

MLB AUTOSPARES LTD

**ENVIRONMENT MANAGEMENT
SYSTEM**

**THIS SYSTEM IS THE PROPERTY OF THE COMPANY AND
MUST REMAIN ON SITE AND AVAILABLE FOR
INSPECTION AT ALL TIMES**

INTRODUCTION

This manual is a compilation of the Company's specific Environment Management System. It is intended as an easy access reference library for employees to ensure understanding, knowledge, awareness and full compliance with all the contents.

ENVIRONMENTAL POLICY STATEMENT

Management recognizes the need to protect the environment and regard this as a fundamental principle of the business. We believe that the company has a responsibility to avoid compromising the ability of future generations to sustain their needs.

MLB Autospares Ltd will seek to actively reduce any adverse impact on the environment by the best practicable means. This includes such issues as positive steps to conserve resources; prior assessment of the potential impact of proposed developments; provision of information on the correct use and disposal of our waste; maintenance of the premises to the highest practicable standards and compliance with all Statutory Regulations.

Where possible the company will adopt a best practice recycling programme aiming to focus on redundant materials and packaging from purchased goods.

It is the responsibility of every Employee to observe this policy and the related guidelines and action programmes to protect and preserve the environment.

Important Note

All redundant materials and waste must be removed from site and disposed of correctly. Relevant waste transfer and consignment notes will be obtained and retained on file where applicable.



Permit

The Environmental Permitting (England & Wales) Regulations 2010

MLB Autospares Limited

Kilnhurst Road
Kilnhurst
Rotherham
South Yorkshire
S64 5TL

Permit number
EPR/BB3507XB

Permit

The Environmental Permitting (England and Wales) Regulations 2010

Permit

Permit number
EPR/BB3507XB

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010

MLB Autospares Limited ("the operator"),
whose registered office is

**Kilnhurst Road
Kilnhurst
Mexborough
South Yorkshire
S64 5TL**

company registration number **08175030**

to operate a waste operations described in standard rules **SR2011No3** at

**Kilnhurst Road
Kilnhurst
Rotherham
South Yorkshire
S64 5TL**

to the extent authorised by and subject to the conditions of this permit.

Under regulation 27(2) of the Regulations, standard rules **SR2011No3** are conditions of this permit.

Name	Date
Ian Brindley	11/08/2014

Authorised on behalf of the Environment Agency

Schedule 1 - Site plan

This is the plan referred to in the standard rules SR2011No3



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RISK ASSESSMENT

FOR MLB AUTOSPARES LIMITED

MLB Autospares Ltd is an authorized ATF, vehicle dismantlers and holds all licenses required for its activities.

In our efforts to provide safe environment with minimum risks for employees, member of the public, outside contractors and possible effects to the environment etc, the following observations were made:

Majority of the vehicles stored on our site have been categorised as suitable for legitimate repair in accordance with ABI guidelines. However there are vehicles that have been involved in an accident, burnt or stolen and stripped. They have been collected by an outside recovery firm from the auction sites, where the cars were stored. It is therefore reasonable to assume that all leakages caused by the accident will have already taken place rendering the vehicle a low risk to the environment. This does not affect our safe working practices for the storage and depolluting of vehicles. The yard is fully concreted and banded all round so the risk of any leaks and spillages to leave the site are minimized. All vehicles are stored on suitable ground.

Risk involving De-pollution

MEDIUM

All de-pollution staff are trained in the safe and proper working procedures involved with the de-pollution of vehicles. They are fully aware of actions to be taken if a leakage/spillage occurred ie containment, cleaning and disposal.

The necessary authorities have passed the de-pollution building for its intended purpose. The de-pollution building is fully banded with fireproof sodium lightning, fire extinguishers. Precautions to prevent the risk of a fire starting include separate storage tanks for all fluids removed from vehicles, the use of air and hand tools to cut down the risk of sparks etc. All storage facilities for fluid, batteries etc are checked regularly and are emptied when necessary.

Should a fire start, the building has in addition to extinguishers the ability to be closed down with an external foam injection point enabling the fire to be extinguished safely and quickly.

Risk of spillage/leakage on storage areas

MINIMAL

All dismantling staff are fully aware of the safe and proper working practices regarding the containment, clean up and disposal of any leakage, spillage. All hazardous liquids should be stored on an area with an impermeable surface. All staff have appropriate health and safety training in the transporting and dismantling of vehicles on site with particular emphasis on theirs, the public and environmental safety.

Risk of environmental damage

MINIMAL

The risk of any activities carried out on site have been minimized to the environment due to the precautions listed above. All water on site runs through one of two interceptors, taking out any contaminant before entering local water courses. Should any of the interceptors suffer a blockage the appropriate onsite machinery will be deployed. The interceptors are regularly checked and emptied when necessary.

Hours Of Operations

The site shall only receive waste within the following hours -

Monday to Friday	0800 hours - 1900 hours
Saturday	0800 hours - 1700 hours
Sunday	0900 hours - 1600 hours

Waste treatment shall only take place within the following hours -

Monday to Friday	0800 hours - 1900 hours
Saturday	0800 hours - 1700 hours
Sunday	0900 hours - 1600 hours

Any changes will be reflected in the EMS.

Temporary Cessation of Operations

Any temporary cessation of operations in excess of 14 days shall be notified to Environment Agency in writing.

Environment Agency shall be given at least one day's notice of the Licence Holder's intention to recommence operations after such a temporary cessation.

Permanent Cessation of Operations

Written notice shall be given to Environment Agency of the designated date when the site shall cease operations permanently at least 14 days prior to the said designated date.

Staffing and Management

When the site is open to receive waste the site must be staffed by at least 2 members of staff.

When the site is closed to receive waste, but waste treatment is taking place, the site must be staffed by at least 2 member of staff.

Environment Management System

All operations on site shall be carried out in accordance with the EMS. Where any licence condition conflicts with the EMS, the licence condition shall take precedence over the EMS.

Health & Safety Considerations

When waste motor vehicles are being moved, stacked, loaded or unloaded in any area of the site, that area shall be cordoned off in order to prevent access by members of the public.

Incident Procedures

Environment Agency must be informed forthwith of any incident occurring on site, immediate action shall be taken to deal with the incident. A written report shall be filled in to the site diary of any such incident. This shall include the circumstances of the incident, the identity of any persons responsible or thought to be responsible for the incident and the actions taken by the Licence Holder.

Technical Competence

At least one technically competent person shall be responsible for supervising the site and shall be contactable by site staff and Environment Agency at all times during operational hours.

Any changes to the list of technically competent persons who may be in charge of the site shall be reflected in the EMS within 2 working days.

Site Infrastructure

Internal Site Road

All roads and surfaces shall be constructed and maintained in a condition such that their use is not compromised by debris, ruts, potholes or ponded surface water.

Site Security

The site shall be maintained in a secure condition to prevent unauthorised access.

Notice Board and Signs

A site notice board of durable material and finish shall be displayed at the site entrance. The notice board shall be maintained in a legible condition at all times and shall contain the under-noted information.

- Site name, address and WML number,
- Site Licence Holder's name,
- Site opening times,
- Emergency contact telephone number for the Licence Holder,
- Environment Agency emergency telephone number.

Legible signs of a durable material and finish shall be prominently displayed throughout the site to ensure that users of the site are aware of:

- Traffic routing and access restrictions,
- The location of the various facilities,
- All areas of high risk.

Storage of Fluids

All containers used to store any fluids shall be located in a bund. The minimum capacity of any bund shall be either 110% of the capacity of the largest container, or 25% of the total capacity of all the containers within the bund, whichever is the greater. In the event of any containers being connected to one another, they shall be treated as one container.

The bunded area(s) and containers shall conform to the following standards:

- The walls and base of the bund shall be impermeable,
- The base shall drain to a sump,
- When not in use all taps, valves, pipes and every part of each container shall be located within the area served by the bund,
- vent pipes shall be directed downwards into the bund,
- no part of the bund shall be within 10 metres of a watercourse.

Secure Compound

An area within the site boundary shall be provided for isolating non-conforming wastes. This area shall have an impermeable surface as detailed in the Working Plan, designed to ensure that no fluid fraction can escape beyond this area.

Lighting

No operations relating to this licence shall take place on any part of the site unless adequate lighting is provided and used during the hours of darkness i.e. between sunset and sunrise.

Traffic Control

Waiting areas shall be provided and maintained for vehicles delivering waste to or removing waste from the site as detailed in the EMS in order to prevent vehicles queuing on the public highway and congestion within the site.

Spaces shall be provided for staff and visitor car parking as detailed in the EMS.

Plant Design

Plant utilized for the depollution of vehicles shall be located on impermeable pavement and bunded.

Impermeable Pavement

Areas of impermeable pavement shall be constructed and maintained at the site.

Impermeable pavements shall be constructed of concrete or similar material and be laid to a fall so as to direct pavement water run-off to a sealed drainage system and oil interceptor. The impermeable pavement shall be of such a design that any spillage on it or run-off from it is fully contained and cannot escape onto adjacent ground.

Site drainage shall be provided and maintained to ensure that:

- rainfall run-off from surrounding areas does not drain into the waste
- contaminated surface water run-off does not enter watercourses
- the site does not become subject to ponding or waterlogging.

Segregated Access

Pedestrian access from the car parking area to the site office shall be delineated as detailed in the EMS.

Bays and Bins

Separate facilities shall be provided for the reception of different categories of wastes. These facilities shall be as detailed in the EMS.

WASTE RECEPTION

Reception of Waste Motor Vehicles

All waste motor vehicles received at the site shall immediately be placed on an impermeable pavement constructed to the standard.

On arrival at the site, all waste motor vehicles shall be checked by the Licence Holder for damage or leaks. Any vehicle found to be leaking or at risk of leaking shall be treated as a priority for depollution.

Vehicles shall remain on an impermeable pavement until depolluted.

Inspection of Loads

All waste shall be inspected by the Licence Holder to check that the waste is permitted for acceptance under the conditions of this licence. Any waste found not to conform to the conditions of this licence detected during this inspection shall be refused. Wastes that are accepted and subsequently found not to conform to the conditions of this licence shall be immediately removed to the secure compound, as detailed in the EMS, and arrangements made to remove the waste from the site.

Procedures for Rejected Loads

Where the Licence Holder refuses any person permission to deposit waste at the site the Licence Holder shall take all reasonable steps to obtain the following details: name and address of person, registration number of vehicle, quantity and type of waste, date and time of refusal. These details shall be passed to Environment Agency forthwith.

Labelling

All waste storage areas including parts bins, containers, storage boxes and tanks shall be clearly labelled. The label shall identify the material stored in the area and any hazardous properties. This information shall be legible from out with the storage area.

Adequate Storage Capacity

In the event that the maximum capacity of the storage facilities, as detailed in the EMS, is reached, no further waste shall be accepted at the site until capacity becomes available.

SITE OPERATIONS

Plant and Machinery

All plant, machinery, equipment and instrumentation used at the site shall be operated, maintained and inspected in accordance with the manufacturer's instructions. Should the plant, machinery, equipment or instrumentation for any reason become unserviceable or inoperable, its replacement, repair or arrangements for its repair shall be put in hand forthwith.

Storage of Compatible Wastes

Fluids contained within waste motor vehicles shall separately except in one of the following instances:

- Where fluids are mixed together within the vehicle they may be stored as a mixture.
- Where fluids are classified in the same category within the European Waste Catalogue they may be collected and stored together.

Process Control

Depollution equipment shall be calibrated and maintained as per manufacturers standard.

Breakdowns,Leakages, Spills

Any spillages of waste or fluids shall be cleaned up forthwith. A supply of a suitable absorbent material as detailed in the EMS shall be kept on site to deal with any such spillages.

Tidiness

At the end of the working day the vehicle storage areas shall be free of debris.

Handling and Storage of Waste

Waste Motor Vehicles

All depollution operations shall only take place on an impermeable pavement with sealed drainage.

Depolluted Vehicles

Dismantling of any parts of the engine, transmission or hydraulic systems of depolluted waste motor vehicles shall only take place on an impermeable surface.

Oily Parts

Oily parts must be stored in or on containers on an area of impermeable pavement. Said containers must be designed such that oil cannot escape from them and shall be placed such that rainwater cannot enter them.

Lead Acid Batteries

Lead acid batteries shall be stored in a secure container located on an impermeable bunded storage area whilst awaiting removal from the site. The bunded storage areas shall either be roofed or be kept free of any accumulation of rainwater. Any accumulation of contaminated fluid shall be removed to a suitably licensed facility.

Tyres

Tyres shall only be stored within the dedicated storage bay as detailed in the EMS

Storage of Other Materials

Other solid wastes produced as a result of the licensed activities shall be stored at locations detailed in the EMS.

POLLUTION

Control Dust

The emission of dust to the atmosphere shall be minimized and dust suppression water spraying equipment shall be provided, maintained and used as detailed in the EMS.

Polluting Discharge

In the event of any contaminants from the site entering or threatening to enter controlled water or land out with the site boundary, Environment Agency shall be informed forthwith. Immediate action shall be taken to terminate such a discharge and to take such other remedial action as may be necessary.

Noise

In order to minimise the impact of noise during waste operations, all plant and/or equipment used on site and fitted with noise control measures such as silencers, acoustic panels or enclosures that shall be regularly maintained in accordance with the manufacturer's instructions. Where any defects or disrepair to the said plant and/or equipment cannot be repaired the same day, the said plant and/or equipment shall not be used on site until remedial works are completed.

Mud on Road

The Licence Holder shall ensure that all roads within the site and site surfaces are kept free from mud and other debris to the extent necessary to prevent fouling of the public highway.

Outdoor

Waste operations shall be carried out so that offensive odors from the site, in the opinion of an authorised Environment Agency officer, do not become detectable beyond the boundary of the site.

Litter

All site operations shall be carried out such that no litter escapes beyond the site boundary. On a daily basis any litter lying within the site shall be removed and contained.

Burning

No waste shall be burnt within the boundary of the site

RECORDS

Site Diary

The Licence Holder shall keep on site a diary to record significant events including as a minimum those detailed below:

- Site visits by a technically competent person & any instruction issued to staff regarding compliance with licence conditions
- Plant maintenance
- Incidents and details of remedial action taken. Problems with waste received including actions taken
- Pest control inspections
- Environmental problems specific to the site

The site diary shall be kept in a form that can be audited and shall be made available for inspection at any reasonable time.

Process Analysis

Records shall be kept of all calibration and testing of depollution equipment.

Waste Data Returns

The Licence Holder shall compile the data required to complete "Waste Tonnage Report" every year before 31st of January.

EMS

Step 1

Vehicle Collection and Inspection



All the vehicles are collected by an outside recovery company from the auction sites, public or insurance companies. Each vehicle is given a unique reference number, its details being entered into our computerized stock management system, along with multiple digital images. All vehicles are stored in Incoming Vehicles Storage Area waiting depollution.

Step 2

Vehicle Depollution



Vehicles are moved to special depollution bay when they are brought to site. This bay is concreted, bunded and fitted with interceptor drainage system to eliminate the possibility of ground contamination. First the battery is removed and stored in the plastic containers on impermeable surface. All wheels and tyres are then removed; The tyres are graded for export or recycling.

Then all hazardous liquids are removed including engine oil, gearbox lubricants, fuel, coolant, windscreen wash, and brake and clutch fluids. All the liquids are stored in the tank with secondary containment behind the depollution building. Company trained staff is responsible for completing the de-pollution process.

Step 3

Vehicle Dismantling



After depolluting the parts from each vehicle are removed for export. These parts are tested, labelled and stored on impermeable surface (concrete) waiting to be exported. All cars being entered into our computerized stock management system, along with digital images.

All of the remaining components left on the vehicle are stored depending on their types. Bad engines and gearboxes are stored in a skip for disposal. All waste fluids are stored in the bunded tanks behind the depollution bay awaiting collection for recycling. Non-hazardous parts are left on the car shell and moved to the scrap car baling area awaiting baling and disposal.

Catalytic converters are removed and sent to specialists who recover their precious metal content.

Daily check on cars drained.

Step 4

Vehicle Baling



All the vehicles after depollution are baled and sent to a shredder operator as a scrap metal for recycling. The activity is taking place in the scrap car baling area.

FIRE POINTS/FIRE FIGHTING EQUIPMENT

All employees must be aware of fire assembly points and actions to be taken in the event of a fire. The fire assembly point is located in front of the office building in the car park; Make sure you know where the assembly point is.

All employees must be aware of the position of fire extinguishers/fire fighting equipment and its correct use on the event of a fire.

Fire extinguishers are situated in the following positions:

main office,
depollution building,
outside area in front of the depollution building,
each dismantling building,
car baler.

Instructions on how and which fire type each fire extinguisher should be used are fixed above the extinguishers in the depollution area. If any employee is unsure of the correct use for each extinguisher they must ask!

IN THE EVENT OF A FIRE

On the discovery of a fire employees should:

- assess where possible the severity of the fire.
- notify the office by phone informing of the nature of the fire.
- small easily containable fires should be dealt with using the appropriate fighting equipment.

Any employee should not under any circumstance put their, or others health at risk while fighting the fire.

- if the fire is deemed to be severe the office should be notified, the fire service called and fire alarm activated.
- upon hearing the fire alarm all employees should immediately suspend their work and proceed to the fire assembly point to await further instructions.

At all times employees should observe the company's safe operating procedure regarding fire.

PERSONAL PROTECTIVE EQUIPMENT

- A) Hard hats to be worn when a risk from falling objects is present
- B) Safety boots to be worn at all times when working on site
- C) High visibility vests to be worn at all times when on site
- D) Eye protection to be worn on any cutting or grinding operation
- E) All other PPE to be worn as per risk assessment

The company will supply hard hats, eye protection, gloves and high visibility vests. Safety footwear is the responsibility of the individual employee. It is the employee's responsibility to keep the PPE in good order, in the event of loss or damage the employee will be held responsible for the replacement costs incurred.

MLB Autospares Ltd will in no way be held responsible for injuries incurred due to employees not wearing or using the appropriate PPE.

If an employee deems necessary PPE is not provided for a specific task they must inform the office of their concerns.

MLB Autospares Ltd will take every measure possible to provide a safe working environment for all on site.

GENERAL SITE RULES

All employees to:

- A) Keep their work area and welfare facilities (toilets, canteen etc) clean and tidy at all times
- B) No fires (no fires to be lit anywhere on site)
- C) The drinking of alcohol, or the taking of drugs is not allowed anywhere on site during working hours
- D) All employees have a duty of care to protect themselves and all others inside and outside their workplace
- E) Smoking is only allowed in designated areas (near offices)

ENVIRONMENTAL ISSUES

All employees have a duty of care to minimize the risks of carrying out any action that could have an impact on the environment.

All employees must read and understand the company's safe operating procedure regarding

environmental awareness and the correct procedure for the prevention, containment and cleaning up of any spillage or leakage that may have an impact on the environment.

PAPERWORK

Site Diary, waste transfer notes and all other paperwork will be kept on site in the office.

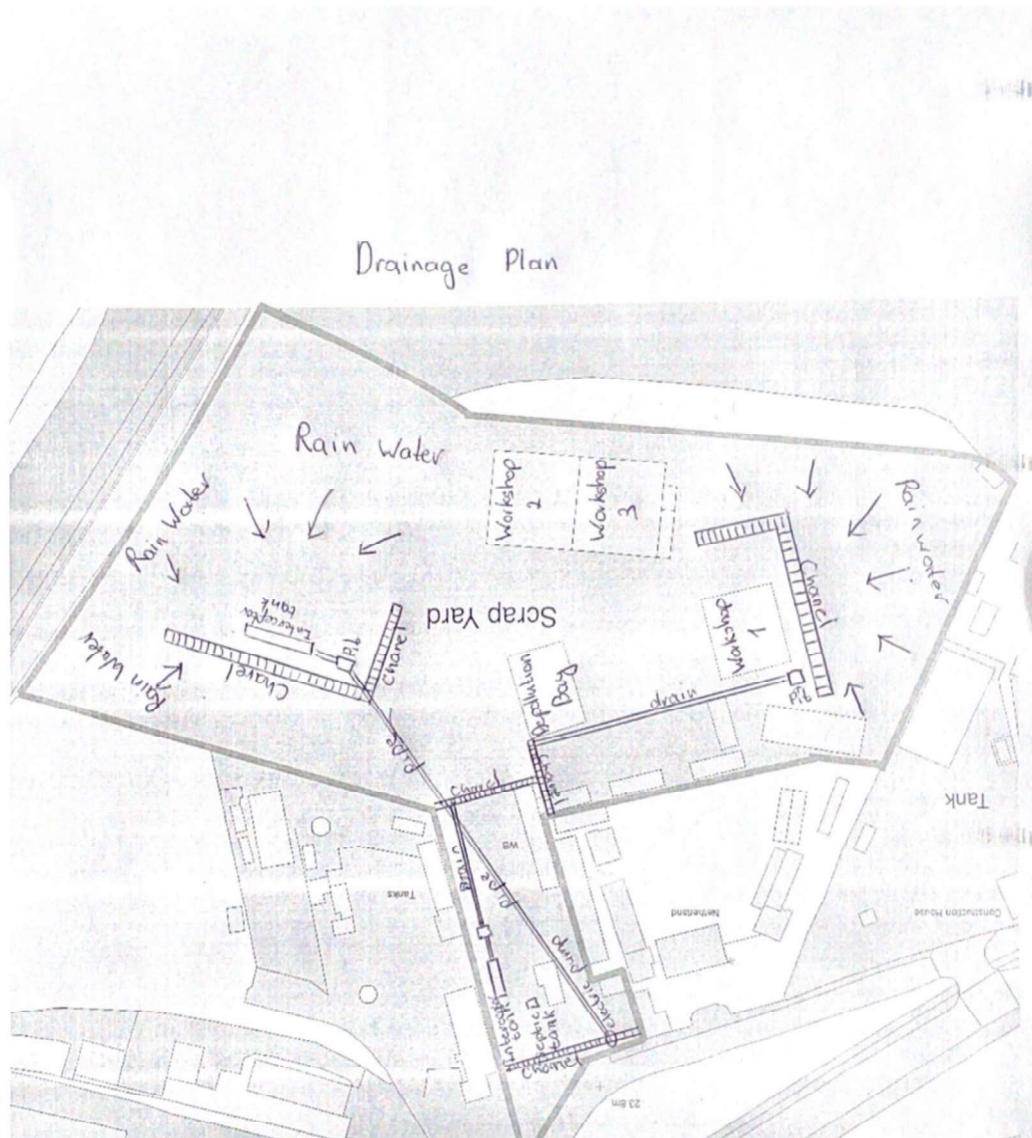
RECEPTORS

There are 2 oil interceptor tanks on site. The oil interceptor located near the site entrance. It is connected to the drainage which goes from the depollution building and whole dismantling area of the site. The oil interceptor tank located in the top of the yard in the recycling area is catching all of the rain water to a channel.

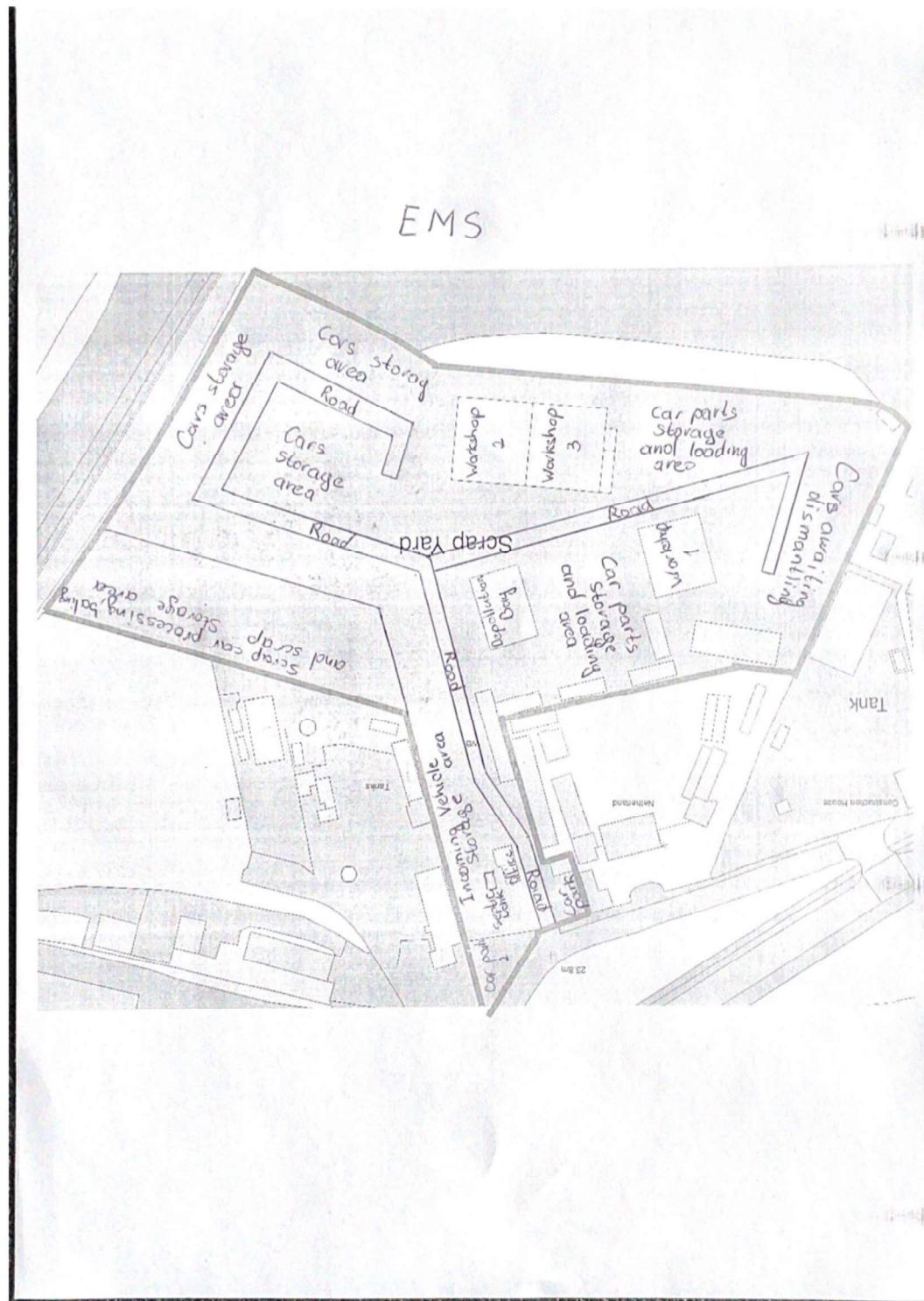
The septic tank is located near the site offices.

The site is not connected to any type of sewer or surface water drain. The nearest watercourse is about 1 mile from the yard.

DRAINAGE PLAN



SITE PLAN



EMERGENCY PLAN

Emergency Plan

