



EMR Group Limited

# Environmental Management Plan

EMR Derby Version 01 June 2026

## 1.2.13.16 E12-11 Environmental Management Plan Template

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### Document History

| Version | Date      | Author         | Description            |
|---------|-----------|----------------|------------------------|
| 1       | June 2026 | Everal Burrell | New Permit Application |

### Introduction

The following Environmental Management Plan (EMP - formerly known as a Working Plan) has been produced by EMR Group Ltd hereafter referred to as (EMR) to support the Environmental Permit for EMR Derby, Mansfield Road, Derby, DE21 4AW, operated as a Metal Recycling Site (MRS) submitted to the Environment Agency hereafter referred to as (EA). The content of this EMP and the

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assessments contained within have been produced based on the requirements as set out in the EA guidance documents: 'How to comply with your Environmental Permit' guidance and specification document 2010 (formerly Working Plan Guidance).

The site consists of an area, covering approximately 1.7 hectares, the grid reference for the centre of the main site is SK 36051 37785.

The permitted area is shown outlined in green in the environmental permit and attached as Appendix 1.

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

The company's registered office is:

EMR Group Limited  
Sirius House  
Delta Crescent  
Westbrook  
Warrington WA5 7NS

Registered in England and Wales No. 2954623

|                          |            |                 |   |                        |                                         |                         |              |
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### Section 1 – Site Description and Characterisation of Risk Source

#### 1.1 Location of Site/Community/Sensitivity

The site is situated on Mansfield Road, Derby DE21 4AW at grid reference SK36051 37785. Access to the site is on Mansfield Road, off Sir Frank Whittle Road (A61).

The site is on the Parker Industrial Estate, located between a railway line to the west and the A61 to the east. The River Derwent is around 650 metres west of the site at its nearest point. The industrial estate is a combination of mainly commercial, industrial and recreational, with the nearest receptors being within 50 metres southwest of the site boundary. The nearest residential receptors are approximately 450 metres to the southeast and southwest of the site boundary.

The site is in flood zone 3, which means there is a high probability of flooding.

#### 1.2 Specified Site and Waste Management Operations

See section 4.4

#### 1.3 Permitted Wastes

| Waste Code | Description                                                                                                 |
|------------|-------------------------------------------------------------------------------------------------------------|
| 02 01 10   | Waste metals                                                                                                |
| 12 01 01   | Ferrous metal filings and turnings                                                                          |
| 12 01 03   | Non-ferrous metal filings and turnings                                                                      |
| 15 01 04   | Metallic packaging                                                                                          |
| 15 01 06   | Mixed packaging                                                                                             |
| 16 01 04*  | End of life vehicles                                                                                        |
| 16 01 06   | End of life vehicles containing neither liquids nor other hazardous components.                             |
| 16 01 17   | Ferrous metal                                                                                               |
| 16 01 18   | Non-ferrous metal                                                                                           |
| 16 01 21*  | Hazardous vehicle components - other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14 |
| 16 01 22   | Discarded components not otherwise specified                                                                |
| 16 02 09*  | Transformers and capacitors containing PCBs                                                                 |
| 16 02 10*  | Discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09               |
| 16 02 11*  | Discarded equipment containing chlorofluorocarbons, hydrochlorofluorocarbons and hydrofluorocarbons         |
| 16 02 12*  | Discarded equipment containing free asbestos                                                                |
| 16 02 13*  | Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12      |
| 16 02 14   | Discarded equipment other than those mentioned in 16 02 09 to 16 02.13                                      |
| 16 02 15*  | Hazardous components removed from removed from discarded equipment                                          |

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|           |                                                                                                                                           |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------|
| 16 02 16  | Components removed from discarded equipment other than those mentioned in 16 02 15                                                        |
| 16 06 01* | Lead batteries                                                                                                                            |
| 16 06 02* | Ni-Cad batteries                                                                                                                          |
| 16 06 03* | Mercury containing batteries                                                                                                              |
| 16 06 04  | Alkaline batteries except 16 06 03                                                                                                        |
| 16 06 05  | Other batteries and accumulators                                                                                                          |
| 17 04 01  | Copper, bronze, brass                                                                                                                     |
| 17 04 02  | Aluminium                                                                                                                                 |
| 17 04 03  | Lead                                                                                                                                      |
| 17 04 04  | Zinc                                                                                                                                      |
| 17 04 05  | Iron and steel                                                                                                                            |
| 17 04 06  | Tin                                                                                                                                       |
| 17 04 07  | Mixed metals                                                                                                                              |
| 17 04 10  | Cables containing oil, coal tar and other hazardous substances                                                                            |
| 17 04 11  | Cable other than those mentioned in 17 04 10*                                                                                             |
| 19 01 02  | Ferrous materials removed from bottom ash                                                                                                 |
| 19 10 01  | Iron and steel waste                                                                                                                      |
| 19 10 02  | Non-ferrous waste                                                                                                                         |
| 19 12 02  | Ferrous metal                                                                                                                             |
| 19 12 03  | Non-ferrous metal                                                                                                                         |
| 20 01 23* | Discarded equipment containing chlorofluorocarbons                                                                                        |
| 20 01 33* | Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries. |
| 20 01 34  | Batteries and accumulators other than those mentioned in 20 01 33                                                                         |
| 20 01 35* | Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components         |
| 20 01 40  | Metals                                                                                                                                    |

### 1.4 Site Plan

See site plan - Appendix 1

### 1.5 Hours of Operation

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

|                   |            |          |   |                 |                                         |                  |              |
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| Day                         | Opening hours |
|-----------------------------|---------------|
| Monday to Friday            | 0700 - 1900   |
| Saturdays                   | 0800 - 1400   |
| Sundays and Public Holidays | Closed        |

### 1.6 Environment Permit

The Environmental Permit will be displayed in a prominent place (e.g. notice board) and replaced by a new copy if they go missing or are defaced in anyway. Operational staff will be made aware of permit requirements by site management staff.

The Depot Manager (normally Technically Competent person) and other key staff / supervisors will be familiar with the Environmental Permit and its requirements.

### 1.7 Staff Competency and Training

The site will be staffed by person (s) who are Technically Competent and have undergone technical competency (TCM) training or a technically competent person shall be available for the site. Certain relevant key staff (e.g. depot manager) will also undergo CoTC /WAMITAB / NVQ training (or equivalent) or be scheduled to attend the relevant course.

The Environment Agency will be informed if there is a change in the Technically Competent Manager (TCM) for the site.

All other staff will receive training suitable for their roles. Other updates will be provided via toolbox talks and/or huddles.

## Section 2 – Site Infrastructure

### 2.1 Provision of Site Identification Board

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

- Site Name & Address
- Environmental Permit Holder Details
- Operators Details
- EMR Emergency Out of Hours Contact Numbers
- Opening Times
- Environmental Permit (Waste Management Licence) No.
- Environment Agency Contact Numbers

In the event that the board is damaged or information on it needs to be updated a new board will be ordered and fitted.

### 2.2 Site Security

|                   |            |          |   |                 |                                         |                  |              |
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The site will be always kept closed and secure when unattended. The security measures detailed will be regularly inspected. Any defects to the perimeter fencing shall be made secure by temporary repair by the end of that working day and shall be fully repaired as soon as practicably possible.

The site entrance is secured by metal lockable gates to the south of the site. The perimeter fence is a combination of metal and concrete panels, as well as bricks. The site also employs CCTV and motion sensors as extra security measures. Security checks on all systems will be carried out by the site manager each week.

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

### 2.3 Lighting

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

The lighting will be regularly inspected. Any defects shall be fully repaired as soon as practicably possible.

All defects, damage and repairs will be recorded on site.

## Section 3 – Site Engineering and Controls for Pollution Prevention and Control

### 3.1 Engineered site containment and drainage systems (includes effluent collection systems)

#### 3.1.1 Impermeable Site Surfaces

The site will mostly be provided with an impermeable concrete surface and sealed drainage system. The waste storage and processing will be undertaken either within buildings or on the impermeable surface. The site has a covered ELV processing area that is also fully impermeable. There is also a non-ferrous building.

All storage of scrap metal prior to processing will be on an impermeable surface. The impermeable surfaces will be maintained to ensure that contaminated fluids do not enter permeable areas of the site.

#### 3.1.2 Sealed Drainage Systems

(see drainage plan Appendix 2 to be submitted)

Surface water runoff from the site's impermeable surface, will drain into the sealed drainage system. This will enter the site's oil separating interceptors before discharging to foul sewer.

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### 3.1.3 Bunded Areas

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

Where authorised contractors are used to remove accumulations of contaminated liquids from bunds on site, copies of transfer notes will be retained within the site's environmental files.

### 3.1.4 Maintenance Schedules

Tanks and bunds will be checked for integrity on a regular basis. Any defects noticed will be made temporarily secure by the end of the working day with permanent repairs being instigated as soon as practicably possible. Inspections, defects, damage and repairs will be recorded in the site diary, or environmental files.

Drainage systems including gullies, drains, drain covers and interceptors will be inspected regularly. Site interceptors shall be emptied by an authorised contractor in accordance with the manufacturer recommendations, who state that oil and diesel should be removed when capacity reached. Site interceptors shall be emptied at a suitable frequency.

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

## SECTION 4 - Site Operations

### 4.1 Waste acceptance and control systems & procedures

#### 4.1.1 Waste Acceptance

Vehicles arriving at the site enter the main gates and pass through radiation detectors, drive onto the weighbridge located inside the main entrance. At this point, the load is checked visually for its suitability for processing at the site (i.e. if waste and EWC code are permitted to be accepted and processed on site) and checked against the waste description (and EWC code) of the load provided on the waste transfer note/weighbridge ticket. In the event that unacceptable (non-permitted) wastes are discovered at this point, the load shall be quarantined and / or rejected from site and the details recorded on site.

Non-ferrous metals will be weighed into site via the main weighbridge however smaller loads of non-ferrous metals may be directed to the non-ferrous area (small scales) to facilitate smaller materials individually weighed, inspected and accepted.

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

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

Written records of all rejections are maintained by weighbridge staff.

### 4.1.2 Waste Rejection Procedure

If non-conforming materials are detected after initial inspections, these will be segregated on discovery and quarantined in an appropriate area. An assessment will be made of the properties of the waste and if necessary, specialist advice obtained regarding handling and disposal. Details of non-conforming materials will be recorded on site.

### 4.1.3 Hazardous Wastes

All hazardous waste accepted at the site will need the appropriate consignment paperwork in accordance with the hazardous waste legislation and industry guidance. These wastes will then be stored in appropriately engineered areas.

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

### 4.1.4 Wastes Containing Liquids

The site does not accept liquid waste, other than those within ELVs. The site will not accept tanks or drums unless they have been confirmed as having been purged of their contents through provision of a purge certificate or via suitable inspection points being provided.

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Liquids and other hazardous components shall be drained or removed from End-of-Life Vehicles (ELVs) in accordance with the End-of-Life Vehicle Regulations. All storage and treatment of un-depolluted ELVs shall take place on an impervious surface served by a sealed drainage system.

### 4.1.5 Pressurised Containers

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

Records of the collection of gas cylinders shall be retained in the site's environmental files.

### 4.2 Waste Sampling and Testing

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

### 4.3 Waste Quantity Measurement Systems

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

The site's weighbridges are calibrated on an annual basis under service contract and more regularly if required when maintenance is undertaken.

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

### 4.4 Storage of Specified Wastes

Wastes with particular properties may require additional storage and processing controls to manage potential risks to the environment.

#### 4.4.1 Storage and Depollution of End-of-Life Vehicles

The main specified treatment process undertaken on site is the storage and depollution of ELVs. Liquids and other hazardous components will be drained or removed before they can be further processed by baling, shearing or shredding and eventually turned back into recyclable metals. All

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storage and depollution will take place on an impermeable surface served by a sealed drainage system.

### Storage Areas

Storage and treatment areas will be on impermeable surfaces. The treatment of motor vehicles will only be carried out in the area of site that has the following;

- Area engineered with impervious surfaces to protect the underlying ground and groundwater, plus be provided with spillage collection facilities.
- Areas provided with storage facilities that are appropriate for dismantled spare parts, including impervious storage facilities for spare parts that are contaminated with oil.
- Areas provided with containers that are appropriate for the storage of materials removed from vehicles where separation is required, i.e. batteries;
- Areas provided with suitable storage tanks used for the appropriate storage of any fluid from a waste motor vehicle;
- Areas for the storage of used tyres without excessive stockpiling and minimising any risk of fire.

### Treatment Operation for the Depollution of End-of-Life Vehicles

The treatment/depollution of waste motor vehicles will consist of the following when applicable;

- The removal of batteries
- The removal or neutralisation of all potentially explosive components (including airbags) through deployment.

The removal, collection and storage of operating fluids, which will include;

- The removal of any components identified as containing mercury or asbestos
- Lead weights
- Tyres
- Catalysts
- Oil filters

### 4.4.2 Acceptance and Storage of Lead Acid Batteries

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

### Storage Areas

- All batteries will be stored in a storage area with an impermeable floor under cover.

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- Neutralising materials, liquids or granules will be maintained on site for use in the event of a battery acid spill.
- Staff will be trained on site in spillage management procedures.
- If an acid spill should occur, it will be cleaned up immediately.
- All batteries must be stored upright in acid resistant plastic battery bins.
- All designated battery storage areas/battery storage bins will be clearly labelled.

### 4.4.3 Acceptance and Storage of Tyres

Tyres will be accepted at site as part of end-of-life vehicles. When tyres are received or generated on site and are subsequently stored prior to transfer to a suitably licensed treatment facility the following steps must be taken:

#### Storage Areas

- Tyres will be stored in stable stacked stockpiles or within appropriate containers on site.
- Where necessary tyres will be processed to obtain increased storage capacity. This will be achieved by removal of inner wheel rims.
- Tyres will be stored in a way that prevents fire and in accordance with any approved fire prevention and mitigation plan.

### 4.4.4 Acceptance and Storage of Turnings

Turnings are accepted and generated from site operations with storage of the waste on impermeable surface

#### Storage Areas

- Turnings must be stored in a designated bunded bay or a sealed skip to prevent the fluid from entering drainage channels or watercourse.
- All oil and fuel spillages will be contained and cleaned up immediately.
- Remove all wood, paper, rags etc. Prior to stock piling for prevention of fuel sources for fire.
- Turning oil is classified as hazardous waste and should be disposed of correctly by a licensed disposer.

## 4.5 Control of Potentially Polluting Leaks and Spillages

### 4.5.1 Liquid Storage

Liquids, such as fuels, shall be stored on site in accordance with 3.1.3.

### 4.5.2 Procedures for control and remediation of leaks and spillages

Any minor spillage will be cleaned up utilising absorbent materials maintained on site.

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Where a potentially polluting spillage has occurred, immediate action will be taken to prevent the entering surface water drains, watercourse or contaminating any unsurfaced ground.

The spillage shall be cleaned up immediately using absorbent materials and placed in sealed containers.

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

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

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

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

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

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

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

### 4.5.3 Equipment and materials for cleaning up leaks and spillages

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

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### 4.5.4 Wastes Containing Liquids

The site does not accept tanks or drums unless it has been confirmed that these have been purged of their contents. Any unpermitted waste is immediately quarantined.

### 4.6 Specified Waste Treatment Processes – Plant, Equipment and Procedures

#### 4.6.1 Metal Shearing

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

Safe Working Procedures have been developed for each individual process involved in the shear operation. These procedures must be always followed when operating the shear.

Inspection of the shear shall form part of the regular SHE (safety, health and environment) inspection regime. If there are any defects of the shear or it is not operational or not performing correctly, then the shear must be shut down and reported to the site manager immediately.

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

A regular maintenance schedule shall be implemented for the shear.

Only authorised trained personnel shall operate and perform repairs to or maintenance of the shear and safe working procedures (SWPs) to be always followed.

#### 4.6.2 WEEE (Waste electrical and electronic equipment) Waste

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

Group A – large domestic appliances (LDA) (washing machines, tumble driers, dishwashers etc) excluding fridges and freezers

Group B – fridges and freezers

Group C – Cathode Ray Tubes (TVs and monitors)

Group D – fluorescent tubes

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

- Only group A loads can be accepted into the site (consisting of partially or entirely of Group A WEEE waste)
- Group B waste shall be redirected to designated fridge processing plant and rejected from site
- Groups C and D shall be rejected at the weighbridge. Although it is accepted that small amounts of group E may be present in ordinary loads.

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- Group E is accepted at the site under S2 exemption and is accepted as hazardous waste
- Any loads which the weighbridge operator is unsure of will be moved off the weighbridge to be inspected by the Depot Manager.

### Items that fall into Group A

1. Loads will be inspected to ensure that the load consists only of items that fall under the group A category
2. Loads will be graded and accepted as a light iron grade as appropriate.
3. The material can only be stored prior to reprocessing elsewhere. The material cannot be sheared under the terms of the waste exemption

### Items that fall into Group B

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

### Items that fall into Group C and D

1. The load will be inspected to ensure that there are no items in the load consisting of Group C and D items
2. Entire loads of these materials will be rejected at the weighbridge and those identified on site within loads will be quarantined for removal off site

### Items that fall into Group E

1. Loads will be inspected to ensure that the load consists only of items that fall under the group E category
2. Group E material is classified as hazardous waste and can only be accepted with a hazardous waste consignment note.
3. No WEEE may be treated through the shear. The only operation permitted for WEEE is storage prior to recycling elsewhere

## SECTION 5 - Pollution Control, Monitoring and Reporting

### 5.1 Emissions Monitoring

The general handling of waste material and processed metals on the site is not considered to give rise to emissions of specific gases, vapours or aerosols at such levels or concentrations that there is a measurable risk of pollution of the environment or human health outside of the site boundary. However, dust may be generated from general site activities, and the appropriate procedures and dust suppression must be used to mitigate against emissions of dust.

If a potential environmental issue is identified linked to emissions of specific gases, vapours or aerosols at such levels or concentrations that could pose a risk of pollution of the environment or

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human health outside of the site boundary then appropriate steps will be taken by EMR to monitor these emissions and formulate the appropriate actions.

### 5.2 Groundwater and land monitoring and assessments

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

### 5.3 Emissions to Water: Surface water monitoring and reporting

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

The site manager undertakes regular checks of the site's surfaces to ensure that they are maintained in good condition and repairs across the site are anticipated and planned for within the budgetary cycle. Damaged and worn site surfaces are repaired as soon as practicable and operations moved to alternative areas of the site.

To demonstrate a good surface water management system, monitoring will be performed by sampling water and analyses performed of samples against agreed parameters (conducted in MCERTS, UKAS accredited laboratories) and the permitted discharge consent limits.

### 5.4 Monitoring of Meteorological Conditions

The site will maintain basic weather data and ongoing records of events. Meteorological and weather conditions will be monitored based on visual observation but also monitoring of weather reports which can be obtained from a number of sources (e.g. Met Office website) and will be relied upon to give an indication of pending storm events, or other events, wind direction etc. that may affect the site's operation.

Weather conditions (temperature, wind speed & direction) will be reported daily in the site diary. Records of any meteorological conditions that may adversely affect the site's operation or neighbouring properties will be recorded and maintained.

### 5.5 Emergency Plan

An Emergency Plan has been implemented at the site (a separate document) and an emergency drill will be conducted at the site at once a quarter. The plan includes fire, major spillage, pollution incidents, extreme weather, receipt of highly dangerous waste (e.g. asbestos, munitions) etc. The depot manager and key staff will make themselves familiar with the document and this document will be placed in a prominent place (noticeboard etc.).

#### 5.5.1 Climate Change

A climate change risk assessment has been developed for the site. It will be reviewed annually.

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In the case of extreme weather causing the site to close, waste can be diverted to another neighbouring EMR Depot.

| Waste Type | Neighbouring EMR Depot |
|------------|------------------------|
| All waste  | EMR Nottingham         |
| All waste  | EMR Alfreton           |
| All waste  | EMR Sheffield          |

### 5.6 Notifications

Any site activities or operations that give rise to an incident or an accident which significantly affect or may significantly affect the environment (e.g. a fire or major pollution event) will be reported to the Environment Agency on the EA Emergency line and an incident reference number obtained.

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

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

Information and details of the incident will be recorded on a Schedule 5 notification form (attached to the permit), with Part A initially being filled out within 24 hours of the incident, followed by Part B detailing any investigation, mitigation measures and actions taken, as soon as practicable.

All environmental incidents & permit breaches will be recorded on the Event log.

## SECTION 6 – Amenity Management and Control

### 6.1 Control of mud and debris

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

The access road to the site will be visually inspected on a daily basis and twice daily during inclement weather. In the event that mud or debris is observed which is likely to have arisen from the site, action will be taken as soon as possible to resolve this issue. The site will either maintain its own sweeping equipment or use an appropriate contractor available at short notice to remove

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mud and debris. Any abnormal event outside of day-to-day operations where the attendance of sweeping contractor is required, such as a specific load brought to site which has caused mud and debris, will be recorded in the site diary.

### 6.2 Fires on Site

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

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

- In the event of a fire that cannot be extinguished safely with on-site equipment, the Fire Brigade will be contacted by dialing 999.
- The site manager will evacuate all staff and visitors from potentially hazardous areas and direct them to the nominated fire assembly point and ensure all relevant personnel are present.
- The penstock valves will be shut, interceptor pumps turned off (where relevant).
- The staff at the weighbridge will be informed for the purposes of directing emergency service vehicles.
- The following EMR personnel will be contacted to notify them of the situation:
  - Area Manager
  - SHE Specialist
- Once the fire is under control, the Environment Agency will also be notified by either their main number within office hours or via the Environment Agency Emergency No. 0800 80 70 60. An incident reference will be requested from the EA for future reference.

All fire incidents are recorded in the event log and are subject to an internal investigation.

#### 6.2.1 Fire Prevention Plan (FPP)

An FPP implemented for the site and will contain a description of the appropriate measures to prevent fires on site and minimize the risk of any pollution from fires.

### 6.3 Control of Dusts, Fibres and Particulates

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

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

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### 6.4 Control of odours

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

### 6.5 Control and Monitoring of Environmental Noise/Vibration

The company will take appropriate steps at all stages of waste handling from acceptance, to processing to final export to minimise the risk of noise through its acceptance criteria procedures.

Operating and waste acceptance hours are restricted in accordance with section 1.3 of the EMP which will also restrict the times at which noise will be generated on site.

Any noise complaints received will be recorded and investigated, with results being retained in the companies' central environmental files or the sites Environmental Files and / or the site diary.

### 6.6 Control of Waste (for further treatment or landfill)

For waste destined for recycling or disposal at third party sites, only approved contractors will be used, and the appropriate Duty of Care documentation will be completed on transfer of the waste to a permitted facility.

Where required wastes produced on site) will undergo waste acceptance criteria testing before onward movement to designated, permitted and approved site.

### 6.7 Control of Pest Infestations

If pests or vermin are discovered on site that are assessed to be posing a threat to the environment, safety or amenity then a specialist pest control contractor shall be appointed as soon as possible. The attendance of the contractor will be recorded in the site diary.

### 6.8 Control of litter

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

## SECTION 7 - Site Records

### 7.1 Security and availability of records

EMR will maintain site records at the locations specified in section 7.2, Table 4.

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

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### 7.2 Records of waste movements

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

Table 4 Retention and availability of records

| Records                                                                                                                           | Location                                                                                 | Retention Time Period                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| Weighbridge tickets                                                                                                               | On site                                                                                  | 2 years                                                                                                                                   |
| Incoming hazardous waste consignment notes                                                                                        | On site                                                                                  | 3 years                                                                                                                                   |
| Outgoing consignment notes and transfer notes from servicing contractors removing contaminated liquids, absorbents and waste oils | On site                                                                                  | 3 years                                                                                                                                   |
| Electronic Records                                                                                                                | Head Office (Warrington) Server – with national access for any authorised site and user. | Electronic records commenced in 1999 long term retention time scales are yet to be established (anticipated to be a minimum of 10 years). |
| Records required by Permit                                                                                                        | Central database / site                                                                  | 6 years                                                                                                                                   |
| Off-site environmental effects and matters affecting land and groundwater                                                         | Central database / Site                                                                  | Until Permit surrender                                                                                                                    |

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

### 7.3 Site Diary

The site diary will be maintained on site and shall be maintained by the site manager or those operatives which the manager delegates its maintenance to. Other similar documents and information recording systems may also be maintained.

The site diary will be kept until permit surrender.

### 7.4 Periodic Reporting of Environmental Performance

#### 7.4.1 Tonnage Returns

EMR will centrally manage the waste tonnage returns to the Environment Agency detailing its inwards and outwards waste movements by EWC code in an electronic format. Copies of the returns will be retained centrally.

#### 7.4.2 Hazardous Waste Returns

Hazardous waste returns for all hazardous wastes received at the site will be submitted to the Environment Agency by EMR on a quarterly basis by the end of each preceding quarter. EMR will

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centrally manage the reporting of hazardous waste returns quarterly to the Environment Agency via its Waste Returns Team. Hard copies of the quarterly hazardous waste returns will also be retained in either the company's central environmental files and / or the site's environmental files.

### SECTION 8 - Environmental Management System

In order to manage the site's environmental impact, an Environmental Management System (EMS) will be implemented to provide the company with a framework through which its environmental performance can be monitored, improved and controlled. The EMS is supported by an electronic SHE software.

The EMS for the site will comprise of an Environment and Energy policy, the Environmental Management Plan for the site, environmental risk assessments, Environmental Procedures (EPPs), environmental auditing, Emergency Plan, environmental training and environmental reporting.

At EMR Derby, a certified IMS (ISO9001, 14001, 45001 & 50001 standards) will be implemented on site. A certificate will be available upon request.

#### 8.1 Environment and Energy Policy

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

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

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

#### 8.2 Environmental Risk Assessments and Procedures

Planned environmental risk assessments will be conducted at the site to identify significant environmental impacts and risks and these will be translated into procedures as appropriate; environmental protection procedures (EPPs) will be written and appropriate training given to staff in the implementation of these procedures. An Environmental Aspects and Impacts register will be compiled to support ISO14001 EMS requirements.

#### 8.3 Environmental Objectives and Targets

As part of the ISO 14001 EMS / IMS requirements, Objectives and Targets (O&Ts) will be formulated and agreed based on required Environmental Improvements for the site (in addition to Quality and Health & Safety improvements).

##### 8.3.1 Energy Efficiency and Efficient Use of Raw Materials and Water

The site will take appropriate steps to:

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- Take appropriate measures to ensure that energy, water and raw materials are used efficiently in the site activities
- Review and record whether there are suitable opportunities to improve the efficiencies of activities
- Take any further appropriate measures identified by the review.

To this end electricity, water gas, oil, fuels and raw materials will be measured and recorded for the site and a tally recorded and kept to facilitate any review and any efficiencies and savings that can be made.

### 8.3.2 Avoidance, Recovery and Disposal of Wastes

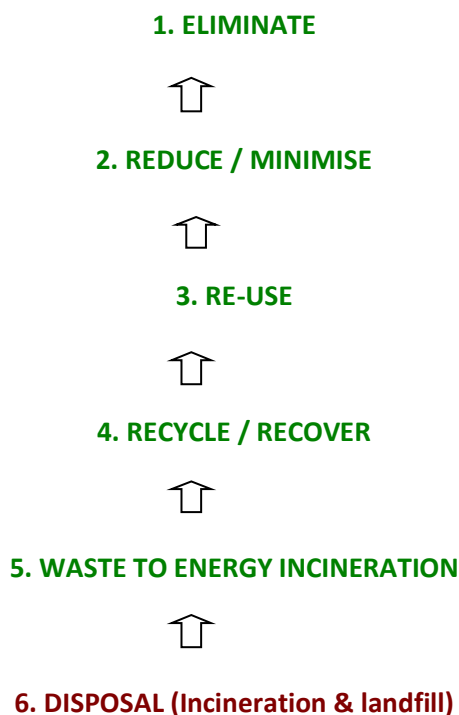
Any waste generated at the site will be treated in accordance with the waste hierarchy referred to in article 4 of the Waste Framework Directive, minimising the impact on the environment. EMR as a company has a business and environmental target of zero waste to landfill.

This will be facilitated at the Derby site by Objectives and Targets produced as part of an ISO14001 Environmental Management System (EMS), which in turn forms part of EMR's wider IMS (Integrated Management System) e.g. the implementation of office waste recycling and recovery.

|                          |            |                 |   |                        |                                         |                         |               |
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### Waste Hierarchy:



### 8.4 Environmental Management Training

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

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

### 8.5 Environmental Auditing

An internal audit programme has been implemented to support the ISO certificate. Sites may also participate in annual (external) surveillance visits conducted by our certification body.

Other checks and inspections will occur on a regular basis and these will be documented on site.

## Appendices

Appendix 1 – Site Plan (including drainage)

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