# Operating Techniques

## 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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NT17007-002 Site Layout Plan

# 1.0 Introduction

KAS Metal Trading Limited have commissioned Wardell Armstrong LLP to prepare an Operating Techniques in support of 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, for bulking and onward transportation. WEEE will not be treated onsite.

The following activities proposed to be 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 of waste pending any of the operations D1 to D14) incidental to the recycling operation.

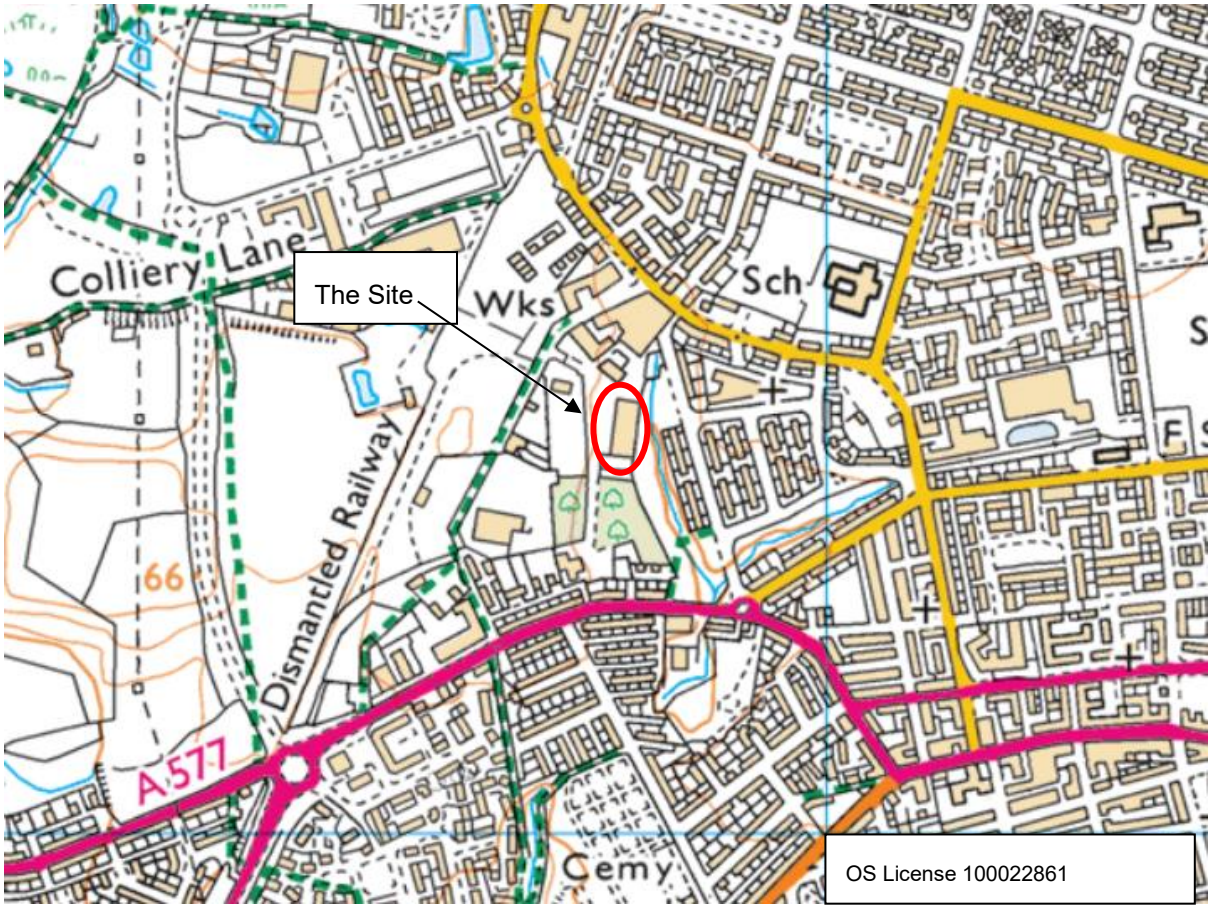
# 2.0 Site Setting

The site is situated on Prestwich Industrial Estate in a predominantly urban area. The industrial estate homes other similar operations including a scrap yard and mechanic directly to the south, a sheet metal contractor to the northwest and a distribution centre to the west.

The area to the east of the facility is mixed residential and commercial. The nearest residential receptors are located 45m east of the site, off Prestwich Street.

A review using DEFRA's Magic Map Tool found there are no statutory designated sites within 1km of the facility boundary. At greater distance from the site (>1km) is the Pretoria Pit Local Nature Reserve (LNR). A Habitats Risk Assessment has been included in the Environmental Risk Assessment for this Permit Application.

**Figure 1 – Site Location**




# 3.0 Proposed Activities

The regulated activities at the site will fall under a Section 5.6 Part A (1) (a)(ii) Activity to store more than 50tonnes of hazardous waste at one time and a waste activity for hand shearing, sorting and storing of non hazardous waste.

The proposed annual throughput for the site will be 50,000 tonnes per annum.

The proposed list of EWC codes to be accepted on site are provided in Appendix 1.

Treatment will be limited to manual sorting, separation, shearing using a portable had shear and cutting using hand-held equipment of ferrous metals and non-ferrous metals into different components for recovery.

No treatment of batteries or WEEE, other than sorting and separating of the waste will be undertaken. Batteries are stored in an external closed container with electrical connectors pointing upwards. The container is impermeable with an acid resistant base and lidded to prevent ingress of water.

**Table 2.1: Waste Activities**

| Activity | D or R Code |
|---|---|
| Size reduction, sorting, baling and bulking of metal scrap for onwards transportation | **R4** Recycling /reclamation of metals and metal compounds |
| Separation of incidental amounts of plastics/ other materials that may be attached to the metal wastes | **R5** recycling/reclamation of other in-organic materials |
| Storage of incoming waste and storage of treated wastes pending transfer/sale | **R13** storage of waste pending any of the operations numbered R1 to R12 |
| Storage of residual waste pending transfer to landfill/appropriate facility | **D15** storage of waste pending any of the operations D1 to D14. |

# 4.0 Waste Acceptance

Up to 50,000tpa will be accepted on site.

Up to 500 tonnes of hazardous waste will be stored on site at any one time due to the mirror coding of cables from construction and demolition wastes.

Waste types will be subject to pre-acceptance and acceptance checks to ensure that all wastes are handled in an appropriate manner and the risks to the environment are minimised.

## 4.1 Waste Pre-acceptance

All waste will be received at the site by pre-arrangement. At the pre-acceptance stage the customer will be asked to provide details of the waste type, waste quantities and other pertinent information so that it can be assessed by a trained member of staff.

Staff assessing wastes for acceptance will have the appropriate training and qualifications to make an informed decision on whether the waste will meet the requirements of the environmental permit and whether the waste will be treated once accepted onsite.

Where waste is listed under a mirror entry in the List of Wastes, the customer must provide adequate sampling results or other evidence to confirm that the waste is non-hazardous otherwise this will be classed as hazardous waste. The waste assessors will confirm whether appropriate sampling and testing or other assessment has taken place and check that the results of testing show the waste is non-hazardous. If wastes are found to be hazardous and are permitted to be accepted on site they will be stored and handled accordingly.

A record will be kept of all waste enquiries, including the following information:

- Date and source of enquiry (name, date and telephone number);
- Name of person dealing with enquiry;
- Name, address and SIC code of the waste producer;
- Waste type, quantity and form of load;

- Six figure waste catalogue code;
- Whether sampling and analysis is required;
- Copy of analysis (where required);
- Agreed date(s) and time(s) for delivery or reason for rejection;
- Name and telephone number of the waste carrier.

The assessor will record their decision, with reasons for rejecting the waste if necessary, and this information will be communicated clearly to weighbridge staff.

## 4.2 Waste Acceptance Procedures

All waste carrying vehicles will be directed to the weighbridge to be weighed in.

All customers' vehicles will be weighed before and after discharging their load, unless the tare weight of the vehicle is recorded, so that loads need only be weighed on entry. Records will be kept regarding the vehicle delivering the waste, the waste type and quantity, any special requirements and the location on site where the waste was tipped.

A record of the waste on site will be maintained and waste will only be accepted where there is sufficient capacity in the appropriate storage bays or containers.

Where possible the waste will be subject to visual inspection at the weighbridge to ensure that it appears in accordance with the pre-acceptance information.

A waste transfer note, including a waste description must be provided for each load. A season ticket may be used for regular deliveries of the same waste from the same source. A check will be made against the waste transfer note and pre-acceptance information to ensure that the waste is as expected and is suitable for deposit on site. The driver will then be directed to appropriate unloading area on the impermeable concrete surfacing. Once unloaded wastes will be moved into the building or appropriate container.

For hazardous waste a consignment note must be provided. Where the consignment note is missing or incomplete the hazardous waste will be rejected and the reason will be recorded on the consignment note (or a separate record if there is no consignment note). Such waste may subsequently be accepted but only where the waste producer has provided properly completed paperwork.

A final visual inspection of all loads will be carried out prior to and during unloading by a suitably competent member of staff. This will identify any non-conforming materials which could have been in the body of the waste container, a bulk vehicle or skip.

In the event that non-conforming material is identified at the weighbridge the vehicle will be directed to park until further checks can be made. This will include contacting the site manager and the carrier's base where necessary, to further confirm the nature of the waste. If these checks confirm the waste is acceptable within the terms of the permit the lorry will be allowed to proceed to the appropriate unloading point. If there is any doubt that the waste is acceptable the waste will be rejected.

## 4.3 Rejection of loads

Non-conforming waste will include any waste that is not specifically listed in the environmental permit, wastes that comprise mainly fine dusty material that may cause a dust nuisance and waste that is odorous and would pose a risk of causing odour beyond the site boundary.

If non-conforming waste is identified following tipping, the following action will be taken:

- where this is impractical or unsafe the waste will be kept in the quarantine area pending disposal at an appropriately permitted site. the site manager will be informed;
- the waste will be moved to the quarantine area;
- the site manager will examine the waste transfer note and any other documentation and the waste to determine whether it is non-conforming waste;
- if the site manager is satisfied that the description of the waste is appropriate and there has been no contravention of the permit, he/she will authorise the continued treatment/recovery;
- if the site manager is not satisfied that the material conforms to the above requirements, he/she will reject the load;
- where possible the waste will be reloaded onto the delivery vehicle and returned to the waste producer
- where this is impractical or unsafe the waste will be kept in the quarantine area pending disposal at an appropriately permitted site.

## 4.4 Outgoing Waste

Waste will be managed on a first in first out basis with bays being cleared on a regular basis. The maximum waste storage times, set out in the fire prevention plan will be observed.

Waste will be transferred to a registered waste carrier and checks will be made to ensure that they are suitably qualified.

Transfer notes or season tickets will be raised providing the six figure waste code, waste quantities and other pertinent details, to ensure full compliance with the duty of care and the Waste Regulations. Permits will be checked for all receiving sites to ensure that they are authorised to accept the waste.

International Waste Shipments from the site will be conducted in accordance with the International Waste Shipment Regulation EC No1013/2006 as amended. Waste will only be sent to authorised countries and the Environment Agency's guidance *Waste: export and import, The controls that apply if you transport waste out of or into England* will be referred to ensuring compliance with the Environment Agency's requirements.

# 5.0 Waste Storage

## 5.1 General

Maximum waste quantities are set out in the fire prevention plan.

A record will be maintained recording where on site hazardous wastes are stored and the quantity in storage.

The waste storage areas and site layout are show on drawing NT17007-002-P0.

## 5.2 Construction/Demolition Metal Wastes

Construction and demolition metal wastes will be stored in purpose-built bays. The bays will be provided with impermeable surfacing which is contained within the building.

Construction/demolition wastes accepted will be metal wastes and cables that can be manually sorted to allow recycling of the metal.

Materials that might give rise to litter are not typically accepted on site as the predominant waste types at the facility are metal scraps.

## 5.3 WEEE

Waste Electronic and Electrical Equipment accepted on site will be in whole form and will exclude fridges/freezers. All WEEE will be stored under cover either in a lidded container or inside the building.

No WEEE will be treated on site and will be stored for the purposes of bulking only. There shall be no dismantling of WEEE.

The appropriate measures for waste storage, segregation and handling at regulated facilities with an environmental permit for the treatment or transfer of WEEE[1] will be followed where appropriate to the site activities.

WEEE will be stored in containers on an impermeable surface and activities that present a fire risk shall not be carried out in the vicinity of the storage area. WEEE will not be stored on site for longer than 6months, typically waste is removed from site within a month.

## 5.4 Batteries

Batteries will be stored in a dedicated shipping container which is watertight, the container is impermeable with an acid resistant base and sealed roof to prevent ingress of water. Batteries are stored with electrical connectors pointing upwards.

The entirety of the shipping container will be cleared each time the batteries are collected for removal off site, meaning that no batteries are left on site longer than two months The total tonnage of batteries on site at any one time will not be in excess of 25tonnes.

## 5.5 POPs Waste

POPs waste may be accepted onsite in the form of WEEE or cables with chemical/ flame retardant coatings. Where identifiable POPs waste is stored in a dedicated container segregated from other wastes. It will be transferred off site for authorised disposal.

Cable previously coded as 17 04 11 are now dual coded as 17 04 10* also and are treated as hazardous until it is demonstrated otherwise via testing. These cables are kept in their own bay segregated from other waste streams and are on an impermeable surface.

Large domestic applicates accepted on site may contain POPs, specifically heat pump tumble dryers. These will be kept separate to all other non-hazardous non-pops WEEE such as white goods and vented/condenser tumble driers. POPs WEEE will be stored in a separate sealed container to prevent any rainwater ingress.

# 6.0 Environmental Management Systems

KAS Metal Trading Limited operate the site in compliance with their EMS and ISO14001. The Company have complete control over site operations, maintenance, competence and training, prevention of accidents, organisation and document management and records.

[1] https://www.gov.uk/guidance/waste-electrical-and-electronic-equipment-weee-appropriate-measures-for-permitted-facilities/4-waste-storage-segregation-and-handling-appropriate-measures

Adherence to the management system will ensure that regular training, checks and preventative maintenance are carried out at the facility, along with promoting an ethos of continuous improvement to site operations.

The site will be under the control of a Technically Competent Manager who holds the appropriate qualifications. The TCM will ensure that their site attendance complies with Environment Agency requirements and a record kept.

# 7.0 Amenity Measures

## 7.1 Dust and Litter

Wastes that comprise mainly fine dusty materials will not be accepted on site.

Measures will be taken to minimise any emissions of dust. Any wastes that may give rise to dust will be received in vehicles that are sheeted or enclosed. Tipping' unloading heights will be minimised.

Wastes will be stored within the confines of a bay, below the height of the bay wall and inside a building.

The site will be inspected daily and any litter will be collected and placed in an appropriate bay or container.

## 7.2 Pests and Odour

Pests and odour are not considered likely as no putrescible waste is to be accepted. Odorous wastes will not be permitted on site.

Wastes will be turned round on a regular basis and in line with the maximum storage times set out in the fire prevention plan for combustible waste.

A daily inspection of the site will be carried out by the site manager or another trained member of staff. They will record any incidence of dust, litter, odour or evidence of pests. This will be reported to the site manager and the cause will be investigated,

If any wastes are found to be causing an odour they will be prioritised for removal from site.

Should evidence of pests be detected a pest contractor will be brought to site to deal with the problem.

## 7.3 Noise

All plant will be maintained in accordance with the manufacturer's recommendations and will be subject to regular servicing in order to minimise noise.

The site is located on an industrial estate surrounded by other industrial activities. Waste treatment and loading takes place inside the building, which will provide a degree of noise attenuation. Waste deliveries will only occur during the working day.

A noise management plan has been produced for the site. The Noise Impact Assessment did not identify any issues with noise above background levels from the site.

## 7.4 Leaks and Spillages

All plant and equipment will be serviced and maintained in accordance with the manufacturer's recommendations, minimising the risk of spills from site plant and equipment.

All areas where waste will be received, treated or stored will be provided with impermeable concrete surfacing.

Any liquids stored on site for plant maintenance will be kept in appropriate lidded containers in bunds or drip trays.

In the event of a spill, this will be cleared using suitable absorbent material. The waste absorbent will then be placed into a suitable bin or container awaiting removal from the site.

In the event of a fire, firewater will be contained on the building floors using a boom or flood sacks placed at the building entrance. Externally to the buildings the use of temporary bunds and drain covers, to prevent runoff, will be used. Further detail is provided in the fire prevention plan.

# 8.0 Monitoring and Record Keeping

The site will be inspected daily with staff carrying out a visual assessment around the site boundary to check for emissions of contaminated run-off, noise and particulates.

Site inspections will include the condition of site infrastructure, including impermeable surfacing, tanks, pipework and secondary containment infrastructure.

Should any issues be noted these will be raised with site management and appropriate remedial action will be agreed. Details of the inspection and any remedial action will be recorded in the site diary.

The site diary will be made available to warranted officers of the Environment Agency on request.

Should any incident have the potential to cause significant emissions, the Environment Agency will be informed by telephone and remedial action will be agreed with the local environment officer.

Records will be kept on site, in either electronic or hard copy format, recording:

- pre-acceptance details for each waste stream;
- waste transfer notes or consignment notes for incoming and outgoing wastes;
- details of any rejected loads and any associated remedial action taken;
- details of plant and infrastructure inspections, including any maintenance that is required;
- a record of daily checks for dust, noise etc and
- details of any complaints received and the action taken to resolve them.

# 9.0 Site Closure/Surrender Plan

A Site Closure Plan will be developed to ensure the site will be safely decommissioned without causing pollution or harm and the site is returned to a satisfactory state, that is, a similar condition to that which existed prior to permit issue.

All raw materials will be removed from site in an appropriate manner. Where possible these will be returned to the supplier, possibly under a sale or return agreement, otherwise they will be sent for reuse or recycling at a suitable permitted facility.

Where possible, all waste materials will be processed through the plant and removed from site for recovery. All remaining wastes will be removed from site and will be recycled or disposed of in accordance with the requirements of the The Waste (England and Wales) Regulations 2011, or the relevant waste legislation at the time of decommissioning.

All plant will be emptied and, if necessary, cleaned prior to dismantling to minimise the potential for fugitive emissions.

The impermeable surfacing and drainage will be maintained until all plant decommissioning is complete to guard against spills or leaks during decommissioning.

Soils samples will be undertaken, if required, so that the condition of the site at decommissioning can be compared to that at commencement of the facility. However, inspection and maintenance of the concrete surfacing at the site will be the main mechanism for ensuring no pollution occurs and where records show high standards of containment throughout the life of the site sampling may not be necessary.

The methodology used to decommission process plant, and other structures will minimise the impact of:

- noise;
- odour; and
- disturbance to the environment.

Protection of the environment will be a priority and no risk to air, land, water or human health will be experienced during closure and decommissioning of the site, which will be subject to the Environmental Management System requirements.

**Wardell Armstrong LLP**

**Arabella Sharrock**
Principal Waste Permitting Consultant

**Charles Riddell**
Technical Director

# Appendix 1 Proposed EWC Codes

## Operating Techniques

**Unit J Prestwich Industrial Estate**

**KAS Metal Trading Limited**

11 August 2025

Proposed list of EWC Codes for Kas Metal Trading Limited

| | |
|---|---|
| **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 11 | Waste metal |
| **15** | **WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS 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 from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)** |
| 16 01 17 | Ferrous metal |
| 16 01 18 | non-ferrous metal |
| 16 01 21* | hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14 |
| 16 01 22 | components not otherwise specified |
| **16 02** | **wastes from electrical and electronic equipment** |
| 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 (WEEE cable) |
| 16 02 16 | components removed from discarded equipment other than those mentioned in 16 02 15 |
| **16 06** | **Batteries and Accumulators** |
| 16 01 01* | lead batteries |
| 16 01 02* | Ni-Cd 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 01 | copper, bronze, brass |
| 17 04 02 | Aluminum |
| 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 09* | metal waste contaminated with hazardous substances |
| 17 04 10* | cables containing oil, coal tar and other hazardous substances |
| 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 |

# Drawings

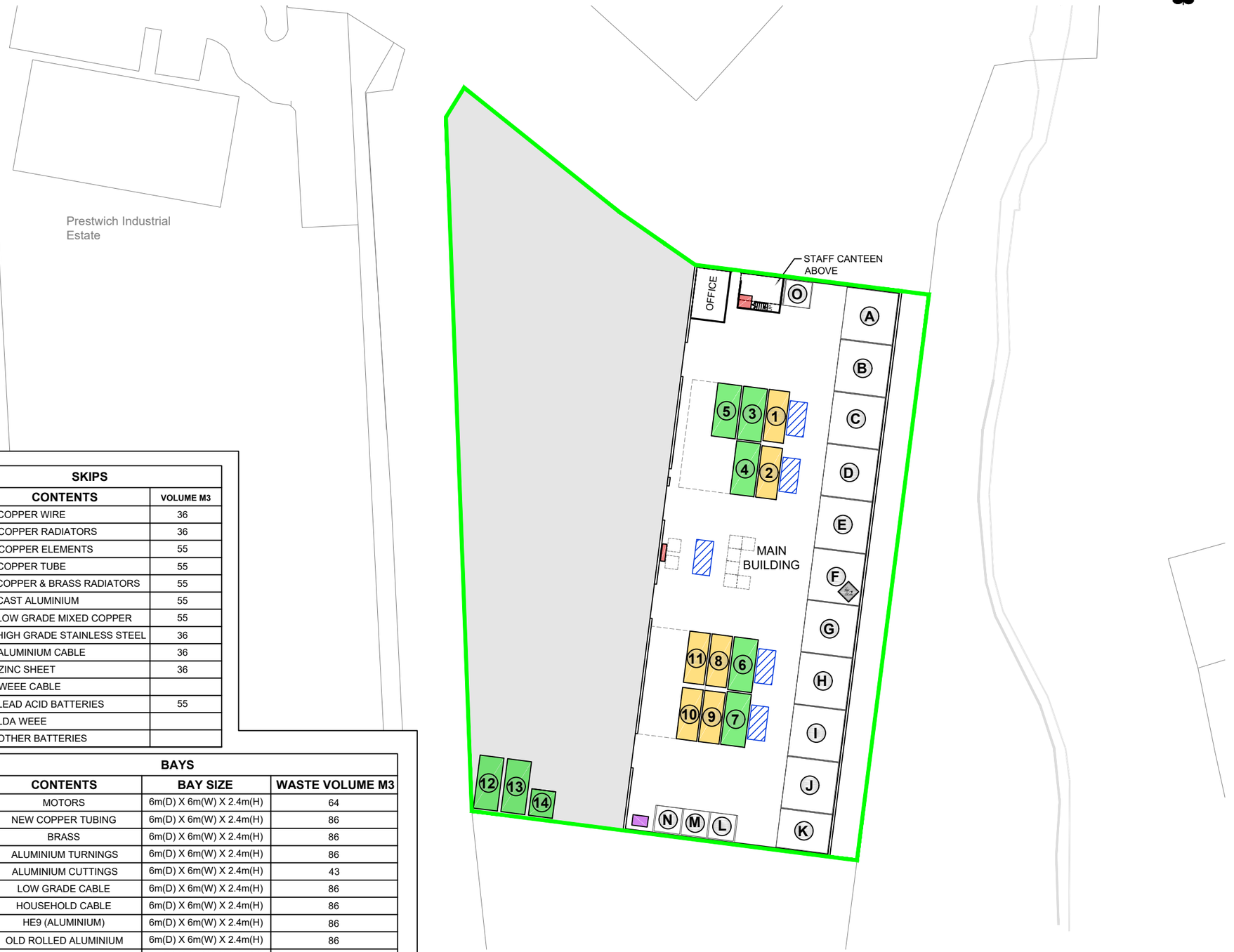
## Operating Techniques

### Unit J Prestwich Industrial Estate

### KAS Metal Trading Limited

11 August 2025

DO NOT SCALE FROM THIS DRAWING




LEGEND

- ENVIRONMENTAL PERMIT BOUNDARY
- EXTERNAL SURFACING IMPERMEABLE CONCRETE
- 55 YARD SKIP - 6.2m(L) X 2.8m(W) X 3.3m(H)
- 40 YARD SKIP - 6m(L) X 2.4m(W) X 2.5m(H)
- FLAMMABLE LIQUIDS
- DIESEL TANK - 1.8m(L) X 1.22m(W) X 1.22m(H)
- MOBILE PLANT MACHINERY
- PERSISTENT ORGANIC POLLUTANTS

LAYOUT PROVIDED BY ENVIRONMENTAL COMPLIANCE LTD ENTITLED SITE LAYOUT PLAN, DRAWING No.KMTL.01.02-02, DATED 03-11-23

**SKIPS**

| NO. | CONTENTS | VOLUME M3 |
|---|---|---|
| 1 | COPPER WIRE | 36 |
| 2 | COPPER RADIATORS | 36 |
| 3 | COPPER ELEMENTS | 55 |
| 4 | COPPER TUBE | 55 |
| 5 | COPPER & BRASS RADIATORS | 55 |
| 6 | CAST ALUMINIUM | 55 |
| 7 | LOW GRADE MIXED COPPER | 55 |
| 8 | HIGH GRADE STAINLESS STEEL | 36 |
| 9 | ALUMINIUM CABLE | 36 |
| 10 | ZINC SHEET | 36 |
| 11 | WEEE CABLE | |
| 12 | LEAD ACID BATTERIES | 55 |
| 13 | LDA WEEE | |
| 14 | OTHER BATTERIES | |

**BAYS**

| ID | CONTENTS | BAY SIZE | WASTE VOLUME M3 |
|---|---|---|---|
| A | MOTORS | 6m(D) X 6m(W) X 2.4m(H) | 64 |
| B | NEW COPPER TUBING | 6m(D) X 6m(W) X 2.4m(H) | 86 |
| C | BRASS | 6m(D) X 6m(W) X 2.4m(H) | 86 |
| D | ALUMINIUM TURNINGS | 6m(D) X 6m(W) X 2.4m(H) | 86 |
| E | ALUMINIUM CUTTINGS | 6m(D) X 6m(W) X 2.4m(H) | 43 |
| F | LOW GRADE CABLE | 6m(D) X 6m(W) X 2.4m(H) | 86 |
| G | HOUSEHOLD CABLE | 6m(D) X 6m(W) X 2.4m(H) | 86 |
| H | HE9 (ALUMINIUM) | 6m(D) X 6m(W) X 2.4m(H) | 86 |
| I | OLD ROLLED ALUMINIUM | 6m(D) X 6m(W) X 2.4m(H) | 86 |
| J | MIXED COPPER | 6m(D) X 6m(W) X 2.4m(H) | 86 |
| K | DRY CU WIRE | 6m(D) X 4.5m(W) X 2.4m(H) | 17 |
| L | LEAD | 3m(D) X 3m(W) X 2.4m(H) | 21 |
| M | STAINLESS SOLIDS | 3m(D) X 3m(W) X 2.4m(H) | 43 |
| N | S&A's | 3m(D) X 3m(W) X 2.4m(H) | 17 |
| O | GM SOLIDS | 3m(D) X 3m(W) X 2.4m(H) | 17 |



| REVISION | DETAILS | DATE | DR'N | CHK'D | APP'D |
|---|---|---|---|---|---|
| | | | | | |

CLIENT: KAS METAL TRADING LTD

PROJECT: ENVIRONMENTAL PERMIT APPLICATION
UNIT 1
ATHERTON, MANCHESTER

DRAWING TITLE: SITE PLAN

PRELIMINARY

| DRG No. | REV | SUIT. CODE |
|---|---|---|
| NT17007-002 | P0 | |

| DRG SIZE | SCALE | DATE |
|---|---|---|
| A3 | 1:500 | 18-06-25 |

| DRAWN BY | CHECKED BY | APPROVED BY |
|---|---|---|
| DR | | |

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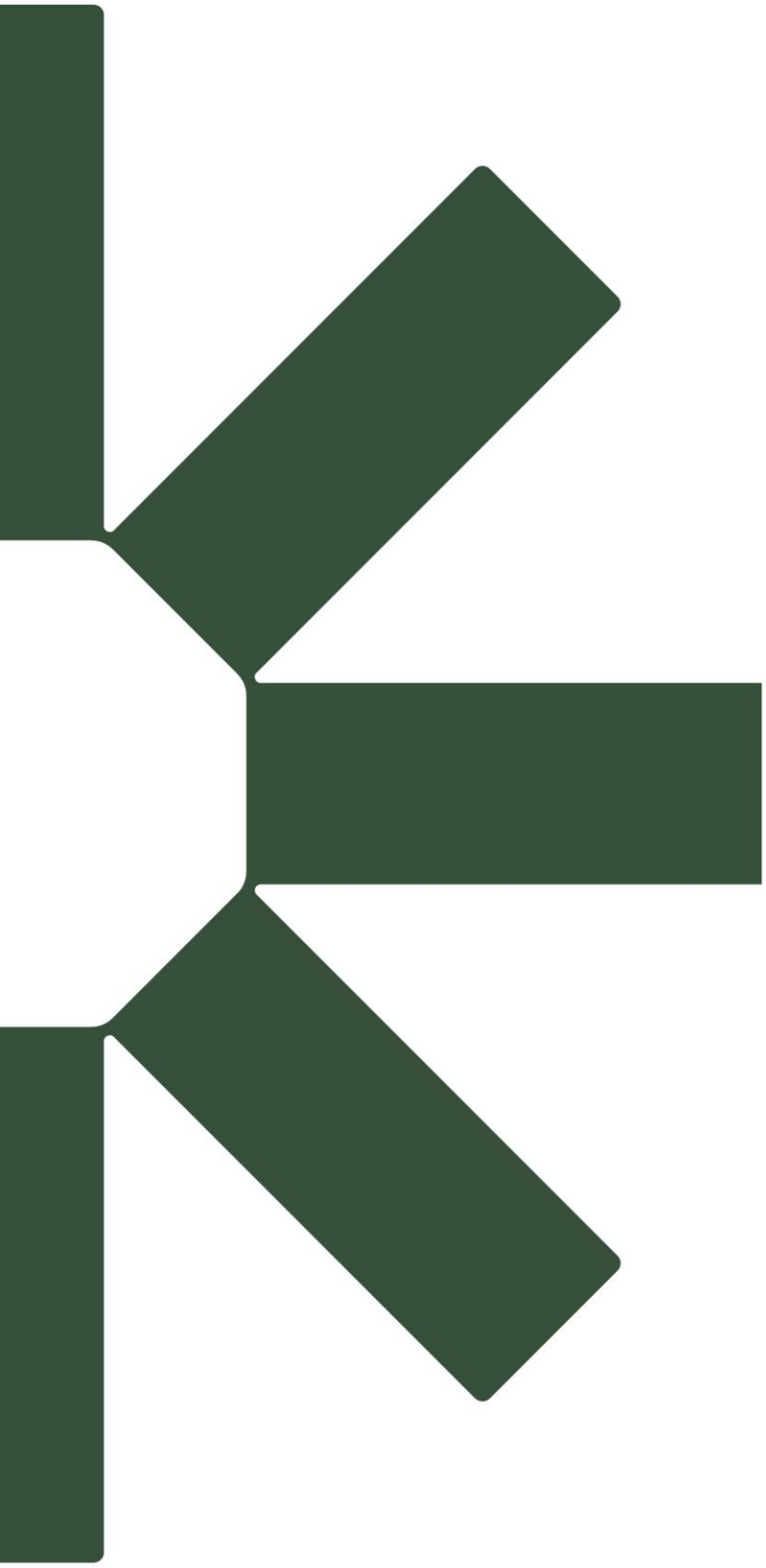

Making Sustainability Happen