



EPS Materials Recovery Ltd
ENVIRONMENTAL MANAGEMENT SYSTEM

Controlled Document No.	
Issue	1.4
Date:	Jan 2019

Environmental Management System

Metal Recycling Facility

Bespoke Environmental Permit (Permit No. EPR/JB3135RA)

Graigola Wharf

Kings Dock

Swansea

SA1 8QT



EPS Materials Recovery Ltd
ENVIRONMENTAL MANAGEMENT SYSTEM

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Document Revision

Version	Date	Author	Checked / App'd	Revision
DRAFT	11/01/16	SW	AS	FOR APPROVAL
1.0	22/01/16	SW	AS	RELEASE VERSION FOR REVIEW BY NRW
1.1	19/02/16	SW	AS	MSP AND SITE DRAWINGS UPDATED FOLLOWING NRW FEEDBACK
1.2	01/09/16	SW	AS	UPDATE FOLLOWING PERMIT VARIATION
1.3	Jan 2019	SW / AE	AS	Review EMS
1.4	January 2019	Geo / AE		Update EMS to include procedures for 19 12 12 acceptance and processing



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This Management System Plan has been prepared by EPS Materials Recovery Ltd and is a component of a suite of documents that form the company's Environmental Management System (EMS) for managing recycling activities at the facility known as EPS Materials Recovery Limited, Kings Dock, Swansea, SA1 8QT.

This EMS describes the processes and operations undertaken at the facility, how they are managed and controlled to meet the requirements of the Environmental Permit. This is a 'live' document requiring update and review.

This latest update, version 1.4, is intended to reflect the proposed acceptance of waste coded 19 12 12. Such wastes would be processed indoors in a steel clad building with sealed drainage. The principle aim of the operation is to recover metals (ferrous and non-ferrous) from the waste stream. Residual wastes would be despatched off-site for recovery. An annual throughput of approximately 12,000 tonnes is anticipated but such tonnages will take time to achieve and in the short term some 6,000 tonnes per annum is expected. The measures included in this EMS for managing this waste stream are underpinned by a separate risk assessment (see Updated Risk Assessment Report, Report Number 1815r1v2d1018).



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MPP2 Environmental Impacts and Controls	3 rd September 2018	2 nd September 2019
MPP3 Environmental Management System Plan	3 rd September 2018	2 nd September 2019
MPP4 Accident/Pollution Incident Plan	3 rd September 2018	2 nd September 2019
A – Site Plan	3 rd September 2018	2 nd September 2019
B – Key Site and Emergency Contacts	3 rd September 2018	2 nd September 2019
C – List of Substances and Storage Facilities	3 rd September 2018	2 nd September 2019
D – Preventing Accidents and what to do if they happen	3 rd September 2018	2 nd September 2019
MPP5 Site Drawings and Plans	3 rd September 2018	2 nd September 2019
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Procedures	Last Review Date	Next Review (Latest)
PR1 - Accident/Pollution Incident Procedure	3 rd September 2018	2 nd September 2019
PR2 - Emergency Incidence Procedure – Fire & Explosion	3 rd September 2018	2 nd September 2019
PR3 - Emergency Incidence Procedure – Spillage	3 rd September 2018	2 nd September 2019
PR4 - Emergency Incidence Procedure – Flood	3 rd September 2018	2 nd September 2019
PR5 - Emergency Incidence Procedure – Air Emissions	3 rd September 2018	2 nd September 2019
PR6 - Emergency Incidence Procedure – Discovery of Suspicious Items	3 rd September 2018 3 rd September 2018	2 nd September 2019
PR7 – Waste Acceptance Procedure	3 rd September 2018	2 nd September 2019
PR8 - Procedure for Assessment and Implementation of Training Needs, Competence and Awareness	3 rd September 2018 3 rd September 2018	2 nd September 2019 2 nd September 2019
PR9 – Maintenance Procedure	3 rd September 2018	2 nd September 2019
PR10 – Procedure for Recording of Staff Responsibilities	3 rd September 2018	2 nd September 2019
PR11 – Procedure for Recording and Reporting of Environmental Incidents	3 rd September 2018 3 rd September 2018	2 nd September 2019 2 nd September 2019
PR12 – Complaints Procedure	3 rd September 2018	2 nd September 2019

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Forms and Records	Last Review Date	Next Review (Latest)
FR1 Site Inspection Record	4 th September 2017	2 nd September 2019
FR2 Complaint Record	3 rd September 2018	2 nd September 2019
FR3 Plant and Equipment Inventory	3 rd September 2018	2 nd September 2019
FR4 Maintenance, Service, Calibration Schedule	3 rd September 2018	2 nd September 2019
FR5 Maintenance Record	3 rd September 2018	2 nd September 2019
FR6 Training Checklist (Employee Competency Matrix)	3 rd September 2018	2 nd September 2019
FR7 Training Record	3 rd September 2018	2 nd September 2019
FR8 Roles and Responsibilities	3 rd September 2018	2 nd September 2019
FR9 Environmental Accident (and Incident) Record	3 rd September 2018	2 nd September 2019
FR10 Corrective Action Request	3 rd September 2018	2 nd September 2019
FR11 Register of Waste Facilities	3 rd September 2018	2 nd September 2019
FR12 Register of Legal and Other Requirements	3 rd September 2018	2 nd September 2019

Rules and Other Information	Last Review Date	Next Review (Latest)
ROI1 Site Rules	3 rd September 2018	2 nd September 2019
ROI2 Further Help	3 rd September 2018	2 nd September 2019
ROI3 Protecting the Environment	3 rd September 2018	2 nd September 2019

Risk Assessments	Last Review Date	Next Review (Latest)
RA1 Register of Risk Assessments	3 rd September 2018	2 nd September 2019
RA2 Environmental Risk Assessments	3 rd September 2018	2 nd September 2019



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Section Contents

Manuals, Policies and Plans

MPP1 Environmental Policy

MPP2 Environmental Impacts and Controls

MPP3 Environmental Management System Plan

MPP4 Accident/Pollution Incident Plan

A – Site Plan

B – Key Site and Emergency Contacts

C – List of Substances and Storage Facilities

D – Preventing Accidents and what to do if they happen

MPP5 Site Drawings and Plans

Drawing 10934-000-A Site Location and Surroundings

Drawing 10934-000-B Permitted Area

Drawing 10934-000-C Block Plan

Drawing 10934-000-D Drainage Plan

Drawing 10934-000-E Storage Plan

Drawing 10934-000-F Services Plan

Drawing 10934-000-G Receptor Plan

Drawing 10934-000-H Emergency Plan

Drawing 10934-000-I Process Flowchart



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MPP1 Environmental Policy



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MPP1 Environmental Policy

EPS Materials Recovery Ltd is one of the leading independent companies in the market sector of waste transfer and recycling. This statement recognises EPS Materials Recovery Ltd.'s commitment to the environment, continual improvement and the prevention of pollution.

The company is committed to:

Maintain an Environmental Management System, which provides the framework for setting and reviewing our Environmental Policy, Objectives and Targets and for monitoring and continually improving environmental performance.

Meet and where appropriate exceed the requirements of relevant legislation, regulations, and other requirements.

Implement procedures to detect and where possible prevent pollution through accidental emissions and effluent discharges.

Monitor environmental aspects and apply appropriate control measures.

Working with clients, sub-contractors, customers and third parties to minimise any environmental impact from day to day operations.

Providing appropriate environmental training to its employees and communicating environmental issues to all employees on a regular basis.

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

This Policy will be reviewed no later than 12 months from the date below.

Signed For and on behalf of the Board of Directors

Adrian Stewart

Managing Director

Date: 3rd September 2018



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MPP2 Environmental Impacts Plan and Controls



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Table 1

Site Activity:

The key pieces of environmental legislation affecting this sector are:

(Add as many as apply to your site activities – you should ensure that this list is kept up to date for your site and covers all applicable legislation)

- The Waste (England and Wales) Regulations 2011 (as amended by The Waste (England and Wales) (Amendment) Regulations 2012).
- Environmental Protection Act 1990
- Environmental Permitting (England and Wales) Regulations 2010 (SI 2010 No 675) (as amended by Explanatory Memorandum to Environmental Permitting (England and Wales) Regulations 2010, Environmental Permitting (England and Wales) (Amendment) Regulations 2010 (SI 2010 No 676), Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2010 (SI 2010 No 2172), Environmental Permitting (England and Wales) (Amendment) Regulations 2011 (SI 2011 No 2043),

- Environmental Permitting (England and Wales) (Amendment) (No 2) Regulations 2011 (SI 2011 No 2933), Environmental Permitting (England and Wales) (Amendment) Regulations 2013 (SI2013 No 390)
- Clean Neighbourhoods and Environment Act 2005
 - Groundwater regulations 1998, SI 2746
 - Water Resources Act 1991, as amended
 - Hazardous Waste (England and Wales) Regulations 2005 as amended by Hazardous Waste (England and Wales) (Amendment) Regulations 2009)

REFER TO FR12 REGISTER OF LEGAL AND OTHER REQUIREMENTS FOR OTHER POTENTIALLY APPLICABLE LEGISLATION AND GUIDANCE

Process / Activity/Equipment	A	E	W	D	N	R	L	Process / Activity/Equipment	A	E	W	D	N	R	L
Sorting	L	L	M	L	L	L	M	Grading	L	L	L	L	L	L	L
Baling	M	M	M	L	M	L	M	Storage	L	L	M	L	M	L	M
Bulking	L	L	M	L	M	L	M	End disposal	L	L	L	H	L	L	L
Compacting	L	M	M	L	M	L	M	Surface water drainage	L	L	M	L	L	L	M
Crushing	L	M	M	L	M	L	M	Vehicle and plant usage	M	M	M	L	H	M	M
Cutting	M	M	M	L	M	L	M	General business operations	M	M	L	M	L	M	L
Grinding	H	M	M	L	H	L	M								
Shearing	L	M	M	L	M	L	M								
Shredding	M	M	M	L	H	L	M								

Processes / Activities / Equipment at your site:
(H) high impact, or (M) medium impact, or (L) low impact in the box next to the process / activity / equipment if it can result in an environmental impact listed below under normal or abnormal operation.

- Emissions to Air (including dust) - **A**
- Energy Usage (e.g. electricity, gas, oil) - **E**
- Emissions to Water - **W**
- Waste Disposal - **D**
- Nuisance (i.e. noise or odour) - **N**
- Resource Consumption (e.g. water, chemicals, not energy) – **R**
- Land Contamination - **L**



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Table 2A. Emissions to Air [A]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Dust from baling, cutting, grinding, shredding	Potential for local air quality issues from dust. Also, a cause for complaints	No – fugitive emission from machinery movement	Yes	Yes – PR7/PR1	Yes – see training list	Waste acceptance procedure controls the presence of dust generating materials. Dust from baling minimal.
Air emissions from vehicle usage	Emissions of greenhouse gases	Yes	Yes	No	N/A	Manufacturer's standard equipment to meet EU engine emission controls. Vehicles maintained to ensure efficiency. Staff trained to consider impact of journeys, reducing mileage by journey planning, etc.



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Table 2B. Energy Usage [E]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Electricity usage for baling, cutting, grinding, shredding	The impacts associated with electricity production are well documented (e.g. air emissions from fossil fuels).	No	Not Applicable	No	N/A	Energy usage minimised by selecting low energy equipment where possible.
Fuel consumption by vehicles and plant	Use of finite natural resources. Greenhouse gas emissions from consumption of fossil fuels.	Yes	Yes	No	N/A	Engine emissions controlled by manufacturer to EU standards. Vehicles maintained to ensure efficiency. Journey planning for collections/ deliveries.
Energy consumption by general operations e.g. electricity usage in offices, business travel, etc.	The impacts associated with electricity production are well documented (e.g. air emissions from fossil fuels). Use of finite natural resources. Greenhouse gas emissions from consumption of fossil fuels.	Yes – in part	Yes – PR9	No	N/A	Energy usage minimised by selecting low energy equipment where possible. Engine emissions controlled by manufacturer to EU standards. Vehicles maintained to ensure efficiency. Staff trained to consider impact of journeys, reducing mileage by journey planning, car sharing, etc.



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Table 2C. Emissions to Water [W]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Leaks and spills during processing or storage from: Vehicles ELV shells (not correctly depolluted) Engine blocks (not correctly depolluted)	Under normal conditions surface water run-off should be uncontaminated. However, if contamination occurs by accident, non-hazardous and hazardous liquids such as fuel, oils, etc. could spill or leak and enter drains with the potential to cause water pollution to coastal waters via run off to surface water drains.	Yes – Containment systems, spill kits, interceptors	Yes – see maintenance checklist	Yes – PR3/PR1/PR9	Yes – see training list	Storage in specific areas. Hazardous waste containers and tanks are banded to mitigate against leaks and are checked as part of the daily inspection. Storage in accordance with EMS Plan. Spill kits used (see below). Accidental contamination is considered in Accident / Incident Management Plan.
Surface Water Drainage	Surface water run-off from buildings, car parks and concrete hard standing. Surface water passes through interceptors before discharge.	Yes Interceptor operation	Yes – see maintenance checklist	Yes – PR1/PR1/PR9	Yes – see training list	Maintenance checklist to ensure continued effectiveness of drainage systems. Daily inspection of site drainage to confirm free from blockages. Accidental contamination is considered in Accident / Incident Management Plan.



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Table 2D. Waste Disposal [D]

Process / Activity / Equipment on Site	Potential Impact		Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Disposal of hazardous waste from sorting	Uncontrolled/illegal disposal leading to environmental pollution.		No	No	No	N/A	Hazardous waste controls/storage in accordance with EMS Plan. Chemicals, waste oils, fuels, etc. all handled in accordance with Hazardous Waste Legislation. Need to meet legal Duty of Care requirements. Disposal to licensed waste facilities only. Checks in place before transfer of waste. Waste hierarchy followed. Recovery chosen before landfill wherever possible.
Disposal of general non-recyclable waste from sorting (or general office activities)	Non-recyclable waste disposal has associated impacts e.g. ecotoxicity, global warming and nuisance e.g. odour.		No	Not applicable	No	N/A	Waste controls/storage in accordance with EMS Plan. Need to meet legal Duty of Care requirements. Disposal to licensed waste facilities only. Checks in place before transfer of waste. Waste hierarchy followed. Recovery chosen before landfill wherever possible. Skips and bins are labelled and staff are trained in the importance of separating and recycling as much of the waste on site as possible.



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Table 2E. Nuisance (e.g. Noise, Odour) [N]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Noise from baling, compacting, crushing, cutting, grinding, shearing shredding, vehicle and plant usage	Section III of the Environmental Protection Act 1990, noise can be classified as a statutory nuisance.	No	Not applicable	Yes – PR1	Yes – see training list	Site remote from non-industrial receptors. Industrial receptors also noise generating. Hours restricted.
Odour from waste storage or site operations e.g. refuelling, etc.	Section III of the Environmental Protection Act 1990, odour can be classified as a statutory nuisance.	No	Not applicable	Yes – PR1	Yes – see training list	Quantities potentially released are small. Odours not overly offensive compared with other wastes e.g. degrading food waste. Adequate ventilation used to disperse odour.
Litter from storage of non-recyclable waste	Air blown litter can cause a nuisance to nearby receptors.	No	Not applicable	Yes – PR1	Yes – see training list	Wastes not generally prone to becoming airborne/litter forming. Light wastes stored in containers. Site inspection and litter picking on a daily basis.
Odour from general site waste	Section III of the Environmental Protection Act 1990, odour can be classified as a statutory nuisance.	No	Not applicable	Yes – PR1	Yes – see training list	Management of waste in accordance with EMS Plan. Odour causing waste limited in quantity and generated from offices/staff welfare. Staff informed of importance of maintaining cleanliness of welfare area during induction training. General measures taken to reduce odour: good housekeeping, regular disposal of waste, etc.



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Table 2F. Resource Consumption (not energy) [R]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Use of chemicals	Harm to human health or escape to the local environment.	No	No	No	N/A	Management of hazardous substances according to COSHH and Hazardous Waste Regulations. Induction training, operating procedures and toolbox talks used to inform staff.
Use of water	Inefficient use results in natural resource depletion.	No	No	No	N/A	Staff informed of importance of resource efficiency during induction training and toolbox talks. General measures taken to reduce water usage e.g. turning taps off when not in use, reduced flush toilets, etc.
Use of fuel (vehicles and plant)	Inefficient use results in fossil fuel depletion and air emissions (see 2A).	No	No	No	N/A	Staff informed of importance of resource efficiency during induction training and toolbox talks. Vehicles maintained to ensure efficiency. Staff trained to consider impact of journeys, reducing mileage by journey planning, etc. Plant/vehicles replaced with more efficient equipment wherever practical.



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Table 2G. Land Contamination (e.g. storage of hazardous substances) [L]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Storage or spills of hazardous substances e.g. fuel, oil, batteries, etc.	Substances can cause harm to the ecotoxicity of the soil, and could leak into surface water or groundwater.	Yes –containment - drip trays, bunds, etc.	Yes – see maintenance checklist	Yes – PR3/PR1/PR9	Yes –see training list	Hazardous material stored in a bunded, impermeable area. Waste stored in appropriate containers and on correct surfaces in accordance with EMS Plan. Drip trays and other containment used. Spill kits available.



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Table 3. General Waste Management

Waste Produced at Site (<i>with EWC, if known</i>)	Where does the waste go?	Can it go to recovery / recycling?	Is it being stored correctly on site?	Are Duty of Care requirements being met?	Comments
Waste Metal (02 01 10)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Ferrous metal filings and turnings (12 01 01)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Non-ferrous metal filings and turnings (12 01 03)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Metallic packaging (15 01 04)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
End-of-life vehicles containing neither liquids nor other hazardous components (16 01 06)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Ferrous metal (16 01 17)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Non-ferrous metal (16 01 18)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Discarded components not otherwise specified (16 01 22)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Lead batteries (16 06 01*)	Recovery	Yes	Yes	Yes	
Copper, bronze, brass (17 04 01)	Reprocessing	Yes	Yes	Yes	
Aluminium (17 04 02)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Lead (17 04 03)	Reprocessing	Yes	Yes	Yes	
Zinc (17 04 04)	Reprocessing	Yes	Yes	Yes	
Iron and steel (17 04 05)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Tin (17 04 06)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	



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Mixed metals (17 04 07)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Cables other than those mentioned in 17 04 10 (17 04 11)	Reprocessing	Yes	Yes	Yes	
Ferrous materials removed from bottom ash (19 01 02)	Reprocessing	Yes	Yes	Yes	
Iron and steel waste (19 10 01)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Non-ferrous waste (19 10 02)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Ferrous metal (19 12 02)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Non-ferrous metal (19 12 03)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries (consisting of lead batteries only) (20 01 33*)	Recovery	Yes	Yes	Yes	
Metals (20 01 40)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
General waste (20 03 01)	Recovery	Yes	Yes	Yes	



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Table 4. List of Procedures (list procedures identified in Table 2A to 2G above, and any other procedures you have in addition)

Procedure Name	What process / activity / equipment does it relate to?	Where is the procedure kept?	Version Number	When was the procedure last reviewed?	Comments
PR1 - Accident/Pollution Incident Procedure	Accident/Pollution Incidents arising from any activity	Site office – control room file cabinet	1.0	22nd January 2016	
PR2 - Emergency Incidence Procedure – Fire & Explosion	Fire or explosion arising from any activity	Site office – control room file cabinet	1.0	22nd January 2016	
PR3 - Emergency Incidence Procedure – Spillage	Spillage arising from any activity	Site office – control room file cabinet	1.0	22nd January 2016	
PR4 - Emergency Incidence Procedure – Flood	Flood incident	Site office – control room file cabinet	1.0	22nd January 2016	
PR5 - Emergency Incidence Procedure – Air Emissions	Emissions arising from any activity	Site office – control room file cabinet	1.0	22nd January 2016	
PR6 - Emergency Incidence Procedure – Discovery of Suspicious Items	Discovery of suspicious item during inspection and acceptance, or site inspections	Site office – control room file cabinet	1.0	22nd January 2016	
PR7 – Waste Acceptance Procedure	Acceptance of waste at the facility	Site office – control room file cabinet	1.0	22nd January 2016	
PR8 - Procedure for Assessment and Implementation of Training Needs, Competence and Awareness	Assessment of staff training needs and provision of training.	Site office – control room file cabinet	1.0	22nd January 2016	
PR9 – Maintenance Procedure	All sire infrastructure including that used for processing and site drainage.	Site office – control room file cabinet	1.0	22nd January 2016	
PR10 – Procedure for Recording of Staff Responsibilities	Recording of staff responsibilities	Site office – control room file cabinet	1.0	22nd January 2016	
PR11 – Procedure for Recording and Reporting of Environmental Incidents	Recording and reporting of environmental incidents	Site office – control room file cabinet	1.0	22nd January 2016	
PR12 – Complaints Procedure	Recording, responsibilities and actions for dealing with complaints	Site office – control room file cabinet	1.0	22nd January 2016	



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MPP3 Environmental Management System Plan



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MPP3 Environmental Management System Plan

Metal Recycling Facility

Bespoke Environmental Permit

PERMIT NUMBER EPR/JB3135RA/T001

Kings Dock

Swansea

SA1 8QT



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1 INTRODUCTION

1.1 Purpose of this Document

This Management System Plan has been prepared by EPS Materials Recovery Ltd and is a component of a suite of documents that form the company's Environmental Management System for managing recycling activities at the facility known as EPS Materials Recovery Limited, Kings Dock, Swansea, SA1 8QT.

The Environmental Management System fulfils the requirements of the site's Environmental Permit by "providing a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints". It describes the processes and operations undertaken at the facility, how they are managed and controlled to meet the requirements of the Environmental Permit and any associated best practices and guidance. In addition it provides systems and procedures to enable the company to operate in accordance with its Environmental Policy (**MPP1**).

This Management System Plan is considered a 'live' document and as such has been presented in a way which can be easily amended by adding to, or removing superseded information. Each change to the plan will be subject to Natural Resources Wales approval prior to insertion in the document. The plan presents the general engineering details of the site, along with proposed working arrangements, infrastructure, environmental controls, monitoring and site management procedures.

Reference is made throughout this document to processes and procedures within the EMS and in particular to a Corrective Action Response (CAR) Procedure which details how the company will deal with any deficiencies identified during a scheduled or unscheduled system audit/check or justified customer/resident/staff complaint. Where critical activities have been identified, the company has reviewed the processes and procedures that are in place with a view to meeting, and preferably exceeding any statutory obligations placed on them. Where current measures are deemed insufficient, the company will identify additional controls such as the introduction of documented procedures and work instructions, further training programmes and infrastructure improvements.

Within this EMS Plan, text highlighted in **Bold Blue** refers to documents that form part of the EMS.

1.2 Overview

This EMS was originally prepared to support the submission of an application to Natural Resources Wales to vary the existing Standard Rules Environmental Permit (Ref: EPR/JB3135RA/T001) to a bespoke environmental permit. The application increased the area of the currently permitted site and was accompanied by the surrender of Standard Rules Environmental Permit EPR/HB3932RS/A001 for the directly adjacent Wood Export Facility and the consolidation of a T9 Exemption (Ref: EPR/AF0132VC/A001) for the recovery of scrap metal. The application was accepted by NRW and a bespoke Environmental Permit (Permit No. EPR/JB3135RA) issued on 5 September 2016.

This document considers the operation of the metal recycling facility and now the processing of waste coded 19 12 12 in compliance with the requirements of the bespoke Environmental Permit which is essentially based on Standard Rules set SR2008No21, with bespoke elements relating to location (<500m from a designated site) and drainage (discharge to coastal waters as opposed to foul sewer or sump).

Operations permitted at the site include the receipt, inspection and storage of waste ferrous and non-ferrous metal, sorting, separation, grading, shredding, metal removal via magnets, compacting, crushing, granulating, cutting, shearing, bulking up and baling for recovery. Some of these processes will be used to treat the 19 12 12.

The currently permitted operations may be observed as:

Receipt, inspection and unloading of waste metal from transporter vehicles and transfer to storage using on-site plant;

Cutting, grinding and shearing of waste metal to reduce its size;



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Baling of waste metal to facilitate transport to recycling facilities;

Loading and transfer of baled or loose metals into articulated or hooklift vehicles for dispatch to recycling facilities for recovery; and

Loading and transfer of small volumes of residual waste into hooklift vehicles for dispatch to recycling facilities for recovery/disposal.

Waste operations are performed principally within designated areas within the large yard, or within site buildings (see drawings in the appendices) as appropriate.

Waste coded 19 12 12 will be accepted, stored and treated inside a building with impermeable surfacing and sealed drainage. Treatment will primarily involve mechanical and magnetic sorting of the incoming waste stream to enable the recovery of ferrous and non-ferrous fractions. All other waste fractions will be temporarily stored in a trailer prior to despatch off-site for recovery as Refuse Derived Fuel (RDF). The overall process is summarised in **Figure X**.

To comply with the terms of the standard permit the following conditions should be met:

Uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal wastes should be stored on hardstanding or an impermeable surface.

All other wastes should be stored on an impermeable surface with sealed drainage system. All wastes should be treated on an impermeable surface with sealed drainage system.

Lead acid batteries are stored in containers with an impermeable, acid resistant base and a cover to prevent ingress of water.

Waste coded as 19 12 12 must be stored and treated within a building, upon an impermeable surface

Site areas not serviced by a sealed drainage system currently drain by infiltration. Proposals to improve the site's existing drainage by directing rainfall dependent surface run-off (which accumulates at the perimeter of the site) via drainage ditches and kerbs to two class 1 full retention interceptors to be located at the western end of the site are being prepared, informed by ongoing monitoring. This new drainage scheme (which is subject to detailed design following the conclusion of the aforementioned sampling of surface water run-off) as well as changes to surfaces used for treatment of waste are proposed in section 6.2.3. Once finalised, this EMS Plan will be updated to reflect any revisions to the drainage scheme and implemented to a schedule to be agreed with NRW.

The Operator will implement further measures necessary to ensure its future compliance with any conditions of a bespoke permit granted by NRW.

1.4 Compliance with Permit Requirements

Table 1 summarises the key requirements of the site's Environmental Permit and the sections of this EMS Plan or associated procedures that, when effectively implemented, will enable the site to comply with these requirements.

Licence Condition	Description	System Reference or Evidence of Compliance
1.1.1	General management	(a) Environmental Management system (b) Procedure PR8 and TCM Attendance
1.1.2	Records demonstrating compliance	Site Diary Archived Forms FR1 - FR11 Compliance Audits (Internal/External)
1.1.3	Permit copy	Copy on Staff Notice Board and in Weighbridge Office
1.1.4	Competence scheme	Procedure PR8 and copies of TCM qualifications



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1.2.1	Waste hierarchy	(a) and (b) Environmental Policy and EMS Plan 7.4 (c) EMS Plan 7.4
1.2.2	Review	EMS Plan 1.4
2.1.1	Permitted activities	EMS Plan 4.1 Compliance Audits (Internal/External)
2.2.1	Waste acceptance	EMS Plan 4.1
2.3.1	Operating techniques	EMS Plan 6.1
2.4.1	Site boundary	Drawing 10934-000-B in MPP5 Daily site inspections Compliance Audits (Internal/External)
2.4.2	Designated sites	EMS Plan 3.4
2.5.1	Technical Requirements	EMS Plan 7.6.3
3.1.1/3.1.2	Emissions	EMS Plan 8.1.2
3.1.3	Containment	EMS Plan 6.1/6.2/8.1.2.3
3.2.1/3.2.2	Odour	EMS Plan 8.1.2.10
3.3.1/3.3.2	Noise and Vibration	EMS Plan 8.1.2.4
4.1.1	Record keeping	EMS Plan 7.9/9
4.1.2	Maintaining records	EMS Plan 9
4.2.1/4.2.2	Reporting	EMS Plan 8.3
4.3.1/4.3.2	Notifications	EMS Plan 8.3.2
4.3.3	Monitoring or sampling	EMS Plan 8.1.1.2
4.3.4	Notifications	EMS Plan 8.3.2
4.4	Interpretation	EMS Plan 8.3.3

Table 1. Requirements of Permit

1.4 EMS Review

The Environmental Management System (including this EMS Plan) shall be reviewed annually to confirm whether changes are required to system and procedures.

1.5 Regulations and Guidance

Various guidance documents and statutory instruments have been used to produce this plan. These documents include:

- Environmental Permitting (England and Wales) Regulations 2010
- Environmental Permitting (England and Wales) (Amendment) Regulations 2010
- Environmental Permitting (England and Wales) (Amendment) Regulations 2010 (No. 2)

Environmental Permitting (England and Wales) (Amendment) Regulations 2011

- Environmental Permitting (England and Wales) (Amendment) (No 2) Regulations 2011
- Environmental Permitting (England and Wales) (Amendment) Regulations 2013
- Industrial Emissions (Integrated Pollution Prevention and Control) (Recast) 2010
- Environmental Permitting Guidance The IPPC Directive Part A(1) Installations and Part A(1) Mobile Plant, v3 March 2010
- Environment Protection Act 1990
- Clean Neighbourhoods and Environment Act 2005



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- Groundwater regulations 1998, SI 2746
- Water Resources Act 1991, as amended
- Hazardous Waste (England and Wales) Regulations 2005 as amended by Hazardous Waste (England and Wales) (Amendment) Regulations 2009)
- Environmental Permitting Guidance -Core Guidance for the Environmental Permitting (England and Wales) Regulations 2010 – March 2013
- Getting The Basics Right – How to comply with your environmental permit June 2013
- Horizontal Guidance Note H1 Environmental Risk Assessments for Permits - Overview Document, v2.1 December 2011 and Annexes A to K.
- Horizontal Guidance Note H3 Part 2 - Noise Assessment and Control, v3 June 2004
- Horizontal Guidance Note H4 Odour Management, March 2011
- Horizontal Guidance - H6 Environmental Management Systems

Elements of this working plan also consider guidance from the following historic documents:

- Working Plan Guidance and Specification, Volume 1, 19 February 2000



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2 PERMIT DETAILS AND CONTACTS

2.1 Environmental Permit Number

EPR/JB3135RA

2.2 Site Operator

The site Operator is:

EPS Materials Recovery Limited

Kings Dock

Swansea

BS11 0YB

Tel.: 01792 646985

Fax: 01792 470832

Email: Info@epswales.co.uk

2.3 Site Contacts

Company Director: Mr Richard Phillips

Mobile: 07836 337899

Email: mrj@epsmr.co.uk

Company Director: Mr Adrian Stewart

Mobile: 07774 903373

Email: adrian.stewart@epswales.co.uk

Technically Competent Person: Mr Adrian Stewart

Mobile: 07774 903373

Email: adrian.stewart@epswales.co.uk

Site Manager: Darren Stillman

Mobile: 07527 325336

Email: darren.stillman@epsmr.co.uk

Landowner: Associated British Ports

Tel: 0870 609 6699



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3 SITE DETAILS

3.1 Site Location

The facility is located on Kings Dock, a central location within Swansea Docks located approximately 2.6km east of Swansea city centre (OS Grid Reference SS 68161 92675). The location of the site is shown on Drawing 10934- 000-A in [MPP5](#).

3.2 Site Access

Access to the site is via an entrance off Baldwins Crescent, which connects via the A483 Fabian Way to the M4 at junction 42 (approximately 3.5km to the east).

3.3 Site Layout

The permitted area is shown in Drawing 10934-000-B in [MPP5](#).

The site occupies an area of ~3.1 hectares (~7.7 acres) and comprises a large open yard enclosed on the southern side by a 1.5-2m high bund and the dock to the north. A block plan for the site is shown in Drawing 10934-000- C in [MPP5](#). The layout (describing the site in an approximate east to west direction) comprises the following primary areas for metal waste management:

Two weighbridges for ingress and egress from the site;

A single storey building incorporating the Weighbridge Office, administrative offices and staff welfare facilities (including kitchen and toilet facilities);

An area for storage, processing and bulking of non-ferrous metals which includes:

- o A building for reception, inspection, processing and storage of non-ferrous wastes;
- o Designated external storage areas for bagged/containerised non-ferrous wastes awaiting dispatch;
- o Areas for equipment storage.

An area for storage, processing and bulking of ferrous metals occupying the majority of the remainder of the site which includes:

- o An area for the reception and inspection of non-ferrous wastes;
- o Designated storage areas for accepted waste awaiting processing;
- o Areas for the processing of ferrous waste by cutting, grinding, shearing and baling; and o Designated storage areas for ferrous wastes awaiting dispatch.

A quarantine area and area for storage of hazardous wastes; and A storage area for non-hazardous waste residual waste. For the handling and treatment of waste coded 19 12 12 a steel portal and steel clad building will be constructed. This will provide sufficient temporary storage capacity for all 19 12 12 waste delivered and the residual waste (non-metallic) generated during processing. All storage and treatment will occur on an impermeable surface with sealed drainage. All areas of the building will also be provided with a manual sprinkler system to be used for fires and / or dust suppression. Prior to the processing of 19 12 12 wastes the equipment will be used to process metal wastes already listed on the Permit.

3.4 Sensitive Receptors

The site is located east of Swansea city centre in an area that has been developed extensively for dockside commercial and industrial use. Industrial or commercial premises represent the site's immediate neighbours.

The nearest residential housing is situated in Port Tennant approximately 430m north of the site.



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Other sensitive receptors within 2 km of the site include a mussel farm located in Queen's dock 220m to the south west (and connected to King's Dock via Scherzer Passage 700m west of the site), Crymlyn Bog a designated SSSI, SAC and Ramsar (398m north), Crymlyn Burrows SSSI (1.97km east) and Crymlyn Bog and Pant y Sais NNR (1.19km north).

In terms of flood risk, the eastern area of the site (offices and non-ferrous storage/processing area) are categorised as lying in a Flood Zone 3 area, with a patchwork of Flood Zone 2 and 3 areas covering the west of the site (ferrous storage and processing area).

- Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year
- Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year

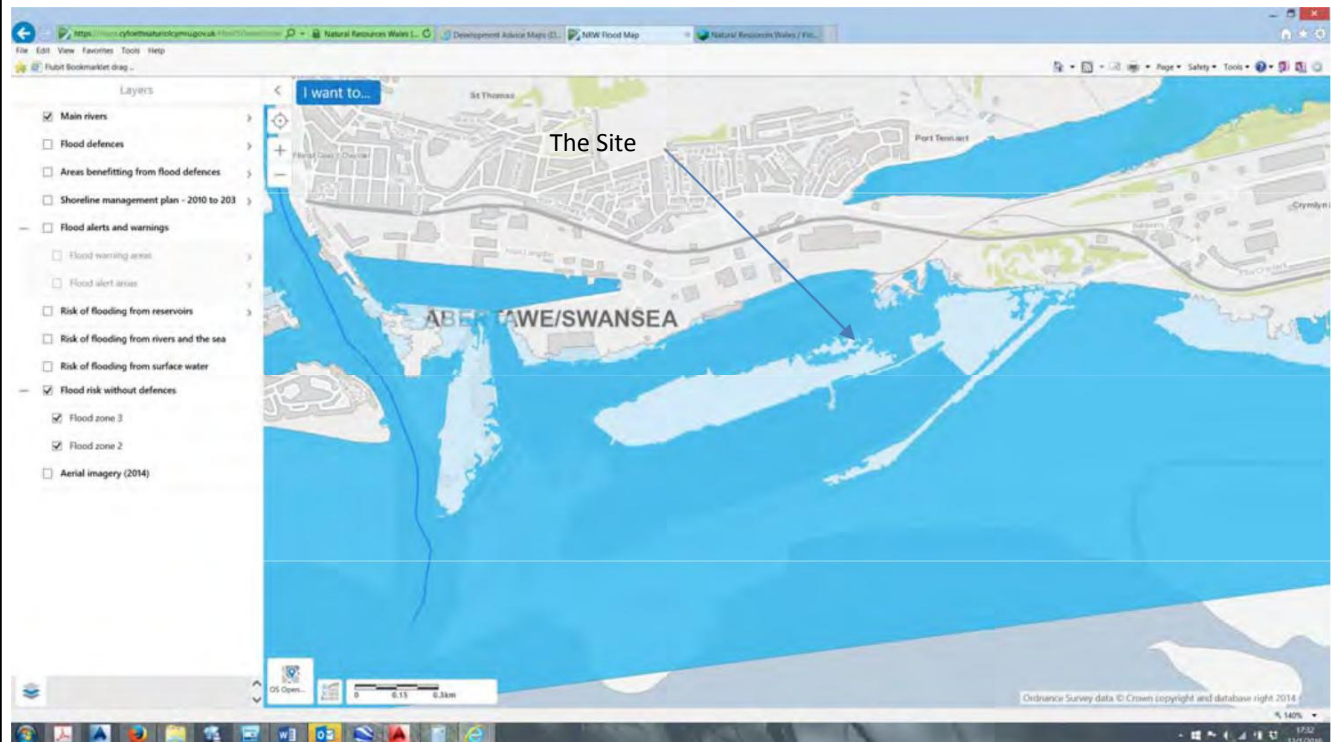


Figure 1. Flood Zones

According to NRW's web site the site does not lie in a Groundwater Protection Zone or Groundwater Vulnerability Zone, nor is it underlain by any designation of aquifer.



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4 PERMITTED OPERATIONS, PERSONNEL AND TRAINING

4.1 Specified Operations

The site has been developed as a metal recycling facility. The site operations are designed for the purposes of recycling all ferrous and non-ferrous scrap metal delivered into the facility by licensed waste carriers (including our own vehicles).

Any Waste Activities not indicated in the site's permit should not be undertaken without consultation with the Site Manager and Natural Resources Wales as required.

For the purposes of the permit, the specified waste operations are classified within the following sections.

4.1.1 Metal Recycling Facility

The company operates a Metal Recycling Facility for the recovery (including storage) of ferrous and non-ferrous scrap metal.

The total quantity of waste that can be accepted at the site under these rules must be less than 75,000 tonnes per year. Burning of any wastes, either in the open, inside buildings or in any form of incinerator is not permitted.

Point source emissions into surface waters or groundwater are not permitted. However, under the emissions of substances not controlled by emission limits rule:

- liquids may be discharged into a sewer subject to a consent issued by the local water company;
- liquids may be taken off-site in a tanker for disposal or recovery; and
- clean surface water from roofs, or from areas of the site that are not being used in connection with storing and treating waste, may be discharged directly to surface waters, or to groundwater by seepage through the soil via a soakaway.

Vehicle storage, depollution and dismantling (authorised treatment) facility

Description of Activities	Limits of Activities
R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) R4 Recycling/reclamation of metals and metal compounds	Treatment consisting only of sorting, separation, grading, shearing, shredding, baling, compacting, crushing, granulating and cutting of ferrous metals or alloys and non-ferrous metals into different components for recovery. There shall be no treatment of lead acid batteries. Wastes shall be stored for no longer than 3 years prior to recovery.

Table 2 Waste management operations to be undertaken

The waste categories to be imported into the facility are contained in the European Waste Catalogue and are listed below:

NOTE: Any waste whose six digit code is marked with an asterisk (*) is a hazardous waste.



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Exclusions:

Wastes having any of the following characteristics shall not be accepted;

Consisting solely or mainly of dusts, powders or loose fibres; and

Wastes that are in a form which is either sludge or liquid.

2	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10	waste metal
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 03	non-ferrous metal filings and turnings
15	WASTE PACKAGING, ABSORBENTS, FILTER MATERIALS, WIPING CLOTHS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 04	metallic packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	discarded components not otherwise specified
16 06	batteries and accumulators
16 06 01*	lead batteries
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 01	wastes from incineration or pyrolysis of waste



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19 01 02	ferrous materials removed from bottom ash
19 10	from shredding of metal-containing wastes
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02	ferrous metal
19 12 03	non-ferrous metal
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries (consisting of lead batteries only)
20 01 40	metals

4.1.2 19 12 12 Recycling Facility

The focus of the 19 12 12 processing activity is the recovery of ferrous and non-ferrous waste. These will be combined with the relevant metal fractions recovered elsewhere on the site. All residual waste will be taken off-site for recovery as RDF.

4.2 Operational Flowcharts

The block diagram presented as Drawing 10934-000-I in **MPP5** provides a summary of processes and materials flows to be undertaken at the facility.

4.3 Hours of Operation

There are no restrictions on opening hours for the site. Normal opening hours are:

Monday – Friday	Saturday	Sunday	Bank/Public Holidays
07:30 – 17:00	Closed (except for maintenance)	Closed	Closed

Table 3. Hours for operations

4.4 Site Personnel

Technically competent staff will supervise the site and ensure that it is operated in accordance with the environmental permit, this Management System Plan and current legislation.

An organisation chart identifying persons responsible for key management functions, including responsibility for Environmental performance will be maintained by the company.

The Site Manager will ensure that sufficient competent staff are present on-site to manage and operate the sites activities without causing pollution. Staff will be competent in the activities they are expected to carry out. Staff will be expected to not only be competent in normal situations, but also be adequately trained so that they are competent in abnormal situations such as plant failures or accidents.



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The Technically Competent Person is Mr. Adrian Stewart who holds a WAMITAB Level 4 qualification in accordance with permit requirements. Other Technically Competent Persons will be recruited as necessary to maintain compliance with permit attendance criteria. The times that the Technically Competent Person spends at the facility during operating hours will be recorded in the Site Diary.

Staff roles and responsibilities will be clearly defined and names will be placed against each role and responsibility (e.g. technically competent person). Documentation stating who is in charge of ensuring compliance with each part of the permit and other relevant legislation and guidance will be kept and updated at least every 6 months, or if staff change roles or leave the organisation ([Procedure PR10](#) and [Form FR8](#)).

Any person with duties that are controlled by the permit will have convenient access to a copy of it, kept at or near the place where they work. This includes not only staff but any contractors that may be working on the site as well. The copy may be in paper form or electronically available. Staff and contractors will be made aware of the permit, what is contained in it, what their obligations are under it and where and how to access it during their initial site induction.

4.5 Staff Training

New employees will be given full induction training by site managerial staff or other appropriately qualified persons and records will be kept of all staff training in relation to operation of the site, site specific emergency procedures and the content and requirements of the Environmental Permit and Management System Plan.

According to their various roles and responsibilities, individuals will be instructed in the following necessary procedures regarding the environmental aspects of the site operations:

- Receiving and inspecting loaded waste vehicles.
- Duty of Care requirements and record keeping.
- Unloading and scrutinising tipped loads.
- Dealing with any unauthorised wastes.
- Use of any mechanical plant at the site.
- Storage of wastes.
- Dispatch of recovered materials and discards.
- Hazardous waste controls.
- General housekeeping including: cleanliness of the site and its environs, equipment maintenance, inspection and maintenance of any drainage systems.

All Technically Competent Persons holders will undertake training as required to demonstrate Continuing Competence. Environmental and competence training is provided by Smart Development Training Ltd.

A copy of this Management System Plan and Environmental Permit will be made available at the facility for all staff to read and, as a minimum; they will be informed of the importance of these documents and of the key areas of concern. They will also be fully briefed on the role of Natural Resources Wales in enforcing compliance.

Competence and training of all site employees is monitored by the site's HR Manager in accordance with [Procedure PR8](#). A training matrix and training records ([Forms FR6 and FR7](#)) are kept and maintained in the Weighbridge Office.



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4.6 Site Health and Safety

The company is conscious of its obligations to their staff, contractors and visitors and the company's Environmental Management System dovetails with the company's in-house Health and Safety management and Quality management processes and/or systems.

The company's Health and Safety Policy, induction pack/employee handbook and training programmes provide significant information to staff and visitors relating to on-site Health and Safety features, processes and duties.

Signage around the site highlights important safety considerations for staff and visitors before entering site. The full set of site rules ([ROI1 Site Rules](#)) is displayed on a board located to the right hand side of the incoming weighbridge and is clearly visible to drivers entering the facility. A copy of the site rules is also available at the main reception and a further copy affixed to the staff notice board.



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5 SITE INFRASTRUCTURE

5.1 Site Entrance

An identification sign is erected and maintained in a prominent position at the site entrance. The sign is approximately 1m by 1m and displays the following information.

- Site name and address
- Name of site operator
- Name of EP holder
- EP number
- Emergency contact telephone number
- Statement that the site is licensed by Natural Resources Wales
- Natural Resources Wales contact details
- Operational site hours

5.2 Site Accommodation

The site is equipped with the following facilities:

- Site office facilities
- Welfare/Mess facilities

The site office is positioned adjacent to the main entrance and is equipped with a telephone line, suitable for emergency calls. The office provides suitable space to permit secure short-term record keeping. All records specifically relating to recycling operations are retained on-site. The site office will keep a copy of the Environmental Permit (EP) and the most up-to-date approved copy of the Environmental Management System (EMS). All site staff are made aware of the EP and EMS, and are required to be aware of the documents' contents.

Appropriate welfare facilities are provided at site and maintained by site staff. Car parking is provided for staff members and site visitors in the vicinity of the site office. This area is maintained to minimise surface water ponding and to direct surface water to the sites' drainage system.

5.3 Plant and Equipment

The following plant and equipment is located within the site:

- 1 x shears.
- Baler.
- 5 x excavators with grab attachments.
- Hand tools including oxyacetylene cutting equipment.
- Mobile lifting and waste handling equipment.
- 2 x HGVs for transporting waste.
- 4 x trailer units
- Liquid storage tanks.
- Oxygen and Propane bottles.



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This equipment is primarily used for metal recycling. For the processing of 19 12 12 the following items will also be used in a building:

- Shredder fed by waste on an open conveyor from a hopper
- Over-band magnet
- Eddy current separator

These items will also be used to process other metal based streams already listed on the Permit.

A full list of significant items of equipment can be found in [FR4 Maintenance, Service, Calibration Schedule](#).

5.4 Lighting

Security lighting and lighting to ensure H&S requirements are met in low-light conditions is available. Lighting will be provided in the new building.

5.5 Site Security

The whole permitted site is within an enclosed site rented by EPS Materials Recovery Limited from Associated British Ports (ABP).

The Swansea Docks site is monitored by manned security personnel, with manned barrier controlled access operated 24/7. The permitted site is further secured by a combination of perimeter fencing and bunding, with all site equipment and machinery securely stored within the site boundary when not in use. Smaller items of equipment and valuable wastes are stored within secure containers or within the non-ferrous processing building. Access to the site is via palisade-type gates 2.4m high.

The security gates and site boundary are inspected daily as part of the site inspection schedule. The gates are locked at all times when the site is unattended.

During the period which the site has been operational, the security boundary has been proven to be fit for purpose.

The port site is monitored 24/7 by contractors of ABP, with CCTV cameras recording activity at a number of locations around the port. The site buildings are alarmed.

In the event of unauthorised intrusion, the circumstances and any subsequent action taken will be entered in the Site Diary.

5.6 Inspection and Maintenance Procedures for Site Infrastructure

The yard, treatment and storage / treatment buildings, office/welfare buildings, fence/bund and entrance gates/doors are inspected twice daily and the outcome of those inspections are recorded on the daily inspection checklist as shown in EMS [Form FR1](#) and if necessary as a CAR ([Form FR10](#)). The CAR will identify the root cause of the problem and allocate a person and timeframe to ensure that the corrective action is carried out. Any defect encountered during inspection will be repaired as soon as is reasonably practicable within the working day as a temporary measure and permanent repairs will be completed within 7 working days.

The existing concrete slabs will be inspected for wear and tear that may impact their suitability for use. Any defects will be repaired to a standard no less than that when new. The dates of all such inspections, the findings and any repairs and cleaning undertaken will be entered in the Site Diary.

Maintenance procedures are detailed in [Procedure PR9](#). A plant and equipment inventory and a maintenance schedule identifying items of plant, location of maintenance instructions and responsibilities will be kept and maintained ([Forms FR3 and FR4](#)). Maintenance records ([Form FR5](#)) for plant and equipment and site infrastructure will be kept in the Weighbridge Office and maintained by the Site Manager.



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6 SITE ENGINEERING FOR POLLUTION PREVENTION AND CONTROL

In general waste management activities at the site relate to the receipt, storage, size reduction, baling/bulking and dispatch of ferrous and non-ferrous metals for recycling at licensed waste management facilities. The processing of 19 12 12 waste will also generate ferrous and non-ferrous metals for recycling alongside a fraction of non-metallic wastes to be taken off-site for recovery.

6.1 Overview of Site

The site comprises a number of buildings and a large open yard area nominally divided into areas for the different waste operations.

6.1.1 Waste Treatment and Storage Activities (Existing)

Waste treatment and storage activities are currently undertaken on surfaces as follows:

Description of Activities	Surface
Storage of uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal waste	Ferrous - Hard standing or an impermeable surface without drainage (surface water removed by infiltration in adjacent unsurfaced land). Non-Ferrous - Impermeable surface with sealed drainage to sump or hard standing with sealed drainage system to surface water sewer.
Storage of all other wastes (including contaminated ferrous metal wastes or alloys, contaminated non-ferrous metal waste, hazardous and residual wastes)	Non-Ferrous - Impermeable surface with sealed drainage system to sump or hard standing with sealed drainage system to surface water sewer. Other wastes - Impermeable surface with sealed drainage system.
Treatment of wastes (baling, cutting, grinding, shearing, etc.)	Impermeable surface with sealed drainage system to sump, or hard standing or an impermeable surface without drainage (surface water removed by infiltration in adjacent unsurfaced land).
Storage of batteries	Lead acid batteries stored in containers with an impermeable, acid resistant base and a cover to prevent ingress of water.
Storage of liquids	Bunded containers.

6.1.2 Waste Treatment and Storage Activities (Proposed)

Waste treatment and storage activities will be undertaken on surfaces as follows:

Description of Activities	Surface
Storage of uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal waste	Hard standing or an impermeable surface with sealed drainage to class 1 full-retention interceptors (with silt trap) for treatment prior to discharge to coastal waters.



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Storage of all other wastes (including contaminated ferrous metal wastes or alloys, contaminated non-ferrous metal waste, hazardous and residual wastes)	Impermeable surface with sealed drainage system to sealed sump.
Treatment of wastes (baling, cutting, grinding, shearing, etc.)	Impermeable surface with sealed drainage system to sealed sump.
Storage of batteries	Lead acid batteries stored in containers with an impermeable, acid resistant base and a cover to prevent ingress of water.
Storage of liquids Storage and treatment of waste coded 19 12 12	Bunded containers. Inside a building with an impermeable surface and sealed dra

These changes will be implemented to a schedule to be agreed with NRW.

6.2 Yard Area (Existing)

6.2.1 Surfacing Design and Construction

Drawing 10934-000-C in [MPP5](#) details surfacing within the site.

The yard area is surfaced as follows:

- 220mm thick concrete bedded on clean hardcore or crushed stone laid to a minimum depth of 200mm;
- ~50mm asphalt on 220mm thick concrete bedded on clean hardcore or crushed stone laid to a minimum depth of 200mm;
- 180mm thick asphalt hardstand; and
- 150mm thick stone hardstand.

A small unsurfaced area is located at the western extremity of the site.

6.2.2 Drainage Design (Existing)

Drawing 10934-000-D in [MPP5](#) shows a drainage plan of the existing site.

Treatment Area 1 - A 14m x 9m concrete pad area, located to the western corner of the site is used for the treatment (shearing) of metal wastes. This pad is graded such that surface water falls by gravity to a drain located at the northern edge of the pad. Surface water is subsequently transferred via a sealed drainage system to a sump located to the south of the pad.

Treatment Area 2 – An approx. 30m x 20m concrete pad area is located to the west of Treatment Area 1 and is used for cutting, grinding and storage of metal waste prior to treatment. This pad is graded to channel surface run-off in a south westerly direction until it reaches the periphery of the site where it filtrates into the surrounding hardstand and unsurfaced areas.

Treatment Area 3 – An approx. 16m x 6m hardstand area used for treatment (shearing) is located to the south of the site adjacent to the bund running along the southern boundary. This area is graded to channel surface run-off in a south westerly direction until it reaches the periphery of the site where it filtrates into the surrounding hardstand and unsurfaced areas.



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Treatment Area 4 – A 7m x 7m “L-shaped” concrete pad area used for treatment (baling) is located along the southerly boundary to the east of Treatment Area 3. This pad is kerbed to retain surface run-off within the pad area from where it is pumped to IBCs for storage prior to disposal at licensed waste management facilities.

Storage Area 1 – An approx. 140m x 15m concrete pad area located to the north of the site running parallel with the wharf. Surface run-off flows by gravity in a north-westerly direction until it is held back by the kerbed edge of the dock and is channelled westwards where it filtrates into the surrounding hardstand and unsurfaced areas.

Storage Area 2 – An approx. 165m x 15m asphalt hardstand area running parallel with the southern boundary of the site and nominally divided into 3 separate stockpiles. This area is graded to channel surface run-off in a south westerly direction until it reaches the periphery of the site where it filtrates into the surrounding hardstand and unsurfaced areas.

Storage Area 3 – A 20m x 12m concrete surfaced bunded storage area to the east of the site. Surface water drains to the rear of the pad and is retained by the walls of the storage area. It is subsequently pumped from the bunded area into IBCs located on hardstand adjacent to the storage area.

Storage Area 4 – An approx. 25m x 11m concrete area graded such that surface water run-off travels north and infiltrates into unsurfaced ground adjacent to the storage area.

Storage Area 5 – An approx. 26m x 13m “L-shaped” asphalt hardstand storage area. This area is graded to channel surface run-off in a south westerly direction until it reaches the periphery of the site where it infiltrates into the surrounding hardstand and unsurfaced areas.

The remainder of the yard area is graded to channel surface run-off in a north westerly or south westerly direction until it reaches the peripheries of the site where it filtrates into the surrounding hardstand and unsurfaced areas.

On a weekly basis, and more often during other periods such as adverse weather conditions, site operatives will inspect the sealed sumps and check the level of retained water. Water will be removed and taken to a licensed waste management facility for treatment. This will be recorded and monitored within the site diary.

6.2.3 Yard Area (Changes in Progress)

Block and drainage plans of the site annotated with changes to surfaces and planned changes to drainage in are shown in Drawings 10934-000-D (Rev. A) and 10934-000-D (Rev. A) in [MPP5](#). On completion, this EMS requires updating to reflect the on-site design and infrastructure in place.



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6.3 Treatment/Storage Building (Existing)

6.3.1.1 Design and Construction

Non-Ferrous Processing is carried out within a 24.5m x 12.5m building of a steel portal frame construction covered in trapezoidal formed steel cladding.

The existing floor comprises an impermeable reinforced concrete surface >200mm thick.

The floor will be inspected annually by a Chartered Civil Engineer who will report whether or not the impermeable surface is in a good condition and suitable for the purpose described in this plan.

Non-Ferrous waste storage is carried out both within the building and within designated areas within the yard as detailed in 6.2.2.

6.3.1.2 Drainage Design

A fall on the concrete slab channels liquid by gravity to the centre of the building where it can be manually removed.

Roof water from the Processing Building is directed through gutters and downpipes to surface water sewer.

6.3 Treatment/Storage Building (Proposed)

A new steel framed and steel clad building is proposed for the management and processing of waste coded 19 12 12. The detailed design of the building is not yet complete but the machinery is in place and being commissioned. Prior to the building being erected the plant will be used to process other metal based wastes already listed on the Permit. Prior to 19 12 12 being accepted at the site the detailed design will be provided to NRW for approval.



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6.3.2 Office Building

6.3.2.1 Design and Construction

A 30m x 10m single storey, brick-built, office building is located close to the entrance to the site and adjacent to two weighbridges. The building houses the weighbridge office, administrative offices and staff welfare facilities.

6.3.2.2 Foul Drainage

Foul water from the welfare/toilet facilities is connected to a septic tank and soakaway.

6.3.2.3 Roof Water Drainage

Roof water from the Office Building is directed through gutters and downpipes to surface water sewer.

6.4 Design and Construction of Fuel, Oil and Gas Storage Tanks

The following fuel, oil and gas storage is present on-site:

Diesel is stored above ground in a double – skin metal tank holding 5,000 litres. The tank is located within a concrete bund capable of holding >110% of the tank capacity.

Diesel is also stored above ground in a double – skin plastic tanks holding 4,000 (shears)

Heating Oil is stored above ground in a double – skin plastic tank holding 1,500 litres.

Oxygen and Acetylene gas bottles are stored in purpose built frames stored to the west of the site.

Workshop oils and lubricants are stored in a locked metal container to the rear of the office building.



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7 SITE OPERATIONS, SYSTEMS AND PROCEDURES

7.1 Waste Acceptance, Control Systems and Procedures

Refer to [Procedure PR7](#) for details of Waste Acceptance Procedure.

7.2 Waste Quantity Measurement System

Two weighbridges are operational on-site.

All waste arriving or leaving the facility is required to pass over a site weighbridge for the purposes of recording the consignment weight.

Each weighbridge receives at least 1 annual calibration check in addition to the regular system checks as required under weights and measures legislation.

The information regarding weights passing over the weighbridge is retained at the weighbridge office for further reference.

CCTV footage is recorded at the Weighbridge.

7.3 Waste Sampling and Testing

It is not normally necessary for the Permit Holder to sample and analyse waste supplies since these are limited to loads of predictable nature. Where non-conforming materials are discovered these will be quarantined and expert advice sought. This, as appropriate, will include the advice of Natural Resources Wales.

The occasions when any sampling is undertaken will be recorded in the Site Diary. Results of all such analyses will be retained in the site office.

7.4 Waste Hierarchy

All waste should be considered and treated in accordance with the waste hierarchy (Article 4 of the Waste Framework Directive). Where disposal is necessary, this should be undertaken in a manner that minimises its impact on the environment.

7.5 Waste Treatment Procedures

This document, and any other procedures contained within the EMS (and relevant H&S and Quality documents) should be followed at all times.

7.6 Waste storage

7.6.1 General

Waste will be stored in designated areas of the facility.

Storage areas will include:

- Metals awaiting treatment by cutting, grinding, shearing or baling
- Processed metals awaiting loading and dispatch
- Hazardous waste storage area
- Quarantine area
- Residual waste storage area
- Indoor storage of 19 12 12 pending treatment

A storage plan for the facility is presented in Drawing 10934-000-E in [MPP5](#).



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7.6.2 Outside Storage

With the exception of certain high-value non-ferrous metals, waste coded 19 12 12 and residues from the processing of 19 12 12, all wastes are stored outside.

7.6.3 Storage Durations

The facility will have the following maximum tonnages and storage times:

Material	Number/Tonnes	Storage Time
Ferrous and Non-Ferrous Metals	150,000 Tonnes	3 years
Batteries	20 Tonnes	3 months
Hazardous wastes	10 Tonnes	3 months
Quarantined wastes	10 Tonnes	1 month
Residual waste	20 Tonnes	1 month
Waste coded 19 12 12	100 tonnes	1 month

In accordance with the requirements of the site's permit:

Wastes shall be stored for no longer than 3 years prior to recovery.

7.7 Dispatch

Wastes leaving the site for further treatment, disposal or recovery, are described, quantified and appropriately containerised (where necessary) in accordance with the Duty of Care. Such materials are transported by authorised waste carriers only and dispatched only to authorised outlets.

Hazardous wastes removed from the site will be handled in accordance with the required consignment note procedures.

All records of delivery and dispatch, including copies of the Duty of Care Transfer Notes, Hazardous Waste Consignment Notes, Trans-Frontier Shipment records, etc. will be maintained in the site office. These are available for inspection by authorised officers of Natural Resources Wales at any reasonable time. Quarterly 'waste returns' will be provided to Natural Resources Wales as required.

The Company's regular waste suppliers and outlet providers will be periodically visited and their control procedures assessed to safeguard the Permit Holders' Duty of Care responsibilities.

7.8 Contingency

Should the process controls fail at any point within the processing of wastes through any of the operational processes, acceptance of waste into the site will operate in this order:

The site will not accept more waste that it can process effectively at any one time and not above the permitted tonnage per annum or storage capacities stated in Section 7.6.

In the event that the site reaches its maximum capacity, the Site Manager will divert any further incoming waste from the site to neighbouring facilities that are able to process the same types of waste until such a time when the site can resume operations within its normal operating capacity.

Receipt of feedstock materials shall not recommence until a full review of this Management Plan has been conducted and process controls amended as required.

7.9 Records

Records for wastes received and dispatched at the site are kept securely in the Weighbridge Office. The company will maintain a register of waste facilities to which it dispatches wastes along with copies of their environmental permits and EWC codes permitted at the facility ([Form FR11](#)).



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8 POLLUTION CONTROL AND AMENITY MANAGEMENT, MONITORING AND REPORTING SYSTEMS

8.1 Pollution Control and Amenity Management

8.1.1 General

8.1.1.1 Site Inspections

The Site Manager is responsible for carrying out site inspections on a twice daily basis. These inspection provide a mechanism to assess whether site operations are being carried out in accordance with the EMS and that environmental management and control systems are operating within expected performance limits. A record of site inspections is made on a Site Inspections Checklist ([Form FR1](#)), along with any remedial action required.

8.1.1.2 Monitoring and Sampling

Where Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator will inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.

8.1.1.3 Site Emergency Plan

The company has an Accident/Pollution Incident Management Plan which forms part of its Environmental Management System ([MPP4](#)). This complies with Natural Resources Wales's requirements for a Site Emergency Plan.

8.1.1.4 Accidents and Incidents

The Accident/Pollution Incident Plan ([MPP4](#)) and EMS Procedures ([Procedures PR1 – PR6](#)) detail the approaches that should be followed in the event of an accident or pollution incident. Any incident should be recorded on an Environmental Accident (and Incident) Record ([Form FR9](#)) and reported in accordance with [Procedure PR11](#).

8.1.1.5 Environmental Risk Assessment

An environmental risk assessment ([Risk Assessment RA1](#)) has been undertaken for the facility and has informed the measures implemented in the following sections. Key considerations for the facility are:

Contamination of sensitive coastal waters (Shellfish Waters) due to leaks and spills.

Due to the scale of the facility and nature of wastes received, and its distance from sensitive receptors the likelihood of impact from odour, noise, dust, litter, pests, mud and fugitive emissions is assessed as low. These risks still require consideration and control and monitoring steps are also detailed below.

A summary of Environmental Impacts and Controls can be found in [MPP2](#).

8.1.2 Management of Environmental Risks

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

If notified by Natural Resources Wales that the activities are giving rise to pollution, the Operator will submit to Natural Resources Wales for approval within the period specified, an emissions management plan. This plan will be implemented from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

8.1.2.1 Leaks and Spills

EMS [Procedure PR3](#) details the spillage procedure and should be followed in the event of a spill.



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

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

All fuels and oils will be stored in double-lined bunded tanks.

Delivery of fuels and oils will be supervised by a responsible member of staff.

The quantity of fuel in storage will be checked, either using a sight glass or by dipping, prior to the fuel delivery being made. The maximum residual capacity of the tank will be determined prior to the commencement of re-filling, so as to prevent overfill.

All hydraulic, lubricating and waste oils will be stored on/above a suitable spillage containment tray, which will collect any leaks from the drums.

All drums and similar containers stored within the facility will have their contents and capacity clearly marked.

To prevent spillages, drum openings will be carried out on a spillage tray.

Sand and absorbent granules are to be kept on site at all times for immediate use to soak up minor spillages.

In the event of a major spill, immediate action will be taken to contain the spillage and prevent contamination of surface water run-off. Closure of the penstock valve controlling the discharge of site surface water should be undertaken immediately. Once contained, the spillage will be treated with absorbent and removed to a sealed container for disposal at a licensed facility. The stock of sand and granules shall be replenished as soon as possible.

A supply of lime will be maintained to neutralise any spillage of battery acid.

Records shall be recorded in the site diary and a CAR raised (**Form FR10**) to show how the spillage occurred (if known), what the spillage was and the remedial actions taken.

Operational staff will receive pollution prevention and spill response training.

Any spillages will result in a CAR being raised to establish the root cause of the problem and if deemed necessary reviewed at quarterly business management meetings or sooner if there is a significant risk to the environment or operations of the business.

8.1.2.2 Fire Prevention and Control

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

The site of the fire will be immediately evacuated of non-essential personnel and in the case of a minor incident, fire extinguishers or water spray will be applied.

In the event of a major or a potentially major fire occurring, the emergency services will be notified, the site cleared of all personnel and necessary co-operation offered to the senior emergency officer in attendance. In the event of firefighting which necessitates the application of quantities of water, a temporary boom may be constructed by laying an adequate number of sandbags or similar items or equipment in order to contain any runoff from entering the adjacent dock. Closure of the penstock valve controlling the discharge of site surface water should be undertaken immediately and site drains to the rear of the office will be sealed using covers or sand bags. Following containment of such runoff, the liquid collected will be disposed of according to any contaminants that may be present e.g. suspended solids will be separated or if any other contaminants are present (e.g. fuel/oil from vehicles/plant) the liquids will be removed from the site by a suitably licensed carrier to a suitably licensed (permitted) disposal facility.



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All incidents of fires will be reported to Natural Resources Wales as soon as reasonably practical (Tel 0800 80 70 60 (National) or 03708 506 506 (Local)).

The following measures will be taken with respect to fire prevention and control:

- No material of any kind shall be burned within the boundaries of the site.
- Smoking is only permitted in the designated area outside of the entrance to the facility.
- Suitable and adequate firefighting materials and equipment will be maintained and kept at appropriate locations on the site as advised by the local fire service.
- All site staff will be trained in the use of onsite firefighting equipment and all firefighting equipment will be replaced/refilled immediately after use. Scheduled maintenance, inspection and overhauling of all firefighting equipment will be carried out on an annual basis.
- In the event of a fire the site will be evacuated and all non-essential personnel, including all members of the general public/visitors. The appropriate emergency services will be called to attend to, or be informed of, any outbreak of fire.
- Neighbours will be advised of the fire occurring at the earliest possible opportunity.
- NRW will be informed of any fire arising on site as soon as is practicable and no later than the following day. Any incidents will be recorded in the site diary and a CAR raised as necessary, along with the details of any actions taken.

8.1.2.3 Surface Water and Groundwater Pollution

All site containment and drainage systems will be inspected at least weekly, throughout the operational life of the site for cracks, defects and cleanliness, by appropriate site staff. The results of each site inspection shall be recorded on the daily/weekly site checklists. All maintenance and repair works will be carried out at the earliest opportunity and with due consideration given to the nature and scale of the issue. NRW shall be informed of all remedial works.

In the event that a storage tank is found to be leaking, arrangements will be made to have the contents transferred to an alternative container, pending completion of repairs. Any water contaminated with fuel and oil in any bunded area will be removed by an appropriately registered waste removal contractor.

The outside storage area will be checked daily as part of the daily site inspection.

The following control measures will be implemented to minimise potential impacts on surface and groundwater:

- Company spillage procedure will be followed in the event of a spill (see 8.1.2.1 for details regarding the control and monitoring of Leaks and Spills).
- Regular maintenance of operational areas such as drainage channels will be carried out.
- Containers and bunds will be inspected and maintained.
- Written management systems will be in place for the identification and minimisation risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances.

8.1.2.4 Flooding

Other than localised flooding of the site during periods of exceptionally heavy rainfall, inundation of the site by sea water (during exceptional high tides coupled with storm surges) is a potential risk for this site (and much of the Swansea Dock area). The site has been assessed and has between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year.



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In the event of a flood the permitted waste types that may be washed off site would add to the volume of the post-flood clean-up workload, rather than the hazard. Post-flood clean-up would be made more difficult were waste to be washed into the adjacent dock.

In the event of flooding (or of likely flooding) of the site, the following steps would be taken (only where safe to do so):

- Wastes, liquids and other materials with potential to be washed from the site shall be removed from site (or relocated within the site) to areas less likely to be affected by floodwater;
- The edge of the dock would be bunded using appropriate materials in order to retain waste materials within the site; and
- Where any risk of contaminated water discharging from site as flood waters recede is identified the site's penstock will be closed. Actions required to manage the retained flood water will be identified and actioned in agreement with Natural Resources Wales and the Emergency Services.

8.1.2.5 Noise and Vibration

Site noise is only likely to occur as a result of the movement of plant and vehicles on site or during use of recycling equipment. The noise generated by these activities is similar to other plant and vehicles in general use on the surrounding dock.

All vehicles and plant used at the facility will be of a roadworthy type and to The Road Vehicles (Construction and Use) Regulations 1986 in respect of engine noise and emissions and exhaust silencers. They will be well-maintained and serviced at regular intervals as recommended by the manufacturer.

An auditory inspection shall be carried out by the site manager at least twice per day. Noise levels which are considered higher than usual shall be investigated and recorded in the site diary. Activities will be reduced or stopped until operations are able to commence without elevated noise levels.

The following measures will be taken to minimise the risk of noise and vibration:

Access roads will be kept in a reasonable condition such that potential noise from vehicles is minimised; All plant machinery will be subject to regular inspection and maintenance;

Installed noise reducing equipment (acoustic panels, silencers, etc.) shall be used and maintained;

Equipment shall be switched off when not in use; and

Treatment operations shall be arranged in such a way as to minimise noise production as far as possible.

If notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, the Operator will submit to Natural Resources Wales for approval within the period specified, a noise and vibration management plan. This plan will be implemented from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

8.1.2.6 Dusts, Fibres and Particulates

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

Operations potentially giving rise to dust generation include:

- Waste receipt and stockpiling;
- The on-site transfer of materials between the processing and the stockpiling/storage areas;
- Processing operations such as grinding;



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- The loading of processed materials onto transport vehicles;
- Where appropriate the sweeping of roads where there have been deposits observed. The

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

Loads shall be checked for dust generating materials prior to and during tipping;

Vehicle speed shall be limited;

Visual dust monitoring shall be undertaken at least twice per day (and records of such recorded within the site diary/inspection form) and generally on an ongoing basis by Site Operatives during processing;

Where airborne material is observed, this will be recorded via the site diary and corrective/preventive action taken.

Action will include:

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

Records of such will be recorded within the site diary/inspection form and if necessary raised as a CAR.

8.1.2.7 Litter

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

A daily record of litter inspection is logged on the Site Inspection Record ([Form FR1](#)) and during the working day, site supervisors will be alerted to incidents of litter on site.

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

Light contrary waste fractions to be stored correctly.

In the event of litter being detected during the daily inspection the following measures will be implemented:

Any litter that is blown outside of the site boundary will be collected no later than 1 hour after the end of the working day.

The litter collected will be deposited in the relevant container, either for recycling or disposal.

8.1.2.8 Mud and Debris

The site is largely laid to concrete or hardstand and is located in the centre of a large dockside industrial estate. This results in limited opportunity for mud generation.

If during extensive adverse weather conditions, the surfaced areas are seen to be deteriorating in standard of cleanliness, mechanical sweeping supplemented by mechanical cleansing will be implemented.

8.1.2.9 Pests

Due to the nature of the waste and inspection procedures in place, there is little likelihood of animal by-products and food waste that attract pests being received at the facility.

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

Waste inspected before tipping to identify potential contaminants;

Quarantine non-conforming putrescible wastes and removal off-site within 72 hours;

Visual monitoring for pests/vermin performed daily including inspections for evidence of droppings, damage to property/plant or ground disturbance e.g. burrow, nests and excessive infestation present; and



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Good housekeeping and regular inspection of mess facilities.

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

Suitable treatment will be implemented either by employees or by suitable contractors, this may involve the application of insecticides or the setting of traps and poisons, or other measures as appropriate;

Any waste identified as attracting scavengers shall be isolated and removed from site.

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

8.1.2.10 Odours

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

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

Rigorous site management practices;

Waste inspected at the weighbridge and during tipping to identify odour and/or potential odour generating contaminants;

The rejection (and recording) of odorous wastes;

The prevention of odorous waste being accepted in future loads by recording and noting the waste producer/carrier as per the 'duty of care' records.

Where identified onsite, odorous waste shall be isolated, stored in covered containers to prevent the release of odour and removed as soon as possible from site;

An odour inspection at the site boundary will be carried out by the site manager at least twice per day. Should odour be identified at the site boundary this will be recorded in the site inspection report. Measures to address the odour issues shall be taken immediately. These may include the removal offsite of offending materials, activities being reduced or stopped until operations are able to commence without elevated odour levels or industrial deodoriser being applied.

If notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to odour, the Operator will submit to Natural Resources Wales for approval within the period specified, an Odour Management Plan. The plan will be implemented from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

8.1.2.11 Other Fugitive Emissions

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

The following measures will be taken to control other fugitive emissions:

- All plant machinery will be subject to regular inspection and maintenance;
- Good fuel tank and transfer pipework design.
- Vehicles shall be compliant with relevant exhaust emissions standards;



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8.2 Monitoring

8.2.1 Existing

No formal monitoring is required under the existing Permit conditions.

8.2.2 Proposed

A programme of monitoring of the discharge to surface waters (discussed in 6.2.2) will be agreed with NRW.

8.3 Reporting

8.3.1 Periodic Reporting of Environmental Performance

A quarterly summary will be submitted to NRW in a form to comply with requirements.

A copy of the waste classification (EWC) will be held on site for reference.

8.3.2 Notifications

The following information will be submitted to Natural Resources Wales as soon as practicable after the event (in line with Permit conditions):

- Actual or potential pollution incidents (within 24 hours);
- Breaches of emission limits (within 24 hours);
- Accident and/or fugitive emission (within 24 hours);
- Breach of operating procedures (within 3 days);
- A change of TCM (7 days);
- A conviction and/or an appeal (14 days);
- Financial changes affecting the site operations with regard the conditions within the permit (14 days); and
- Activity commencement and/or changes (7 days).

Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange rules:

a) Where the operator is a registered company:

- any change in the operator's trading name, registered name or registered office address; and
- any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

b) Where the operator is a corporate body other than a registered company:

- any change in the operator's name or address; and
- any steps taken with a view to the dissolution of the operator.

c) In any other case:

- the death of any of the named operators (where the operator consists of more than one named individual);
- any change in the operator's name(s) or address(es); and



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- any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case them being in a partnership, dissolving the partnership.

8.3.3 Interpretation

As per the meanings described within the permit.

8.4 Complaints

Complaints are to be investigated immediately by the Site Manager. The nature and details of the complaint will be logged on a complaints record form (**Form FR2**), along with the findings of the investigations and any action required. The Site Manager is responsible for determining the appropriate action to be taken and will communicate the nature of the actions to be taken and timescales to the Complainant.

The company's complaints procedure (**Procedure PR12**) applies to all complaints, feedback and requests made by third parties regarding operational activities.

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

The Site Manager will ensure that:

All complaints are logged;

The complaint is investigated to identify the cause. If a complaint is relayed to the company by a 3rd party (e.g. Natural Resources Wales), this may require direct communication with the complainant in order for the complaint to be effectively investigated;

Necessary preventative action is taken to both address the cause of the complaint and that measures are implemented to prevent a reoccurrence of the same problem. These actions must be documented and a CAR raised as required;

The Complainant will be contacted and given information on the investigations conducted and actions taken as appropriate;

Where a complaint or query is likely to involve a statutory authority, the emergency services, an insurance company, or the media, the Managing Director will be informed;

Complaints linked to contracts with specific complaints procedures will be reported in line with contractual requirements and timescales. Local procedures may need to be in place to ensure these are adhered to;

All complaints are discussed at site meetings and reviewed at monthly management meetings; and If the investigation indicates that the complaint has not been justified this will be clearly recorded on the Incident Report.

In the event of a complaint being verified as resulting from the operation of the facility the Site Manager is responsible for identifying short and long-term mitigation measures to minimise the risk of future incidents. The efficacy of any mitigation measures will be confirmed through further monitoring at the receptor (subject to the Complainant's agreement) or at a representative position along the site boundary.

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



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9 SITE RECORDS

9.1 Security and Availability of Records

The operator will keep on site all records, plans and the management system required to be maintained by its Environmental Permit, unless otherwise agreed in writing by Natural Resources Wales. These will be kept securely in the Weighbridge Office.

Most documents are securely stored electronically, with paper copies also available where required.

Access to the statutory documents and records are made available to any authorised Natural Resources Wales Officer.

Details of documentation and security arrangements are considered to be confidential but can be a matter of discussion with an authorised Natural Resources Wales Officer.

Natural Resources Wales will be provided with a summary of types of quantities of wastes received at the site. These records will be relayed to Natural Resources Wales in an agreed format and at an agreed frequency. The site diary will be stored in the office which is locked outside of office hours. The diary will be used to record site activity and any unusual events. The diary will be made readily available for inspection by any Natural Resources Wales Officer at any reasonable time.

A record of site visitors will be kept including;

- Name (including signature) and company/organisation
- Car Registration
- Person to See
- Time of arrival and departure

The time (when necessary) and the date of the following events shall also be recorded in the site diary:

- Start and finish of any construction/engineering works within the site boundary;
- Start and finish of any management processes carried out on site;
- All maintenance;
- Breakdowns;
- Emergencies and environmental incidents and remedial actions taken;
- Problems with waste received and action taken;
- Evidence of all waste entering and leaving the site; where from, date, time, weight;
- Site inspections - who carried out the site inspection, date and time, why and the consequent actions carried out by the operator;
- Attendance of technically competent management on site and the date and time of departure of the technically competent manager;
- Despatch of records to Natural Resources Wales;
- Extreme weather conditions; and
- Complaints and actions taken.



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DRAWINGS AND PLANS

Refer to [MPP5](#) for current Site Drawings and Plans



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MPP4 Accident/Pollution Incident Management Plan



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MPP4 Accident/Pollution Incident Management Plan

Further help is available from **PPG21: Pollution incident response planning** (See section 7)

Review Date: 03/09/18 Version: 1.4

Accident / Pollution Incident Management Plan Contents

A – Site Plan

B – Key Site and Emergency Contacts

C – List of Substances and Storage Facilities

D – Preventing Accidents / Incidents... and what to do if they happen.

A – Site Plan

Insert site plan showing location of the following items:

- **Site entrances and exits** available to the emergency services
- **Buildings**; the buildings and other main constructions
- **Drainage**; including
 - foul drainage (marked in red),
 - surface water drainage (marked in blue) showing
 - the direction of flow and
 - the discharge points to the sewer, watercourse or soakaway.
 - The location of manhole covers and drains,
 - The location of stop and diverter valves and interceptors
- **Service mains**; the routes of
 - water supply, gas, electricity)
 - mains water stop tap, and gas and electrical supply isolating valves / switch.
- **Storage of hazardous materials**; e.g. oil and fuel tanks, chemical stores, raw materials, waste materials etc.
- **Process lines**; location and direction of main process lines/pipes.
- **Accident and emergency response items**; such as fire extinguishers, fire hydrants, fire water tanks / ponds, spill kits, sand bags, alarms, first aid kit etc.
- **Vulnerable receptors**; on site or adjacent receptors that could be affected by the site operations, such as porous / unmade ground, watercourses, springs, boreholes, ecologically sensitive sites, residential properties, schools, offices, hospitals etc.
- **Pollution control points**; such as inspection or monitoring points, bunds,
- **Treatment**; location of any on site trade effluent or sewage effluent treatment plant.

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B – Key Site and Emergency Contacts

SITE DETAILS			
Location:	EPS Materials Recovery, Graigola Wharf, King's Dock, Swansea		
Postcode:	SA1 8QT		
Site Access Grid Reference:	Docks (SS 69213 92974 and SS 67411 92769) Site (SS 68282 92795)		
SITE CONTACTS	Name	Office Hours (specify)	Out of hours
Managing Director:	Richard Phillips	01792 646985	07836 337899
General Manager:	Adrian Stewart	01792 646985	07774 903373
Site Manager:	Darren Stillman	01792 646985	07527 325336
Site Supervisor:	N/A	N/A	N/A
Security Contact:	ABP	01792 645101	N/A
Landowner / Agent:	ABP	01792 645101	N/A
EMERGENCY SERVICES		Office Hours	Out of hours
Emergency		999	999
Medical: Welsh Ambulance Services NHS (Central & West Region)		01792 562900	111 (non-emergency)
Police: South Wales Police 'H' Division - Swansea		01792 456999	101 (non-emergency)
Fire: Mid & West Wales Fire and Rescue – Swansea County Command		0370 6060 699	0370 6060 699
REGULATORS		Office Hours	Out of hours
Health and Safety Executive (HSE)		0345 300 9923	0151 922 935
Local Authority:		01792 635600	01792 841654 (Highways only)
Natural Resources Wales (Local)		01792 326450	N/A
Natural Resources Wales (24hr emergency)		0800 807060	0800 807060
UTILITY / KEY SERVICES	Name	Office Hours	Out of hours
Water undertaker:	Dwr Cymru	0800 052 0130	0800 052 0130
Sewerage undertaker:	Dwr Cymru	0800 052 0130	0800 052 0130
Gas supplier:	N/A	N/A	N/A
Electricity supplier:	ABP	01792 645101	N/A
Oil supplier:	Oil4Wales	02920 674 910	N/A
Fuel supplier:	Oil4Wales	02920 674 910	N/A
Chemical supplier:	Various	N/A	N/A
Oil spill contractor:	Siddell	01554 778 486	N/A
Maintenance contractor:	Various	See maintenance folders	N/A
Electrician:	N/A	N/A	N/A
Plumber:	N/A	N/A	N/A
Locksmith:	N/A	N/A	N/A
Joiner:	N/A	N/A	N/A
OTHER KEY CONTACTS	Name	Office Hours	Out of hours
Head Office:	N/A	N/A	N/A
Adjacent landowners:	ABP	01792 645101	N/A
Neighbours:	Stenor	01792 474377	N/A
Specialist advisors:	Geotechnology (Environmental)	01639 775 293	N/A



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C - List of Substances and Storage Facilities

The following is a list of liquids, powders etc. that are stored on site and could be harmful to the environment if they escape.

Material	Maximum Quantity	Type and size of storage	Type and size of Secondary Containment
Heating oil	1,500 litres	Plastic tank	External integrated plastic bund >110% of capacity
Diesel (Main Storage)	5,000 litres	Single skin steel tank	External concrete bund >110% of capacity
Diesel (Baler)	5,000 litres	Plastic tank	External integrated plastic bund >110% of capacity
Diesel (Shears)	1,500 litres	Plastic tank	External integrated plastic bund >110% of capacity
Diesel (Shears)	1,500 litres	Plastic tank	External integrated plastic bund >110% of capacity
Petrol	None	N/A	N/A
Engine oil	None	N/A	N/A
Engine Coolant	None	N/A	N/A
Screen Washer Fluids	None	5 litre plastic containers	Metal container
Workshop Oil	50 litres	N/A	N/A
Caustic Chemicals, Acids, etc	None	N/A	N/A