



PERMIT

WORKING PLAN

For

1st Choice Vehicle Dismantlers

Scrap Vehicle Storage & Dismantling Facility

Units 12 & 13
Martin Road
Tremorfa Industrial Estate,
Rover Way
Cardiff, CF24 3SD.

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SECTION 1. GENERAL INTRODUCTION

- 1.1. '1st Choice Vehicle Dismantlers' was established in March 1987 and purchased by the present owner - Mr. Malcolm Harrison - in 1989. The Company relocated to its present site on the Tremorfa Industrial Estate in March 1997. owner
- 1.2. Consequently, Mr. Harrison has long experience of the metal recycling business and in particular the specialist activity of vehicle dismantling. He will become the Licence Holder for the facility and provide the necessary technically competent management. experience
- 1.3. Waste management operations at the site are limited entirely to the activity of dismantling accident damaged and scrap vehicles for the sale of used parts to the trade and to the public, and shells to the metal recycling industry for recovery of non-reusable ferrous and non-ferrous components. Many of the suppliers are well known to 1st Choice, providing scrap vehicles of reliable quality. dismantling
scrap vehicles
- 1.4. Not all vehicles delivered to the site are 'waste' and some 30% may be classified as 'runners' and sold for re-use either with, or without repair. Similarly, some 90% of tyres and some 80% of batteries removed from vehicles are of such good quality that they may be sold for immediate reuse without the need for further treatment. These are clearly not 'waste' and fall outside the requirements of the Waste Management Licensing Regulations 1994. % of waste
- 1.5. To support the operations the Company utilises a recovery vehicle, a mobile crane and a mechanical excavator. These are maintained in good condition at all times in accordance with the manufacturers' recommendations. on site
plant
- 1.6. Essentially, therefore, the Company conducts an environmentally sustainable waste management activity whilst also providing a most valuable service to the community. The operations are fully in accordance with the Government's current preferred strategy for dealing with waste materials. community
service
- 1.7. Nevertheless, the Company recognises that without proper control, its activities also have the potential for causing pollution or detriment to the environment. Consequently, to assist in the preparation of this Working Plan and the attendant Licence Application, the Applicant has first carried out an environmental risk assessment of the site, its operations and its infrastructure. This is attached in tabular format as **Appendix 3**, and has been used as the basis for responding to the requirements of the Agency's 'Working Plan Guidance and Specifications for Metal Recycling Sites' - Volume 12, Edition 2 dated 11th August 1999. APP 3
- 1.8. **Site Location Plans** at scales of 1:8000 and 1:2500 are attached as **Appendices 1 & 1A** respectively, and a **Site Layout Plan** is included at **Appendix 2** (Drawing No M.H./2 Rev. 1, dated 25 January 2001 @ scale of 1:200).

SECTION 2: SITE DESCRIPTION AND CHARACTERISATION OF RISK SOURCE

2.1. SPECIFIED SITE & WASTE MANAGEMENT OPERATIONS:

2.1.1. Description of the Site

- i) The site is in the centre of an industrial area provided specifically for the relocation of many of the 'less glamorous' but vital services to society. Neighbouring activities are of a similar nature being metal recovery and waste management related for the most part. The 1.33 acre site is located on land reclaimed from the foreshore and formed largely with slag from the local steelworks and hardcore. location
1
size.
- ii) There are no watercourses, underground water resources, residential properties or public amenities within 500 metres of the site. no water
- iii) Site security is of a high standard, comprising a 3m high palisade fence on all sides which will be topped with razor wire on the northern (roadside) boundary within 6 months of the issue of the MRS licence. Access is via one set of lockable gates of similar secure construction, and security cameras will be installed within 6 months of the issue of the MRS licence. security
- iv) A substantial building for administrative control and selected operational / storage purposes has already been constructed on the site. This is being extended to the dimensions shown on the **Site Layout Plan** in order to manage and to carry out the dismantling and storage operations shown on the **Site Layout Plan** and to facilitate spares retailing. All necessary records relating to the Waste Management Licence and this Working Plan will be contained within the integral office of this building. the office
- v) The activity of spares storage and retailing is not, of course, a 'controlled waste' activity and is therefore outside the scope of waste management licensing. non controlled waste

2.1.2. Metal Recovery Operations:

- i) The facility undertakes the vital activity of recycling parts and spares from scrap cars, with the vehicle shells being dispatched to a nearby licensed metal recovery organisation for steel recovery. recovery
- ii) The **waste management operations** at the site are restricted solely to the storage and dismantling of scrap vehicles. No other scrap metals are dealt with and no other waste related operations take place. The activities are therefore limited, and have little potential to give rise to environmental problems. storage
dismantling
scrap
- iii) In terms of the Agency's coding scheme (Table MRWP/1.1 of the Working Plan Guidance) the activities are covered by classifications **R3 & R13**. R3 & R13

- iv) As explained at **paragraph 1.4 above**, not all vehicles at the site are waste since some remain classified as 'runners' which may be sold on to the trade or to individuals. Consequently, some incoming vehicles are scrap and subject to site licensing control whilst some remain viable and are not.
- v) The **Site Layout Plan** identifies all key areas of the licensable activities including storage and processing areas for wastes, areas to be concreted and the planned sealed-drainage scheme (see **paragraph 3.2.2(i) below**).

2.2. PERMITTED WASTES

2.2.1. As described above, no wastes are permitted at the site other than in the form of scrap vehicles or vehicle components. **Anticipated maximum waste vehicle input and output levels are summarised as follows:**

MATERIALS PERMITTED	MAXIMUM DAILY WASTE INPUT	MAXIMUM ANNUAL WASTE INPUT	MAXIMUM WASTE VEHICLE STORAGE	MAXIMUM ANNUAL WASTE OUTPUT
Scrap Vehicles	12 vehicles	1,250 vehicles	(i) 550 drained vehicles (ii) 100 undrained vehicles	2,000 vehicles ($<5,000$ tonnes)

2.2.2. The Types and Maximum Quantities of Residual Wastes (other than waste vehicles – table 2.2.1 above) produced and dealt with as a consequence of the dismantling activities are summarised as follows:

WASTES PRODUCED	MAXIMUM WASTE STORAGE	MAXIMUM RECYCLED ANNUALLY	MAXIMUM DISPOSED OF ANNUALLY
Batteries	~2tonnes	~6tonnes	None
Tyres	>90% Retained on shells	~250 tyres	5tonnes
Oil	180gallons	~800gallons	None
Petrol	10gallons	Used in-house	None
Coolant	45gallons	Contract Disposal	
Other – dirt, debris, glass etc.	Minimal (a few sacks/annum.)	None	A few sacks /annum.

2.3. HOURS OF OPERATION

In order to minimise the potential impact of the operations on the amenities of the area the operational hours are normally restricted as follows:

- Weekdays - 09.00 – 18.00hrs
- Saturdays - 09.00 – 18.00hrs
- Sundays - 10.00 – 15.00hrs
- Bank Holidays - 10.00 – 14.00hrs

2.4. STAFFING AND TECHNICAL COMPETENCE

2.4.1. As referenced at paragraphs 1.1 & 1.2 above, Mr. Harrison is the sole owner of the organisation and has lengthy experience of the specialist activity of vehicle dismantling. He has liaised closely with both WRA and (more recently) EA staff over related pollution control matters, and is knowledgeable with regards to the potential environmental ramifications of undertaking such an activity.

2.4.2. Relevant site staffing details are as follows.

NAME	AGE / D.O.B	POSITION	RELEVANT EXPERIENCE	TRAINING
Malcolm David Harrison	48yrs / 02/11/52	Owner & Sole Trader	>13yrs	ONC Mech Eng / in-house
Two other operatives are currently gaining experience of the business and will be trained to become competent for MRS regulatory purposes.				

2.4.3. **Technical Competence** – Mr. Harrison has had over 13 yrs responsibility in managing all the various facets of purchasing, handling, dismantling, storage, disposal and recycling of scrap vehicles and their components etc, and of controlling the environmental consequences of such activities. He has also had over 20years experience in mechanical engineering. It is therefore submitted that he should be considered technically competent for the purposes of the necessary Fit and Proper Person requirements of the relevant legislation.

2.4.4. The time that Mr. Harrison spends at the facility during operating hours, as the technically competent manager, will be recorded in the Site Diary.

recording
or
site

SECTION 3: SITE ENGINEERING FOR POLLUTION PREVENTION & CONTROL

- 3.1: In General:** As described at **paragraph 1.3** above, the waste management activities at the site are limited to the receipt, storage, dismantling and recycling of scrap vehicles and their components. Apart from the limited risks associated with integral batteries and liquid residues, the operations have little potential for causing pollution.

Nevertheless, the following measures have been, or are proposed to be, put in place to minimise any residual environmental risks:

3.2: ENGINEERED SITE CONTAINMENT AND DRAINAGE SYSTEMS

3.2.1. Current Hardstanding, Impervious Paving and Drainage.

- i) Incoming vehicles may initially be parked in the car park area adjacent to the entrance to the site (see 'a' on the **Site Layout Plan**). Its base comprises foundry slag and hardcore. If the vehicles are 'runners' or potential runners (i.e. non-waste) they may remain here until sold or declared 'waste'. Otherwise, they will be held at this location no longer than the end of the day of their delivery before being taken into the site for processing or temporary storage. Any 'waste' vehicles within the car park will be clearly labelled as such to identify them from other vehicles that may be present.
- ii) Drainage of vehicles occurs within the main building (location 'b' on the **Site Layout Plan**) with the vehicles elevated on a ramp above the concrete floor of the building. This concrete is some 8" - 10" thick with steel reinforcing. Oils (engine oils together with any hydraulic or lubricating fluids that may be removed at this juncture) are collected via a metal tundish into steel drums for storage within the building prior to specialist removal. Coolants are also drained within this building and are currently stored in containers to await specialist removal (but see **paragraph 3.2.2(i)** below). **Within 3 months** of the issue of the MRS Licence both the drummed waste oils and the plant oil storage tank will be located permanently inside a bunded area at location 'c' within the building.

The future bunded storage area will be -

- sited on the impermeable concrete base of the building,
- rendered impervious on the inside of all of its walls,
- large enough to hold 110% of the contents of the largest tank it is to contain,
- any fill pipes, funnels, draw pipes or sight gauges etc. will be enclosed within it, and
- any vent pipes will be directed downwards into the bund.

- iii) Drained vehicles are either stored in neat aisles on hardstanding at the rear of the site (location identified on the **Site Layout Plan**) or removed immediately to the nearby fragmentation plant for processing into furnace-ready raw material. Those vehicles retained on hardstanding are stacked no more than two deep and are held for the removal and resale of useful component parts - before final disposal of the shell to a specialist metal recoverer. see p1p
clt 3mets
- iv) Batteries removed from vehicles are stored in a leakproof container, on the concrete base within the site building (see 'd' on the **Site Layout Plan**) pending (a) resale as usable units or (b) removal for a specialist reprocessing. Batteries:
- v) Waste engines and gearboxes that are removed from scrap vehicles may retain a potential for pollution if stored inappropriately. These are therefore held in covered skips located on hardstanding (at 'e' on the **Site Layout Plan**) to minimise the possible spillage of any residual oils onto the ground. Once the extended concreting is complete (see **paragraph 3.2.2 below**) such skips will be stored on concrete at locations 'f' of the **Site Location Plan**. } new

3.2.2. Proposed impermeable base, interceptor and bunding.

- i) **Within four months** of the issue of the Metal Recycling Licence the area 'f' on the **Site Layout Plan** shown **single hatched** will have been fully concreted. This concrete will be profiled to direct **all** associated surface waters to a **new interceptor system** - to be located as shown at 'g' on the **Site Layout Plan**. Aqueous based vehicle coolants and all wash down waters from within the site building will also be directed similarly to this interceptor before being discharged into the foul sewer in Martin Rd. This will effectively become a 'sealed drainage system' within the meaning of the Agency's Working Plan Guidance. was built
- ii) A number of silt traps (minimum of three) will be positioned within the new concreted area at the approximate positions shown as 'm'.
- iii) The area shown **cross hatched** and labelled 'f¹' on the **Site Layout Plan** will be concreted at a later stage (in consultation with the Agency at that time). new
- iv) **Within the 3-month** timeframe described fully at **paragraph 3.2.1(ii)** above, drummed waste oils and the existing elevated fuel tank will be protected by the installation of a bunded area within the site building (location 'c' on the **Site Layout Plan**).
- v) The extended concrete flooring, the interceptor and the bund for secure oil storage will all be professionally designed and installed, with validating CQA reports to demonstrate their 'fitness for the purpose'. These will be available for inspection by the Agency. ✓
- vi) Once installed, the existing and newly concreted areas, drainage system and bunds will be inspected weekly by the site management. A record of these ✓

inspections will be made in the Site Diary together with any remedial works necessary – including the emptying and cleaning of the interceptor, silt traps and drains.

*inspected
weekly
site records*

3.2.3. Underground Tanks

- i) No wastes or materials will be stored in **underground tanks** other than those draining to the site interceptor.

SECTION 4: SITE INFRASTRUCTURE

- 4.1. The principle infrastructure components of the vehicle dismantling facility have been previously described and/or are detailed in the **Site Layout Plan**. These include the main site building, fencing, gates, vehicle and shell storage areas, drainage and dismantling areas, hardstanding areas, future concreted areas and proposed interceptor etc.

All day to day control and supervision, administration, management, domestic facilities, washing and toiletry requirements etc. are provided by way of the main building and its office block as identified on the **Site Layout Plan**.

The Agency's guidance document suggests that this section should focus more specifically on the site security. This therefore follows:

4.2. SITE SECURITY

- 4.2.1. 3-metre high steel palisade fencing surrounds the site ('h' on the **Site Layout Plan**) with strong lockable gates (shown as 'i') of similar material. Razor wire will be added to the top of this fence as it fronts the northern road boundary. A further set of security gates is provided at the entrance to the operational yard ('j' on the **Site Location Plan**). Fencing and gates are subjected to a weekly site inspection to assess their continued integrity, and the results of these checks together with any necessary remedial work will be recorded in the Site Diary.
- 4.2.2. All visitors to the site are required to report to the site office on arrival. With the exception of those attending on official business, no visitors are allowed access to the waste storage or treatment areas.
- 4.2.3. Both sets of gates will be locked at all times when the site is unattended.
- 4.2.4. Within 6 months of the granting of the licence a system of strategically placed closed circuit security cameras will be installed. These will be coupled to alarms should intrusion occur, thereby ensuring 24hr security of the premises.
- 4.2.5. In the event of unauthorised intrusion the circumstances will be entered in the Site Diary. Should additional security measures be considered necessary these will be discussed in advance with the Agency.

Site inspection
by MM

visitors

locked gates

CCV

extra security

SECTION 5: SITE OPERATIONS

5.1 In General: It is the Company's intention that the operations undertaken at this site are carried out in a manner that safeguards the health and safety of site personnel and all other persons, protects the environment from any risk of pollution and minimises any adverse effects on the local amenity. Consequently, this Working Plan and any additional requirements introduced by way of the Waste Management Licence will be strictly adhered to, as will all other relevant statutory waste management requirements such as the Duty of Care, Registration of Waste Carriers etc. as they apply to the site operations.

5.2 In particular: The owner - Mr. M Harrison has worked in the vehicle dismantling business for over 13 years. His two operatives have gained over 2 years relevant experience under Mr. Harrison's direction, and the team is extremely knowledgeable of the industry and of the associated environmental considerations. In the order set out in the Agency's 'Library' guidance these considerations are described as follows:

5.3 CONTROL OF MUD AND DEBRIS

5.3.1. It is uncommon for the operations to give rise to problems associated with the tracking of mud and debris out onto the highway. The only wastes delivered to the facility are scrap cars, and the only wastes removed are vehicle shells, batteries, tyres, and occasional waste oils and site debris.

no
mud on
highway

5.3.2. Shells are transported from the site in the Company's own vehicle. This vehicle is inspected before departing the site to ensure freedom from leaks and clean wheels, and is subjected to regular in-house maintenance. It is steam-cleaned and maintained in good condition as necessary.

vehicle
collecting
shells

5.3.3. The vehicle shells and any other wastes for dispatch are currently loaded on the vehicle and leave the site via the existing hard-standing surface. Within 8 months of the issue of the licence it will become necessary for the vehicle to traverse the proposed concreted area ('j' on the **Site Layout Plan**)) before entering Martin Rd. The risk of extraneous matter being dragged out onto the highway will then be further minimised.

5.3.4. Nevertheless, the entrance to the site and the adjacent highway will continue to be inspected daily and in the rare event of any fouling from the activities being apparent this will be cleaned up before the end of that working day. A record of any such site clean up and of any incidents of highway fouling will be maintained in the Site Diary.

inspect
highway
diary

5.4. POTENTIALLY POLLUTING LEAKS & SPILLAGES

5.4.1. Leaks and spillages are possible from the dismantling of vehicles unless competently handled. The current procedures for minimising such risks are described under section 3.2 above, as also is the Company's intent in regard to improving matters during the 4-month period following formal issue of the MRS Licence. *was 6 months*

5.4.2. For completeness, these procedures are summarised as follows:

i) **Currently:**

- a. Vehicles awaiting processing are stored on hardstanding (but see ii below).
- b. Vehicles are drained of their fluids at a designated location within the main site building ('b' on the Site Layout plan) with oils collected in 45gall drums within the site building. A specialist contractor subsequently removes these.
- c. Batteries are removed within the main site building and stored undercover in leakproof containers (at 'd' on the Site Layout Plan).
- d. Parts for resale as functional spares may also be removed at this point and these are stored within the main site building or, in the case of reusable engines and gearboxes, in large containers outside ('n' and 'o') on the Site Layout Plan. Such materials, of course, cease to be classified as 'waste' and are outside the scope of this Working Plan, as are also - batteries and tyres that are sold on as 'second hand'. Container 'p' holds site spares and building materials etc., i.e. is also for the storage of non-waste.
- e. Waste engines and gearboxes etc., are currently stored securely in covered skips placed on hardstanding ('e' on Plan).
- f. A supply of absorbent material (sand / sawdust and /or granules) is maintained within the site building to deal with any spillage of oil or oily water, and a sack of cement dust is also maintained to neutralise any spillage of battery acid. *absorbents*

ii) **Within four months of the issue of the MRS licence:**

As described at section 3.2.2(i) - (iii) above -

- a. A concreted area will be constructed to cover the area hatched (and labelled 'f') on the Site Layout Plan and profiled to ensure that surface waters and any spillages cannot over-top its edges onto unprotected land.
- b. A proprietary interceptor system will be installed as shown on the Site **Layout Plan** within the hatched area which, together with associated drainage, will ensure the collection and physical separation of all drainage from the concreted areas and from the floor of the main building.

- c. The design, construction and installation of these improvements will be carried out professionally under CQA procedures and in full liaison with the Agency.

5.4.3 (i) In the event of any spillage or leakage of oils from scrap vehicles at any stage of the site operations, these will be contained using the absorbents described at paragraph 5.4.2(i) f above.

(ii) Any such used absorbents and (if relevant) any associated hardstanding will be securely bagged or containerised for authorised disposal elsewhere.

5.4.4 In the rare event of acid spillage from any of the batteries removed from vehicles, this will be neutralised with the cement dust (kept in store adjacent to the battery container). The affected area will be thoroughly cleaned and all residues containerised for authorised disposal elsewhere.

5.4.5 A record of any such spillages and the corrective action taken will be kept in the Site Diary.

5.4.6 The bunded area for storage of drummed waste oils (location 'c') will be clearly labelled, and the drums visually inspected on a daily basis to establish their remaining capacity. The bunded area will be inspected at the same time to ensure that it remains sound and free from leaks. The checking of the drums and of the bunded area, and the periodic removal of the waste oil, will be recorded in the Site Diary.

5.5. FIRES ON SITE

5.5.1. No deliberate burning of waste occurs at the site and all necessary steps are taken to safeguard against accidental fires. Any fire will be treated as an emergency.

5.5.2. To deal with such an emergency portable fire extinguishers are available at the site. In addition, before the site receives its licence, it is intended to provide a controlled-flow delivery hose that can be connected to the mains.

5.5.3. All fire fighting equipment is regularly checked, maintained and, as necessary, replaced to ensure continuing effectiveness, and all such checks recorded in the Site Diary.

5.5.4. In the event of a fire emergency the Fire Authority will be notified and called to attend as necessary. Any residues from such an incident will be safely containerised and, when certain that no further combustion is likely, removed from the site for authorised disposal elsewhere.

5.5.5. Any unauthorised fire incident will be recorded in the Site Diary and the Agency notified as soon as possible. The system checks, their outcome and any resultant action are also recorded in the Site Diary.

5.6. WASTE ACCEPTANCE & CONTROL SYSTEMS & PROCEDURES

- 5.6.1. Since the only waste materials accepted at the site are scrap vehicles, then apart from the inherent content of undrained cars, there is limited scope for the risk of polluting wastes to be received – particularly wastes likely to present a serious threat of pollution or harm.
- 5.6.2. Vehicles are brought to the site in a number of ways –
- Collected by the Company.
 - Brought by the supplier in a lorry.
 - Driven or towed by the supplier.
- 5.6.3. On arrival at the facility (see also para 3.2.1(i) all scrap vehicles delivered by others are inspected. Any found to contain 'rogue' materials are not accepted unless such materials are removed and taken away by the supplier. *new*
- 5.6.4. Following acceptance all vehicles are 'booked in' at the site with the following information recorded:
- i) Number of vehicles delivered
 - ii) Name and Address of Supplier
 - iii) Statement as to the classification of the vehicle i.e.
 - Waste (scrap)
 - Non-waste (i.e. still a 'runner')
 - Potential waste (i.e. potentially capable of repair or not yet written-off by the insurers)
- 5.6.5. If known to be waste and delivered by, or collected from, commercial or industrial premises, the necessary associated Duty of Care transfer notes are sought. These will be retained at the site for inspection by the Agency at all reasonable times.
- 5.6.6. Following further inspection to ensure that no 'rogue' wastes have been hidden in the deliveries, the vehicles are then directed to the appropriate storage areas as shown on the **Site Layout Plan** i.e:
- i) Runners and vehicles awaiting insurers decisions are not wastes and may lawfully be stored at any convenient area of the site.
 - ii) Scrap vehicle deliveries and vehicles that are subsequently declared as scrap are processed within the site building to remove fluids (as previously described). They are then stored on hardstanding on the area shown as 'k' on the **Site Layout Plan**.
 - iii) Within 4 months of the issue of the licence, as previously described, all wastes still containing oils will only be stored on concrete areas. Both the proposed

concreted areas and the hardstanding areas are clearly identified on the **Site Location Plan**.

- iv) The need for flexibility of operation may demand that both drained and undrained vehicles are stored on the future concreted areas. However, once the concreted areas proposed have been installed, **no** undrained waste vehicles will be stored on hardstanding.

5.6.7. In the rare event of any 'rogue' waste materials being discovered in the incoming vehicles (e.g. potentially polluting materials such as filled or partially filled containers, packages or other unknown substances) these will be carefully removed to a covered container on a concrete base until professional advice is obtained on their appropriate disposal. A record of such wastes will be made in the Site Diary and the advice of the Environment Agency sought if the materials are considered to present an environmental risk.

quarantine bin

5.6.8. In the case of batteries removed from waste vehicles or 'discovered' in vehicles these will be stored within the leakproof receptacle provided (see 'd' on the **Site Layout Plan**) to await specialist removal if considered to be waste (i.e. incapable of salvage for resale as found second hand batteries).

5.6.9. All wastes dispatched from the site for further treatment, disposal or recovery (essentially vehicle shells and the components of vehicles which may no longer be regarded as reusable) are properly documented in accordance with the Duty of Care, transported only by registered waste carrier (usually the licence holder) and dispatched only to an authorised outlet.

NB. Regular deliveries of waste to the same outlet may be controlled through the 'season ticket' arrangements.

5.6.10. Records are maintained of all waste loads entering and leaving the site and these are available for inspection by the Agency at all reasonable times. Summaries of such records will be kept as agreed with the Agency and forwarded to the Agency on an annual basis.

5.7. WASTE SAMPLING AND TESTING

5.7.1. It is not normal for the Company to sample and analyse waste supplies since these are limited to vehicles only and the suppliers are often well known. However, if any 'rogue' wastes are found which require being quarantined (**para 5.6.7**) and for which expert advice is required, these may, conceivably, require sampling and analysis.

5.7.2. Where such testing is required a note will be made in the Site Diary and the results of the tests kept at the site office. These will be made available for inspection by the Agency at all reasonable times.

5.8. WASTE QUANTITY MEASUREMENT SYSTEMS

- 5.8.1. Vehicles received at the site are quantified, for licensing purposes, in terms of the numbers of vehicles deemed to be waste. Wastes removed from the site (for the most part vehicle shells plus waste gear boxes and engines etc.) are weighed at the receiving facility elsewhere. This also applies to batteries. A copy of the weights obtained will be maintained at the site office and made available for inspection by the Agency at all reasonable times.
- 5.8.2. Waste liquids removed from the site (oils, sump emptyings and, in the future, interceptor emptyings) are removed by specialist contractor. In these instances the volume of the contents is recorded and DoC or Special Waste documentation (as appropriate) completed. These records will be available for inspection by the Agency.
- 5.8.3. As stated at para 5.6.10, annual returns of all waste inputs and outputs at the site will be made to the Agency in the form required by the Agency. If the Agency require information in tonnes only we will calculate these from the Agency's agreed conversion ratios.

5.9. STORAGE OF SPECIFIED WASTES

- 5.9.1. The Company does not deliberately accept hazardous or polluting wastes other than those already described i.e. the inherent content of vehicles. The storage of these and of any 'rogue' wastes found within deliveries has been previously described at paras 5.6.7 & 5.7.1 above.
- 5.9.2. Supplies of absorbent materials are kept in close proximity to the oil storage bund and the vehicle-dismantling bay to deal with any spillages, and a supply of cement dust is maintained, under cover, close to the battery store to neutralise any spillages of acid.

5.10. SPECIFIED WASTE TREATMENT PROCESS – PLANT, EQUIPMENT AND PROCEDURES

- 5.10.1. The only 'waste treatment' process currently occurring at the site is that of the simple dismantling of waste vehicles. The potential environmental risks associated with this activity and their attenuation have been discussed in some detail elsewhere throughout this document.

SECTION 6: POLLUTION CONTROL, MONITORING & REPORTING SYSTEMS

6.1 In General: The operations, as described, do not involve any sampling or monitoring other than that as may be specified for the interceptor discharge. However, should the Agency require monitoring of any of the environmental considerations listed under **para 6.2** below at some time in the future, this will be discussed with the Agency and any agreed national protocol taken into consideration in responding to the requirement.

6.2 List of potential future environmental monitoring parameters:

6.2.1. Specified Gases, Vapours and Aerosols

6.1.1. Groundwater

6.1.2. Surface waters (unlikely – no nearby water courses)

6.1.3. Meteorological conditions

7. AMENITY MANAGEMENT AND MONITORING SYSTEMS

7.1. CONTROL, MONITORING AND REPORTING OF DUST, FIBRES AND PARTICULATES

- 7.1.1. The limited nature of the wastes received and the limited operations performed upon them restricts any potential for material to become airborne. Nevertheless, we are conscious of the potential for such risks and maintain control as follows:
- 7.1.2. Concreted surfaces within the building are swept and washed down at regular intervals. This will extend to the proposed concrete areas (previously described) once installed.
- 7.1.3. Under extremely dry or windy conditions, as necessary, surfaces will be damped down to minimise dust production.
- 7.1.4. Visual monitoring will take place around the outside of the site at times when the risk of dust etc., release is a possibility, and any complaints from neighbours will be investigated and dealt with immediately.
- 7.1.5. Records will be kept in the Site Diary of complaints and of any action taken

7.2. CONTROL OF ODOURS

- 7.2.1. It is not envisaged that any wastes likely to give rise to offensive or objectionable odours will be received at the site (see paragraph 2.2.1 & 2.2.2 above). When installed, the interceptor will be cleaned and emptied to the frequency required.
- 7.2.2. Stagnant pools of standing water will not be allowed to remain on the site.
- 7.2.3. The Company will remain alert to this potential nuisance and will carry out simple weekly olfactory monitoring (simple 'sniffing') around the boundaries of the site. In the unlikely event of such a nuisance the Company will react positively to investigate and resolve it, and will keep records accordingly. These records will form part of the Site Diary and will include details of the boundary monitoring and of any subsequent action. The advice of the Agency may be sought should any such nuisance persist.

7.3: CONTROL AND MONITORING OF NOISE

- 7.3.1. Since the site is in an area set aside for similar industrial activities, the likelihood of the site giving rise to noise pollution is negligible. Further, the nature and intensity of activity at the site is not conducive to the production of noise nuisance.
- 7.3.2. Nevertheless, the Company is conscious that certain dismantling operations may be viewed as 'noisy' during 'unsociable' hours. The hours of operations are therefore limited accordingly (see para 2.3 above).
- 7.3.3. Efforts will also be made at all times to minimise the drop height of waste metal.
- 7.3.4. Should there be any complaints of noise these will be investigated at once and action taken to reduce or overcome the problem wherever practical.
- 7.3.5. Records of any complaints and the action taken will be entered in the Site Diary. Should complaints persist we will discuss with the Agency how we should undertake the professional investigation and minimisation of these.

7.4 CONTROL OF PESTS

- 7.4.1. Wastes of a nature likely to encourage or harbour insects and vermin are rarely encountered at the site. However, due to close proximity of the local sewage works, it may occasionally be necessary to bait or trap rats.
- 7.4.2. Consequently, in the event of rodent infestation at the site, the advice of the local Environmental Health Department would be sought immediately, and its recommended action taken. A record of this will be made in the Site Diary.

7.5. CONTROL OF LITTER

- 7.5.1. As with para 7.4 above, due to the nature of the wastes received, litter problems are rarely encountered. Wastes are handled with care and recognition taken of extreme weather conditions. Under high winds, any wastes that are likely to become airborne will not be unloaded or loaded, and netting or sheeting will be applied to loads, as necessary, to retain stored materials.
- 7.5.2. Further, even under the most disadvantageous weather conditions the site fencing is extremely effective in retaining any litter that may arise. Nevertheless, the site (inside and out) will be inspected on a weekly basis and any litter arising from the site operations collected and disposed of responsibly.
- 7.5.3. All such inspections and any action taken will be recorded in the Site Diary.

8. SECURITY AND AVAILABILITY OF RECORDS

8.1. The Site Diary and all records referred to in this Working Plan will be maintained securely within the site office. These are currently in paper form.

8.2. In particular, the Site Diary will include:

- i. Attendance hours of the Technically Competent Management - para 2.4.4.
- ii. Inspections of impervious areas and drainage system etc. - para 3.2.2(vi)
- iii. Inspections of security arrangements - para 4.2.1.
- iv. Records of unauthorised intrusion - para 4.2.5.
- v. Inspections and action re highway - para 5.3.4.
- vi. Action re spillages - para 5.4.5.
- vii. Checks on oil storage and bunds - para 5.4.6.
- viii. Checks on fire equipment - para 5.5.3.
- ix. Recording of fires - para 5.5.5.
- x. Recording of 'rogue' deliveries - para 5.6.7.
- xi. Waste monitoring - para 5.7.2.
- xii. Dealing with dust, odours and noise - paras 7.1.5, 7.2.3. & 7.3.5.
- xiii. Recording of action re pests etc. - para 7.4.2.
- xiv. Recording of action re dust & litter etc. - para 7.5.3.

8.3. The above plus any other relevant records will be available for inspection by the appointed Agency Officer at all reasonable times.

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