



## **EUROPEAN METAL RECYCLING LIMITED**

### **EMR SILVERTOWN**

### **ENVIRONMENTAL MANAGEMENT PLAN**

**Permit No: EPR/WE1242AA**

Unit 6, Factory Road  
Silvertown,  
London E16 2EJ

March 2023

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## 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).

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 current Standard Rules permit and are also outlined below:

<b>Table 2.1 activities</b>	
<b>Description of activities</b>	<b>Limits of activities</b>
<b>R13:</b> Storage of wastes pending any of the operations numbered R1 to R12 (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.
<b>R3:</b> Recycling/reclamation of organic substances which are not used as solvents	There shall be no treatment of WEEE containing ozone depleting substances.
<b>R4:</b> Recycling/reclamation of metals and metal compounds	There shall be no treatment of batteries except for sorting.
<b>R5:</b> Recycling/reclamation of other inorganic materials	There shall be no mechanical treatment of cooling equipment or display equipment.
<b>D15:</b> Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	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 currently accepted at the Silvertown site are listed in Table 2 as follows:

<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>
<b>02 01</b>	<b>Waste from agriculture, horticulture, aquaculture forestry, hunting and fishing</b>
02 01 10	Waste metal
<b>12</b>	<b>WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS</b>
<b>12 01</b>	<b>Wastes from shaping and physical and mechanical surface treatment of metals and plastics</b>
12 01 01	Ferrous metal filings and turnings
12 01 03	Non-ferrous metal filings and turnings
<b>15</b>	<b>WASTE PACKAGING, ABSORBENTS, FILTER MATERIALS, WIPING CLOTHS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>
<b>15 01</b>	<b>Packaging (including separately collected municipal packaging waste)</b>
15 01 04	Metallic packaging
<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>
<b>16 01</b>	<b>End-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</b>
16 01 06	End-of-life vehicles containing neither liquids nor hazardous components
16 01 17	Ferrous metal
16 01 18	Non-ferrous metal
16 01 21*	Hazardous vehicle components – catalytic converters containing RCF matting
16 01 22	Discarded components not otherwise specified
<b>16 06</b>	<b>Batteries and accumulators</b>
16 06 01*	Lead batteries
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 04</b>	<b>Metals (including their alloys)</b>
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed Metals
17 04 10*	Cables containing oil, coal tar and other substances
17 04 11	Cables other than those mentioned in 17 04 10
<b>17 09</b>	<b>Metals (including their alloys)</b>
17 09 04	Other construction and demolition waste

The List of Waste (LoW) codes required for the ELV activities (as proposed in bespoke permit –currently as an application with the Environment Agency) and which are identical to those listed in the Standard Rules SR2015 No.13 (Vehicles Storage Depollution & Dismantling (authorised treatment facility):

<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>
<b>16 01</b>	<b>End-of-life vehicles from different means of transport...</b>
16 01 03	End-of-life tyres
16 01 04*	End-of-life vehicles
16 01 06	End-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 21*	Hazardous vehicle components – catalytic converters containing RCF matting
16 01 22	Catalytic converters not containing RCF matting
<b>16 06</b>	<b>Batteries and accumulators</b>
16 06 01*	Lead batteries
16 06 05	Other batteries and accumulators

The List of Waste (LoW) codes required for the WEEE activities (in bespoke permit – currently as an application with the Environment Agency) are listed as follows below:

<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>
<b>16 02</b>	<b>Wastes from electrical and electronic equipment</b>
16 02 13*	Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	Hazardous components removed from discarded equipment
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20 01</b>	<b>Separately collected fractions (except 15 01)</b>
20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

### 1.3 Hours of operation

Normal Operating Hours:

Mon- Fri	07.00 – 17:00
Sat	07.00 – 12:00
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. depot manager) will undergo WAMITAB / NVQ training (or equivalent). At the time of writing, the TCM (Technically Competent Manager) 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 Depot 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 depot 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 (ferrous and non-ferrous metals) waste, prior to processing will be undertaken on an impermeable concrete 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 Pli-astic 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 full retention, 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 or planned within 7 working days. Inspections, defects, damage and repairs will be recorded in the site diary and on an Event Log.

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

#### **2.1.4 Maintenance Schedules**

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

Drainage systems including gullies, drains, drain covers, bunds and interceptors will be inspected on a regular basis (usually daily or weekly, as part of the manager's daily walk-rounds) and will be emptied (as required) by an authorised and licensed contractor in accordance with the manufacturer's recommendations.

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

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.

Lighting will be installed in a manner that mitigates against any potential light pollution (e.g. use of directional lighting). 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.

## **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 site's main access roads, therefore mud (and other debris) is unlikely to be tracked onto the road from inside the site. In addition to the provision of impermeable site surfaces the site has contracted mobile sweepers provided to remove any residue and 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.

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

### **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. The spillage shall be cleaned up immediately using absorbent materials, booms and drain blocks and the contaminated absorbent material placed in sealed containers; if any polluting substances leave 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 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 Assure 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 Silvertown site **Fire Prevention Plan** or FPP for full 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 material and items 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 waste materials be observed at this point, contrary items are returned to the vehicle and rejected from site or quarantined for further instruction by the depot 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 their 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 an 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.

The standard waste sampling protocol (taken from EMR's Waste Management Guidance document) is as follows:

***Sampling Procedure***

To take a representative sample of waste, follow these steps:

- Identify the waste and determine its source, properties, and intended destination.
- Determine the sample size based on the amount of waste generated and fraction size
- Collect the sample using appropriate equipment and techniques.
- Label and store the sample with the waste stream description, date and time of sampling, and sample location.

The waste sampling protocol is normally conducted to provide a representative waste sample for laboratory analysis (at approved and accredited labs) to facilitate the characterisation and classification of any new wastes.

**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 (currently Avery) 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 (ELVs)**

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.

Undepolluted ELVs will not be stored greater than 2 cars high or 2 cars in width (as stipulated by the site FPP).

##### **Treatment operations for the depollution of waste motor 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;
- 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 (ethylene glycol) mix
  - 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 will be removed and segregated where present in order to promote to facilitate this:

- The catalyst or catalysts (hazardous waste);
- The tyres;
- Either during shredding & separation downstream or otherwise: large plastic components;
- Either during shredding & separation 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 Appendix for ELV depollution process flow diagram.

*[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 batteries 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 plastic containers (e.g. Dolavs) in a storage area with an impervious floor.
2. Neutralising materials, liquids or absorbent granules will be maintained on site for use in the 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 however they may also be received from other sources in accordance with waste acceptance and control procedures. When tyres are received or generated on site 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) includes washing machines, tumble driers, dishwashers etc. (excludes 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 domestic appliances - excluding TV/PC monitors) loads will be permitted onto the site (consisting of partially or entirely of Group A or Group E waste (WEEE waste))
- Group B waste shall be redirected to designated fridge processing plant and rejected from site
- Groups C and D shall be rejected from site at the weighbridge. Although it is accepted that small amounts of these (not whole) may be present in some ordinary loads.
- If any Group B, C and D wastes are encountered after off-loading / tipping then these wastes will be transferred to the quarantine area for transfer off-site to a suitably permitted and approved treatment facility.

- Any loads which the WBO is unsure of will be moved off the weighbridge to be inspected by the Depot 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.

Only in certain circumstances will WEEE waste be accepted on to the Silvertown site and this will most likely be large domestic appliances or LDA (e.g. washing machine) or small mixed WEEE (hazardous waste).

#### **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 must 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 must 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) must be performed.

## Section 5 Pollution control, monitoring and reporting

### 5.1 Pollution Control

Spill kits, 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 interceptor and 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
5. Contain on or in the watercourse (e.g. using booms)- *least preferred response*

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]

## **5.2 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. 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.

## **5.3 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.

## **5.4 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.

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.

### **5.5 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 meteorological conditions that adversely effect the sites operation. Weather conditions (temperature, wind speed & direction) will be reported daily in the site diary / log and copy of the Metoffice weather details will be printed out daily and kept on record.

### **5.6 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

### **5.7 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 EMR Silvertown Fire Prevention Plan).

## **Section 6: Emissions, Amenity Management and Monitoring**

### **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 sprays.

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 (£200- 400 per load), 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 complaint and the results of any associated investigations (EPP4.4).

(See Silvertown site Dust Emissions Management Plan or DEMP).

### **6.2 Control of odours**

The types of waste materials (metals) that will normally 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 on an 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 canteen waste) will be rejected at the gate, recorded in the site diary log and an incident 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).

### **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 will be appointed as soon as possible (in actuality most UK EMR depots contract pest controllers as a matter of course).

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 350m 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 Climate Change Mitigation**

An Environmental Risk Assessment was conducted in May 2023 looking at Climate change effects and how this may affect metal recycling operations and the general management of the EMR Silvertown site. The following risks were identified so that plans can be formulated to mitigate, as far as reasonably practicable, the full effects of climate change these included:

- Increased summer daily maximum temperature: Potential for increased waste reactions and fires involving: heat sensitive or combustible waste oil, contaminated swarf, frag light fractions, oily rags.
- Increased summer daily maximum temperature: Dry vegetation in and around hot cutting areas, leading to potential increased fire risk.
- Increased summer daily maximum temperature: Potential increase in high temperature expansion and stress of plant, pipework and fittings. - increased noise, dust, accidents etc.
- Increased summer daily maximum temperature: Potential increased dust emissions from processing areas and site roads
- Increased summer daily maximum temperature: Stockpiled metal food and drink containers attracting pests and odours.
- Winter daily maximum temperature: Increased risk of pipework freezing; could cause downtime, exceed waste storage, start-up noise and accidents.
- Daily extreme rainfall: Potential for increased site surface water and flooding resulting in drainage systems and interceptors being overwhelmed and contamination leaving the site.
- Average winter rainfall: Potential for increased site surface water and flooding; contamination leaving the site.
- Average winter rainfall: Potential for drainage systems and interceptors to be overwhelmed; contamination leaving the site.
- Sea level rise.

- Drier summers: Potential increase in dust emissions from a site.
- Drier summers: Potential increased use and reliance on mains water for dust suppression, cleaning and fire water.
- River flow: potential increased impact of discharge to watercourse from on-site drainage systems where connected to water courses.
- River flow: Increased risk of watercourse flows being too high to allow discharge and drainage backing up on site.

Some mitigation measures have already been implemented (e.g. dust suppression measures) and others have been planned but yet to be implemented on site.

## 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	On site	6 years

removing contaminated liquids, absorbents and waste oils		
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 Incident Event Log (and site Diary /log)**

Environmental incidents, occurrences, breaches of permit etc. shall be recorded on the electronic SHE (Assure©) Event Log with any action logs generated must be completed by the deadline date. If the date is passed and the action has not been completed then this will flag red and appear on the electronic weekly report viewed by 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](mailto: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 management system.

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) operated as Trade 2.

### **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 depot 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 depot 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 electronic SHE management system. This may be occasionally supplemented by an audit conducted by the EMR group auditing team.

### **8.5 Integrated Management System (IMS) - ISO14001, ISO45001 and ISO9001.**

All UK EMR depots possess an Integrated Management System which has been audited and accredited to ISO14001, ISO45001 and ISO9001 management systems by LRQA.

EMR Silvertown is included in the regular ISO /IMS audit cycle of internal and external (LRQA) audits.

**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
<b>Waste Acceptance</b>	
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
<b>Storage of Potentially Polluting Materials</b>	
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

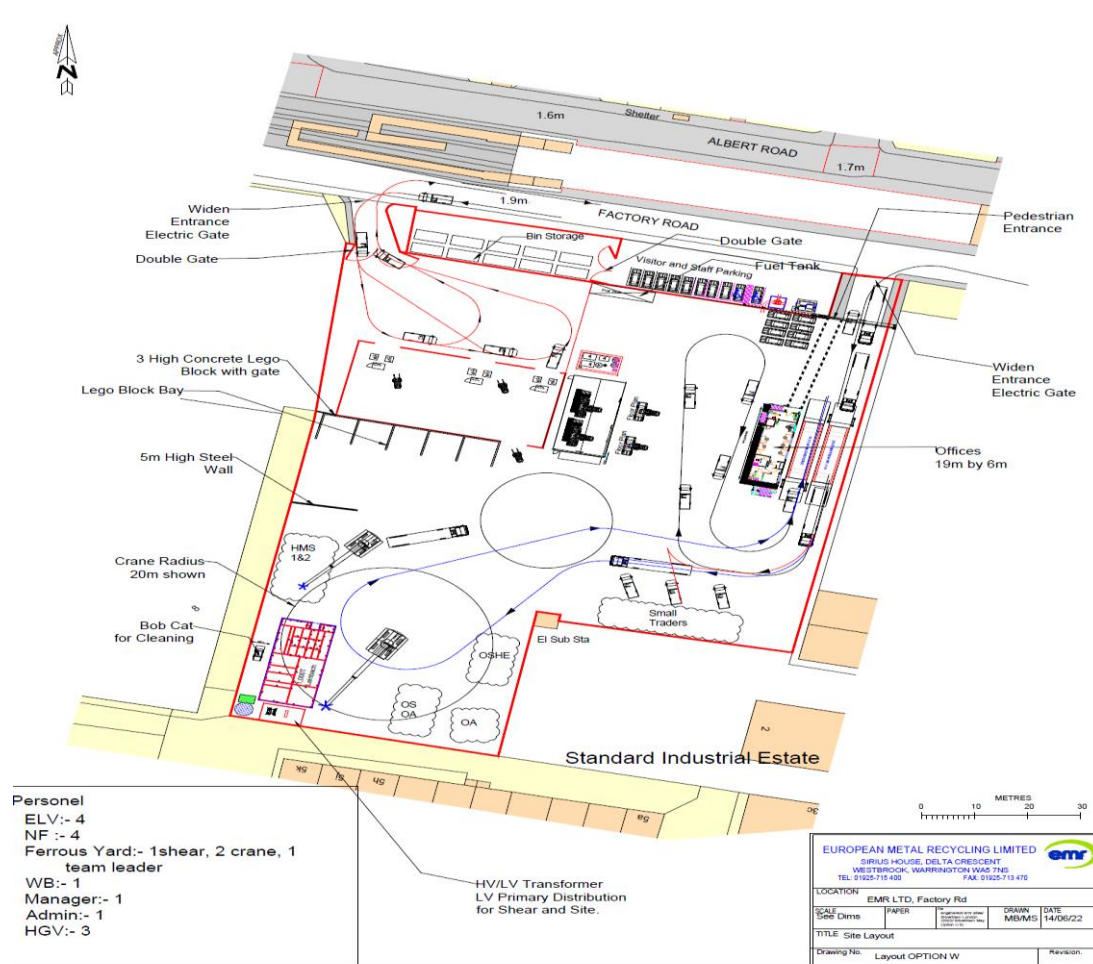
Reference	Title
EPP 2.11	Storage of Putrescible Waste
EPP 2.12	Storage of Radioactive Items
<b>Infrastructure Requirements &amp; Maintenance</b>	
EPP 3.1	Interceptor Inspection and Maintenance
EPP 3.2	Bund Inspection and Maintenance
EPP 3.3	Sump Inspection and Maintenance
EPP 3.4	Taking Water Samples
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
<b>Nuisance</b>	
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
<b>Environmental Occurrences</b>	
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
<b>Operations</b>	
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
<b>Other</b>	
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)
<b>Fridge Plant</b>	
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

<b>Site Location/Name:</b>		Sivertown			<b>Date of report:</b>				
<b>Technically Competent Manager Name:</b>									
<b>Time In:</b>					<b>Time Out:</b>				
<b>Check Items</b>				<b>Circle as applicable</b>		<b>Comments/Issues</b>			
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?						<b>Machine Name</b>	<b>Start</b>	<b>Finish</b>
		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

End of Life Vehicle (Waste) compliance process		V2.0
H47-10	SHEQ	
April 2022		

