EUROPEAN METAL RECYCLING LIMITED
EDMONTON

ENVIRONMENTAL MANAGEMENT PLAN

Albert Works
Kenninghall Road
Edmonton
London
N18 2PD

May 2021

Project Reference : YEDE - 03	Dated : May 2021
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Contents

Introduction

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The following Environmental Management Plan (formerly Working Plan) has been produced by European Metal Recycling Ltd here after referred to as (EMR) to support the Environmental Permit (Permit no. EPR/EP3091NT) for EMR Edmonton, Albert Works, Kenninghall Road, Edmonton, London N18 2PD operating as a Metal Recycling Site (MRS) submitted to the Environment Agency here after referred to as EA. The content of this plan and the assessments contained within have been produced based on the requirements as set out in the EA's Environmental Management Plan guidance document 'How to comply with your environmental permit' (formerly Working Plan guidance and specification document).

This environmental management plan (EMP) is the core document of the site's Environmental Management System and environmental management of the site is also detailed in the Environmental Protection Procedures (EPPs) listed in the index in the Appendix (section 8 of this EMP outlines the site's EMS)

EMR Edmonton here after referred to as (the site) is situated at grid reference TQ35106 92407.

EMR is one of the largest metal recycling companies in the UK and operates many permitted and exempt metals recycling facilities throughout the UK and Europe.

The companies registered office is:

European Metal Recycling Limited
Sirius House
Delta Crescent
Westbrook
Warrington WA5 7NS

Registered in England and Wales No. 2954623

EMR specialises in the recovery and recycling of scrap metals from industry, commerce and householders. Ferrous and non-ferrous metals are primarily recovered with further recovery processes also being developed to recover secondary materials such as plastics, glass, aggregates and tyres for further recycling. The processes used by EMR across its business include sorting and grading into metal types, flame cutting, pressing and shearing of bulk materials, shearing of metals, granulating, depollution of vehicles and the removal of ODS from refrigeration equipment (at specialist sites only) and the use of unique mechanical and physical sorting methods to achieve maximum recovery of a range of metals and other materials for recycling.

Section 1 - Site description and characterisation of risk source

1.1 Specified site and waste management operations

The EMR Edmonton site is operated by EMR as a storage and treatment facility for recycled metals and associated materials generated as part our secondary recovery processes. This is otherwise classified as a 'Keep Treat and Dispose' operation as classified in section 35 of the Environmental Protection Act 1990. These waste management operations are defined by the 'R' (Waste Recovery) codes classified in Table 1 as follows.

Specified waste management operations *(please refer to permit No. EPR/EP3091NT – pages 10-24).*

The site is situated within an industrial estate, adjacent to a railway line (Abelio Anglia/ Network Rail) running along the eastern boundary of the site and the North Circular Road runs east- west directly to the south of the site. The nearest residential housing is Montague Road, located 0.25km to the North-West of the site.

Under the specified waste management operations (outlined in the permit and exemptions) the following activities may be undertaken on site using fixed or mobile plant:-

- Mechanical / manual sorting
- Granulation and processing of non-hazardous plastic insulated copper cables.
- Granulation and processing of plastic insulated copper cables containing POPs and or designated as hazardous waste
- Bulking
- Baling
- Cable Stripping
- Cold flame cutting / oxyacetylene cutting
- Shearing / dismantling
- Size reduction / material separation
- Storage prior to bulk removal and export
- Cast Iron Breaking
- Depollution of End of Life Vehicles (ELV)
- Management of transport of materials via road in and out of the site

1.2 Permitted wastes

The Environmental Permit states the total annual throughput as 349,000 tonnes of ferrous and non-ferrous, waste (scrap) inputs and outputs will bee controlled so as not to exceed these tonnage throughput limits

The permit does however specify maximum materials storage limits these are detailed in Table 2 as follows.
Table 2 – Site maximum storage limits

Category of Waste	Maximum Waste Accepted
Total waste per annum	349,000 tonnes
Hazardous waste per annum	69,000 tonnes

Ferrous and non-ferrous metal scrap are the most common materials handled at the site however there are a wide range of other associated materials generated as part of EMR's recovery processes that may also be imported to and exported from the site. The European Waste Catalogue (EWC) codes that cover materials accepted are listed in Table 3 as follows.

Table 3 – EWC Codes for wastes that may be accepted or encountered at site.

Chapter From European Waste Catalogue that codes have been selected	Sub-section	Code
02 – Wastes from Agriculture, Horticulture, Aquiculture, Forestry, Hunting and Fishing, Food Preparation and Processing	None	02 01 10 waste metal
10 – Wastes from thermal processes	10 02 Wastes from the iron and steel industry	10 02 10 Mill Scales (ferrous and non-ferrous)
	10 03 wastes from aluminium thermal metallurgy	10 03 02 anode scraps
	10 08 wastes from other non-ferrous thermal metallurgy	10 08 14 anode scrap

11 – Wastes from Chemical Surface Treatment and Coating of Metals and other Materials; Non-Ferrous Hydro-Metallurgy	11 05 wastes from hot galvanising processes	11 05 01 hard zinc
		11 05 02 zinc ash
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 13 welding wastes
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
		15 01 05 Composite 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 04* end-of-life vehicles (M)
		16 01 06 end-of-life vehicles, containing neither liquids nor other hazardous components
	16 02 wastes from electrical and electronic equipment	16 02 16 components removed from discarded equipment other than those mentioned in 16 02 1516 01 17 ferrous metal16 01 16 tanks for liquefied gas

	16 06 batteries and accumulators	16 06 01* lead batteries (A)16 01 18 non-ferrous metal16 01 17 ferrous metal
		16 06 02* Ni-Cd batteries (A)16 02 11* discarded equipment containing chlorofluorocarbons, HCFC, HFC (M)16 01 18 non-ferrous metal
		16 06 04 alkaline batteries (except 16 06 03)16 02 15* hazardous components removed from discarded equipment (A) 16 02 14 discarded equipment other than those mentioned in 16 02 09 to 16 02 13
		16 06 05 other batteries and accumulators16 02 16 components removed from discarded equipment other than those mentioned in 16 02 1516 02 15* hazardous components removed from discarded equipment (A)
	16 08 Spent catalyst	16 08 01 spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)16 06 01* lead batteries (A) 16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15
17 Construction and Demolition Waste	17 04 Metal (including their alloys)	17 04 01 copper, bronze, brass16 06 03* mercury-containing batteries (A)16 06 02* Ni-Cd batteries (A)
		17 04 02 aluminium16 06 04 alkaline batteries (except 16 06 03)16 06 03* mercury-containing batteries (A)
		17 04 03 lead16 06 05 other batteries and accumulators16 06 04 alkaline batteries (except 16 06 03)
		17 04 04 zinc16 08 01 spent catalysts containing gold, silver,

		rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)16 06 05 other batteries and accumulators
		17 04 05 iron and steel16 08 01 spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)
		17 04 06 tin17 04 01 copper, bronze, brass
		17 04 07 mixed metals17 04 02 aluminium17 04 01 copper, bronze, brass
17 Construction and Demolition Wastes (including road construction)	17 04 metals (including their alloys)	17 04 10* cables containing oil, coal tar and other hazardous substances (MH) 17 04 11 cables other than those mentioned in 17 04 1017 04 03 lead17 04 02 aluminium
		17 04 04 zinc17 04 03 lead
		17 04 05 iron and steel17 04 04 zinc
19 Material from Waste and Water Treatment	19 01 Incineration of pyrolysis of waste	19 01 02 ferrous materials removed from bottom ash
	19 10 Shredding of metal containing wastes	19 10 01 iron and steel waste
		19 10 02 non-ferrous waste17 04 07 mixed metals17 04 06 tin
20 Municipal Waste and similar materials from commerce and industry	20 01 Paper and Cardboard	20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23, and 20 01 35
		20 01 40 metals

* - Indicates that waste may be classified as hazardous, (A) indicates that waste is an absolute entry within the European Waste Catalogue, (M) indicates that waste is a mirror entry within the European Waste Catalogue and has been assessed to be containing hazardous liquids or other hazardous components.

This list is anticipated to cover all eventual process materials that may be handled by EMR at the site it is considered to be the best fit to the existing waste management permit in the absence of a code list issued by the EA.

1.3 Hours of operation

Normal Operational Hours:

Mon- Sat	06:00 – 20:00
Sun & Bank Holidays	09:00 – 20:00 Preventative Maintenance Only

The hours of operations are dictated by planning permission requirements and must be strictly adhered to and operational activities cannot take place outside these hours.

1.4 Staff Competency and Training

The site will be staffed by person (s) who are Technically Competent and have undergone technical competency training or a technically competent person shall be available for the site. Certain relevant key staff (e.g. depot manager) will undergo WAMITAB / NVQ training (or equivalent) or be scheduled to attend the relevant course. At the time of writing the TCM for the EMR Edmonton depot is Lewis Payne.

The Environment Agency must be informed if there is a change in the Technically Competent Manager (TCM) for the site.

1.5 Environmental Permit (and EMP)
The Environmental Permit (permit no. EPR/EP3091NT) will be displayed in a prominent place (e.g. notice board) and replaced by a new copy if it is removed or is defaced in anyway.

The Depot Manager (Technically Competent person) and other key staff / supervisors will be familiar with the Environmental Permit and its requirements.
If there are changes of the depot manager for the site the Environment Agency must be informed. If there are any significant changes in the operation of the site the Environment Agency will be informed (and the Environmental Permit may need to be varied).

Subject to any conditions within the Environmental Permit, prior written consent will be gained from the Environment Agency before any specific changes are made to the Environmental Management Plan. (EPP7.1)

Section 2 - Site engineering for pollution prevention and control

2.1 Engineered site containment and drainage systems (includes effluent collection systems)

2.1.1 Impermeable Site Surfaces

All storage of scrap metal including end of life vehicles prior to processing will be undertaken on an impermeable surface, comprising high specification concrete with reinforced construction, served by a sealed drainage system.

The impermeable surfaces will be maintained to prevent fluids running off to un-surfaced areas, and to prevent the transmission of fluids through the pavement or its construction joints.

Processed materials will be stored on a suitably maintained hard standing prior to dispatch from site.

Impermeable surfacing specification: the impermeable surface will comprise of a 200mm thick concrete CSO Fibrin - polypropylene fibre (to prevent shrinkage) with one layer of 252mm reinforced mesh spaced 50mm off the base of the concrete layer and underlain by a 1200 gauge membrane. The surface is constructed as separate slabs or bays with contraction and expansion joints and sealed with hot poured Pli-astic sealant. The concrete layer is supported by an underlying Type 1 limestone sub base.

2.1.2 Sealed Drainage Systems and Trade Effluent discharge

Any surface water run off from impermeable surfaces will pass into the sealed drainage system (no direct runoff); the drains will then feed the surface water runoff through an oil - water interceptor to separate any oil from surface water. Once the runoff has passed through the interceptor (35,000L) equipped with hydrobrake and penstock valve, the clean effluent will be discharged to surface water drains (managed and controlled by Southern Water), prior to discharge to natural waters (River Stour). The surface water runoff at the outfall will be inspected on a regular basis by the Depot Manager (see EPP3.5 and Site Drainage Plan).

2.1.3 Bunded Areas

Potentially contaminating liquids, such as fuels and oils shall be stored on site in appropriately engineered containers and bunds designed to a minimum 110% holding capacity for a single tank. Where two or more tanks are held within one secondary containment system or bund, the bund will hold at least 110% of the biggest tank's maximum storage capacity or 25% of the total maximum storage capacity of all the tanks, whichever is the greatest. All bunds will be constructed of materials impermeable

to water and oil. Engineered catch systems will be employed in areas where fluid spills may potentially occur.

A secondary bund will be required if the tanks are not double skinned.

Tanks and bunds are inspected weekly to ensure their continued integrity. Any defects observed will be made temporarily secure by the end of the working day with permanent repairs being instigated within 7 working days. Inspections, defects, damage and repairs will be recorded in the site diary and on a TCM Event Log (and additionally the site's environmental files as appropriate).

Where authorised contractors are used to remove accumulations of contaminated liquids from bunds on site, copies of transfer notes will be retained within the sites environmental files for an appropriate period as detailed in section 7.2, Table 4.

2.1.4 Maintenance Schedules

All inspections, defects, damage, maintenance and repairs will be recorded in the appropriate site files, TCM Event Log or the sites diary / log.

Drainage systems including gullies, drains, drain covers and interceptors will be inspected on a daily basis. Site interceptors shall be emptied by an authorised contractor in accordance with the manufacturer's recommendations.

All operational mobile plant and fixed equipment will be maintained and inspected by a competent person and records of inspections and maintenance schedules shall be retained on site.

Damaged and worn site surfaces will be repaired as required as part of the on-going site maintenance program. The site manager will undertake regular checks of the sites surfaces to ensure that they are maintained in good condition and repairs across the site are anticipated and planned for.

The company makes financial provision for the maintenance of the site on an annual basis and repairs are undertaken at times when shutdown periods are planned or when stocks on site can be relocated to appropriate alternative storage areas.

Section 3 - Site infrastructure

3.1 Provision of Site Identification Board

A site identification board will be provided at the site entrance detailing the following information:

- Site Name & Address
- Environmental Permit Holder Details
- Operators Details
- EMR Emergency Out of Hours Contact Numbers
- Opening Times
- Environmental Permit No.
- Environment Agency Contact Numbers
- Operational hours

In the event that the board is damaged or information on it needs to be updated a new board will be ordered and fitted within one month.

3.2 Site security and fencing

The site will be secured by a combination of fencing and bunding which prevents access on all sides. The offices will be located adjacent to the main weighbridges and where possible close to the site entrance, all entrance gates to the site will remain locked outside of operating hours. Gates will be provided at the entrance and the site will be fenced to a minimum height of 1.5 metres.

The ELV treatment area will be contained within a secure building, which is locked when the site is unattended.

The site will be kept closed and secure at all times when unattended. The security measures detailed will be inspected at commencement of each working day. Any defects shall be made secure by temporary repair by the end of that working day and shall be fully repaired within seven working days of the damage being identified.

All defects, damage and repairs will be recorded in the site diary or the sites maintenance logs. Sites will also employ additional security methods such as CCTV and motion sensors.

3.3 Lighting

The site will be provided with adequate lighting which will be utilised during times of poor visibility arising either due to adverse weather or seasonal changes in daylight

hours. Some flood lights may be located around the perimeter of the site but also in the vicinity of the office and workshop areas. The depot is located within a large industrial estate away from any housing.

The lighting will be inspected at commencement of each working day. Any defects shall be fully repaired within seven working days of the damage being identified.

All defects, damage and repairs will be recorded in the site diary, Event Log and the sites maintenance logs as appropriate.

Section 4 - Site operations

4.1 Control of mud and debris

The site benefits from a substantial impermeable pavement extended across pre-treatment storage areas, processing areas and the sites main access roads; therefore mud and other debris are unlikely to be tracked onto the road from inside the site. In addition to the provision of impermeable site surfaces where required a mechanical sweeper will be provided to remove any other debris that could potentially be tracked onto the road from inside the site.

The access road to the site will be visually inspected on a regular basis. In the event that mud or debris is observed which is likely to have arisen from the site, action will be taken as soon as possible to resolve this issue. The site will either maintain its own sweeping equipment or use an appropriate contractor available at short notice to remove mud and debris. Any abnormal event outside of day to day operations where the attendance of sweeping contractor is required, such as a specific load brought to site which has caused mud and debris, will be recorded in the site diary (EPP4.4).

4.2 Potentially polluting leaks and spillages

Storage of liquids will be undertaken on site in line with section 2.1.3 of the working plan. Regular maintenance and checks will be carried out on all plant and equipment to prevent and identify any potentially polluting leaks.

Equipment and materials for cleaning up leaks and spillages will be installed and maintained on site and with procedures for its use and storage locations made known to all operatives. Any contaminated absorbent materials used to clean up spills will be disposed of at a suitably permitted facility.

Any minor spillage will be cleaned up utilising the spill kit materials maintained on site.

Where a major potentially polluting spillage has occurred, immediate action will be taken to prevent the spillage entering surface water drains, watercourses or contaminating un-surfaced ground. The spillage shall be cleaned up immediately using absorbent materials and placed in sealed containers, and the Environment Agency shall be informed (these actions also form part of the site's Emergency Plan). Any significant potentially polluting incidents will be recorded in the companies' Event Log, central environmental files or the sites Environmental Files and / or the site diary (EPP5.2)

4.3 Fires on site

In the event of a fire, immediate action will be taken and the site Emergency Plan will be enacted and strictly followed. If it is safe to do so, trained personnel on site will attempt to extinguish the fire.

If staff on site are unable to extinguish the fire, the affected areas shall be evacuated and the following actions will be undertaken:

- In the event of a fire that can not be extinguished safely with on-site equipment, the Fire Brigade will be contacted by dialling 999.

- The site Emergency Plan will be initiated

- The site Fire Prevention Plan must be followed

- The site manager will evacuate all staff and visitors from potentially hazardous areas and direct them to the nominated fire assembly point and ensure all relevant personnel are present.

- The staff at the weighbridge will be informed for the purposes of directing emergency service vehicles.

- The following EMR personnel will be contacted to notify them of the situation:

  Operations Manager
  Health and Safety Co-ordinator
  Environmental Co-ordinator

- Once the fire brigade are called and the relevant EMR staff notified, the Environment Agency will also be notified by either their main number within office hours or via the Environment Agency Emergency No. 0800 80 70 60 (outside of office hours). An incident reference will be requested from the EA for future reference.

- Where required appropriate contractors will be instructed to deal with fire water and other linked residues.

All minor fire incidents are recorded in the site diary; any significant potentially polluting incidents will be recorded in the companies' central environmental files or the site's, Event log, Environmental Files and / or the site diary (EPPs 5.1, 5.3)
[See also site Fire Prevention Plan (FPP) and Emergency Plan].

4.4 Waste acceptance control systems and procedures

4.4.1 Waste acceptance

Vehicles arriving at the site enter the main gates, drive onto the weighbridge located inside the main entrance. At this point, the load is checked visually for its suitability for processing at the site and checked against the description of the load provided on the waste transfer note/weighbridge ticket. In the event that unacceptable wastes are discovered at this point, the vehicle shall be quarantined and / or rejected from site and the details recorded on an Event Log.

Ferrous metals and non-ferrous metals will be weighed into site via the main weighbridge however smaller loads of non-ferrous metals may be directed to the non-ferrous shed to have smaller materials individually weighed, inspected and accepted.

If the materials are determined as acceptable by initial inspection, the vehicle will directed to a suitable area to discharge its load. The tipping areas may vary depending upon various factors such as stocking levels, material type and processing that will be required. Once the load is tipped, the materials are again inspected by the off-load inspector or plant operator to determine whether they are acceptable. Should unacceptable materials be observed at this point, contrary items are returned to the vehicle and rejected from site or quarantined for further instruction by the depot manager. The vehicle driver and /or customer will be notified of the reasons for the rejection. Radio communications will be maintained between weighbridge, yard inspectors and / or plant operators during the acceptance of waste at the site.

Once a load has been tipped, inspected and deemed as acceptable, the vehicle will be cleared to return to the weighbridge where the tare weight of the material tipped is determined, and the final weighbridge ticket will be issued.

Written records of all rejections are maintained by weighbridge staff. The Environment Agency will be informed of any loads quarantined on site or rejected from site that pose a significant risk of pollution to the environment or risk to human health outside of the site boundary (EPP1.1 -1.11).

4.4.2 Non-conforming wastes

In the event that non-conforming materials are detected after initial inspections, these will be segregated on discovery and quarantined in an appropriate area. An assessment will be made of the properties of the waste, and if necessary specialist advice obtained regarding handling and disposal.

4.4.3 Hazardous Wastes

The site only accepts those wastes detailed in Table 3 however other hazardous wastes may be generated as part of treatment processes. Any hazardous wastes accepted at the site will only be accepted with the appropriate consignment paperwork and transfer notes in accordance with the Hazardous Waste Regulations 2005 and industry guidance. These wastes will then be stored in appropriately engineered areas.

Any contravening hazardous wastes discovered in loads will be isolated and traced back to there source supplier where possible. If the source of the hazardous waste cannot be ascertained, then the waste will be quarantined until it can be safely treated on site or until it can be removed from the site for reprocessing or disposal at an appropriately permitted facility (EPP1.3).

4.4.4 POPs/Hazardous Plastic Cables

Plastic insulated copper cables are present in many categories of WEEE and are also commonly separately collected. The plastic insulation on the cables may contain high levels of hazardous substances, including but not limited to, POPs (Persistent Organic Pollutants) for example brominated flame retardants. Under new and amended legislation and guidance these materials are to be characterised and classified as hazardous wastes (see POPs Guidance in Appendix 4).

Plastic insulated copper cables will be accepted at the EMR Edmonton site as two main waste types:

1. Non-hazardous plastic insulated cable (EWC 16 02 14 or 17 04 11)
2. Hazardous plastic insulated cable (EWC 16 02 15* or 17 04 10*)

The hazardous cable will be accepted on to the site as two different waste streams:

- WEEE cable 16 02 15*
- Non- WEEE cable 17 04 10*

The two types of hazardous cables will be segregated from the non-hazardous cable but not from each other (both types of hazardous cables will be co-mingled for storage).

Pre-acceptance procedures will be applied to all contracted incoming cable (both hazardous and non-hazardous) facilitated by the completion of a Pre-acceptance form (see Appendix 5) to determine whether cable plastic contains POPs and laboratory analyses may be performed on representative samples of cable to determine if POPs are present in the cable and the calculated levels of POPs. Waste characterisation and classification will be conducted in accordance with WM3 (Environment Agency -

Technical Guidance WM3, Interpretation of the definition and classification of hazardous waste).

Once the pre-acceptance process has been completed the waste plastic cable will be classified as either hazardous cable (includes both types of hazardous cable: 16 02 15* and 17 04 10*) or non-hazardous cable and the relevant EWC code will be applied, (based on the WM3 classification outlined above) and stored and processed as the two separate streams (stored separately and processed separately).

On arrival at the Edmonton site all cable loads will be inspected and checked against the waste description as shown on the accompanying Hazardous Waste Consignment note as part of waste acceptance procedures (see full index of Environmental Protection Procedures or EPPs in Appendix 1).

For incoming loads of cable classified as non-hazardous plastic (non-mixed), representative samples will be checked / analysed using a pre- calibrated XRF gun to check whether there are POPs present in the cable. If the XRF analysis detects the presence of POPs, the cable will be quarantined, the customer informed and a sample taken and sent to an approved UKAS accredited laboratory to be analysed for the full suite of likely POPs contaminants present in the cable. If POPs are shown to be present, then the cable will be transferred to the hazardous cable bay for treatment and batch processing in the granulator as required. An incident Event log will then be raised on the TCM (Total Compliance Management) SHE software system.

The XRF gun works by quantitative Br (brominated compounds) detection using a hand-held XRF (X-Ray Fluorescence) spectrometer, calibrated in ‘plastics’ mode. These hand-held XRF devices are available from a range of suppliers (e.g. Niton, Thermo-Scientific, Hitachi). The XRF analysis will instantly determine the percentage of bromine within the material using 15 second scans. Multiple scans would be completed over the load to determine if the bromine content is within acceptable tolerance limits to identify non-hazardous cables, followed by segregation on site or rejection of the load(s) as required.

Operatives who use the scan will have to have completed radiation training and a qualified RPS will be required to monitor the work.

POPs Cable Tonnage Limits

Annual throughput:

Waste Cable Type	**Maximum throughput tonnes per annum**
Non-hazardous cable	20,000
Hazardous Cable	10,000

Storage limits:

Waste Cable Type	Storage Limits (any one time)
Non-hazardous cable	300
Hazardous Cable	300

No waste cable will be stored on site at Edmonton for more than 3 months.

4.4.5 Wastes Containing Liquids

The site will not accept tanks or drums unless they have been confirmed as having been purged of their contents through provision of a purge certificate or via suitable inspection points being provided.

Liquids and other hazardous components will be drained or removed from End of Life Vehicles (ELVs) in accordance with the End of life Vehicle regulations as detailed in the relevant section. All storage and treatment of ELVs will take place on an impermeable surface served by a sealed drainage system; depolluted ELV's may be stored on hard standing.

4.4.6 Pressurised Containers

Gas cylinders and pressurised containers are not knowingly accepted at the site. Should such items be discovered during the inspection stages, they will be rejected from site. Should these be discovered later among material waiting processing, or export then they will be segregated and placed in a designated appropriately signed container/compound prior to collection or decommission by an appropriately authorised contractor.

Records of the collection of gas cylinders shall be retained in the site diary or the sites environmental files and recorded on a TCM Event log.

4.5 Waste sampling and testing

The sites waste acceptance criteria do not routinely require wastes accepted to be subject to sampling or testing. If the site does accept any materials that may be classified as hazardous, then the site will require that appropriate documentation detailing the relevant hazardous properties and safe storage and handling requirements is provided.

4.6 Waste quantity measurement systems

Records will be maintained for all wastes accepted to the site and exported from the site. Waste quantities will normally be recorded via the sites weighbridge or other mechanical scales in smaller acceptance areas such as the non-ferrous trading area. However in instances when the weighbridges may not be functioning due to events such as power cuts, weight estimations may also be provided based on the calculation of tonnage verses volume for loads that cannot be weighed. The site may also rely on volume measurement information for items such as liquids removed from site by contractors when bunds, tanks and interceptors are serviced / cleaned.

The sites weighbridges are calibrated on a minimum annual basis under service contract and more regularly if required when maintenance is undertaken. The validity of these calibrations will be confirmed on a minimum annual basis by the weights and measures section of the Trading Standards Agency, this can again be undertaken more regularly if required.

Records of all calibration and Trading Standards inspections will be retained on site, service labels will also be maintained on the equipment for quick visual inspection and confirmation of calibration.

4.7 General Storage of wastes

Wastes with particular hazardous properties may require special storage and tracking controls over and above those specified in sections 1.1, 2.1 and 4.4, in order to prevent and control risks to the environment from the storage of these wastes.

The site maintains special storage procedures for End of Life Vehicles prior to depollution, Lead Acid Batteries, tyres and metals that may generate contaminating liquids.

4.8 Specified Waste Treatment Process – Plant, Equipment and Procedures

4.8.1 Storage and Depollution of End of Life Vehicles

[Note: An ELV depollution rig is at the time of writing being constructed on site and as yet to be fully installed at the Edmonton site and consequently no ELV depollution is currently being performed].

The main specified treatment process undertaken on site is the storage and depollution of End of Life Vehicles (ELVs). This is undertaken in line with the End of Life Vehicles directive brought into force in November 2003. Liquids and other hazardous components will be drained or removed from End of Life Vehicles (ELVs) in accordance with the End of life Vehicle regulations (as detailed) before they can be further processed by baling, shearing and eventually turned back into recyclable metals. All

storage and depollution will take place on an impermeable surface served by a sealed drainage system.

The End-of-Life Vehicle Regulations 2003, Statutory Instrument No. 2635 regulates the acceptance, storage and depollution of end of life vehicles.

Storage Areas and infrastructure

Storage and treatment areas will be engineered with appropriate, impervious surfaces and provided with appropriate equipment for the treatment of water (including rainwater) through diversion via a full retention interceptor to the appropriately permitted final discharge point.

The treatment of waste motor vehicles shall only be carried out in area of the site which has the following (see attached site H&S plan for location of ELV treatment area):

- Areas engineered with impervious surfaces to protect the underlying ground and groundwater and provided with spillage collection facilities.

- Areas provided with storage facilities that are appropriate for dismantled spare parts, including impervious storage facilities for spare parts that are contaminated with oil.

- Areas provided with containers that are appropriate for the storage of materials removed from vehicles where separation is required, i.e. batteries;

- Areas provided with suitable storage tanks used for the appropriate storage of any fluid from a waste motor vehicle;

- Areas for the storage of used tyres without excessive stockpiling, and minimising any risk of fire.

The treatment / depollution of waste motor vehicles will consist of following when applicable:

- the removal of the battery or batteries;

- the removal of the liquefied petroleum gas tank (if applicable);

- the removal or neutralisation of all potentially explosive components (including air bags and seat belt tensioners) through deployment;

- the removal, collection and storage of operating fluids and which will include:

  - Petrol or Diesel
  - Engine Oil
  - Brake fluid
  - Windscreen wash water / antifreeze mix (ethylene glycol)
  - Shock absorber oil
  - Air conditioning gases (where applicable)

- the removal of any components identified as containing mercury or asbestos
- Lead weights
- Tyres
- Catalysts

and where any such article or material is removed it shall be done in such a way as best promotes its recycling.

4.8.2 Acceptance and Storage of Lead Acid Batteries

Lead acid batteries will be accepted at site from a range of sources they will also be produced on site through the treatment of end of life vehicles. When lead acid batteries are received or generated on site and are subsequently stored prior to transfer to a suitably permitted treatment facility the following steps will be followed:

Acceptance

EMR will only accept waste on site in accordance with its waste acceptance procedures. The site will maintain waste transfer records as specified in section 7 of the working plan. Lead acid batteries are classified as hazardous waste; therefore they must be accepted and dispatched from site in accordance with the Hazardous Waste Regulations 2005.

Storage

1. All batteries will be stored in a storage area with an impervious floor and covered roof.

2. Neutralising materials, liquids or granules will be maintained on site for use in there event of a battery acid spill. Staff will be trained on site in spillage management procedures.

3. If an acid spill should occur, it will be cleaned up immediately.

4. All batteries must be stored upright in acid resistant plastic battery bins. Where practical these should be covered prior to transfer to the battery storage area to prevent the ingress of water.

5. All designated battery storage areas/battery storage bins will be clearly labelled

Dispatch

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6. Lead acid batteries are classified as hazardous waste; therefore they must be accepted and dispatched from site in accordance with the Hazardous Waste Regulations 2005.

7. Hauliers and disposers of lead acid batteries must be approved suitably permitted contractors and the receiving facility must also be suitably permitted to accept lead acid batteries. Where authorised contractors are used to remove lead acid batteries copies of transfer notes will be retained in accordance with the site's working plan.

4.8.3 Acceptance and Storage of Tyres

Tyres will be accepted at site as part of end of life vehicles however they may also be received from other sources in accordance with waste acceptance and control procedures. When tyres are received or generated on site and are subsequently stored prior to transfer to a suitably permitted treatment facility the following steps must be taken:

Acceptance

EMR will maintain site acceptance records of all materials accepted at site in accordance with section 7 of the working plan.

Storage

Tyres will be stored in stable stacked stock piles or within appropriate containers on site. Where necessary tyres may be processed to obtain increased storage capacity, this will be achieved by one or more of the following processes: removal of inner wheel rims, cutting / size reduction or compaction.

Each storage stock pile will be a maximum of 50 cubic metres in volume and shall be separated by a distance of at least 6 metres from each other.

Dispatch

Haulers and disposers of waste tyres must be approved suitably permitted contractors and the receiving facility must also be suitably permitted to accept tyres. Where authorised contractors are used to remove tyres from site, copies of transfer notes will be retained as detailed in as detailed in section 7 of the site's EMP.

4.8.4 Metal Shearing and Baling

Only material permitted in the Environmental Permit is allowed to be processed by the shear. Failure to do so will result in a breach of permit conditions and possible enforcement action.

Safe Working Procedures have been developed for each individual process involved in the shear operation. These procedures must be followed at all times when operating the shear.

Inspection of the shear shall form part of the regular SHE (safety, health and environment) inspection regime. If there are any defects of the shear or it is not operational or not performing correctly and especially if the defect may potentially cause environmental harm or pose a health and safety risk, then the shear must be shut down and reported to the site manager immediately.

Any oil (hydraulic or lubricating oil) leaks or spills emanating from the shear must be reported immediately and the appropriate spill response procedure initiated (or accident and emergency plan if there is a major spill).

A regular maintenance schedule shall be implemented for the shear.
Only authorised trained personnel shall operate and perform repairs to or maintenance of the shear and safe working procedures (SWPs) to be followed at all times.

4.8.5 Granulator Operations (Non-ferrous Plastic Insulated Metal cables)

EMR Edmonton operates a MTB Maxi Granulator SRP 2400-1600 which is fully enclosed within the Granulator building. The Granulator has the following specification:

- Infeed (non-ferrous) material size: <400mm
- Average feed density: 0.15 – 0.5 tonnes/m3
- Output material size: <30mm (generally)

Only materials permitted by the site Environmental Permit will be processed by the granulator. The process in outline is as follows:

1. Using a crane, the material is placed onto the feed conveyor belt which conveys the material into the 'pre- granulator ('2400).

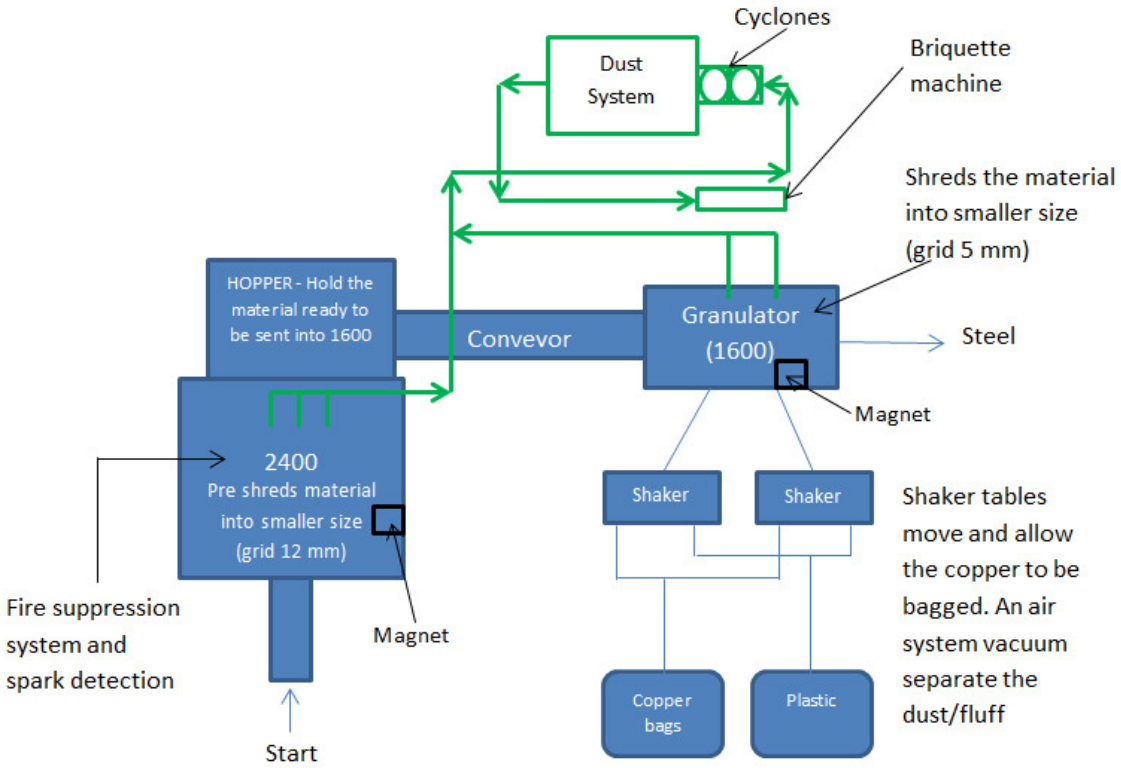
2. The pre-shredder reduces the material size to about 12 mm. A spark detector and a fire suppression system is located in this part of the machine.

3. The material is held in the 'hopper' and an operator feeds selective amounts of the material into the next granulator chamber ('1600') to avoid overloading.

4. A conveyor belt feeds the material from the hopper into shredder '1600', which reduces the material size to about 5 mm. Inside the '1600' a ferrous magnet separates the steel from the copper.

5. Finally the copper is conveyed onto shaker tables (via two screws), equipped with an air vacuum system to remove any dust/fluff from the copper. A screw feeds the copper (product) directly into large 1 tonne bags, ready to be stored and transferred for export from the site.

Granulator Process Schematic:



Granulator Operation

Both hazardous and non-hazardous copper cable are loaded onto a conveyor belt (separately in different batches) by a material handler to feed a Pre-Granulator for initial cutting of the infeed material. The feeding of the plant by a material handler allows optimum regulation and equalisation of the wire infeed to achieve higher energy and resource efficiency (in accordance with BAT).

The Pre-Granulator operates rotor knives at high speed to cut the Copper cable into a smaller size in preparation for more efficient cutting within the main Granulator. The Pre-Granulator is fitted with an underlying grid with 12mm holes (to capture any small Copper granules) and magnet to remove any ferrous contamination. There are grids with different sized apertures depending on the type of Copper cable being processed to maximise Copper yield.

The material is then fed into a Hopper in preparation for funnelling into the Granulator via a covered conveyor belt. The Granulator operates blades at high speed using rotor knives to further cut the Copper wire into granules. The Granulator is fitted with an underlying grid with 5mm holes (to capture any small Copper granules) and a magnet to remove any further ferrous contamination. Again, the former is replaced with grids with alternative hole sizes depending on the type of Copper wire being processed to maximise Copper yield. Following cutting / granulation, the Copper granules are passed over shaker tables to remove any remaining contamination as well as to separate the Copper and plastic materials for bagging. The Copper and plastic are stored in separate bags and not mixed following treatment in the Granulator.

The Pre-Granulator and Granulator have a combined extraction system operated under negative pressure to prevent dust and particulate emissions to air. The Pre-Granulator has 3 outlets and the Granulator has 2 outlets which extract dust and particulates from the plant. The extracted dust and particulates are funnelled into 2 cyclones to remove heavier fractions followed by a bag filter (note there is no exhaust from air plant i.e. no point source emissions). All matter is then funnelled into a compacting machine which compacts the dust and particulates into briquettes for effective disposal at a suitably permitted and approved facility. All dust and particulate briquettes are stored within the Granulator building to minimise impact on receptors (there is no emission point from either cyclone, bag filter or wider extraction system), with any dust and particulates generated used to create briquettes (as shown in schematic above). As such, there are no dust or particulate emissions to the atmosphere associated with copper cable.

POPs Cable Storage and Processing in Granulator

Segregated Hazardous and Non-hazardous POPs cable will be stored in separate bays within the main Granulator Warehouse as shown in the EMR Edmonton Site Plan (May 21) prior to processing cable through the granulator. The hazardous (POPs containing) cables and non-hazardous cables will be batch processed separately through the granulator as outlined above. The XRF gun (as described in section x) will used to check non-hazardous cable for the presence of POPs as required.

Hazardous and non-hazardous cable will be processed in the granulator in separate batches (batch runs lasting up to a day). Following a batch shift the granulator will be allowed to continue to run for a period of time to allow for the discharge and removal of any remaining product and waste by-product (including plastic wastes) before changing to either a non-hazardous or hazardous cable batch shift, to prevent cross contamination.

As the two types of cable are processed in the granulator via a batch process the waste plastic material (derived from the granulation process) will be fed into one of two separate rollonoff bins dependant on the scheduled type of cable being processed at the time. For example when hazardous POPs containing cable is being processed, the waste plastic by-product (containing POPs will be fed into the appropriate, designated rollonoff bin (labelled hazardous POPs plastic) as shown on Site Plan (Appendix 3).

An XRF gun will be used on the non-hazardous plastic waste periodically to ensure there is no contamination by hazardous (POPs bearing) plastics.

4.8.6 WEEE (Waste electrical and electronic equipment) Waste

Waste electrical and electronic equipment (WEEE) can be split up into 5 different groups

Group A – large domestic appliances (LDA) (washing machines, tumble driers, dishwashers etc) excluding fridges and freezers (fridges and freezers are not permitted into the site).
Group B – fridges and freezers
Group C – Cathode Ray Tubes (TVs and monitors)
Group D – fluorescent tubes
Group E – small mixed WEEE (SMW) consisting of everything else (lawnmowers, hoovers, PCs, small household appliances, tools etc.)- group E wastes are classified as hazardous wastes and must be accompanied as by a hazardous waste consignment note.

- Only **Group A** (large domestic appliances or LDA) loads **can be accepted** into the site (consisting of partially or entirely of Group A waste can be accepted at the Edmonton site)
- Group B waste shall be redirected to designated fridge processing plants and rejected from site
- Groups C and D shall be rejected at the weighbridge. Although it is accepted that small amounts of these (not whole) may be present in ordinary loads.
- Any loads which the WBO is unsure of will be moved off the weighbridge to be inspected by the Depot Manager.
- Any tumble dryers that are accepted on to site which are identified as containing F gases or condenser fluids will be immediately quarantined and contained in a sealed skip to prevent any contaminant runoff entering the drainage system, and quickly disposed of to another permitted site.

Group C, D, E (small mixed WEEE wastes) if quarantined as rogue items must be consigned as hazardous wastes when disposed of at an approved and permitted waste facility.

Items that fall into Group A

1. Loads will be inspected to ensure that the load consists only of items that fall under the group A category
2. Loads will be graded and accepted as a light iron grade as appropriate.

I**tems that fall into Group B**

Inspect the load to ensure that there are no Group B items, the site is not a fridge processing plant or a designated 'feeder site' therefore the load shall be redirected to one of these sites.

Items that fall into Group C, D and E

1. The load will be inspected to ensure that there are no items in the load consisting of Group C, D, E.
2. The site is not permitted to accept these groups of WEEE and entire loads of these materials will be rejected at the weighbridge

Section 5 Pollution control, monitoring and reporting

5.1 Monitoring and reporting for gases, vapours and aerosols

The typical operation and handling of waste material and processed metals on the site is not considered to give rise to emissions of specific gases, vapours or aerosols at such levels or concentrations that there is a measurable risk of pollution of the environment or human health outside of the site boundary.

However if a potential environmental issue is identified linked to emissions of specific gases, vapours or aerosols at such levels or concentrations that could pose a risk of pollution of the environment or human health outside of the site boundary then appropriate steps will be taken by EMR to monitor these emissions.

5.2 Groundwater monitoring and reporting systems

The typical operation and handling of waste material and processed metals on the site is not considered to pose a significant risk or direct linkage to ground waters due to the engineering and operational containment systems that have been put in place on site.

However if a potential environmental issue is identified that may potentially effect the underlying groundwater then appropriate steps may be taken by EMR to monitor ground water under the site were possible.

5.3 Surface water monitoring and reporting

The typical operation and handling of waste material and processed metals on the site is not considered to pose a significant risk to surface waters due to the nature of the materials handled on site and the engineering and operational containment systems in place on site.

However if a potential environmental issue is identified, that may potentially effect the surrounding surface waters then appropriate steps may be taken by EMR to monitor at a number of appropriate points around the site.

The site may be required by other regulatory consents to undertake monitoring of discharges to consented discharge points.

Bi-annual sampling of the surface water runoff at the outfall will be conducted by a competent person and sent to a UKAS accredited laboratory for analysis against relevant parameters (including pH, BOD, COD, Oil, Suspended Solids, Metals - e.g. Cu, Zn, Pb, Cd)

5.4 Monitoring of Meteorological Conditions

The site can maintain constant monitoring of meteorological conditions through a number of methods.

Primarily weather conditions will be monitored based on visual observation and monitoring of weather reports which can be obtained from a number of sources and will be relied upon to give an indication of pending storm events that may effect the sites operation. If necessary the site will also maintain basic weather monitoring and recording equipment to maintain an ongoing record of events.

Records will be maintained in the site diary of any meteorological conditions that adversely effect the sites operation. Weather conditions (temperature, wind speed & direction) will be reported daily in the site diary / log.

5.5 Site Diary / log

A site diary / log will be maintained at the site and used to record daily events and any incidents, complaints or environmental occurrences. This will include:

- Machine breakdowns, plant repairs etc.
- Construction work
- Excessive dust or noise detected at site boundaries
- Daily Met office weather details recorded on site diary / log (e.g. wind speed / direction)
- Damage to fencing, plant, hydraulics etc.
- Emergencies (including fire and flooding)
- Daily fire watches completed
- Problems with waste received and action taken (e.g. asbestos in load)
- Results pest control inspections and measures taken
- Complaints received and action taken
- Non compliant wastes (as specified in the Environmental Permit)
- Any major spillages
- Flooding / ponding
- Date of interceptor clearance
- Radiation detected on loads
- Environmental issues and action taken
- Technically competent management attendance on site: date and time onto and off site.
- Inspections by the Environment Agency / other regulators

5.6 Fire Prevention Plan (FPP)

A Fire Prevention Plan (FPP) will be written and implemented for the site (on agreement with the Environment Agency) and will contain a description of the appropriate measures to prevent fires on site and minimize the risk of any pollution from fires.

A Fire Prevention Plan (FPP) for Edmonton has been completed and was submitted to the Environment Agency in November 2019. The FPP is being implemented across the site and forms part of the site's management plan.

Section 6 Amenity management and monitoring

6.1 Control, monitoring & reporting of dusts, fibres and particulates

Regular inspections will be undertaken throughout the working day by the site management and any potential dust problems identified. Potential problems may include unfavourable weather, such as windy, dry or sunny conditions and direction of prevailing winds which may result dust generation. Weather details, including wind speed and direction must be taken from the Met office website (for Edmonton) and recorded on site diary / log at the beginning of each day. If dust is assessed to be an issue the site manager will monitor the situation closely and take appropriate mitigating actions including use of suppression spays and management of processing operations.

Dust monitoring is conducted on a continuous basis with a fixed, quantitative air quality monitor, measuring PM10 and total particulate, stationed next to the weighbridge (see also site Dust Emissions Management Plan). Dust monitoring will also be undertaken on a qualitative, visual basis as part of the site manager's daily site inspection. Any complaints from neighbours will be investigated. Where appropriate more quantitative methods of dust monitoring will be used if a problem is perceived to be continuing or in the case where the cause of dust needs to be established such as dusts being generated by off site sources or other abnormal occurrences.

In the event that complaints are received relating to dust on site, details of the probable and potential causes, investigative measures taken and any results will be recorded on an Event log and the site diary / log depending on the seriousness of the compliant and the results of any associated investigations. (EPP4.4)
[See also Edmonton Dust Emissions Management Plan or DEMP]

6.6.1 Dust Emissions Management Plan (DEMP)

A site Dust Emissions Management Plan (DEMP) has been produced for the EMR Edmonton site as it is recognised that the Edmonton site's operations can generate dust, when combined with local emissions from nearby busy roads and railways and other neighbouring industrial facilities the site has a potential to impact on the environment, and local amenity.

This Dust and Emissions Management Plan (DEMP) is intended to produce a reproducible and consistent approach to dust management at the facility, with the aim of continually reducing the levels of fugitive and point source emissions and dusts generated by the site's activities. The DEMP describes the management initiatives that EMR have and will implement to manage, reduce and mitigate against the generation of dust (and other emissions) from the EMR Edmonton facility.

Specifically the DEMP addresses the following:

- The process for the DEMP development and production
- Site based risk assessment
- The UK framework and dust/air quality targets and quality guidelines
- Measures, mitigation methods and practices (e.g. water based dust suppression measures) to minimise and reduce the generation of emissions and dust.

6.2 Control of odours

The types of materials that will be received and processed at the site are not likely to result in the significant generation of odours due to the nature of the waste material accepted on to site (little or no biological contamination). In the event that complaints are received relating to odours on site, the potential cause shall be investigated with details and the results of any investigations recorded TCM Event Log and the site diary /log. Any waste materials containing non-permitted waste such as putrescible wastes (e.g. scrap metal load contaminated with kitchen waste) will be rejected at the gate, recorded in the site diary log and a TCM Event log raised.

6.3 Control and monitoring of environmental noise

Acoustic barriers / walls, as stipulated by KCC Planning Permission requirements for the Edmonton site will be installed at the front of the site and around the perimeter of the site. In order to minimise noise generated from plant, equipment will be inspected on a daily basis and maintained in accordance with manufacturer's specifications.

The company will take appropriate steps at all stages of waste handling from acceptance, to processing to final export to minimise the risk of noise generating events such as explosions through its acceptance criteria procedures. This will be achieved through the inspection of materials for items such as gas cylinders and through ensuring that items such as ELVs are properly depolluted therefore where possible removing risks from explosive vapours.

Operating and waste acceptance hours are restricted in accordance with section 1.3 of the EMP which will also restrict the times at which noise will be generated on site.

Any noise complaints received will be recorded and investigated, with results being retained in the companies' central environmental files or the sites Environmental Files and / or the site diary (EPP4.3, 4.6).

6.4 Control of pest infestations

In the event that pests or vermin are discovered on site that are assessed to be posing a threat to the environment, safety or amenity then a specialist pest control contractor

shall be appointed as soon as possible. The attendance of the contractor will be recorded in the site diary (EPP4.1).

6.5 Control of litter

The boundaries of the site will be inspected on a daily basis and any litter present will be collected by the end of the working day. Incoming loads will be inspected (as part of waste acceptance procedures) to ensure that no loads containing rubbish or litter are accepted on to the site (EPP4.2).

6.6 General Amenity and Removal of Residues

The site is situated within an industrial estate, adjacent to a railway line (Abelio Anglia/ Network Rail) running along the eastern boundary of the site and the North Circular Road runs east- west directly to the south of the site. The nearest residential housing is Montague Road, located 0.25km to the North-West of the site. Scrap metal and associated wastes will be stored to reasonable heights so as not to cause an adverse affect on the local visual amenity.

Waste (or 'dirt') generated from waste processing destined for landfill will be segregated and stored in a designated area. For any waste destined for landfill, only approved waste contractors will be used and the appropriate duty of care documentation completed, on transfer of the waste to a permitted facility (EPP2.9).

Section 7 - Site records

7.1 Security and availability of records

EMR will maintain site records at the locations specified in section 7.2, Table 4. These locations shall be deemed to meet the agencies requirements in that they will be within easy daily/routine access of the Agency Area office for the site.

The site offices and document storage facilities will be maintained in such a manor as to provide a location that will keep documents secure from loss, damage or deterioration for the statutory periods that they must be retained.

7.2 Records of waste movements

Site records of waste movements shall be maintained through the retention of hard copies of normal weighbridge tickets, hazardous waste consignment notes and transfer notes from servicing contractors removing contaminated liquids, absorbents, waste oils etc. This information will be retained in at the following locations for the following specified time periods:

Table 4 Retention and availability of records

Records	Location	Retention Time Period
Weighbridge tickets	On site	3 years
Incoming hazardous waste consignment notes	On site	6 years
Out going consignment notes and transfer notes from servicing contractors removing contaminated liquids, absorbents and waste oils	On site	6 years
Electronic Records	Head Office (Warrington) Server – with national access for any authorised site and user.	Electronic records commenced in 1999 long term retention time scales are yet to be established (anticipated to be a minimum of 10 years).

This information will be further maintained in an electronic format by the companies' weighbridge and accounting data base, from which waste movement information can be obtained in a number of reporting formats.

7.3 TCM Event Log (and site Diary /log)

Environmental incidents, occurrences, breaches of permit etc. shall be recorded on the electronic SHE TCM Event Log with any actions generated completed by the deadline date. If the date is passed and the action not completed then this will go red and appear on the weekly report to senior management.

The site diary / log will also maintained (see 5.5 above for details) in the site weighbridge office and shall be maintained by the site manager or those operatives which the manager delegates its maintenance to. Other similar documents and information recording systems may also be maintained.

7.4 Periodic Reporting of Environmental Performance

The site will make quarterly tonnage returns to the Environment Agency detailing its inwards and outwards waste movements by EWC code in an electronic format.

EMR will centrally manage the reporting of hazardous waste returns quarterly to the Environment Agency via its Hazardous Waste Team, the current electronic reporting address for this information is hazwastereturn@environment-agency.gov. Hard copies of the quarterly hazardous waste returns will also be retained in either the companies' central environmental files and / or the sites environmental files.

7.5 Additional Records, Safe Working Procedures, Risk Assessments and Emergency Procedures

In addition to the statements and procedures detailed with this EMP the site may also implement and retain additional safe working procedures, risk assessments and emergency plans within their Environmental (Green Files) and Health and Safety files which are updated on a reactive basis linked to relevant operating issues. These procedures will be made available for confidential viewing to regulators upon request and form an important and relevant part of the sites operational procedures and practices in addition to this EMP.

Section 8 Environmental Management System

In order to reduce the site's environmental impact, an Environmental Management System (EMS) will be implemented to provide the company with a framework through which its environmental performance can be monitored, improved and controlled. The EMS is supported (and also recorded on) an electronic software SHE managements system called Total Compliance Management (TCM system).

The EMS for the site will comprise of an environmental policy, the environmental management plan (formerly working plan) for the site, planned environmental risk assessments, environmental procedures (EPPs), environmental auditing, planning and review, emergency plan, environmental training and environmental reporting (SHE Action Log and Event Logs). The EMS also forms part of an electronic IMS (Integrated Management System) operated as Trade 2 TCM and IMS.

8.1 Environmental Policy

The company's environmental policy (group wide) will be implemented on site outlining the company's mission and driving force behind the environmental objectives, targets and management programme of EMR.

The policy stating the company's aims and objectives will form the basis for its EMS on site and will be endorsed and actively supported by senior management and accepted by all staff.

It will allow management to communicate its aims and objectives to employees and other interested parties, including shareholders, customers and suppliers and be part of the business strategy.

8.2 Environmental Risk Assessments and Procedures

Planned environmental risk assessments will be conducted at the site to identify significant environmental impacts and risks and these will be translated into procedures as appropriate; environmental protection procedures (EPPS) will be written and appropriate training given to staff in the implementation of these procedures.

The core EPPs implemented on site (applicable to most of EMRs metal recycling and ELV depollution sites are listed in Appendix.

These EPPs will be controlled and supplemented with generation of further EPPs (site specific or otherwise) to be implemented and controlled as part of the environmental management system plan or as and when required.

8.3 Environmental management training

Environmental training will be provided to all staff as appropriate. The depot manager and key staff will be given formal training on environmental protection procedures (EPPs) and the requirements of the Environmental Permit as appropriate. Other staff will be trained via 'tool box' talks etc. or specific EPPs as appropriate to task.

The depot manager will be technically competent or will undergo the requisite CoTC training or WAMITAB / NVQ training (or equivalent) or be scheduled to attend the relevant course.

8.4 Environmental Auditing

The site will undergo a full Environmental Audit at least once per year, led by the Regional Environmental Manager, recorded and reported and actions generated on to the Teamworks electronic SHE management system. This may be occasionally supplemented by an audit conducted by the EMR group auditing team.

References:

Environment Agency – Environment Agency guidance: 'How to comply with your environmental permit' (formerly Working Plan Guidance)

Environment Agency - Technical Guidance WM3, Interpretation of the definition and classification of hazardous waste.

Appendix 1 – Environmental Protection Procedures (EPPs)

Reference	Title
Waste Acceptance	
EPP 1.1	The Duty of Care - Acceptance of incoming material
EPP 1.2	Inspection of Incoming Materials
EPP 1.3	Identification of Hazardous Waste
EPP 1.4	Completion of hazardous waste consignment notes
EPP 1.4a	Completion of special waste consignment notes (Scotland)
EPP 1.5	ELV Acceptance
EPP 1.6	Identification of Radioactive Items
EPP 1.7	Identification of Potential Explosive Items
EPP 1.8	Rejection of Material
EPP 1.9	WEEE & Refrigerator Acceptance
EPP 1.10	Duty of Care - Waste Removals
EPP 1.11	Battery Acceptance
EPP 1.12	Steel Can Waste Acceptance
EPP 1.13	Catalytic Converters
EPP 1.14	Inspection of Baled Materials
EPP 1.15	Radioactive Item Disposal
EPP-1.16	Duty of Care – Disposal of Soil & Dirt
Storage of Potentially Polluting Materials	
EPP 2.1	Storage of ELV
EPP 2.2	Storage of Oils & Fuels
EPP 2.3	Storage of Batteries
EPP 2.4	Storage of Engines
EPP 2.5	Storage of Turnings
EPP 2.6	Storage of Gas Cylinders
EPP 2.7	Storage of Scrap Metal
EPP 2.8	Storage of Fragmentiser Waste
EPP 2.9	Storage of Waste Tyres
EPP 2.10	Storage of WEEE

Reference	Title
EPP 2.11	Storage of Putrescible Waste
EPP 2.12	Storage of Radioactive Items
Infrastructure Requirements & Maintenance	
EPP 3.1	Interceptor Inspection and Maintenance
EPP 3.2	Bund Inspection and Maintenance
EPP 3.3	Sump Inspection and Maintenance
EPP 3.4	Taking Water Samples
EPP 3.5	Management & Control of drainage & surface water discharge
EPP 3.6	Water Discharge Failure of Effluent Treatment Plant (YBNF)
EPP 3.6-01	Daily Waste Water Testing Schedule (YBNF)
EPP 3.7	Infrastructure – Taking Soil Samples
EPP 3.8	Infrastructure - Granulator Inspection and Maintenance (Edmonton)
Nuisance	
EPP 4.1	Pest Control
EPP 4.2	Litter Control
EPP 4.3	Noise Control
EPP 4.3b	Noise Control (Bedford)
EPP 4.4	Mud and Dust Control
EPP 4.5	Odour Control
EPP 4.6	Vibrations
EPP 4.7	Explosions
EPP 4.8	Fly control
EPP 4.9	Light Pollution
EPP 4.10	Management and Control of Invasive Species
EPP 4.11	General Housekeeping
Environmental Occurrences	
EPP 5.1	Fire Prevention & Response
EPP 5.2	Spill Response
EPP 5.3	Hazardous Substance Deliveries
EPP 5.4	Fuel Tank Checks (YOLD)

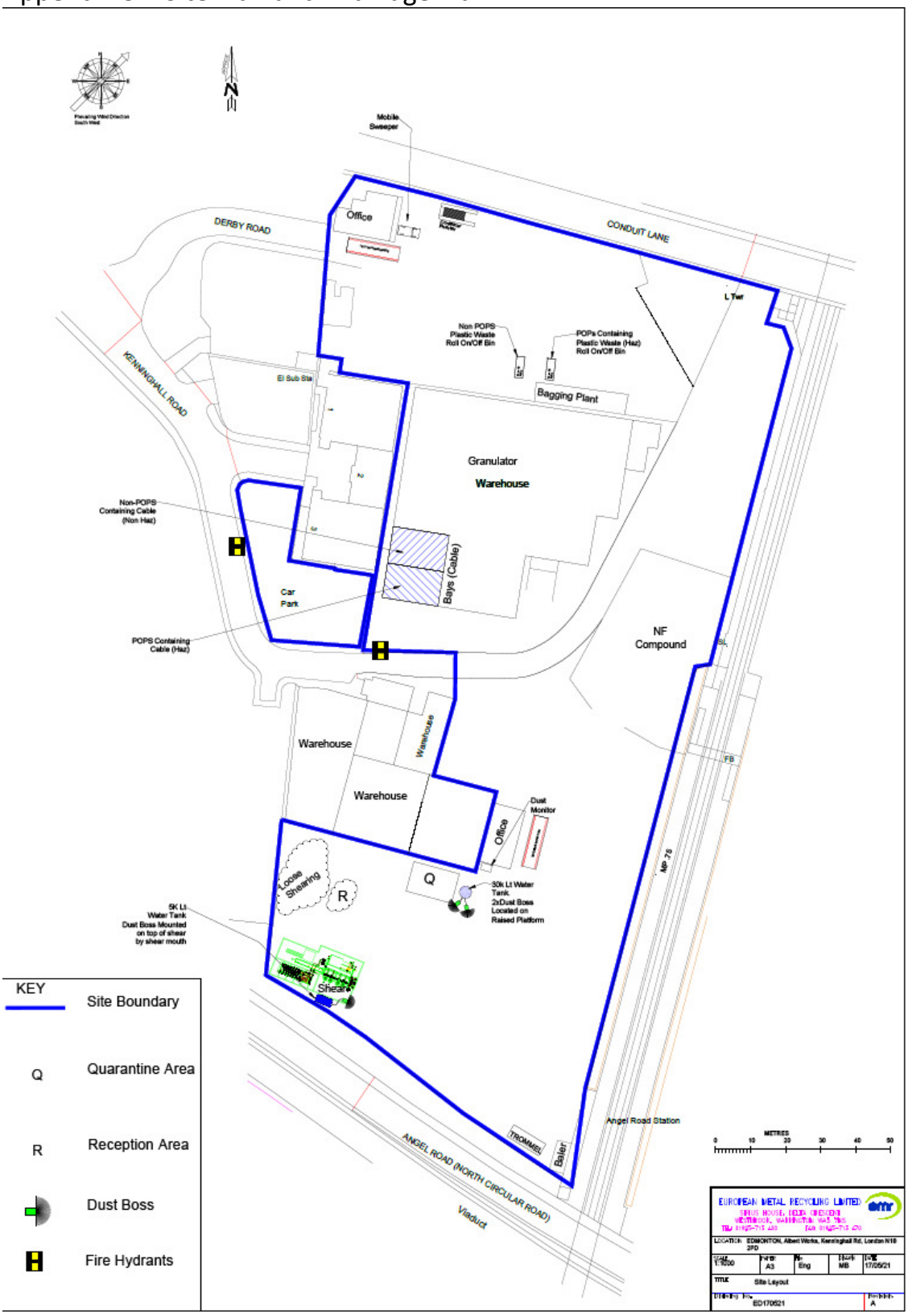
Reference	Title
Operations	
EPP 6.1	ELV Depollution
EPP 6.2	Fragmentiser Operation
EPP 6.3	Production Burning
EPP 6.4	Shear and Baler Operation
EPP 6.5	Weighbridge
EPP 6.6	Contractors
EPP 6.7	Trommel Operation
EPP 6.8	Ship loading and Despatch
EPP 6.9	Plastics processing and storage
EPP 6.10	Train Loading and Dispatch
EPP 6.11	Drivers
EPP 6.12	Mobile Baler
EPP 6.13	Factory Contract
Other	
EPP 7.1	Environmental Permit
EPP 7.2	Exporting of Material
EPP 7.3	Office Activities (YCEN)
EPP 7.4	Energy and Resource Efficiency Monitoring (YOLD)
Fridge Plant	
EPP 8.1	Refrigeration Unit Unloading (DARFDG)
EPP 8.1	Fridge Unit Acceptance and Unloading (WILFRG)
EPP 8.2	Refrigeration Unit Treatment (DARFDG)
EPP 8.2	Refrigeration Unit Treatment (WILFRG)
EPP 8.3	Fridge Plant Storage (DARFDG)
EPP 8.3	Fridge Plant Storage(WILFRG)
EPP 8.4	Fridge Compressor Checks (DARFDG)
EPP 8.5	Fridge Plant Monitoring (DARFDG)
EPP 8.5	Fridge Plant Monitoring (WILFRG)

Appendix 2 – Site diary /log

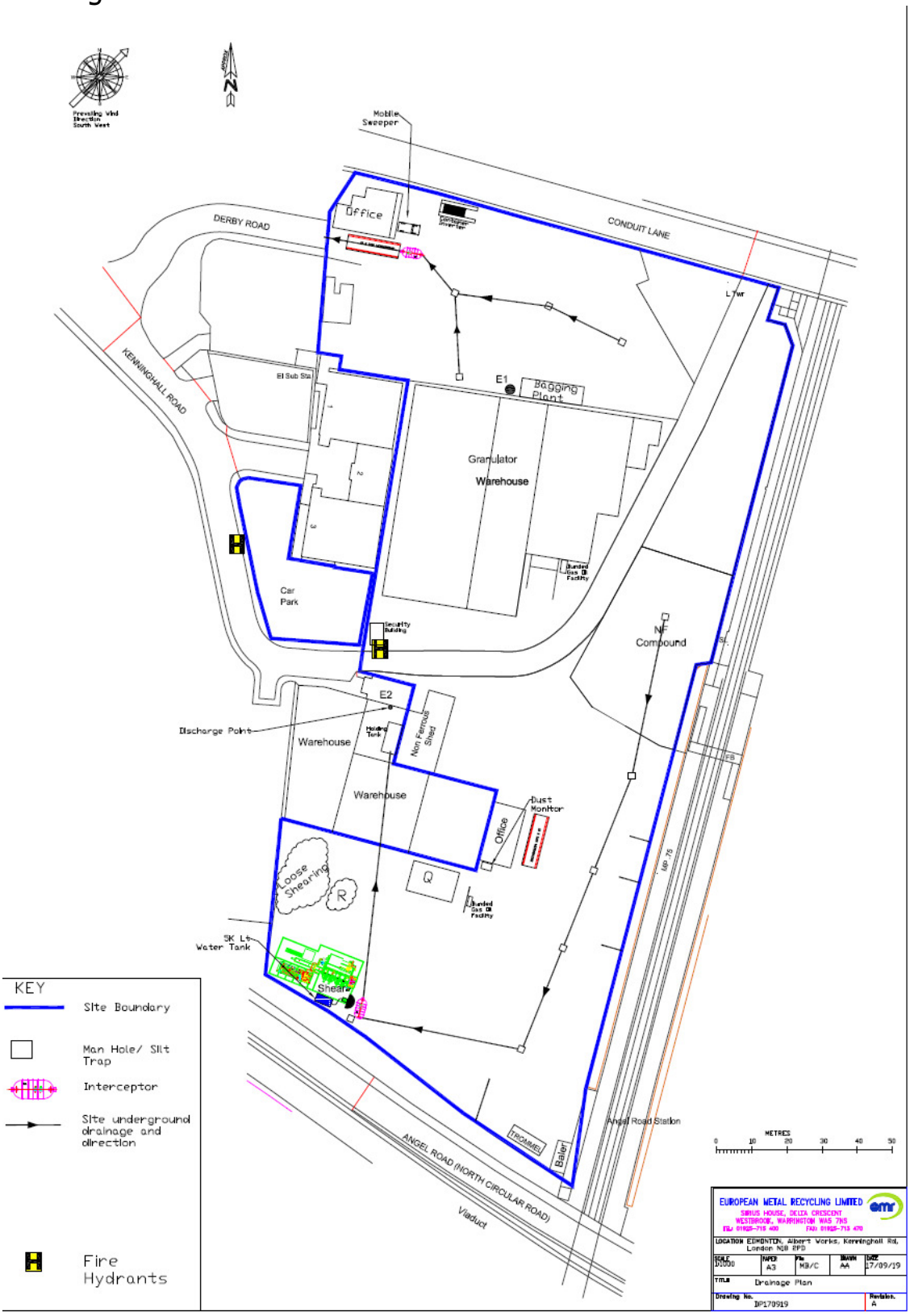
Site Location/Name:	**EMR Edmonton**	**Date of report:**	
Technically Competent Manager Name:			
Time In:		**Time Out:**	

	Check Items	Circle as applicable			Comments/Issues		
1	Any non-permitted waste?	Y	N	n/a	*Describe:*		
2	Is dust / mud leaving site?	Y	N	n/a	*Describe:*		
3	Is there excessive noise/vibration/odour?	Y	N	n/a	*Describe:*		
4	Hazardous POPs cable tested (XRF) & segregated?	Y	N	n/a	*Describe:*		
5	Are security measures fully operational? (gates, fences/walls, locks, CCTV etc.)	Y	N	n/a			
6	Is pest control in place?	Y	N	n/a			
7	Any smoke/dust generated on site?	Y	N	n/a	*Describe:*		
8	Are radiation detectors functioning?	Y	N	n/a			
9	Any significant maintenance/construction work in progress?	Y	N	n/a	*Describe:*		
10	H&S and Env. signage in place?	Y	N	n/a			
11	Traffic routes clear of debris?	Y	N	n/a			
12	Process plant operating?	Y	N	n/a	**Machine Name**	**Start**	**Finish**
		Y	N	n/a			
		Y	N	n/a			
13	All emergency exits clear?	Y	N	n/a			
14	Dust curtain/netting intact?	Y	N	n/a			
15	Any plant/equipment breakdown?	Y	N	n/a	*Describe:*		
16	Housekeeping / litter controlled?	Y	N	n/a	*Describe:*		
17	Spillages cleared up?	Y	N	n/a			
18	Any complaints received?	Y	N	n/a			
21	Bunded Storage sound & secure? (ELV, Derv/Gas Oil, Drums, Turnings, Engines etc)	Y	N	n/a			
22	Dust suppression in use?	Y	N	n/a	*Describe:*		
23	Fire Fighting equipment operational?	Y	N	n/a			
24	Fire watch / checks completed?	Y	N	n/a	*Describe:*		
25	Discharge point running clear?	Y	N	n/a			
26	Gullies, drains, interceptor inspected?	Y	N	n/a			
27	Site free from flooding/ponding?	Y	N	n/a			
28	Any Waste rejected from site	Y	N	n/a			
29	Batteries stored correctly? (Ref. EPP2.3)	Y	N	n/a			
30	**Other Issues to note (e.g. external activities potentially causing a nuisance/impact):**						

Appendix 3 – Site Plan and Drainage Plan



Drainage Plan



Appendix 4 -Persistent Organic Pollutants (POPs) –Guidance

Persistent organic pollutants (POPs) are chemical substances that do not break down in the environment. They can travel long distances and build up in the bodies of plants and animals. They are a danger to human health and the environment.

Equipment and machinery that may contain or emit PCBs, in metal production, recycling and machinery businesses include:

- electrical transformers
- process heating equipment
- high temperature hydraulic systems
- high voltage equipment
- fluorescent light ballasts
- electric arc furnaces.

The use of POPs is banned in the UK.

What substances are persistent organic pollutants?

There are currently 16 substances classed as POPs but more may be added in the future.

POPs can be grouped into pesticides, industrial chemicals and POPs that are released accidentally from combustion and some industrial processes, such as burning material and fuels. Some POPs may belong to more than one group.

Pesticides

- aldrin
- chlordane
- chlordecone
- dieldrin
- endrin
- heptachlor
- hexachlorobenzene (HCB)
- hexachlorocyclohexane (HCH), including lindane
- mirex
- toxaphene
- dichlorodiphenyltrichloroethane (DDT)

Industrial chemicals

- hexabromobiphenyl
- HCB

- polychlorinated biphenyls (PCBs)

POPs produced as by-products from industrial and combustion processes

- dioxins (polychlorinated dibenzo-p-dioxins (PCDD) and polychlorinated dibenzofurans (PCDF))
- HCB
- PCBs
- polycyclic aromatic hydrocarbons (PAHs)

Restrictions:

POPs must not be produced, marketed or used.

There are some exceptions to the ban on POPs:

Substances or materials containing POPs can be used for:

- laboratory-scale research
- as a reference standard, to calibrate scientific or analytical equipment
- if the POP occurs as an unintentional trace contaminant.

If POPs or POP-containing substances are permitted to be accepted and stored **they must be disposed of correctly.** If a material, waste or piece of equipment has a POP concentration **at or above the thresholds** stated in Annex IV of the POPs Regulation, **POPs and POPs containing wastes must be disposed of in accordance with Annex V, for example, by physico-chemical treatment or incineration.**

They will also need to be assessed if the POP or POP-containing substance or equipment is classed as hazardous/special waste. This will place additional requirements on how they are stored, transported and disposed of.

For further information regarding the assessment and disposal of POPs contact the local environmental regulator (e.g. Environment Agency or SEPA)

POPs produced from industrial processes

Unplanned releases of POPs must be avoided at all times, for example, dioxins, HCB, PCBs and PAHs, from industrial activities and/or from burning material and fuels. These are the most common POPs in the environment.

Releasing POPs

POPs are only likely to be released from industrial activities that require an IED permit. Sites must comply with the conditions in the permit, which will include requirements for controlling POPs releases.

Persistent Organic Pollutants in waste

If waste has a POP concentration **at or above the thresholds** stated in Annex IV of the POPs Regulation, you must dispose of it safely and in accordance with Annex V, for example, by physico-chemical treatment or incineration.

If a waste contains any concentration of POPs it may be hazardous/special waste. This will place additional requirements on how to store, transport and dispose of it. The level of contaminants in waste will need to be assessed to enable it to be **disposed of safely**.

Disposing and destroying waste that contains POPs

If waste containing POPs is required to be dispose of or destroyed, other than by a method approved in Annex V of the POPs Regulation, a **derogation** (permission to carry out an otherwise banned activity) must be obtained from the environmental regulator. A fee for any derogation application will be charged and the site will need to meet certain strict conditions to obtain approval.

Exemptions

Polychlorinated biphenyls in equipment

If the site contains any equipment containing polychlorinated biphenyls (PCBs) then a number of other requirements will need to be met - see SEPA /EA PCB guidance for further information.

[This guidance is based on SEPA and NIERA guidance 'NetRegs']

Appendix 5 – Waste Pre- Acceptance Form

EMR Waste Pre-Acceptance Form

Producer	
Company Name:	
Address:	
Post Code:	
Contact Name:	
Telephone No.:	
Premises code:	
SIC Code	

Waste Characteristics	
General Description:	EWC code:
Composition of the waste:	
Contamination present (approx.% or mg/Kg)	
Annual estimated amount (in Tonnes):	
Special handling requirements:	
Physical State: Liquid / Sludge / Semi-solid / Solid/Powder/Other (Specify)	

HP1 Explosive		**HP2** Oxidizing		**HP3** Flammable		**HP4** Irritant		**HP5** Harmful	
HP6 Toxic		**HP7** Carcinogenic		**HP8** Corrosive		**HP9** Infectious		**HP10** Toxic for Reprodu	
HP11 Mutagenic		**HP12** Release of an Acute Gas		**HP13** Sensitizing		**HP14** Ecotoxic			

Chemical Characteristics								
Details / Concentrations			***Details / Concentrations***			***Details / Concentrations***		
Acids/Alkalis	Yes/No		Ammonia/Nitrates	Yes/No		Solvents	Yes/No	
Metals/Metal Compounds	Yes/No		Halogenated Solvents	Yes/No		Water Reactive Materials	Yes/No	
Oxidising Agents	Yes/No		Radioactive Materials	Yes/No		Persistent Organic Pollutants (POPs)	Yes/No	
Other (e.g. pyrophoric / water reactive):								

Signed on behalf of client:

Name: Job Title:

Date: