ENVIRONMENTAL FOCUS LTD

Achieving Compliance & Quality

Environmental Management System

LCS Scrap Metals Ltd

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Requirement:	Environmental Management	EMS-annually reviewed
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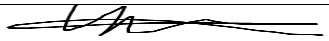
Signature:		Gareth Danter-Hill
Version number and date:	Version 1	Review due October 2023

All work that is carried out as part of this agreement is on an advisory basis only. No liability will be taken by Environmental Focus Ltd for any works undertaken by the client as the service is based on recommendations and advice only.

Introduction

This EMS is designed to highlight and dictate the on-site processes for the company should they be used on site. It will be subjected to regular review in line with operational and legislative changes. The document has been produced in line with current best practice and in accordance with all relevant legislation.

The following documents were used as to aid the formulation of this management system and the associated documents. The standards outlined within these documents will be adhered to throughout site operations:

How to Comply, SGN5.06, H1 guidance, H4 guidance.

TCM

The site TCM has successfully upgraded his qualifications to enable him to act as the competent member of staff on site. These certificates have been provided to NRW.

Site Operations

For all waste accepted on to the facility full upstream checks are to be carried out before new waste types or suppliers are to be allowed to import waste on to site where appropriate.

Pre-acceptance Procedures

The pre-acceptance procedures adopted at site are in accordance with the Sector Guidance Note 5.06 section 2.1.1 and the relevant guidance notes where appropriate. In order to ensure that unsuitable wastes are not accepted onto site, the senior management team will be used to ensure that the materials delivered are suitable to be recovered on site. This will be done by checking that the waste being delivered firstly is coded correctly and secondly whether the EWC code is on the list of permitted wastes at site. This assessment will be visually and olfactory only. If it is deemed that the wastes are not suitable to be recovered on site as a result of these procedures; they will not be accepted and will be returned to the waste producer.

A pre-acceptance screening procedure will be used to ensure that the wastes that are being proposed for delivery comply with firstly the requirements of the environmental permit held and secondly, whether the wastes are suitable to be recovered. This process will involve a review of information from the waste producer.

All waste deposits to be utilised within the treatment process will therefore be pre-booked for acceptance to site.

On arrival all wastes will be visually checked to confirm that they meet the description and EWC assigned by the waste producer. If not, they will not be accepted on to site for any recovery operation and will either be returned to the waste producer or quarantined on site.

Pre-booked deliveries will have to have the following information assigned to them:

- How the waste was derived including any variability within the process.
- The EWC code assigned for the waste.

- Chemical analysis (if required) and composition of the waste.
- Quantity of waste to be delivered.
- Any hazards within the waste.
- Contingency plans for non-conforming waste should the need arise.

Testing (if required) of feedstock supplies will identify the following:

- Nature of the waste and how it has arisen
- Any variations in the feedstock
- Inhibitory values in the feedstock
- Biodegradability of the feedstock

Wastes should not be accepted at the installation without a clear method or defined treatment and disposal/recovery route with a full costing.

Acceptance procedures

All wastes that are received at site are both visually checked when tipped off and during treatment operations.

Duty of care paperwork is checked by the operative in the reception area to ensure that the waste is compliant with the EWCs on the permit of the site.

All vehicles that are depositing materials onto site will be directed to the waste reception area by the foreman on site. When the load is tipped off, the contents are visually checked for contaminants and to see if the waste matches that described and coded on the accompanying transfer note.

Due to the nature of the waste and how it is collected, there is inevitably going to be a certain amount of contamination in the waste. However, due to the type of waste being accept this is not foreseen to be a major issue. The cars that are collected may have some small-scale wastes (paper etc) in the seating area or the boot but this will simply be emptied into a bin on site.

Waste will then be stored in the appropriate area for the waste type for bulking up and onward processing. Wastes will remain on site for short periods of time only.

For all loads received, a detailed record is kept that will contain the following information:

- Description of waste
- EWC code
- Date and time of delivery
- Weight of load
- Waste carriers registration number

A log is kept (for waste return purposes) of all waste that is accepted at site. This log is checked each month and this ensures that the permitted tonnage will not be breached. If this figure is reached, then waste rejection procedures (detailed below) will be initiated to remain compliant on site.

These records will be kept in the site offices in dedicated files so that inspection of loads can be simply carried out.

The tracking system should operate as a waste inventory/stock control system and include as a minimum:

- date of arrival on-site
- producers details
- all previous holders
- a unique reference number
- pre acceptance and acceptance analysis results if required
- package type and size
- intended treatment/disposal route
- record accurately the nature and quantity of wastes held on site
- where the waste is physically located in relation to a site plan
- identification of operators staff who have taken any decisions re acceptance or rejection of waste streams and decided upon recovery / disposal options

The adoption of such a tracking system will allow for accurate figures with regards current storage and treatment tonnages on site at any one time to be provided.

Rejection procedures

Waste shall only be accepted at site if it conforms to the list of permitted wastes and if it conforms to the written description of the waste producer.

If, in the unlikely event a waste is accepted onto site that does not comply with the above then the usual site rejection procedures will be enforced:

- The waste will be separated from any other wastes currently on site and will be stored on an impermeable surface that benefits from sealed drainage (if deposited).
- The driver of the load will be instructed to return the load and provided will detailed reasons as to why the load has not been accepted at site (if not deposited).
- NRW will be informed of the non-compliant load and sent a copy of the on-site log of the activity that will detail the origin and carrier of the load.

On site treatment processes

The site is designed to store, separate and bulk up wastes accepted from a variety of sources. The primary function of the facility is to separate all recyclable materials by a combination on manual and mechanical processes. To facilitate in the storage of these wastes further processes may be undertaken if required. However, at present this is not required as the vehicles are removed from site when fully depolluted.

The site is currently permitted to accept up to 5,000T throughput per year of the permitted waste types in the form of vehicles and up to 20,000T throughput of metal wastes.

The site is split into several processing/storage areas:

- Waste reception: The waste received on to site is unloaded in this area for inspection and determination of processing. Within this area wastes that require manually depollution are segregated and diverted to the depollution building. The materials will be separately stored depending on waste type and kept in dedicated areas pending onward recovery elsewhere. For example, all tyres will be stored away from other materials, so contamination of other wastes is reduced.
- Waste metal storage: The waste storage areas are designated zones where the storage of segregated materials are held pending onward processing. When the stockpiles within these zones are full, they are removed from site and taken for onward recycling.
- Depollution: There are only 5 cars to be stored within the depollution bay at any one time. One vehicle will be processed/stored in the actual depollution bay. Up to 10 vehicles awaiting the depollution process will be stored on the concrete surface outside.

Scrap metal treatment and storage

The largest proportion of waste accepted through the site is scrap metal (not vehicles). Once checked and accepted on site the metals are separated via manual and/or mechanical means to either be stored as ferrous or non-ferrous metals. Some of the metals will be cut to reduce the size of the material, this is to help with the practicalities of storage only.

Once stored in the appropriate form and stockpile, the material will be sent from site for recovery. The loads will either be sent out in their loose form or baled where appropriate to ensure the most economical transportation methods.

ELV depollution process

As a minimum the following technical requirements will be followed to maintain good practice when depolluting ELVs:

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 other fluid 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, 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 suggested depollution process on site to be done when vehicle is grounded:

*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;

Then, once vehicle is suspended in depollution frame or lifting device:

*Drain engine oil 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 tank;

*Drain shock absorbers or remove suspension fluid;

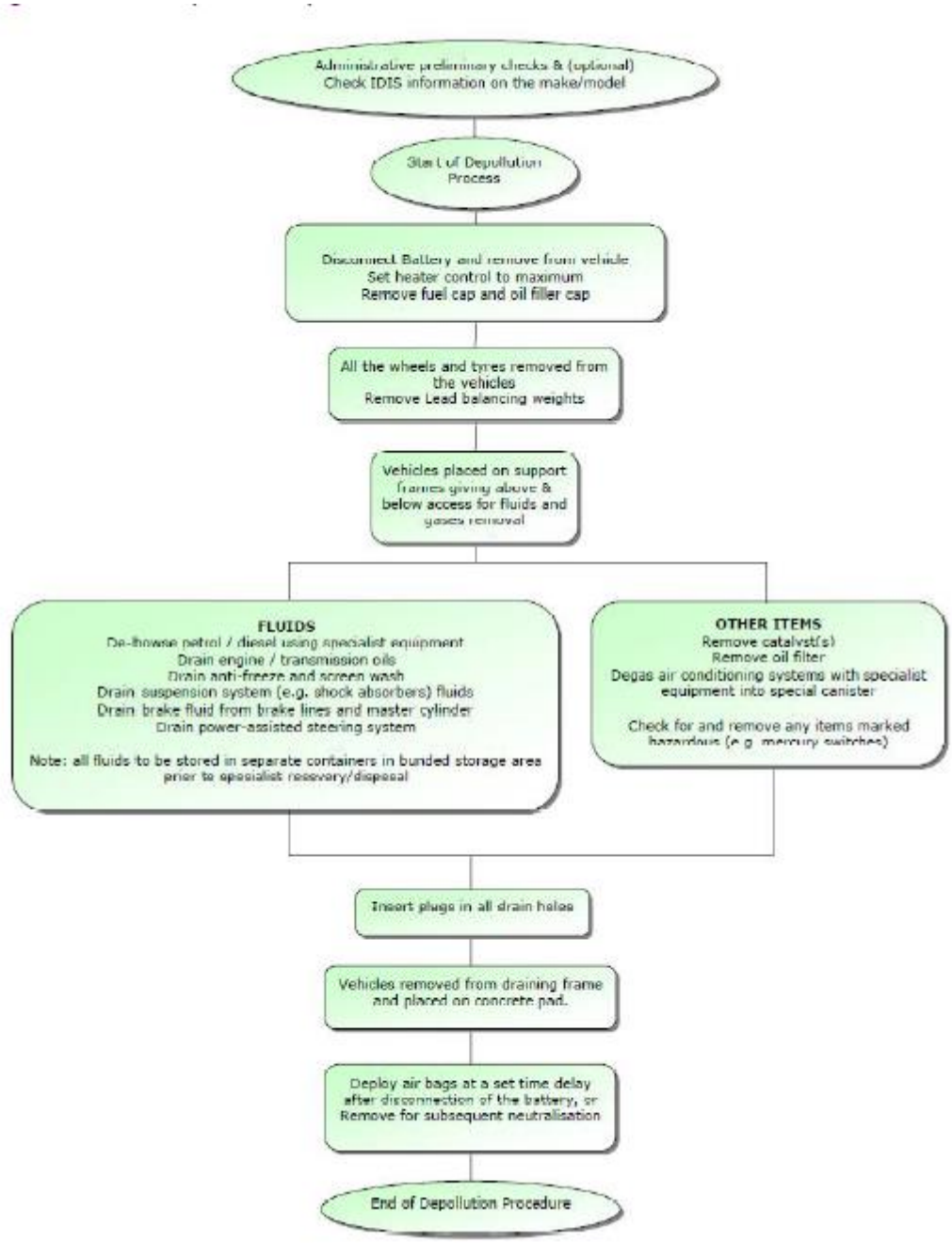
*Replace drain plugs/fit plastic stoppers;

*Remove vehicle from depollution frame or lifting device;

*Deploy airbags and other pyrotechnics in-situ (if fitted and able to conduct this operation);

*Remove air bags and other pyrotechnics (if fitted and cannot be deployed in-situ).

ELV Process Flow



Permitted wastes

The site shall only accept the wastes identified within the relevant tables within the Standard permit held.

Staff Training

The site manager is responsible for ensuring that all staff working at the site are competent in the duties required of them. An induction training programme will be carried out if required and signed by each member of staff, this is also the case for ongoing training sessions and toolbox talks etc.

Site Infrastructure and drainage

The site building is served by a sealed drainage system. The building is sealed and so any liquids that are created through spillage etc will not flow outside of the immediate area. The perimeter of the building is sealed by a concrete bund. All liquids will be contained within the building and site boundary.

All clean water such as rainwater from roof tops etc are diverted away from the waste storage areas where possible.

Road vehicles will use the access road and the front area of the site only, therefore the creation of mud and debris, is anticipated to be minimal. If this does however become an issue, wheel-washing facilities can be made available on site as part of the maintenance area.

Every effort will be made to control any leaks and spillages from occurring in the first instance. However, it is recognised that liquid wastes from spillages and plant failure can occur. Every incident of this type will be classed and treated as an emergency on site. Spill kits will be held within the site and used as and when required. The now contaminated materials used, will be cleaned up and held in isolation until they are consigned off site to an appropriate facility.

Any spillages or leakage will be reported to NRW, along with the on-site spillage remediation paperwork following the appropriate procedures below.

Fire on site

Please see the supplementary FPMP for the on-site procedures for dealing with a fire incident on site as well as the storage and mitigation measures etc.

Emissions

Due to the effective processing of waste and quick turnaround of removal from site, emissions of any type are not anticipated to be an issue. However, if pests are noticed to increase, measures will be initiated to control the issue. This may be a review of incoming material or the employment of pest control specialists.

Litter will be managed on site daily via visual checks. Due to the waste types being tipped and sorted within the site, wind-blown wastes are not thought to be an issue. However, if waste is noticed within the surrounding yard area, an operative will be tasked to pick all litter created and ensure it is stored appropriately. When the storage areas are full and are being stored pending removal from site, if litter is being created, they will be stored under a netting (or similar) to ensure that wind-blown material is reduced.

Spillage procedure

All staff are to wear the required PPE to ensure work is carried out safely.

- Identify the source of the spill
- Communicate the source of the spill to required staff
- Deploy spill kit asap
- Isolate the drains if possible
- Once the spill has been cleared, ensure correct disposal of spill kit materials
- Record/log spill in site diary
- Inform NRW and DCWW (if appropriate)
- Initiate a re-stock spill kit
- Undertake an incident review/investigation

Once an internal review has been undertaken, all relevant staff will be informed of the findings and training logs will be updated if required. As a minimum, the review will cover the cause, actions taken, resources used, missed opportunities and prevention measure effectiveness.

Annex List

A--External Complaint Form

Date and time of complaint:	Complaint reference number:
Name of complainant (if available):	
Contact details of complainant (address and phone number):	
Date and time of incident (if different):	
Detected location of complaint/ emission (NGR if available):	
Weather conditions:	
Wind direction and speed:	
Complainant description of issue:	
Other comments/observations from complainant:	
Receptor Sensitivity: (Low, medium or high) Previous complainant (Y/N):	
Mitigation Report reference number:	
Form completed by (sign and date):	

Impact rating	Description
0	No impact (unsubstantiated report)
1	Very slight impact
2	Slight impact
3	Distinct impact
4	Strong impact
5	Very strong impact
6	Extremely strong impact
Receptor Sensitivity: Low (footpath, road) Medium (ind./com. premises), High (Residential)	

B—Mitigation Report

Report Completed by:	
Date and Time:	

Responsible member of management:	
Report Reference:	
External Complaint Reference Number:	
Confirmed Source of complaint:	
Suspected Source:	
Weather Conditions:	
Wind Speed and Direction:	
Further Action Required on Site?	
Corrective Actions Undertaken:	
Issue Eliminated at Site:	
Impact Eliminated at Detection Location:	

Complainant Contacted by:	
Date and Time:	
Incident Closed by:	
Date and Time:	