazardous.
- Group B wastes are prohibited from the site and shall be redirected to designated fridge processing plants (rejected from site).
- Groups C, D shall be rejected at the weighbridge. Although it is accepted that very small amounts may be present in ordinary loads of light iron from CA sites.
- Any loads which the WBO is unsure of will be moved off the weighbridge to be inspected by the Depot Manager.

Items that fall into Group A

1. Loads will be inspected to ensure that the load consists only of items that fall under the group A category
2. Loads will be graded and accepted as a light iron grade as appropriate.

Items that fall into Group B

Loads are inspected to ensure that there are no Group B items, as the site is not a fridge processing plant or a designated 'feeder site' the load will be redirected to one of these sites.

Items that fall into Group C, D.

The load will be inspected to ensure that there are no items in the load consisting of Group C and D items.

Items that fall into Group E

The site is permitted to accept and store these groups of WEEE (SMW or small mixed WEEE) under the site's S2 permit exemption.

[See EPP1.9 Waste Acceptance & Rejection]

4.1.9 Pressurised Containers

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

Records of the collection and disposal of gas cylinders will be retained in files and on the company Trade 2 weighbridge system.

[See EPP 1.7 Identification of potentially explosive items and EPP 1.8 Rejection of waste material]

4.2 Waste classification, sampling and testing

All wastes before they are moved (transferred), recovered, treated or disposed of, must be fully characterised and classified. Full and comprehensive waste characterisation, classification and assessment of waste is described in the Environment Agency guidance document WM3: Waste

Classification & Assessment (published in 2015 and revised in 2018) and in the EMR Waste Management Guidance document E09-G01.

This classification of waste is based on the EU chemical classification legislation, which references the European Classification, Labelling and Packaging Regulation (CLP). Chemical constituents of wastes must be classified in accordance with the guidelines of WM3, which has introduced hazard statements to assess chemicals and substances contained in all wastes.

Knowledge of waste and the processes producing the waste in question will normally determine the suite of analyses to be applied. The SHE Manager or Waste By-product manager will be consulted to confirm the correct suite of analyses to be used.

The sites waste acceptance criteria do not routinely require wastes accepted to be subject to sampling or testing. If the site does accept any materials that may be classified as hazardous, then the site will require that appropriate documentation detailing the relevant hazardous properties and safe storage and handling requirements is provided.

Any waste generated by the site and destined for landfill (for the first time) must be sampled and analysed as part of WAC (Waste Acceptance Criteria) requirements. Waste classification / characterisation of new waste streams will normally be performed by the EMR the Waste By-product team.

[See *Waste Classification & Characterisation guidance and Waste Management Guidance document E09-G01*]

[Refer to waste sampling protocol for correct waste sampling procedures].

[For full details of waste classification and assessment, see Waste Classification – Technical Guidance WM3 – Version 1.1 May 2018].

4.3 Waste quantity measurement systems

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

The sites weighbridges are calibrated on a minimum annual basis under service contract and more regularly if required when maintenance is undertaken (e.g. Avery). The validity of these calibrations will be confirmed on a minimum annual basis by the weights and measures section of the Trading Standards Agency, this can again be undertaken more regularly if required.

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

4.4 Storage of specified wastes
Wastes with particular properties may require additional storage and processing controls to manage potential risks to the environment.

4.4.1 Storage and Depollution of End of Life Vehicles
The End-of-Life Vehicle Regulations 2003, Statutory Instrument No. 2635 regulates the acceptance, storage and depollution of end of life vehicles.

Storage Areas
Storage and treatment areas will be engineered with appropriate, impermeable surfaces and provided with appropriate equipment for the treatment of water (including rainwater) in their through the provision of sealed water storage tanks or through diversion via a full retention interceptor to an appropriately permitted final discharge point.

The treatment of waste motor vehicles shall only be carried out in areas of the site which have the following;

- Appropriate areas engineered with impermeable surfaces to protect the underlying ground and groundwater and provided with spillage collection facilities.
- Appropriate areas provided with containers that are appropriate for the storage of materials removed from vehicles where separation is required, i.e. batteries;
- Appropriate areas provided with suitable storage tanks used for the appropriate storage of any fluid from a waste motor vehicle;
- Appropriate areas for the storage of used tyres without excessive stockpiling, and minimising any risk of fire.

Treatment operations for the depollution of waste motor vehicles
The treatment / depollution of waste motor vehicles stall consist of following when applicable:
- the removal of the battery or batteries;
- the removal of the liquefied petroleum gas tank;
- the removal or neutralisation of all potentially explosive components (including air bags) through deployment;
- the removal, collection and storage of all vehicle operating fluids, excluding those which need to be retained for the reuse / recycling of any operating parts, including ;
    - Petrol or Diesel
    - Engine Oil
    - Brake fluid
    - Windscreen wash water / antifreeze mix (glycol)
    - Shock absorber oil
    - Air conditioning gases (where applicable)
- the removal, so far as is feasible, of all components identified as containing mercury.

In order to promote the subsequent recycling of ELVs, the following may be removed and segregated where present in order to promote to facilitate this.
- the catalyst or catalysts (hazardous waste);
- (either during shredding or otherwise) of non-ferrous metal components;
- the tyres;

- (either during shredding or otherwise) of all large plastic components;
- (either during shredding or otherwise) glass;
- and where any such article or material is removed it shall be done in such a way as best promotes its recycling.

[See EPP1.5 ELV Acceptance; EPP 2.1 Storage of ELVs; EPP 6.1 ELV depollution and SOP (Standard Operating Procedure) ELV depollution]

4.4.2 Storage of Metal Filings and Turnings

Due to the pollution potential of turnings that arrive on site this waste will be be stored in accordance with procedures:-

1 Ferrous or non-ferrous turnings will be stored in a dedicated "turnings bay" or engineered storage area with a 'sleeping policeman' installed at the bay entrance and a drain for any excess cutting fluid to a sealed sump. Alternatively turnings will be stored in a sealed container.

2 If an oil spill does occur on site outside the designated storage area then it must be cleaned up using available spill kits and or absorbents. Staff will be trained on site in spillage management procedures.

3 Haulers and disposers of waste oil must be on the approved haulage contractors and the receiving facility must be permitted to do so. Where authorised contractors are used to remove accumulations of turning oils from bunds and sealed drainage systems, copies of transfer notes will be retained on site for an appropriate period as detailed in section 7 of the sites working plan.

[EPP 2.5 Storage of Turnings].

4.4.3 Acceptance and Storage of Lead Acid Batteries

Lead acid batteries are normally accepted at site from a range of sources and they will also be produced on site through the treatment of end of life vehicles. When lead acid batteries are received or generated on site and are subsequently stored prior to transfer to a suitably permitted treatment facility, the following steps will be followed:

Acceptance

EMR will only accept waste on site in accordance with its waste acceptance procedures. The site will maintain waste transfer records as specified in section 7 of the working plan. Lead acid batteries are classified as hazardous waste; therefore they must be accepted and dispatched from site in accordance with the Hazardous Waste Regulations 2005.

Storage

1 All batteries will be stored in a storage area with an impermeable floor and covered roof.
2 Neutralising materials, liquids or granules will be maintained on site for use in there event of a battery acid spill. Staff will be trained on site in spillage management procedures.
3 If an acid spill should occur, it will be cleaned up immediately.

4 All batteries must be stored upright in acid resistant plastic battery bins. Where practical these should be covered prior to transfer to the battery storage area to prevent the ingress of water.
5 All designated battery storage areas / battery storage bins will be clearly labelled

Dispatch
1 Lead acid batteries are classified as hazardous waste; therefore they must be accepted and dispatched from site in accordance with the Hazardous Waste Regulations 2005.
2 Hauliers and disposers of lead acid batteries must be approved suitably permitted contractors and the receiving facility must also be suitably permitted to accept lead acid batteries. Where authorised contractors are used to remove lead acid batteries copies of transfer notes will be retained in accordance with section 7 of the sites working plan.

[See EPP 1.11 Battery Acceptance; EPP 2.3 Storage of batteries]

4.4.4 Acceptance and Storage of Tyres
Tyres will be accepted at site as part of end of life vehicles however they may also be received from other sources in accordance with waste acceptance and control procedures. When tyres are received or generated on site and are subsequently stored prior to transfer to a suitably permitted treatment facility the following steps must be taken:

Acceptance
EMR will maintain site acceptance records of all materials accepted at site in accordance with section 7 of the environmental management plan.

Storage
Tyres will be stored in stable stacked stock piles or within appropriate containers on site. Where necessary tyres will be processed to obtain increased storage capacity. This will be achieved by one or more of the following processes: removal of inner wheel rims, cutting / size reduction, shredding or compaction.

Each storage stock pile will be a maximum of 50 cubic metres in volume and shall be separated by a distance of at least 6 metres from each other and other combustible waste materials and flammable substances.

Dispatch
Haulers and disposers of waste tyres must be approved suitably permitted contractors and the receiving facility must also be suitably permitted to accept tyres. Where authorised contractors are used to remove tyres from site, copies of transfer notes will be retained as detailed in as detailed in section 7 of the sites working plan.

4.4.5 POPs Waste

POPs (persistent organic pollutants) may be present in some WEEE wastes such as hazardous small mixed WEEE but it may also be present in non-hazardous large WEEE such as separately collected (e.g. LDA loads) from time to time (e.g. plastic heat shields, oven hoods, plug cables attached to electrical appliances). The plastics present in the WEEE may contain high levels of hazardous substances such as POPs (Persistent Organic Pollutants) for example brominated

flame retardants, PFOS etc. Under new and amended legislation and guidance, these materials may be characterised and classified as hazardous wastes dependent on their presence and concentration.

Pre-acceptance procedures will be applied to all contracted incoming POPs containing wastes (including WEEE - both hazardous and non-hazardous). Waste characterisation and classification will be conducted in accordance with WM3 (Environment Agency - Technical Guidance WM3, Interpretation of the definition and classification of hazardous waste). Any new types of wastes to a site are assessed by the EMR Waste and By-product team who undergo waste characterisation and classification on the any new waste materials.

On arrival at the site all suspected POPs containing loads will be inspected and checked against the waste description as shown on the accompanying duty of care waste transfer note (WTN) as part of waste acceptance procedures.

Once the pre-acceptance process has been completed the wastes will be classified accordingly and the relevant EWC code will be applied, (based on the WM3 classification outlined above) and stored and processed as the two separate streams (stored separately and processed separately). If POPs containing plastics are encountered (and confirmed as containing POPs), the load / item will be segregated, stored separately in a container, located in a suitable quarantine area prior to transfer off site as hazardous waste to an appropriately permitted and approved (waste to energy) incineration facility (*see POPs guidance in Appendix)*

4.6 CONTROL OF POTENTIALLY POLLUTING LEAKS AND SPILLAGES

4.6.1 Liquid storage
Liquids, such as fuels, shall be stored on site in accordance with 3.1.3. Liquid wastes arising from the depollution of ELVs will require temporary storage on site, prior to collection by authorised contractor.

4.6.2 Procedures for control and remediation of leaks and spillages
Any minor spillage will be cleaned up utilising absorbent materials maintained on site.

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

Any scrap material or plant and equipment leaking fuels and oils will only be drained on concreted surfaces which are fully drained to interceptor.

Any potentially polluting incident will be recorded in the site diary / log and on the TCM Event log.

4.6.3 Equipment and materials for cleaning up leaks and spillages
Absorbent materials are maintained on site and its location made known to all operatives. Any contaminated spill dry equipment will be disposed of at a suitably permitted facility.

4.6.4 Wastes Containing Liquids

Each load of waste arriving at the site is covered by a weighbridge ticket which also fulfils the requirements of the Duty of Care Transfer Note. The information is checked against the load on arrival at the weighbridge and again when the vehicle discharges its load. Any waste which is determined as unacceptable is then loaded back onto the vehicle and rejected from site.

Liquid containing wastes which are accepted in accordance with the environmental permit are handled in accordance with section 4.4.

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

All storage containers containing liquids will be appropriately labelled and any relevant warning signs displayed.

SECTION 5 - POLLUTION CONTROL, MONITORING AND REPORTING

5.1 Monitoring and reporting for specified gases, vapours and aerosols

The handling of waste material and processed metals on the site is not considered to give rise to emissions of specific gases, vapours or aerosols at such levels or concentrations that there is a measurable risk of pollution of the environment or human health outside of the site boundary.

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

5.2 Groundwater monitoring and reporting systems

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

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

5.3 Surface water monitoring and reporting

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

However if a potential environmental issue is identified, that may potentially effect the surrounding surface waters then appropriate steps may be taken by EMR to monitor at a number of appropriate points around the site.

5.4 Monitoring of meteorological conditions

Weather conditions will be monitored by the accessing the weather forecast for the week from the Met office website (e.g. wind speeds and direction).

Records will be maintained in the site diary / log of any meteorological conditions that adversely effect the sites operation, such as high wind, steps will be taken to mitigate the effects.

5.5 Pollution Control

Spill kits and equipment (e.g. booms etc.), absorbent granules and suitable drums for containment of contaminated spill absorbent materials will be made available across the site to help mitigate the pollution of the ground and controlled waters in the event of a spill of a polluting substance (e.g. IBC of hydraulic oil).

If a serious spill were to occur then the site's Emergency Plan will be enacted, which will include emergency contact details and telephone numbers. The penstock valves (pre-sort and HMP) will be closed to retain polluting substances in the site drainage before clearance (by tanker) can be arranged.

The pollution control hierarchy will apply if a large spill were to take place (e.g. burst tank / IBC):

1. Contain at Source - *preferred response*
2. Contain close to source.
3. Contain on the surface
4. Contain in the drainage system
5. Contain on or in the watercourse (e.g. using booms)- *least preferred response*

Contaminated waste absorbent materials (e.g. oil contaminated spill sorb, booms etc.) generated in spill clearance, will be disposed of into appropriately labelled, UN approved, clip-top steel drums and transported off-site, as hazardous waste, to a suitably approved and permitted hazardous waste treatment and disposal facility.

Staff will be trained in spill and pollution control and at least one spill emergency drill will be completed per annum and recorded on an Emergency drill report (and any lessons learnt recorded, re-training agreed etc.).

'Ponding' on site may occur from time to time due to heavy rain, if this becomes excessive then removal of water by tanker or using water pump will be considered to remove excessive water. Polluting materials such as undepolluted ELVs must not be stored in areas of the site with ponding water.

[*See Emergency Plan; EPP 5.2 Spill Response]*

5.6 Notifications

Any site activities or operations that gives rise to an incident or an accident which significantly effect or may significantly affect the environment (e.g. a fire or major pollution event) will be reported to the Environment Agency on the EA Emergency line (see Environmental Management Plan) and an incident reference number obtained. Additionally any major failure, malfunction of equipment such as the fragmentizer (shredder) which may cause significant environmental effects or breach any limits specified in the permit will reported to the Environment Agency immediately.

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

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

Information and details of the incident will be recorded on a Schedule 5 notification form (attached to the permit), with Part A initially being filled out within 24 hours of the incident,

followed by Part B detailing any investigation, mitigation measures and actions taken, as soon as practicable .

All environmental incidents, plant breakdowns etc. will be recorded on a TCM Event log**.**

SECTION 6 – AMENITY MANAGEMENT AND MONITORING

6.1 Control of mud and debris

The site benefits from impermeable pavement extended across storage and processing areas and the site main access road; therefore mud and other debris are unlikely to be generated due to the absence of adequate site surfacing and tracked onto the road from inside the site. In addition to the provision of impermeable site surfaces where required a mechanical sweeper will be provided to remove any other debris that could potentially be tracked onto the road from inside the site.

The access road to the site will be visually inspected on a daily basis and twice daily during inclement weather. In the event that mud or debris is observed which is likely to have arisen from the site, action will be taken as soon as possible to resolve this issue. The site will either maintain its own sweeping equipment or use an appropriate contractor available at short notice to remove mud and debris. Any abnormal event outside of day to day operations where the attendance of sweeping contractor is required, such as a specific load brought to site which has caused mud and debris, will be recorded in the site diary / log and TCM Event log.

6.2 Fires on site

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

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

- In the event of a fire that can not be extinguished safely with on-site equipment, the Fire Brigade will be contacted by dialing 999.
- The site emergency plan will be initiated.
- The site manager will evacuate all staff and visitors from potentially hazardous areas and direct them to the nominated fire assembly point and ensure all relevant personnel are present.
- The staff at the weighbridge will be informed for the purposes of directing emergency service vehicles.
- The following EMR personnel will be contacted to notify them of the situation:
  - Operations Manager
  - General Manager
  - Regional SHE Manager
  - SHE Specialist
- Once the fire brigade are called and the relevant EMR staff notified, the Environment Agency (EA) will also be notified by either their main number within office hours or via the Environment Agency Emergency No. 0800 80 70 60 (outside of office hours). An incident reference will be requested from the EA for future reference.
- Where required, appropriate contractors will be instructed to deal with fire water* and other linked residues.

All fire incidents are recorded in the site diary / log and TCM Event log and will be subject to an internal investigation.

[See site Emergency Plan and Fire Protection Plan (FPP); EPP 5.1 Fire Prevention & Response]

6.3 Environmental incidents / Emergencies

If a major environmental incident occurs on site (other than a fire) then the site's Emergency Plan will be initiated and steps will be taken as described in the emergency plan dependant on the type of incident or occurrence. This will include (but will not be limited to):

- Asbestos in loads
- Radioactive items in loads
- Major spillage (oils, fuels, chemicals etc.)
- PCB (polychlorinated biphenyl) contaminated items
- Flooding

In the event of a major incident (including fires) the Environment Agency (EA) will be informed immediately and a Schedule 5 notification will be required to be completed and sent to the EA (format is Schedule 5 of permit); Part A will need to be filled out first and following an investigation and measures taken or planned to prevent a reoccurrence of the incident, Part B can then be filled out an submitted to the EA.

The incident will then be recorded in the site diary log and on a TCM Event log.

[See site Emergency Plan; EPP 5.2 Spill Response]

6.4 Control, monitoring & reporting of dusts, fibres and particulates

Regular inspections / visual checks will be undertaken throughout the working day by the site management and any potential dust problems identified. Potential problems may include unfavorable weather, such as windy, dry or sunny conditions and direction of prevailing winds which may result dust generation. If dust is assessed to be an issue the site manager will monitor the situation closely and take appropriate mitigating actions including use of suppression sprays and management of processing operations.

Dust monitoring will be implemented on at least a visual basis at times when the risk of significant dust release is perceived to be possible. Any complaints from neighbours or the local community will be investigated. Where appropriate more quantitative methods of dust monitoring will be used if a problem is perceived to be continuing or in the case where the cause of dust needs to be established such as dusts being generated by off site sources.

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

Currently dust suppression measures include use of a mobile water bowser, sweeper attachment to mobile plant and water cannons (dust bosses).

Schedule 3 of the Environmental Permit (point source emissions to air) will be applied at the Heavy media plant bag filter system (emission point: NGR: TL63613 68066); no visible dust will be generated at this point. Monitoring by visual observation will be conducted daily and visible

dust observed will be reported to the depot manager immediately and an Event log will be raised. If the event (visible dust) becomes frequent a Schedule 5 Notification will be sent to the Environment Agency.

[See EPP 4.4 Mud and Dust Control; EPP 4.11 General Housekeeping; EPP 4.12 Nuisance]

6.5 Control of odours

The types of materials that will be received and processed at the site are not likely to result in the significant generation of odours. In the event that complaints are received relating to odours on site, the potential cause shall be investigated with details and the results of any investigations recorded in the site diary / log and a TCM Event log.

[See EPP 4.5 Odour Control]

6.6 Control and monitoring of environmental noise/vibration

In order to minimise noise / vibration generated from plant, equipment will be maintained in accordance with manufacturer's specifications.

The company will take appropriate steps at all stages of waste handling from acceptance, to processing to final export to minimise the risk of noise generating events such as explosions through its acceptance criteria procedures. This will be achieved through the inspection of materials for items such as gas cylinders and through ensuring that items such as ELVs are properly depolluted therefore where possible removing risks from explosive vapors.

Operating and waste acceptance hours are restricted in accordance with planning permission and permitting restrictions.

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

[See EPP 4.3 Noise Control]

6.7 Control of pest infestations

A monthly inspection will be undertaken for infestation by pests and vermin by an approved specialist pest control contractor (currently Dealey Environmental). The attendance of the contractor is recorded in the site diary / log.

[See EPP 4.1 Pest Control]

6.8 Control of litter

The boundaries of the site will be inspected on a daily basis and any litter present will be collected by the end of the working day. Incoming loads will be inspected (as part of waste acceptance procedures) to ensure that no loads containing rubbish or litter are accepted on to the site.

[See EPP 4.2 Litter Control]

6.9 General Amenity and Removal and Disposal of Waste Residues

The site is situated within a rural semi industrial area, adjacent to a railway line away from any sensitive receptors. Scrap metal and associated wastes will not be stored at heights that would present an adverse, visual amenity to the local environment.

Waste (or 'dirt') generated from waste processing destined for landfill will be segregated and stored in a designated area. For any waste destined for landfill, only approved waste contractors will be used and the appropriate duty of care documentation completed, on transfer of the waste to a permitted facility. WAC testing will be performed where relevant prior to landfilling waste to specific landfill site for first time (EPP 2.8 Waste Storage and processing).

[See EPP 1.16 Duty of Care – Disposal of 'soil' and 'dirt' (waste residues)]

SECTION 7 - SITE RECORDS

7.1 Security and availability of records

EMR will maintain site records at the locations specified in section 7.2, Table 4. These locations shall be deemed to meet the agencies requirements in that they will be within easy daily / routine access of the Agency Area office for the site.

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

7.2 Records of waste movements

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

Table 4 Retention and availability of records

Records	Location	Retention Time Period
Weighbridge tickets	On site	6 years
Incoming hazardous waste consignment notes	On site	6 years
Out going consignment notes and transfer notes from servicing contractors removing contaminated liquids, absorbents and waste oils	On site	6 years
Electronic Records	Head Office (Warrington) Server – with national access for any authorised site and user.	Electronic records commenced in 1999 long term retention time scales are yet to be established (anticipated to be a minimum of 10 years).

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

7.3 Site Diary / log

The site diary will be maintained in the site weighbridge office and shall be maintained by the site manager or those operatives which the manager delegates its maintenance to. Other similar documents and information recording systems may also be maintained.
The site diary will be kept for two years.

7.4 Periodic Reporting of Environmental Performance

EMR will centrally manage the tonnage returns ('waste returns') to the Environment Agency detailing its inwards and outwards waste movements by EWC code in an electronic format, and the hazardous waste returns to the Environment Agency.

A summary for each calendar month shall be submitted to the Agency annually

Copies of the returns will be retained centrally.

7.5 Additional Records, Safe Working Procedures, Risk Assessments and Emergency Procedures

In addition to the statements and procedures detailed with this working plan the site may also implement and retain additional safe working procedures, risk assessments and emergency plans within the site files which are updated on a reactive basis linked to relevant operating issues.

SECTION 8 - ENVIRONMENTAL MANAGEMENT SYSTEM

In order to reduce the site's environmental impact, an informal Environmental Management System or EMS will be implemented to provide the company with a framework through which its environmental performance can be monitored, improved and controlled. The EMP (formerly working plan) forms part of the wider management system (EMS) and references the site permit conditions and requirements.

The EMS for the site will comprise of an environmental policy, the environmental management plan (formerly working plan) for the site, planned environmental risk assessments, environmental procedures (EPPs), environmental auditing, planning and review, emergency plan and environmental training. Most of this will now be supported on an electronic SHE Integrated Managements System (IMS). The wider EMS forms part of a company Integrated Management System (IMS) accredited to ISO14001, ISO9001 and ISO45001 (accredited and certified by LRQA – Lloyds Register).

8.1 Environmental Policy

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

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

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

8.2 Environmental Risk Assessments and Procedures

Planned environmental risk assessments will be conducted at the site to identify significant environmental impacts and risks and these will be translated into procedures as appropriate; environmental protection procedures (EPP) will be written and appropriate training given to staff in the implementation of these procedures.

An Emergency Response Plan will be implemented for the site to supplement these.

The core EPPs implemented on site (applicable to most of EMRs metal recycling and ELV depollution sites are listed in Appendix 1).

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

8.3 Environmental management training

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

The depot manager will be technically competent or will undergo the requisite CoTC training or WAMITAB / NVQ4 training (or equivalent) or be scheduled to attend the relevant course.

8.4 Environmental Auditing

The site will undergo a full Environmental Audit at least once per year, led by the Regional SHE Manager, recorded and reported and actions generated on to the TCM electronic SHE management system. This is also supplemented by internal audits (including ISO management system audit) conducted by Mayers Environmental Ltd.

References:

Environment Agency – 'How to comply with your environmental permit' (Environment Agency website)

Environment Agency - Technical Guidance WM3, Classification of Wastes – Guidance document , (Appendix A: Consolidated European Waste Catalogue)

Environment Agency - PPG 2 Safe storage and disposal of used oils

Environment Agency- PPG 8 Above ground oils storage tanks

Environmental Permitting Regulations (England and Wales) - 2016

Appendix 1 - Environmental Protection Procedures (EPPs) Index

EPP-0.1 Environmental Protection Procedures Index

Reference	Title
Waste Acceptance	
EPP 1.1	The Duty of Care - Acceptance of incoming material
EPP 1.2	Inspection of Incoming Materials
EPP 1.3	Identification of Hazardous Waste
EPP 1.4	Completion of hazardous waste consignment notes
EPP 1.4a	Completion of special waste consignment notes
EPP 1.5	ELV Acceptance
EPP 1.6	Identification of Radioactive Items
EPP 1.7	Identification of Potential Explosive Items
EPP 1.8	Rejection of Material
EPP 1.9	WEEE & Refrigerator Acceptance
EPP 1.10	Duty of Care - Waste Removals
EPP 1.11	Battery Acceptance
EPP 1.12	Steel Can Waste Acceptance
EPP 1.13	Catalytic Converters
EPP 1.14	Inspection of Baled Materials
EPP 1.15	Radioactive Item Disposal
EPP 1.16	Duty of Care – Disposal of Soil & Dirt
EPP 1.17	Waste Acceptance and Rejection
Storage of Potentially Polluting Materials	
EPP 2.1	Storage of ELV
EPP 2.2	Storage of Oils & Fuels
EPP 2.3	Storage of Batteries
EPP 2.4	Storage of Engines
EPP 2.5	Storage of Turnings
EPP 2.6	Storage of Gas Cylinders
EPP 2.7	Storage of Scrap Metal
EPP 2.8	Storage of Fragmentiser Waste
EPP 2.9	Storage of Waste Tyres
EPP 2.10	Storage of WEEE
EPP 2.11	Storage of Putrescible Waste
EPP 2.12	Storage of Radioactive Items

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Reference	Title
EPP 2.13	Storage of Plastic Frames
EPP 2.14	Storage of POPs Containing Cable
EPP 2.15	Storage of Wastes

Infrastructure Requirements & Maintenance	
EPP 3.1	Interceptor Inspection and Maintenance
EPP 3.2	Bund Inspection and Maintenance
EPP 3.3	Sump Inspection and Maintenance
EPP 3.4	Taking Water Samples
EPP 3.5	Management & Control of drainage & surface water discharge
EPP 3.6	Water Discharge Failure of Effluent Treatment Plant (YBNF)
EPP 3.6-01	Daily Waste Water Testing Schedule (YBNF)
EPP 3.7	Infrastructure – Taking Soil Samples
EPP 3.8	Inspection and Maintenance of Interceptors, Bunds and Sumps
Nuisance	
EPP 4.1	Pest Control
EPP 4.2	Litter Control
EPP 4.3	Noise Control
EPP 4.3b	Noise Control (Bedford)
EPP 4.4	Mud and Dust Control
EPP 4.5	Odour Control
EPP 4.6	Vibrations
EPP 4.7	Explosions
EPP 4.8	Fly control
EPP 4.9	Light Pollution
EPP 4.10	Management and Control of Invasive Species
EPP 4.11	General Housekeeping
EPP 4.12	Nuisance
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EPP 5.1	Fire Prevention & Response
EPP 5.2	Spill Response

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Reference	Title
EPP-5.2a	Spill Response MBA Polymers
EPP 5.3	Hazardous Substance Deliveries
EPP 5.4	Fuel Tank Checks (YOLD)
EPP 5.5	Spill Response (Tilbury Dock)
Operations	
EPP 6.1	ELV Depollution
EPP 6.2	Fragmentiser Operation
EPP 6.3	Production Burning
EPP 6.4	Shear and Baler Operation
EPP 6.5	Weighbridge
EPP 6.6	Contractors
EPP 6.7	Trommel Operation
EPP 6.8	Ship loading and Despatch
EPP 6.9	Plastics processing and storage
EPP 6.10	Train Loading and Dispatch
EPP 6.11	Drivers
EPP 6.12	Mobile Baler
EPP 6.13	Factory Contract
EPP 6.14	Loading Steel Turnings for Export
Other	
EPP 7.1	Environmental Permit
EPP 7.2	Exporting of Material
EPP 7.3	Office Activities (YCEN)
EPP 7.4	Energy and Resource Efficiency Monitoring (YOLD)
Fridge Plant	
EPP 8.1	Refrigeration Unit Unloading (DARFDG)
EPP 8.1	Fridge Unit Acceptance and Unloading (WILFRG)
EPP 8.2	Refrigeration Unit Treatment (DARFDG)
EPP 8.2	Refrigeration Unit Treatment (WILFRG)
EPP 8.3	Fridge Plant Storage (DARFDG)
EPP 8.3	Fridge Plant Storage(WILFRG)
EPP 8.4	Fridge Compressor Checks (DARFDG)
EPP 8.5	Fridge Plant Monitoring (DARFDG)

Appendix 2 – Site Diary Log

1.2.2.3 Site Daily Diary

Site Location/Name:		**Date of report:**	
Technically Competent Manager Name:			
Time In:		**Time Out:**	

	Check Items	Circle as applicable			Comments/Issues		
1	Any non-permitted waste?	Y	N	n/a	*Describe:*		
2	Is dust / mud leaving site?	Y	N	n/a	*Describe:*		
3	Is there excessive noise/vibration?	Y	N	n/a	*Describe:*		
4	Is there a strong odour on site?	Y	N	n/a	*Describe:*		
5	Are security measures fully operational? (gates, fences/walls, locks, CCTV etc.)	Y	N	n/a			
6	Is pest control in place?	Y	N	n/a			
7	Any smoke/dust generated on site?	Y	N	n/a	*Describe:*		
8	Are radiation detectors functioning?	Y	N	n/a			
9	Any significant maintenance/construction work in progress?	Y	N	n/a	*Describe:*		
10	H&S and Env. signage in place?	Y	N	n/a			
11	Traffic routes clear of debris?	Y	N	n/a			
12	Loading/Unloading/Tipping areas suitable? *(ground condition, gradient, weather conditions etc.)*	Y	N	n/a	*Describe:*		
13	Vehicle and pedestrian circulate in a safe manner; pedestrian walkways and crossings in good condition and pedestrians wearing high-vis, safety helmet & correct PPE?						
14	Process plant operating?				**Machine Name**	**Start**	**Finish**
		Y	N	n/a			
	Is ships docked for loading?	Y	N	n/a			
		Y	N	n/a			
15	All emergency exits clear?	Y	N	n/a			
16	Dust curtain/netting intact?	Y	N	n/a			
17	Any plant/equipment breakdown?	Y	N	n/a	*Describe:*		
18	Housekeeping / litter controlled?	Y	N	n/a	*Describe:*		
19	Spillages cleared up?	Y	N	n/a			
20	Any complaints received?	Y	N	n/a			
21	Bunded Storage sound & secure? (ELV, Derv/Gas Oil, Drums, Turnings, Engines etc)	Y	N	n/a			
22	Dust suppression in use?	Y	N	n/a	*Describe:*		
23	Fire Fighting equipment operational?	Y	N	n/a			
24	Fire watch / checks completed?	Y	N	n/a	*Describe:*		
25	Discharge point running clear?	Y	N	n/a			
26	Gullies, drains, interceptor inspected?	Y	N	n/a			
27	Site free from flooding/ponding?	Y	N	n/a			
28	Any Waste rejected from site	Y	N	n/a			
29	Batteries stored correctly? (Ref. EPP 2.3)	Y	N	n/a			
30	*Other Issues to note (e.g. external activities potentially causing a nuisance/impact):*						

Weather	General Description (e.g. Dry, rain, snow etc.)	Temperature:	Wind: (Speed, direction)
AM			
PM			
Additional Action taken due to weather (for example dampening down):			

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Approved for IMS:	Danny Swygart			**Document owner:**	Regional SHE Manager - South East	Page 1 of 1	

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Appendix 3 – Persistent Organic Pollutants (POPs) – Guidance

POPs (persistent organic chemicals) are a group of organic chemical substances which, due to their specific physical and chemical properties, are able to persist in the environment for long periods of time (sometimes for decades) and may be harmful to plants and animals. They can travel long distances and accumulate in the bodies of plants and animals. They are a danger to human health and the environment.
Equipment and machinery that may contain or emit POPs, in metal production, waste material recycling and machinery businesses include:

- Microwave ovens
- Fan heaters
- Plug cables (attached to electrical appliances e.g. washing machines).
- electrical transformers
- process heating equipment
- high voltage equipment
- fluorescent light ballasts

The use of POPs is banned in the UK.

Substances present as persistent organic pollutants

There are currently 16 substances classed as POPs but more may be added in the future as further research develops.

POPs can be grouped into pesticides, industrial chemicals and POPs that are released accidentally from combustion processes or fires and some industrial processes, such as burning material and fuels. Some POPs may belong to more than one group.

Pesticides

- aldrin
- chlordane
- dieldrin
- hexachlorobenzene (HCB)
- hexachlorocyclohexane (HCH), including lindane
- mirex
- dichlorodiphenyltrichloroethane (DDT)

Industrial chemicals

- hexabromobiphenyl
- HCB
- polychlorinated biphenyls (PCBs)

Plastics

- Brominated flame retardants
- PFOS (Per-fluoro-octane-sulphonic acid).

POPs produced as by-products from industrial and combustion processes

- dioxins (polychlorinated dibenzo-p-dioxins (PCDD) and polychlorinated dibenzofurans (PCDF))

- HCB
- PCBs
- Poly-cyclic aromatic hydrocarbons (PAHs).

Restrictions:
POPs must not be produced, marketed or used anywhere in the UK or for export.
There are some exceptions to the ban on POPs:

Substances or materials containing POPs can be used for:
- laboratory-scale research
- as a reference standard, to calibrate scientific or analytical equipment
- if the POP occurs as an unintentional trace contaminant.

If POPs or POP-containing substances are permitted to be accepted and stored they must be disposed of correctly. If a material, waste or piece of equipment has a POP concentration at or above the thresholds stated in Annex IV of the POPs Regulation, then POPs and POPs containing wastes must be disposed of in accordance with Annex V, for example, by physico-chemical treatment or incineration in a suitably permitted facility.

They will also need to be assessed if the POP or POP-containing substance or equipment is classed as hazardous/special waste. This will place additional requirements on how they are stored, transported and disposed of.

For further information regarding the assessment and disposal of POPs contact the local environmental regulator (e.g. Environment Agency).

POPs produced from industrial processes.
Unplanned releases of POPs must be avoided at all times, for example, dioxins, HCB, PCBs and PAHs, from industrial activities and/or from burning material and fuels. These are the most common sources of POPs in the environment.

Releasing POPs
POPs are only likely to be released from industrial activities that require an IED permit. Sites must comply with the conditions in the permit, which will include requirements for controlling POPs releases.

Persistent Organic Pollutants in waste
If waste has a POP concentration at or above the thresholds stated in Annex IV of the POPs Regulation, you must dispose of it safely and in accordance with Annex V, for example, by physico-chemical treatment or incineration.

If a waste contains any concentration of POPs it may be hazardous/special waste. This will place additional requirements on how to store, transport and dispose of it. The level of contaminants in waste will need to be assessed to enable it to be disposed of safely.
Disposing and destroying waste that contains POPs.

If waste containing POPs is required to be dispose of or destroyed, other than by a method approved in Annex V of the POPs Regulation, a derogation (permission to carry out an otherwise banned activity) must be obtained from the environmental regulator. A fee for any derogation application will be charged and the site will need to meet certain strict conditions to obtain approval.

Reference

This guidance document is based on SEPA and NIERA guidance 'NetRegs':
https://www.netregs.org.uk/

Appendix 4 – Heavy Media Plant (HMP) Operation

The Newmarket Heavy Media Plant's (HMP) primary function is to separate aluminium from heavier metals and waste, utilising media separation.

The material is transported into the HMP by means of a conveyor and hopper arrangement. This material is fed onto a pre-wash screen where it is cleaned of any heavy grit or dirt, from in-feed material using recycled water.

This material is then passed over a de-watering screen to remove excess water and keep media free from dilution.

The material is then fed through a "Drew boy" wheel with media at a density of approximately 3000kg/m³. At this density aluminium and waste will float and heavier metals and some stone will sink to the bottom of the trough.

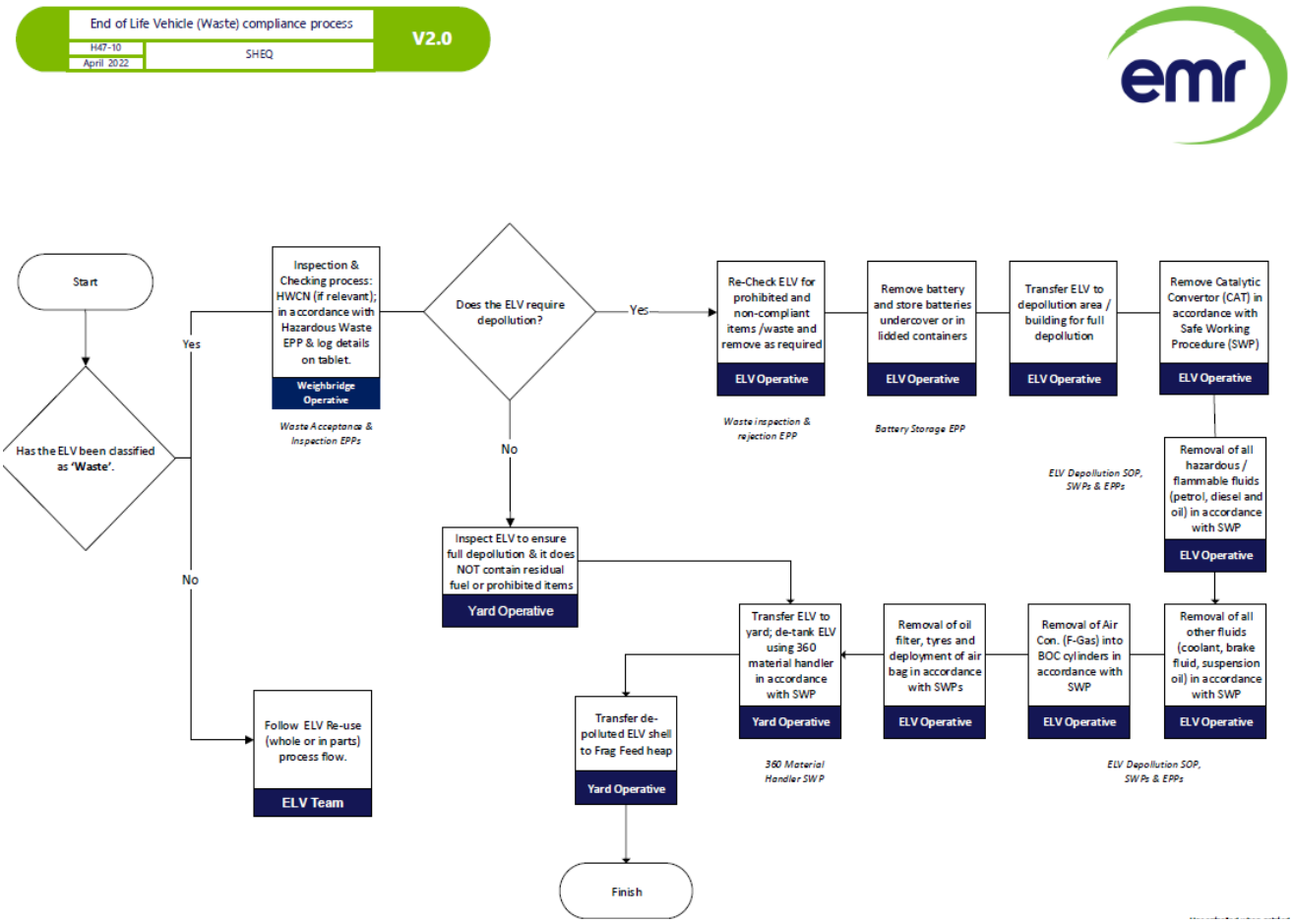
The Heavier metals leave the wheel, the media is removed (on a washing screen) and is transported on a conveyor to the outside of the main building where any ferrous metals are removed by a magnetic head drum.

The aluminium/ waste 'cut' is then passed over a washing screen to remove the media and where it is then directed into a barrel at a density of approximately 2200kg/m³. At this density any waste floats off and the aluminium sinks.

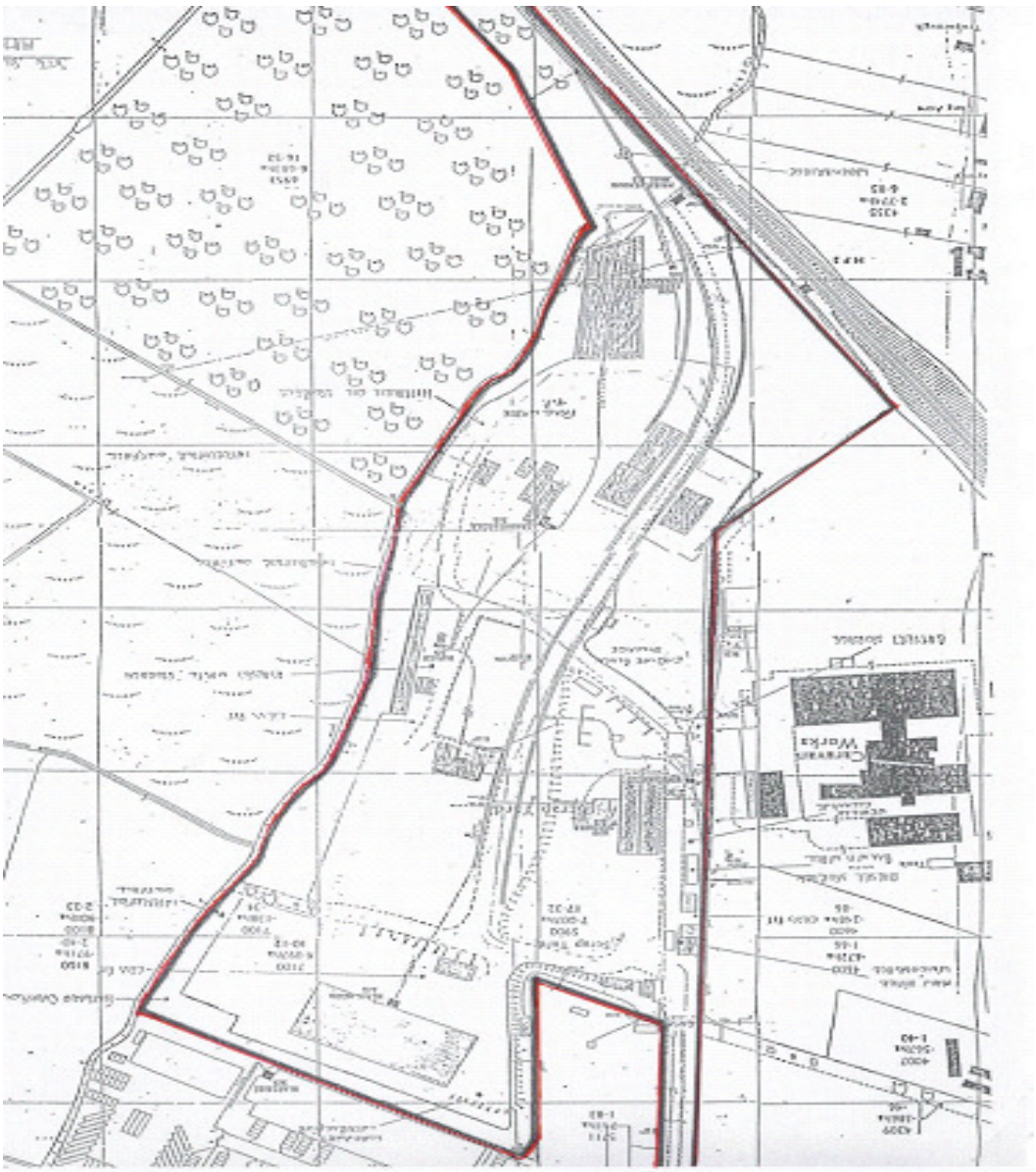
The waste is deposited into a bay post cleaning on a wash-screen whilst the aluminium cut, once cleaned, is sent over an Eddy Current Separator (ECS) for further refining. (The main function of the ECS is to separate aluminium and dropping stone, copper wire from ferrous materials).

The stone etc is then conveyed to a bay and is refined later. The aluminium passes through a drying barrel in order to ensure it is dried and therefore will not corrode and is held in a covered storage bay until sold.

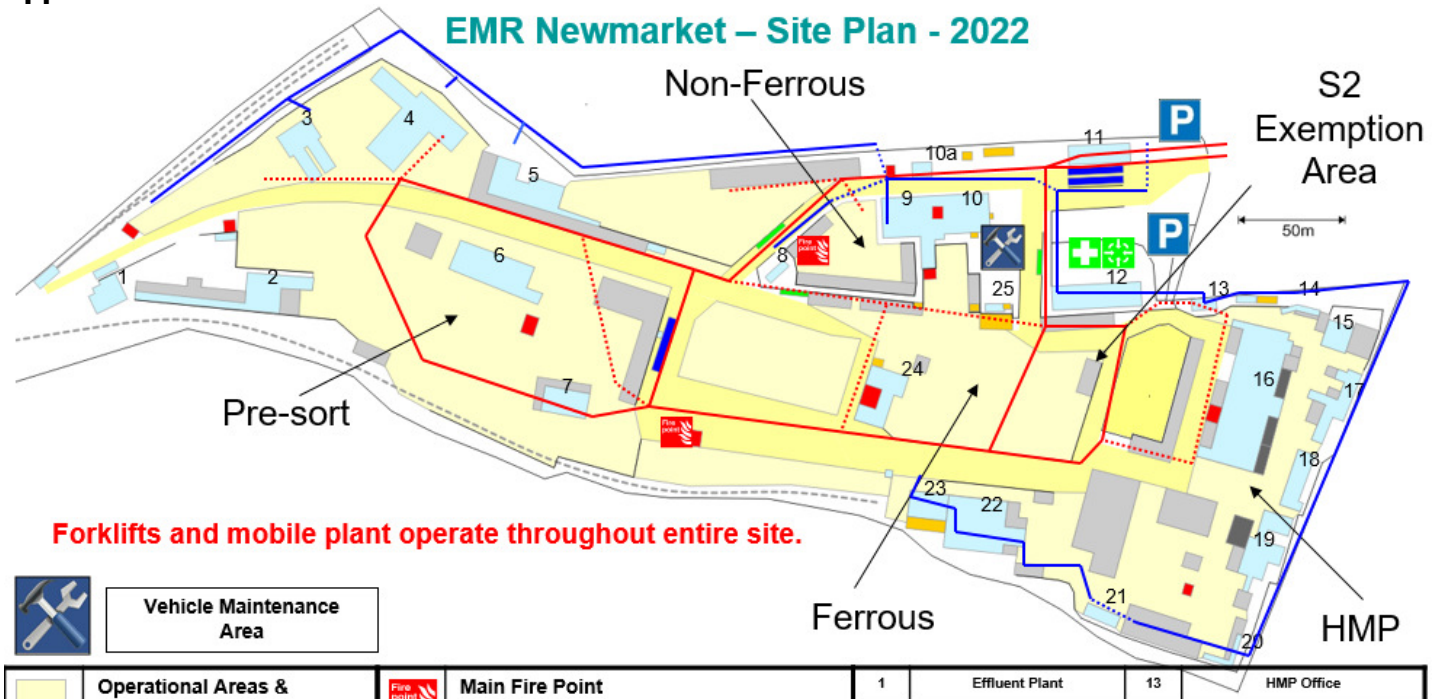
Appendix 5 – ELV Depollution



Appendix 6 - Permitted Site Boundary



Appendix 7 - Site Plan



	Operational Areas & Material Storage
	Buildings & Fixed Plant
	Fixed Storage Bays
	Substations, Transformers & Switch-rooms
	Flammable Material Storage (fuel, oils, gas)
	Weighbridges

	Main Fire Point
	Assembly Point
	First Aid
	Access Gantries / Fall Arrest
	Vehicle Routes
	Pedestrian Routes

1	Effluent Plant	13	HMP Office
2	Dust Plant	14	Picking Line 2
3	Centurions	15	FeSi Store
4	Gladiator	16	HMP 1
5	Steinert / Vibrosort	17	Stone Plant – Steinert / Vib
6	Screening Plant	18	Clarifier / Centrifuge
7	Air Plant	19	HMP 2
8	Crossroads Office	20	Picking Line 1
9	Metal Shed	21	HMP Steinert
10	Workshops / Stores	22	Scan-Sort
10a	Transport Workshop	23	ELV Depollution
11	Main Office / WBridge	24	Lefort Shear
12	Canteen / Welfare	25	Ferrous Office