



# Summary of Management System

Hensel Recycling (UK) Ltd



*Helping clients prosper through compliance*

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### SITE DETAILS

North Storage Depot  
Chiddingfold Road  
Dunsfold  
GU8 4PB

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### OPERATOR DETAILS

Hensel Recycling (UK) Ltd  
12 Maydwell Avenue  
Slinfold  
West Sussex  
RH13 0AS

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### PERMIT/APPLICATION REFERENCE

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## APPENDICES

REFERENCE	TITLE
Appendix A	ISO 14001/9001 Certificates

## DRAWINGS

REFERENCE	TITLE
K245.2~20~001	Permit Boundary Plan
K245.2~20~003	Site Layout Plan

## 1. INTRODUCTION

This document is a Summary of the Management System that accompanies the application for a Bespoke Environmental Permit for an Installation in accordance with the Industrial Emissions Directive for the storage and treatment of hazardous waste.

The site is operated by Hensel Recycling (UK) Ltd and is located at the North Storage Depot, Chiddingfold Road, Dunsfold, GU8 4PB.

The site location is shown on the Permit Boundary Plan (K245.2~20~001).

Site is to operate under an installation bespoke permit to cover the treatment of hazardous waste, consisting of manual sorting, separation, mechanical shearing, storage of hazardous catalytic convertors and RCF matting and of surplus uncontaminated ceramic monolith.

Site will also undertake the storage of Printed Circuit Boards (PCBs), for bulking to an economic load before dispatch for onward recovery.

The operations are currently permitted for a facility located in Slinfold under the Environmental Permit EPR/EP3439DW; this bespoke permit application seeks to move operations to a new site, the subject of this application. Operations are not to change in scale or intensity merely move location.

The application has been prepared by WISER Environment Limited on behalf of Hensel Recycling (UK) Limited.

## 2. PURPOSE AND SCOPE OF MANAGEMENT SYSTEM

Hensel Recycling GmbH was founded in 1998 in Germany and has grown to become a world leader in catalytic convertor recycling. Hensel Recycling has an established and existing written management system accredited to international quality standard: ISO 9001 and environmental standard ISO 14001 (certificates presented at Appendix A of this Management System Summary).

Hensel Recycling (UK) Limited (the applicant) is the UK based subsidiary of Duesmann & Hensel Recycling GmbH founded in 2012. Even though not incorporated within the scope of management system accreditation, Hensel Recycling (UK) Limited benefit from the same management procedures, processes, and documentation in accordance with ISO 9001 and ISO 14001.

Future development of the UK based business may lead them to obtain their own certification to these standards.

The management system covers operations associated with the trading and brokering, collection, transport, storage, treatment and recovery of precious metal-bearing materials and waste as well as continuous development.

The aim of the management system is to document procedures and work instructions which are implemented and maintained on site.

The management system has been produced in accordance with the Environment Agency's Environmental management – guidance Develop a management system: environmental permits available on the .gov website.

Benefits of operating an effective and efficient management system are to ensure sustainable business practices, reduce risks and losses, reduce operational costs, to help obtain business and a good reputation, and to ensure legal compliance.

The key contacts regarding the operation of the sites Environmental Permit are:

<b>Rebecca Brown</b>	+44 1403 792504	r.brown@hensel-recycling.com
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The permitted sites Management System will be supported and supplemented by existing documentation, policies, procedures, work instruction and training plans contained within the Hensel Recycling (UK) Ltd company management system to which all operations are undertaken.



### 3. WASTE QUANTITIES

The annual throughput of site operations is a maximum of 5,000 tonnes per annum.

Given the limited scale of the throughout of site, limited quantities of waste are stored on site. All wastes are stored within intermediate bulk bags, metal cages, IBCs, or drums and barrels. A 40 yard skip is utilised for the storage of scrap metals from the process.

### 4. SITE ENGINEERING

The Environmental Risk Assessment (K245.2~09~004) as well as the BAT document (K245.2~09~006) indicate the routine operations on site do not present a significant environmental risk; all waste treatment is contained within building, under a full extraction system and in limited quantities.

#### 4.1. Site Surfaces

The areas of site are described below are shown on the Site Layout Plan (K245.2~20~003).

All waste treatment is undertaken on an impermeable surface with a sealed drainage system and is a dry process. The treatment is undertaken under a full LEV extraction system.

#### 4.2. Drainage

All operations are undertaken within an impermeable surface on a sealed drainage system. The treatment process is a dry process undertaken within a full LEV extraction system preventing any dust emissions; this is supported by regular housekeeping and site inspection checks.

Spill kits are situated around site to be deployed if the event of a spillage.

#### 4.3. Construction Procedures and Supervisions

Any construction work, infrastructure improvement and replacement will be undertaken by a specialist contractor. A suitably qualified Civil Engineer will inspect works to ensure that all necessary standards and specifications are met.

#### 4.4. Maintenance and Inspection

Daily inspections of site infrastructure will be undertaken by the Technically Competent Manager (TCM) or a person appointed by the TCM, in accordance with Section 9.9 Summary of Maintenance and Inspection Required. All defects will be reported and recorded.

## 5. SITE INFRASTRUCTURE

The site lies within a small commercial park between the villages of Chiddingfold and Dunsfold. The immediate vicinity of site is made up of other commercial units. The remainder of the surrounding area is predominantly agricultural and residential land uses.

The closest residential properties are situated approximately 20 m from the permit boundary. Larger residential areas reside in the village of Dunsfold (see Site Setting Plan K245.2~20~002).

The layout of site is shown on the Site Layout Plan (K245.2~20~003)

Site infrastructure consists of:

- Entrance Gate
- CCTV cameras
- Office, welfare and lab facilities

### 5.1. Site Security

The site is at North Storage Depot, Chiddingfold Road, Dunsfold, GU8 4PB.

The permitted area is approximately 0.38 ha and forms part of a wider commercial site with various commercial units. In summary, the security measures present are as follows:

- Perimeter Fencing
- Alarm system (via CCTV)
- Gated access

Site shall operate from:

*08:00 – 17:00 Monday to Friday*

*09:00 – 13:00 Saturday*

*CLOSED Sundays & Bank Holidays*

Site shall be staffed during these periods and remotely monitored via CCTV 24/7, 365 days a year. Integrity of security measures shall be inspected as part of the daily site inspection whilst CCTV, alarm systems and other machinery shall be maintained in accordance with manufacturers specifications.

## **5.2. Access**

The site lies within a small, commercialised area between the villages of Dunsfold and Chiddingfold, located approx 1.7 km and 2.9 km respectively. The dominant land use is a mixture of agricultural and residential.

Site is accessed via Chiddingfold Road through the gated access.

## **5.3. Site Information**

Emergency contact numbers, head office address and telephone numbers, hours of operation, a copy of the Environmental Permit Number and the Environment Agency's general enquiries and emergency contact telephone numbers will be displayed in the operational area.

## **5.4. Site Office and Welfare**

A site office is provided with electricity, telephone/internet, fire extinguishers and first aid equipment. A copy of the site's Environmental Permit and this MSS will be available within the office.

A visitor's book, site diary and accident book will be in the Site Office. The site diary, or other electronic record, will be used to record any significant event, visits by Environment Agency personnel, dates for proposed engineering works and any other important information.

## **5.5. Fuel and Oil Storage**

Hydraulic and lubricating oils, including waste oils, will be stored in appropriate containers or removed by the service engineer. The container is provided with a spillage containment tray, to prevent the leakage from the container of any materials that might leak from any of the drums contained within it.

## 6. SITE OPERATIONS

### 6.1. Health and Safety Instruction

All visitors to the site will report to the site manager. First time visitors to the site will be required to read the displayed notice giving instruction on health and safety and site procedures.

### 6.2. Duty of Care

All incoming loads will be supported by the appropriate documentation (WTN/HWCN) detailing the source location and description of the waste for Duty of Care purposes.

### 6.3. Carrier Registration

Only registered waste carriers will be contracted to remove waste from site. The site manager will ensure that hauliers removing waste from the site are Registered Waste Carriers using standard checks. Where there is uncertainty regarding registration, a carrier will be asked to provide a validated Waste Carriers Certificate.

### 6.4. Pre-Acceptance Procedure

Hensel Recycling (UK) Ltd accepts hazardous and non-hazardous wastes from within the UK and other European countries at their site, consisting of waste exhaust systems, catalytic converters (both with and without RCF matting) and surplus uncontaminated ceramic monolith direct from the producer.

Printed Circuit Boards (PCBs) are received already separated and pre-segregated by the waste producer prior to arrival on site.

The types of wastes to be accepted at the site are listed in the List of Wastes (LoW) document included within Section 08 of this application.

A pre-acceptance procedure is followed in accordance with S5.06 section 2.1.1.

When a new enquiry is received by Hensel Recycling the waste producer is asked to confirm the type of process where the waste is produced, the expected quantity of waste, and hazards associated with the waste (e.g. HP07 for RCF matting). The enquiry information is allocated a unique reference (contract) code and retained as a record for a minimum of 3 years.

Waste is delivered and stored pending treatment (shearing and milling) in either intermediate bulk bags, metal cages, IBCs, drums, or barrels. These are usually supplied by the Operator.

### **6.5. Reception of Waste**

Upon arrival at Hensel Recycling's site the incoming load is directed to the site office. The containers are visually inspected to confirm the type and quantity of waste is correct to that agreed and specified by the waste producer, and to remove any contaminants, prior to acceptance at the site.

The waste transfer note/consignment note is then completed by Hensel Recycling, dependent on the nature of the waste, stating the date and time of the delivery of the container, details of the delivery vehicle, a description of the waste by type and quantity, EWC, SIC and all other 'duty of care' requirements.

The delivery drivers are then directed to the waste reception unloading area (see Site Layout Plan K245.2~20~003) by a site foreman. The unloading of delivery vehicles is undertaken using a forklift or pallet truck, operated by a suitably qualified person.

### **6.6. Handling and Storage**

A final visual inspection of the waste is then undertaken, where single category loads (e.g. those under 16 01 22) have been received these are unloaded, weighed on suitably calibrated scales and stored directly on the concrete floor in the designated storage area (see Site Layout Plan K245.1~20~003) within the enclosed building.

Where mixed loads are received (under 16 01 21\*), the waste converters with and without RCF matting are visually identified by looking down the pipe and segregated by hand sorting (where this is not possible, the segregation occurs following the de-canning process). These are then weighed, issued a unique reference (usually the contract number) and stored directly on the concrete floor in the designated storage area (see Site Layout Plan K245.1~20~003) within the enclosed building.

Where ceramic monolith (with or without RCF matting) is also present within the same load, it is segregated by visual inspection and hand sorting, weighed, issued a unique reference (usually the contract number) and stored in rigid containers (lined with 400-gauge polyethylene bag) directly on the concrete floor in the designated storage area within the enclosed building.

PCBs are received already separated and pre-segregated by the waste producer and are stored on site 'as received' prior to dispatch for recycling at suitably permitted facilities.

Any non-conforming waste types (Section 08) will be rejected upon visual identification. Rejected wastes will be relocated to the designated quarantine container, the customer will be informed (usually via telephone/email) and arrangements will be made to remove these items from site within 72 hours.

All hazardous and non-hazardous waste types are stored in rigid containers on the concrete floor in the designated storage areas (shown in Site Layout Plan K245.2~20~003) within the enclosed building. Where wastes are stored within containers (lined with 400-gauge polyethylene bag), these are labelled appropriately with a unique reference, date and hazard classification (HP07 for RCF matting), if appropriate.

A record is kept of all waste received at, or rejected from, the site. These records contain:

- Date of arrival
- Producers details
- Previous holders
- A unique reference number
- Container type and size
- Intended treatment/disposal route
- Accurate nature and quantity of waste, including hazards
- Storage location

All records are maintained for a minimum of 3 years following recovery or disposal.

Waste reception and storage is undertaken within an enclosed building. There are no internal drains within the building and as such, any spillages will be allowed to pool on the surface prior to being cleaned up and disposed of at suitably permitted facilities. Spill kits are strategically placed within the building.

Daily site checks are undertaken to ensure that all structures are in good repair and recorded in the site diary. A comprehensive inspection of the site hardstanding is undertaken monthly, repairs are organised where defects are found to maintain the integrity of the surface and prevent the transmission of fluids.

### **6.7. Plant and Equipment**

The site is equipped with three shears, a ball mill, folk-lift truck, pallet truck, dust extraction system and a small on site laboratory for initial precious metal classification and quantification.

All equipment is periodically inspected in accordance with manufacturers' guidelines and manuals to ensure the plant and equipment is available for work, when required.

The site manager also maintains a register of all calibrations of measuring and monitoring devices. All calibrations are undertaken by an approved subcontractor.

### **6.8. Pollution Prevention**

Potential sources of pollution have been identified within the Environmental Risk Assessment (Section 07 of this Application Pack) as:

- Dust
- Fire
- Accident
- Noise and vibration

Daily site inspection checks are undertaken by staff.

The site is fully enclosed within a building.

Site housekeeping and a fully enclosed dust extraction system prevent the release of dust off site.

### **6.9. Site Operational Procedures**

The site is operated in accordance with a number of written procedures incorporated within the Hensel Recycling Management System.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

## 7. WASTE TREATMENT

All site treatment processes are undertaken in accordance with S5.06, and are described in detail below and with the flow diagram presented in Figure 1.

### 7.1. Shearing of Catalytic Convertors

The catalytic converters are removed from the rest of the exhaust system by hydraulic shearing (so-called 'top and tailing' a recognised industry standard treatment method), where not already removed by the waste producer. Catalytic converters are subject to the same hydraulic shearing process to open up the metal casing and extract the ceramic monolith (containing the precious metal catalyst) and the metal or RCF matting which provides thermal insulation and physical support to the ceramic monolith. The equipment is allied to a LEV system to extract and collect any dust/fibres released.

Metal casings, ceramic monolith and RCF matting are segregated and stored on the concrete floor in appropriate containers (lined with 400-gauge polyethylene bag) in designated areas within the enclosed building. Only clean, uncontaminated scrap metal is stored outside in a sheeted 40 yard skip.

### 7.2. Milling of Ceramic Monolith

Ceramic monolith is accepted with and without RCF matting attached. RCF matting is removed by hand and mechanically milled in a ball mill (a recognised industry standard treatment method) within the enclosed building allied to a certified LEV system. Any remaining fragments of RCF are again removed by hand before being bagged (using 400-gauge polyethylene) and stored in the adjacent designated storage area prior to recovery. Dust extracted and collected from LEV systems allied to the shearing and milling processes is added to the bulk bags for each batch/consignment.

### 7.3. Removal of Refractory Ceramic Fibre (RCF) matting

RCF is now classified as a Category 1B carcinogen and has properties akin to asbestos, this is the primary reason why mixed or unsorted catalytic converters are now classed as hazardous waste.

The RCF matting is removed by hand during the shearing and milling processes and stored in labelled, sealed rigid containers (e.g. plastic barrels lined with 400-gauge polyethylene bag) in a designated area adjacent to the ball mill (see Site Layout Plan K245.2~20~003), prior to disposal to a suitably licensed landfill. All employees potentially exposed to this material are suitably trained and wear the required RPE and/or operate under a LEV system fitted with a HEPA filter.



#### **7.4. Printed Circuit Boards**

There is no treatment of PCBs on site. PCBs are received already separated and pre-segregated by the waste producer and are stored on site 'as received' prior to dispatch for recycling at suitably permitted facilities.

## 8. ACCIDENT AND EMERGENCY CONTROL

The following Emergency Action Plans are provided within the management system:

- Accident and Emergency (general);
- Spillages
- Fire Evacuation Plan
- Temporary Closure

### 8.1. Fire

As a hazardous waste storage and processing facility, the Environment Agency Fire Prevention Plan guidance (Updated 11 January 2021) does not apply as Section 3 states:

This guidance also does not apply to the storage of coal, materials, or wastes that are:

- hazardous – excluding WEEE, but including hazardous waste batteries accepted as a separate waste stream.

Fire management will be undertaken in accordance with the site specific Fire Prevention and Emergency Procedure. Control measures implemented are described in the Section below.

## 9. ENVIRONMENTAL CONTROLS

### 9.1. Odour Control

*Overall risk:* Low

*Residual risk (after application of management measures):* Very Low

The control measures to manage dust and fugitive emissions are detailed in the Environment Risk Assessment (K245.2~09~004).

Waste types accepted on site are not considered to be odourous, with deliveries inspected and non-conforming rejected from site if necessary. All processes are carried out within a building, under a full LEV extraction system with HEPA filters fitted.

### 9.2. Dust Control

*Overall risk:* Low

*Residual risk (after application of management measures):* Low

The control measures to manage dust and fugitive emissions are detailed in the Environment Risk Assessment (K245.2~09~004) Section ERA9.

All vehicles delivering and collecting materials are to be covered and limited to a maximum speed of 10 mph. There will be daily maintenance inspections of storage areas and buildings, with vehicles, plants and machinery being operated and maintained in accordance with manufacturers specifications or annually, whichever is more frequent. All these events will be recorded in the site diary.

All processes on site (treatment and storage of wastes) are carried out within a building under active dust and particulate extraction fitted with HEPA filters. The process equipment is cleaned within batches to remove excess particulates not captured by the extraction system.

### 9.3. Litter Control

*Overall risk:* Medium

*Residual risk:* Low

The control measure to manage littering are detailed in the ERA (K245.2~09~004) Section ERA10.

Due to the type of waste received the likelihood of litter generation is very low. SOPs and training is provided to all relevant staff to prevent overfilling the various containers on site.

Where litter is generated, the following measures are employed.

The site is subject to regular housekeeping to suppress litter generation, staff are required to litter pick on a 'see it, pick it up' basis.

Where litter is identified as a nuisance on the site boundary, the TCM and management will immediately organise the collection of litter by staff. Priority will be given to eliminating the source, following which off-site areas and the site boundary will be cleared. The source of the litter will be investigated and removed to a container ready for disposal.

Given all processes on site are undertaken within a building, the risk of litter posing a risk to the environment is low.

#### **9.4. Pests, Vermin, Birds**

*Overall risk: Low*

*Residual risk: Low*

Due to the type of waste received the attraction and harbouring of pests, vermin or birds is very low. The control measures to manage Pests, Vermin and Birds are detailed in the ERA (K245.2~09~004) section ERA11.

All reasonable measures will be taken to prevent and minimise the occurrence of pests. Daily site inspections and good housekeeping procedures will be maintained in order to reduce any occurrence and allow appropriate measures to be taken where necessary.

If an increase in a pest population is observed, the source will be investigated in order to undertake the most effective mitigation measures. If necessary, a pest control contractor shall be employed.

#### **9.5. Mud & Debris**

*Overall risk: Medium*

*Residual risk: Low*

The control measures to manage mud and debris fugitive emissions are detailed in the Environment Risk Assessment (K245.2~09~004) section ERA12.

Vehicles will be visually inspected before leaving the site and advised if there is a need to clear or remove mud or debris. The site itself will also be cleaned as necessary by site personnel to prevent off site mud or debris deposits. Regular housekeeping of all areas will be undertaken on a weekly basis to maintain cleanliness.

The nature of wastes and that all processes are undertaken within a building ensure the environmental risk posed by any mud or debris is low.

### **9.6. Water**

*Overall risk:* Medium

*Residual risk:* Low

The control measure to manage the risk of contaminated water run-off are detailed in the ERA (K245.2~09~004) Section ERA13.

The likelihood of significant contaminated run-off is negligible as liquid waste is not permitted on site, and the processing of accepted wastes will be undertaken on an impermeable surface, within a building on a sealed drainage system. The process itself is a dry process further reducing the risk of any fugitive emission to water.

### **9.7. Noise & Vibration**

*Overall risk:* Medium

*Residual risk:* Low

The Environment Risk Assessment (K245.2~09~004), section ERA15, identifies the risk and control measures for noise and vibration.

An external Noise Impact Assessment (ref: SA-6377-4) has been conducted to identify the impact of operation, and has been considered within the Environmental Risk Assessment (K245.2~09~004).

The site is located within a small but established commercial area, surrounded by other commercial businesses, as shown in the Site Setting Plan (K245.2~20~002), and operations are only carried out within permitted hours, thus there will not likely be a higher noise level

generated in relation to the surrounding area. The Noise Impact Assessment confirms this (ref SA-6377-4).

All vehicles, plants and machinery will be inspected and maintained regularly in line with maintenance schedule set out by the manufacturer's specifications.

### **9.8. Fire**

*Overall risk:* Medium

*Residual Risk:* Low

The Environmental Risk Assessment (K245.2~09~004), section ERA13 identifies the risk and control measures for fire in relation to activities on site.

Site is operated in accordance to a Fire Risk Assessment, deals with small quantities of waste and almost all waste streams accepted are non-combustible. All incoming waste is source segregated and storage areas are organised with appropriate breaks to limit risk even further.

Operational areas are regularly cleaned to prevent the build-up of dust whilst all activities are conducted under active dust extraction.

## 11. CLIMATE CHANGE

Climate change may increase risk of uncontrolled emissions or smoke and fire water; increase in waste reactions or fires involving heat sensitive or combustible waste; and increase in high temperature expansion and stress of plant, pipework and fittings. There is also a risk if UV degradation of plastic pipes and hoses causing them to fail; increased dust emissions from processing areas (risk of reduced water availability for dust suppression); and potential increased risk of wildfires impacting the site.

Potential effects from climate change have been identified within Table ERA15 of the Environmental Risk Assessment (ERA) (K245.2~09~004), where management procedures and controls are identified to reduce identified risk.

The effects of climate change and management will be reviewed on an annual basis, along with the Management System or following an extreme climate event.

### 11.1. Temperatures

Temperature fluctuations are unlikely to impact the current waste stream accepted on to site, especially given all treatment operations are undertaken within a building. If the waste streams change then this will be re-assessed.

#### 1.1.1. Summer

The potential for risk posed by increasing temperatures during summer months is limited. Except for PCBs and scrap metal all wastes are non-combustible, stored in limited quantities within containers within a building.

The appropriate mitigations to further control the limited risk can be found in the Environmental Risk Assessment (K245.2~09~004).

#### 1.1.2. Winter

The potential for odour complaints and pest infestations in warmer winter temperatures have been considered and appropriate mitigations can be found in the Environmental Risk Assessment (K245.2~09~004).

The risk of freezing pipes in response to lower winter temperature has also been considered in the Environmental Risk Assessment (K245.2~09~004).

### **11.2. Rising Sea Levels**

The proposed site is positioned 745 m from the River Wey which is its closest water source. The site is located in a Very Low Risk Flood Zone for both fluvial and pluvial processes (Environmental Risk Assessment – K245.2~09~004).

### **11.3. Changes in Rainfall Patterns and Intensity**

The potential for increased site surface water and flooding have been considered and mitigated for in the Environmental Risk Assessment (K245.2~09~004).

### **11.4. Heat Waves**

Long periods of hot and dry weather have been considered, with cooling systems, emergency water usage and consideration of wastes accepted on site reviewed within the Environmental Risk Assessment (K245.2~09~004).

### **11.5. Storms**

The potential for high winds causing damage to buildings, infrastructure and plants will be mitigated by regularly surveying of the sites infrastructure quality and keeping up-to-date with all EA and Government weather reports (Environmental Risk Assessment – K245.2~09~004).



## 12. TRAINING AND COMPETENCE

The site shall be overseen and managed by a Technically Competent Manager (TCM) holding the relevant Operator Competence Certificate qualification. A TCM will be available at all required times during site operation. The TCMs will be responsible for the day to day operations at the site, and to ensure that site personnel operate the site in compliance with the Environmental Permit. They will be responsible for ensuring adequate training of staff has been undertaken.

The TCM will report any problem, or potential problem, to Senior Management as well as the Environment Agency.

The TCM will attend site in accordance with the attendance criteria specified within 'Environmental Management – Guidance: Legal Operator and Competence Requirements: environmental permits' available on the .gov website.

All new site staff are taken through an Induction Process covering all areas of site operations including: Emergency procedures, PPE, all site operations, company policies, and all relevant conditions of the Environmental Permit.

To ensure safe operation of the site, all site operators are trained in the use of site plant and equipment.

Operator training is reviewed regularly through refresher courses to ensure continued competence in their daily tasks.

## 13. COMPLAINTS

Hensel Recycling (UK) Limited's parent company operate and maintain a certified Quality Management System to ISO 9001 (Appendix A). All complaints received concerning the permitted site will be dealt with in accordance with the companies Quality management System.

On receipt of a complaint the TCM, or their nominated person, will investigate the complaint to see if the cause can be rectified swiftly. Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

In all cases all complaints will be acknowledged and investigated, with resultant actions reported to the complainant.

### 13.1. Non-conformances, corrective & preventative actions

Any non-conformances recorded by the TCM or the Environment Agency will be actioned in a timely manner or in line with an appropriate time scale set by the Environment Agency.

Non-conformances will be remedied so that the operation that led to the non-conformance is prevented or changed, to ensure compliance with the environmental permit.

Corrective actions will be recorded in the site diary.

## 14. DOCUMENTS AND RECORDS

### 14.1. Records & Reporting

As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the site permit;
- Site Management System Summary and all associated documents;
- Operational procedures;
- Site and activity risk assessments;
- Competence and training records;
- Compliance records; and
- Duty of Care documentation and Environment Agency (EA) waste returns.

Records must be retained for 6 years; unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender.

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

### 14.2. Security

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

### **14.3. Availability**

In accordance with the condition requiring records to be kept, all records required under the terms of the Permit shall:

- Be legible;
- Be made as soon as reasonably practicable;
- If amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and
- Be retained, unless otherwise agreed with the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until Permit surrender:
  - off-site environmental effects; and
  - matters which affect the condition of land and groundwater.

All records, plans and the management system required to be maintained by the Permit shall be held on site.

## 15. REVIEW THE MANAGEMENT SYSTEM

The Management System Summary will be reviewed in its entirety at least annually or following any substantial change in site operations.

Other activities which may prompt review of the Management System are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review results in required changes, this will be documented and maintained with the site records, for example, changes to environmental management measures, new or altered equipment.

## 16. SITE CLOSURE

Hensel Recycling (UK) Limited will plan for the closure of the site through maintaining the Site Condition Report provided in Section 05 of the application pack.

The Site Condition Report will be supplement with records of site maintenance and development, following pollution incidents records of actions taken and any remedial works and verification reports undertaken shall be kept, as well as any monitoring results.

The information collated during the lifetime of the permit will be utilised to prepare the surrender Site Condition Report to ensure that the site operation has not caused a detrimental impact to the surrounding environment.

## 17. AVAILABILITY OF MANAGEMENT SYSTEM

All site operational staff will be trained in the contents of the Management System to ensure compliance and consistent operation of the site.

A copy of the Management System Summary and all associated documents will be made available at the Company's main office for reference purposes and is available on request to interested parties.



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