

Overall permit variation Summary

As an ITAD business, Tier1 aims to meet waste hierarchy expectation for our customers while remaining within the many requirements for EEE and WEEE overall. Primarily working and suitable material would not need to be treated as waste and will be treated with care as such.

We offer both a service offering alongside our sorting requirements of an ATF.

We would like to meet the expectations of a WEEE ATF as, previously; we were an AATF under the previous company, EOL.

We will operate under

Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities.

Also, our business requirements to are to maintain our BS8887 kitemark for remanufacture, ISO 14001, ISO 9001, ISO 45001, ISO 27001, CAS-S, PASF, Cyber essentials and Cyber essentials plus.

Future requirements also include other certifications for R2, ISO 14064 (organisations GHG). ISO 26000 for social responsibility, ISO 22301 for security and resilience, ISO 31000 for risk, ISO 37001 for anti-bribery, ISO 37301 for compliance management and ISO 50001 for energy management

Ultimately, we would like to remain competitive within the ITAD industry but are aware of the limitations of scale our site provides.

Summary of Changes

- Add shredding activity to the permit, limited to 1000 tonnes per year (10 tonnes per day)
- Add the activities and EWC codes from the T11 exemption to the waste permit, however maintaining the permits overall limit to receive of 4999 tonnes of WEEE or 14,997 tonnes of all activity
- Change the site name from EOL to Tier1
- Add EWC codes: -
 - 16 02 15*
 - o Hazardous components removed from discarded equipment
 - 19 02 04*
 - Premixed wastes composed of at least one hazardous waste
 - 16 02 14
 - Discarded equipment other than those mentioned in 16 02 09 to 16 02 13
 - 16 02 16



- Components removed from discarded equipment other than those mentioned in 16 02 15
- 20 01 40
 - o Metals
- 20 01 34
 - o Batteries and accumulators other than those mentioned in 20 01 33
- 16 02 11*
 - o discarded equipment containing chlorofluorocarbons, HCFC, HFC

Additional detail

Change the site name.

Please may we have the site name changed from E O L IT services to Tier1 Asset Management Limited

Permit NP3194NS - Tier 1 Asset Management Limited			
Permit number	NP3194NS		
Legacy permit number			
Permit holder name	Tier 1 Asset Management Limited		
Date issued	01/03/2006		
Permit status	Effective		
Permit iteration			
Site name	E O L I T Services		
Site address	1-3 Baltic Wharf, Station Road, Maldon, Essex, CM9 4LQ		
Site postcode	CM9 4LQ		
Primary activity type			
Primary activity type Other activity type	A11: Household, Commercial and Industrial Waste Transfer Station		
	A11: Household, Commercial and Industrial Waste Transfer Station TL8534207381		

We would like to add to the permit.

Previously requested.



- Permission to shred hard drives and dismantled mobile phones this would mean adding the shredding activity to the permit.
 - This will exceed the RPS309 storage and shredding limits of 5 tonnes
 - Shredding activity at Maldon is limited to 10 tonnes per day
- Add code 19 02 04* Premixed waste for accepting shredded material (onsite shredding activities)
 - o Material will be received as R13 and then stored for downstream recycling
- Add codes 16 02 15* for components removed, toner cartridges, WEEE cable etc.
- Add the activities and EWC codes of the T11 to the to the permit so we may operate
 under the permit alone and get ahead with the proposed exemption changes this will
 include the EWC codes mentioned.

Additional Changes

Below is a summary of the further changes and requests.

The reason is to allow our business to better sell ourselves and assist more broadly in office clearance jobs.

We would like to add the following EWC codes further to our permit

- 16 02 15*
 - To allow for single or dual coding with 16 02 16. This is to allow for the receipt of loose components such as loose hard disk drive that require data sanitisation beyond reuse of destruction by shredding.
- 16 02 16
 - To allow for dual coding with 16 02 15* and non-hazardous components examples may include metal-based monitor stands or metal heatsinks
- 19 02 04*
 - To allow for the receipt of material such as shredded hard disk drives that may have been shredded during an onsite job
- 20 01 40
 - To allow us to accept and code metals such as server rails or for empty 31U data cabinets
- 16 02 14
 - To allow for dual coding with 16 02 13* where required and to allow for individual use such as 31U cabinets that may still be populated with less than 5% plastics
 - Units populated with more than 5% or may still have server equipment present will be given the dual hazardous and non-hazardous codes of 20 01 35* & 36



• 20 01 34

 To allow us to accept and code batteries such alkaline when loose and not in the devices. This would not be for an overall acceptance of large number of batteries as a service.

16 02 11*

- To allow us to accept and code equipment contain refrigerants such a fridges, air conditioners or water coolers.
- The intention is not to bring this equipment in alone and where possible with air conditioners we would prefer only to receive items that are evidenced as degassed and using the 20 01 35* & 36 EWC codes.
- Original mention the code was for 20 01 21* but realised this could be limiting
- Packaging will be bought in under the NWFD #2, however we will retain the S2
 exemption until such time we are not permitted to.
 - Packaging bought in as part of the service offering. Will be likely be owned by Tier1. As we will take ownership before the collection takes but charges should be made for handling.
 - Material will be flat packed where possible and placed directly in the covered skips of the yard ready for collection by downstream partner.
 - Where possible it will not be stored inside unless the skip is full and due an exchange. Should it need to be it will only be until the exchange has taken place.
 - The intention is not to bring in vast amounts, it's simply to cover a collection request and ensure what we collect can be covered and is present on our licence. None of which we wish to treat either beyond sorting and making safe and environmentally sound for further transport. None of which would extend beyond our existing limits annually, I believe.

EWC code and limits tables

Below is a summary of the EWC codes and the storage limits and annual acceptance limits. We do not believe that the overall acceptance limit needs to change. However, we would like to have our metal to be limited to 56 the same as the other overall storage limits. Taking the total to 112 tonnes, not including batteries.

Total treatment levels will be limited to 10 tonnes any given day.

<u>Row</u>			Annual Acceptance
<u>Labels</u>	EWC Code	Storage limit at any given time overall	<u>limit</u>
Batteries	16 06 01*	12 Tonnes	
Batteries	16 06 02*		4999 Tonnes
Batteries	16 06 05		4999 Tolliles
Batteries	20 01 33*		



Batteries	20 01 34		
Metal	16 02 16	56 Tonnes	
Metal	16 02 14		
Metal	20 01 40		
WEEE	16 02 13*	56 Tonnes	
WEEE	16 02 15*		
	16 02 15* &		
WEEE	16		
WEEE	19 02 04*		
WEEE	16 02 11*		
WEEE	20 01 35*		
	20 01 35* &		
WEEE	36		

However, in order to remain a waste operation and not an installation we will be working with the below limits.

Row Labels	Catego ry group	EWC Code	EWC description (as per WM3)	Mat erial limit ed to stor age at one	Overall material maximum limit onsite (Each element)	Over all mat erial maxi mu m limit onsi
		16 06 01*	Lead batteries			
	Dattavi	16 06 02*	Ni-Cd batteries	12		
	Batteri es	20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	Tonn es	12 Tonnes (including Non- hazardous)	
		16 02 11*	WEEE containing chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and hydrofluorocarbons (HFCs)		50 tonnes (including total of hazardous batteries being	118 tonn es
Hazard		16 02 13*	Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12			
ous	ous WEEE	16 02 15*	Hazardous components removed from discarded equipment			
		16 02 15* & 16	Hazardous components removed from discarded equipment	, ,		
		19 02 04*	premixed wastes composed of at least one hazardous waste		stored)	
		20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components			
		20 01 35* & 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing			



			hazardous components			
Non Hazard ous Metal/ Non Hazard ous WEEE	Batteri	16 06 05	other batteries and accumulators	12	12 tonnes (Including	
	20 01 34	batteries and accumulators other than those mentioned in 20 01 33	Tonn es	Hazardous)		
		16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	FC FC	FO Town or and reliable of	
	Hazard 16 02 16 02 01	components removed from discarded equipment other than those mentioned in 16 02 15	56 Tonn	56 Tonnes excluding weight of hazardous WEEE material		
			Metals	es	also in storage	

The table below outlines how the codes will be integrated into our AMO system, when booking requests take place and waste is involved

Category Group	EWC Code	Category Names
Batteries	16 06 01*	Lead acid batteries, UPS - Batteries
Batteries	16 06 02*	Nickel Cadmium Batteries
Batteries	16 06 05	Laptop Batteries, Li-ion NiMH-(not including cadmium or Mercury)
Batteries	20 01 33*	Unsorted hazardous batteries (Mercury, Cadmium)
Batteries	20 01 34	Unsorted Non Hazardous batteries (Alkaline, Zinc Chromium)
Metal	16 02 16	Monitor Stnd/Base (Under approx 5% cable or plastic present)
Metal	16 02 14	Network Cabinet Large >31U (Under approx 5% cable or plastic present), Network Cabinet Small <30U (Under approx 5% cable or plastic present)
Metal	20 01 40	Server rails
WEEE	16 02 13*	CRT Monitor, PC - All in one/Combo, Projector Screens, UPS
WEEE	16 02 15*	Media-Hard Drive-Loose, PCB card
WEEE	16 02 15* & 16	Cables, Monitor Stnd/Base (Over approx 5% cable or plastic present), Toner
WEEE	19 02 04*	Shredded Hard Drive, Shredded Phones, Shredded Tape
WEEE	20 01 35*	Air Con Unit (Confirmed degassed), LCD Monitor
WEEE	20 01 35* & 36	Data Bearing appliance, Data Media (Media Tapes, CD/DVD/FDD), Dockstat/Portrep, Epos Equipment, Handheid Device, Interact Whitebrd, Laptop, Laptop Hybrid, Media-CD/DVD/FDD, Media-Memory Keys and Cards (Data Media), Media-Tapes, Mobile Phone, Network Cabinet Large >31U (Over approx 5% cable or plastic present), Network Cabinet Small <30U (Over approx 5% cable or plastic present), PC, Peripherals, Printer Desktop MFD, Printer Floor Standing, Projector, Scanner, Server, Server Blade, Server Blade Enclosure, Small Mixed WEEE, Switch/Hub/Router/APs, Tabets, Tape Library, Telephone Desk, Terminal
WEEE	16 02 11*	Refrigeration (Pentane)

Dust control of shredding

Shredding of hard disk drives and mobile devices

- Hard drives or mobile devices will be shredded indoors and into either agri sacks or tote boxes directly and closed
- The upper lid will be closed both for safety and to prevent dusts escaping
- The floor surrounding the shredder will be swept daily and sweepings kept in the shredded material to be recycled with the main material.
- The shredder will be wiped down on no more than a quarterly basis to remove excess dust using cloth or tissues. These will be kept out of main waste and sent to a suitable outlet for destruction.
- HDD shredding is limited to 1000 tons as a combined weight of all material carried out annually
- Monitoring will take place through downstream recording
- The shutter door will remain closed during operations and especially on windy days
- The shredder is kept away from and operated from the shutter area to minimise the risk of dust escaping along with cleaning and sweeping

