



Management System Summary

TeleCycle Europe Ltd



Helping clients prosper through compliance

SITE DETAILS

TeleCycle Europe Ltd
Unit 15 Drome Rd
Deeside Industrial Park,
Sealand Garden City
Flintshire
CH5 2NY

OPERATOR DETAILS

TeleCycle Europe Ltd
450 Brook Drive,
Green Park,
Reading,
Berkshire,
RG2 6UU

APPLICATION REFERENCE

PPN-00750

DOCUMENT REFERENCE

K419.1~09~004

ISSUE DATE

16/06/2022



Wiser Environment Ltd, Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
94 Xuan Thuy, Thao Dien Ward, District 2, Ho Chi Minh City, 713385
+44 1480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk

DOCUMENT CONTROL

DOCUMENT TITLE:	Management Plan
REFERENCE:	K419.1~09~004
CLIENT:	TeleCycle Europe Ltd
REPORTED BY:	Wiser Environment Limited
STATUS:	Final
ISSUE:	01
ISSUE DATE:	16/06/2022
AUTHOR:	Wiser Environment Limited
APPROVED BY:	TeleCycle Europe Ltd

REVISION HISTORY

REFERENCE	DATE	ISSUE:	REVISION SUMMARY
K419.1~09~004	13/05/2022	D1	For client review.
K419.1~09~004	16/06/2022	D2	Following client feedback.

QUALITY CONTROL

ACTION	DATE	NAME
Prepared	06/05/2022	Andrea Petrolati
Checked	13/05/2022	Elliott Howard
Approved	16/06/2022	Andrea Petrolati

CONTENTS

1	INTRODUCTION	6
2	PURPOSE OF MANAGEMENT SYSTEM	7
3	PERMITTED ACTIVITIES.....	8
4	OPERATIONS AND MAINTENANCE	9
4.1	Waste Acceptance.....	9
4.1.1	Waste reception.....	9
4.1.2	Unloading of waste	9
4.2	Storage of waste.....	9
4.3	Plant and Equipment.....	10
4.4	Pollution Prevention.....	10
4.5	Site Operational Procedures.....	10
4.6	Site Security.....	10
5	ACCIDENT AND EMERGENCY CONTROL	11
5.1	Fire.....	11
6	WASTE MANAGEMENT	12
7	TRAINING AND COMPETENCE.....	13
8	COMPLAINTS	14
9	DOCUMENTS AND RECORDS	15
10	SITE CLOSURE.....	16

TABLES

TABLE	TITLE
Table 1	Key Contact on Site

DRAWINGS

REFERENCE	TITLE
K419.1~20~001	Permit Boundary Plan
K419.1~20~002	Sensitive Receptors Plan (1km)
K419.1~20~003	Site Setting Plan (2km)
K419.1~20~004	Site Layout Plan
K419.1~20~005	Drainage Plan

APPENDICES

APPENDIX	REFERENCE	TITLE
Appendix A	K419.1~09~006	Sensitive Receptors Table

1 INTRODUCTION

This document is the Management System Summary (MSS), as required by application form Part B2, Section 3d *Management Systems (all)* and the associated Natural Resource Wales guidance¹. The MSS accompanies the application for Bespoke Environmental Permit (Ref: PPN-00750) to be submitted to Natural Resources Wales (NRW) for the:

- Physical treatment (including temporary storage) of <10 tonnes/day hazardous and non-hazardous waste, consisting of:
- Sorting, separation, grading and shearing of catalytic converters into different components and milling of catalytic converters ceramic cores (non-hazardous).
- Sorting, separation, grading and shearing of WEEE, mainly printed circuit boards

The site is operated by TeleCycle Europe Ltd and is located at Unit 15 Drome Rd, Deeside Industrial Park, Sealand Garden City, Flintshire, CH5 2NY. The location is shown on the *Permit Boundary Plan* (K419.1~20~001) in Section 08 of this application pack. Waste activities are undertaken within an area of approximately 0.07 ha within a contained industrial unit.

The national grid reference for the site is SJ 33521 70505. It is found some 8 km northwest of Chester and 8 km northeast of the town of Buckley. The site lies in an industrial estate off the A494 a short distance from the England/Wales border; for a full breakdown of surrounding land use please see the Sensitive Receptors Plan (K419.1~20~002) and the Site Setting Plan (K419.1~09~003) and the Sensitive Receptors table (Appendix A).

The application has been prepared by WISER Environment Limited on behalf of the applicant and operator TeleCycle Europe Ltd.

¹ [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/develop-a-management-system-environmental-permits)

2 PURPOSE OF MANAGEMENT SYSTEM

TeleCycle Europe Ltd collects catalytic convertor and WEE components from supply chains within the UK and sends the waste overseas for recovery of precious metals. The Company has a number of operational procedures which form the basis of their Management System.

The Management System covers operations associated with the trading and brokering, collection, transport, storage, treatment and recovery of precious metal-bearing materials and waste as well as continuous development.

The aim of the Management System is to document procedures and work instructions which are implemented and maintained on site.

The scope of the Management System extends to all operations associated with the acceptance, handling, treatment and storage of waste at the site. The wastes permitted to be accepted at the facility are detailed within Section 09 of this application.

The Management System has been produced in accordance with the Natural Resource Wales Environmental management – guidance ‘*Develop a Management System: environmental permits*’ (updated 4th August 2021)².

Benefits of operating an effective and efficient Management System are to ensure sustainable business practices, reduce risks and losses, reduce operational costs, to help obtain business and a good reputation, and to ensure legal compliance.

The key contacts regarding the operation of the sites Environmental Permit are:

TABLE 1. Key Contact on Site

Dean Graham	Tel: +44 (0) 11833 40245	e-mail: dgraham@telecycle.com
-------------	--------------------------	-------------------------------

² [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits)

3 PERMITTED ACTIVITIES

Permitted activities are restricted to the physical treatment (including temporary storage) of hazardous and non-hazardous waste.

WEEE (printed circuit boards) are not processed on site, only temporary stored prior to shipment.

Catalytic converters are separated into different components for the purpose of recycling thorough sorting, separation, grading and shearing.

Permitted activities codes are:

- R4: Recycling/reclamation of metals and metal compounds; and
- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

Further details can be found in the *Non-Technical Summary* (K419.1~09~001) in Section 03 of this application.

4 OPERATIONS AND MAINTENANCE

All operations and working practices are regularly reviewed and improved where necessary. There are robust mechanisms in place for investigation of incidents/accidents if they occur.

Site operations are presented on the Site Layout Plan (K419.1~20~004).

4.1 Waste Acceptance

4.1.1 Waste reception

On arrival, vehicle details will be recorded in the site diary or similar document. The driver must also present copies of the waste carrier's licence appertaining to the transport company concerned and the relevant Waste Transfer/Consignment Note.

All loads are inspected for non-permitted wastes, quality, and conformance with the Environmental Permit requirements. Non-conforming loads are refused entry and details are recorded.

All drivers must be wearing appropriate PPE, before beginning the unloading process.

Waste loads will be unloaded using a forklift truck or pallet truck. Smaller packaged items may be unloaded manually.

Wastes are stored in individual storage containers. For example, bulk bags, crates, and drums. All wastes are accepted as pre-booked orders and are allocated a job number specific to the client and instruction. All wastes are stored and processed as batches, passing through the processes consecutively, which removes the risk of long-term waste storage and ensures turnover of waste.

4.1.2 Unloading of waste

Waste loads will be unloading using a forklift truck or pallet truck. Smaller packaged items may be unloaded manually.

4.2 Storage of waste

Wastes are stored in individual storage containers, e.g., bulk bags, crates, and drums. All wastes are accepted as pre-booked orders and are allocated a job number specific to the client and instruction. All wastes are stored and processed as batches, passing through the

processes consecutively, which removes the risk of long-term waste storage and ensures turnover of waste. All storage areas are detailed within the Site Layout Plan (K419.1~20~004).

4.3 Plant and Equipment

The site is equipped with two shears, folk-lift truck and dust extraction system.

All equipment is periodically inspected in accordance with manufacturer's guidelines and manuals to ensure the plant and equipment is available for work, when required.

The site manager also maintains a register of all calibrations of measuring and monitoring devices. All calibrations are undertaken by an approved subcontractor.

4.4 Pollution Prevention

Potential sources of pollution have been identified, in the Environmental Risk Assessment (K419.1~09~005) in Section 07 of this application, as:

- Dust;
- Fire;
- Accident;

Daily site inspection checks are undertaken by staff.

Treatment areas are fully enclosed within a building towards to the rear of the site.

Site housekeeping and a fully enclosed dust extraction system prevent the release of dust-off site.

4.5 Site Operational Procedures

The site is operated in accordance with a number of written procedures incorporated within the TeleCycle Europe Ltd Company Management System.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

4.6 Site Security

The site is enclosed within a secure compound, situated in an industrial estate and benefits from CCTV coverage with an automatic gate.

5 ACCIDENT AND EMERGENCY CONTROL

The following Emergency Action Plans are provided within the MS:

Accident and Emergency (general);

- Spillages;
- Fire Evacuation Plan; and
- Temporary Closure

5.1 Fire

Fire prevention and management will be undertaken in accordance with the site-specific Fire Prevention Plan which can be found in Section 05 of this application.

6 WASTE MANAGEMENT

The site produces limited quantities of non-recoverable waste streams which are not forwarded to further re-processors. Those residual wastes are managed through contract with a waste management company.

7 TRAINING AND COMPETENCE

The site shall be overseen and managed by a Technically Competent Manager (TCM) holding the relevant Operator Competence Certificate qualification. A TCM will be available at all required times during site operation. The TCM will be responsible for the day-to-day operations at the site, and to ensure that site personnel operate the site in compliance with the Environmental Permit. They will be responsible for ensuring adequate training of staff has been undertaken.

The TCM will report any problem, or potential problem, to Senior Management as well as the National Resource Wales.

The TCM will attend site in accordance with the attendance criteria specified within 'Environmental Management – Guidance: Legal operator and competence requirements: environmental permits' (updated 11th June 2019)³.

All new site staff are taken through an Induction Process covering all areas of site operations including: Emergency procedures, PPE, all site operations, company policies, and all relevant conditions of the Environmental Permit.

To ensure safe operation of the site, all site operators are trained in the use of site plant and equipment.

Operator training is reviewed regularly through refresher courses to ensure continued competence in their daily tasks.

³ <https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits>

8 COMPLAINTS

All complaints received concerning the permitted site will be dealt with in accordance with the existing Management System.

On receipt of a complaint the TCM, or their nominated person, will investigate the complaint to see if the cause can be rectified swiftly. Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint, the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

All complaints will be acknowledged and investigated, with resultant actions reported to the complainant and the National Resource Wales (if required).

9 DOCUMENTS AND RECORDS

All records required by the Environmental Permit will be held by TeleCycle Europe Ltd.

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office.

Records of all waste received at and removed from the site will be maintained on site and reported to the National Resource Wales on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and conditions of the Environmental Permit.

10 SITE CLOSURE

TeleCycle Europe Ltd will plan for the closure of the site through maintaining the Site Condition Report entailed within Section 04 of the application pack.

The Site Condition Report will be supplemented with records of site maintenance and development, following pollution incidents records of actions taken and any remedial works and verification reports undertaken shall be kept, as well as any monitoring results.

The information collated during the lifetime of the permit will be utilised to prepare the surrender Site Condition Report to ensure that the site operation has not caused a detrimental impact to the surrounding environment.



Helping clients prosper through compliance

Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
01480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk

