

ENVIRONMENTAL MANAGEMENT SYSTEM

The Breakers Yard, Barracks Road, Assington, Sudbury, Suffolk, CO10 5LP

Assington Autos Limited

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Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants



Oaktree Environmental Ltd, Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ
Tel: 01606 558833 | E-Mail: sales@oaktree-environmental.co.uk | Web: www.oaktree-environmental.co.uk
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Appendix II - Record Keeping Forms

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Site Information & Key Contacts List

Site Address:	The Breakers Yard, Barracks Road, Assington, Sudbury, Suffolk, CO10 5LP		
Site Operator:	Assington Autos Limited	National Grid Ref:	TL 93749 37466

Contact	Description	Office Hours	Out of Hours
Frederick Cook	Director	01787 210 519	07377 721452
Jape Daly	Site/Operations Manager & TCM	01787 210 519	07377 721452
Charlotte Malone	Compliance Manager & TCM	01787 210 519	07377 721451
<u>Colchester Hospital</u> Turner Road, Turner Road, Colchester, Colchester, Essex, CO4 5JL	Local NHS Hospital (Main)	01206 747474	999
	Accident & Emergency (A&E)	112	999
<u>The Mill Surgery</u> Church Street, Boxford, Colchester, Suffolk, CO10 5DU	Local Doctor Surgery (GP)	01473 822961	999 or 112
<u>Suffolk Constabulary</u> Acton Lane, Sudbury CO10 1QN	Local Police Non-Emergency	01473 613500	999
	Police Emergency	999	999
<u>Suffolk Fire & Rescue Service</u> Sudbury Fire Station Gregory Street, Sudbury CO10 1BA	Fire and Rescue Service (in Emergency Dial 999)	01473 260588	01480 444500 / 999
<u>Environment Agency</u> Cobham Rd, Ipswich IP3 9JD	Environmental Regulator	03708 506 506	0800 80 70 60
<u>Suffolk County Council</u> Town Hall, Market Place, Macclesfield, SK10 1EA	Local Planning Authority - First Response Team (Emergency)	0345 606 6067	999
<u>Anglian Water</u>	Local Water Supplier / Sewerage Provider	03457 145 145	03457 145 145
<u>Oaktree Environmental Ltd</u> Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ	Specialist Advisor (Waste and Planning Issues)	01606 558833	999 / 0800 80 7060

1 General Considerations

1.1 Site operator/permit holder

1.1.1 Assington Autos Limited (the operator) operates EPR/EB3800UW which is a SR2011No3 Environmental Permit (EP) which was originally issued on 23/12/2013 and transferred to the current operator (Assington Autos Limited) on 22/01/2017. The operator has recently applied to the Environment Agency (EA) in order to vary their Environmental Permit (EP) as per the following:

- i) Vary the permit from a Standard Rules (SR2011No3) to a bespoke permit.
- ii) Increase the tonnage to <30,000 tonnes per annum
- iii) Part Surrender – Reduce the current permit boundary which overlaps land not within control of the operator. It must be noted the area of the site being surrendered has never been used for any waste operations and was applied for during the original application in error.
- iv) Increase the permit boundary.
- v) Include additional waste types to the permit which are not permitted on some standard rules permits allowing the operator to receive waste vehicle parts from garages, business and other waste management sites. ELVs and scrap metal will be accepted from members of the public and also from the commercial, industrial and agricultural sector.

1.2 Relevant contacts

1.2.1 The registered office address and contact details for the operator is as follows:

Assington Autos Limited
Unit 6, Quebec Wharf
Thomas Road
Limehouse
London
United Kingdom
E14 7AF

Contact: Fred Cook
Position: Director
Tel: 01787 210 519

1.2.2 Oaktree Environmental Ltd have been engaged to act as consultants for Assington Autos Limited 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 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-
Cheshire CW7 3QZ		environmental.co.uk

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

1.3 EMS

1.3.1 This EMS has been prepared to meet the requirements of the following:

- The Environmental Permitting (England and Wales) Regulations 2016
- Develop a management system: environmental permits
- Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste
- The Waste duty of care: code of practice – 2018
- Non-hazardous and inert waste: appropriate measures for permitted facilities published 12/07/2021.

1.4 Permitted operations

1.4.1 The Environmental Permit is required for the storage (keeping) prior to removal, and treatment of waste comprising ELVs, ELC components and scrap metal. Waste treatment processes to be carried out on site will include the following:

- Compacting (by loading shovel/360° excavator)
- Sorting (with loading shovel/360° excavator or by hand)
- Separation (by using appropriate mechanical screening plant and equipment)
- Baling (by using appropriate plant and equipment)
- Depollution and dismantling of waste motor vehicles

1.4.2 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC; and are shown in the table overleaf:

Table 1.1 - Permitted activities (ELVs)

Table 2.1 Activities	
Description of Activities	Limits of Activities
<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>R3: Recycling/reclamation of organic substances which are not used as solvents</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic materials</p>	<p>Treatment consisting only of depollution of waste motor vehicles and sorting, separation, baling, compacting, or cutting using hand-held equipment only, of waste into different components for recovery.</p> <p>There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes.</p> <p>There shall be no treatment including the decanning of catalytic converters, other than sorting and separating from other wastes.</p> <p>The maximum quantity of hazardous waste treated for disposal or recovery shall not exceed 10 tonnes per day. This does not include the manual depollution and dismantling of waste motor vehicles.</p> <p>Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery.</p> <p>The maximum quantity of hazardous waste stored at the site shall not exceed 50 tonnes at any one time of which no more than 10 tonnes shall be stored for disposal. This does not include waste motor vehicles awaiting manual depollution.</p> <p>No more than 50 tonnes of intact waste vehicle tyres (waste code 16 01 03) shall be stored at the site at any one time. No more than 25 tonnes of waste vehicle batteries (waste code 16 01 01* or 16 06 05) shall be stored at the site at any one time.</p> <p>No more than 10 tonnes of intact waste vehicle catalytic converters (waste code 16 01 21* or 16 01 22) shall be stored at the site at any one time.</p>

Table 1.2 - Permitted activities (MRS)

Table 2.1 Activities	
Description of Activities	Limits of Activities
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)	Treatment consisting only of sorting, separation, grading, baling, compacting, and cutting using hand-held equipment only, of ferrous metals or alloys and non-ferrous metals into different components for recovery. There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes. Wastes shall be stored for no longer than 3 years prior to recovery.
R4: Recycling/reclamation of metals and metal compounds	The maximum quantity of hazardous waste stored at the site shall not exceed 50 tonnes at any one time. There shall be no treatment including the decanning of catalytic converters, other than sorting and separating from other wastes. No more than 10 tonnes of intact waste vehicle catalytic converters (waste code 16 01 21* or 16 01 22) shall be stored at the site at any one time

1.5 Hours of operation

1.5.1 The site will be operated according to the hours specified below:

- 06:00am – 06:30am (Monday – Friday) = HGVs comprising 2 no. 8 car transporters and 1 no. 4 transporter leave the site to begin their collection of ELVs. The transporters return to the site no later than 16:00pm. The amount of movements depend on the travel time of the HGV.
- 07:30am (Monday – Saturday) = Staff arrive at the site in cars.
- 08:00am – 17:30pm (Monday – Friday) = All operations permitted comprising depollution of waste motor vehicles and sorting, separation, compacting, or, of waste into different components for recovery.
- 08:00am – 17:00pm (Monday – Friday) = Arrival and removal of HGVs unloading and loading waste to and from the site.

- 09:00am – 17:30pm (Monday – Friday) = Baling, shearing and cutting (using handheld equipment) of waste for recovery.
- Increase the tonnage to <30,000 tonnes per annum, <15,000 tonnes per year of ELVs and <15,000 tonnes per annum of scrap metal.
- Acceptance and processing of scrap metal wastes
- 17:30pm – 18:00pm (Monday – Friday) = Housekeeping and tidying of site for the next day using mobile plant to ensure all waste is securely stored in bays
- 08:00am – 13:00pm (Saturday) = No waste acceptance or treatment, the site undergoes a full housekeeping, tidy up ready for operations to commence on Monday.
- The site will not operate in any circumstances on a Sunday or Bank Holiday.

1.5.2 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.

1.6 Lighting

1.6.1 During official lighting up times or during times of low light the site has sufficient lighting within the working areas to permit effective inspection of waste and ensure that safe working practices are maintained on site.

1.7 Waste types and quantities

1.7.1 The waste types accepted at the site are those as defined in the Controlled Waste (England & Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990 consisting scrap metal and of End-of-Life motor vehicles (including hazardous wastes such as lead acid batteries and catalytic convertors which form part of, or are contained in, a waste motor vehicle and were necessary for the normal operation of the vehicle).

1.7.2 The site will also accept some components (including hazardous) removed from cars as they are occasionally found within vehicles and rejection of such components may lead to fly tipping. For example, if a customer has some oil filters to dispose of with their vehicle the filters will be accepted and deposited appropriately at the site. The site will also accept skips of damaged vehicle parts from garage and other local businesses.

- 1.7.3 A detailed breakdown of wastes from the European Waste Catalogue (EWC) - Commission Decision 2000/532 accepted at the site will be shown within the permit which will be in Appendix III of this EMS. The throughput of the site will be limited to <30,000 tonnes per annum (tpa) comprising 15,000 tonnes of ELVs and <15,000 tonnes of scrap metal.

1.8 Waste storage details

- 1.8.1 The following tables detail the proposed maximum pile sizes and duration for all permitted wastes stored on site in line with the below action plan table. The table detailing the waste storage and durations is also clearly shown on Drawing Nos. BAR/3041/03A and BAR/3041/03B.
- 1.8.2 The overall tonnage to be accepted at the site will be limited to <30,000 tonnes per annum, comprising <15,000 tonnes per year of ELVs and <15,000 tonnes per annum of scrap metal.

Table 1.3 – Waste Storage Area Details – PART 1 OF 2

Storage Area Details PART 1 OF 2											
Plan Ref	Description	Storage type	Containment / type	Height of firewall (m)	Max Width (m)	Max Length (m)	Max storage height (m)	Approx. Area (m ²)	Conversion factor used	Approx. volume (m ³)	Max storage time
AREA 1	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 42 ELVs = 350	1	42 x 13.25 = 560	<24 weeks
AREA 2	Depolluted ELV storage area (one block)	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 18 ELVs = 150	1	18 x 13.25 = 240	<24 weeks
AREA 3	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 36 ELVs = 300	1	36 x 13.25 = 480	<24 weeks
AREA 4	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 42 ELVs = 350	1	42 x 13.25 = 560	<24 weeks
AREA 5	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 42 ELVs = 350	1	42 x 13.25 = 560	<24 weeks
AREA 6	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 42 ELVs = 350	1	42 x 13.25 = 560	<24 weeks
AREA 7	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 36 ELVs = 300	1	36 x 13.25 = 480	<24 weeks
AREA 8	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 30 ELVs = 250	1	15 x 13.25 = 400	<24 weeks
AREA 9	Depolluted ELV storage area (blocks of two)	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 24 ELVs = 200	1	1 ELV = 13.25 x 24 = 320	<24 weeks
AREA 10	Lead acid batteries and catalytic convertors	Unprocessed / sorted	Acid resistant base battery container	N/A	1.1	0.91	0.61	0.67 (per container)	1	0.67 (per container)	<4 weeks
AREA 11	Undepolluted ELVs	Unprocessed with battery disconnected	Freestanding pile / none	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per elv)	8.325 x 6 ELVs = 50	1	50	<12 hours

Table 1.4 – Waste Storage Area Details – PART 2 OF 2

Storage Area Details PART 2 OF 2											
Plan Ref	Description	Storage type	Containment / type	Height of firewall (m)	Max Width (m)	Max Length (m)	Max storage height (m)	Approx. Area (m2)	Conversion factor used	Approx. volume (m3)	Max storage time
AREA 12	Drained fluids from ELVs comprising, oil, brake fluid and screen wash	Unprocessed (liquid)	Double skinned/bunded tanks	N/A	N/A	N/A	1	N/A	1	10,000 litres	<12 weeks
AREA 13	Drained fluids from ELVs petrol, diesel, oil, brake fluid and screen wash	Unprocessed (liquid)	Double skinned/bunded tanks	N/A	N/A	N/A	1	N/A	1	10,000 litres	<12 weeks
AREA 14	Containers of scrap metal	Sealed skip (40 cubic yard)	Sealed skip / concrete panel wall	4.8	6.1	2.44	2.62	15 (per container)	1	40 (per container)	<2 weeks
AREA 15	Depolluted ELVs awaiting baling	Processed / fully stripped ELV shell	Freestanding / concrete panel wall	4.8	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 6 ELVs = 50	1	50	<12 hours
AREA 16	Waste vehicle parts	Removed from ELV	Freestanding pile / interlocking block wall	2.4	4	4	1.5	16 (per bay)	0.75	20 (per bay)	<2 weeks
AREA 17	Waste vehicle parts	Removed from ELV	Freestanding pile / interlocking block wall	2.4	4	4	1.5	16 (per bay)	0.75	20 (per bay)	<2 weeks
AREA 18	Baled depolluted ELVs & waste vehicle parts	Processed	As above	2.4	13	6.5	1	82	1	82	<4 weeks
AREA 19A & 19B	Waste tyres and alloys wheels	Removed from ELV	Free standing pile / three-sided interlocking block wall	2.4	13	7	1	91	0.75	68	<1 week

1.8.3 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.

1.9 Staffing and management

1.9.1 The table below details the minimum staff requirements when the site is open for the reception and processing of waste.

Table 1.5 - Staffing numbers and responsibilities

Position	Employees	Responsibilities
Site manager	1	Overall management of the site including administration
Technically Competent Manager (weekly)	2	Ensuring that the site is being operated in accordance with the Environmental Permit and in-line with attendant regulations (attendance weekly)
Machine / Plant Operators / Operatives	11	Waste handling/processing, reception and plant operation
Administration staff	6	Administration for sales / transfer notes
Drivers	6	Transporting waste to/from the site

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

1.10 Health and safety

1.10.1 All operations on site are carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. Conditions of site use for employees, visitors and contractors are shown in Appendix II. These conditions are shown to all site users and must be signed prior to using the site. Anyone refusing to comply with the conditions of use will be asked to leave the site.

1.10.2 All staff are trained and required to complete the forms shown in Appendix II to ensure they are aware of the potential Health & Safety issues on site and they have the appropriate PPE to prevent any accidents.

1.11 Fit and proper persons

- 1.11.1 The site's Technically Competent Managers (TCMs) are Jape Daly and Charlotte Malone who have the Level 4 Medium Risk Operator Competence (MROC) for Waste Management Operations – Physical Treatment with Waste Management Industry Training and Advisory Board (WAMITAB) Certificate of Technical Competence (COTC).
- 1.11.2 The COTC holder (and any additional TCMs) will be required to enter their time spent on site in the site diary. The required managerial cover is a percentage of the site's operational hours based on the site's OPRA score calculated by the EA. Any changes to the site management will be notified to the EA within 5 working days, naming the new manager or person providing the cover.

1.12 Waste Carriers

- 1.12.1 The company holds an upper tier waste carriers' licence; ref CBDU182984.

1.13 Convictions

- 1.13.1 At the present time, neither Assington Autos Limited nor any of the relevant people within the company had been convicted of a relevant offence.

2 Site Engineering and Infrastructure

2.1 Site location

2.1.1 The site is located at The Breakers Yard, Barracks Road, Assington, Sudbury, Suffolk, CO10 5LP. The site is located on the southern side of Barracks Road to the south of Assington village. It has long been established as a vehicle breakers yard and scrap recycling centre. The current owners took over the site in 2017 and set about changing the manner in which the site operated to improve working practices, making the process more efficient and ensuring that the best environmental practices are upheld. They are recognised as being one of the leading companies in the vehicle recycling Authorised Treatment Facility field.

2.2 General

2.2.1 Operational and storage areas are clearly shown on Drawing Nos. BAR/3041/03A and BAR/3041/03B.

2.3 Access and parking

2.3.1 Access to the site is off Barracks Road and suitable parking will be available on site as shown on Drawing Nos. BAR/3041/03A.

2.4 Notice board and signs

2.4.1 A notice board is erected at the site entrance and display 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 details (07377 721452).
- Operating hours.

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

2.5 Weighbridge

2.5.1 The site will benefit from a weighbridge to accurately calculate incoming and outgoing loads.

2.5.2 Should the weighbridge be offline agreed WRAP/EA volume-weight conversion factors will be used to calculate weights of incoming/outgoing loads.

2.6 Site office

2.6.1 The location of the site office is shown on Drawing No. BAR/3041/03. The office is available for important site management documentation as shown in the table below.

Table 2.1 - Site office documents

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

2.7 Site security

- 2.7.1 Security measures are clearly shown on Drawing Nos. BAR/3041/03A and BAR/3041/03B which demonstrate the site is fully secure during operational hours and also out-of-hours ensuring there will be no risk of intrusion into the site.
- 2.7.2 There is 24/7 remotely accessible CCTV fitted with full on and off-site coverage. The CCTV on site will consist of various pan, tilt and zone (PTZ) and fixed cameras with 360°, 50m coverage strategically placed to ensure the whole site can be monitored.
- 2.7.3 The design, installation and maintenance of the CCTV cameras was installed by a company with a reputable UKAS-accredited third-party certification. The CCTV cameras have HD HIK vision motion sensors which will be switched on when the site is closed. The site will be monitored by up to 2 members of staff (Fred & Charlotte) during operational hours and out-of-hours. If there is a trigger or suspicious unusual 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.
- 2.7.4 In addition to the above CCTV, Charlotte Malone resides in the property to the north of the site so any break-ins and intrusions out-of-hours would be noticed and the emergency services called.
- 2.7.5 The site security measures (fencing/gates) will be inspected on a daily basis and any defects which impair the effectiveness of the security will be repaired to the same or better standard within 7 working days. All repairs will be noted on the site diary within 24 hours of the event.
- 2.7.6 If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented.

2.8 Wheel cleaning facilities

2.8.1 Due to the waste types handled on site and the site being surfaced with impermeable concrete it is considered that standard hose pipes are suitable for checking vehicle chassis prior to exiting the site.

2.9 Fuel storage

2.9.1 Further to drained fluids from ELVs, the site will also store red diesel and Ad-Blue and white as shown on Drawing No. BAR/3041/03A. Procedures for all oils and other hazardous fluids storage on site are as follows:

- Tanks will be 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.
- No combustible waste will be stored within 6 metres of the tank.
- The tanks will be clearly marked showing the product within and also its capacity.

2.9.2 **Other hazardous storage** - The site will not routinely accept or store gas cylinders. The site will not routinely store aerosols or other combustible liquids and there will be no chemicals present on site. In the event the site needs to store any of these materials, they will be done so in a quarantine skip and removed from the site within a suitable timescale.

2.10 Rejected / quarantined waste

2.10.1 Clearly labelled enclosed containers are provided for the deposit of rejected waste which cannot be removed from the site immediately. The location may be varied as operating conditions permit (i.e. to permit the loading of rejected wastes) but clear labelling and management control will ensure its use as specified.

2.11 Drainage

- 2.11.1 The upper section of the yard shown on Drawing No. BAR/3041/03A benefits from an impermeable concrete surface which is sealed and drains via a series of falls into an three separately sealed full retention interceptor tanks which a total storage of 130,000 litres.
- 2.11.2 The lower section of the yard shown on Drawing No. BAR/3041/03B will also benefit from an impermeable concrete surface which is sealed and will drains via a series of falls into two no. full retention interceptor tanks which will discharge underground into a French drain to the west of the site then into a clay and plastic lined sealed storage lagoon.
- 2.11.3 The above interceptor tanks are checked at least every 3 days and emptied if they reach 80% capacity.
- 2.11.4 it is proposed to drain the servicing building and the three stage buildings into three separate rainwater harvesting tanks. All other buildings on site drain directly into the adjacent surface water to the west of the site.
- 2.11.5 Hardstanding areas of the site drain naturally to ground or will evaporate.
- 2.11.6 Checks to site surfacing in terms of oil spills, cracks, catchment pits etc. will be checked daily / weekly to ensure they are functioning correctly, and comments noted on AAL/RF/4 in Appendix II

2.12 Vehicles, plant and equipment

2.12.1 Waste is handled using the minimum plant listed below. Additional plant will be hired to cover any very busy periods. Only trained operators will be permitted to drive/operate the plant listed below. Any changes to the list will be notified to the EA prior to implementation.

Table 2.2 - List of Plant/Equipment

Item	Number	Function
360° Excavator (grabs)	2	Loading/unloading/movement/sorting
Forklift (Diesel)	8	Vehicle/material movements on site
Depollution rig	1	Depolluting ELVs
Car baler/shear	1	Size reduction/shearing of metal waste and ELVs

2.13 Preventative maintenance

2.13.1 All mobile plant on site is subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts.

2.13.2 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 BAR/3041/03 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.

- 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.

2.13.3 In addition to the above, fleet lorries are brake checked every 6 weeks along with routine servicing as per compliance with the Traffic Commissioner. The proposed variation also includes construction of a HGV servicing building which will reduce the number of vehicle movements associated with the site.

3 Site Operations

3.1 Preliminary procedures

3.1.1 Guidance is given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types and operations which are acceptable at the site i.e. a copy of the EP is available in Appendix III of this EMS. Visitors to the site will sign the visitor's book upon arrival and exit stating the purpose of their visit and whom they represent. The procedures below are followed prior to the receipt of waste on site.

3.1.2 When a driver employed by the permit holder arrives at the waste producers' premises, he/she will inspect the load for conformity with relevant regulations and safety procedures:

- i) If the load is satisfactory the driver will sign the relevant paperwork (Duty of Care transfer note/delivery ticket or hazardous waste consignment note) and remove the load from the premises.
- ii) If the waste does not meet the description stated on the controlled waste transfer note (WTN) or hazardous waste consignment note (HWCN) the customer is advised to check the note and give a more detailed description of the waste.
- iii) If the more detailed description of the waste reveals that the waste is not permitted at the site then the customer is advised that the waste must be taken to another site which is appropriately permitted to accept the waste(s).
- iv) If further instructions are needed the driver may also report back to the site manager.

3.2 Checking in & inspection of loads

- 3.2.1 All persons delivering waste to the site are required to report to the site office upon arrival (including employees of the operator). Where a controlled waste transfer note accompanies a consignment of waste the note is 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 is advised to check the note and give a more detailed description of the waste. If the more detailed description of the waste reveals that the waste is not permitted at the site then the waste is rejected and the customer is advised to find an alternative site.
- 3.2.2 A visual inspection of the ELV is carried out by a suitably trained operative either within the site entrance area or within the site and the accompanying paperwork (if any) is checked. If a leak is found, the leaking fluids will be drained immediately and stored in the appropriate manner and spillages dealt with in accordance with Section 5.3. If unauthorised waste is discovered inside a vehicle after receipt, two courses of action are available:
- i) Return the vehicle to the producer and advise the EA of the deposit; or,
 - ii) Where the producer/owner of the vehicle has left the site and cannot be contacted or where the removal off-site of the waste may cause further problems then the waste will be deposited in the quarantine area. The EA will then be contacted to agree a course of action if the waste is difficult to handle or special.
- 3.2.3 Provided that the vehicle meets the acceptance criteria (as judged visually by a trained member of the operator) then the vehicle will be moved onto one of the depollution rigs in the depollution building to await processing.
- 3.2.4 If the ELV is delivered by a private party or is not required for insurance assessment then it will be taken directly to depollution building to await further action.

- 3.2.5 The site will also collect skips of damaged vehicle parts from garages and local businesses. These skips will be inspected pre and post tipping to ensure non-confirming wastes have been placed accidentally into the skip.

3.3 Hazardous waste procedure

- 3.3.1 The site will accept hazardous wastes comprising in the form of whole undepolluted ELV's which will be stored prior to depollution and dismantling as shown on Drawing No. BAR/3041/03.

- 3.3.2 Further checks to prevent and minimise the risk of non-conforming waste being accepted at the site will include:

- identifying the fuel type of the ELV so it can be appropriately depolluted
- checking for fuel leaks
- checking electric vehicles for damaged batteries and isolating vehicles with damaged batteries pending removal from the vehicle
- checking the boot and interior for contrary items like gas cylinders, LPG tanks and batteries and so on

- 3.3.3 Prior to ELV being accepted at the site, the operator will ensure that the following procedures for hazardous wastes are undertaken at the site:

- a) Classify the waste correctly.
- b) Check and complete the relevant parts of the consignment note before any waste is accepted into the site (If consignment note is missing, incorrect or incomplete; the waste will be rejected.
- c) The operator will keep a copy of the consignment note and provide a copy to the carrier.
- d) Once accepted the waste will need to be separated and stored safely.
- e) The operator will send consignee returns to the Environment Agency.
- f) The consignment note records will be kept on site for 5 years.

3.4 ATF Duties

3.4.1 All ELVs will be issued with an official Certificate of Destruction (CoD) when they reach their end of life. CoDs are for:

- passenger vehicles and light goods vehicles under 3.5 tonnes
- 3-wheeled motor vehicles

3.4.2 Once the operator has decided to depollute an ELV, they will generate a CoD via the DVLA online system where an account is set up. The operator will issue the CoD to the person who brings the ELV into the site. The operator will advise that person to keep the CoD indefinitely. The operator will not charge the last holder/owner for issuing the CoD.

3.4.3 The DVLA system automatically updates the vehicle record to reflect a CoD. If the operator depollutes an ELV not covered by the regulations, for example, a lorry, motorcycle or motorhome, the operator will still need to enter the vehicle details into the CoD system. It will automatically update the details as a notification of destruction and update the vehicle record. Also take the vehicle log book (V5C) if available. The operator will keep them for 12 months prior to destroying them. This is important as the owner/keeper uses it to prove to the DVLA that they have taken their vehicle to a registered ATF waste site and it is no longer on the road.

3.5 Weighing and Categorising Loads

3.5.1 The incoming weights of waste are weighed using the weighbridge. ELV weights will be estimated by class category or vehicle documentation. The weight of delivered vehicles may be recorded as the standard/plated net weight for that type of vehicle if whole. These weights are required for each ELV that is delivered to the site to ensure that the site complies with recycling targets and throughput limits. On average an ELV is usually 1 – 1.2 tonnes. The site will also accept vans which can weight up to 5 tonnes.

- 3.5.2 Where registration documents are available these are used to confirm vehicle details. However, vehicles arriving via insurance companies are unlikely to possess such documents.

3.6 Waste handling - ELVs

- 3.6.1 Schedule 5 of the End-of-Life Vehicles Regulations 2003 sets out the minimum technical requirements for keeping and treating ELVs. The site operates to the standards set out in these Regulations.

- 3.6.2 Upon acceptance into the site, the battery will be disconnected and removed from the ELV as soon as practicable once stored in **AREA 11** as shown on Drawing No. BAR/3041/03A. Once the depollution rig is clear, the ELV will be manoeuvred by forklift onto the rigs shown on Drawing No. BAR/3041/03A for storage prior to depollution and dismantling. The ELV is then depolluted/dismantled as per the following three stages:

STAGE ONE – REMOVAL OF HAZARDOUS COMPONENTS

- 3.6.3 Once vehicles have passed inspection, they will be stored adjacent to the first depollution building (**AREA 11**) where the battery has been disconnected / removed from the ELV. The ELV will then be depolluted which will consist of removing the wheels, battery, catalytic converter, air bag, ECU, jack and key. These parts will be stored temporarily in separate boxes within the building before being transferred to the larger associated storage areas on site (**AREA 10**). Tools used for this process are as follows:

- An impact nut gun is used to remove the wheels this is a very quick and efficient process. This causes minimal noise.
- A Husqvarna K1 PACE Battery Powered Disc Cutter is used to remove the catalytic converter. The cutter would only be used on vehicles which have rusted, if the vehicles are not rusted, hand tools can remove the catalytic convertor
- Batteries, ECUs, airbags are removed using rachets/spanners this does not produce any noise.
- Key and jack are removed by hand which also does not produce any noise.

- 3.6.4 Once this process is complete, the ELV will be transferred to the adjacent building to the south and undergo the stage two process comprising depollution as shown below:

STAGE TWO – DEPOLLUTION AND REMOVAL OF HAZARDOUS FUELS & LIQUIDS

- 3.6.5 Vehicles are depolluted using a green car depollution rig which is powered by electric and compressed air. The compressed air is run by a generator on 3 phase electrics. The liquid components then drain via a series of pipes to the sealed bunded tanks which are outside of the building (**AREAS 12 & 13**). When the liquids in the bunded tanks are reaching full capacity, the liquid is removed in a safe manner using a specialist tanker vehicle. The vehicles are transported out of the shed using a forklift to the stage three process as shown overleaf.
- 3.6.6 Any oily rags, cloths etc. produced during the depollution procedure are stored within refuse bin which will be monitored daily and emptied when full. The operative depolluting the ELV will alert the site manager or TCM when the container requires emptying to a suitably permitted site. Any overalls/gloves used will be stored in the welfare area and will not be left in the depolluting area out-of-hours.
- 3.6.7 The depollution area is elevated forks where the ELV is placed onto to allow operatives to safely remove the hazardous components and fluids to render the car as non-hazardous waste.

STAGE THREE – VEHICLE STRIPPING

- 3.6.8 The vehicle is now ready to be stripped of the engine, gearbox and axles. These are removed/cut using the Husqvarna K1 PACE Battery Powered Disc Cutters. This cutter has been replaced with the former angle grinder which considerably reduces the noise associated with it. The cutter would only be used on vehicles which have rusted, if the vehicles are not rusted, hand tools can remove these items. The engine, gearbox and axle are now ready to be passed to stage four and the shell is ready to be passed to stage five. This is passed to stage five using a forklift as it is lifted and not being scrapped along the floor, this reduces noise levels.

- 3.6.9 Stages one – three will take place inside buildings which have open fronted facing east ensuring the areas are well ventilated to ensure petrol and fuel vapours do not build up

STAGE FOUR – VEHICLE STRIPPING / ENGINE REMOVAL

- 3.6.10 Once in stage four (**AREA 15**), the engine, gearbox and axle are removed, these are then cleaned, removing any wiring loom, loose metals. The wiring loom is removed using the K1 PACE Battery Powered Disc Cutter. Export engines will then be placed to the south of the site using a forklift to transport to the allocated area. Any engines or parts unsuitable will be stored in **AREAS 14, 16 & 17**.

STAGE FIVE – VEHICLE STRIPPING / REMOVAL OF WIRING LOOM AND VARIOUS GRADES OF MATERIALS FROM THE VEHICLE SHELL

- 3.6.11 The above items are removed using a 23.5tonne Hyundai rubber track machine with powerhand attachment. Vehicles are placed in front of the machine on a 30mm plate to avoid damage to the concrete area. The clamp system on the machine holds the shell in place and the pincher starts to remove all non-ferrous metals, these metals are then placed in adjacent bays (**AREA 16**). Once all the non-ferrous metals are removed, the shell is then placed in **AREA 15** to await baling.

STAGE SIX – USE OF ATLAS GRAB/EXCAVATOR AND SHEARING/BALING OF ELVS

- 3.6.12 The ELV is transferred by the grab into shear. The shear can process one ELV shell every 2 minutes. Once the ELV is baled, it is lifted and placed safely into **AREA 18** and stored ready to be collected by the third-party hauliers.

STAGE SEVEN – PROPOSED ACCEPTANCE OF VEHICLE PARTS IN SKIPS

- 3.6.13 The site will propose to accept skips of damaged vehicle parts from garages/business which will be accepted and tipped into the one the adjacent bays (**AREA 16**) near the baler/shear. These are likely to be placed near the shell and baled at the same time as per stage six.

- 3.6.14 The operator will also store depolluted ELVs on the racking (**AREAS 1 – 9**), these are vehicles which are in good condition and will be advertised online where customers can purchase parts from the ELV. This ELV is usually stored here for approximately 3-6 months then it will be subject to baling or sold to another recycler.

3.7 Other Wastes i.e., Metal and Vehicle Parts Procedure

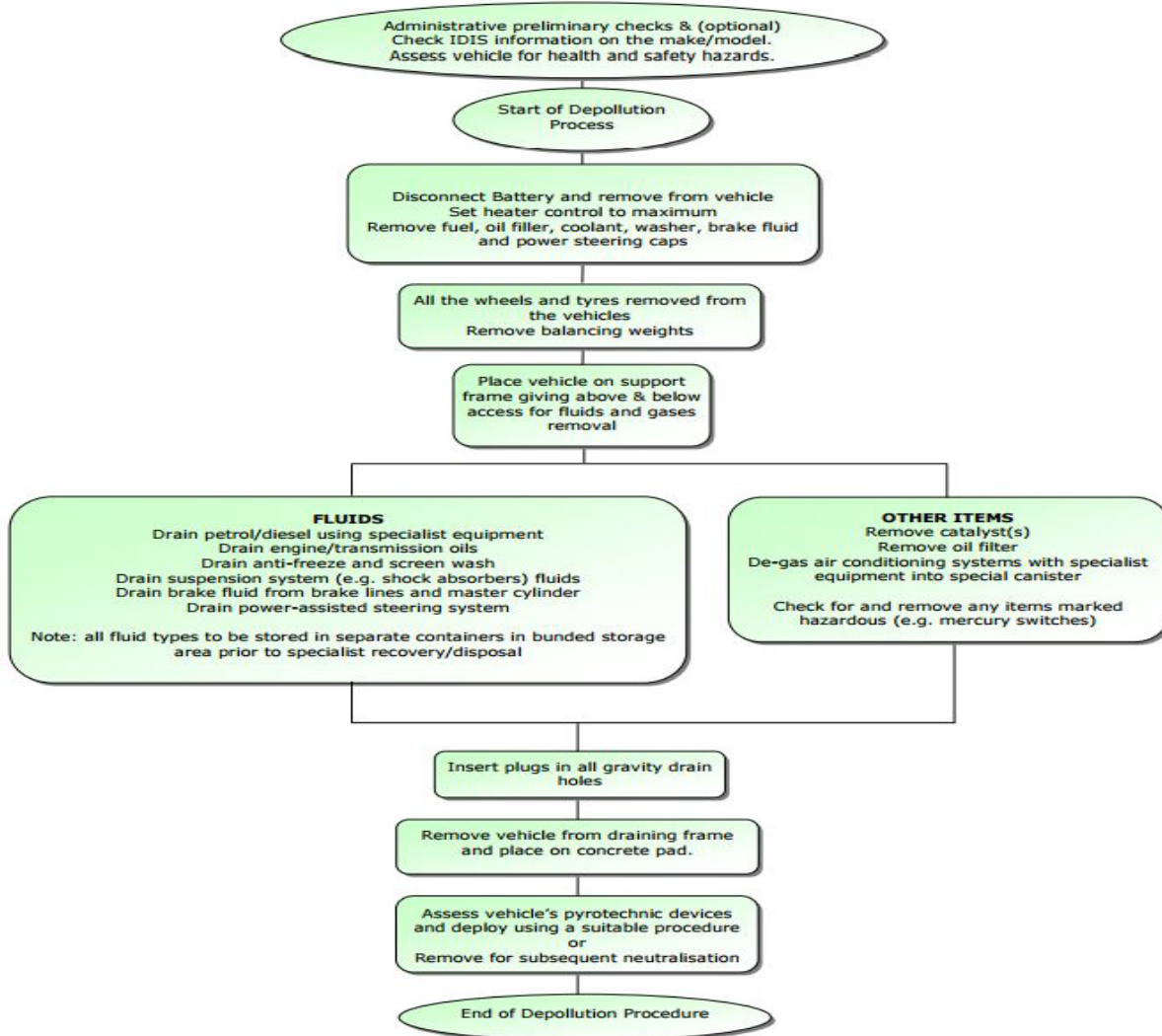
- 3.7.1 Prior to the above being accepted into the site, the driver/customer will be asked to declare the type of waste on the vehicle or inside the skip to ensure the waste can be taken to the correct area on site. The waste will then be bulked up and larger items will be stored prior to processing.

3.8 Waste handling - Rejected wastes

- 3.8.1 Any rejected waste will be stored in a secure skip which will be available on site. This will occur when non-conforming waste is discovered after the deposit of a load i.e. a bin bag or other material found inside the ELV.

3.9 ELV depollution process

3.9.1 Each ELV is treated as set out in the DEFRA / DTI publication “Depolluting End-of-Life Vehicles: Guidance for Authorised Treatment Facilities” as shown overleaf:



3.9.2 Suitable absorbents and full spill kits are kept by the depollution rig and undepolluted ELV storage area in the event of any spillages of oil or fuel. Any contaminated absorbent is then be removed to an appropriately permitted facility.

3.9.3 The depollution area is a lift or elevated forks on which the vehicle is placed onto to allow operatives to safely remove the hazardous components and fluids to render the car as non-hazardous waste.

3.9.4 The depolluting equipment installed at the site is from Green Car Depollution who are industry specialists. This equipment is designed specifically for the depollution of ELVs and includes tanks to 'suck out' the fluids.

3.10 Fuel and hazardous fuel storage

3.10.1 All hazardous components / liquids removed from the vehicles are stored in dedicated sealed, bunded tanks, covered and on concrete with sealed drainage. The liquids will be in separate, clearly labelled, leakproof containers (**AREAS 12 & 13**).

3.10.2 Wastes of the same type, for example different grades of oil, may be stored in the same container and will not be mixed with other fluids.

3.10.3 Quantities of fluids in the drums/tanks which are drained during the depollution process are monitored daily to ensure there is adequate capacity. Fluids are collected on a contract basis by reputable contractor who is a registered carrier of hazardous waste.

3.11 Removal of batteries

3.11.1 **Batteries** - Batteries removed from vehicles will be stored and handled as follows:

- i) Stored upright in clearly labelled, acid-resistant, leakproof containers (**AREA 10**).
- ii) Different types of batteries will not be mixed together, for example lead acid batteries with lithium-ion batteries. Containers can usually hold up to 1 tonne of batteries and are stored in the depollution building. Daily checks are made on the containers to ensure they are fit for purpose.
- iii) A suitable absorbent agent is kept within near the storage area so that prompt action can be taken to absorb any spillages. Any contaminated adsorbent material will then be removed to an approved disposal facility.
- iv) Removal of batteries is carried out in accordance with the Hazardous Waste Regulations 2005 (as amended) or any subsequent amending legislation.

3.12 Difficult Wastes - catalytic convertors

3.12.1 Catalytic Convertors removed or accepted from ELVs are handled by hand only and stored in sealed containers internally in the non-ferrous building (**AREA 10**) as shown on Drawing No. BAR/3041/03A. Catalytic converters will be stored in a manner that prevents the metal casing being damaged or pierced. If the metal casing becomes damaged the catalytic converter will be either double bagged or wrapped in a minimum of 400-gauge polyethylene. Catalytic convertors are bulked up and sent to a suitably permitted facility. No treatment of catalytic convertors will take place at the site.

3.13 Exporting waste

3.13.1 If the operator exports an ELV for dismantling they will make sure the correct waste shipment paperwork goes with it. The paperwork needs to authorise the movement of the ELV from the site of origin to the destination site.

3.13.2 If the operator sells ELVs for export, they will comply with the waste duty of care. The site will make sure the ELVs are passed to an authorised person with:

- a waste carrier registration
- the correct waste shipment notification paperwork for the export of the ELV(s) to the country of destination

3.13.3 The operator will not ship undepolluted ELVs to some non-EU countries. They are hazardous waste. You can use the waste export tool to check where undepolluted vehicles can be shipped.

3.14 Record keeping

3.14.1 Assington Autos Limited use detailed waste transfer and product notes in paper and electronic form to ensure compliance with the Waste Duty of Care Code of Practice - 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 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).

3.14.2 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.

- 3.14.3 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.
- 3.14.4 **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 and sent to a suitably permitted site. The records of which will be kept for 5 years. If the site receives an ELV from a householder or business, no HWCN will be required. Completion of a HWCN will only take place if the operator purchases a Category B ELV or accepts an ELV from a third-party site.
- 3.14.5 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). The requirement of the permit is to report waste returns on an annual basis, these will be submitted on or before 31st January each year.
- 3.14.6 Outcomes of inspections of waste types, hardstanding areas, transfer/treatment areas, storage areas, drainage channels, etc. are recorded using the site inspection form AAL/RF/4 or similar document and detailed comments are entered into the site's diary (including action taken or proposed).
- 3.14.7 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.

3.15 Management techniques

- 3.15.1 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.
- 3.15.2 The manner in which the facility is managed is a critical element in ensuring emissions from the site operations are minimised. Therefore, management of this facility will ensure:
- a) staff are competent to manage and operate the facility i.e. fit and proper persons;
 - b) waste acceptance procedures are in place;
 - c) appropriate storage and handling procedures are in place;
 - d) waste/product despatch procedures are in place;
 - e) procedures and control techniques in place to minimise potential emissions to air, land and water;
 - f) there is an EMS, i.e. this document, in place to ensure standards are maintained, including incidents and complaints management procedures;
 - g) a communication programme is in place; and,
 - h) a health and safety programme is in place and is coherently conveyed to all staff and rigorously enforced throughout the whole of the organisation.

3.16 Site closure plan

- 3.16.1 In the event that the site ceases to operate as a waste transfer/treatment facility as set out in the site's EP, the following steps will be followed to achieve site closure:
- a) Contact the EA to advise the Environment Officer(s) that the site is planned to cease / has ceased the acceptance of wastes under the permit.
 - b) The amount of 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, an alternative machine will be brought on site until it is repaired. If an alternative machine cannot be used, then waste will be stored securely until the plant is repaired. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages.
- 4.1.2 All site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a skip for disposal to a suitably permitted site.
- 4.1.3 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 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 5.4.
- 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 are suspended.

4.2 Site inspections and maintenance

- 4.2.1 The inspection frequencies for maintenance/housekeeping are listed on a daily inspection form. The inspection form will be completed by a person who is familiar with the requirements of the EMS and EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in the site diary. All repairs will be carried out within 5 working days unless agreed otherwise with the EA.
- 4.2.2 All repairs to site security including gates and fencing will be made within 5 working days of the discovery of the damage and the site will be made secure until the repair has been completed.

4.2.3 Any major defects found during the daily site inspection will be repaired at the time they are found, where possible. If a repair is not possible the EA will be contacted to agree a suitable timescale for repair.

4.2.4 All defects and problems likely to give rise to pollution will be recorded on the daily inspection form with repairs/solutions being carried out immediately.

4.3 Site inspection form

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

- 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.

4.4 Security monitoring

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

4.5 Control of mud and debris

4.5.1 Although unlikely to present a problem, due to the nature of the waste accepted at the site and the site being surfaced with concrete, staff will report any problems with mud or debris at the site immediately to the site manager.

4.5.2 The deposit of material on the access road or public highway will be treated as an emergency and will be cleared immediately by the operator using either a brush and shovel or vacuum tanker/road sweeper if necessary.

4.6 Control of dust

- 4.6.1 The containment of waste within the site and the nature of the wastes accepted at the site (ELVs) present a very low risk of dust. If dust were to become a problem at the site, a permanent water supply is available on site in all climatic conditions to ensure that the dust suppression can function effectively.

4.7 Odour control

- 4.7.1 The containment of waste within the site and the nature of the wastes accepted at the site (ELVs) present a very low risk of odour nuisance. If malodorous waste is deposited on site it will be consigned to a skip for rejected waste or removed from the site immediately.

4.8 Litter control

- 4.8.1 Although unlikely to present a problem, due to the nature of the waste accepted at the site, daily inspections of the site boundary will be carried out for the presence of windblown litter and operatives will be instructed to collect the litter and place it in a skip for disposal/recovery before the end of the working day.

4.9 Control of pests, birds and other scavengers

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

4.10 Control and monitoring of noise & vibration

- 4.10.1 The waste operations will be carried out always using the Best Practicable Means in terms of minimising the risk of noise and vibration from the site. Reference should be made to the site's specific noise and vibration management plan Doc. Ref. BAR-3041-G.

4.11 Complaint's procedure

- 4.11.1 Any third-party complaints received will be recorded on form AAL/RF/7 and will include a record of the complaint, particulars of the complainant and details of any action taken to alleviate the problem to ensure the likelihood of a future third party complaint is minimised.

5 Emergency Procedures & Contingencies

5.1 General

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

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

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

5.2 Fire

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

5.2.2 The site has a fire prevention plan (FPP) in place (Doc. Ref. BAR-3041-B) which has been prepared to in accordance with EA guidance to meet the following objectives:

- To minimise the likelihood of a fire happening;
- To aim for a fire to be extinguished within 4 hours;
- To minimise the spread of a fire within the site and to surrounding neighbouring sites;
and,
- To minimise impact of fire on people, environment and businesses.

5.2.3 For quick reference, the following actions will be taken when fire is detected or suspected (site operatives):

- a) DON'T PANIC
- b) RAISE THE ALARM (IF NOT DONE SO ALREADY)
- c) NOTIFY THE SITE MANAGER (IF SAFE TO DO SO)
- d) **DO NOT TRY TO TACKLE THE FIRE YOURSELF UNLESS YOU ARE TRAINED IN DOING SO AND YOU ARE SURE OF THE NATURE OF THE FIRE**
- e) LEAVE THE BUILDING USING THE NEAREST EXIT (I.E. FIRE DOOR OR ROLLER SHUTTER DOOR) AS QUICKLY AND AS ORDERLY AS POSSIBLE
- f) ASSEMBLE AT THE SPECIFIED FIRE ASSEMBLY POINT WHICH IS LOCATED BY THE SITE ACCESS GATES.
- g) THE SITE MANAGER OR DELEGATED OPERATIVE WILL BE IN CHARGE OF CALLING THE EMERGENCY SERVICES ON "999" AND ENSURING THAT ALL PERSONS WHO WERE WORKING IN THE BUILDING ARE ASSEMBLED SAFELY
- h) INFORM ALL NEIGHBOURING PREMISES WHO ARE LIKELY TO BE AFFECTED
- i) INFORM THE ENVIRONMENT AGENCY
- j) DO NOT RETURN TO THE SITE UNTIL YOU HAVE BEEN GIVEN THE 'ALL CLEAR' BY THE EMERGENCY SERVICES AND THE SITE MANAGER

5.3 Breakdowns

5.3.1 In the event of plant breakdowns, alternative plant will be sourced until the existing plant is repaired to prevent potential over stockpiling of waste. If an alternative plant cannot be

used then waste will be stored securely until the plant is repaired and if necessary, waste will be diverted to an alternative site. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages.

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

5.4 Spillages

- 5.4.1 Fuel which may be stored on site will be contained within a bunded receptacle/container to contain any primary leaks. If any oil and vehicle maintenance chemicals are kept on site, they will be stored securely. In the event of a spillage 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 facility.

- 5.4.2 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.

- 5.4.3 All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Debris will be swept as required and placed in a skip for further processing on site and sent to a suitably permitted site.

- 5.4.4 All wastes liable to give rise to contamination will be removed from the site within an EA agreed timescale.

5.5 Drums

- 5.5.1 The deposit of drummed waste will not be allowed at the site. If a drum is concealed within a skip and is not observed until the skip is deposited in the waste transfer area then the following procedure will apply:

- i) The staff member will visually check the condition of the drum from a safe distance, noting any labels referring to the possible contents or hazards.

- ii) The site manager and TCM will be contacted to verify the observations and to decide on further action.
- iii) The producer of the waste and the EA will be contacted for advice and further information if necessary and both will be informed that a breach of the Duty of Care and site permit conditions has occurred as the result of the unauthorised deposit.
- iv) No further waste will be deposited until the emergency has been dealt with.
- v) All spillages will be cleared using a spill containment kit and all contaminated absorbents placed in a skip for disposal to a suitably permitted waste management site.
- vi) If the deposit results in serious reactions with other waste or harmful emissions or the drum contents cannot be identified, then the emergency services and/or specialist waste contractors will be brought in to assist. If necessary, staff will be evacuated from the site or to a safe area within the site.

5.6 Adverse reactions

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

5.7 Staff shortages

- 5.7.1 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.

5.8 Closure of destination sites

- 5.8.1 In the event of destination site closures or seasonal demands for wastes leading to a longer storage duration, the operator can divert incoming waste and send stored waste to one of

alternative sites or use the EA's public register for alternative sites who could take this material and then contact the destination site. The operator has more than one contract set up for outlets of material to plan for this event.

5.9 Operational failure

5.9.1 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.

5.10 Bomb scare

5.10.1 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. The EA will be kept informed of the events on site.

6 Weather conditions & adapting to climate change

6.1 Weather conditions

6.1.1 The site is set up to receive weather alerts from the Met Office for the following weather conditions which could hinder site operations, cause a potential complaint off site or potential breach of permit:

- i) Prolonged periods of heavy rainfall causing mud and surface water ponding; this could also lead to waste becoming wet and causing odour
- ii) Periods of cold weather leading to an inability to operate machinery on site leading to over stockpiling of wastes and obviously accidents.
- iii) High winds (above 7 on the Beaufort Wind Scale) creating a risk of litter and dust escaping beyond the site boundary
- iv) Droughts or periods of hot weather which could lead to heating of combustible waste, water shortages, hosepipe bans and excessive dust.
- v) Dense fog leading to poor visibility causing accidents.

6.1.2 The site will install the following preventative measures to ensure the above do not hinder operations:

HEAVY RAINFALL

- Vehicles exiting the site will undergo a more thorough check to ensure mud is not tracked off site.
- Should long periods of rainfall be likely, the site may consider hiring (as a result of daily inspections) a third-party road sweeper to cover the wet period to ensure surfaces are swept thoroughly throughout the day.
- Inspect and empty storage tanks more frequently i.e. daily instead of weekly
- Increase site inspections to three times daily to ensure any potentially contaminated surface water is being contained within sealed drainage areas

HIGH WINDS

- There will be no sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds.
- Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.
- Stockpiles will be reduced to a suitable height to prevent the material escaping beyond the site boundary.
- In the event of high winds, the site will deploy the above measures and may be forced to close operations until conditions have improved.

DROUGHTS/WARM, DRY WEATHER

- In extreme cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks which can be used for filling the mobile bowser to ensure suppression techniques can still function.
- Increase site inspections for combustible waste three times daily for any early fire signs i.e. smells, smoke, flames.
- Reduce stockpile durations for combustible thus reducing their inability to become hot
- These measures are shown within the operator's FPP.

DENSE FOG (POOR VISIBILITY)

- The site will not operate in conditions of poor visibility such as dense fog to reduce the risk of vehicle collisions or other potential accidents.

6.2 Climate change

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

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

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

- Increases in the probability and severity of flooding (fluvial, groundwater, surface);
- Exposure to high temperatures and heatwaves; and
- Shortages in availability of water.

6.3 Flood risk

6.3.1 The site is within Flood Zone 3 and given the location, there is a risk of flooding from rivers with a 1% (1 in 100) chance or greater of happening in any given year, including an allowance for climate change.

6.3.2 The existing site surface water drainage system includes an underground catchment pits and retention interceptors that act as temporary underground storage tanks prior to being emptied allowing for slow run-off. The drains and tanks will be regularly checked (weekly or daily in periods of heavy rain) and emptied by a third-party contractor when 80% full.

6.3.3 The external yard is fully sealed by the existing retaining walls and kerbing which would prevent run-off. Lighter materials are stored in sealed skips or within a building.

- 6.3.4 The operator has demonstrated to the Local Planning Authority (LPA) that there are mitigations in place in the event of flooding by submitting and having approved a Flood Risk Assessment and Drainage Strategy. These documents are kept in the site office.

6.4 High temperatures and heatwaves

- 6.4.1 Staff operating outside or within the building would be potentially vulnerable to high temperatures and heatwaves. The building in which sorting would be undertaken has vehicle access and egress points. Fans can be installed to provide a flow-
- 6.4.2 The retention and enhancement of vegetation surrounding the site will also provide a degree of shelter from wind and help to reduce the risk of dust being blown off-site, while also providing for shade and carbon sequestration.
- 6.4.3 The site operates in accordance with an FPP which has various mitigation measures to reduce the risk of a fire occurring at the site by meeting the FPPs three objectives.

6.5 Summer daily maximum temperatures

- 6.5.1 The summer daily maximum temperatures may be around 7°C higher compared to average summer temperatures now, with the potential to reach extreme temperatures as high as over 40°C with increasing frequency based on today's values. Impacts of these temperature changes are outlined below:
- a) IMPACT 1: Potential for increased waste reaction or fires involving heat sensitive or combustible waste. The site uses the following mitigation measures:
 - The site operates in accordance with an approved FPP.
 - b) Impact 2: Potential for fire if the temperature exceeds the heat rating of components in electrical equipment or components are subjected to intense and direct sunlight. The site uses the following mitigation measures:

- The site will regularly review the heat rating of components that have high workloads or are likely to be exposed to direct sunlight and heat.
 - The site will shade electrical equipment if it is subject to direct sunlight for prolonged periods of time.
- c) Impact 3: Potential increase in high temperature expansion and stress of plant, pipework and fittings. UV degradation of plastic pipes and hoses causing them to fail. The site uses the following mitigation measures:
- The site will regularly inspection and preventative maintenance of site, plant and equipment.
 - Preventing prolonged UV exposure of plastic pipes and hoses by re-routing them in conduits or within buildings.
 - Replacing exposed pipes and hoses with metal or other types of material less susceptible to photo-degradation.
- d) Impact 4: Potential increased dust emissions from processing areas, stockpiled material and site roads. Reduced availability of water for dust suppression. The site uses the following mitigation measures:
- The site operates in accordance with an approved DMP
- e) Impact 5: Long periods of hot and dry weather could lead to a drought and may have an impact on water supplies for: Emergency water usage, cooling systems, firefighting, processes that require water as input. The site uses the following mitigation measures:
- Reference should be made to section 6.1.2 in terms of droughts, it is considered the site has suitable measures in place.

6.6 Winter daily temperatures

- 6.6.1 This could be 4°C higher than the current average with the potential for more extreme temperatures, both warmer and colder than present.

- a) Impact 1: Potential increased site surface water and flooding. The site uses the following mitigation measures:
- Reference should be made section 2.9 in terms of daily inspections for drainage. Reference should also be made to Section 6.1.2 in terms of mitigating for heavy rainfall events.
- b) Impact 2: Lower winter temperatures could result in an increased risk of pipes (or similar) freezing.
- The site will mitigate this through regular inspection (minimum daily) and preventative maintenance of the site, plant and equipment.

6.7 Availability of water

- 6.7.1 The main water use on site would be dowsing and dampening stockpiles and surfaces, during dry and windy conditions. Mains water and mobile dowsers are used for this purpose, but in the event of a water shortage scenario, the site will have purchased rainwater harvesting tanks so rainwater captured in the tank will be used for dust mitigation, reducing reliance on mains water.

6.8 Other climate change factors

- 6.8.1 Climate projections show that over the coming decades we will face an increased risk of climate change impacts, including:
- a) Extreme rainfall, leading to more frequent and severe flooding events
- Reference should be made to sections 6.1.2 and 6.6.
- b) Heatwaves
- Reference should be made to sections 6.1.2, 6.4 and 6.5.

c) Drought

- Reference should be made to sections 6.1.2, 6.4 and 6.5.

d) Rise in sea levels and tidal surges

- Due to the location of the site, it is considered this impact would not affect the site.

e) Storms

- Reference should be made to sections 6.1.2 and 6.6.

6.9 Conclusion

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

7 Training for Site Staff

7.1 Training needs assessment

7.1.1 All new and existing site staff are subject to a specific training regime based on their responsibilities at the site to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.

7.1.2 An employee training record will be available at the site detailing information similar to AAL/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.

7.2 Site rules and infrastructure training

7.2.1 This information is provided to all employees, visitors and contractors with a full understanding of the site's conditions of use, which is communicated and documented at induction for all staff with specific induction for visitors and contractors.

7.2.2 Competency should be demonstrated within this field to ensure the employee is fully aware of the site's surroundings and operations to ensure their safety and compliance with specific operating conditions at the site.

7.3 Emergency procedures training

7.3.1 All employees are required to be familiar with the Environmental Controls in Section 4.0 and the Emergency Procedures as detailed in the Section 5.0.

7.3.2 In addition to normal operating conditions as specified in the site rules, employees must also be trained in dealing with eventualities which may occur outside the scope of normal

operating conditions, so they are aware of how to deal with these situations in advance of an occurrence.

7.4 Fire safety / firefighting training

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

7.4.2 Emergency procedures detailing what measures employees should adopt should a fire occur at the site are detailed in Section 5.2 and are covered by the 'emergency procedures' training (see Section 6.3).

7.4.3 Regular fire drills are undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs. These will be unannounced drills and will not form part of the induction or review training as specified in Section 6.1.

7.5 Recognition of waste types training

7.5.1 All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the 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 EA to agree a suitable method for removal.

7.5.2 Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production in accordance with Section 3.0. They will

be trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

7.6 Storage areas / limits training

7.6.1 Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure that waste storage operations comply with the requirements of the EP for the site.

7.6.2 Employees in these roles must also be trained to recognise storage limits to ensure that they are in accordance with those specified in Section 1.6.

7.7 Vehicle / plant preventative maintenance training

7.7.1 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human health.

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

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

7.8 Duty of care training

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

7.9 Plant operation training

7.9.1 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.

7.9.2 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.

7.10 Permit / management System

7.10.1 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.

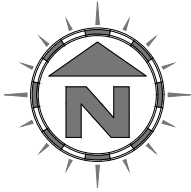
7.11 Training for contractors

7.11.1 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.

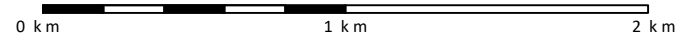
7.11.2 Additional training will be provided to contractors in their area of expertise. If they are dealing with specific items of plant/machinery, site operating conditions and a general understanding of the EP conditions will be provided to prevent any adverse impacts on the environment.

Appendix I

Drawings



Scale Bar (1:25,000)



NOTES

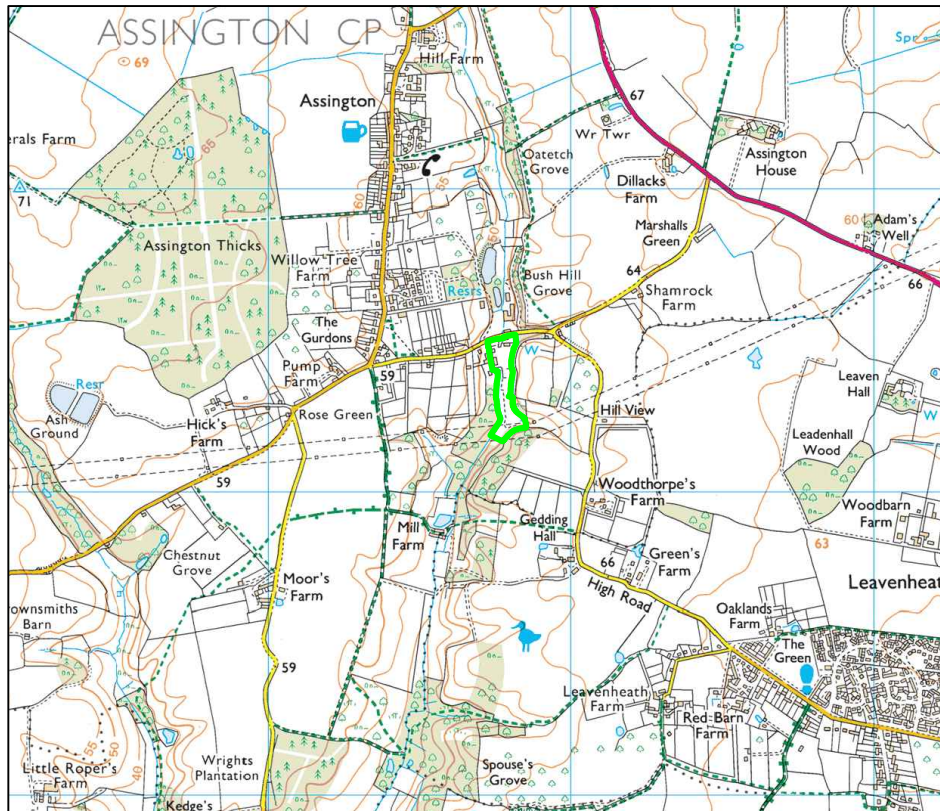
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REVISION HISTORY

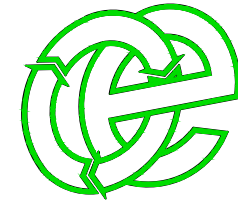
Rev:	Date:	Init:	Description:
-	08.04.22	CP	Initial drawing

KEY:

Site location



Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
SITE LOCATION MAP

CLIENT
Assington Autos Ltd

PROJECT/SITE
The Breakers Yard, Barracks Road,
Assington CO10 5LP

SCALE @ A4 1:25,000	CLIENT NO 3041	JOB NO 001
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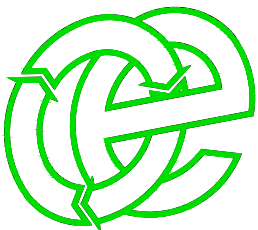
DRAWING NUMBER BAR/3041/01	REV -	STATUS Issued
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DRAWN BY CP	CHECKED --	DATE 08.04.22
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Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk



Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
PERMIT BOUNDARY PLAN

CLIENT
Assington Autos Ltd

PROJECT/SITE
The Breakers Yard, Barracks Road, Assington
CO10 5LP

SCALE @ A3	CLIENT NO	JOB NO
1:1,250	3041	001

DRAWING NUMBER	REV	STATUS
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DRAWN BY	CHECKED	DATE
CP	--	05.07.23

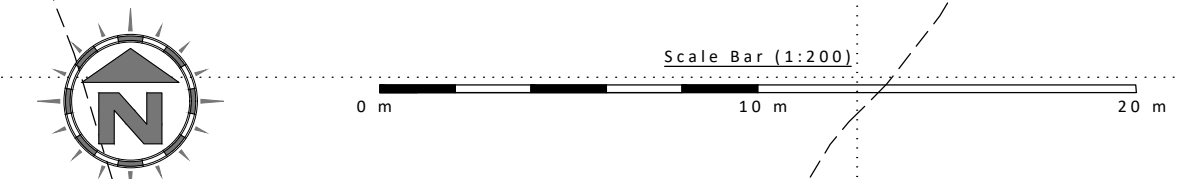
KEY:
— Permit boundary

NOTES
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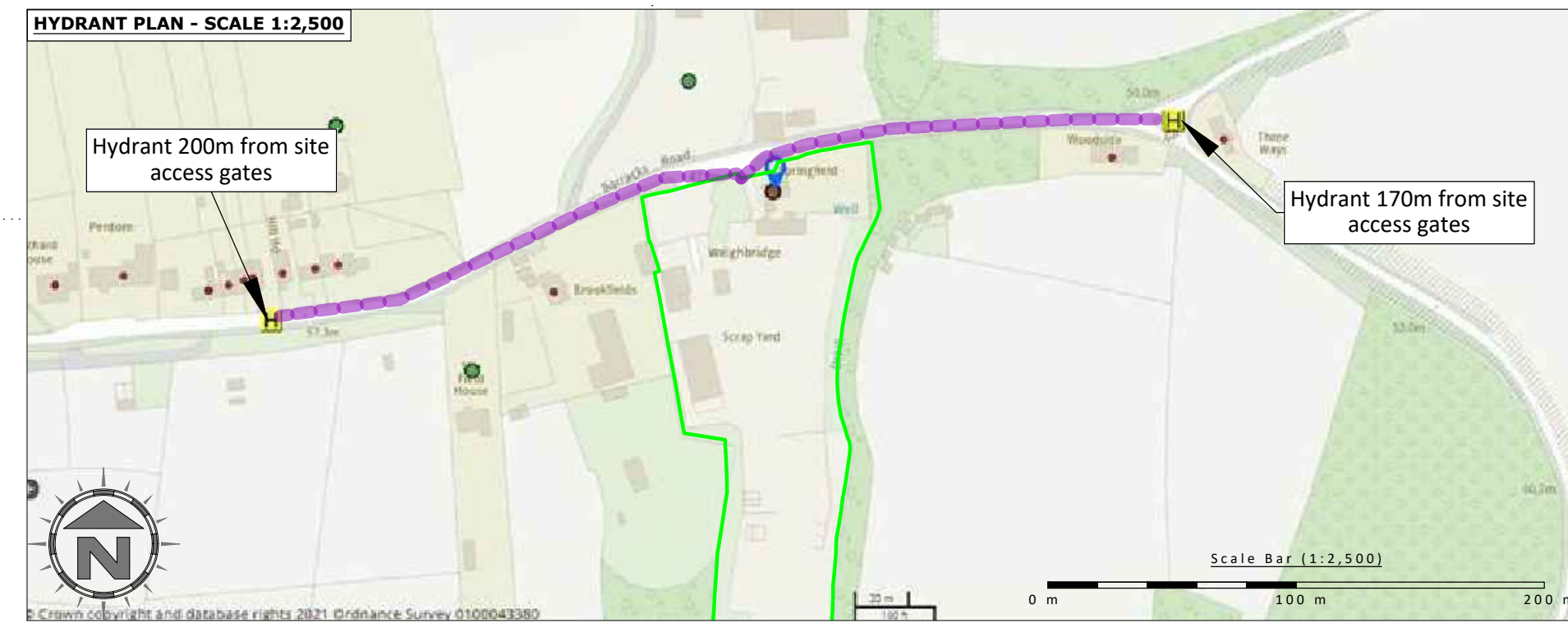
REVISION HISTORY

Rev:	Date:	Init:	Description:
-	05.04.22	CP	Initial drawing
A	05.07.23	CP	Corrected drawing reference

Plan Ref	Description	Storage type	Containment / type	Height of firewall (m)	Max Width (m)	Max Length (m)	Max storage height (m)	Approx. Area (m ²)	Conversion factor used	Approx. volume (m ³)	Max storage time
AREA 1	Depolluted ELV storage area (blocks of two)	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 42 ELVs = 350	1	42 x 13.25 = 560	<24 weeks
AREA 2	Depolluted ELV storage area (one block)	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 18 ELVs = 150	1	18 x 13.25 = 240	<24 weeks
AREA 3	Depolluted ELV storage area (blocks of two)	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 36 ELVs = 300	1	36 x 13.25 = 480	<24 weeks
AREA 4	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 42 ELVs = 350	1	42 x 13.25 = 560	<24 weeks
AREA 5	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 42 ELVs = 350	1	42 x 13.25 = 560	<24 weeks
AREA 6	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 42 ELVs = 350	1	42 x 13.25 = 560	<24 weeks
AREA 7	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 36 ELVs = 300	1	36 x 13.25 = 480	<24 weeks
AREA 8	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 30 ELVs = 250	1	15 x 13.25 = 400	<24 weeks
AREA 9	As above	Stored 3 ELVs high on racking	N/A due to racking	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 24 ELVs = 200	1	1 ELV = 13.25 x 24 = 320	<24 weeks
AREA 10	Lead acid batteries and catalytic converters	Unprocessed / sorted	Acid resistant base battery container	N/A	1.1	0.91	0.61	0.67 (per container)	1	0.67 (per container)	<4 weeks
AREA 11	Unpolluted ELVs	Unprocessed with battery disconnected	Freestanding pile / none	N/A	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8,325 x 6 ELVs = 50	1	50	<12 hours



- KEY**
- Permit boundary
 - Waste storage areas
 - Non-waste storage areas
 - Hazardous waste storage areas
 - Non-waste fuels, oils and other liquids storage
 - Temporary waste storage areas (clear prior to shutdown)
 - Waste recycling / storage buildings (impermeable concrete floor)
 - Other buildings i.e. workshops/offices
 - Impermeable concrete surfaces with sealed drainage
 - Contaminated surface water drainage
 - Clean surface water drainage
 - Surface water drainage fall direction
 - Gully's
 - Manholes
 - Quarantine area (with 6m buffer zone) based on AREA 10
 - Hose reels (indicative location)
 - Fire fighting equipment / extinguishers (indicative locations)
 - Plant/shaft (indicative locations)
 - Manual fire alarms (break glass / horns) - indicative location
 - Spill kits (indicative locations)
 - Designated smoking area
 - Access route for emergency services
 - Fire hydrants
 - Fire assembly points
 - Out-of-hours plant storage
 - Pan, tilt and zone cameras with 360° 50m coverage



Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
SITE LAYOUT & FIRE PLAN (PART 1 OF 2)

CLIENT
Oaktree Environmental Ltd

PROJECT/SITE
The Breakers Yard, Barracks Road, Assington CO10 5LP

SCALE @ A0 1:200 **CLIENT NO** 3041 **JOB NO** 001

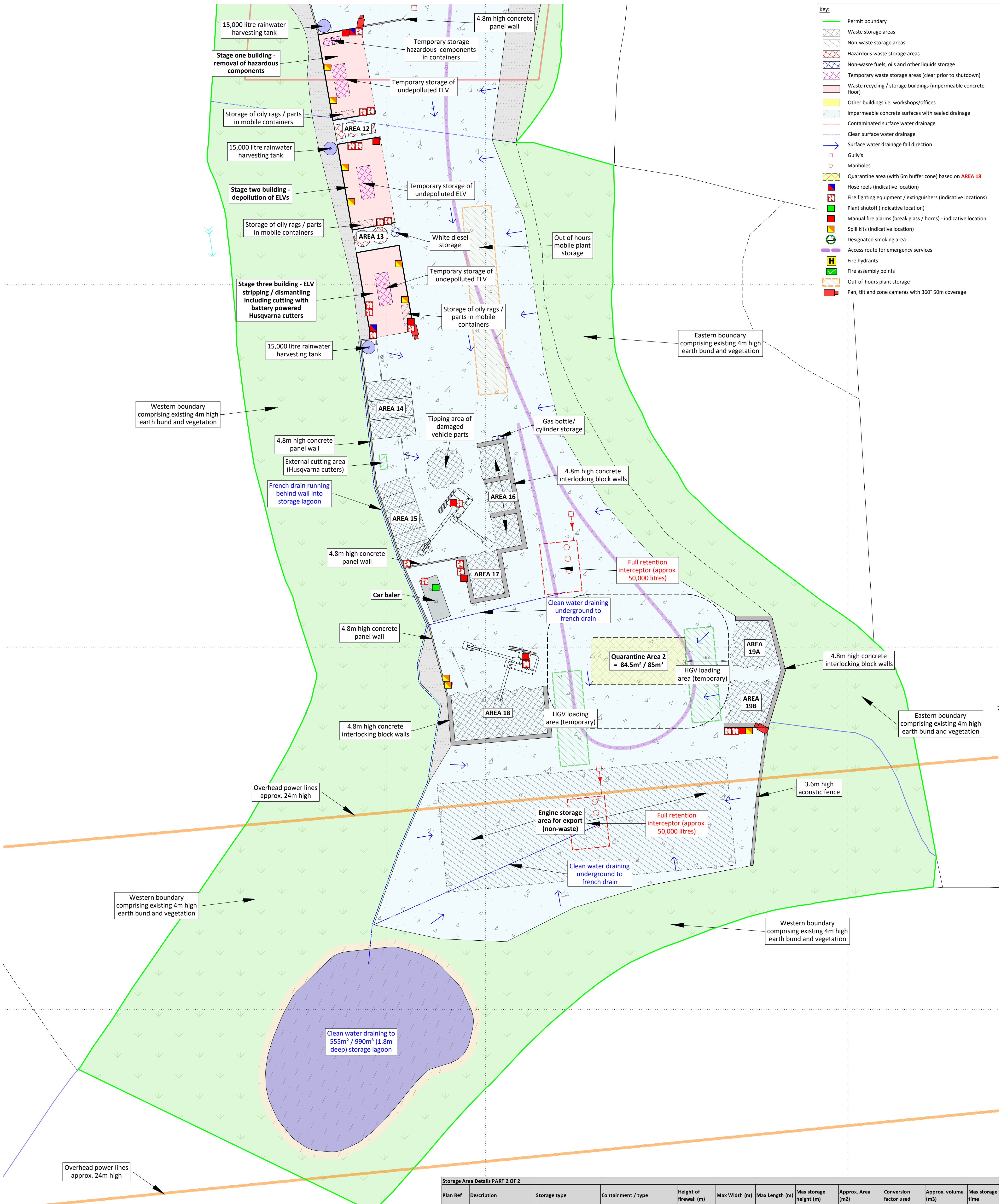
DRAWING NUMBER BAR/3041/03A **REV** A **STATUS** Issued

DRAWN BY CP **CHECKED** -- **DATE** 20.04.23

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

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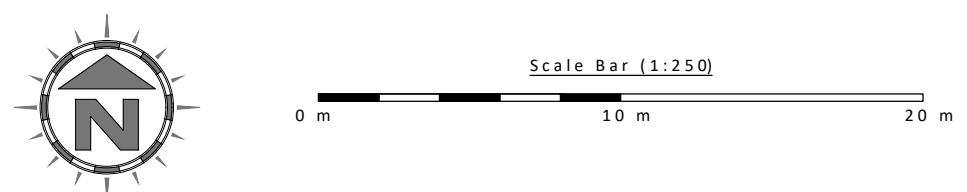
REVISION HISTORY			
Rev	Date	Int	Description
-	07.04.22	CP	Initial drawing
A	20.04.23	CP	Updated site layout



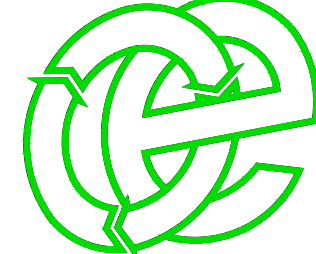
- Key:**
- Permit boundary
 - Waste storage areas
 - Non-waste storage areas
 - Hazardous waste storage areas
 - Non-waste fuels, oils and other liquids storage
 - Temporary waste storage areas (clear prior to shutdown)
 - Waste recycling / storage buildings (impermeable concrete floor)
 - Other buildings i.e. workshops/offices
 - Impermeable concrete surfaces with sealed drainage
 - Contaminated surface water drainage
 - Clean surface water drainage
 - Surface water drainage fall direction
 - Gully's
 - Manholes
 - Quarantine area (with 6m buffer zone) based on AREA 18
 - Hose reels (indicative location)
 - Fire fighting equipment / extinguishers (indicative locations)
 - Plant shutdown (indicative location)
 - Manual fire alarms (break glass / horns) - indicative location
 - Spill kits (indicative location)
 - Designated smoking area
 - Access route for emergency services
 - Fire hydrants
 - Fire assembly points
 - Out-of-hours plant storage
 - Pan, tilt and zone cameras with 360° 50m coverage

Storage Area Details PART 2 OF 2

Plan Ref	Description	Storage type	Containment / type	Height of fire wall (m)	Max Width (m)	Max Length (m)	Max storage height (m)	Approx. Area (m ²)	Conversion factor used	Approx. volume (m ³)	Max storage time
AREA 12	Drained fluids from ELVs comprising, oil, break fluid and screen wash	Unprocessed (liquid)	Double skinned/bunded tanks	N/A	N/A	N/A	1	N/A	1	10,000 litres	<12 weeks
AREA 13	Drained fluids from ELVs petrol, diesel, oil, brake fluid and screen wash	Unprocessed (liquid)	Double skinned/bunded tanks	N/A	N/A	N/A	1	N/A	1	10,000 litres	<12 weeks
AREA 14	Containers of scrap metal	Sealed skip (40 cubic yard)	Sealed skip / concrete panel wall	4.8	6.1	2.44	2.62	15 (per container)	1	40 (per container)	<1 week
AREA 15	Depolluted ELVs awaiting baling	Processed / fully stripped ELV shell	Freestanding / concrete panel wall	4.8	1.85 (per ELV)	4.8 (per ELV)	1.5 (per ELV)	8.325 x 6 ELVs = 50	1	50	<12 hours
AREA 16	Waste vehicle parts	Removed from ELV	Freestanding pile / interlocking block wall	4.8	4	4	1.5	16 (per bay)	0.75	20 (per bay)	<1 week
AREA 17	Waste vehicle parts	Removed from ELV	Freestanding pile / interlocking block wall	4.8	4	4	1.5	16 (per bay)	0.75	20 (per bay)	<1 week
AREA 18	Baled depolluted ELVs & waste vehicle parts	Processed	As above	4.8	13	6.5	1	82	1	82	<1 week
AREA 19A & 19B	Waste tyres and alloys wheels	Removed from ELV	Free standing pile / three-sided interlocking block wall	4.8	13	7	1	91	0.75	68	<1 week



Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
SITE LAYOUT & FIRE PLAN (PART 2 OF 2)

CLIENT
Assington Autos Ltd

PROJECT/SITE
The Breakers Yard, Barracks Road, Assington CO10 5LP

SCALE @ A1
1:250

CLIENT NO
3041

JOB NO
001

DRAWING NUMBER
BAR/3041/03B

REV
A

STATUS
Issued

DRAWN BY
CP

CHECKED
AAL

DATE
20.04.23

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	07.04.22	CP	Application copy
A	20.04.23	CP	Updated site layout + infrastructure improvements

Appendix II

Record Keeping Forms

**ASSINGTON AUTOS LIMITED
REJECTED WASTE - RECORD FORM AAL/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	

**ASSINGTON AUTOS LIMITED
 PREVENTATIVE MAINTENANCE CHECKLIST– AAL/RF/5**

CHECKED BY	POSITION
DATE	DATE OF LAST CHECKLIST

	EQUIPMENT ITEM					
OFFICIAL MAINTENANCE CHECK REQUIRED (Y/N)						
IF NO, DATE OF LAST CHECK						
IF YES, DATE OF NEXT CHECK						
IS ITEM IN CORRECT WORKING ORDER						
LEAKAGES OF OIL/DIESEL ON MOBILE PLANT / VEHICLES						
IF NO, WHAT REPAIRS ARE REQUIRED (USE SEPARATE SHEET IF REQUIRED)						
WERE REPAIRS DETAILED ON THE LAST CHECKLIST						
IF YES, HAVE THEY BEEN CARRIED OUT						
ADDITIONAL REPAIRS OR ACTIONS REQUIRED						

**ASSINGTON AUTOS LIMITED
 EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW - AAL/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:							

**ASSINGTON AUTOS LIMITED
COMPLAINTS REPORT FORM (AAL/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 AAL/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.

ASSINGTON AUTOS LIMITED

PPE RISK ASSESSMENT & RECORD OF ISSUE – AAL/RF/11

EMPLOYEE NAME:		ASSESSMENT DATE:			
HAZARD	AREA EXPOSED TO RISK REQUIRING PROTECTION	TYPE OF PROTECTION REQUIRED	DATE ISSUED	REPLACEMENT IN STOCK	
Falls from height	Cranium	Safety helmet			
Blows, cuts	Ears	Hard hat			
Impact, crushing	Eyes	Face screen			
Stabs, cuts, grazes	Respiratory tract	Safety glasses			
Vibration	Face	Safety goggles			
Slips, falling over	Whole head	Ear plugs			
Scald, heat, fire	Hands	Ear defenders			
Cold	Forearms	Gloves			
Immersion	Arms(part)	Nitrile gloves			
Non-ion. Radiation	Feet	Gauntlets			
Electrical	Legs	Wrist cuffs			
Noise	Skin	Wrist cuffs			
Ionising radiation	Trunk/abdomen	Armlets			
Dust fibre	Whole body	Leggings			
Fume		Knee pads			
Vapours		Safety boots			
Splashes, spurts		S. Wellingtons			
Harmful bacteria		Overalls			
Harmful viruses		Disp. overalls			
Fungi		Protective aprons			
Non microbiological antigens		Hi-vis coat			
Others...		Hi-vis vest			
		Respirators			
		Breathing app.			
		Dust masks			
		Waterproofs			

**ASSINGTON AUTOS LIMITED-
H&S (FIRST-AID) REGULATIONS 1981 - SITE CHECKLIST – AAL/RF/13**

<p>First aid is defined as treatment by a medical practitioner or minor injuries treated by a first aider or not requiring treatment. The first aid box must contain suitable first aid materials and nothing else and only contains items which the first aider has been trained to use. Check items frequently for expiry dates. Items must be stored in a clearly marked box.</p>				
Contents of first aid box - Item	On site	Checked	On skip vehicle(s)	Checked
Guidance card				
Individually wrapped sterile adhesive 'plasters'				
sterile eye pads, with attachment				
individually wrapped triangular bandages				
safety pins				
medium sterile individually wrapped unmedicated wound dressing				
large sterile individually wrapped unmedicated wound dressing				
ex-large sterile individually wrapped unmedicated wound dressing				
0.9% saline solution - eye wash (no other eye bath products allowed)				
THE EMPLOYER MUST				y/n
Make provision for first aid				
Provide equipment/facilities adequate for first aid if employees become ill or are injured at work				
Relate first aid provisions to the hazards on site				
Provide first aid equipment to remote workers				
Place first aid kit in clearly identified/accessible location. Convenient to greatest risk.				
Provide access to first aid facilities for trained first aiders.				
Provide soap and water/ disposable drying materials or non-alcohol cleansing wipes.				
Provide a first aid room in high risk situations				
Train remote workers in emergency first aid				
Provide an appointed person at all times when employees are in work. Not less than 1 first aider per 50 employees.				
Send first aiders on a recognised training course				
Inform employees of arrangements made for first aid i.e. location of equipment, personnel and facilities.				
NOTES				

Appendix III

Environmental Permit and SR2011No3 Permit Conditions

Appendix IV

Health & Safety – Conditions of Site Use

HEALTH AND SAFETY - CONDITIONS OF SITE USE

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

- 1) The site is covered by the Health and Safety at Work Act 1974 and its associated regulations and all users must abide by any relevant provisions. Any person found to be in contravention of the requirements of this Health and Safety Statement will be asked to leave the site.
- 2) All visitors and contractors must sign the visitor's book upon entry to and exit from the site. All vehicle drivers must report to the office and await instruction from the site manager/deputy before proceeding to deposit waste at the site.
- 3) All accidents, diseases, injuries or dangerous occurrences shall be reported to the site manager. All instructions issued by the site manager in respect of health and safety at the site must be followed by all site users.
- 4) A first aid box (including eye-wash bottles) is kept in the site office. If you are injured on site please alert a member of staff/trained first-aider for assistance.
- 5) All persons must wear the appropriate PPE on site including high visibility jackets and hard hat.
- 6) Safety boots must be worn by all persons in the waste sorting/storage areas.
- 7) Protective gloves must be worn for any operations which present a hazard of puncture to or laceration of the skin or for any manual handling work carried out on site.
- 8) Ear defenders, safety helmets (hard hats) and eye protection will be issued when deemed necessary and must be worn by all employees and contractors where required by the site manager or other site representatives.
- 9) Fire extinguishers are kept on site to deal with any fires - fires shall only be dealt with by employees of Assington Autos Limited unless alternative instructions are given by the site manager. Access to fire exits and firefighting equipment must be kept clear at all times. When the fire alarm sounds please follow instructions and leave the site in an orderly fashion.
- 10) Persons who are suspected to be under the influence of drugs or alcohol will be removed from the site.
- 11) Smoking is not permitted on the site.
- 12) Observe and follow all traffic directions and traffic/safety signs.
- 13) Drivers must comply with all safety instructions given by the site manager or appointed deputy.
- 14) All drivers are responsible for ensuring that their vehicle is safely loaded. Unsafe loads will not be accepted at the site and will not be allowed to leave the site until they have been made safe.
- 15) Drivers waiting to tip at the recycling centre 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 Assington Autos Limited nor their employees shall be liable for any loss or injury arising from my non-compliance with the above conditions.

Signed.....

Print name.....

Company/Organisation.....

Date.....

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

Appendix V

Depolluting End-of-Life Vehicles (cars and light goods vehicles) Guidance for Authorised Treatment Facilities March 2011

Depolluting End-of-Life Vehicles (cars and light goods vehicles) Guidance for Authorised Treatment Facilities

March 2011



This guidance document provides advice to Authorised Treatment Facilities (ATFs) on how to depollute passenger cars and light goods vehicles in accordance with the requirements of the End-of-Life Vehicles Regulations (and parallel legislation in Scotland and Northern Ireland), which implement elements of the End-of-Life Vehicles Directive (2000/53/EC). The guide was originally commissioned by DEFRA and DTI (now BIS) from AEA Technology Environment and Universal Vehicle Services. Jema Associates Ltd and David Hulse Consultancy Ltd updated it in December 2005, to reflect latest best practice and to draw upon practical experience gained in the depollution phase of the DTI/CARE shredder trial carried out at GW & G Bridges in June 2005.

This second edition of the guidance incorporates further updates, reflecting the latest available information regarding treatment of airbags and LPG (Liquefied Petroleum Gas) cars. The section on LPG Tanks (4.10) has been expanded.

This guidance does not seek to prescribe how a particular depollution activity should be carried out. There will be safety issues surrounding the carrying out of any depollution activity (see in particular section 1.2 below). Neither Defra nor BIS will accept any liability for death, personal injury or any other damage howsoever arising as a result of undertaking any of the depollution activity covered by this guidance.

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1 Introduction

Between 1.5 and 2 million end-of-life vehicles (ELVs) are generated each year in the UK. These ELVs are classified as hazardous waste, and must be depolluted to certain standards, as a consequence of European and UK legislation, prior to dismantling, crushing, or shredding. All facilities treating ELVs are covered by this legislation.

This brochure contains generic guidance on how to depollute waste passenger cars and light goods vehicles in accordance with the requirements of the End-of-Life Vehicles Regulations. If you carry out the procedures in this guidance, then you should have depolluted an ELV sufficiently for it to be considered to be non-hazardous waste. The same outcome can be achieved even if you do not use these particular guidance methods, provided you have ensured that you can demonstrate the same levels of depollution. Non-destructive methods of removing hazardous components may be carried out, provided that component integrity is not compromised. Additional, model-specific guidance can be found in IDIS, the International Dismantling Information System, published by the Vehicle Manufacturers. (See section 3.2.)

A system for recording the quantity of fluids and other items which have been removed must be in place. The information which is thereby recorded will enable regular reports to be provided to waste regulators and will be needed for the annual reports on ELV recovery and recycling target compliance, as required by the End-of-Life Vehicles (Producer Responsibility) Regulations 2005 and 2010.

This guidance initially briefly covers:

The relevant legislation on ELVs and hazardous waste;
Health and safety considerations;
Equipment and facilities.

The depollution operations which must be conducted to meet the requirements of the legislation are then described.

The depollution procedure is only one stage in the overall process required to treat an ELV. Other operations, such as associated administrative activities, and complying with all existing legislation relating to these activities, still need to be carried out, but are not discussed in this guidance document.

1.1 LEGISLATION

1. The EU End-of-Life Vehicles (ELV) Directive (2000/53/EC), the ELV Regulations 2003, 2005 and 2010 and parallel regulations in Scotland and Northern Ireland
2. The updated versions of both the European Waste Catalogue (EWC) and Hazardous Waste List (HWL) (Commission Decision 2000/532/EC) (the List of Wastes Decision) and its subsequent amendments.

1.2 END-OF-LIFE VEHICLES DIRECTIVE

The ELV Directive introduces measures to promote and increase recycling and to further protect the environment by requiring adequate depollution (e.g. draining of fluids such as engine oil) and sets minimum technical requirements for the treatment of ELVs. Following the introduction of the End-of-Life Vehicles Regulations 2003 (Statutory Instrument 2003, No.2635), ELV treatment facilities carrying out depollution need to be permitted as “authorised treatment facilities” (ATFs) by the Environment Agencies, by holding a permit under the Environmental Permitting (England and Wales) Regulations 2010 or a licence under parallel legislation in Scotland and Northern Ireland. In each case, these pieces of environmental legislation have a wider scope than the ELV Regulations, in that their scope is not restricted to facilities treating only cars and light goods vehicles.

The End-of-Life Vehicles (Producer Responsibility) Regulations 2005 (Statutory Instrument 2005, No.263) implement the producer responsibility, recovery, recycling and associated reporting aspects of the ELV Directive. The two sets of End-of-Life Vehicles Regulations 2010 (Statutory Instruments 2010 No.1094 and 1095) updated the 2003 and 2005 End-of-Life Vehicles Regulations in certain respects.

The depollution requirements of the ELV Directive are given below.

Extract from ANNEX I

Minimum technical requirements for treatment in accordance with Article 6(1) and (3)

3. Treatment operations for depollution of end-of-life vehicles:
 - removal of batteries and liquefied gas tanks,
 - removal or neutralisation of potential explosive components, (e.g. air bags),
 - removal and separate collection and storage of fuel, motor oil, transmission oil, gearbox oil, hydraulic oil, cooling liquids, antifreeze, brake fluids, air-conditioning system fluids and any other fluid contained in the end-of-life vehicle, unless they are necessary for the re-use of the parts concerned,
 - removal, as far as feasible, of all components identified as containing mercury.

The individual hazardous components and materials removed during depollution should be kept separate.

Clearly, ATFs need to remain vigilant for any other hazardous materials or items that might be encountered in the course of their operations.

1.3 LIST OF WASTES DECISION

The European Waste Catalogue (EWC) and Hazardous Waste List (HWL) were first published in 1994. These are used for the classification of all wastes and hazardous wastes, and are designed to form a consistent waste classification system across the EU. They form the basis for all national and international waste reporting obligations, such as those associated with waste licences and permits, and the transport of waste.

Updated versions of both the European Waste Catalogue and Hazardous Waste List were published as a homogenised list of hazardous and non-hazardous wastes in 2001, and came into force on 1 January 2002. The List of Wastes Decision includes ELVs (Category 16 01) and lists a number of hazardous wastes in this category. It has been implemented by the List of Wastes (England) Regulations 2005 (as amended), the List of Wastes (Wales) Regulations 2005, the List of Wastes Regulations (Northern Ireland) 2005 and, in Scotland, by the Special Waste Regulations 1996 (as amended). This list is more comprehensive than that in the ELV Directive, and also applies to all vehicles. The ELV Directive only applies to a specified range of vehicles, by reference to European Whole Vehicle Type Approval legislation. This means vehicles designated as M1 (passenger vehicles comprising no more than 8 seats, in addition to the drivers seat) and N1 (vehicles used for the carriage of goods, having a technically permissible maximum mass not exceeding 3.5 tonnes).

Although the List of Wastes Decision could be interpreted as implying that, for example, every drop of engine oil must be removed in order to classify an ELV as non-hazardous, the cost for achieving this would be high. More importantly, there is likely to be little additional environmental benefit in removing the very small quantity of oil which is likely to remain in practice. Consequently, this guidance document has been prepared based on practical trials that have been shown to achieve an acceptable level of decontamination, which would meet the requirements of both the ELV Directive and the List of Wastes Decision.

1.4 HEALTH & SAFETY CONSIDERATIONS

Vehicle depollution will involve removing fluids and components which may be either explosive or corrosive. The main legislation covering this area includes:

The Management of Health & Safety at Work Regulations 1999 – these impose a duty on employers (and the self-employed) to make a suitable and sufficient assessment of the risks faced by employees at work and by other persons arising out of the work carried out by the employer, to inform employees of the risks, and to prepare emergency procedures.

The Control of Substances Hazardous to Health Regulations 2002 (COSHH) – these impose a duty on employers (and the self-employed) to prevent employees (or the self-employed) from being exposed to hazardous substances (or where that is not reasonably practicable, to adequately control such exposure) as well as other persons who may be affected by the work carried out by the employer.

The Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) – these cover risks of fire and explosion from hazardous substances. They also cover storage.

The Manufacture and Storage of Explosives Regulations 2005 – these require the licensing of storage of certain explosives; appropriate measures to prevent fire or explosion; limiting the extent of any fire or explosion should one occur; and protecting persons in the event of a fire or explosion.

Operators removing or deploying Airbags and other pyrotechnic devices should be properly trained in order to reduce the risk of injury.

From July 4, 2010, operators undertaking the removal of Air Conditioning fluids/gases must be formally qualified under the “F Gas Regulation” (EC No. 307/2008), implemented through the Fluorinated Greenhouse Gases Regulations 2009, which has both safety and environmental implications.

Operators treating LPG powered vehicles should be suitably trained and refer to the guidance in this document.

Hybrid or Electric Vehicles contain a high voltage battery system, which requires special attention to avoid the risk of injury by electrocution. Operators treating these vehicles should be properly qualified and should refer, as a minimum, to the guidance on page 14 of this document, as well as the vehicle manufacturers’ guidance in IDIS.

Further guidance on health and safety considerations can be obtained in the Health & Safety Executive’s leaflets and guides <http://www.hse.gov.uk/waste/dismantling.htm>. Relevant guidance includes: Reducing Ill Health and Accidents in Motor Vehicle Repair (INDG356); Health and Safety in Motor Vehicle Repair and Associated Industries (HSG261); The Safe Recovery of Petrol from End of Life

Vehicles (WASTE10); Safe use of Petrol in Garages (INDG331); A Guide to the Handling and Storage of Airbags and Seat Belt Pre-Tensioners at Garages and Motor Vehicle Repair Workshops (INDG280); Safe Working with Vehicle Air-Conditioning Systems. The Dos and Don'ts (INDG349); Using Electric Storage Batteries Safely (INDG139); and LPG-Fuelled Motor Vehicles (INDG387).

1.5 EQUIPMENT

It is recommended that depollution activities are conducted using equipment which has been specifically designed for carrying out the required depollution operations. The use of such equipment ensures that a high level of depollution (removal, as far as reasonably practicable, of most fluids contained in the ELV) can be achieved in a relatively short time-frame (20-30 minutes per ELV).

ATFs may decide to use alternative methods to achieve the same levels of depollution, but health and safety requirements should never be compromised. An assessment of the risks involved in using alternative methods of depollution must be carried out and measures necessary to comply with relevant health and safety legislation put in place. In addition, if alternative methods are used, these will need to be able to demonstrate that at least the same level of depollution has been achieved.

The majority of commercially available equipment is usually operated pneumatically. Consequently, the compressor used to power this equipment must have sufficient capacity to ensure that the equipment can operate satisfactorily.

1.6 FACILITIES

Sites for ELV treatment and storage (including temporary storage) of end-of-life vehicles prior to their treatment must have:

Sites for Storage

impermeable surfaces for appropriate areas with appropriate spillage collection facilities, decanters and cleanser-degreasers.
equipment for the treatment of water, including rainwater.

Sites for Treatment

impermeable surfaces for appropriate areas with appropriate spillage collection facilities, decanters and cleanser-degreasers.
equipment for the treatment of water, including rainwater.
appropriate storage for dismantled spare parts, including impermeable storage for oil-contaminated spare parts.

appropriate containers for storage of batteries (with electrolyte neutralisation on site or elsewhere), oil filters unless crushed, PCB/PCT containing condensers and any hazardous components identified in IDIS. appropriate storage tanks for the segregated storage of end-of-life vehicle fluids.

appropriate storage for used tyres, including the prevention of fire hazards and excessive stockpiling.

Storage operations are to be carried out avoiding damage to components containing fluids or to recoverable components and spare parts.

DEFRA guidance notes covering this part of the ELV regulations can be found at

<http://www.defra.gov.uk/environment/waste/topics/pdf/elv-guidance.pdf>

The health & safety implications of storing large quantities of hazardous and/or highly flammable materials need to be properly assessed in consultation with the Health & Safety Executive, and the Environment Agencies should be consulted on any environmental implications.

NOTE: If pyrotechnics, e.g. airbags, are removed and stored, an explosives licence and suitable storage facilities will be required. Refer to HSE booklet HSG184 for guidance.

Employers are encouraged to seek specific training, as necessary, for each depollution process and general health and safety. Site managers should also be aware of the requirement to put in place a suitable Health & Safety policy and carry out the risk assessments required.

2 Example of the depollution process

In order to depollute an ELV, a number of operations have to be conducted. An example sequence is shown in Table 1 and the Process Flow Diagram. This was developed from practical trials using one make of proprietary equipment. As a different sequence of operations may be more suitable for other types of equipment, treatment facilities can develop an alternative sequence. However, if a different sequence of operations is developed, this alternative sequence should recognise that it can typically take up to 20 minutes within the sequence for gravity draining of the engine oil.

Table 1 indicates whether an individual operation is best conducted from either above or below the ELV.

Table 1 - Possible depollution sequence

Above / Below (A/B) vehicle	Operation
A	Remove battery
A	Remove fuel filler cap and oil filler cap
A	Set heater to maximum
A	Remove wheels and tyres and separate balance weights
A	Remove any parts identified as containing mercury
Put vehicle onto depollution frame or lifting device	
B	Drain engine oil and remove oil filter for crushing or disposal
B	Drain transmission oil, including rear differential if applicable
A	De-gas air conditioning unit (if fitted)
B	Drain coolant
B	Drain brake fluid
B	Remove catalyst (if fitted)
A	Drain washer bottle
A	Drain brake/clutch reservoir(s)
A	Drain power steering reservoir (if fitted)
B	Drain fuel tank
B	Drain shock absorbers or remove suspension fluid
B	Replace drain plugs/fit plastic stoppers
Remove vehicle from depollution frame or lifting device	
A	Deploy airbags and other pyrotechnics in-situ (if fitted and able to conduct this operation)
A	Remove air bags and other pyrotechnics (if fitted, and can not be deployed in-situ)

Although a number of the below-vehicle operations can be conducted in parallel, the sequence of operations shown in Table 1 maximises the time for gravity draining of the engine oil.

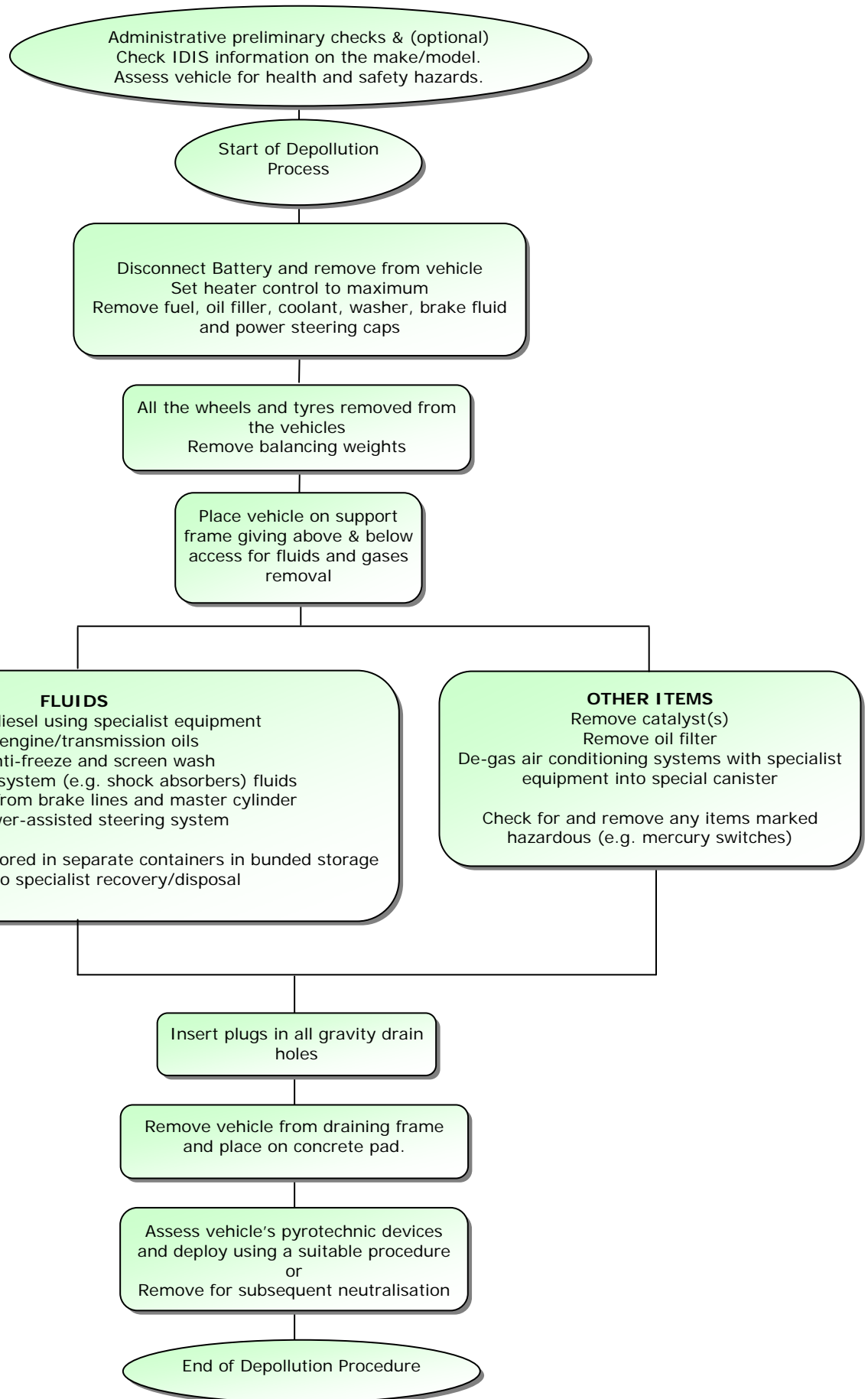
Removal of the wheels/tyres is not a depollution requirement (but removal of lead balancing weights is required). However, removal of the wheels will allow better access for draining of the shock absorbers; depending on the type of equipment being used, it may be easier to perform the above-vehicle depollution activities (such as removal of screen washer fluid) at ground level before the wheels are removed. Tyre removal depends on the individual shredder receiving the depolluted ELV hulks. Only if the shredder can guarantee the removal of tyre material by post shredder technology can tyres be left on the rims – since there has been a ban on the landfilling of shredded tyres since July 2006. Otherwise, tyres must be removed. Of course, tyres can provide a useful contribution of around 3% towards the 85% reuse, recycling and recovery target requirement, set down in the 2005 ELV Regulations.

The depollution sequence shown in Figure 1 and Table 1 can be represented as 3 stages:

- Preliminary activities
- Removal of fluids and other items
- Removal or deployment of air bags

The procedures required to complete each stage are described in the remaining sections of the manual.

After each depollution operation has been conducted, the fluid or item which is removed must be transferred to a suitable storage facility as soon as possible.



3 Preliminary activities

These activities prepare the ELV for the next stage of the process (removal of fluids and other items). The activities which need to be conducted are:

- 3.1 Assess vehicle for health and safety hazards
- 3.2 Use IDIS or other manufacturer guidance to obtain depollution information on the ELV, if required
- 3.3 Determine if ELV has airbags
- 3.4 Remove battery
- 3.5 Remove fuel, oil, and other filler caps
- 3.6 Set heater control to maximum
- 3.7 Remove wheels/tyres
- 3.8 Remove balance weights from wheels
- 3.9 Prepare Electric/Hybrid Vehicles for treatment

All of these activities need to be conducted before the ELV is placed on a support frame or lifting device to enable the below-vehicle activities to be conducted.

All required administrative procedures should be completed before any of the preliminary activities are conducted.

3.1 CHECK FOR HAZARDS

Inspect the vehicle for presence of hazardous items such as glass, hypodermic needles and other biological contamination or fire damage, which might affect the way in which its treatment should be handled. Check for and remove any foreign material such as gas cylinders.

3.2 USE OF IDIS

IDIS (the International Dismantling Information System) has been developed by vehicle manufacturers and provides information on both the depollution and dismantling of ELVs. IDIS should be consulted to obtain information on any specific depollution procedures which may be required, and to obtain information on procedures for removal or in situ deployment of air bags.

The information provided in IDIS is regularly updated. Treatment facilities must ensure that they are using the latest version. (Check IDIS web site: www.idis2.com)

Note: IDIS is one method of obtaining depollution information but is not the only method. Appropriate information should be sought from wherever suitable.

3.3 DETERMINE BY INSPECTION IF THE ELV CONTAINS AIRBAGS

The number of air bags in an ELV can range from 1 (in the steering wheel) to more than 10. Some of these may have already been deployed if the vehicle has been classified as an ELV as a result of damage sustained during an accident.

If a visual inspection identifies that the ELV does contain one or more airbags, and these have not been deployed, then these will have to be either removed for subsequent detonation/disposal or deployed in situ.

It is recommended that, where possible, air bags are deployed in situ using suitable equipment and that all persons deploying airbags attend a suitable training course.

The removal and deployment of airbags are described in Section 5 of this guidance document.

3.4 REMOVE BATTERY

The SLI (starting, lighting, ignition) battery must be removed, for health and safety reasons (prevention of possible electrical discharge igniting fuel), before the fuel tank is depolluted. The battery is easily removed with standard tools.

IMPORTANT NOTE: If the vehicle is Electric Powered or a Hybrid, please refer to the additional guidance on page 13 and the manufacturer's instructions where available.

3.5 REMOVE OR OPEN FILLER CAPS

The fuel, oil filler and other caps should be either removed or opened. This enables the fuel, oil and other fluids to be drained more easily.

3.6 HEATER CONTROLS

In order to ensure that coolant in the heater unit can be drained, the heater controls must be set at the position which would provide the maximum amount of heat.

As there may be health and safety concerns regarding sitting in the vehicle to conduct this operation, it should be done by reaching into the vehicle.

3.7 REMOVE WHEELS AND TYRES

Removing the wheels and tyres will improve access to brakes and shock absorbers for depollution. When removing tyres from rims, the operatives' exposure to dust may be reduced by deflating the tyre first, either by removing the valve, or by piercing the sidewall with a suitable tool if the tyre is not intended for reuse or retreading.

3.8 REMOVE WHEEL BALANCING WEIGHTS

For all wheels, including the spare wheel, any balancing weights must be removed from the wheels and placed in a suitable storage container for recycling. There is a prohibition on the new fitment of lead weights, but there will continue to be a mixture of lead and other materials on wheels for some time as this provision works through, and they will be more easily sorted once removed.

3.9 ELECTRIC/HYBRID VEHICLES

These vehicles contain a High Voltage Electrical System and have particular dismantling requirements for the treatment of the high voltage system before the vehicle can be treated as a regular ELV. It is important to recognize and understand the High Voltage Electrical System and its specifications for safe handling of the ELV.

HYBRID components that have not been dismantled may present a significant risk of injury to people due to their highly energetic properties and because of the potentially hazardous materials they contain. They may also constitute an environmental hazard if their contents are accidentally released. When dismantling any HYBRID components from the vehicle it is essential to use utmost care and to comply with the important safety warnings listed in this document and in IDIS.

Identifying a Hybrid Vehicle

Each manufacturer has their specific identification method for Hybrid Vehicles. Please refer to the manufacturer specific information for further information where available.

There are several common ways for manufacturers to indicate a Hybrid Vehicle model:

- Vehicle Identification Number (VIN). This number is given by the manufacturer and may indicate model specifications such as the use of a High Voltage Electrical System. You must refer to manufacturer specific information to locate and read the information contained in the VIN;
- Logos/ trademarks located on the exterior or engine compartment of the vehicle indicating use of Hybrid Technology. Specific to each manufacturer;
- Instrument cluster (power meter/battery surveillance device) located in the dash.

3.9.1 General Safety Instructions for Dismantling of HYBRID Components

HYBRID components should only be disassembled by suitably qualified personnel who must follow appropriate procedures defined by the manufacturer, which may be found in IDIS. Care must be taken to ensure that the HYBRID components identified by the vehicle manufacturer are dismantled and recovered.

Vehicle dismantlers must ensure that all employees handling HYBRID components familiarise themselves with this generic guidance and any additional information that may be provided in the manufacturer specific documents. All relevant health and safety regulations together with the vehicle manufacturers' instructions for the handling and safe treatment of the vehicle itself and the HYBRID components must be observed.

High voltage electricity is contained in a battery pack (commonly referred to as an HV battery pack) and generally powers an electric motor, generator, electric inverter compressor (for air conditioner) and inverter, in today's hybrid electric vehicles. The voltage of the battery pack will vary according to the manufacturer. Current models may have up to several hundred volts. There is also a normal 12 volt car battery, which is used to power other low voltage electrical devices such as the radio, horn, headlamps, and instrument cluster gauges.

3.9.2 Turn off the vehicle

Hybrid Vehicles must be turned off in three separate steps:

- a) Turn off the engine.
- b) Disconnect the cables from the conventional 12V car battery.

c) Isolate the High Voltage Electrical System by removing the service plug or turning off the isolation switch (manufacturer specific). If the service plug/switch is not accessible or visible, please see manufacturer specific information or IDIS.

By waiting for 10 minutes after removing the service plug or turning off the switch, the high voltage system is shut off or discharged so there is no high voltage outside the battery pack. However, the battery itself located inside the battery pack still keeps its voltage. After removing the HV battery, do not reinstall the service plug.

3.9.3 Disconnection and Removal of the High Voltage Battery Pack

Before disconnecting the high voltage cable terminals, make sure that the voltage between the terminals is at 0 Volts with a voltmeter.

- a) Disconnect the HV battery connection cables from the HV battery.
- b) Insulate the vehicle HV battery connection cables using electrical insulation tape (to prevent short circuiting).
- c) Consult the manufacturer specific information in IDIS for removal of the battery pack.

Once the battery pack has been removed, the vehicle can be dismantled in the normal way.

3.9.4 High Voltage Battery Storage

- a) Store the Battery Pack where the batteries are kept dry and are not exposed to high temperatures
- b) Protect batteries from being damaged (punctured or crushed).
- c) Batteries should be stored by battery type (e.g. NiMH), according to national legislation (not mixed with lead acid batteries).

3.9.5 Recycling of Batteries

Waste propulsion batteries in Hybrid Vehicles are classified as “industrial” under the Waste Batteries and Accumulators Regulations 2009, which prohibit their disposal by landfilling or incineration, and require their recycling via Approved Battery Treatment Operators or Approved Battery Exporters. Details of the UK “producer responsibility” regime for industrial, and other types of batteries can be found on the BIS website at www.bis.gov.uk.

4 Removal of fluids and other items

The activities which need to be conducted are:

Fluids	Other items
Drain engine oil and remove oil filter	Remove catalyst (if fitted)
Drain transmission oils	Drain air conditioning refrigerant (if fitted)
Drain coolant	Remove LPG tank (if fitted)
Drain hydraulic oils	Identify and remove items containing mercury
Drain screen-washing fluid	Identify and remove other hazardous items
Drain fuel tank	
Drain suspension system/shock absorbers	

All fluids of differing types (e.g oils, water-based etc.) which are removed will need to be stored in separate containers in a bunded storage area prior to specialist recovery or disposal. As a minimum, separate containers will be required for fuels (petrol and diesel separate); oils (lubricating, transmission, power steering and shock absorber oils together); brake fluid (separate); and water based (coolant and screenwash together). (The Waste Oils Directive seeks to promote the regeneration of oils, and any mixing of other fluids with oils may restrict this possibility.)

The ELV will need to be placed on a support frame or lifting device, to allow easy access below the vehicle, before a number of these operations can be conducted. It is preferable that the device should be adjustable to suit the height of the operator. Although access to the underneath of a vehicle could be provided by placing it above a pit, there are health and safety issues with this approach, particularly with regard to possible build-up of fuel vapour in the pit (and hence risk of explosion/fire) during the depollution procedure. Consequently, the vehicle must be placed on a support frame which enables easy access to the underside of the vehicle at ground level. Care should also be taken to avoid any vapour build up in floor mounted drip trays.

The first activity to be conducted is to start draining of the engine oil. Other activities can be conducted in parallel, but the engine oil can typically take 20 minutes to reach the point where no further draining is visible.

It is recommended that depollution activities are conducted using equipment which has been specifically designed for carrying out the required depollution operations. The use of such equipment, while not essential, ensures that a high level of depollution can be achieved in a relatively short time frame (20-30 minutes per ELV).

The guidance presented in this section of the document describes the procedures which need to be conducted in order to achieve the required level of depollution. The instructions provided with any commercial equipment being used must also be followed in order to ensure that this level of depollution is achieved.

After depollution, all gravity-drained holes must be plugged, either with their own drain plug or a suitable plastic bung, to prevent any residual leakage.

4.1 ENGINE OIL

This is gravity-drained by removing the drain plug at the bottom of the sump and collecting the oil. If commercially available equipment for collecting the oil is not used, the oil should be collected in a suitable container which has a minimum volume of 10 litres.

The oil must be allowed to drain for a minimum of 20 minutes from the engine, or until such time as no visible further draining of oil is occurring.

4.1.1 Oil filter

The oil filter must be removed. This should be done by using a suitable spanner/tool which does not puncture the oil filter during removal.

The oil filter must be treated to remove residual oil. This can be achieved by crushing the filter and recovering the oil. Commercial equipment which performs this function is available. Alternatively, the oil filters can be sent to a suitable treatment facility using leakproof transit packaging.

4.2 TRANSMISSION OILS

Transmission oil is contained in both manual and automatic gearboxes, and in the rear axle differential of rear wheel drive vehicles.

4.2.1 Manual gearbox

If the gearbox has a drain plug, it can be gravity-drained by removing the drain plug and collecting the oil in a suitable container which has a minimum volume of 5 litres.

The oil must be allowed to drain for a minimum of 10 minutes with no visible further draining occurring.

Gearboxes which do not have a drain plug must be drained by drilling or piercing a suitably sized hole in the bottom of the gearbox. Commercial equipment includes a suitable drill or punch, provides suction to assist in draining the gearbox, and collects the oil without the need for a container underneath the gearbox.

Such commercial equipment can also be used to drain gearboxes that do have a drain plug.

4.2.2 Automatic gearbox

Oil has to be drained from both the gearbox and the torque converter. These may be combined in a single unit, but the torque converter on some types of gearboxes is separate from the main gearbox unit.

The procedure for draining these is the same as for a manual gearbox.

4.2.3 Rear differential

Most modern cars are front wheel drive and so do not have a rear differential unit. However, many small commercial vans and some larger cars have rear wheel drive.

The procedure for draining these is the same as for a manual gearbox. Those that do not have a drain plug may be drilled or, alternatively, the differential flange may be loosened and prised open to allow the oil to drain.

4.2.4 Power steering oil

If the ELV has power steering, fluid has to be extracted from both the reservoir and the connecting hose. Equipment similar to that used to extract brake fluid from the brake reservoir (see below) can be used to extract fluid from the power steering oil reservoir. Fluid is then removed by piercing the hose and sucking out the fluid or cutting it at the lowest point and allowing the fluid to gravity drain.

4.3 HYDRAULIC OILS

All ELVs contain brake fluid. A small number of older vehicles may also have a hydraulic clutch.

4.3.1 Brake fluid

Commercial equipment uses pressure and suction on both the reservoir and the brake pipes and cylinders (fluid is sucked from the bleed nipples) to remove the fluid. Brake fluid could also be removed from an ELV by opening the brake bleed nipples and then pumping the brake pedal until

the reservoir is emptied (the fluid would be discharged through the open nipples). However, there are health and safety concerns relating to an operative sitting in an ELV, and this approach removes a lower percentage of brake fluid than commercially-available equipment. Consequently, in order to achieve the required percentage of removal, brake fluid should be removed using equipment which uses suction and/or pressure on both the reservoir and the brake pipes and cylinders.

Drainage time of 10 minutes, no visible fluid left in the reservoir and with no visible further drainage following removal of suction equipment.

4.3.2 Clutch fluid

Virtually all modern cars have cable clutches and so do not contain any hydraulic clutch fluid. Some older cars may have hydraulic clutches, and equipment similar to that used to extract brake fluid from the brake reservoir can be used to extract fluid from the clutch reservoir and slave cylinder.

4.4 COOLANT (ANTIFREEZE)

Coolant can be gravity drained by removing the bottom hose from the radiator and collecting the liquid in a suitable container with a minimum volume of 10 litres. Commercial equipment enables the operator to make a hole in the bottom hose and suck the coolant out through this hole into a container. Either method can be used, but will only be able to achieve a high level of removal if the heater valve is set to maximum as part of the preliminary activities and the filler cap is removed.

Drainage time of 10 minutes, with no visible further drainage occurring.

4.5 SCREEN WASHING FLUID

This is removed by sucking fluid from the reservoir. The pipe placed in the reservoir has to be long enough to reach the bottom of the reservoir. Some models have fluid reservoirs with bent filler pipes in which it may be difficult to place a suction pipe to the required depth. In these cases, it may be preferable to drain them from below by removing the pump or piercing the reservoir.

Either commercially-available equipment or a simple pump can be used. If a simple pump is used, the reservoir must be inspected to determine that it has been completely emptied.

Most cars have one reservoir container that supplies fluid to both the front and rear windows, but some cars may have a separate container (in the

boot) for the rear window. If a vehicle has more than one reservoir, then all reservoirs must be drained.

End point – no visible amounts of fluid in the reservoir/s.

4.6 FUEL TANK (NOT LPG – SEE SECTION 4.10)

Fuel can be removed by suction or siphoning it from the tank with a tube entering the tank through the fuel filling pipe, but this procedure is unlikely to achieve the required level of depollution.

In order to ensure that the required level of depollution is achieved, a hole should be pierced or drilled into the lowest point of the fuel tank and suction is used to remove fuel. This ensures that no vapour is released during extraction.

The health and safety issues associated with fuel extraction mean that the drill or piercing tool should be made of suitable non-sparking material and be pneumatically powered, and an earthing connection must be made between the vehicle and the extraction equipment. Commercially available equipment should meet both these requirements.

The design of the tank (for example a saddle shaped tank will have two low points), may require more than one hole to be drilled or pierced in order to extract all of the fuel.

End-point – no visible further removal of fluid observed in the (see-through) extraction tubing.

There is no requirement to remove any residual fuel from the injector/carburettor inlet pipe in the engine compartment.

4.7 SUSPENSION SYSTEM

The suspension system on most vehicles is provided by 4 independent shock absorbers (one for each wheel). However, alternative systems are used in some vehicles.

4.7.1 Shock absorbers

The recommended approach is to drain the fluid from the shock absorber without removing it from the ELV. Shock absorbers contain fluid, usually oil, in both an inner and an outer cylinder. Consequently, in order to achieve the required level of depollution, fluid/oil needs to be removed from both the inner and the outer cylinder.

Commercially-available equipment can achieve the required level of depollution, but the time required for this operation will depend on the design of the equipment. The instructions provided by the manufacturer must be followed.

Shock absorber fluid/oil could be removed from an ELV by removing the shock absorbers, but the time required to conduct this operation may be considerable, and the shock absorbers would be classified as hazardous waste after they were removed from the ELV.

4.7.2 Gas shock absorbers

The equipment designed for fluid/oil based shock absorbers may be suitable for safely removing the gas from gas suspension systems. This must be confirmed with the manufacturer of the equipment before it is used for this purpose, and any additional safety requirements or other instructions provided by the manufacturer must be followed.

4.7.3 Sealed suspension systems

Equipment is available for both removing and recharging these, and thus can be used to drain them. An alternative approach is to fit a tyre valve adaptor to the filling/draining valve; this then enables the liquid to be gravity-drained in about 20-25 minutes. Care should be taken when attaching the adaptor to prevent the pressurised fluid causing injury to the operator.

Note that the unique hydrolastic suspension fluid used in MG Rover Metro/100 models is a water based fluid containing methanol, and should therefore be stored together with coolant and screenwash, rather than with the oils.

No visible further draining of fluids should occur after the above procedures.

4.8 CATALYST

Older ELVs may not possess a catalyst, but nearly all modern vehicles, particularly those registered since 1993, both petrol and diesel, will have a catalytic conversion unit in the exhaust system. The catalyst can be identified by visual inspection of the exhaust system.

Note: although not strictly a depollution activity, this is a preparation for recycling activity, the financial benefits of which can generally be exploited to offset the costs of depollution.

The catalyst unit can easily be removed by cutting through the exhaust pipe, both in front of, and behind, the catalyst unit. The use of the correct

cutting equipment reduces the time which is required for this operation. Some vehicles may have more than one catalyst unit.

4.9 AIR CONDITIONING REFRIGERANT

The two types of refrigerant that are used in vehicle air conditioning systems are R12 and R134a. The type of refrigerant is marked on the vehicle.

The refrigerant must be removed using specialist equipment, and two collection cylinders are required; one for R12 (a CFC) and one for R134a (an HFC). The equipment is attached to the air conditioning filler valve, and takes about 10-12 minutes (the time depends on the system and the ambient air temperature) to remove all the fluid and transfer it to the collection cylinder.

ATFs should note that new EU Regulations (EC 307/2008) concerning qualifications for persons dealing with "F Gases" such as vehicle air conditioning systems came into force in April 2008. These require relevant operatives to be formally trained and in possession of a duly accredited certificate of competence.

4.10 LPG TANK

Identifying an LPG Vehicle. An LPG vehicle may or may not have identification badges, but can often be recognised by the presence of an additional filler connection valve, adjacent to the normal petrol filler. The absence of a spare wheel, or anywhere to put one, is another clue. In the engine compartment, there will normally be additional pipework and wiring from the control modules that handle the switching between petrol and LPG. If feasible, it is best to run the engine to empty as much fuel as possible from the tank before commencing removal, as this will reduce the weight of the tank and the risk of vapour loss. NOTE: Even after running to empty, the tank will still contain some residual gas vapour, and the full removal procedure must still be followed.

IMPORTANT NOTE: LPG, which is mainly used in some cars and light goods vehicles, should not be confused with Compressed Natural Gas (CNG), which has been used as original equipment in some commercial vehicle and PSV applications. CNG is equally hazardous, but is stored at a much higher pressure. Only fully qualified technicians should deal with CNG vehicles in accordance with the vehicle manufacturer's instructions.

Currently, very few ELVs in the UK have LPG tanks, but the number is expected to increase in the future. The usual procedure for removing these is to:

- 1. Turn off the isolating valve**
- 2. Cut through or disconnect the connecting pipes**
- 3. Cut through or remove the retaining clamps or straps**
- 4. Remove the tank to safe storage**

Given that there are health & safety issues involved with removal, handling and storage of LPG tanks, ATFs are recommended to check with the Health & Safety Executive (HSE) on current guidance. Only suitably trained personnel should be allowed to work on LPG vehicles before the LPG tank is removed. Some further generic guidance is now included in IDIS.

LPG liquid is a gas under pressure, which expands rapidly as it emerges causing a severe temperature drop in the vicinity of its release. Anyone attempting to disconnect the tank connections should therefore be equipped with hand and eye protection to avoid freezing.

The gas itself is highly inflammable and heavier than air, so can build up to dangerous levels in low places such as pits or drains, hence the requirement to treat the vehicle in the open air, where the gas can dissipate safely.

The vehicle should be quarantined in an open area, so that the tank can be isolated and removed for emptying, purging and separate disposal by suitably qualified personnel. The vehicle should be checked for gas leaks using proprietary detection equipment, especially in the vicinity of the tank connections and in the spare wheel well. If the battery is situated close to the LPG tank, for example in the boot, it should not be disconnected until it is certain there are no gas leaks to eliminate the risk of an electrical spark igniting the gas.

If there is a gas leak, this must be dealt with as a priority. If there are no qualified personnel on site, the urgent assistance of a local LPG installation company should be sought.

Under no circumstances should an LPG equipped vehicle be baled and/or sent to the shredder with the LPG tank still installed or intact, even if thought to be empty, as any residual gas in it would still be explosive. Neither should the tank, which is pressurised, be drilled or pierced to remove the LPG.

After the tank has been removed, the remainder of the vehicle can be processed as a normal ELV. The LPG injection equipment in the engine compartment and the pipes leading to it do not have to be removed. The tanks themselves are heavy and should be handled using appropriate lifting tools or supporting frames to avoid injury to personnel.

Information on the treatment of removed LPG tanks should be sought from authoritative sources (e.g. the LPG tank supplier or conversion company, the LPG Association, CARE Group etc.). ATFs may decide that subsequent emptying, purging and destruction of LPG tanks should be carried out by specialist third party decommissioners. Removed tanks should be stored in the open air in appropriate racks/cages until they can be collected or treated by the qualified disposal agents.

4.11 SWITCHES CONTAINING MERCURY

Some switches, such as tilt-based switches, may contain mercury. The ELV Directive requires switches which contain mercury to be removed. It would be a long (and hence costly) process to remove all switches in case they contain mercury.

An acceptable level of depollution will be achieved if any switches which are clearly marked as containing mercury are removed. A visual inspection of areas which contain this type of switch must be made during the depollution procedure, but only switches which are clearly identified as containing mercury need to be removed.

4.12 OTHER HAZARDOUS ITEMS

Some older ELVs may contain asbestos (e.g. certain brake pad linings). Regulations require the location of any components that may contain asbestos to be identified on the vehicle. A visual inspection of the vehicle must be made during the depollution procedure to identify if the ELV contains any notices indicating parts that contain asbestos. If any asbestos containing components are identified during this procedure, they must be removed. The procedure used to remove the asbestos containing components must follow all health and safety guidelines relating to asbestos.

ELVs also contain other hazardous items, such as the liquid crystal displays (LCDs) used in instrument panels in newer vehicles. There is currently no requirement to remove any of these items, but further guidance may be provided in due course.

5 Removal or deployment of air bags

The ELV Directive requires all pyrotechnic devices, such as airbags or pyrotechnic seat belt pre-tensioners, to be either removed or deployed because they are classed as explosive components. Pyrotechnic devices are deployed either mechanically or electrically depending on vehicle type and year. It is therefore necessary to assess every vehicle for airbag type and quantity, and any other pyrotechnic devices that may be present in order to adopt a safe procedure. Manufacturers' advice should be sought if not provided in IDIS.

Anyone attempting deployment of pyrotechnics needs to be aware of:

The different types of airbags and pyrotechnic devices contained in a vehicle;
Method of deployment, mechanical or electrical;
Health and safety issues regarding deployment, removal and disposal.

Only appropriately trained personnel should carry out airbag deployment or removal. The CARE website lists a suitable airbag deployment training course, see www.caregroup.org.uk.

The majority of airbags are electrically deployed, either from a single direct connector or a Deployment Control Unit. Before any work is carried out on electrically deployed airbags they should be disabled by disconnecting the battery. Following battery disconnection, a minimum period of 30 minutes must be allowed before any work is carried out on airbags to allow any residual charge left in the system to dissipate. In some instances, a supplementary battery back-up system can be found, which will normally be indicated by a flashing LED on the steering wheel, which indicates the airbag circuit is still active. Check IDIS for details.

It is possible for undeployed air bags to be removed and stored. However, as they are classed as explosive devices, the storage facility would have to meet all relevant regulations and requirements for storage of explosive materials, including those relating to health and safety. Many modern cars contain at least two airbags, and some luxury cars may well have more than 10 air bags. Removal of all airbags would be a time consuming process. Consequently, the recommended procedure is to deploy the airbags within the vehicle where possible. If it is not possible to deploy the airbag within the vehicle, remove the airbag and deploy it immediately.

Commercial equipment for the deployment of all electrical pyrotechnics is available but, as different air bags use different connections, a number of adapters will be required. Manufacturers' advice should be sought, if not provided in IDIS.

Airbag deployment should be conducted outside in a secure non-hazardous area.

If air bags are deployed *in situ*, measures must be implemented to ensure that neither the operator of the equipment, nor any other person, is within 10 metres of the vehicle when the air bags are detonated.

The level of noise produced during the deployment of air bags must be assessed, and may need to be discussed with the local authority, particularly if the treatment facility is close to a residential area.

Gases and particulates are generated during deployment of pyrotechnic devices. Once all devices have been deployed, doors should be opened to thoroughly ventilate the vehicle before re-entering the vehicle for any removal operations. Once deployed, pyrotechnic devices are neutralised and can be left within the vehicle.

The explosives used within airbags (before deployment) are toxic and are hazardous to health. As they are sealed into the generator in manufacture, exposure to these chemicals during normal handling is highly unlikely; however if a generator is split open extreme care is needed; see Health and Safety guidelines, HSG184.

Although this guidance describes the general procedures, ATFs should ensure that risks have been assessed and any specific guidelines provided by vehicle manufacturers or tooling manufacturers are followed.

5.1 SEATBELT PRE-TENSIONERS

ELVs that contain air bags may also contain seatbelt pre-tensioners. These are designed to pull the seat belt tight at the same time as the airbags are deployed, to clamp the seat belt wearer to the seat preventing them from gaining too much acceleration or twisting before they hit the airbag. Pre-tensioners may contain explosive or have stored mechanical energy (large spring) that is deployed mechanically or electrically. If they contain explosive devices, they need to be deployed as part of the depollution procedure. Manufacturers' guidance on the identification, removal and deployment of seat belt pre-tensioners should be sought, if not in IDIS.

The use of a procedure that enables electrically deployed air bags to be detonated in-situ via the common connector will also detonate electrical seat belt pre-tensioners. Consequently, in-situ detonation at the same time as air bags is the recommended approach for these items, where possible.

6 End of depollution procedure

When all of the depollution activities described in this guidance document have been conducted, the ELV is classified as non-hazardous waste. The ELV can then be recycled.

All fluids and other items which have been removed (apart from any air bags which have been deployed) will still be classified as hazardous waste. These will need to be stored in suitable storage facilities, which meet all regulations, until they are either treated or sent for recycling or disposal through a suitably licensed waste management contractor.

A system for recording the quantity of fluids and other items which have been removed should be in place. The information which is recorded will enable regular reports to be provided to waste regulators, and inform annual ELV target performance returns. A proforma table can be found on the BIS website at:

<http://www.bis.gov.uk/policies/business-sectors/environmental-and-technical-regulations/environmental-regulations/end-of-life-vehicles>

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Any enquiries regarding this publication should be sent to:
Department for Business, Innovation and Skills
1 Victoria Street
London SW1H 0ET
Tel: 020 7215 5000

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