1. MELTHAM LANE CHESTERFIELD S41 7LG APPLICATION FOR ENVIRONMENTAL PERMIT

ENVIRONMENTAL MANAGEMENT SYSTEM

EXECUTIVE SUMMARY

1. PURPOSE AND SCOPE

1.1. P J Fire Ltd has a number of accreditations within the business including ISO9001. In addition, because of the dual nature of the business in, a) recycling of end-of-life fire extinguishers and, b) refurbishment and remanufacture of CO₂ extinguishers the Company holds multiple accreditations including from The British Standards Institute viz;

New equipment supply:

MED 3.38 cert Ref: 755343 (Marine Equipment Directive) MED 3.2 cert Ref: 755737 (Marine Equipment Directive)

CE 2014/68/EU Module B cert Ref: 684663

UKCA 2016/1105 Pressure Equipment (Safety) Regulations Module E cert Ref: 684662

CE 2014/68/EU Module B cert Ref: 749377 CE 2014/68/EU Module E cert Ref: 749378 BSI/UK/3.38/557847 BS EN3 3-7 Module B BSI/UK/3.2/557846 BS EN3 3-7 Module B

BS EN3 Kitemark cert Ref: 523776.

The Company is accredited by BSI for the refurbishment and remanufacture of pressure filled CO_2 fire extinguishers and is subject to 6 weekly compliance inspections. Output from recycling of CO_2 extinguishers in the form of empty, certified, aluminium extinguisher bodies, become the material feedstock to the refurbishment/remanufacture processes on site.

- 1.2. The Company has established an Environmental Management System (EMS), in relation to the waste operations carried out at 1 Meltham Lane Chesterfield S41 7LG (The Site). The EMS is a requirement of Environmental Permitting and complies with standard condition 1.1.1. of any Permit issued in consequence of this application. The EMS has been developed whilst the site has operated under the provisions of RPS 132 (March 2024) which are the same activities as now sought under the Permit, save that the volumes of wastes accepted/ treated, will be increased above the limits of the RPS. The types of wastes accepted and, the methodologies deployed for their treatment, will not however be subject to change. The site has operated historically, without environmental incident/complaint in compliance with the limitations of the RPS 132 and the effectiveness of the EMS has been demonstrated.
- 1.2. The EMS covers operations associated with the storage, handling, transfer and treatment of materials on this Site. The activities conducted, the restricted, effectively singular, waste type accepted, which itself, is highly recognisable, the low volume annual throughput and the total containment of the waste operation within a secure site and modern building, make this

operation of low/medium risk in permitting terms. The complexity of the required EMS therefore reflects that risk. A specific risk assessment has been produced, Document ref; PJF/B2/6/FPR, which does not identify any significant, unmitigated risks

2. Site Introduction

Locati

2.1. The Site is located at the southern end of a small Industrial estate situated on the eastern side of Meltham Lane Chesterfield, approximately 800 metres south-west of Chesterfield Centre. The Site is accessed from Meltham Lane. The Site is enclosed on 3 sides by a 2 metre high, palisade metal fence and on the eastern boundary by mature trees and shrubs with a steep, overgrown, slope to the River Rother beyond, See Site Plan DW04, which shows the layout/infrastructure of the site and waste activities. The Plan forms part of the Fire Prevention Plan and EMS.

Receptors

2.2 The site is situated at National Grid Ref SK 38779 72509 on a small industrial estate, in a heavily urbanised area approximately 1500 metres NNE of Chesterfield Centre.

Key Receptors.

The site is situated at the eastern end of a small industrial estate, bounded to the east by a mature tree line beyond which are the River Rother, which runs north to south and, the Chesterfield Canal which runs parallel to and, approx.' 10metres the east of, the River. To the immediate north and south are other commercial premises and, to the west is the Rother Way trunk road. Chesterfield City Centre is approx.' 1500 metres to the SSW, with a mix of dense Beyond the River and Canal, is a development of residential properties (Tapton Lock Hill), with largely open land beyond. To the West side of Rother Way is dense residential and commercial development in between.

Site operations are conducted in the secure yard area and within a modern steel framed building. End of Waste Products of the fire extinguisher recycling are stored within the dismantling area of the building, in the contained quarantine area in the yard and in secure waste containers in the yard, prior to removal from site.

Site Operations

- 2.2. The Site operates as a non-hazardous waste treatment and transfer facility. It is a bespoke operation in that it handles one principle and very specific waste type, waste, fire extinguishers
- 2.3. The list of waste types to be stored on this Site are detailed in the application.

- 2.4. All waste fire extinguishers and their contents/disassembled component parts are stored and treated within the closed, secure building.
- 2.5. The maximum annual throughput is 25,000 tonnes.

Transfer Waste

2.6. Transfer Waste is disassembled fire extinguishers, their component parts consisting of metals and plastics and ABC powder (the fire suppressant agent used in dry powder extinguishers)

3. Plant and Equipment / Waste Processing Methods

- 3.1. Plant located on this Site for the treatment of waste consists of mobile plant (fork-lift etc) and, hand operated equipment.
- 3.2. A list of the current specific items of plant operated on this site can be found in the maintenance records. All plant and equipment used on Site is subject to maintenance checks in accordance with documented Site Procedure-Maintenance.

Waste Operations

- 3.3. The main waste operation carried out on this Site is the receipt, storage and dismantling of end of life CO₂ filled fire extinguishers. The Company is a specialist recycler of CO₂ units and refurbisher/remanufacturer of CO₂ extinguishers. Controlled degassing of end of life CO₂ units is conducted in the open yard area, no dust releases are involved. The remaining waste activities comprise receipt, storage and transfer of end-of-life water, foam and dry powder fire extinguishers, (no Halon extinguishers are accepted). No dismantling of these units takes place on this site, they are segregated and stored in closed containers and transferred off site to specialist recyclers These operations are spatially separated on the Site and all dismantling of degassed units is conducted exclusively within the building.
- 3.4. The requirements of this EMS apply to the Site and its waste operations in general, therefore cover all waste operations.
- 3.5. Transfer Waste is brought into the Site in Company owned/operated and third-party vehicles, by prior arrangement. Waste pre-acceptance, acceptance and deposit procedures are applied to ensure that only suitable extinguisher types are accepted. Once accepted, loads are deposited into designated storage areas in sealed containers in the yard with intact CO₂ units stored palleted, in a designated yard area and, degassed units stored within the building.
- 3.6. Waste is imported on to the Site for storage, sorting, dismantling (CO₂ only) bulking and transfer out for recycling/recovery. The following treatments are undertaken:

- Hand picking.
- Manual sorting.
- Degassing and dismantling of CO₂ units and direction of recovered, certified, aluminium extinguisher case to manufacturing/refurbishment processes on site.
- Bulking of recyclates.
- Onward transfer of intact, water, dry powder and foam extinguishers.

4. Site Security and Signage

Site Security

- 5.1 The Site is secured outside operational hours and at any time when the Site is unmanned.
- 5.2 There is a combination, 2 metre high, steel palisade fence/mature trees/shrubs and the River provided to the perimeter of the Site., with steel gates, of similar specification to the fencing, to the site entrance.
- 5.4 A CCTV system is provided which can be viewed on Site in the offices and remote access, by site management, is being provided.
- 5.5 The Site security procedure is implemented to ensure that unauthorised entry to the Site is minimised and provides information on the appropriate action in case of a breach of the security.

Site Signage

- 5.6.1 A Site Notice Board will be located near to the Site entrance to include the following information:
 - The permit holder's name (company name).
 - The operator's name if different (company name).
 - An emergency contact name and the operator's telephone number.
 - A statement that the site is permitted by The Environment Agency.
 - The permit number.
 - Environment Agency national number/incident hotline.

6. Staff

Competence

- 6.1 Technical Competence requirements of the Environmental Permits for the waste operations carried out on this Site will be met through the attendance of a suitable qualified manager. Technically competent managers are required to successfully complete the continued competence tests as provided by CIWM/WAMITAB and required by The Environment Agency.
- 6.2 Staff training in relation to the waste operations and this management system is controlled by Site Procedure-Environmental Training, Awareness and Competence.
- 6.3 The Environment Agency will be informed of any changes to the Technically Competent Management for the site and the CIWM/WAMITAB Award Certificate for the new manager will be included in Site Procedures, TCM Schedule.
- 6.4 A technically competent manager will be present on site for the minimum period of time shown in Site Procedures, TCM Schedule, unless otherwise agreed by The Environment Agency.

Roles and Responsibilities

- 6.5 Site Procedures-Staff Organogram describes the staff roles and responsibilities as they apply to The Company and the waste operations carried out at the Site.
- 6.6 In the case of staff absence, Site Procedures, Form-Delegation of Responsibilities will be completed to ensure that all the responsibilities under the Permit are maintained.
- 6.7 Specific responsibilities with regard to the permitted waste operations are detailed within the individual Site procedures.

7 Site Closure

7.1 Should recycling / transfer operations cease to be undertaken on all or part of the site, P J Fire Limited may "close" and/or seek to surrender the Environmental Permit for that part or all of the site.

7.2 Site closure will include:

- The removal of waste such that no wastes, in relation to the Environmental Permit, are left on the site.
- The removal of infrastructure that was installed as required by the Environmental Permit, unless otherwise agreed with regulatory authorities etc.
- Cleaning of any drains, gullies or other surface water management infrastructure.
- The removal of any pollution prevention infrastructure such as dust suppression equipment.
- The removal of all mobile plant and waste containers associated with the permitted operations.
- The emptying and cleaning of all liquid storage containers.
- 7.3 Part 1 of a Site Condition Report can be found in the EMS. The Site Condition Report Part 1 provides, where known, information on the environmental setting, historic uses, evidence of existing contamination and surface / subsurface features of the Site.
- 7.4 Site Procedures, include a template of Part 2 of the Site Condition Report. Records in relation to Part 2 of the Site Condition Report will be created during the life of the Permit and are important for the eventual surrender of the Permit back to The Environment Agency.
- 7.5 At the time of closure of the Site records kept in association with Part 2 of the Site Condition Report will be reviewed to determine if there is a likelihood that pollution of the Site has occurred as a result of the permitted operations. If so, then an intrusive site investigation m be required to characterise this pollution and formulate a remediation strategy.
- 7.6 Pollution of the site caused by the permitted operations will be remediated to the satisfaction of The Environment Agency. Documentation with regard to any identified pollution and subsequent remediation of the site will be required for the surrender application for the Environmental Permit.

8 Identifying and Minimising Risks of Pollution

- 8.1 In an effort to minimise the risk of pollution, identification and assessment of processes, activities and equipment that exist at the Site has been carried out.
- 8.2 The locations of these processes, activities and equipment have been included Site Layout Plans, which forms part of the EMS.
- 8.3 The potential impact of pollution for each aspect of the Site has been considered within an environmental risk assessment, which supports the permit application and the results tabulated as Environmental Impacts, including:
 - Environmental Impacts and Controls.
 - Fire-(Fire Prevention Plan produced to EA spec')
 - Emissions to Air. (controlled degassing of CO₂ units to air only, no risk)
 - · Energy Usage.
 - Emissions to Water. (none)
 - Waste Disposal.
 - Nuisance e.g., Noise, Odour, Dust, Litter, Vermin/Pests. (no risk)
 - Resource Consumption (not energy).
 - Land Contamination.
 - General Waste Management.
 - Substances Stored on Site.

Risk associated with emissions to air, water and land and noise, odour, litter vermin/pests have been assessed as insignificant and not requiring mitigatory management plans. These issues are however, kept under review.

- 8.4 An Environmental Accident Management Plan has been produced in accordance with the requirements of the EMS and a Fire Prevention Plan formulated in accordance with EA guidance.
- 8.5 Operations identified, in the above management plans, as potentially having an impact on the environment are controlled by documented procedures. These procedures are included in the EMS.

9 Environmental Registrations

9.1 None

10. Review

- 10.1 The EMS will subject to regular review, at standard frequency of 2 years and additionally following;
 - Operational incidents-personnel and environmental accidents
 - Complaint
 - Fire on site
 - Trespass/vandalism
 - Intervention by regulatory body.