

# Monitoring Procedure

FEN-OP05

<b>Document Reference</b>	FEN-OP05 Monitoring Procedure
<b>Version:</b>	1.1
<b>Adopted by:</b>	Fenix Battery Recycling Ltd
<b>Procedure Supersedes:</b>	N/A
<b>Authorised by:</b>	Miles Freeman
<b>Date Issued:</b>	15/02/2021

Version History			
Version	Type of Change	Date	Description of Change
0.1	N/A	01/02/2021	Initial Draft
0.2	Review	09/02/2021	Internal Review
1.0	First Issue	15/02/2021	First Issue
1.1	Amendment	20/05/2021	Reference to Point Source Emissions on Alkaline Process Line and the Acid Storage Tanks

Copyright ©

All material on these pages, including without limitation text, logos, icons and photographs, is copyright material of WRM Limited. Use of this material may only be made with the express, prior, written permission of WRM Limited. This document was produced solely for use by the named contractee to whom the document refers.



## 1.0 PROCEDURE OVERVIEW

This procedure document details the routine and periodic monitoring requirements required by Fenix Battery Recycling Ltd (hereon referred to as Fenix) in line with their Environmental Permit. The procedure has been split into component parts for ease of reference by site operatives.

## 2.0 SCOPE OF SITE MONITORING

Fenix shall proactively maintain the work environment and site infrastructure in accordance with the site's Environmental Permit conditions. Table 1 itemises the scope of the site's monitoring commitments.

**Table 1. Monitoring Requirements**

Monitoring Aspect	Monitoring to be Undertaken	Frequency	Responsibility	Subsequent Action
<b>Environmental</b>				
Dust	Visual inspection as part of the daily check.	Daily	Site Operators	Dampening and extraction systems used. Regular sweeping of the site's hard surfaces and roads.
Litter	Visual inspection as part of the daily check.	Daily	Site Operators	Remove litter to sealed refuse containers. If litter has blown into neighbouring property, then inform the site manager.
Pests	Ongoing watching brief for the identification of any pest infestations will be part of the daily routine for site operatives.	Daily	Site Operatives	Seek professional advice from suitably qualified pest controller and record subsequent action within site diary.
	An inspection of the facility for pest infestations shall be carried out at weekly intervals by the site manager.	Weekly	Site Manager	
Surface Water Drainage System	Visual inspection as part of the weekly check.	Weekly	Site Manager	Fenix to repair where possible otherwise appoint a 3 <sup>rd</sup> party to repair.
Odour	Sniff tests.	Daily	Site Manager	Investigate cause of pollution and take action to stop it.
Mud/loose Waste	All vehicles leaving areas of the site which are operational or upon which engineering works are being carried out shall, before leaving the site, be checked for mud and cleaned as necessary, and shall be checked to	Every load	Site Operatives	Clean vehicle as necessary. If deposited on highway: <ul style="list-style-type: none"> <li>The affected public areas outside the site shall be cleaned/swept.</li> <li>The cause of the mud/debris escape investigated.</li> </ul>

Monitoring Aspect	Monitoring to be Undertaken	Frequency	Responsibility	Subsequent Action
	ensure that they are clear of loose waste.			<ul style="list-style-type: none"> <li>Measures shall be taken to clear any such sources as soon as practicable.</li> </ul>
Impermeable Surface	Visual inspection as part of the weekly check.	Weekly	Site Manager	Fenix to repair where possible otherwise appoint a 3rd party to repair.
Site Bunding	Visual inspection as part of weekly checks.	Monthly	Site Manger	Fenix to repair where possible otherwise appoint a 3rd party to repair.
Noise	Noise checks.	Daily	Site Manager	Investigate cause of excessive noise and take action to mitigate it.
Point Source Emissions to Air of Dust and Ammonia	<p>External monitoring of flue on Alkaline process line dust extraction system and carbon filter.</p> <p>Monitoring for dust is to be conducted to EN 13284-1 Standard.</p> <p>There is no applicable EN Standard for NH3 monitoring. BAT guidance (Best Available Techniques (BAT) Reference Document for Waste Treatment 2018) therefore states '<i>If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.</i>'</p>	Once every 6 months	MCERTS Certified Third Party Company	<p>If dust is elevated, investigate the extraction system to identify the cause. If changes are required to the equipment, contact supplier to arrange this.</p> <p>If Ammonia is elevated, investigate the carbon filter to identify the cause. If changes are required to the equipment, contact supplier to arrange this.</p>
Point Source Emissions to Air of SO2	<p>External monitoring of scrubber exhaust which serves the acid storage tanks.</p> <p>Please note, there is no mention of SO2 monitoring in BAT guidance (Best Available Techniques (BAT) Reference Document for Waste Treatment 2018) so the most applicable methodology to conduct</p>	Once every 6 months	MCERTS Certified Third Party Company	If SO2 is elevated, investigate the scrubber system to identify the cause. If changes are required to the equipment, contact supplier to arrange this.

Monitoring Aspect	Monitoring to be Undertaken	Frequency	Responsibility	Subsequent Action
	the monitoring shall be agreed with the third party company who are selected to undertake the monitoring.			
<b>Process Monitoring</b>				
Waste Transfer and Treatment	To be undertaken in line with <i>OP02 – Waste Acceptance Procedure</i> and <i>OP03 – Waste Treatment Procedure</i> .	As indicated in in line with <i>OP02 – Waste Acceptance Procedure</i> and <i>OP03 – Waste Treatment Procedure</i>	Site Manager Site Operatives	Corrective Action as indicated <i>OP02 – Waste Acceptance Procedure</i> and <i>OP03 – Waste Treatment Procedure</i> .
Waste Storage Containers/Bins	Check adequate labelling and information is available. Ensure all materials are labelled at all times.	Daily	Site Manager	Report any problems with identification and sorting of materials and arrange for labels to be put in place.
Liquid Storage/Holding Tanks.	Visual inspection as part of the daily check.	Daily	Site Manager	Fenix to repair where possible otherwise appoint a 3 <sup>rd</sup> party to repair.
Liquid Storage/Holding Tanks.	Water testing every 6-12 months.	Bi-annual	Site Manager	Fenix to repair where possible otherwise appoint a 3 <sup>rd</sup> party to repair.
<b>Infrastructure</b>				
Lighting	Visual inspection as part of the daily check.	Daily	Site Operatives	Fenix to repair where possible otherwise appoint a 3 <sup>rd</sup> party to repair.
Fencing	Visual inspection as part of the daily check.	Daily	Site Operatives	Fenix to repair where possible otherwise appoint a 3 <sup>rd</sup> party to repair.
Dust extraction system and carbon filter on alkaline process line.	As per manufacturer's guidelines.	As per manufacturer's guidelines.	Site Manager	Fenix to repair where possible otherwise appoint a 3 <sup>rd</sup> party to repair.
Wet scrubber system on acid storage tanks.	As per manufacturer's guidelines.	As per manufacturer's guidelines.	Site Manager	Fenix to repair where possible otherwise appoint a 3 <sup>rd</sup> party to repair.

### 3.0 ROLES AND RESPONSIBILITIES

**Site Operatives Shall:**

- Undertake monitoring of parameters assigned to them by the Site Manager as per the instructions in this procedure.

**The Site Manager Shall:**

- Be responsible for ensuring all required monitoring is undertaken and recorded;
- Ensure that site operatives have the required training to carry out monitoring activities as required;
- Oversee the implementation of any corrective actions required to address any issues identified through the daily checks.

**WRM Limited**  
18 Manor Square, Otley, West Yorkshire, LS21 3AY

Tel: 01943 468138

Email: [info@wrm-ltd.co.uk](mailto:info@wrm-ltd.co.uk) Web: [www.wrm-ltd.co.uk](http://www.wrm-ltd.co.uk)

**Copyright and Non-Disclosure Notice**

**Copyright ©**

All material on these pages, including without limitation text, logos, icons and photographs, is copyright material of WRM Limited. Use of this material may only be made with the express, prior, written permission of WRM Limited. This document was produced solely for use by the named contractee to whom the document refers.

The contents and layout of this report are subject to copyright owned by WRM (©WRM Limited), save to the extent that copyright has been legally assigned by us to another party or is used by WRM under licence. To the extent that we own the copyright in this report, it may not be copied or used without our prior written agreement for any purpose other than the purpose indicated in this report.

The methodology (if any) contained in this report is provided to you in confidence and must not be disclosed or copied to third parties without the prior written agreement of WRM. Disclosure of that information may constitute an actionable breach of confidence or may otherwise prejudice our commercial interests.



**A Sustainable Future. Today.**

[www.wrm-ltd.co.uk](http://www.wrm-ltd.co.uk)

01943 468138