Warrington Office 38 Padgate Lane Padgate Warrington WA1 3RU

Tel: 01925 491011

Lancaster Office 3<sup>rd</sup> Floor, Gordon Manley Building Lancaster Environment Centre Lancaster University Lancaster LA1 4YQ Tel: 01524 510475



# **Environmental Management System**



**Ron Hull JNR Ltd** 

**Grange Mill Metal Recycling Facility** 

**Based on the existing Permit** 

EPR/KB3902KR

**Eric Foster Smith BSc** 

QA number: QA16069e

**Updated by Wardell Armstrong March 2024** 

### **Document log**

Version	Detail of Changes	Date
1 - 3	Original Draft based on EAWML 65522 Revision for SR2008 No.23 (Dec 2011)	27th April 2007
4	Revision of the whole document due to take over by Mettalis Recycling Ltd	10th November 2014
QA16069	EMS revision by Peak Associates Environmental Consultants Limited.	25 <sup>th</sup> August 2016
QA16069a	Addition of metal recycling process block diagram. Section 13 on site drainage. Plan 6 for site drainage.	Drafted 8 <sup>th</sup> November 2016 approved 16 <sup>th</sup> November 2016
QA16069b	Addition of aurthened gas canister policy	
QA16069c		
QA16069d	Change of ownership for 8 Grange Mill Lane from Mettalis to Ron Hull JNR Limited.	19 <sup>th</sup> November 2021
QA16069e	Update to include additional waste codes, Wardell Armstrong	7 <sup>th</sup> March 2024
QA16069f	Update for clarity. Sentence added regarding POPs.	7 <sup>th</sup> August 2024

### Contents

1.	Bac	ckground	1
2.	The	Management System	1
3.	Ger	neral information from the original working plan	2
4.	Env	rironmental Impacts Plan and Controls	3
5.	Per	mitted wastes	12
6.	Des	scriptions of Materials likely to be produced by the site as a result of operations/activities .	29
7.	List	of procedures	30
8.	Con	mpliance with Permit Conditions	32
9.	Ger	neral Considerations	41
g	9.1	Specified waste management operations	41
g	9.2	Processing the metal wastes in the shredder	43
g	9.3	Processing the waste metals via the shear	43
g	9.4	Processing the waste metals via the baler	43
ç	9.5	Stockpiling	44

10. Manag	Staffing and understanding of the requirements of Permit Conditions and the Environmenta system	
11.	Maintenance of Plant	
12.	Accident Management Plan	
12.1	Events that could have a major environmental impact in the event of an accident/incident	
12.2	Likelihood of occurrence	46
12.3	Actions to minimise the consequences of the incidents	46
12.4	Action during an incident	.47
12.5	Emergency Contact Details	49
13.	Site Drainage	50
13.1	Surface water	50
13.2	Wash bay	50
13.3	Trade effluent discharge to sewer	50
13.4	Domestic waste water	50
13.5	Monitoring	51
14. Si	te Security	51
14.1	Perimeter fence and gates	51
14.2	CCTV for Site Security	52
14.3	Security Lighting	52
15.	Complaints Procedure	52
16.	Record Keeping	54
16.1	Security and availability of records	54
16.2	Records of waste movements	
16.3	Site Diary	
16.4	Site Notice Board	55

#### **Appendices**

Annondiv A	Don Hull IND 1+d Cita Diany
Appendix A	Ron Hull JNR Ltd Site Diarv

Appendix B Daily/ weekly inspection action plan

Appendix C Auditing

Appendix D Ron Hull JNR Ltd Waste Management Permit Risk Assessment

Appendix E Pest Management Plan

#### **Plans**

Plan 1 - Site drainage plan for Mettalis Recycling Limited, 8 Grange Mill Lane

Plan 2 ST20716-001 Site Layout

#### 1. Background

The site was purchased from Mettalis Recycling Limited by Ron Hull JNR Limited on the 20<sup>th</sup> of August 2021. The site will become operational under the current Mettalis Permit, as agreed by the EA and all parties concerned.

Ron Hull JNR Limited was formed in 1976 and undertakes waste management on multiple sites across South-Yorkshire. Prior to the take over, Mettalis Recycling Limited (Mettalis) was formed on 28<sup>th</sup> November 2013. The company is involved in the processing and trading of metal waste and is a direct supplier of ferrous and non-ferrous metals to steel mill and foundries throughout the UK.

The site is located on Grange Mill Lane in the Meadowhall Area of Sheffield near junction 34 of the M1 motorway. The post code being S9 1HW, grid reference SK 38055 93189. The site is adjacent to other industrial and waste management operations, with the nearest residential property being 250 m to the west and 150 m to the east (beyond the M1 motorway).

The Waste Management Licence EAWML 65522 was issued by the Environment Agency on the 27th April 2007 to Van Dalen UK Ltd. This would become an environmental permit in April 2008, under the provisions of the Environmental Permitting Regulations 2007. Since then the permit has been varied on a number of occasions and was transferred first to Metallis and then Ron Hull Jnr Ltd, the current operator. The current conditions are those set out in permit EPR/KB3902KR.

#### 2. The Management System

The Management System will consist of components that will:

- Identify Environmental Risks of the operations of metal recycling and trading on site.
- Implement procedures to reduce the foreseeable environmental impacts from waste streams processed on site.
- Continually audit the site activities to ensure environmental impacts are controlled and minimized.
- Annually review the environmental risks (or when a significant change occurs on site).

A variety of sources of information have been used in the formulation of this EMS, including:

- Develop a Management System: Environmental Permits Updated 2021
- Control and Monitor Emissions for your environmental Permit Updated 2021
- How to comply with your environmental permit (Document 433 11 (Version 6), and
- Management Toolkit for business Metal Recycling Site Final Version 2.
- Environment Agency guidance on Fire Prevention Plans July 2016.

This management system shall be reviewed where necessary in response to changes in operations, customer complaints, technical guidance and legal changes and following significant accidents/ incident investigations impacting on the business.

#### 3. General information from the original working plan

The original EMS document was produced by Van Dalen UK Ltd 2<sup>nd</sup> July 2007 as part of the waste management licence application for processing metal waste at the Grange Mill Lane site in Sheffield.

The purpose of the related EAWML issued by the Environment Agency is to define the control mechanisms of how the processing and sorting of metal wastes takes place, predominantly of ferrous and non-ferrous metals from de-polluted end of life vehicles (ELV) and metal wastes derived from industrial and manufacturing sources.

The processed materials are then sold as product to UK and foreign customers for steel mills and foundries.

An accompanying environmental risk assessment (EAWML 65522 RA01) will be appended at the end of this document, and has been formulated using the risk - pathway - receptor format, preferred by the EA, and includes a risk rating (RR = severity x likelihood) and risk management techniques to suitably control the identified risks.

A new risk Amenity and Accident Assessment has been prepared to accompany the permit variation application in March 2024.

# 4. Environmental Impacts Plan and Controls

Table 1 Site Activity: Delivery / Receipt of Materia	ls at <b>Ron Hull JNR Limite</b>	<b>l</b> She	effiel	d.												
List of Key Legislation affecting this sector:- Environmental Protection Act 1990 Environment Act 1995 Environmental Permitting (Eng. & Wales) Regs 2013 Environmental Protection (Duty of Care) Regs 2014 Environmental Information Regs 2004 Clean Neighbourhoods and Environment Act	Clean Air Act 1993 Waste and Emissions Trading Act 2011 Noise Act 1996 Public Health Act 1936 (amended 2016) The Contaminated Land (England) Regs 2006 Water Act 2014 Waste Management Licensing Regs 2011 The End of Life Vehicles Regs 2010 Pollution Prevention and Control Act 2006 Control of Pollution (Oil Storage) (England) Water Resources Act 2007 Groundwater Regulations 2010 Land Drainage Act 2010 Hazardous Waste (Eng. & Wales) Regs 2005 COSHH Regs 2015						nd) R	egs								
2011	Process/ Activity/ Equipment	Α	w	E	D	LC	N	R	Process/ Activity/ Equipment	Α	w	Ε	D	LC	N	R
Processes / Activities / Equipment at the site	Baling			L			L		Sorting	L	L					
(insert H or M or L where this applies as the	Compacting	L	L	М		L	L		Stock Piling	L	L		L	L	L	L
environmental impact)	Crushing	L	L	L			L	L	Others added							
List is all the activities on site	Cutting	L		L			L									
List is all the activities on site	Storage	L	L		L	L	L	L								
Emissions to Air (incl dust) - A	End Disposal		Ш		L	ш										
Emissions to Water - W	Grading	Г	L	L			Г									
Energy Usage (elec, gas etc) - E	Surface Water Drains		ш		L	ш										
Waste Disposal - D	Shredding	Г	L	L			L	L								
Land Contamination - LC	Shear	L		М			L	L								
<ul><li>Nuisance - N</li><li>Resource Consumption (water, etc) R</li></ul>	Burning	L		L			L	L								
Resource consumption (water, etc) <b>R</b>	Screening	L		L			L									
				•							•					

Process / Activity /	Potential Impact	Is impact controlled by equipment?	Is equipment included on	Is impact controlled by procedure?	Has person	Comments
Equipment			maintenance checklist?		using procedure received training?	
Noise emission from process activity	Potential for localised noise issues from processing metals, occasional explosion from cylinders in the fragmenter.	Yes	Yes machinery to be kept in good working order.	Inspection and examination and sorting procedure before processing.	Yes	Events kept in the site diary and acted upon as per policy and procedure. Reports undertaken for explosions.
Odour from waste stored on site	Potential of localised odour coming from waste with residual Foodstuffs or other potentially odorous. material	No Few wastes have such an issue. Site will not accept putrescible waste	Mist blower. Boundary mist spray manifold and pump.	Yes Odour procedure. Waste storage time limited. Odorous waste rejected.	Yes	See Odour Management Plan.
Dust from processing wastes on site	Potential from dust clouds from waste when wind blows across the site.	Yes Site surfacing,bay walls and fencing	Yes Repairs undertaken as required. Site swept as necessary	Yes Dust procedures and inspections.	Yes	Dust control procedure in place. Care taken when loading tilting machines.
Radioactive materials from deliveries of waste metals	Ill health to personnel if waste received with high radiation content.	Yes Radcomm or similar system in place including handheld equipment.	Yes 6 monthly testing by Radcomm. Regs state only 12 monthly needed.	Yes Radiation procedure in place.	Yes	RPA Robin Cotton is employed by the company and contactable for such events. Radiation policy and RPA in place.

Table 2A - Emission	Table 2A - Emissions to Air (A)										
Process / Activity / Equipment	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by procedure?	Has person using procedure received training?	Comments					
Fugitive Fume / smoke from site	Potential localised issue, affecting other businesses.	No	N/A	Yes Inspection of material at source and on site.	Yes	Fire breaks in place. For any stock fire, call the Fire Brigade immediately.					
fire causing nuisance					-	See Fire Prevention Plan.					

Table 2B - Energy Usag	e (E)					
Process / Activity / Equipment	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by procedure?	Has person using procedure received training?	Comments
Electricity usage for large machinery/Shredder processing.	Little direct impact on the environment. Indirect increase in energy demand.	Yes Compliant with The Electricity at Work Regs 1989	Yes	Yes	Yes	Power factor correction facility fitted.
Diesel fuels for plant and machinery	Higher costs if machinery not kept in good order. Fuel spills on site.	Yes	Yes	Yes Refueling procedure	Yes	

Office activities	Low impact for office	Yes	Yes	Yes	Yes	Equipment turned off when
	set up, offices recently					not in use.
	refurbished in 2012.					Recycling of paper, plastic
						and metal.

Process / Activity / Equipment	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by procedure?	Has person using procedure received training?	Comments
Surface water runoff from buildings, car parks and hardstandings	Under normal conditions surface water run off should be uncontaminated (e.g. hydrocarbons). However, if contamination occurs, it has the potential to cause water pollution to Yorkshire Water Sewer and the local watercourse if the pump fails or in a flood event.	Yes Separator / interceptor operation Drainage to foul sewer with emergency shut off	Yes	Yes Inspection and reporting should issue occur	Yes	Contaminated areas are now isolated and if contaminated runoff being tankered to licensed facility.
Groundwater/Blackburn brook pollution	Environmental impact should this be contaminated, flooding from brook into site.	No	N/A	Yes Site cleanliness reporting system	Yes	Site surface water is contained in drainage trench and isolated interceptors. Contact EA if flooding occurs. QA21020 Water Discharge Policy in place for site.
Fluids spills from ELV's	Pollution of watercourse if emission into drainage system run off site.	Yes Interceptors	Yes	Yes Spill procedure	Yes	Vehicles to be depolluted on impermeable surfacing. Suitable bunded containers

Table 2C - Emissions to	Water (W)					
Process / Activity / Equipment	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by procedure?	Has person using procedure received training?	Comments
						provided for storage of fluids.Surface water is contained on site and pumped to foul sewer.
Maintenance of plant and equipment	Pollution to Yorkshire water sewer if emissions go into the drainage system. Specific area allowed for this task.	No	N/A	Yes Maintenance procedures	Yes	Planned Preventative Maintenance systems in place.
Storage of waste batteries	Pollution of watercourse if spills.	Yes	Yes	Yes	Yes	Waste batteries stored in suitable sealed bins. Site surface water contained.

Process / Activity / Equipment	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by procedure?	Has person using procedure received training?	Comments
Hazardous waste from activity	Spills of fluids may have impact on watercourse.	Yes, suitable containers and bunding where appropriate	Yes	Yes Procedures in place for waste tracking and appropriate storage	Yes	All hazardous waste stored on impermeable surface.
(stacking ELV's and fluids emitted from These or from hazardous WEEE).	•	Impermeable Surfacing	Yes	Interceptors fitted in drainage system. Procedures to clean spills	Yes	Inspection and reporting system in place. Spill kits in place. Site surface water contained (see QA21020 Water Discharge Policy for Mettalis).
General unsorted wastes	Wastes for transfer to be assessed and sent for recycling, energy recovery or landfill associated impacts; e.g. ecotoxicity, global warming, nuisance such as odour.	No	N/A	Yes Comply with duty of care requirements Follow waste hierarchy and Send waste to Permitted site	Yes	by additional processing shredder waste may be used as waste for energy to reduce landfill

Hazardous waste from interceptors, grit and oils.	Potential for water pollution if interceptors and silt traps not operating correctly	Yes	Yes	Yes Interceptors etc inspected	Yes	Materials retained on site until removed by contractor Items removed
Waste oils from machinery.				regularly and maintained and emptied as required		under consignment note (Hazardous Waste if necessary). Site is a contained surface water system.
Waste from shredder processing 19 10 04 and 19 10 06	Landfill or disposal. Refuse derived fuels.	Yes	Yes	Yes	Yes	See above.

Process / Activity / Equipment	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by procedure?	Has person using procedure received training?	Comments
Noise from the site activities (use of crane to move waste)	Section III of the Environmental Protection Act 1990, noise can be classified as a statutory nuisance	Yes	Yes	Yes Hours of work Complaints procedure	Yes	Low impact as nearest residents 250 m away and neighbours /M1 motorway make similar noise levels. Compliant with EU Directive for Db(A) levels
Odour from site activities (type of waste containing foodstuffs)	Section III of the Environmental Protection Act 1990, odour can be classified as a statutory nuisance	Yes	Yes	Yes Quick turnaround of materials.	Yes	Eco Pro recommended Mistblower used to reduce odours on site.
Flies generated from waste containing residual foodstuffs	Section III of the Environmental Protection Act 1990, fly infestation probably	Yes	Yes	Yes	Yes	Mobile Mistblower with insecticide used to mitigate flies on site. Six fly traps fitted to northwest boundary to

	can be classified as a statutory nuisance					intercept flies. No fly migration indicated by fly traps. See Appendix F Pest and Odour Management Plan. Insecticide in surface water contained on site.
Noise from explosions from shredder processing	Impact on local business and residents (residential property nearest within 250 m)	Yes	Yes	Yes Checking of materials before processing.	Yes	Inspection before processing and incident reporting system.

Table 2F - Resource	Table 2F - Resource Consumption (i.e. Not Energy) (R)							
Process / Activity / Equipment	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by procedure?	Has person using procedure received training?	Comments		
Use of chemicals for an activity (Fuels/ Oils for cranes)	Harm to human health or escape to environment. Management of the hazardous substance according to COSHH and Hazardous Waste Regulations	Yes Maintained equipment may use less fuel	Yes	Yes Spill procedure Liquids in appropriate container with drip tray or bund	Yes	Inspection and reporting of incidents to reduce impact. Site surface water is contained.		
Use of Water	Inefficient use results in natural resource depletion	No	N/A	Yes Dust and fly control .water to be used only as needed	Yes	Contaminated runoff surface water is contained on site.		

Table 2G - Land Co	ontamination (e.g. storage of h	azardous substa	nces) (L)			
Process / Activity / Equipment	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by procedure?	Has person using procedure received training?	Comments
Storage of a hazardous substances (Diesel / lead acid batteries)	Substances can cause harm to the ecotoxicity of the soil and could leak into the groundwater.	Yes	Yes Bunded tank. Batteries stored in sealed containers Site is concreted.	Yes Refuelling procedure. MSDS and COSHH assessments.	Yes	Inspection and maintenance of storage tank. Prevention of tank being driven into and damaged. Inspection procedures compliant with regulations. Lead acid batteries in suitable container. Bunded containers to store fluids from depolluted vehicles etc.
Contaminated materials	Environmental impact and damage to wild life.	Impermeable surfacing and sealed drainage	Yes	Yes Spill procedure and waste processing.	Yes	The site has an impermeable surface.
Non permitted wastes	Environmental impact and damage to wild life.	No	N/A	Yes And through the permit	Yes	Non-Permitted wastes rejected and recorded in site diary.
Spills of oil and other fluids from ELV's	Substances can cause harm to the ecotoxicity of the soil and could leak into the groundwater.	Impermeable surfacing and sealed drainage	Yes	Yes Several procedures cover this aspect.	Yes	Inspection and reporting procedures in place

#### **5 Permitted Wastes**

Table 3, below sets out the fate of materials currently accepted on site. In the majority of cases materials are sold to customers for use as a raw material going back into metal products.

Table 3 - General Waste Management					
Waste Accepted at Site (EWC if known)	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?	Comments
02 Wastes from agricultural, horticulture, aquaculture, forestry, hunting and fishing					
02 01 Wastes from agricultural, horticulture, aquaculture, forestry, hunting and fishing					
02 01 10 Metal waste	Sold to customer	Yes	Yes	Yes	
10 Wastes from thermal processes					
10 02 Wastes from the iron and steel industry					
10 02 01 Wastes from processing slag	Sold to customer	Yes	Yes	Yes	
10 02 02 Unprocessed slag	Sold to customer	Yes	Yes	Yes	
10 02 10	Sold to customer	Yes	Yes	Yes	
Mill scales					
10 05 Wastes from zinc thermal metallurgy					
10 05 01 Slags from primary and secondary production	Sold to customer	Yes	Yes	Yes	
10 09 Wastes from casting of ferrous pieces					
10 09 03 Furnace slag	Sold to customer	Yes	Yes	Yes	

10 10 Wastes from casting of non-					
ferrous pieces					
10 10 03	Sold to customer	Yes	Yes	Yes	
Furnace slag	Solu to editorner	163	163	163	
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	Sold to customer	Yes	Yes	Yes	
Ferrous metal filings and turnings					
12 01 03	Sold to customer	Yes	Yes	Yes	
Non-ferrous metal filings and turnings					
12 01 13	Sold to customer	Yes	Yes	Yes	
Welding wastes					
15 Waste packaging, absorbents,					
wiping cloths, filter materials and PPE					
15 01 Packaging (including separately					
collected municipal packaging waste)					
15 01 04	Sold to customer	Yes	Yes	Yes	
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	Sold to customer	Yes	Yes	Yes	
16 01 18 non-ferrous metal	Sold to customer	Yes	Yes	Yes	
16 01 22 components not otherwise	Recycled where possible	Yes	Yes	Yes	
specified					

16 02 wastes from electrical and electronic equipment					
16 02 14 discarded equipment other than those mentioned in 16 02 09 to 16 02 13	Sold to customer	Yes	Yes	Yes	
16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15	Sold to customer	Yes	Yes	Yes	
16 06 Batteries and accumulators					
16 06 01 Lead batteries	Sold to customer	Yes	Yes	Yes	Hazardous waste
17 Construction and Demolition wastes					
17 04 Metals (including their alloys)					
17 04 01 Copper, bronze, brass	Sold to customer	Yes	Yes	Yes	
17 04 02 Aluminium	Sold to customer	Yes	Yes	Yes	
17 04 03 Lead	Sold to customer	Yes	Yes	Yes	
17 04 04 Zinc	Sold to customer	Yes	Yes	Yes	
17 04 05 Iron and steel	Sold to customer	Yes	Yes	Yes	
17 04 06 Tin	Sold to customer	Yes	Yes	Yes	
17 04 07 Mixed metals	Sold to customer	Yes	Yes	Yes	
17 04 11 Cables other than those mentioned in 17 04 10	Sold to customer	Yes	Yes	Yes	
19 Wastes from waste management facilities (shredded materials)					
19 01 Wastes from incineration or pyrolysis of waste					

19 01 02	Sold to customer	Yes	Yes	Yes	
Ferrous materials removed from	Solu to custoffier	163	163	163	
bottom ash					
19 10 Wastes from shredding of metal					
containing wastes					
19 10 01	Sold to customer	Yes	Yes	Yes	
Iron and steel waste	Joid to custoffier	163	163	163	
19 10 02	Sold to customer	Yes	Yes	Yes	
Non-ferrous waste	Joid to custoffier	163	ies	163	
19 12 Wastes from the mechanical					
treatment of waste (for example					
sorting, crushing, compacting,					
pelletising) not otherwise specified					
19 12 02	Sold to customer	Yes	Yes	Yes	
Ferrous metals, including well sorted	Solu to custoffier	163	165	163	
MRF "can" waste.					
19 12 03	Sold to customer	Yes	Yes	Yes	
Nonferrous metals	Solu to custoffier	165	165	162	
19 12 04 plastic					
·					
19 12 04 rubber					_
19 12 12 Poorly sorted MRF 'can'	sold to customer	Yes	Yes	Yes	As approved
					through permit
					variation
					application
					November 2016.
20 Municipal wastes (Household and					
commercial)					
20 01 Separately collected fractions					
(except 15 01)					
20 01 23 discarded equipment					
containing chlorofluorocarbons					
20 01 36					
Discarded electrical and electronic					
equipment other than those					
mentioned in 20-01-21, 23, 35					

20 01 35 discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components					
20 01 40 Metals	Sold to customer	Yes	Yes	Yes	
20 03 07 bulky waste		yes	Yes		To be accepted where metal or mainly metal for recycling with other materials on site.

Table 4, below lists the wastes introduced as a result of the permit variation. The vast majority of these wastes are suitable for recycling and will be sent on for recycling. Before any new waste stream is accepted an assessment must be made to confirm that there is an appropriate off taker. Wherever possible materials must be sent for reuse or recycling. If recycling is not possible at the current time the potential for energy recovery should be assessed before sending to landfill.

The off-takers will be reviewed at least once every four years to determine whether any more environmental options have become available.

**Table 4, New Permitted wastes** 

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
01	Wastes resulting from exploration, mining, quarrying and physical and chemical treatment of minerals				
01 01	Wastes from mineral excavation				
01 01 01	Wastes from mineral metalliferous excavation	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
01 01 02	Wastes from mineral non-metalliferous excavation	Into construction industry via recycling site	Yes	Imperemeable pavement	Yes
01 03	Wastes from physical and chemical processing of metalliferous minerals				

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
01 03 06	Tailings other than those mentioned in 0103 04 and 01 03 05	Recycled where possible or landfill	To be confirmed	Impermeable pavement	Yes
01 04	Wastes from physical and chemical processing of non-metalliferous minerals				
01 04 08	Waste gravel and crushed rocks other than those in 01 03 07	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
01 04 09	Waste sands and clay	Into construction industry via recycling site	Yes	Imperemeable pavement	Yes
01 04 11	wastes from potash and rock salt processing other than those mentioned in 01 04 07	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
01 04 12	tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11	Recycled where possible or landfill	To be confirmed	Impermeable pavement	Yes
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 04	Waste plastic (except packaging)	Recycling site	Yes	Impermeable pavement in bay	Yes
02 01 07	Waste from forestry	Recycling site/ energy recovery	Yes	Impermeable pavement in bay	Yes
02 04	Wastes from sugar processing				
02 04 01	Soil from cleaning and washing beet	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
02 04 02	Off specification calcium carbonate	Specialist recycling where possible or landfill	To be confirmed	Impermeable pavement	Yes

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
03	Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard				
03 01	Wastes from wood processing and the production of panels and furniture				
03 01 01	Waste bark and cork	Recycling or energy recovery	Yes	Impermeable pavement in bay	Yes
03 03	Wastes from pulp, paper and cardboard production and processing				
03 03 01	Waste bark and wood	Recycling or energy recovery	Yes	Impermeable pavement in bay	Yes
03 03 07	mechanically separated rejects from pulping of waste paper and cardboard	Sent for sorting and recycling if possible or energy recovery or landfill	To be confirmed	Skip	Yes
03 03 08	wastes from sorting of paper and cardboard destined for recycling	Recycling or energy recovery	Yes	Impermeable pavement in bay	Yes
04	Wastes from the leather fur and textile industries				
04 02	Wastes from the textile industry				
04 02 09	wastes from composite materials (impregnated textile, elastomer, plastomer)	Recycling or energy recovery	Yes	Impermeable pavement in bay	Yes
04 02 21	Wastes from unprocessed textile fibres	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
04 02 22	Wastes from processed textile fibres	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
07	Wastes from organic chemical processes				
07 02	Wastes from the MFSU of plastics, synthetic rubber and manmade fibres				
07 02 13	Waste plastic	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
07 02 17	wastes containing silicones other than those mentioned in 07 02 16	Recycled if possible or energy recovery	To be confirmed	Impermeable pavement in bay	Yes
10	Wastes from thermal processes				
10 02	Wastes from the iron and steel industry				

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
10 02 01	Wastes from the processing of slag	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
10 02 02	Un processed slag	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
10 02 08	solid wastes from gas treatment other than those mentioned in 10 02 07	Recycled if possible or landfill	To be confirmed	Impermeable pavement in bay	Yes
10 02 12	wastes from cooling-water treatment other than those mentioned in 10 02 11	Landfill	No	Impermeable pavement in bay	Yes
10 02 14	sludges and filter cakes from gas treatment other than those mentioned in 10 02 13 (filter cake only)	Landfill	No	Impermeable pavement in bay	Yes
10 02 15	other sludges and filter cakes (filter cake only)	Landfill	No	Impermeable pavement in bay	Yes
10 03	Wastes from aluminium thermal metallurgy				
10 03 02	Anode scraps	Sent to recycling site	Yes	Impermeable surface	Yes
10 03 05	Waste alumina	Sent to recycling site	Yes	Impermeable surface	Yes
10 03 16	skimmings other than those mentioned in 10 03 15	Recycled where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 06	Wastes from copper thermal metallurgy				
10 06 01	slags from primary and secondary production	Specialist recycling where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 06 02	dross and skimmings from primary and secondary production	Specialist recycling where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 06 10	wastes from cooling-water treatment other than those mentioned in 10 06 09	Landfill	No	Impermeable surface in bay	Yes
10 07	Wastes from silver gold and platinum thermal metallurgy				
10 07 01	slags from primary and secondary production	Specialist recycling where possible	To be confirmed	Impermeable pavement in bay	Yes
10 07 02	dross and skimmings from primary and secondary production	Specialist recycling where possible	To be confirmed	Impermeable pavement in bay	Yes
10 07 03	solid wastes from gas treatment	Landfill	No	Impermeable surface in bay	Yes

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
10 07 05	sludges and filter cakes from gas treatment (filter cake only)	Landfill	No	Impermeable surface in bay	Yes
10 07 08	wastes from cooling-water treatment other than those mentioned in 10 07 07	Landfill	No	Impermeable surface in bay	Yes
10 08	Wastes from other non-ferrous thermal metallurgy				
10 08 11	dross and skimmings other than those mentioned in 10 08 10	Specialist recycling where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 08 13	carbon-containing wastes from anode manufacture other than those mentioned in 10 08 12	Specialist recycling where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 08 14	Anode scrap	Sent to recycling site	Yes	Impermeable surface in bay	Yes
10 08 18	sludges and filter cakes from flue-gas treatment other than those mentioned in 10 08 17 (filter cake only)	Landfill	No	Impermeable surface in bay	Yes
10 08 20	wastes from cooling-water treatment other than those mentioned in 10 08 19	Landfill	No	Impermeable surface in bay	Yes
10 09	Waste from casting ferrous pieces				
10 09 06	casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05	Landfill	No	Impermeable surface in bay	Yes
10 09 08	casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07	Landfill	No	Impermeable surface in bay	Yes
10 10	Wastes from casting non-ferrous pieces				
10 10 06	casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05	Landfill	No	Impermeable surface in bay	Yes
10 10 08	casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07	Landfill	No	Impermeable surface in bay	Yes
10 11	Wastes from manufacture of glass and glass products				

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
10 11 12	waste glass other than those mentioned in 10 11 11	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
10 12	Wastes from manufacture of ceramic goods, brick, tiles and construction products				
10 12 01	waste preparation mixture before thermal processing	Recycled where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 12 06	discarded moulds	Recycled where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
10 13	Wastes from the manufacture of cement, lime and plaster and articles and products made from them				
10 13 01	waste preparation mixture before thermal processing	Recycled where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 13 10	wastes from asbestos-cement manufacture other than those mentioned in 10 13 09	Recycled where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 13 11	wastes from cement-based composite materials other than those mentioned in 10 13 09 and 10 13 10	Recycled where possible or landfill	To be confirmed	Impermeable pavement	Yes
10 13 14	waste concrete and concrete sludge	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
11	Wastes from chemical surface treatment and coating of metals and other materials; non-ferrous hydrometallurgy				
11 02	Wastes from non-ferrous hydrometallurgical processes				
11 02 03	wastes from the production of anodes for aqueous electrolytical processes	Specialist recycling where possible or landfill	To be confirmed	Impermeable pavement	Yes
11 05	Waste from hot galvanising processes				

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
11 05 01	Hard zinc	Sent to recycling site	Yes	Impermeable pavement	Yes
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 21	spent grinding bodies and grinding materials other than those mentioned in 12 01 20	Landfill	No	Impermeable surface in bay	Yes
15	Waste packaging, absorbents, wiping cloths, filter materials, and protective clothing not otherwise specified				
15 01	Packaging (including separately collected municipal packaging waste)				
15 01 02	Plastic packaging	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
15 01 03	wooden packaging	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
15 01 05	Composite packaging	Sent to recycling site if possible or energy recovery	Yes	Impermeable pavement in bay	Yes
15 01 07	Glass packaging	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
15 01 10*	packaging containing residues of or contaminated by hazardous substances	Sent to recycling site if possible or energy recovery	Yes	In container on impermeable pavement	Yes
15 02	Absorbents filter materials, wiping cloths and protective clothing				
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances	Energy recovery	Yes	In container on impermeable pavement	Yes

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02	Energy recovery	Yes	In container on impermeable pavement	Yes
16	Wastes not oth0erwise 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 03	End-of-life tyres	Sent to recycling site	Yes	Impermeable pavement in bay	Yes
16 01 04*	End-of-life vehicles	Dismantled and sent to recycling site	Yes	Impermeable pavement in bay	Yes
16 01 06	end-of-life vehicles, containing neither liquids nor other hazardous components	Dismantled and sent to recycling site	Yes	Impermeable pavement in bay	Yes
16 01 07*	Oil filters	Dismantled and sent to recycling site	Yes	In container on impermeable pavement	Yes
16 01 08*	Components containing mercury	Specialist recycling	Yes	Container on Impermeable pavement	Yes
16 01 09*	Components containing PCBs	Energy recovery	No PCB to be destroyed	Container on Impermeable pavement	Yes
16 01 12	brake pads other than those mentioned in 16 01 11	Recycled where possible	To be confirmed	Container on Impermeable pavement	Yes
16 01 13*	Brake fluids	Sent to recycling site	Yes	Bunded container	Yes
16 01 14*	antifreeze fluids containing hazardous substances	Sent to recycling site	Yes	Bunded container	Yes
16 01 15	antifreeze fluids other than those mentioned in 16 01 14	Sent to recycling site	Yes	Bunded container	Yes
16 01 16	tanks for liquefied gas	Sent to recycling site	Yes	Bay with impermeable pavement	Yes

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
16 01 19	plastic	Sent to recycling site	Yes	Bunded container Bay with impermeable pavement	Yes
16 01 20	glass	Sent to recycling site	Yes	Bay with impermeable pavement	Yes
16 01 21*	hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14 (catalytic convertors)	Specialist recycling or energy recovery	Yes	Container on Impermeable pavement	Yes
16 02	Wastes from electrical and electronic equipment				
16 02 10*	discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09	Specialist recycling to manage PCB correctly or Energy recovery	Where possible note PCB to be destroyed	Container on Impermeable pavement	Yes
16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC	Recycled	Yes	Container on Impermeable pavement	Yes
16 02 12*	discarded equipment containing free asbestos	Landfill	No	Enclosed container	Yes
!6 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	Recycled where possible	To be confirmed	Container on Impermeable pavement	Yes
16 02 15*	hazardous components removed from discarded equipment	Recycled where possible	To be confirmed	Container on Impermeable pavement	Yes
16 05	Gases in pressure containers and discarded chemicals				
16 05 04*	gases in pressure containers (including halons) containing hazardous substances	recycling	Yes	Gas bottle cage	Yes
16 05 05	gases in pressure containers other than those mentioned in 16 05 04	recycling	Yes	Gas bottle cage	Yes
16 06	Batteries and accumulators				
16 06 02*	Ni Cd batteries	Recycling	Yes	Enclosed container on impermeable surface	Yes
16 06 04	Alkaline batteries except 16 06 03	Recycling	Yes	Enclosed container on impermeable surface	Yes

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
16 06 06	separately collected electrolyte from batteries and accumulators	Recycling	Yes	Enclosed container on impermeable surface	Yes
16 08	Spent catalysts				
16 08 01	spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)	Recycling	Yes	Container on Impermeable pavement	Yes
16 11	Wastes linings and refractories				
16 11 02	carbon-based linings and refractories from metallurgical processes other than those mentioned in 16 11 01	Sent to recycling site	Yes	Bay with impermeable pavement	Yes
16 11 04	other linings and refractories from metallurgical processes other than those mentioned in 16 11 03	Sent to recycling site	Yes	Bay with impermeable pavement	Yes
16 11 06	linings and refractories from non- metallurgical processes other than those mentioned in 16 11 05	Sent to recycling site	Yes	Bay with impermeable pavement	Yes
17	Construction and demolition wastes (including excavated soil from contaminated sites)				
17 01	Concrete, brick, tiles and ceramics				
17 01 01	concrete	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
17 01 02	Brick	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
17 01 03	Tiles and ceramics	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
17 02	Wood glass and plastic				
17 02 01	Wood	Sent to recycling site	Yes	Bay with impermeable pavement	Yes

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
17 02 02	Glass	Sent to recycling site	Yes	Bay with impermeable pavement	Yes
17 02 03	plastic	Sent to recycling site	Yes	Bay with impermeable pavement	Yes
17 03	bituminous mixtures, coal tar and tarred products				
17 03	bituminous mixtures other than those mentioned in 17 03 01	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
17 04	Metals (including their alloys)				
17 04 09*	metal waste contaminated with hazardous substances	Recycled	Yes	Container on Impermeable pavement	Yes
17 04 10	cables containing oil, coal tar and other hazardous substances	Recycled	Yes	Container on Impermeable pavement	Yes
17 08	Gypsum based construction material				
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
17 09	Other construction and demolition waste				
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Into construction industry via recycling site	Yes	Impermeable pavement	Yes
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 of waste				
19 01 12	bottom ash and slag other than those mentioned in 19 01 11	Into construction industry via recycling site or landfilled	Yes	Impermeable pavement	Yes

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
19 01 16	boiler dust other than those mentioned in 19 01 15	Landfill	No	Bay with impermeable pavement	Yes
19 01 18	pyrolysis wastes other than those mentioned in 19 01 17	Into construction industry via recycling site or landfilled	Yes	Impermeable pavement	Yes
19 01 19	Sands from fluidised beds	Recycled where possible or landfilled	To be confirmed	Bay on Impermeable pavement	Yes
19 04	Vitrified waste and wastes from vitrification				
19 04 01	Vitrified waste	Recycled where possible or landfilled	To be confirmed	Bay on Impermeable pavement	Yes
19 05	Wastes from aerobic treatment of solid wastes				
19 05 03	off-specification compost	Landfill	No	Bay on impermeable pavement	Yes
19 10	Wastes from shredding of metal containing waste				
19 10 03*	fluff-light fraction and dust containing hazardous substances	Energy recovery or landfill	No	Bay on impermeable pavement	Yes
19 10 04	fluff-light fraction and dust other than those mentioned in 19 10 03	Energy recovery or landfill	No	Bay on impermeable pavement	Yes
19 10 06	other fractions other than those mentioned in 19 10 05	Recycled if possible or landfilled	To be confirmed	Bay on impermeable pavement	Yes
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified				
19 12 05	glass	Sent to recycling site	Yes	Bay with impermeable pavement	Yes
19 12 07	Wood other than that mentioned in 19 12 06	Sent to recycling site	Yes	Bay with impermeable pavement	Yes
19 12 08	textiles	Sent to recycling site	Yes	Bay with impermeable pavement	Yes
19 12 09	Minerals (for example sand, stones)	Sent to recycling site	Yes	Bay with impermeable pavement	Yes

Waste Code	Description of the waste	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?
19 13	Wastes from soil and groundwater remediation				
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01	Recycled if possible or landfilled	To be confirmed	Bay on impermeable pavement	Yes
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*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	Sent to recycling site	Yes	Covered container on impermeable pavement	Yes
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	Sent to recycling site	Yes	Covered container on impermeable pavement	Yes
20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	Sent to recycling site	Yes	Covered container on impermeable pavement	Yes
20 01 38	Wood other than that mentioned in 20 01 37	Sent to recycling site	Yes	Bay on impermeable pavement	Yes
20 02	Garden and park waste (including cemetery waste)				
20 02 01	Biodegradable waste	Sent to recycling site (eg composting)	Yes	Bay on impermeable pavement	Yes
20 02 02	Soil and stones	Sent to recycling site	Yes	Bay on impermeable pavement	Yes
20 02 03	Other non-biodegradable waste	Recycled if possible or landfilled	To be confirmed	Bay on impermeable pavement	Yes
20 03	Other municipal waste				
20 03 03	Street cleaning residues	Landfill	No	Bay on impermeable pavement	Yes
20 03 07	bulky waste	Sent to recycling site	Yes	Bay on impermeable pavement	Yes

# 6. Descriptions of Materials likely to be produced by the site as a result of operations/activities

Waste Produced at Site (EWC if known)	Where does the waste go?	Can it go to recovery or recycling?	Is it being correctly stored on site?	Are Duty of Care requirements being met?	Comments
19 10 01	Recycling/reclamation	Yes	Yes	Yes	
19 10 02	Recycling/reclamation	Yes	Yes	Yes	
19 10 04	Landfill/RDF	Part of	Yes	Yes	
19 10 06	Landfill/RDF	Part of	Yes	Yes	
19 12 02	Recycling/reclamation	Yes	Yes	Yes	
19 12 03	Recycling/reclamation	Yes	Yes	Yes	
19 12 05	Recycling/reclamation	Yes	Yes	Yes	
19 12 07	Recycling/reclamation	Yes	Yes	Yes	
19 12 12	Landfill/RDF	Part of	Yes	Yes	

# 7. List of procedures

Document Number	What process / activity or equipment does it relate to?	Where is the procedure kept?	When was the procedure last reviewed?	Comments
Section 5	Received wastes onto site (see Table 3 of this document).	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Spillage Control	Action to remedy spillages on site.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	Site has a contained surface water system.
QA16073e	Fire Prevention Plan.	Weighbridge office / reception	Nov 2021	
QA16072a	Odour Management Plan.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Section 16	Administration and records kept for site.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Litter and Mud	Control of any litter or mud issues on site.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Maintenance of Plant and Equipment	Actions to ensure plant and equipment is kept in good order.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Section 16	Daily diary.	Weighbridge office / reception	Nov 2021	
Section 14	Walls and Fencing, CCTV.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Section 16.4	Site Notice Board.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Radiation	Inspection of wastes received for radiation, RPA appointed for advice and contact for events.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Section 15	Actions required dealing with complaints from the customers or neighbours or public.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Appendix E	Pest Management Plan.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	
Auditing	Auditing requirements by the Company.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer	

Section 12	How the site deals with accidents and incidents on site and actions required to remedy these.	Weighbridge office / reception	TBC in 2022 upon Permit Transfer
QA16097	Water Discharge Policy.	Reception	TBC in 2022 upon Permit Transfer

# 8. Compliance with Permit Conditions

Permit Condition	Description	System Documentation	
1	Management		
1.1	General Management		
1.1.1	The activities shall be managed and operated:		
a) system which identifies and minimises risk of pollution, from operations, maintenance, accident / incidents, nonconformances and complaints.		The information is kept on the ISO Manual folder on the company server; each aspect being identified as a master document to be used by the individual site managers and personnel.	
b) by sufficient persons who are competent in respect of responsibilities with operations		A training matrix is held by each site which references their knowledge, the ISO Manual folder references job descriptions under item 4.	
1.1.2	Records demonstrating compliance with above.	Site Manager will maintain the sites records with a master copy with the QHSE Manager on the company server under the sites name.  The ISO Manual folder will contain the systems to be followed by site.  The H&S folder information from each of Ron Hull's sites and relevant information for reference.  See also Appendix 3 Auditing Procedure.	
1.1.3	Access to a copy of the site permit	Copy held by QHSE Manager in the offices, on computer and copy displayed in the weighbridge office.	
1.2	Accident Management Plar	1	
1.2.1	The permit holder shall:	e permit holder shall:	
a) Maintain and implement an accident management plan		Consists of several documents in the ISO Manual.	
b) Review and record (every 4 years) changes required to the plan		These documents are reviewed annually as part of the ISO 9001 certification.	
c) Make changes to the plan as identified above		Documents are reviewed and logged on the cover page of the Manual (indicating amendments of documents).	
1.3	Site Security		
1.3.1	Site security measures to prevent access to site as far as reasonably practicable		
2	Operations		
2.1	Permitted Activities		
2.1.1	The permit holder is authorised to carry out activities specified in table 2.1 of the permit.		

R13 Storage of waste consisting of materials intended for submission detailed in table 2.1.		Inspection of materials before off loading, segregation of various materials for reloading, defined quantities of storage and good housekeeping maintained.  See Operational Procedures of the ISO Manual.	
R4 Recycling or reclamation of metals or metal compounds		Use of metal reclamation techniques; shredder processing, shearing, burning and hand sorting, operation to take place on an impermeable surface with a sealed drainage system	
R5 Recycling or reclamation of other inorganic compounds		No treatment of hazardous waste allowed. EWC 16 06 01 lead batteries are not treated on site and passed onto third party licensed waste operator/carrier.	
2.1.2	The storage (and treatment of ELV's as per schedule 5 of the ELV Regs 2003)	Dismantling on impermeable pavement with sealed drainage. Appropriate storage of fluids and parts. Only de-polluted ELV's will be shredded at this site. See 2.1.1 for storage activities.	
2.1.3	The removal of coolants from air con units shall be in accordance with "Guidance of the recovery and disposal of controlled substances contained in refrigerators and freezers"	the guidance stated will be followed for recovery of coolants if required	
2.2	Waste Acceptance		
2.2.1	Wastes only accepted if: a) it is of a type listed in schedule 2, Table 2.2.	Lists of all items as Table 3 and 4 of this document.	
	b) It conforms to the description in the documentation by the producer and holder.	All materials are inspected, weighed and passed through the radiation detection equipment before off-loading.  Documentation required by drivers to identify themselves, the vehicles and the type of materials being brought to site, together with transfer note.	
2.2.2	Records maintained of all wastes accepted onto site	See above, also records are kept by the weighbridge team and invoiced to the main offices.  Transfer notes for non-hazardous materials issued at the weighbridge. Consignment note must be provided for incoming hazardous waste.  Consignment notes for hazardous materials provided by the persons taking the materials off site or by Ron Hull should this be necessary.  Rejected materials will be noted in the site diary by the site manager or his representative.  Waste returns are undertaken for hazardous wastes every quarter and annually for all other wastes.  See "Operational Procedures" of the ISO Manual.	

3	Emissions and Monitoring			
3.1	Emissions to Air, Water or Land			
3.1.1	There shall be no point source emissions to air, water or land.	Air emissions are limited by dust control measures in the main fragmenter and shredder facilities.  The site ground surface is impermeable and therefore pollutants are contained on site.  The site drainage is contained and any contaminated runoff is held in the site's main drainage channel prior to sewer in accordance with Water Discharge Policy QA16097.		
3.2	Transfers off-site			
3.2.1	Records of all wastes sent off site from the activities, either for disposal or recovery shall be maintained.	All materials leaving the site will have either a waste transfer note or consignment note (hazardous).  Waste returns will then be produced as described above.  Table 3a described materials not in the "accepted" table but are produced as a result of the operating processes.		
3.3	Fugitive emissions of substances			
3.3.1	Fugitive emission of substances (not including noise or odour) shall not cause pollution. No breach if holder has taken reasonable steps to prevent occurrence.	See sections for dust, odour and pests for guidance on how our sites will manage and control this item. Fugitive emissions from the shredder process are controlled by dust suppression (atomized spray) and air system vortex control.		
3.3.2	Litter or mud arising from activities shall not cause pollution. No breach if holder has taken reasonable steps to prevent occurrence.	See section for Litter and Mud of this document.		
3.3.3	Litter and mud arising from activities shall be cleared from affected areas outside the site a.s.a.p.	As above.		
3.3.4	All liquid wastes, whose emission to water or land could cause pollution. No breach if holder has taken reasonable steps to prevent occurrence.	Site set up with impermeable working surface and a drainage system that incorporates catchment and oil interceptors. Inspections and regular maintenance of these facilities undertaken.  Storage of liquids in bunded areas or double skinned tanks for diesel storage.  Spill response procures in place, with trained personnel and spill kits available.		
3.4	Odour			

•		,
3.4.1	Emission from activities shall be free from odour at levels likely to cause	Few materials delivered to site will emit any odour. Odorous waste will be rejected. Any problem wastes will be prioritised for removal.
	an annoyance outside the site as perceived by an EA officer. No breach if holder has taken reasonable steps to prevent occurrence.	Materials will be kept to a minimum and the materials turned around as quickly as possible to prevent odours forming and emitting odour.  Inspections undertaken to identify any issues with relation to this.  A mobile Mist blower delivers odour control chemicals to all stockpiles if required (see Odour Management Plan).
3.5	Noise	
3.5.1	Emissions from activities shall be free from noise at levels likely to cause annoyance outside the site boundary, as perceived by an EA officer. No breach if holder has taken reasonable steps to prevent occurrence.	See section for noise procedures attached to this document.  All plant and equipment to be compliant with EU limits.
3.6	Pests	
3.6.1	Scavenging animals, birds and other pests shall not cause pollution. No breach if holder has taken reasonable steps to prevent occurrence.	See Pest Management Plan (Appendix E).
3.7	Monitoring	
3.7.1	This permit does not require any monitoring of the activities, emissions or the environment	The site to maintain a good relationship with the Environment Agency and any issues discussed with them. Daily inspection of site to identify any issues (dust, odour, litter etc)
4	Information	
4.1	Records	
4.1.1	All records required by this permit shall be:	Available for inspection
	a) Legible	Most are electronic and kept on computer within the Sheffield main offices. Also see Appendix 1 Daily/Weekly Inspection and Appendix 2 Action Plan.
	b) be made as soon as reasonably possible	Tickets made out for materials at point of entry (issued by weighbridge system) and sent up to main offices.
	· · · · · · · · · · · · · · · · · · ·	

	c) If amended, be amended but the original information remains legible or capable of retrieval and	Records generated at site and kept in main office's computerised system.
	d) be retained, unless agreed by the EA for at least 6 years from date the record was made, or in case of surrender off-site environmental and health effects - the condition of land and groundwater	Records kept for 6 years as per EA permit conditions.
4.1.2	Any records required to be made by the permit shall be provided to the EA within 14 days should they be requested in writing.	Follow notification procedure submitted by the EA.
4.2	Reporting	
4.2.1	All reports and notifications required by the permit shall be sent to the EA using the contact details supplied	See 4.1.2 above.
4.2.2	A summary of the waste types and quantities accepted and removed from the site shall be made each year; and submitted within one month of request and be in a format required by the EA	Follow notification procedure for waste returns submission of waste reports on an annual submission. Hazardous Waste returns to EA every quarter and on annual submission. Note these consignment notes need to be kept for 5 years from disposal or recovery as a "consignee" party and for 3 years as a "producer".
4.3	Notifications	
4.3.1	The EA shall be notified without delay following the detection of	
	a) any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused significant pollution	The Local EA Officer is Faye Whitham  Bowbridge Close, Templeborough, Rotherham S60 1BY  Tel 01709 312729  Email faye.whitham@environment-agency.gov.uk
	b) breach of a limit specified in the permit, and	See above

	c) any significant adverse environmental and health effects	See above
4.3.2	Written confirmation of actual or potential	See above
	pollution incidents and breaches of emission limits shall be submitted within 24 hours.	
4.3.3	Prior written notification shall be given to the EA of the following events:	
	a) as soon as practical prior to the permanent cessation of any of the activities	As above (as soon as practical)
	b) cessation of operation of all or part of activities for a period likely to exceed 3 months	As above
	c) resumption of the operation of all or part as a result of b) above	As above (when resumption known)
4.3.4	Where the EA has requested in writing that it shall be notified when the permit holder is to undertake monitoring or spot sampling.	Permit holder shall inform the EA when the relevant monitoring is to take place. EA to be informed at least 14 days prior to monitoring.
4.3.5	EA to be informed within 7 days of any changes to the TCM.	Inform them of the name of the new TCM and evidence of their competency (WAMITAB or equivalent)
4.3.6	EA to be informed if any relevant person has been convicted of an offence	Undertaken within 14 days of conviction and with details of offence.  Offence will be related to the running of a scrap metal dealers site
4.3.7	EA notified within 14 days of the lodging of an appeal to the offence in question	And of the outcome of the appeal when decided
4.3.8	EA to be informed within 14 days of the occurrence of the following:	Unless where disclosure is prohibited by stock exchange rules.
	a) Where permit holder is a registered company;	Any change in the permit holders trading name, registered name or registered office address.

		Any change to the permit holders ultimate holding company, (including details if company has become a subsidiary)	
		Any steps with a view of permit holder going into administration, company arrangement or being wound up, and	
		If the permit holder is not the operator, any change to the trading name or registered address	
	b) Where the permit holder is a corporate body other than a registered company;	N/A	
	c) In any other case;	The death of any named permit holders (where the permit holder consists of more than one individual).	
		Any steps taken with a view of the permit holder going into bankruptcy, an arrangement with creditors, or in the case of a partnership and the dissolving of the partnership.	
		If the permit holder is not the operator, any change in the operators trading name, address, registered name or registered office.	
4.3.9	EA shall be notified at least 7 days in advance of the commencement of any of the activities.	Email to the relevant local EA officer would suffice.	
4.4	Interpretation		
4.4.1	In this permit the expressions listed in schedule 3 shall have the meaning given in that schedule.		

Other supportin	g information for the Manage	ement of the site
1.1	General Considerations	Simple breakdown of activities on site including list of plant.
1.1	Staffing and understanding of the requirements of the permit	Procedures in place. Staffing commitments within documentation.
1.1.1	Maintenance of Plant	Planned Preventative Maintenance procedures. Trained personnel. External contractors for lifting equipment.
1.3.1	Site Security	Fencing, CCTV and Site Security arrangements.
2.2.1	Waste acceptance and control procedures	Inspection and identification. Control procedure. Site diary. Adherence to the conditions of the permit and notices.
2.2.1 cont.	Waste quantity measurement systems	Weighbridge measurements and paperwork.  EA waste returns.  Storage quantities identified by site management.
2.2.2	Radiation	Detection procedure, flow diagram and forms, including rejected load form.
3.3.1 3.5.1 3.6.1	Control, monitoring and reporting of dusts, fibres and particulates	Inspections carried out. Reporting procedures in place.
3.3.2	Litter and mud	Control of activities in place.
3.3.4	Site Engineering for pollution prevention and control	Drainage layout plan. Interceptors installed and inspections undertaken. Contaminated areas fully contained in accordance with EA (2015). Reporting procedure in place. Emergency contact numbers. Spill control procedures and training.
3.7.1	Complaints	Monitoring and actions required process.  Complaints procedure in place.
4.1.1	Records of Waste Movements	Consignment, Transfer, Annex Vii paperwork to accompany materials; duty of care undertaken for all waste movements.  Site Diary kept by the site manager in the office/reception building.  Specific detail required by the permit conditions.
4.2.1	Provision of site identification board	In place at entrance to site with correct information displayed. Weekly inspections. Site diary information. Notification information and contact details.

4.3.1 Fires on Site Fire Prevention Plan.
---

#### 9. General Considerations

#### a. Specified waste management operations

Operations at the Sheffield Ron Hull JNR Limited site, 8 Grange Mill Lane, will involve processing metal waste into a raw material for use in foundries and steel mills. The site will receive scrap metal (mostly in the form of whole, de-polluted ELV, factory metal waste, merchant storage facility wastes and small quantities of domestic appliances) by road via the sites main entrance at Grange Mill Lane.

Whole cars will also be accepted and dismantled. Other wastes will be accepted for storage and bulking only.

Material known as 'MRF can' will be processed through the site. This material will be coded EWC 19 12 12 and termed MRF can. This material consists of ferrous and non-ferrous metal cans (70-80%), with other non-organic materials (i.e. plastic sheet and rubber) making up the remainder.

The incoming waste metals will pass through radiation detection equipment after being initially inspected and before being weighed on the weighbridge.

In relation to either processed or unprocessed 'MRF can' the accepted wastes will be sprayed with insecticide, offloaded and stored in separated heaps to assist the required treatment processes. The relevant sections of the odour policy shall also be implemented at this (reception) stage.

Any rejected loads will be noted in the site diary before being sent away from site; high emission radiation loads may need quarantining before being dealt with as our procedures (contained within this document).

The accepted wastes will then be processed through the on-site equipment (shredder, baling, shear and storage operations).

A block diagram of the shredder, shear and baling is shown below in Figure 1.

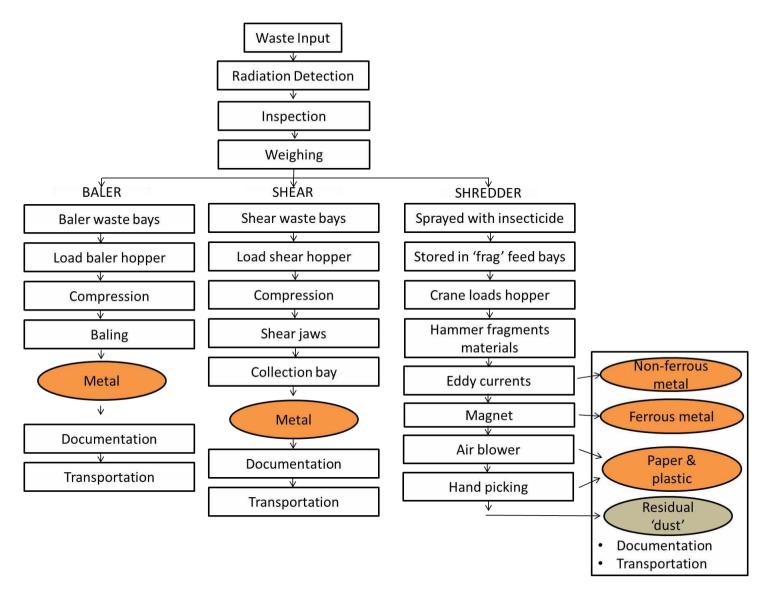


Figure 1 Process diagram for metal recycling at Ron Hull JNR Limited, Grange Mill Lane, Sheffield.

#### b. Processing the metal wastes in the shredder

- i. "Frag" feed off loaded near the shredder feed conveyor
- ii. A crane / mobile excavator with grab attachment will load the in-feed conveyor of the shredder.
- iii. The materials pass into a chamber with a rotating drum with hammer attachments; this fragmentises (breaks up) the materials which pass out onto out feed conveyors
- iv. The output materials will then pass via multiple down-stream sorting processes consisting of eddy currents, magnetic and hand picking sorting and through an air blower (which blows off the lighter materials).
- v. The magnets remove the ferrous metals (which are passed to a separate product waste pile).
- vi. The hand picking will remove any high value scrap metals which are dropped into separate containers for recycling.
- vii. The remaining "dirt" residual materials EWC 191004, 191006 and 191212 will become process waste to either be re-sorted or disposed of as landfill wastes / fuel (energy from waste).
- viii. ISS (Induction Sorting System) materials may be sold to customers with more sophisticated sorting equipment to recover the metals from this waste.

#### c. Processing the waste metals via the shear

- i. Materials are deposited near the shear.
- ii. A materials handling grab picks up this waste and deposits it into the shear hopper.
- iii. The shear operator then activates the shear to compress the product into the lower compartment where it is pushed toward to the shear jaws which guillotine the materials into the required lengths.
- iv. The materials fall into the collection bay which are then picked out by the materials handling grab and placed into a stock pile for loading onto vehicles.

#### d. Processing the waste metals via the baler

- i. Materials are deposited near the baler
- ii. A materials handling grab/magnet picks up this waste and deposits it into the baler hopper
- iii. The shear operator then activates the baler to compress the product into the lower compartment, where it is pushed toward to the baler box which compresses the material in to approx. 12" bales.
- iv. The material then ejects along the exit chute which is then picked up by the materials handling grab and placed into a stock pile for loading onto vehicles.

#### e. Stockpiling

The processed and sorted wastes will be temporarily stored at various parts of the yard. These stockpiles are limited to 5 m in height. These materials will be loaded onto containers or other vehicles then supplied to UK and foreign steel producers. The lesser quantities of non-ferrous metals will also be sold as product to both domestic UK companies and export markets. All products may be transported by road and shipments dependent on quantity. All metal wastes generated as a result of the processing activities will be removed from site after being weighed and given suitable paperwork to accompany the material.

Hazardous wastes (oils etc.) will be removed from site under hazardous waste consignment notes.

Other non-hazardous wastes will be stored in bays below the level of the bay wall to minimise generation of dust or litter. Litter netting will be provided around bays for light wastes.

All gas bottles must be stored in suitable gas bottle cages away from any combustible material.

Hazardous wastes will be stored in enclosed containers suitable to the type of waste stored. Liquid wastes must be stored in bunded areas.

POPs waste will be stored in a dedicated container segregated from other waste.

## 10. Staffing and understanding of the requirements of permit Conditions and the Environmental Management System

Whenever the facility is open to receive metal for recycling, there will be at least one member of staff on site to supervise operations. Existing staff and new staff will receive training and instruction and will be fully conversant with the requirements (conditions) of the permit and this environmental management system (formally known as the working plan), specifically:-

- Waste acceptance and control procedures
- Operational controls and any environmental monitoring
- Record keeping
- Any emergency action plans for the site
- Any requirements to notify the Environment Agency

On site there will be approximately 12 Office personnel and 14 Operatives, permanent employees involved in the operation of the waste treatment facility, this includes one COTC holder, who will act as the Technically Competent Manager (TCM) for the site. Ron Hull JNR Ltd personnel involved in waste management operations will have the appropriate training and experience to carry out their duties.

#### 11. Maintenance of Plant

Site vehicles will be maintained on a regular basis, currently on an hours worked based system.

This planned servicing will be to manufacturer's recommendations and carried out by competent persons.

LOLER inspections of lifting equipment and lifting accessories will be undertaken by competent persons and audited by Zurich (Information is available by the 'Crimson System')

Audits of the Zurich system will take place in order that their findings are carried out in a timely fashion dependent on the severity of the issue.

Inspection and defect reporting is undertaken by site personnel as they are required to undertake a daily pre-start inspection of plant and equipment before use. Trained personnel are only allowed to operate plant and equipment.

Shredding and cutting equipment must be inspected, serviced and maintained in line with the manufacturer's recommendations.

#### 11 Accident Management Plan

## 11.1 Events that could have a major environmental impact in the event of an accident/incident

- 1. Fires and smoke emission.
- 11. Smoke emission that conflicts with the M1 motorway causing incident.
- ιιι. Fires and firefighting water runoff.
- រេច. Explosion from shredder feed materials (machinery designed for this event so low risk).
- σ. Large Diesel Spills.
- σι. Flooding from the adjacent Blackburn brook (2007 latest event).
- σιι. Plant/equipment malfunction leading to events listed above

#### 11.2 Likelihood of occurrence

Fires are a moderate risk at this site as there are a number of materials on site that are potentially combustible. See Ron Hull fire prevention plan revised in November 2021 (Peak Associates QA16073d).

Smoke emission needs to be reported to the local authority or police as soon as possible if the events on site are producing sufficient smoke to cause conflict with the M1 motorway.

Large Diesel Spills during filling or delivery are unlikely as the tanks are filled by competent, trained personnel to an approved risk assessment and safe working procedures in place.

Large Diesel Spills during a collision with a site vehicle could have an impact or with vehicles colliding with the diesel storage tank (tank is double skinned and is also bunded outside this unit).

Flooding of the site from the adjacent Blackburn brook. There is a 1 in 100 year risk of the site flooding according to the EA Flood Map for Planning accessed 18<sup>th</sup> July 2016. The last flood was in 2007.

#### 11.3 Actions to minimise the consequences of the incidents.

Materials accepted on site are inspected before offloading and after offloading to identify potential of combustible materials and action required as a consequence.

Fires – Gas cutting is undertaken in a cordoned off area furthermost from the M1 motorway side of the site. Work is undertaken with competent, trained personnel. Equipment is maintained and firefighting equipment available at the location.

Large Diesel spills. All Diesel tanks are bunded; deliveries of fuel by external competent contractor; restricted speed limit for vehicle movements; reporting procedure in place for all events. The site has a contained surface water system and therefore controlled waters are protected.

#### 11.4 Action during an incident

#### Fires – see Fire Prevention Plan

Fire Water – this may have an ecological damage effect on the brook and drainage systems. All attempts will be made to control to runoff water from this type of event to prevent pollution of the brook or drainage systems. A full containment management plan is available.

#### **Smoke Emission**

Incident intervention to be prompt to identify if the authorities or emergency services need to be contacted; site activities are approximately 100 m from the M1 motorway.

#### **Large Diesel spills**

Moderate spills maybe contained using the site spill disposal kits larger spills will need further intervention by outside contractors. Spill response; this will entail the use of the oil/spill containment materials (kept alongside the storage containers), training of individuals of the use of these materials, prevention of the hazardous materials from getting into the drainage system and the immediate response of site staff to call the specific pollution control contractor.

Where possible site drainage will be protected by drain covers to stop the diesel entering the drainage system. The diesel will then be disposed of using an authorised contractor.

The drainage system as adapted does however contain design measures to retain oil in the manifold channel that serves the entire site from which a larger loss could be recovered and as an added precaution the storm overflow points are protected with oil and silt interceptors.

In terms of discharges to sewer these are also protected by oil retention infrastructure (weir plates) in the manifold and pumping station.

A hazardous waste contractor for any oil removal operation would be:

GE Waste solutions Ltd Unit 18, Charter Street, Leicester, LE1 3UD

24hr Emergency Response Tel 0844 811 8757 Email boyd@the-gegroup.co.uk Mobile: Boyd McMillan 07809 345 706

#### Flooding

The site is within the 1 in 100 year flood zone.

In the event of a forecasted flood, hazardous materials will be up lifted to high ground (near the skip holding location). Most material is metal and would have no risk of causing pollution and would by its density be difficult to mobilize in even the most severe flood scenario.

#### Plant/equipment malfunction

In the event of plant/equipment malfunction, use of the effected plant shall cease immediately on detection of the malfunction. The equipment shall then be assessed by a suitably qualified engineer and repairs be conducted, where appropriate, should suitable resources and skill sets

be available on site. If external knowledge/skills are needed, then the equipment shall be moved (if mobile plant) to the overnight storage area or an alternative suitable location to be decided by the technically competent manager.

In the event of plant malfunction, all activities the effected plant conducts shall cease until a time that the plant is suitably repaired, or an alternative functional machine can be used to conduct the job.

In the event of the main shredder malfunctioning or other plant that is vital to the sites operation, waste shall only be accepted onto the site and stored in a manner that enables:

- Rapid processing of materials to recoup losses during shredder down time
- Safe storage of feedstocks that limit risk of fire
- Access to all bays and storage areas by emergency services in the event of a fire
- Utilization of all areas of designated feedstock/product storage areas to enable buffering to business losses while limiting risk of further incidents (fire, spills etc.)
- Acceses to each storage area to enable temperature monitoring
- Access to the two emergency storage areas that are used during active firefighting methods outlined in the sites fire prevention plan.

During the repair of the plant, storage bays that are typically used for the storage of products may be used to store incoming feedstock up to the maximum dimensions given for the storage area ensuring any freeboard restrictions are complied with.

The daily management of the sites waste acceptance and storage shall be overseen by the sites technically competent manager (TCM). Suitable measures shall be taken to prevent dust, mud, litter being tracked off site as seen fit by the TCM with external consultation with a suitably qualified consultant as necessary.

#### 11.5 Emergency Contact Details

Site Manager:

 Martin Booth
 07725792679

 Dennis Welbourn
 07880725348

 Office
 01709 524115

Director: Nigel Hull 07957 377 232

**Technical Competence** 

Managers: Mark Hull/Sean Haywood 07957 377 236/ 07960 582 436

Other contacts

EA Bex Barrett 020302 53717 EA Hotline 0800 80 70 60

EA Hotline 0800 80 70 60 General Enquiry 03708 506 506

Emergency Services Call 999 and ask for the service you require (Police, Fire Brigade,

Ambulance, etc.). In the event of fire, consult the fire prevention

plan (held in main office and weighbridge office).

#### 12 Site Drainage

#### 12.2 Surface water

Sheffield city has a mean annual rainfall of 834.6 mm (Met Office, accessed 26<sup>th</sup> October 2016) which equates to 2.2 mm per day. The rainfall pattern for the area also suggests it rains as many days as it does not which means that on an average day when rainfall occurs there will on average be 4.4 mm of rainfall to dispose of.

All surface water on the upper and lower yards, until October 2016, collected in a 190 m long, 1.3 m width, 0.8-1m deep manifold, with a maximum working retention capacity of approximately 200 - 230 m<sup>3</sup> (see Plan 6). Until September 2016 this common manifold water discharged to Blackburn Brook via three interceptors under permit WRA8399.

Since the site commenced handling sorted recycled and sorted metal can (commonly termed 'MRF Can' under a 19 12 02 code, this being the code it has been consigned into the site by suppliers) two of these interceptors have been sealed and the discharge to Blackburn Brook is only active during extreme rainfall events under permit NE/WRA8399/001.

The revision to the drainage system involves this manifold being modified with a set of weir plates that retain solids and free phase hydrocarbons which are held at three points along it.

The residual effluent from the manifold will then be pumped to foul sewer via a pumping station under the terms of a trade effluent consent with Yorkshire Water Services Ltd and the plan is that under the normal pattern of rainfall experienced discharges will via the process of balancing in the manifold and pumping to the sewer be discharged to the public sewer for treatment at Blackburn Meadows Sewage Treatment Works which in terms of capacity is one of the largest in the UK.

In the event that the water may be contaminated pumping can be stopped and water would be held in the manifold and in the associated gullies and site surface. A decision can then be made in consultation with Yorkshire Water to release the water to sewer or collect by tanker for disposal at an authorised site.

Any residual storm discharges through the interceptors shall be monitored during the period December 2021-March 2021 to ensure these comply with the descriptive consents that will remain in place for each surface water outlet.

#### 12.3 Wash bay

The upper yard consists of administration buildings, asphalt carpark, a wash bay and skip storage area (see Plan 6). The wash bay and skip storage area drain into a dedicated system which includes a sediment trap. The waste water from these areas will in future also drain to the trade effluent point and onto public sewer.

#### 12.4 Trade effluent discharge to sewer

A rising main is in place to transfer the manifold water to the trade effluent point on the Upper Yard (see Plan 6). Two (duty and standby) 4 litre/sec electric pumps will provide the flow pressure.

The manifold water, plus the water from the wash bay and skip area will be charged at trade effluent rates.

#### 12.5 Domestic waste water

The domestic waste water from the toilets, wash rooms and kitchen areas in the administration buildings on the upper yard goes by private drainge and then to the public sewer on Grange Mill Lane (Plan 6).

#### 12.6 Monitoring

The trade effluent point contains a flow meter which is specified by Yorkshire Water to provide annual flow data. As per YWSL requirements a sample point has also been included as shown on Plan 6. Sampling may also be undertaken at this location, with sampling completed quarterly for general monitoring, and samples sent to a UKAS accredited environmental laboratory.

The following determinants will be tested for each sample with consented/guidance limits shown (if known at this stage):

- 12.6.1 Biochemical oxygen demand
- 12.6.2 Chemical oxygen demand (2500 mg/l))
- 12.6.3 Total ammoniacal nitrogen (110 mg/l)
- 12.6.4 Total solids, settled(500 mg/l))
- 12.6.5 Total Arsenic
- 12.6.6 Total Boron (20 mg/l)
- 12.6.7 Total Cadmium
- 12.6.8 Total Chromium
- 12.6.9 Total Copper (1 mg/l)
- 12.6.10Total Lead (1mg/l)
- 12.6.11Total Mercury
- 12.6.12Total Nickel (1 mg/l)
- 12.6.13Total Selenium
- 12.6.14Total Zinc (3 mg/l)
- 12.6.15EPH (C10-C40) Total petroleum hydrocarbons (to be determined)
- 12.6.16pH (6-10)

All results will be held by Ron Hull JNR Limited either in electronic or paper format.

Any additional tests will be clarified with the sewer undertaker and the results supplied to them and kept on record by Ron Hull JNR Limited. YWSL will normally conduct their own sampling at the trade effluent point.

The results of the monitoring will be recorded and compared to previous sampling periods and any issues raised with Ron Hull. This will allow Ron Hull to track the effluent quality and ensure they are compliant with trade effluent limits.

Where determinants have exceeded the consented limits or have increased significantly from the previous sampling visit, then corrective action will be recommended and discussed. Where appropriate, corrective action will be implemented. This can include: inspecting the lower yard manifold; de-silting and cleaning the lower yard manifold and pump station; reviewing waste stored on the lower yard and investigating any potential leaks (e.g. hydraulic oil).

Ron Hull JNR will review the effluent quality data as part of their quarterly site management checks.

#### 13 Site Security

#### 13.2 Perimeter fence and gates

A security fence consisting either of brick, concrete, palisade or wooden fencing surrounds the site, it is on average 2.44m high at the road side and much taller to the rear, the entrance gates

are high strength security palisade type and locked when the site is closed.

Site fencing will be visually inspected by a site operative at the start of a working day. Any observations will be recorded in the site diary. If any defects are found, they will be made secure by the end of the working day and reported to the TCM for permanent repair within seven working days.

#### 13.3 CCTV for Site Security

CCTV covers various areas of the yard, crucially the entrance and plant; this can be operated internally and remotely.

The site is also guarded by an external contractor for all out of hours periods; reports of incident are made to the site manager in a timely manner dependent of the severity.

#### 13.4 Security Lighting

The site has flood lighting around the perimeter fence to assist the security guards; this lighting will also allow activities and operations on site to continue during periods of low light levels / darkness.

The lighting is fixed to columns around the site and will be used by both security and for operational purposes. As stated, defects to the site lighting will be reported to the TCM for repair/replacement as soon as possible but within 7 working days of report of incident.

#### 14 Complaints Procedure

Any complaint received by the Company will be treated seriously, respectfully and in a timely manner.

The forms listed below will be used:

- Site Daily Checklist and Diary
- Complaints Log & Investigation
- Record investigations & Actions
- Record feedback to complainant.
- Odour Complaint Form

The target time to investigate and feedback a complaint is variable but we aim to resolve within 1 week and if necessary discuss items in the following site HSE meeting.

#### **Complaints & Investigation form**

Date complaint received:	
Ron Hull JNR Employee receiving complaint:	
Complaint made via (EA, Local Council, HSE and direct f	rom public):
Contact details:	
Nature of complaint	
Investigation Details:	
Signed	Date
	Date
Signed  Actions required / Suggestions to prevent re-occurrence:	Date
	Date
Actions required / Suggestions to prevent re-occurrence:  Signed	
Actions required / Suggestions to prevent re-occurrence:	
Actions required / Suggestions to prevent re-occurrence:  Signed	

#### 15 Record Keeping

#### 15.2 Security and availability of records

All waste documentation pertinent to the movement of waste in and out of the site will be stored at the offices or at the weighbridge and will be retained for a minimum of 6 years as per the site permit conditions. These records will be made available to the Environment Agency upon request, but are not required to be made publicly available.

#### 15.3 Records of waste movements

All transfer notes for material incoming and outgoing will be kept within the company for 6 years (duty of care requirements, transfer notes 2 years, consignment notes require 3 - 5 years).

These notes will usually be generated through our electronic stock control system.

Other records relating to off-site environmental / health effects and condition of land and groundwater are required to be kept until the permit is surrendered

Records are kept on site at the weighbridge office, with invoices prepared and controlled at the main office on site.

Records regarding the quantity and type of wastes received and removed from site by Ron Hull will be retained in paper format in the weighbridge/reception offices.

An annual summary record of incoming and outgoing wastes is sent to the EA at the end of the financial year, (this is based on the quarterly returns sent to the Environment Agency). Hazardous wastes returns are generated on a quarterly basis.

#### 15.4 Site Diary

A site diary will be kept in the site management office for recording events that are specific to the waste treatment facility. Records will be entered into the site diary within 24 hours of the event.

In addition to the events already mentioned in earlier sections of this document, the site diary will be used for recording pertinent information.

See Appendix A and B later in this procedure for example of the diary record sheet and action plan.

#### 15.5 Site Notice Board

The EA "Guidance on the conditions for fixed Waste Management Licences" Version 1.0 requires a site notice board with the following details:

#### **Ron Hull JNR Limited**

Site / Emergency Contacts

Site Managers: Martin Booth & Dennis Welbourn 07725792679 / 07880725348

Office: 01709524115

Director: Nigel Hull

This site is permitted by the Environment Agency

Licence No / Permit Ref: EA WML 65522 / EPR/PP3196ZD

Environment Agency Enquires: 03708 506506

0800 807 060

For information only (not required on notice board)

EA Officer for Sheffield Site: Bex Barrett Contact No. 02030253717

Sheffield City Council SMD Licensing Contact No. 0114 203 7752

SMD Licence Number SC 045 SL

Waste Carrier Licence number - CBDU83762

Site Operation Hours

Monday to Friday 07.00hrs – 18.00hrs Saturday 07.00hrs – 12.00hrs

Sunday and Public Holidays CLOSED

The site identification board at the entrance will be inspected weekly for damage or defects by a site operative. Any observations will be reported to the TCM and recorded in the site diary. Any defects will be remedied within 7 working days.

#### Appendix A

#### **Ron Hull JNR Ltd Site Diary**

#### DAILY/ WEEKLY INSPECTION CHECKLIST

GROUP

	GROUP	Site:		_							
		Week Com		_							
		Site Manag	gers N	ame:							
,	File in G3										
į	Inspected Items	Frequency	Mo n	Tu e	We d	Thur s	Fr i	Sa t	Su n	TCM Weekl y Audit	Date CAR raised/ Exceptio n Report Ref
	Person Completing the Checklist	Daily Initials									
	All Facilities	miliaio	1		L		ı			1	
1	Condition of Site ID Board & Signs	Weekly									
2	Condition of Access, Site Road & Hardstanding	Weekly									
3	Condition of Impermeable Pavement	Weekly									
4	Site Building & Welfare	Weekly									
5	Condition of Interceptors	Weekly		Exter	nal Che	cked/Em	ptied -	Yes/N	<b>1</b> 0		
6	Waste Type, Quantities & Storage	Daily									
7	Waste Acceptance / Inspection & Duty of Care	Daily									
8	Condition of Fencing, Flood Wall, Gates & Security	Daily									
9	Condition of ALL Waste Containers (General / Oil /etc)	Daily									
10	Condition of Yard Lighting System	Daily									
11	Condition of fuel & storage tanks, inc containment systems	Daily									
12	Other liquid storage; Availability of spillage kit	Daily									
13	Fire; Availability of emergency equipment (inc vehicles)	Daily									
14	Surface Water Management e.g. Drainage System	Daily									
15	Control of Litter inc. fly tipping	Daily									
16	Control of Odour	Daily									
17	Control of Dust	Daily									
18	Control of Noise	Daily									
19	Control of Pests / Vermin	Daily									
20	Control of Mud / Debris on Road	Daily									
21	Are Fire Exits Clear and Operational	Daily									
22	Stockpile temp and moisture	Daily									
23	Technically Competent Person Hours on Site	,									

$\checkmark$	= Satisfactory;	X = Unsatisfactory;	NI = Not Inspected;	NA = Not Ap	plicable
--------------	-----------------	---------------------	---------------------	-------------	----------

- Checklist should be completed at the end of each day to record the standard and exceptions of that day's operation.
   If the unsatisfactory condition is minor and resolved the same day, remedial action/ comments to be recorded over page. Otherwise Manual Corrective Action Report (CAR) should be raised with Date CAR raised/ Exception Report reference number recorded on right hand column.

TCM Signature:	
	Date:

#### Appendix B

# DAILY/ WEEKLY INSPECTION ACTION PLAN (CAR)



	Site: _	
	Week	
	Commencing:	
Monday		
Monday		
Tuesday		
Wednesday		
Thursday		
,		
Friday		
Cotunday		
Saturday		
Other Comments:		

#### **Appendix C**

#### **Auditing**

The site will have a quality, health, safety and environment audit conducted (as a minimum) on an annual basis to ensure the processes in place are being undertaken and that areas for continual improvement are sort.

The audit will also include elements to ensure compliance with the permit conditions and EA CAR reporting and closure.

Where areas of non-compliance are observed, an action to return the site to compliance will be developed and acted upon.

The Audit will include (but not limited to):

- Ensuring permitted activities take place
- Inspections of site infrastructure / conditions / work activities
- Inspections of the site notice board
- Inspections of site records / procedures
- Review of safe systems of work and risk assessments
- Review of site diaries
- Review of transfer / consignment notes and hazardous waste register
- Accident / incidents
- Customer complaints
- Odour complaints (>4 per month)

Additionally the QHSE Manager will attend site periodically to carryout site inspections in coordination with the Site Manager.

The audits will be logged on the company's annual audit review program; findings will be displayed on the sites notice board

Appendix D

Ron Hull JNR Ltd Waste Management Permit Risk Assessment

Risk Ite m	Source	Hazard pathway	Receptor	Summary of Risk	Likelihood	Severity	Risk Rating	Controls	EMS Ref	Responsibility
1	Contaminated liquids from waste materials.	Spillages onto the site hard standing	Surface water.	Small leaks/spills can be effectively contained within the site concrete hard standing.	3	1	3	Environmental Management System (EMS) inclusion for the daily inspection of all incoming waste materials and storage areas for leaks and spills. Staff will have training on how to clean up site spills before recommencing work on site. The site has a sealed drainage system to sewer.	Waste acceptance procedure (ref 2. 2.1). Spill Procedure (ref 3.3.4). Site Diary App A (ref 4.1.1).	Site manager, crane operatives.
2	Radioactive waste materials.	Direct contact, dust, air emissions, surface water.	People, natural ecosystems, surface and ground water, sewer and footpath.	Radioactive wastes may present H&S issue for workers, if materials allowed to remain on the site.	1	3	3	EMS inclusion for preventing radioactive wastes from entering site. In the unlikely event of this, the waste will be scanned with detection equipment the load may then be quarantined prior to prompt removal from	Waste acceptance procedure (ref 2.2.1). Radioactive source detection procedure (ref 2.2.2).	Site manager, weighbridge operative.

								site by authorised carrier. RPA provision Robin Cotton on call at any time. Staff will have training regarding this type of event.	Reject Load form.	
3	Spills of residual liquid contaminants from waste being processed in the hammer mill and shredder.	Spillages onto the site hard standing, surface water.	Site workers, sewer.	Small leaks and spills will be contained in the hammer mill and shredder which require periodic inspection and cleansing as per spill procedure.	2	1	2	The hammer mill will have an integrated catchment tray for spills and leaks. EMS inclusion for the daily inspection of any drip trays or catchment receptacles, and provisions made for these to be emptied when necessary. Observations will be made in the site diary. The site has a sealed drainage system to sewer.	Site Operations including Waste Process Flow Chart Spill Procedure Site Diary Maintenance of Plant (ref 1.1.1).	Site manager, Fitter, Hammer Mill Operator, Site Operatives.
4	Emissions from dust extraction plant.	Dust emissions to air.	People, housing, local business, local woodland, footpath.	The planned processes are inherently dusty which if uncontrolled could present a localised nuisance and pollution issue.	2	1	2	There is dust suppression equipment installed in the hammer mill and air blower sections of the plant to prevent the fugitive dust emissions from site. This will be maintained as per manufacturer's recommendations.	Dust control procedure, maintenance of plant and complaints procedure.	Site manager, Fitter, Hammer Mill and Shredder Operators.

5	Leachate of pollutants from processed waste products.	Surface water.	People, local business, sewer.	Stockpiles of processed product will have small amounts of residual contaminants. Rain water may wash some of these pollutants onto the impermeable yard surface.	2	1	2	The site has a main surface water manifold which is discharged to sewer or if necessary tankered (approved waste carrier). Site can be operate under full containment when required.	Permit conditions. Dust control procedure.	Site manager.
6	Fires within the stored materials.	Combustible waste materials, air.	People, housing, woodland, schools, motorway, local business, footpath.	A fire on site would create a significant health and safety and environmental issue. Endangerment of life and significant property damage.	2	3	6	The likelihood of fires on site a relatively small, however the impact if one does occur is significant. The emergency procedure is in place and to be followed by the site manager or delegated person Firefighting equipment (for small fires) is present on site but if a fire occurs in the stored materials, the fire brigade must be called immediately. Fire procedures are in place with contact numbers displayed	Company EMS, Emergency procedures, Contact notice board, FPP.	Site manager.

								Contact to Company management must be undertaken once the fire service and personnel are removed from the risk of injury. Reports undertaken to determine actions needed to prevent reoccurrence if applicable.		
7	Vandalism to waste treatment plant or equipment and stored materials.	Air, surface water.	People, housing, local woodland, Blackburn Brook, sewer, local business, schools.	If the site is not secured properly, then unauthorised entry could lead to vandalism issues.	1	3	3	The site is secured using a 2m high palisade steel fence and gate. Security lighting and CCTV is fixed on columns around the site. Site is locked up at night. Site security for out of hours. Access to site by one location only at the Grange Mill Lane side of site.	Site Security, Emergency Procedures, Contact Notice Board.	Site Manager, Site Operatives, Weighbridge Operative.
8	Flooding.	Surface water.	People, housing, surface and ground water, local woodland, local business.	Flooding of the site will increase the risk of contaminants within stored materials being released, polluting watercourses and	2	3	6	Flood defense boundary wall shown on site plan. Stored materials (fluids) in suitable containers to prevent release if flooding occurs (i.e. bunded fuel store, waste oils in	Site Diary, Contact Notice Board, Accident management plan.	Site Manager, Site Operatives.

9	Domestic sewage.	Surface water.	People, surface water, ground water, local woodland, footpath, local businesses.	affecting ecosystems. Leaks of system into surrounding watercourses.	1	2	2	plastic containers secured on site).  Foul water is connected to the Yorkshire Water sewage system. Reporting procedure in place to report any related issues.	Site Diary.	Site manager.
10	Odour.	Air and surface water.	People, local business, housing, footpath, schools.	All waste will have a degree of odour. The extent to which the odour extends beyond the site boundary determines odour as a potential nuisance.	2	2	4	Odour Management Plan adopted by all site staff. Mistblower used to dispense odour control chemicals. Fine sprays installed along site boundary. Waste not accepted if appropriate measures will not be sufficient to tackle odour. Waste processed quickly. Complaints procedure in place.	Site diary, odour report form, complaints form, Odour Managemen t Plan.	Site manager, weighbridge operative.
11	Noise from shredder.	Air.	People, housing, local business, road users, footpath.	The shredder unit emits noise from the loading, shredding and sorting of waste materials. Occasional explosions from	3	1	3	The plant is housed within a building to minimize noise levels. Activity is only during working hours. Plant is maintained to a schedule to ensure running gear is optimized (i.e. reduced	Table 2A of the EMS. Daily diary.	Site manager, crane operator, shredder operator.

				accidental ingress of gas cylinders.				vibration and friction). Gas cylinders are checked in input waste.		
12	Noise from general site operations.	Air.	People, housing, local business, road users, footpath.	The transfer of waste on site involving the maneuvering of vehicles, tipping and lifting will incur a degree of noise.	3	1	3	The site is located within a valley and as such noise is contained within the immediate area. A line of fencing along the north, west and south boundary limits noise being transferred. Noise levels are checked daily. Main activities are within working hours.	Table 2A of the EMS. Daily diary.	Site manager.
13	Vibration from waste processing.	Land, air.	People, local business.	The processing of metal waste requires a degree of cutting and shearing which will create vibration.	2	2	4	Vibration is kept to a minimum and plant operated only during working hours.	Daily diary.	Site manager.
14	Fugitive emissions - dust	Air	People, local business, housing, schools, highway users.	Dust can become airborne if wind speeds are sufficient to left particles from the yard hardstanding, if vehicle tyres lift particles, or from	2	2	4	Dust on the hardstanding is minimized through daily sweeping of the yard surface. During periods of high winds, checks will be made for dust emissions and	Daily diary. Complaints form.	Site manager.

				dry waste stockpiles.				corrective action taken (e.g. water suppression).		
15	Fugitive emissions - litter	Land, air and surface water.	People, local business, highways.	Litter can be generated by wind lifting light items (e.g. paper, plastic sheet) from waste stockpiles. Litter may also migrate off site from vehicles arriving or departing.	2	1	2	The site is surrounded by high walls and fencing, with a net curtain along the northwest boundary to catch litter. Daily litter picking on the yard and boundary conducted.	Daily diary. Complaints record form.	Site manager.
16	Fugitive emissions - pests	Air, land.	People, local business, highway.	Pests attracted to the site can include flies and rodents.	2	2	4	Flies are controlled using a mistblower which delivers pesticide to all waste stockpiles. All waste is processed or transferred off site as soon as possible to avoid attracting flies. Daily walkovers check for fly numbers being within acceptable limits.  Rodent traps are located around the site boundary and inspected daily.	Pest management plan, daily record sheet, complaints record form.	Site manager.

### Appendix E

**Pest Management Plan** 



#### Focused On Pest Control

#### Focused On You

#### Address

Killgerm Chemicals Ltd PO Box 2 Ossett WF5 9NA

#### General:

Tel: 01924 268400 | Fax: 01924 267874 **Sales & Customer Services Team:** Tel: 01924 268420 | Fax: 01924 264757

**Technical Department:** Tel: 01924 268400

Training:

Tel: 01924 268445

**Product Safety Data Sheets:** 

Tel: 01924 268453 | Fax: 01924 265514

# Pest and Odour Management Plan For Ron Hull JNR Ltd, 8 Grange Mill Lane, Sheffield S91HW

#### **Background To Problem**

During the walkover survey undertaken by Ian Parry (FRSPH) and representatives of the previous occupants it was noted that the visible fly activity (Lesser House Fly) was typical of the activity from what the client Company call MRF can waste and the metal product recovered and residual waste produced from it

#### **Survey Notes:**

- \* Flies are predominantly Lesser House Fly as identified by the irregular flight pattern and body size/coloration. Having spoken with Dr Matthew Davies in Killgerm's technical team he said that the flight pattern is a feature of the male of the species and that they are likely to be attracted to the waste and loitering in search of a female. The waste appears to be attractive and support this behaviour.
- \* Lesser House Fly breed mainly in semi liquid organic matter (faecal matter) such as that found on farms/chicken housing/sewage etc. Having examined the waste on site to a depth of approx. six inches it is unlikely that the waste on site is actually providing a breeding site for the flies. Within the area inspected I could find no signs of larva.
- \* It is <u>more likely</u> that flies are either breeding in the surrounding area (flies can migrate up to 2 miles) and there is a river and major sewage works within this radius. It is most likely flies in the area are being attracted to the site, or are <u>being delivered</u> in on the waste from other sites. Staff do report flies coming off waste as it is tipped.

#### Recommendations for the Site's Environmental Management System

A daily log/record should be implemented, which will initiate inspection of incoming recyclable material and, consequently, will determine whether the application of an insecticide is required.

The direct application of an "oil-based", ready-to-use, non-persistent, quick knock down insecticide approved for outdoor use will be effective and, if required, can be used on a daily basis due to the recyclable materials being processed within 24 hours. Pybuthrin 33 is one such insecticide - applied Monday to Thursday.

As waste material is likely to be stood over the weekend, it is suggested that any fly activity can be controlled through the application of a residual, broad spectrum, insecticide which will offer ongoing control while awaiting process. Vazor Cypermethrin 10 is a residual insecticide that has a proven record against flies and holds relevant approvals.

Application of both insecticides directly onto the waste material, and its by-product, can be achieved by means of a backpack device such as the Cifarelli M3A Powered Knapsack Mister.

The M3A is an ideal applicator of insecticides at low volume applications, particularly where access to the target species is limited. With its variable flow control it is capable of reaching up to 17 metres in calm weather conditions.

The use of disposable fly attractant bags (Redtop) strategically located around the perimeter of the site should provide, to some degree, a barrier against flies attracted to the site as well as those attempting to leave. These will need to be replaced on a regular basis and record kept of their effectiveness (fly capture) - the bags can hold up to 20,000 flies and are normally effective for up to 2 months or so.

**Odour Control** - It was observed that a mobile odour control unit was on site and, consequently, application of a proprietary odour control product should prove effective against combatting malodours. It is probable that malodour will only be an issue when deliveries of waste materials are made - often a result of waste material being transported, hours long, in closed storage. Odours will often diminish as the waste material dries in the open air.

**Rat Activity** - Fresh droppings was noted on the dwarf wall that backs onto the water course at the bottom end of the site. One burrow was noted in material close to the wall to the north of the site (since noted this has a circular drainage hole in the vicinity of the burrow. It is recommended that a baiting and monitoring programme is carried out in accordance with the Campaign for Responsible Rodenticide Use (CRRU) code of practice.

As discussed above, Killgerm Chemicals will be able to provide <u>all</u> relevant staff training which normally takes half a day and costs £300.00 plus Vat. In brief, the course covers fly biology, control methods, equipment demonstration, product labels and understanding their importance, safe working practices, COSHH and correct PPE. It is anticipated that training could take place on site within the next 4 weeks.

Following successful staff training and assessment it would be possible to supply the necessary professional use only insecticides, equipment and PPE.

I hope that the aforementioned is of help and meets with your approval.

Ian Parry FRSPH Killgerm

### Plans

