Environmental Management System (EMS)

EV Recycling
ATC Wales

March 2025

Site Location:

EV Recycling Ltd., ATC Wales
Unit 12, Llanelli Gate,
Dafen, Llanelli,
Carmarthenshire,
United Kingdom,
SA14 8LQ

Overview

This document follows the guidelines of Natural Resources Wales (NRW) on the **Environmental Management System (EMS)** for small and medium sized businesses. Its intended use is to assist with the management of the operations of EV Recycling Ltd. (ATC Wales), to **reduce the risk of harming the environment** and continuously improving our environmental credentials.

In summary, this document helps EV Recycling demonstrate the following:

- Show that activities that could harm the environment are under control
- Develop an environmental management system for site activities
- Be less likely to breach our permit or cause pollution and, therefore, avoid enforcement action
- Avoid having to pay higher charges for non-compliance
- Helps the business to satisfy our Environmental and Sustainability Policy, and comply with our ISO 14001 accreditation.

As a result of this document, benefits to EV Recycling also include:

- Improved resource efficiency and productivity, which helps to build a sustainable business
- Reduce risks and potential losses
- Reduced operating costs, including costs associated with environmental regulations
- More likely to obtain business from companies that require environmental impacts from other businesses to be managed effectively
- Improved reputation amongst staff, customers and the public
- Increased chance of funding for our business by demonstrating responsible environmental management
- Improved legal compliance, avoid prosecution, receive fewer visits from environmental regulators (Natural Resources Wales).

Document Revision History			
Date	**Author**	**Version**	**Notes**
05/07/2019	Sam Joseph	1	Report - Version 1
23/08/2019	Sam Joseph	2	Procedures added and a general review of the document
03/09/2019	Sam Joseph	3	Page numbers added, spelling checks and adjustments to content
01/11/2019	Sam Joseph	4	Section 1; Table 1; Summary Updated Section 2.4; Text amendments
15/01/2020	George Chamberlain	5	Address Change
05/02/2020	Sam Joseph	6	Address Updated; New Site Maps added; Waste Codes Checked
11/02/2020	Sam Joseph	7	Storage Map and Drainage Plan
16/03/2020	Sam Joseph	8	Confidentiality Justification Review
18/08/2020	George Chamberlain	9	Schedule 5 Responses added
26/08/2020	George Chamberlain	10	Removed non necessary confidential information for the Schedule 5 response. Removed Confidential Markings
23/09/2020	George Chamberlain	11	Schedule 5 Response
21/10/2020	George Chamberlain	12	Schedule 5 Response
10/11/2020	George Chamberlain	13	Added table 2E
26/09/2023	Sam Joseph	14	Text amendments, site map updates, process definition additions to include hazardous waste battery manufacturing scraps materials
29/07/2025	Sam Joseph	15	Normal Variation updates, including: Site map updates, changes to storage capacities & throughput limits

Contents

1. Introduction. Table 1

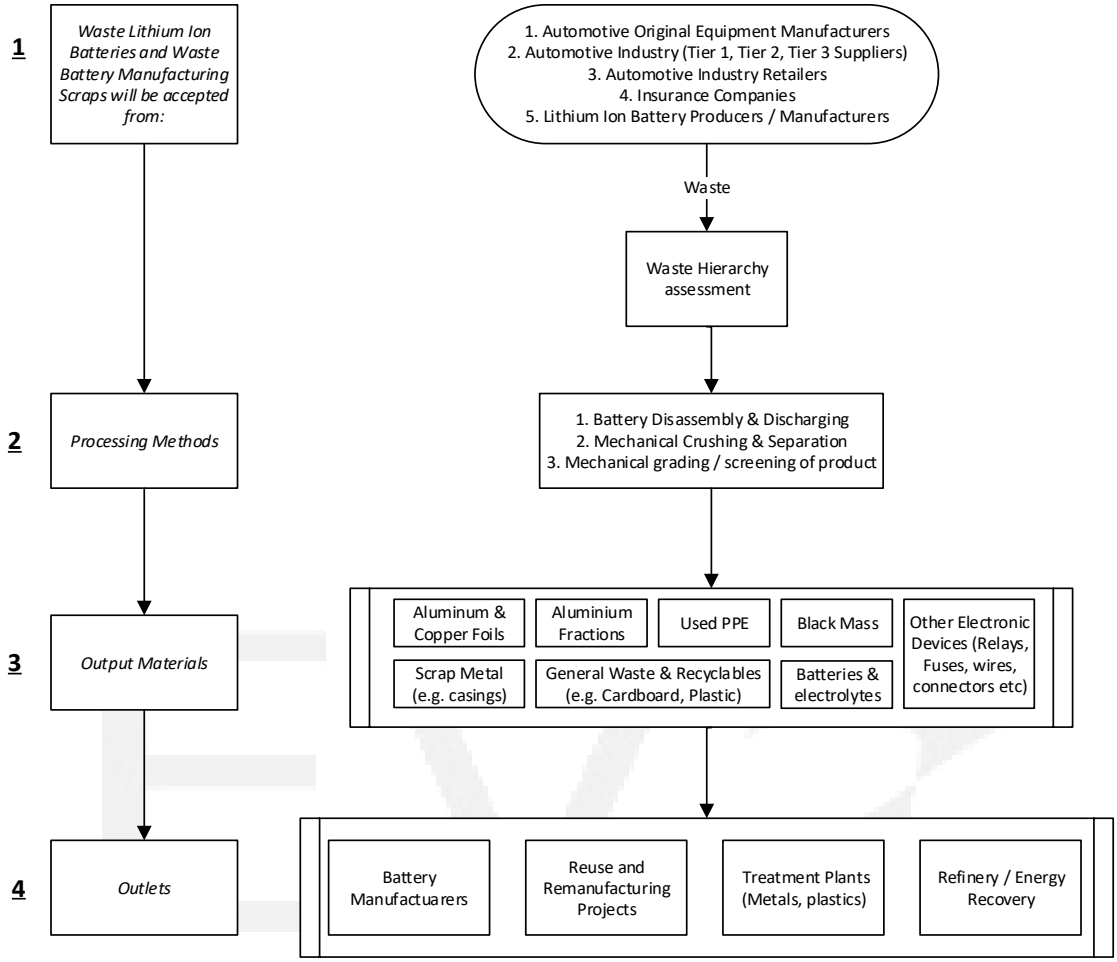
The key pieces of environmental legislation that affect the business are: **Note:** Ensure this list is kept up to date for the recycling site and covers all applicable legislation. Refer to the Company's internal Environmental Legislation Register	- The Environmental Permitting (England and Wales) Regulations 2016 - Environmental Protection Act 1990, section 33 & 34 - Environmental Protection (Duty of Care) Regulations 1991 - Hazardous Waste Regulations (England and Wales) 2005 - Recovery & Disposal Codes (EU Waste Framework Directives 2008) - The European Waste Code (EWC) Regulations - The Waste Framework Directive - The Waste Batteries and Accumulators Regulations 2009

Processes/Activities/Equipment at recycling site:
(insert H, M or L where applicable)
List all the processes/activities/ equipment at your site in these columns.

A - Emissions to Air (including dust)
W - Emissions to Water
E - Energy Usage (Electricity, gas, oil)
D - Waste Disposal
L - Land Contamination
N - Nuisance (i.e. noise or odour)
R - Resource Consumption (e.g. water)

Process/Activity/Equipment	A	W	E	D	L	N	R
Arrival of batteries on site	-	-	-	L	-	-	-
Storage	-	-	-	-	L	-	-
Visual Assessment	-	-	-	-	-	-	-
Electrical Assessment	-	-	M	-	-	-	-
Dismantling by hand	-	-	-	-	-	L	-
Separating by hand	-	-	-	L	-	L	-
Machine Crushing	L	-	M	-	-	M	-
Machine Separating/Screening	L	-	M	-	-	M	-
Materials handling	-	-	-	-	-	-	-

1.1. Non-Technical Summary



EV Recycling requires an Environmental Permit in order to carry out the recycling activities for electric vehicle lithium ion batteries & waste battery manufacturing scraps materials.

1. Batteries & battery materials are sourced from the industry. This includes OEM's, producers & manufacturers, and insurers. The size of the batteries can vary (e.g. packs, modules, cells and manufacturing scrap materials such as anode/cathode foils). Call-ins are not accepted; all types of proposed waste batteries and associated waste materials are assessed using a risk assessment and email communication with the customer *prior* to agreeing to accept the waste.

2. Upon arrival to the facility, batteries and battery materials are initially inspected, tested and categorised into product or waste depending on the potential for reuse/remanufacture (adhering to the waste hierarchy and end of waste regulations). Product is separated from waste at the earliest opportunity and shipped for reuse, repurpose and remanufacturing projects. Waste is stored at EV Recycling, prior to being processed using the dry crushing equipment. All waste batteries must be tested as safe for the crushing process, **prior** to entering the recycling/treatment area. This includes ensuring zero/minimal battery voltage and removing electrolyte. Dry scraps such as anode/cathode foils are stored in sealed containers and do not require any work to be ready for the dry crushing process. All batteries & battery material designated for recycling is processed in the recycling/treatment area at the earliest opportunity after arriving at the site.

For the purpose of the environmental permit, it is essential to state that all recycling activities use a 'dry-process'. A dry-process does not use pyro-metallurgical or hydrometallurgical processes to recycle the waste battery materials. The dry-process reduces the risk of potential environmental impacts via emissions to water, air and land. **Under normal operating conditions, the facility has zero emission points.** The Environmental Management System details these risks and associated response procedures in the following tables.

3. All waste batteries, battery materials and product/outputs are stored securely and separate from each other. All product is sampled and tested to ensure it meets the customer specifications. It is then labelled and shipped to the customer in sealed impermeable containers/bags. Any by-product is removed by approved carriers, following the Company's procedures.

4. Agreements are made with potential customers (e.g. product spec, quality, quantity, battery failure modes, etc.) before the logistics are arranged.

Table 2A. Emissions to Air

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 crushing processes	Local air quality/ flora & fauna	Yes - air filtration system. In addition, activities are carried out indoors	Yes – visually check air filtration system for signs of blockages or damage	Yes - reduce chances of dust through in house training on handling of materials & machinery operations	Yes	Dust levels are minimal
Recycled materials handling (product) – weighing and storage	Local air quality/ flora & fauna	Yes - air filtration system. In addition, activities are carried out indoors	Yes – visually check air filtration system for signs blockages or damage	Yes - reduce dust through proper materials handling any relevant machinery operations	Yes	Dust levels are minimal

Table 2B. Energy Usage

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
Electrical Assessment	General impacts of electricity production	No	Yes – Quarterly	Yes – Battery assessment procedure (IP)	Yes	Efficient use of machinery required to reduce the impact. Note: Machinery may not be in use every day.
Electricity usage for **separating** machinery	General impacts of electricity production	No	Yes – Quarterly	Yes – machinery operating guidance for each piece of equipment (IP)	Yes	Efficient use of machinery required to reduce the impact. Note: Machinery may not be in use every day
Electricity usage for **crushing** machinery	General impacts of electricity production	No	Yes – Quarterly	Yes – machinery operating guidance for each piece of equipment (IP)	Yes	Efficient use of machinery required to reduce the impact. Note: Machinery may not be in use every day

Table 2C. Waste Disposal

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
Batteries and battery material deliveries on site may be accompanied by unrecyclable materials from packaging (e.g. polystyrene, film plastics, etc.)	Non-biodegradable waste materials can cause harm to local flora/fauna if escapes to the environment	Fencing around the site helps to catch any material that escapes	Yes – weekly general site integrity checks (visual)	Suitable materials handling - All non-recyclable waste to be disposed of correctly	Yes	Local company to collect unrecyclable waste from site to be dealt with appropriately
Waste disposable PPE items contaminated with dust, produced by the recycling process	Non-biodegradable waste materials can cause harm to local flora/fauna if escapes to the environment	Fencing around the site helps to catch any material that escapes. All disposable PPE is contained in sealed bags & disposed via special waste collections	Yes – weekly general site integrity checks (visual)	Suitable materials handling – All waste to be disposed of correctly	Yes	Contaminated waste to be collected and disposed of by an approved waste carrier
Separating by hand	Non-biodegradable waste materials can cause harm to local flora/fauna if escapes to the environment	No	No	All non-recyclable waste to be disposed of correctly	Yes – Non recyclable materials to be put into an appropriate bin	Local company to collect unrecyclable waste from site to be dealt with appropriately

Table 2D. Land Contamination

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
Arrival of batteries and battery materials on-site could be accompanied with unrecyclable materials from packaging (e.g. polystyrene, film plastics, etc.)	Non-biodegradable waste materials can cause harm to local flora/fauna if escapes to the environment	Fencing around the site helps to catch any material that escapes	Yes – weekly general site integrity checks (visual)	Suitable materials handling - all non-recyclable waste to be disposed of correctly	Yes	Local company to collect unrecyclable waste from site to be dealt with appropriately

Table 2E. Noise

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 site activities (**crushing** machinery)	Local offices and nearby people could be affected by a lot of frequent noise/ vibrations	Activity is carried out indoors, and proper maintenance of equipment and machinery helps to limit any noise	Yes – Monthly checks (recorded during activities)	Yes – machinery operating guidance for each piece of equipment (IP)	Yes	Crushing machinery is not in use during sensitive times of the day (night time) and not every day of the week
Noise from site activities (**Separating** machinery)	Local offices and nearby people could be affected by a lot of frequent noise/ vibrations	Activity is carried out indoors, and proper maintenance of equipment and machinery helps to limit any noise	Yes – Monthly checks (recorded during activities)	Yes – machinery operating guidance for each piece of equipment (IP)	Yes	Crushing machinery is not in use during sensitive times of the day (night time) and not every day of the week
Noise from site activities **Dismantling manually**	Local offices and nearby people could be affected by a lot of frequent noise/ vibrations	Activity is carried out indoors	N/A	Yes – Safe Systems Of Work (IP)	Yes	Battery dismantling guidance (IP)
Noise from site activities **Separating** by hand	Local offices and nearby people could be affected by a lot of frequent noise/ vibrations	Activity is carried out indoors	N/A	Yes – Safe Systems Of Work (IP)	Yes	Manual materials separation guidance (IP)

Table 3. General Waste Management

Process/Activity/ Equipment on Site	Where does the waste go?	Can it go to recovery/ recycling?	Can it be stored correctly on site?	Are Duty of Care requirements being met?	Comments
General waste sent for disposal	Non-recyclable or non-recoverable materials are collected from site by local company to be dealt with appropriately	No	Yes – however the waste in question must comply with the permit and not an imminent environmental hazard	Yes	Ensure that the local company collecting the waste has the required certification, to ensure that the waste will be dealt with appropriately

Table 4. List of Procedures

Procedure Name	What process/ activity/equipment does it relate to?	Where is the procedure kept?	Version Number	Date of previous review?	Comments
Spill Response Procedure	Any activity which could cause a spill (materials handling, crushing, storage etc.)	Section 5.1 of the EMS	2	05/08/2024	
Flood Procedure	Generic	Section 5.2 of the EMS	2	05/08/2024	
Fire Procedure	Generic	Section 5.3 of the EMS	2	05/08/2024	
Utility Fail Procedure	Generic	Section 5.4 of the EMS	2	05/08/2024	
Pre-Acceptance Procedure	Initial customer discussions	Section 5.5 of the EMS	2	05/08/2024	
Acceptance Procedure	Delivery on-site	Section 5.6 of the EMS	2	05/08/2024	
Categorisation & Storage Procedure	Storage of battery cells & materials	Section 5.7 of the EMS	2	05/08/2024	
Treatment Procedure	Crushing & separating	Section 5.8 of the EMS	2	05/08/2024	
General Incident Procedure	Delivery on-site	Section 5.9 of the EMS	2	05/08/2024	

2. Accident/Pollution Incident Management Plan

The contents of this section of the Environmental Management System (EMS) include information on the following topics:

- Site Plan, including; entrances/exits, buildings, drainage plan, vulnerable receptors, recycling activities areas and materials/goods storage areas including hazardous waste (if applicable)
- Key Site & Emergency Contacts (Including site managers, emergency services, utility services and regulators)
- List of Substances and Storage Facilities
- Accident/Incident prevention and mitigation measures

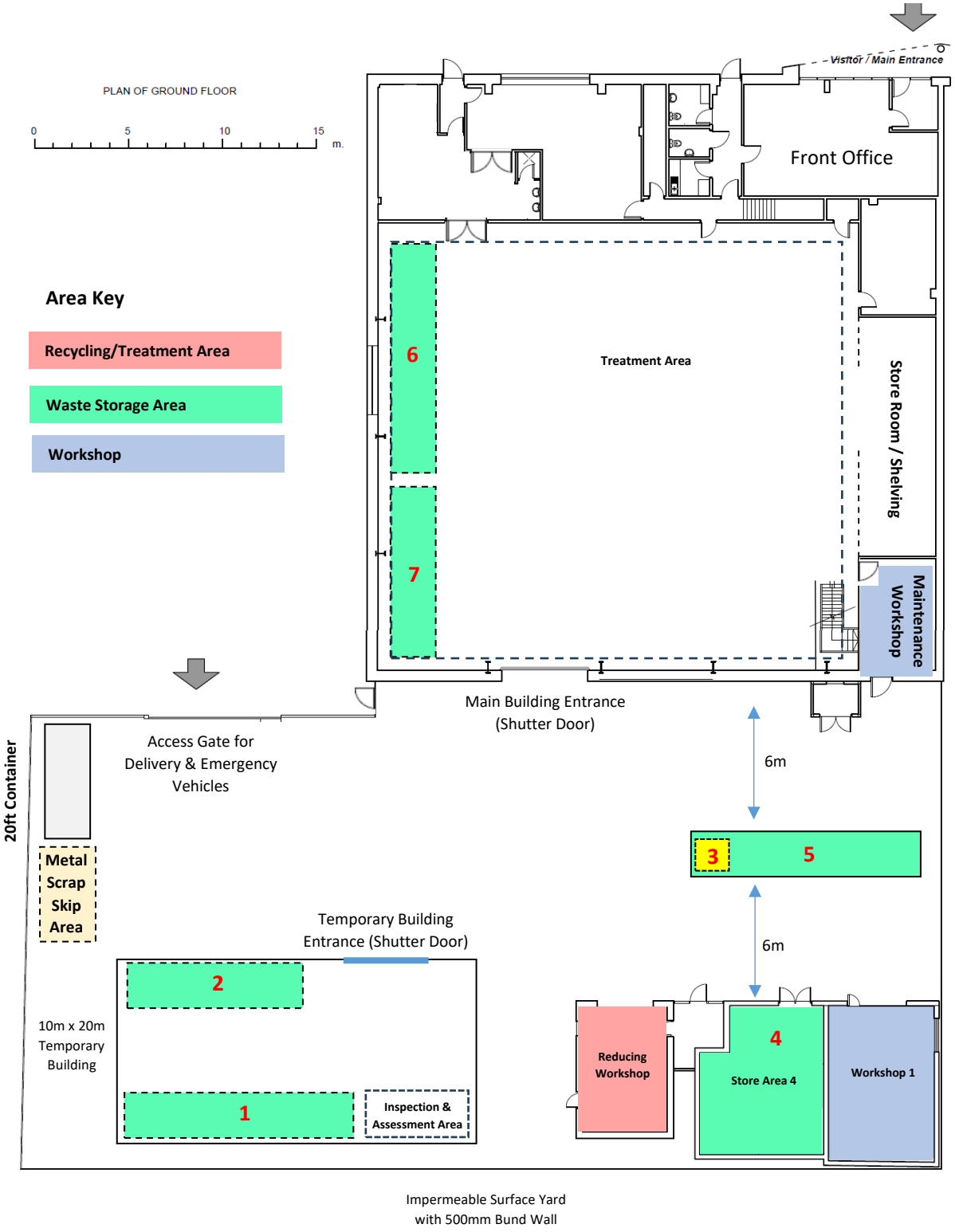
2.1. Site Plan

Site Address:

EV Recycling, Unit 12, Llanelli Gate, Dafen, Llanelli, Carmarthenshire, United Kingdom, SA14 8LQ

2.1.2. Storage Quantities, Area Sizes, Site Entrances, Exits and Recycling & Storage areas

The image below provides a general overview of the site, highlighting the key areas.
This will be provided to the fire services in the event of an emergency.

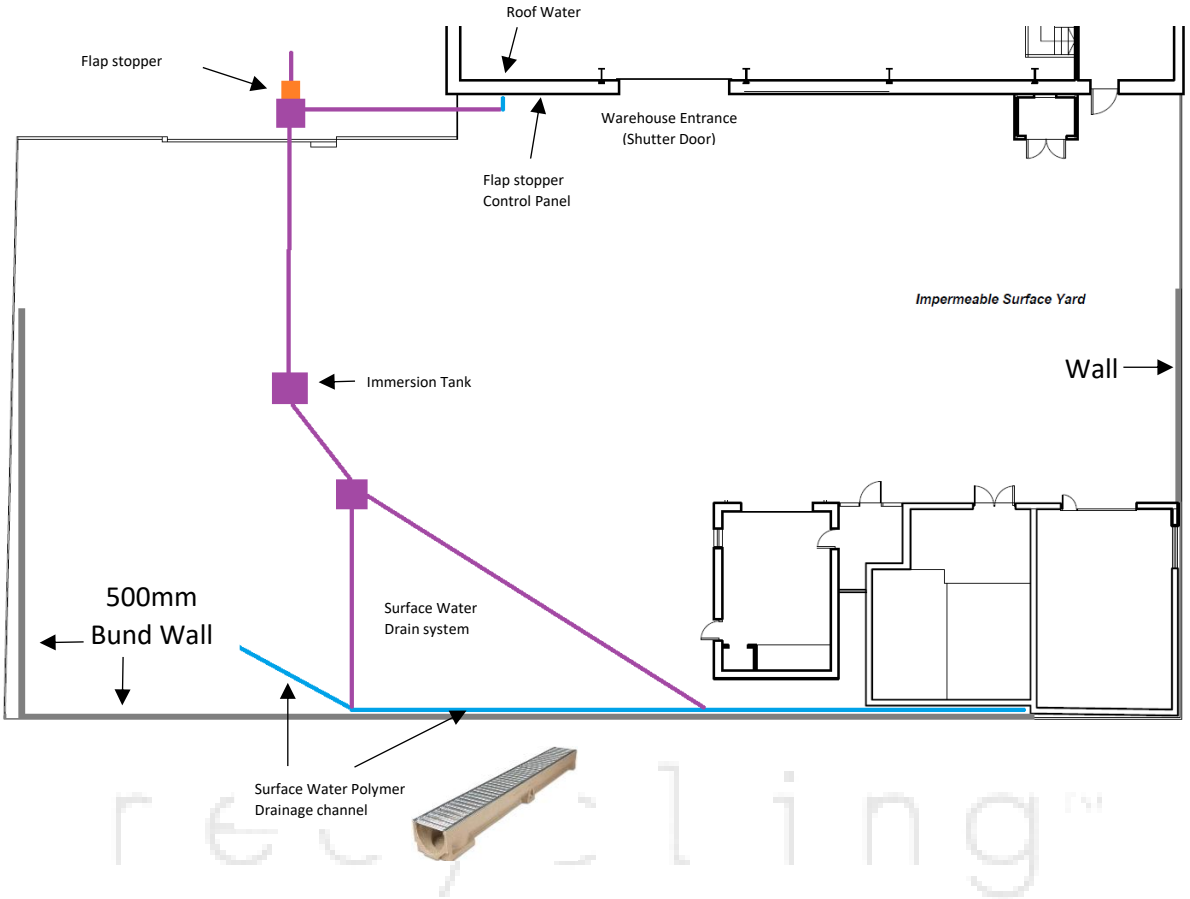


Waste Area	Type	Details and Waste Types	Size of Area (metres)	Maximum Height of Stack? (metres)	Maximum Capacity (Quantity)	Maximum Weight (kg)	Storage time
1	Potential for Hazardous (including Mirror Hazardous and mirror non-hazardous)	Processed and Unprocessed Waste, including CAT 2 & 3 batteries. Inside Approved Packaging (e.g. ADR if required) and/or on labelled pallets. Separated manufacturing scraps consisting of anode and cathode materials.	12 x 3.5	2.59	12 Packs/120 Modules OR battery anode & cathode scrap	24,000	Up to 6 Months
2	Potential for Hazardous (including Mirror Hazardous and mirror non-hazardous)	Processed and Unprocessed Waste, including CAT 2 & 3 batteries. Inside Approved Packaging (e.g. ADR if required) and/or on labelled pallets. Separated manufacturing scraps consisting of anode and cathode materials.	10 x 3	2.59	120 Modules OR battery anode & cathode scrap	24,000	Up to 6 Months
3	HAZARDOUS	Separately collected by-product electrolyte from processing activities. Stored inside plastic, chemically resistant barrels over bunding.	3 x 2.5	2	N/A	3,000	Up to 6 Months
4	Non-Hazardous	Processed and Unprocessed waste. Including CAT 2/CAT 3 batteries OR dry cells OR anode scrap material OR cathode scrap material.	5 x 4	3	20 tonnes of CAT 2 or CAT 3 batteries OR waste battery materials	20,000	Up to 6 Months
5	Potential for Hazardous (including Mirror Hazardous and mirror non-hazardous)	Flexible **Quarantine Area**/40ft. Processed and Unprocessed including CAT1/CAT2/CAT3 batteries.	9 x 2.5	2.59	9 Packs/100 Modules	21,000	48hrs, or as required for quarantined items
6	Potential for Hazardous (including Mirror Hazardous and mirror non-hazardous)	Processed and Unprocessed Waste, including CAT 2 & 3 batteries. Inside Approved Packaging (e.g. ADR if required) and/or on labelled pallets. Separated manufacturing scraps consisting of anode and cathode materials.	12 x 3.5	2.59	12 Packs/120 Modules OR battery anode & cathode scrap	24,000	Up to 6 Months
7	Potential for Hazardous (including Mirror Hazardous and mirror non-hazardous)	Processed and Unprocessed Waste, including CAT 2 & 3 batteries. Inside Approved Packaging (e.g. ADR if required) and/or on labelled pallets. Separated manufacturing scraps consisting of anode and cathode materials.	10 x 3	2.59	120 Modules OR battery anode & cathode scrap	24,000	Up to 6 Months
Total Waste Storage Capacity						**140,000**	
Total Waste Storage Capacity (Hazardous & Mirror-Hazardous Waste)						**50,000**	

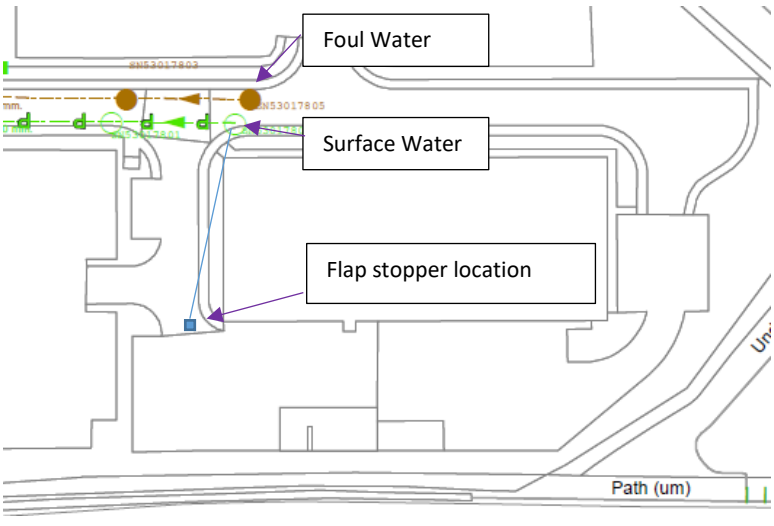
2.1.3. Drainage Plan

Below is a screenshot of the drainage plan. Please see the separate drainage plan documents for further detail. ***See Document 22. Drainage system documents V1.***

See Document 22. Drainage system documents V1.



All the surface water runs into the drainage system in the yard, into the immersion tank and past the open flap stopper device into the wider surface water drainage system offsite, as you can see in the image below.



Fire water discharge into the foul sewerage system is not permitted, due to the potential for contamination of local water courses.
The foul water does not merge into the surface water. Therefore the following measures have been implemented.

The site is bunded using a 500mm high concrete permitter wall with waterproof paint. This, along with an immersion tank and drain blocking flap (Flapstopper) device at the front of the main gate will be able to hold the fire water onsite and prevent any contaminants escaping to the drainage system.

The fire water and any contaminants can be removed from the immersion tank access point. The immersion tank and flapstopper device is serviced and inspected annually, and the flapstopper device tested on a monthly basis.

The use of a foldable flood water gate at the back of the site is not necessary, due to the use of a 500mm bunding wall. See section 6.12.

The metallic electro-pneumatically controlled flapstopper in the surface water drain can be operated remotely from a control panel. Once activated, this traps all fire water or any other accidental spills on site until a time when it can be pumped out. There is potential for automating the operation of the flapstopper by installing fluid sensors in the drainage system and linking it to the fire alarm panel.

The closest container to the control panel is 9m.

It is the responsibility of the fire marshal to activate the flapstopper device in the event of an emergency. The fire brigade will also have access to the control panel if required.

Below; Examples of a Spill kit and the flapstopper device situated within the drainage system.

2.1.4. Local or Nearby Receptors

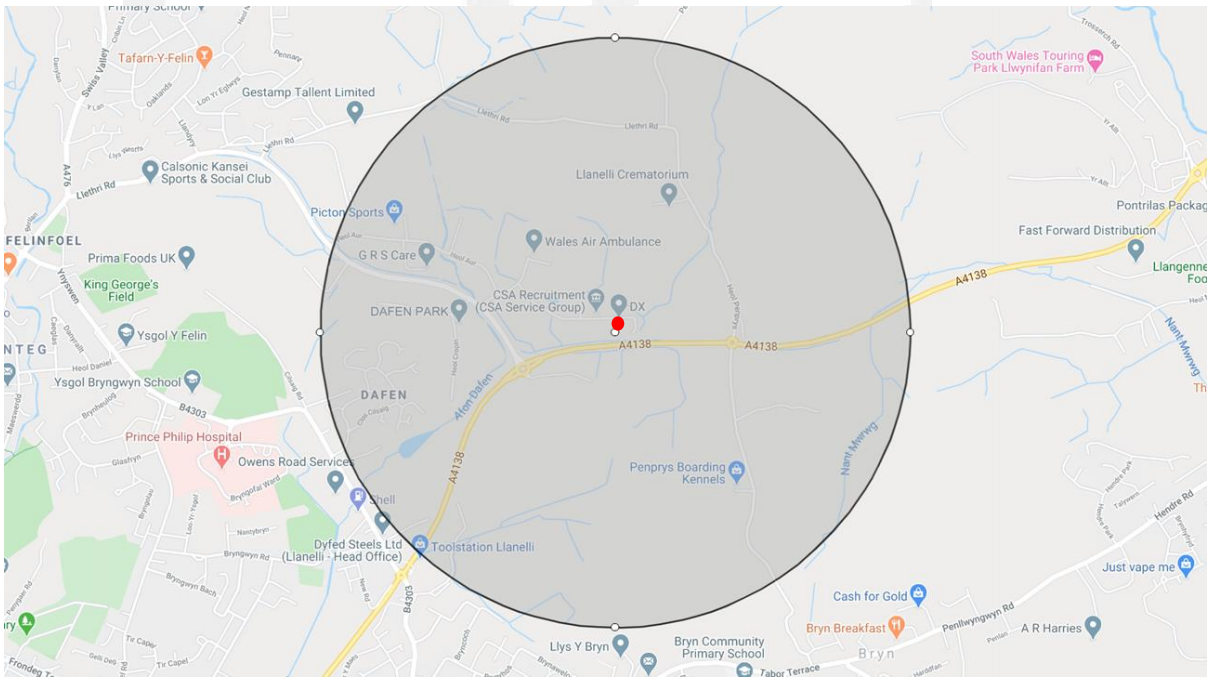
Groundsure
LOCATION INTELLIGENCE

4 Current Land Use Map

Current Land Use Legend

- Site Outline
- Search Buffers (m) 250 500
- Petrol & Fuel Sites
- Dangerous Substances (List 1)
- Dangerous Substances (List 2)
- Red List Discharge Consents
- Current Industrial Sites
- Part A(1) Authorised Processes and Historic IPC Authorisations
- Part A(2) and Part B Authorised Processes


Gestamp Tallent Limited
Llanelli Crematorium
Cwtchy Canines
Picton Sports
Wales Air Ambulance
G R S Care
CSA Recruitment (CSA Service Group)
DX
DAFEN PARK
A4138
DAFEN
Afon Dafen
Owens Road Service
Penprys Boarding Kennels
Nant Mwrwg
Dafen Cricket Club
Shell
Dyfed Steels Ltd (Llanelli - Head Office)
Toolstation Llanelli
B4303
Cash for Gold
Bryn Breakfast
Penllwyngwyn Rd
A R Harries
Llys Y Bryn
Bryn Community Primary School
Bryn
Tabor Terrace
Bryn Post Office
South Wales Touring Park Llwynifan Farm
Fast Forward Distrib


Tafarn-Y-Felin
Gestamp Tallent Limited
Calsonic Kansei Sports & Social Club
Llethri Rd
Llanelli Crematorium
Picton Sports
Wales Air Ambulance
G R S Care
FELINFOEL
Prima Foods UK
King George's Field
Ysgol Y Felin
Ysgol Bryngwyn School
CSA Recruitment (CSA Service Group)
DX
DAFEN PARK
A4138
DAFEN
Afon Dafen
B4303
Prince Philip Hospital
Owens Road Service
Shell
Dyfed Steels Ltd (Llanelli - Head Office)
Toolstation Llanelli
Penprys Boarding Kennels
Nant Mwrwg
South Wales Touring Park Llwynifan Farm
Fast Forward Distribution
Pontrilas Packag
Cash for Gold
Bryn Breakfast
Penllwyngwyn Rd
A R Harries
Just vape me
Llys Y Bryn
Bryn Community Primary School
Tabor Terrace

Immediate receptors - SA14 8LQ Dafen		
Name	**Address**	**Contact phone number**
DX Freight	Unit 13 Llanelli Gate	0843 509 2465
Caravan Storage Wales	Llanelli Gate Ind Est	01554 749991
Atcost Windows	Unit 10, Llanelli Gate	01554 750031
Storage Giant Llanelli	Unit 11 Llanelli Gate	01554 755799
DRL Partitions	Unit 1 Llanelli Gate	01554 754510
Treharne Automotive Engineering Ltd	Unit 8 Llanelli Gate	01554 775938
The Beacon Centre of Enterprise	Unit 5 Llanelli Gate	01267 246246
Wales Air Ambulance	Llanelli Gate Ty Elusen	0300 015 2999
Police Station	Llanelli Gate	01267 222020

Rest of the Industrial Estate - SA14 8LQ Dafen		
Name	**Address**	**Contact phone number**
Evans Safety Ltd	Unit C3, Llanelli Gate	0845 408 2354
CSA Recruitment	Llanelli Gate Business Park	01554 746746
Sonex3 Ltd	The Beacon	0330 100 3667
Toppers Wales Ltd	Unit D1 Llanelli Gate	01554 777501
Classic PVC	Unit5 Llanelli Gate	01554 777158
Cymru Autoglazing	Llanelli Gate Ind Est	01554 759041
GSF Motor Factors	Unit 4 Llanelli Gate	01554 775772
Marie Curie	Unit 2, Llanelli Gate	01554 759071
Cosmeditech	Unit 5, Llanelli Gate	0800 038 5580
GSF Car Parts	Unit 4, Llanelli Gate	01554 775772
Cymru Autoglazing	Llanelli Gate Ind Est	01554 759041
Morganstone Ltd	Llanelli Gate Ind Est	01554 779126

Nearby Industrial Estate (Heol Aur & Heol Cropin), Dafen Park, Dafen, Llanelli		
Name	**Address**	**Contact phone number**
British Red Cross Mobility Aids Service	Dafen Ind Est	01554 749374
Crest Trade Frames Ltd	Unit 1, Dafen Ind Est	01554 774571
Lockspot Self Storage	Heol Aur, Dafen Ind Est	01554 740066
Plantmax	Dafen Ind Est	07584 702517
Newgistics Freight Solutions Ltd	Unit 2, Dafen Ind Est	01554 740800
GEO Site & Testing Services Ltd	Unit 3, Dafen Ind Est	01554 784040
Picton Sports	Heol Aur, Dafen Ind Est	01554 754662
DPA Law Solicitors	Scarlet Court, Heol Aur	01554 749144
GRS Care Ltd	Scarlet Court, Heol Aur	01792 776238
Yodel	Unit 1, Dafen Park	01554 784912
Ambassador Windows Ltd	Unit 8, Dafen Park	01554 752144
Sgiliau Llanelli	Unit 5, Dafen Ind Est	01267 643345
Nixi Hair and Beauty Lounge Ltd	Unit 5, Dafen Ind Est	01554 897369

Teddingtons NDT	Unit 1, Heol Cropin	01554 744500
Ambassador Windows Ltd	Unit 8, Heol Cropin	01554 752144
Vaughan Sounds	3/4 Heol Rhosyn	01554 740500
Cwtchy Canines	Llethri Road Llanelli	07712 517417
J & A Construction	Gors Works Dafen Ind Est	01554 758767
Radnedge Reclaim Flooring	Dafen Inn Row	01554 755790
Commercial Marquee Hire Ltd	Unit 9, Dafen Ind Est	0800 612 6727
UK Auto Pro Moible Window Tint	Unit 2, Dafen Ind Est	01554 575038
Celtwood Carpentry & Joinery	Heol Cropin, Dafen Ind Est	07481 207484
Daniels Fans Ltd	Unit 7, Dafen Ind Est	01554 752148

Other Places within a 1Km range from the site		
Name	**Address**	**Contact phone number**
Gestamp Tallent Ltd	Plant Llethri Road	01554 772233
Thyssen Krupp Tallent	Llethri Road	
Penprys Boarding Kennels	Penprys Farm Bryn	01554 821574
	SA14 8BJ Llanelli	
Llanelli Crematorium	Penprys Road	01554 824137
	SA14 8BX Llanelli	
Sutherland Saddlery	Dafen Ind Park Roundabout	01554 746773
	SA14 9UU Dafen	
Dyfed Steels Ltd	Tube works Ind Est	01554 772255

In the event of a fire emergency, the fire marshal is responsible for contacting any immediate receptors, and then receptors within 1Km.

2.2. Key Site & Emergency Contacts

SITE DETAILS			
Location: EV Recycling Ltd., Unit 12, Llanelli Gate, Dafen, Llanelli, SA14 8LQ			
Post Code: SA14 8LQ			
Site Access Grid Reference: 253813, 201833			
SITE CONTACTS	Name	Office Hours	Out of hours
Owner:	ATC Wales	01554 775938	07736381801
General Manager:	James Bates	01554 775938	07828602730
Site Supervisor:	Michael Williams	01554 775938	07400513050
Production Supervisor:	Curtis Fraser	01554 775938	07395048534
Security Contact:	James Bates	01554 775938	07828602730
Landowner/Agent:	ATC	01554 775938	01543427900
EMERGENCY SERVICES		Office Hours	Out of hours
Emergency		999	999
Medical: Welsh Ambulance Services NHS Trust		01792 562900	999
Police: Felinfoel, Dafen and Swiss Valley		101	101
Fire: Llanelli Fire Station		0370 6060699	999
REGULATORS		Office Hours	Out of hours
Health and Safety Executive (HSE)		01554 775938	07773291424
Local Authority: Carmarthenshire County Council		01267 234567	01267 234567
Natural Resources Wales (Local)		0300 065 3000	0300 065 3000
EA (24 hour emergency hotline)		0800 80 70 60	0800 80 70 60
UTILITY SERVICES	Name	Office Hours	Out of hours
Water undertaker:	Welsh Water	0800 052 0130	0800 052 0130
Sewerage undertaker:	Welsh Water	0800 085 3968	0800 085 3968
Gas supplier:	SSE	01256 304244	n/a
Electricity supplier:	Haven Power	0800 052 0400	0800 052 0400

2.3. List of Waste Substances and Storage Facilities

The following is a list of waste materials that are stored on site and could have the potential to cause harm to the environment if they escape. **The quantities should be used as a guide only,** to show how much of each waste code and type could theoretically be stored on site at a given point in time.

- Total daily process/treatment capacity: **20 tonnes.** Daily process/treatment capacity for hazardous & mirror-hazardous waste: **10 tonnes.**
- The annual acceptance limit: **9000 tonnes.**
- The total waste storage capacity: **140 tonnes.** The storage capacity for hazardous and mirror-hazardous waste: **50 tonnes.**

List of Substances/Materials & Storage Facilities							
Material	**EWC Classification**	**European Waste Code (EWC)**	**Accepted On-Site?**	**Stored On-Site? (Post-Process)**	**Quantity (tonnes) Stored On-Site**	**Type & Size of Storage**	**Type & Size of Secondary Containment**
Lithium Ion Battery Cells, Modules & Packs	**AN (Absolutely Non-Hazardous)**	16 06 05 20 01 34	✓	✓	**95**	Raised shelving and/or on pallets/crates	Impermeable Surface & Bunded Area
Manufacturing Scraps (Lithium Ion Battery Cells & Modules, Cathode)	**MH (Mirror Hazardous)**	**16 03 03**	✓	✓	**15**	Raised shelving and/or on pallets/crates	Impermeable Surface & Bunded Area
Manufacturing Scraps (Cathode)	**MN (Mirror Non-Hazardous)**	16 03 04	✓	✓	**15**	Sealed container on pallets/crates	Impermeable Surface & Bunded Area
Manufacturing Scraps (Anode)	**MN (Mirror Non-Hazardous)**	16 03 04	✓	✓	**15**	Sealed container on pallets/crates	Impermeable Surface & Bunded Area
'Black Mass' (i.e. Nickel, Cobalt & Manganese Powder)	**MN (Mirror Non-Hazardous)**	Product	✗	✓	**20**	Sealed container on pallets/crates	Impermeable Surface & Bunded Area
Crushed Aluminium foils (i.e. Fractions)	**MN (Mirror Non-Hazardous)**	By-Product	✗	✓	**10**	Sealed container on pallets/crates	Impermeable Surface & Bunded Area
Miscellaneous (E.g. Scrap Metal Casings, Busbars)	**AN (Absolutely Non-Hazardous)**	By-Product	✗	✓	**7**	Skips/Scrap Metal Bins	Impermeable Surface & Bunded Area
Separately Collected Electrolyte	**AH (Absolutely Hazardous) ****	**16 06 06**	✗	✓	**3**	Sealed container	Impermeable Surface & Bunded Area

Note: The table above demonstrates that EV Recycling's activities and storage complies with **Annex III, Part A of Directive 2006/66/EC of the European Parliament and of the Council**.

2.4. Accident/Incident Prevention and Mitigation

Possible Accident/Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens?
2.4.1. Spillages			
Accidental spillage of material, dust or electrolyte solution during transfer, sorting, crushing and separation of waste material	Contamination of land and watercourses if able to reach the receptors	Verify all deliveries upon arrival to the site, to ensure they comply and satisfy the agreement with the customer. Inspect the condition of the delivery for any leaks or unknown fluids. Train the staff to handle material in a suitable manner in order to reduce the risk of any potential spills during activities	Follow the spill response procedure in section 5.1. It describes what to do in the event of a spill
Slow seepage of liquids from contaminated materials (such as battery coolant). Slow seepage can be less noticeable than 'spills'		Verify all deliveries upon arrival to the site, to ensure they comply and satisfy the agreement with the customer (for example, battery coolant is drained prior to delivery on site). Inspect the condition of the delivery for any leaks or unknown fluids. Store material on an impermeable surface, bunded off from the surroundings	

Possible Accident/Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens?
2.4.2. Failure or Damage to Plant or Equipment			
Damage to plant or equipment due to corrosion, ground movements and impacts with other machinery such as a forklift trucks	Contamination of land and watercourses if able to reach these receptors	Pre-use inspections and completion of weekly inspection checklist record Preventative maintenance regime	Follow the spill response procedure in section 5.1. It describes what to do in the event of a spill

Possible Accident/Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens?
2.4.3. Fire			
Fire	Smoke and air pollution Fire has potential to cause contamination of land and watercourses if able to reach these receptors	Separation of incompatible materials and of combustible materials and ignition sources Incorporation of fire breaks into site layout and containment of fire water on impermeable surface within a bunded area No smoking policy Maintain a tidy site and minimise stockpile of combustible materials Fire awareness training, fire alarm tests & fire drills	Fire procedure in section 5.3 describing what to do in the event of a fire, including details about fire alarms, exit routes and muster points, responsible personnel such as a fire warden and the location and use of emergency fire equipment such as extinguishers, hoses, sand bags and drain covers.

Possible Accident/Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens?
2.4.5. Flood			
Flooding of the site, which in the worst case could be caused by overflowing of watercourses, blocked drains, burst water main or use of fire water	Contamination of raw materials, buildings, land, drainage system, groundwater and watercourses	Maintenance of drains (e.g. removal of leaf litter) Safe location for storage of all materials - particularly if there are any hazardous materials. Use air-tight sealed containers for processed materials	Flood procedure in section 5.2 describing what to do in the event of a flood warning such as installation of barge boards, use of sand bags, movement or special protection of sensitive materials

Possible Accident/Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens?
2.4.6. Failure of Services			
Services failure; water, electricity, gas supply and of sewerage system Could also be caused by a utility supply being impacted and damaged by moving objects	Crushing and separating equipment not completing a process, which may lead to extra processing and therefore increase in potential for dust/air pollution (although this is likely to be minimal due to secondary containment methods)	Checks built into safe systems of work and weekly site integrity checks record	Utility supply failure procedure in section 5.4 describing what to do in the event of services supply failure, such as manual shut down of processing plant/equipment Contact local authorities if necessary Fire procedure if required

Possible Accident/Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens?
2.4.7. Failure of Containment			
Failure of containment facilities due to land movement, impact, corrosion, etc.	Contamination of land, drains, groundwater and watercourses if able to reach these receptors	Provision of secondary containment for hazardous substances Inspection of primary and secondary containment facilities and equipment Regular integrity testing and visual checks on site facilities and equipment	Spill response procedure as described in section **4.1**

Possible Accident/Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens?
2.4.8. Vandalism			
Unauthorised entry and tampering or malicious damage to property, plant and equipment. Fire due to an arson attack.	Contamination of land, drains, groundwater and watercourses Air pollution due to fire.	Secure gate and perimeter fence Site locked when unmanned and out-of-hours Plant, equipment and materials locked inside secure storage out of hours Security system including camera and recording facilities	Spill response procedure as described in Section 5.1 Contact local authorities Inspect all equipment for damage Inspect all materials on site for damage and/or contamination Report any suspicious behaviour or unusual objects to management and/or emergency services as required

3. Maintenance Checklist

Item requiring maintenance	How Often? (tick the appropriate box)					Where are maintenance instructions?	Notes:
	Day	Week	Month	Year	Years		
Crushing & Separating Machinery	✓	✓	✓	✓		Safe System Of Work daily pre-use checks (hard copy in maintenance workshop) Hard copy of instructions from supplier/internal guidance in the maintenance workshop All electronic copies are online	Daily, Weekly & monthly visual checks, annual service
Materials Storage Containers & Storage Area	✓	✓				Electronic copies & hard copy	Weekly visual check for damage & any potential breaches of the containment. Check that storage methods satisfy the Environmental Risk Assessment
PPE (Personal Protective Equipment)	✓	✓	✓	✓	✓	Safe System Of Work daily pre-use checks. Electronic copies & hard copy	Every time before and after use
General Site Integrity		✓				Electronic copies & hard copy	Weekly visual checks for signs of damage
Containers Integrity	✓					Electronic copies & hard copy	Daily visual checks for signs of damage
Flapstopper Control Panel	✓					Electronic copies & hard copy	Daily visual checks for any faults on the LEDs of the panel
Immersion tank			✓	✓		Electronic copies & hard copy	Yearly clearing if needed

All the checks are recorded through an electronic version or the hard copy version. The operator will complete the check list and save the copy on the server or in a checklist file.

4. Training Checklist

Job	Training Required (tick boxes to show who needs which training)												Comments
	Environmental Awareness				Maintenance/ Operations				Accidents and Emergency (Health & Safety)				
	EPOC	General Awareness	EMS	FPMP	HV Training	ISO 14001	Machinery Training	Flapstopper	First Aid	Spillage Training	General Awareness	Fire Marshal	
General Manager(s)	×	✓	✓	✓	✓	✓	×	✓	✓	✓	✓	✓	
Compliance Team	✓	✓	✓	✓	✓	✓	×	✓	✓	✓	✓	✓	
Engineering & Maintenance Team	✓	✓	×	×	✓	✓	✓	✓	✓	✓	✓	✓	
Operations Team	×	✓	×	×	×	×	✓	✓	✓	✓	✓	×	
Other Employees	×	✓	×	×	×	×	×	×	✓	×	✓	×	

Whenever the EMS or the FPMP are being altered, the employees need to be updated with the changes. As part of the Company's ISO 14001 accreditation, an internal audit schedule and documentation review schedule is in place to ensure personnel know where to find the information relevant to their role regarding Quality/Operations, Health & Safety and Environmental aspects. The impacts and aspects registers are also reviewed as part of the audit schedule.

5. Procedures

The relevant procedures are listed below.

5.1. Spill Response Procedure

Spill Response Procedure	
Step	**What to do if it happens?**
1	Ensure that the spill is contained to prevent escape into the environment
2	Identify the source of the spill, type of spill and, if possible, stop the spill at the source
3	Isolate the spillage using a spill kit and contain within an impermeable container on a bunded, impermeable surface
4	If the spill continues or cannot be contained and poses a significant risk to the environment, activate the flapstopper. Arrange for an authorised contractor to remove the contamination from the site
5	Clean up the spill using the relevant spill kit and clean-up equipment
6	Re-use or re-cycle the containment. If this is not possible, ensure it is disposed of responsibly as contaminated waste, adhering to the 'Duty of Care' regulations
7	If the spill liquid/material is unknown, (for example, an unknown leak from a potentially contaminated delivery), follow steps 1-4 and contact the customer to identify spill and, if in breach of permit, arrange for removal from the site using an approved waste carrier
8	If the incident cannot be resolved and there is risk of pollution to the environment – or a potential imminent risk to the environment - contact Natural Resources Wales at the earliest opportunity (legally within 24hrs, but ideally as soon as possible)
9	Complete the 'Spill Response Record' after a spill incident, complete conduct an incident report where required. Discuss improvements with the team and management as part of the company's efforts towards continual improvement

5.2. Flood Procedure

Flood Procedure	
Step	**What to do if it happens?**
1	In the event of a flood warning, prepare the site with defence measures; installation of sand bags, movement or extra protection of sensitive materials, and check that the drains are not blocked
2	In the event that the defence measures are overcome, ensure machinery is shut down and sensitive materials are correctly stored
3	Depending on the cause of the flood, contact the relevant authorities
4	If sensitive material escapes to the environment and poses a risk of pollution, contact Natural Resources Wales at the earliest opportunity (legally within 24hrs, but ideally as soon as possible)
5	Enter the incident into the accident book and conduct an incident report where required. Discuss improvements with the team and management as part of the company's efforts towards continual improvement.

5.3. Fire Procedure

Fire Procedure	
Step	**What to do if it happens?**
1	Follow measures to prevent fires, described in the Fire Prevention and Mitigation Plan
2	In the event of a fire occurring, the fire alarms will sound and personnel will exit the site and gather at the muster points. All personnel will be accounted for by the Fire Officer
3	Activate the Flapstopper valve located by the site entrance gate
4	Contact fire emergency services and then immediate receptors
5	If possible, use emergency fire equipment such as extinguishers, hoses and sand bags
6	Contact Natural Resources Wales to inform them of the incident and confirm where fire water is going according to the site drainage plan
7	After the fire has been extinguished, enter the incident into the accident book and if required complete an incident report. Discuss improvements with the team and management as part of the company's efforts towards continual improvement

5.4. Utility Failure Procedure

Utility Failure Procedure	
Step	**What to do if it happens?**
1	In the event of services supply failure, manually shut down the equipment to ensure it is switched to the OFF position (no power supply)
2	Secure the area to ensure that there is no potential for unprocessed or partially processed materials to escape to the environment
3	Contact utility supplier to inform them of the issue. Investigate when normal operations can resume
4	Monitor the battery status of the Flapstopper and replace if necessary
4	Fill out the accident book and if required complete an incident report

5.5. Pre-Acceptance Procedure

Pre-Acceptance Procedure	
Step	**In compliance with the Standard Technical Guidance (SGN) 5.06**
1	During the initial customer communications, the specific composition and quantity of waste is discussed and agreed upon prior to arranging delivery. These discussions include recording the waste information in an official document in order to assess the waste and ensure it is permitted to be accepted by the facility. (e.g. Waste Transfer Note and if required a Dangerous Goods Risk Assessment).
2	If a new or unfamiliar variant of the waste is being discussed (for example, a type of lithium ion battery with different composition, layouts or failure modes), a sample should be investigated in order to assess suitability prior to acceptance. For new customers, a site visit may also be required to ensure that waste is being handled properly and stored appropriately **(for example, all materials – including hazardous and non-hazardous materials – are stored in sealed containers and separated from each other in order to prevent potential contamination of waste and product).**
3	If all requirements are met, arrangements are made with the customer for delivery of the consignment of waste to the site. EV Recycling is able to offer assistance with logistics and packaging where required.
4	The pre-acceptance discussions are recorded and used for the waste tracking system and to assist with the acceptance of the consignment onto the site upon delivery.

5.6. Acceptance Procedure

Acceptance Procedure	
Step	**In compliance with the Standard Technical Guidance (SGN) 5.06**
1	Upon arrival of the consignment to the site, the transport vehicle is stopped in front of the gate ready for inspection. The necessary ID/paperwork checks are conducted to confirm the expected quantity and waste type (including Waste Transfer Note, ADR checklist and any other paperwork agreed with the customer such as packing lists). Prior to accepting the vehicle on-site, the operator must check if the vehicle is a hot load by answering the following question: Are there any active emissions of smoke or electric sparks/arcs from the area where the batteries or hazardous waste is being stored/transported? **If yes, inform the occupants of the vehicle and inform the emergency services immediately. Inform the fire marshal on site.** If the answer is no, and the paperwork checks/inspections have been conducted to a satisfactory standards, the operator instructs the vehicle to a suitable parking location and acceptance to the site/unloading commences. New deliveries are moved to the inspection/test area before being categorised and stored appropriately. Waste quantities are verified using weighing scales, & recorded using the relevant documentation.
2	Visual inspection: If there are indications on the batteries or **hazardous waste battery manufacturing scrap materials** of the following then they must enter quarantine for 48 hours. - Indications of explosion or fire taken place - Indication of loose components - Signs of leaked electrolyte - Cracks on the casing - Holes on the casing - Dents or scratches more than 4mm deep - High Voltage connections damaged - Insulated conductors exposed - Coolant leakage - Structural damage to sealed containers containing hazardous waste (e.g. battery manufacturing scraps).

3	The inspection dictates which category a battery is sorted into. The three categories are; CAT 1, CAT 2 or CAT 3. **CAT1: Safe battery, in good working order. Product.** The battery is cosmetically and functionally suitable for reuse or repurpose, adhering to the Waste Hierarchy. All product batteries are transported to the engineering site/storage facility for storage, reuse and repurposing projects as required. Product battery packs may be dismantled to module/stack level and discharged for easier handling and safer storage. **CAT2: Safe battery, but rework/repairs are required for reuse or repurposing.** The battery is classed as waste until rework is carried out, OR it is permanently waste and will enter the recycling/treatment process. Waste batteries are stored in the approved waste storage areas of the facility at EV Recycling. **CAT3: Potentially dangerous battery. Waste.** Signs of significant cosmetic or functional damage, such as fire damage. Stored in the quarantine container. The battery is made safe at the earliest opportunity and recycled/treated appropriately. Batteries are categorised inside the Inspection & Test Area, and then moved to the appropriate storage/treatment areas. Batteries are strictly prohibited from entering the recycling/treatment area until they have first been inspected and made safe (e.g. discharged). **All hazardous manufacturing scraps are classed and labelled as waste scraps. They are stored in the assigned waste storage areas until ready to be treated/processed.**
4	If the waste arrives without any documentation explaining what it is, or if the delivery includes waste that was not agreed on during the pre-acceptance procedure, then it will not be accepted on to the site. This satisfies the Duty of Care, waste regulations and environmental permit. Under these circumstances, EV Recycling has a duty to decline acceptance, prevent the delivery vehicle from entering the site and inform the customer of the issue.
5	After the waste has been verified, accepted and stored, the quantities are entered into the internal waste tracker by the authorised person. All documentation is kept as electronic copies and a hard copy. Documentation must be kept for records and audits. **Hazardous waste battery manufacturing scrap materials will be sampled periodically using XRF analysing equipment to ensure the composition of the material meets the agreed pre-acceptance criteria.**

5.6.1. Unexpected Waste

If unexpected waste mistakenly enters the site, it is first identified and then quarantined inside a sealed container where possible (e.g. 25L/50L barrels, or other secure packaging such as ADR crates). The sender of the waste will be contacted and an authorised contractor will be arranged to remove the unexpected waste as soon as practically possible. Typically, unexpected waste should not stay on site for more than 1 week.

5.6.2. Hot Loads

Hot Loads pose a risk when receiving waste. A visual inspection is carried out to confirm that there are no indications or signs of the following:

- Active emissions of smoke or electric sparks/arcs from where the batteries are.

This is recorded using the waste acceptance documentation by the authorised person.

If the transportation vehicle is located outside of the site when indications of fire/hot loads is observed, inform the occupants and the emergency services immediately. Ensure the fire marshal is also informed.

If the transportation vehicle is on site when indications of fire/hot loads is observed, inform the occupants and the emergency services immediately. Ensure the fire marshal is informed to initiate evacuation procedure as required, unless the fire is small and can be safely extinguished.

When there is a risk of thermal runaway from any batteries that are not securely contained, all personnel will be instructed to leave the area as soon as possible, the alarm is raised and facility is evacuated. It is the responsibility of the fire marshal to notify close by receptors as required.

5.7. Waste Storage Procedure

Waste Storage Procedure	
Step	**In compliance with the Standard Technical Guidance (SGN) 5.06**
1	Upon delivery and acceptance onto the site, the waste batteries and waste battery manufacturing scrap materials are inspected and transferred to the appropriate storage area without delay. The incoming waste is verified to confirm the expected quantities with the waste transfer note, and then recorded in the waste tracking system. **The internal waste tracking system and waste transfer note tracking system is updated for each delivery. This ensures that EV Recycling complies with the permitted capacity and treatment quantities stated in the permit for both hazardous and non-hazardous waste.** **All waste, including lithium ion batteries, anode and cathode manufacturing scrap materials, must be stored separately to each other in sealed containers to reduce the risk of contamination and potential fire.**
2	Ensure that the waste storage method satisfies the Environmental Risk Assessment of the site. (For example, separation and segregation of waste to control fire risk)
3	In the event that the waste is not able to be transferred to the normal storage area (due to unforeseen circumstances), then it should be contained in the most appropriate and suitable manner whilst satisfying the Environmental Risk Assessment and EMS. At the earliest opportunity, it must be moved to the correct storage area.
4	Regular, weekly inspections of the waste storage areas are carried out and recorded (for example, temperature monitoring for “hot spots” and visual inspections).

5.8. Catch Trays

Any catch trays which are used onside to capture spillages, must be emptied into sealed containers (do not mix different fluids), labelled, and stored suitably. An authorised waste carrier will be contacted to remove any contaminated waste including spillages/clean-up materials.

5.9. Treatment Procedure

Treatment Procedure	
Step	**In compliance with the Standard Technical Guidance (SGN) 5.06**
1	The treatment process commences when the operations team are briefed on the daily/weekly tasks. It is ensured that the relevant and approved Safe System Of Work (SSOW) is in place and understood by the operatives for the specific type of waste material by means of a briefing and/or pre-operations meeting. Waste batteries, manufacturing scraps or hazardous waste battery manufacturing scraps materials are then moved from the storage area(s) to either the dismantling stations or the reducing workshop. Visual inspection takes place to confirm the expecting waste type to be processed, there is no contamination prior to treatment and that any sealed containers have not been punctured/structurally damaged. Any batteries to be crushed are also subjected to a voltage discharge and drying process, and a final prove-safe test to ensure minimal voltage levels (as close to zero as possible).
2	All waste (including hazardous waste battery manufacturing scraps materials) is treated mechanically through a dry recycling process, using crushing and separating equipment. The equipment is designed to handle a wide range of battery materials safely. Different types of waste inputs/feedstocks are treated separately, in order to reduce the risk of product contamination as well as mitigating the fire risk. Recycling different types of waste separately is also beneficial for the output yield/quality of the product. **NO** Pyro metallurgical or Hydro metallurgical methods are used during the processing.
3	The dry recycling machinery is designed to separate the various components of the inputted materials into outputs. Electrolyte (if present) is condensed and collected separately during the process. The metallic components of the waste are crushed and sieved/graded into the output product Black Mass and by-product 'Fractions' (ie. crushed foils). Each batch is quality controlled and sealed to ensure the product satisfies the customer requirements.
4	Regular inspections and maintenance of the treatment equipment (crushing & separating machinery) is conducted and recorded by the operations team. Regular inspections of the outputted materials are conducted using XRF sampling equipment in order to ensure the outputted product is consistent and meets the expectations of EV Recycling and the customers. **The internal waste tracking system is updated to reflect waste that has been removed from storage and treated. This ensures that EV Recycling complies with the permitted waste storage capacities.**

5.10. Fire Watch Procedure – Hot Works

Fire Watch Procedure – Hot Works	
Step	**In compliance with the Standard Technical Guidance (SGN) 5.06**
1	After any hot works have been carried out, confirm the cancellation of the work document (if relevant).
2	Inspect the area for potential signs of fire, smoke or evidence of fire.
3	If the area is clear, the procedure is complete.
4	At the end of the day, another inspection must be completed of the hot works area.

5.11. End of Waste Procedure

End of Waste Procedure	
Step	**In compliance with the Standard Technical Guidance (SGN) 5.06**
1	**<u>"Waste" can become "Product" in one of the following ways:</u>** **1)** Waste is processed/recycled via the recycling/treatment processes. (e.g. black mass product is recovered and meets quality protocols, such as batch sample testing and quality control tests to customer specifications). **2)** Waste is tested through a case-by-case individual assessment. If it passes the inspection it can be re-categorised as product (e.g. a safe, working battery). **3)** Some waste material is a valuable commodity in its current state, without any rework or processing required. The waste hierarchy can be applied to prevent this material becoming waste (e.g. some manufacturing materials, such as anode, that meets the quality requirements of the customer). **The correct level of the waste hierarchy is applied by complying with the Government Guidance and End Of Waste Regulations.**
2	All product material will be moved off site as soon as practically possible in order to prevent mixing of waste/product. - Outputted, product material is permitted to be temporarily stored in a designated area of the temporary building, separate to any waste, before being packaged and transported offsite for further storage or delivered to a customer. - All product batteries must be stored in one of the designated storage areas, until they can be shipped (e.g. for repurposing/reuse). - **Product batteries are strictly prohibited inside the recycling/treatment area.**
3	Repeat steps 1-2 as necessary until all waste has been processed successfully.

Note: The main building is utilised for waste dismantling/treatment activities and waste storage. All waste is stored on an impermeable surface with bunding, and all waste activities are conducted indoors.

5.12. Flapstopper

Flapstopper Procedure	
Step	**In compliance with the Standard Technical Guidance (SGN) 5.06**
1	In case of a fire emergency or an accidental spill which poses a potential threat to the environment and/or significant pollution, actuate the flapstopper from the control panel on the wall in the yard, located near the gate.
2	After the site has been decontaminated and all the contaminated liquid/spillage has been removed from the site by an approved waste carrier, coordinate with the fire marshal and EPOC trained person(s) to inspect the site. If the condition of the site is suitable again for operations, the flapstopper can be opened.

On activation, OP1, the air compressor will start in order to close the valve; this will be audible for approximately 5 seconds. In addition the strobe beacon will also activate, and remain in its 'alarm' state until OP2 is carried out.
When activating the open sequence, OP2, again, the air compressor will run for approximately 5 seconds. There will be some air which exhausts; again, this will be audible. The strobe beacon will de-activate after the cycle is compete.

OP1 – Push and hold Red button to close valve(s)

OP2 – Push and Hold Green button to open valve(s)

OP3 – Turn (removable) Door Keys to open door

6. General Emergency Response Procedure

In the event of an emergency, follow the procedure below.

DO NOT put yourself at risk.

DO:

1. **Raise the alarm as soon as possible. Contact emergency services if required.**
2. **In the event of a major, uncontrollable incident, evacuate the premises and assemble at the Fire Assembly Point.**
3. **DO NOT approach a swollen battery or any batteries at risk of explosion. Raise the alarm.**
4. **For battery arcs/small fires, cover with a fire blanket and move to the quarantine area if safe to do so.**
5. **Any batteries that are dropped, impacted or exhibit potential for thermal runaway must be immediately moved to the quarantine area and monitored for 48hrs.**
6. **For small non-battery fires, use extinguishing media if trained to do so.**
7. **If first aid is required, summon immediate and appropriate response using the first aid kits. Contact an on-duty first aider if required.**
8. **In the event of a spillage (e.g. electrolyte), temporarily halt activities and follow the spill response procedure.**
9. **Inform management of the incident at the earliest opportunity.**
10. **Liaise with emergency services upon arrival where appropriate.**

In the event of a fire or other emergency, dial **999** and give the following information as required:

In the event of a Fire or emergency, dial **999** and give the following information:

- Address: **EV Recycling, Unit 12, Llanelli Gate, Dafen, Llanelli, United Kingdom, SA14 8LQ**
- Contact name(s): **James Bates or the on-duty Fire Marshal**
- Telephone number: **01554 775938**
- Ordnance Survey grid reference: **SN 53663 02001**
- Drainage board phone number: **0800 0520130**
- **Provide the site plan with the storage locations to the fire services (A copy is located in the main entrance/reception area).**

When calling for emergency support, remain calm, describe the nature of the incident and provide clear directions to the site. Always agree a suitable meeting point with the Emergency Services.

If possible, move any personnel, equipment or substances away from the danger area **WITHOUT** endangering anyone. Close all doors if you are able to **WITHOUT** endangering yourself/anyone else.

Provide the Fire and Rescue Service with details of the location of any hazardous materials (e.g. batteries, black mass, etc.) & any other information which will assist them in dealing with the incident. If possible, provide a copy of the site plan.

- Fire extinguishers located:

Entrance	type: **Foam**	**Conference Room**	type: **CO2**
Front Fire Exit	type: **CO2/Foam**	**Kitchens**	type: **Fire Blanket**
Electrical cupboard	type: **CO2**	**Mezzanine Floor**	type: **CO2/Powder**
Back Fire Exit	type: **CO2/Foam**	**First Floor Landing**	type: **Water/CO2**
Warehouse/workshops	type: **Powder/CO2/Lithium Ion Battery Extinguishers/Fire Blankets**		

- **Lithium Ion Batteries:** Located in the Outbuildings and Storage Containers.
- **Electricity isolation point(s) located:** Warehouse
- **Gas isolation point(s) located:** Externally within the gas meter housing.
- **Water isolation point(s) located:** In front of the main entrance.
- **Defibrillators:** Located in the Operations Room & Warehouse.
- **First Aid Kits:** Located near kitchens and any relevant areas of risk.

If you believe there is a pollution risk as a result of a spillage then the following procedure must be followed:

- Stop any further spillage and contain spillages whenever possible;
- Install the drain covers (if relevant)
- Call the relevant Environment Agency (EA/NIEA/SEPA/NRW) Emergency Helpline on **0800 80 70 60** and pass on information regarding type of spillage. They will require the same contact information as previously recorded.

In the event of a severe accident dial 999 and request an ambulance. Again, they will require the same contact information as previously recorded.

- For medical-related incidents that require first aiders, use the first aid trained personnel list displayed in the main entrance/reception.

The nearest minor casualty department is located: **Prince Philip Hospital, Llanelli** Tel: 01554 756567
The nearest major casualty department is located: **Morriston Hospital, Swansea** Tel: 01792 702222

Document Details:	
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