MONARCH METALS LTD

Working Plan
Oldham Metal Recycling Facility

Unit B
Westwood Ind. Estate
Arkwright Street
Oldham
Greater Manchester
OL9 9LZ

CONTENTS

1.0 INTRODUCTORY COMMENTS

1.1 Monarch Metals Ltd

Monarch Metals Ltd (MML) operates a metal recycling facility within Westwood Industrial Estate, Arkwright Street, Oldham. MML accept a wide range of ferrous and non-ferrous metal grades from a variety of sources including demolition/construction jobs, traders, councils, and the general public.

MML was founded in 1985 in Oldham with an expansion into a second site in Rochdale in 1997. MML is a long-established family business, which has built up a vast wealth of knowledge and experience of the scrap metal industry during its 35+ years of trading. MML has a strong environmental ethos and is constantly striving to improve environmental performance.

1.2 Authorisations

The facility is currently regulated under Waste Exemption T9 (WEX301854) registered in March 2022 and due for expiry in March 2025.

Planning permission (ref: PA/048773/05) for the 'change of use of vacant industrial unit to processing of non-ferrous metals' was approved on 16th May 2005.

1.3 Management System

A condition of operating under an environmental permit requires MML to have a written management system in place. This Working Plan and wider Environmental Management System (EMS) is intended to satisfy this requirement. The purpose of the EMS is to identify and minimise risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of MML as a result of a complaint.

The EMS also demonstrates MML's strong environmental ethos and the enhancement of its environmental performance.

As a minimum, the entire EMS will be reviewed every 4 years to ensure that it accurately reflects current operations. Any significant changes to site operations will be added to the Management System as soon as practicable and approved by the Environment Agency where required. Such additions will be added prior to the designated 4 year review.

2.0 SITE DESCRIPTION

2.1 Site Location

The MML site forms a trapezoid shaped parcel of land accessible via Arkwright Street, Unit B, Westwood Industrial Estate, Oldham, OL9 9LZ. The site covers an area of approximately 0.23 acres and the national survey grid reference is SD 91354 05123.

The site is set within an industrial estate and has a predominantly urban location approximately 1.2km from central Oldham. The site has industrial warehouses located on its Eastern and Southern boundaries with residential housing located within residential housing within 150m of its Northern boundary. Beyond EMR Rochdale on the Northern and Eastern boundaries is grazing land. The site has Firgrove Playing Field located on its Western boundary.

Within 1km of the site, there are no Sites of Special Scientific Interest (SSSI) or Special Areas of Conservation (SAC). Within 10km of the site there are 5 SSSIs and 1 SAC including the Rochdale Canal situated 2.4km to the west of the site and the Lowside Brickworks 3km east of the site. Within 10km of the site there are also the following ecosystems:

- Semi-improved grassland
- Lowland dry-acid grassland
- Upland hay meadow
- Upland and lowland heathland
- Lowland Fens
- Blanket bog
- Upland flushes, fens and swamps
- Ancient and semi-planted woodland
- Fragmented Heath

A location map for the site is provided within the Management System folder. The potential impacts of the metal recycling operations on the sensitive receptors identified within 10km of the site are considered by the Environmental Risk Assessment within the Management System folder.

2.2 Geology and Hydrogeology

According to the relevant British Geological Survey map, the site is underlain by Pennine Lower Coal Measures which comprises of mudstone, siltstone and sandstone. There are recorded Devensian till superficial deposits comprising of clay.

According to the relevant bedrock aquifer designation map, the site is located on a Secondary A aquifer which is confirmed by the groundwater vulnerability map. The site is located within a 'Special Protection Zone II Outer Protection Zone' and is not in an area liable to flooding.

The relevant geological, hydrological, groundwater vulnerability and flood risk maps are provided in the Management System folder.

2.3 Site Layout

The entrance to the site is located to the western boundary of the site. The majority of the site is inside a warehouse building under cover with the offices and canteen/welfare facilities on the northern boundary of the site. This building is where Customers are paid for the incoming waste. Adjacent to the warehouse building is where other wastes are stored such as brake discs and cast iron. This area is not under cover. As shown on the Site Operations Plan, there are designated areas for the storage of empty bins and cables.

The warehouse building stores various non-ferrous grades in designated bins (including aluminium, brass and copper). Within the building, there is equipment used for treatment operations, including a cropping and stripping station. As shown on the Site Operations Plan, there is an area for the storage of cable to the north-eastern area of the site as well as storage bins for household wires, low grade wires and batteries to the south-west area of the site.

As seen on the Site Operations Plan, there are two scales within the warehouse building. The steel skip, as well as the general waste skip, is located on the southern perimeter of the site.

All waste treatment and storage areas are provided with an impermeable concrete paving and sealed drainage system.

A Site Operations Plan, detailing the location of buildings, plant and waste storage and treatment areas, and a Site Drainage Plan, are provided in the Management System folder.

2.4 Site Operating Hours

The operating hours for MML are:

- Monday – Friday: 08:00 – 16:30
- Saturday: 08:00 – 11:30
- Sunday and Bank Holidays: Closed

2.5 Site Security

Site security is high priority on metal recycling sites due to the inherent value of many of the materials and plant stored on site.

The MML site is secured by a combination of security measures, including: security metal fencing, lockable front gates (locked during non-operational hours) and 24/7 monitored CCTV which can be monitored remotely by Site Management and third-party security monitoring company (Aspire Monitoring) during non-operational hours. Site Management are notified by Aspire Monitoring when motion is detected on site during non-operational hours. More specific information is not provided here for security reasons.

All liquid storage tanks are stored in locations to prevent unauthorised access, especially by the public.

The integrity of site security is checked in accordance with the Site Inspection Sheet.

2.6 Impermeable Pavement and Sealed Drainage System

Under the regulation of an environmental permit, MML are required to treat and store all potentially contaminated wastes on impermeable surfaces within a sealed drainage system.

All waste treatment and storage areas are provided with impermeable concrete paving and sealed drainage system. The majority of the site operations are within a warehouse building, where there are no gullies but the concrete paving falls towards the centre of the site.

The western part of the site is uncovered, and any site-derived surface water, derived from rainfall and snowmelt, is directed via falls to a gully in this western area of the site. The surface water is then directed to foul sewer.

The integrity of the impermeable concrete paving and sealed drainage system is monitored weekly in accordance with the Site Inspection Sheet.

Location of drains, interceptors and other relevant drainage infrastructures are detailed on the Site Drainage Plan included within the Management System folder. The Site Inspection Sheet is also included in the Management System folder.

2.7 Inspection and Maintenance of Drainage System

The integrity of the impermeable concrete paving and wider sealed drainage system is inspected weekly. A record of infrastructure inspections and any remedial actions taken as a result of these inspections will be recorded on the relevant Site Inspection Sheet.

The Site Inspection Sheet has included within the Management System folder

2.8 Covered Buildings or Roofed Areas

As previously mentioned, the majority of the site, and the site storage and treatment operations, are situated within a warehouse building including the areas for the offices, welfare and canteen.

The condition of all buildings and roofed area is checked on a monthly basis in accordance with the Site Inspection Sheet and any necessary repairs are carried out as soon as practically possible. Records of inspection and any remedial work carried out on covered buildings or roofed areas are detailed on the relevant Site Inspection Sheet which is retained by MML.

2.9 Above Ground Tanks

Although information and guidance in this section refer to liquid waste, it is also the intention to use this Working Plan section to include/consider the storage of non-waste liquids such as fuels and water.

As per Section 3.2 within this Working Plan, MML are not authorised to accept liquids as a waste stream. Adherence to this when receiving and accepting waste will limit the quantity of liquid wastes stored on site to those from mobile plant maintenance. As such, MML currently has one above ground fixed tank for diesel to refuel mobile plant. The diesel tank is a free-standing, double-skinned tank which is labelled with its contents.

The tank is double-skinned with any associated pipework also being contained within a bund. MML stores hydraulic oil, Ad-Blu, as well as grease and lubricants in a designated storage cupboard. Nozzles of any associated pipework is placed over drip trays within the storage cupboard to prevent spillage.

The aforementioned tank and storage cupboard are located within the main warehouse on site, limiting public access.

The integrity of the above ground tank for diesel, as well as the designated storage cupboard, is checked weekly in accordance with the Site Inspection Sheet. Any damage and any required repairs and/or remedial works are recorded on the relevant Site Inspection Sheet and are completed as soon as practically possible. If any repairs and/or remedial works are being completed during the weekly inspection, this is also recorded on the Site Inspection Sheet to track progress. Records relating to such inspection are retained on site by MML.

A Fluid Storage Inventory, which details bulk fluids stored on the MML site, is included in the Management System folder.

3.0 RECEPTION AND VALIDATION OF WASTES

3.1 Accepted Waste Types

MML is intending to accept grades of ferrous and non-ferrous metals, batteries and cables. Metal grades are treated on site to improve transport efficiency and to meet the requirements of downstream facilities. Wastes received by MML are derived from the following streams:

- Contracts
- Public
- Construction companies

Wastes are delivered to site by the public, third-party carriers or MML fleet,

A copy of MML's current Upper Tier Waste Carriers licence is provided in the Management System folder.

3.2 Intended Waste Types (in accordance with the European Waste Catalogue)

Intended EWC Codes for acceptance by MML are listed below:

02. Wastes from Agriculture, Horticulture, Aquaculture, Forestry, Hunting and Fishing, Food Preparation and Processing	
02 01	**Wastes from Agriculture, Horticulture, Aquaculture, Forestry, Hunting and Fishing**
02 01 10	Waste metal
12. Wastes from Shaping and Physical and Mechanical Surface Treatment of Metals and Plastics	
12 01	**Wastes from Shaping and Physical and Mechanical Surface Treatment of Metals and Plastics**
12 01 01	Ferrous metal filings and turnings
12 01 03	Non-ferrous metal filings and turnings
15. Waste Packaging, Absorbents, Filter Materials, Wiping Cloths and Protective Clothing Not Otherwise Specified	
15 01	**Packaging (including Separately Collected Municipal Packaging Waste)**
15 01 04	Metallic packaging
16. Wastes Not Otherwise Specified in the List	
16 01	**End-of-Life Vehicles 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 Vehicle Components – catalytic converters containing refractory ceramic fibre (RCF) matting
16 01 22	Discarded components not otherwise specified
16 06	**Batteries and Accumulators**
16 06 01*	Lead batteries
17. Construction and Demolition Wastes (including Excavated Soil from Contaminated Sites)	
17 04	**Metals (including their Alloys)**
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals
17 04 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 the Preparation of Water Intended for Human Consumption and Water for Industrial Use	
19 01	**Wastes from Incineration or Pyrolysis**
19 01 02	Ferrous metals 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

3.3 Maximum Capacity of Operation

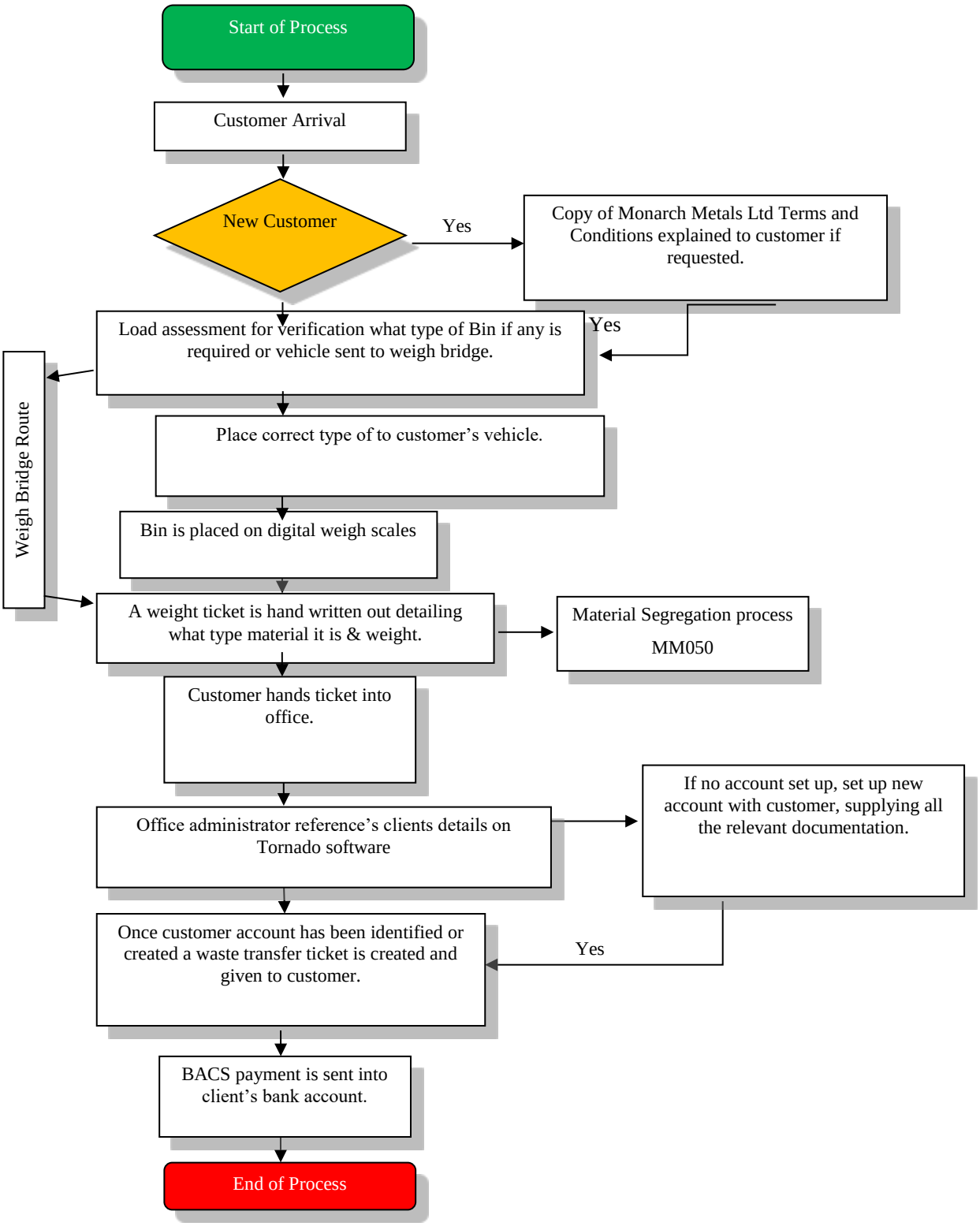
As required under the environmental permit, MML intend to accept a maximum of 5,000 tonnes of waste per year. Details on other limitations of activities can be found within Section 5.2 of this Working Plan.

As required when regulated under an environmental permit, MML are required to track the quantity of wastes received at the site by completing annual Waste Returns and quarterly Hazardous Waste Consignee Returns.

3.4 Pre-acceptance Procedures

New customers are subject to due diligence checks by MML prior to accepting waste onto site. New customers must provide company/individual ID and banking information to be set up on MML's system. Without providing ID and/or banking information, customers cannot be set up and MML will not accept waste from this customer. This includes customers from whom MML collects waste.

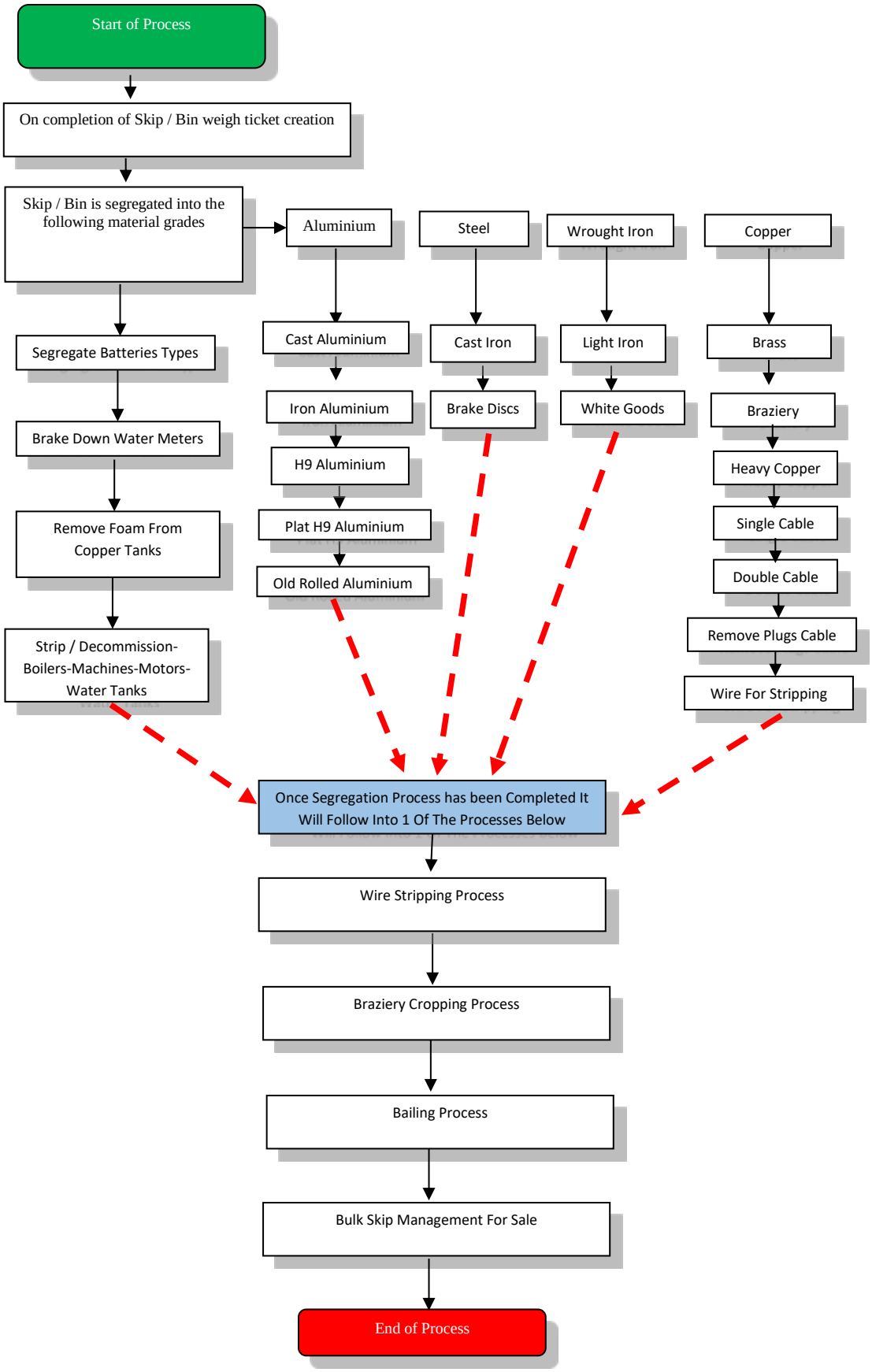
The following flow chart summarises the general procedure practiced by MML for accepting waste from customers.


Start of Process
Customer Arrival
New Customer
Yes
Copy of Monarch Metals Ltd Terms and Conditions explained to customer if requested.
Yes
Load assessment for verification what type of Bin if any is required or vehicle sent to weigh bridge.
Weigh Bridge Route
Place correct type of to customer's vehicle.
Bin is placed on digital weigh scales
A weight ticket is hand written out detailing what type material it is & weight.
Material Segregation process
MM050
Customer hands ticket into office.
Office administrator reference's clients details on Tornado software
If no account set up, set up new account with customer, supplying all the relevant documentation.
Yes
Once customer account has been identified or created a waste transfer ticket is created and given to customer.
BACS payment is sent into client's bank account.
End of Process

3.5 Waste Reception

Regardless of customer and method of transport to site (i.e. by the customer, by third-party Upper Tier Waste Carrier or MML fleet), all waste loads are inspected and then weighed on scales within the warehouse building. In accordance with the Scrap Metal Dealers Act 2013, the driver's ID is checked. If the incoming waste is accompanied with waste paperwork, its information is compared against the visual inspection to ensure an accurate description has been provided, as required to demonstrate Duty of Care compliance under the Environmental Protection Act 1990 and Waste Regulations 2011.

The vehicle is then directed to the designated area for unloading. While trained MML unload the vehicle, the waste is subject to further inspection as it is segregated by grade into bins. Such inspection also determines the receipt of unauthorised waste. Once fully unloaded, each segregated grade is weighed using the scales to determine the quantity of each grade received on site. The weights for each grade received is provided to the site office to process customer payment. The record of weight breakdown by grade is retained by MML. After which, the metal wastes are relocated to the designated storage areas by grade on site as demonstrated on the Site Operations Plan. The following flow chart summarises the segregation of the different wastes received by the site.


Start of Process
On completion of Skip / Bin weigh ticket creation
Skip / Bin is segregated into the following material grades
Aluminium
Steel
Wrought Iron
Copper
Segregate Batteries Types
Brake Down Water Meters
Remove Foam From Copper Tanks
Strip / Decommission- Boilers-Machines-Motors- Water Tanks
Cast Aluminium
Iron Aluminium
H9 Aluminium
Plat H9 Aluminium
Old Rolled Aluminium
Cast Iron
Brake Discs
Light Iron
White Goods
Brass
Braziery
Heavy Copper
Single Cable
Double Cable
Remove Plugs Cable
Wire For Stripping
Once Segregation Process has been Completed It Will Follow Into 1 Of The Processes Below
Wire Stripping Process
Braziery Cropping Process
Bailing Process
Bulk Skip Management For Sale
End of Process

When weighing out, the driver is provided with an Advice Note Weighbridge Ticket (and a completed copy of accompanying Waste Paperwork) which is generated from the information outlined previously. The Advice Note Weighbridge Ticket and any accompanying Waste Paperwork is complete with all information required by the Scrap Metal Dealers Act 2013, Hazardous Waste Regulations 2005 and Waste Regulations 2011.

Such information includes: date and time received, vehicle registration number, customer name, waste carrier name and registration number, waste description (including European Waste Catalogue code) and weight of waste. Copies of all Advice Note Weighbridge Tickets generated and any completed Waste Paperwork are retained by MML to demonstrate compliance with Duty of Care requirements.

A Site Operations Plan, detailing the location of designated waste storage areas by grade, is provided in the Management System folder.

3.6 Waste Inspection

Waste received on metal recycling sites is inspected for two purposes. The first is economic and the second is to ensure that waste received is authorised under the regulated environmental permit. The metal recycling industry generally has a very good understanding of the materials received and purchased at their sites. Given the nature of the waste streams accepted and visual inspections completed by competent MML staff, the site is unlikely to receive unauthorised waste.

Waste inspection upon receipt determines whether the incoming waste is authorised under the permit and ensures any accompanying paperwork contains accurate, legislatively required information.

3.7 Weighbridge/Scales

As waste management sites pay for their receipts of waste by weight, they are typically fitted with weighbridges to weigh vehicles entering and leaving the site. However, due to the size of the site and volume of wastes being accept by this site, platform scales are used to determine the weights of the individual grades being accepted. After the wastes are segregated by grades, they are placed into separate bins and weighed using the platform scales to determine the individual grade weights. The Site Operations Plan demonstrates that the MML scales are located within the main warehouse of the site.

The weight of waste received and dispatched is recorded and printed on the Advice Note Weighbridge Ticket and appropriate Waste Paperwork (Waste Transfer Note or Consignment Note). MML retain all Advice Note Weighbridge Tickets and appropriate Waste Paperwork for all received and dispatched waste, allowing the weights to be accurately recorded on the annual Waste Returns and quarterly Consignee Returns.

The scales used for weighing are calibrated in accordance with the manufacturers recommendations.

3.8 Radiation Detectors

The site does not have radiation detectors installed on site.

3.9 Lighting

The site does not have adequate lighting to inspect waste after dark. As such, waste is only accepted when waste inspection can be completed effectively.

3.10 Waste Acceptance

Incoming waste material is inspected by MML for multiple reasons:

- Determines incoming waste if received in a mixed load
- Checking waste is authorised by the permit
- Ensuring that any accompanying waste paperwork is accurate and contains all information required by the Scrap Metal Dealers Act 2013, Hazardous Waste Regulations 2005 and Waste Regulations 2011.

Once MML are satisfied with findings from receipt and inspection, the waste will be accepted. The empty vehicle will return to the weighbridge where a completed Weighbridge Ticket, any accompanying waste paperwork and requisite payment are issued to the Customer. Payment is made electronically or by cheque, in accordance with the Scrap Metal Dealers Act 2013.

3.11 Quarantine Storage & Rejection of Wastes

Waste may be rejected for two reasons, either on commercial grounds or due to contravening the environmental permit. Wastes rejected for commercial reasons will not be recorded as it has no impact on waste operations on site.

Given the strict Waste Acceptance Procedures employed by MML it is unlikely that any unauthorised waste will be tipped at the Arkwright Street, Oldham site. However, in the unlikely event of unauthorised waste being discovered on site, one of the empty bins stored in the uncovered western area of the site will be used as a temporary quarantine container. A competent MML employee will then complete a 'Non-conforming Product Report' which will be retained on site by MML.

As per the flow chart within Section 3.13 below, both the customer and Environment Agency will be informed of the permit breach and the unauthorised waste will be dispatched from site to a suitably permitted facility as soon as practically possible. Receipt of unauthorised waste will be recorded and stored by MML.

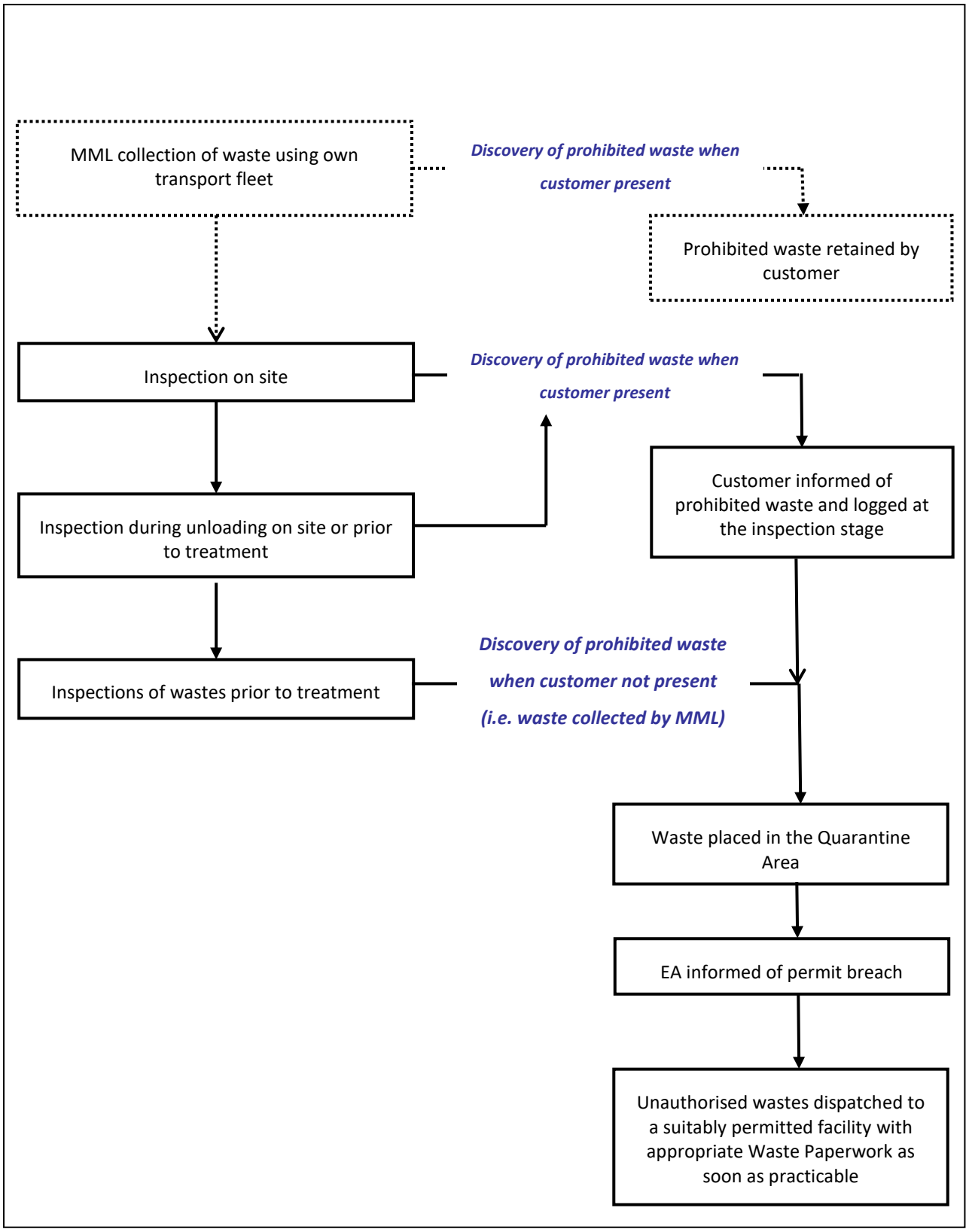
A copy of the 'Non-conforming Product Report', is provided in the Management System folder.

3.12 Prohibited Wastes

The following wastes are prohibited for acceptance by MML:

- Wastes whose type and EWC Code are not listed in Section 3.2 of this Working Plan
- Wastes consisting solely or mainly of dusts, powders or loose fibres
- Wastes that are in a form which is either sludge or liquid
- Wastes failing to conform to the description in the documentation supplied by the producer and holder

The following flow chart summarises the general procedures practiced by MML to ensure as far as reasonably practicable that prohibited wastes are not received/accepted on site.



NB – the dotted/dashed parts of the flow chart are only applicable when MML collect the waste from a customer facility

3.13 Asbestos

The site is not authorised to accept asbestos as a waste stream.

The likelihood of asbestos being inadvertently accepted onto site is considered low due to the inspection of each vehicle and waste prior to acceptance. Furthermore, the phasing out of asbestos in brake and clutch linings during the late 1990s, and the common practice of replacing these items during the life of the vehicle, has significantly reduced the risk of these items being received.

In the event of the discovery of asbestos on site, the procedures provided in the Accident Management Plan would be followed and an Incident Record Form would be completed.

An Accident Management Plan is provided within the Management System folder.

3.14 Suspected Explosive Devices and Large Diameter Munitions

In the event of the discovery of any large diameter shell, munitions or other suspected explosive device on site, the procedures provided in the Accident Management Plan would be followed and an Incident Record Form would be completed.

An Accident Management Plan is provided within the Management System folder.

3.15 Waste Consisting Solely or Mainly of Dusts, Powders or Loose Fibres

These types of waste are specifically prohibited by MML and, in most cases, should be easily identified at the inspection stage and rejected.

As per the procedures in Section 3.13, the discovery of such wastes by MML staff will be quarantined and rejected from site. This will be recorded in the Site Diary.

3.16 Sealed Canisters

The inspection and segregation of wastes by grade upon unloading means the risk of accepting sealed canisters is very low.

In the unlikely event were MML staff discover sealed canisters on site, any sealed canisters are segregated in the Quarantine Area. Where possible, the original customer will be traced and notified that the receipt of sealed canisters breaches MML's procedures and will be dispatched to a suitable licenced facility as soon as practicable in accordance with the diagram in Section 3.13 of this Working Plan.

3.17 Analysis of Incoming Wastes

Chemical analysis of wastes entering the site will not be required as a routine. Visual inspections at the acceptance stage and during unloading is typically adequate for the purpose of checking waste inputs.

Where conformation checks are required (e.g. to identify if suspect wastes contain asbestos) samples would be taken and submitted for analysis, unless accompanied by qualifying certificates. This analysis would be taken prior to the waste being accepted by MML.

An accredited laboratory (e.g. UKAS, MCERTs) will be commissioned to undertake the required analysis for MML, and the results will be interpreted independently in line with the requirements set out in the environmental permit.

3.18 General Analysis

Wastes discovered on site which are suspected to be prohibited will either be; assumed to be prohibited and therefore segregated for off-site disposal or analysed to confirm their composition then handled accordingly and removed from site as soon as practically possible.

4.0 STORAGE OF WASTES

4.1 Materials Storage

Waste types and their storage locations on site are indicated on the Site Operations Plan. The Site Drainage Plan also indicates any pollution prevention and control measures in place for waste storage. Wastes will be stored relative to their combustibility and in accordance with any clearances requested by the Fire & Rescue Service (to allow for emergency access), Environment Agency guidance and regulatory requirements. This has been discussed in further detail in the Fire Prevention Plan for the site which forms part of the EMS.

4.2 Storage of Metals by Grade

The following storage operations are undertaken at the MML site:

R13 – Storage of waste consisting of materials intended for submission to any operation numbered R1 to R12, but excluding temporary storage, pending collection on the site where it is produced.

D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection on the site where it was produced).

i) **Ferrous Grades** – typically unloaded and stored in designated bins/skips on impermeable concrete paving within the sealed drainage system.

ii) **Non-Ferrous Grades** –Non-ferrous grades (e.g. Aluminium, Old Rolled Aluminium, Zinc, Tin, Brass, Copper, Lead) are stored in designated bins within the warehouse building which has impermeable concrete paving within the sealed drainage system.

iii) **Cable** – typically unloaded and stored in the designated bins inside the warehouse building on impermeable concrete paving within the sealed drainage system.

iv) **Non-Metal Wastes** – separated from metal loads and stored within designated bins/skips on impermeable concrete paving within the sealed drainage system

v) **Batteries** – authorised to be received as discrete loads, arising from mobile plant maintenance or upon receipt on site. Batteries are sorted and separated (the only treatments of batteries permitted) from other wastes on site and upright in plastic pallet boxes and stored exclusively within the designated battery store to prevent the ingress of water. The designated battery store is located on impermeable concrete paving within the sealed drainage system located inside the warehouse building. MML store a maximum 5 battery boxes (total 5m^3) of waste lead-acid vehicle batteries (waste code 16 06 01*) shall be stored at the site at any one time.

A Site Operations Plan, detailing the location of buildings, plant and waste storage and treatment areas is provided in the Management System folder.

4.3 Storage of Raw Materials by Type

i) **Diesel** – as detailed in Section 2.10 of this Working Plan, diesel is stored in a free-standing, double-skinned tank which is labelled with its contents. The tank is bunded with any associated pipework also being contained within the bund. The diesel storage tank is located within the warehouse building on site.

4.4 Maximum Storage Quantities

MML will adhere to the following maximum storage quantities:

- The maximum quantity of hazardous waste stored at site shall not exceed 50 tonnes at any one time.
- No more than 10 tonnes of intact waste vehicle catalytic converters (waste code 16 01 21* or 16 01 22) shall be stored at the site at any one time.
- No more than 5 battery boxes (total 5m³) of waste lead-acid vehicle batteries (waste code 16 06 01*) shall be stored at the site at any one time.

4.5 Maximum Storage Times

MML tailors operations to minimise the quantity of time waste material is stored on site and in accordance with the storage durations outlined in the Fire Prevention Plan within the EMS. As such, no wastes are stored on site for longer than 3 months regardless of whether it is destined for disposal or recovery.

A copy of MML's Fire Prevention Plan is provided in the Management System folder

4.6 Segregation of Incompatible Wastes

Typically the types of wastes handled at the MML site will not be reactive and will therefore be unable to cause this type of hazard. However, as good practice, wastes will be segregated.

5.0 TREATMENT OF WASTES

5.1 Materials Treatment

Waste treatment operations authorised in Section 5.2 of this Working Plan will occur within the warehouse building at fixed locations which are is marked on the Site Operations Plan.

5.2 Treatment by Waste Type

The below table summarises the waste operations MML are authorised to complete on site.

Recovery/Disposal Code & Description	Limits of Activities
• R4 - Recycling/reclamation of metals and metal compounds. • R13 - Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) • D15 - Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	• Treatment consisting only of sorting, separation, grading, shearing, baling, compacting, manual dismantling (cable stripping), and cutting using hand-held equipment only, of ferrous metals or alloys and non-ferrous metals into different components for recovery • There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes. • No more than 5 battery boxes (total 5m^3) of waste lead-acid vehicle batteries (waste code 16 06 01*) shall be stored at the site at any one time. • Wastes shall be stored for no longer than 3 years prior to recovery. • The maximum quantity of hazardous waste stored at the site shall not exceed 50 tonnes at any one time. • There shall be no treatment of catalytic converters, including decanning, other than manual sorting and separating the catalytic converters from other wastes. • No more than 10 tonnes of intact waste vehicle catalytic converters (waste code 16 01 21* or 16 01 22) shall be stored at the site at any one time.

a) <u>Sorting, Separation and Grading</u>

As detailed in Section 5.2 of this Working Plan, metals are sorted and separated following inspection during unloading. Once inspected by MML staff, metals are then stored and weighed by grade, following the procedure within Section 3.5 of this Working Plan. Grades

are stored in designated bins within the warehouse building or in designated areas in the western part of the site.

Where required, manual separation may also be required which involves the separation of different ferrous and non-ferrous grades. For example, the removal of brass taps from a stainless steel sink.

To confirm, all batteries are sorted and separated from other wastes on site and are stored upright in plastic pallet boxes within the designated battery store to prevent the ingress of water.

Sorting may also include the removal of incidental non-waste material, such as packaging, which would be stored in a designated general waste skip.

b) Cropping

A cropper is provided in the warehouse building for cropping non-ferrous metals, such as copper pipe, which assists with baling operations. As the cropper is located with the warehouse building, it is located on impermeable concrete paving within the sealed drainage system.

c) Baling

Following sorting, separation and grading, non-ferrous metals may be baled to increase density of improved transport.

6.0 DISPATCH OF OUTPUTS AND RESIDUES

6.1 Inspection of Loads for Dispatch

Outgoing loads from the site will relate to the following:

- Metal grades generated by the metal recycling processes for onward processing/recycling (non-hazardous)
- Non-metal wastes generated by the metal recycling processes for onward processing/recycling (non-hazardous)
- Waste liquids (e.g. waste fuel, hydraulic oil) from mobile plant and equipment (hazardous)
- Oil contaminated materials relating to spillages (hazardous)
- Any other wastes generated by site infrastructure works (generally non-hazardous)
- General waste (e.g. packaging) and litter (non-hazardous)
- Site-derived (e.g. from mobile plant) and batteries (hazardous)

A 'Site Inputs and Outputs Summary' is provided in the Management System folder.

6.2 Waste Dispatch and Recording

Wastes are dispatched from site by Upper Tier Waste Carriers. MML is an Upper Tier Waste Carrier/Broker/Dealer (registration reference: CBDU363414).

Waste type (description and EWC Code), weight and other details required to satisfy relevant regulatory requirements (e.g. Waste Regulations 2011 and Hazardous Waste Regulations 2005) are entered onto the Waste Transfer Note or Hazardous Waste Consignment Note. Wastes dispatched from site will be recorded and records retained for a minimum 6 years.

All relevant licences and authorisations with respect to the Duty of Care of dispatched waste (e.g. haulier, facilities) are retained on site by MML.

A copy of MML's current Upper Tier Waste Carriers licence is provided in the Management System folder.

6.3 Analysis of Outgoing Wastes

For the purpose of the Duty of Care, analysis of wastes exported from site may be required.

An accredited company (e.g. UKAS, MCERTS where relevant) would be commissioned to undertake the correct preparation and analysis for the tests to be undertaken, and the results will be interpreted independently in line with the receiving site's requirements, including those associated with their permit.

Without analysis, waste oils are classified as hazardous waste and, therefore, handled, transported and disposed of accordingly.

6.4 Waste Oils

Waste oils, although not specifically received by MML, will accumulate over time from activities such as the maintenance of site plant. Any containers of waste oil will be contained to prevent leaks or spillages. Storage and disposal of waste oils will be carried out in accordance with the relevant Environment Agency guidance.

A copy of the Environment Agency guidance 'Oil Storage Regulations for Business' is included in the Management System folder.

7.0 CONTROL AND MONITORING OF EMISSIONS

7.1 Measures to Control of Dust (including Particulates), Mud and Debris

The nature of the wastes received on site and treatment operations (cropping, baling, separation etc.) are unlikely to generate dust, mud and debris. All storage and treatment areas are completed on impermeable concrete paving thereby limiting the amount of mud and debris distributed by vehicles and mobile plant – the integrity of the impermeable concrete paving is inspected weekly in accordance with the Site Inspection Sheet. Any remediation/repair works are recorded on the relevant Site Inspection Sheet and are completed as soon as practicable. Waste storage and treatment areas are also designed to minimise the handling of waste which also limits the generation of dust, mud and debris. Any wastes and residues associated with operations are dispatched from site as soon as practicable.

The wastes authorised do not typically give rise to dust, mud and debris. The inspections completed by trained MML staff upon receipt on site will prevent acceptance of unauthorised wastes with the potential to give rise to the aforementioned emissions. MML will also comply with a maximum permitted acceptance input of 5,000 tonnes of waste, which limits the potential for dust, mud and debris generation.

The site is inspected on a daily basis for the accumulation of dust, mud and debris. Any excessive levels of dust, mud and/or debris across the site will be recorded on the relevant Site Inspection Sheet. Any remedial actions required or implemented will also be recorded on the relevant Site Inspection Sheet which is retained by MML. The majority of treatment operations are located within the warehouse building which minimises the distribution of any dust, mud and debris to off-site local receptors. The integrity of the perimeter fencing is inspected daily in accordance with the Site Inspection Sheet.

Cropping and baling are core treatment operations completed on site and such operations are unlikely to give rise to the aforementioned emissions. Staff are trained in relevant Risk Assessments and Safe Working Procedures which allows treatment and storage operations to be completed effectively to minimise dust, mud and debris generation. Furthermore, baling can only be completed using the baler in its fixed position – this prevents the spread of mud and debris from baling operations.

Weather conditions, particularly wind direction, are recorded on the Weather Recording Chart on a daily basis to manage operational activities with the potential to impact local receptors from the aforementioned emissions. Consideration of weather conditions allows Site Management to plan operations to minimise the impact of emission generation on local receptors. By recording weather conditions on a daily basis, the information can be used when investigating any received complaints.

Prevention Measures	Suppression Measures
Daily review of dust, mud and debris on site in accordance with the Site Inspection Sheet	Deployment of hand-sweeping
Weekly review of impermeable concrete paving on site in accordance with the Site Inspection Sheet	Wetting of impermeable concrete paving
Daily review of perimeter fencing on site in accordance with the Site Inspection Sheet	
Prohibition of dusty waste acceptance, enforced thorough inspection from MML staff when received on site	
Minimise handling of wastes by parking/placing vehicles in appropriate places when received on site	
Minimise storage period in accordance with the Fire Prevention Plan	
Acceptance tonnages below 5,000 tonnes of waste per annum	
Staff are effectively trained in the relevant Risk Assessments and Safe Working Procedures	
Daily recording of weather conditions on the Weather Recording Chart and planning operations in accordingly	
Dispatch of wastes and operational residue as soon as possible	

The Site Inspection Sheet and Fire Prevention Plan are included in the site's Management System folder.

7.2 Measures to Control of Point Source Emissions to Air

The site has no point source emissions to air.

7.3 Monitoring of Dust, Fibres & Particulates

There will be no requirement to monitor dust, fibres and particulates other than the daily inspection of dust, mud and/or debris recorded on the relevant Site Inspection Sheet.

7.4 Odours and Fumes

Weather conditions, particularly wind direction, are recorded on the Weather Recording Chart on a daily basis to manage operational activities with the potential to impact local receptors from odour. Consideration of weather conditions allows Site Management to plan operations to minimise the impact of odour nuisance on local receptors. By recording weather conditions on a daily basis, the information can be used when investigating any received complaints.

The wastes to be received by MML are not odorous waste streams. As such, there will be no significant odours associated with these wastes.

Any leaks and spillages will be cleaned up as soon as practicable with absorbent material by trained MML staff. This will minimise the odours and fumes generated by site operations, thus limiting impact on identified receptors.

7.5 Noise

While MML tailors operations to minimise impact of noise on local receptors, it should be noted that an increase or change of noise can be an important indicator in determining whether mobile plant or equipment require maintenance. As such, noise is monitored on an ongoing basis.

The site is designed to minimise impact of noise on receptors. Aside from the perimeter walls (which are inspected daily in accordance with the Site Inspection Sheet), baling operations which may generate noise, are located within the warehouse building which reduces the impact towards human receptors identified in the Environmental Risk Assessment. Cropping operations, which has the potential to generate noise, are also completed exclusively within the warehouse building.

Waste is stored to minimise handling and is placed accordingly, opposed to being dragged or dropped.

All mobile plant and equipment are subject to pre-use checks and ongoing maintenance by competent MML staff as well as servicing as per manufacturer guidelines. Daily and weekly inspection checks on all mobile plant on site are completed by competent MML staff. When required, competent contractors complete maintenance and servicing on mobile plant and equipment. Where necessary, plant is also subject to Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 and Provision and Use of Work Equipment Regulations (PUWER) 1998 inspections. Staff are trained in the use of mobile plant and equipment to ensure effective use and minimise excessive noise generation.

There is strict adherence to operating hours, especially at the weekend where there are potentially more receptors impacted.

Any detection or noise complaints are investigated and actioned where possible.

Daily and Weekly plant inspection sheets are included in the site's Management System folder.

Prevention Measures	Suppression Measures
Mobile plant and equipment daily and weekly checks	Noise monitoring and further risk assessment where required
On-going assessment of noise in accordance with the Site Inspection Sheet	
On-going maintenance of mobile plant and equipment by competent MML staff	
Staff are trained in the use of mobile plant and equipment	
Mobile plant and equipment are serviced as per manufacturer and regulatory guidelines by competent contractors	
Strict adherence to operating times	
Daily review of perimeter fencing on site in accordance with the Site Inspection Sheet	
Baling completed at the designated baling treatment are which is located inside the warehouse building	
Minimise handling of wastes by parking/placing vehicles in appropriate places when received on site	

Consideration of noise and vibration has been covered within the Site-Specific Environmental Risk Assessments, which are included within the Management System folder.

7.6 Pests

The waste types received do not usually attract pests or vermin. However, in the unlikely event of pests or vermin being identified as an issue on the MML site, a pest control company would be contracted to provide traps and monitor the situation.

7.7 Litter and Debris

Much of the waste received at the MML site is heavy and unlikely to become wind-blown. As well as for security reasons, the site has perimeter fencing to minimise impact of site-derived litter and debris on local receptors identified in the Environmental Risk Assessment. As such, any litter that may arise will be retained within the site boundary.

In accordance with the Site Inspection Sheet, daily site inspections are carried out to check for accumulation of litter and debris across the site, as well as deploying litter picking and hand-sweeping when required.

7.8 Controlling Emissions to Surface Water

The site does not discharge to surface water.

The Site Drainage Plan is included within the Management System folder.

7.9 Controlling Emissions to Sewer

All waste treatment and storage areas are provided with impermeable concrete paving and sealed drainage system. Site-derived surface water, derived from rainfall and snowmelt, is directed via falls to a gully in the western area of the site. There are no gullies within the warehouse building but the impermeable concrete falls towards the centre of the site. The surface water from the run-off in the western part of the site is discharged to foul sewer.

The integrity of the impermeable concrete paving and sealed drainage system is monitored weekly in accordance with the Site Inspection Sheet.

An emphasis on housekeeping, including following the procedures outlined in section 7.1 to minimise mud and debris build up on the site's surface, also plays a key role in maximising the quality of the discharge to foul sewer.

7.10 Controlling Emissions to Ground and Groundwater

The incidental release of contaminated surface run-off to the underlying ground and groundwater is prevented by the provision of impermeable concrete paving within the sealed drainage system as described in Section 2.6.

7.11 Responding to Complaints

MML have not received complaints previously about waste operations or associated emissions. Regardless, MML take complaints seriously and will use a Complaints Record template to ensure that all the information necessary to fully investigate the complaint is recorded. The complainant will be kept informed at all times during the investigation.

MML will retain all Site Inspection Sheets and other relevant site records (e.g. CCTV, dispatched wastes) as well as records relating to site operations, plant, equipment and information relating to any issues which impact upon operational efficiency. As detailed previously, the weather is also recorded daily (in accordance with the Site Inspection Sheet) on the Weather Recording Chart and this information is retained on site.

All the retained information will be used support the investigation and substantiate any complaints received.

A 'MML Complaint Record' template and 'MML Weather Recording Chart' are included in the Management System folder.

8.0 USE OF RAW MATERIALS AND ENERGY EFFICIENCY

8.1 Use and Control of Raw Materials

MML uses a variety of raw materials such as diesel and grease used for mobile plant.

With the exception of grease and lubricant, raw materials are stored in labelled, double-skinned tanks and containers which have any associated pipework placed over drain trays to prevent spillage. As seen on the Site Operations Plan, the raw materials are stored within the warehouse building to minimise potential access to the public.

A Fluid Storage Inventory, which details bulk fluids stored on the MML site, is included in the Management System folder.

8.2 Management of Wear Parts

The majority of used parts have a positive scrap value and are transferred to the relevant scrap stockpile once they reach their end of life. Most worn parts are removed and replaced, or are re-used on site. All other worn out components are stored in designated areas of the site on impermeable concrete paving for the minimum amount of time necessary to arrange their sale or disposal.

8.3 Process Efficiency and Energy Consumption

MML has tailored operations to maximise process efficiency and reduce energy consumption. All MML staff complete induction and basic training as well as task-specific training where appropriate. Competent staff throughout the business (waste inspection staff, mobile plant operators) effectively and efficiently allows MML to maximise the throughput of waste as well as reduce fuel and energy. This will allow the site to be more efficient.

MML promote process efficiency relating to transport in the following ways:

- Facilitates the delivery of wastes to site by the public and third-party Upper Tier Waste Carriers
- Metals are cropped and baled to maximise quantity being removed from site per load
- Batteries are separated and dispatched from site to a suitably licenced facility only when there is a sufficient load or the maximum quantity has been stored.

MML has facilitated process efficiency by maintaining operational equipment. All mobile plant and equipment is subjected to the relevant manufacturer service schedules, and where relevant, statutory inspections under LOLER and PUWER. All mobile plant and equipment is also subject to the pre-use checks with daily and weekly mobile plant inspection sheets. Maintaining operational equipment minimises risk of downtime and enhances process

efficiency.

Daily and Weekly plant inspection sheets are included in the site's Management System folder.

8.4 Water Use

MML obtains water from mains supply and is used for welfare and sanitary purposes. Given that water for these activities is mains-fed, this means that there is always sufficient water supply for these uses.

9.0 ACCIDENTS, BREAKDOWNS AND CLOSURE

9.1 Control of Leaks & Spillages on Site

A leak or spillage may not be polluting in itself but may lead to pollution if not properly controlled and remediated. Minor or insignificant leaks or spills would be covered by routine site procedures and housekeeping.

MML has one above ground tank for diesel to refuel mobile plant. The diesel tank is a free-standing, double-skinned tank which is labelled with its contents. The tank is bunded with any associated pipework also being contained within the bund. MML stores hydraulic oil, Ad-Blu as well as grease and lubricants in the designated storage cupboard. Nozzles of any associated pipework is placed over drains trays within the storage cupboard to prevent spillage. Both the tank and storage cupboard are located within the warehouse building which minimises unauthorised pubic access.

Spillages or leaks of liquids may also arise from site operations (e.g. refuelling of plant). Any spillages or leaks are contained and controlled by the use of suitable absorbent material. Absorbents (e.g. sand) are stored on site and will then be collected and packaged accordingly for removal from site as hazardous waste following use.

Staff are trained in the effective refuelling technique and use of absorbent material. Records of training are retained on site by MML.

Any leaks or spillages on site will be recorded on the Site Inspection Sheet and an Incident Record Form is completed.

An Accident Management Plan and Site Inspection Sheet is provided within the Management System folder.

9.2 Fire Control and Suppression Procedures

No burning of waste is allowed on site.

Metal recycling operations are controlled by competent staff and maintained equipment to minimise the risk of fire. Site staff are also trained in the location and use of fire extinguishers and other firefighting equipment to effectively suppress fires. Records of training and maintenance are retained on site by MML.

The suppression procedure for on site fires is detailed in the Accident Management Plan and the Fire Prevention Plan. This includes effective site layout (metal skips and bins, site equipment/infrastructure, combustible waste and non-waste liquids, mobile plant storage etc) to facilitate access and suppression for MML staff or Fire & Rescue Services (F&RS) and other required emergency services.

The aforementioned documents also reference the responsibility of Site Management to call the F&RS to extinguish the fire when deemed necessary (e.g. when unsafe for competent staff to extinguish) as well as calling any other emergency services required. This is further detailed in the Fire Prevention Plan.

Firewater would be treated as a spillage and the procedures relating to major spillages in the Accident Management Plan would be followed.

Once extinguished and safe to return to site, any residues arising from a fire will be characterised for processing. Where possible, waste with an economic metal content will be processed to extract the metals. All other wastes will be dispatched from site for disposal at a suitably permitted facility.

All reporting and recording will be completed in accordance with the procedures in the Accident Management Plan and the Fire Prevention Plan. Any fires on site will be recorded on an Incident Record Form in accordance with the Accident Management Plan.

The Accident Management Plan and Fire Prevention Plan are provided within the Management System folder.

9.3 Fires to which the Fire & Rescue Services will be called

Site Management will assess and decide whether staff should attempt to extinguish the fire using equipment on site. If the Fire & Rescue Services are required, the call is made from the main building.

The Accident Management Plan and Fire Prevention Plan are provided within the Management System folder.

9.4 Maintenance of Plant

All mobile and fixed plant is subjected to maintenance and servicing in accordance with manufacturer guidelines and, where relevant, statutory inspections under LOLER and PUWER.

All maintenance completed on plant and equipment is recorded electronically and associated paperwork is retained on site by MML. Where appropriate/evidenced, maintenance is also recorded on the relevant Site Inspection Sheet. MML has an electronic alert system as a reminder for plant maintenance and servicing.

All equipment are inspected subject to relevant pre-use checks before use and serviced as per manufacturer guidelines.

9.5 Plant Breakdown

Pre-use checks on mobile plant and equipment as well as regular maintenance will minimise the likelihood of plant breakdown.

Downtime in baling and cropping operations would have the greatest environmental consequence. Whilst the site has some capacity to store waste during this downtime, it is subject to Site Management discretion as well as maintaining compliance with the maximum storage limits outlined within Section 5.2 of this Working Plan and in the Fire Prevention Plan. If baling and cropping operations have not resumed prior to reaching the maximum storage capacities outlined within Section 5.2 of this Working Plan and Fire Prevention Plan, the site would not accept any new waste and would inform customers accordingly.

9.6 Site Closure and Decommissioning

The site's impermeable concrete paving within the sealed drainage system would protect the underlying soil and groundwater during decommissioning. Decommissioning would involve the removal of wastes from site, and the removal and re-use of equipment where possible.

A Decommissioning Plan would be provided to identify the items of plant/equipment that could be recycled and the environmental risks involved in the decommissioning process.

Final stages of decommissioning would involve cleaning and hand-sweeping of the site's surface as well as the cleaning of the interceptors and gullies.

10.0 RECORD KEEPING, REPORTING AND NOTIFICATIONS

10.1 Storage of Site Records

MML will keep records relating to incoming and dispatched wastes on site for a minimum of 6 years. In the case of records relating to off-site environmental effects, or the condition of the land or groundwater, these will be retained by MML until the decommissioning of the site.

Records retained will include:

- Site Inspection Sheets
- Weather Record Charts
- Waste paperwork and tickets
- Environment Agency submissions
- Information relating to accidents and incidents on site
- Employee training records
- Customer-specific records of the receipt of unauthorised waste (stored electronically)
- Site plans
- Written management system

All records will stored on site in a legible manner and available for inspection by the Environment Agency at all times.

The table below details the information required to be submitted to the Environment Agency and associated timeframe.

Requirement and Method	Timeframe
Waste Returns	Annually
Hazardous Waste Consignee Returns	Quarterly

10.2 Environment Agency Notifications

The table below details any situation in which MML will report to the Environment Agency.

Situation	Reporting Requirement
Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	Notify the Environment Agency without delay (within 24 hours). Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours
Breach of a limit specified within the environmental permit for the site.	Notify the Environment Agency without delay (within 24 hours). Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours
Detection of significant adverse environmental effects	Notify the Environment Agency without delay (within 24 hours). Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours
Response to Environment Agency request to undertake monitoring and/or spot sampling	At least 14 days prior to the commencement of the monitoring and/or spot monitoring
Changes to MML's trading name, registered name or registered office address. Any steps taken regarding the company going into administration, being entering a voluntary arrangement or being wound up	Notify the Environment Agency within 14 days (unless disclosure is permitted by Stock Exchange rules)
Death of the named operator, any change in the operator's name or address, any steps taken with a view to the operator going into bankruptcy or entering into a composition or arrangement with creditors	Notify the Environment Agency within 14 days (unless disclosure is permitted by Stock Exchange rules)
Site closure	Provide the Environment Agency with at least 14 days notice before implementation of any part of a site closure plan

11.0 STAFF MANAGEMENT AND COMPETENCE

11.1 Company Structure

MML uses a formal reporting structure with respect to operational or environmental issues. All staff are aware of the reporting structure and who to report environmental issues to.

The 'Company Structure Organogram' is provided in the Management System folder.

11.2 Staff Training

Upon commencement of employment, staff are given an induction course and they are advised of the environmental aspects and impacts of their operations as well as role-specific duties and responsibilities. Staff are informed and updated of changes in procedures and any changes to emergency preparedness and response requirements.

MML provide training to all staff through a combination of in-house training and, where relevant, external training courses. All staff are also made aware of MML's environmental policies as well as associated individual roles and responsibilities through Toolbox Talks and Safe Working Procedures. Aside from Toolbox Talks, there is more specialist training given to staff relating to: first aid, fire warden, and mobile plant training which are provided by external providers. Refresher course for specialist training and staff competence assessment are completed when required.

All training is recorded in the training matrix and records of training are retained by MML.

11.3 Site Attendance and Operator Competence

The site will be adequately manned whenever waste handling and treatment operations are being carried out. MML will ensure a minimum of one competent Operator, as certified by WAMITAB, is present on site for at least the minimum length of time specified in Environment Agency guidance.

At present, MML has one staff member that has completed an Operator Competence award certified by WAMITAB. A copy of the initial competence certificate and subsequent continued competence certificates will retained by MML.

The certificate for the MML staff with the WAMITAB-certified operator competence award provided within the Management System folder.

Records of training courses attended by MML employees are retained in the MML main office.