



OLIVE

Compliance

OPERATING TECHNIQUES

SAR Metals Ltd

3 Manby Road

South Killingholme

Immingham

DN40 3DX

Basis of Report

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ENVIRONMENTAL MANAGEMENT SYSTEM

FIRE PREVENTION PLAN

PROCESS FLOWS

1.0 Introduction

This report has been produced on the behalf of SAR Metals Ltd in support of a Bespoke Installation Permit Application under The Environmental Permitting (England and Wales) Regulations 2018 (as amended) for their facility at 3 Manby Road, South Killingholme, Immingham, DN40 3DX.

This document provides a summary of the key operational techniques and control measures that will be implemented at the site as a result of the proposed facility.

1.1 Report Structure

This report describes the operating techniques that are to be implemented at the facility to ensure compliance with the conditions of the Environmental Permit. The report has been drafted to satisfy the requirements of Environmental Agency (EA) Guidance¹ and is divided into the following Sections.

Section 1	Introduction
Section 2	Management
Section 3	Operations
Section 4	Emissions and Monitoring
Section 5	Information
Section 6	Closure

¹www.gov.uk/guidance/risk-assessments-for-your-environmental-permit

2.0 Management

2.1 Management System

SAR operate their own in-house 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.

The management system is supplemented by this document which outlines the operating techniques at the site and demonstrates conformance with the requirements of relevant Environment Agency guidance.

The company have achieved ISO certification for ISO14001. These certifications reinforce company credibility and their responsibility as a business. The company is committed to continuous improvement to ensure they have best practice processes in place. Surveillance audits and certifications further demonstrate the effectiveness of company management systems.

2.1.1 Management Structure and Responsibilities

The Operations Manager or (trained Nominated Person) is responsible for day-to-day operations and compliance with the Environmental Permit.

Whenever the site is open to receive or dispatch wastes, or will carry out any of the waste management operations, it will be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the permit regarding:

- waste acceptance and control procedures;
- operational controls;
- maintenance;
- record-keeping;
- emergency action plans; and
- notifications to the Environment Agency.

2.1.2 Technical Competence and Training

The site will be managed by sufficient staff, competent to operate the site. The management system will deliver the following:

- all staff will have clearly defined roles and responsibilities;
- records will be maintained of the skills required for each post;
- records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- operations will be governed by standard operating instructions.

An assessment of staff training needs will be carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training.

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The assessment of training needs will be reviewed on an annual basis.

Details of staff training procedures and recording are included in the company's Environmental Management System.

The training programme will ensure that relevant staff are aware of the following:

- regulatory implications of the permit for the site and their specific work activity;
- all potential environmental effects from operations under normal and abnormal circumstances;
- the need to report deviations from the permit; and
- prevention of accidental emissions and the action to be taken should accidental emissions occur.

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.

2.1.3 Site Security

Details of site security are included in the EMS.

In order to prevent unauthorised access, a number of site security measures will be in place at the site including;

- A 2.3-metre-high palisade fence with lockable gates protects the facility;
- Daily visual inspections of the site infrastructure, carried out by the Site Management Team will identify any unsatisfactory fence conditions, e.g. evidence of trespass.
- If appropriate, a temporary repair will be made immediately, and permanent repairs will be programmed in for completion within a 15 working day period;
- To ensure the security of the site and prevent access during non-operational times by vehicles and pedestrians the gates will be locked at times when the site is not active;
- The site will be inspected at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosure will be made secure by temporary repair as soon as is practicable. Permanent repairs will be affected as soon as practicable;
- All inspections, any defects, damage, or repairs will be recorded in the site diary; and
- The site has a CCTV system which was installed and is monitored by a UKAS-Accredited Security Monitoring Organisation.

A copy of the Site Inspection Document is included in the EMS.

2.1.4 Permit Surrender

To assist in permit surrender, records will be maintained to demonstrate how the land beneath the site has been protected at all times between the date of permit issue and the end of permit operations.

Records to be maintained will include:

- maintenance of site surfacing;

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- incidents and accidents;
- maintenance of drains and sumps; and
- actions taken to clean up incidents and spillages.

2.1.5 Display of Environmental Permit

A copy of the Environmental Permit will be kept available for reference by all staff and contractors whose work may have an impact on the environment. All staff will be informed where the Environmental Permit is kept.

2.1.6 Managing Documentation and Records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

The documents that will be included within the scope of the controls are as follows:

- policies;
- responsibilities;
- maintenance records;
- procedures;
- monitoring records;
- results of audits;
- results of reviews;
- complaints and incident records; and
- training records.

Records will be made and kept up to date on a daily basis to reflect deliveries, on site treatment and dispatches. All records relating to waste acceptance will be maintained and kept readily available on site and kept for a minimum of 2 years after the waste has been removed off site.

2.1.7 Reporting Non-Compliance and Taking Corrective Action

Procedures as detailed in the EMS and the company Accident Management Plan will ensure appropriate corrective action is taken in response to problems identified at the site. The procedure will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

- actual or potential non-compliance;
- system failure discovered at internal audit;
- suppliers or subcontractors breaking the agreed operating rules;
- incidents, accidents, and emergencies;
- malfunction, breakdown or failure of plant;
- other operational system failure; and
- complaints.

The action taken in response to the non-conformance may include:

- obtaining additional information on the nature and extent of the non-conformance;
- discussing and testing alternative solutions;
- modifying procedures and responsibilities;
- seeking approval for additional resources and training; and
- contacting suppliers and contractors (as applicable).

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2.1.8 Auditing and Legal Compliance

There will be a formalised internal inspection and auditing procedure to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored.

2.1.9 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure will review environmental performance, and ensure any necessary actions are taken.

2.1.10 Operational Control, Preventative Maintenance and Calibration

The management system will complement operational procedures so as to ensure effective control of site operations, the use of approved suppliers and contract services, the maintenance of operational equipment and the calibration of monitoring equipment.

The Site maintains a planned preventative maintenance (PPM) scheme where items of non-compliance are recorded, and appropriate timescales and owners are identified according to priority.

All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

The relevant procedures are contained in Section 3.20 of the EMS and in the ISO Management System.

2.1.11 Design and Construction Quality Assurance

All relevant elements of the site (not already constructed) will be designed in accordance with recognised standards, methodologies and practices.

The design process will use a risk-based approach and will be appropriately documented using drawings, specifications and method statements where appropriate to provide an adequate audit trail.

A competent and suitably qualified person will supervise the construction activities.

2.2 Accident Management Plan

The company recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

An accident management plan will be implemented and maintained at the site to ensure the site and site staff are fully prepared for any such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence.

The following accident management plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

A copy of the most current accident and incident management plan is included within the EMS.

2.2.1 Hazard Identification

The following accident hazards have been identified from the Environment Agency's Generic Risk Assessments.

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- Unauthorised Waste Acceptance;
- Flooding;
- Arson and/or Vandalism;
- Accidental Fire; and
- Spillage of Liquids.

The company will employ a number of measures to prevent the realisation of these hazards to the environment and human health.

2.2.2 Unauthorised Waste

Acceptance of unauthorised materials has the potential to cause harm to the environment and human health for example the receipt of dusty wastes could impact the amenity of the site's neighbours. All wastes received at the site will be subject to inspection and checking against the declaration on the waste transfer note. In the event that unauthorised waste is delivered to the site, the waste will be segregated and stored in a designated quarantine area within the building prior to export from site to a suitably permitted facility for recovery or disposal.

The BMS waste acceptance procedures are included with the EMS and a full procedure is covered in the Rejection Procedure.

2.2.3 Fire Prevention Plan

The risk of accidental combustion of the waste types accepted at the site is low. Notwithstanding this, to prevent and minimise the potential impact of fire, the company have an EA approved Fire Prevention Plan (See FPP Section 7 of this application). A brief summary of the measures which will be employed is as follows:

- incompatible materials will not be accepted at the site;
- the plant inspection schedule will include checks of electrical equipment within the site to ensure that any faults are identified and repaired;
- fire extinguishers will be provided at designated locations;
- smoking will not be permitted in the operational areas of the site;
- working practices will ensure the assessment of fire hazards and training of employees in fire prevention, e.g. the use of fire extinguishers and emergency procedures; and
- no wastes will be burned on the site and any fire at the site will be treated as an emergency.

In the event of a major fire, the following action will be taken:

- the Operations Manager or NP and Fire Brigade will be notified immediately and the Environment Agency as soon as practicable;
- the burning area will be isolated, and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
- the site and buildings will be evacuated.

2.2.4 Loss of Containment

Loss of containment could lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented:

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- *Containment system:* any facilities for the storage of oils, fuels or chemicals will be sited above ground on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound will be at least the equivalent to the capacity of the tank plus 10%. All filling points, vents and gauges will be located within the bund.
- *Storage tanks:* storage tanks will be constructed to the appropriate British Standard;
- *Inspection:* tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action;
- *Spill kits:* materials suitable for absorbing and containing minor spillages will be maintained on site; and
- *Monitoring techniques:* the site staff will undertake daily monitoring for evidence of spillage and leakage.

In the event of any potentially polluting leak or spillage occurring on site, the following action will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- Any dry wastes spilled on site will be collected and transported to the appropriate area of the site.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from entering surface water or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and the Environment Agency will be informed.

The spillage procedure, included in the EMS, details further information in regard to spillages on site and the company Accident and Incident Management Plan.

2.2.5 Security and Vandalism

As detailed in site procedure Security Management the following security measures are in place;

- *Site perimeter:* the site benefits from fencing around the perimeter;
- *Security gates:* will be locked at all times when the facility is unattended, and the site gate will be locked when the site is not in use at the entrance of the site;
- *Inspection:* gates and fencing extending around the site will be inspected regularly by the operations staff to identify deterioration and damage, and the need for any repairs;
- *Maintenance and repair:* fencing and gates will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;
- *Authorised access system:* all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and
- *Monitoring techniques:* operational procedures, including regular inspections will ensure continual monitoring of security provision at the site;
- *CCTV:* is installed around all operational areas of the site.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. Records to be maintained include inspections and maintenance of security fencing and gates, breaches of security, investigations and actions taken.

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2.2.6 Flooding

Checks conducted on the Environment Agency Flood Risk Map, identifies the site has having a very low risk of surface water flooding.

Surface water flooding, sometimes known as flash flooding:

- happens when heavy rain cannot drain away
- is difficult to predict as it depends on rainfall volume and location
- can happen up hills and away from rivers and other bodies of water
- is more widespread in areas with harder surfaces like concrete

Checks conducted on the Environment Agency Flood Risk Map, identifies the site has having a very low risk of flooding from Rivers and the Sea.

The site is classed as being in a Flood Risk Zone 23.

In support of the potential risk of a flood event, a Flood Risk Assessment Plan is included within the application with a recommendation of the preparation of a Flood Response Plan.

The site Accident and Incident Management Plan and the Emergency Preparedness procedure cover flood management.

3.0 Operations**3.1 Process Description**

SAR propose to undertake the below activities.

At this stage of the application process the site is not operational, with low level waste activities proposed under waste exemptions 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 WEEE wastes (shredding and abatement), these are not place or currently identified. However, buildings have been assigned where each activity will take place as part of the application process with an example of proposed equipment to allow the assessment of risk.

Description of activities

R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

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

D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

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

Table 1

Catalytic Converters

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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.
Directly Associated Activity -			
	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 specified within the permit. Undertaken in relation to activity AR1.
AR4	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 Honeycomb 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

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AR5	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 non-hazardous material to dispatch off site for recovery. 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	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	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)	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. Undertaken in relation to Activity AR1.

3.2 Permitted Activities

The waste management carried out are described and limited to those within the site permit.

3.2.1 Permitted Types and Quantities of Waste

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 in the NTS.

The list of permitted wastes is detailed within the Non-Technical Summary (NTS_SAR).

3.3 Waste Acceptance

3.3.1 Hours of Operation

The site will operate according to the hours stated below.

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Standard operating hours

There are no waste operations carried out during unsociable hours that could impact the local environ or receptors.

The site operates according to the hours stated below:

- Monday to Friday 07:00 – 00:00 hrs
- Saturday 07:00 – 17:00 hrs
- Sunday/Bank/Public Holiday Closed

Vehicle deliveries would only be between 8am to 8pm and only internal works past this will not impact any sensitive receptors. It is not expected that any vehicles will be on site past 18:00hrs unless there are contractor/waste contractor delays.

3.3.2 Load Inspection and Waste Control

All vehicles bringing waste material to the site will report to the weighbridge / or respective building where the load will be visually inspected, if possible, in order to confirm its description and composition against the relevant waste transfer note, and other accompanying documentation. All wastes will undergo a further visual inspection during deposition within the designated area.

Wastes will only be accepted at the site if the description in the accompanying documentation is in accordance with the permit and that onsite inspection confirms waste is consistent with the description provided.

Should the wastes be found not to conform during the initial visual inspection, then the details will be recorded, and the vehicle turned away. Should wastes already be discharged within the stockpile area and deemed not to conform or otherwise not be permitted then the waste will be picked out and:

- reloaded on to the delivery vehicle; or
- removed to a designated quarantine area as appropriate

Records of non-compliant waste received at the site will include details on:

- the quantity;
- characteristics;
- origin;
- delivery date and time; and
- the identity of the producer and carrier

Wastes will not be accepted unless the site is adequately resourced to receive the waste.

A record will be kept in the site diary of all rejected wastes. The waste producer and the Environment Agency will be notified of significant non- conformance.

Waste acceptance procedures are included in the company EMS and the company ISO Environmental Management System.

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3.3.3 Means of Measurement

The quantity of waste accepted and despatched from the facility will be measured via the onsite use of the weighbridge or site scales.

All wastes entering the site will be recorded upon arrival and the waste and recyclable components removed from site for disposal for further recovery or reuse will also be recorded on exit.

3.4 Waste Storage

Maximum waste storage on site at any one time will be managed in accordance with the sites approved Fire Prevention Plan.

All wastes are stored on a concrete impermeable surface with exception of clean and uncontaminated scrap metals stored externally on hardstanding.

3.5 Waste Treatment

Wastes accepted at the site for processing will undergo one or a number of the following treatments prior to transfer offsite for further recovery.

The activities are specified in Annex I and Annex II of the Waste Framework Directive 2008 as follows:

R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

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

D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

See Process Flow Charts within the Section 3 of this application.

Table 5 – Waste Treatment

Waste Type Accepted	Treatment
Catalytic Converters (RCF/Ceramic) Hazardous	See process flows
Catalytic Converter (Metal coil) Non Haz	See process flows
WEEE	See process flows
Non Ferrous Metal - non hazardous (alloy wheel rims, alternators)	Manually sorted into type and packaged in bags for export/recovery.
Ferrous Metal	Sorted into type and bulked for export/recovery.
Batteries (lead acid, ni-cd, ni-mh, Lithium)	Battery types segregated and stored in appropriate containers, awaiting removal to

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	authorised facilities.
	No treatment other than segregation.

Building 1**Non-Waste Activity - Data Wiping Services**

SAR propose that this building is to be used for the further development and growth of their Data Wiping services. Using software-based method that removes data from a storage device by overwriting it to allow the reuse of the equipment, which is important for protecting sensitive information when devices are reused, resold as a non-waste.

SAR will be contracted to carry this service out for the commercial, public sector and the public.

The wiping software scans the storage device (HDD, SSD, USB, etc.). It overwrites existing data with random characters or zeros. Once finished, the original data cannot be recovered.

Data wiping (also called data erasure) are methods used to make stored data permanently inaccessible so it cannot be recovered.

Electrical items will be delivered to site for this service, with the process completed, recorded and returned to the customer.

Waste Activity – Data Wiping Services and Recovery

SAR will also purchase WEEE wastes from the commercial or public sector for use or and resale. Pallets or containers of electrical items will be purchased for SAR to assess content and suitability for recovery or resale.

In the event electrical items are not in a suitable condition for repair or reuse, SAR will then classify these items as a waste, carrying out any data wiping required to these wastes, prior to onward recycling in Building 4. These wastes are stored separately from non-waste electricals, awaiting data wiping, and recovery.

Building 2 – Catalytic Convertor Recycling

SAR will accept both Hazardous and Non-Hazardous Catalytic Convertors for recycling purposes.

Pre-acceptance procedures are in place to ensure that SAR are aware of:

- the source and nature of the waste, including: • the types of waste present (for example, chemistry, classification
- the condition of the waste
- how the waste is packaged (for example, including type of container, packaging material, measures taken to prevent physical damage
- any hazardous properties (e.g. Refractory ceramic Fibres RCF)

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- potential risks to process safety, occupational safety and the environment (for example, from the presence of hazardous substances that could be dispersed during treatment)
- knowledge about the waste producer and previous waste holder

The below information is to be provided when SAR receive a customer query and before the waste arrives at the site:

- details of the waste producer including organisation name, address and contact details
- where the waste is coming from
- full description of the waste and its composition, including type
- the List of Waste codes (European Waste Classification (EWC) code)
- any hazardous properties and presence of any regulated chemicals, for example, (e.g. Refractory ceramic Fibres RCF)
- the type of containers and packaging used for the waste
- where available, information regarding the age and condition of the waste

At the acceptance stage, in addition to validation procedures, trained site operatives, will check all waste and to make sure they are fit for purpose and meet SAR acceptance criteria and quality

Any non-conforming waste will be quarantined to allow the site deal with them immediately and appropriately. Records are maintained of all rejections and non-conformances as part of the acceptance procedures and management system.

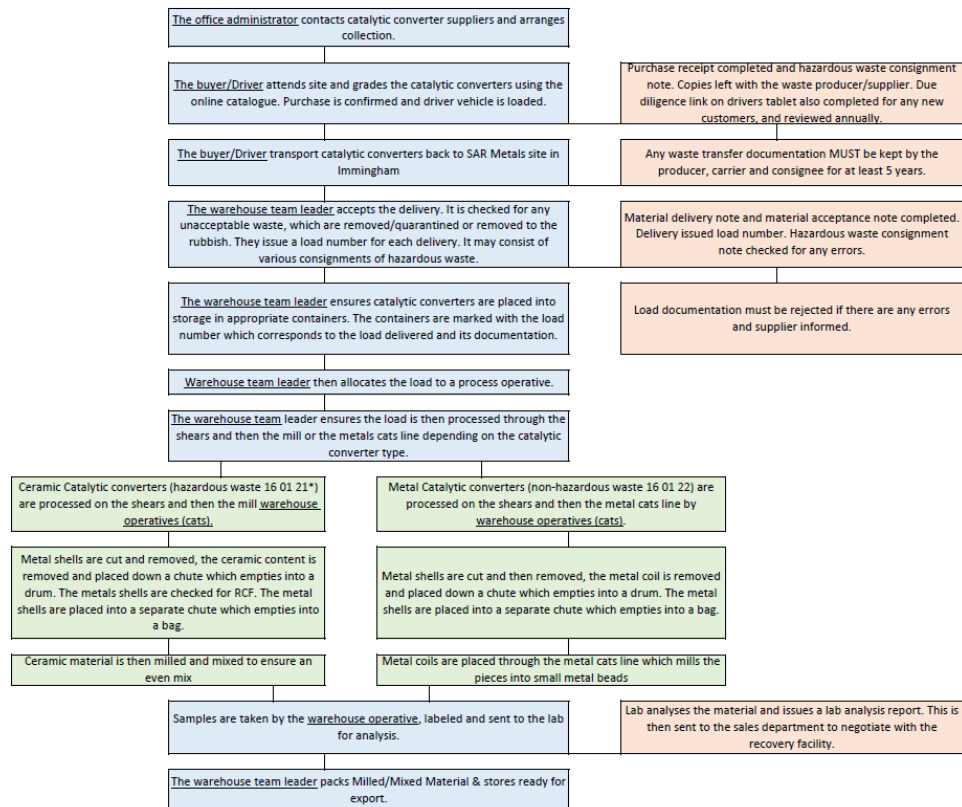
Building 2 allows the inspection all incoming Catalytic Convertors direct to the site. Within the buildings there is a quarantine area to keep Nonconforming waste away from other wastes prior to appropriate recovery and disposal.

Once inspected and approved for further processing, the wastes will then be treated in accordance with the below treatment process.

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Process owner - Managing Director

Catalytic Converters Purchase, Acceptance and Process Flow Chart (UK Only)



The abatement of emissions is controlled by the LEV system (SORTUS) detailed below with manual appended to the OT documents. At this stage the system and actual final specification of the system is still to be agreed based on installation. All operational procedures/documents will be updated once installation is completed.

There are no point source emissions to land, air, water or sewer from this process.

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**LEV System description**

The area of application is the dry filtration of mixed metal, refractory ceramic fibres (RCF) and ceramic scrap dust in aspiration systems for recycle processing, transport and storage.

Central aspiration system is used for collecting mixed metal and ceramic scrap dust from several aspiration points.

The aspiration system is divided into two separate operations. Only one operation can be online at the time.

First operation cleans ground floor in each working room separately. It is important to know that only one room at a time can be cleaned by this method. If more than one working room is online, the cleaning operation becomes more inefficient, because of the pressure drop occurs in the system. The first operation line hoods are installed between “H” type profile beams and the ground below is covered by welded mild steel sheet metal to get the most efficiency of cleaning. All hoods are connected parallel on each beam. The ducts are made from galvanised Nordfab steel.

The second operation consists of two aspiration walls inside each working room; two hoods above scrap collecting barrels in each section; aspiration wall and hoods near shredder and aspiration flexible hoses near mixer application. Flexible hoses are connected to aspiration walls and hoods. The second operation is focused for collecting mixed metal and ceramic dust from those aspiration walls and hoods via flexible hoses and galvanised ducts. Each section has manual air dampers for regulating work regime.

All line operations are connected to dust collector and fan. Dust collector is generally used for primary filtration for mixed metal and ceramic dust particles. Above the dust collector there are two heavy-duty air auto dampers for controlling work operations. The dust collector consists of filter cartridges, tanks and collecting barrels. After filtration, the primary cleaned air goes through a duct process and fan and ends at HEPA filter boxes for secondary filtration, which collects all remnants of

Operating Techniques

primary filtration dust, including RCF. There is total 4 boxes of HEPA filters that contains 2 pcs. per box HEPA cartridges. The cleaned air flow is regulated through air dampers which are installed just before HEPA filters. HEPA filtering is used when the cleaned air is needed to return to working rooms. All operations are controlled by control panel which is placed near dust collector.

Example Schematic below

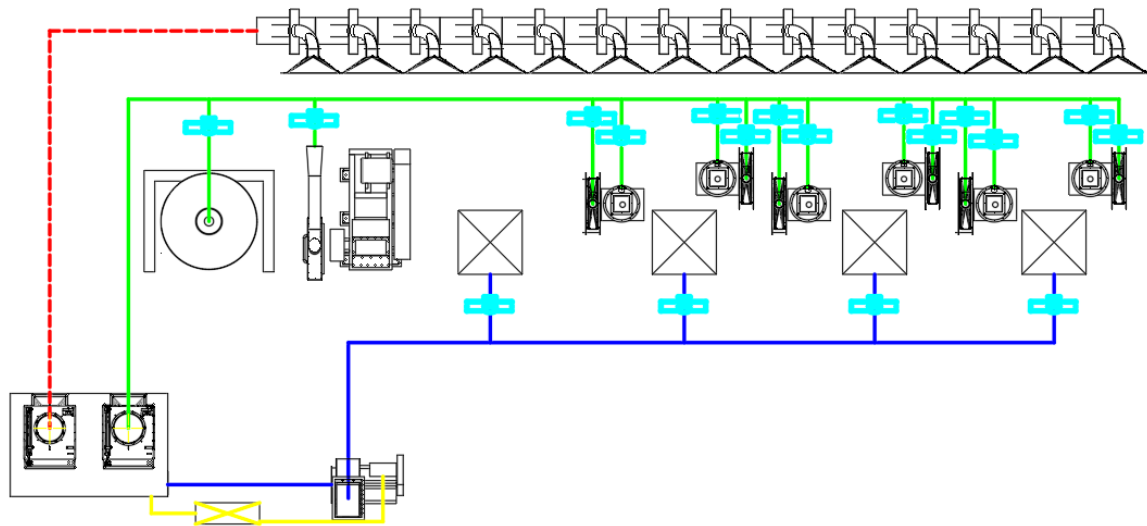


Figure 1.1 Technological scheme: 1) Ground floor cleaning line; 2) Room, shredder and mixer aspiration line; 3) Filtrated air return line; 4) Control panel; 5) Manual damper; 6) HEPA filter box 7) Dust collector; 8) Fan

Example of SAR system (Image 3)

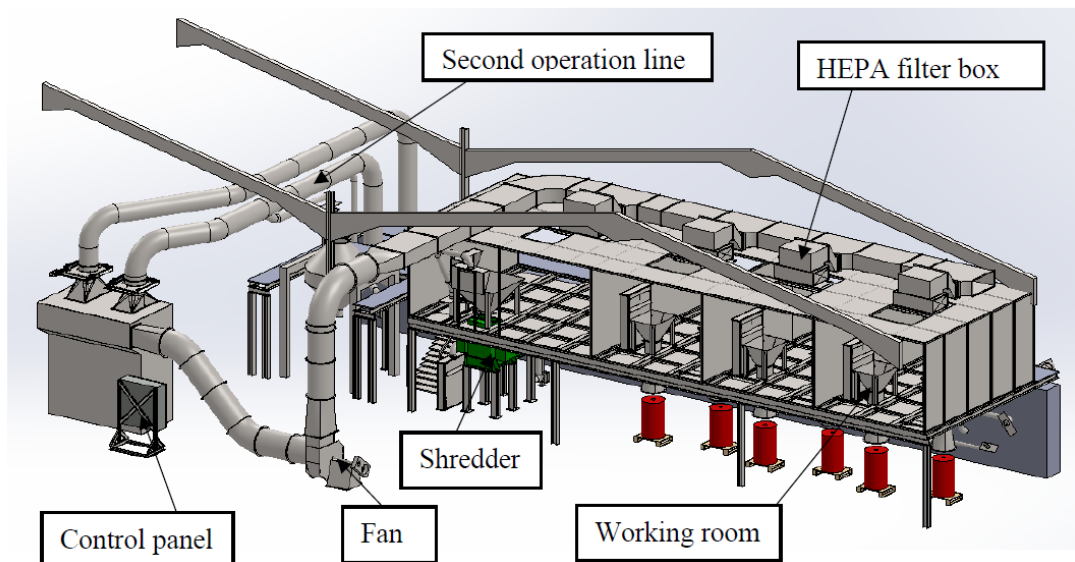


Figure 1.2 3D model of S.A.R. Metals Ltd. project 1

Operating Techniques

From the process, non-ferrous metal from the waste is sheared using alligator shears, to allow access to the cat casting. Metals are stored in a skip awaiting bulking externally in a secure container, for further recovery off site.

Ceramic Powder (may contain RCF) is extracted and stored in a bulk bag, secured with tracking information detailing the below

- Date of production
- Contents
- Batch data
- Site details

These are stored on pallets in the storage area of Building 2 awaiting export off site.

Onsite waste tracking systems monitor all waste streams including catalytic converters, ensuring that they are transferred once a viable load has been established and managed on a first-in first-out basis to prevent the accumulation of aged stock.

All activities are conducted in a weatherproof building, which provide a dry and cool environment, prevents exposure to extreme temperatures and sources of heat (including direct sunlight) and away from other relevant hazards such as vehicle movements, hot works.

All waste (with the exception of clean and uncontaminated scrap metals stored externally on hardstanding) is stored and treated within an enclosed building, with an impermeable surface and sealed drainage. There are no drainage features in this building the escape of any liquids or pollutants.

Image 4a and B – Milled catalytic powder/RCF awaiting removal off site



Image 5 – Ferrous metal storage from the process



CATALYTIC CONVERTOR EQUIPMENT – IMAGES



Catalytic Convertor acceptance containment



Alligator Shear

**Hammermill****Small mill****Cone/Blender****Building 3 – Battery receipt and storage**

SAR will receive separate collections of waste batteries (including collections of mixed batteries) but not to other mixed wastes that may contain waste batteries (for example, mixed municipal wastes) direct from the customer post initial contract and waste assessment pre acceptance.

SAR will also produce collections of waste batteries from on-site activities (for example, from the receipt of WEEE requiring treatment) or bulk electrical items which are not able to be reused or recovered so will be recycled into separate components.

The main types of waste battery that may be received at site may include:

- alkaline (primary battery)
- zinc-carbon (primary battery)
- nickel-cadmium (Ni-Cd) (secondary battery)
- nickel-metal hydride (NiMH) (secondary battery)
- lead acid (secondary battery)
- Li-ion (secondary battery)
- lithium metal (primary battery)
- silver oxide (primary battery)
- mercury (primary battery)

Lead acid, Ni-Cd and mercury batteries are classified as hazardous wastes under the List of Waste (LoW) or European Waste Catalogue (EWC) codes.

Unsorted collections of mixed batteries from households and businesses are also classified as hazardous wastes.

Lithium-ion (Li-ion) batteries are secondary batteries, which are rechargeable and typically used in electric vehicles (EVs), battery energy storage systems (BESS), phones, computers and other electronic equipment. Lithium metal batteries are primary batteries, which are not rechargeable.

No treatment is undertaken to batteries; they are bulked for onward recovery in the UK or export only.

Pre-acceptance procedures are in place to ensure that SAR are aware of:

- the source and nature of the waste, including:
 - the types of waste battery present (for example, chemistry, classification [for example, portable, automotive, industrial], or size)
- the condition of the batteries and, if known, information regarding their age and residual charge (for example, for high voltage electric vehicle batteries)
- how the batteries are, or will be, packaged (for example, including type of container, packaging material, measures taken to prevent physical damage, electrical shorting, exposure to liquids and high temperatures)
- any hazardous properties and persistent organic pollutant (POPs) content
- potential risks to process safety, occupational safety and the environment (for example, from the presence of hazardous substances that could be dispersed during treatment)
- knowledge about the waste producer and previous waste holder

The below information is to be provided when SAR receive a customer query and before the waste arrives at the site:

- details of the waste producer including organisation name, address and contact details
- where the waste is coming from
- full description of the waste and its composition, including type and chemistry of waste batteries and their quantity if known
- the List of Waste codes (European Waste Classification (EWC) code)
- any hazardous properties and presence of any regulated chemicals, for example, POPs
- the type of containers and packaging used for the waste
- where available, information regarding the age and condition of the waste and, where relevant, potential for self-heating, self-reactivity or reactivity to moisture or air

At the acceptance stage, in addition to validation procedures, trained site operatives, will check all waste containers and packages to make sure they are fit for purpose, including, where appropriate, that they are:

- in sound condition
- undamaged
- not corroded
- suitable for the contents (for example, its mass and other physical or chemical properties)
- with well-fitting lids, where relevant
- with caps, valves and bungs in place and secure, where relevant

Any non-conforming battery wastes or containers will be quarantined to allow the site deal with them immediately and appropriately. Records are maintained of all rejections and non-conformances as part of the acceptance procedures and management system.

Building 3 allows the grading and inspection all incoming batteries direct to the site, or from the activities in Building 1 (Data Wiping) or (Building 4) WEEE treatment. Incompatible wastes will be kept apart. Both Buildings 1,3 and 4 will have a quarantine area to keep damaged batteries away from other batteries or wastes prior to appropriate recovery and disposal.

Building 3 allows for the clear segregation and storage of batteries of different chemistries separately once sorted from mixed loads (for example, in separate containers), segregating batteries that have been tested or discharged from those awaiting testing or discharging.

Building 3 will have bays made up of concrete legio type brick (60cm (w)) to allow for clear segregation of all battery types awaiting recovery off site. Each bay will have signage to indicate the battery type for clear segregation and safety purposes depending on battery types and contracts.

Example of blocks



Batteries are stored in primary containers within each bay, comprising of acid proof containment (example shown below).



Batteries will not be stored for longer than the below EA proposed timescales.

Waste type	Maximum storage duration
Alkaline and zinc carbon batteries	12 months
Lead acid batteries	6 months

Other batteries (including NiCd, NiMH, lithium and mixed or unsorted batteries) 6 months

Other wastes (including battery components or fractions, scrap or off-spec products from manufacturers, electrolytes) 6 months

Onsite waste tracking systems monitor all waste streams including batteries, ensuring that they are transferred once a viable load has been established and managed on a first-in first-out basis to prevent the accumulation of aged stock.

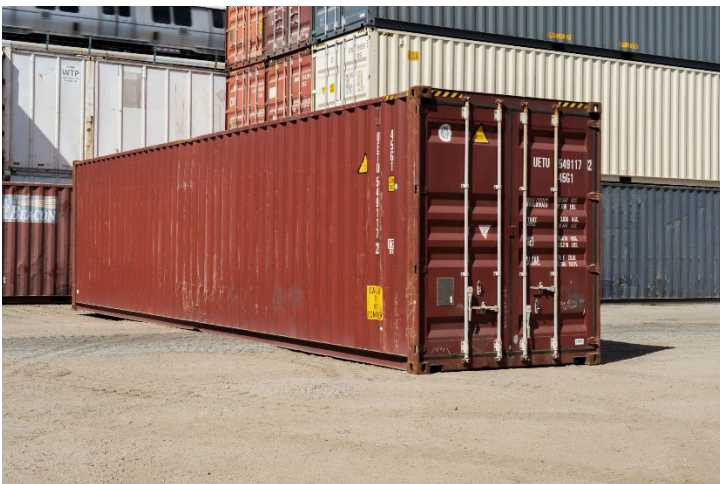
All batteries are stored in a well-ventilated, weatherproof building, which provide a dry and cool environment, prevents exposure to extreme temperatures and sources of heat (including direct sunlight) and away from other relevant hazards such as vehicle movements, hot works.

All batteries are stored on level ground with an impermeable surface and sealed drainage. Building 3 benefits from concrete surfacing, bunded boundary walls (up to 20cm) with batteries stored in concrete sealed bays and in containers. There are no drainage features in this building the escape of any liquids or pollutants.

Lead acid batteries will be stored upright with terminals capped or insulated. Other batteries should have terminals and any wired connections insulated where practicable, particularly lithium batteries and larger batteries and battery packs from WEEE and EVs, and will be packed in a way that prevents shorting or damage, for example, using a suitable packing material, such as vermiculite.

Upon the bulking of sufficient battery wastes for export, these are transferred to the bulk battery storage container located externally of Building 3 (example below) packaged and secure.

The container (example below) is sealed to prevent the escape of any leaks or emissions and sited on concrete surfacing away from any surface water drainage features or unmade surfaces.



SAR will receive separate collections of WEEE wastes direct from the customer post initial contract and waste assessment pre acceptance procedures.

SAR procedures follow a risk-based approach, considering:

- the source and nature of the waste

- any hazardous properties and persistent organic pollutant (POPs) content
- potential risks to process safety, occupational safety and the environment (for example, from the presence of hazardous substances that could be dispersed during treatment)
- knowledge about the previous waste holder
- the type of containment used for the waste

SAR will get the following information in writing when they receive a customer query:

- details of the waste producer (who you are receiving the waste from) including organisation name, address and contact details
- where the waste is coming from
- full description of the waste including the quantity
- the List of Waste code (European Waste Classification, EWC, code)
- any hazardous properties or presence of any regulated chemicals, for example, POPs
- if WEEE identified as POPs waste in the guidance on how to classify WEEE is described as not being a POPs waste, SAR will request evidence of the assessment demonstrating this
- with reference to Annex VII of the WEEE Directive, details of any treatment already undertaken

Pre-acceptance information is obtained through discussion, information provided by producer/holder or by contacting or visiting the waste producer.

Waste accepted into Building 4 is only for recovery and recycling purposes only.

Waste Acceptance

At the acceptance stage, trained site operatives, will check all wastes to ensure they meet the contract/customer agreement.

Building 4 allows for the initial grading and inspection all incoming WEEE direct to the site. Staff will use the SAR Waste Acceptance to verify each delivery/load with a breakdown of waste received, weight and quality.

Any non-conforming wastes will be quarantined to allow the site deal with them immediately and appropriately. Records are maintained of all rejections and non-conformances as part of the acceptance procedures and management system.

Building 4 will have a quarantine area to keep damaged batteries away mixed with WEEE waste streams from other batteries or wastes prior to appropriate recovery and disposal.

A quarantine area is in place for other WEEE waste not conforming with the agreed pre-acceptance discussions/quality.

All WEEE is inspected upon acceptance to assess condition, type, and potential for reuse or recycling. Any WEEE identified for re-use or repair, will be separated then sorted by commercial contract/viability for either 3rd party specialists or on site repair or directly sold by SAR.

Dismantling will be a manual process, using hand tools only. Waste materials will be sorted by type and/or grade of metal/WEEE/plastic.

WEEE waste types accepted

Televisions, computer monitors and other display devices – accepted for recovery

WEEE industrial and household items and appliances with components such as screens, circuit boards, such as IT equipment, mobiles, laptops - accepted for recovery

Batteries - accepted for recovery – removed from WEEE and bulked in Building 3 – no treatment

Cable - accepted for recovery

Circuit boards - accepted for recovery

Fridges, freezers, chillers and air-conditioning units – not generally accepted (if accepted in error mixed in loads these will be quarantined)

Large domestic appliances (LDA): white goods (washing machines, tumble dryers, dishwashers and cookers) **not generally accepted (if accepted in error mixed in loads these will be quarantined)**

Lightbulbs and lamps - not accepted (if accepted in error mixed in loads these will be quarantined)

All WEEE that may contain or containing POP's components as defined by Regulation (EU) 2019/1021 on persistent organic pollutants, is managed in full compliance with the regulation. POPs-containing WEEE and material fractions are segregated from non-hazardous WEEE and non-POPs materials and are not recycled.

Where POPs are present, the waste is directed to appropriately permitted downstream facilities for treatment that ensures the POP content is destroyed or irreversibly transformed, typically through incineration or equivalent thermal treatment.

Downstream contractors are subject to due diligence checks to confirm regulatory compliance and appropriate treatment methods.

Equipment

Manual tools

- Screwdrivers
- Pliers and needle-nose pliers
- Wire cutters
- Adjustable wrench

- Utility knife
- Small hammer
- Hex keys
- Hand shear
- Cable stripper

Treatment Activates

1. Remove outer casing.
2. Extract internal modules (circuit boards, motors, fans).
3. Separate wiring harnesses.
4. Remove cables
5. Remove mechanical parts (metal frames, screws)

Outputs

Any non-ferrous metal will be removed for onward recovery off site to an appropriate permitted/exempt facility.

Clean metals/plastic (eg: recasing) will be removed for onward recovery off site to an appropriate permitted/exempt facility.

Cable will be removed for onward recovery off sit to an appropriate permitted/exempt facility.

WEEE waste is then packaged securely under contract with customers, for export as an approved authorised treatment facility (AATF).

All waste for export is secure with tracking information detailing the below

- Date of production
- Contents
- Batch data
- Site details

Images 1 – 2 Packaged waste for export



All waste is stored and treated within an enclosed building, with an impermeable surface and sealed drainage. There are no emissions to air from these activities. There are no drainage features in this building to allow the escape of any liquids or pollutants to land or water.

Building 5

This building has been identified as a contingency storage area for WEEE or non-waste materials.

In the future the facility wish to shred residual WEEE waste that cannot be further recycled manually.

The shredding of WEEE waste is mainly to make recycling and material recovery easier and more efficient.

Shredding will break larger items into smaller particles, so they are easier to:

- Transport
- Store
- Process in recycling plants

WEEE waste can contain valuable materials such as:

- Copper
- Aluminium
- Steel
- Gold

- Plastics

After shredding, automated systems (magnets, eddy current separators, density separation, optical sorters) can separate these materials more easily off site or should SAR implement further sorting proposed as part of their further business development plans.

Shredding will improve Recycling Efficiency creating a mixed stream of small fragments that can go through mechanical sorting processes. This allows the recovery of higher percentages of reusable materials.

WEEE containing hazardous substances will not be shredded. Shredding would be carried out after manual treatment, such as the removal of batteries.

POPS wastes are screened out at the acceptance and pretreatment stage, so will never be recycled or shredded on site other than moving on to other facilities.

Shredding will support the data wiping and destruction side of the business for items such as

- Hard drives
- Servers
- Computers

No plans are in place to conduct this activity initially, as there is significant work to prepare the facility and move operations from their current facility.

The below are the proposals and controls in place in relation to the proposed shredding activity

Shredding throughput at this time is estimated at 4-5tonnes per day feeding into a dedicated enclosed bay, with metals segregated for onward recovery and shredded material bagged for onward recovery.

Shredder

Proposed is a 4 shaft 30Kwh shredder – electric powered

Example below

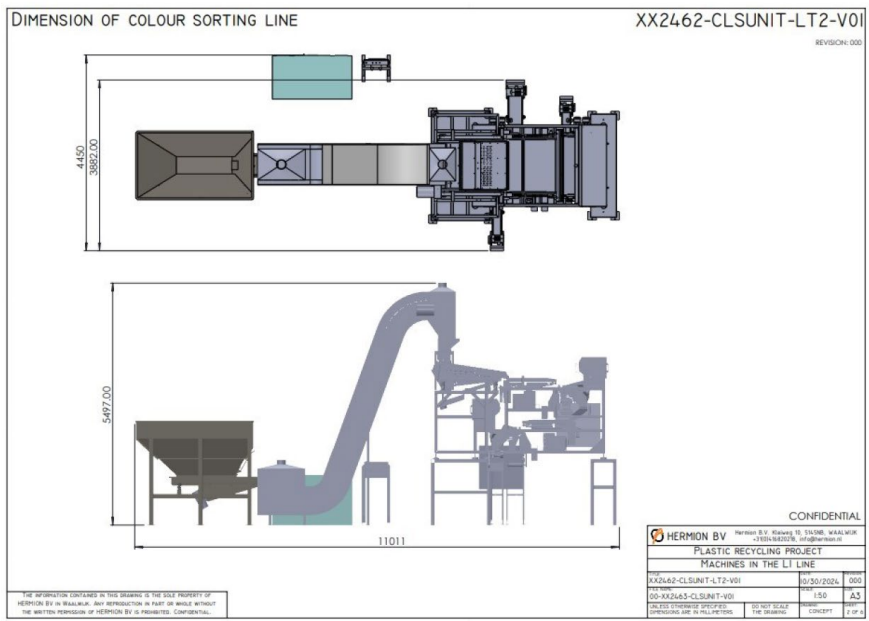
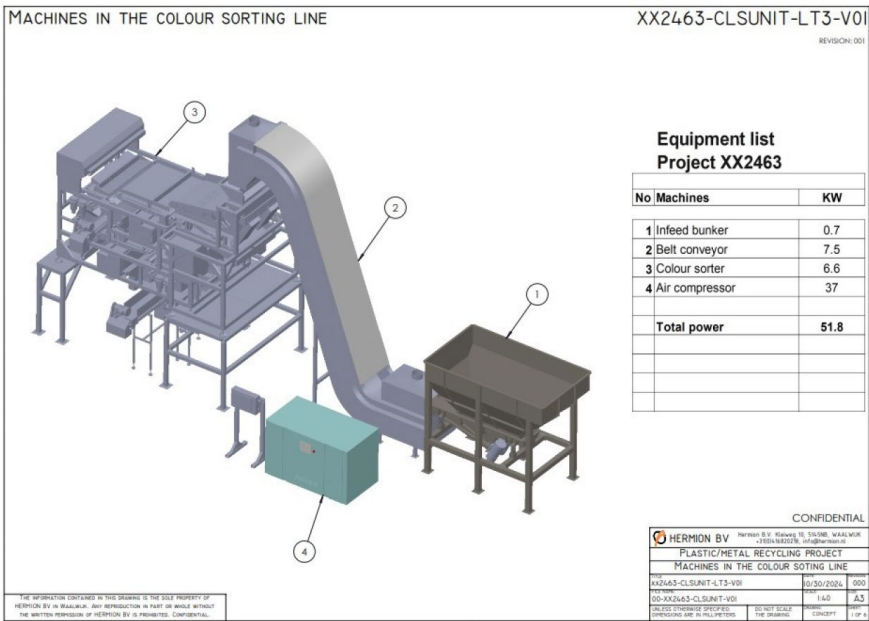


Optical sorter proposed

Technical capacity plant Approx. 500-2000 kg/h depending on the infeed material and size.

Electrical power supply - 52 kw incl small E-cabinet PLC controlled

Local exhaust ventilation (LEV): workplace fume and dust extraction will be installed to reduce any emission from the process (specification and model still to be agreed)



All waste is stored within the enclosed building, with an impermeable surface and sealed drainage. There are no emissions to air from these activities. There are no drainage features in this building to allow the escape of any liquids or pollutants to land or water.

Dust extraction systems will be fitted to the plant to reduce any impact within the building. Noise emissions will be controlled by the enclosed activity and low throughput.

We request a that a pre-condition is in place within the permit to allow the additional details to site equipment and final emissions controls to be included within the permit with agreed timescales for implementation.

External Storage

Clean and uncontaminated metals only may be accepted and stored externally in stockpiles (plate and girder/aluminium (no cutting fluids/swarf).

Externally a shipping container is in place to store batteries awaiting export.

Three containers are in place externally to store waste created on site and clean metals from the recycling processes on site (ferrous metals) or waste created on site (wood/packaging).

3.6 Site Infrastructure and Equipment

3.6.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight will be provided at or near the main site entrance.

The identification board will be inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board it will be repaired or replaced within a timescale agreed with the Environment Agency.

The board will display the following information:

- Site name and address;
- Environmental Permit holders name;
- Operators name;
- Environmental Permit (Waste Management Licence) number;
- Emergency contact name and telephone number;
- Statement that the site is authorised by the Environment Agency;
- Environment Agency emergency national telephone and general number;
- Days and hours the site is open to receive waste.

3.6.2 Plant and Equipment

All items of plant and equipment used on site will be maintained in accordance with manufacturer's recommendations.

4.0 Emissions and Monitoring

The site will be operated so that there will be no point source emissions to air, surface water, groundwater or land.

4.1 Surface Water and Groundwater

The site will accept permitted wastes only and will be operated to prevent fugitive emissions to surface water and groundwater.

4.1.1 Engineered Containment

All waste acceptance, treatment and storage areas for waste is conducted internally in buildings, these buildings benefit from an impermeable surface, kerbing or retaining sealed walls. The exception to this is the storage of clean uncontaminated scrap metals. These are stored on hardstanding externally in designated stockpiles.

The surface water drainage system collects water from the building roofs and general yard surfaces via a separate water system, running directly from the offices, which is linked to the same discharge point at the combined sewer.

4.1.2 Containment Bunding

All potentially polluting materials for example oils and fuels will be stored in containers provided with secondary containment. Containers and secondary containment will be impermeable, resistant to the stored materials and constructed to the appropriate British Standard.

Containers will be surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund or 25% of the total container volume within the bund, whichever is the greater.

Containers/Tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the containment and identify the requirement for any remedial action.

4.2 Odour

No putrescible or readily degradable wastes will be accepted at the site. Due to the strict control of the waste that will be accepted at the site, odour is not expected to pose a significant risk.

The procedure for managing complaints is detailed within the company Quality Environmental Management System.

An Odour Management Plan is not required in respect to this application.

The management of odour is also detailed in a specific procedure within the EMS and the company ISO Environmental Management System.

4.3 Dust

No waste consisting solely or mainly of dusts, powders or loose fibres will be accepted at the site.

As wastes are primarily accepted and treated within buildings the risk of dust occurring is low.

In the event the generation of dust occurs during storage or treatment of wastes, this will be monitored, and mitigation methods will be employed to reduce the risk of fugitive dust emissions.

Daily site inspections will be carried out by site management and site staff during the course of their normal working activities.

A Dust and Emissions Management Plan is required in respect to this application and included within Section 12 of the application.

The procedure for managing complaints is detailed within the company Quality Environmental Management System.

The management of dust is detailed in an EMS procedure and the company ISO Environmental Management System.

4.4 Noise

Waste treatment operations will only be carried out during operational hours and are all conducted internally.

All equipment will be maintained and operated in accordance with manufacturer's guidance and will be maintained in good working order.

The site will be operated so as to minimise noise emissions from the site. Measures that will be taken at the site include:

- locating plant away from noise-sensitive receptors where possible;
- the avoidance of dropping materials from height;
- switching plant off when not in use;
- the imposition of a speed limit for vehicles delivering waste to the site. The site has 5mph Speed Limit This will reduce noise associated with high engine speeds;
- the training of all personnel in the need to minimise site noise, and will be responsible for monitoring and reporting excessive noise when carrying out their everyday roles;
- regularly maintaining site plant and machinery to minimise noise resulting from inefficient operation of pumps, generators and engines;
- in the event that reversing alarms are found to give rise to complaints, alternative alarms or technology will be investigated;
- the regular maintenance of site surfaces to prevent the development of potholes will significantly reduce the noise generated particularly by empty vehicles exiting the site;
- consideration will be given to the fitting of noise suppression kits on items of plant and equipment; and
- all plant will be maintained in accordance with manufacturer's recommendations to minimise noise emissions.

Any complaint received will be logged in the site diary. The Operations Manager or NP will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

The measures employed at the site to minimise the emission of noise will be regularly reviewed by the Operations Manager or NP and additional measures will be employed where required.

The procedure for managing complaints is detailed within the company ISO Environmental Management System.

The management of noise emissions is detailed further in the EMS and the company ISO Environmental Management System.

4.5 Pests

Due to the nature of the wastes proposed to be accepted at the site, it is not anticipated that pests will pose a risk at the facility.

The facility will be inspected by both site management and operatives for infestations of pests, vermin and insects on a routine basis.

Should the level of risk to pest, vermin or birds increase, the Operations Manager /NP will be responsible for implementing additional controls which may include;

- Clearing of waste bays/storage areas (both internal or external);
- Use of pesticides;
- Use of bait boxes / bait traps;
- Employment of specialist pest controllers.

In addition, the regular turnaround of waste materials and ongoing housekeeping / cleaning regime is currently in place.

A specialist pest control contractor will be deployed if required.

The management of pests is further detailed as an SOP in the EMS and the company ISO Environmental Management System.

4.6 Litter

Due to the nature of the waste to be accepted on site, it is not anticipated that litter will pose a serious risk.

The site is subject to ongoing inspections during operational times. Litter and debris will be cleared as required.

The predominant waste stream accepted by the site is metal wastes, which is accepted and processed within the designated building. Any subsequent mixed waste from the process which could generate airborne litter is retained and loaded-out from within each building.

All other wastes are stored within designated bays, inclusive of bay walls, to minimise wind disturbance and possible generation of airborne litter.

Any litter which does escape the operation and is arrested by the site boundary fence will be removed at the end of the working day in which it is discovered.

In the event of any spillages of waste from the site boundary and into the local environment, it will be the responsibility of the Ops Manager or NP to arrange for litter picking of the affected areas within the same working day.

Any operation identified for the generation and escape of litter will be stopped, if required, until further measures can be taken.

In addition to the above, any outgoing wagons / trailer units and skips leaving the site when loaded with a waste material will be appropriately sealed / sheeted / secured to prevent the escape of litter.

Inspections will be carried out on a daily basis and a record maintained within the site diary.

The management of litter is further detailed in SOP Pest Management and the company ISO Environmental Management System.

4.7 Mud and Debris

It is therefore not expected that mud will feature as a problem for the site within the site, the following measures will be taken in order to prevent the deposition or tracking of mud or debris from the site onto public areas or highways:

- Good housekeeping practices are maintained at all times to ensure that the site is kept in a clean and tidy condition and to avoid the transport of mud and other detritus external to the site and surrounding areas.
- Vehicle access to the Site is directly from the road outside which is of tarmac construction.
- All vehicles are inspected for excess mud prior to leaving the site and, where necessary, cleaned off.
- The Site can also make use of an internal road cleaning service to ensure that the roads both on and off site remain clean.
- In the event that debris is generated from within the site it will be controlled by standard site management procedures, i.e. visual identification through the daily site inspection carried out by a competent person.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:

- the affected public areas outside the site will be cleaned; and
- traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable.

Inspections will be carried out on a daily basis and a record maintained within the site diary.

The management of mud and debris is further detailed in the EMS and DEMP , supported by the company ISO Environmental Management System.

5.0 Energy Efficiency

SAR will implement an energy efficiency plan/policy.

This will:

- define and calculate the specific energy consumption of the activity
- set annual key performance indicators – for example, specific energy consumption (expressed in kWh/tonne of waste processed)

- plan regular improvement targets and related actions

SAR will regularly review and update the energy efficiency plan as part of the facility's management system.

SAR will have and maintain an energy balance record for the facility. A breakdown of energy consumption and generation (including any energy or heat exported) by the type of source (electricity, gas, conventional liquid fuels, conventional solid fuels, and waste) will be produced.

SAR will regularly review and update their energy balance record as part of the facility's management system, alongside the energy efficiency plan.

Operating, maintenance and housekeeping measures will be in place in relevant areas, for example, for:

- air conditioning, process refrigeration and cooling systems (leaks, seals, temperature control, evaporator or condenser maintenance)
- operating motors and drives
- compressed gas systems (leaks, procedures for use)
- steam distribution systems (leaks, traps, insulation)
- space heating and hot water systems
- lubrication to avoid high friction losses
- boiler operation and maintenance, for example, optimising excess air
- other maintenance relevant to the activities within the facility

Control measures will be in place to avoid gross energy inefficiencies.

The procedure will follow Energy efficiency standards for industrial plants to get environmental permits.

Measures such as recording energy, fuel, raw materials and water are already in place and will be reportable to the Environment Agency in line with permit conditions.

6.0 Information

All relevant notifications and submissions to the Environment Agency regarding the site will be made in writing and will quote the permit reference number and the name of the permit holder.

Records will be maintained for at least 3 years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater the records shall be kept until permit surrender.

Duty of Care records will be kept for a minimum of 2 years with hazardous consignment notes retained for 3 years or the lifetime of the permit.

6.1 Reporting and Notifications

6.1.1 Changes in Technically Competent Persons/Company Competence

The Environment Agency will be informed in writing of any changes in the technically competent management of the site, together with evidence of the required technical competence.

6.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site for each quarter, will be submitted to the Environment Agency within 1 month of the end of the quarter unless otherwise required by the permit conditions.

6.1.3 Relevant Convictions

The Environment Agency will be notified of the following events:

- The company or directors being convicted of any relevant offence; and
- any appeal against a conviction for a relevant offence and the results of such an appeal.

6.1.4 Notification of Change of Operator's or Holder's Details

The Environment Agency will be notified of the following:

- any change in the operator's trading name, registered name or registered office address; and
- any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up.

6.1.5 Adverse Effects

The Agency will be notified without delay following the detection of the following:

- any malfunction, breakdown or failure of equipment or techniques;
- any accident;
- fugitive emissions which have caused, is causing or may cause significant pollution; and
- any significant adverse environmental and/or health effect.

6.1.6 Closure

Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- the Environment Agency shall be notified at least 14 days before making the change; and
- the notification shall contain a description of the proposed change in operation.
- The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan

7.0 Closure

This report has been prepared by Olive Compliance Ltd with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information

reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of SAR Metals Ltd no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from Olive Compliance Ltd.

Olive Compliance Ltd disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

