



AC
ENVIRONMENTAL
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Environmental Management System



Blancomet Recycling UK Ltd

Unit 18C, Freemans Parc, Penarth
Road, Cardiff, CF11 8EQ

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1. LOCATION

Blancomet Recycling UK Ltd is seeking to obtain a bespoke environmental permit to operate a Catalytic Converter (CAT) centre at Unit 18C, Freemans Parc, Penarth Road, Cardiff, CF11 8EQ. The permitted area will be a small-scale operation situated within an industrial unit that will store CATs, lead-acid batteries, alloy wheels, and wiring looms. A maximum of 650 tonnes of CATs will be accepted per annum, and it is expected that 2-3 tonnes per day will be accepted on average. The annual tonnages for lead-acid batteries is 1500 tonnes, wiring looms is 1500 tonnes per annum, and alloy wheels has a maximum tonnage of 500 tonnes per annum. The site consists of an industrial unit within a larger industrial estate which is surrounded by additional industrial and commercial properties with open woodland (including Cwm Cydfin, Leckwith SSSI) to the west, and residential houses beyond to the north, east and west. Reference to the DEFRA Air Quality Management Area (AQMA) interactive map indicates that the site is not within an AQMA for any pollutants (NO_x, PM₁₀, SO₂).

The site is located within an area classified Flood Risk Low, indicating that this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%) each year. The nearest residential housing is located approximately 432m to the north-northeast on Blaise Place.

2. HISTORY

Reference to historical IOS maps indicates that the site consisted of open field (possibly farmland) for all the recordings including dates: 1898, 1915, 1938 and 1941. Google Earth imagery illustrates the site has been an industrial park and unit since 2001.

3. OPENING HOURS

The site's operating hours are as follows:

Monday – Friday: 07.00 – 18.00

Saturday: 07.00 – 14.00

Sundays and Bank Holidays: Closed

4. SITE DESIGN

4.1 Design

The site layout is designed to ensure freedom of movement. The site is fully concreted with an impermeable concrete surface and is contained within an industrial unit building which is part of a larger industrial estate.

Access for the Fire and Rescue Service will be gained from the roller shutter doors on the on the eastern side of the unit building.

The unit consists of an office portacabin, mobile plant storage area, an area for the hand-sorting of CATs, and Dolav boxes for the secure storage CATs.

CATs will be brought on to site mainly by Blancomet's own vehicles and occasionally through third party contractor vehicles and will be delivered directly to the roller shutter door for immediate visual inspection and sortation. CATs will be sorted between those with a steel and those with a ceramic internal matrix before being stored in the Dolav boxes.

There are 7 UKAS accredited CCTV cameras installed within the unit building. The unit is also equipped with AFFF fire extinguishers to work alongside the Fire and Rescue Service when extinguishing a fire.

4.2 Vulnerable Locations

There are sensitive receptors within 1km of the site, the closest being the residential properties located approximately 432m to the north-northeast. Within the 1km radius from the site, there are educational sites, as well as there being a SSSI within the area, waterways and railway lines. In terms of educational facilities, the closest is Ysgol Gynradd Parc Ninian Park Primary School located 737m north-northeast of the site, with Ysgol Gynradd Babyddol Sant Padrig / St Patrick's R C Primary School being 935m north-northeast of the site. Grangetown Primary School is located 983m northeast from the site and St Pauls Primary School is located 794m east-northeast of the site. The railway line runs to the east of the site, with the nearest point being approximately 348m away. To the west of the site runs the River Ely, with part of the river (alongside the woodland to the west of it) being in the Cwm Cydfin, Leckwith SSSI, which is approximately 674m south-southwest from the site area.

Due to the distance of the site from the sensitive receptors, all processing being undertaken indoors and the mitigative measures in place, the nearby receptors are at very low risk of experiencing adverse impacts from the site. The site is fully surfaced with impermeable concrete, has water containment measures and pollution control measures in place to prevent pollution e.g. spill kits and FloodSax barriers. In the event that sensitive receptors may be at risk, they will be notified by phone call or by site operatives knocking on doors and informing them of the incident and reassuring them that every measure is being taken to control and rectify the situation.

4.3 Drainage

The permitted area is entirely indoors and therefore there is no concern regarding run-off from rainfall and therefore no site drainage is necessary. Any potential spillages will be dealt with appropriately within the permitted area using the spill kit that is provided on site.

The site is entirely surfaced with an impermeable concrete surface.

Contaminated flood and fire water will be contained by deploying the FloodSax barriers which will prevent water from draining off site into the main sewer.

4.4 Water, Gas and Electricity

The water on site is supplied by Dyr Cymru (Welsh Water). The electricity and gas on site are supplied by SSE.

4.5 Waste Handling

Blancomet Recycling Ltd is seeking to obtain a bespoke environmental permit to operate a Catalytic Converter (CAT) centre at Unit 18C, Freemans Parc, Penarth Road, Cardiff, CF11 8EQ. The permitted area will be a small-scale operation situated within an industrial unit that will store CATs. A maximum of 650 tonnes of CATs will be accepted per annum, and it is expected that 2-3 tonnes per day will be accepted on average. The annual tonnages for lead-acid batteries is 1500 tonnes, wiring looms is 1500 tonnes per annum, and alloy wheels has a maximum tonnage of 500 tonnes per annum.

The permitted area comprises of a small unit building which will house all site operations. There is one roller shutter door on the eastern boundary which will remain closed at all times deemed appropriate. The unit consists of a toilet block, mobile plant storage area, CAT sorting area, and areas for the storage of CATs. The site has an existing concrete surface.

CATs will be brought on to site by a mix of both Blancomet's vehicles and third-party vehicles and will be delivered directly to the roller shutter door for immediate visual inspection and sorting. CATs will be sorted between those with a steel and those with a ceramic internal matrix before being stored in the Dolav boxes, prior to dispatch to another Blancomet site which is permitted to treat the CATs.

The site will handle both hazardous and non-hazardous waste. The non-hazardous waste consists of the steel matrix CATs, and the non-ferrous alloy wheels. The hazardous material on site are the wiring looms, lead-acid batteries, and the ceramic matrix CATs. The ceramic matrix CATs and are classed as high-risk material due to them containing refractory ceramic fibres (RCFs). Therefore, hazardous waste will be removed from site within 7 days. The non-hazardous material will be retained on site for a maximum of 30 days.

5. SITE OPERATIONS

5.1 Waste Types

The range of wastes handled on site are described above in section 4.5. All the waste accepted at the site will be in accordance with the Environmental Permit for the site.

All wastes are contained within Dolav boxes or bulk bags within the permitted area (as shown on Drawing Ref: 230718BC101), the EWC codes of said wastes have been provided in the table below.

| Waste Code | Description of Waste |
|------------|---|
| 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 |
| 16 01 22 | components not otherwise specified |
| 16 06 01* | lead batteries |
| 16 01 18 | non-ferrous metal |

5.2 Waste Storage and Handling

All waste within the permitted area is stored in the enclosed building within either Dolav boxes, or bulk bags. The site also consists of a toilet, mobile plant storage area, an area for the hand-sorting of wastes, and storage areas for the different waste types.

The site will handle both hazardous and non-hazardous waste. The non-hazardous waste consists of the steel matrix CATs, alloy wheels, and wiring looms. The hazardous materials on site are ceramic matrix CATs, lead-acid batteries, and wiring looms (containing POPs), which are classed as high-risk material and therefore will be removed from site within 7 days. The non-hazardous material will be retained on site for a maximum of 30 days. A first in first out (FIFO) procedure is in place to ensure that stock rotation is in practise in order to remain in accordance with the retention time of one month. This will reduce the risk of the production of odour and dust. This will also ensure that stockpiles do not breach the size limits within the Natural Resources Wales guidelines and the Environmental Permit.

The table below illustrates the stockpiles on site and the maximum volume for each. As per the Natural Resources Wales guidance, a 6m distance between stockpiles is preferable, however stockpiles 1, 3, and 4 have been combined due to the lack of 6m distance and has been mirrored in the table below:

| Waste stack Number | Material Type/Waste stacks | Form | Location | Maximum Amount in each area (m ³) |
|--------------------|---|-------|------------------|---|
| 1 3 4 | Lead-acid Batteries Wiring Looms Alloy Wheels | Solid | Covered Building | (x 22 Dolav boxes) 19.54 (x16 bulk bags) 11.66 (x8 bulk bags) 5.83 Total= 37.03 |
| 2 | CATs | Solid | Covered Building | (x21 Dolav boxes) 18.65 |

5.3 Retention Times

The site will handle both hazardous and non-hazardous waste. The non-hazardous waste consists of the steel matrix CATs, alloy wheels, and wiring looms. The hazardous materials on site are ceramic matrix CATs, lead-acid batteries, and wiring looms (containing POPs), which are classed as high-risk material and therefore will be removed from site within 7 days. The non-hazardous material will be retained on site for a maximum of 30 days.

| Material Risk Rating | Timescale |
|--|---------------------------------------|
| Low Risk Material (steel matrix CATs, alloy wheels, wiring looms) | Material will be retained for 30 days |
| Higher risk material (ceramic matrix CATs, lead-acid batteries, wiring looms (POPs)) | Material will be retained for 7 days. |

5.4 Pre-Acceptance Procedures

Prior to waste being brought onto site, customers who produce and deliver waste will be advised that the site will not accept any loads that contain EWC codes not specified on the list in section 5.1. It is crucial to note that the site will only accept waste with the same EWC codes outlined in section 5.1. Advising customers will significantly reduce the risk of non-conforming waste from entering the site.

5.5 Waste Acceptance Procedures

Waste reception and handling is subject to Site Working Procedures. Loads are inspected by site staff at the point of collection prior to being accepted. Wastes are also supervised to that any issues which were hidden and not identified prior to receipt can be seen in accordance with procedure SWP007 (Appendix 3) and the site's Fire Prevention Plan Ref: B.PT.FPP.2307.

Any non-conforming materials found in the waste will be dealt with in accordance with the rejecting waste procedures Ref: SWP015 (Appendix 4).

Wastes are handled in accordance with various requirements of the planning permission, the Environmental Permit, and the requirements of the end market. These operations have been outlined above in Section 4.5.

5.6 Non-Conforming Waste

Every load brought onto site will be inspected by an operator. Any loads that contain non-acceptable materials will be rejected in accordance with the rejecting waste procedure Ref: SWP015 (Appendix 4).

Non-conforming materials found after entering the site will be segregated immediately and stored under suitable conditions before being dispatched to a suitable permitted facility.

If the same waste stream is regularly found to contain non-conforming materials, then a review of the acceptance procedures will be undertaken. This involves a discussion with the waste producer to resolve the issue and prevent any further occurrences.

If it is necessary, non-conforming loads shall be reported to the appropriate authorities.

5.7 Hazardous Waste

The site accepts hazardous in the form of ceramic matrix CATs due to the RCF found within them. Lead-acid batteries and wiring looms containing POPs are also hazardous wastes that are accepted by the site. This waste is delivered by the site's own vehicles or third-party contractors. On arrival, all waste is inspected at the entrance by the site staff to ensure that the waste delivered to the site meets the following criteria:

- EWC Code on the waste transfer note conforms to the waste inside the container.
- Permit waste acceptance criteria – waste meets with the criteria of the environmental permit and the planning permissions for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.

If non-conforming hazardous waste is identified upon arrival, the load will be rejected immediately.

Once the waste has been accepted, it is sorted immediately to separate non-hazardous wastes from hazardous wastes- this is particularly important for CATs and wiring looms as both these wastes can be hazardous or non-hazardous. The wastes are stored in the Dolav boxes or bulk bags until dispatch to another Blancomet site, which is suitably permitted to process the wastes.

5.8 Weighing Facilities

The site does not have a weighbridge on site. There are a set of industrial platform scales on site. Tonnages of materials handled will be recorded in accordance with Natural Resources Wales guidance and shall be used to provide data for waste returns.

5.9 Operating Arrangements

The site operates a forklift truck and a Ford Connect. The forklift truck is used for daily site activities and is stored in the designated plant storage area out of hours or when not in use. The Ford Connect is not stored on site when not in use and out of hours.

5.10 Inspections & Maintenance

Company vehicles will be used to transport CATs to and from the site, with the occasional use of 3rd party contractor vehicles. The forklift truck is used for daily activities and is subject to a planned maintenance programme to minimise downtime and unplanned failures. A service planner is maintained to ensure that the required inspection and servicing is undertaken in a timely manner.

Routine inspections are carried out daily by the site manager and the company COTC holder. Where any damage is found, these shall be reported and repaired within the following set timescales:

- Vehicles – 48 hours
- Drainage – 7 days
- Buildings – 7 days

If this is not possible alternative arrangements shall be made as detailed below.

A site inspection will be carried out by the company COTC holder. The results are recorded on the site inspection sheet.

As a minimum the site inspection shall consider:

- Condition of the concreted area.
- Site access.
- Unit building condition (shutter doors, walls, roof).
- Waste records.
- Site tidiness/stockpiles.
- Litter, pests, mud, dust, and odour.
- Alarm and security system.

Any issues found will be dealt with promptly and within the timescales highlighted above. A review of site inspections shall take place at management meetings. Any trends identified will be discussed and action taken to address the issues.

5.11 Site Tidiness

The site will be inspected daily by the site manager and COTC holder. Any accumulated litter, debris or dust will be removed. The site access and concrete hard standing will be swept as necessary by a manual sweeper. If potential visible accumulations of debris are identified transferring to the public highway, a mechanical sweeper will be hire immediately to clean the highway.

Stockpiles will be maintained within the limits set out in the planning permission.

5.12 Site Security

The site has not experienced any trespass or vandalism in the last few years. The security system consists of 7 CCTV cameras and intruder sensors that are designed, installed, and maintained by a UKAS accredited installer. This system has been designed to conform to PD 6662:2017 (which is the UK implementation of the European Standard EN 50131), BS 8243:2010, and SSAIB Codes of Practice. The system is capable of generating Sequentially Confirmed Alarms, for the purposes of obtaining Police response. The primary notification (signalling) will be a Dualcom Digi Air GRADE 2 modem operating via GPRS. The modem will normally relay all alarm signals to an NSI Gold monitoring station that will filter out any false alarms and failures before passing the call direct to the police.

The system CCTV is monitored by a central station upon alarm activation. They will liaise with a member of the management team who will await further instructions whether police are required. The cameras can be viewed remotely by management 24/7. The locations of the CCTV cameras are shown on Drawing Ref: 230718BC101.

The detection/security systems used are proportionate to the nature and scale of the waste management activities carried out on site. The design, installation and maintenance of all automated systems are covered by an appropriate UKAS-accredited third-party certification scheme. The detection and security system installed on site will effectively contact site management and subsequently the police in the event of an intrusion.

5.13 Dust Control

It is crucial to note that the permitted area is entirely enclosed within the industrial unit building with an impermeable concrete surface. Due to the nature of the waste accepted on site, there is little potential for dust to accumulate.

Any visible accumulations of dusts on site will be removed by hand sweeping or by a mechanical sweeper. If visible accumulations of dust are transferred onto the public highway, then a mechanical sweeper will be hire immediately. Site staff inspect the site daily for accumulations of dust in accordance with a cleaning regime which is provided in Appendix 3.

The site operates in accordance key mitigation measures to reduce the risk of the spread of potential dust to neighbouring properties such as:

- Enforcing a strict speed limit of 5mph across the site.
- Minimising drop heights when unloading waste.
- Maintaining good housekeeping across the site.

If any complaints were to arise, the site will make every effort to reduce the risk of dust and respond to the complaint immediately. Any dust issues will be dealt with in accordance with site procedures.

5.14 Noise Management

There are sensitive receptors within 1km of the site, the closest being the residential properties located approximately 432m to the north-northeast. Due to the site being situated within an industrial location within a predominantly industrial/commercial and residential area, there are multiple other sensitive receptors as outlined in section 4.2.

The site operations are not considered to be noisy and are unlikely to cause an issue beyond the site boundary.

However, measures are taken to minimise noise generated by permitted operations.

As a result, certain limitations have been implemented which restricts operations to set hours. Noise generated by permitted operations will be controlled and minimised.

Measures taken to minimise noise are:

- Only operate during working hours.
- Switch engines off whilst unloading or waiting to unload.
- When not in use vehicles will be switched off.
- Noise complaints to be recorded and investigated.

Any problems with noise will be dealt with in accordance with procedure SWP009 (Appendix 5) of the Site Working Procedures Manual.

5.15 Odour Control

The nature of waste accepted on site means that odour is unlikely to become an issue. However, the following measures are put in place to minimise odours should they occur:

- Malodorous wastes are removed from the site for disposal at the earliest opportunity and are transferred to a suitable permitted facility.
- In the event of a spillage of any fluids on site, site management will be notified, and it will be dealt with in situ immediately. There are spill kits located on site in the storage unit building.

5.16 Litter Control

There is no risk of litter due to the type of wastes accepted on site.

In the event that litter does accumulate it will be dealt with in accordance with procedure SWP008 (Appendix 6) of the Site Working Procedures Manual.

The measures taken to minimise litter are:

- Restricting the inputs of wastes which can lead to litter.
- Litter pick will be carried out by a member of staff on site.

5.17 Pest Control

Due to the waste types accepted on site, it is unlikely that pests will become an issue as they do not provide a suitable habitat for pests. Also, wastes are stored in primarily sealed containers (either completely or from the base and sides) which will prevent pests. However, if an issue does develop the following measures will be taken:

- Use of commercial products.
- Use of a professional pest service.

If a waste is causing pest issues, then it will be removed from site immediately. This waste will not be accepted again until measures have been implemented to prevent pests.

Any evidence of pests will be dealt with in accordance with procedure SWP012 (Appendix 7) of the Site Working Procedures Manual.

5.18 Flood Risk

The site is located within an area classified Flood Risk Low, indicating that this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%) each year.

Due to the negligible risk of site flooding, the site area is appropriate for the operations of Blancomet Recycling Ltd. Furthermore, the fact that the operations are contained within the industrial unit, this will mean should flooding occur, the contents within the unit will not escape the site area.

6. CONTINGENCY PLANS

In the event of a fire at the site all operations on site would cease. No vehicles other than the Fire Rescue Service or Natural Resources Wales would gain access to the site due to control of the site gates by staff. Any waste loads or customers on their way to the site will be diverted away.

In the event of a flood all operations on site would cease. No vehicles other than the Fire Rescue Service or Natural Resources Wales would gain access to the site due to control of the site gates by staff. Flood sax barriers will be deployed by site staff.

7. ACCIDENT PREVENTION AND MANAGEMENT PLAN

Please refer to document Ref: B-2023-0001-Accident Management Plan for the detailed plan. The Accident Prevention and Management Plan was last reviewed in May 2024. The plan will be reviewed and updated annually or after any incident.

8. A CHANGING CLIMATE

Climate change means that extreme weather incidents are becoming more common and more severe. Climate projections show that over the coming decades we will face an increased risk of climate change impacts, including:

- extreme rainfall, leading to more frequent and severe floods
- heat waves
- drought
- rise in sea levels and tidal surges
- storms
- wildfires

All of these could have an impact the company directly, in supply chains and for consumers and markets. Potential impacts as a result of different likely climate change aspect are outlined below.

8.1 Summer Daily Maximum Temperature

Based on current figures, this may be approximately 7°C higher than typical summer temperatures, with the possibility for extreme temperatures of more than 40°C with increasing frequency.

Potential for increased waste reactions and fires

As Blancomet Recycling UK Ltd handles only handles CATs, wiring looms, lead-acid batteries and alloy wheels, there is a very low likelihood of a wastes reaction causing a fire. It is important to note, however, that the current operating manner of the site mitigates against the potential for increased waste reactions and fires due to waste operations occurring within the enclosed building. This building, therefore, will provide shade for the materials within the building, and minimise the effect of raising temperatures on the probability of a fire occurring.

Dry vegetation in and around hot cutting areas, leading to increased fire risk

This impact is negligible to the site as the entire site is surfaced with concrete. Furthermore, all operations occur within the enclosed site building which will not have any potential for vegetation to grow.

Potential increase in high temperature expansion and stress of plant, pipework and fittings

During the daily operations of the site, mobile plant is crucial for the operations to occur. As outlined in section 5.8, routine site inspections are carried out daily by the site manager. Where any damage is found to infrastructure or plant and vehicles these shall be reported and repaired within the set timescales (outlined in section 5.8). Furthermore, the site mitigates against the risk of stress of plant through having a designated mobile plant storage area within the enclosed site building, which will help to mitigate the temperature exposed to the plant.

Potential increased dust emissions from processing areas and site roads

It is crucial to note that the permitted area is entirely enclosed within the industrial unit building with an impermeable concrete surface. Due to the nature of the waste accepted on site and the fact there is no treatment operations, there is little potential for dust to accumulate. The site operates in accordance key mitigation measures to reduce the risk of the spread of potential dust to neighbouring properties such as:

- Enforcing a strict speed limit of 5mph across the site.
- Minimising drop heights when unloading waste.
- Maintaining good housekeeping across the site.

If any complaints were to arise, the site will make every effort to reduce the risk of dust and respond to the complaint immediately. Any dust issues will be dealt with in accordance with site procedures.

8.2 Winter Daily Temperatures

This may be 4°C higher than the current average, with the possibility of greater extreme temperatures, both warmer and colder than what is experience today.

Increased risk of pipework freezing

Pipework freezing may cause leaks throughout systems in place at Blancomet Recycling. In order to combat this, insulating and provision of trace heating for exposed pipework will be reviewed should the pipework be affected. An inspection and maintenance regime is already in place, which will include checking any exposed pipes regularly.

8.3 Daily Extreme Rainfall

Daily rainfall intensity may rise by up to 20% from today's readings.

Potential for increased site surface water and flooding resulting in drainage systems and interceptors being overwhelmed

The permitted area is entirely indoors and therefore there is no concern regarding run-off from rainfall and therefore no site drainage is necessary. Any potential spillages will be dealt with appropriately within the permitted area using the spill kit that is provided on site.

No interceptor is present on site as the operations occur within the enclosed building, therefore the need for an interceptor is not required and there is no potential for any interceptors to be overwhelmed.

8.4 Average Winter Rainfall

Winter rainfall may increase by more than 40% compared to current norms.

Potential for increased site surface water and flooding

The site is located within a Flood Zone 1, indicating that the land is assessed as having a 1 in 1000 or greater annual probability of river flooding (<0.1%). This ultimately means the existing drainage in place is suitable for the area and the site operations that occur.

Potential for drainage systems and interceptors to be overwhelmed

The permitted area is entirely indoors and therefore there is no concern regarding run-off from rainfall and therefore no site drainage is necessary. Any potential spillages will be dealt with appropriately within the permitted area using the spill kit that is provided on site.

No interceptor is present on site as the operations occur within the enclosed building, therefore the need for an interceptor is not required and there is no potential for any interceptors to be overwhelmed.

8.5 Sea Level Rise

Sea level rise which could be as much as 0.6m higher compared to today's level.

If a site is located near the coast there is potential increased risk of flooding

Blancomet Recycling UK Ltd is located within Cardiff, Wales. Despite being relatively close to the sea, the site is located in a low-risk area in regard to flood risk from the sea. This is due to the area having flood defences in place against potential sea level rise.

8.6 Drier Summers

Summers could see potentially up to 40% less rain than now.

Potential increased use and reliance on mains water for dust suppression, cleaning and fire water

The site does not rely on mains water for dust suppression, therefore there is no reliance on mains water for this purpose.

Fire water comes from the fire hydrant located approximately 119m to the southeast of the site entrance on Penarth Road. It is the responsibility of the Fire and Rescue service to ensure that the hydrants conform to the British Standards to ensure that in the event of a fire, it can be put out effectively with the use of the hydrant.

Potential increase in dust emissions from a site

It is crucial to note that the permitted area is entirely enclosed within the industrial unit building with an impermeable concrete surface. Due to the nature of the waste accepted on site, there is little potential for dust to accumulate. The site operates in accordance key mitigation measures to reduce the risk of the spread of potential dust to neighbouring properties such as:

- Enforcing a strict speed limit of 5mph across the site.
- Minimising drop heights when unloading waste.
- Maintaining good housekeeping across the site.

If any complaints were to arise, the site will make every effort to reduce the risk of dust and respond to the complaint immediately. Any dust issues will be dealt with in accordance with site procedures.

8.7 River Flow

The flow in the watercourses could be 50% more than now at its peak, and 80% less than now at its lowest.

There is potential increased impact of discharge to watercourse from on-site drainage systems where connected to water courses

The site does not discharge its surface water into any river system.

Increased risk of watercourse flows being too high to allow discharge and drainage backing up on site

The site does not discharge its surface water into any river system.

8.8 Storms

Storms could see a change in frequency and intensity. The unique combination of increased wind speeds, increased rainfall, and lightning during these events provides the potential for more extreme storm impacts.

Storms and high winds could damage building structures with increased potential for fugitive emissions

Should a storm and high winds occur, the site operates within the enclosed buildings. This may impact the way in which Blancomet Recycling UK Ltd operates should the storm cause any building damage. It is important to note, however, that in accordance with the site inspections and maintenance inspections, where any damage is found, it shall be reported and repaired within 7 days. If this is not possible, alternative arrangements shall be made which are outlined in section 5.10.

9. PERSONNEL AND DUTIES

The site is operated by various personnel with discrete duties and responsibilities. A management structure is shown in Appendix 1 below.

Technically competent management is available on site. A copy of the CV and WAMITAB certificate of the COTC holder is kept on site.

10. STAFF COMPETENCE AND TRAINING

Site management is responsible for ensuring that all operatives are appropriately trained in the moving, organising and storage of waste and any other activities that are carried out on site by the operatives. Training is carried out in the form of toolbox talks.

Operatives are responsible for carrying out all daily operations. All training that is carried out on site will be recorded in either site folders, site diaries or on a computer spreadsheet. Training will be carried out annually and involve a refresher on all the relevant planning and permitting documents.

11. RECORDS

Maintenance, inspections, and all other related records will be kept inside the site office in either folders or on a spreadsheet on a computer.

The permit itself will remain within the site building, with a digital copy stored on the site computer, and by management. Should, for whatever reason, the physical copy not be accessible for interested parties, the numerous electronic copies will ensure that the permit will be able to be viewed when requested.

12. SITE CONDITION REPORT

| 1.0 SITE DETAILS | |
|-------------------------|---|
| Name of the applicant | Blancomet Recycling Ltd |
| Activity address | Unit 18C, Freemans Parc, Penarth Road, Cardiff, CF11 8EQ |
| National grid reference | ST 16970 74457 |

| | |
|--|---------------------------------|
| Document reference and dates for Site Condition Report at permit application and surrender | 12 Site Condition Report |
|--|---------------------------------|

| | |
|--|--------------------|
| Document references for site plans (including location and boundaries) | 230718BC102 |
|--|--------------------|

2.0 Condition of the land at permit issue

Environmental setting including:

- geology
- hydrogeology
- surface waters

The site is underlain by made ground according to the British Geological Survey Mapping.

The nearest publicly available borehole is located 96.1m to the west of the site and indicates that the ground consists of made ground (consisting of red and blue green mudstone fragments (marl)) to a depth of 1m, followed by additional made ground (consisting of dark silty soil with glass, concrete, gravel and bricks) to a depth of 4m. The borehole then shows soft to firm grey silty clay down to the final depth of 4.3m.

A second borehole 157.2m to the southwest of the site indicates the ground consists of made ground (topsoil mixed with mudstone and clay) 1m below ground level. This is followed by made ground (black plastic bin liners containing household waste with wood, plastic and metals), at this level there was noted to be an inflow of dirty coloured water, strong odour, oily appearance and bubbling; the hole was terminated at a depth of 1.7m. It is important to note that the record of this borehole was 06/03/1990. Since this record, a car park has been layered over the location of the borehole, which indicates that there is no longer a pollution pathway available because of the impermeable surfacing.

348m to the north of the site is the nearest publicly available borehole legible located to the north of the site. Records show a layer of black topsoil to a depth of 0.3m in this borehole. Following this, to 3m, firm, becoming soft mottled grey-brown silty clay with rootlets is visible. Clay is found below this, and it is very soft grey and silty until 5m. Medium dense sandy fine, medium, and coarse gravel is present until 6.7m, with gravel remaining until the borehole's full depth. The next segment of borehole gravel is soft grey clayey sandy silt matrix to 7.7m before the final 2.3m of boring indicates dense sandy, fine, medium, and coarse gravel to the completion depth of 10m.

| | |
|---|---|
| | <p>To the southeast of the site is the fourth borehole, located 415m away. For the first 0.3m, strong reinforced concrete is present before made ground is present to a depth of 2.5m. This made ground is soft at first, turning firm grey-brown clay with a little sand and occasional brick and siltstone fragments. After the made ground to a depth of 4.2m, firm grey mottled brown organic clay (alluvium) is present. Following this, there is more alluvium, although it is soft grey organic clay (with bands of firm fibrous peat) to a depth of 9.8m. Grey becoming grey brown sandy subangular to subround fine to coarse sandstone gravel with occasional cobbles is present for the final portion of this borehole, reaching a depth of 14m.</p> |
| <p>Pollution history including:</p> <ul style="list-style-type: none"> • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination • evidence of damage to pollution prevention measures | <p>We are not aware of Natural Resources Wales recorded pollution incidents associated with the site that may have affected the land under the ownership of Blancomet Ltd.</p> <p>Reference to historical IOS maps indicates that the site consisted of open field (possibly farmland) for all the recordings including dates: 1898, 1915, 1938 and 1941. Google Earth imagery illustrates the site has been an industrial park and unit since 2001.</p> <p>The site has an impermeable concrete surface and is entirely enclosed within the industrial unit building. In the event of a fire, the FloodSax barriers will be deployed across the roller shutter door of the buildings to contain fire water. Therefore, during any flood or fire event there will be no pollution to soils, surface water or groundwater.</p> |
| <p>Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)</p> | <p>No previous historical site investigation data or reports are available.</p> |

| | |
|--|-----------------------|
| Baseline soil and groundwater reference data | Not Applicable |
| Supporting information | N/A |

| 3.0 Permitted activities | |
|--|--|
| Permitted activities | As per Bespoke environmental permit |
| Non-permitted activities undertaken | Business Administration |
| Document references for: <ul style="list-style-type: none"> • plan showing activity layout; and • environmental risk assessment. | 230718BC104 B.PT.ERA.2307 |

| 4.0 Changes to the activity | |
|--|-----------------------|
| Have there been any changes to the activity boundary? | No |
| Have there been any changes to the permitted activities? | No |
| Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities? | No |
| Checklist of supporting information | Not Applicable |

| 5.0 Measures taken to protect land | |
|--|--|
| <p>Pollution prevention measures have been carried out and are in place at the site. The site is entirely surfaced with impermeable concrete. All waste sorting, separation and storage will be enclosed within the industrial unit building. In the event of a fire, the FloodSax barriers will be deployed along the roller shutter doors to prevent firewater from leading into the public sewer. Therefore, no pollution pathways to soil or surface and groundwater exist.</p> | |
| Checklist of supporting information | <ul style="list-style-type: none"> • Inspection records and summary of findings of inspections for all pollution prevention measures. • Records of maintenance, repair, and replacement of pollution prevention measures |

6.0 Pollution incidents that may have had an impact on land, and their remediation

There has been no evidence of any pollution incidents or spillages.

| | |
|-------------------------------------|--|
| Checklist of supporting information | <ul style="list-style-type: none">• Not Applicable |
|-------------------------------------|--|

7.0 Soil gas and water quality monitoring (where undertaken)

All wastes are deposited on impermeable concrete surface in the industrial unit building. No soil or gas monitoring is therefore considered necessary as no pollution pathways exist to soils.

No known spillages or pollution incidents have occurred whilst in ownership of Blancomet Recycling Ltd and so no pollution pathways exist to surface of groundwater. Therefore, no water quality monitoring is considered necessary.

| | |
|-------------------------------------|--|
| Checklist of supporting information | <ul style="list-style-type: none">• Not Applicable |
|-------------------------------------|--|

8.0 Decommissioning and removal of pollution risk

| | |
|-------------------------------------|--|
| Checklist of supporting information | <ul style="list-style-type: none">• None |
|-------------------------------------|--|

9.0 Reference data and remediation (where relevant)

No land or groundwater data was needed to be collected. The information from section 3, 4, 5 and 6 show that the land is in a satisfactory condition and has not deteriorated.

| | |
|--|---------------|
| Checklist of supporting information | • None |
|--|---------------|

| |
|---|
| 10.0 Statement of site condition |
| The permitted activities are to be carried out at this location. All pollution risks have been mitigated with no reported evidence or incidents of pollution or spillages. The land is deemed to be in a satisfactory condition. |

13. FIRE CONTROL AND PREVENTION MEASURES

Mains water is available on site. A fire hydrant is available near to the site which has a sufficient supply of water for firefighting purposes.

There are 8 AFFF foam fire extinguishers on site that will be used in the early stages of a fire by staff that are trained in the use of fire extinguishers. The storage areas ensure ease of access in the early stages of a fire.

Fire prevention will be practiced by the site operating in accordance with the Fire Prevention Plan Ref: B.PT.FPP.2307 and through good housekeeping.

14. COMPLAINTS

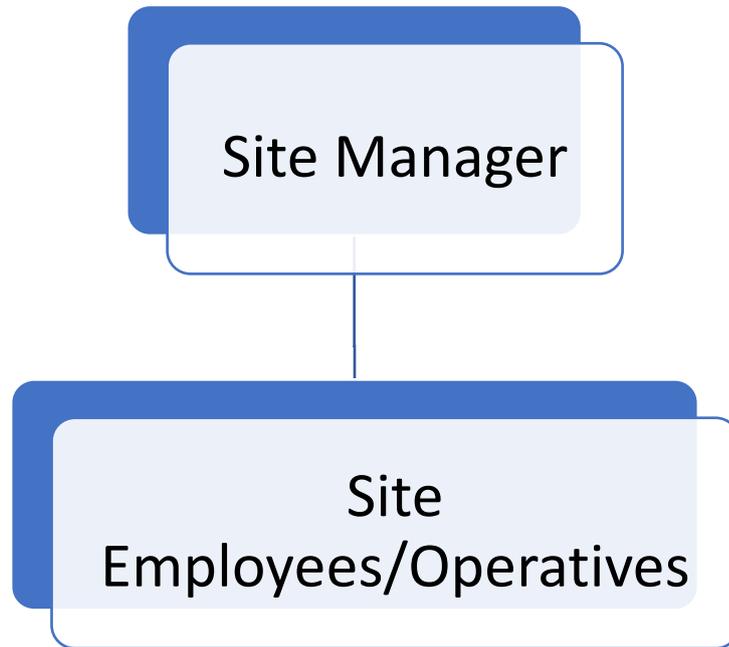
Any complaints received shall be dealt with in accordance with the procedure SWP002 Complaints Procedure (Appendix 8) of the Site Working Procedures Manual.

15. REVIEW OF THE SYSTEM

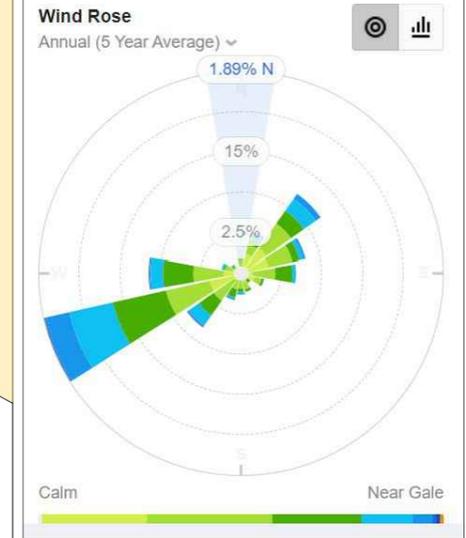
A review of the Environmental Management System shall take place in response to any incidents or accidents and annually on or around the anniversary of the System. The review shall be carried out by site management and the findings recorded. Any defects, shortfalls, or changes to the system shall be recorded and the system amended accordingly.

At each review staff will receive training in the form of toolbox talks to highlight any changes.

APPENDIX 1 – MANAGEMENT STRUCTURE



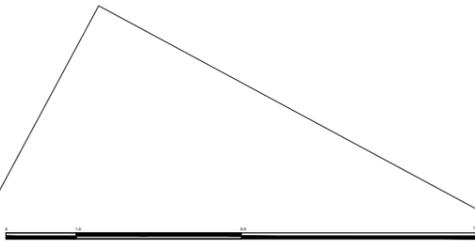
APPENDIX 2 – DRAWING REF: 230718BC104



1. 22 x Dolav Boxes - Storage of Lead Acid Batteries - 19.54m³
2. 21 x Dolav Boxes - Storage for CATS - 18.65m³
3. 16 Bulk Bags - Storage for Wiring Looms - 11.66m³
4. 8 Bulk Bags - Storage for Alloy Wheels - 5.83m³

- Fire Wall
- Fire Extinguisher
- ▲ Auto Fire Extinguisher
- Spill kit
- PPE storage
- Flood sax
- Flood sax storage
- Covered area with concrete surface

Access for Fire Service
Fire Hydrant 119m approx
(see drawing number 230718BC102)



| | | |
|-----|----------|----------------------------------|
| REV | DATE | DETAIL |
| A | 22/01/25 | 40cyd RoRo quarantine skip added |

| | | | |
|--|------------------|----------------------|------------------------|
| CLIENT Blancomet - Cardiff | | | |
| SITE Unit 18C, Freemans Parc, Penarth Road, Cardiff, CF11 8EQ | | | |
| PROJECT Permit Application | | | |
| TITLE Fire Prevention Plan Plan | | | |
| SCALE @A3 1:150 | DATE Jan 2025 | DRAWN BY T Kearns | CHECKED BY D Alcock |
| DRAWING NO 230718BC101 v1 | | REVISION A | |

APPENIX 3- SWP007

Site Working Procedure – Waste Acceptance Procedure for Hazardous & Non-hazardous Waste SWP007

| | | | |
|---------------------|--------------|--------------|----------------|
| Issue: | 1 | Date: | 03/07/2023 |
| Written/Revised By: | Mary Simcock | Approved By: | Edward Manzano |

1. Purpose

- 1.1.1 To ensure that the site complies with planning permission and the environmental permitting regulations.
- 1.2 To ensure the correct segregation & disposal of waste brought onto site in loads that is hazardous waste as defined by the European Waste Catalogue (EWC).
- 1.2 To ensure when waste is produced consideration has been given as to how that waste is to be transported and disposed of, ensuring compliance with Duty of Care.

2. Responsibility

- 2.1. It is the responsibility of the site manager to ensure any waste delivered to site is segregated and disposed of safely, legally and in accordance with the planning permission and environmental permit.

3. Waste Acceptance Procedures

- 3.1. All loads delivered to site shall be inspected by a Site Operative as described in Section 4 below.
- 3.2 Only following inspection shall any load be allowed to be deposited on the ground.
- 3.3 In the event of non-conforming materials being found during inspection this must be reported immediately to the site manager.
- 3.3 Non-conforming materials not covered by the environmental permit or exemptions must be rejected following the “Rejecting Waste Procedure”
- 3.4 Any non-conforming material found after delivery must be quarantined and removed by an appropriate carrier to an appropriate permitted facility.
- 3.5 Ensure appropriate PPE is worn at all times.

4. Inspection and reception of Loads

- 4.1 All vehicles delivering waste to site must have their loads checked in accordance with this Waste Acceptance Procedure. All loads must be physically inspected prior to acceptance.
- 4.2 Any vehicles load found to have non-acceptable waste shall be rejected and the vehicle sent away.
- 4.3 Any non-conforming waste found following tipping shall be segregated from the remainder of the load and kept securely until arrangements for safe and legal disposal can be made
- 4.4 Any hazardous waste found within a load delivered to site which is non-conforming waste must be kept securely in a container, if practical, prior to arrangements being made for safe and legal collection and disposal elsewhere.
- 4.5 All hazardous waste rejected by compliance with this procedure shall on leaving site be accompanied by a hazardous waste consignment note in accordance with this procedure and current legislation.
- 4.6 The system records the following information;
 - Date and time of arrival,
 - Producers details inc. SIC code
 - Haulier's details inc. Waste Carriers Licence,
 - A unique reference number,
 - Type of waste
 - Source of waste (by area)

5. Reporting & Records

- 5.1. Incidents to be noted in the site diary and incident log book in accordance with SWP008 - Incident Log.
- 5.2. Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 4- SWP015

| | | | |
|---|--------------|---------------------|---------------|
| Site Working Procedure – Rejecting Waste | | | |
| SWP015 | | | |
| Issue: | 1 | Date: | 26/07/2023 |
| Written/Revised By: | Mary Simcock | Approved By: | Nerijus Gecas |

1. Purpose

1.1 To ensure the safe, legal and efficient operation of the site, prevent pollution, protect health and fulfill the requirements of the waste management regulations.

2. Responsibility

2.1. It is the responsibility of the site manager to ensure this procedure is implemented & followed.

3. Rejecting Waste

3.1 Waste must be rejected if;

- It is hazardous or non-hazardous waste that is **not** shown in the Environmental Permit
- The waste is not identifiable or is deemed a risk.
- The vehicle / person delivering refuse cannot accurately account for its origin.
- The vehicle / person cannot produce the correct paperwork.
- It is suspected that the person(s) may not have acquired the waste legally.

3.2 The following information must be recorded on the Site Incident Log;

- Record Number – This number must be in sequence
- Date – the actual date for the information being recorded
- Carriers Registration – the registration number of the vehicle delivering the waste
- Reason for rejection – why the decision was made to refuse the waste
- Type of waste – what waste type was trying to be delivered
- Comment – any advice or instruction given

4. Reporting & Records

4.1 Any incidents to be noted in the site diary and incident log book.

4.2.1 Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 5- SWP009

| | | | |
|--|--------------|---------------------|---------------|
| Site Working Procedure – Noise Minimisation | | | |
| SWP009 | | | |
| Issue: | 1 | Date: | 31/07/2023 |
| Written/Revised By: | Mary Simcock | Approved By: | Nerijus Gecas |

1. Purpose

1.1 To ensure a nuisance is not created by operational noise.

2. Responsibility

2.1. It is the responsibility of site manager to ensure this procedure is implemented & followed.

3. Noise Control Measures

3.1 As a result of the Noise survey, certain practices are to be adopted to minimize noise generated by permitted operations. These include fitting closed engine covers to all machinery and using effective silencers and alarms.

3.2 Other measures to be taken are

3.2.1 Vehicles and plant are only to be operated within the site within normal working hours.

3.2.2 Vehicles must switch engines off whilst unloading or waiting to unload.

3.2.3 Suppression to be used on any plant operated in the site to lower noise transmission and to reduce vibration.

4. Reporting & Records

4.1 Incidents of unusual or excessive noise occurring to be noted in the site diary and incident log book.

4.2 Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 6- SWP008

| | | | |
|--|--------------|---------------------|---------------|
| Site Working Procedure – Litter Control | | | |
| SWP008 | | | |
| Issue: | 1 | Date: | 31/07/2023 |
| Written/Revised By: | Mary Simcock | Approved By: | Nerijus Gecas |

1. Purpose

1.1 To ensure a nuisance and / or a legal breach is not created by the escape of light waste (Litter)

2. Responsibility

2.1. It is the responsibility of the site manager to ensure this procedure is followed.

3. Litter Control Measures

3.1 All site personnel to be vigilant and check for litter arising from the site’s operation.

3.2 The following measures are to be implemented:

- In the event of the escape of litter around the site, litter picking operations to be undertaken immediately.
- PPE consisting of boots, gloves, helmet, high visibility vest or coat to be worn by all site personnel undertaking litter-picking operations.

4. Reporting & Records

4.1 Incidents of litter to be noted in the site diary and incident log book.

4.2 Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 7- SWP012

| | | | |
|---------------------------------------|--------------|---------------------|---------------|
| Site Working Procedure – Pests | | | |
| SWP012 | | | |
| Issue: | 1 | Date: | 31/07/2023 |
| Written/Revised By: | Mary Simcock | Approved By: | Nerijus Gecas |

1. Purpose

1.1 To ensure a nuisance is not created and to fulfill the requirements of the environmental permitting regulations.

2. Responsibility

2.1. It is the responsibility of the site manager to ensure this procedure is implemented & followed.

3. Pest Control

3.1 The site is to be inspected for pests as part of the normal inspection regime

3.2 Complaints or reports of problems from neighbours or visitors to be investigated.

3.3 Any evidence of pests to be dealt with by specialist licensed pest control provider.

3.4 Any treatment of vermin or insects shall be in accordance with requirements under the Control of Pesticides Regulations 1986 (COPR -Amended 1997)

4. Reporting & Records

4.1 Incidents of pests causing a problem to be noted in the site diary and incident log book.

4.2 Any incident or breach of this procedure must be reported immediately to the site manager.

APPENDIX 8- SWP002

| | | | |
|--|--------------|---------------------|---------------|
| Site Working Procedure – Complaints Procedure | | | |
| SWP002 | | | |
| Issue: | 1 | Date: | 01/08/2023 |
| Written/Revised By: | Mary Simcock | Approved By: | Nerijus Gecas |

1. Purpose

1.1 To define the process for recording and responding to complaints received by the company.

2. Responsibility

2.1. It is the responsibility of the site manager to ensure this procedure is implemented & followed.

3. Scope

3.1 This procedure covers all formal complaints received concerning the activities and services of the company.

4. Definitions

4.1 Complaint

4.1.1 A documented critical observation or query about the Company’s policies, management system or performance from interested parties, requesting a response or remedial action, or otherwise worthy of a response.

4.1.2 A complaint, verbal or otherwise from an employee regarding any aspect of the company’s operations or their management and to which the employee requires a response and which requires senior management consideration.

5. Responsibilities

5.1 The initial recipient of a complaint is responsible for determining whether the complaint qualifies for treatment under this procedure. In the event of dispute the complainant may refer the matter to the Manager for adjudication.

5.2 The Manager is responsible for maintaining a register of complaints detailing the nature of the complaint and any actions taken to resolve the issues.

5.3 All employees are responsible for contributing to the planned resolution of complaints, in so far as they relate to matters within their control.

6. Procedure

6.1 All complaints will be recorded on the Complaints and Incidents Log Sheet

6.2 The Complainant will be informed of the actions taken, or to be taken, in response to the complaint within 21 days of receipt of the complaint.

6.3 Persistent or unresolved complaints will be dealt with by the Manager