Management System Summary

TeleCycle Europe Ltd

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Helping clients prosper through compliance

SITE DETAILS

TeleCycle Europe Ltd

Unit 15 Drome Rd

Deeside Industrial Park,

Sealand Garden City

Flintshire

CH5 2NY

OPERATOR DETAILS

TeleCycle Europe Ltd

450 Brook Drive,

Green Park,

Reading,

Berkshire,

RG2 6UU

APPLICATION REFERENCE

PAN-020500

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ACTION	DATE	NAME
Prepared	24/05/2023	Elliott Howard
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K419.1~20~001	Permit Boundary Plan
K419.1~20~002	Sensitive Receptors Plan (1km)
K419.1~20~003	Site Setting Plan (2km)
K419.1~20~004	Site Layout Plan

APPENDICES

APPENDIX	REFERENCE	TITLE
Appendix A	K419.1~09~006	Sensitive Receptors Table
Appendix B	TCE_ISO 14001-2015 Cert 04.02.2022	ISO14001 certificate
Appendix C	TCE_BMRA_Membership	BMRA membership certificate

1 INTRODUCTION

This document is the Management System Summary (MSS), as required by application form Part B2, Section 3d *Management Systems (all)* and the associated guidance[1]. The MSS accompanies the application for Bespoke Environmental Permit (Ref: PPN-00750) to be submitted to Natural Resources Wales (NRW) for the:

- Physical treatment (including temporary storage) of <10 tonnes/day hazardous, and non-hazardous waste, consisting of:
    - Sorting, separation and shearing of catalytic converters (CATs) into different components.
    - Sorting, separation, manual dismantling, and storage of category 3 and 4 WEEE into different components for onward transport.
    - Sorting, separation and storage of pre-segregated printed circuit boards.
- All activities support the onward transport and recovery.

The ceramic monolith separated from the CATs and the printed circuit boards (PCBs) separated from the WEEE are exported to metals refiners for recovery of precious metals.

The rest of the components (ferrous metals, non-ferrous metals, RCF matting, plastics and packaging) are collected by registered waste carriers and transported to appropriately permitted facilities.

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

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

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

[1] Develop a management system: environmental permits - GOV.UK (www.gov.uk)

2 SCOPE OF MANAGEMENT SYSTEM

TeleCycle Europe Ltd collects catalytic converters, printed circuit boards, and WEEE from supply chains within the UK with the main aim of sending components of the waste overseas for recovery of precious metals.

Telecycle Europe operates under a certified ISO14001 Management System (see certificate in Appendix B) which covers operations associated with the trading and brokering, collection, transport, storage, treatment and recovery of precious metal-bearing materials and waste as well as continuous development.

They are also members of the British Metals Recycling Association (BMRA, see APPENDIX C for certificate).

The scope of this Management System Summary (MSS) extends to all operations associated with the acceptance, handling, treatment and storage of waste at the Deeside site. The wastes permitted to be accepted at the facility are detailed within Section 6.1.

The site is operated in accordance with management procedures and controls outlined within this MSS which has been produced in accordance with the Environmental management – guidance '*Develop a Management System: environmental permits'* (updated 31st August 2022)[2].

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

A controlled copy of the MSS will be available at Unit 15 Drome Rd, Deeside Industrial Park, Sealand Garden City, Flintshire, CH5 2NY.

Telecycle Europe Ltd will ensure that copies of all relevant permits and approved supporting documents are provided to all people given responsibility for the management or control of the site.

The locations of the documents will be made known to all relevant personnel and will always be readily available for inspection by regulatory bodies when the site is operational.

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

[2] Develop a management system: environmental permits - GOV.UK (www.gov.uk)

TABLE 1. Key Contact on Site

Jeremy Pudge	Tel: +44 (0) 74962 51080	e-mail: jpudge@telecycle.com

3 SITE INFRASTRUCTURE

The site of the permitted activity is within an industrial unit, that is approximately 0.07 ha.

Site infrastructure comprises of the following:

- Front yard area used for staff parking and vehicle movements, underlain by impermeable surface, with a drainage channel for rainwater discharge
- 8 yard skip for ferrous metal
- Indoor industrial unit underlain by impermeable surface
- Entrance gate
- Scales and QC area (for waste acceptance)
- Incoming waste storge, sorting and preparation area
- Catalytic converters shearing area, fully enclosed with LEV extraction system
- WEEE manual dismantling area
- Outgoing waste storage areas
- CCTV cameras, smoke detection, spill kits, fire extinguishers and first aid kits
- Office and amenities

4 PERMITTED ACTIVITIES

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

Catalytic converters and WEEE are separated into different components for the purpose of recycling:

- The catalytic converters are subject to hydraulic shearing to open up the metal casing and extract the ceramic monolith (containing the precious metal catalyst) and the metal or RCF matting which provides thermal insulation and physical support to the ceramic monolith. The equipment is connected to a filtered LEV system to extract and collect any dust/fibres released.
- The WEEE components are separated by manual dismantling to separate the printed circuit boards (PCBs) from the metallic or plastic casings and the packaging.
- Printed Circuit Boards (PCBs) may also be received already separated and pre-segregated by the waste producer.

The separated components are temporarily stored pending collection for recycling/recovery or disposal operations.

Permitted activities codes are:

- R3: Recycling/reclamation of organic substances which are not used as solvents
- R4: Recycling/reclamation of metals and metal compounds;
- R5: Recycling/reclamation of other inorganic materials
- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced); and

5 ANNUAL WASTE QUANTITIES

The site has a total annual throughput of up to 2,499 tonnes of waste, and a maximum hazardous waste treatment capacity of 10 tonne in a day.

The annual tonnage of the WEEE manual dismantling is unlikely to exceed 100 tonnes. The manual dismantling of WEEE on site is a simple operation to complement the export of PCBs, operating on an *ad-hoc* basis.

6 RECEPTION, HANDLING AND STORAGE OF WASTE

The following section describes the operational techniques that are implemented on site to control the release of any potentially polluting substances to the environment during reception, handling and storage of the waste.

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

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

6.1 Pre-acceptance procedure

Telecycle accepts hazardous and non-hazardous wastes from within the UK at their site, consisting of waste catalytic converters (both with and without RCF matting), and category 3 WEEE (IT and telecommunication equipment) and some category 4 WEEE (consumer equipment). The types of wastes to be accepted at the site are listed in Table *2* below.

Table 2. List of Waste

CODE	DESCRIPTION
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 21*	hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14 (catalytic converters containing refractory ceramic fibre (RCF) matting only).
16 01 22	components not otherwise specified (catalytic converters only)
16 02	**Wastes from electrical and electronic equipment**
16 02 13*	WEEE containing hazardous substances or components other than polychlorinated biphenyls, CFC, HCFC or HFC, or free asbestos (category 3&4: IT and telecommunication and consumer equipment).
16 02 14	WEEE not containing hazardous substances or components (category 3&4: IT and telecommunication and consumer equipment).
16 02 15*	Hazardous components removed from discarded equipment (printed circuit boards)
16 02 16	Non-hazardous components removed from discarded equipment
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 01	**separately collected fractions (except 15 01)**

CODE	DESCRIPTION
20 01 35*	WEEE containing hazardous components other than fluorescent tubes and other mercury containing waste or CFCs (category 3&4: IT and telecommunication and consumer equipment)
20 01 36	WEEE not containing hazardous substances or components

A pre-acceptance procedure is followed in accordance with S5.06 section 2.1.1.

When a new enquiry is received by Telecycle the waste producer is asked to confirm the type of process where the waste is produced, the expected quantity of waste, and hazards associated with the waste (e.g. HP07 for RCF matting). The enquiry information is allocated a unique reference code and retained as a record for a minimum of 3 years.

Waste is delivered and stored pending treatment (shearing and manual dismantling) in either intermediate bulk bags, metal cages, IBCs, drums, or barrels. These are usually supplied by the Operator.

6.2 Operating hours

The site will be operational between 08:00 and 17:00, Monday to Friday

6.3 Reception

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

The containers are visually inspected to confirm the type and quantity of waste is correct to that agreed and specified by the waste producer, and to remove any contaminants, prior to acceptance at the site. All loads are inspected for non-permitted wastes, quality, and conformance with the Environmental Permit requirements. Non-conforming loads are refused entry and details are recorded.

The Waste Transfer/Consignment Note is then completed by Telecycle, dependent on the nature of the waste, stating the date and time of the delivery of the container, details of the delivery vehicle, a description of the waste by type and quantity, EWC, SIC and all other 'duty of care' requirements.

All drivers must be wearing appropriate PPE, before beginning the unloading process. Waste loads will be unloaded using a forklift truck or pallet truck, operated by a suitably qualified person. Smaller packaged items may be unloaded manually.

6.4 Handling & Storage

A final visual inspection of the waste is then undertaken, where single category loads (e.g. those under 16 01 22 non-hazardous catalytic convertors) have been received these are unloaded, weighed on suitably calibrated scales and stored within a suitable container in the designated storage area (see Site Layout Plan K419.1~20~004) within the enclosed building.

Where mixed loads are received (under 16 01 21*), the catalytic converters with and without RCF matting are visually identified by looking down the pipe and segregated by hand sorting (where this is not possible, the segregation occurs following the de-canning process). These are then weighed, issued a unique reference and stored within a suitable container in the designated storage area (see Site Layout Plan K419.1~20~004) within the enclosed building.

Catalytic convertors are processed and stored as batches, passing through the hydraulic shearing process to access the ceramic monolith and separate from the other components. Containers of catalytic convertors may be temporarily stored within the *Storage, Sorting & Prep Area* as they move through the process. Separated components from the shearing process are then stored in their designated storage areas (Site Layout Plan, K419.1~20~004).

RCF matting will be immediately bagged into a robust, cable tied bag and placed within a sealed drum awaiting collection and stored within the indicated area shown on the site layout plan (K419.1~20~004).

Printed Circuit Boards arrive to site pre-segregated so once a final visual inspection has been conducted and the load has been weighed and stored in a suitable container, they are stored within the designated storage area (see Site Layout Plan, K419.1~20~004).

WEEE wastes accepted onto site are done so in low volumes and temporarily stored within the scales and QC area while they await manual dismantling. They are processed immediately, with treated WEEE fractions and PCBs from the dismantling stored in the designated areas highlighted on the Site Layout Plan (K419.1~20~004).

Any non-conforming waste types (other than those listed in Section 09) will be rejected upon visual identification. Rejected wastes will be relocated to the designated quarantine area

(shown in Site Layout Plan K419.1~20~004), the customer will be informed (usually via telephone/email) and arrangements will be made to remove these items from site within 72 hours.

All hazardous and non-hazardous waste types are stored in suitable containers in the designated storage areas (shown in Site Layout Plan K419.1~20~004) within the enclosed building. Uncontaminated ferrous metals will be stored within the enclosed, locked 8 yrd skip outside the warehouse.. All containers are labelled appropriately with a unique reference, date and hazard classification (HP07 for RCF matting), if appropriate.

A record is kept of all waste received at, or rejected from, the site. These records contain:

- Date of arrival
- Producers' details
- Previous holders
- A unique reference number
- Container type and size
- Intended treatment/disposal route
- Accurate nature and quantity of waste, including hazards
- Storage location

All records are maintained for a minimum of 3 years following recovery or disposal.

Waste reception and storage is undertaken within an enclosed building. There are no internal drains within the building and as such, any spillages will initially sit on the impermeable surface prior to being cleaned up and disposed of at suitably permitted facilities. Spill kits are strategically placed within the building.

Daily site checks are undertaken to ensure that all structures are in good repair and recorded in the site diary or similar document. A comprehensive inspection of the site floor is undertaken monthly, repairs are organised where defects are found to maintain the integrity of the surface and prevent the transmission of fluids.

Hydraulic and lubricating oils, for use within mobile plant and machinery, will be stored in appropriate containers or removed by the service engineer. The container is provided with a spillage containment tray, to prevent the leakage from the container of any materials that might leak from any of the drums contained within it.

All drums and containers stored within the site will be clearly marked with their contents and capacity. Drum openings will be securely sealed before being moved to or from the site to prevent spillages.

Gas cylinders are stored externally within a locked cage and surrounded by two external walls. The cage is located away from other combustion risks, secured and locked at all times and appropriately signposted. Given the locality of the supplier, only the minimum required cylinders are stored on site at any one time.

Spill response kits shall be available during the transfer of all substances at the site.

The external drainage gullies are inspected on a monthly basis to ensure they are free flowing, and the integrity has not been breached. If found to be blocked immediate action will be taken to remove and dispose of the blockage.

6.5 Waste dispatch

Following treatment (described in Section 7) waste containers leaving the site will be accompanied by a written description, and due diligence checks will ensure that they are transferred to a suitably permitted waste management facility by a registered waste carrier.

7 TREATMENT PROCESS

All site treatment processes are undertaken in accordance with S5.06 and are described in detail below and with the flow diagram presented in Figure 2.

7.1 Shearing of Catalytic Converters

The catalytic converters are received already separated from the rest of the exhaust system. Catalytic converters are subject to a hydraulic shearing process to open up the metal casing and extract the ceramic monolith (containing the precious metal catalyst) and the metal or RCF matting which provides thermal insulation and physical support to the ceramic monolith. The equipment is connected to a filtered LEV system to extract and collect any dust/fibres released.

Throughout the hydraulic shearing process, the metal casings, ceramic monolith and RCF matting are retained within the enclosed system with LEV extraction, with direct connection to sealed containers where the components are dropped without the need for any transfer between containers.

Metal casings, ceramic monolith and RCF matting are segregated and stored in appropriate containers in designated areas on the concrete floor within the enclosed building. Only clean, uncontaminated ferrous metal may be stored outside in a enclosed, locked 8 yrd skip prior to onward transfer off site.

7.2 Removal of Refractory Ceramic Fibre (RCF) matting

RCF is classified as a Category 1B carcinogen and has properties akin to asbestos, this is the primary reason why mixed or unsorted catalytic converters are now classed as hazardous waste.

The RCF matting is removed by hand during the shearing process and stored in a robust, airtight bag placed within a labelled, suitable container in a designated area (see Site Layout Plan K419.1~20~004), prior to disposal to a suitably licensed landfill. All employees potentially exposed to this material are suitably trained and wear the required PPE and/or operate under a LEV system fitted with a filter.

7.3 Manual dismantling of WEEE

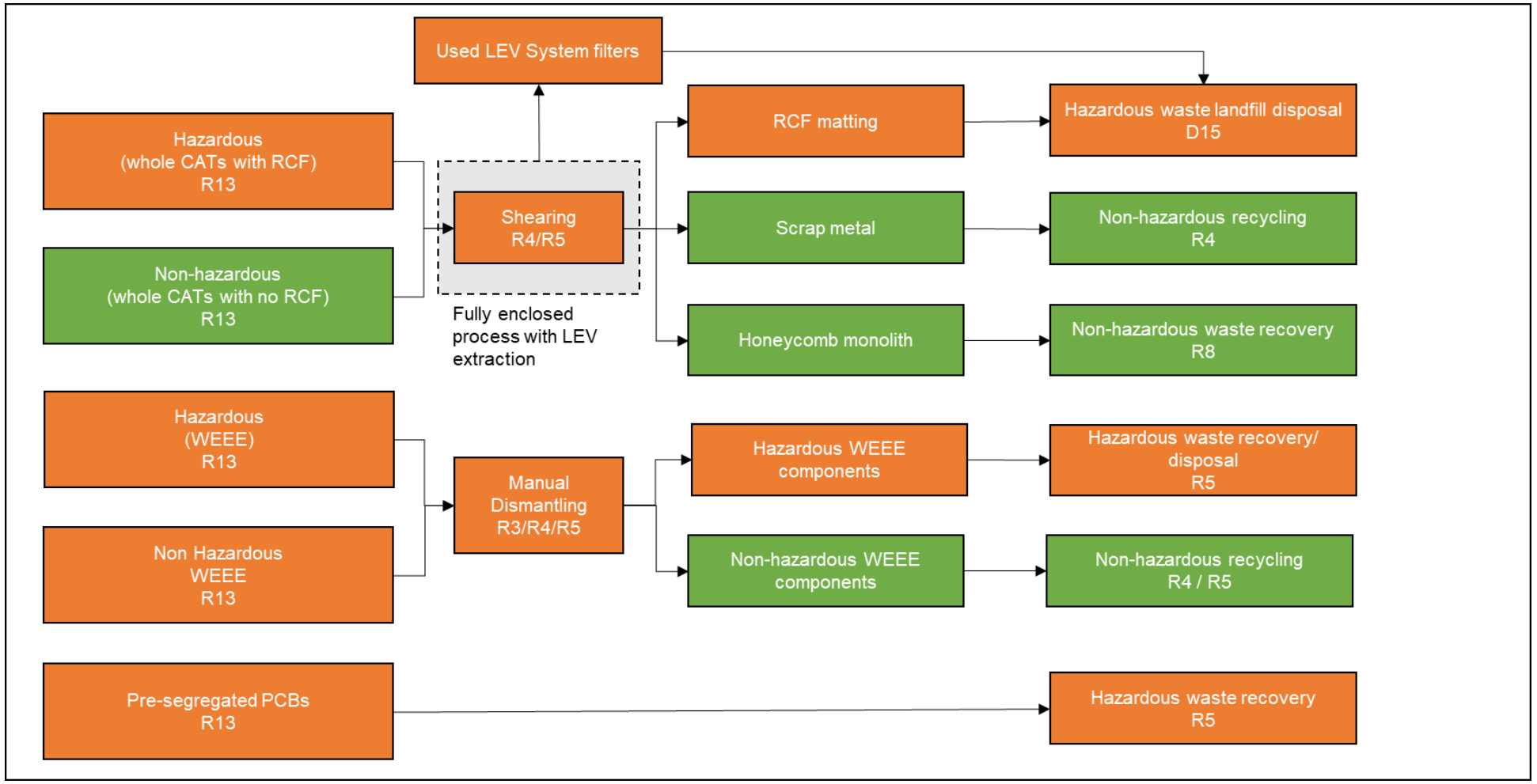
The manual dismantling of WEEE on site is a simple operation to complement the export of PCB’s, operating on a low scale, and ad-hoc basis. Typical materials for dismantling include:

- Servers, PC's, laptops
- Set top boxes, routers, hubs
- Mobile and fixed telecoms infrastructure

The annual tonnage of the manual dismantling is unlikely to exceed 100 tonnes, to be conducted on two workbenches with separated materials divided into storage bins. All dismantling will be done with hand tools or battery-charged drivers. The WEEE dismantling area is shown in **Figure *1***, which shows the small scale of the operation.

Figure 1. Pictures of the WEEE dismantling area

Figure 2. Process Flow diagram



8 SITE AND EQUIPMENT MAINTENANCE

The principal equipment for site operations are the CATs shear and LEV system.

The shear is maintained according to the Manufacturer's routine and periodic maintenance schedule which includes daily operator inspections and weekly, three-monthly and twenty-four month periodic routine maintenance.

The shear equipment is connected to a filtered LEV system to extract and collect any dust/fibres released. The LEV system is designed so that the ceramic honeycomb monolith as well as any dust and fibre liberated, drop directly into the sealed containers used for final storage prior to dispatch.

Similarly, the extracted dust/fibres is directly collected by the sealed container used for storage of the dust/fibres prior to disposal.

The fully enclosed shear and LEV system guarantees that there is no emission from the processing of the waste CATs.

The dismantling of WEEE is carried out manually, which also ensures no emissions form the WEEE dismantling process.

All other equipment and mobile plants, such as scale and forklift trucks are maintained, and records kept, as a minimum, in accordance with the manufacturer's instructions.

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

8.1 Site Operational Procedures

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

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

8.2 Training

It is the responsibility of Senior Management and the Technical Competent Manager to ensure that no unauthorised persons operate equipment on site.

Operation of the equipment is carried out exclusively by operators fully trained in safe working practices, fully familiar with the safety features of the equipment.

Each individual operator has access to operation and maintenance manuals of the equipment they use.

8.3 Site Security

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

9 ACCIDENT PREVENTION AND MANAGEMENT

Potential accidents and incidents have been identified in the tables on the following pages.

Accident prevention and management will be reviewed on an annual basis along with the Management System or following an accident.

Emergency contact:

Jeremy Pudge: +44 (0) 74962 51080 (Technical & Compliance Manager)

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
Transferring substances (spillage during handling between vessels)	Groundwater Superficial: secondary undifferentiated superficial aquifer. Bedrock: principal aquifer Geology Superficial and Drift: tidal flat deposits described as clay, silt and sand. Bedrock and Solid: Kinnerton	Through damaged impermeable surface	Should there be a spillage of an oil or a fuel then contamination may occur, however, these materials are rarely used on site and only handled under controlled conditions.	VERY LOW	Transfer of all substances to be undertaken using a drip tray. Continual monitoring and maintenance of surfaces.	Spillages will be cleaned up immediately upon detection. Spill kits located at strategic locations around the site will be deployed in the event of spillage. Details of the spillage will be recorded and retained. In the event of a significant spillage which has the potential to cause environmental pollution the NRW will be

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
	Sandstone Formation					informed as soon as is reasonably possible.
	Neighbours: adjacent commercial activities Closest residential property 895m SE Grade II listed building 255m S.	Dispersion through the air	Dust and litter nuisance to surrounding neighbours.	VERY LOW	Materials received on site within the building Materials received on site are unlikely to be easily windblown or dispersed in the form they are delivered Waste treatment within fully enclosed filtered LEV system Storage of dust/fibres in	
	Sensitive public use >1km from site.					

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
					sealed containers, with no transfer required prior to dispatch.	
Plant or equipment failure	Site workers	Direct contact	Severe personal injury could result.	LOW	All site personnel must always wear PPE and be trained in the safe operations of plant and equipment. Plant and equipment are maintained in accordance with a strict maintenance schedule to ensure risk of	Record and retain all plant and equipment failures on site. Where plant or equipment failure has the potential to cause injury or pollution ensure that issue is clearly communicated to all relevant individuals to prevent further use.

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
					breakdown or failure is minimal.	Where plant or equipment failure results in a leak or spillage ensure the spillages is cleaned up immediately upon detection and the faulty plant/ equipment is stored on impermeable surface.
	Groundwater Superficial: secondary undifferentiated superficial aquifer. Bedrock: principal aquifer.	Through damaged impermeable surface	Contamination of surrounding area and dispersion within the wider groundwater environment.	VERY LOW	Spill equipment available should oils or fuels be released from plant or equipment. Plant and equipment maintained in accordance with a strict maintenance programme to ensure a limited risk of failure.	
	Geology Superficial and Drift: tidal flat deposits described as clay, silt and sand.					

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
	Bedrock and Solid: Kinnerton Sandstone Formation					
Fire	Site operatives and infrastructure Neighbours: adjacent commercial activities Closest residential property 895m SE Grade II listed building 255m S	Direct contact	Loss/damage of property. Injury. Business disruption.	LOW	Low quantities of combustible wastes stored on site for limited amount of time. Fire risk managed according to a site specific Fire Prevention Plan (K419.1~09~003). All plant and equipment maintained to a schedule.	With ongoing maintenance of plant and equipment risk of fire is low. Follow procedure outlined in the Fire Prevention Plan (K419.1~09~003). Management systems for business continuity will aid in the event of a fire.

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
					Key business processes and documentation stored remotely for business continuity purposes.	
Storage of hazardous substances	Site operative	Direct contact	Injury or ill health.	MEDIUM	Hazardous waste treated within a fully enclose system with LEV and stored in sealed containers, with minimal transfer between containers.	All hazardous substances stored in suitable containment with bunding (where applicable). Hazardous substance storage areas are

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
					Small amounts of oil and fuel for machinery. If handled personnel must be wearing appropriate PPE.	separate from operational areas. All hazardous substances will be stored in secured containers which will be locked when not in use.
	Groundwater Superficial: secondary undifferentiated superficial aquifer. Bedrock: principal aquifer.	Through damaged impermeable surface	Contamination of underlying ground and groundwater.	VERY LOW	Spill equipment available should oils or fuels be released. Continual monitoring and maintenance of surfaces	
	Geology					

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
	Superficial and Drift: tidal flat deposits described as clay, silt and sand. Bedrock and Solid: Kinnerton Sandstone Formation					
Vandalism	Plant and Equipment or site infrastructure	Direct contact	Impact on business processes	LOW	The site entrance is secured by a gate. Building is secured and locked over night or during non-operational periods.	Ensure vandalism is not resulting in an environmental pollution incident. Inspect the site for damage and record and retain results.

Possible Accident/Incident	Receptor	Pathway	Consequence	Likelihood	Risk Management	What to do if the accident/incident occurs
Flooding	Site infrastructure	Direct	MEDIUM	LOW to VERY LOW	Site within Flood Zone 2: when the presence of flood defences are ignored) low risk of flooding. Flooding is unlikely to be significant.	Ensure flood does not result in an environmental pollution incident.

10 WASTE MANAGEMENT

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

11 TRAINING AND COMPETENCE

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

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

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

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

It is the responsibility of Senior Management and the Technical Competent Manager to ensure that no unauthorised persons operate equipment on site.

Operation of the equipment is carried out exclusively by operators fully trained in safe working practices, fully familiar with the safety features of the equipment.

Each individual operator has access to operation and maintenance manuals of the equipment they use.

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

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

12 COMPLAINTS

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

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

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

13 DOCUMENTS AND RECORDS

As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the permit;
- Other legally required documents;
- Risk assessments;
- Operational procedures;
- Competence and training records;
- Compliance records; and
- Duty of Care documentation and NRW waste returns.

Records must be retained for 6 years; unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender

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

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

Records will be kept in accordance with The Waste (England and Wales) Regulations 2016 (as amended), and conditions of the Environmental Permit.

13.1 Incidents of non-compliance

Any incident of non-compliance with the permit that has caused, is causing or may cause significant pollution or is in breach with condition of the permit shall be recorded.

Any incidences will be investigated by a senior manager and where corrective actions are identified these shall be recorded. Actions will be allocated to a suitably trained individual, alongside a description of the relevant preventative or corrective action and a timescale for completion.

The format of any investigation and how it is recorded shall be determined by the type and scale of non-compliance and the associated impact. An investigation will incorporate some if not all of the following and supplemented where required, under the guidance of a senior manager:

- Review details of non-compliance; location, type of impact, affected parties

- Investigation of operational activities; what activities were occurring at time non-compliance was recorded, how are they impacted, or do they support cause of the non-conformance?
- Investigation of operational controls; are all specified operational controls being followed? Are they sufficient?
- Investigate other potential sources;
- Corrective or preventative action; coordinated as specified above.
- Feedback; Provided to operators or other relevant parties as required.
- Review incidents of non-conformance to ensure any trends or repeat behaviours are identified and rectified if necessary.

14 ENVIRONMENTAL MANAGEMENT

14.1 Litter Control

Given that all waste activities are carried out indoors and that the predominant waste input is solid waste contained in suitably sealed containers, the generation of litter is unlikely to be a significant issue.

However, where litter is generated the following measures are employed.

The Site is subject to regular housekeeping in order to suppress litter generation, staff are required to litter pick on a ‘see it, pick it up’ basis.

Where litter is identified as a nuisance on the Site boundary, the TCM and management will immediately organise the collection of litter by staff. Priority will be given to eliminating the source, following which off-Site areas and the Site boundary will be cleared. The source of the litter will be investigated and removed to a container ready for disposal.

14.2 Odour Control

The site will not be permitted to accept any wastes which are associated with odour generation.

If an odorous waste is received onsite it will be quarantined immediately and removed from site as soon as is reasonably possible.

Any odour complaints received at the site will be investigated immediately

14.3 Dust Control

The process most likely to generate dust is the shearing of the catalytic converters. This is carried out within a fully enclosed system with LEV system to extract and collect any dust/fibres released.

The system has an extraction flow rate in excess of 2,000 m^3/h, and is equipped with filters designed to capture all dust/fibres generated by the process.

The extraction of dust/fibres is directly collected by the sealed container used for storage of the dust/fibres prior to disposal avoiding the need for transfer of dust/fibres between containers hance avoiding generation of significant amounts of dust/fibres.

14.4 Noise Control

Potential sources of noise and vibration on site are the HGVs delivering the waste and the equipment used for handling and treatment of the waste.

The following noise attenuation measures are in place on site:

- All operations are carried out within a building, surrounded by other commercial activities. The closest residential property 895 m southeast of the site.
- The amount of waste throughput ensures small number of HGV's movement for incoming waste materials brought to the site.
- The Standard "EN ISO 11200: Acoustics - Guidelines for noise emitted by machinery and equipment "has been applied in the design and construction of the shear and extractor.
- All equipment used is well maintained and effectively silenced.

In normal operating conditions the generation of noise pollution from the site activities is unlikely to be a significant issue.

If noise complaints are received in relation to the activities covered by the Environmental Permit these will be discussed with the TCM and, where necessary, action taken to deal with immediate consequences.

In the event that a complaint is received either directly from a neighbouring resident or indirectly via a regulatory body. The name, address and contact details of the complainant will be sought.

The Operations TCM will then investigate the complaint to determine the cause and implement any corrective and preventative actions.

Timescales will be determined for follow-up of the corrective actions and determination of their effectiveness.

14.5 Pests, Vermin, Birds

The types of wastes accepted, stored and treated at the site are unlikely to generate significant issues relating to the attraction or harbouring of pests, vermin or birds.

All reasonable measures will be taken to prevent and minimise the occurrence of pests. Daily site inspections and good housekeeping procedures will be maintained in order to reduce any occurrence and allow appropriate measures to be taken where necessary.

If an increase in a pest population is observed, the source will be investigated in order to undertake the most effective mitigation measures.

14.6 Mud and Debris

The process areas will be underlain by impermeable surface. The origin of the waste and route taken by the carriers reduces the likelihood that mud and debris will be tracked on to site and/or back on to the highway.

The likelihood of vehicles carrying significant volumes of mud or debris which would then be tracked onto main roads will be limited, however vehicles will be checked in wet conditions.

Any vehicles found to be carrying mud or debris on the wheels or chassis will be cleaned down prior to exiting site.

15 EMISSIONS AND MONITORING

There are no point source emissions to air, water or land from the process.

Appropriate measures have been taken to control emissions of substances not controlled by emissions limits.

16 EMISSIONS TO AIR, WATER AND LAND

There are no point source emissions to air, water or land from the process.

Appropriate measures have been taken to control emissions of substances not controlled by emissions limits.

17 REVIEW THE MANAGEMENT SYSTEM

The Management System Summary will be reviewed in its entirety at least annually or following any substantial change in site operations.

Other activities which may prompt review of the Management System are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review results in required changes this will be documented and maintained with the site records, for example, waste storage volumes, changes to abatement measures, new or altered equipment.

18 SITE CLOSURE

TeleCycle Europe Ltd will plan for the closure of the site through maintaining the Site Condition Report.

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

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

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