

	<h1>Tin Can Stockpile Management Procedure</h1>	Procedure	<b>ECP59</b>
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		Revision	1
		Date	July 2022
Prepared by: Environmental Advisor		Approved by: Environmental Manager	

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### 1.0 Objective

This procedure has been developed to provide internal guidelines detailing the requirements for correct management of scrap stockpiles in order to prevent pest populations reaching a level where they become a nuisance to the local community.

### 2.0 Background

In 2019 CELSA UK started purchasing tin cans as a source of scrap metal. Recycling tin cans allows the company to generate ‘Packaging Return Notes’ which can be sold to participants of the Government’s ‘Packaging Waste Return’ scheme, who need to offset the use of metal packaging in their products. The stockpiles were not correctly managed, resulting in a major fly infestation on site which spread to households in the local community. This resulted in a large quantity of complaints and ultimately being investigated by Natural Resources Wales, who put a temporary stop on any incoming tin can deliveries until the situation was under control.

Following on from this incident, CELSA has a standing agreement with Natural Resources Wales on how the stockpiles of tin cans are managed on site moving forward:

- Tonnage on site must not exceed 6,000t
- Stockpiles should be treated regularly to keep fly populations under control

### 3.0 Scope

This procedure refers to the Scrap Bay area of the Melt Shop Environmental Permit EPR/TP3639BH, and all tin can stockpiles.

### 4.0 Responsibilities

- Scrap Purchasing are responsible for managing the stockpile levels to ensure they remain below the 6000t limit
- Scrap Handling are responsible for ensuring that the stockpiles are treated on a suitable frequency to prevent nuisance pests (frequencies of pest control management will need to be varied in line with the increased risk caused by volume of material and weather conditions)
- Scrap Handling are responsible for undertaking daily audits and ensuring the effectiveness of the control measures where they are found to be ineffectual they are responsible for undertaking a corrective action, such as, increasing the frequency of pest control management.
- Scrap Handling must inform the Environmental Department of any noticeable increase in pest activity and corrective actions taken to address this.

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- The Environmental Department are responsible for communicating with the regulatory authority, Natural Resources Wales, regarding information that is relevant to the Melt Shop Environmental Permit EPR/TP3639BH.
- Scrap Handling are responsible for raising any incidents and hazards relating to pest activity in the Scrap Bay on ProSafety.

### 5.0 Policy For Management Of Pests

- Tin can stockpiles are to be checked daily.
- Tin can stock levels need to be managed to remain below 6000t during the summer months i.e. October – March.
- Contract set up for treatment of stock throughout the year with a focus on the summer months (March to October). This will include fly traps around perimeter of scrap bay and spraying of stock piles with insecticide.
- During the summer months stockpile treatment will be carried out 3 times a week using insecticide.
- During the winter months stockpile treatment will be carried out once a month using insecticide.
- Daily inspection of pest levels are to be carried out by scrap inspectors. If increased pest levels are evident then ad hoc treatment measures will be arranged as soon as possible.
- Stockpile level management discussed on a daily basis by scrap handling team in the Scrap Evolution Daily Meeting.
- At all times tin can stock must be stored under cover, out of direct sunlight and the stockpile should not be more than 4 meters in height.
- Oldest tin can stock is consumed first. New stock should not be deposited on top of existing old stock to promote stock turnover, and prevent existing eggs and associated fly activity spreading to new stock.

### 6.0 Procedure for Pest Control Management

Task No.	Action	Comments
1	Daily inspection of stockpile  Approximately midday carry out visual inspection of tin can stockpile.	Note – this needs to be carried out from within 1m of the stockpile to see if pests are present.

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2	<p>If level of flies are above the Pest Level 1 go to Task No. 3 If above Pest Level 2 go to Task No. 4</p>	<p>Pest Level 1 - Visible increase of number of flies but not to extent where it is a nuisance to operator. (If 1 rat is visible during daylight hours this is Pest Level 1)</p> <p>Pest Level 2 - Visible increase of number of flies causing a nuisance to the operator. (If multiple rats are visible during daylight hours this is Pest Level 2)</p>
3	Operator has deemed Pest Level 1 has been met, then confirm next Pest Control site visit is within the next 2 days	If Pest Contractor is not visiting within the next 2 days, then arrange additional visit.
4	Operator has deemed Pest Level 2 has been met, then confirm next pest control site visit is happening either that day or the following day	If Pest Contractor is not visiting within the next 24 hours, then arrange same day visit.
5	Record observations from the visual inspection on the shift report	
6	If either threshold is breached, inform the environmental team of any remedial actions taken.	Contact Details – see above

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### 7.0 Procedure for Tin Can Stockpile Limit Control

Task No.	Action	Comments
1	Management to review current tin can stock levels on site in daily operations meeting	Daily stock meeting in area to review acceptance of further tin can onsite.
2	Scrap Handling Manager / Team leader to inform weighbridge operator if scrap levels are above target levels and to turn away any additional deliveries	Site Stockpile limit 6000t
3	Scrap Handling Manager to inform Scrap Purchasing of exceedance of stock limits and no more stock to be accepted on site until stock is consumed and within control limit.	Scrap Handling Manager to inform Scrap Purchasing when stock levels have dropped below stock limit by minimum of 500t.

### 8.0 Records

- Weekly reports are completed by the contractor responsible for stockpile treatment. These should be sent to the Scrap Handling team, with the Environmental Department copied in for reference.
- The scrap evolution daily report records the tonnage of tin cans on site each day. This will be used for evidence of agreed stockpile limits being maintained, and for discussion in daily scrap meetings to assess if any intervention needs to be made.

### 9.0 Documentation

- 6.1 Scrap evolution daily report
- 6.2 Contractor weekly site visit report