

ENVIRONMENTAL MANAGEMENT SYSTEM

Environmental Innovation Centre, Campbeltown Road, Birkenhead, Wirral, CH41 9HP

Smart Creative Technologies Ltd

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Waste, Planning & Environmental Consultants



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THIS DOCUMENT IS DUE FOR REVIEW IN **JUNE 2024** OR AS A RESULT OF ANY INCIDENTS WHICH MAY LEAD TO THE REQUIREMENT FOR IMMEDIATE REVIEW, WHICHEVER IS THE SOONER

CONTENTS

DOCUMENT HISTORY:	I
CONTENTS	II
LIST OF TABLES:	IV
LIST OF APPENDICES:	V
SITE INFORMATION & KEY CONTACTS LIST	VI
1 GENERAL CONSIDERATIONS	1
1.1 SITE OPERATOR/PERMIT HOLDER	1
1.2 RELEVANT CONTACTS	1
1.3 PERMIT AREA/WASTE MANAGEMENT OPERATIONS.....	2
1.4 HOURS OF OPERATION	3
1.5 WASTE STORAGE, TYPES AND QUANTITIES	4
1.6 STAFFING AND MANAGEMENT	4
1.7 HEALTH AND SAFETY.....	4
1.8 FIT AND PROPER PERSONS.....	5
1.9 CONVICTIONS.....	5
2 SITE ENGINEERING AND INFRASTRUCTURE	6
2.1 SITE LOCATION	6
2.2 SITE DESCRIPTION	6
2.3 ACCESS AND PARKING.....	6
2.4 SITE OFFICE	7
2.5 NOTICE BOARD AND SIGNS	7
2.6 SITE SECURITY.....	8
2.7 FUEL STORAGE	9
2.8 REJECTED / QUARANTINED WASTE	9
2.9 DRAINAGE.....	9
2.10 VEHICLES, PLANT AND EQUIPMENT	10
2.11 PREVENTATIVE MAINTENANCE	10
3 SITE OPERATIONS	12
3.1 PRELIMINARY PROCEDURES	12
3.2 CHECKING & INSPECTION OF LOADS	13
3.3 WASTE ACCEPTANCE PROCEDURE.....	13
3.4 WEIGHING AND CATEGORISING LOADS	14
3.5 WASTE TREATMENT, HANDLING & STORAGE	14
3.6 POPs CONSIDERATION	18
3.7 WASTE GENERATION/REMOVAL & EXPORT	18
3.8 RECORD KEEPING	18
3.9 MANAGEMENT TECHNIQUES.....	21
3.10 SITE CLOSURE PLAN	21
4 ENVIRONMENTAL CONTROL, MONITORING AND REPORTING	23
4.1 BREAKDOWNS AND SPILLAGES	23
4.2 SITE DIARY / INSPECTION FORM	24
4.3 SECURITY MONITORING.....	24
4.4 CONTROL OF MUD AND DEBRIS	24
4.5 CONTROL OF DUST	24

4.6	ODOUR CONTROL	25
4.7	LITTER CONTROL & MANAGEMENT	25
4.8	CONTROL OF PESTS, BIRDS AND OTHER SCAVENGERS	26
4.9	CONTROL AND MONITORING OF NOISE & VIBRATION.....	26
4.10	COMPLAINT'S PROCEDURE.....	26
5	EMERGENCY PROCEDURES AND CONTINGENCIES	27
5.1	GENERAL	27
5.2	FIRE	28
5.3	SPILLAGES	28
5.4	ADVERSE REACTIONS	29
5.5	STAFF SHORTAGES.....	29
5.6	ADVERSE WEATHER CONDITIONS.....	29
5.7	OPERATIONAL FAILURE.....	29
5.8	BOMB SCARE	30
6	TRAINING FOR SITE STAFF	31
6.1	TRAINING NEEDS ASSESSMENT	31
6.2	SITE RULES AND INFRASTRUCTURE TRAINING.....	31
6.3	EMERGENCY PROCEDURES TRAINING.....	31
6.4	FIRE SAFETY / FIREFIGHTING TRAINING	32
6.5	RECOGNITION OF WASTE TYPES TRAINING	32
6.6	STORAGE AREAS / LIMITS TRAINING	33
6.7	VEHICLE / PLANT PREVENTATIVE MAINTENANCE TRAINING.....	33
6.8	DUTY OF CARE TRAINING	33
6.9	PLANT OPERATION TRAINING.....	34
6.10	PERMIT / MANAGEMENT SYSTEM.....	34
6.11	TRAINING FOR CONTRACTORS.....	34

List of Tables

Table 1.1 – Permitted Operations.....	3
Table 1.2 - Staffing Levels	4
Table 2.1 - Site office information	7
Table 2.2 - Plant & Equipment	10

List of Appendices:

Appendix I - Drawings

Drawing No. CAM/3020/01 – Site Location Map

Drawing No. CAM/3020/02 – Permit Boundary Plan

Drawing No. CAM/3020/03 – Site Layout and Fire Plan

Appendix II - Record Keeping Forms (advisory only)

SCT/RF/2 - Rejected Waste

SCT/RF/4 - Site Diary/Inspection Form

SCT/RF/6 - Employee Training Needs Assessment / Review

SCT/RF/7 - Complaints Form

Appendix III - Environmental Permit

Appendix IV - Health & Safety – Conditions of Site Use for Staff and Visitors

Site Information & Key Contacts List

Site Address:	Environmental Innovation Centre, Campbeltown Road, Birkenhead, Wirral, CH41 9HP		
Site Operator:	Smart Creative Technologies Ltd	National Grid Ref:	SJ 32752 87508

CONTACT	DESCRIPTION	OFFICE HOURS	OUT OF HOURS
Jonathan James Quinn Prashant Singh Chew Cheng Keat Martin Anthony Blake Peter John Bibby	Directors	0151 294 4460	07885 775804
Joe Grant	TCM	0151 294 4460	07547 415529
St Catherine's Hospital Church Road, Birkenhead, Merseyside, CH42 0LQ	General Enquiries	0151 514 2888	999
	NHS Direct	111	999
Gladstone Medical Centre 241-247 Old Chester Road, Lower Tranmere, Birkenhead, Merseyside, CH42 3TD	Local Doctor Surgery (GP)	0151 645 2306	999 or 111
Merseyside Police Birkenhead Police Station Mortimor Street, Birkenhead, CH41 5EU	Local Police Non-Emergency	0151 709 6010 / 101	999 or 112
	Police Emergency	999 or 112	999 or 112
Merseyside Fire & Rescue Service Birkenhead Community Fire & Ambulance Station Exmouth Street, Birkenhead, CH41 4NF	Fire and Rescue Service (in Emergency Dial 999)	0151 296 5325 (non-emergency)	999 or 112
Environment Agency	Environmental Regulator	03708 506 506	0800 80 70 60
Wirral Council PO Box, 290, Wallasey, CH27 9FQ	Environment, Street Services & Planning	0151 606 2000	999 or 112
Water Plus	Mains water and sewerage supplier	0345 072 6072	0345 072 6072
<u>Oaktree Environmental Ltd</u> - Lime House, 2 Road Two, Winsford, Cheshire CW7 3QZ	Specialist waste and permitting compliance advisors	01606 558833	01606 558833

1 General Considerations

1.1 Site Operator/Permit Holder

1.1.1 Smart Creative Technologies Ltd (the operator) will operate an Environmental Permit (EP) for the physical treatment of hazardous waste comprising the acceptance, storage and treatment of Waste Electrical and Electronic Equipment from the industrial sector in the form of scrap printed circuit boards (PCBs) and x-ray film.

1.1.2 Developments in legislation and the regular increases in the Landfill Tax have increased the need for effectiveness and scope of operations at waste transfer and recycling centres, leading to greater recovery rates for recyclable waste.

1.2 Relevant Contacts

1.2.1 The registered Companies House address and contact details for the operator are shown below:

Smart Creative Technologies Ltd
Environmental Innovation Centre
Campbeltown Road
Birkenhead
CH41 9HP

Contact: Jonathan Quinn
Position: Director
Phone 0151 294 4460

1.2.2 Oaktree Environmental Ltd have been engaged to act as consultants for Smart Creative Technologies Ltd to assist in the preparation of this Environmental Management System (EMS). This EMS has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and the Environment Agency's (EA's) Guidance: "*Develop a management system: environmental permits*".

1.2.3 Contact details for Oaktree Environmental are as follows:

Oaktree Environmental Ltd	Contact: Chris Parry
Lime House	Position: Senior Consultant
2 Road Two	Tel: 01606 558833
Winsford	E-mail: chris@oaktree-environmental.co.uk
Cheshire CW7 3QZ	

1.2.4 A full list of relevant contacts (including key emergency contact numbers) is provided in the Site Information & Key Contacts List section in the pre-pages of this document.

1.3 Permit Area/Waste Management Operations

1.3.1 The permit boundary is outlined in green on Drawing No. CAM/3020/02. All references to 'the site' in this EMS shall mean this area and the associated infrastructure, plant and equipment. This EMS should be read in conjunction with the site's Fire Prevention Plan (FPP) which is referenced as CAM-3020-B.

1.3.2 The EP is required for the storage (keeping) prior to removal, and treatment (all types of handling/processing) of waste. Waste treatment processes to be carried out on site will include chemically treating scrap printed circuit boards (PCBs) and x-ray film using nitric acid and ferric chloride in a batch process. The PCBs and x-ray film are immersed in processing liquor and then the solution is neutralised with sodium hydroxide to precipitate the metals from the solution. The precipitate is filtered, washed and then oven dried. The remaining components are segregated and then dispatched for further processing and recycling off site.

1.3.3 Specified waste management activities and associated limits (including and waste recovery operations) are listed in the table below:

Table 1.1 – Permitted Operations

Description of activities	Limits of activities
<p>R3: Recycling/reclamation of organic substances which are not used as solvents</p>	<p>Waste types as specified in the EP.</p>
<p>R4: Recycling/reclamation of metals and metal compounds</p>	<p>Wastes shall be stored for no longer than 3 years prior to recovery.</p>
<p>R5: Recycling or reclamation of other inorganic materials D15: Storage of waste pending disposal (The D15 code refers to the storage of such waste pending its disposal)</p>	<p>All treatment of waste shall be carried out inside a building.</p>
<p>R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>All storage and treatment of waste must take place on an impermeable surface with sealed drainage</p>

1.4 Hours of Operation

1.4.1 The site will be open during the following hours for the delivery, receipt and processing of waste:

Monday to Friday	08:00 – 17:30
Saturday	Closed
Sundays, Bank/Public holidays	Closed

1.4.2 The only activities on site which will be permitted outside of these hours are onsite maintenance works, emergency deliveries of waste/plant/machinery and general office use.

1.4.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised vehicular and/or pedestrian access.

1.5 Waste Storage, Types and Quantities

- 1.5.1 The locations of the operational and storage areas are shown on Drawing No. CAM/3020/03.
- 1.5.2 The waste types to be accepted at the site are defined in the Controlled Waste (England and Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990.
- 1.5.3 The throughput of the site will be limited to approximately 2 – 3 tonnes per day which equate to a maximum of 1,000 tonnes per annum. To break this down further, approximately 750 tonnes per annum for PCBs and 250 tonnes per annum for x-ray film.
- 1.5.4 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.

1.6 Staffing and management

- 1.6.1 The table below details the minimum number of staff when the site is open for the reception and processing of waste and also available to tackle a fire on site. Only the site manager, machine/plant operators and general operatives will be permitted to tackle fires on-site.

Table 1.2 - Staffing Levels

Position	Employees	Responsibilities
Site Manager	1	Overseeing day to day site operations
TCM (weekly)	1	Ensuring the site is being operated in accordance with Environmental Permit and in-line with attendant regulations
Machine/Plant Operatives & Drivers	1	Waste handling/processing, reception and plant operation

1.7 Health and safety

- 1.7.1 All operations on site will be 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 IV. These conditions will be 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.

1.8 Fit and proper persons

1.8.1 The site will assign a Technically Competent Manager (TCM) who provide the required attendance time at the facility as required by guidance periodically issued by the EA. A copy of the appointed TCM's Certificate of Technical Competence (COTC) will always be made available in the site office.

1.8.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with the EP and this EMS document in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person. If either the TCM or deputy is changed, the EA will be informed of the change and the relevant details of the replacement as soon as possible.

1.9 Convictions

1.9.1 At the time of application, neither Smart Creative Technologies Ltd nor any of the relevant people within the company had been convicted of a relevant offence.

2 Site Engineering and Infrastructure

2.1 Site location

2.1.1 The site is located at Environmental Innovation Centre, Campbeltown Road, Birkenhead, Wirral, CH41 9HP as shown on Drawing Nos. CAM/3020/01 and CAM/3020/02. The National Grid Reference of the site is SJ 32752 87508.

2.2 Site Description

2.2.1 All storage and processing of any waste material and hazardous substances will take place inside a building. The site consists of a building which has a designated fully bunded area for waste storage and processing and an external yard used only for loading and unloading the waste and materials required for the operation.

2.3 Access and Parking

2.3.1 Access to the site is via the A41 and then onto Campbeltown Road. Adequate parking for staff and visitors is available.

2.4 Site Office

2.4.1 The site office will be located as shown on Drawing No. CAM/3020/03. The documents listed below will be retained in the site office.

Table 2.1 - Site office information

Documents to be retained in site office
The Environmental Permit (original & any subsequent variations)
This Environmental Management System (EA agreed document)
The 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 (kept for 5 years)
Waste delivery tickets
Accident book (& 1st aid kit)

2.5 Notice Board and Signs

2.5.1 A notice board will be erected at the site entrance displays the following information:

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

2.5.2 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.

2.6 Site Security

- 2.6.1 The permitted site is located within a secure building (Campbeltown Road) as shown on Appendix I. All doors to the Unit building are locked when the offices are unoccupied. These security measures are clearly shown on Drawing No. CAM/3020/03 and are considered suitable.
- 2.6.2 All CCTV cameras are monitored by up to 6 members of Smart Creative Technologies Ltd staff during operational hours and out-of-hours. If there is a trigger or suspicious unusually activity i.e. arson, flames, smoke, staff negligence, the CCTV system will send an alert by text and email and the staff will review the footage contact the site before ringing the emergency services. This manual step is necessary to prevent numerous false alarms i.e. if an animal walks past the cameras.
- 2.6.3 The site security measures (fencing/gates) will be inspected daily and any defects which impair the effectiveness of the security will be repaired to the same or better standard. All repairs will be noted on the site diary within 24 hours of the event.
- 2.6.4 If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented.

2.7 Fuel storage

2.7.1 The site does not currently store any fuels/oils on site. If the site were to store fuel on site the following procedures apply:

- Tanks are surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank.
- All pipework and associated infrastructure will be enclosed within the bund.
- A lock will be fitted to the tank valve to prevent unauthorised operation.
- All valves and gauges on the bund will be constructed to prevent damage caused by frost.

2.7.2 The tanks will be clearly marked showing the product within and also its capacity.

2.8 Rejected / quarantined Waste

2.8.1 Due to the acceptance criteria set up it is unlikely that any nonconforming waste will be found in any of the loads accepted on site. However, a rejected waste container will be available on site for the deposition of unauthorised waste (including quarantined waste). The container will be kept separate from other wastes which are stored on the site and no wastes that are stored within it shall be kept for longer than 7 days. A note will be made in the site diary of all wastes placed within and removed from the container accompanied by all the relevant documentation.

2.9 Drainage

2.9.1 The area of the building used to process the incoming waste has been provided with a sealed drainage system by constructing a bunded wall.

2.10 Vehicles, Plant and Equipment

2.10.1 Waste will be handled using the plant listed below. Only trained operators will be permitted to drive/operate the plant. Any changes to the list will be notified to the EA prior to implementation.

Table 2.2 - Plant & Equipment

Item	Number	Function
Forklift truck	1	Loading/unloading/movement/sorting of waste
Ultrasonic bath	1	Part processing of PCBs
Plastic loading baskets.	1	Temporary storage of PCBs
Filter press and IBCs.	1	Part processing of PCBs
Extraction hood over the Ultrasonic bath.	1	Part processing of PCBs
1 tonne reactor	1	Part processing of PCBs
Weighing scales	1	Weighing of incoming/outgoing wastes

2.10.2 Note: The plant/equipment on site may vary and additional equipment may be hired-in to cope with busy periods, larger jobs or jobs with specific requirements.

2.11 Preventative maintenance

2.11.1 There will be a forklift truck on site which will be subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts.

2.11.2 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 CAM/3020/03 following cessation of activities and external separation distances of 6m are observed between plant and any combustible or flammable material.

- In the building, all plant will be powered-down and completely shut off prior to cessation of operations on any given day.
- Plant which is not in use for any extended period is stored at least 6 metres from combustible or flammable material.
- All mobile plant will contain firefighting equipment inside.

2.11.3 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 will be 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 Appendix III of this document. The site will be used for the acceptance, storage and processing of waste using Smart Creative Technologies Ltd's own vehicles/contracts and also for third-party users/hauliers whose details would be checked prior to the delivery/collection of waste.
- 3.1.2 The procedures below would be followed prior to the receipt of waste on site.
- 3.1.3 For in-house collections, the driver employed by the permit holder will arrive at the waste producer's 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) 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 at the recycling centre 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.
 - f) Where the load contains soil from an industrial site the EA may be contacted for advice to ensure that the load to be removed does not contain contaminated soil.

3.2 Checking & Inspection of Loads

- 3.2.1 The site only accepts one waste stream i.e. scrap printed circuits boards and these are received from selected sources. All persons delivering waste to the site are required to report to the site office upon arrival at the site.
- 3.2.2 Where a controlled waste transfer note or hazardous waste consignment note accompanies a consignment of waste the note will be checked to ensure that it accurately describes the type and quantity of waste. If the waste does not meet the description stated on the controlled waste transfer note the customer will be 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 will be advised to contact the Environment Agency to find an alternative site.
- 3.2.3 A visual inspection of incoming wastes will be carried out by a designated Smart Creative Technologies Ltd's employee, and the accompanying paperwork (if any) will be checked. Once Smart Creative Technologies Ltd's consignments have been checked they will be taken to the storage area in the building to await treatment.
- 3.2.4 During the inspection of the waste, the operator will ensure that no capacitors, batteries and other components containing harmful substances enter the process.

3.3 Waste Acceptance Procedure

- 3.3.1 All incoming vehicles upon arrival are required to report to the person in charge of waste acceptance at the site. The details of the load will be recorded and the duty of care note/company documentation will be further checked by the operator to ensure that the load is acceptable at the site, including a visual check prior to the vehicle proceeding to the tipping area. Any deviation from the procedures or problems with any loads will result in tipping facilities being suspended for the offending company. Loads which are not acceptable within the above terms will be rejected.

3.3.2 The site will look to only treat only two waste codes comprising:

- 09 01 07 - photographic film and paper containing silver or silver compounds comprising x-ray film only
- 16 02 15* - hazardous components removed from discarded equipment comprising printed circuit boards only

3.4 Weighing and Categorising Loads

3.4.1 The weight of Smart Creative Technologies Ltd (PCBs) will be measured using scales as described in Section 2.6.1.

3.5 Waste Treatment, Handling & Storage

3.5.1 Once a consignment of PCBs or X-ray film has been accepted (in accordance with Section 3.1) and is found to comply with the conditions of the environmental permit the following procedure will apply:

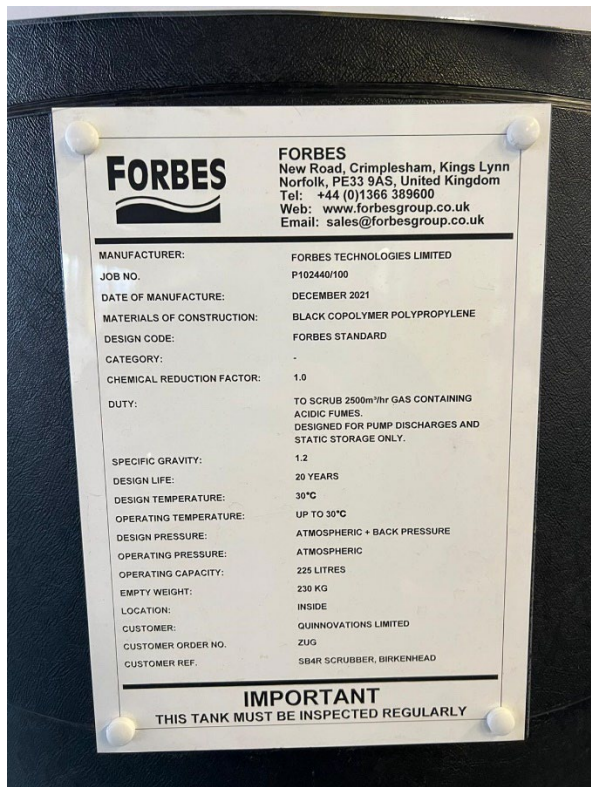
- i) The consignment will be checked, the weight of Smart Creative Technologies Ltd will be recorded for the purpose of producing evidence notes for the Smart Creative Technologies Ltd and as part of the data required for the process. It will then be taken to the Smart Creative Technologies Ltd processing and storage area within building.
- ii) During the treatment process, the procedures shown below will be undertaken:
 - All valves will be checked they are in the correct running position.
 - In terms of the PCBs, all large components e.g. copper coils, heat sinks on the PCBS will be removed.
 - The nitric acid/ferric chloride solution is prepared for the ultrasonic bath.
 - The PCBs/film will be placed into the plastic basket will is then loaded into the ultrasonic bath containing the nitric acid and ferric chloride solution.

- Extraction hood is placed on top of the bath and switched on. The extraction hood will be used to extract nitric acid/hydrochloric acid vapours through the scrubber as detailed in section 3.6.3. The extraction hood and scrubber is then linked then discharges the clean emissions into the atmosphere via a 2.7m high, 0.4m wide flue from the roof of the existing building.
- The process temperature and time the PCBs and film are submerged will be carefully recorded. The boards are immersed for 30 minutes under ultrasonic agitation.
- When the PCBs and film are clean the ultrasonic process is switched off, but the extraction system is left running for 10 more minutes and then switched off.
- The plastic basket is raised using the electric hoist to enable the PCBs and boards to drain.
- The basket is then transferred and lowered into the wash tank and the PCBs and film are hosed down which may result in the small components detaching themselves from the PCBs and film.
- These components will be collected and segregated. All the components of the PCBs and film will be removed and placed in segregated containers for removal off site for further processing or recovery.
- The PCBs / film are then removed from the basket and loaded into one tonne sacks for sale and despatch
- When the acid solution is exhausted it is transferred to the main reactor passing through a 1/16" mesh strainer.
- The drain valve on the ultrasonic bath is open and the recycle valve to the bath is closed.
- Once the drain valve is closed the agitator is switched on. The air pump is started. This continues for 15 minutes ensuring all protective covers and drainage trays are in position on the plate and frame filter press.
- The reactor drain pump is switched on to allow the solution to pass through the filter press.
- The solution is pumped from the filter press through PVC pipework into an IBC. When the reactor vessel is empty the valves are closed, protective covers from the filter press removed, the press is then vented to the IBC.

- The operator then finally releases the pressure on the filter plates, the plates are opened, and the filter cake is removed. The cake is transferred into plastic drums to await dispatch off site.

3.5.2 The temperature of the extraction solution in the processing tank must be continuously measured and documented. The same applies during the preparation of the extraction solution in the mixing tank. Appropriate measures and technical aids must be taken to prevent the temperature from rising above 35 degrees Celsius (e.g. absolute compliance with the order in which individual substances are added).

3.5.3 The air above the extraction bath and the exhaust air from the mixing tank is routed through a gas scrubber. The efficiency of the elimination process is to be demonstrated by means of continuous, quantitative analysis for nitrous gases, chlorine and nitrosyl chloride on a quarterly basis and consecutive production days at the gas scrubber outlet. The scrubber is capable to scrub 2,500m³/hr of the gas containing these acidic fumes. Details of the scrubber are shown below:



3.5.4 The main materials produced from the process include used PCBs, microchips, wire, copper coils, aluminium, plastic, silver and mixed filter cake. These are then sent off site for further processing and recovery. The plastic and filter cake are likely to comprise hazardous waste so this will be sent to a suitable permitted hazardous waste facility, all other waste is considered non-hazardous and will be sent to a suitably permitted metal recycling site. The material produced from x-ray film is likely to comprise silver which will also be sold, exported or sent to a suitably permitted site.

3.5.5 The filter cake, the filtrate (extraction solution) and the rinsing water will be analysed quantitatively for each batch (corresponds to an exhausted extraction solution) by a laboratory accredited in the UK (taking into account the limits of determination possible according to the state of the art) for at least the following substances:

- PCB
- Mercury
- Cadmium
- Hexavalent Chromium
- Polybrominated biphenyls
- Polybrominated diphenyl ethers
- Bis(2-ethylhexyl)phthalate
- -butyl benzyl phthalate
- -dibutyl phthalate
- diisobutyl phthalate
- benzotriazole
- imidazole
- benzimidazole

3.5.6 The exhausted extraction solution (filtrate) and the water from the three washing tanks are to be collected in suitable (sealed) IBCs and sent to a suitably permitted hazardous waste facility.

- 3.5.7 The operator will not mix or treat the PCBs and film in the same process, they will be subject to the same treatment procedure but during occurrences to prevent cross-contamination of any potential POPs material arising from the PCB processing as detailed in the next section.

3.6 POPs consideration

- 3.6.1 It is expected the PCBs will contain levels of POPs, hazardous brominated flame retardants and antimony trioxide above concentration limits. Nickel may also be present, therefore, all residual waste produced following the treatment of PCBs to will be disposed of at a suitably permitted incineration facility
- 3.6.2 The physical treatment aspect can process approximately 20 tonnes before it needs filtering and neutralising meaning this process will take place every 2 weeks. It will take approximately 4-5 hours to perform the neutralisation process.

3.7 Waste generation/removal & export

- 3.7.1 If chemicals escape during delivery or removal, the liquid in the retention basin (lift shaft) must be properly disposed of as hazardous waste. The lift shaft must be empty before every delivery and every removal.
- 3.7.2 Containers containing oil and other water-polluting liquids of 20 litres, and more are to be stored above drip pans. The volume of the collection tray must be at least as large as the contents of the largest container stored above this tray. The container store must be reported to the AFU before the system is put into operation. For the storage of chemicals, this will be done so in accordance with

3.8 Record keeping

- 3.8.1 Smart Creative Technologies Ltd use detailed waste transfer and product notes in paper and electronic form to ensure compliance with the Waste Duty of Care Code of Practice - March

2016 (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 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.
- 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)
- 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.
- the quantity and nature and whether it is loose or in a container, if in a container, the type of container
- the time and place of the transfer
- the SIC code of the transferor (current holder of the waste)
- 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)
- 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)

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

- a paper WTN and form to fill in or alternative documentation e.g. an invoice, as long as it contains all the required information.

- 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.

3.8.3 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.

3.8.4 **Hazardous waste:** The site will be accepting any hazardous waste into the site and this will be done so using a fully completed hazardous waste consignment note. The records of which will be kept for 5 years.

3.8.5 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 below:

- 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)

3.8.6 Outcomes of inspections of waste types, hardstanding areas, transfer/treatment areas, storage areas, drainage channels, etc. are recorded using the site inspection form SCT/RF/4 or similar document and detailed comments are entered into the site's diary (including action taken or proposed).

3.8.7 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.

3.8.1 Complaints will be recorded; SCT/RF/7 is included as an advisory. Section 4.9 demonstrates further action on the event of any complaints received.

3.9 Management Techniques

3.9.1 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.

3.9.2 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 dispatch 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.

3.10 Site Closure Plan

3.10.1 In the event that the site ceases to operate 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 residual processed and unprocessed 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.
- 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, alternative plant will be brought on site until it is repaired. If alternative plant cannot be sourced then waste will be stored securely until the plant is repaired. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages.
- 4.1.2 As there is a risk of contamination on the concrete pad from unloading of waste, additional spill kits will be provided in this area in the event pallets are dropped or broke during unloading. Site staff will be trained to identify any spills in this area and use the procedures below to prevent anu contaminants entering adjacent surface water drains.
- 4.1.3 Any spillages of fuel/oil will be cleared immediately by depositing sand or absorbents on the affected area. The sand or absorbents will be placed in a skip/container to be taken to a suitably permitted site for disposal. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur. Spillage clearance procedures are detailed in Section 5.3.
- 4.1.4 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 temporarily suspended.

4.2 Site diary / inspection form

A site diary for the purpose of recording site activities will be maintained in addition to record form SCT/RF/4. The diary will also be used to record any other information relevant to the working of the site. The following information will be recorded in the diary/record forms required by the EP:

- i) The identity of the signature of the inspection personnel;
- ii) The date and time of the inspection (or event);
- iii) The inspection details and any actions taken; and,
- iv) The name of the nominated deputy in the absence of the site manager.

4.3 Security monitoring

4.3.1 As the site has security infrastructure in terms of gates/fencing, CCTV and alarms; no further monitoring i.e., security guard patrols will be carried out.

4.4 Control of mud and debris

4.4.1 Although unlikely to present a problem, due to the nature of the waste accepted and site surfacing of the site, visual inspections of the site will be carried out daily (see SCT/RF/4). However, staff will report any problems with mud or debris at the site immediately to the site manager.

4.5 Control of dust

4.5.1 The containment and nature of waste within the site and all waste treatment being inside a building present a very low risk of dust.

4.5.2 If dust were to become a problem at the site, there is a permanent water supply available, and the operator may look to install additional suppression such as bowsers or dust cannons. Any external water pipes will be lagged to prevent frost damage during winter months.

4.6 Odour control

4.6.1 There is no odour risk associated with the wastes to be accepted at the site i.e. PCBs but a risk assessment of the associated storage of liquids has revealed that the detection of noticeable odour inside the building but this is unlikely to stray outside the buildings for the following reasons:

- i) The containment of all liquids within the building and the strict waste acceptance criteria presents a very low risk of odour nuisance.
- ii) All doors will be fully locked during any treatment process
- iii) If malodorous waste is detected after deposit it will remain inside the container and marked as rejected and placed in quarantine for removal off site as soon as practicable.
- iv) The containment of the recovery process within a purpose-built industrial building will reduce the likelihood of such a hazard occurring.
- v) All liquids are stored in sealed containers.

4.6.2 Odour checks will be carried out daily and results recorded on the inspection form for the site (i.e. record form SCT/RF/4 or the operators own recording form). Any identified operations / storage giving rise to odour will mean cessation of operations.

4.6.3 The site will have a complaints procedure similar to the information shown in SCT/RF/7 and will be rigorously enforced should a third-party complaint be received from a public or private source.

4.7 Litter control & management

4.7.1 Although unlikely to present a problem, due to the nature of the waste accepted, containment measures and site surfacing of the site, visual inspections of the site will be carried out daily (see SCT/RF/4). However, staff will report any problems with litter at the site immediately to the site manager.

- 4.7.2 When staff carry out inspections for litter on and off site they will collect the litter and place it in a skip for recovery before the end of the working day. Regular checks including four over a 24-hour period of the areas immediately beyond the site boundary will be carried out by site operatives. In the event of high winds, the frequency of checks may increase to reduce the risk of complaints.

4.8 Control of pests, birds and other scavengers

- 4.8.1 The containment and nature of waste within the site and all waste treatment being inside a building present a very low risk of pest occurrences.
- 4.8.2 If any occurrences of pests are noted, a pest controller will be called to site to eradicate the problem within a suitable timescale agreed with NRW.

4.9 Control and monitoring of noise & vibration

- 4.9.1 All waste treatment will be done so inside an enclosed unit and the location of the site being >150m from any sensitive receptors with large industrial properties and a busy railway line in between means noise associated with the proposed operations will not greatly increase the existing noise level in the surrounding area. The waste operations are carried out inside an industrial building and will be carried out always using the Best Practicable Means.
- 4.9.2 Although unlikely to present a problem, due to the site treatment processes, any noise related issues will result in staff reporting problems to site management.

4.10 Complaint's procedure

- 4.10.1 All complaints are recorded using a form like SCT/RF/7. The form as a minimum will include a record of the complaint, particulars of the complainant and details of any action taken to alleviate the problem.

5 Emergency procedures and 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 NRW of any serious injuries to employees of Smart Creative Technologies Ltd, 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 accident book on site. 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 The site will have an NRW approved FPMP (Document Ref. CAM-3020-B) which all staff are required to be familiar with and know of its location i.e. in the site office.

5.2.2 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 USING THE MAIN ACCESS GATES 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 ON THE SITE OR WHO SIGNED IN TO THE VISITOR'S BOOK ARE ASSEMBLED SAFELY
- h) INFORM ALL NEIGHBOURING PREMISES WHO ARE LIKELY TO BE AFFECTED
- i) INFORM THE NATURAL RESOURCES WALES
- 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 Spillages

5.3.1 All fuel stored on site is bunded to contain any fuel leaks. If oil and vehicle maintenance chemicals are kept on site these will be stored securely. If any spills occur a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted landfill. No chemical leaks are expected in the waste handling area but should they occur

the procedures outlined in Section 5.4 will apply. Any wastes which would be classified as having the potential to cause polluting runoff are stored within the concrete area which is a sealed drainage system.

5.4 Adverse reactions

5.4.1 No wastes are accepted which will react to present such a hazard. If unauthorised waste is found in a load and does present such a hazard the same procedures as for the deposit of drums (above) shall apply.

5.5 Staff shortages

5.5.1 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.

5.6 Adverse weather conditions

5.6.1 As all waste will be stored inside a building, it is considered that the issue of high winds, poor visibility, droughts, floods, freezing conditions will not hamper the site operations.

5.7 Operational failure

5.7.1 The 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.

5.8 Bomb scare

- 5.8.1 In the unlikely event of a bomb scare, the site will be evacuated and the police contacted. The police will then assume control of the site until the threat has been verified or the device defused and removed. NRW will be kept informed of the events on site.

6 Training for site staff

6.1 Training needs assessment

6.1.1 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.

6.1.2 An employee training record will be available at the site detailing information similar to SCT/RF/6 in Appendix II and 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.

6.2 Site rules and infrastructure training

6.2.1 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.

6.2.2 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.

6.3 Emergency procedures training

6.3.1 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.

6.3.2 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.

6.4 Fire safety / firefighting training

6.4.1 Management must provide all employees with appropriate fire safety training with regard to their individual responsibilities.

6.4.2 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 6.3).

6.4.3 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 6.1.

6.5 Recognition of waste types training

6.5.1 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 site's 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 NRW to agree a suitable method for removal.

6.5.2 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 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.

6.6 Storage areas / limits training

6.6.1 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.

6.6.2 Employees in these roles must also be trained to recognize storage limits to ensure that they are in accordance with those specified in Section **Error! Reference source not found.**

6.7 Vehicle / plant preventative maintenance training

6.7.1 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.

6.7.2 Training will be in accordance with Section 3.5 of this document and will be based on the preventative maintenance schedule supplied by the plant/equipment manufacturer.

6.7.3 The same training will be provided to senior management enabling a dual-level maintenance programme.

6.8 Duty of care training

6.8.1 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.

6.9 Plant operation training

6.9.1 Any employees who are required to operate loading or treatment plant for the movement or processing of waste will be required to undertake the necessary qualifications for the operation of the specific item of plant in question. This will be required prior to operating the plant and will be obtained through necessary external certification programmes.

6.9.2 Regardless of general plant operation certification, all operatives will be fully inducted in the operation of the specific make and/or model of plant used on site.

6.10 Permit / management System

6.10.1 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 site's operating conditions.

6.11 Training for contractors

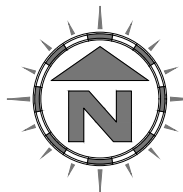
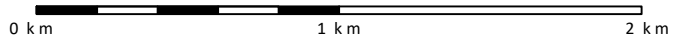
6.11.1 General site training will be provided to any contractors who are working on the site on a temporary basis as described in Sections 6.2, 6.3 and 6.4 above.

6.11.2 Additional training will be provided to contractors in their area of expertise. If they are dealing with specific items of plant/equipment/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

Scale Bar (1:25,000)



NOTES

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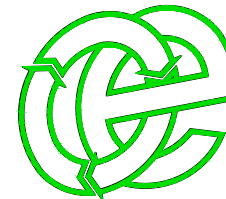
REVISION HISTORY

Rev:	Date:	Init:	Description:
-	28.03.22	CP	Initial drawing

KEY:

 Site location

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
SITE LOCATION MAP

CLIENT
Smart Creative Technologies Ltd

PROJECT/SITE
Environmental Innovation Centre,
Campbeltown Road, Birkenhead, Wirral,
CH41 9HP

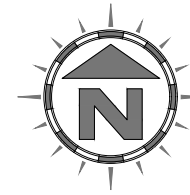
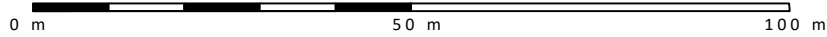
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DRAWING NUMBER	REV	STATUS
CAM/3020/01	-	Issued

DRAWN BY	CHECKED	DATE
CP	--	28.03.22

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

Scale Bar (1:1,000)




NOTES

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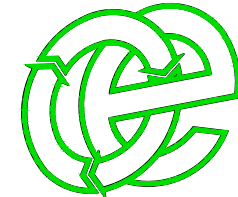
REVISION HISTORY

Rev:	Date:	Init:	Description:
-	28.03.22	CP	Initial drawing

KEY:

 Permit boundary

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
PERMIT BOUNDARY PLAN

CLIENT
Smart Creative Technologies Ltd

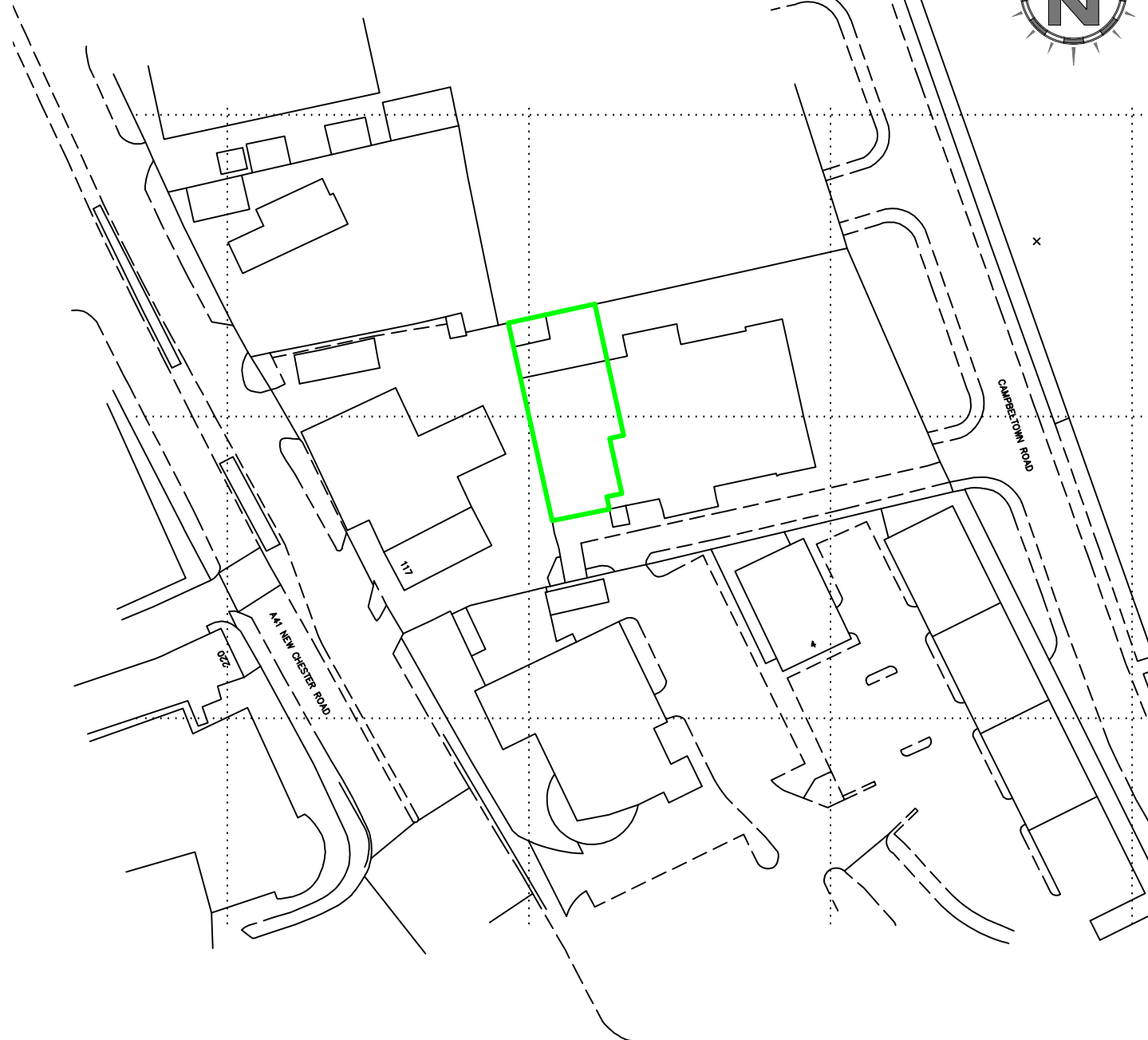
PROJECT/SITE
Environmental Innovation Centre,
Campbeltown Road, Birkenhead, Wirral,
CH41 9HP

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DRAWING NUMBER	REV	STATUS
CAM/3020/02	-	Issued

DRAWN BY	CHECKED	DATE
CP	--	28.03.22

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

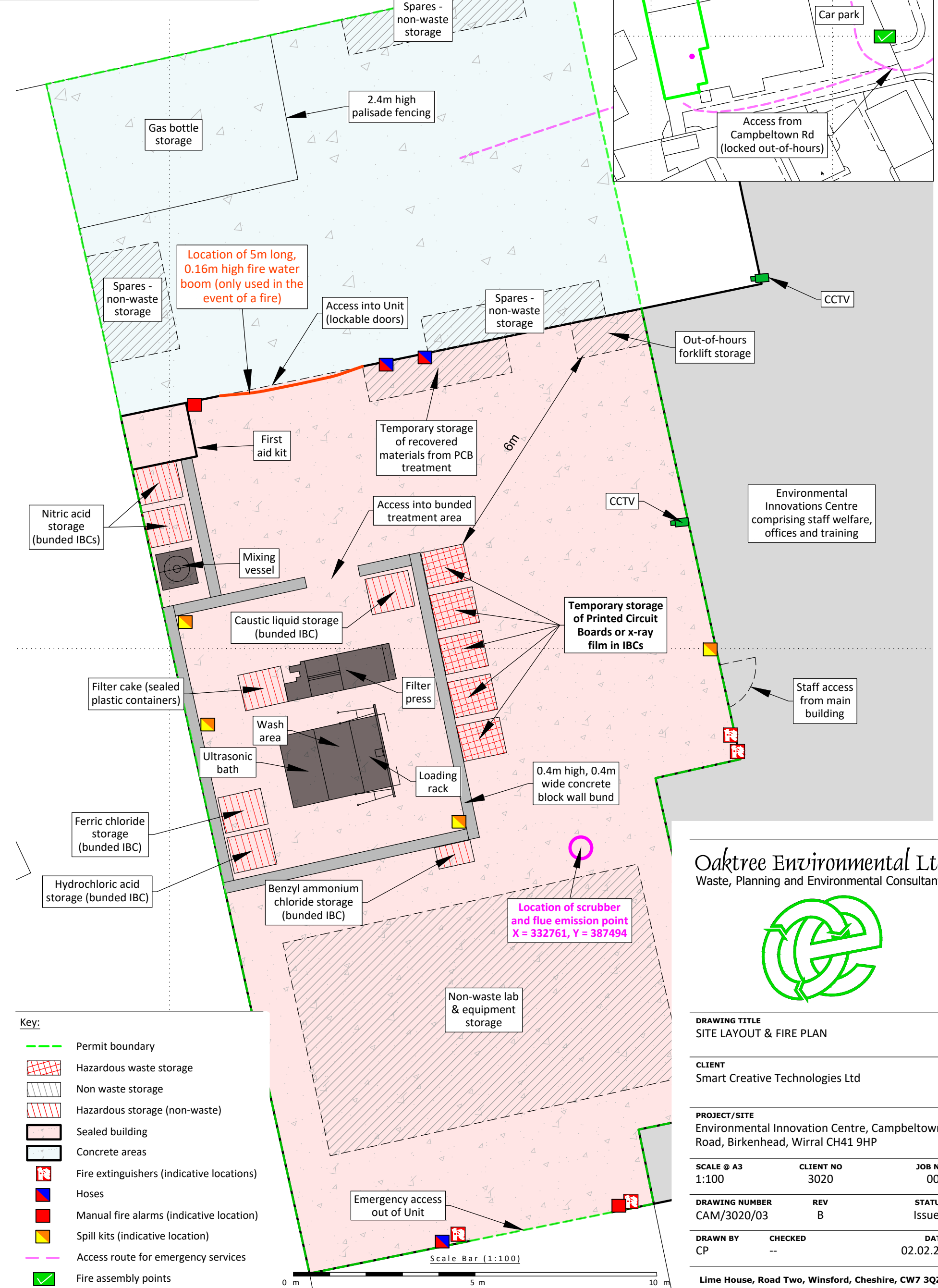
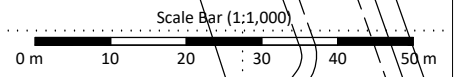
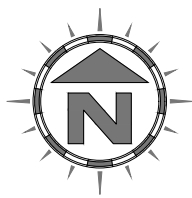


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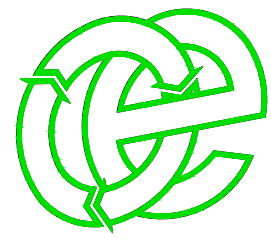
Rev:	Date:	Init:	Description:
-	28.03.22	CP	Initial drawing
A	30.03.22	CP	Client comments
B	02.02.23	CP	EA / operator comments



- Key:**
- - - Permit boundary
 - Hazardous waste storage
 - Non waste storage
 - Hazardous storage (non-waste)
 - Sealed building
 - Concrete areas
 - Fire extinguishers (indicative locations)
 - Hoses
 - Manual fire alarms (indicative location)
 - Spill kits (indicative location)
 - - - Access route for emergency services
 - ✓ Fire assembly points



Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
SITE LAYOUT & FIRE PLAN

CLIENT
Smart Creative Technologies Ltd

PROJECT/SITE
Environmental Innovation Centre, Campbeltown Road, Birkenhead, Wirral CH41 9HP

SCALE @ A3 1:100 **CLIENT NO** 3020 **JOB NO** 001

DRAWING NUMBER CAM/3020/03 **REV** B **STATUS** Issued

DRAWN BY CP **CHECKED** -- **DATE** 02.02.23

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

Appendix II

Record Keeping Form

**SMART CREATIVE TECHNOLOGIES LTD
REJECTED WASTE - RECORD FORM SCT/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	

SMART CREATIVE TECHNOLOGIES LTD								
SITE INSPECTION FORM – SCT/RF/4								
WEEK STARTING								
TYPE OF INSPECTION	FREQ	DAY						
		M	T	W	T	F	S	S
SITE ENTRANCE/NOTICE BOARD	WEEKLY							
SECURITY - GATES	WEEKLY							
SECURITY - FENCING	WEEKLY							
SITE ROADS (CLEAR FROM HAZARDS)	DAILY							
BUILDING INFRASTRUCTURE (INTERNAL)	DAILY							
BUILDING INFRASTRUCTURE (EXTERNAL)	DAILY							
IMPERMEABLE CONCRETE AREAS	DAILY							
KERBING / SEALS AROUND SITE	DAILY							
UNDERGROUND STORAGE TANK	MONTHLY							
DRAINS CLEAR & FUNCTIONING	DAILY							
SITE SURFACES SUITABLE	WEEKLY							
WASTE CONTAINERS	DAILY							
REJECTED WASTE TYPES / STORAGE	WEEKLY							
NOISE LEVELS	DAILY							
FIRES (ANY INCIDENTS REPORTED)	DAILY							
NO SMOKING SIGNS IN PLACE	MONTHLY							
SPILLAGES & ABSORBENTS	DAILY							
LITTER	DAILY							
DUST	DAILY							
ODOUR	DAILY							
VERMIN	DAILY							
RECORDS	WEEKLY							
COMPLAINTS RECEIVED	AS REQUIRED							
OTHER (SEE NOTES BELOW)	AS REQUIRED							
INSPECTION CARRIED OUT BY								
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):								
CHECKED BY					SIGNATURE			
POSITION					DATE			
<i>Sheet</i>					<i>of</i>			

SMART CREATIVE TECHNOLOGIES LTD - EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW (SCT/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:							

**SMART CREATIVE TECHNOLOGIES LTD
COMPLAINTS REPORT FORM (SCT/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 SCT/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 treatment/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 Smart Creative Technologies Ltd 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 tip at the facility shall follow the instructions of the operator and shall only tip in the designated area, unless advised otherwise. No tipping shall take place over sorted stockpiles.
- 16) Drivers must remain in the cab or stand well clear of the vehicle during loading or tipping. 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 Smart Creative Technologies Ltd 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.