Non-Technical Summary

SAR Metals Ltd

3 Manby Road

South Killingholme

Immingham

DN40 3DX

Olive Compliance Ltd
Planet House
Northumbrian Way
Killingworth
NE12 6EH
Company Number:12861220

1.0 Introduction

SAR Metals Ltd (SAR) has instructed Olive Compliance Limited (OCL) to prepare an application for a Bespoke Environmental Permit (Installation) for their site located at 3 Manby Road, South Killingholme, Immingham, DN40 3DX.

This non-technical summary provides a summary of the regulated facility, an explanation of exactly what is being applied for, and a summary of the key technical standards and control measures that will be implemented at the site as a result of the application.

1.1 The Site

The site is located at: SAR Metals Ltd, 3 Manby Road, South Killingholme, Immingham, DN40 3DX.

The site location and environmental site setting is shown below.

Image 1 – Site Setting

The site is principally bounded as detailed in Table 1 below.

Table 1 – Site Setting

Direction	Use
North	Road Link
South	Industrial
East	Road Link

West	Rural (Woodland)

2.0 Proposed Installation Activities

At this stage of the application process the site is not fully operational, with low level waste activities undertaken in line with the waste exemption regime, while transferring operations from their existing facility (Exemptions T11, T9 and an S2/S1).

In relation to specific equipment and fixed plant for the treatment of WEEE wastes (shredding), these are not place or currently identified. However, buildings have been assigned where each activity will take place as part of the application process and examples of plant, mitigations and process described.

Limits of activities

Tables 2 – 5 provide a summary of proposed activities.

SAR wish to carry out the recovery of metal wastes and other components in relation to the below waste streams.

- WEEE Recycling
- Metal Recycling receipt of batteries for storage only and cable
- Catalytic Converter Recycling (Non-Hazardous and Hazardous)

Description of activities

A summary of proposed activities is shown in the below tables with corresponding R&D codes.

Table 2 – Catalytic Convertors

Catalytic Converters – 15600 tonnes per annum (Haz) **Catalytic Converters – 3120 tonnes per annum (Non Haz)**			
Activity reference	**Activity listed in Schedule 1 of the EP Regulations**	**Description of specified activity and WFD Annex I and II operations**	**Limits of specified activity and waste types**
AR1 – Catalytic converter recycling	S5.3 A1 (a)(vi)	**R4:** Recycling/reclamation of metals and metal compounds **R5:** Recycling/reclamation of other inorganic materials	From receipt of hazardous waste catalytic converters to treatment consisting of manual sorting, separation and mechanical shearing. Treatment activities shall not exceed 50 tonnes per day. Activities shall take place within a building on an impermeable surface with sealed drainage.

AR2 – Hazardous waste storage	S5.6 A(1)(a)	**R13:** Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **D15:** Storage of hazardous wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	Storage of hazardous catalytic converters, RCF matting and WEEE. Activities shall take within a building on an impermeable surface with sealed drainage. Catalytic converter and RCF matting wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery.
AR3 - DAA	Physical treatment of catalytic converters for the purpose of recycling	**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	Treatment consisting only of sorting, separation, shearing of non-hazardous catalytic converters. Non-hazardous waste types suitable for acceptance are limited to those non-hazardous wastes listed in the permit. Undertaken in relation to activity AR1.
AR4 – DAA	Physical treatment for the purpose of recycling	**R3:** Recycling/ reclamation of organic substances which are not used as solvents **R4:** Recycling/reclamation of metals and metal compounds	Treatment consisting only of milling of non-hazardous cores for the purpose of recycling. Undertaken in relation to activity AR1. Non-hazardous waste types suitable for acceptance are limited to those non-hazardous wastes specified in the permit
Activity reference	**Activity listed in Schedule 1 of the EP Regulations**	**Description of specified activity and WFD Annex I and II operations**	**Limits of specified activity and waste types**
AR5 - DAA	Storage of processed materials, excluding temporary storage of hazardous waste under Section 5.6 A(1)(a)	**R13:** Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	From storage of processed catalytic converter and milled Honeycomb cores Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery. Undertaken in relation to activity AR1.

AR6 - DAA	Bulking non-hazardous waste	**R13:** Recycling/reclamation of other inorganic materials	Bulking of non-hazardous Honeycomb cores milled onsite with imported milled non-hazardous Honeycomb cores. Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery. Undertaken in relation to Activity AR1.
AR7 – Non Hazardous	Treatment and Storage of waste, excluding temporary storage of hazardous waste under Section 5.6 A(1)(a)	**R13:** Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **R4:** Recycling/ reclamation of metals and metal compounds **R5**: Recycling/ reclamation of other inorganic compounds	From receipt of non-hazardous catalytic converters waste to treatment. Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery.

Table 3 – Metal Recycling

Metals – 6250 tonnes per annum	
Metal Recycling **R13**: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **R4:** Recycling/ reclamation of metals and metal compounds **R5**: Recycling/ reclamation of other inorganic compounds	Treatment operations shall be limited to: • Cables – Treatment consisting only of sorting, separation, grading, shearing, shredding, granulation or cutting of non-hazardous waste into different components for recovery. • Batteries – storage only

Table 4 – WEEE

WEEE – Annual Tonnage 78000 tonnes per annum Batteries – 13104 tonnes per annum	

Waste electrical and electronic equipment authorised treatment facility **R13**: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **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 compounds	Treatment operations shall be limited to: • Treatment consisting only of sorting, dismantling, shredding, separation, screening, grading, baling, shearing, compacting, crushing, granulation, repair or refurbishment, or cutting of waste into different components for recovery. There shall be no treatment of WEEE containing ozone depleting substances • No treatment of Waste Batteries Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery Treatment of WEEE shall be carried out within a building or in an area with a weatherproof covering. Buildings, covered areas or containers shall meet the following requirements: • buildings, covered areas, or containers shall be designed, constructed and maintained to prevent ingress of rain and surface water; • rain and uncontaminated surface water shall be kept separate from contaminated water and other liquids; • containers containing waste shall be stored on an impermeable surface with sealed drainage system.

Proposed Daily Throughput

Waste Type	Daily proposed throughput
WEEE	250 tonnes
Metal	10 tonnes
Catalytic Converters (Haz)	50 tonnes
Catalytic Converters (Non - Haz)	10 tonnes
Batteries	42 tonnes

EWC codes

The proposed EWC codes for acceptance are shown in Table 6 – 9 in line with each activity.

Table 6 - Catalytic EWC Codes

Permitted Waste types - Catalytic Converter Recycling **Hazardous -** **Non hazardous -**	
Exclusions	Wastes having any of the following characteristics shall not be accepted: Consisting solely or mainly of dusts, powders or loose fibres
Waste Code	**Description**
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
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 (catalytic converters only)
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 08	**spent catalysts**
16 08 01	spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07) –from catalytic converters only
16 08 02*	spent catalysts containing hazardous transition metals or hazardous transition metal compounds –from catalytic converters only
16 08 03	spent catalysts containing transition metals or transition metal compounds not otherwise specified –from catalytic converters only
16 08 07*	spent catalysts contaminated with hazardous substances –from catalytic converters only

Clarity on EWC codes

16 01 21 Hazardous
Catalytic converters, which contain a honeycomb structure made of ceramic or metal, are classified as hazardous waste if they contain refractory ceramic fiber (RCF) matting.

16 01 22 Non Hazardous
Catalytic converter foil typically refers to converters that use a metallic (foil) core instead of the more common ceramic honeycomb structure.

Foil catalytic converters are made from materials like stainless steel and are designed to contain preci ous metals that help reduce harmful emissions from vehicle exhaust.

Table 8 - Metal Recycling EWC codes

Permitted Waste types	Permitted Waste types
Waste Code	**Description**
17 04 10*	Cables containing oil, coal tar and other hazardous substances
17 04 11	Cables other than those mentioned in 17 04 10
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 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries

Table 9 - WEEE EWC Codes

Permitted Waste types - Waste Electrical and Electronic Equipment authorised treatment facility	
Waste Code	**Description**
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
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 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 discarded equipment
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06	**batteries and accumulators**
16 06 01	Lead batteries

16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
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 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 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

Additional Comment

Our client would like to request that the potential new EWC code 16 06 07 Batteries be included into the proposed EWC in the submission should it comes into use in the UK during the permitting process.

Annual Tonnage

The site wishes to accept a maximum 116,074 tonnes per annum of all waste types with the approximate tonnages shown in the activity tables.

Fees and Charges

Application advice given on July 2025 has listed the below fees and charges are applicable to the activities proposed. Changes have subsequently been made to remove ELV activities.

The original Pre Application advice given in 2024 was incorrect and has been revised for this application.

Table 10 – Fees and Charges

The below table details the fees and charges in relation to the proposed activities as given by PSC in August 2025.

Table 10 – Fees and Charges

Non-Technical	Activity	Activity Section	Charge reference	Charge	Reduction

Summary: Your Reference					
	Catalytic Converter Recycling	S5.3 (a) (v) Hazardous waste installation-recycling and reclamation of inorganic waste			
	Hazardous waste storage	S5.6 (a) (1)(a) Temporary or underground storage of hazardous waste			
	Treatment of non-hazardous Cores)	Waste operation Physical			
	Storage of processed materials, bulking non-hazardous waste and storage of waste.	Directly Associated Activities to AR1			
	WEEE (ATF)	Waste Operation Metal recycling site-mixed metals			

Plans and assessments	Charge reference	Charge
Fire Prevention Plan	1.19.3	1,241
Emissions Management Plan (Dust and fugitive emissions)	1.19.5	1,241
Habitats Assessment	1.19.2	779

Total Fee = £29621.90

3.0 Application Contents

In view of the foregoing, the application comprises the following elements:

1. Application forms
2. Non-Technical Summary (SAR_NTS)
3. Management System (SAR_EMS)
4. Environmental Risk Assessment (SAR_ERA)
5. WAMITAB certification
6. Director Information
7. Fire Prevention Plan (SAR_FPP)
8. Drawings (SAR_DRAWINGS)
9. Pre-Application Advice (SAR)
10. BAT Assessment (SAR_BAT)
11. Site Condition Report (SAR_SCR)
12. Dust and Emissions Plan (SAR_DEMP)
13. Accident and Incident Plan (SAR_AIP)
14. Appropriate Measures Document (SAR_AP_WEEE)
15. Appropriate Measures Document (SAR_AP_NONHAZ)
16. Climate Change Risk Assessment (SAR_CLIMATE)
17. Flood Risk Management (SAR_Flood)
18. Habitats management Plan (SAR_HAB)

3.1 Application Forms

The required Environment Agency's application forms have been completed in support of the application and are enclosed as Section 1 of the application.

3.2 Non-Technical Summary

As part of the application this non-technical summary (NTS) is a concise document that provides a description of the application process should also provide an effective outline of all the key points set out in an Environmental Statement.

The Non-Technical Summary has been included in Section 2 of this application.

3.3 Environmental Management System

SAR have an environmental management system certified against ISO27001,14001, 9001 and 45001.

Certification is included within Section 3 of the application.

The SAR systems cover the EA Guidance Develop a management system: environmental permits - GOV.UK (April 2023).

It covers the key elements required listed below including procedures to ensure compliance with appropriate measures guidance (where applicable).

1. How to develop your management system
2. Prepare your site infrastructure plan
3. Site operations
4. Site and equipment maintenance plan
5. Contingency plans
6. Accident prevention and management plan
7. A changing climate
8. Complaints procedure
9. Managing staff competence and training records
10. Keeping records
11. Review your management system
12. Site closure
13. Make sure people understand what you do

The below procedures are included within the application with a summary of all Environmental Procedures.

SAR_Pre Acceptance and Acceptance Procedure WEEE

SAR_Pre Acceptance and Acceptance Procedure BATTERIES

SAR_Pre Acceptance and Acceptance Procedure CATALYTIC CONVERTORS

SAR_Pre Acceptance and Acceptance Procedure METALS

Waste Treatment Flows

SAR_Spill Control Procedure

SAR_Contingency Procedure

SAR_Waste Residues Plan

SAR_Closure and Decommission Plan

SAR_Legal and other requirements procedure

Additional procedures and controls produced by the management system which ensures 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.
- Performance against the management system is audited at regular intervals; and
- The Environmental Permit is complied with.

A copy of ISO certification is included as Section 3 with supporting procedures, an Operating Techniques Document (Section 10) and a summary of the key technical standards for the management of the recycling facility is included in Section 4.0 of this non-technical summary.

3.4 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) has been undertaken and submitted with the permit application to assess and mitigate risks associated with the proposed activities on the site.

Therefore only 'Amenity and Accidents' remains applicable for assessment in this instance, and includes the consideration of odour, noise and vibration, fugitive emissions (including dust, mud, litter and pests) and accidents. The ERA concludes that with the implementation of risk management measures, as described in the ERA, potential hazards from the facility are unlikely to be significant.

The ERA is supplied within the application in Section 4.

3.5 Wamitab / Technical Competence

Operations at the site are covered by the EU Skills scheme.

The EU Skills scheme considers the competence of the business as a whole. SAR operate under the scheme, where the company have a competence management system in place and is certified by one of the scheme's approval bodies.

Evidence of competence is supplied within the application in Section 5.

3.6 Directors Information

Directors' information supplied in Section 6 of this application.

3.7 Fire Prevention Plan

A Fire Prevention Plan has been produced as part of this application.

The FPP is included within Section 7 of this application.

3.8 Drawings

All site Drawings are included within Section 8 of this application.

Drawing list and references are shown below.

Drawing 001 Site Location Plan
Drawing 002 Permitted Area Boundary Plan
Drawing 003a Site Layout Building 1
Drawing 003b Site Layout Building 2
Drawing 003c Site Layout Building 3
Drawing 003d Site Layout Building 4
Drawing 003e Site Layout Building 5
Drawing 004 1km Receptor Plan (FPP)
Drawing 005 CCTV & Fire
Drawing 006 Drainage Plan (External)
Drawing 007 Site Access and Infrastructure Plan
Drawing 008 External Layout
Drawing 009 Drainage Plan (Internal)

3.9 Pre-application Advice

Pre application information is supplied in Section 9 of this application.

Enhanced pre application advice was received in 25/10/2024. This covered the appropriate fees and the required supporting information risk assessments required in relation to the proposed activities. The enhanced pre application request was incorrect in relation to all activities and fees and charges which led to the return of the application.

Further application advice was received in November 2025. This covered the agreed correct fees as stated by the EA post review of the first application submitted and the additional required supporting information required in relation to the proposed activities which is included within this application.

The below was raised at the secondary return stage which have now all been addressed and referenced in the NTS.

- Your non-technical summary and your application should clearly show the equipment that you will use on site, relevant abatement, treatment capacities, and detail tonnage for each activity being carried out. This should include process diagrams, process controls, reactions and description of plant systems and equipment. You have stated within your application that you will operate a hammer mill to process Catalytic Converters (RCF/Ceramic) and that Catalytic Converter (Metal coils) will be cut on shears and milled on the metal cats line, however we can

see no details on what these assets will include, or how they will be operated/managed and emissions controlled in line with BAT and relevant appropriate measures. Including WEEE Treatment.

Operational Techniques and process flows in place to support the above.

- You have provided EWC codes but not provided the tonnages to be processed through each activity applied for, and it is unclear which EWC codes will be accepted under which activity. You have identified non-hazardous waste codes for hazardous waste activities which may be a separate activity depending on the throughput of that activity. We are unclear how hazardous and non-hazardous wastes will be kept separate. As such we cannot confirm the activities to be carried out on site.

Included in NTS

- Environmental Management System – On review of your EMS document this does not include all information in line with our guidance, Summary does not include all points in Develop a management system: environmental permits

Summary of EMS contents provides, with an Operational Techniques Document, including Appropriate Measures tales, Climate Change and Key Operating Procedures included.

- Process flows – You have provided process flow diagrams in your operating techniques that are for site procedures. We require process flows that show the operations you carry out at your site. Where possible, please include details of inputs (Wastes/Raw Materials/Adjuncts), treatment processes and outputs (products, emissions – including abatement details, End-of-Waste products etc), so that we may fully understand how each stage of the treatment process works

Process flows included

- Site Drainage Plan (internal)

An updated Site Drainage Plan has been included

- BAT assessment – You have stated that BAT 24-32 are not applicable. BAT 24, BAT 25, BAT 26, BAT 27 and BAT 32 should be included within your BAT assessment On review of your BAT assessment this does not address key point as identified within the relevant appropriate measures for example you have advised that BAT 14d is not applicable, however you are operating mills that can produce diffuse emissions. You will need to update your BAT assessment to include all relevant BAT conclusions and ensure that it explains how you will meet relevant appropriate measures or provide an alternative solution that will provide an equivalent level of environmental protection

Updated BAT completed and provided

- Fire prevention plan – This references drainage plans that have not been provided, and is missing key risks that should be addressed in line with our guidance Fire prevention plans: environmental permits such as ELV water supply. We would request that this is reviewed to include all relevant activities on site and address the key risks in the above guidance.

ELV activity removed and drainage plan provided

- Flood zone – Your application states that "The site is not located in a designated flood zone." This is incorrect as the site is in Flood zones 2 and 3 and there may be a risk of pollution in a flooding event. As such you will need to provide a risk assessment of how you will manage this risk in the event of a flood.

ERA, Flood Risk Assessment included

- Dust emissions management Plan – This does not include a description of all activities on site such as your milling processes.

Updated DEMP included

- Accident management plan – you have not provided a copy of your accident management plan in line with guidance Develop a management system: environmental permits

SAR AMP included

3.10 BAT/OT Assessment

A BAT and Operating Techniques document has been produced as part of this application.

This is included within Section 10 of this application.

Appendix 2 of this document records the proposed Raw Materials to be used on site.

3.11 Site Condition Report

In line with EA guidance:

"It is in your own interest as an operator to produce a site condition report. An alternative approach would be for you to assume that the site is completely uncontaminated, irrespective of its previous history, but that would mean that any contamination by substances used at, produced or released from the installation that is discovered when you applied to surrender your permit would be considered to have resulted from your operation of your installation. You would then potentially be liable for remediation work, and would be unable to surrender your permit until you had completed it satisfactorily "

A Site Condition Report (SCR) has been produced in respect to this application and is included within Section 11 of this application which includes a stage 1-3 assessment, and where this identifies a risk to soil/and or groundwater you should establish baseline reference data in line with guidance Communication from the Commission — European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions (europa.eu).

3.12 Dust and Emissions Management Plan (DEMP)

A Dust and Emissions Management Plan (DEMP) has been produced as part of this application. This was required in the further advice given by the EA in July 2025.

The DEMP is included within Section 12 of this application.

3.13 Accident and Incident Management Plan

The company Accident and Incident Management Plan has been produced as part of this application. This is required as part of the EA Mange, Ent System Requirements.

This document is included within Section 13 of this application.

3.14 Appropriate Measures Review WEEE

A review of EA Guidance has been produced as part of this application. This is required as part of the EA Management System Requirements and Operating Techniques.

This document is included within Section 14 of this application.

3.15 Appropriate Measures Review Non-Hazardous Waste

A review of EA Guidance has been produced as part of this application. This is required as part of the EA Management System Requirements and Operating Techniques.

This document is included within Section 15 of this application.

3.16 Climate Change Risk Assessment Plan

A review of EA Climate Change Guidance has been produced as part of this application. This is required as part of the EA Management System Requirements and Operating Techniques.

This document is included within Section 16 of this application.

3.17 Flood Risk Assessment Plan

A review of Flood Risk for the site has been undertaken. This is required as part of the Environmental Risk Assessment for the facility.

This document is included within Section 17 of this application.

3.18 Habitats Management Plan

A review of Priority Habitats has been produced as part of this application. This is required as part of the Environmental Risk Assessment for the facility.

This document is included within Section 18 of this application.

4.0 Key Technical Standards

The key technical standards which will be employed to ensure that the proposed activities do not give rise to a significant environmental impact are summarised below:

- Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK
- Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities - Guidance - GOV.UK
- BREF for Waste Treatment
- BAT Conclusions for Waste Treatment - Waste Treatment | EU-BRITE
- Environment Agency Sector guidance notes S5.06 – recovery and disposal of hazardous and non-hazardous-waste - Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste - GOV.UK
- Fire-prevention-plans-environmental-permits – GOV.UK
- Waste batteries: appropriate measures for permitted facilities – GOV.UK (Draft only)

In summary, the rules and operating procedures employed at the site will ensure that:

- All waste is managed in accordance with the Environmental Permit and legal requirements.
- The management and prevention of fires on site will be controlled via the Fire Prevention Plan.
- The storage and treatment of waste is undertaken on impermeable surfacing with sealed drainage.
- Any storage vessels, tanks or containers used for the storage of any liquid fuel oil or other potentially polluting liquids/materials shall at all times be labelled as to the contents and will be fit for purpose.

Procedures are in place for the regular inspection and maintenance of storage areas and associated infrastructure, including site surfacing, drainage systems and containment measures. Records will be maintained detailing any action taken to repair infrastructure and faults.

5.0 Conclusion

The overall conclusion from the studies undertaken in support of the permit application is that there is unlikely to be a significant environmental impact upon potentially sensitive receptors or environment as a result of the proposed Environmental Permit activities.

SAR is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and with the implementation of the company's management system.

Appendix 1 – RAW Materials

Raw Materials – SAR Metals Ltd							
Raw Material	**Required Stage**	**Chemical Composition**	**Typical Usage per Annum**	**Quantity Stored on Site at One Time**	**Use of material**	**Hazardous Properties**	**Assessment of alternatives / Reduction**
Lubricating Oil	Plant and machinery Maintenance	Petroleum Hydrocarbon + Additives	Unknown	150 litres Stored in a suitable can / drum in a bund or drip tray.	Used for plant and equipment maintenance.	Prolonged or repeated contact with skin may cause mild irritation and possibly dermatitis. Mildly irritating to eyes. Waste oils may be carcinogenic.	Essential to proper operation of plant and machinery, no alternative available. Servicing of plant and machinery carried out in accordance with manufacturer's recommendations.
Hydraulic oil	Plant and machinery maintenance	Petroleum Hydrocarbon + Additives	Unknown	75 litres Stored in a suitable can / drum in a bund or drip tray.	Used in plant and equipment maintenance.	Dangerous to aquatic life.	Essential to proper operation of plant and machinery. Use will be minimised by correct servicing of plant and machinery to reduce the risks of leaks.

Diesel	Plant operation	C12H23	Unknown	5000 litres Stored in a double skinned tank with relevant signage externally. Stored in accordance with the oil storage regulations.	Fuel for site plant	Irritates the skin, eyes and respiratory tract.	Currently best option for fuel. Options are kept under review.