



AC
ENVIRONMENTAL
CONSULTING

Environmental Management System



Blancomet Recycling UK Ltd

Opal Way Stone Business Park,
Stone, ST15 0SS

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Ref: B.PT.EMS.2512

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1. LOCATION

Blancomet Recycling Ltd is seeking to vary their existing bespoke permit (Ref: EPR/KP3439JU), which currently allows them to operate a hazardous waste treatment facility at Opal Way, Stone Business Park, Stone, Staffordshire, ST15 0SS. The variation includes the addition of EWC codes, and a change of the site storage locations. The site is currently designed to handle 22,300 tonnes per annum of catalytic convertors, batteries, wiring looms, alloy wheels and printed circuit boards. The site is part of an industrial estate and consists of a large industrial unit of steel frame construction with two smaller similar units which is surrounded by additional industrial and commercial properties with open fields to the south. Reference to the DEFRA Air Quality Management Area (AQMA) interactive map indicates that the site is not within an AQMA for any pollutants (NO_x, PM₁₀, SO₂).

The site is located within an area classified Flood Risk Low, indicating that this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%) each year. The nearest residential housing is located approximately 400m to the north-northeast on Burchall Avenue.

2. HISTORY

Reference to historical IOS maps indicates that the site consisted of open field (possibly farmland) for all the recordings including dates: 1898, 1915, 1938 and 1941. Google Earth imagery illustrates the site has been an industrial park and unit since 2001.

3. SITE DESIGN

3.1 Design

The site is entirely covered by concrete, with a large 3 storey building in the central part of the site with two smaller steel buildings and 3 ISO containers used for storage. The perimeter of the site is constructed of palisade fencing. The building situated in the centre of the site is used for most of the sites operations.

A weighbridge area is located in the southern area of the site. The site layout is as shown on the Fire Prevention Plan, 241021BS101

Wastes will be brought on to site mainly by Blancomet's own vehicles and occasionally through third party contractor vehicles and will be delivered directly to the reception area of the three roller shutter doors in the main building for immediate visual inspection and sortation. CATs will be sorted between those with a steel and those with a ceramic internal matrix before being stored in the Dolav boxes. Wiring looms will be separated according to the waste transfer note, as this will tell operatives if the

wiring looms contain POPs. Both lead-acid batteries, and alloy wheels are sorted according to their stockpiles.

The site is currently designed to handle 22,300 tonnes per annum of catalytic converters, batteries, wiring looms, alloy wheels and printed circuit boards. 17,500 tonnes of this is Hazardous waste whilst the remaining 4,800 tonnes is Non-Hazardous waste. Each waste stream has its own dedicated processing area.

The site layout has been designed to enable the efficient recycling of wastes.

Operational processes have been outlined below:

Grading Area

Accepted catalytic converters are stored within the Fixed Canopy Area before being transferred to the grading area for grading and sorting.

No more than 4 tonnes of hazardous CATs shall be held within the building at any one time.

Cutting Room Area

In this area, catalytic converters are de-canned into a sealable metal drum. The RCF is removed at this stage, double bagged in red 400 gauge polythene bags which are tied off and stored in a marked, secure, lockable container prior to consignment off-site to a suitably permitted facility. The ceramic and steel monoliths are kept as separate waste streams and taken to the mezzanine floor Crushing area.

Crushing Chute

The crushing Chutes are located on the mezzanine floor. The steel or ceramic monoliths are loaded into the relevant chute and travel back to the ground floor to be crushed by the crushing machine. The crushing machine discharges them into resealable metal drums in powder form. After this process, the drums are taken to the Mixing area.

Mixing Area

Crushed ceramic and steel powder is kept separate and mixed in separate lines. All powders are blended, separately, to homogenise to meet customer requirements. Powders are loaded from the barrels on the mezzanine floor via the hatch opening into the secure mixer. After the mixing process, the powders are being discharged into a resealable metal drums. These metal drums are then loaded onto pallets and taken to the storage area. For the avoidance of doubt, "mixing" does not refer to

mixing steel with ceramic powders, these are separate products and are kept separate throughout the entire process.

Lead-acid Batteries - Cutting Room Area

Sorted batteries are placed on a conveyor, which takes them to the cutting saw. The saw removes the top of the battery and acid drains onto the seamless stainless-steel flooring underneath all the cutting room area. Acid is kept separate from staff by the construction of the flooring and the use of PPE. All acid is collected in the stainless-steel tank outside the area. Acid is collected from the tank by the authorised acid treatment companies. After batteries are cut open, the next conveyor takes to batteries to the separation table, where lead is separated from plastic.

Lead-acid Batteries - Separating Room Area

Lead plates are removed from the battery carcasses and collected in bags. They are then taken to the drying room area, while plastic is washed in a wet separator and goes into the mill.

Lead-acid Batteries - Drying Area

Lead is put on specially manufactured shelving in the drying area with dip trays to collect any remaining acid, until it is dry. The process is expedited by the use of an airblade drying system. Once dry the lead plates are loaded into bags and stored externally.

Lead-acid Batteries – Plastic Mill

Plastic is washed in a wet separator, granulated in the mill and then blended. Washed wet plastics are stored in the secure compound in the yard in tonne bags. At any one time, there may be up to 40 tonnes of mixed plastics held externally on site.

Within the building there may be one or two bags of plastics within the milling area awaiting removal to the secure compound.

Non-Lead-acid Batteries

The site also handles non-lead-acid batteries which do not undergo any treatment. These batteries are sorted and stored in the designated stockpiles in either the warehouse, or the ISO containers as outlined below:

- Smaller Ni-Cd batteries (older power tools, emergency lighting, portable battery-operated devices, etc) will be stored in ISO lidded watertight plastic barrels in secure ISO container. Terminals will be taped with insulation tape.

- Lithium-Ion Batteries (laptop batteries, modern telephone equipment, power tools, medical equipment, modern portable appliances) will be stored in ISO lidded watertight plastic barrels in secure ISO container. Trailing wires will have their ends securely taped with insulation tape- Batteries will be layered with Vermiculite in between layers, to prevent terminals from touching.
- Lithium-Ion Batteries- EV Vehicle Batteries- Stored loose in battery plastic boxes within the secure ISO container.
- Ni-MH- old mobile phones, older power tools, portable devices- will be stored in ISO lidded watertight plastic barrels in secure ISO container. Trailing wires will have their ends securely taped with insulation tape- Batteries will be layered with Vermiculite in between layers, to prevent terminals from touching.
- Hybrid Batteries- Stored loose in battery plastic boxes in the secure ISO container.
- Ni-cd batteries, stored separately in plastic battery boxes within warehouse
- Mercury-contain batteries, stored separately in plastic battery boxes within warehouse
- Alkaline batteries, stored separately in plastic battery boxes within warehouse
- Other batteries and accumulators stored separately in plastic battery boxes within warehouse
- Hazardous components removed from discard equipment e.g. PCB board from various electronic equipment are all stored separately in plastic battery boxes within warehouse

Wiring Looms

Wiring looms are stored externally in the secure compound prior to processing. At most 3 or 4 bags of looms will be brought onto the mezzanine to be granulated. Initially the looms are processed to remove terminals/ends. They are then mixed with chalk dust and dropped into the hoppers of shredders located on the floor below, which are fitted with Filtex dust extraction.

Shredded looms are then fed into a granulator with an overband magnet on the outlet and the product is then fed into a floating tank separator which separates copper from the granulated plastic insulating sheath.

The wet plastic product is stored in 1 – 2 sealed battery boxes before removal to storage outside and despatch to a downstream recycler.

The wet, granulated copper is stored internally on racking in up to 24 no. 1 tonne bags.

All of the processes above are designed to maintain very low stock volumes within the building.

Minimal stockholding of unprocessed will be held within the building and products of lower

values will all be held outdoors. Only washed granulated copper and dry powdered catalytic converter matrix will be held indoors. Neither of these products is flammable.

The only flammable wastes held in the building will be the stock awaiting treatment, no more than 8 tonnes of material in 2 stockpiles, and the very small quantities within the processing machinery.

3.2 Vulnerable Locations

There are sensitive receptors within 1km of the site, the closest being the residential properties located approximately 400m to the north. Within the 1km radius from the site, there are 2 educational sites, as well as there being a Local Nature Reserve, Crown Meadows, within the area, waterways and the A34 trunk road. In terms of educational facilities, the closest is Walton Priory Middle School located 670m north-northwest of the site, with Pirehill First School being 980m north-northwest of the site also.

To the east of the site runs the River Trent, which, at its nearest lies some 825m to the NE, with part of the river being in the Crown Meadows LNR.

Due to the distance of the site from the sensitive receptors, all processing being undertaken indoors and the mitigative measures in place, the nearby receptors are at very low risk of experiencing adverse impacts from the site. The site is fully surfaced with impermeable concrete, has water containment measures and pollution control measures in place to prevent pollution e.g. spill kits and FloodSax barriers. In the event that sensitive receptors may be at risk, they will be notified by phone call or by site operatives knocking on doors and informing them of the incident and reassuring them that every measure is being taken to control and rectify the situation.

3.3 Drainage

The permitted area consists of waste processing areas within the buildings which are entirely indoors and therefore there is no concern regarding run-off from rainfall from these areas. There are small stockpiles of metal and plastic wastes outside which are contained in bags or skips ready for despatch from site, which present little risk of run off. Non lead acid batteries are also stored within ISO containers in the NW part of the site and therefore also present no risk of contamination.

Site drainage is therefore at a very low risk of contamination. Any potential spillages will be dealt with appropriately within the permitted area using the spill kit that is provided on site.

The areas of the site which contain wastes is entirely surfaced with an impermeable concrete surface. The one exception to this is the area of the site where stockpile 14 sits, this is of tarmac. However the

wastes here site within an ISO container and there are no liquids stored within the containers. No risk of spillage or run off exists from this source.

Site drainage is shown on drawing 241021BS101 and consists of a number of drain entry points around the site, two interceptors and a connection to the sewer in the road outside of the site. IN the event of a fire the drain entry points will be covered with clay drain mats to prevent contaminated water entering the sewer system.

3.4 Water, Gas and Electricity

The site has a 50mm water supply. The site has a gas supply which serves the office central heating and water boilers. There is no gas supply to any operational areas. Electricity is provided to site via the sites own transformer.

4. SITE OPERATIONS

4.1 Waste Types

The range of wastes handled on site are described above in section 3.1 and Table 1 below. All the waste accepted at the site will be in accordance with the Environmental Permit for the site.

Table 1: List of Wastes

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	EWC code	Description of Waste
AR1 - Storage of hazardous waste	S5.6 A1(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes.	16 01 21*	Hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 1601 14 (catalytic converter containing RCF matting)
		16 08 07*	Spent catalysts contaminated with hazardous substances
		16 06 01*	Lead batteries
		16 06 02*	Ni-Cd batteries
		16 06 03*	Mercury containing batteries
		16 02 15*	hazardous components removed from discarded equipment
		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
AR2 – Treatment of hazardous catalytic convertors	S5.3 A1(a)(ii) Disposal or recovery of hazardous waste with capacity exceeding 10 tonnes per day involving physico-chemical treatment.	16 01 21*	Hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 1601 14 (catalytic converter containing RCF matting)
AR3 –	S5.3 A1(a)(ii)	16 06 01*	Lead batteries

Treatment of lead acid batteries	Disposal or recovery of hazardous waste with capacity exceeding 10 tonnes per day involving physico-chemical treatment	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
AR4 – Treatment of cable by granulation	S5.3 A1(a)(ii) Disposal or recovery of hazardous waste with capacity exceeding 10 tonnes per day involving physico-chemical treatment	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 (cables containing POPs)
		17 04 10*	Cables containing POPs only
AR5 – repackaging of hazardous waste	Section 5.3 (a) (iii) and (iv) - hazardous waste installation – blending or repackaging.	16 06 02*	Ni-Cd batteries
		16 06 03*	Mercury containing batteries
		16 02 15*	hazardous components removed from discarded equipment
		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
Directly Associated Activity			
AR6	Storage of processed materials, excluding temporary storage of hazardous waste under Section 5.6 A(1)(a)	16 01 17	Ferrous metal (end-of-life vehicle wheels)
		16 01 18	Non-ferrous metal (end-of-life vehicle wheels)
		16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15 (Printed Circuit Boards from end-of-life vehicles)
		16 06 04	Alkaline batteries (except 16 06 03)
		16 06 05	Other batteries and accumulators
		16 08 01	Spent catalyst containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)
		16 08 03	Spent catalysts containing transition metals or transition metal compounds not otherwise specified
		19 10 06	Other fractions other than those mentioned in 19 10 05 (shredded catalytic converters)
		19 12 02	Ferrous metal
		19 12 03	Non-ferrous metal
		20 01 34	Batteries and accumulators other than those mentioned in 20 01 33
AR7	Treatment of non- hazardous catalytic convertors	16 01 22	Components not otherwise specified (catalytic converter excluding those containing RCF matting)
AR8	Treatment of cable by granulation	16 01 22	Components not otherwise specified (end of life vehicle wiring looms)

		17 04 11	Cables other than those mentioned in 17 04 10*
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4.2 Waste Storage and Handling

The site will handle both hazardous and non-hazardous waste. The non-hazardous waste consists of the steel matrix CATs, alloy wheels, and wiring looms. The hazardous materials on site are ceramic matrix CATs and materials from them, lead-acid batteries, other batteries and wiring looms (containing POPs), which are classed as high-risk material and therefore will be processed and removed from site within 30 days. The non-hazardous material will be retained on site for a maximum of 60 days. A first in first out (FIFO) procedure is in place to ensure that stock rotation is in practise in order to remain in accordance with the retention time of one month. This will reduce the risk of the production of odour and dust. This will also ensure that stockpiles do not breach the size limits within the Natural Resources Wales guidelines and the Environmental Permit.

The table below illustrates the potentially combustible stockpiles on site and the maximum volume for each. As per the Environment Agency guidance, a 6m distance between stockpiles is preferable, however some stockpiles have been combined due to the lack of 6m distance and has been mirrored in table 2 below:

Table 2: Stockpile list

Stockpile Number	Material Type/Stockpiles	Form	Location	Maximum Amount in each area (m ³)
1	Alloy Wheels	Solid	Shed 1	24
2	Steel Shell CATs (in bags)	Solid	External Yard	32
3	Acid Tanks	Liquid	External Yard	50
4	Waste Plastic -40cyd Skip	Solid		30.58
				Total= 80.58
5	Granulated Copper (bagged)	Solid	Shed 2	90
6	Batteries (battery boxes)	Solid		60
7	Batteries (battery boxes)	Solid		160

8	Batteries (battery boxes)	Solid		160
				Total= 470
10	Copper Wire	Solid	External Yard	360
11	Mixed General Waste- 12cyd skip	Solid	External Yard	10.2
12	Alloy Wheels	Solid	External Yard	40
13	Cable	Solid	External Yard	12
14	Batteries (battery boxes, and ISO barrels)	Solid	Car Park- 3 x 20' ISO Container	3 x 7.98 = 23.96

4.3 Retention Times

The site will handle both hazardous and non-hazardous waste. The non-hazardous waste consists of the steel matrix CATs, alloy wheels, and wiring looms. The hazardous materials on site are ceramic matrix CATs, lead-acid batteries, and wiring looms (containing POPs), which are classed as high-risk material and therefore will be removed from site within 30 days. The non-hazardous material will be retained on site for a maximum of 60 days.

Material Risk Rating	Timescale
Low Risk Material (steel matrix CATs, alloy wheels, wiring looms)	Material will be retained for 60 days
Higher risk material (ceramic matrix CATs, lead-acid batteries, wiring looms (POPs))	Material will be retained for 30 days.

4.4 Pre-Acceptance Procedures

Prior to waste being brought onto site, customers who produce and deliver waste will be advised that the site will not accept any loads that contain EWC codes not specified on the list in Table 1. All loads are inspected at the client's site before being brought to site. This greatly reduces the risk of non-conforming wastes being delivered to site. Advising customers will significantly reduce the risk of non-conforming waste from entering the site.

4.5 Waste Acceptance Procedures

Waste reception and handling is subject to Site Working Procedures. Loads are inspected by site staff at the point of collection prior to being accepted. To ensure that the goods are of what is specified in the contract pre acceptance procedures are conducted.

Any non-conforming materials found in the waste will be dealt with in accordance with the rejecting waste procedures.

Wastes are handled in accordance with various requirements of the planning permission, the Environmental Permit, and the requirements of the end market.

4.6 Non-Conforming Waste

Every load brought onto site will be inspected by an operator. Any loads that contain non-acceptable materials will be rejected in accordance with the rejecting waste procedure.

Non-conforming materials found after entering the site will be segregated immediately and stored under suitable conditions before being dispatched to a suitable permitted facility.

If the same waste stream is regularly found to contain non-conforming materials, then a review of the acceptance procedures will be undertaken. This involves a discussion with the waste producer to resolve the issue and prevent any further occurrences.

If it is necessary, non-conforming loads shall be reported to the appropriate authorities.

4.7 Hazardous Waste

The site accepts hazardous in the form of ceramic matrix CATs due to the RCF found within them. Lead-acid batteries, batteries of some other chemistries and wiring looms containing POPs are also hazardous wastes that are accepted by the site. This waste is delivered by the site's own vehicles or third-party contractors. On arrival, all waste is inspected at the entrance by the site staff to ensure that the waste delivered to the site meets the following criteria:

- EWC Code on the waste transfer note conforms to the waste inside the container.
- Permit waste acceptance criteria – waste meets with the criteria of the environmental permit and the planning permissions for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.

If non-conforming hazardous waste is identified upon arrival, the load will be rejected immediately.

Once the waste has been accepted, it is sorted immediately to separate non-hazardous wastes from hazardous wastes- this is particularly important for CATs and wiring looms as both these wastes can be hazardous or non-hazardous.

4.8 Weighing Facilities

All waste received and despatched from site is weighed on the site weighbridge. Tonnages of materials handled will be recorded in accordance with Environment Agency guidance and shall be used to provide data for waste returns.

4.9 Operating Arrangements

The site operates a variety of mobile plant. A forklift truck is used for daily site activities and is stored in the designated plant storage area out of hours or when not in use.

4.10 Inspections & Maintenance

Company vehicles will be used to transport CATs to and from the site, with the occasional use of 3rd party contractor vehicles. The forklift truck is used for daily activities and is subject to a planned maintenance programme to minimise downtime and unplanned failures. A service planner is maintained to ensure that the required inspection and servicing is undertaken in a timely manner.

Routine inspections are carried out daily by the site manager and the company COTC holder. Where any damage is found, these shall be reported and repaired within the following set timescales:

- Vehicles – 48 hours
- Drainage – 7 days
- Buildings – 7 days

If this is not possible alternative arrangements shall be made as detailed below.

A site inspection will be carried out by the company COTC holder. The results are recorded on the site inspection sheet.

As a minimum the site inspection shall consider:

- Condition of the concreted area.
- Site access.
- Unit building condition (shutter doors, walls, roof).
- Waste records.
- Site tidiness/stockpiles.
- Litter, pests, mud, dust, and odour.

- Alarm and security system.

Any issues found will be dealt with promptly and within the timescales highlighted above. A review of site inspections shall take place at management meetings. Any trends identified will be discussed and action taken to address the issues.

4.11 Site Tidiness

The site will be inspected daily by the site manager and COTC holder. Any accumulated litter, debris or dust will be removed. The site access and concrete hard standing will be swept as necessary by a manual sweeper. If potential visible accumulations of debris are identified transferring to the public highway, a mechanical sweeper will be hire immediately to clean the highway.

Stockpiles will be maintained within the limits set out in the planning permission.

4.12 Site Security

The site has not experienced any trespass or vandalism in the last few years. The security system consists of 7 CCTV cameras and intruder sensors that are designed, installed, and maintained by a UKAS accredited installer. This system has been designed to conform to PD 6662:2017 (which is the UK implementation of the European Standard EN 50131), BS 8243:2010, and SSAIB Codes of Practice. The system is capable of generating Sequentially Confirmed Alarms, for the purposes of obtaining Police response. The primary notification (signalling) will be a Dualcom Digi Air GRADE 2 modem operating via GPRS. The modem will normally relay all alarm signals to an NSI Gold monitoring station that will filter out any false alarms and failures before passing the call direct to the police.

The system CCTV is monitored by a central station upon alarm activation. They will liaise with a member of the management team who will await further instructions whether police are required. The cameras can be viewed remotely by management 24/7. The locations of the CCTV cameras are shown on Drawing Ref: 230718BC101.

The detection/security systems used are proportionate to the nature and scale of the waste management activities carried out on site. The design, installation and maintenance of all automated systems are covered by an appropriate UKAS-accredited third-party certification scheme. The detection and security system installed on site will effectively contact site management and subsequently the police in the event of an intrusion.

4.13 Dust Control

It is crucial to note that the permitted area is entirely enclosed within the industrial unit building with an impermeable concrete surface. Due to the nature of the waste accepted on site, there is little potential for dust to accumulate.

Any visible accumulations of dusts on site will be removed by hand sweeping or by a mechanical sweeper. If visible accumulations of dust are transferred onto the public highway, then a mechanical sweeper will be hire immediately. Site staff inspect the site daily for accumulations of dust in accordance with a cleaning regime which is provided in Appendix 3.

The site operates in accordance key mitigation measures to reduce the risk of the spread of potential dust to neighbouring properties such as:

- Enforcing a strict speed limit of 5mph across the site.
- Minimising drop heights when unloading waste.
- Maintaining good housekeeping across the site.

If any complaints were to arise, the site will make every effort to reduce the risk of dust and respond to the complaint immediately. Any dust issues will be dealt with in accordance with site procedures.

4.14 Noise Management

There are sensitive receptors within 1km of the site, the closest being the residential properties located approximately 400m to the north. Due to the site being situated within an industrial location within a predominantly industrial/commercial and residential area, there are multiple other sensitive receptors as outlined in section 4.2.

The site operations are not considered to be noisy and are unlikely to cause an issue beyond the site boundary.

However, measures are taken to minimise noise generated by permitted operations.

As a result, certain limitations have been implemented which restricts operations to set hours. Noise generated by permitted operations will be controlled and minimised.

Measures taken to minimise noise are:

- Only operate during working hours.
- Switch engines off whilst unloading or waiting to unload.
- When not in use vehicles will be switched off.
- Noise complaints to be recorded and investigated.

Any problems with noise will be dealt with in accordance with procedure SWP009 (Appendix 5) of the Site Working Procedures Manual.

4.15 Odour Control

The nature of waste accepted on site means that odour is unlikely to become an issue. However, the following measures are put in place to minimise odours should they occur:

- Malodorous wastes are removed from the site for disposal at the earliest opportunity and are transferred to a suitable permitted facility.
- In the event of a spillage of any fluids on site, site management will be notified, and it will be dealt with in situ immediately. There are spill kits located on site in the storage unit building.

4.16 Litter Control

There is no risk of litter due to the type of wastes accepted on site.

In the event that litter does accumulate it will be dealt with in accordance with procedure SWP008 (Appendix 6) of the Site Working Procedures Manual.

The measures taken to minimise litter are:

- Restricting the inputs of wastes which can lead to litter.
- Litter pick will be carried out by a member of staff on site.

4.17 Pest Control

Due to the waste types accepted on site, it is unlikely that pests will become an issue as they do not provide a suitable habitat for pests. Also, wastes are stored in primarily sealed containers (either completely or from the base and sides) which will prevent pests. However, if an issue does develop the following measures will be taken:

- Use of commercial products.
- Use of a professional pest service.

If a waste is causing pest issues, then it will be removed from site immediately. This waste will not be accepted again until measures have been implemented to prevent pests.

Any evidence of pests will be dealt with in accordance with procedure SWP012 (Appendix 7) of the Site Working Procedures Manual.

4.18 Flood Risk

The site is located within an area classified Flood Risk Low, indicating that this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%) each year.

Due to the negligible risk of site flooding, the site area is appropriate for the operations of Blancomet Recycling Ltd. Furthermore, the fact that the operations are contained within the industrial unit, this will mean should flooding occur, the contents within the unit will not escape the site area.

5. CONTINGENCY PLANS

In the event of a fire at the site all operations on site would cease. No vehicles other than the Fire Rescue Service or Natural Resources Wales would gain access to the site due to control of the site gates by staff. Any waste loads or customers on their way to the site will be diverted away.

In the event of a flood all operations on site would cease. No vehicles other than the Fire Rescue Service or Natural Resources Wales would gain access to the site due to control of the site gates by staff. Flood sax barriers will be deployed by site staff.

6. ACCIDENT PREVENTION AND MANAGEMENT PLAN

Please refer to document Ref: B-2023-0001-Accident Management Plan for the detailed plan. The Accident Prevention and Management Plan was last reviewed in May 2025. The plan will be reviewed and updated annually or after any incident.

7. A CHANGING CLIMATE

Climate change means that extreme weather incidents are becoming more common and more severe. Climate projections show that over the coming decades we will face an increased risk of climate change impacts, including:

- extreme rainfall, leading to more frequent and severe floods
- heat waves
- drought
- rise in sea levels and tidal surges
- storms
- wildfires

All of these could have an impact the company directly, in supply chains and for consumers and markets. Potential impacts as a result of different likely climate change aspect are outlined below.

7.1 Summer Daily Maximum Temperature

Based on current figures, this may be approximately 7°C higher than typical summer temperatures, with the possibility for extreme temperatures of more than 40°C with increasing frequency.

Potential for increased waste reactions and fires

As Blancomet Recycling UK Ltd handles only handles CATs, wiring looms, lead-acid batteries, batteries of other chemistries and alloy wheels, there is a very low likelihood of a wastes reaction causing a fire. It is important to note, however, that the current operating manner of the site mitigates against the potential for increased waste reactions and fires due to waste operations occurring within the enclosed building. This building, therefore, will provide shade for the materials within the building, and minimise the effect of raising temperatures on the probability of a fire occurring.

Dry vegetation in and around hot cutting areas, leading to increased fire risk

This impact is negligible to the site as the entire site is surfaced with concrete or tarmac. Furthermore, all operations occur within the enclosed site building which will not have any potential for vegetation to grow.

Potential increase in high temperature expansion and stress of plant, pipework and fittings

During the daily operations of the site, mobile plant is crucial for the operations to occur. As outlined in section 5.8, routine site inspections are carried out daily by the site manager. Where any damage is found to infrastructure or plant and vehicles these shall be reported and repaired within the set timescales (outlined in section 5.8). Furthermore, the site mitigates against the risk of stress of plant through having a designated mobile plant storage area within the enclosed site building, which will help to mitigate the temperature exposed to the plant.

Potential increased dust emissions from processing areas and site roads

It is crucial to note that the permitted area is entirely enclosed within the industrial unit building with an impermeable concrete surface. Due to the nature of the waste accepted on site and the fact there is no treatment operations, there is little potential for dust to accumulate. The site operates in accordance key mitigation measures to reduce the risk of the spread of potential dust to neighbouring properties such as:

- Enforcing a strict speed limit of 5mph across the site.
- Minimising drop heights when unloading waste.
- Maintaining good housekeeping across the site.

If any complaints were to arise, the site will make every effort to reduce the risk of dust and respond to the complaint immediately. Any dust issues will be dealt with in accordance with site procedures.

7.2 Winter Daily Temperatures

This may be 4°C higher than the current average, with the possibility of greater extreme temperatures, both warmer and colder than what is experience today.

Increased risk of pipework freezing

Pipework freezing may cause leaks throughout systems in place at Blancomet Recycling. In order to combat this, insulating and provision of trace heating for exposed pipework will be reviewed should the pipework be affected. An inspection and maintenance regime is already in place, which will include checking any exposed pipes regularly.

7.3 Daily Extreme Rainfall

Daily rainfall intensity may rise by up to 20% from today's readings.

Potential for increased site surface water and flooding resulting in drainage systems and interceptors being overwhelmed

The permitted area is entirely indoors and therefore there is no concern regarding run-off from rainfall and therefore no site drainage is necessary. Any potential spillages will be dealt with appropriately within the permitted area using the spill kit that is provided on site.

No interceptor is present on site as the operations occur within the enclosed building, therefore the need for an interceptor is not required and there is no potential for any interceptors to be overwhelmed.

7.4 Average Winter Rainfall

Winter rainfall may increase by more than 40% compared to current norms.

Potential for increased site surface water and flooding

The site is located within a Flood Zone 1, indicating that the land is assessed as having a 1 in 1000 or greater annual probability of river flooding (<0.1%). This ultimately means the existing drainage in place is suitable for the area and the site operations that occur.

Potential for drainage systems and interceptors to be overwhelmed

The permitted area is entirely indoors and therefore there is no concern regarding run-off from rainfall and therefore no site drainage is necessary. Any potential spillages will be dealt with appropriately within the permitted area using the spill kit that is provided on site.

No interceptor is present on site as the operations occur within the enclosed building, therefore the need for an interceptor is not required and there is no potential for any interceptors to be overwhelmed.

7.5 Sea Level Rise

Sea level rise which could be as much as 0.6m higher compared to today's level.

If a site is located near the coast there is potential increased risk of flooding

Blancomet Recycling UK Ltd is located within Cardiff, Wales. Despite being relatively close to the sea, the site is located in a low-risk area in regard to flood risk from the sea. This is due to the area having flood defences in place against potential sea level rise.

7.6 Drier Summers

Summers could see potentially up to 40% less rain than now.

Potential increased use and reliance on mains water for dust suppression, cleaning and fire water

The site does not rely on mains water for dust suppression, therefore there is no reliance on mains water for this purpose.

Fire water comes from the fire hydrant located approximately 119m to the southeast of the site entrance on Penarth Road. It is the responsibility of the Fire and Rescue service to ensure that the hydrants conform to the British Standards to ensure that in the event of a fire, it can be put out effectively with the use of the hydrant.

Potential increase in dust emissions from a site

It is crucial to note that the permitted area is entirely enclosed within the industrial unit building with an impermeable concrete surface. Due to the nature of the waste accepted on site, there is little potential for dust to accumulate. The site operates in accordance key mitigation measures to reduce the risk of the spread of potential dust to neighbouring properties such as:

- Enforcing a strict speed limit of 5mph across the site.
- Minimising drop heights when unloading waste.
- Maintaining good housekeeping across the site.

If any complaints were to arise, the site will make every effort to reduce the risk of dust and respond to the complaint immediately. Any dust issues will be dealt with in accordance with site procedures.

7.7 River Flow

The flow in the watercourses could be 50% more than now at its peak, and 80% less than now at its lowest.

There is potential increased impact of discharge to watercourse from on-site drainage systems where connected to water courses

The site does not discharge its surface water into any river system.

Increased risk of watercourse flows being too high to allow discharge and drainage backing up on site

The site does not discharge its surface water into any river system.

7.8 Storms

Storms could see a change in frequency and intensity. The unique combination of increased wind speeds, increased rainfall, and lightning during these events provides the potential for more extreme storm impacts.

Storms and high winds could damage building structures with increased potential for fugitive emissions

Should a storm and high winds occur, the site operates within the enclosed buildings. This may impact the way in which Blancomet Recycling UK Ltd operates should the storm cause any building damage. It is important to note, however, that in accordance with the site inspections and maintenance inspections, where any damage is found, it shall be reported and repaired within 7 days. If this is not possible, alternative arrangements shall be made which are outlined in section 5.10.

8. PERSONNEL AND DUTIES

The site is operated by various personnel with discrete duties and responsibilities. A management structure is shown in Appendix 1 below.

Technically competent management is available on site. A copy of the CV and WAMITAB certificate of the COTC holder is kept on site.

9. STAFF COMPETENCE AND TRAINING

Site management is responsible for ensuring that all operatives are appropriately trained in the moving, organising and storage of waste and any other activities that are carried out on site by the operatives. Training is carried out in the form of toolbox talks.

Operatives are responsible for carrying out all daily operations. All training that is carried out on site will be recorded in either site folders, site diaries or on a computer spreadsheet. Training will be carried out annually and involve a refresher on all the relevant planning and permitting documents.

10. RECORDS

Maintenance, inspections, and all other related records will be kept inside the site office in either folders or on a spreadsheet on a computer.

The permit itself will remain within the site building, with a digital copy stored on the site computer, and by management. Should, for whatever reason, the physical copy not be accessible for interested parties, the numerous electronic copies will ensure that the permit will be able to be viewed when requested.

11. SITE CONDITION REPORT

1.0 SITE DETAILS	
Name of the applicant	Blancomet Recycling UK Ltd
Activity address	Opal Way, Stone Business Park, Stone, ST15 0SS
National grid reference	SJ 90301 32008
Document reference and dates for Site Condition Report at permit application and surrender	1) 2508 - Site Condition Report

Document references for site plans (including location and boundaries)	1) 241021BS101
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2.0 Condition of the land at permit issue	
Environmental setting including:	The site is an Industrial Estate on former farmland to the south west of the town of Stone.

<ul style="list-style-type: none"> • geology • hydrogeology • surface waters 	<p>The earliest available OS maps show that a clay marl pit was present in the NE part of the site (currently the gates and weighbridge area) from at least 1880 up to the 1959 OS map. The first evidence of Industrial development is the sewage works some 110m to the north of the site which There are records of an historic landfill immediately to the north of the sewage works at a similar time which is presumably associated with the sewage works.</p> <p>Development of the industrial estate occurred over a long period from 1979-1990. The two marl pits on the edge of the site disappeared from the OS Record in 1979. There is no record of historic landfill in this location which would indicate that the site was levelled around this time. The site location itself became used for industrial purposes in 1996 and completed its development by 2000 according to Historic OS maps. Previously the site has been occupied by a single occupant, Delice de France which was a food preparation company.</p> <p>The site is not located within a Groundwater Protection Zone and has 1 abstraction zone approximately 750m south-east of the site.</p> <p>The nearest surface water course is the Trent, located 800m North-east of the site.</p>
<p>Pollution history including:</p> <ul style="list-style-type: none"> • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination • evidence of damage to pollution prevention measures 	<p>There are no Environment Agency recorded pollutions incidents associated on-site, or in the immediate area, that may have affected the land.</p> <p>The historical Ordnance Survey (OS) maps do not reveal any use of the site other than agricultural fields with small scale marl extraction until sometime between 1996 and 2000, when the site was developed in its current form.</p> <p>The current use is considered unlikely to caused contamination as the raw material comprises a solid waste, consisting of metals, deposited onto a sealed concrete surface within a building.</p> <p>The building has no internal drainage and the concrete surface has been maintained in good condition. As such, no pollution pathways to soils, surface water or groundwater exist.</p> <p>Externally the site is entirely covered in concrete and those areas handling wastes are drained to sewer via an interceptor.</p>
<p>Evidence of historic contamination, for example, historical site investigation,</p>	<p>No previous historical site investigation data or reports are available.</p>

assessment, remediation and verification reports (where available).	
Baseline soil and groundwater reference data	NA
Supporting information	None

3.0 Permitted activities	
Permitted activities	As per Environmental Permit KP3439JU - Recycling of scrap catalytic converters, cable, lead acid batteries, batteries of other chemistries and other metals
Non-permitted activities undertaken	Business administration.
Document references for: <ul style="list-style-type: none"> plan showing activity layout; and environmental risk assessment. 	241021BS101 2508 - ERA

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	No
Have there been any changes to the permitted activities?	Yes, new waste stockpile 14 in ISO containers in car park
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No
Checklist of supporting information	<ul style="list-style-type: none"> 2508 - Non-Technical Summary

5.0 Measures taken to protect land

The site is surfaced entirely with concrete (or tarmac on car park) and drains to sewer via an interceptor> As such no pollution pathways exist or have existed to soils, ground or surface water.

Checklist of supporting information

6.0 Pollution incidents that may have had an impact on land, and their remediation

There have been no pollution incidents, or spillages.

Checklist of supporting information

7.0 Soil gas and water quality monitoring (where undertaken)

The site was developed from farmland around 25 years ago. Since that time, it was a food business before becoming a waste recycling plant in 2017. As there was no previous contamination from the former activities and no pollution pathways existed or now do exist for contamination it has not been considered necessary to monitor soils or groundwater.

Checklist of supporting information

12. FIRE CONTROL AND PREVENTION MEASURES

Mains water is available on site. A fire hydrant is available near to the site which has a sufficient supply of water for firefighting purposes.

There are a number of AFFF foam fire extinguishers on site that will be used in the early stages of a fire by staff that are trained in the use of fire extinguishers. The storage areas ensure ease of access in the early stages of a fire.

Fire prevention will be practiced by the site operating in accordance with the Fire Prevention Plan Ref: BS.PT.FPP.2508 and through good housekeeping.

13. COMPLAINTS

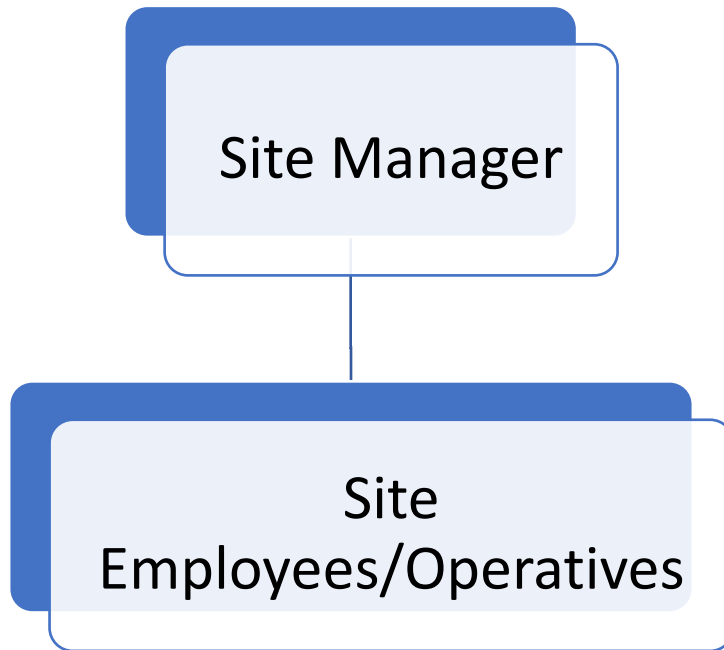
Any complaints received shall be dealt with in accordance with the procedure SWP002 Complaints Procedure (Appendix 8) of the Site Working Procedures Manual.

14. REVIEW OF THE SYSTEM

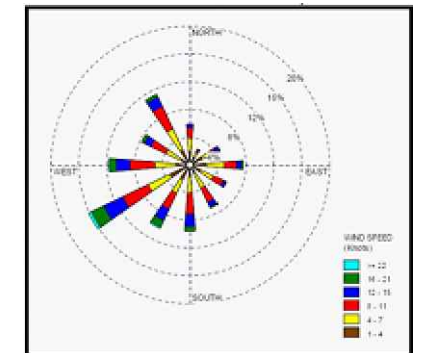
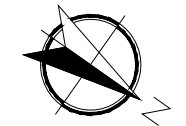
A review of the Environmental Management System shall take place in response to any incidents or accidents and annually on or around the anniversary of the System. The review shall be carried out by site management and the findings recorded. Any defects, shortfalls, or changes to the system shall be recorded and the system amended accordingly.

At each review staff will receive training in the form of toolbox talks to highlight any changes.

APPENDIX 1 – MANAGEMENT STRUCTURE



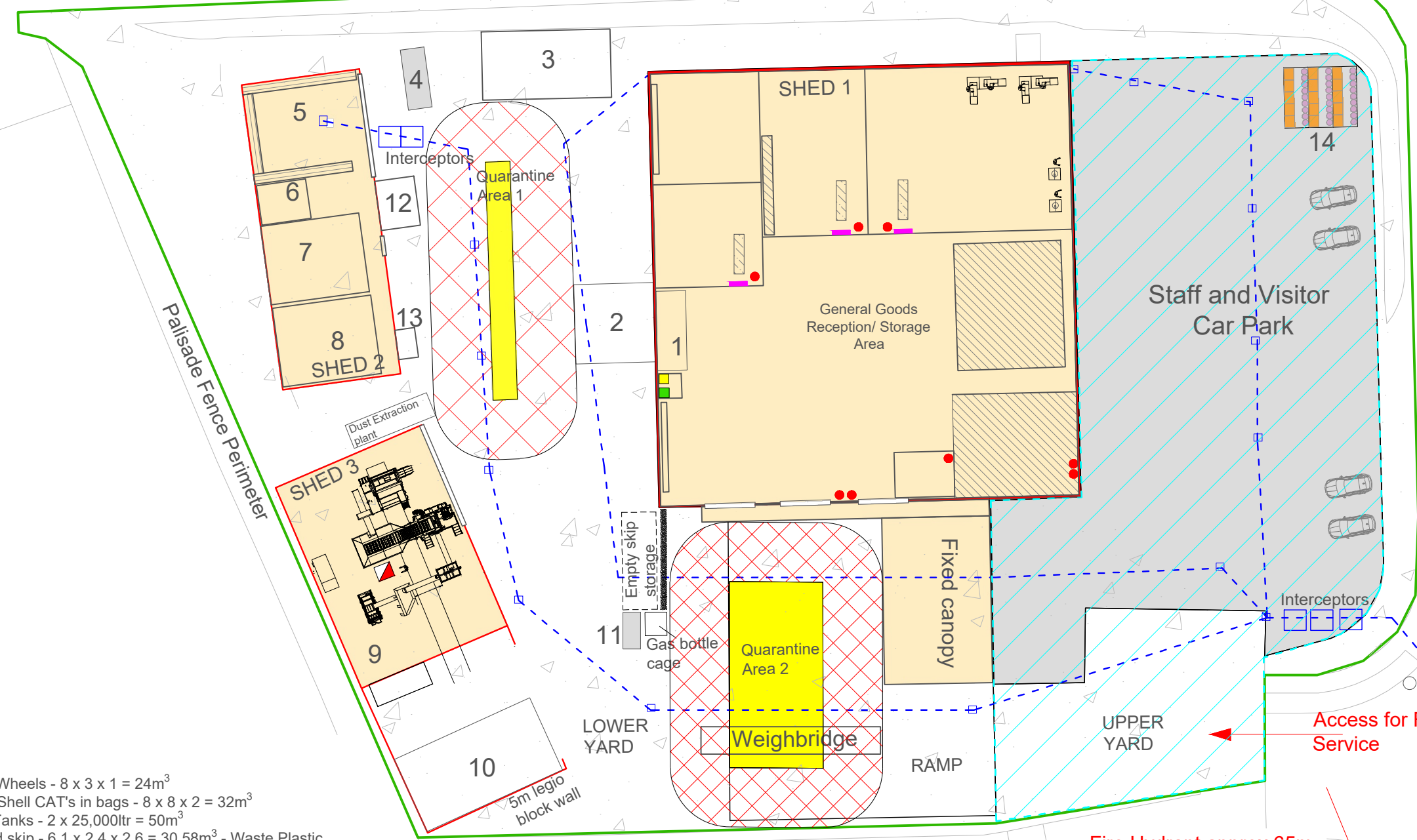
APPENDIX 2 – DRAWING REF: 241021BS101



JASPER WAY

Palisade Fence Perimeter

OPAL WAY



1. Alloy Wheels - 8 x 3 x 1 = 24m³
2. Steel Shell CAT's in bags - 8 x 8 x 2 = 32m³
3. Acid Tanks - 2 x 25,000ltr = 50m³
4. 40 cyd skip - 6.1 x 2.4 x 2.6 = 30.58m³ - Waste Plastic
5. Granulated Copper (bagged) 30 x 3 x 1 = 90m³
6. Batteries in Battery Boxes - 5 x 4 x 3 = 60m³
7. Batteries in Battery Boxes - 10 x 8 x 2 = 160m³
8. Granulated Copper (bagged) - 10 x 8 x 2 = 160m³
9. Granulating Plant
10. Copper Wire = 15 x 8 x 3 = 360m³
11. Mixed General waste in 12cyd skip - 3.7 x 1.78 x 1.68 = 10.2m³
12. Alloy Wheels - 4 x 5 x 2 = 40m³
13. Cable (Bagged) - 2 x 3 x 2 = 12m³
14. 3x 20' ISO Container- 6.1 x 2.44 x 2.59
 (5 x Battery Boxes - each 1.2 x 1 x 1 = 1.2m³ total = 6m³) (x4)
 (9 x ISO Barrels - each 0.935 high x 0.581 diameter = 220ltr total = 1.98m³)(x4)

Quarantine Area 1 = 58m²
 Quarantine Area 2 = 177m²
 Total = 235m²

Fire Hydrant approx 65m
 (see drawing number 241021BS102 for Location)

- Automatic Fire Extinguisher
- Fire Extinguisher
- Leaderstop
- Public Surface Water Gravity Sewer
- Transferred Gravity Sewer
- Water Main
- Spill Kit
- PPE Storage
- Tarmac
- Concrete
- Upper Yard

CLIENT
 BLANCOMET RECYCLING UK LTD

SITE
 Opal Way
 Stone Business Park
 Stone
 ST15 0SS

PROJECT PERMIT APPLICATION			
TITLE FIRE PREVENTION PLAN			
SCALE @A3 1:500	DATE Nov 2025	DRAWN BY T Kearns	CHECKED BY D Alcock
DRAWING NO 241021BS101		REVISION	

REV	DATE	DETAIL



APPENDIX 3- SWP007

Site Working Procedure – Mud / Debris Control			
SWP007			
Issue:	1	Date:	03/10/2025
Written/Revised By:	David Alcock	Approved By:	Edward Manzano

1. Purpose

- 1.1 To ensure a nuisance is not created by mud escaping onto the highway.

2. Responsibility

- 2.1. It is the responsibility of the site manager to ensure this procedure is implemented & followed.

3. Control Measures

- 3.1 The site access road and concreted areas are to be swept on a regular basis, as required following a visual inspection or at least once monthly. In the event of mud / debris being carried onto the road, the site manager must be informed immediately.
- 3.2 A sweeper is to be employed as soon as possible, ensure that the highway is kept mud / debris free.
- 3.3 If a sweeper is unavailable, surface cleaning operations and wheel cleaning operations of outgoing vehicles is to be undertaken using a hose and brush.
- 3.4 Under no circumstances must vehicles leave the yard with mud / debris on their wheels, subsequently carrying mud / debris on the highway, which is an offence under Highway and Waste Management Legislation.

4. Reporting & Records

- 4.1 Incidents of mud on the highway shall be noted in the site diary and incident log book.
- 4.2 Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 4- SWP015

Site Working Procedure – Site Rules			
SWP015			
Issue:	1	Date:	03/10/2025
Written/Revised By:	David Alcock	Approved By:	Edward Manzano

1. Purpose

1.1. To ensure the safe and efficient operation of the site.

2. Responsibility

2.1. The site manager has ultimate responsibility to ensure that the requirements of this procedure are met. All site staff have day to day responsibility.

All personnel using the site have responsibility to ensure that operational and site rules are adhered too.

3. Access to Site

3.1 No unsupervised access allowed on site. All visitors must report to the site manager.

3.2 Operating times are as displayed on the fencing / entrance to site.

3.3 No waste to be left outside the site when closed.

4. Vehicles Entering Site

4.1 All vehicles must observe the 4 MPH speed limit at all times.

4.2 No overtaking is allowed, if there is a vehicle unloading, visitors must wait until it is safe to proceed as directed by the site operative

4.3 Priority must be given to vehicles leaving site.

4.4 Care must be taken at all times and extreme caution be taken in regard to potential pedestrian and the roadways leading to the site.

4.5 All visitors must report to the site manager and follow their instructions.

4.6 Appropriate P.P.E, including high visibility clothing, must be worn at all times and be suitable for the waste being handled.

- 4.7 All vehicles to have hand brakes applied and engines switched off whilst queuing to enter site or unloading.
- 4.8 All vehicles reversing must be supervised by the site operative or other appropriate personnel.
- 4.9 All paperwork must be completed **before** tipping waste, **“NO PAPERWORK NO ACCESS TO FACILITY”**.

5 Full Skip Removal

- 5.1 Ensure safety lock tip hooks are free and operating properly
- 5.2 Do not tow out skips using the tip hooks or tube as anchor points.
- 5.3 Do not drag out skips using a single chain or lift arm.
- 5.4 Skip wagons must securely locate the lift chains when travelling without a container.
- 5.5 When lifting or placing a skip the following must apply;
 - The vehicle is aligned to the skip being picked up
 - Hand brake is applied
 - Stabilisers are used
 - There is a clear space around the skip wagon
 - All personnel are safely clear
 - The container is in good condition
 - The rear wheels are kept in contact with the ground
 - That under no circumstances does any personnel stand, pass beneath a suspended skip
 - Full skips are covered with netting/sheeting to prevent escapes

4. Reporting & Records

- 4.1 Any incidents to be noted in the site diary and incident log book.
- 4.2 Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 5- SWP009

Site Working Procedure – Noise Minimisation			
SWP009			
Issue:	1	Date:	03/10/2025
Written/Revised By:	David Alcock	Approved By:	Edward Manzano

1. Purpose

1.1 To ensure a nuisance is not created by operational noise.

2. Responsibility

2.1. It is the responsibility of site manager to ensure this procedure is implemented & followed.

3. Noise Control Measures

3.1 As a result of the Noise survey, certain practices are to be adopted to minimize noise generated by permitted operations. These include fitting closed engine covers to all machinery and using effective silencers and alarms.

3.2 Other measures to be taken are

3.2.1 Vehicles and plant are only to be operated within the site within normal working hours.

3.2.2 Vehicles must switch engines off whilst unloading or waiting to unload.

3.2.3 Suppression to be used on any plant operated in the site to lower noise transmission and to reduce vibration.

4. Reporting & Records

4.1 Incidents of unusual or excessive noise occurring to be noted in the site diary and incident log book.

4.2 Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 6- SWP008

Site Working Procedure – Litter Control			
SWP008			
Issue:	1	Date:	03/10/2025
Written/Revised By:	David Alcock	Approved By:	Edward Manzano

1. Purpose

1.1 To ensure a nuisance and / or a legal breach is not created by the escape of light waste (Litter)

2. Responsibility

2.1. It is the responsibility of the site manager to ensure this procedure is followed.

3. Litter Control Measures

3.1 All site personnel to be vigilant and check for litter arising from the site’s operation.

3.2 The following measures are to be implemented:

- All light loads on vehicles / skips stored on the yard are to be netted.
- Light wastes, paper, cardboard etc to be kept secure in designated waste reception areas or containers.
- In the event of the escape of litter around the site, litter picking operations to be undertaken immediately.
- PPE consisting of boots, gloves, helmet, high visibility vest or coat to be worn by all site personnel undertaking litter-picking operations.

4. Reporting & Records

4.1 Incidents of litter to be noted in the site diary and incident log book.

4.2 Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 7- SWP012

Site Working Procedure – Pests & Weeds			
SWP012			
Issue:	1	Date:	03/10/2025
Written/Revised By:	David Alcock	Approved By:	Edward Manzano

1. Purpose

1.1 To ensure a nuisance is not created and to fulfill the requirements of the environmental permitting regulations.

2. Responsibility

2.1. It is the responsibility of site manager to ensure this procedure is implemented & followed.

3. Pest & Weed Control

3.1 The site is to be inspected for pests and weeds as part of the normal inspection regime

3.2 Complaints or reports of problems from neighbours or visitors to be investigated.

3.3 Any evidence of pests to be dealt with by specialist licensed pest control provider.

3.4 Any treatment of vermin or insects shall be in accordance with requirements under the Control of Pesticides Regulations 1986 (COPR -Amended 1997)

3.5 Weeds and vegetation to be kept down to a minimum and to be preventing from spreading into neighbouring gardens.

3.6 Any invasive weed species to be dealt with by specialist licensed vegetation control provider.

4. Reporting & Records

4.1 Incidents of pests or weeds causing a problem to be noted in the site diary and incident log book.

4.2 Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 8- SWP002

Site Working Procedure – Pre Acceptance & Acceptance checks
SWP002

Issue:	1	Date:	02/10/2025
Written/Revised By:	David Alcock	Approved By:	Edward Manzano

1. Purpose

- 1.1 To ensure that only wastes of the correct type and quality are delivered to site, to maintain quality control throughout the processing system and to reduce the production of waste at site. To ensure compliance the site's environmental permit and planning permission

2. Mobile buyers

- 2.1 Inspection - Our mobile buying team will drive to various sites to grade and purchase catalytic converters and batteries. They have been fully trained to comply with their work instructions in accordance with legislative and organizational requirements.
- 2.2 **Catalytic converters.** Each Catalytic converter is inspected by the mobile buyer to ensure that the metal casing is not pierced or breached in anyway. If it is, then it will be rejected as the ceramic containing precious metal might have fallen out putting at risk delivery and site staff and also giving the mobile buyer an incorrect grading price. Any fixings attached to the catalytic converter that are flammable such as rubber hanger (used to attach the catalytic converter to the chassis of the car) will either be rejected or the part removed and correctly disposed of at the client's site prior to being accepted into our facility.



If all is well then the consignment note or duty of care paperwork is completed and the load accepted for dispatch.

- 2.3 Grading & Loading - Each Catalytic converter is graded and priced depending on its value of precious metal. The price is given to the client and if agreed then the catalytic converters are weighed and placed in the container within our company vehicle. Invoices are produced by the seller and payment is made.
- 2.4 Batteries are inspected by mobile buyers on the supplier site to assess condition, chemistry and packaging to ensure that the load will be acceptable at site. If all is well then, the consignment note, or duty of care paperwork is completed and the load accepted for dispatch.

If any issues are identified such as unsuitable packaging, poor condition and/or damage, or incompatible chemistries then the load will be rejected at the suppliers' site and will not be

delivered to our site.

3. Consignment Note & Waste

- 3.1 Collected catalytic converters and batteries may be classed as hazardous waste. If there is any doubt about the hazardous nature of the waste e.g. presence or otherwise of RCF matting, then a consignment note must be used to move hazardous waste. A consignment note must stay with the hazardous waste until it reaches its final destination.

4. Unloading at Site

- 4.1 Before the vehicle is unloaded at our facility the delivery paperwork e.g. Duty of Care note or consignment note is brought to the weighbridge supervisor who will visually check the load prior to acceptance.
- 4.2 If the load matches the delivery paperwork with then the vehicle is weighed and the load is accepted and the appropriate boxes filled in on the consignment note, if applicable.
- 4.3 If anything is not correct, such as paperwork is incomplete, packaging or waste damaged or the load does not match the description on the paperwork then the load will be directed to the quarantine area pending a further inspection.
- 4.4 Any loads which are temporarily Quarantined in this way will be subject to inspection by the site supervisor or manager. Such inspection will consider why the load has been quarantined with a view to deciding if the load can be dealt with on site, e.g. by removing non-conforming materials from the wastes and rejected only the non-conforming materials, by making changes to the paperwork to better describe the waste and so on.
- 4.5 Ultimately the site supervisor or manager will make a decision as to whether the site can accept the load, or part of the load or whether the entire load shall be rejected

5. Reporting & Records

- 5.1 Any incidents or breaches of this procedure are to be noted in the site diary and incident log book.
- 5.2 Any incident or breach of this procedure must be reported immediately to the site manager.
- 5.3 Any incidents of rejected loads shall be discussed at site management meetings and decision taken on any follow up actions which may be necessary.