EUROPEAN METAL RECYCLING LIMITED

EMR SILVERTOWN

ENVIRONMENTAL MANAGEMENT PLAN

Permit No: EPR/WE1242AA

Unit 6, Factory Road
Silvertown,
London E16 2EJ

October 2024

Project Reference : YSLV - 05	Dated : October 2024
EMR SHEQ Technical Manager	SHE Specialist
Nick White	Ajibola Bankole

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Introduction

Introduction

The following Environmental Management Plan (formerly Environmental Management Plan) has been produced by European Metal Recycling Ltd (EMR) to support the Environmental Permit for EMR Silvertown, Unit6, Factory Road, Silvertown, London E16 2EJ and is based upon the requirements as set out in the Environment Agency (EA) guidance documents. The content of this management plan and the assessments contained within have been produced based on the requirements as set out in the EA's guidance document 'How to comply with your environmental permit' (formerly Working Plan guidance and specification document).

Full transfer of the Silvertown Environmental Permit (EPR/WE1242AA) from LCM Scrap Company Ltd to European Metal Recycling Ltd was completed on the 29/09/2022 .
The permit transferred is a Standard Rules Permit, reference: SR2015No 3.

The site is additionally registered under an S2 waste exemption registration reference: WEX346113 (S2: Storing waste in a secure place).
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This environmental management plan (EMP) is the core document of the site's Environmental Management System and environmental management of the site is also detailed in the Environmental Protection Procedures (EPPs) listed in the index in the Appendix (section 8 of this EMP outlines the site's EMS)

EMR Silvertown here after referred to as the site is situated at grid reference
TQ 42827 79906.

EMR is one of the largest metal recycling companies in the UK and operates many permitted and exempt metals recycling facilities throughout the UK and Europe.

The companies registered office (and head office) is:

European Metal Recycling Limited
Sirius House
Delta Crescent
Westbrook
Warrington WA5 7NS

Registered in England and Wales No. 2954623

EMR specialises in the processing, treatment, recovery and recycling of scrap metals and associated waste materials from industry, commerce and householders. Ferrous and non-ferrous metals are primarily recovered with further recovery processes also being developed to recover secondary materials such as plastics, glass, aggregates and tyres for further recovery and recycling. The processes used by EMR across its business

include sorting and grading into metal types, flame cutting, pressing and shearing of bulk materials, shredding of metals, depollution of vehicles and the use of unique mechanical and physical sorting methods to achieve maximum recovery of a range of metals and other materials for recycling.

Section 1 - Site description and characterisation of risk source

1.1 Specified site and waste management operations

The site is operated by EMR as a storage and treatment facility for recyclable non-ferrous metals and associated waste materials generated as part of EMR's recovery processes. This is otherwise classified as a 'Keep Treat and Dispose' operation as classified in section 35 of the Environmental Protection Act 1990.
Specified waste management operations.

Under the specified waste management operations (outlined in the permit and exemptions) the following activities may be undertaken on site using fixed or mobile plant:-

- Mechanical / manual sorting & segregation
- Bulking
- Baling
- Cropping /cutting
- Shearing / dismantling
- Size reduction / material separation
- Storage prior to bulk removal and export
- Management of transport of materials via road in and out of the site

1.2 Permitted wastes and activities

Site activities are focused on the import, storage, processing and export of processed ferrous & non-ferrous metal materials. Based on these activities and the available operational area of the site the following shall apply:

The permitted activities the operator is only authorised to carry out are specified in 2.1. 1 of the standard rules permit and are also outlined below:

Table 2.1 activities	
Description of activities	**Limits 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)	Treatment consisting only of sorting, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, repair or refurbishment, or cutting of waste for recovery. There shall be no treatment of WEEE containing ozone depleting substances. There shall be no treatment of batteries except for sorting. There shall be no mechanical treatment of cooling equipment or display equipment. The maximum quantity of non-hazardous waste subjected to a shredding operation shall not exceed 75 tonnes per day. The maximum quantity of hazardous waste treated for disposal or recovery shall not exceed 10 tonnes per day. This does not include the manual sorting, manual dismantling, repair or refurbishment of WEEE. Wastes shall be stored for no longer than 1 year prior to disposal or 3 years prior to recovery. The maximum quantity of hazardous waste stored at the site shall not exceed 50 tonnes at any one time of which no more than 10 tonnes shall be stored for disposal. This does not include WEEE awaiting manual sorting, manual dismantling, repair or refurbishment.

The European Waste Catalogue (EWC) codes that cover materials accepted are listed in Table 2 as follows.

Table 2 – EWC Codes for wastes that may be accepted or encountered at site.

Chapter From European Waste Catalogue that codes have been selected	Sub-section	Code
02 – Wastes from Agriculture, Horticulture, Aquiculture, Forestry, Hunting and Fishing, Food Preparation and Processing	None	02 01 10 waste metal
12 – Wastes from Shaping and Physical and Mechanical Surface Treatment of Metals and Plastics	12 01 wastes from shaping and physical and mechanical surface treatment of metals and plastics	12 01 01 ferrous metal filings and turnings
		12 01 03 non-ferrous metal filings and turnings
15 Waste Packaging; Absorbents, Wiping Cloths, Filter Materials and Protective Clothing not otherwise specified	15 01 packaging (including separately collected municipal packaging waste)	15 01 04 metallic packaging
		15 01 05 Composite packaging
16 Wastes not otherwise specified in the lists	16 01 End of Life Vehicles	16 01 04* Env of Life Vehicles

		16 01 06 - end-of-life vehicles, containing neither liquids nor other hazardous components
		16 01 17 ferrous metal
		16 01 18 non-ferrous metal
		16 01 21* hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14
	16 02 wastes from electrical and electronic equipment	16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15; 16 01 17 ferrous metal;16 01 16 tanks for liquefied gas
	16 06 batteries and accumulators	16 06 01* lead batteries (A)
	16 06 batteries and accumulators	16 06 05 other batteries and accumulators 16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15* hazardous components removed from discarded equipment (A)
	16 08 spent catalysts	16 08 01 spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)
		16 06 02* Ni-Cd batteries
		16 06 04 alkaline batteries
		16 06 05 Other batteries & accumulators
17 Construction and	17 04 metals	17 04 01 copper, bronze, brass

Demolition Wastes (including road construction)	(including their alloys)	
		17 04 02 aluminium
		17 04 03 lead
		17 04 04 zinc
		17 04 05 iron and steel 16 08 01 spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)
		17 04 06 tin
		17 04 07 mixed metals
		17 04 11 cables other than those mentioned in 17 04 10
19 Wastes from Waste Management Facilities, Off-site Waste Water Treatment Plants and the Preparation of Water Intended for Human Consumption and Water for Industrial Use	19 01 wastes from incineration or pyrolysis of waste	19 01 02 ferrous materials removed from bottom ash
	19 10 wastes from shredding of metal-containing wastes	19 10 01 iron and steel waste
		19 10 02 non-ferrous waste17 04 07 mixed metals17 04 06 tin
		19 10 06 other fractions other than those mentioned in 19 10 05
	19 12 wastes from the mechanical treatment of waste (for example sorting, crushing, compacting,	19 12 02 ferrous metal

	pelletising) not otherwise specified	
		19 12 03 non-ferrous metal
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 & accumulators
		20 01 34 Batteries & accumulators other than those mentioned in 20 01 33
		20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23, and 20 01 35
		20 01 40 metals

* - Indicates that waste may be classified as hazardous, (A) indicates that waste is an absolute entry within the European Waste Catalogue, (M) indicates that waste is a mirror entry within the European Waste Catalogue and has been assessed to be containing hazardous liquids or other hazardous components.

This list is anticipated to cover all eventual process materials that may be handled by EMR at the site it is considered to be the best fit to the existing waste management permit in the absence of a code list issued by the EA.

1.3 Hours of operation

Normal Operating Hours:

Mon- Fri	07.00 – 18:00
Sat	07.00 – 13:00
Sun & Bank Holidays	Closed

The hours of operations are dictated by planning permission requirements and must be strictly adhered to.

1.4 Staff Competency and Training

The site will be staffed by person (s) who are Technically Competent and have undergone technical competency training or a technically competent person shall be available for the site for the allotted minimum times according to permit requirements. Certain relevant key staff (e.g. operations manager) will undergo WAMITAB / NVQ training (or equivalent). At the time of writing, the TCM for the EMR Silvertown depot is Neil Hayes.

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

1.5 Environmental Permit (and EMP)

A copy of the Environmental Permit will be displayed in a prominent place (e.g. notice board) and replaced by a new copy if it is removed or is defaced in anyway.

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

If there are changes of the operations manager for the site the Environment Agency must be informed. If there are any significant changes in the operation of the site the Environment Agency will be informed (and the Environmental Permit may need to be varied).

Subject to any conditions within the Environmental Permit, prior written consent will be gained from the Environment Agency before any specific changes are made to the Environmental Management Plan. (EPP7.1)

Section 2 - Site engineering for pollution prevention and control

2.1 Engineered site containment and drainage systems (includes effluent collection systems)

2.1.1 Impermeable Site Surfaces

All storage of scrap metal prior to processing will be undertaken on an impermeable surface, comprising high specification concrete with reinforced construction, served by a sealed drainage system.

The impermeable surfaces will be maintained to prevent fluids running off to un-surfaced areas, and to prevent the transmission of fluids through the pavement or its construction joints.

Processed materials will be stored on a suitably maintained hard standing prior to dispatch from site.

Impermeable surfacing specification: For any new re-surfacing works, the impermeable surface will comprise of a 200mm thick concrete CSO Fibrin - polypropylene fibre (to prevent shrinkage) with one layer of 252mm reinforced mesh spaced 50mm off the base of the concrete layer and underlain by a 1200 gauge membrane. The surface is constructed as separate slabs or bays with contraction and expansion joints and sealed with hot poured plastic sealant, supported by an underlying Type 1 limestone or granite sub-base.

2.1.2 Sealed Drainage Systems and Trade Effluent discharge

Any surface water run off from impermeable surfaces will pass into the sealed drainage system (no direct runoff); the drains will then feed the surface water runoff through an oil- water interceptor to separate any oil from surface water. Once the runoff has passed through the interceptor located under the site, the effluent will be discharged via an outfall to foul sewer (regulated by Thames Water).

2.1.3 Bunded Areas

Potentially contaminating liquids, such as fuels and oils shall be stored on site in appropriately engineered containers and bunds designed to a minimum 110% holding capacity for a single tank. Where two or more tanks are held within one secondary containment system or bund, the bund will hold at least 110% of the biggest tank's maximum storage capacity or 25% of the total maximum storage capacity of all the tanks, whichever is the greatest. All bunds will be constructed of materials impermeable to water and oil. Engineered catch systems will be employed in areas where fluid spills may potentially occur.

A secondary bund will be required if the tanks are not double skinned.

Tanks and bunds are inspected weekly to ensure their continued integrity. Any defects observed will be made secure (at least temporarily) by the end of the working day with permanent repairs being instigated within 7 working days. Inspections, defects, damage and repairs will be recorded in the site diary and on an Event Log (plus the sites environmental files where appropriate).

Where authorised contractors are used to remove accumulations of contaminated liquids from bunds on site, copies of transfer notes or hazardous waste consignment notes will be retained within the sites environmental files for an appropriate period as detailed in section 7.

2.1.4 Maintenance Schedules

All inspections, defects, damage, maintenance and repairs will be recorded in the appropriate site files, Evotix Event Log or the sites diary / log.

Drainage systems including gullies, drains, drain covers, bunds and interceptors will be inspected on a daily basis in accordance with the manufacturer's recommendations and interceptors will be emptied (as required) by an authorised contractor (normally at least once per annum).

All operational mobile plant and fixed equipment will be maintained and inspected by a competent person and records of inspections and maintenance schedules shall be retained on site and any defects recorded and actions for repair logged.

The maintenance and inspection plan is encompassed in a number of documents and systems:

- CMS System (electronic maintenance management system) implemented and used.
- Pre-use checks performed on all static and mobile plant and recorded on relevant document.
- 500 hour service & maintenance performed by external service engineers on mobile plant (e.g. Liebherr, JCB).
- Electrical testing & servicing performed by competent & authorised contractors (e.g. DJW Ltd).

Records are mostly kept electronically. Any actions required are recorded on action log on CMS system.

Damaged and worn site surfaces will be repaired as required as part of the on-going site maintenance program. The site manager will undertake regular checks of the sites surfaces to ensure that they are maintained in good condition and repairs across the site are anticipated and planned for.

The company makes financial provision for the maintenance of the site on an annual basis and repairs are undertaken at times when maintenance shutdown periods are planned or when stocks on site can be relocated to appropriate alternative storage areas.

Section 3 - Site infrastructure

3.1 Provision of Site Identification Board

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

- Site Name & Address
- Environmental Permit Holder Details
- Operators Details
- EMR Emergency Out of Hours Contact Numbers
- Opening Times
- Environmental Permit No.
- Environment Agency Contact Numbers
- Operational hours

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

3.2 Site security and fencing

The site will be serviced by 24 hour CCTV manned by an approved contractor (currently MITIE). The site will be secured by a combination of fencing and walls (including building walls) which prevents access on all sides. The offices will be located adjacent to the main weighbridges and where possible close to the site entrance, all entrance gates to the site will remain locked outside of operating hours. Gates will be provided at the entrance and the site will be fenced to a minimum height of 1.5 metres.

The site will be kept closed and secure at all times when unattended. Any defects shall be made secure by temporary repair by the end of that working day and shall be fully repaired within seven working days of the damage being identified.

All defects, damage and repairs will be recorded in the site diary or the sites maintenance logs. Sites will also employ additional security methods such as CCTV and motion sensors.

3.3 Lighting

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

The lighting will be inspected at commencement of each working day. Any defects shall be fully repaired within seven working days of the damage being identified.

All defects, damage and repairs will be recorded in the site diary, Event Log and the sites maintenance logs as appropriate.

3.4 Location and Topography.

The EMR site is surrounded on the western, southern and eastern boundaries by existing industrial/commercial uses. Factory Road is located along the northern boundary which runs parallel with the A112 Albert Road. The Elizabeth underground railway line runs west to east and runs parallel between Factory Road and the A112 Albert Road. Albert Road and Factory Road are relatively busy with traffic.

Figure 1 - Aerial photo of location of site (site shown in blue).

The eastern end of the Elizabeth line is shown (located 15m north of site), the purple line represents the point at which tube trains emerge and enter underground tunnels. Factory Road and Albert Road are also shown. The topography of the surrounding area is relatively flat, although elevated by a few metres above the level of the River Thames (partially shown about 200m to the south of the site).

Section 4 - Site operations

4.1 Control of mud and debris

The site benefits from an impermeable pavement extended across pre-treatment storage areas, processing areas and the sites main access roads; therefore mud and other debris are unlikely to be tracked onto the road from inside the site. In addition to the provision of impermeable site surfaces the site possess and /or contract mobile sweepers provided to remove any other debris that could potentially be tracked onto the road from inside the site.

The access road to the site will be visually inspected on a regular basis. In the event that mud or debris is observed which is likely to have arisen from the site, action will be taken as soon as possible to resolve this issue. The sites use an appropriate contractor available to remove mud, dust and debris, on a regular scheduled basis (2-3 timed per week).

Any abnormal event outside of day to day operations where the increase in attendance of sweeping contractor is required, such as a specific load brought to site which has caused mud and debris (e.g. contaminated with construction waste), will be recorded in the site diary /log (EPP4.4).

Jet washing is mainly limited to mobile plant on site (not road vehicles). As there the site is concreted throughout (no compacted soil / unmade ground) and the wastes comprise of scrap metal wastes, there is little to no mud produced (compared to other types of waste facility) and jet washing is conducted intermittently.

[See – DEMP v2 (Oct 24)]

4.2 Potentially polluting leaks and spillages

Storage of liquids will be undertaken on site in line with section 2.1.3 of the Environmental Management Plan. Regular maintenance and checks will be carried out on all plant and equipment to prevent and identify any potentially polluting leaks.

Equipment and materials for cleaning up leaks and spillages will be installed and maintained on site and with procedures for its use and storage locations made known to all operatives. Any contaminated absorbent materials used to clean up spills will be disposed of at a suitably permitted facility.

Any minor spillage will be cleaned up utilising the spill kit materials maintained on site.

Where a major potentially polluting spillage has occurred, immediate action will be taken to prevent the spillage entering surface water drains, watercourses or

contaminating un-surfaced ground. Any spillages are cleaned up immediately using absorbent materials, (booms and drain blocks in more serious cases) and the contaminated absorbent material placed in sealed containers; if any polluting substances leaves the site's boundary, the Environment Agency will be informed (these actions will also form part of the site's Emergency Plan). Any significant potentially polluting incidents will be recorded in the site diary and on an Evotix Event Log (EPP5.2).

4.3 Fires on site

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

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

- In the event of a fire that can not be extinguished safely with on-site equipment, the Fire Brigade will be contacted by dialling 999.

- The site Emergency Plan will be initiated

- The site manager will evacuate all staff and visitors from potentially hazardous areas and direct them to the nominated fire assembly point and ensure all relevant personnel are present.

- The staff at the weighbridge will be informed for the purposes of directing emergency service vehicles.

- The following EMR personnel will be contacted to notify them of the situation:

  Operations Manager
  SHE Specialist

- Once the fire brigade are called and the relevant EMR staff notified, the Environment Agency will also be notified by either their main number within office hours or via the Environment Agency Emergency No. 0800 80 70 60 (outside of office hours). An incident reference will be requested from the EA and recorded on the Evotix Event log.

- Where required appropriate contractors will be instructed to deal with fire water and other linked residues.

All minor fire incidents are recorded in the site diary; any significant potentially polluting incidents will be recorded on an Event log and the site diary.
[See **Fire Prevention Plan (FPP)** for further details].

4.4 Waste acceptance and control systems and procedures

4.4.1 Waste acceptance

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

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

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

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

Written records of all rejections are maintained by weighbridge staff. The Environment Agency will be informed of any loads quarantined on site or rejected from site that pose a significant risk of pollution to the environment or risk to human health outside of the site boundary (EPP1.1 -1.11).

4.4.2 Non-conforming wastes

In the event that non-conforming / non-permitted waste materials (e.g. prohibited items such as gas bottles) are identified following initial visual inspections, the material / item will be separated on discovery and quarantined in an appropriate quarantine area. An assessment will be made of the properties of the waste, and if necessary specialist advice obtained regarding handling and disposal.

4.4.3 Hazardous Wastes

The site only accepts those wastes detailed in Table 3 however other hazardous wastes may be generated as part of treatment processes. Any hazardous wastes accepted at the site will only be accepted with the appropriate hazardous waste consignment paperwork and transfer notes in accordance with the Hazardous Waste Regulations 2005 and industry guidance. These wastes will then be stored in appropriately engineered areas.

Any contravening hazardous wastes discovered in loads will be isolated and traced back to there source supplier where possible. If the source of the hazardous waste cannot be ascertained, then the waste will be quarantined until it can be safely treated on site or until it can be removed from the site for reprocessing or disposal at an appropriately permitted facility (EPP1.3).

4.4.4 Wastes Containing Liquids

The site will not accept tanks or drums (e.g. scrap oil tanks) unless they have been confirmed as having been purged of their contents through provision of a purge certificate / 'certificate of cleansing' or via suitable inspection points being provided.

4.4.5 Pressurised Containers

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

Records of the collection of gas cylinders shall be retained in the site diary or the sites environmental files and recorded on a Evotix Event log.

4.5 Waste sampling and testing

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

4.6 Waste quantity measurement systems

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

The sites weighbridges are calibrated on a minimum annual basis under service contract and more regularly if required when maintenance is undertaken. The validity of these calibrations will be confirmed on a minimum annual basis by the weights and measures section of the Trading Standards Agency, this can again be undertaken more regularly if required.

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

4.7 Storage of wastes

Wastes with particular hazardous properties may require special storage and tracking controls over and above those specified in sections 1.1, 2.1 and 4.4, in order to prevent and control risks to the environment from the storage of these wastes.

4.7.1 Storage and depollution of end of life vehicles

The End-of-Life Vehicle Regulations 2003, Statutory Instrument No. 2635 regulates the acceptance, storage and depollution of end of life vehicles.

Storage Areas
Storage and treatment areas will be engineered with appropriate, impermeable surfaces and provided with appropriate equipment for the treatment of water (including rainwater) in their through the provision of sealed water storage tanks or through diversion via a full retention interceptor to an appropriately permitted final discharge point.

The treatment of waste motor vehicles shall only be carried out in areas of the site which have the following;

- Appropriate areas engineered with impermeable surfaces to protect the underlying ground and groundwater and provided with spillage collection facilities.
- Appropriate areas provided with containers that are appropriate for the storage of materials removed from vehicles where separation is required, i.e. batteries;
- Appropriate areas provided with suitable storage tanks used for the appropriate storage of any fluid from a waste motor vehicle;
- Appropriate areas for the storage of used tyres without excessive stockpiling, and minimising any risk of fire.

Treatment operations for the depollution of waste motor vehicles
The treatment / depollution of waste motor vehicles stall consist of following when applicable:

- The removal of the battery or batteries;
- The removal of the liquefied petroleum gas tank;
- The removal or neutralisation of all potentially explosive components (including air bags) through deployment;
- The removal, collection and storage of all vehicle operating fluids, excluding those which need to be retained for the reuse / recycling of any operating parts, including ;
    - Petrol or Diesel
    - Engine Oil
    - Brake fluid
    - Windscreen wash water / antifreeze mix (glycol)
    - Shock absorber oil
    - Air conditioning gases (where applicable)
- The removal, so far as is feasible, of all components identified as containing mercury.

In order to promote the subsequent recycling of ELVs, the following may be removed and segregated where present in order to promote to facilitate this.

- The catalyst or catalysts (hazardous waste);
- (Either during shredding or otherwise) of non-ferrous metal components;
- The tyres;
- (Either during shredding or otherwise) of all large plastic components;
- (Either during shredding or otherwise) glass;
- Where any such article or material is removed it shall be done in such a way as best promotes its recycling.

[See EPP1.5 ELV Acceptance; EPP 2.1 Storage of ELVs; EPP 6.1 ELV depollution and SOP (Standard Operating Procedure) ELV depollution]

4.8 Specified Waste Treatment Process – Plant, Equipment and Procedures

4.8.1 Acceptance and Storage of Lead Acid Batteries

When lead acid batteries are received on site and are subsequently stored prior to transfer to a suitably permitted treatment facility the following steps will be followed:

Acceptance

EMR will only accept waste on site in accordance with its waste acceptance procedures. The site will maintain waste transfer records as specified in section 7 of the Environmental Management Plan. Lead acid batteries are classified as hazardous waste and therefore they must be accepted and dispatched from site in accordance with the Hazardous Waste Regulations 2005.

Storage

1. All batteries will be stored undercover and / or in lidded containers in a storage area with an impervious floor.

2. Neutralising materials, liquids or absorbent granules will be maintained on site for use in there event of a battery acid spill. Staff will be trained on site in spillage management procedures.

3. If an acid spill should occur, it will be cleaned up immediately.

4. All batteries will be stored upright in acid resistant plastic battery bins. Where practical these should be covered prior to transfer to the battery storage area to prevent the ingress of water.

5. All designated battery storage areas/battery storage bins will be clearly labelled

Dispatch

6. Lead acid batteries are classified as hazardous waste; therefore they must be accepted and dispatched from site in accordance with the Hazardous Waste Regulations 2005.

7. Hauliers and disposers of lead acid batteries will be approved and suitably permitted to accept lead acid batteries. Where authorised contractors are used to remove lead acid batteries copies of hazardous waste consignment notes will be retained in accordance with the site's Environmental Management Plan.

4.8.2 Acceptance and Storage of Tyres

Tyres will be accepted at site as part of end of life vehicles. When tyres are generated on site (as part of ELV depollution process) and are subsequently stored prior to transfer to a suitably permitted treatment facility the following steps must be taken:

Acceptance

EMR will maintain site acceptance records of all materials accepted at site in accordance with section 7 of the Environmental Management Plan.

Storage

Tyres will be stored in stable stacked stock piles or within appropriate containers on site. Where necessary tyres may be processed to obtain increased storage capacity, this will be achieved by one or more of the following processes: removal of inner wheel rims, cutting / size reduction, shredding or compaction.

Tyres shall be stored either in skip or rollonoff skip containers or shrink wrapped on pallets and 'blocks' of pallets separated by a distance of at least 6 metres from each other or other combustible wastes / flammable materials.

Dispatch

Haulers and disposers of waste tyres must be approved suitably permitted contractors and the receiving facility must also be suitably permitted to accept tyres. Where authorised contractors are used to remove tyres from site, copies of transfer notes will be retained as detailed in as detailed in section 7 of the site's EMP.

4.8.3 WEEE (Waste electrical and electronic equipment) Waste

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

Group A – large domestic appliances (LDA) (washing machines, tumble driers, dishwashers etc) excluding fridges and freezers
Group B – fridges and freezers
Group C – Cathode Ray Tubes (TVs and monitors)
Group D – fluorescent tubes
Group E – small mixed WEEE (SMW) consisting of everything else (lawnmowers, hoovers, PCs, small household appliances, tools etc.)-

Group E wastes are classified as hazardous wastes and must be accompanied as by a hazardous waste consignment note.

- Only group A (large domestic appliances) and E (Small Mixed WEEE) loads can be permitted onto the site.
- Group B waste shall be redirected to designated fridge processing plant and rejected from site.
- Groups C and D shall be rejected at the weighbridge. Although it is accepted that small amounts of these (not whole) may be present in ordinary loads.
- Any loads which weighbridge staff is unsure of will be moved off the weighbridge to be inspected by the Operations manager.
- Any tumble dryers that are accepted on to site which are identified as containing F gases or condenser fluids will be immediately quarantined and contained in a sealed skip to prevent any contaminant runoff entering the drainage system, and quickly disposed of to another permitted site (normally fridge depollution site).

Items that fall into Group A

1. Loads / items will be inspected to ensure that the load consists only of items that fall under the group A category
2. Loads /items will be graded and accepted as a light iron grade as appropriate.

Items that fall into Group B

Inspect the load to ensure that there are no Group B items; the site is not permitted to accept a fridges and therefore the load / item will be redirected to one of these sites.

Items that fall into Group C, D and E

1. The load will be inspected to ensure that there are no items in the load consisting of Group C, D or E wastes /items.

4.8.4 Acceptance, Storage and Depollution of End of Life Vehicles

The main specified treatment process undertaken on site is the storage and depollution of End of Life Vehicles (ELVs). This is undertaken in line with the End of Life Vehicles directive brought into force in November 2003. Liquids and other hazardous components will be drained or removed from End of Life Vehicles (ELVs) in accordance with the End of life Vehicle regulations (as detailed) before they can be further processed by baling, shearing or shredding (off-site) and eventually turned back into recyclable metals. All storage and depollution will take place on an impermeable surface served by a sealed drainage system.

The End-of-Life Vehicle Regulations 2003, Statutory Instrument No. 2635 regulates the acceptance, storage and depollution of end of life vehicles.

Storage Areas

Storage and treatment areas will be engineered with appropriate, impervious surfaces and provided with appropriate equipment for the treatment of water (including rainwater) through diversion via a full retention interceptor to the appropriately permitted final discharge point.

The treatment of waste motor vehicles shall only be carried out in area of the site which has the following (see attached site H&S plan for location of ELV treatment area):

- Areas engineered with impervious surfaces to protect the underlying ground and groundwater and provided with spillage collection facilities.

- Areas provided with storage facilities that are appropriate for dismantled spare parts, including impervious storage facilities for spare parts that are contaminated with oil.

- Areas provided with containers that are appropriate for the storage of materials removed from vehicles where separation is required, i.e. batteries;

- Areas provided with suitable storage tanks used for the appropriate storage of any fluid from a waste motor vehicle;

- Areas for the storage of used tyres without excessive stockpiling, and minimising any risk of fire.

Treatment Operations - Treatment operations for the depollution of end of life vehicles (ELVs):

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

- the removal of the battery or batteries;

- the removal of the liquefied petroleum gas tank (if applicable);

- the removal or neutralisation of all potentially explosive components (including air bags and seat belt tensioners) through deployment;

- the removal, collection and storage of operating fluids and which will include:

    - Petrol or Diesel
    - Engine Oil

  - Brake fluid
  - Windscreen wash water / antifreeze mix (ethylene glycol)
  - Shock absorber oil
  - Air conditioning gases (where applicable)

- the removal of any components identified as containing mercury or asbestos
- Lead weights
- Tyres
- Catalysts

Where any articles or material are removed from ELVs it will be done in such a way as to best promote recycling.

(See Appendix 4 for ELV Acceptance flow diagram and relevant SWPs – ELV depollution)

4.9 Construction work and civil engineering activities.
Any civil engineering contractors to be appointed for work on site will be an approved contractor listed on the EMR Approved Contractor Database. Any contractor not on the EMR Approved Contractor Database will be required to complete the H05-01 Contractor Approval Questionnaire before they can be authorised to complete any work.

The site General Manager will ensure that the contractor site supervision is adequate, that adequate plant maintenance and statutory inspections are up to date, suitable and sufficient risk assessments and safe systems of work (RAMS) have been developed and incorporated into any method statements and any additional necessary EMR Safe Work Procedures (SWPs) and validated by a Competent Person prior to the commencement of the work.

Should any situation arise during the work that is not covered by the risk assessment or method statement, the General Manager will ensure that the Contractor reviews the situation and the risk assessment and method statement will be updated accordingly.

Instructions and training will be provided to the operatives accordingly prior to the recommencement of the work with the use Permit- to work as and when required.

Civil engineering works will be clearly demarcated on site (e.g. with Heras fencing erected and signage posted) and contractors on site are responsible for good housekeeping, compliant storage, carriage and disposal of non-hazardous and hazardous wastes that they generate.

Contractors will ensure that they operate within the confines of the environmental permit and do not cause any environmental nuisance (e.g. excessive noise, mud and dust on road) but the General Manager is ultimately responsible for all contractors on

site and daily monitoring and recording contractors on site (in site diary) will be performed.

Section 5 Pollution control, monitoring and reporting

5.1 Monitoring and reporting for gases, vapours and aerosols

The typical operation and handling of waste material and processed metals on the site is not considered to give rise to emissions of specific gases, vapours or aerosols at such levels or concentrations that there is a measurable risk of pollution of the environment or human health, outside of the site boundary (Silvertown is a metal recycling 'feeder' site and not a shredder / fragmentiser site). Although it is accepted that smaller amounts of fumes and gases are emitted in the exhausts of site mobile plant and transport fleet vehicles, customers' vehicles etc.

However if a potential environmental issue is identified, linked to emissions of specific gases, vapours or aerosols at such levels or concentrations that could pose a risk of pollution of the environment or human health outside of the site boundary then appropriate steps will be taken by EMR to monitor these emissions.

5.2 Groundwater monitoring and reporting systems

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

However if a potential environmental issue is identified that may potentially effect the underlying groundwater then appropriate steps may be taken by EMR to monitor ground water under the site were possible.

5.3 Surface water monitoring and reporting

The typical operation and handling of waste material and processed metals on the site is not considered to pose a significant risk to surface waters due to the nature of the materials handled on site and the engineering and operational containment systems in place on site. The site also discharges to sewer and there are no surface water sensitive receptors in the immediate vicinity of the site (the River Thames is > 200m south of the site).

However if a potential environmental issue is identified, that may potentially effect the surrounding surface waters then appropriate steps may be taken by EMR to monitor at a number of appropriate points around the site.

5.4 Monitoring of Meteorological Conditions

Weather conditions will be monitored based on visual observation and monitoring of weather reports which can be obtained from the Met office webs site and will be relied upon to give an indication of pending storm events that may effect the sites operation.

Records will be maintained in the site diary of any meteorological conditions that adversely effect the sites operation. Weather conditions (temperature, wind speed & direction) will be reported daily in the site diary / log.

5.5 Site Diary / log

A site diary / log will be maintained at the site and used to record daily events and any incidents, complaints or environmental occurrences. This will include:

- Machine breakdowns, plant repairs etc.
- Construction work
- Excessive dust or noise detected at site boundaries
- Daily Met office weather details recorded on site diary / log (e.g. wind speed / direction)
- Damage to fencing, plant, hydraulics etc.
- Emergencies (including fire and flooding)
- Daily fire watches completed
- Problems with waste received and action taken (e.g. asbestos in load)
- Results pest control inspections and measures taken
- Complaints received and action taken
- Non compliant wastes (as specified in the Environmental Permit)
- Any major spillages
- Flooding / ponding
- Date of interceptor clearance
- Radiation detected on loads
- Environmental issues and action taken
- Technically competent management attendance on site: date and time onto and off site.
- Inspections by the Environment Agency / other regulators

5.6 Fire Prevention Plan (FPP)

A Fire Prevention Plan (FPP) will be written and implemented for the site (as required by the Environment Agency) in accordance with Environment Agency Fire Prevention Guidance, this will form part of the Health, Safety and Environmental (SHE) Management system (See Fire Prevention Plan or FPP).

Section 6: Emissions, Amenity Management and Control

6.1 Control, Monitoring & Reporting of Dust and Particulates (Emissions)

Regular inspections will be undertaken throughout the working day by the site management and any potential dust problems identified. Potential problems may include unfavourable weather, such as windy, dry or sunny conditions and direction of prevailing winds which may result dust generation. Weather details, including wind speed and direction must be taken from the Met office website (for Silvertown) and recorded on site diary / log at the beginning of each day. If dust is assessed to be an issue the site manager will monitor the situation closely and take appropriate mitigating actions including use of water hoses and spays.

Dust suppression measures will also be supported by management and control of waste acceptance and processing operations e.g. loads containing high levels of dust and dust generating materials (such as soil and building rubble) will be rejected or the customer will be fined (e.g. £200- 400 per for second offence), if the load has been tipped.

Dust monitoring on site will be undertaken by both qualitative (visual basis at times when the risk of dust release is perceived to be possible, recorded in site diary) and potentially quantitative assessment. Any complaints from neighbours will be investigated. Where appropriate further quantitative methods of dust monitoring will be used if a problem is persisting or perceived to be continuing or in the case where the cause of dust needs to be established such as dusts being generated by off site sources or other abnormal occurrences. Any observable dust events (internally and externally) are monitored and recorded daily.

In the event that complaints are received relating to dust on site, details of the probable and potential causes, investigative measures will be taken and any results will be recorded on an Event log and the site diary / log depending on the seriousness of the compliant and the results of any associated investigations. (EPP4.4)

6.2 Control of odours

The types of materials that will be received and processed at the site are not likely to result in the significant generation of odours. In the event that complaints are received relating to odours on site, the potential cause shall be investigated with details and the results of any investigations recorded Evotix Event Log and the site diary /log. Any waste materials containing non-permitted waste such as putrescible wastes (e.g. scrap metal load contaminated with kitchen waste) will be rejected at the gate, recorded in the site diary log and a Evotix Event log raised.

6.3 Control and monitoring of environmental noise

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

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

Any noise complaints received will be recorded and investigated, with results being retained in the companies' central environmental files or the sites Environmental Files and / or the site diary (EPP4.3, 4.6).

[See Noise Management Plan (NMP)].

6.4 Control of pest infestations

In the event that pests or vermin are discovered on site that are assessed to be posing a threat to the environment, safety or amenity then a specialist pest control contractor shall be appointed as soon as possible. The attendance of the contractor will be recorded in the site diary (EPP4.1).

6.5 Control of litter

The boundaries of the site will be inspected on a daily basis and any litter present will be collected by the end of the working day. Incoming loads will be inspected (as part of waste acceptance procedures) to ensure that no loads containing rubbish or litter are accepted on to the site (EPP4.2).

6.6 General Amenity and Removal of Residues

The site is situated in the Beckton industrial estate but close to the (northern boundary) of the River Thames (although located immediately surrounded by industrial facilities and 5.2km south- east of London City Airport and 250m south of residential housing / flats.

Waste ('cargo bottoms' or 'dirt') generated from waste processing destined for landfill will be segregated and stored in a designated area prior to disposal. For any waste destined for landfill, only approved waste contractors will be used and the appropriate

duty of care documentation completed, on transfer of the waste to a permitted facility (EPP2.9).

6.7 Pollution Control

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

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

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

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

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

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

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

[*See Emergency Plan; EPP 5.2 Spill Response]*

Section 7 - Site records

7.1 Security and availability of records

EMR will maintain site records at the locations specified in section 7.2, Table 4. These locations shall be deemed to meet the agencies requirements in that they will be within easy daily/routine access of the Agency Area office for the site.

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

7.2 Records of waste movements

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

Table 4 Retention and availability of records

Records	Location	Retention Time Period
Weighbridge tickets	On site	6 years
Incoming hazardous waste consignment notes	On site	6 years
Out going consignment notes and transfer notes from servicing contractors removing contaminated liquids, absorbents and waste oils	On site	6 years
Electronic Records	Head Office (Warrington) Server – with national access for any authorised site and user.	Electronic records commenced in 1999 long term retention time scales are yet to be established (anticipated to be a minimum of 10 years).

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

7.3 Evotix Event Log (and site Diary /log)

Environmental incidents, occurrences, breaches of permit etc. shall be recorded on the electronic SHE Evotix Event Log with any actions generated completed by the deadline date. If the date is passed and the action not completed then this will go red and appear on the weekly report to senior management.

The site diary / log will also maintained (see 5.5 above for details) in the site weighbridge office and shall be maintained by the site manager or those operatives which the manager delegates its maintenance to. Other similar documents and information recording systems may also be maintained.

7.4 Periodic Reporting of Environmental Performance

The site will make quarterly tonnage returns to the Environment Agency detailing its inwards and outwards waste movements by EWC code in an electronic format.

EMR will centrally manage the reporting of hazardous waste returns quarterly to the Environment Agency via its Hazardous Waste Team, the current electronic reporting address for this information is hazwastereturn@environment-agency.gov. Hard copies of the quarterly hazardous waste returns will also be retained in either the companies' central environmental files and / or the sites environmental files.

7.5 Additional Records, Safe Working Procedures, Risk Assessments and Emergency Procedures

In addition to the statements and procedures detailed with this EMP the site may also implement and retain additional safe working procedures, risk assessments and emergency plans within their Environmental (Green Files) and Health and Safety files which are updated on a reactive basis linked to relevant operating issues. These procedures will be made available for confidential viewing to regulators upon request and form an important and relevant part of the sites operational procedures and practices in addition to this EMP.

Section 8 Environmental Management System

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

The EMS for the site will comprise of an environmental policy, the environmental management plan (formerly Environmental Management Plan) for the site, planned environmental risk assessments, environmental procedures (EPPs), environmental auditing, planning and review, emergency plan, environmental training and environmental reporting (SHE Action Log and Event Logs). The EMS also forms part of an electronic IMS (Integrated Management System).

The EMR Silvertown site's Environmental Management System has now been certified to the ISO14001 standard, in addition to ISO9001 (QMS), ISO45001 (H&SMS) and ISO50001 (EnMS) as part of an Integrated Management System (IMS).

8.1 Environmental Policy

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

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

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

8.2 Environmental Risk Assessments and Procedures

Planned environmental risk assessments will be conducted at the site to identify significant environmental impacts and risks and these will be translated into procedures as appropriate; environmental protection procedures (EPPS) will be written and appropriate training given to staff in the implementation of these procedures.

The core EPPs implemented on site (applicable to most of EMRs metal recycling and ELV depollution sites are listed in Appendix.

These EPPs will be controlled and supplemented with generation of further EPPs (site specific or otherwise) to be implemented and controlled as part of the environmental management system plan or as and when required.

8.3 Environmental management training

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

The operations manager will be technically competent or will undergo the requisite WAMITAB / NVQ training (or equivalent) or be scheduled to attend the relevant course.

8.4 Environmental Auditing

The site will undergo a full Environmental Audit at least once per year, led by the Regional Environmental Manager, recorded and reported and actions generated on to the Evotix electronic SHE management system. This may be occasionally supplemented by an audit conducted by the EMR group auditing team.

References:

Environment Agency – Environment Agency guidance: 'How to comply with your environmental permit' (formerly Environmental Management Plan Guidance)

Environment Agency - Technical Guidance WM3, Interpretation of the definition and classification of hazardous waste.

Appendix 1 – Environmental Protection Procedures (EPPs)

Reference	Title
Waste Acceptance	
EPP 1.1	The Duty of Care - Acceptance of incoming material
EPP 1.2	Inspection of Incoming Materials
EPP 1.3	Identification of Hazardous Waste
EPP 1.4	Completion of hazardous waste consignment notes
EPP 1.4a	Completion of special waste consignment notes (Scotland)
EPP 1.5	ELV Acceptance
EPP 1.6	Identification of Radioactive Items
EPP 1.7	Identification of Potential Explosive Items
EPP 1.8	Rejection of Material
EPP 1.9	WEEE & Refrigerator Acceptance
EPP 1.10	Duty of Care - Waste Removals
EPP 1.11	Battery Acceptance
EPP 1.12	Steel Can Waste Acceptance
EPP 1.13	Catalytic Converters
EPP 1.14	Inspection of Baled Materials
EPP 1.15	Radioactive Item Disposal
EPP-1.16	Duty of Care – Disposal of Soil & Dirt
Storage of Potentially Polluting Materials	
EPP 2.1	Storage of ELV
EPP 2.2	Storage of Oils & Fuels
EPP 2.3	Storage of Batteries
EPP 2.4	Storage of Engines
EPP 2.5	Storage of Turnings
EPP 2.6	Storage of Gas Cylinders
EPP 2.7	Storage of Scrap Metal
EPP 2.8	Storage of Fragmentiser Waste
EPP 2.9	Storage of Waste Tyres
EPP 2.10	Storage of WEEE

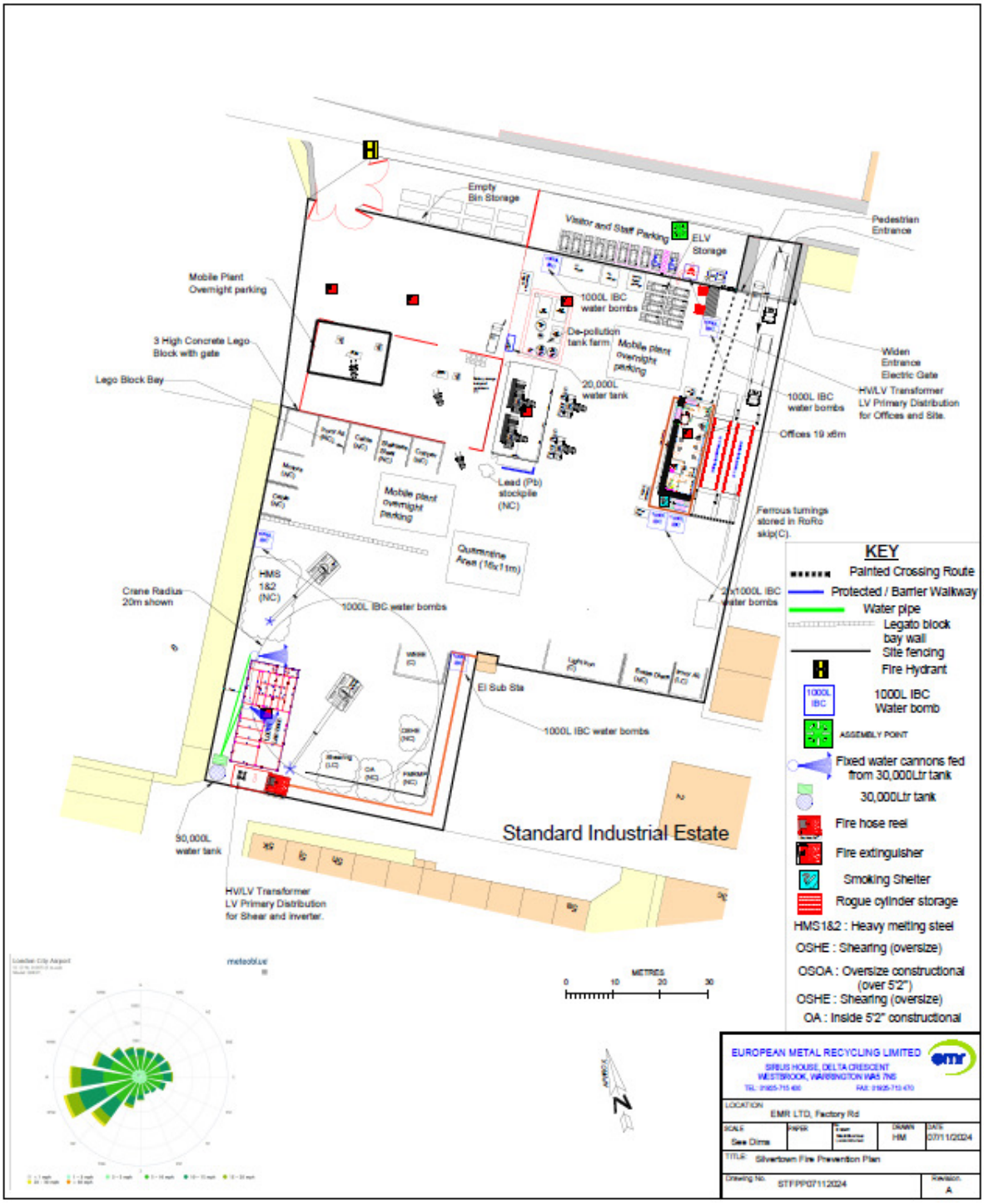
Reference	Title
EPP 2.11	Storage of Putrescible Waste
EPP 2.12	Storage of Radioactive Items
Infrastructure Requirements & Maintenance	
EPP 3.1	Interceptor Inspection and Maintenance
EPP 3.2	Bund Inspection and Maintenance
EPP 3.3	Sump Inspection and Maintenance
EPP 3.4	Taking Water Samples
EPP 3.5	Management & Control of drainage & surface water discharge
EPP 3.6	Water Discharge Failure of Effluent Treatment Plant (YBNF)
EPP 3.6-01	Daily Waste Water Testing Schedule (YBNF)
EPP 3.7	Infrastructure – Taking Soil Samples
Nuisance	
EPP 4.1	Pest Control
EPP 4.2	Litter Control
EPP 4.3	Noise Control
EPP 4.3b	Noise Control (Bedford)
EPP 4.4	Mud and Dust Control
EPP 4.5	Odour Control
EPP 4.6	Vibrations
EPP 4.7	Explosions
EPP 4.8	Fly control
EPP 4.9	Light Pollution
EPP 4.10	Management and Control of Invasive Species
EPP 4.11	General Housekeeping
Environmental Occurrences	
EPP 5.1	Fire Prevention & Response
EPP 5.2	Spill Response
EPP 5.3	Hazardous Substance Deliveries
EPP 5.4	Fuel Tank Checks (YOLD)

Reference	Title
Operations	
EPP 6.1	ELV Depollution
EPP 6.2	Fragmentiser Operation
EPP 6.3	Production Burning
EPP 6.4	Shear and Baler Operation
EPP 6.5	Weighbridge
EPP 6.6	Contractors
EPP 6.7	Trommel Operation
EPP 6.8	Ship loading and Despatch
EPP 6.9	Plastics processing and storage
EPP 6.10	Train Loading and Dispatch
EPP 6.11	Drivers
EPP 6.12	Mobile Baler
EPP 6.13	Factory Contract
Other	
EPP 7.1	Environmental Permit
EPP 7.2	Exporting of Material
EPP 7.3	Office Activities (YCEN)
EPP 7.4	Energy and Resource Efficiency Monitoring (YOLD)
Fridge Plant	
EPP 8.1	Refrigeration Unit Unloading (DARFDG)
EPP 8.1	Fridge Unit Acceptance and Unloading (WILFRG)
EPP 8.2	Refrigeration Unit Treatment (DARFDG)
EPP 8.2	Refrigeration Unit Treatment (WILFRG)
EPP 8.3	Fridge Plant Storage (DARFDG)
EPP 8.3	Fridge Plant Storage(WILFRG)
EPP 8.4	Fridge Compressor Checks (DARFDG)
EPP 8.5	Fridge Plant Monitoring (DARFDG)
EPP 8.5	Fridge Plant Monitoring (WILFRG)

Appendix 2 – Site Diary /log

Site Location/Name:					**Date of report:**		
Technically Competent Manager Name:							
Time In:					**Time Out:**		
Check Items		***Circle as applicable***			**Comments/Issues**		
1	Any non-permitted waste?	Y	N	n/a	*Describe:*		
2	Is dust / mud leaving site?	Y	N	n/a	*Describe:*		
3	Is there excessive noise/vibration?	Y	N	n/a	*Describe:*		
4	Is there a strong odour on site?	Y	N	n/a	*Describe:*		
5	Are security measures fully operational? (gates, fences/walls, locks, CCTV etc.)	Y	N	n/a			
6	Is pest control in place?	Y	N	n/a			
7	Any smoke/dust generated on site?	Y	N	n/a	*Describe:*		
8	Are radiation detectors functioning?	Y	N	n/a			
9	Any significant maintenance/construction work in progress?	Y	N	n/a	*Describe:*		
10	H&S and Env. signage in place?	Y	N	n/a			
11	Traffic routes clear of debris?	Y	N	n/a			
12	Loading/Unloading/Tipping areas suitable? *(ground condition, gradient, weather conditions etc.)*	Y	N	n/a	*Describe:*		
13	Vehicle and pedestrian circulate in a safe manner; pedestrian walkways and crossings in good condition and pedestrians wearing high-vis, safety helmet & correct PPE?						
14	Process plant operating?				**Machine Name**	**Start**	**Finish**
		Y	N	n/a			
		Y	N	n/a			
		Y	N	n/a			
15	All emergency exits clear?	Y	N	n/a			
16	Dust curtain/netting intact?	Y	N	n/a			
17	Any plant/equipment breakdown?	Y	N	n/a	*Describe:*		
18	Housekeeping / litter controlled?	Y	N	n/a	*Describe:*		
19	Spillages cleared up?	Y	N	n/a			
20	Any complaints received?	Y	N	n/a			
21	Bunded Storage sound & secure? (ELV, Derv/Gas Oil, Drums, Turnings, Engines etc)	Y	N	n/a			
22	Dust suppression in use?	Y	N	n/a	*Describe:*		
23	Fire Fighting equipment operational?	Y	N	n/a			
24	Fire watch / checks completed?	Y	N	n/a	*Describe:*		
25	Discharge point running clear?	Y	N	n/a			
26	Gullies, drains, interceptor inspected?	Y	N	n/a			
27	Site free from flooding/ponding?	Y	N	n/a			
28	Any Waste rejected from site	Y	N	n/a			
29	Batteries stored correctly? (Ref. EPP 2.3)	Y	N	n/a			
30	*Other Issues to note (e.g. external activities potentially causing a nuisance/impact):*						

Appendix 3 – Site Plan



Appendix 4 – ELV Depollution