Metal recycling, vehicle storage, depollution & dismantling (authorised treatment) facility

Environmental Management System

Report Number 2135r3v3d0721

Permit reference:

Waste returns reference:

Operator:
Pembrokeshire Metal Recycling
Carew pavilion
Carew Airfield
Tenby
SA70 8SX

Prepared with assistance from:
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1 INTRODUCTION TO EMS

1.1 The Permit

Pembrokeshire Metal Recycling (PMR) is seeking a Permit from NRW to allow for Metal Recycling and Vehicle Depollution and dismantling at their site in Carew, Pembrokeshire. The site location and site layout is shown in Plate 1-1 Figure 2. A copy of the Permit is provided in Appendix 1. A copy shall, at all times, be available at site.

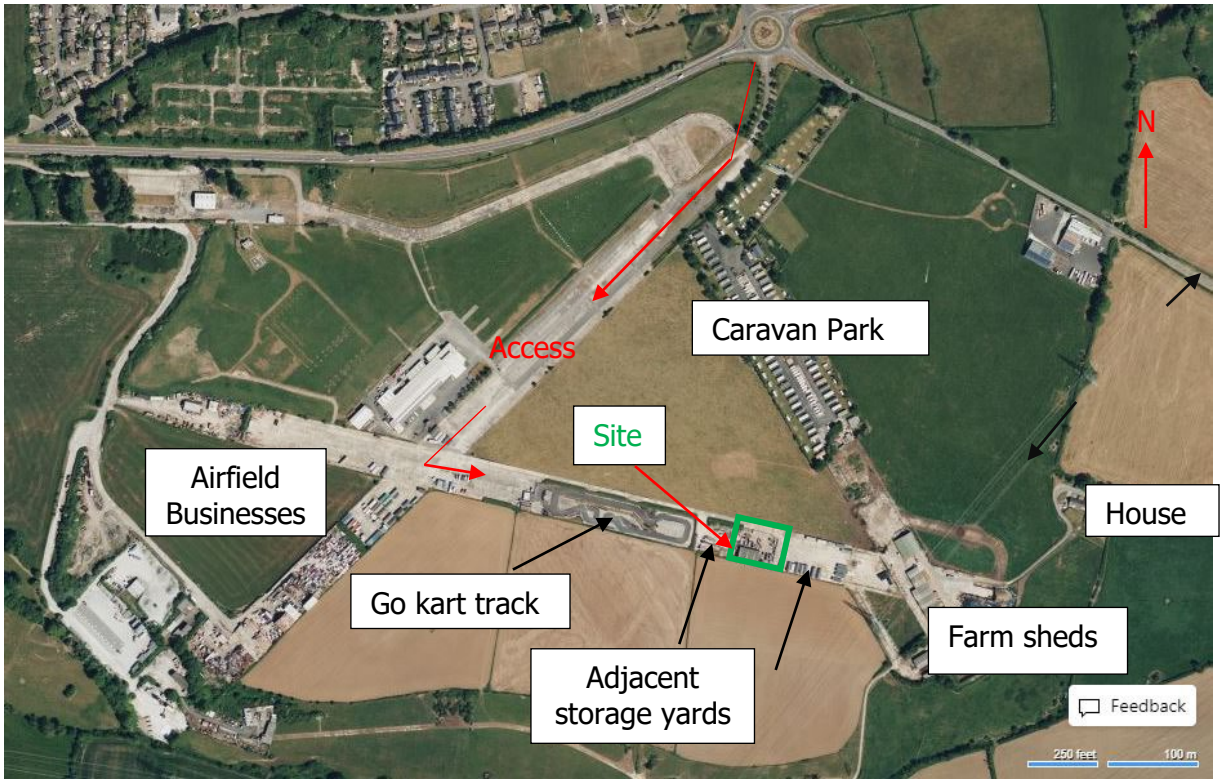

Plate 1-1 Key Points of interest (see also Figure 3)

The Permit would allow ferrous metals, alloys and non-ferrous metals to be recovered using the following activities:

- sorting
- separation
- grading
- cutting using hand-held equipment only

Waste motor vehicles (End of Life vehicles) would also be recovered.

The total quantity of waste that can be accepted at a site under these rules must be less than 40,000 tonnes a year of waste metal and less than 8,000 tonnes a year of waste motor vehicles.

1.2 Purpose of this Environmental Management System (EMS)

This EMS is a requirement of the Permit and is based on ensuring that the potential risks to the environment from the operation are controlled, managed and minimised. The risks have been separately evaluated in an Environmental Risk Assessment (ERA). This is provided in a separate report.

1.3 Using the EMS

The risks to the environment are controlled and minimised by the site layout and pollution control measures. During day-to-day operations all aspects are subject to inspection and procedures aimed at minimising environmental risks.

- The Procedures to be followed are provided in Appendix 2.
- The information to be gathered during implementation of the EMS is detailed in Appendix 3. This information may also be recorded in the Site Diary.

2 COMMITMENT TO EMS

2.1 Policy Statement

Pembrokeshire Metal Recycling is fully committed to:

- Recovering metals and ELVs in a way that does not pose a significant risk to the environment and in accordance with a documented Environmental Management System.
- Meeting and, where appropriate, exceeding the requirements of relevant legislation, regulations and other requirements.
- Implementing procedures to detect and, where possible, prevent pollution.
- Working with the regulators, clients, sub-contractors, customers and third parties to minimise environmental impact.
- Providing appropriate environmental training to its employees and communicating environmental issues to all employees.

The responsibility for determining the Company's policy on the Environment, including revision of this Policy, lies with the Managing Director.

This Policy will be annually reviewed.

Signed For and on behalf of the Board of Directors

Matthew Jones
Director

Date 12 June 2021 Review Date 12 June 2022

2.2 Legislation

The operator will ensure that the operation meets the requirement of current legislation. Each year, a check will be made with NRW for any new relevant legislation.

2.3 Guidance

To help ensure that the operation meets current legislation and good practice, the operation will take into account guidance. This will include those identified in the reference list.

2.4 Operator Competence

The operator recognises that an EMS should not be viewed in isolation as many aspects of the business can impact on the successful implementation of the EMS. The operator also recognises that the role of the management representative is not to undertake all of the work required to implement the EMS. For this reason, PMR will document the roles and responsibilities for all personnel. Key authorities and responsibilities will be defined, documented and communicated to all employees.

All employees will be made aware of their responsibility in achieving conformance with the environmental policy and the requirements of the EMS. Table 2-1 summarises the basic requirements for different levels of employees.

Table 2-1 Minimum expectations for site Personnel

Title	Responsibility
Top Management	Define and approve issue of the environmental policy Nominate an environmental management representative Review the EMS at set intervals
Management	Provide sufficient resources essential to the implementation and control of the EMS
Management Representative	Ensure establishment of EMS and reporting on performance to the top management
Site personnel	Responsibilities are dependent upon their role Key part of day-to-day implementation of EMS

2.5 Technically Competent Manager (TCM)

To operate under a Permit, trained and competent staff are required. On this basis, Mr Gareth Danter Hill is employed as the TCM.

The TCM is not the sole individual responsible for ensuring compliance with the Permit or implementing the EMS as this requires input from the whole company and all relevant personnel involved with the permitted activities.

The WAMITAB certification for Mr Hill is included in Appendix 4.

2.6 Relevant Training

All relevant staff working on the permitted activities will be trained on the requirement of the Permit and the EMS.

Management will ensure that all relevant staff are:

- trained in aspects that can lead to pollution and the measures to be taken to prevent that pollution.
- trained to deal with accidents.
- aware of responsibilities under the Permit.
- aware of the importance of equipment and plant maintenance.
- competent to operate machinery and provided with safe operating instructions for that equipment or activity.
- appropriately inducted, including contractors.

Records of training will be maintained.

The management is fully committed to protecting the environment and demonstrating continual environmental improvement. Through effective training, communication and delegation, management will encourage all employees to be committed to the full implementation of this EMS.

3 WASTE OPERATION OVERVIEW

3.1 Operating Hours

The site will be operational 8am to 5pm Monday to Friday and 8am to 1pm Saturday. The site will not operate on Bank Holidays.

3.2 Inductions and Visitors

Visitors to the site will sign the visitor's book upon arrival and departure. Visitors will be notified of the requirements for users of the site.

3.3 Waste Activities

The permitted activities are summarised in Table 3-1 with further detail provided in Table 3-2.

Table 3-1 Permitted Activities

Description of activities	Limits of activities (see also Table 3-2)
D15: Storage of wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) 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) R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials	There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes. The maximum quantity of hazardous waste treated for disposal or recovery shall not exceed10 tonnes per day. This does not include the manual depollution and dismantling of waste motor vehicles. Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery. The maximum quantity of hazardous waste stored at the site shall not exceed 50 tonnes at any one time of which no more than 10 tonnes shall be stored for disposal. This does not include waste motor vehicles awaiting manual depollution. No more than 25 tonnes of intact waste vehicle tyres (waste code 16 01 03) shall be stored at the site. Scrap metal: Treatment consisting of sorting, separation, grading, and cutting using hand-held equipment only, of ferrous metals or alloys and non-ferrous metals into different components for recovery. Vehicle dismantling: Treatment consisting of depollution of waste motor vehicles and sorting, separation, or cutting using hand-held equipment only, of metal wastes into different components for recovery.

Table 3-2 Scope of Activities

Activity	Description
Storage	Storage of non-ferrous and ferrous metals Storage of ELV prior to and following depollution. Storage of non-ferrous and depolluted ELV as loose stock. Storage of batteries, tyres, alloy wheels and engine blocks removed from ELV in separate containers
Sorting, Separation and Grading	Manually and mechanically sorting and separating non-ferrous and ferrous metal Manually sorting of non-ferrous metal into separate components (copper, lead, brass) Manually grading (separating) ferrous metal of different grades – each grade managed within a single stockpile Separation of items from ELV
Hand-held cutting	Use of oxyacetylene torches and mechanical jaw cutters to size reduce and separate metals
ELV depollution	Removal of batteries, tyres, wheels and fluids to produce depolluted ELV

The list of permitted wastes is summarised in Table 3-3. Other residual wastes will be generated during depollution.

Table 3-3 List of Acceptable Wastes

Waste Code	Description
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**
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	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 01	**end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)**
16 01 03	end-of-life tyres
16 01 04*	end-of-life vehicles
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 07*	oil filters
16 01 11*	brake pads containing asbestos
16 01 12	brake pads other than those mentioned in 16 01 11
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	components not otherwise specified (consisting of discarded components only)
16 06	**batteries and accumulators**
16 06 01*	lead batteries
16 06 05	other batteries and accumulators
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 04	**metals (including their alloys)**
17 04 01	copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	iron and steel
17 04 06	Tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**
19 01	**wastes from incineration or pyrolysis of waste**
19 01 02	ferrous metals 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 the 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*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries (consisting of lead batteries only)
20 01 40	Metals

3.4 Site Layout

The site layout is shown in Figure 1. As can be seen the operation is essentially split between:

- one building for non-ferrous storage and vehicle depollution and dismantling
- an impermeable yard with sealed drainage for scrap metal receipt, processing and storage

This layout minimises pollution and protects the environment.

3.5 Waste Acceptance

Waste acceptance is documented in Procedure PR1 (see Appendix 2).

3.5.1 Pre-Waste Acceptance

Most of the waste processed is brought to site from commercial operations by PMR vehicles collecting secure containers placed at customers sites. This allows empty containers to be placed with the customer and provides opportunity for PMR to visually inspect the waste prior to acceptance onto the PMR vehicle and onward transport to the Carew site. This significantly reduces the opportunity of non-conforming waste being accepted.

3.5.2 Waste Inspection

All wastes received at the site will be visually inspected to confirm their description. Following acceptance, the gross weight of the delivery vehicle and the waste will be weighed at the calibrated site weighbridge. The waste will then be unloaded into the reception areas. The gross weight of the delivery vehicle will then be weighed and used to determine the weight of waste accepted.

3.5.3 Waste Segregation

Following acceptance and weighing, the waste is unloaded at the waste reception area. This may involve directly tipping onto the stockpile of non-ferrous metals, where applicable, to minimise drop heights. Where necessary, the mixed metals are separated using a combination of manual handling, a tracked excavator with grab and a forklift depending upon the nature of the waste. Scrap metal will be sorted primarily by size and also grade with ferrous material retained in the outdoor yard and non-ferrous placed into separate containers within the indoor non-ferrous storage area. Oversize ferrous metals are transferred to the hot works area for size reduction to facilitate transport.

Vehicles for depollution will be picked up by the forklift and taken to the ELV storage area pending depollution.

3.6 Weighbridge

A record will be made of the quantity of waste delivered to the site based upon the weight of incoming vehicles over the calibrated weighbridge.

4 PROCESS OVERVIEW

4.1 ELV Depollution

In order to depollute an ELV, a number of operations have to be conducted. The minimum steps are outlined in Table 4-1.

Table 4-1 Minimum technical requirements for ELV depollution

1. Treatment operations for depollution of end-of-life vehicles: - removal of batteries and liquefied gas tanks, - removal or neutralisation of potential explosive components, (e.g. air bags), - removal and separate collection and storage of fuel, motor oil, transmission oil, gearbox oil, hydraulic oil, cooling liquids, antifreeze, brake fluids, air-conditioning system fluids and any otherfluid contained in the end-of-life vehicle, unless they are necessary for the re-use of the parts concerned, - removal, as far as feasible, of all components identified as containing mercury. 2. Treatment operations in order to promote recycling: - removal or catalysts, - removal of metal components containing copper and aluminium - removal of tyres

The typical step-wise approach to be followed during depollution is set out in Table 4-2 and Chart 4-1 summarises the key stages of the overall process. The key depollution processes are undertaken using air drills to avoid sparking and sources of ignition with the fluids recovered using a proprietary purpose built system called an Autodrain.

Table 4-2 Typical depollution steps

DEPOLLUTION STEPS
Step 1. Outside on impermeable surface with sealed drainage:
Remove battery
Remove fuel filler cap and oil filler cap
Set heater to maximum
Remove wheels and tyres and separate balance weights
Step 2. Put vehicle into depollution bay and place on stand using forklift:
Drain engine oil via gravity and remove oil filter for crushing or disposal
Drain transmission oil, including rear differential if applicable
De-gas air conditioning unit (if fitted)
Drain coolant
Drain brake fluid
Remove catalyst (if fitted)
Drain washer bottle
Drain brake/clutch reservoir(s)
Drain power steering reservoir (if fitted)
Drain fuel tanks using suction
Drain shock absorbers or remove suspension fluid
Replace drain plugs/fit plastic stoppers
Step 3. Remove vehicle from depollution bay and take outside onto impermeable surface with sealed drainage:
Deploy airbags and other pyrotechnics in-situ (if fitted and able to safely conduct this operation)

As shown in Plate 5-1, the Autodrain kit is mobile and enables all fluids to be efficiently and carefully removed. The kit includes:

- Oil Gravity Drainer with adjustable bowl
- Coolant suction including coolant Spike and probe kit
- Oil suction including probe kit
- Brake Fluid suction including probe kit and brake nipple connectivity Petrol Scavenger (Stainless Steel)
- Diesel Scavenger (Stainless Steel)
- Low Level Oil tray on wheels
- Air Con Recovery kit

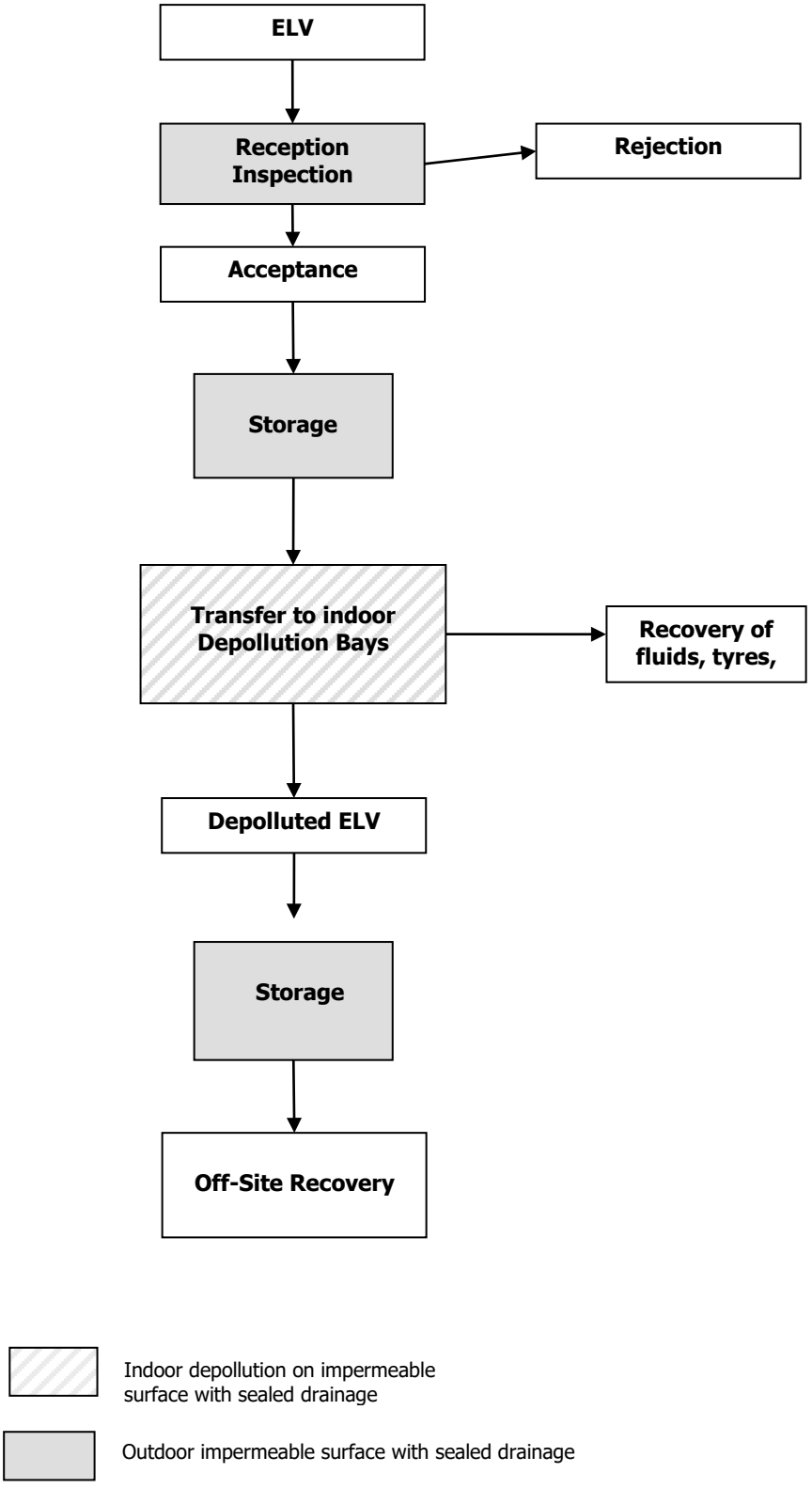

Chart 4-1 Process Flowchart

Plate 4-1 Manufacturers image of Autodrain depollution kit

Fluids captured in the Autodrain tanks will be transferred, as required, through sealed pipework to bunded storage tanks located externally, as shown on Figure 1.

4.2 Scrap Metal

As part of the recovery process, after acceptance over the weighbridge and further visual inspection, scrap metal is sorted, separated and graded into either ferrous or non-ferrous components and stored separately. This is a key element of the recovery process.

4.2.1 Ferrous Scrap

As part of the recovery process, ferrous scrap is sorted, separated, graded and placed into external storage. Some of the oversize scrap is reduced in size using hand-held torches within a dedicated hot works area to aid handling and transport.

Sorting of ferrous scrap typically only requires sorting to ensure that it is all of a similar size for transport. On some occasions, different grades of ferrous are separated from each other but within the same stockpile.

4.2.2 Non-ferrous Scrap

As part of the recovery process, non-ferrous scrap waste (lead, copper, brass) is sorted and separated into dedicated containers within the non-ferrous part of the site building prior to off-site transport and recovery.

4.3 Waste Handling

All wastes will be handled in a way that minimises environmental emissions such as dust and noise. Each waste is stored in dedicated site areas as shown on Figure 1.

5 ENVIRONMENTAL PROTECTION MEASURES

5.1 Site Surfacing

5.1.1 Indoor Areas

The whole yard occupies ~2620m^2 including the site offices, weighbridge and the building.

The secure building used for depollution and non-ferrous metal storage occupies ~330m^2. The unit is shown in Plate 5-1. This prevents rainwater ingress to the vehicle depollution area.

Plate 5-1 Building to be used for vehicle depollution and non-ferrous storage

The steel framed and clad building comprises concrete floors. This limits the possibility of any liquids escaping from the building. Each doorway is also provided with a gulley drain to capture any leaks / spillages migrating outdoors. These drains direct all run-off to the underground sealed tank. All ELVs will therefore be processed indoors on impermeable concrete with sealed drainage subject to preventative inspections and maintenance.

5.1.2 External Areas

The external areas of the yard comprise concrete.

The concreted area (~2300m^2) provides primary containment for external storage and scrap metal processing. This area is bunded using 100m breeze blocks on flat and drains to a sealed underground tank.

5.2 Drainage

All ELV depollution activities will be undertaken indoors within the dedicated covered bay with sealed drainage. Any spillages will be contained and managed within the bay and prevented from escaping to external areas.

The external concreted area used for waste storage and scrap metal processing directs rainfall run-off towards a sealed underground storage tank.

6 LIQUID MANAGEMENT

6.1 Fuel for Site Plant / Vehicles

Fuel for plant is delivered to the site and stored within a bunded tank located within the non-ferrous waste storage area. All deliveries are supervised.

The on-site storage vessel is transferred to the plant requiring fuel, as required, and so all re-fuelling occurs under the control of PMR and on sealed drainage.

6.2 Fuel and oil recovered during ELV depollution

Fuel and oil recovered during depollution will initially be stored in the integrated Autodrain tanks. From here, the fuel is then piped through a sealed system to external bunded storage tanks. A lock will be fitted to the tank valve to prevent unauthorised operation. All valves and gauges on the bund will be constructed to prevent damage caused by frost. The tank will be clearly marked showing the product within and also its capacity. Checks will be made of all bunds / fuel stores as part of the Weekly Checklist.

Further, all fuels and oil will be stored on the impermeable concrete with sealed drainage to provide an extra layer of environmental protection.

6.3 Gas Cylinders

Gas cylinders (whether full or empty) will be stored in a secure, well ventilated covered caged area, sited away from drains and sumps which can hold and accumulate heavier-than-air gases. This location is shown on Figure 1.

- Follow Procedure PR2 for storing and handling cylinders

6.4 Battery Storage

Batteries will be stored upright in clearly labelled, acid-resistant, leak-proof containers within the non-ferrous waste storage area.

Different types of battery, such as lead acid and lithium-ion batteries will be stored separately.

7 MAINTENANCE AND SECURITY

7.1 Preventative Maintenance

A Planned Preventative Maintenance programme is to be followed. This comprises checks of all site infrastructure, maintenance contracts with relevant suppliers and self-maintenance.

The forms to be used to document the programme are included in Appendix 3.

7.2 Site Security

The site benefits from CCTV.

7.3 Provision of Site Identification Board

A large visible sign identifying the site shall be placed at the site entrance and will display the following information:

- the site name and address
- the operator's name if different (company name at least)
- an emergency contact name and the permit-holder and/or operator's telephone number
- a statement that the site is permitted by NRW
- the permit number
- NRW emergency contact numbers, currently 0300 065 3000
- the days and hours when the site is open to receive waste

8 EMERGENCY PLAN

Emergency contact details are summarised in Table 8-1.

Table 8-1 Emergency Contact Details

SITE DETAILS			
Site address: PMR Ltd, Carew Pavilion, Carew Airfield, Tenby			
Postcode: SA70 8SX			
Site Access Grid Reference: SN 05881 02639			
Site access what3 words: carriage.sprain.flamenco			
SITE CONTACTS	Name	Office Hours (specify)	Out of hours
Owner:	Mathew Jones	07795 002026	07795 002026
Landowner/Agent:	Phil Davies	01646 651442	07836 549939
EMERGENCY SERVICES		Office Hours	Out of hours
Emergency		999	999
REGULATORS		Office Hours	Out of hours
Health and Safety Executive (HSE)		0345 300 9923	0151 922 9235
Local Authority:		01437 764551	0845 601 5522
NRW (24 hour emergency hotline)		0300 065 3000	0300 065 3000
UTILITY/KEY SERVICES	Name	Office Hours	Out of hours
Water undertaker:	Welsh Water	0800 052 0145	
Electricity supplier:	SWALEC	0843 770 5091	
Fuel supplier:	Oil 4 Wales	01267 275 777	
Oil spill contractor:	Cres	01267 223500	
NEIGHBOURS	Name	Office Hours	Out of hours
Carew Karting		07974 540689	07974 540689
Hazelbrook Caravan Park		01646 651351	01646 651351
National Grid (pylon operators)	Emergency number	0800 40 40 90	0800 40 40 90
KEY SITE SENSITIVES			
Located on principal aquifer – in event of fire, place sand bags along site entrance, minimise fire water use and ensure perimeter bunding not being breached			
Caravan site to north and go kart facility to west – in event of fire inform owners of incident			

8.1 Accidents and Incidents

The Emergency Procedures Plan (PR4) details the approaches that should be followed in the event of an accident or pollution incident. PR5 details the specific actions to be taken in the event of a spillage. Any incident should be recorded in the Site Diary and reported in accordance with Procedure PR6.

8.2 Management of Environmental Risks

Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution.

8.3 Leaks and Spills

EMS Procedure PR4 details the spillage procedure and should be followed in the event of a spill.

Spill equipment will be available and site staff are responsible for and trained in its use.

To minimise the risk of leaks and spills, the following operational procedures shall be implemented:

- All fuels and oils will be stored in bunded tanks.
- Delivery of fuels and oils will be supervised by a responsible member of staff.
- The quantity of fuel in storage will be checked, either using a sight glass or by dipping, prior to the fuel delivery being made. The maximum residual capacity of the tank will be determined prior to the commencement of re-filling, to prevent overfill.
- All hydraulic, lubricating and waste oils will be stored on/above a suitable spillage containment tray, which will collect any leaks from the drums.
- All drums and similar containers stored within the facility will have their contents and capacity clearly marked.
- To prevent spillages, drum openings will be carried out on a spillage tray.
- Sand and absorbent granules are to be kept on site always for immediate use to soak up minor spillages.
- In the event of a major spill, immediate action will be taken to contain the spillage and prevent contamination of surface water run-off.
- A supply of lime will be maintained to neutralise any spillage of battery acid.
- Records shall be recorded in the site diary to show how the spillage occurred (if known), what the spillage was and the remedial actions taken.
- Operational staff will receive pollution prevention and spill response training.
- Any spillages will be investigated to establish the root cause of the problem and, lessons to eb learnt

8.4 Fire Prevention and Control

In the event of a fire occurring on site, the procedures described within the Fire Prevention and Mitigation Plan will be followed.

8.5 Surface Water and Groundwater Pollution

The site is located above a Principal Aquifer which requires protection. All site containment and drainage systems will be inspected at least weekly, throughout the operational life of the site for cracks, defects and cleanliness, by appropriate site staff. The results of each site inspection shall be recorded. All maintenance and repair works will be carried out at the earliest opportunity and with due consideration given to the nature and scale of the issue.

The outside storage area will be checked daily as part of the daily site inspection. The following control measures will be implemented to minimise potential impacts on surface and groundwater:

- Company spillage procedure will be followed in the event of a spill.
- Regular maintenance of operational areas such as drainage channels will be carried out.
- Containers and bunds will be inspected and maintained.

- Written management systems will be in place for the identification and minimisation risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances.

8.6 Drainage Infrastructure

All parts of the drainage infrastructure will be inspected at least weekly.

8.7 Noise and Vibration

Site noise will occur because of the normal movement and manoeuvring of plant and vehicles, scrap metal handling and cutting.

The measures set out in Procedure PR08 and the Noise Management Plan will be taken to minimise the risk of noise and vibration nuisance.

8.8 Dusts, Fibres and Particulates

Due to the nature of the waste and inspection procedures in place, there is little likelihood of excessive dust generating waste being received at the facility.

Operations potentially giving rise to dust generation include:

- Waste receipt and stockpiling which could dislodge materials attached to the metals.
- The on-site transfer of materials between the treatment and the stockpiling/storage areas.
- The loading of processed materials onto transport vehicles.
- Hot works

The site will be routinely swept to prevent particle lift-off and stockpiles will only be handled as necessary to limit opportunity for release of particles, particularly during dry weather. This will also limit the possibility of metal fragments causing tyre blow outs and vehicle down time.

As site is not typically open to public there are very few vehicle movements with most vehicle movements being undertaken by PMR personnel and other waste carriers familiar with measures required to prevent particle lift-off.

If required, dust suppression using water sprays will be used.

8.9 Litter

Due to the nature of the waste and inspection procedures in place, the likelihood of windblown litter from site is minimal.

The site will be routinely swept to prevent particle lift-off and is surrounded by fence to prevent light fraction waste escape, if present.

8.10 Pests

Due to the nature of the waste and inspection procedures in place, there is little likelihood of animal by-products and food waste that attract pests being received at the facility. The site will not typically accept large quantities of post-consumer food tins.

The following measures will be taken to minimise the risk of pests:

- Waste inspected before tipping to identify potential contaminants.
- Quarantine non-conforming putrescible wastes and removal off-site within 72 hours.
- Visual monitoring for pests/vermin performed daily including inspections for evidence of droppings, damage to property/plant or ground disturbance e.g. burrow, nests and excessive infestation present.
- Good housekeeping and regular inspection of mess facilities.

In the event of a pest infestation being detected the following measures will be implemented:

- Suitable treatment will be implemented either by employees or by suitable contractors, this may involve the application of insecticides or the setting of traps and poisons, or other measures as appropriate.
- Any waste identified as attracting scavengers shall be isolated and removed from site.

Details of any pest control activities will be recorded during the site inspection and if necessary, raised as a CAR.

8.11 Odours

Due to the nature of the waste and inspection procedures in place, there is little likelihood of odorous waste being received at the facility.

The following measures will be taken to minimise the risk of odour release:

- Rigorous site management practices.
- Waste inspected at the weighbridge and during tipping to identify odour and/or potential odour generating contaminants.
- The rejection (and recording) of odorous wastes.
- The prevention of odorous waste being accepted in future loads by recording and noting the waste producer/carrier as per the 'duty of care' records.
- Where identified onsite, odorous waste shall be isolated, stored in covered containers to prevent the release of odour and removed as soon as possible from site.
- An odour inspection at the site boundary will be carried out by the site manager at least twice per day.

Should odour be identified at the site boundary, this will be recorded in the site inspection report.

Measures to address the odour issues shall be taken immediately. These may include the removal offsite of offending materials, activities being reduced or stopped until operations are able to commence without elevated odour levels or industrial deodoriser being applied.

8.12 Other Fugitive Emissions

Due to the nature of operations, other fugitive emissions have been risk assessed which determined that emissions are below threshold levels. The contribution to local Air Quality levels via onsite exhaust emissions is negligible when compared to emissions from nearby highways. The facility will, however, ensure that it is not a generator of significant additional emissions.
The following measures will be taken to control other fugitive emissions:

- All plant machinery will be subject to regular inspection and maintenance.
- Fuel / oil tanks and associated transfer pipework will be appropriately designed, sized and installed.
- Vehicles shall be compliant with relevant exhaust emissions standards.

8.13 Complaints

The company's complaints procedure (Procedure PR3) applies to all complaints, feedback and requests made by third parties regarding operational activities.

Complaints are to be investigated immediately by the Site Manager. The nature and details of the complaint will be logged on a complaints record form, along with the findings of the investigations and any action required. The Site Manager is responsible for determining the appropriate action to be taken and will communicate the nature of the actions to be taken and timescales to the Complainant.

All complaints from third parties including external customers, potential customers, statutory authorities, statutory consultees, members of the public and internal clients will be forwarded to the Site Manager to action as below.

The Site Manager will ensure that:

- All complaints are logged.
- The complaint is investigated to identify the cause. If a complaint is relayed to the company by a 3rd party (e.g. Natural Resources Wales), this may require direct communication with the complainant in order for the complaint to be effectively investigated.
- Necessary preventative action is taken to both address the cause of the complaint and that measures are implemented to prevent a reoccurrence of the same problem. These actions must be documented.
- The Complainant will be contacted and given information on the investigations conducted and actions taken as appropriate.
- Where a complaint or query is likely to involve a statutory authority, the emergency services, an insurance company, or the media, the Managing Director will be informed.
- Complaints linked to contracts with specific complaints procedures will be reported in line with contractual requirements and timescales. Local procedures may need to be in place to ensure these are adhered to.
- All complaints are discussed at site meetings and reviewed at monthly management meetings.
- If the investigation indicates that the complaint has not been justified this will be clearly recorded on the Incident Report.

In the event of a complaint being verified as resulting from the operation of the facility the Site Manager is responsible for identifying short and long-term mitigation measures to

minimise the risk of future incidents. The efficacy of any mitigation measures will be confirmed through further monitoring at the receptor (subject to the Complainant's agreement) or at a representative position along the site boundary.

Complaints logs, in combination with meteorological data and site monitoring information, will be used to assess any trends.

9 REPORTING AND DOCUMENTARY CONTROL

9.1 Documents

As a minimum, all records required by the Standard rules shall:

(a) be legible.
(b) be made as soon as reasonably practicable.
(c) if amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval.
(d) be retained, unless otherwise agreed with NRW, for at least 6 years from the date when the records were made, or in the case of the following records, until licence surrender.

9.2 Security and Availability of Records

All site records, including the site diary, will be kept at the site office. The records will be sequentially filed and kept secure to prevent loss, damage or deterioration.

9.3 Notifications

NRW shall be notified without delay following the detection of:

(a) any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant pollution.
(b) the breach of a limit specified in the set of Standard Rules.
(c) any significant adverse environmental effects.

Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted to NRW within 24 hours.

NRW shall be notified within 14 days of the occurrence of the following matters:

- the death of any of the named operators (where the operator consists of more than one named individual).
- any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

9.4 Waste Returns

Each year, within one month of the end of the year, NRW expects operators to submit waste returns documenting waste movements. The return needs to be submitted using the template provided by NRW. The latest version of the waste return template can be obtained from: waste.returns@cyfoethnaturiolcymru.gov.uk

The waste returns reference is :

10 FEES TO NRW

There is an annual subsistence fee payable to NRW. The annual charge is due on demand in the year that NRW issue the permit and then on 1 April each year. The charge starts from the date NRW authorises the permit.

11 COMMUNICATION AND COMPLAINTS

11.1 Internal Communication

The operator is committed to ensuring that the requirements of the Permit and the EMS will be fully implemented. One of the key ways of achieving this is through clear communication with all employees to ensure that the requirements are understood, available and fully integrated to routine site work. This will be achieved by various means including signage, meetings, environmental awareness training sessions, tool-box talks, inductions and posters. Particular attention will be paid to ensure that sub-contractors are aware of the relevant requirements.

11.2 External communications

Dialogue with external parties may include submittal of information to external parties, receipt of requests for information, receipt of complaints and dialogue with NRW. In the majority of cases, the Technically Competent Manager (TCM) or Site Manager will be the initial point of contact. All communication will be documented.

Specific measures for dealing with complaints will be based on those detailed in Procedure PR3 in Appendix 2.

The operator takes complaints seriously and will take the necessary actions to investigate the complaint. If a complaint is valid the operator will:

- identify the cause.
- minimise the impact of the activity causing the problem.
- investigate the root cause of the problem.
- take steps to ensure the problem is not repeated.
- record the complaint and what actions were taken to investigate and resolve it.
- amend the EMS if necessary.

All complaints will be recorded.

12 MONITORING AND MEASUREMENT

12.1 Proof of Control

The operator recognises that a key aspect of any EMS is to document the operation of the EMS so that its effectiveness can be scrutinised and any shortcomings identified. This will be achieved through thorough relevant training and routine assessment of working instructions and records for both employees, contractors and suppliers. Such records will be recorded using the forms in Appendix 3.

12.2 Monitor and Measure

The operator will document implementation of the proposed waste operation and pollution control measures using the forms in Appendix 3 and Site Diary. Records shall include waste acceptance, waste delivery and preventative maintenance programmes.

13 EMS AUDIT

13.1 Internal EMS Audits

The environmental management representative will establish a rolling audit programme that ensures each aspect of the EMS is audited at least annually. More frequent audits will be undertaken on the more sensitive procedures and aspects. The principle aim of the audit will be to determine whether or not the EMS conforms to planned expectations and is being effectively implemented and maintained. The environmental management representative will provide feedback regarding the audit process to management. The audit findings will be recorded.

14 NON-CONFORMANCE, CORRECTIVE & PREVENTIVE ACTION

14.1 Continual Improvement

Through monitoring of performance, the operator will seek to identify non-conformance issues requiring action to ensure continued environmental performance and full implementation of the EMS. The operator will seek to identify non-conformance issues through a variety of means including outcomes of audits, incident reports, reviews of legislation requirements and complaints.

14.2 Investigation of Failings

Following identification of non-conformance issues, the environmental management representative will lead an investigation into the root causes and identify ways in which the issues can be avoided in the future. The review will also aim to identify any ways in which the EMS may be improved. This may require specialist input from internal and external parties. This process will lead to corrective and preventative action plans being developed and tracked.

15 PERMIT SURRENDER

Should the operator wish to surrender the Permit at some point, NRW will need to be convinced that necessary measures to avoid any pollution risk resulting from the waste activities have been taken.

The legal test for surrender is – "that the necessary measures have been taken:–

(a) to avoid a pollution risk resulting from the operation of the regulated facility; and
(b) to return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation."

Provided the site is operated in accordance with the Permit and records are maintained that show waste acceptance and pollution control measures have been implemented, the land quality should not be altered. During operations, PMR will ensure that the relevant records are maintained. This will ensure that several lines of evidence demonstrating the legal test has been satisfied are gathered during operations.

To assist with this process, an assessment of current land quality could be undertaken and documented in a Site Condition Report. This could then be maintained during the life of the operation and ultimately used during Surrender.

References

How to Comply. Natural Resources Wales.
https://cdn.cyfoethnaturiol.cymru/media/2110/how-to-comply-with-your-environmental-permit.pdf?mode=pad&rnd=131467604540000000

Removal of LPG Tanks – Guidance -
https://www.gov.uk/government/publications/removal-of-lpg-tanks-guidance

End of life vehicles (ELVs): guidance for waste sites - https://www.gov.uk/guidance/end-of-life-vehicles-elvs-guidance-for-waste-sites

Depolluting end-of-life vehicles: guidance for treatment facilities -
https://www.gov.uk/government/publications/depolluting-end-of-life-vehicles-guidance-for-treatment-facilities

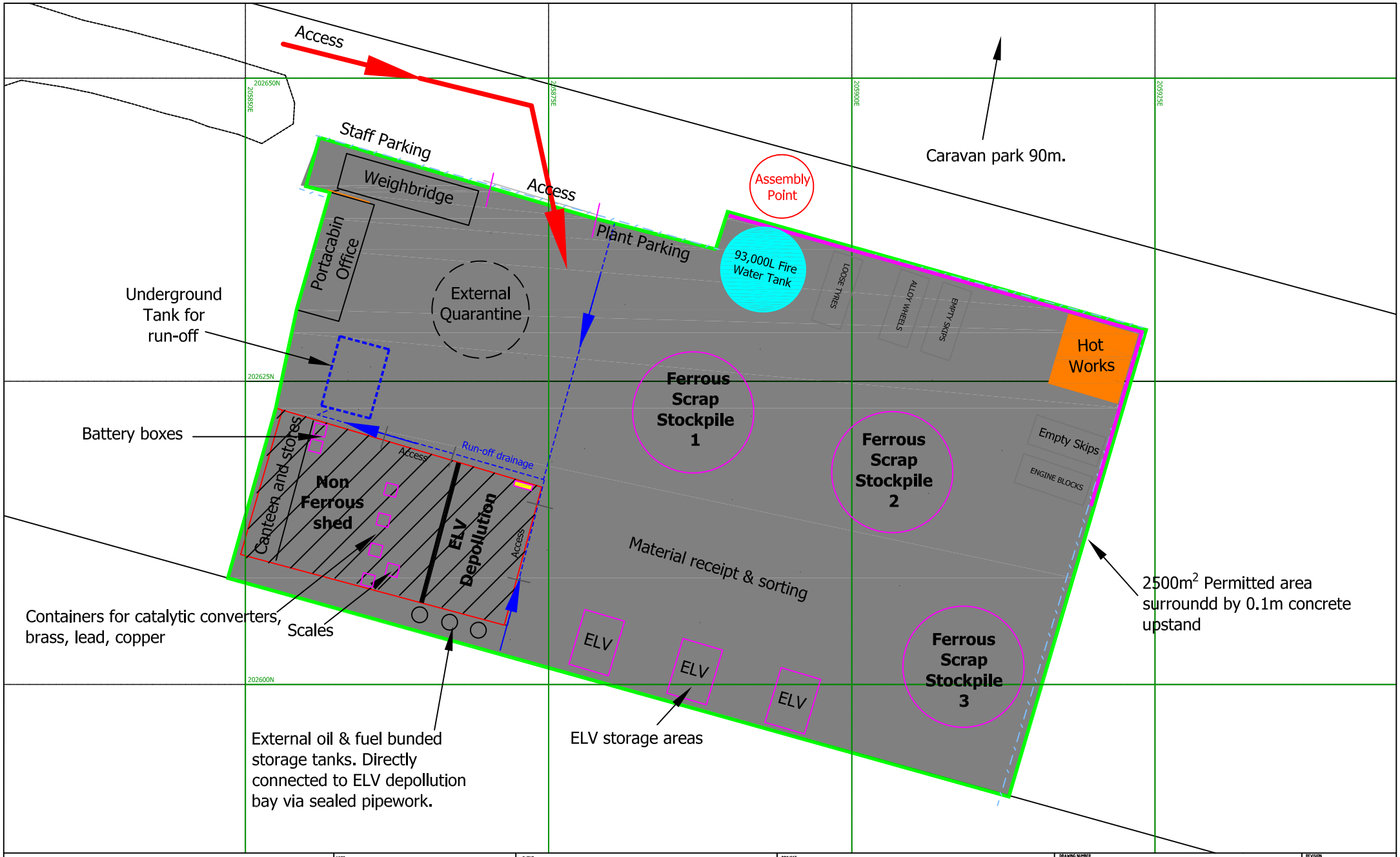

Figure Number 2135/1

Legend

- Concrete
- Building
- Permit boundary
- Solid hoarding
- Electrical box

NOTE

CLIENT: Pembrokeshire Recycling Ltd

PROJECT: ELV ATF

TITLE: Site Layout and Access

Rev	Date	Status/Ammendments

DRAWING NUMBER: 2135/1

REVISION: 0

SCALE: As Shown

DATE: 07/22

DRAWN: BR

CHECKED:

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PEMBROKESHIRE METAL RECYCLING BESPOKE PERMIT

ENVIRONMENTAL MANAGEMENT SYSTEM

Appendix 1 Environmental Permit

Report Number 2135r3v1d0621

PEMBROKESHIRE METAL RECYCLING BESPOKE PERMIT

ENVIRONMENTAL MANAGEMENT SYSTEM

Appendix 2 Procedures

Report Number 2135r3v1d0621

PR1. Waste Acceptance Procedure

Pre-acceptance checks

Pre-acceptance checks will be carried, where feasible, to limit the opportunity of non-confirming waste being delivered. This will most likely be done when PMR personnel collect waste from customer facilities. Before collecting and taking control of the container holding the waste a visual check will be made. This will be aimed at identifying waste that is not acceptable under the Permit or waste that could pose a risk to the environment e.g. lithium batteries, biodegradable / food waste.

Waste Acceptance

1. On delivery, the ELV / scrap is visually inspected with particular attention given to potentially hidden wastes such as black bags, gas cylinders and Lithium-ion batteries in ELV.
2. If non-permitted wastes are found or the ELV is NOT as described or is not accepted within the terms of the Permit, it shall be REJECTED.
3. If the waste and associated paperwork is acceptable the waste is transferred to the impermeable sealed storage area
4. The following information shall also be recorded:

    a) Weight of waste
    b) Category/EWC Code of the waste
    c) Time of delivery
    d) Vehicle Registration
    e) Site address of waste
    f) Name of waste carrier

- Waste deliveries will be recorded electronically.

Following delivery of the waste into the correct storage area the ELV will be visually inspected again.

- Use Form SF02 or Site Diary for recording non-conformance wastes.

If, in the interests of the environment, it would be best to allow the load to be stored on site, then the waste shall be retained on site in the quarantine area.

If necessary, NRW shall be informed by telephone immediately and a record kept of the conversation and with whom.

Steps taken to safely dispose of the waste (after liaison with NRW) should be documented– typically this will involve returning it to the waste producer.

Metal Scrap Waste List of Acceptable Wastes

The list of wastes acceptable at the site are set out in the Permit and listed below.

Waste Code	Description
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**
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 CLOTHINGNOT OTHERWISE SPECIFIED**
15 01	**Packaging (including separately collected municipal packaging waste)**
15 01 04	metallic packaging
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 01	**end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)**
16 01 03	end-of-life tyres
16 01 04*	end-of-life vehicles
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 07*	oil filters
16 01 11*	brake pads containing asbestos
16 01 12	brake pads other than those mentioned in 16 01 11
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	components not otherwise specified (consisting of discarded components only)
16 06	**batteries and accumulators**
16 06 01*	lead batteries
16 06 05	other batteries and accumulators
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 04	**metals (including their alloys)**
17 04 01	copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	iron and steel
17 04 06	Tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**
19 01	**wastes from incineration or pyrolysis of waste**
19 01 02	ferrous metals 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 the 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*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries (consisting of lead batteries only)
20 01 40	Metals

PMR Ltd

PR2. ELV Depollution

All of the following activities must be carried out indoors within an impermeable depollution bay.

In order to depollute an ELV, a number of operations have to be conducted. The Permit requires the treatment steps in Table 1 to be undertaken.

Table 1 Minimum technical requirements for ELV depollution

1. Treatment operations for depollution of end-of-life vehicles:
   - removal of batteries and liquefied gas tanks,
   - removal or neutralisation of potential explosive components, (e.g. air bags),
   - removal and separate collection and storage of fuel, motor oil, transmission oil, gearbox oil, hydraulicoil, cooling liquids, antifreeze, brake fluids, air-conditioning system fluids and any other fluid containedin the end-of-life vehicle, unless they are necessary for the re-use of the parts concerned,
   - removal, as far as feasible, of all components identified as containing mercury.
2. Treatment operations in order to promote recycling:
   - removal or catalysts,
   - removal of metal components containing copper, aluminium and magnesium if these metals are not segregated in the shredding process,
   - removal of tyres, glass and large plastic components (bumpers, dashboard, fluid containers, etc.), if these materials are not segregated in the shredding process in such a way that they can be effectively recycled as materials.

The typical step-wise approach to be followed during depollution is set out in Table 2 and Chart 5-1 summarises the key stages of the process. The key depollution processes are undertaken using air drills to avoid sparking and sources of ignition with the fluids recovered using a proprietary purpose-built system called an Autodrain.

Table 2 Typical depollution steps

DEPOLLUTION STEPS
Step 1. Outside on impermeable surface with sealed drainage:
Remove battery
Remove fuel filler cap and oil filler cap
Set heater to maximum
Remove wheels and tyres and separate balance weights
Remove any parts identified as containing mercury
Step 2. Put vehicle into depollution bay and place on stand using forklift:
Drain engine oil via gravity and remove oil filter for crushing or disposal
Drain transmission oil, including rear differential if applicable
De-gas air conditioning unit (if fitted)
Drain coolant
Drain brake fluid
Remove catalyst (if fitted)
Drain washer bottle
Drain brake/clutch reservoir(s)
Drain power steering reservoir (if fitted)
Drain fuel tanks using suction
Drain shock absorbers or remove suspension fluid
Replace drain plugs/fit plastic stoppers
Step 3. Remove vehicle from depollution bay and take outside onto impermeable surface with sealed drainage:
Deploy airbags and other pyrotechnics in-situ (if fitted and able to conduct this operation)

PR3. Managing and Responding to Complaints

On receipt of a complaint, the recipient shall enter the relevant details onto Complaint Record Form or Site Diary.

The Site Manager should be informed immediately and should be responsible for working out the next steps depending upon the nature of the complaint. The proposed next steps should be communicated to the person who has made the complaint.

The Site Manager will identify if other personnel need to be involved with investigating the source of the complaint or fixing the identified problem.

An immediate visual site inspection and/or sniff test will be conducted where relevant. The aim will be to identify any issues of concern.

Emergency procedures within the Environmental Management System Plan or relevant procedure shall be initiated immediately if a verified event is in progress and that it is determined to be arising as a result of the company's operations.

For all complaints, reference will be made to the site activities at the time of the complaint and further onsite investigations conducted to determine whether any abnormal operations are/were occurring.

Actions required to prevent the problem re-occurring will be worked out. These will be recorded. The person who made the complaint should be provided with an update on the steps to be taken. All complaints should be logged using SF09 and the Customer Complaint Log Form, SF10.

PR4. Emergency Procedures

An assessment of things that could go wrong and harm the environment has been made and is summarised in table below.

The table describes what it is to be done to reduce the chances of each possibility happening. It also describes what should be done if the worst actually happens. All relevant procedures should be followed.

Personnel should also be familiar with the Fire Prevention and Mitigation Plan.

Possible Accident / Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
Spillages			
Spillage during handling and waste transfer	Contamination of land, drains, groundwater and watercourses if outside impermeable areas	Inspect and validate all in-coming wastes. Remove hazardous liquids from wastes prior to processing. Train the staff.	Follow the spill response procedure PR6.
Spillage during delivery/ recovery of oil or fuel.		Supervise fuel deliveries. Use drip trays and spill materials.	
Spillages during refuelling of plant and equipment.		Plant and equipment will be refuelled in designated areas with impervious surface and will use drip trays and spill materials.	
Overfilling			
Overfilling of oil / fuel tanks during delivery.	Contamination of land, drains, groundwater and watercourses if outside impermeable areas	Supervise all deliveries	Follow the spill response procedure PR6.
Failure of Plant or Equipment			
Leakages; due to faulty pipe work, valves, over-pressure, blockages, corrosion, severe weather, ground movement etc.	Contamination of land, drains, groundwater and watercourses if outside impermeable areas	Daily visual inspection and completion of weekly inspection checklist record. Preventative maintenance regime. Any underground pipes and tanks will be tested for integrity. Insulation and protection of pipe work.	Follow the spill response procedure PR6.
Puncture; of vessels and tanks etc. due to impact – such as fork lift trucks.		Tanks and vessels generally located within / on secondary containment facilities. Storage locations of drums and non-permanent vessels protected by use of barriers or fencing. Movement of drums and containers using safe techniques.	

Fire (see also Fire Prevention and Mitigation Plan)			
Fire / Explosion	Smoke and pollution, Firewater causes contamination of land, groundwaterand watercourses.	Separation of incompatible materials and of combustible materials andignition sources. Incorporation of fire breaksinto site layout and containment of fire water. No smoking policy. Maintain tidy site and minimize stockpile of combustible materials. Fire training and emergencydrills.	See Fire Prevention and Mitigation Plan and alsoPR7 and PR14.
Flood			
Due to ingress of watercourse floodwater, blocked drains, burst watermain, use of fire water.	Contamination of raw materials, buildings, land, drainage system, groundwater and watercourses withfire and flood water.	Maintenance of drains. Fitting of flap / non returnvalves on drains. Safe location for storage of hazardous materials.	Follow Procedure PR13
Failure of Containment			
Failure of containmentfacilities due to land movement, impact, corrosion etc.	Contamination ofland, drains, groundwater andwatercourses.	Provision of secondary containment for hazardous liquids. Inspection of primary and secondary containment facilities. Integrity testing of tanks and bunds & pressure lossalarms.	Follow the spill response procedure PR6.
Vandalism			
Unauthorised entry and tampering or malicious damage to property, plantand equipment.	Contamination ofland, drains, groundwater andwatercourses.	Secure gate and perimeterfence. Site locked when un- manned, tanks and valves locked when not in use outof hours. Plant and equipment lockedin secure storage out of hours. Security system installedincluding camera and recording facilities.	Follow the spill response procedure PR6.

PR5. Preventing Water / Land Pollution

Pollution may result from accidental leaks or spillages from waste, plant and vehicles orfrom liquid wastes discovered in loads and destined for quarantine as an unacceptablewaste.

- Use Procedure PR6 for dealing with spillages and leaks.

To ensure site containment and drainage systems are functioning as intended they will be inspected weekly. The results of each site inspection shall be recorded.

Any maintenance and repair works will be carried out at the earliest opportunity.

PR6. Dealing with Spillages and Leaks

Spill equipment will be available and site staff are responsible for and trained in its use. To minimise the risk of leaks and spills, the following operational procedures shall be implemented:

- All fuels and oils will be stored in bunded tanks.
- Delivery of fuels and oils will be supervised by a responsible member of staff.
- The quantity of fuel in storage will be checked, either using a sight glass or by dipping, prior to the fuel delivery being made. The maximum residual capacity of the tank will be determined prior to the commencement of re-filling, to prevent overfill.
- All hydraulic, lubricating and waste oils will be stored on/above a suitable spillage containment tray, which will collect any leaks from the drums.
- All drums and similar containers stored within the facility will have their contents and capacity clearly marked.
- To prevent spillages, drum openings will be carried out on a spillage tray.
- Sand and absorbent granules are to be kept on site always for immediate use to soakup minor spillages.
- In the event of a major spill, immediate action will be taken to contain the spillageand prevent contamination of surface water run-off.
- A supply of lime will be maintained to neutralise any spillage of battery acid.
- Records shall be recorded in the site diary to show how the spillage occurred (if known),what the spillage was, and the remedial actions taken.
- Operational staff will receive pollution prevention and spill response training.
- Any spillages will be investigated to establish the root cause of the problem and, lessonsto be learnt

Spillage or Leakage

This can occur during refuelling of vehicles, fuel deliveries, vehicle servicing, vehicle breakdowns, processing / storage of vehicles for recycling, accidents and/ or damage to tanks and bunds. Care should be taken when dealing with any spillage.

All vehicles, plant and equipment used on site will be operated and maintained with the objective of preventing potentially polluting leaks and spillages of wastes or other potentially polluting materials.

Each tank, skip, drum or other container used to hold wastes which consist of or contain fluidsor hazardous residual wastes will be:

- Loaded and unloaded in accordance with the handling procedures specified in Table 1
- overleaf.
- Filled and emptied in accordance with the filling and emptying procedures specified in Table 1.
- Clearly labelled regarding its contents.
- Inspected and maintained according to the maintenance schedules and proceduresspecified in Table 1.

In the event of damage or deterioration to a container that is leaking or is likely to cause a leak, that container will be repaired or replaced immediately.

In the event of any leaks or spillages occurring on site documented control and remediation procedures shall be implemented immediately and recorded and shall meet the standards specified in Table 1.

Table 1: Procedure for Prevention and Control of Leaks and Spillages

Action	Specified Standards
Loading and unloadingskips, drums and othercontainers	Loading and unloading of skips, drums and other containers shall be supervised atall times by a member of staff. Lids/caps/bungs or other closures shall be in place during loading/ unloading. Loading/unloading shall be carried out in an area provided with engineeredcontainment of the type required for that waste.
Filling and emptying tanks, drums and othercontainers	Filling and emptying of tanks, drums and other containers shall be supervised atall times by a member of staff. Lid/caps/bungs and other closures shall be in place at the end of filling. Containers, tanks and drums shall not be fitted beyond their operational capacity.Filling and emptying shall be carried out in a bunded area. Measurement of low-level void space shall be by physical dipping prior to loading.
Inspection, maintenance,and repair of skips, tanksdrums and other containers	Skips, tanks, drums and other containers shall be inspected daily for leaks. Any fixed tanks found to be leaking shall have their contents immediatelytransferred to an alternative appropriate tank or container. Any skips, drums and/or other containers found to be leaking shall be either immediately transferred to a larger appropriate over-container or shall have theircontents immediately transferred to an alternative appropriate tank or container.
Control and remediation of leaks and spillages	Minor spillages of oil, fuel or other ELV fluid shall be cleaned up immediately usingsand or proprietary absorbent to clean up liquids and placed in alternative containers. Major spillages of oil, fuel or other ELV fluid which are causing or are likely tocause polluting emissions to the environment: Immediately action shall be taken to contain the spillage and prevent liquid fromentering surface water drains, water courses and unsurfaced ground. The spillage shall be cleared immediately and placed in alternative appropriatecontainers. NRW shall be informed immediately.

Any liquid spills will be cleared immediately by depositing absorbents on the affected area. Suitable spillage collection facilities including a supply of absorbent material, decanters and cleanser degreasers will be kept on-site to deal with spillages. Spill kits and spillage collection facilities will be clearly signed. Absorbents used to clean spillages will be suitably contained prior to being taken to an appropriately permitted site for disposal.

PR7. Fire Prevention and Mitigation

All personnel need to be familiar with the site Fire Prevention and Mitigation plan.

In the event of a fire the Fire Prevention and Mitigation Plan will be followed. The followingactions should be taken:

1. The person discovering the fire will raise the alarm and evacuate and isolate the area.
2. Use the appropriate fire extinguisher or other firefighting equipment i.e. fire suppression on plant, if the fire can be controlled without endangering themselves or other personnel.
3. Contact the Site Manager/ Supervisor immediately; if the fire cannot be safely tackled the emergency services should be notified (dial 999).
4. All electrical supplies should be isolated and made safe in the area of the fire.
5. Supervisor/ Manager must inform weighbridge to prevent further entry of vehicles onto site if necessary and to direct all persons to the assembly point, which is outside the site entrance.
6. Manager/ Supervisor must appoint a member or members of staff to assist any known disabled persons during the evacuation to the fire assembly point wherever this is necessary,providing the risk to those involved is low.
7. The Site Manager/ Supervisor or next senior person will make a check of all visitors, contractors and staff to make sure everybody is accounted for.
8. The Site Manager/ Supervisor will, if necessary, send a member of staff to the site entrance to direct the emergency services onto site.
9. The Site Manager/ Supervisor or next senior person will liaise with and direct the emergency services to any casualties.
10. The Site Manager/ Supervisor will send a report of the incident to the Area Manager and if necessary to NRW.
11. All used fire extinguishers should be returned to a supplier for refilling/ replacement.

UNDER NO CIRCUMSTANCES SHOULD THEY BE RETURNED TO THE FIRE POINT

12 All site employees to follow instruction, supervision, training and information provided by Supervisor/ Manager / other competent person.

Full records of all actions taken, and equipment used should be kept and if possible, photographs taken.

PR8. Preventing Noise and Vibration causing Nuisance

Sources of Noise

Noise will occur primarily as a result of the movement of plant and vehicles on site,during use of recycling / cutting equipment and during handling and placement of ELV and scrap metal.

Control Measures

The site is relatively close to residential property and adjacent commercial property. The following measures will be taken to minimize the risk of noise and vibration nuisance:

- All plant machinery will be subject to regular inspection and maintenance.
- Equipment shall be switched off when not in use.
- Treatment operations shall be arranged in such a way as to minimise noise production as far as possible
- Scrap metal will not be dropped from height or scraped along the floor unnecessarily with most movements carefully made utilizing grab or materials handler
- Staff to avoid unnecessary revving of engines

Vehicle depollution should not be a significant source of noise as it will be undertakenwithin the indoor depollution bay, and it is not a typically noisy activity.

Inspections

To ensure that abnormal site conditions are identified that could potentially cause off-sitenuisance, any change to on-site noise levels will be identified by site operatives and management. This will initially be done by subjective on-site assessment of noise levels based on experience and familiarity. As increased or altered noise (i.e. noise levels or types of noise not normally heard) could be indicative of failure of a control measure the cause will be immediately investigated.

Complaints

Complaints are never a substitute for site inspections and effective waste managementpractices, but they do offer a valuable indicator of potential offsite problems related tothe site activity. For this reason, all complaints will be logged and documented.

Any complaints received will be promptly investigated and appropriate remedial actiontaken, where feasible.

PR9. Dealing with litter

As the bulk of the waste to be processed is metal there is little prospect of litter beingdirectly released to the environment from the permitted activities.

To ensure litter generation remains a low risk the following measures will be taken:

- Light waste fractions will be stored correctly and away from drafts and site entry / exit points.
- If litter is found on the site yard or immediate access road the following measures will be implemented where appropriate.

Litter collected either for recycling or disposal.

PR10. Preventing dust problems

As the bulk of the wastes are metal there is little prospect of dust being released to the environment from the permitted activities.

To ensure dust generation remains a low risk the following measures will be taken:

- Minimising drop heights of potential dusty wastes when transferring and loading
- Sweeping of indoor work areas and site yards.
- Visually checking loads leaving the site for dust generating materials
- Minimising vehicle speeds in the yard

Where airborne material is persistently observed to be a problem the following actions will be considered:

- Use of dust suppression comprising of a hose spray within the yard area; and
- Sweeping of the site to remove dust or mud.

PR11. Dealing with pests

The nature of the waste and the inspection procedures in place will limit the possibility of animal by-products and food waste that attract pests being received at the site.

The following measures will be taken to minimise the risk of pests:

- Waste inspected before acceptance to identify potential contaminants.
- Quarantine non-conforming putrescible wastes and removal off-site within 72 hours.
- Visual monitoring for pests/vermin performed daily including inspections for evidence of droppings, damage to property/plant or ground disturbance e.g. burrow, nests and excessive infestation present; and
- Good housekeeping and regular inspection of mess facilities.

In the event of a pest infestation being detected the following measures will be implemented:

- Suitable treatment will be implemented either by employees or by suitable contractors, this may involve the application of insecticides or the setting of traps and poisons, or other measures as appropriate.
- Any waste identified as attracting scavengers shall be isolated and removed from site.

PMR Ltd

PR12. Dealing with odour problems

The nature of the waste and the inspection procedures in place will limit the possibility of odorous wastes being received at the site.

The following measures will be taken to minimise the risk of odour:

- Waste inspected before accepting to identify potential contaminants.
- Quarantine odorous wastes and removal off-site within 72 hours.
- Sniff monitoring for odour performed daily
- Good housekeeping and regular inspection of mess facilities.

In the event of an odour problem the following measures will be implemented:

- Suitable treatment will be implemented either by employees or by suitable contractors.
- Any waste identified as generating the odour shall be isolated and removed from site.

PR13. Undertaking a fire drill

A fire drill is intended to ensure, by means of training and rehearsal, that in the event of fire:

- The people who may be in danger act in a calm and orderly manner. Where necessary those designated carry out their allocated duties to ensure the safety of all concerned.
- The means of escape are used in accordance with a pre-determined and practised plan.
- If evacuation of the building becomes necessary, staff should be aware of what to do.

Where there are alternative means of escape the drill should be based on the assumption that one or more of the escape routes cannot be used because of a fire. During these drills a member of staff who is told of the supposed outbreak should operate the fire alarm and, thereafter, the fire routine should be rehearsed as circumstances allow. This may raise some difficulties where members of the public are present, but such a procedure is still desirable.

It should also be remembered that regular fire drills test the procedures and training that you have put in place for the safe and effective evacuation of disabled and infirm employees and visitors. British Standard 5588 Part 8 Code of Practice for means of escape for disabled people gives guidance on this matter. . In cases where there are profoundly deaf people employed, then an alternative alarm may need to be in place. Technical advice on such alarms can be obtained from the Royal National Institute for the Deaf, 105 Gower Street, London WC1E 6AH.

Conducting a Fire drill

Normally advance warning should not be given of the fire drill. However, you can individually warn anyone who may need to know in advance. Every opportunity should be taken to learn lessons from the drill and to reinforce staff training where gaps are identified. It is good practice to appoint a small number of people, usually safety representatives or managers to observe the drills and highlight areas of concern. It is important that all managers are aware of the procedures, as employees will naturally look towards them in an emergency.

No.	Check List	Yes/No/NA	Comments
1	Agree the scenario, extent and aim of the exercise with senior management.		
2	Assemble a multi-disciplinary exercise planning team and agree the objectives for each area to be exercised.		
3	Sketch out and then develop the main events of the exercise and associated timetables.		
4	Determine and confirm the availability of the outside agencies to be involved, such as the media or voluntary agencies.		
5	List the facilities required for the exercise and confirm theiravailability e.g. transport, buildings and equipment.		
6	Ensure that all communications to be used during the exercise havebeen tested at some stage prior to the exercise.		
7	Check that Umpires for each stage of the exercise are clearly identified and properly briefed.		
8	Ensure that directing staff are clearly identified and properly briefed and have good independent communications with "exercise control" throughout the exercise.		
9	If the exercise links a number of activities or functions which are dependent on each other, confirm that each has been individuallytested beforehand.		
10	Ensure that all participants have been briefed.		
11	Ensure that all players are aware of the procedures to be followedif a real emergency occurs during the exercise.		
12	If spectators are to be invited, including the media, ensure that theyare clearly identified and properly marshalled, and arrange for themto be kept informed of the progress of the exercise. Ensure their safety.		
13	For the longer exercise, arrange catering and toilet facilities.		
14	Ensure that where appropriate outside agencies are indemnified inthe event of exercise accident.		
15	Warn the local media, emergency services switchboards / controls and any neighbours who might be worried or affected by the exercise. Position Exercise in Progress signs if appropriate.		
16	Ensure that senior management, directing staff, Umpires and key players are aware of the time and location for the "hot" debrief and circulate a timetable for a full debrief.		
17	Agree and prepare a detailed set of recommendations, each one accompanied by an action addressee and timescale.		
18	Prepare a clear and concise summary report of the exercise to distribute to all organisations and groups which took part, togetherwith major recommendations.		
19	Discuss with senior management the outcome of the exercise andagree the future exercise programme.		
20	Thank all personnel and outside agencies which took part.		

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PR14. Dealing with mud on roads

The site and access tracks are laid to concrete, tarmacadam and hardstanding and is located on an industrial estate served by a tarmacadam road. This results in limited opportunity for mud generation.

If mud on site roads is a significant problem mechanical sweeping will be undertaken.

PMR Ltd

PR15. Accident and Injury

Vehicle Accident

In the event of an accident involving any item of plant or vehicle, the person first becoming aware of the incident must immediately check for casualties.

Any spillage will be dealt with as in PR6. Immediate action will include -

Vehicle Damage

1. Check for casualties.
2. If there are any casualties the First Aider must be summoned and the emergency services called.
3. Check for immediate danger and give first aid (if trained and safe to do so)
4. The plant item or vehicle must not be moved, unless to remove casualties, until the Site Manager has assessed the situation and obtained any evidence as to the cause.

The accident details should be noted in the site log. The Site Manger will carry out an investigation filling in the appropriate forms and initiate any corrective action. A report will be made to the Manager.

All accidents and near misses must be reported no matter how trivial as per the Accident/ Incident and Emergency Procedure

Notifiable Personnel Injury

If any person at the site suffers a serious personal injury the First Aider or Senior person on site will telephone the emergency services if necessary and arrange for the casualties to be dealt with as appropriate. The Accident book will be filled in and kept up to date with any subsequent information about the casualty.

Accident/ Injury

1. Remove casualties from immediate danger
2. If injuries are serious Dial 999 and ask for an ambulance - follow the instructions given
3. Summon the first aider
4. Do not move any plant or equipment involved other than to rescue casualties
5. Inform your supervisor/ line Manager immediately
6. Contact the Manager
7. Record details in accident book

Electrical Incidents

1. Isolate supply and/ or casualty,
2. **Do not touch anything until supply is isolated.**
3. Summon Help / Call emergency services (dial 999)
4. Give first aid if it is safe to do so.
5. Inform your supervisor/ line Manager immediately

The Site Manager will inform senior Management of any such accident and produce a brief report as per Accident/ Incident and Emergency Procedure. The Manager will advise on appropriate action.

PMR Ltd

PR16 Managing Gas Cylinders

Gas cylinders (whether full or empty) must be stored in a secure, well ventilated caged area, sited away from drains and sumps which can hold and accumulate heavier-than- air gases. Any cylinders found in such areas must be removed immediately and stored in line with this document.

- The storage area must be clearly signed and kept locked when not in use. Empty bottles kept separate from full ones).
- Ensure that no ignition sources are permitted in or around storage areas and that 'NO SMOKING' and 'No NAKED FLAMES' signs are prominently displayed.
- Ensure that there are no combustible or hazardous materials near to the storage area, such as batteries, waste oils and waste paints.
- ONLY trained authorised personnel should handle cylinders & enter a storage area.
- Ensure that clear instructions for safe storage and collection are posted on the storage area and that all site staff are aware of and understand them.
- Ensure that an appropriate fire extinguisher is stored nearby, but not kept inside the storage area.

Cylinder Storage

The Storage of Gas Cylinders should comply with Section 5.1 of the British Compressed Gas Association advisory document 'BCGA GN2':

1. Oxidant cylinders MUST be stored 3m away from flammable gases or separated by a fire-resistant partition (minimum 30 minutes).
2. LPG (50-1000kg) to be stored 3m from any other gas cylinder types.
3. Toxic cylinders to be stored 3m from LPG & 1m from other flammables.
4. Pyrophorics to be stored 2m from most gas types & 3m from LPG.

All cylinders must be stored in an upright position. Taller cylinders (i.e. those with a high centre of gravity) must be individually secured at all times.

Ensure that the contents of the cylinders are identified and logged so far as possible. Where it is not possible to identify the contents, the cylinder must be labelled as 'Contents Unknown'.

Cylinder Handling

Only trained authorised personnel should handle cylinders. Employees must be trained in the appropriate Manual Handling techniques for handling cylinders. Ensure that all persons wear the correct PPE (comprising eye protection & safety footwear) whenever handling or using gas cylinders. Employees must be instructed and monitored to ensure that they:

- NEVER try to open a gas cylinder to discharge the contents.
- ALWAYS ensure that the valve is closed before attempting to handle a gas cylinder.
- NEVER roll cylinders along the ground. This can damage the cylinder or the valve
- NEVER throw or drop the cylinders

The quantities of gas cylinders stored on site should be kept as low as possible within the limits of the safe storage facilities provided.

Any cylinders found in the waste stream must be removed immediately and stored in an appropriate facility for the type of gas in the cylinder, well away from fire exits and operational areas.

Never smoke or use naked flames in or near to cylinders. Obey all safety signs and instructions.

Always follow the correct Manual Handling technique when handling cylinders. If you are unsure, ask your manager.

Disposal

The cylinders should be removed for disposal on a regular basis by an approved contractor/ supplier.

Emergency Procedures

Ensure that emergency procedures are in place and activated in the event of an emergency situation occurring, such as a fire or a substantial gas leak.

Employees must inform the supervisor or manager immediately in the event of an emergency situation, so that they may contact the emergency services.

Inform all other site users, and those people in surrounding buildings to evacuate immediately in the event of an emergency. (and go to the assembly point).

All empty or redundant Fire Extinguishers should be identified and replaced as soon as possible.

PEMBROKESHIRE METAL RECYCLING BESPOKE PERMIT

ENVIRONMENTAL MANAGEMENT SYSTEM

Appendix 3
Forms

Report Number 2135r3v1d0621

PMR Limited

FORM TITLE	**Record Of Waste Deliveries**
Version	
Date	**June 2021**
Owner	

Link to Procedures:

Procedure Ref:	Procedure description

Date/ Time	Ticket No:	Site Address of Waste	Name of Supplier/ Carrier	Waste Carrier Registration Number	Delivery Vehicle Registration Number	Waste Type	Waste EWC Code	Quantity in load tonnes/ No. ELV	Waste Acceptable		Reasons for Waste Rejection
									Y	N	

PMR Limited

FORM TITLE	**Recording Non-Compliant Wastes**
Version	
Date	**June 2021**
Owner	

Link to Procedures

Procedure Ref:	Procedure description

Date and Time:	Reason for non-compliance e.g. odour, visual contamination, too wet etc.
Waste Description:	Action Taken:
Name and Address of Waste Producer	Waste Carrier Details, Vehicle Type and Vehicle Registration
Waste Transfer Note Number	Final Waste Destination
NRW Contacted?	

PMR Limited

FORM TITLE	**Preventative Maintenance Programme**
Version	
Date	**June 2021**
Owner	

Preventative maintenance is regularly performed to reduce the likelihood of the item failing or requiring unplanned replacement or maintenance. Preventative maintenance is performed while the equipment is still working, so that it does not break down unexpectedly.

The maintenances schedule below outlines the frequency that key parts of the site and items of plant and equipment are to be checked and maintained. Each item will be provided with a bespoke detailed checklist in accordance with the manufacturer's instructions, where relevant. At all times however consideration should be given to**: level of wear and tear, the need for lubrication, signs of overheating and performance of silencers.**

IF ANY DEFECTS ARE NOTED THAT POSE A RISK TO HUMAN HEALTH OR THE ENVIRONMENT SENIOR MANAGEMENT SHOULD BE INFORMED IMMEDIATELY

Item of Plant/ Part of site	Detailed Checklist Reference	Daily	Weekly	Monthly	Quarterly	Six monthly	Annually

Item of Plant/ Part of site	Detailed Checklist Reference	Daily	Weekly	Monthly	Quarterly	Six monthly	Annually

Item / part of site:		**Frequency of checks:**
Completed on	**Completed by**	**Comments e.g. work completed, repairs required,**

PMR Limited

FORM TITLE	**Training Record**
Version	
Date	**June 2021**
Owner	

Name	**Date employment commenced**
	Job Title

Induction Training

Course Title	Authorisation by Line manager	Date of Authorisation	Date training Completed	Initialled by trainer

Qualifications gained in this employment and Expiry Date

Training requirements

PMR Limited

FORM TITLE	**Training Matrix**
Version	
Date	**May 2021**
Owner	

Link to Procedures:

Procedure Ref:	**Procedure description**
Training	Planning training needs

PERSONNEL NAME	TRAINING REQUIRED (tick boxes to show who needs which training)																			COMMENTS
	Environmental awareness							Maintenance/operations						Accidents and emergency						
	Certificate of Technical Competence	**Regulatory requirements**	**Reporting procedures to inform supervisors of deviation from Permit**	**Waste receipt inc Duty of Care**	**Waste separation and storage**	**Awareness of local environment**	**Awareness of potential environmental impacts from operations**							**Fire procedure**	**Spill response procedure**	**Flood procedure**	**Failure of services**			

PMR Limited

FORM TITLE	**Fire Drills**
Version	
Date	**June 2021**
Owner	

A drill is intended to ensure, by means of training and rehearsal, that in the event of fire:

The people who may be in danger act in a calm and orderly manner. The appointed personnel undertake their key tasks.

The means of escape are used in accordance with a pre-determined and practised plan. If evacuation becomes necessary, staff should be aware of what to do.

Normal, advance warning should **not** be given of the fire drill.

Every opportunity should be taken to learn lessons from the drill and to reinforce staff training where gaps are identified.

It is good practise to appoint a small number of people to observe the drills and highlight areas of concern. It is important that all managers are aware of the procedures, as employees will look towards them in an emergency.

FIRE EVACUATION LOG SHEET

Date:	**Reason for Evacuation:**
Time of Alarm:	
Time Taken To Evacuate:	
Time Taken To Conduct Roll Call:	
Anyone unaccounted for:	
Were any escape routes blocked?	
If yes, with what?	
Was all machinery switched off?	
If not, why?	
Fire alarm reset?	
Feedback from employees?	

Fire evacuation drills should be carried out at least once in every period of 6 months, unless otherwise specified.

PMR Limited

FORM TITLE	**Site Inspection Form**
Version	
Date	**June 2021**
Owner	

Use this form or Site Diary at any time to record the performance of the site. Completion of this form on a regular basis will assist with early identification of aspects requiring improvement and potentially prevent incidents occurring. Taking photographs on a regular basis will also help assess site conditions.

IF ANY ASPECT IS OF THE SITE OPERATION IS FOUND TO BE POSING A RISK TO HUMAN HEALTH OR THE ENVIRONMENT THEN A MANAGEMENT REPRESENTATIVE SHOULD BE INFORMED IMMEDIATELY

Date:	**Inspected By:**	**Outdoor Weather:**
What activities are occurring during the inspection? e.g. processing/not processing, waste being delivered etc.		
Observations and actions required should be recorded below. If there are no issues of concern 'OK' can be used. **Before completing this form please review the previous inspection record to check if any actions should have**		
Area of Site Inspected	**ISSUES OF CONCERN:** Important factors to consider during the visual inspection of any part of the site should include: **security, vandalism or damage, odours, leaks, presence of nuisance dust and noise, presence of pests such as vermin/birds/insects, litter, fire hazards, integrity of drainage systems, safety of traffic movements and maintenance requirements.**	
Site Exterior including roof structure and surface water drainage		
Access and Exit Points		
Waste Receipt Area		
Sealed drainage system		
Fire Fighting Equipment		
Actions Required or Additional Notes:		

PMR Limited

FORM TITLE	**Accident and Incident Record**
Version	
Date	**May 2021**
Owner	

Link to Procedures

Procedure Ref:	Procedure description

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify NRW on 0300 065 3000 ASAP. Have you done so?	Yes/No/not applicable Time: Date: E.A Incident number:
Please print your name and sign	

PMR Limited

FORM TITLE	**Recording Complaints**
Version	
Date	**June 2021**
Owner	

Information to be recorded:

Name and Address:		**Tel:** **Fax:** **E-Mail:** **Mobile:**	
Date Complaint Received	**Written or Verbal**	**Date Complaint Rectified**	**Written or Verbal**
Nature of Complaint			
Remedial Action			
All Complaints Should Be Discussed At The Next Management Review Meeting			
Review Meeting Date	**Complaint Discussed**	**Action Agreed**	**Signed (Meeting Rep.)**
Comments			

PMR Limited

FORM TITLE	**Customer Complaint Log**
Version	
Date	**June 2021**
Owner	

Complaint No.	Name and Nature of Complaint	Date of Complaint	Date Rectified	Signed Off By

PMR Limited

FORM TITLE	**Non-Conformance Corrective Action Report**
Version	
Date	**June 2021**
Owner	

Non Conformance No:	Raised by:	Position:	Date:
Details :			
Agreed **corrective/preventive action** Completed by		Date	
Management comments Signed		Date	

All Non-conformances Should Be Discussed At The Next Management Review Meeting

Review Meeting Date	Non Conformance discussed	Action Agreed	Signed (Meeting Rep.)
Comments			

PMR Limited

FORM TITLE	**Preventative Action**
Version	
Date	**June 2021**
Owner	

N/C Number	Date	Raised by	Area of Non-Conformance	Route Cause	Preventative Action	Improvement Outcome	Management Review Meeting

PMR Limited

FORM TITLE	**Audit Programme**
Version	
Date	**June 2021**
Owner	

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Procedure to be Audited

PMR Limited

FORM TITLE	**Audit Report**
Version	
Date	**June 2021**
Owner	

Procedure Audited : ..... Title.....			
Audit Report No.....	Conducted By.....		Date.....
Audit Summary : Procedure ..... has been audited and its application reviewed. The applied procedure **IS/IS NOT** complied with (see separate non-conformance reports)			
Audit Report : a) Is current revision in use? b) Is it a controlled copy? c) Is it easily accessible? d) Is it correctly applied? e) Does it need changing?	Y	N	Remarks ....
Examples of Documents and Records reviewed and comments on use :			
Reviewed By : ..... (Management Representative) Date : ..... Comments :			

PEMBROKESHIRE METAL RECYCLING BESPOKE PERMIT

ENVIRONMENTAL MANAGEMENT SYSTEM

Appendix 4
WAMITAB Certificates

Report Number 2135r3v1d0621

wamitab

Qualification Title:

WAMITAB Level 4 High Risk Operator Competence for Managing Physical and Chemical Treatment of Hazardous Waste

Qualification Accreditation Number:

601/8502/8

This Certificate is awarded to

Gareth Danter-Hill

Awarded: 20/02/2018

Serial No:29574/HROC6/1

Authorised

Chris James
Chief Executive Officer, WAMITAB

Regulated by Ofqual

For more information see http://register.ofqual.gov.uk

Corff dyfarnu cydnabyddedig
CYMWYSTERAU CYMRU QUALIFICATIONS WALES
Recognised awarding body

The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland.

00116599

Certificate No. OCC8473

Operator Competence Certificate

Title:

Physical and Chemical Treatment of Hazardous Waste

This Certificate is awarded to

Gareth Danter-Hill

Awarded: 20/02/2018

Authorised

WAMITAB Chief Executive Officer

CIWM Chief Executive Officer

The Chartered Institution of Wastes Management

This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator Competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.

00116556

wamitab

Certificate No: 14453

CERTIFICATE OF TECHNICAL COMPETENCE

This Certificate confirms that

Gareth Danter-Hill

Has demonstrated the standard of technical competence required for the management of a facility of the type set out below

Facility Type

Level 4 in Waste Management Operations -

Managing Treatment Hazardous Waste (4TMH)

Authorising Signatures:

Chief Executive Officer

Director:

Date of issue: 20 February 2018

00021638

Credit certificate

This certificate determines credit awarded to:

Gareth Danter-Hill

Units gained:

		Credit Value	Credit Level
A/508/0756	Maintain health and safety in the waste resource management industry	4	4
F/508/0757	Manage the environmental impact of work activities	3	4
F/508/0760	Manage the movement, sorting and storage of waste	5	4
R/508/0861	Control work activities on a waste management facility	6	4
K/508/0882	Identify and implement improvements to waste management operations	3	4
M/508/0883	Control maintenance and other engineering operations	5	4
T/508/0884	Procedural Compliance	4	4
A/508/0885	Manage and maintain systems for responding to emergencies	3	4
F/508/0886	Manage the reception of hazardous waste	7	4
M/508/0978	Manage transfer and disposal from hazardous waste treatment and recovery operations	9	4
H/508/0993	Manage site operations for the treatment of hazardous waste	9	4
Y/508/0974	Manage an inspection visit at your site from regulatory bodies	6	4

Awarded: 20/02/2018

Serial No.: 29574/OCS01/1

Authorised

Chris James
Chief Executive Officer, WAMITAB

Regulated by Ofqual

For more information see http://register.ofqual.gov.uk

Corff dyfarnu cydnabyddedig
CYMWYSTERAU CYMRU QUALIFICATIONS WALES
Recognised awarding body

The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland.

00116593

Continuing Competence Certificate

This certificate confirms that

Gareth Danter-Hill

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 20/12/2019

TSH	Transfer - Hazardous Waste
TMH	Treatment - Hazardous Waste

Expiry Date: 20/12/2021

Verification date: 19/12/2019

Authorised:

WAMITAB Chief Executive Officer

Learner ID: 29574

Certificate No.: 5157396

Date of Issue: 20/12/2019

CIWM Chief Executive Officer

The Chartered Institution of Wastes Management

00134642

Geotechnical &
Environmental Services

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