

Section 1 - General			
Q	Relevance	Comment	Response
N/a	Site permit and non-technical summary details.	No comments from Environment Agency	N/a – details provided in NTS (Non-Technical Summary) and Environmental Management Plan provided in original submission.
Section 2 - Best available techniques (BAT) and appropriate measures			
Q	Relevance	EA Comment	Response
1	Fire Prevention Plan (FPP)	Site Plan needs to include drainage runs, pollution control features such as drain closure valves and fire water containment systems. Either as part of the site plan or a separate drainage plan.	See – Silv. - Detailed Drainage Plan
2		We require you to provide details of a documented maintenance and inspection programme for static and mobile plant and equipment (e.g. what checks are conducted, who the checks are completed by, how often they will be conducted, how records are kept and what actions are taken in the event that problems are discovered).	<p>The maintenance and inspection plan is encompassed in a number of documents and systems:</p> <ul style="list-style-type: none"> - 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). <p>Records are mostly kept electronically. Any actions required are recorded on action log on CMS system.</p> <p>Details are included in Section 2.1.4 of the Environmental Management Plan (EMP), attached.</p>

3		We require you to confirm details of how regularly you'll inspect and clean the site to prevent the build-up of loose combustible waste, dust and fluff. Inspections should particularly focus on higher risk areas, such as electrical panels and treatment equipment.	Housekeeping is conducted continuously as part of daily, operational staff duties (i.e. at the end of each task or operation). This may be more concerted in the middle and / or the end of the day; this is also recorded in the site diary. Inspections are conducted regularly by competent and authorised electrical contractors (e.g. DJW Ltd, including that of electrical panels. Most electrical panels are also enclosed (and sealed) to prevent ingress of dust, fluff and water. See EPP 4.11- General Housekeeping (attached).
4		Please provide details of how external heating during hot weather will be taken into account and confirm that waste will be shaded from direct sunlight if required and/or any other techniques that will be in place to enable heat generated within the pile to be released.	This is not applicable to scrap metal wastes, as any heat (falling on the surface of a metal stack) is conducted along the mass of metal distributing heat and therefore heat never builds. Also in the unlikely event (in the UK) that metal would get very hot from solar radiation alone, water hoses will be used to cool the material. See FPP - Section 2.3.6. It should also be noted that most scrap metal wastes are non-combustible e.g. copper, steel plate & girders etc. and even combustible metal wastes (e.g. light iron) require very high temperatures to ignite.
5		We require you to confirm that the vehicles will be accessible from at least one side. You have confirmed that they are 2 meters high but not included ELV storage on the site plan so we require ELVs to be included on the site plan showing access from one side.	All stacked ELVs are accessible from more than one side. See FPP- Table 2 Section 2.4.1 See – FPP Site Plan (locations of ELVs)
6		With regards to the quarantine area we need you to provide details of the quarantine area(s) on site. The quarantine area(s) must be within the boundary of the site for which the permit applies and be large enough to hold at least 50% of the volume of the largest pile (or sufficient ELV's or containers to provide separation). Confirm a	The quarantine area of the site (dimensions shown on site plan) during a fire to will be large enough to hold at least 50% of the volume of the largest pile (or ELVs or containers) and a separation distance of 6 metres will be in place away from other combustible wastes and flammable substances.

		<p>separation distance of at least 6 metres around the quarantined waste will be in place.</p> <p>You have indicated that this will be a moveable quarantine area but we need confirmation of the above capacity.</p>	See FPP and Site Plan
7		<p>We need you to provide details of the detection system on site. The detection system should be proportionate to the nature and scale of waste management activities you carry out and the associated risks. For all automated systems the design, installation and maintenance should be covered by an appropriate UKAS-accredited third party certification scheme. If the system is not accredited, provide details as to why not and outline how the system will work on site.</p> <p>You have confirmed that it's thermal imaging detectors but not indicated that you can monitor all waste piles.</p>	<p>The thermal imaging cameras on site are positioned to cover all the operational areas of the site and all waste piles (i.e. where combustible wastes and flammable substances are stored).</p> <p>See Section 2.5 Detection Systems – FPP.</p> <p>See Section 3.4.3 Third Party Certification (UKAS Accreditation) - FPP</p> <p>See Site Plan (CCTV locations).</p>
8		<p>We need you to provide site specific calculations for water supply in accordance with the guidance. You need to account for a worst case scenario, which is defined as your largest waste pile catching fire. As a guide, a water supply of at least 2,000 litres a minute for a minimum of 3 hours is needed to tackle a 300 cubic metre pile of combustible material (this equates to approximately 6.7 litres/minute for every 1m³ of material).</p> <p>You have provided us with the water supply available and also some pile sizes however you have not indicated how many ELVs are to be stored</p>	See section FPP - 3.6.1 Availability of Water.

		on site at any one time. As the guidance states “If you are storing ELVs, you will need to have 1800 litres of water to extinguish each vehicle.”	
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1	Dust Emissions Management Plan (DEMP) V2 (Oct 2024).	Provide greater detail within the text of the document that reflects the names of the managers and their positions within the hierarchy of your organogram.	Names of key managers and other key staff are clearly shown in Figure 1. Organisational chart for EMR Silvertown – FPP. (Site Manager, Depot Manager and Operations Manager are different names for the same role).
2	DEMP v2 (Oct 24).	Provide details of the escalation procedure used if visual monitoring detects signs of dust, or if dust issues are not addressed adequately	See Section 3.4 Visual Dust Monitoring - DEMP v2 (Oct 24).
3	DEMP v2 (Oct 24).	Your site is within an Air Quality Management Area (AQMA). Identify how you will satisfy the aims of Newham Council’s local air quality action plan.	A Turn Key continuous AQM dust monitor will be installed at the North East boundary (encompassing whole site with SW prevailing winds) to measure dust levels on site. Trigger levels will be set, Amber: 70mg/m ³ and Red: 100mg/m ³ which will then inform designated recipients (Operations Manager / SHE Specialist and AGM) and appropriate actions taken e.g. Amber: site actions taken immediately to mitigate the source; Red: Activity ceased, resolution agreed and made and Schedule 5 notification sent to Environment Agency. See Section 4 - DEMP v2 (Oct 24).
4	DEMP v2 (Oct 24).	Provide information regarding monitoring including: a. Details of the location of the nearest air quality monitoring site/s. b. The distance from your site to the monitoring location/s. c. Provide the above information on a plan.	a. to c. - The location of the nearest (public) dust monitor is: Britannia Gate LAQN Monitoring site (grid ref: 540336, 180260), located 3km directly west of the site. The <u>site</u> dust monitor will be located on the north eastern boundary and is shown on the plan.

5	DEMP v2 (Oct 24).	Provide us with a complete version of the DEMF.	Dust Emissions Management Plan (DEMP) has been fully amended and revised. DEMP v2 (Oct 2024) attached.
6	DEMP v2 (Oct 24).	Provide details of all other local contributors of dust emissions, including other industrial sites, using: a. a map to provide the locations of nearby emitters of dust. b. a table which includes distances from your site to these emission sources.	See Appendix 1 – Sensitive Receptors, DEMF v2 (Oct 24) .
7	DEMP v2 (Oct 24). Environmental Management Plan (EMP) (Oct 24) v5	Provide details of the monitoring location used for the wind rose diagram and your site’s similarities and differences, including: a. The local setting b. Topography of the local area. c. Explanation of elevations of the monitoring locations and your site.	See section 4.1 Monitor Location DEMF v2 (Oct 24) . See Section 3.4 Location and Topography - Environmental Management Plan (EMP) (Oct 24) v5
8	DEMP v2 (Oct 24).	Provide us with a revised map of sensitive receptors within 1km of your site, to include: a. A table to demonstrate which sensitive receptors are present. b. The distance from your site to the location of the sensitive receptors. c. Distinct categories of sensitive receptors which may include: commercial, industrial, recreational and amenity sites, schools and other childcare facilities, elderly housing and convalescent facilities, environmental habitats, protected species sites and hospitals, etc.	a, b, c: see Appendix 1 – DEMF v2 (Oct 24) . d: (London City Airport windrose diagram): see Appendix 4 – DEMF v2 (Oct 24) . The site will be installing a dust monitor on the north-eastern boundary of the site. Details of location of monitor - Section 4.1 – DEMF v2 (Oct 24) .

		d. A wind rose diagram, on which your site location in relation to the monitoring site (i.e. London City Airport) should be clearly marked.	
9	Environmental Risk Assessment	Provide a revised source-pathway-receptor table which makes reference to the effects of activities on specific receptors.	[Brendan /David Pocklington]
10	DEMP v2 (Oct 24).	<p>Provide a revised Dust Suppression System Plan which:</p> <ul style="list-style-type: none"> a. Has all the elements clearly identified, including equipment, buildings, waste storage areas, etc. b. Contains a North Arrow. c. Shows which waste (if any) are stored within the “Lego Block Bay”. d. Illustrates which buildings are present on-site. e. Illustrates which activities occur within the buildings. f. Illustrates where all pieces of equipment on-site are located, both when in operation and not. g. Shows the daily visual monitoring locations. h. Shows the pipe which connects the sprinklers and the 30,000 litre tank. i. Shows the arc of coverage of sprinklers and water cannons. j. Shows the location of the dust and particulate monitor/s. 	See DEMP v2 (Oct 24) and Appendix: Site Plan

		k. All dust suppression measures on-site, this may include infrastructure e.g. fencing.	
11	DEMP v2 (Oct 24).	Provide further detail of the entire dust suppression system on-site, including the sprinkler, water cannons, etc.	See DEMP v2 (Oct 24) and Site Plan.
12	DEMP v2 (Oct 24).	Provide details of the other dust suppression measures you utilise in the parts of the site used for traffic and waste activities, which are not currently covered by the reach of the sprinkler and water cannon [Plus note].	All operational parts of site (including traffic and waste activities) are covered by dust suppression (water cannon, sweeper etc.), not sprinkler. Additional dust suppression includes contracted sweeper (frequency 2-3 times per week). Locations are shown on Site Plan and appendix. See DEMP v2 (Oct 24) and Appendix (Site Plan)
13	DEMP v2 (Oct 24).	Provide details of: a. Whether your dust suppression system relies on pumps. b. If applicable, your contingency plans for power failure. c. If applicable, your contingency plans for failure of key parts.	Some of the dust suppression system relies on a pump (e.g. water cannons), some don't and are external to the power supply (e.g. contracted sweepers). If there is a power supply failure then more dusty operations will cease (e.g. movement, loading of any dusty materials such as construction waste or soil) and other methods such as increase in frequency of road sweeper will be used to compensate for lack of pumped water.
14	Environmental Management Plan (EMP) (Oct 24) v5	Include information which demonstrates how waste is transported across the site.	Waste / scrap metals are tipped, unloaded or placed directly into the bays, areas, containers or stillage where they will be stored or treated, to prevent double handling which is costly in terms of time and use of fuel. There is a one way system (as shown in the EMP site plan) and a speed limit on site for all vehicles and mobile plant of 5mph. See Environmental Management Plan (EMP) (Oct 24) v5.
15	DEMP v2 (Oct 24). Environmental Management Plan (EMP) (Oct 24) v5.	Provide details of: a. The location and frequency of jet-washing of vehicles.	Jet washing is limited to mobile plant on site (not road vehicles). As the site is concreted throughout (no compacted soil / unmade ground anywhere on site) and due to the nature of scrap metal wastes, there is little to no mud generated (compared to other types

		<p>b. How the water from this process is managed e.g. contained or cleaned up. How you will verify the effectiveness of this jet-washing.</p>	<p>of wastes e.g. construction wastes) and jet washing is conducted intermittently.</p> <p>The jet washer can be verified as effective as a pre-use check form is completed before every use and defects / repairs required are recorded on the electronic CMS maintenance system, it forms part of a regular maintenance schedule and finally regular statutory checks (PUWER) are made by EMR's insurance engineers (Allianz).</p> <p>See Section 4.1 Mud and Debris - Environmental Management Plan (EMP) (Oct 24) v5.</p>
16	DEMP v2 (Oct 24)	<p>Provide details of how you will prevent dust leaving the site over the boundary walls, namely from open stockpiles.</p> <p>[Plus Note]</p>	<p>This is a typo, the boundary walls are in fact 5m high and there is > 0.5m free-board space between the top of the stockpile and the height of the fence. Additionally due to the nature of the wastes stored (scrap metal), little dust is generated.</p> <p>See Table 3.2 DEMP v2 (Oct 24)</p>
17	DEMP v2 (Oct 24). Environmental Management Plan (EMP) (Oct 24) v5. EPP1.17 Waste Acceptance & Rejection	<p>Provide details of the process of receiving waste on-site.</p> <p>[Plus note]</p>	<p>Waste acceptance & rejection is outlined in more detail in the Environmental Management Plan (EMP) and in the relevant, separate Environmental Protection Procedures (EPPs).</p> <p>Note: there are two site entrances (shown on revised Site Plan in Appendices of EMP, DEMP and FPPs) but the non-ferrous entrance is used mainly by small vehicles (vans etc.), with mostly 'handballed' non-ferrous metals (e.g. copper cables, brass) for off-loading onto the small scales (i.e. no potentially dusty waste materials enter via this entrance).</p> <p>See Section 4.4 - Environmental Management Plan (EMP) (Oct 24) v5.</p> <p>See EPP1.17 Waste Acceptance & Rejection.</p>

18	DEMP v2 (Oct 24).	Provide details on the five-metre steel wall shown in the dust suppression system plan, including function, etc.	The 5m fence steel fence fitted with integral dust netting functions as security (e.g. to prevent intruders, arsonists), prevention of any dust and debris blowing from site.
19	DEMP v2 (Oct 24). Fire Prevention Plan (FPP).	Provide details of: a How the “Lego Block Bays” will be utilised. b The height of these bays. c The planned height of the stockpile to be stored within these bays.	a. “Lego blocks bays” (or more accurately named: Legato blocks) are moveable and can be re-located on site if required. They are utilised to contain waste, act as a fire wall and prevent dust and debris spread. b. The height of the bay walls are 3m. c. Planned height of stockpile within these bays is 2.5m.
20	DEMP v2 (Oct 24).	Provide a copy of the housekeeping schedule for the site, which includes: a. The frequency of use for both manual and automated cleaning systems b. Details of the road sweeper. c. Cleaning inside buildings. d. Cleaning of the yard. e. Cleaning of the site haul road and nearby highways f. Contingency measures for cleaning access roads. [Plus Note].	a. Manual (broom, pan, shovel etc.) and automated (vacuum) cleaning is used throughout the day as required but particularly at the end of the task and end of day. b. Road sweeper: normally Johnston VT80 (or equivalent), dual sweeping for both sides of the road, high performance jetters, 5 tonne waste capacity, high pressure water spray bars, reverse cameras and high pressure hand lance. c. Cleaning inside building frequency is throughout the day as required but particularly at the end of the task or day. d. Road sweeper and manual sweeping (broom, pan, shovel etc.) e. There is no haul road to the site; entrance area is included as part of operational cleaning as above (e.g. road sweeper cleans here also). f. Not applicable (no separate access roads) Note: The yard surface refers to operational areas; ‘surroundings’ refers to other (non-operational) areas e.g. site entrance, car park etc. The site is now concreted throughout (construction has ceased), there is no soil or materials to create mud. The site and main entrance (and non-ferrous entrance) is inspected daily by the Operations Manager; in the unlikely event of mud or debris found at

			<p>the entrance, or off site this is recorded in the site diary and immediate action is taken to clear any litter / debris, if found to be emanating from the site.</p> <p>See EPP 4.1 General Housekeeping.</p>
21	<p>Environmental Management Plan (EMP) (Oct 24) v5. DEMPv2 (Oct 2024)</p>	<p>Quantify how you will decide which loads contain an acceptable amount of dust including: During your waste acceptance procedure.</p> <ul style="list-style-type: none"> a. During your waste acceptance procedure. b. What level of dust would be required to activate the dust management system to dampen down material. <p>You have mentioned transporting trommel fines on page 26, which can be extremely dusty.</p>	<ul style="list-style-type: none"> a. The nature of most ferrous and non-ferrous metals received on site (i.e. contamination by non-metallics < 2 % by wt.), means that there is little or no dust in most incoming loads but there are occasionally dust producing (non-conforming) non-metallic materials as contamination (e.g. concrete, bricks, soil etc.). b. An unacceptable level of dust will take the form of a visual evaluation made by the site Operations Manager but it would also be triggered by the alarm setting of the dust monitor (amber: 75mg/m³ and red: 100mg/m³), which then automatically sends an e mail to relevant persons (including the Operations Manager). <p>See Section 4.4 - Environmental Management Plan (EMP) (Oct 24) v5.</p> <p>There is <u>no trommel</u> and no trommel fines are produced or accepted on site (this section was included in error and has now been removed from revised DEMV).</p>
22	<p>Environmental Management Plan (EMP) (Oct 24) v5.</p>	<p>Provide details to confirm that you will ensure that all vehicles bringing waste on-site will be of an enclosed nature, have waste stored in containers, and/or be covered.</p>	<p>All EMR vehicles possess sheeting and netting to prevent egress of any dust or debris and nearly all 3rd party contactor HGVs now possess these. Much smaller vehicles 3rd party vehicles (such as small flat beds to not possess sheeting or netting but these types of vehicles tend to carry individual (non- dust items) of scrap metal e.g. ovens, washing machines, large lumps of metal, cables etc. Any dusty loads encountered (or more likely loads containing dust producing materials, such as construction waste) will either be rejected at the</p>

			<p>weighbridge or the load quarantined and the customer 'knocked' (fined – penalty cost applied to value of metal).</p> <p>See Section 4.4 - Environmental Management Plan (EMP) (Oct 24) v5.</p>
23	DEMP v2 (Oct 24)	<p>Provide details regarding the circumstances where some or all of the activities on-site would cease due to a failure of your control measures.</p>	<p>If there was to be a power failure during a severe drought (and dust suppression using water cannons etc.) then dusty activities and operations would cease e.g. loading of HGV vehicle with the bottom of a shearing pile.</p> <p>See Section 3.3 - DEMP v2 (Oct 24)</p>
24	DEMP v2 (Oct 24)	<p>Detail how employees on-site can raise concerns over dust emissions on-site, and how this will be acted upon.</p> <p>[Plus Note]</p>	<p>Employees (site operatives) can raise concerns over dust emissions via a number of routes, which includes:</p> <ul style="list-style-type: none"> - the use of two way radios (issued to all operational staff), - 'Huddles' - operational management and staff: two-way, discussion, stand up meetings first thing in the morning to discuss SHEQ matters, SHEQ highlights and actions required - Rolling SHEQ information on TV screens in mess room, meeting & training room. - Information
25	DEMP v2 (Oct 24)	<p>Provide details of all buildings or enclosures on-site including:</p> <ul style="list-style-type: none"> a. Building or enclosure designs for all waste handling and storage areas. b. Details of whether the enclosures or buildings are partially or fully enclosed. c. Details of any dust collection systems e.g. a negative pressure dust extraction system. 	<p>Details of the buildings are shown on the Site Plan (FPP and DEMO).</p> <p>a. and b. Buildings on site are all fully enclosed and comprise of:</p> <ul style="list-style-type: none"> - Weighbridge office and site offices (one double storey building) - ELV depollution building. - Non-ferrous building (sorting and segregating of non-ferrous metals by hand).

		<p>d. The procedure for managing dust inside buildings.</p> <p>e. Details of dust management systems on doorways e.g. PVC strip curtains, misting curtains.</p> <p>f. Details of the closing and opening systems used on buildings or enclosures, e.g. fast-closing doors.</p> <p>g. Details of any filters used on vents on silos, building extractors and conveying systems.</p> <p>h. Details of waste acceptance procedures that occur within.</p> <p>i. Details of processing activities that occur within.</p> <p>j. Details of any transfer activities that occur within.</p> <p>k. Details of any storage activities that occur within.</p> <p>l. Which equipment will be used within buildings or enclosures.</p> <p>[Plus Note]</p>	<p>c. Not applicable or required – no dusty processes or activities are performed within buildings.</p> <p>d. See EPP 4.1 General Housekeeping.</p> <p>e., f. and g. Not applicable no dusty processes or activities take place within buildings.</p> <p>h., i. , j. and k. - Non- ferrous building: See Section 4.4 – Environmental Management Plan (EMP) (Oct 24) v5.</p> <p>- ELV building: Section 4.7.1 - Environmental Management Plan (EMP) (Oct 24) v5.</p> <p>- Weighbridge office building: Not applicable (no waste activities).</p> <p>l. - Non-ferrous building: non-ferrous metal cropper (manual for cutting copper pipes) and mobile Fork Lift Trucks (no other equipment), storage of all non-ferrous metals are within stillages, batteries within battery bins and cable in larger containers of various sizes such as small skips. Non-ferrous metals are inherently non-dusty (e.g. bright copper wire, brass etc.) and free from contamination.</p> <p>- ELV building: 2 x SEDA depollution rigs.</p> <p>- Weighbridge office & site offices: office equipment.</p> <p>ELV and non-ferrous buildings possess large roller shutter doors which fully enclose buildings fully when shut.</p> <p>Note: see Environmental Management Plan (EMP) (Oct 24) v5.</p>
26	DEMP v2 (Oct 24)	<p>Clarify details of any conveyors that will be used on-site, including whether they will be enclosed.</p> <p>[Plus Note]</p>	<p>N/a (No conveyors on site; Silvertown is a feeder site only - not a shredder or separation site).</p>

27	DEMP v2 (Oct 24)	Specify the process of visual dust monitoring on-site, including details of: <ul style="list-style-type: none"> a. When this is carried out. b. Whose responsibility this is. c. The specific locations of monitoring. 	Visual monitoring is done throughout the day during dry periods. This is the primary responsibility of Operations Manager but they might delegate this task to another (competent) operational member of staff. The specific locations of visual monitoring are: <ul style="list-style-type: none"> - The site entrance - The site perimeters / boundaries - Outside the northern boundary (towards the nearest sensitive receptor). -
28	FPP (Oct 24).	Detail the out of hours arrangements for the site, including any security guards or CCTV.	See 2.5 Detection Systems (including out of hours procedure) – FPP (Oct 24).
29	DEMP v2 (Oct 24)	Provide details of your on-site optical dust and particulate monitor including: <ul style="list-style-type: none"> a. Location. b. Specification. c. Servicing and calibration schedule. d. How data from the monitor will be managed. e. The trigger action levels. f. The actions you will take if the alarm is breached. g. Who is responsible for overseeing the on-site PM10 monitoring? 	<p>a. to e. – See Section 4.4 - Equipment and Data Management – DEMP v2</p> <p>f. - see Section 4.7 Actions when alarm is triggered – DEMP v2 (Oct 24).</p> <p>g. – The Operations Manager is responsible for overseeing onsite PM₁₀ monitoring – See 4.5 Recording and reporting of Data - DEMP v2 (Oct 24).</p>
30	DEMP v2 (Oct 24)	Provide greater detail of your complaints procedure including:	

		<p>a. Timescales that will be followed when responding to complaints.</p> <p>b. Provide details of who the site manager and general manager are, as this is not explained anywhere.</p> <p>c. Explain what is meant by numerous complaints being given “higher priority”.</p> <p>d. Information on the course of action to be taken following a complaint if the source of dust cannot be identified.</p>	<p>a. - All dust complaints will be investigated, actions agreed and a response back to the complainant made within 24 hours. – See Section 6.2 Reporting of Complaints – DEMPv2 (Oct 24).</p> <p>b. – The Site Manager and General Manager are the Operations Manager (interchangeable names used on site). This has been amended to just the Operations Manager to avoid confusion. The Operations Manager is also the TCM for the site and is currently a Mr Neil Hayes.</p> <p>c. – See Sections 5 and 6 – DEMP v2 (Oct 24) (original text deleted / amended to give clearer explanation).</p> <p>d. - If the source of dust cannot be identified then wind direction and data from both site dust monitor and local dust monitor will be looked at and investigated to determine if the source of dust may actually be off-site. If this does not reveal anything then dust suppression measures will be increased across the site anyway (not targeted) and an Event log raised.</p>
31	DEMP v2 (Oct 24)	Provide information on Calcium Magnesium Acetate (CMA) addressing the following: Details of storage.	Not applicable – CMA will now <u>not</u> be used at Silvertown.