



EMR Group Ltd.

**Application for Environmental Permit
Non-Technical Summary & Supporting Information**

EMR Derby

Permit no. EPR/TP3493CB

Document Ref : Non-Technical Summary

April 2026

EMR Group Ltd.

Mansfield Road

Derby

Derbyshire

DE21 4AW

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1 INTRODUCTION

1.1 Overview

EMR Group Ltd (EMR) Ltd proposes to operate a ferrous and non-ferrous metal recycling facility at Mansfield Road. The permit number (initial) is EPR/TP3493CB. The proposed activities will comprise the processing (shearing, baling and ELV depollution), segregation and storage of ferrous and non-ferrous metal wastes and the sorting, baling, stripping, cutting, shearing, dismantling, separation, breaking of different grades of the metals and their alloys e.g. light iron, steel, HMS, oversized ferrous metal items (OA), aluminium, copper, brass, lead, zinc and stainless steel. Materials will also include plastic insulated copper cables (which will include potentially POPs containing plastics).

It is proposed that the site will become an ATF (Approved Treatment Facility) to accept End of Life Vehicles (ELVs) for treatment to include full depollution and material recycling, with depolluted ELV shells processed and sent for onward shredding, mechanical separation and metal recycling at an EMR fragmentiser site.

It is also proposed that the site accepts lead acid battery wastes (either individual batteries or in bulk), Catalytic Convertors (CATs) and WEEE wastes (Waste Electrical and Electronic Equipment- both small mixed WEEE and LDA) from both trade customers and householders. These wastes will be sorted, segregated and stored in suitable container and bins prior to transfer to an approved and permitted treatment and recycling facilities. No treatment of batteries, Catalytic Convertors or WEEE is proposed take place at the site and these items will be bulked and stored only for dispatch (as hazardous wastes) to suitably permitted and approved treatment facilities.

In addition to the above, due to the recent regulatory focus on the composition of cables, both from WEEE (Waste Electrical and Electronic Equipment) and non-WEEE sources, and their potential to contain Persistent Organic Pollutants (POPs) and other hazardous substances, EMR has applied for a bespoke permit so as to also enable the acceptance, sorting, segregating and storage of hazardous (potentially POPs containing) plastic insulated copper cables prior to transfer to a permitted treatment site.

The only **point source emission** on site is (and will only be) the surface water discharge of rainwater runoff over impermeable concrete surface, falling to drains and discharged to sewer (via an interceptor to the outfall), regulated and consented by Severn Trent Water. There are no point source emissions to air or land.

1.2 Scope of Document

This Non-Technical Summary (NTS) provides supporting information relevant to the application for a permit at the EMR Derby facility. The NTS includes a description of the proposed details of the proposed operations. The documented proposals are based on the information available to date but may be subject to change as the processes are developed

and trialled. Any changes to the proposals, or additional information which become available, will be provided to the Environment Agency during the application process.

The following documents have been used to ensure that the proposed changes to the operations meet the appropriate standards:

- Environment Agency 'Guidance for waste operators and exporters on classifying some waste electrical and electronic equipment (WEEE) devices, components, and wastes from their treatment' (<https://www.gov.uk/guidance/classify-some-waste-electrical-devices-components-and-wastes-from-their-treatment>)
- Identify and dispose of waste containing persistent organic pollutants – GOV.UK (www.gov.uk)
- Storing persistent organic pollutants (POPs)– GOV.UK (www.gov.uk)
- Classify some waste electrical devices, components and wastes from their treatment – GOV.UK (www.gov.uk).
- Regulation (EU) 2019/1021 on persistent organic pollutants

2 NON-TECHNICAL SUMMARY OF ACCEPTANCE AND STORAGE NON- HAZARDOUS WASTES AND HAZARDOUS WASTE CABLES

2.1 List of Waste (LoW) Coding

Non-hazardous wastes (ferrous and non-ferrous metals).

The processes on site mainly comprise the waste acceptance, processing (shearing and baling), segregation and storage of ferrous and non-ferrous metal wastes by sorting, baling, stripping, cutting, shearing, dismantling, separation, breaking methods as outlined in 1.1. These processes currently take place as with a but is proposed that these waste operations will be performed under a bespoke permit as per the permit application.

The proposed wastes to be accepted into site are as described in Table 1 below:

Table 1. Wastes and LoW Codes for wastes that permitted for acceptance onto the Derby (Mansfield Road) site

Chapter From List of Waste that codes have been selected	Sub-section	Code
02 – WASTES FROM AGRICULTURE, HORTICULTURE, AQUICULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING	None	02 01 10 waste metal
10 – WASTES FROM THERMAL PROCESSES	10 02 Wastes from the iron and steel industry	10 02 10 Mill Scales (ferrous and non-ferrous)
	10 03 wastes from aluminium thermal metallurgy	10 03 02 anode scraps
	10 08 wastes from other non-ferrous thermal metallurgy	10 08 14 anode scrap
11 – WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO-METALLURGY	11 05 wastes from hot galvanising processes	11 05 01 hard zinc
12 – WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS	12 01 wastes from shaping and physical and mechanical surface treatment of metals and plastics	12 01 01 ferrous metal filings and turnings 12 01 03 non-ferrous metal filings and turnings 12 01 13 welding wastes
15 WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED	15 01 packaging (including separately collected municipal packaging waste)	15 01 04 metallic packaging 15 01 05 Composite packaging
16 END OF LIFE VEHICLES (ELVs)	16 01 end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)	16 01 end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
	16 01 03 end-of-life tyres	16 01 03 end-of-life tyres
	16 01 04 end-of-life vehicles*	16 01 04 end-of-life vehicles*
	16 01 06 end-of-life vehicles, containing neither	16 01 06 end-of-life vehicles, containing neither liquids nor other hazardous components

	liquids nor other hazardous components	
16 WASTES NOT OTHERWISE SPECIFIED IN THE LISTS	16 01 Non-ferrous metal	16 01 18 non-ferrous metals
	16 01 Catalytic convertors	16 01 21* hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14
		16 01 22 components not otherwise specified.
	16 02 wastes from electrical and electronic equipment	16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15.
		16 01 17 ferrous metals
	16 06 batteries and accumulators	16 06 01* lead batteries (A)
		16 06 02* Ni-Cd batteries
		16 06 04 alkaline batteries (except 16 06 03)
	16 06 batteries and accumulators	16 06 05 other batteries and accumulators
		16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15* hazardous components removed from discarded equipment (A)
17 CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	17 04 metals (including their alloys)	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 cables other than those mentioned in 17 04 10
19 WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTEWATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	19 01 wastes from incineration or pyrolysis of waste	19 01 02 ferrous materials removed from bottom ash
	19 10 wastes from shredding of metal-containing wastes	19 10 01 iron and steel waste
		19 10 02 non-ferrous
		19 10 06 other fractions other than those mentioned in 19 10 05
	19 12 wastes from the mechanical treatment of waste (for example sorting, crushing, compacting,	19 12 02 ferrous metal
		19 12 03 non-ferrous metal
		19 12 04 plastic and rubber

	pelletising) not otherwise specified	19 12 11* other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances 19 12 12 other wastes (including mixtures of materials) from mechanical treatment of waste other than those mentioned in 19 12 11
20 MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	20 01 separately collected fractions (except 15 01)	20 01 35* discarded electrical and electronic equipment (hazardous small mixed WEEE) 20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23, and 20 01 35 (LDA) 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 40 metals

2.2 Waste Acceptance Procedures

On arrival at the EMR Derby site all metal, ELV, WEEE, battery and cable loads will be weighed in on the weighbridge and pass through radiation detectors. All loads are inspected and checked against the waste description as shown on the accompanying 'duty of care' Waste Transfer Note (WTN) or Hazardous Waste Consignment note as part of waste acceptance procedures (see full index of Environmental Protection Procedures or EPPs in Appendix 1 of the Environmental Management Plan). The details of the wastes and the weights will be recorded on the electronic weighbridge data management system.

2.3 Treatment and processing of metals

In addition to sorting, segregation and bulking of metals, the main (large scale physical) treatment of ferrous and non-ferrous metals at the site will comprise the shearing and / or baling of metals in a shear and baler; following treatment the material which will be stored and bulked for export to a dock facility.

Treatment will also comprise the depollution of End-of-Life Vehicles (ELVs) in a requisite depollution shed equipped with depollution rigs and associated liquid tank farm in accordance with the ELV Regulations and other regulations (e.g. DSEAR).

2.4 Storage of Hazardous cables

Segregated hazardous and non-hazardous POPs cable will be stored in separate, appropriately labelled bays within the main non-ferrous building as shown in the EMR Derby (Mansfield Rd) Site Plan prior to bulking and transfer to a permitted granulating site.

2.5 LoW codes for Wastes (including POPs plastic covered cables)

The following wastes, listed by List of Waste (LoW) code, will be received for POPs plastic covered cables:

16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 02	wastes from electrical and electronic equipment
16 02 15*	hazardous components removed from discarded equipment
17	CONSTRUCTION AND DEMOLITION WASTES...
17 04	metals (including their alloys)
17 04 10*	cables containing oil, coal tar and other hazardous substances
19	WASTES FROM WASTE MANAGEMENT FACILITIES...
19 12	wastes from the mechanical treatment of waste....
19 12 11*	other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances

2.6 Activities (including WFD Annex I and II Operation Codes)

The ferrous and non-ferrous metals will be submitted to the following activities:

Sorting, separation, screening, grading or cutting of wastes into different components for recovery.

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

R3: Recycling / reclamation of organic substances which are not used as solvents

R4: Recycling/ reclamation of metals and metal compounds

R5: Recycling / reclamation of other inorganic materials

2.7 Size of Operations

The total quantity of metal wastes (ferrous and non-ferrous metals) that will be accepted at a site will be less than 75,000 tonnes a year.

There will be no treatment of WEEE at the site (storage only) and there will also be no treatment of WEEE containing ozone-depleting substances, but it will be accepted for storage only.

The storage of WEEE will meet the technical requirements of the WEEE Directive (2012/19/EU). Treatment of WEEE must be carried out using Best Available Treatment, Recovery and Recycling Techniques (BATRRRT). Guidance on BATRRRT is provided in the document "Guidance on Best Available Treatment, Recovery and Recycling Techniques (BATRRRT) and treatment of Waste Electrical and Electronic Equipment (WEEE)" published

jointly by the Department for Environment, Food and Rural Affairs, the Welsh Assembly Government and the Scottish Executive.

No WEEE treatment will be carried out at the site. The maximum storage limit for hazardous cable will be <50 tonnes on site at any one time.

The total quantity of ELVs that will be accepted for depollution, storage and dispatch at the site will be less than 5,000 tonnes a year.

3 ADDITIONAL APPLICATION DOCUMENTS

3.1 Risk Assessment and Fire Prevention Plan

An environmental risk assessment (reference EMR Derby Aspects and Impacts) and Fire Prevention Plan (FPP) (ref: EMR Derby FPP) Fire Prevention Plan (FPP) for ferrous and non-ferrous metal and hazardous storage and processing has been provided and submitted as part of this permit application.

The EMR Derby Aspects & Impacts assessment outlines the main Environmental risks and associated controls to be implemented in accordance with permit requirements. The Fire Prevention Plan (FPP) outlines the fire prevention and fire fighting capabilities of the site, in accordance with the Environment Agency's FPP Guidance.

3.2 Site Plan

An updated site plan has been provided separately and in addition, as part of the Environmental Management Plan. The plan also shows the relevant environmental protection measures. The storage locations have been marked on based on current understanding; however, their exact location may be subject to change.

3.3 Management System Summary

A copy of the Environmental Management Plan (or EMS) (ref. EMR Derby EMP) has been submitted with the application – in relation to the acceptance, storage and treatment of metal wastes, and ELVs and the waste acceptance and storage only of Batteries, WEEE wastes and Catalytic Convertors.

3.4 Proof of Operator Competence

A copy of the WAMITAB certificates (ref. Wamitab TCM Cert: Daniel Elsdon) for the proposed provider of operator competence (TCM) have been provided with the application.