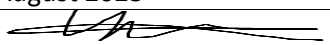
ENVIRONMENTAL FOCUS

Achieving Compliance & Quality

Environmental Management System

August 2025

Report compiled by:	Gareth Hill	Environmental Focus Ltd
Requirement:	EMS Update	Clydach Metals Ltd
Date of Submission:	August 2025	
Signature:		Gareth Hill
Version number and date:	V1	

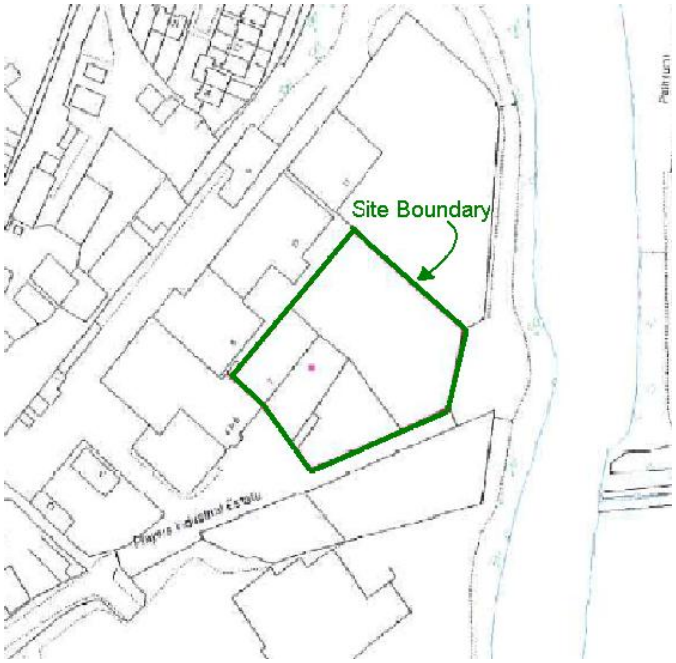
Introduction

The EMS produced for this site is designed to be only relevant for the activities being undertaken at the site named under the current permit, changes that are proposed to be undertaken in the future will be added to a consolidated version as and when required.

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

How to Comply, SGN5.06, WM3, H4, H1 and Fire Prevention and Mitigation guidance- waste.

The site is situated at:
Clydach Metals Ltd
Players Industrial Estate,
Clydach,
SA6 5BQ.



TCM

The TCM for the site is Environmental Consultant Gareth Hill, he has successfully completed the WAMITAB certificates for Transfer and Treatment of Hazardous and non-hazardous wastes (HROC6). Continuing Competence certification has also been achieved and submitted to NRW.

IED requirements

Due to the nature of the waste currently permitted, the wastes to be accepted at site and the treatment processes to occur; it is not foreseen that the IED is a relevant consideration for this facility. Should this change in the future due to amendments to the Legislation etc., Clydach Metals Ltd will address the requirements at this stage proactively.

R and D Codes

It is proposed that the R and D codes currently within the permitted activities table of the permit are sufficient for the activities being undertaken and detailed within this EMS:

Table S1.1 activities
Description of activities for waste operations
R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
R4: Recycling/reclamation of metals and metal compounds
R5: Recycling/reclamation of other inorganic compounds
D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

Site Infrastructure

The infrastructure across the site is currently all concreted and linked to a sealed drainage system that discharges through an engineered soak away system under the site. The depollution processes are undertaken in a building that is away from all other waste types. The building will be used for the storage and treatment of ELVs and the associated oils/fluids removed. These will be bulked up and removed from site when the storage tanks are full to allow for cost effective transportation. A second building is used for metal storage and treatment on a small scale and primarily hold the higher value material (copper etc). All wastes will be removed and taken to sites permitted to accept them.

The waste reception, treatment and storage areas are all fully enclosed by either the walls of the building or an 8ft fence line around the yard area.

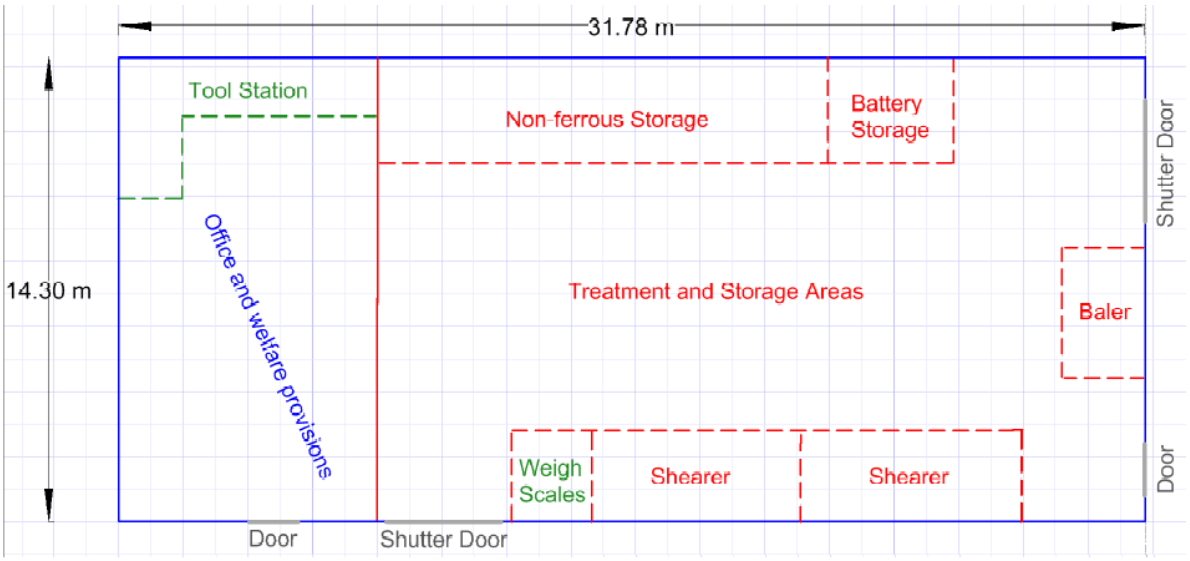
At present, the site yard area will be used for waste reception, treatment and storage (building for ELV treatment). The storage parameters will be identified within the attached FPMP for all waste types.

The site measures approximately 65m x 65m at its longest/widest part narrowing to the entrance and holds 2 buildings within it. The metal recycling building measures approximately 32m x 15m and the depollution building measures approximately 13m x 14m.

The metal recycling building will be used for the storage and treatment of mixed metal waste pending their recovery/recycling elsewhere. A dedicated waste reception area is located at the front of the building nearest to the door where small scale deliveries are accepted. The layout within this building stays relatively consistent and so is outlined below.

The depollution building is only to be used for the depollution process and the storage of those segregated wastes such as tyres, oils, batteries etc. Vehicles will be loaded into this area as and when space allows for it and the operator is ready for its acceptance.

Metal Recycling Building



The wastes will be segregated into different types and baled (if appropriate). The separated waste streams are likely to be ferrous and non-ferrous. These may be split between different types i.e baled ELV bodies will not be mixed with other metals of the same type etc but will largely be segregated as described. When enough of a tonnage is gained per type of waste, the materials will be baled and stacked in appropriate stockpiles until enough of a load is gained to make delivery commercially viable. However, not all wastes are baled, these will be stored separately and removed from site loose.

If any defects are found across the infrastructure of the site, these will be recorded within the site diary and appropriate action (remediation and repair work) will be taken to prevent any potential pollution events occurring. Repair work will aim to be completed within 5 working days of the initial defect report if a minor fault. If a more serious defect is noted, or one that would have a significant influence on daily operations, it may take longer to repair as planning will need to be undertaken to complete the task in the most effective way to allow business continuity.

Operational Procedures

The way in which the site is operated will be done in accordance with the conditions permitted in that mobile and stationary plant will be used to process the wastes permitted through bulking up, sorting and/or separating where required. The process on site will maintain a high turnaround of material to avoid unnecessary stockpile accumulation as this would hamper effective site operations and potentially result in environmental incidents/complaints.

The pre-acceptance, acceptance and rejection procedures adopted are detailed below and are in accordance with the Sector Guidance Note 5.06 section 2.1.1.

Site Operations

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

Pre-acceptance Procedures

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

A pre-acceptance screening procedure will be used to ensure that the wastes that are being proposed for delivery comply with firstly the requirements of the environmental permit held and secondly, whether the wastes are suitable to be recovered. This process will involve a review of information from the waste producer which may include representative samples of the waste being brought to site before bulk loading inputs. However, this is typically done off site at the place where the waste is produced and is undertaken by the company director.

All waste deposits to be utilised within the above-mentioned treatment process will therefore be pre-booked for acceptance to site where possible. Public drop off will be on an adhoc basis.

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

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

- How the waste was derived including any variability within the process (if relevant).
- The EWC code assigned for the waste.
- Chemical analysis (if required) and composition of the waste.
- Quantity of waste to be delivered.

- Any hazards within the waste.
- Contingency plans for non-conforming waste should the need arise.

It is not anticipated that wastes from companies outside of contracted agreements and public drop off are to be accepted initially, however, on occasion and as the business continues to develop, this may be acceptable if the waste meets the above pre-acceptance criteria. The wastes will still undergo full inspection and will be directed away from any source segregated materials avoiding cross contamination. These wastes will then be visually checked by the site management via on site checks before being incorporated into any further recovery projects.

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

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

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

Acceptance procedures

All wastes that are received are both visually checked when tipped off and as they are being sorted.

Duty of care paperwork is checked by the operative receiving the material to ensure that the waste is compliant with the EWCs on the permit of the site. It may be the case, as with some local authorities that a season ticket is used for wastes that are repeat loads i.e. CA site collections if applicable.

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

Due to the nature of the waste and how it is collected, there is inevitably going to be a certain amount of contamination in the waste. These wastes will be picked manually and held within a bin/skip on site and regularly removed to a site fully permitted to accept them.

Waste will then be stored on the appropriate area/surface awaiting the batching process.

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

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

A monthly and quarterly log is kept (for waste return purposes) of all waste that is accepted at site. This log is checked each month and this ensures that the permitted tonnage will not be breached. If

this figure is reached, then waste rejection procedures (detailed below) will be initiated to remain compliant on site.

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

Rejection procedures

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

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

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

Waste accepted

The wastes to be accepted under the permit, detailed within the Table S2.2 of the permit held are listed below:

Table S2.1 Permitted waste types and quantities for	
Maximum quantity	The total quantity of waste accepted at the site shall be less than 60,000 tonnes a year
Waste code	**Description**
02	**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 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,WIPING CLOTHS,FILTER MATERIALS AND PROTECTVE 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 03	End-of-life tyres
16 01 04	End- of -life vehicles*
16 01 06	End- of- life vehicles (containing neither liquids nor other hazardous components)
16 01 07	Oil filters*
16 01 12	Brake pads other than those mentioned in 16 01 11
16 01 17	Ferrous metal
16 01 18	Non-ferrous metal
16 02	Wastes from electrical and electronic equipment
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15
16 06	Batteries and accumulators
16 06 01	Lead batteries*
16 06 05	Other batteries and accumulators
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	Aluminum
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 THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**
19 01	Wastes from incineration or pyrolysis of waste

Table S2.1 Permitted waste types and quantities for	
Maximum quantity	The total quantity of waste accepted at the site shall be less than 60,000 tonnes a year
Waste code	**Description**
19 01 02	Ferrous materials removed from bottom ash
19 10	Wastes 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 34	Batteries and accumulators other than those mentioned in 20 01 33
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21,20 01 23 and 20 01 35
20 01 33	Lead batteries*
20 01 40	Metals

For any new/different wastes that are to be accepted onto site, an upstream audit will be carried out. This will ensure that the quality of the wastes remains the same as those that were witnessed in the initial pre-acceptance phase. The risk of accepting these new EWCs is not foreseen to increase for site if the correct processes identified within the site-specific risk assessment are maintained.

The quarantine area is a section of the site that also benefits from the required infrastructure under the permit held. It is located away from the rest of the waste and product material on site to avoid any potential cross contamination. Due to the waste acceptance procedures on site, it is not foreseen that more than 1 load of rejected material will be physically deposited on site and so the load will be able to fit in a small skip or wheelie bin. This will then be removed from site as soon as possible, the same or next working day.

The tipped material will be tested (if chemical contamination is suspected) and where appropriate, removed from site to a facility permitted to accept it within 10-15 days (this is to allow for sample analysis to be returned and to correctly classify the waste). If the contamination is physical or the EWC is not as described and so not permitted; this waste will be removed from site within 5 days and NRW will be notified of the acceptance. An internal investigation will be implemented to prevent this acceptance happening again.

If multiple loads are booked in from the same origin site and 1 load is deposited and subsequently rejected, no further loads will be deposited. All loads will be more closely monitored while still on the delivery trucks. If required, they will not be accepted at Clydach Metals and will therefore, be returned to the waste producer with the appropriate transfer notes.

Product storage

Processed materials will be stored within dedicated areas of the site. Regular collections will be booked in ensuring that waste volumes do not accumulate, this will be done out of necessity as the site is relatively small and the conditions will not allow for mass storage to occur. Despite the incoming waste being regular, the site will always do their best to ensure that the weekly input tonnage will be removed within the same week/month. This will maintain relatively low tonnages being held on site at any one time.

The storage of the waste will be in accordance with the Fire Prevention & Mitigation Plan guidance appended to this EMS.

Operating techniques

The materials once accepted must be handled in a way that is fully compliant with the requirements identified within the permit. Each waste type must under certain processes to remain compliant with the parameters identified within the permit held:

Limits of activities
Treatment consisting only of depollution of waste motor vehicles and sorting, separation, grading, baling, shearing, compacting, crushing or cutting of waste into different components for recovery.
There shall be no treatment of lead acid batteries.
Lead acid batteries shall be stored in containers with an impermeable, acid resistant base and a cover to prevent ingress of water.
Wastes shall be stored for no longer than 3 years prior to recovery
The maximum quantity of hazardous waste received at the site for disposal shall not exceed 10 tonnes per day.
The maximum quantity of hazardous waste stored at the site for disposal shall not exceed 10 tonnes per day.
No more than 50 tonnes of intact waste vehicle tyres (waste code 16 01 03) shall be stored at the site.
Waste types as specified in Table 2.1
All wastes must be treated on an impermeable surface with sealed drainage.

Treatment Procedures

The wastes will be tipped within the reception area for the waste type and will be processed through the site before being taken to the baler/bulked up and stored for onward recovery or disposal off site.

The site is currently permitted to accept up to 60,000T throughput per year of the permitted waste types.

The site is split into several processing/storage areas:

- Waste reception: The waste received on to site is unloaded in this area for inspection and processing. Within this area wastes are manually segregated into various materials. The materials will be separately stored depending on waste type and kept in dedicated areas pending onward recovery elsewhere. For example, all tyres will be stored away from other material so contamination of other wastes is reduced.
- Waste storage: The waste storage areas are designated zones where the storage of segregated materials are held pending onward processing. When the material is sufficient in volume to ensure economic transportation, they are removed from site and taken for onward recycling.

- Depollution: There are only 2 cars to be stored within the depollution bays at any one time. One vehicle will be processed/stored in each bay. Up to 30 vehicles awaiting the depollution process will be stored on the concrete surface outside.
- Liquid storage: all liquids associated with the depollution of vehicles will be stored in separate containers with appropriate secondary containment to prevent environmental harm.
- Batteries: all batteries will be stored in secure containers inside a building or outside, in sealed units.
- Gas cylinders: stored separately in a cool, well ventilated area in a dedicated cage.

WEEE storage/treatment (if undertaken) shall follow the following removal processes:

Table 2.4 Substances, preparations and components to be removed from separately collected WEEE

- Capacitors containing Polychlorinated biphenyls (PCB)
- Mercury-containing components, such as switches or backlighting lamps
- Batteries
- Printed circuit boards of mobile phones generally, and of other devices if the surface of the printed circuit board is greater than 10 square centimetres
- Toner cartridges, liquid and pasty, as well as colour toner
- Plastic containing brominated flame retardants
- Asbestos waste and components which contain asbestos
- Cathode ray tubes
- Chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC), or hydrocarbons (HC)
- Gas discharge lamps
- Liquid crystal displays (together with their casing where appropriate) of a surface greater than 100 square centimetres and all those back-lighted with gas discharge lamps
- External electric cables
- Components containing refractory ceramic fibres
- Components containing radioactive substances with the exception of components that are below the exemption thresholds set in Article 3 of and the Annex I to Council Directive 96/29/Euratom of 13 May 1996 laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation
- Electrolytic capacitors containing "substances of concern" (height > 25mm, diameter > 25 mm or proportionately similar volume)

Scrap metal treatment and storage

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

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

ELV depollution process

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

1. Treatment operations for depollution of end-of-life vehicles:
   - removal of batteries and liquefied gas tanks,
   - removal or neutralisation of potential explosive components, (e.g. air bags),
   - removal and separate collection and storage of fuel, motor oil, transmission oil, gearbox oil, hydraulic oil, cooling liquids, antifreeze, brake fluids, air-conditioning system fluids and any other fluid contained in the end-of-life vehicle, unless they are necessary for the re-use of the parts concerned,
   - removal, as far as feasible, of all components identified as containing mercury.

2. Treatment operations in order to promote recycling:
   - removal or catalysts,
   - removal of metal components containing copper, aluminium and magnesium if these metals are not segregated in the shredding process,
   - removal of tyres, glass and large plastic components (bumpers, dashboard, fluid containers, etc.), if these materials are not segregated in the shredding process in such a way that they can be effectively recycled as materials.

The suggested depollution process on site to be done when vehicle is grounded:

*Remove battery;

*Remove fuel filler cap and oil filler cap;

*Set heater to maximum;

*Remove wheels and tyres and separate balance weights;

*Remove any parts identified as containing mercury;

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

*Drain engine oil and remove oil filter for crushing or disposal;

*Drain transmission oil, including rear differential if applicable;

*De-gas air conditioning unit (if fitted) \;

*Drain coolant;

*Drain brake fluid;

*Remove catalyst (if fitted);

*Drain washer bottle;

*Drain brake/clutch reservoir(s);

*Drain power steering reservoir (if fitted);

*Drain fuel tank;

*Drain shock absorbers or remove suspension fluid;

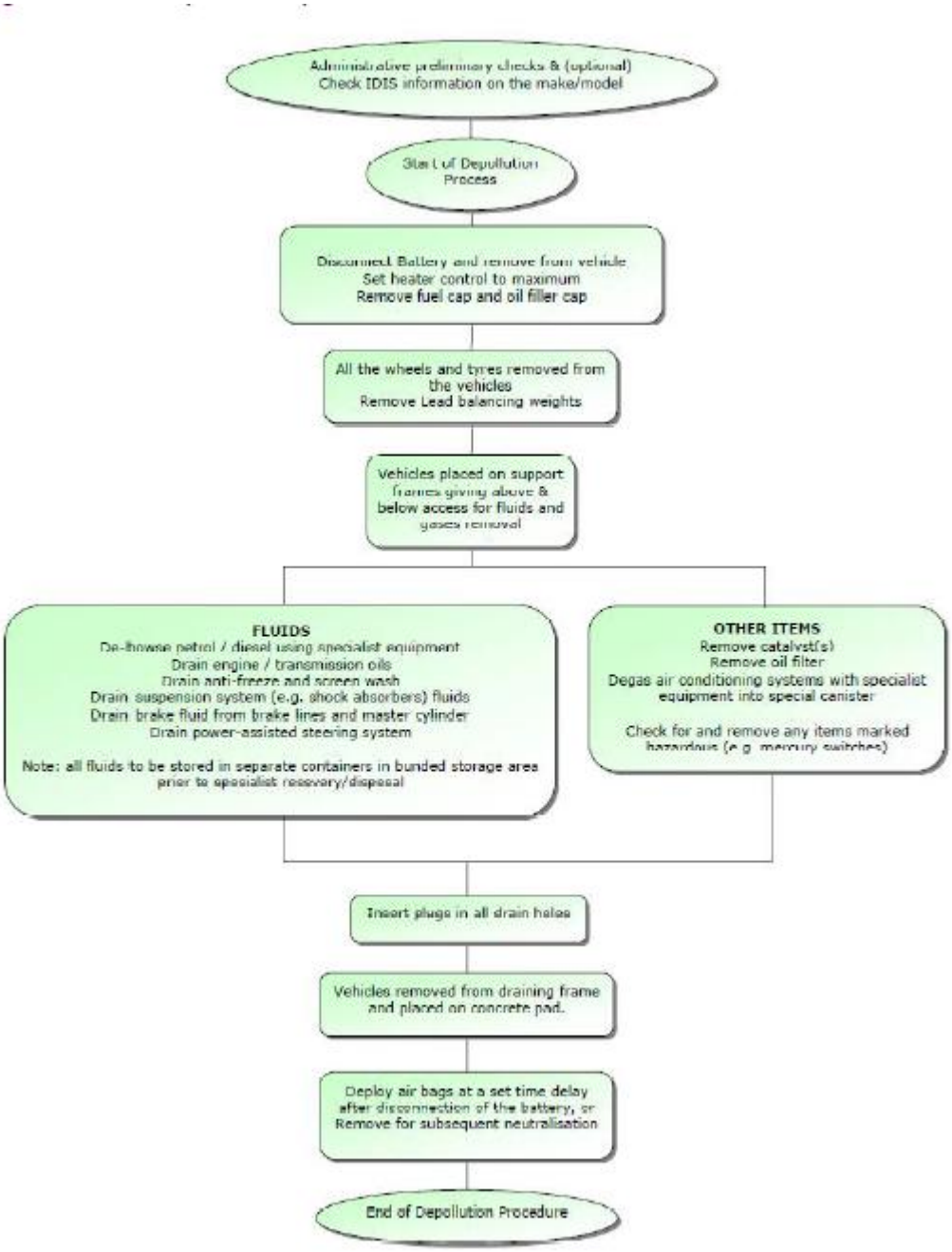
*Replace drain plugs/fit plastic stoppers;

*Remove vehicle from depollution frame or lifting device;

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

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

ELV Process Flow



Staff Training

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

Site Infrastructure and drainage

The site depollution building is not served by a sealed drainage system. The building is sealed and so any liquids that are created through spillage etc will not flow outside of the immediate area. All liquids created on site will be contained within the site boundary. Full spill kits are held within the building.

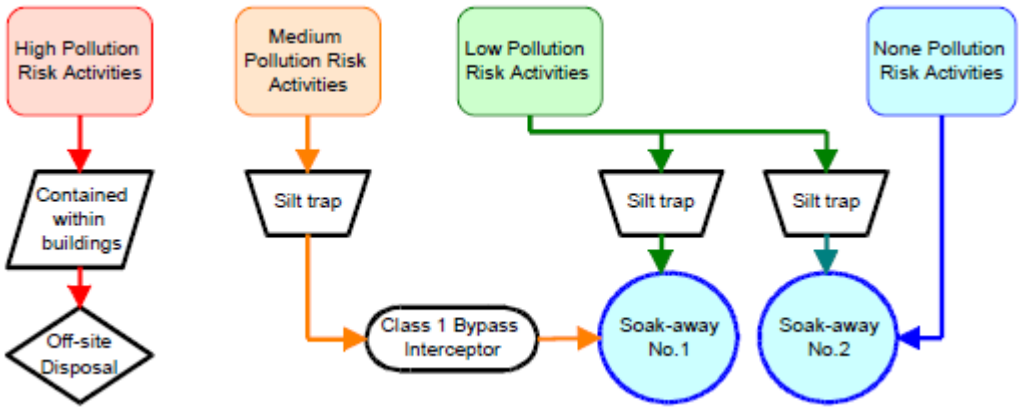
All clean water such as rainwater from roof tops etc are diverted away from the waste storage areas where possible.

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

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

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

Summary of the drainage plan



Fire on site

Fire prevention and mitigation measures are detailed in the supporting FPMP.

Accident Management

The processes to be followed in the case of an accident/incident on site are detailed below. Any incident response relating to a fire are detailed in the submitted FPMP.

Spillage risk management/procedure

All staff are to wear the required PPE to ensure work is carried out safely. Spill kits will be available on site for use by site personnel who will be fully trained in their administration. To minimise the risks of spills/leaks on site the following measures will be implemented:

- All waste fuels/oils will be stored appropriately with adequate secondary containment;
- Fuel deliveries will be undertaken via pre-booked arrangements and only when under direct supervision by the site supervisor;
- Any drums used will be held on a drip tray with adequate containment;
- Spill kits (or similar) will be held on site to ensure that an immediate response can be actioned in the event of a spill;
- Any spillages will be reported to NRW immediately;
- A full investigation will be undertaken to ensure that the incident is not repeated.

The following measures will be implemented in the unlikely event of a spillage on site:

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

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

Emissions and Monitoring

Generally, the emissions and monitoring of the site activities will be carried out daily as part of the management checks. Odour is not foreseen to be an issue due to the waste types currently accepted; however, an OMP will be created if the site receives numerous confirmed complaints of odour from either, members of staff or local receptors in a short space of time.

The actual level of noise created at the site is not anticipated to cause a nuisance beyond what the permitted boundary, the area is industrial/commercial in nature and does not create level beyond which are seen across the area.

The activities will typically only take place between the hours 07:30-18:30 Monday-Friday and 08:00-13:00 Saturday. These hours may vary if the level of work demands it but will always be sensitive to local people.

The site will maintain and service the plant in accordance with the manufacturer recommendations to help keep the machinery as quiet as possible and working effectively.

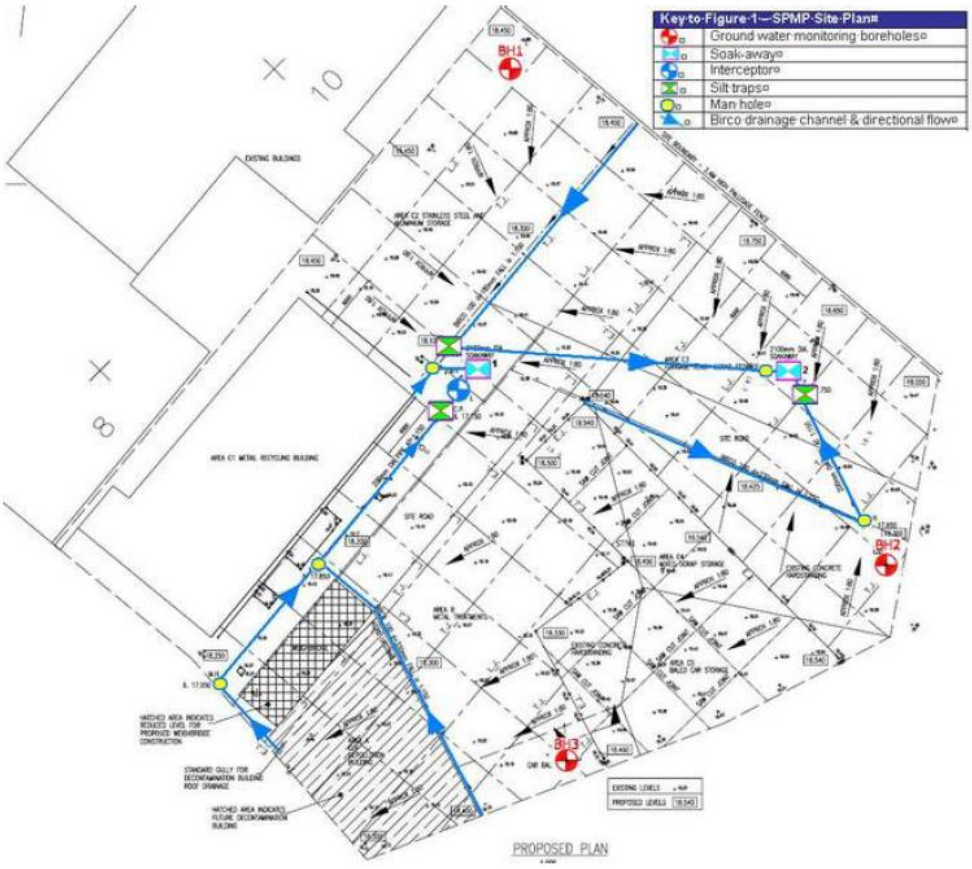
Mud, debris and dust will be managed appropriately, however, due to the nature of the waste and infrastructure, it is not foreseen that this type of occurrence will be problematic. To reduce the risk of dust on site minimising drop heights will be a normal working method. The yard surfaces will be swept regularly, vehicle movements will be minimised where possible. If required, water bowsers will be brought to site to dampen down any exposed surfaces.

Any loose wastes to be deposited and stored are not likely to be impacted by wind and so not subjected to environmental conditions that encourage wind-blown litter.

If complaints about noise and dust are received from outside of the permit boundary then an investigation will be initiated. This could include Frisbee monitoring for dust and a noise monitoring programme will be developed that incorporates monitoring of noise levels at several locations at different times of the operational day. This will enable Clydach Metals to identify any patterns in the complaints and noise levels and reduce them.

Groundwater monitoring will be monitored at each borehole every 6 months at each location identified on the plan below. BH1 is upstream of groundwater flow and BH2 and BH3 are downstream of the flow and site activity. The parameters tested will be as follows:

- pH
- Electrical conductivity
- Dissolved Organic Carbon
- Metals: As, B, Ba, Be, Cd, Cr, Cu, Pb, Hg, Ni, V, Zn, and Se,
- Inorganic chemicals: sulphate
- Total petroleum hydrocarbons
- BTEX – benzene, toluene, xylene and ethylbenzene
- Polyaromatic hydrocarbons
- Polychlorinated Biphenols (PCBs)
- Organo-lead compounds
- Chlorinated hydrocarbons



Plant and vehicle maintenance

Each item of plant and machinery used at site is visually inspected each day before the plant is operated. This includes maintaining equipment specifically to reduce noise levels, for example balancing fans and fixing loose covers. If any defects are noted, these are immediately reported to the plant manager and the defect is fixed either onsite, or if this is not possible, the plant is transported to a maintenance department. When not in use, the plant will be shut off to avoid any potential nuisance being caused by the turning over of the engines.

The plant and machinery are routinely fully serviced and maintained at required periods to ensure the effective and efficient operation of the site.

Site security and maintenance

As part of the daily site activities, the security fencing and general site infrastructure will be checked for integrity. The site is concreted and there are 2 buildings on site used for waste storage etc, the entire area being secured by metal fencing and lockable gates. There is an internal drainage system to be checked and oil interceptors/silt traps that require checking also.

If any defects are noted, they will be logged with the company director and senior management immediately and a programme of works will be initiated if the defects are found to be major and in need of urgent repair.

Emergency contact details will be available on the site identification board should they be needed after hours.

Complaints

There is a form dedicated in the Annex list to be completed by the competent person or director when reviewing the grounds for a complaint. The response time is 5 working days to all complaints unless otherwise requested by the operator. The operator notes that in the event of there being significant pollution it will advise NRW of the occurrence and any actions taken.

Records of any complaints investigated will be maintained at site for 3 years.

Annex List

External Complaint Form

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

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

Report Completed by:	
Date and Time:	

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

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