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Project No: 313306

Non-Technical Summary

Prepared for:

2ZLF Ltd

West Meadows Industrial Estate
Derby
DE21 6HA

Contents Amendment Record

This report has been issued and amended as follows:

Revision	Description	Date	Signed
1.0	Final	June 2023	Graeme Kennett

Acknowledgement

This report has been prepared for the sole and exclusive use of 2ZLF Ltd in accordance with the scope of work presented in Mabbett & Associates Ltd (Mabbett) Additional Services Letter Agreement (313306/ASL/GK), dated 17 May 2023. This report is based on information and data collected by Mabbett. Should any of the information be incorrect, incomplete or subject to change, Mabbett may wish to revise the report accordingly.

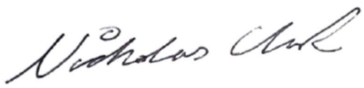
This report has been prepared by the following Mabbett personnel:

MABBETT & ASSOCIATES LTD

Graeme Kennett BSc (Hons)., MSc., MBPR (Fert)
Principal Environmental Consultant

This report has been reviewed and approved by the following Mabbett personnel:

MABBETT & ASSOCIATES LTD



Nicholas Clark, MEng, AMIChemE
Environmental Engineer

Executive Summary

This Non-Technical Summary (NTS) explains the application, in non-technical language as much as possible, avoiding technical terms, detailed data and scientific discussion.

It includes a summary of the activity and a summary of the key technical standards and control measures arising from the risk assessment.

The Environment Agency (EA) permit application forms require a non-technical summary to be submitted in support of any variation to an environmental permit, and includes the following:

- an explanation of exactly what is being applied for.
- a summary of the regulated facility; and
- a summary of the key technical standards and control measures arising from the risk assessment.

This Non-Technical Summary should be read in conjunction with the rest of this application which also contains:

- Application Forms A, C2, C3, & F1
- Supporting Information
- Operating Techniques Document
- BAT assessment
- Environmental Risk Assessment.

2ZLF LTD are not making a claim for commercial confidentiality for any part of this variation application.

Table of Contents

Section 1.0: Introduction

The operation will change from a waste 'facility' to a waste 'installation' due to a proposed increase in the storage and throughput capacities of hazardous wastes at the site above the relevant thresholds.

Non-hazardous waste treatment and storage will remain as allowed under the current permit.

Hazardous waste storage will increase to 150t, from 50t, and throughput will exceed 10t/day to a maximum 100t/day.

SECTION 5.3 Disposal or recovery of hazardous waste
Part A(1)
(a)Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—
(ii)physico-chemical treatment;

SECTION 5.6 Temporary or underground storage of hazardous waste
Part A(1)
(a)Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section, except—
(i)temporary storage, pending collection, on the site where the waste is generated, or
(ii)activities falling within Section 5.2.

As required of the relevant application forms the Best Available Techniques (BAT) assessment is included. The site currently operates under an Environmental Permit [EPR/AB3904UQ] [WML400948], issued by the Environment Agency in 2015, that allows it to accept wastes as described in the permit. There is no proposal to add any wastes to those currently accepted.

The Permit has subsequently been varied to include additional EWC codes and extend the site boundary [EPR/AB3904UQ/V004].

The operation is currently permitted as an A16 Physical Treatment Facility which is *permitted to receive and treat wet and de-watered street sweepings and gully wastes and trommel fines to recover and recycle aggregates and other materials.*

The purpose of this variation application is to increase the volume of hazardous wastes stored and subsequently treated for further recovery and disposal where required.

There are no amendments to;

- EWC codes accepted, (please note there are some amendments to descriptions)

Commented [NC|M1]: You say above additional EWCs are included.

- Overall tonnage accepted at the site
- Site boundary

Commented [NC|M2]: Thought this increases from 50t to 150 t

Section 2.0: Site setting

WEST MEADOWS WASTE RECOVERY FACILITY

Downing Road

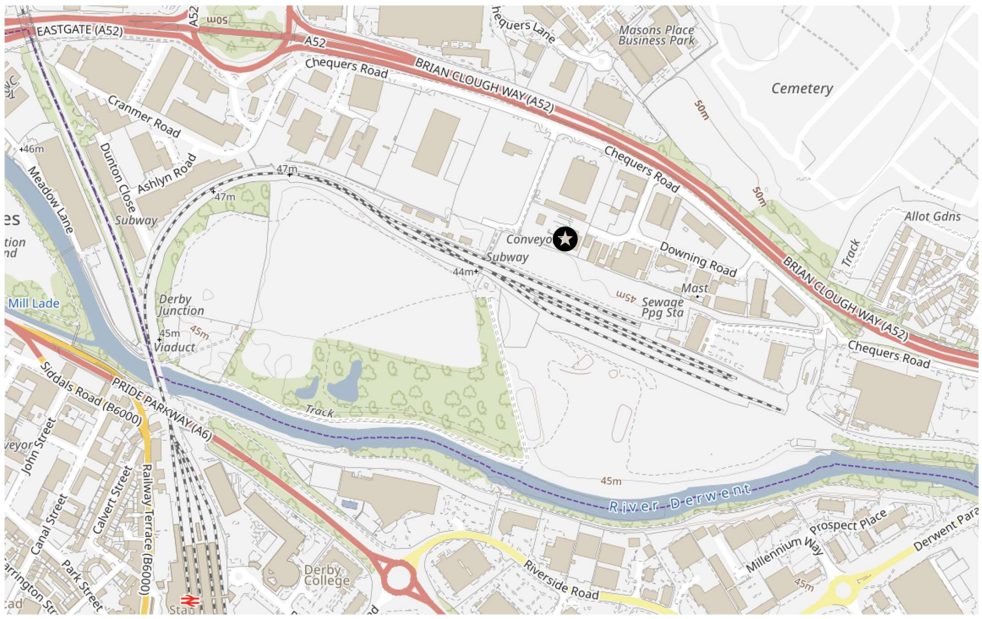
West Meadows Industrial Estate

Derby

DE21 6HA

2.1 Site location

Figure 2-1 Site location



2.2 Site setting

The site is located at the end of Downing Road on the West Meadows Industrial Estate, to the east of the centre of Derby (SK 36815 36166). The estate itself is accessed via the A52 (Brian Clough Way) dual carriageway. The site is accessed via a security gate, from the public highway and is situated within land owned by the operator. The site area is approximately 0.6 hectares and is surrounded by 2.1m high palisade fencing.

There is a mix of retail, industrial, transport, leisure, recreational and domestic properties within 1,000m of the site.

The Sanctuary LNR (a bird and wildlife reserve, formerly a gas works tip containing contaminated land) is located approximately 1,020m to the south-east of the site.

The site is 360m from the River Derwent, which lies to the South and flows W-E.

There is a SPZ1, 2 and 3 (centred at SK 36117 35788) located approximately 725m SSW of the site.

Section 3.0: Site Operations

The site is a 105m x 60m flat area which incorporates a small car park, weighbridge, steel portal building (31m x 24m x 7m eaves height) with an attached flat roofed office (15m x 6m). The area over the weighbridge consists of designated waste reception and storage areas for the non-hazardous and (limited) hazardous waste activities as well as some of the processing plant. The storage for dry wastes and products is bays formed with concrete A blocks or concrete Lego blocks. The process equipment is partly outside but mostly inside the steel portal building.

The process involves 2 inlets – one for wet waste and one for dry waste.

The wet waste side of the process is the area which has been improved in readiness for treatment of the higher proportion of hazardous waste.

3.1.1 Dry waste

The dry waste is loaded into a hopper feeder using a front loader. The material passes under a magnet (for removal of metal) and then onto a star screen which ejects the oversize material (>100mm). The material then passes up a conveyor belt (under another magnet) and then enters the building.

The material drops into a log-washer where heavy material is augured up through a bath of water depositing on a screen where this stone and sand is graded into different sizes and deposited down a chute (+40mm) or onto a conveyor which takes the aggregate out of the building onto a stockpile. The floating light material (organics and trash) floats off the end of the water bath and is dewatered on a vibrating screen before exiting the building again on a conveyor.

The sand and water mix is pumped to the sand plant where it is pumped through a hydrocyclone with the underflow containing the sand deposited on a dewatering screen, then a conveyor, which takes the sand out of the building into a stockpile. The water and fines pass on to the thickener. Flocculant is added to the water to bring the fine solids together allowing settlement in the thickener before the sludge is removed via pump to the centrifuge system (also indoors).

3.1.2 Wet waste

Outside of the building the wet waste from the wet waste discharge bay is loaded into the plant using a material handler into a screw conveyor. This is to be improved in future by the installation of a submersible pump that will feed the hopper directly from the storage tank. Due to the nature of the submersible pump, there will be a reduction in noise associated with this activity as the loader will not be needed to perform this operation.

The screw conveyor moves the material onto a primary screen where the material is washed with larger material removed for disposal. The underflow is pumped to the sand scrubber skid. On this skid the sand

is scrubbed with pressured water and then separated using a hydrocyclone and an up-flow classifier. The sand is removed via a screw. The water and fines pass to a lamella settlement unit where sludge is removed. A scraper also removes any scum/oil residue from the surface into an IBC. The sludge is currently held until the centrifuge is available.

As part of the permitted activity all water from the wet waste bay side of the plant is hard piped such that it has to go through the water treatment plant in the building consisting of Dissolved Air Flotation (DAF) and electrocoagulation. This removes suspended solids, oil and heavy metals. When the wet feed of the process is not being used the water treatment plant can clean the process water from the dry feed recycling.

3.1.3 New equipment

The new equipment for the expansion of the hazardous treatment operation is:

- Sand scrubber skid replacing old screw classifier, up-flow classifier and vibrating screen.
- New pressure pump and scrubber (on original permit but not installed).
- Larger, new lamella (separator) replacing old rental Siltbuster lamella with flocculator and settlement chemicals.
- 30m^3 Storage Tank.

The system uses the same centrifuge and water treatment plant in the building as the rest of the plant. This new equipment is located along the southern wall of the wet waste bay which was where the previous dewatering plant was located.

The restrictions on the plant which currently stops the plant from processing more than 10 t/day are:

- Up-flow Classifier in place but not commissioned (no motors or noise will be associated with this equipment.
- Storage tank not connected (has 2 mixer motors which were running for the noise test).

Figure 3-1 Wet waste unloading bay

Section 4.0: Operating Techniques

4.1 Background

The installation will continue to accept, treat and transfer a range of hazardous and non-hazardous waste streams. Hazardous materials accepted are generally at the lower end of the hazardous waste threshold, i.e., for PAH and PTE content.

The relevant Technical Standards for this operation are:

- Waste Treatment BREF BAT-Conclusions (EUR-Lex - 32018D1147 - EN - EUR-Lex (europa.eu) [S5.3 and S5.6 activities][1]
- The hazardous waste storage and treatment and the requirements of 'Chemical waste: appropriate measures for permitted facilities'[2].

The sites infrastructure has been developed from the outset so that the site is capable of handling and treating a range of non-hazardous and hazardous waste streams.

Waste management activities include physico-chemical treatment off-site, bulking of the recovered materials and the storage of waste and waste materials prior to despatch are undertaken at the site.

The site is operated in accordance with an Environmental Management System which is accredited to ISO 14001:2015, providing written procedures for the management of the facility, including effective maintenance of plant, equipment and site infrastructure. All operations at the site are managed by a Technically Competent Manager [TCM] who ensures that the procedures in the EMS are followed.

4.2 Waste acceptance, control systems and procedures

4.2.1 Acceptance

The site handles a range of hazardous and non-hazardous waste streams. Upon acceptance, a unique code is assigned to the waste to ensure that the waste is always traceable throughout the process.

All waste storage and treatment activities are undertaken in a manner that always ensures environmental protection.

Environmental monitoring and record keeping is currently undertaken and completed in accordance with the conditions included in the environmental permit. These measures will be extended in line with any varied permit requirements.

[1] COMMISSION IMPLEMENTING DECISION (EU) 2018/ 1147 - of 10 August 2018 - establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/ 75/ EU of the European Parliament and of the Council - (notified under document C(2018) 5070) (europa.eu)
[2] Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

Waste pre-acceptance and acceptance procedures employed at the site ensure that only permitted wastes are accepted at the site. These procedures reflect those stated within the Appropriate Measures guidance[3].

i. Vehicles arrive on site follow a pre-booking system to ensure that capacity is available within the operation to safely unload the vehicle.
ii. The site acceptance checks are used as a second phase check to confirm the characteristics of the waste following the pre-acceptance checks already undertaken.
iii. Upon arrival at the facility the vehicle containing the hazardous or non-hazardous waste material is directed to the unloading area.
iv. Checks are then carried out to verify that the paperwork is filled out correctly, the information on the consignment / transfer note agrees with the volumes on the vehicle,
v. The site manager checks each individual entry in section B of the consignment / transfer note to verify all weights/volumes are correct, the site operator also signs section E to complete the transfer note, where the appropriate time and date is also noted.
vi. Once all checks have been carried out and are satisfactory the material is unloaded awaiting processing.

All materials received at the site have been through pre-acceptance checks, identifying the type of industry that the waste originates from, its characteristics and how the site will process it and dispose of any non-recoverable residues.

4.2.1 Control, monitoring and reporting of aerial emissions of dust, fibres and particles

There are no point source emissions to air originating from the waste received on site as it all has a high moisture content, with all processing carried out in the equipment housed in the main processing building. The site is located entirely on an impermeable surface that is regularly maintained to reduce any dust emissions from plant movement.

Recovered materials have an elevated moisture content that minimises any dust issues. The lighter, inert, fractions i.e., those that may be subject to drying out are kept under cover.

Dust or particulate matter will not be generated by any of 2ZLF activities, as inherently dusty material is not handled on site.

4.2.2 Control of odour emissions

The site, or processes undertaken, does not emit any odours that are likely to extend beyond the site boundary.

[3] Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

Any occurrence of odour from the site is entered into the site diary with reasons for the occurrence and the results of an investigation.

Any activity, or waste type, that creates, or has the potential to cause, an odour emission would be re-assessed with a view to eliminating the emission as all processes are continually assessed in the Environmental Aspects and Impacts Assessment as part of the ISO 14001 accreditation.

4.2.3 Storage of waste with hazardous properties

All material is stored and segregated in the dedicated concrete storage bay and/or bulk tank.

The potential problems from wastes are addressed by the materials only accepted on site in line with the waste acceptance procedures and stored in-line with the site segregation policy. This avoids any contact with other materials on site that could react adversely if they come into contact.

All storage areas are visually checked daily and any signs of leakage, or other issues, actioned immediately and reported via the company spillage procedure.

4.2.4 Operating techniques

The site is operated in accordance with the requirements of EA Guidance, and details the following:

- Management;
- site operations;
- emissions and monitoring; and
- information.

Operational management procedures ensure that:

- the risks that the activities pose to the environment are identified.
- the measures that are required to minimise the risks are identified.
- the activities are managed in accordance with the management system and operating techniques document.
- performance against the management system is audited at regular intervals; and
- compliance with the environmental permit.

The risk management and mitigation measures employed at the site and identified in the environmental risk assessment are detailed in the sites operating techniques document.

In summary, the rules and operating procedures employed at the site ensure the following with respect to the specified waste management activities:

- All waste treatment and storage activities take place on an impermeable pavement (concrete) provided with sealed drainage.

- Concrete surfacing falls towards drainage channels ensuring that potentially contaminated runoff is contained on site.
- The dewatering bay has a sump within the building with recycled stone used as a drainage material to allow liquid to pass to the sump with the solid being retained in the bay ready for processing through the plant with the other dry material.
- The contaminated water passes through the gravel bed into a sump from where the water is treated using the electrocoagulation and DAF water treatment plant. Oil is collected from the DAF whilst any sludge is dewatered.
- Strict waste acceptance procedures are adhered to, to ensure only permitted wastes are accepted on site and that the properties of all wastes are understood.
- The site manager ensures that regular inspections are made of the site. If necessary, remedial measures will be arranged as soon as possible.

Section 5.0: Climate Change Risk Assessment

The following possible impacts and mitigation measures were considered when preparing this risk assessment.

5.1 Daily extreme rainfall

Daily rainfall intensity could increase by up to 20% on today's values.

5.1.1 Potential for increased site surface water and flooding.

The mitigation for this is to prepare flood plan with reference to the guidance Preparing for flooding: A guide for sites regulated under EPR and COMAH[4] as shown in Appendix A.

2ZLF has measures in place to ensure that:

- Anticipated surface water and flood waters are managed by the site drainage system and effluent treatment plant which has sufficient storage or treatment capacity. Drainage systems are inspected and maintained.

5.1.2 Potential for increased incidents involving hazardous wastes.

2ZLF has measures in place to ensure that:

- external areas where wastes are handled or stored are provided with contained drainage.
- hazardous wastes are stored in appropriately bunded tanks and bays.

5.2 Average winter rainfall

Average winter rainfall may increase by over 40% on today's averages.

This could lead to increased site surface water and localised site flooding.

The mitigation for this is to prepare flood plan with reference to the guidance Preparing for flooding: A guide for sites regulated under EPR and COMAH as shown in Appendix A.

The plan includes:

- risk assessment of process equipment and services at greatest risk from flooding;
- provision of emergency pumps to remove floodwater and identification of lowest risk location for discharge of floodwaters;
- protection of control and electrical systems; and
- identification and protection of flat bottom tanks at risk of floating in floodwater.

There is potential for increased incidents involving oil-containing wastes.

[4] Preparing for flooding: a guide for regulated sites - GOV.UK (www.gov.uk)

The mitigation for this includes:

- external areas where wastes are handled and/or stored are provided with impermeable surfacing and contained drainage, and that these are maintained in good condition;
- hazardous wastes are stored in appropriately contained tanks and bays.

Section 6.0: Noise

Sound from the operation of the 2ZLF site located on Downing Road, West Meadows Industrial Estate, Derby, has been assessed. The site currently operates between the hours of 06:30 and 17:30, Monday to Saturday.

Baseline sound measurements without the processing plant operating were carried out during daytime and night-time periods at the two locations representative of the closest off-site sensitive receptors to quantify the prevailing sound climate.

Further sound measurements were undertaken at the receptors when the new processing plant was operational. A comparison of the measured noise levels at the receptor locations both with and without the processing plant operating clearly indicates that there is no change in the noise levels experienced.

Sound measurements of activities at the 2ZLF site and the new processing plant when operating were also undertaken to determine the noise emitted by the site. These measured levels were used to predict the noise level incident on each receptor.

The predicted noise level at each receptor are significantly below the measured L_{Aeq} and L_{A90} levels during both daytime and night-time periods. Therefore, this is a good indication that the operation of the 2ZLF site does not cause a noise impact upon the closest receptors.

An assessment of the noise impact from all operations at the 2ZLF site was undertaken using the method given in BS 4142. The rating level above the background level at the receptors, both during daytime and night-time periods result in no noise impact.

As it has been demonstrated that the operation of the 2ZLF site does not result in a noise impact upon the closest noise sensitive receptors, no specific noise mitigation measures are required. However, it is recommended that a Noise Management Plan is followed for the site to reduce any potential noise impacts.

Section 7.0: Flood Mitigation

The site currently operates under an Environmental Permit [EPR/AB3904UQ] [WML400948], issued by the Environment Agency in 2015, that allows it to accept wastes as described within the permit.

The permit allows for the acceptance and treatment of hazardous and non-hazardous waste materials. The proposed variation is to increase the proportion of hazardous interceptor wastes etc., that is accepted and treated. These wastes are hazardous by virtue of their TPH content that are typically below a 1%` threshold.

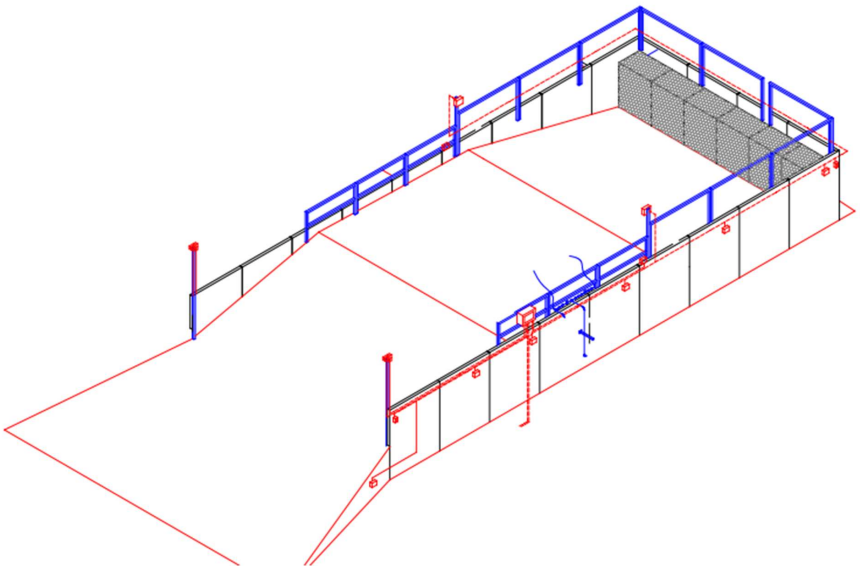
7.1 Liquid wastes

Liquid wastes are discharged at the site in to the bunded tanks. These tanks not only protect from spillages, but also protect their contents from flooding by virtue of their construction. The tanks are round in cross section which means they are less likely to suffer the same sort of disturbance as flat-bottomed tanks.

7.2 Sludgy wastes

Sludgy wastes are discharged in to the specially designed and constructed above ground wet waste bay.

Figure 7-1 Wet waste discharge bay



Where the TPH content is determined to be more than 1%TPH they are reloaded and rejected from site. As the bay is of above ground construction they are protected from flooding at the site.

Section 8.0: Baseline Report

As the facility is being varied to be classed as an *installation*, the originally submitted Site Condition Report (SCR) has been amended to reflect the changes as required by the H5 guidance[5] and updated to a Baseline Report (BR). The trial pit locations and analyses have been included within the BR.

The installation will operate with due regard to the conditions of the environmental permit and all relevant environmental legislation to ensure that land and groundwater is protected during the lifetime of the site and that the land is in a satisfactory state when the permit is eventually surrendered.

The possibility of any significant releases to the ground occurring during the lifetime of the permit is therefore limited.

All wastes are stored and treated on areas of impermeable concrete to eliminate direct potential pathways to soil and groundwater.

Minor spillages, if they occur, are dealt with immediately by trained staff using appropriate spill response procedure and spill kits located around the site.

The impermeable concrete site surfacing will locally break any potential pathway for contaminants that could be emitted from the permitted activities to land or groundwater.

[5] Microsoft Word - H5 SCR guide for applicants v2 0 4 August 2008.doc (publishing.service.gov.uk)

Section 9.0: Proposed changes

The impact of the changes to the 2ZLF permit will have minimal impact on the site and its operation. 2ZLF are not applying for new waste codes on the permit just to treat more of the old codes (mainly 130508). The material which will be treated by 2ZLF is the low hazardous form of 130508 – the site will not be DSEAR rated.

The material acceptance procedure will remain as it is – if there is an odour of fuel or if there is significant oil (more than 1%) then the material will be turned away.

The non-hazardous storage and processing will not be changed

The upgrade to the plant will enable the majority of the material to be treated directly from the tanker – this will reduce odour.

The site is a 105m x 60m flat area which incorporates a small car park, weighbridge, steel portal building (31m x 24m x 7m eaves height) with an attached flat roofed office (15mx 6m). The area over the weighbridge consists of designated waste reception and storage areas for the non-hazardous and (limited) hazardous waste activities as well as some of the processing plant. The storage for dry wastes and products is bays formed with concrete A blocks or concrete Lego blocks.

The process equipment is partly outside but mostly inside. The process involves 2 inlets – one for wet waste and one for dry waste.

The wet waste side of the process is the area which has been improved in readiness for treatment of more hazardous waste.

9.1 Dry waste

The dry waste is loaded into a hopper feeder using a front loader. The material passes under a magnet (for removal of metal) and then onto a star screen which ejects the oversize material (>100mm). The material then passes up a conveyor belt (under another magnet) and then enters the building.

The material drops into a log-washer where heavy material is augured up through a bath of water depositing on a screen where this stone and sand is graded into different sizes and deposited down a chute (+40mm) or onto a conveyor which takes the aggregate out of the building onto a stockpile. The floating light material (organics and trash) floats off the end of the water bath and is dewatered on a vibrating screen before exiting the building again on a conveyor.

The sand and water mix is pumped to the sand plant where it is pumped through a hydrocyclone with the underflow containing the sand deposited on a dewatering screen then a conveyor which takes the sand out of the building into a stockpile. The water & fines pass on to the thickener. Flocculant is added to the water to bring the fine solids together allowing settlement in the thickener before the sludge is removed via pump to the centrifuge system (also indoors).

9.2 Wet waste

Outside of the building the wet waste from the wet waste bay is loaded into the plant using a material handler into a screw conveyor. In future a pumped feed from the storage tank will also be possible – fed by a submersible pump with no noise associated.

The screw conveyor moves the material onto a primary screen where the material is washed with larger material removed for disposal. The underflow is pumped to the sand scrubber skid. On this skid the sand is scrubbed with pressured water and then separated using a hydrocyclone and an up-flow classifier. The sand is removed via a screw. The water and fines pass to a lamella where sludge is removed. A scraper also removes any scum/oil residue from the surface into an IBC. The sludge is currently held until the centrifuge is available.

As part of the permit all water from the wet waste bay side of the plant is hard piped such that it has to go through the water treatment plant in the building consisting of dissolved air flotation and electrocoagulation. This removes suspended solids, oil and heavy metals. When the wet feed of the process is not being used the water treatment plant can clean the process water from the dry feed recycling.

9.3 New equipment

The new equipment for the expansion of the hazardous treatment is:

- Sand scrubber skid replacing old screw classifier, up-flow classifier and vibrating screen.
- New pressure pump and scrubber (on original permit but not installed)
- Larger new lamella (separator) replacing old rental Siltbuster lamella with flocculator and settlement chemicals.
- 30m^3 Storage Tank

The system using the same centrifuge and water treatment plant in the building as the rest of the plant. This new equipment is located along the southern wall of the wet waste bay which was where the previous dewatering plant was located.

The restrictions on the plant which currently stops the plant from processing more than 10 t/day are:

- Up-flow Classifier in place but not commissioned (no motors or noise will be associated with this equipment
- Storage tank not connected (has 2 mixer motors which were running for the noise test.

Section 10.0: Conclusions

The overall conclusion of the studies undertaken in support of this bespoke environmental permit application for a waste storage and treatment installation is that there is unlikely to be a significant environmental impact.

Appendix A: ISO14001:2015 certificate

Certificate of Registration

nqa.

This is to certify that the Environmental Management System of:

2ZLF Ltd

Downing Road, West Meadows Industrial Estate, Derby, DE21 6HA, United Kingdom

applicable to:

Operation of waste treatment and recycling plant

has been assessed and registered by NQA against the provisions of:

ISO 14001:2015

This registration is subject to the company maintaining an environmental management system, to the above standard, which will be monitored by NQA

Managing Director

Certificate No.	118328
ISO Approval Date:	12 November 2019
Reissued:	28 February 2023
Valid Until:	10 November 2025
Prior Cycle Exp Date:	11 November 2022
EAC Code:	24

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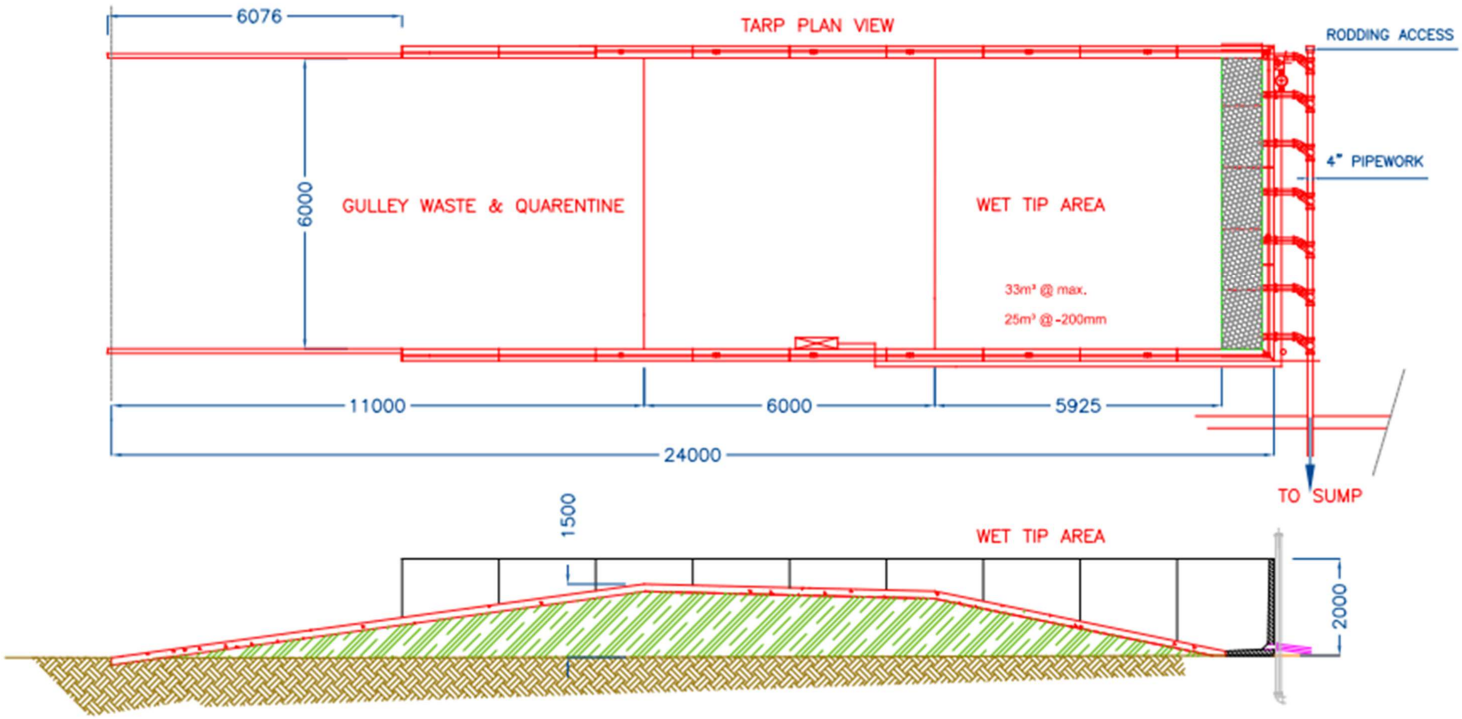
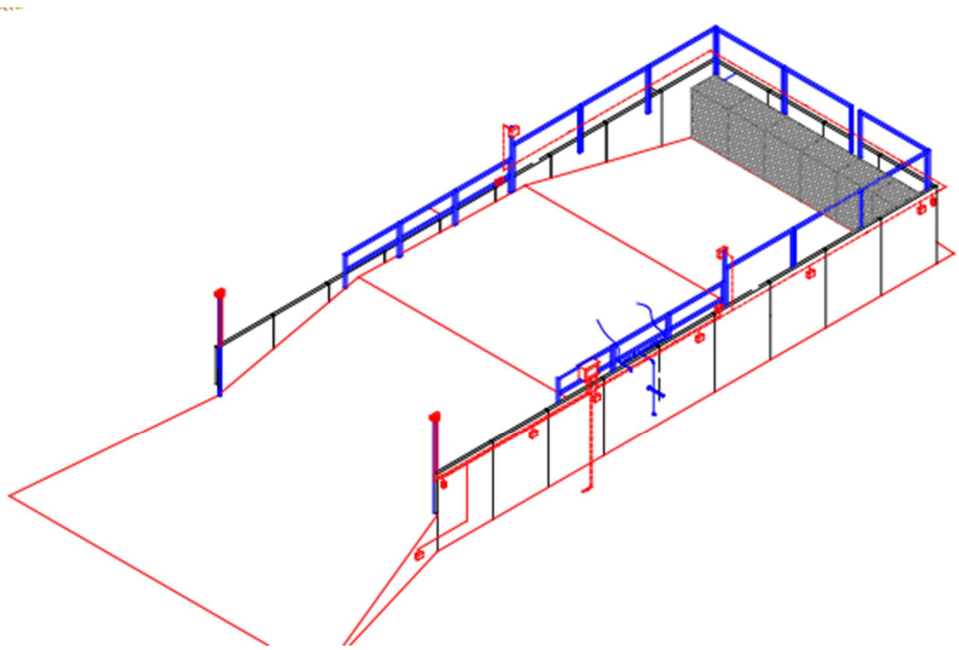
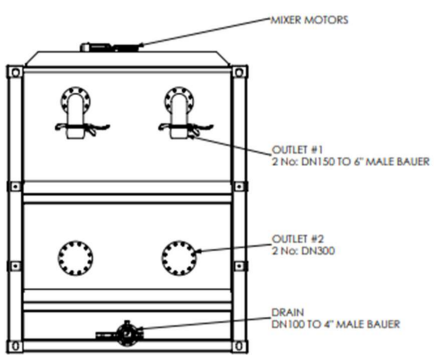
The use of the UKAS Accreditation Mark indicates accreditation in respect of those activities covered by the accreditation certificate number 015 held by NQA. NQA is a trading name of NQA Certification Limited, Registration No. 09351758. Registered Office: Warwick House, Houghton Hall Park, Houghton Regis, Dunstable Bedfordshire LU5 5ZX, United Kingdom. This certificate is the property of NQA and must be returned on request.

Appendix B: Wet waste bay design

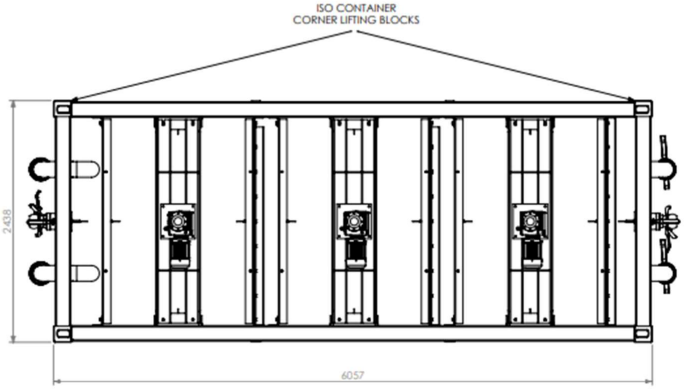




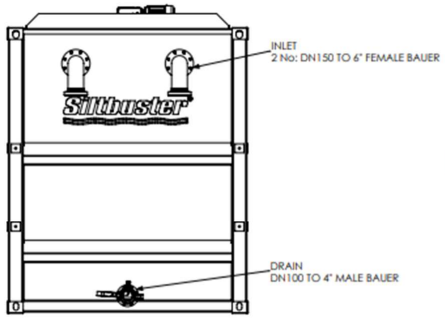
Appendix C: Liquid hazardous waste storage



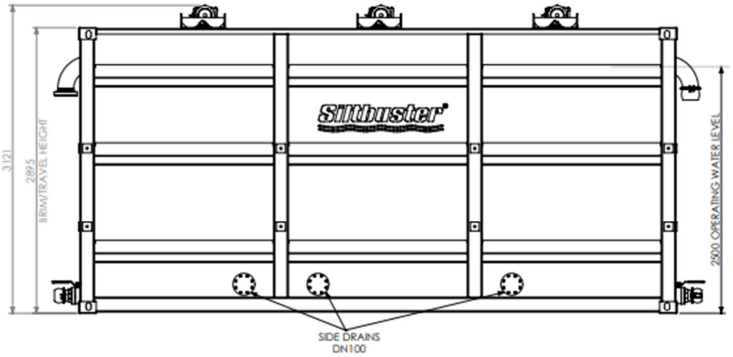
REAR ELEVATION



PLAN ELEVATION



FRONT ELEVATION



SIDE ELEVATION