BAT Assessment

Unit J Prestwich Industrial Estate

KAS Metal Trading Limited

Unit J Prestwich Industrial Estate
Coal Pit Lane
Atherton
M46 0RY

Prepared by:

Wardell Armstrong LLP

City Quadrant, 11 Waterloo Square, Newcastle Upon Tyne, NE1 4DP

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1.0 Introduction

KAS Metal Trading Limited have commissioned Wardell Armstrong LLP to prepare a permit application for their Metal Trading Facility, Unit J, Prestwich Industrial Estate, Coal Pit Lane, Atherton, M46 0RY.

The site is essentially a metal waste recycling facility that accepts, sorts and bulks scrap metals for onwards transport and trading. It is proposed that the site will also accept large WEEE, excluding fridges and freezers, for bulking and onward transportation. WEEE will not be treated onsite.

The following activities are undertaken on the site:

- R4 (Recycling/reclamation of metals and metal compounds) (storing, manual sorting and hand cutting of metal scrap);
- R5 (Recycling/reclamation of other inorganic materials) (manual sorting and storage of plastic etc, only that incidental to managing the scrap metal);
- R12 (Exchange of wastes for submission to any of the operations numbered R1 to R11) (manual sorting of waste on site);
- 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));
- D15 (Storage pending any of the operations numbered D1 to D14) incidental to the recycling activity only.

This report provides the Best Available Techniques (BAT) assessment. BAT applies to the listed activity, that is the storage of hazardous waste.

Section 2 provides the specific BAT considerations for the acceptance, storage and treatment of hazardous and non-hazardous wate.

As there are no specific requirements for storage of hazardous waste The *Best Available Techniques (BAT) Reference Document for Waste Treatment* BREF Note has been used. This presents BAT at two levels, generic BAT valid for the whole waste sector, and specific BAT valid for the particular process or group of processes. Therefore, this BAT assessment includes a combination of generic BAT elements and specific BAT elements which are relevant to the operations to be undertaken at the Facility.

The site will operate in accordance with the relevant appropriate measures for permitted facilities; Waste electrical and electronic equipment (WEEE).

2.0 Compliance with BAT Reference Document for Waste Treatment

This section describes how the site will comply with specific BAT considerations for the acceptance, storage and treatment of waste.

Table 2.1: Compliance with BAT for Waste Treatment

Ref	Consideration	Measures implemented
BAT 1	In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS)	The site will be operated in accordance with an EMS. The EMS includes procedures to ensure compliance with relevant legislation and the conditions of the Environmental Permit as well as seeking continuous improvement in environmental matters. This forms part of KAS Metals management system which is ISO14001 accredited.
BAT 2	Site pre-acceptance and acceptance procedures, waste tracking, sorting of waste, waste segregation and managing the quality of outputs	KAS Metals will ensure they have received pre-acceptance information and characterisation before accepting wastes at the facility. This will include composition, the process producing the waste, tonnage and its physical state. Any special storage or other information regarding the handling of the waste and potential incompatibilities will be made known to the facility in the pre-acceptance stage. Waste will be tracked and accounted for at all times. All samples will be representative of the waste. Waste will be physically separated depending on its properties in order to enable easier and environmentally safer storage and treatment. Manual separation by means of visual examinations will be undertaken to ensure waste is stored in the appropriate location.
BAT 3	Reduction of emissions to water and air	Waste will be stored inside an enclosed building with an impermeable concrete surface or in a sealed container that prevents rainwater ingress and has an impermeable base to prevent emission to ground or water. There are no gaseous emissions to air associated with the site.
BAT 4	Reduce the environmental risk associated with the storage of waste: Optimised storage location, Adequate storage capacity, Safe storage operation, Separate area for storage and handling of packaged hazardous waste	Waste will be stored inside an enclosed building with an impermeable concrete surface or in a sealed container. The quantity of waste on site will not exceed the limits set out in the Permit or in the Fire Prevention Plan. A first in first out procedure will be implemented to ensure all waste has the shortest possible residence time. Wastes known to be sensitive to heat, light, air, water are stored in appropriate containers or within the building. Hazardous waste will be stored in separate labelled bays or appropriate containers and segregated from other wates.
BAT 5	Reduce the environmental risk associated with the handling and transfer of waste	Handling and transfer of waste will be carried out by competent staff. Measures are taken to prevent, detect and mitigate spills including handling and treatment of waste undertaken within the building, daily housekeeping checks. Spills are unlikely as no liquid waste will be accepted onsite.

Ref	Consideration	Measures implemented
BAT 6&7	Monitoring emissions to water	Surface water runoff is directed to surface water manholes at the site. Waste will be stored inside an enclosed building with an impermeable concrete surface or in a sealed container that prevents rainwater ingress and has an impermeable base to prevent emission to water. All runoff is expected to be clean rainfall from the site surfacing or the building roof.
BAT 8	Monitoring of point source emissions to air	Not Applicable, no point source emission to air from this facility.
BAT 9	Monitor emissions from regeneration of solvents, treatment of solvents and use of solvents to decontaminate equipment containing POPs	Not Applicable. No treatment or decontamination using solvents on site
BAT 10	Odour monitoring where a nuisance at sensitive receptors is expected or has been substantiated.	All treatment activities will be located within an enclosed building. Treatment of metals is limited to cutting to size. Metal storage and treatment is not anticipated to give rise to any fugitive odour emissions. No significant odour is anticipated.

Ref	Consideration	Measures implemented
BAT 11	Monitor energy, raw material and water use	Electricity supply for the site will be derived from connection to the electricity grid and will be metered, with records kept regarding use of electricity. Energy usage will be reviewed at least once every four years and potential energy savings will be identified and implemented where possible. A list of raw materials used at the site will be maintained and reviews will take place at least once every four years to assess any available substitutes and consider their implementation where this will reduce the environmental risk. Raw materials will be purchased in a manner that facilitates waste reduction and recycling. The regular review of raw materials will include steps to ensure that if any substitutions for raw materials become available, they are evaluated and reviewed for potential uptake and use. Where improvements in raw material use can be achieved without excessive cost or reduction in the quality of the product these will be implemented. Kas Metals will review water use at least once every four years to identify whether or not any increased efficiencies can be made.
BAT 12	Odour Management Plan in place	An odour management is not considered necessary, only metals wastes, batteries and WEEE will be accepted on site. These are non-putrescible wastes and will not give rise to odour
BAT 14	Minimise sources of diffuse emissions to air in particular of dust, organic compounds and odour	Diffuse emissions are not expected as waste treatment is limited to cutting larger pieces of metal to size. Storing, treating and handling waste will be undertaken in enclosed buildings except where waste is stored in an enclosed container. The nature of wastes accepted on site are unlikely to give rise to fugitive emissions. Any metal wastes that may generate dust are stored inside the building. Good housekeeping measures will be employed on site including regularly cleaning the whole waste storage and treatment area, equipment and containers.
BAT 17	Noise Management Plan where nuisance at sensitive receptors is expected or has been substantiated.	A noise impact assessment has been undertaken for the site. This showed no adverse effects from noise emissions from the site.

Ref	Consideration	Measures implemented
BAT 18	Reduce noise by one, or a combination of appropriate location, proper operation and maintenance of plant, low noise equipment, noise attenuation.	Modern and well maintained plant will be employed at the site which will minimise any noise. Site staff and management will monitor for noise and vibration during the operation of the site and if any complaints or issues are discovered, they will be investigated and remedial action taken. No idling policy in place of any vehicles. The site is on an existing industrial estate and this activity has been undertaken for 16 years without complaint.
BAT 19	Manage water effectively by managing water use, recirculating water where appropriate, reducing the chance of overflows, roofing waste storage areas, impermeable surfacing and adequate drainage.	Storage and treatment takes place inside a building on an impermeable floor or waste is stored in containers, preventing contaminated run-off. No water is used in the treatment process. No tanks containing water are stored onsite, water is used via a mains connection where required. The use of water is limited to office/welfare activities only.
BAT 20	Treatment of wastewater	Building wastewater from the welfare faciltiies goes to foul sewer. Surface water runoff will be clean rainwater from the building roof or hardstanding. Waste is stored inside the building or in sealed containers outside
BAT 21	Limit emissions from incidents by protecting plant from malevolent acts, effective controls, prevention of fire, incident management plan, logging incidents and learning from incidents	The building is an industrial unit which can be locked when the site is unmanned. External shipping containers are locked. A fire prevention plan is in place. The management system includes management of incidents and should an incident or non-compliance occur records will be kept. These will be reviewed on an annual basis to identify whether updates to the management system are needed to prevent further issues.
BAT 22	Reduce raw material use by substituting waste	The main aim of the process is to recycle usable compounds from waste. Raw materials are those that are essential to the day to day site operations for example fuel for plant. Raw material usage is limited. These will be reviewed on a regular basis to make savings where possible.
BAT 24	Reuse of packaging	Packaging in which scrap metal is delivered to site will be reused or recycled as far as possible.
BAT 25	Reduce emissions to air of dust, and of particulate-bound metals, PCDD/F and dioxin-like PCBs	Physical treatment of waste comprises the use of a portable shear to cut metal to size. This generates no or insignificant emissions of dust. The shearing is undertaken within the building. The shear will be maintained in accordance with manufacturers recommendations. Hazardous material is not put through the shear.

Ref	Consideration	Measures implemented
BAT 26-52		Not Applicable Relate to specific Activities that are not undertaken at the site

3.0 Specific Requirements for Water Use

Water use at the Site will be minimal, given the nature of the site and its activities.

Usage will typically be limited to cleaning and housekeeping and amenities provided by the site i.e. toilets, hand wash facilities and food/drink preparation.

Water use will be monitored and reviewed at least once every four years and where options to further reduce water use become available these will be implemented.

4.0 Use of Energy

4.1 Compliance with BREF Note on Energy Efficiency

In order to comply with the BAT conclusions on energy efficiency, KAS Metals will have an energy efficiency and management system incorporated into their Environmental Management System. This will include a commitment from senior managers to use energy efficiently and to seek to reduce carbon emissions where possible.

Communication via toolbox talks will be made to staff to raise awareness of the energy policy and encourage employee engagement.

Energy use will be reviewed at least once every four years and targets for efficiencies will be set, seeking continuous improvement and reduction in emissions.

Where new plant is being purchased energy efficiency will be an important consideration.

All plant will be part of the planned preventative maintenance programme and will be properly maintained so as to operate without excessive use of energy. Staff will receive training so that procedures are followed correctly and idling of mobile plant is avoided.

All energy use will be recorded so that quantitative comparisons can be made and energy savings can be properly assessed.

4.2 Specific Energy Consumption

To allow benchmarking and assessment of progress against any energy efficiency targets that are set the specific energy consumption will be monitored and calculated each year. This will be established during the first year of operation when energy use will be recorded in order to provide a baseline for energy usage and carbon emissions.

Targets will be set to reduce energy use as appropriate.

Energy usage for the site is provided in Table 4.1.

Table 4.1: Energy Usage

Energy source	Use	Quantity (kWh)	Operating time (hours/ annum)	Total (kWh/annum)
National Grid	Lighting, equipment, Office, amenity appliances	115.5kW/ day	07:30 to 17:00 Mon to Fri	29,000kW
				TOTAL 29,000kW

5.0 Raw Materials and Waste

Table 5.1 sets out the annual raw material usage. Fuel will be stored with appropriate bunding to capture any leaks or spills.

Chemicals will be stored in appropriate containers prevent them coming into contact with each other or leaking/spilling for example lubricating oil or cleaning products.

An inventory will be maintained to record the quantity of material on site and material usage.

Raw material usage will be reviewed at least once every 4 years to ensure that the best available environmental options are being utilised and raw material use is being minimised.

Table 5.1: Predicted Raw Material Usage

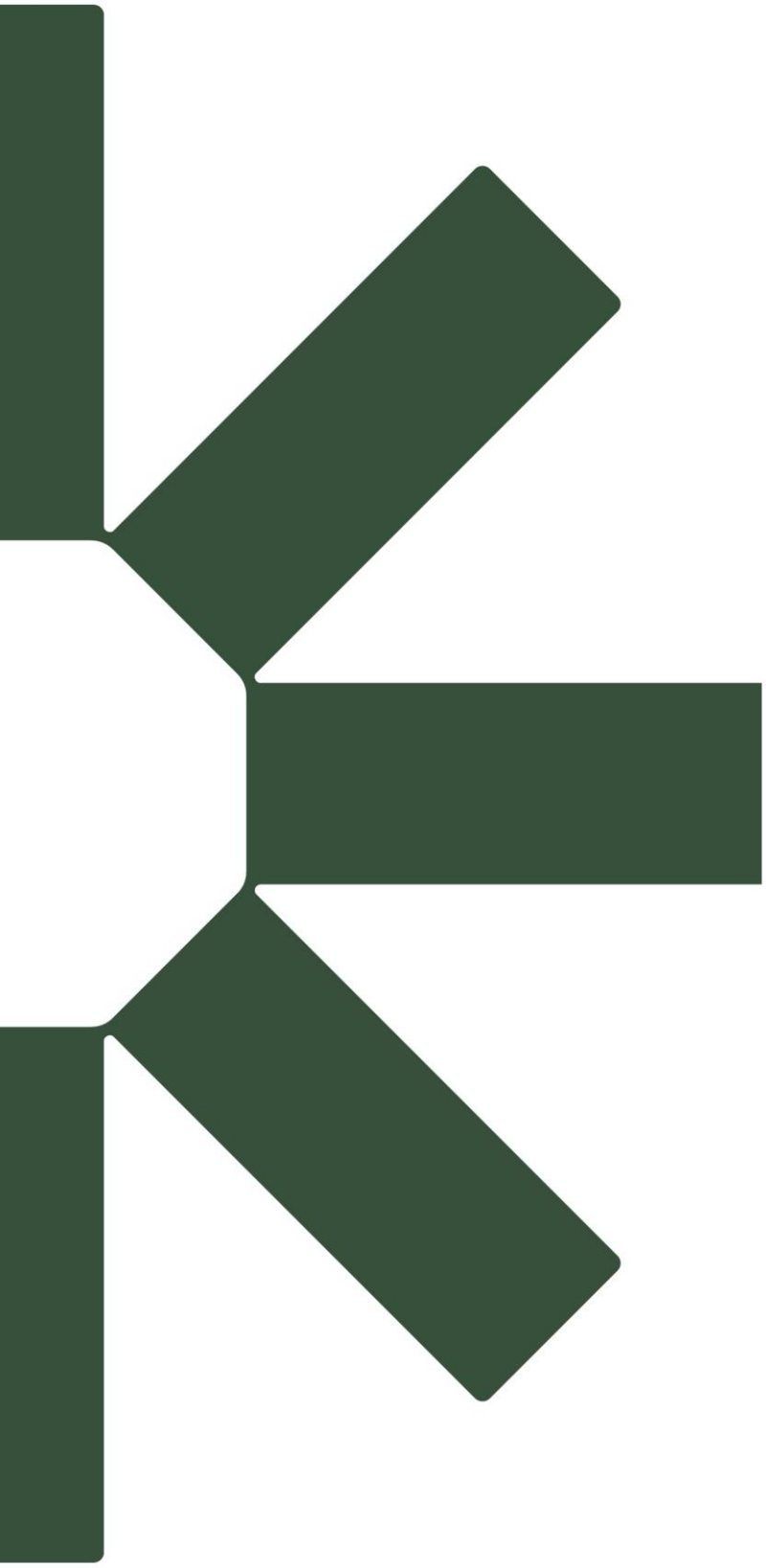
Material	Use	Quantity on site	Estimated quantity per annum	Storage
Diesel	Plant Machinery (Material Handling Equipment)	2,500l	24,000l	Steel Bunded Tank
Hydraulic Oil	Plant Machinery (MHE)	50l	300l	Sealed plastic drum stored inside flammable liquids cabinet
Engine Oil	Plant Machinery (MHE)	50l	300l	Sealed plastic drum stored inside flammable liquids cabinet

Waste will be minimised where possible, packaging and containers in which waste is delivered will be re used for transportation where appropriate. Where waste is generated it will be sent to a suitably licenced facility for recycling or disposal.

Wardell Armstrong LLP

Arabella Sharrock
Principal Waste Permitting Consultant

Charles Ridell
Technical Director



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