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SIMS MANCHESTER RECYCLING FACILITY PERMIT VARIATION APPLICATION

Supporting Information

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NON-TECHNICAL SUMMARY

This document forms the application to vary an environmental permit at Sims Metal Recycling Facility (MRF) on Rondin Road, Manchester. The site currently has a Standard Rules Permit EPR/EB3803ME in place. This application seeks to vary the permit from a Standard Rules environmental permit to a bespoke waste activity permit that allows the operation of an Authorised Treatment Facility (ATF) for the depollution of End of Life Vehicles (ELVs) and the storage of Waste Electrical and Electronic Equipment (WEEE), in addition to the existing MRF. This application also seeks the addition of one EWC code to regularise the storage of non WEEE cables in light of regulatory position statement 276: Storing and Treating Hazardous Waste Cables.

The ATF in the proposed variation at this site will undertake the dismantling of ELVs. This includes the depollution of ELVs through removing the vehicle battery, fuel, tyres, liquids and oils etc., and ensuring all vehicle materials are reused, recycled or safely disposed.

As part of this depollution process, Sims will store materials on site. This will include storage of batteries, tyres, scrap metal, ferrous and non-ferrous metals, ELV fluids etc. Sims will also treat these materials where applicable to ensure all hazardous substances are removed. There will be no treatment of batteries, catalytic converters or fluids.

The WEEE activities will be limited to storage, there will be no treatment of WEEE.

The site is already permitted for non-hazardous cables, and the addition of the EWC code for hazardous cables will not result in different or additional cables. The addition of this code is to regularise, following the change in classification.

There will be no change to the existing permitted activities as a result of the variation. The permit boundary is being varied to include the part of the site currently covered by the exemption.

There will be no new point source emissions as a result of the proposed variation.

The applicant and operator of the MRF is Sims Group UK Limited.

The Facility is operated in accordance with a documented management system. This will be reviewed and updated where required to cover the additional activities.

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1 INTRODUCTION

1.1 Context

1.1.1 This document and its supporting appendices form the application to vary Environmental Permit (EP) EPR/EB3803ME from Standard Rules (SR) SR2008No21 permit to a bespoke waste activity permit.

1.1.2 This application is submitted by Sims Group UK Limited, (hereafter referred to as Sims), who are both the applicant and operator.

1.2 Background

1.2.1 The existing permit (EPR/EB3803ME) was issued on 08/10/2013 for Standard Rules 2008 No21 75kte MRF. The permit was transferred on 23/01/2017 to be operated by Sims. The site is currently permitted to operate waste mobile plant described in Standard Rules SR2008No 21.

1.2.2 The MRF forms a strategic component of a network of recycling facilities operated by the company throughout England and Wales. The waste management activities carried out on the site include:

- Ferrous and non-ferrous metal recycling.
- Storage of depolluted End-of-Life Vehicles (ELV's);
- Storage of Batteries

1.2.3 In addition to the permitted activities the proposals are to include an Authorised Treatment Facility (ATF) for the depollution of ELVs and WEEE storage at the same site. As a consequence of the co-location of the facility and the required tonnage, there is no standard rules permit available that would cover the existing and proposed activities.

1.2.4 There are two waste exemptions registered to the site; S2 for storing waste in a secure place and T9 for recovering scrap metal. These will be deregistered following this variation.

1.3 Site Location

1.3.1 The site address is Rondin Road, Manchester M12 6BF. The site is centred at National Grid reference SJ 86199 97318. The site location is provided in Drawing 1.

1.3.2 The site setting is characterised as follows:

- To the north is Rondin Road and beyond that are industrial and waste facilities and a garden centre.
- To the east is Rondin Road, beyond that is an industrial train care facility associated with the nearby railway tracks.
- To the south are railway tracks and Ardwick train station with a freight terminal, residential and further industrial uses beyond that.
- To the west of the site is industrial land associated with Ardwick train station.

1.3.3 The nearest residential properties are located on Anthony Close approximately 170 m to the southeast of the site. The nearest school is Dean Trust Ardwick Secondary School 367 m to the southeast of the site. Drawings 3 and 4 provide further details of the surrounding sensitive receptors.

1.3.4 There are no European Sites or SSSI within 200 m of the site. The nearest designated site is the Clayton Vale Local Nature Reserve which is approximately 2 km to the northeast of the site.

1.3.5 The site is not located within a source protection zone (SPZ), the nearest SPZ is approximately 1.5 km to the southwest of the site.

2 PERMIT VARIATION

2.1 Existing Permit

2.1.1 The existing Standard Rules SR2008No 21 Metal Recycling Site permit (EPR/EB3803ME) allows the following activities:

- **R13**: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced); and
- **R4**: Recycling/reclamation of metals and metal compounds.

2.1.2 There will be no change to these existing permitted activities as a result of the variation.

2.2 Proposed Activities

2.2.1 The additional activities as per this variation will be an Authorised Treatment Facility (ATF) for the depollution of ELVs and WEEE storage. The total quantity of waste accepted at the site is estimated to be 11,520 tonnes per year versus ELV activities and 7,100 tonnes per year versus WEEE storage activities.

2.2.2 In addition to the above activities in 2.1.1, this variation application to a bespoke waste activity permit is to include the following activities:

- **R3:** Recycling/reclamation of organic substances which are not used as solvents
- **R5**: Recycling/reclamation of other inorganic materials; and
- **D15**: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

2.2.3 The maximum amount of hazardous waste stored at the site from both the MRF and the ATF will not exceed 50 tonnes (excluding motor vehicles awaiting depollution and WEEE pending manual sorting, manual dismantling, repair or refurbishment).

Wastes to be Accepted

2.2.4 The table below identifies the EWC codes of the current permitted site.

Table 2-1 EWC codes of the currently permitted site

Waste Code	Waste Type
02	**wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing.**
02 01	***wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing***
02 01 10	waste metal
12	**wastes from shaping and physical and mechanical surface treatment of metals and plastics**
12 01	***wastes from shaping and physical and mechanical surface treatment of metals and plastics***
12 01 01	ferrous metal filings and turnings
12 01 03	non-ferrous metal filings and turnings
15	**waste packaging, absorbents, filter materials, wiping cloths and protective clothing not otherwise specified**

15 01	***Packaging (including separately collected municipal packaging waste***
15 01 04	metallic packaging
16	**wastes not otherwise specified in the list**
16 01	***end-of-life vehicles containing neither liquids nor other hazardous components***
16 01 06	end-of-life vehicles containing neither liquids nor other hazardous components
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	discarded components not otherwise specified
16 06	***batteries and accumulators***
16 06 01	lead batteries*
17	**construction and demolition wastes (including excavated soil from contaminated sites)**
17 04	***metals (including their alloys)***
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 11	cables other than those mentioned in 17 04 10
19	**wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption/industrial use**
19 01	***wastes from incineration or pyrolysis of waste***
19 01 02	ferrous materials removed from bottom ash
19 10	**wastes from shredding of metal-containing wastes**
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 12	**wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**
19 12 02	ferrous metal
19 12 03	non-ferrous metal
20	**municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions**
20 01	***separately collected fractions (except 15 01)***
20 01 33*	lead batteries*
20 01 40	metals

2.2.5 In addition to the above, the following EWC codes will need to be included in the proposed variation.

Table 2-2 EWC codes to be included in the proposed variation

Waste Code	Waste Type
16	**wastes not otherwise specified in the list**

16 01	***end-of-life vehicles containing neither liquids nor other hazardous components***
16 01 03	end of life tyres
16 01 04*	end of life vehicles*
16 01 21*	hazardous vehicle components – catalytic converters containing RCF matting
16 02	***wastes from electrical and electronic equipment***
16 02 09*	transformers and capacitors containing PCBs
16 02 11*	discarded equipment containing chlorofluorocarbons, hydrochlorofluorocarbons and hydrofluorocarbons
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
16 06	***batteries and accumulators***
16 06 02	Ni-Cad batteries
16 06 03	mercury-containing batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
17	**Construction and demolition wastes (including excavated soil from contaminated sites)**
17 04	***Metals (including their alloys)***
17 04 10*	Cables containing oil, coal tar and other hazardous substances
20 01	***separately collected fractions (except 15 01)***
20 01 23*	discarded equipment containing chlorofluorocarbons
20 01 33*	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries.
20 01 34	Batteries and accumulators other than those mentioned in 20 01 3
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

Waste Storage

2.2.6 The un-depolluted ELV activity and WEEE storage activity will be carried out on an area of impermeable pavement linked to the sites sealed drainage system, which discharges to sewer with the consent of the sewerage undertaker, United Utilities. The proposals do not require the construction of additional hard surfaced areas which would increase run-off volumes and the nature of the discharges are expected to be similar. On this basis the consent from United Utilities does not require amendment and is suitable for these discharges.

2.2.7 Site surfacing will be inspected on a regular basis. Any areas of surfacing showing wear will be monitored and repaired as soon as reasonably practicable. Any repair works were recorded in the site diary.

2.2.8 Un-depolluted ELVs, or ELVs delivered to site without the necessary documentation to state they have been depolluted in accordance with the ELV Regulations 2003, will be stored in the un-depolluted ELV area.

2.2.9 Waste storage areas will be provided with spillage collection facilities and spill kits.

2.2.10 Wastes will be stored for no longer than 1 year prior to disposal and 3 years prior to recovery.

2.2.11 The ELVs will be stored in accordance with the EA's ELV guidance[1] and in accordance with Sims current Fire Prevention Plan (FPP) which has been informed by EA FPP Guidance[2] . ELVs will be stacked no more than 2 high and each vehicle must be accessible from at least one side, meaning a maximum of two rows together. The ELV's will be stored as shown on the Site Layout plan, in Drawing 1.

2.2.12 Further details on fire prevention and firefighting requirements are provided in the FPP, provided in Appendix C.

Depollution Activities

2.2.13 There will be two vehicle depollution rigs installed, vehicles will be loaded onto the rig to allow depollution/ dismantling operations.

2.2.14 ELVs will be depolluted in accordance with ELV guidance[3] as follows.

- removal of batteries and liquified gas tanks • removal or neutralisation of potential explosive components, (e.g. air bags);
- removal and separate collection and storage of fuel, motor oil, transmission oil, gearbox oil, hydraulic oil, cooling liquids, antifreeze, brake;
- fluids, air-conditioning system fluids and any other fluid contained in the end-of-life vehicle, unless they are necessary for the re-use of the parts concerned;
- removal, as far as feasible, of all components identified as containing mercury;
- removal or catalysts; and
- removal of tyres.

2.2.15 Once depolluted, the depolluted ELV will be removed from the depollution rig and stored in a designated storage area, prior to transfer offsite to a suitably authorised shredder site for treatment in the metal shredder. The depolluted ELV may be flattened or baled.

Fluids

2.2.16 Fluids from ELVs will be stored in containers with appropriate secondary containment measures capable of holding at least 110% of the volume of the primary containment vessel. Fluids will be disposed of via an authorised treatment facility as necessary.

2.2.17 Liquid ELV residues will be contained in labelled, double skinned tanks or containers, oil filters in oil drums (unless crushed).

[1] End of life vehicles (ELVs): guidance for waste sites - GOV.UK (www.gov.uk)

[2] Fire prevention plans: environmental permits - GOV.UK (www.gov.uk)

[3] 3 Defra Environmental Permitting Guidance The End-of-Life Vehicles Directive for the Environmental Permitting (England and Wales) Regulations 2010. March 2010 V 3.0

Tyres

2.2.18 The maximum pile size for tyres will be as specified in FPP.

Batteries

2.2.19 Batteries in ELVs will be disconnected or removed as soon as practicable and before stockpiling.

2.2.20 Batteries will be stored in leak proof acid resistant battery boxes with lids to prevent ingress of water, unless stored under weatherproof covering.

2.2.21 There will be no treatment of lead acid batteries, other than their removal from the ELV and sorting and separating from other wastes.

2.2.22 The maximum pile size for batteries will be as specified in FPP.

Catalytic Converters

2.2.23 There will be no treatment including the decanning of catalytic converters, other than their removal from the ELV and sorting and separating from other wastes.

2.2.24 No more than 10 tonnes of intact waste vehicle catalytic converters will be stored at the site at any one time.

Waste Treatment

2.2.25 Treatment will consist of depollution of ELVs and sorting, separation, grading, baling, shearing, compacting, crushing and cutting of waste into different components for recovery.

2.2.26 The maximum quantity of hazardous waste treated for disposal or recovery will not exceed 10 tonnes per day. This does not include the manual depollution and dismantling of ELVs, or the manual sorting, manual dismantling, repair or refurbishment of WEEE.

Management of Outputs from the ATF

2.2.27 Following treatment at the ATF facility, sorted and segregated wastes will be transferred for further treatment or disposal at a permitted off-site facility.

3 ENVIRONMENTAL RISKS

3.1 Emissions to Air

3.1.1 There are no point source emissions to air from the existing or proposed activities.

3.2 Emissions to Sewer

3.2.1 Site drainage is shared by both the current permitted facilities and the additional activities.

3.2.2 There are no process discharges direct to surface water from either operation. Surface water run-off is discharged to sewer via interceptor, with the consent of the water authority.

3.2.3 All permitted activities will be undertaken on impermeable surfaces with a sealed drainage system. Surface rainwater from the impermeable surfaces discharge to sewer via an attenuation tank and interceptor. A Drainage Plan is provided in *Drawing 5*. The site has consent to discharge to sewer from United Utilities, this consent is suitable for the proposed activities and does not need to be amended.

3.3 Emissions to Land

3.3.1 There are no point source emissions to land from the existing or proposed activities.

3.4 Odour

3.4.1 The nature of the existing and proposed activities do not include the management of highly odorous wastes. Odour risks have been assessed and management controls for odour described as part of the Environmental Risk Assessment included in Appendix E. Overall the risk from odours was assessed as low or very low.

3.5 Noise

3.5.1 The environmental risk from noise associated with the proposed activities has been considered within the Environmental Risk Assessment included as Appendix E. This assessment concluded that with the proposed management controls identified in the ERA the risk from noise is low.

4 MANAGEMENT OF ACTIVITIES

4.1 Management Systems

4.1.1 Sims have an existing environmental management system (EMS) covering the activities on site including the operation of proposed variation activities. The EMS will be reviewed to ensure it covers the new activities subject to this variation. A summary of the EMS is included in Appendix B.

4.2 Waste Pre-Acceptance Procedures

4.2.1 There is a pre acceptance system in place, this consists of checks undertaken by Commercial/ Site Management and includes information on the composition of the waste, the process giving rise to the waste, the likely quantities and any hazards that may be associated with the waste. These checks are carried out before a decision is made to accept the waste.

4.2.2 The site may receive waste on an adhoc basis. In those instances, pre-acceptance checks take place at the weighbridge, by exchanging information before waste is accepted.

4.3 Waste Acceptance Procedures

4.3.1 When waste is brought into the site there are procedures for identification, quarantine and/ or repatriation of gas cylinders and other prohibited items.

4.3.2 The majority of the undepolluted ELVs will be from domestic sources, these will be brought to site by vehicle recovery operators or by the public.

4.3.3 All ELVs delivered to site without the necessary evidence to state they have been depolluted in accordance with the ELV Regulations are stored on an area of the site constructed of impermeable pavement linked to the sites sealed drainage system. These ELVs will be taken to the depollution rig for depollution in accordance with the ELV Regulations, as detailed in Section 2.2 of this document.

4.3.4 The majority of WEEE will be from domestic sources e.g. civic amenity sites aka household waste recycling centres or domestic collections.

4.4 Fire Prevention Plan

4.4.1 Sims have an existing Fire Prevention Plan (FPP) covering the activities on site including the operation of proposed variation activities. The FPP will be extended to cover the new activities subject to this variation. The FPP is included in Appendix C.

REFERENCES

1. End of Life Vehicles(ELVs): Guidance for waste sites End of life vehicles (ELVs): guidance for waste sites - GOV.UK (www.gov.uk)

2. Fire Prevention Plans : Environmental Permits Fire prevention plans: environmental permits - GOV.UK (www.gov.uk)

3. Environmental Permitting Guidance: The end-of-life vehicles directive Environmental permitting guidance: The end-of-life vehicles directive - GOV.UK (www.gov.uk)

Drawing 1 Site Location Plan

Drawing 2 Site Layout Plan

Drawing 3 Site Location Plan Including Human Sensitive Receptors

Drawing 4 Site Location Plan Including Ecological Sensitive Receptors

Drawing 5 Site Drainage Plan

Appendix A
APPLICATION FORMS

Appendix B
EMS

Appendix C
FIRE PREVENTION PLAN

Appendix D
SITE CONDITION REPORT

Appendix E
ENVIRONMENTAL RISK ASSESSMENT

Appendix F
TECHNICAL COMPETENCE

SIMS MANCHESTER RECYCLING FACILITY PERMIT VARIATION APPLICATION

Supporting Information

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