

**European Metal Recycling Ltd.**

**Variation of Environmental Permit EPR/AB3903KF  
Non-Technical Summary & Supporting Information**

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European Metal Recycling Ltd.  
Boreham Industrial Estate  
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## **1 INTRODUCTION**

### **1.1 Overview**

European Metal Recycling Ltd (EMR) operates a metal recycling facility within the Boreham Industrial Estate, Waltham Road, Boreham, Essex CM3 3AW. The reception and treatment of wastes, including those associated with metal recycling, Waste Electrical and Electronic Equipment (WEEE), and End-of-Life Vehicles (ELV)), are authorised by the Environment Agency (EA) under Environmental Permit ref. EPR/AB3903KF.

Prior to EMR, the permit was held by SITA MR Ltd, who operated the site as a waste transfer station, including metal recycling and ELV. The permit was transferred to EMR on 28<sup>th</sup> November 2013.

EMR has applied to the EA to vary permit EPR/AB3903KF to remove/amend sections which are no longer relevant to their operations, and to include the discharge of surface water drainage to a controlled watercourse.

The proposed changes detailed in the application include:

- Amendment of the metal recycling section (A1), including R/D codes and List of Waste codes
- Amendment of the waste transfer station section (A2) to remove detail no longer relevant to the current operations (leaving wastes associated with WEEE and uPVC window frames only).
- Amendment of the ELV section (A3), including R/D codes and List of Waste codes.
- Addition of a new activity to authorise surface water discharge to a controlled watercourse.

As detailed in later sections, the proposed changes typically relate to the removal of waste types accepted by the permit, therefore not increasing the risk posed by the operations.

### **1.2 Scope of Document**

This Non-Technical Summary (NTS) provides supporting information relevant to the application to vary Permit EPR/AB3903KF, including a description of the proposed changes.

## **2 AMENDMENT OF METAL RECYCLING FACILITY (A1) ACTIVITY**

### **2.1 Capacity (Part C4, Table 1a)**

Due to the absence of a maximum daily treatment capacity on the current permit, we have not provided a maximum quantity of metal wastes that will be treated per day. However, the maximum hazardous waste treatment capacity will remain at 10 tonnes per day.

The maximum annual limit for wastes associated with the metal recycling facility will remain at 100,500 tonnes.

**2.2 EWC codes required for Table S2.2 PART A – Metal Recycling Facility**

The List of Waste (LoW) codes required for the metal recycling facility are identical to those listed in the Standard Rules SR2015 No.14 (Metal recycling site), with the addition of the following code which is required to reflect the potential change in waste classification of non-WEEE cables.

<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES</b>
<b>17 04</b>	<b>Metals (including their alloys)</b>
17 04 10*	cables containing oil, coal tar and other hazardous substances

All of the required LoW codes are currently listed within permit EPR/AB3903KF, with the exception of 16 01 21\* (hazardous vehicle components – catalytic converters containing RCF matting) which was added to the standard rules to reflect the reclassification of catalytic converters. There is therefore no increase in risk posed by the waste types accepted.

**2.3 Activities (including WFD Annex I and II Operation Codes)**

The metal recycling facility will involve the following treatment activities (as currently stated in the permit):

*Sorting, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, or cutting of waste into different components for recovery.*

The relevant Recycling Codes taken from the Waste Framework Directive (WFD) Annex I and II are:

R4: Recycling/ reclamation of metals and metal compounds

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

**3 AMENDMENT OF WASTE TRANSFER STATION (A2) ACTIVITY**

**3.1 Capacity (Part C4, Table 1a)**

The maximum non-hazardous waste treatment activity will remain at 50 tonnes per day.

The maximum hazardous waste treatment capacity will remain at 10 tonnes per day and there will be no treatment of fridges.

The maximum annual limit for wastes associated with the waste transfer station will remain at 75,000 tonnes.

### 3.2 EWC codes required for Table S2.2 PART B – Waste Transfer Station

The List of Waste (LoW) codes required for the waste transfer station are identical to those listed in the Standard Rules SR2015 No.15 (Waste electrical and electronic equipment authorised treatment facility (ATF) excluding ozone-depleting substances), with the addition of the following two codes which are required for the acceptance of uPVC window frames.

<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES</b>
<b>17 09</b>	<b>Other construction and demolition wastes</b>
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03.
<b>20</b>	<b>MUNICIPAL WASTES...</b>
<b>20 01</b>	<b>Separately collected fractions (except 15 01)</b>
20 01 39	Plastics

The following LoW code is also required for fridges (storage only):

<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>
<b>16 02</b>	<b>Waste from electrical and electronic equipment</b>
16 02 11*	Discarded equipment containing chlorofluorocarbons, HCFC, HFC

These changes will result in a significant reduction in waste types accepted by the site, namely by removing those associated with the previous operations carried out by SITA.

All of the required LoW codes are currently listed within permit EPR/AB3903KF, with the exception of 16 02 11\* which is the non-municipal version of 20 01 23\* which is already accepted by the permit. The addition of these waste types therefore does not increase the risk posed.

#### *Activities (including WFD Annex I and II Operation Codes)*

The waste transfer station will involve the following treatment activities (as currently stated in the permit):

***Sorting, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, repair or refurbishment, or cutting of waste into different components for recovery.***

The relevant Recycling Codes taken from the Waste Framework Directive (WFD) Annex I and II are:

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

D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary

storage, pending collection, on the site where it is produced)

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

#### **4 AMENDMENT OF END-OF-LIFE VEHICLE FACILITY (A3) ACTIVITY**

##### **4.1 Capacity (Part C4, Table 1a)**

Due to the absence of a maximum daily treatment capacity on the current permit, we have not provided a maximum number of ELVs that will be treated per day. However, the maximum hazardous waste treatment capacity will remain at 10 tonnes per day.

The maximum annual limit for wastes associated with the End-of-Life Vehicle facility will remain at 5,000 tonnes.

##### **4.2 EWC codes required for Table S2.2 PART C – End-of-Life Vehicle Facility**

The List of Waste (LoW) codes required for the end-of-life vehicle activity are identical to those listed in the Standard Rules SR2015 No.13 (Vehicle storage, depollution & dismantling (authorised treatment) facility).

All of the required LoW codes are currently listed within permit EPR/AB3903KF, with the exception of 16 01 21\* (hazardous vehicle components – catalytic converters containing RCF matting) which was added to the standard rules to reflect the reclassification of catalytic converters. There is therefore no increase in risk posed by the waste types accepted.

##### **4.3 Activities (including WFD Annex I and II Operation Codes)**

The End-of-Life Vehicle facility will involve the following treatment activities (as currently stated in the permit):

***Sorting, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, or cutting of waste into different components for recovery.***

The relevant Recycling Codes taken from the Waste Framework Directive (WFD) Annex I and II are:

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

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

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

## **5 ADDITION OF AN ACTIVITY TO AUTHORISE SURFACE WATER DISCHARGE**

### **5.1 Description of drainage system**

All site surface water run off from impermeable surfaces will pass into the drainage system (there is no direct runoff at perimeter of site), the drains will then feed the surface water runoff through a full retention interceptor. Once the runoff has passed through the interceptor, clean effluent will be discharged to surface water (brook to the west of the site) in Portland Grove Wood. The outfall shut off / penstock valve will be closed and locked off (with a padlock) at all times during normal operational hours and when normal site activities are taking place, with the TCM as the designated padlock key holder / controller.

At the end of normal operational hours (and provided there have been no environmental incidents such as fires, major spillages etc.), the outfall shut-off valve will be unlocked and opened, water allowed into the sump to be inspected (to ensure that there is no visible oil / significant odour / other pollutants) and if clear, allowed to be discharged to outfall. The following morning before site operations commence again the outfall will be shut off again and locked during operational hours of the following day and the process repeated during an operational week. At weekends, the outfall, which would have been shut off and locked until 16:30 Friday afternoon (end of normal working hours), is then unlocked and opened for the remainder of the weekend until the site re-opens again on Monday morning.

### **5.2 Maintenance and Monitoring**

The surface water runoff at the outfall will be inspected (in the sump) by the TCM prior to discharge (see EPP3.5). The outfall will also be inspected visually once per day (recorded in the site diary / log) and a water sample will be taken for laboratory analysis once per quarter (submitted for a range of parameters including biological oxygen demand (BOD), chemical oxygen demand (COD), total suspended solids, mineral oil, metals (zinc, copper, iron etc.).

If there are any major spillages, fires or other potentially polluting environmental incidents then the outfall will remain closed until any potential pollutants have been cleared (e.g. clearance by tanker of interceptor following a fire) and the TCM has inspected the site, the outfall and the drain water (for discharge). Once all clear the TCM will be able to confirm the unlocking and opening the unlocking of the outfall (at the end of normal site operating hours).

### **5.3 Discharge Point**

The surface water, once discharged through the interceptor is discharged to a brook to the West of the site in Portland Grove Wood. The final discharge point on site is marked as 'SW1' on the site plan (ref. 14754/001 Rev A).

## **6 ADDITIONAL APPLICATION DOCUMENTS**

### **6.1 Risk Assessment and Environmental Management Plan**

A copy of the current Environmental Management Plan (EMP) and environmental risk assessment has been submitted with the application. As the variation relates to the removal of activities/waste types rather than their addition, the current EMP and environmental risk assessment are already reflective of the current operations.

There is currently no fire prevention plan (FPP) in place for EMR Boreham. The proposed changes do not increase the risk of a fire occurring, nor do they increase the environmental risk if a fire occurs. An FPP therefore has not been included with the application.

### **6.2 Site Plan**

An updated site plan has been provided (separately (ref '14754/001 Rev A') identifying the current site layout and discharge point.

### **6.3 Proof of Operator Competence**

The original WAMITAB certificates (ref. 5137482 and 5143447) and the current continuing competence certificate (ref. 5169866) for the proposed provider of operator competence (Darrell Rose) have been provided with the application.