



**EUROPEAN METAL RECYCLING LIMITED
DARLASTON
Heath Road
Darlaston, West Midlands
WS10 8XL**

EPR/GP3292FT

ENVIRONMENTAL MANAGEMENT PLAN

June 2022

Introduction

European Metal Recycling Limited (EMR) is the largest UK metals recycling company and operates many licensed metals recycling sites throughout the country. EMR specialises in the recovery and recycling of scrap metals from industry, commerce and householders.

The registered office is:

European Metal Recycling Limited
Sirius House
Delta Crescent
Westbrook
Warrington WA5 7NS

Registered in England and Wales No. 2954623

The Darlaston site accepts both ferrous and non-ferrous materials. Processes on site include (but are not limited to) shredding, baling and sorting. The site has two entrances, one from Heath Road and the other from Bentley Road South. All entrances have radiation detectors and weighbridge facilities.

The refrigeration unit processing plant is set within the Darlaston Depot described above. The following environmental management plan forms part of the environmental management system implemented on site.

SECTION WP 1 SPECIFIED WASTE MANAGEMENT OPERATIONS

1.1 Summary of the process

The permitted activities on site consist of:

- R3 Recycling/reclamation of organic substances which are not used as solvents,
- R4 Recycling/reclamation of metals and metal compounds,
- R5 Recycling/reclamation of other inorganic materials,
- R13 Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

This includes:

- a. **Acceptance:** Acceptance & rejection of materials through the weighbridges.
- b. **Storage:** Storage of waste refrigeration unit pre & post inspection, ferrous metals and non ferrous metals.
- c. **Inspection:** Checking the condition of material and removal of standard and non standard items with no liquid pollution potential.
- d. **Treatment** (ferrous/non-ferrous metals): Consisting of sorting, separation, grading, shearing, shredding, baling, compacting, crushing, granulating and cutting for the purpose of recovery.
- e. **Pre-treatment (refrigeration units):** Cleaning of and removal of standard and non standard items with a liquid pollution potential.
- f. **Treatment Stage 1 (refrigeration units):** Drainage and storage of refrigerant and lubricant from the refrigeration units.
- g. **Treatment Stage 2 (refrigeration units):** Processing of refrigeration units in a contained environment for the removal of insulating foam blowing agent.
- h. **Storage:** Storage of residual wastes and materials.

1.2 Summary description of the waste management operations

The activity on site is the treatment of controlled waste for the purpose of recycling. Further details of the specified waste management operations permitted are found in the environmental permit.

The European Waste Catalogue (EWC) codes for materials accepted at this site and permitted quantities of residual materials/wastes are listed below:

EWC Chapter	Sub-section	Waste Code
Fridge Processing Plant (25,000 Total Maximum Annual Tonnage)		
16 Wastes not otherwise specified in the list	16 02 Wastes from electrical and electronic equipment	16 02 11* Discarded equipment containing CFCs, HCFC and HFC
		16 02 13* discarded equipment containing hazardous components other than those mentioned in 16 02 09 and 16 02 12
		16 02 14 Discarded equipment other than those mentioned in 16 02 09 and 16 02 13
		16 02 16 Components removed from discarded equipment other than those mentioned in 16 02 15
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 23* Discarded equipment containing chlorofluorocarbons
		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 36 Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 36.
Metal Recycling Facility (75,000 Total Maximum Annual Tonnage)		
02 Waste from agriculture, horticulture, aquaculture, forestry, hunting and fishing	02 01 Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing	02 01 10 Waste metal
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 Ferrous metal filings and turnings
		12 01 03 non ferrous metal filings and turnings
15 Waste packaging, absorbents, filter materials, wiping cloths and protective clothing not otherwise specified	15 01 Packaging (including separately collected municipal packaging waste)	15 01 04 Metallic packaging
16 Waste not otherwise specified in the list	16 01 End of life vehicles from different means of transport and wastes from dismantling of end of life vehicles and vehicle maintenance	16 01 06 end of life vehicles containing neither liquid nor other hazardous components
		16 01 17 Ferrous metal
		16 01 18 Non ferrous metal
		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.
	16 01 22 Discarded components not otherwise specified	
	16 06 Batteries and accumulators	16 06 01* Lead batteries
		16 06 03* Mercury containing batteries
		16 06 04 Alkaline batteries (except 16 06 03)
16 06 05 Other batteries and accumulators		

EWC Chapter	Sub-section	Waste Code
17 Construction and demolition wastes (including excavated soil from contaminated sites)	17 04 Metals	17 04 01 Copper, bronze, brass
		17 04 02 Aluminium
		17 04 03 Lead
		17 04 04 Zinc
		17 04 05 Iron & steel
		17 04 06 Tin
		17 04 07 Mixed metals
19 Wastes from waste management facilities, off site waste water treatment plants and preparation of water intended for human consumption/industrial use	19 01 Wastes from incineration or pyrolysis of waste	19 01 02 Ferrous material removed from bottom ash
	19 10 Wastes from shredding of metal containing wastes	19 10 01 Iron and steel waste
		19 10 02 Non ferrous waste
	19 12 Wastes from mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	19 12 02 Ferrous metal
		19 12 03 Non ferrous metal
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 Lead batteries*
		20 01 40 Metal

1.3 Site layout plan

A site plan is available upon request.

SECTION WP 2 SITE INFRASTRUCTURE

2.1 Provision of Site Identification Board

A site identification board will be displayed at the site entrances with details of the following information:

- Site name and address;
- Permit Holder name;
- Operator name;
- Permit number;
- Emergency contact name and telephone number;
- Statement that the site is permitted by the Environment Agency;
- Agency national numbers for general enquiries and emergencies;
- Days and hours site is open to receive waste.

In the event that the board is damaged or information needs updating, a new board will be ordered and fitted within one month.

2.2 Site security

The building within which the fridge destruction process will take place has several access points, some of which can be secured by the use of lockable roller shutter doors. The site benefits from closed circuit television throughout. Additionally, a security guard is employed to patrol when the site is closed.

The Fridge Plant and Non Ferrous Compound are located within the Darlaston depot, which has boundary security comprising of steel palisade fencing, brick walls, earth bunding and lockable gates. The Walsall Canal borders the site to the southern boundary and a main line railway to the north.

The building security will be fully inspected at the commencement of each working day. Any defects shall be made secure by temporary repair by the end of the working day and shall be repaired within seven days of the damage being detected. All inspections, defects, damage and repairs will be recorded in the site diary.

2.3 Lighting

The site benefits from a comprehensive lighting system, illuminating all working areas when necessary.

All defects, damage and repairs will be recorded in the site diary.

SECTION WP 3 SITE ENGINEERING FOR POLLUTION PREVENTION AND CONTROL

3.1 Engineered site containment and drainage systems

3.1.1 Impermeable Site Surfaces

Storage of refrigeration equipment will take place within the building as well as outside the processing building as demonstrated on the site plan. This area also benefits from impermeable surfaces as well as a sealed drainage system.

Residual materials/wastes and used pollution abatement materials will be stored in such a manner as to prevent the leakage potentially polluting liquids onto the impermeable pavement by utilising and maintaining suitable storage containers.

All non ferrous metal is stored on impermeable pavement served by the same sealed drainage system as the fridge plant is connected to which includes an oil interceptor fitted with a penstock valve.

The impermeable pavement will be maintained to prevent fluids running off the pavement and prevent the transmission of fluids through the pavement or joints.

All inspections, defects, damage and repairs to the impermeable pavement/ sealed drainage will be recorded –in the site diary.

3.1.2 Sealed Drainage Systems

The site benefits from a sealed drainage system complete with oil interceptor and penstock valve. Discharge is into Walsall Canal.

The sealed drainage system includes, concrete pavement, concrete sills to divert water away from areas of hardstanding down gradient of storage areas and containment fencing at the perimeter of the yard along the Walsall Canal. Damage to the perimeter fencing causing a reduction in the containment of runoff/ firewater will be repaired within a suitable time frame at most within two weeks. Liquid in the drainage system is treated through catchpits to remove solids and an interceptor the discharge to Walsall Canal from which is fitted with a penstock.

3.1.3 Bunded Areas

The compressors removed following the first stage treatment will be contained and stored within a bunded area under cover.

No batteries will be stored outside. No raw material liquids with the potential to cause pollution will be stored outside in the non ferrous yard unless they have appropriate secondary containment. There is a double skinned diesel tank external to the fridge plant. In the event of a spill from the diesel tank spill kit is available to prevent the diesel entering the drainage system.

3.1.4 Maintenance Schedules

Daily pre-use check sheets are used for all equipment on site and submitted to Management weekly. Additionally, certain wear parts and monitoring equipment will require regular maintenance.

Any maintenance tasks will be documented in the site action log. Any contractors working on site will be documented in the site diary.

The sealed drainage to the fridge plant and non ferrous yard is inspected regularly and documented inspections are made monthly. Cleansing of the drainage and interceptor is carried out at a frequency deemed required by risk assessment.

SECTION WP 4

SITE OPERATIONS

4.1 WASTE ACCEPTANCE AND HANDLING

4.1.1 Waste acceptance

Vehicles arriving at the site enter the main gates through Exploranium radiation detectors and drive onto the weighbridge. At this point, the load is checked visually for its suitability for processing at the site and checked against the description of the load provided on the waste transfer note/weighbridge ticket. In the event that unacceptable wastes are discovered at this point, the vehicle shall be rejected from site – unless it is radioactive waste in which case it will be suitably quarantined and the RPS contacted for further instruction.

If the materials are determined as acceptable by this initial inspection, the vehicle is directed to a suitable area to discharge its load. The offloading areas may vary depending upon various factors such as stocking levels and health and safety. Once the load is off loaded, the materials are again inspected by the off-load inspector to determine whether any unacceptable materials are present. Should unacceptable materials be observed at this point, they will be returned to the vehicle and rejected from site or quarantined on site. The vehicle driver and customer are notified of the reasons for the rejection; photographs may be taken for documentation purposes. Radio communications are maintained between weighbridge and yard inspectors during the acceptance of waste at the site.

Refrigeration units will be off-loaded by forklift truck. During unloading, the units will be counted in and a written record of time, date, quantity and type will be maintained.

Once a load has been off loaded, inspected and deemed as acceptable, the vehicle is cleared to return to the weighbridge where the weight of the material tipped is determined.

4.1.2 Non-conforming wastes

In the event that non-conforming materials are detected after initial inspections, these will be segregated on discovery and quarantined in an appropriate area. An assessment will be made of the properties of the waste and if necessary specialist advice obtained regarding handling and disposal. Details of non-conforming materials will be recorded in the Site Diary.

Turnings will be kept undercover where quantities allow. Larger quantities of turnings will not be accepted at the facility the subject of this permit, but at the adjacent non ferrous yard in their purpose built turnings bay.

4.1.3 Hazardous Wastes

The site only accepts those wastes detailed in section 1.2. All hazardous wastes accepted at the site will only be accepted with the appropriate consignment paperwork in accordance with the hazardous waste legislation and industry guidance. These wastes will then be stored in appropriately engineered areas. Lead acid batteries will be stored undercover in the non ferrous shed.

Any contravening hazardous wastes discovered in loads will be isolated and, where possible, traced back to their source supplier. If the source of the hazardous waste cannot be ascertained, then the waste will be quarantined until it can be safely treated on site or until it can be removed from the site for reprocessing or disposal at a suitably permitted facility.

4.1.4 Wastes Containing Liquids

The site only accepts those wastes specified in section 1.2. Whilst accepting wastes containing liquids (other than refrigeration units) is not likely, should they be found they will be segregated and stored in suitably engineered areas before it is removed from site for disposal at an suitably permitted facility. Lead acid batteries will be stored inside the non ferrous shed. Acid neutralisation granules are stored close to the battery storage area to use in the event of an acid spill/ leak from the batteries.

4.1.5 Pressurised Containers

Gas cylinders and pressurised containers are not knowingly accepted at the site. Should such items be discovered later among material waiting processing they will be segregated and placed in a designated appropriately signed container prior to collection or decommissioning by an appropriately authorised contractor. Records of the collection of gas cylinders shall be retained in the site diary or Environmental folders.

4.1.6 Waste sampling and testing

The site's waste acceptance criteria do not routinely require wastes accepted to be subject to sampling or testing.

4.1.7 Waste quantity measurement systems

The designated weighbridge is located inside the Heath Road entrance to the main Darlaston site. A further weighbridge is available, if necessary, inside the Bentley Road South entrance.

In the case of power failures or other weighbridge malfunction, weight estimation will be provided based on the calculation of tonnage versus volume for loads that cannot be weighed. The site may also rely on volume measurement information for items such as liquids removed from site by contractors.

The following conversion table will be used to calculate the weight of refrigeration units accepted:

Table 4.1 Refrigeration Unit Conversion Table

Unit Type	Weight
Small domestic type refrigerator or freezer with 180L capacity or less.	25 kg
Medium domestic type refrigerator, freezer or fridge/freezer with 180-350L capacity	40 kg
Large domestic type refrigerator, freezer or fridge/freezer with 250-500L capacity	60 kg

4.1.8 Storage of specified wastes

Residual wastes will be removed from site for re-processing or disposal in accordance with company procedure.

Removals of residual wastes or materials will be recorded and with a copy of the Duty of Care Transfer Notes, Hazardous Waste Consignment Notes and Annex VII paperwork are kept on site. This will indicate the size of containers removed in the case of sealed containers, such as those

used for compressor oil and refrigerants or the weight of the waste/material when weighed on the Darlaston depot weighbridge in the case of general wastes, metals, foam and plastics.

Cable removed from refrigeration equipment (waste electrical and electronic equipment (WEEE)) has been deemed by the Environment Agency to contain POPs. This type of cable must be stored separately from other types of cable and cannot be recycled. The plastic coating (containing POPs) must be destroyed.

POPs containing cable must be stored in bags under cover on an impermeable surface connected to the sealed drainage system. The storage area must be clearly labelled as 'POPs containing cable'.

The location of this storage area is identified on the site plan.

POPs containing material is classified as hazardous waste therefore associated duty of care regulations apply and material must travel with a consignment note.

4.1.9 [Specified waste treatment process] – plant, equipment and procedures

The specified waste treatment process on site is the destruction of waste refrigeration units for the purpose of recycling. The following section outlines the processes and methods used:

4.1.9.1a Pre-treatment:

Within two days of arrival on site, and prior to treatment, all units will be checked for items which require removing. Note: this site will only process Pentane units. All CFC units will be transferred to another EMR Fridge Plant for processing.

In the reception area the units will be checked. Any CFC units will be transferred to the quarantine area. Remaining Pentane units will have the following removed –

- Trays / glass shelves. (Plastic trays main remain)
- Power cable
- Door Seals
- Organics
POP's Plastic – These may be removed on the degassing line.

If items that pose a health and safety risk to operatives are discovered the unit will be taped up and placed in the quarantine area for disposal at a suitably permitted facility. This may include broken glass, and other sharp objects. Such units will be disposed of within 7 days of their being placed in the quarantine area.

There are two inclined infeed conveyors in the reception area. Once fridges are checked they will be laid on infeed conveyor and feed up to and into the logistics area. From here the fridges will pass to an inspection area on a horizontal conveyor, where a robot will detect what blowing agent the carcass and doors have been made with. Three measurement points will be taken per fridge. If VFC's are detected, the fridge will be rejected and sent down a reject conveyor line. These will be sent to another EMR Fridge Plant with the others previously identified and quarantined.

4.1.9.1b Treatment

First stage degassing

After the robot and passing the inspection stage, the fridges will pass into the degassing area, where operators will remove any POP's plastic (if not already done so) as well as capacitors and then prepare the fridges for degassing. Fridges will be scanned for size and type at a data monitoring station. Compressor data will be manually inputted by operator (Present / missing). Fridges are to be degassed using a suction head and drill. The oil/gas mixture will be sent to the Stage 1 processing equipment to separate out the gasses and oils. The Plant has the ability to collect R134a Refrigerant and this will be collected separately in a bottle for offsite disposal. R600a (Pentane) will be recovered and sent to the RTO. The operator will then release the fridge to the next section. Degassed fridges will have the compressors removed, manually.

Second stage de-gassing

The fridges will advance forward automatically and then be conveyed to the elevator tower and prior to the shredding process. To ensure compliance, there will also be a hand scanner at this stage to check the doors / panels and to ensure pentane insulation only is processed. When ready the conveyor will push the fridge forwards into the air lock chamber. The door closes behind the fridge. There is a pusher that continuously slides up and down within the shredder and this assists the fridge in being processed through the blades of the shredder.

There is a fire protection system within the shredder. There is a foam dispensing system that assists with minimising dust that is produced from the shredded fridge. Nitrogen is injected to inert the atmosphere as well.

From there the outputs from the shredder are sorted and separated in an enclosed atmosphere where necessary.

The pentane gas will be collected from the shredder and pelletizing area and sent to the RTO system.

4.1.9.1e Process capacity, expected throughput

The treatment process for refrigeration units has a throughput of no more than 25,000 tonnes per year.

4.1.9.2 Treatment process for refrigeration panels

4.1.9.2a Pre-treatment:

Refrigeration panels will be tested to determine the type of refrigerant contained within the foam. Once this has been ascertained, panels will be cut to a suitable size using a reciprocating saw.

4.1.9.2b Treatment:

Once cut, the panels will be processed in a confined atmosphere as soon as possible. See 2nd Stage Degassing description in section above.

SECTION WP 4 SITE OPERATIONS

4.2 CONTROL OF POTENTIALLY POLLUTING LEAKS AND SPILLAGES

4.2.1 Liquid storage

Loading and unloading of waste refrigeration equipment shall be undertaken in a manner that will prevent damage of the units.

Compressors removed during the treatment process will be contained and stored under cover within a bunded area served by a sealed sump.

Containers used for the storage of refrigerants, compressors and compressor oil will be inspected regularly for leaks. Containers found to be leaking shall be immediately transferred to a larger over container or shall have their contents transferred to an alternative container immediately.

All inspections, defects, damage and repairs will be recorded in the site diary.

4.2.2 Procedures for control and remediation of leaks and spillages

Any minor spillage will be cleaned up immediately utilising absorbent materials available on site.

Where a potentially polluting spillage has occurred, immediate action will be taken to prevent the spillage entering surface water drains, watercourses or contaminating unsurfaced ground. The spillage shall be cleaned up using absorbent materials and placed in sealed containers and the Environment Agency shall be informed.

Any potentially polluting incident will be recorded in the site diary.

4.2.3 Equipment and materials for cleaning up leaks and spillages

Absorbent materials shall be made available at all times to deal with spillages and its location made known to all operatives. Any contaminated absorbent materials will be disposed of at a suitably permitted facility.

Acid neutralisation granules are available close to the battery storage area in the non ferrous shed to neutralise any leaked battery acid escaping from the acid resistant battery boxes in which the batteries are stored.

4.2.4 Wastes Containing Liquids

The site only accepts those wastes specified in section 1.2. Whilst accepting wastes containing liquids (other than refrigeration units) is not likely, should they be found they will be segregated and stored in suitably engineered areas.

SECTION WP 4 SITE OPERATIONS

4.3 GENERAL

4.3.1 Control of mud and debris

The site benefits from a substantial impermeable pavement, therefore mud and other debris are unlikely to be tracked onto the road from inside the site. The internal surfaces are swept by mechanical sweeper twice a week.

Vehicles moving materials/wastes from site are sheeted where necessary and inspected prior to leaving site to ensure the load is secure.

4.3.2 Fires on site

The site benefits from two 30,000 litre and one 50,000 litre firewater tanks fitted with hoses and hand held and mobile fire extinguishers located throughout. All operatives are trained to know the location as well as how to use the fire extinguishing equipment during their induction. To contain firewater, the penstock valve will be closed and the water will be held in the sealed area and removed off site after the fire has been extinguished.

All treatment within the Stage 2 of the fridge plant operation will be completed one unit at a time in an enclosed atmosphere which is constantly monitored for flammable levels.

Stocks of residual materials stored on site will be stored with appropriate fire breaks according to their combustibility and flammability with reference to the fire prevention plan guidance. There are very few non ferrous grades that are considered to be combustible. The waste types stored on site with the potential for combustion are batteries, plastic, foam, fridges and refrigerant gases.

In the event of a fire, immediate action will be taken. If the fire can be contained, then the fire extinguishers located around the building will be deployed to fight the fire. Any large fires will be dealt with by evacuating the building and ringing the local Fire Brigade immediately.

The Environment Agency will be notified of incidents/accidents which significantly affects or may affect the environment and incidents/accidents will be recorded in the site diary.

4.3.3 Control, monitoring & reporting of dusts, fibres and particulates

All residual materials/wastes are contained within suitable containers or bays to avoid pollution to the atmosphere and nuisance to neighbouring sites. All other particulates are enclosed within the process plant.

A maintenance program is in place for the cleansing of the fridge plant. Dust and foam is removed from areas of accumulation at the end of each shift. A deep cleanse of the plant is carried out on a risk assessed frequency but is carried out at least every year.

4.3.4 Control of odours

Any food wastes found within the refrigeration units will be removed upon arrival and stored in the lidded skip available on site. This waste is removed from site once the skip is full. Daily odour monitoring will take place and will be documented in the site diary.

4.3.5 Control and monitoring of environmental noise

The plant will be monitored during its trials to ascertain the need for noise protection/abatement on site.

The site shall record and investigate any complaints received in the site diary and Environmental Folders.

4.3.6 Control of pest infestations

Any food wastes found within the refrigeration units will be removed upon arrival, sealed in black bags and stored in the lidded skip available on site. This waste is removed from site when the skip is full.

A specialist pest control contractor regularly visits site to monitor for the presence of pests. Any attendance (and/or actions taken) of contractors on site will be recorded in the site diary.

4.3.7 Control of litter

Any litter generated inside the fridge processing building is unlikely to become wind-borne. Any litter present is collected and placed in a suitable container on site.

The Non-ferrous Compound does not knowingly accept waste types that are likely to become airborne and escape from site.

The boundaries of the site are inspected regularly and any litter present is collected. Inspections along with any actions taken are recorded in the site diary.

4.3.8 Site Closure

In the event that the site needs to close/ cease accepting waste fridges will be diverted to EMR Willesden where there is another fridge destruction plant.

Closure may be triggered by a range of reasons from bad weather to lengthy breakdown. Other than the storage requirements of the permit, any decision about plant closure will be made on the basis of safety as to whether fridges can continue to be accepted.

In the event that the fridge plant or any part of the installation has to cease operating permanently residual waste materials without value will be removed compliantly. A site investigation will be completed and the details for conducting the investigation will be agreed in advance with the Environment Agency.

SECTION WP 5 POLLUTION CONTROL, MONITORING AND REPORTING

5.1 Monitoring and reporting for [specified gases, vapours and aerosols]

5.1.1 Monitoring of Fridge Destruction Standards

The plant shall be operated and maintained so that the specified standards in Table 5.1 below are met.

Table 5.1 Standards for fridge destruction

Residual materials	Specified standards
Metal	The quantity of foam remaining on the granulated metal after processing shall not exceed 0.5% w/w
Plastic	The quantity of foam remaining on the granulated plastic after processing shall not exceed 1% w/w
Polyurethane foam	The quantity of residual blowing agent remaining in the polyurethane foam shall not exceed: (a) 0.5% w/w where foam is stored in a contained environment subject to further recovery or destruction. (b) 0.2% w/w in other cases.
Waste water	All waters generated from the processing of the refrigeration unit shall be collected and stored in a sealed container to prevent fugitive emission of controlled substances prior to disposal.

5.1.2 Commissioning plan and validation procedures

At the onset of the refrigeration destruction processing, the plant was commissioned and a commissioning report was produced containing the following information:

- a. Types and numbers of units destroyed;
- b. Quantity of blowing agent collected;
- c. Results of residual material sampling;
- d. Quantities of residual material generated;
- e. Record of the emissions monitoring systems and
- f. Details of identity, qualifications and experience of persons providing validation report.

5.1.3 Continual emissions monitoring

The plant installed benefits from an emission monitoring system. More detail will become available once installed.

5.2 Groundwater monitoring and reporting systems

The handling of waste material and processed metals on site is not considered to pose a significant risk or direct linkage to ground waters due to the engineering and operations containment systems that have been put in place.

In line with environmental permit condition 3.5.5 groundwater periodic monitoring shall be carried out at least once every 5 years and soil every 10 years unless such monitoring is based on a systematic appraisal of the risk of contamination.

5.3 Point source emissions & Process monitoring

Point source emissions monitoring will be conducted in line with table S3.1 in Schedule 3 of the environmental permit.

Process monitoring will be conducted in line with table S3.3 in Schedule 3 of the environmental permit.

5.4 Surface water monitoring and reporting

The handling of waste material and processed metals on site is not considered to pose a significant risk to surface waters due to the nature of the materials handled on site and the engineering and operations containment systems that have been put in place.

Visual monitoring of the water discharged into the Walsall Canal will be conducted weekly. Records will be kept in the site office.

5.5 Monitoring of meteorological conditions

Weather conditions will be monitored by visual observation.

Records will be maintained in the site diary of any meteorological conditions that adversely affect the sites' operations such as high wind and any steps taken to mitigate the effects.

SECTION WP 6 SITE RECORDS

6.1 Security and availability of records

The company will maintain site records at the locations specified in Table 6.1 below. These locations shall be deemed to meet the Environment Agency's requirements in that they will be within easy daily/routing access of the Environment Agency area office for the site.

The site offices and document storage facilities will be maintained in such a manor as to provide a location that will keep documents secure from loss, damage or deterioration for the statutory periods that they must be retained.

6.2 Records of waste movements

Site records of waste movement will be maintained through the retention of hard copies of normal weighbridge tickets, hazardous waste consignment notes, Annex VII paperwork and transfer notes from servicing contractors removing waste oils, absorbent materials etc.

This information will be retained in at the following locations for the following specified time periods:

Table 6.1 Retention and availability of records

Records	Location	Retention Time Period
Weighbridge tickets	On site	6 years
Incoming hazardous waste consignment notes	On site	6 years
Out going consignment notes and transfer notes from servicing contractors removing contaminated liquids, absorbents and waste oils	On site	6 years
Electronic Records	Head Office (Warrington) Server – with national access for any authorised site and user.	Electronic records commenced in 1999 long term retention time scales indefinite for year end recorded data

6.3 Site Diary

The site diary will be kept in the site office and shall be maintained by the Site Manager or those operatives which the Site Manager delegates its maintenance to. Other similar documents and information recording systems may also be maintained.

6.4 Periodic Reporting of Environmental Performance

The performance efficiency and residual waste from the processing plant will be submitted at the end of every quarter to the local inspection officer in the format appended to the permit.

The tonnage waste returns for the storage area will be submitted at the end of the year to the National Waste Returns Department of the Environment Agency in the agreed format.

6.5 Additional Records, Safe Working Procedures, Risk Assessments and Emergency Procedures

In addition to the statements and procedures detailed within this working plan, the site may also implement and retain additional environmental protection procedures, safe working procedures, risk assessments and emergency plans within the site files which are reviewed every two years or in the event of a process change.

In accordance with the Group Environmental Policy, EMR has an environmental management system in place to ensure effective management of environmental aspects, with the objective being that any environmental impacts are minimised or negated completely.

SECTION WP 7 MANAGEMENT AND STAFFING OF OPERATIONAL SITE

7.1 Technically Competent Management

Waste materials shall only be accepted and processed when the site is supervised by an experienced member of staff who is familiar with the contents of the site's permit and working plan.

A copy of the permit and management plan shall be available at all times while the site is operational.

The site shall have appropriate technically competent management. Arrangements for cover will be made during holidays.

7.2 Training requirements

The Site management have attended environmental and technical competence courses specific to the metal recycling industry.

Staff will be trained in environmental awareness & procedures as outlined in their given job roles. .

Site management benefit from support from SHE Specialists team at all times.

Changes in regulatory requirements will be communicated to staff via Regional Environmental Staff and Managers.

