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| Document Reference | CUP-OP06 Recording Procedure |
| Version: | 1.1 |
| Adopted by: | European Metal Recycling Limited |
| Procedure Supersedes: | V1.0 |
| Authorised by: | Mark Brookes |
| Date Issued: | 30/01/2024 |

| Version History | | | |
|------------------------|-----------------------|-------------|---|
| Version | Type of Change | Date | Description of Change |
| 0.1 | N/A | 14/07/2021 | Initial Draft |
| 0.2 | N/A | 18/10/2021 | WRM review |
| 1.0 | Update | 30/01/2024 | Update following Infrastructure Changes |
| 1.1 | | 03/05/2024 | Update with EMR business name after acquisition |

Purpose

This document aims to outline the procedure which must be followed by European Metal Recycling Limited (hereon referred to as EMR) to ensure the site fulfils the requirements of its Environmental Permit conditions with regard to records.

Procedure Overview

The procedure document details the record-making requirements that EMR carry out, in line with their environmental permit. It has been split into its component parts for ease of reference. Conditions to be applied are also indicated below.

Scope of Site Records

EMR proactively create records in line with environmental and processing aspects in accordance with the site's Environmental Permit conditions. All records are kept for a minimum of 3 years. The table below provides an overview of all areas covered within the scope of this schedule.

Table 1. Records

| Record Aspect | Record to be Made | Frequency | Responsibility | Recording Location | Stored |
|----------------------------------|---|--|----------------------------|---|---|
| Staffing & Visitors | | | | | |
| Staff, visitors, | Names of visitors / operators and times of attendance on site | Daily | Operators, Site management | Weighbridge and main Office | Weighbridge & Main Office |
| Site Inductions | All visitors and staff inducted | Prior to entering processing area | Site management | Main office | Site electronic files / Filing cabinet. |
| Staff training | Training matrix + any relevant documentation | Ongoing | Site management | Main office | Site electronic files / Filing cabinet. |
| Accidents & Incidents | | | | | |
| Fire | Any incident of fire | As soon as possible following a fire | Site management | Site Diary, H,S&E meeting / minutes and site investigation | Site Office, E copy and Notice Boards |
| Accidents | Any accident on site | Directly following any accident. | Site management | Accident book and report plus H,S&E meeting / minutes | Site Office, E copy and Notice Boards |
| Litter | Any incident other than expected | As soon as possible following an event | Site management | Site Diary, site investigation plus H,S&E meeting / minutes | Site Office, E copy and Notice Boards |
| Dust | Any incident | As soon as possible following an event | Site management | Site Diary, site investigation plus H,S&E meeting / minutes | Site Office, E copy and Notice Boards |
| Noise & Odour | Any incident | As soon as possible following an event | Site management | Site Diary, site investigation plus H,S&E meeting / minutes | Site Office, E copy and Notice Boards |

| Record Aspect | Record to be Made | Frequency | Responsibility | Recording Location | Stored |
|-----------------------------|---|------------------------------|------------------------------|--------------------------------------|---------------------------|
| Waste Records | | | | | |
| Waste acceptance | Tickets/Documents waste transfer notes | On receipt of incoming waste | Site Operatives | Weighbridge / site recording systems | Weighbridge / Site Office |
| EWC compliance | Non conformance reported | On receipt of incoming waste | Site Operatives / management | Weighbridge / site recording systems | Weighbridge / Site Office |
| Waste rejection | Complete waste rejection form | As needed | Site Operatives / management | Weighbridge / site recording systems | Weighbridge / Site Office |
| Tonnages | At entry to site | daily | Site Operatives | Weighbridge / site recording systems | Weighbridge / Site Office |
| Material processed | On site SAP system | daily | Site management | site recording systems | Site Office |
| Non conformance | Entry in site diary | As needed | Site Operatives / management | Weighbridge / site recording systems | Weighbridge / Site Office |
| EA waste returns | EA reporting spreadsheet | Quarterly / yearly | Site management | site recording systems | Site Office |
| Monitoring | | | | | |
| Site Drainage System | Inspection, maintenance, and monitoring of pollution prevention methods | Weekly | Site Manager | Site Diary | Site Office |
| Dust from extraction system | emissions monitoring report | Annually | Site Manager | Monitoring report | Site Office |
| Litter control | Daily record of completion | Daily | Site operators | Site Diary | Weighbridge |

| Record Aspect | Record to be Made | Frequency | Responsibility | Recording Location | Stored |
|--|---|---|------------------------------|--|-------------|
| Pest control | Weekly inspection | weekly | Site operators | Site Diary | Weighbridge |
| Condition Checks, Faults & Breakdowns | | | | | |
| Mobile Machinery | Any machinery breakdown or failure, pre-use checks, servicing | ad-hoc, prior to use, annual service etc. | Site operators | Site Diary, machinery logs, maintenance sheets | Site Office |
| Static Machinery | Any machinery breakdown or failure, pre-use checks, servicing | ad-hoc, prior to use, annual service etc. | Site operators | Site Diary, machinery logs, maintenance sheets | Site Office |
| Plant oils, water leaks | Record of spillage and actions taken | ad-hoc, prior to use, annual service etc. | Site Operatives / management | Site Diary, machinery logs, maintenance sheets | Site Office |
| Concrete pad, storage bays and offices | Visual inspection as part of daily checks | daily | Site Operatives / management | Site Diary, site maintenance sheets | Site Office |
| Complaints | | | | | |
| Public | Details of complaint | Ad-Hoc basis | Site Manager | Site Diary | Site Office |
| Staff | Details of complaint | Ad-Hoc basis | Site Manager | Site Diary | Site Office |

Roles and Responsibilities

Site Supervisors and Operatives:

Report to the management team, any environmental and processing aspect that becomes a concern to the site EA permit in accordance with the site's Environmental Permit conditions. All records shall be kept for the duration of the site licence.

EMR Management Team:

Ensure all staff are trained in site procedures and reporting of any events that becomes a concern to the Environmental Permit conditions.

Ensure all recordable events are recorded and that records are tracked and maintained.

Ensure that the EA permit conditions are maintained and records kept and reported where applicable.

