

The Environmental Permitting (England and Wales) Regulations 2016

INTELLIGENT LIFECYCLE SOLUTIONS LIMITED

**ENVIRONMENTAL MANAGEMENT SYSTEM
(EMS)**

APPLICATION FOR A BESPOKE PERMIT

**Intelligent Lifecycle Solutions
Unit 4 Dinas Islaf Industrial Estate
Williamstown
Tonypany
CF40 1NY**

Written By	Stephen Powell	Verified by:	Andrew Morgan
Page number:	1 of 50	Revision number:	2.3 – 06.01.2022
Issue date:	06.01.2022*	Re-assessment due:	06.01.2023

**Copies: Environmental Permitting Department
Natural Resources Wales**

Environmental Management System (EMS) Revision History

ISSUE	ISSUE DATE	ISSUE BY	SUMMARY
A001	15.07.2020	Stephen Powell	Initial Working Plan
A002	09.02.2021	Stephen Powell	Bespoke Permit Management Plan
A002.1	20.07.2021	Marco Muia & Stephen Powell	Revisions for submission to NRW
A002.2	03.11.2021	Marco Muia, Chris Parry & Stephen Powell	Revisions for submission to NRW
A002.3	06.01.2023	Marco Muia, Chris Parry & Stephen Powell	Revisions for submission to NRW

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1. General Site Detail

Intelligent Lifecycle Solutions Limited will be referred to as the (**The Site**) for the purposes of this plan.

The site address is:

Intelligent Lifecycle Solutions
Unit 4 Dinas Isaf Industrial Estate
Williamstown
Tonypandy
CF40 1NY

The National Grid Reference is **ST 00817 90005**

Introduction:

The Intelligent Lifecycle Solutions Limited WEEE Treatment Facility Limited serves the needs of corporate bodies who require that their Information Technology equipment is securely and safely erased of information. Some of this equipment is deemed to be waste at source and is therefore provided on the basis of the need for recycling in addition to the secure erasure of data and information.

This document is in the form of a management plan or EMS with the aim of providing clear process direction for treatment of that waste. The plan includes aspects of environmental risk assessment and control and, as such, has a secondary use within the certified ISO 14001:2015 Environmental Management System employed by the business. will be regulated as a Bespoke Permit (which will replace the current T11 exemption) for treatment of Waste Electrical and Electronic Equipment (WEEE). All site operations (including Waste Electric and Electronic Equipment Treatment and Electric and Electronic Equipment grading, bulking etc.) is undertaken within the fully enclosed built Facility. The treatment regime involves the manual separation of component parts from incoming material wastes outputs arising from the deconstruction of WEEE items comprise the following:

- Hard Disk Drives (HDD's)
- Plastics
- Ferrous and Non-ferrous Metals
- Printed Circuit Boards

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Hard Disk Drives may be subjected to a secure data sanitation process prior to sale for reuse.

Site Description:

The small industrial estate at Dinas Isaf (East) comprises three similar industrial factory/warehouse units formed on a common access road on the west side of the hill known as Dinas Isaf.

The premises are situated at the end of the common access road and have been bounded on all sides by security palisade fencing to a height of 2.4 metres. Access to the site is through either the secured HGV access or to the car park at the West side of the building.

The building itself is a reasonably modern in style factory unit that has been extended, to the North East with additional warehouse capacity, and refurbished. Previous occupants were Moulded Foams Limited who vacated the site in about 2011. This building is surrounded by a tarmac or concreted area set aside as access road, hard standing, loading bay and car park for staff and visitors.

The site has one immediate neighbour in TechniGlass Ltd who have a 24-hour operation in the manufacture of glass and glazing products. It would appear that this business has an active approach to noise reduction "out of hours" if the signs and notice posted in the approach road are a reflection of their policy.

Residential properties are some 100 metres or so above (up the slopes of Dinas Isaf) the site to the North East at Heol Glannant in Edmondstown.

To the West and South West the site is bordered, down a steep incline, by the A4119 following the valley floor and linking Cardiff with Tonypany in the Rhondda.

It is clear that with the immediate local area including similar light industry and business areas, the particular impact of the Intelligent Lifecycle Solutions Limited's operation will be minimal. Residential areas are not adjoining the site and the presence of the A4119 Road is likely to have far more impact than any traffic or operational aspects derived from the site itself.

By reference to the Natural Resources website there are no indications of flooding though the drainage culvert and small stream running from the North East of the site to an outfall on the South West could provide local water damage in unfavourable conditions.

There are no emissions to air and water from this manual Demanufacturing process.

Hours of operation:

Monday to Friday: 06.00 to 18.00
Saturday and Sunday: 06.00 to 12.00

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Appendix K - Site Inspection, Training and Monitoring Forms

2. RHOS TONYREFAIL SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)

It has been identified that there is a Site of Special Scientific Interest at Rhos Tonyrefail which is a large lowland site, consisting of a network of seven groups of fields around Tonyrefail, of special interest for its marshy grassland, acid flush, species-rich neutral grassland, acid grassland, wet heath and blanket mire. These habitats are associated with areas of woodland. The site is also of special interest for its population of marsh fritillary butterfly. National Grid Reference: ST005895, ST020875 and ST020890.

At the closest point to the East and East North East of the premises at a distance of approximately 94 metres. This is down a steep wooded bank towards the factory from the SSSI - a fall of approximately 15 metres or so. A further group of fields exists to the South and South - Site West, across the A4119.

The Bespoke Permit Risk Assessment, adapted from the standard rules risk assessment developed by the Environment Agency, Appendix H of this document establishes a "Low" risk to Sites of Special Scientific Interest arising from WEEE Treatment Operations.

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There is a comprehensive Health & Safety system certified to ISO 45001:2018 operational across the whole site that includes risk assessment, accident investigation and near miss reporting. This system is operated by a full time Compliance Manager and in co-operation with a proactive site safety committee. These arrangements are audited regularly, for Legal Compliance.

In addition to the preparation of a Fire Prevention and Mitigation Plan, which has been submitted with the application, it should be noted that there are no point source or significant diffuse emissions from the proposed operations and that the site has successfully operated to date under a T11 exemption. No dusty or odorous wastes are accepted at the site. The fact that the SSSI is at a higher elevation than the site and that emissions from the process are negligible effectively reduces the risk to the SSSI to very low, although it has been maintained as low to ensure that inspection and monitoring is able to confirm the very low status. The site inspection forms are attached as Appendix K, including staff training.

MP 1.0 Specified Waste Management Operations:

The site receives separately collected WEEE in the form of waste set top boxes, computer, office and communications equipment. This specifically excludes refrigeration equipment and fluorescent lighting. Section 1.2 below identifies the categories of waste to be accepted on

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site.

Transport:

Suitable collection methods will be used to transport Waste Equipment to and from client sites - these will be of the form of retail roll cages or pallets or similar. All transport of waste will be by appropriately registered waste carriers.

Inbound and outbound logistics will be performed by a variety of vehicles including box type vans and articulated lorries. Daily movements are likely to be:

Vehicle Type	Inbound		Outbound	
	Average	Maximum	Average	Maximum
Goods	3	6	2	6
Passenger (Employees & Visitors)	20	30	20	30

Goods Received:

Upon receipt, the appropriate documentation exchange will take place in line with the Transfer of Waste Regulations. The weight of Goods Received will be assessed and recorded and then the priority will be to identify WEEE capable of being re-used, i.e. suitable for refurbishment, this will be selectively removed and handled with appropriate care. All other WEEE will be separated into appropriate equipment categories destined to be treated and recycled. The recycling and treatment team will undertake this assessment.

Permitted Wastes:

The total volume of permitted wastes is likely to be very low in the region of 2500 tonnes p.a. and shall be from the categories set out below:

EWC Code	Description
15 01 06	mixed packaging (packaging waste associated with incoming WEEE only)
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	hazardous components removed from discarded equipment
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06 01*	Lead acid batteries
16 06 02*	Ni-Cd Batteries
16 06 05	Other batteries and accumulators
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries

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20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

Please note that this list is less than would be permitted under SR 2008 no. 23.

The activities on the site will be those consistent with the storage, re-use and treatment of WEEE particularly against the criterion for a Bespoke Permit Authorisation for a “Waste Electrical and Electronic Equipment Authorised Treatment Facility (ATF) excluding Ozone-Depleting Substances” and are set out in the table below:

Code	Description
R13	Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
R3	Recycling/reclamation of organic substances which are not used as solvents
R4	Recycling/reclamation of metals and metal compounds
R5	Recycling/reclamation of other inorganic materials

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MP I.1 Summary of Waste Treatment Process:

The treatment of waste electrical and electronic equipment consisting of the following primary processes:

- Testing of Hard Disk Drives (HDD).
- HDD Secure Data Sanitation.
- Pre- Manual dismantling of components if required.
- Separation of components using manual separation techniques.
- Sorting by size and material type (ferrous, non-ferrous, plastic, circuit boards and other).
- Hand picking of both hazardous and high value components.
- Separation of ferrous metal.
- Separation of non-ferrous metals.
- Separation of plastics.
- Recovery of HDD for reuse.
- Recovery of RAM for reuse.
- Recovery of mother circuit boards for reuse.
- Compaction of cardboard and plastic packaging for recycling.

In summary, treatment operations at the site will include:

- Sorting, dismantling, separation, baling, compacting, repair or refurbishment, or cutting of waste into different components for recovery.
- There shall be no treatment of WEEE containing ozone depleting substances.
- The maximum quantity of hazardous waste treated for disposal or recovery activity shall not exceed 10 tonnes per day. This does not include the manual sorting, manual dismantling, repair or refurbishment of WEEE.
- Wastes shall be stored for no longer than 1 year prior to disposal or 3 years prior to recovery.
- The maximum quantity of hazardous waste stored at the site shall not exceed 50 tonnes. This does not include WEEE awaiting manual sorting, manual dismantling, repair or refurbishment.

MP1.2 Summary of Waste Management Operations:

All operations will be carried out with the intention of protecting the health and safety of site personnel and others on site and to protect the environment and to minimise the effect of the operations upon the local amenity.

The treatment of WEEE, within this or any subsequent specialist treatment facility, will meet the requirements of the WEEE Legislation and adhere to the guidance issued by Natural Resources Wales in respect of the Best Available Techniques.

This Management Plan, plus any additional requirements of the Bespoke Permit Authorisation, will be strictly adhered to, as will all other statutory waste management requirements such as the Duty of Care, Registration of Waste Carriers etc., as they apply to the site operations.

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The following waste management operations are undertaken for the testing of discarded electrical and electronic equipment:

- Receipt of small domestic appliances.
- Storage of small domestic appliances.
- Selection and sale onsite of PC Desktop and Laptop appliances that are suitable for repair and refurbishment.

The following waste management operations are undertaken in the recycling of waste electrical and electronic equipment:

- Receipt of WEEE.
- Storage of WEEE,
- Manual separation (using hand tools only) of WEEE into components and materials.
- Temporary storage of recyclate pending collection for further recycling by third party or controlled disposal.
- Collection, grading and storage of printed circuit boards prior to dispatch to an approved copper and precious metals refiner.
- Maintenance of waste transfer records

WEEE Acceptance, Procedures and Control Systems:

Acceptance procedures will be in place to assess and record loads and these are described as follows:

- Incoming vehicles must report to the goods inwards bay for WEEE. For one off delivery the Duty of Care transfer notes (if WEEE is not from the end user) will be scrutinised to ensure that the source conforms to the schedules. Other regular suppliers will be validated against 'season ticket' arrangements.
- Loads will be visibly checked and then the weight would be assessed. All deliveries will be relatively clean waste electronic and electrical products and may be unloaded safely at the goods inwards sector.
- Any unwanted 'suspect' products or contaminated materials will either be loaded back onto the vehicle or removed carefully and placed in an isolated container for further scrutiny or appropriate disposal. The advice of NRW may be sought over any such delivery and a record made in the site records.
- Approved WEEE will be separated into its appropriate categories and dispatched to intermediate storage prior to entering the relevant process.
- Following the relevant individual category processes all material streams and components will then be bulked up depending upon the categorisation, destination, and qualities.
- Components which may have significant hazardous contents (lead acid batteries) will be stored in clearly identified leak proof containers on an impermeable concrete surface with sealed drainage inside the building prior to dispatch to a specialized contractor for disposal or recovery.
- All materials, components and residual waste leaving the site for further treatment, disposal or recovery will be properly described in accordance with the Duty of Care

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and transported by a Registered Waste Carrier to an authorised facility.

- All records of delivery and dispatch, including copies of Duty of Care Transfer Notes and Hazardous Waste Consignment Notes, will be maintained and available for inspection by Natural Resources Wales.

Process Flows:

IT Equipment (excluding monitors containing Cathode Ray Tubes) Products will be segregated by type and, if appropriate, tested for electrical safety. Functional testing and, if appropriate, data erasure will follow that may lead to essential repairs or refurbishment. Finally, products are cleaned and further segregated for re-marketing or redeployment. At this stage viable products are considered to be non-waste and are stored pending sale or re-use.

Power supply and other external cables will be removed and transferred to a storage container for subsequent bulking up. The equipment carcass will be opened (if appropriate) and any components or materials (such as circuit boards or toner cartridges) which have been pre-identified as requiring removal will be extracted and transferred to a storage container. Any components that may have hazardous contents (such as batteries, capacitors of concern, etc.) will be removed and transferred to an appropriate container as necessary. Any other components that may have an added value or have been pre-identified and agreed with potential recyclers that their removal would be beneficial to the recycling process, will be removed and transferred to a storage container e.g. ferrous, nonferrous metals and printed circuit boards. Plastics thought to contain brominated flame retardant will be separated and stored in appropriate containers destined for specialist treatments.

Computer Monitors

Products will be segregated by type and, if appropriate, tested for electrical safety. Functional testing will follow that may lead to essential repairs or refurbishment. Finally, products are cleaned and further segregated for remarketing or redeployment.

At this stage viable products are considered to be non-waste and are stored pending sale or re-use.

In the case of Waste TV's Monitors, they will either be transferred to appropriately authorised facilities for further treatment.

Power supply and other external cables will be removed and transferred to a storage container for subsequent bulking up. Any components or materials (such as CPU's, memory and circuit boards) which have been removed and transferred to a storage container. Any components that may have hazardous contents (such as batteries, capacitors of concern, etc.) will be removed and transferred to an appropriate container as necessary. Plastics thought to contain brominated flame retardant will be separated and stored in appropriate containers destined for specialist treatments.

Outgoing materials and components:

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All materials and components derived from each of the above processes will be bulked up and stored in appropriate containers prior to dispatch to third parties. All containers will be clearly marked with the contents and destination and will be dispatched in accordance with the Duty of Care and Transfer of Waste regulations. Any components containing hazardous materials will be stored internally in secure area. Weights of all dispatches will be assessed and reconciled with assessed weights received to achieve an approximate mass balance (after taking stocks and work in progress into account) over any given period of time.

Hazardous materials, suitably segregated and stored, including TV's and monitors as well as batteries from Uninterruptable Power Supplies will be transferred to appropriately authorised facilities for further treatment, recycling and disposal.

The management of persistent organic pollutants (POPs) will be undertaken in accordance with recently published guidance for the classification and description of WEEE devices including the presence of hazardous chemicals and the persistent organic pollutants present.

Meeting end of waste

Any items of WEEE which are repaired and refurbished will have met PAS141 accreditation. In order to determine whether an item is suitable the operator will undergo dedicated software checks as part of the PAS 141 standard; the checks will include the following:

- General electrical appliances – power-on test and general electrical safety test with the operator's toolkit
- Laptop/desktop computers – power-on, general electrical safety test, drives are wiped with approved software (Blancco) and OS is reinstalled, activated online and general tests are performed – CPU test, motherboard test, memory test, HDD smart test and battery cycle count/charge test.
- Networking devices – Set to factory reset default and tested.

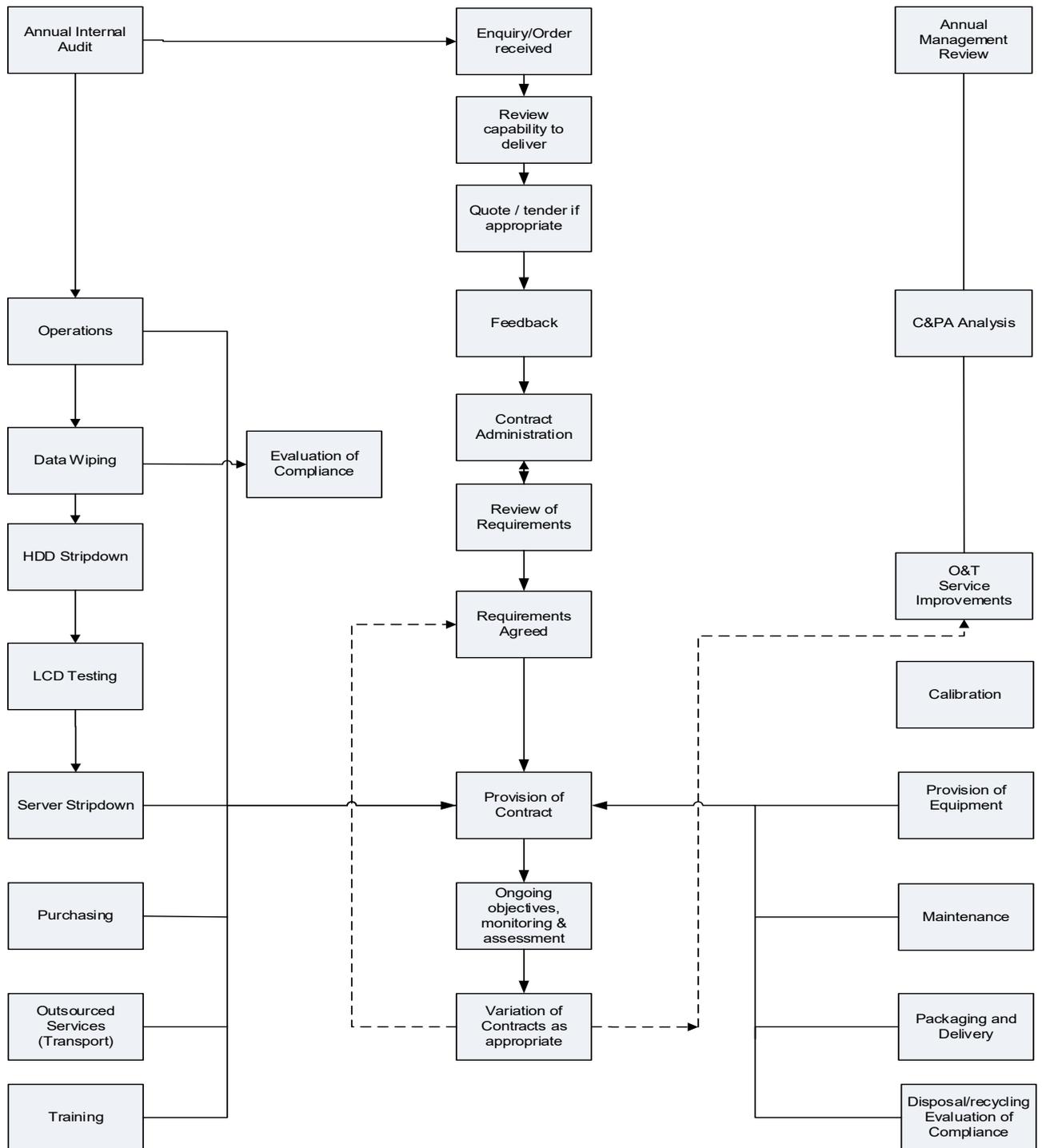
There are trained operatives on site which will carry out tests to see whether the item can be repaired and refurbished, if not, the item will be waste.

Items suitable for re-use items will be bagged, boxed, labelled and stored inside the locked building with 24/7 CCTV. Items sent for re-use will come with a 3-month warranty with some items having 6-12 months. The re-use items are tracked and traced with barcode stickers and with an on-site tracking sheet through the selling platform or shipping company after being sold.

Receiving/downstream sites hold records of their respective recycling capacity which is made available for ILS to ensure we are meeting our targets. WEEE which is not suitable for repair or refurbishment will be bulked and sent to a suitably permitted site for further treatment.

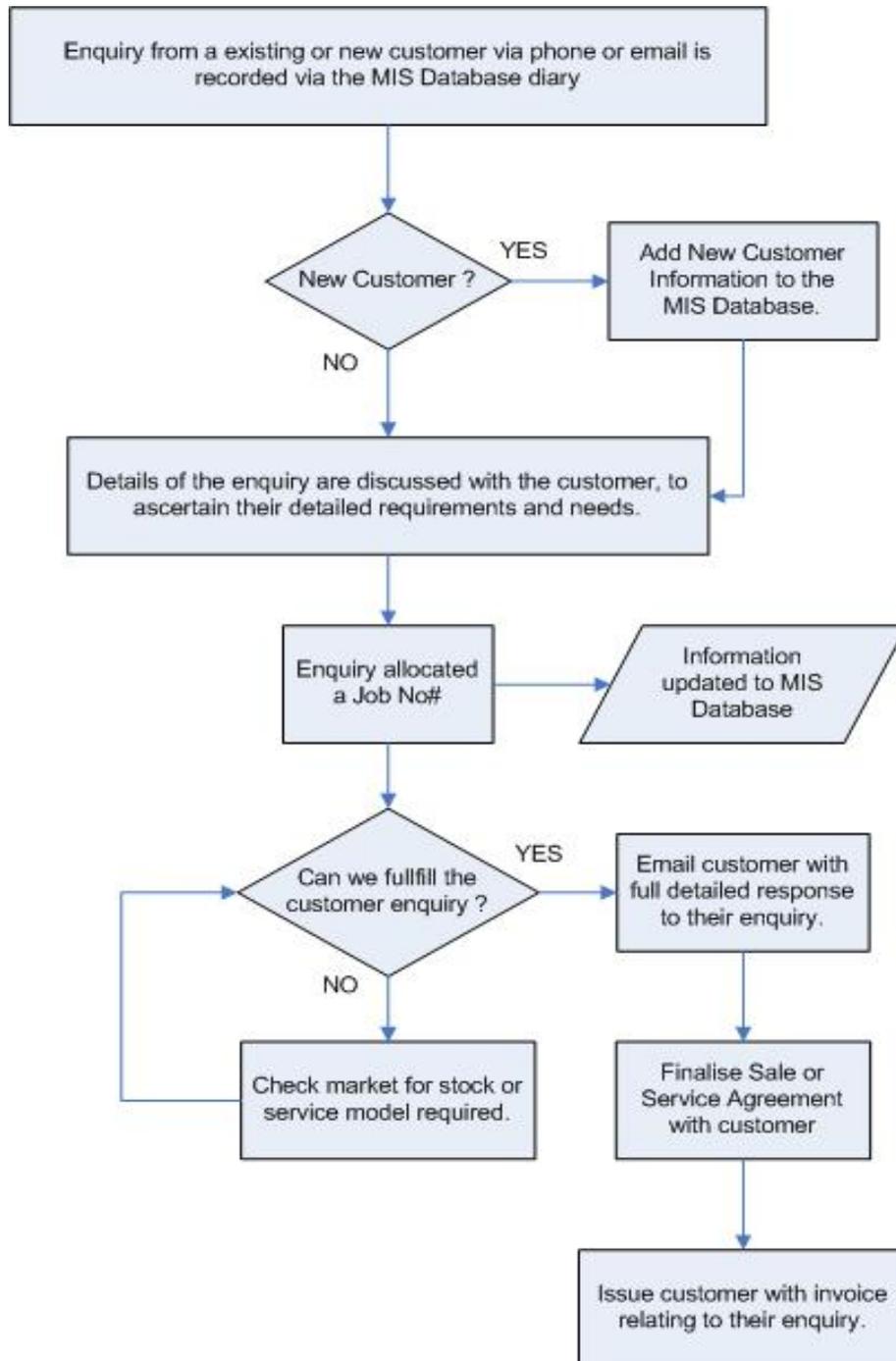
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1. Overall Process Sequence and Interaction:



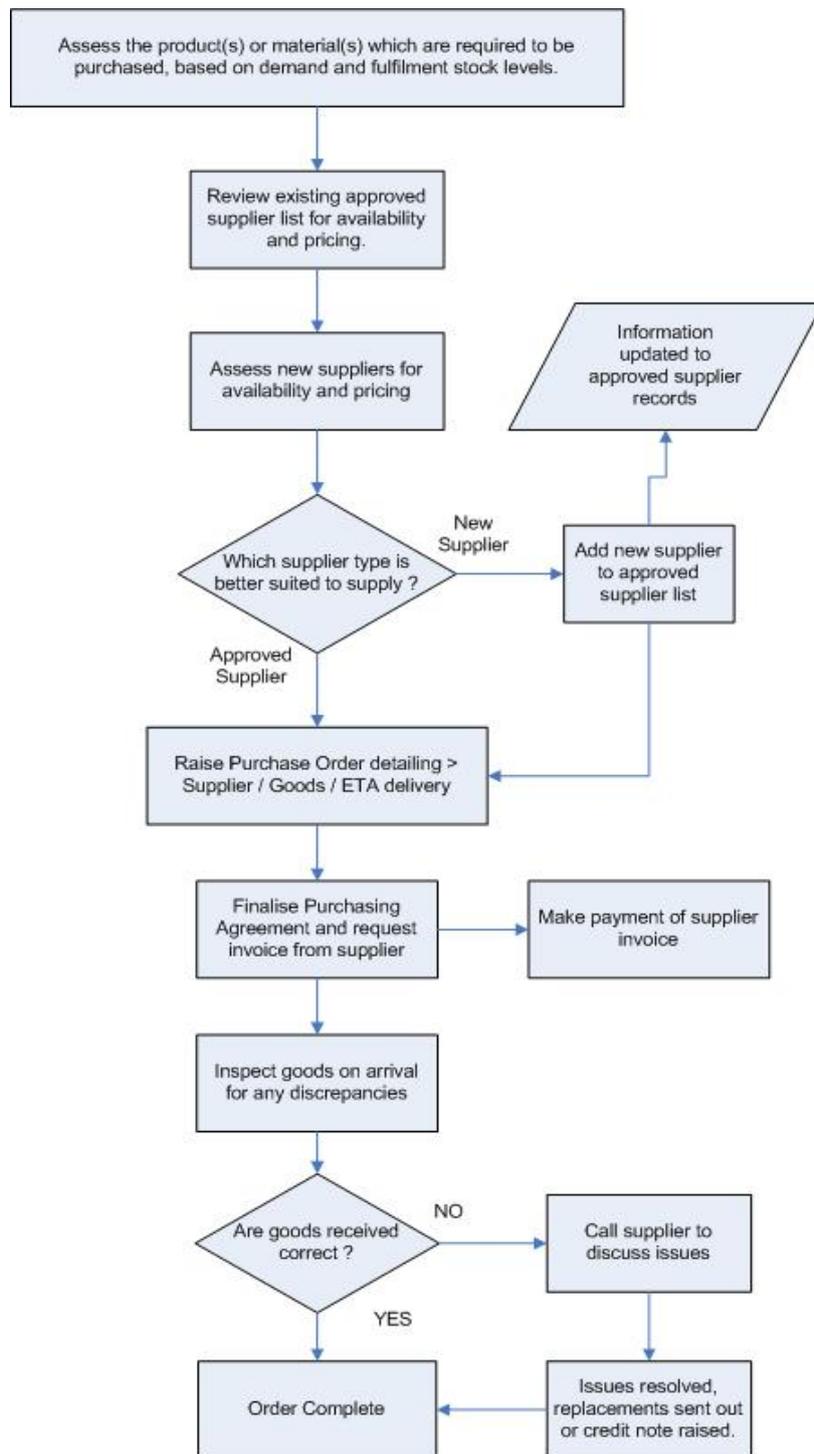
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2. The Enquiry, Quotation and Contracts Process:



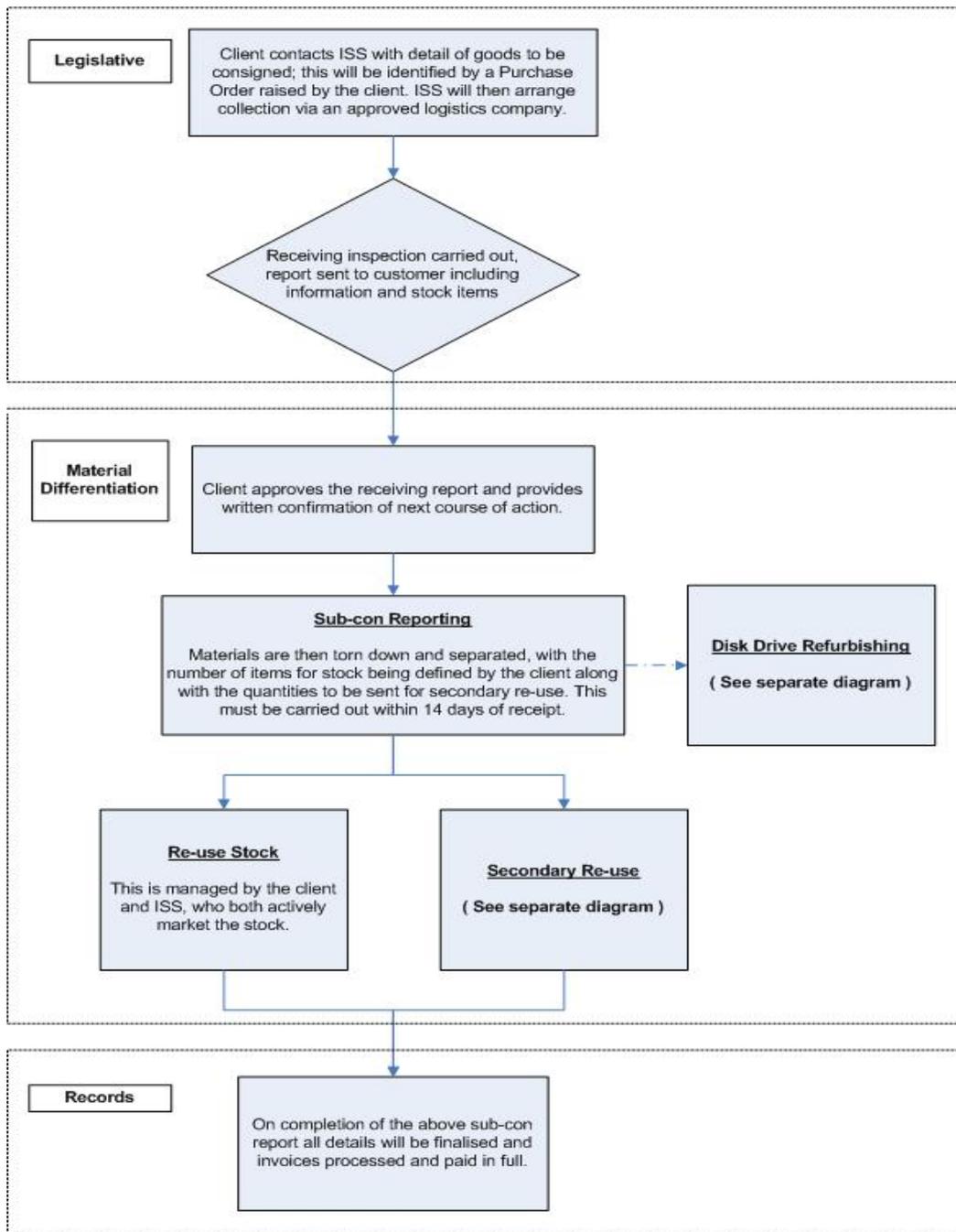
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3. The Purchasing and Receiving Process:



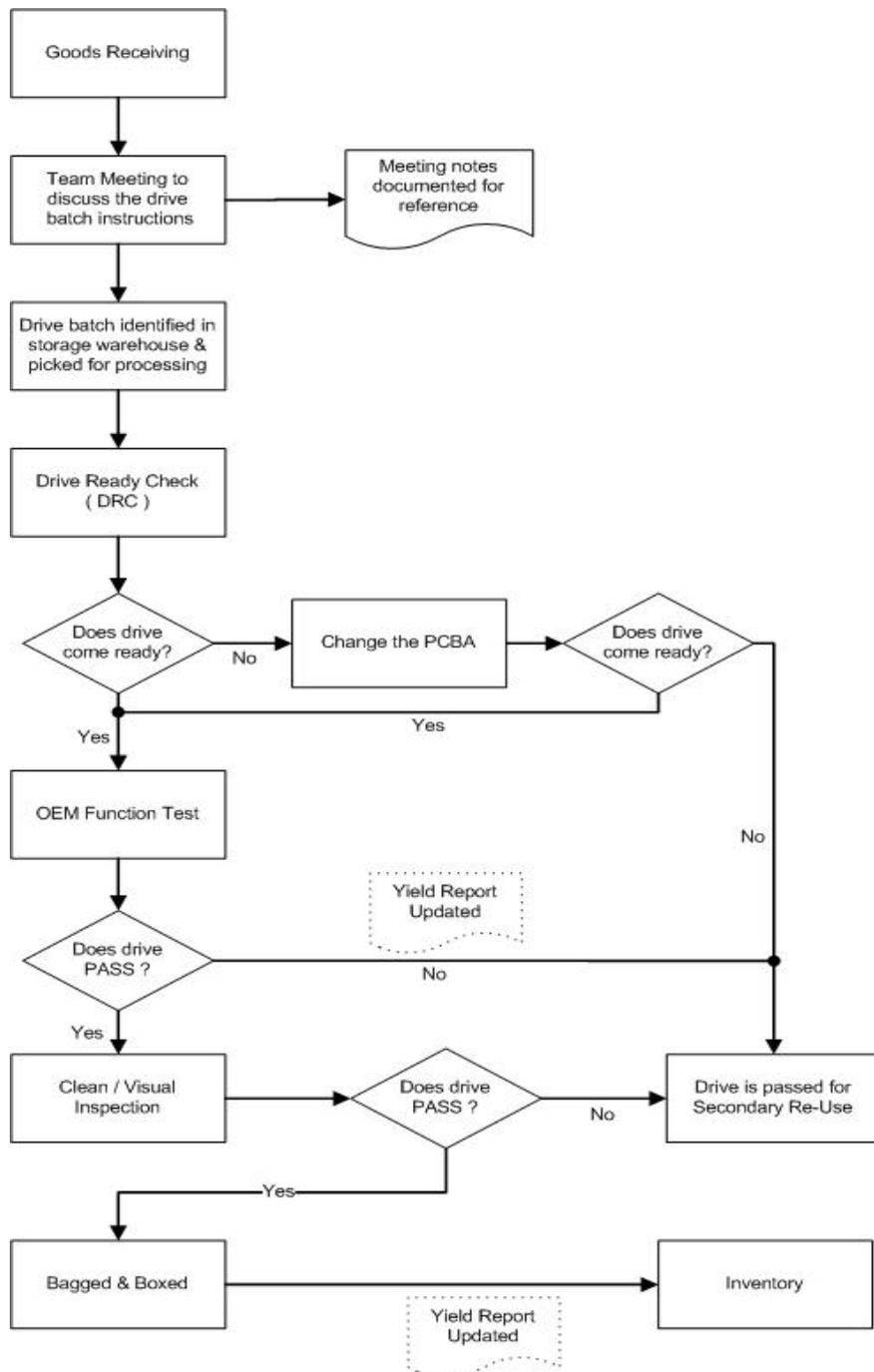
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4. Operations – Asset Management:



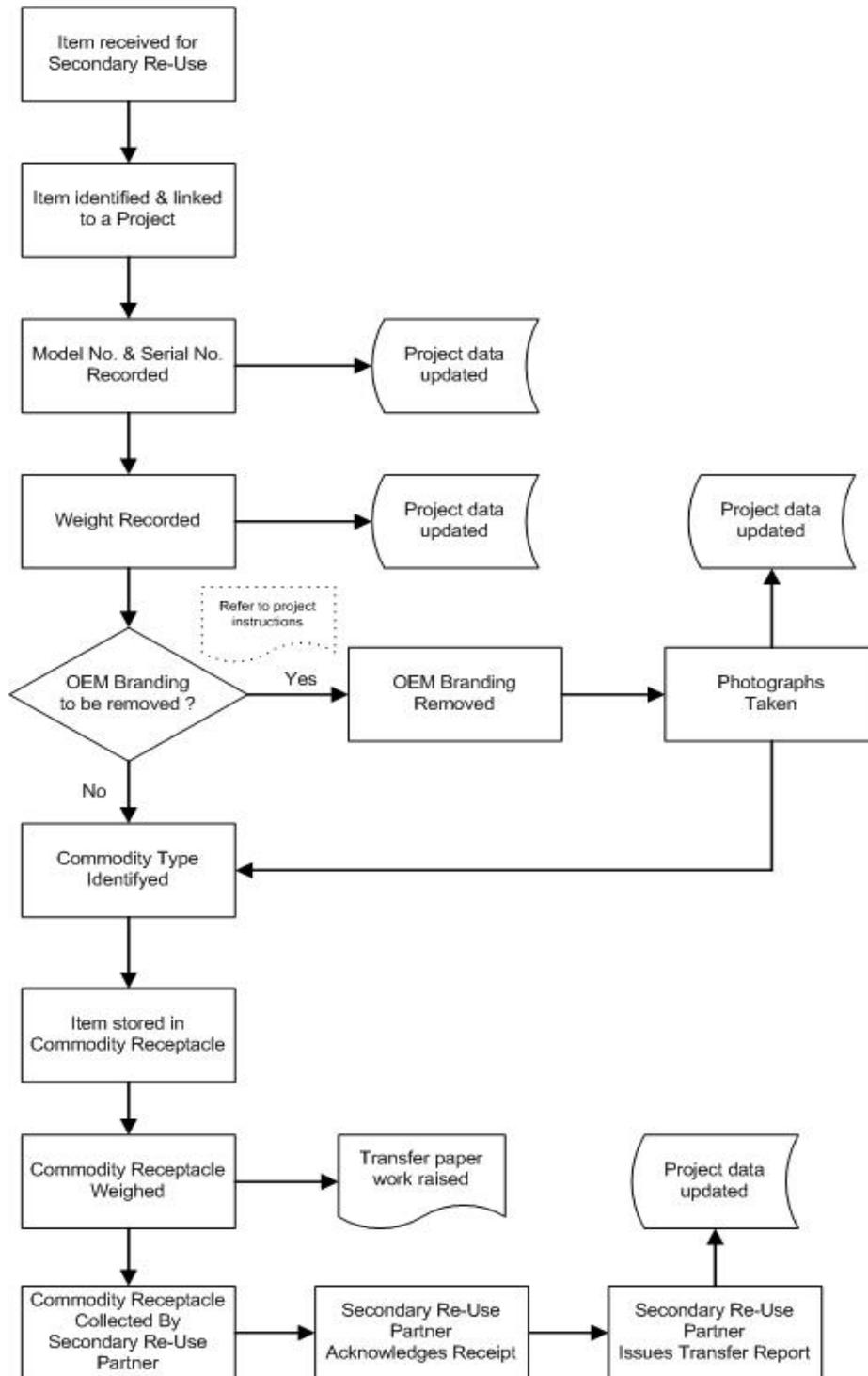
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5. Operations – Hard Disk Drive Formatting:



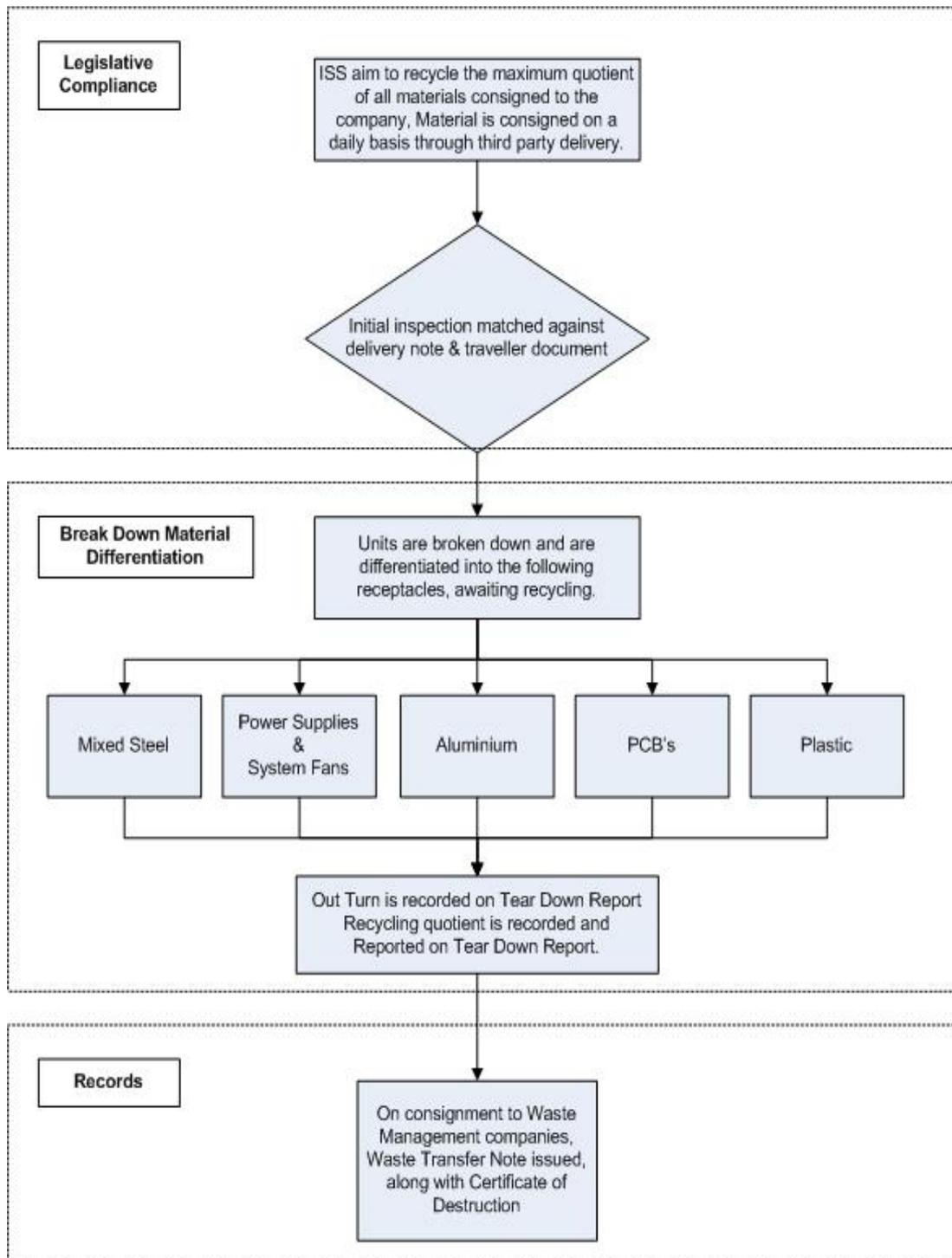
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6. Operations – Secondary Reuse:



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7. Operations – Waste Recycling:



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MP 1.3 Plant and Equipment:

- 1.5 Tonne and 2.5 Tonne counterbalance forklift trucks, standard forks
- Hand and battery-operated pallet trucks
- HDD Data Sanitation hardware and software
- One Weigh scales maximum 2000 kgs capacity for offsite secure data destruction services
- WEEE baler
- Handheld electrical tooling
- Mobile Secure Data Destruction Equipment

MP 1.4 Site Layout Plan:

Reference Appendix A1 and A2.

MP 2.0 Site Engineered Containment and Drainage Systems:

The facility will be undertaking no disposal activities and therefore has no requirement to meet various criterion e.g. effluent collection, leachate management, landfill containment etc.

Site Drainage:

External:

From discussions with landlord of the site, the drainage system was decommissioned prior to the operator taking control of the site in 2013 due to the previous use being the storage of highly polluting substances.

As can be seen from Appendix VI, a drainage plan was produced in 2013 and within the permitted boundary of site comprised two ACO drains which fed into a surface water drainage system which ran underneath the building to the east and into an existing culvert to the east which assumed to drain not the River Ely. Currently all surface water is captured into the ACO drains which eventually evaporates. As there is no escape point for surface water at the site, the site comprises a fully sealed system.

There are no proposals to re-instate the drainage system as during the previous 8 years of operating, the site has not experienced any flood issues.

Internal:

The internal areas are all sealed concrete floors with no internal drainage, thus presenting a large catchment area that could be dealt with appropriately in the event of a spill. Absorbent materials, in the form of spillage kits, will be available within the WEEE dismantling area.

Liquids: No liquids are anticipated.

Gases: No gaseous emissions are predicted to be involved in the processing of the WEEE materials.

Solids: Solid waste materials will be collected, stored and contained prior to dispatch in an appropriate manner.

Hazardous Materials: Any components containing hazardous materials will be stored securely within the main site in a clearly signed area. Care will be taken to ensure that

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separation of the various material types will prevent incompatible mix of substances from taking place. Appropriate documentation will be maintained at all times to ensure that a full knowledge of the materials held on site is available to site management.

It is likely that Hazardous Materials will fall into only two categories:

- Cathode Ray Tubes (CRT's), or
- Batteries.

Residual Wastes: In the event of cessation of treatment activities at the site all wastes that have not been cleared, i.e. transferred or consigned to other authorised treatment facilities, will be removed.

MP 2.1 Pre-treatment Storage Activities:

Storage of waste electrical and electronic equipment units and discarded electrical and electronic equipment units prior to treatment or testing is within a warehouse on impervious concrete flooring. The design of roofing prevents the ingress of rainwater.

MP 2.2 Operation of Mobile Plant:

All forklift truck operators are licensed, and the trucks are subject to routine maintenance and thorough inspection and examinations.

MP 2.3 Storage of Residual Waste Materials and EWC Codes:

Residual waste materials are stored inside and external to the warehouse facility on concrete surfacing with an impermeable surface. Containment is provided as follows:

Material	Location	Prevention of Pollution
Ferrous Metals <i>EWC 19 12 02</i>	External in locked yard within a 35 yd ³ roll/roll off skip.	Stored within skip externally in the yard.
Non-Ferrous Metals <i>EWC Code 19 12 03</i>	Internal 1 tonne bags.	Stored inside the warehouse.
Plastics <i>EWC Code 19 12 04</i>	Internal 1 tonne bags.	Stored inside the warehouse.
Printed Circuit Boards <i>EWC Code 16 02 15* and 16 02 16</i>	Internal Gaylord boxes and Internal 1 tonne bags.	Stored inside the warehouse.
Incoming WEEE <i>EWC Code 16 02 13 and 16 02 14</i>	Internal pallets, bags and shrink wrapping	Stored inside the warehouse.
Batteries <i>EWC Code 16 06 01*, 16 06 02*, 16 06 05, 20 01 33 and 20 01 34</i>	Acid resistant base sealed containers	Stored inside the warehouse.

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MP 3.0 Control of Potentially Polluting Leaks and Spillages:

The facility does not process waste containing any liquids.

MP 3.1 Maintenance Schedules and Procedures for Drums:

Not applicable.

MP 3.2 Documented Procedures for Remediation of Leaks and Spills:

Reference Appendix B extracts from the Site Emergency Plan

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MP 3.3 Equipment and Materials for Cleaning Leaks and Spills:

Oil, chemical and mercury spill kits are provided within the facility. Regular inspection of containment contents is undertaken as part of the Warehouse Supervisor’s weekly inspections.

MP 3.4 Storage & handling of hazardous wastes

Batteries - Batteries accepted at the site will be stored and handled as follows:

- I. Stored upright in clearly labelled, acid-resistant, leakproof containers
- II. Different types of batteries will not be mixed together, for example lead acid batteries with lithium-ion batteries. Containers can usually hold up to 1 tonne of batteries and are stored inside the building. Daily checks are made on the containers to ensure they are fit for purpose.
- III. A suitable absorbent agent is kept within near the storage area so that prompt action can be taken to absorb any spillages. Any contaminated adsorbent material will then be removed to an approved disposal facility.
- IV. Removal of batteries is carried out in accordance with the Hazardous Waste Regulations 2005 (as amended) or any subsequent amending legislation

Cathode Ray Tubes (CRT’s) – Any CRTs accepted and stored will be handled as follows:

- I. Stored inside the building on an impermeable surface with sealed drainage
- II. Stored in sealed in sealed containers which do not break i.e. steel or plastic.
- III. Manually handled by staff to prevent breakage of CRTs.

If any breakage to CRTs occur, reference should be made to B.3 to ensure action is initiated immediately.

The location of storage areas for batteries and CRTs may vary throughout the lifetime of the permit as generally all waste on site is stored in containers unless undergoing sorting or treatment. This means the containers will be moved to different areas of the site on a continual basis.

Any batteries and CRTs stored will be done so in separate containers and monitored at least once throughout the day to ensure the integrity of the containment is not compromised.

MP 4.0 Management and Supervision Structure:

Amenity Management and Monitoring:

As identified by the Environmental Risk Assessment, the issues and concerns relating to this operation on this site are minimal in terms of environmental risk of harm. To ensure that this is maintained, the procedures operated by the site will include the relevant requirements to ensure that Dust, Fibres, Particulates, Odour, Noise, Litter, Vermin and Smoke are all kept to a minimal as well. A listing of the minimal issues and concerns relating to these areas are included below:

Dust: Sources of dust: from the products being dismantled, from the wrapping received around bulk products arriving for dismantling, from dirt carried in from outside by personnel and vehicles, from windblown dust from outside.

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Constituents: primarily earth, grime, dirt and dust. All dusts should be cleaned from the work areas daily or more frequently if they provide a slipping hazard. The daily cleaning of the building should be sufficient to achieve this level of control. If there are sufficient levels of dust to make dust masks necessary then these should be worn, but this is not anticipated to be the case.

Volume expected: < 5 Kg/day indoors

Fibres: Sources of fibres: from workers' clothes, from waste cloth included incorrectly with the WEEE.

Constituents: man-made and natural fibres possibly contaminated with oils or inks. Requirements: to be collected with dusts arising as described above. Dust masks to be worn if the levels get high enough to warrant them – it is not anticipated this will ever be necessary.

Volume expected: < 1 Kg/day

Particulates:

Sources of particulates: none expected

Constituents: not applicable

Requirements: that staff be aware that if particulates are present that the wearing of the appropriate mask is carried out as required and the source of such particulates be immediately determined, and action taken if appropriate.

Volume expected: < 1 Kg/day

Odour:

Sources of odour: none expected (WEEE does not have organic components that might decay, nor are they made of odorous materials, nor are any odorous activities to be carried out upon them during the disassembly process – such as burning or speed cutting that might result in friction generated smells)

Constituents: not applicable

Requirements: that staff be aware that if odours are present that the source of the odour be determined as soon as possible as it indicates that there may be some non-desirable activities being carried out that should be ceased forthwith.

Volume expected: not applicable.

Noise:

Sources of noise: traffic, people, forklifts, trolleys, radios, disassembly process, dropping of items into containers.

Constituents: not applicable

Requirements: that staff be aware that noise levels should not reach the degree such that they cause nuisance to their colleagues their neighbours or any passing individual. Where excessive noise is heard, this should be investigated forthwith, and the appropriate corrective action taken as soon as practicable. Where an operator is participating in a noisy activity, the

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correct ear protection and noise dampening equipment must be used in line with the site's H&S policy. Volume expected: the site is in an industrial area with a reasonably busy roadway on one side of it so there is a high level of ambient noise. The nearest neighbours to the site are also industrial processes so have their own noise emissions. The manual disassembly activities are being carried out inside the site building and are not expected to be loud. The general level of noise on site is currently, and is expected to remain, low. Monthly noise measurements inside and outside of the Warehouse is undertaken by the Warehouse Supervisor.

Vermin:

Sources of vermin: attracted by the food waste

Constituents: rats, mice, flies, dogs, seagulls, crows

Requirements: that food waste is not accepted at this site, however, the site employs a pest control company that undertakes monthly inspections at the site.

Volume expected: not applicable.

Litter:

Sources of litter: windblown from off-site, from lorry drivers and other visitors, from staff, from the storage of materials on site, from the disassembly process, from the wastes generated from the disassembly process.

Constituents: paper, plastic, glass, metal, cloth, food, plants, ceramic.

Requirements: that the site be inspected at regular intervals, that the levels of litter never be allowed to reach beyond a certain point, that the site be divided into zones that rest with the responsibility of specific individuals so that they might take action earlier rather than only after the inspections, that dustbins be placed around the site for use by visitors, that the possibility of bringing food onto the site and eating it outside of the canteen areas be discouraged.

Volume expected: < 15 Kg/day

Smoke:

Sources of smoke: cigarettes/pipes, vehicles, fire.

Constituents: not applicable

Requirements: Smoking of tobacco is not allowed on site by any person: employees, visitors or contractors. Vehicles should be checked if they are running incorrectly if they are observed to be emitting high volumes of smoke. In the event of fire then the appropriate actions should be taken in line with the site's existing Fire Procedures.

Volume expected: There is not expected to be any smoke from the disassembly activities as the operations does not result in such outputs.

MP 4.1 Management Structure:

Reference Appendix F

MP 4.2 Training Requirements:

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4.2.1
At

least one member of the management Team will hold a Certificate of Competence from the Waste Management Industry Training Board (WAMITAB) for Level IV Transfer and Treatment of Hazardous Waste (MROC2 or higher). Intelligent Lifecycle Solutions are aware that technically competent people in are required to pass their Continuing Competence test every two years.

4.2.2 All operatives will receive operational training for all of the processes on which they are expected to work. Where appropriate, certain employees will also be required to attend relevant professional training to improve their understanding of current statutory waste controls.

4.2.3 They will also be required to follow internal procedures and manufacturers guidelines with regard to the operation of plant and machinery on the site. These procedures will be reviewed as part of any proposed changes to the operational and maintenance procedures on site and as part of the company’s internal environmental and health and safety audits.

4.2.4 The training of staff is monitored and controlled by the site management by way of an employee ‘matrix’. Priority is given to the training of those responsible for carrying out site inspections, but all employees must be trained in the duties relevant to their tasks and this will be listed also. ISO 14001:2015 Environmental Management System, ISO 45001:2018 Occupational Health and Safety Standard and to the Responsible Recycling (R2) Practices Standard. Integral to maintain this Standard is to regularly review and undertake identified training needs. Training records are maintained in the Site Administration Office and training is recorded on an electronic database

MP 5.0 Site Security:

- The entire site is enclosed with palisade fencing 2.4 metres high.
- Access to site is via lockable steel gates. Steel gates to a height of approximately 2.4 metres are available to secure the site when not operating. Entrance is also controlled by electronic tags.
- Site boundary fencing is checked regularly. Defects are reported to the operations manager and repairs undertaken as appropriate.
- Site has manned remote outsourced security 24 hours per day 7 days per week all year, Random but frequent security checks of the site are undertaken and recorded when the site is shutdown.
- The site is served with CCTV technology.

MP 6.0 Fire Prevention and Control:

Fire Risk Assessments are conducted regularly as required by the Regulatory Reform (Fire Safety) Order 2005.

MP 6.1 Fire Fighting Equipment:

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- Smoke / heat detectors are positioned over the plant and within enclosures, which activate the fire alarm. Sprinkler system.
- Handheld fire extinguishers, CO₂ and dry powder are located throughout the plant.

MP 6.2 Fire Procedures – Prevention:

No smoking policy across site except in designated controlled areas. Housekeeping to prevent accumulation of flammable substances.

MP 6.3 Fire Procedures Detection:

Reference Appendix C.

MP 7.0 Waste Quantity Measurement Systems:

All materials and components derived from each of the dismantling processes will be bulked up and stored in appropriate containers prior to dispatch to third parties. All containers will be clearly marked with the contents and destination and will be dispatched in accordance with the Duty of Care and Transfer of Waste regulations. Any components containing hazardous materials will be stored internally in secure area. Weights of all dispatches will be assessed and reconciled with assessed weights received to achieve an approximate mass balance (after taking stocks and work in progress into account) over any given period of time.

MP 7.1 Methods of Evaluating and Recording waste types:

The waste types are assessed and counted as the vehicle is unloaded at intake and the relevant data recorded on the Goods Transfer Note.

Reference appendix D.

WP 7.2.1 The following systems are used for measurement of waste:

Waste	Method	Location
Ferrous Metals	External Weigh scales	Preferred Scrap Metal dealer
Non-Ferrous Metals	Internal Weigh scales	Internal Warehouse
Printed Circuit Boards	Internal Weigh scales	Internal Warehouse
Plastics	Internal Weigh scales	Internal Warehouse
Cardboard	Internal Weigh scales	Internal Warehouse
Plastic packaging	Internal Weigh scales	Internal Warehouse
Repaired PC's	Data Trace Software	Internal Warehouse
Repaired HDD	Data Trace Software	Internal Warehouse

MP 7.2.2 Weigh scales Calibration:

The Facility 's weigh scales (T Scale Model K3 2,000 kg capacity) are subject to external calibration three times per annum.

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MP 7.2.3 Availability of Records

The WEEE facility will maintain daily records of deliveries and dispatches as detailed in previous sections. Health & Safety incidents will be managed in accordance with the business Health & Safety procedures. 'Near misses' are to be recorded within the existing Health & Safety procedures. All records and other documentation referred to in the working plan will be held securely within a site office and available for inspection by the appointed NRW officer at all reasonable times. The availability of records will be subject to audit as part of the integrated Quality & Environmental Management System.

MP 7.2.4 Complaints Procedure

Any complaints will be investigated promptly, and appropriate remedial action will be taken if the complaint is validated e.g. stop noisy activities as soon as reasonably possible. Complaints will be recorded on the form found in Appendix K.

Complaints to NRW will also be recorded and taken into account. An olfactory assessment survey will be carried out from where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

In summary, complaints will be handled as follows:

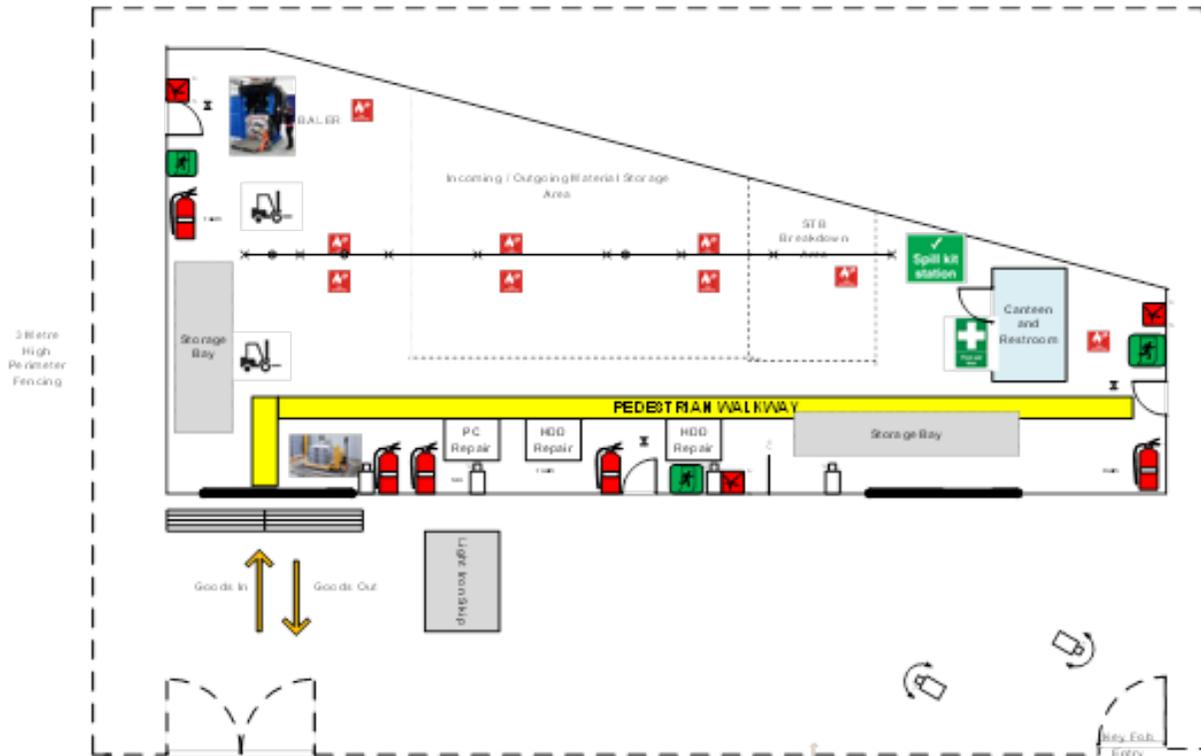
- identify the cause
- minimise the impact of the activity causing the problem
- investigate the root cause of the problem
- take steps to ensure the problem is not repeated, this may include changing a piece of equipment or procedure
- record the complaint and detailing what measures were taken to rectify the issue
- review and update this management system accordingly to reflect any changes.

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Appendix A1 General Layout of the Facility:



Intelligent Lifecycle Solutions
Tonyandy Warehouse Site Plan



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Appendix A2.1 Ariel View of the Facility ST 00689 90017:



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Appendix A2.2 Site Plan: Site Boundary in Green.

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Appendix B Spill Procedure:

B.1 Oil and Diesel Spills:

- Inform the Emergency Controller as soon as possible.
- Remove all possible sources of ignition.
- Always remember to wear the appropriate Personal Protective Equipment (PPE).
- NEVER wash the spill into drains or manholes or allow them to seep into the ground.
- NEVER use detergents to clean area.
- Keep the spill as small as possible by using oil granules, sand or dammit mats.
- Use the correct spillage kit for the job.

Oil Only		
General Purpose		
		Chemicals
Oil, Petrol and Lubricants	Oil, Diesel, Coolants, Mild Solvents and Water	Acids, Caustics and when liquid unknown

- Prevent vehicles, plant and pedestrians entering the area.
- Clean up the area as soon as possible to prevent any access liquid entering the drains.
- Ensure that all the used spill kits and absorbent materials are stored in an appropriately banded container - take the container to the spill record details on the register on the spill kit.
- Always replace the spillage kits that you have used as soon as the spill has been cleaned up properly.

B.2 Lead Acid Spills – Forklift Truck and Server Batteries:

- Inform the Emergency Controller as soon as possible.
- Remove all possible sources of ignition.
- Always remember to wear the appropriate Personal Protective Equipment (PPE).
- NEVER wash the spill into drains or manholes or allow them to seep into the ground.
- NEVER use detergents to clean area.
- Clean the spill as soon as possible using chemical resistant absorbent mats and socks.
- Clean up the area as soon as possible to prevent any access liquid entering the drains.
- Ensure that all the used spill kits and absorbent materials are stored in an appropriately banded container - take the container to the spill record details on the register on the spill kit.
- Always replace the spillage kits that you have used as soon as the spill has been cleaned up properly.

B.3 Mercury Spills:

Most computer Liquid Crystal Display (LCD) panels are lit with built-in fluorescent tubes above, besides, and sometimes behind the LCD. In the event. In the event of a breakage of a laptop the following procedure is to be followed:

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- Inform the Emergency Controller as soon as possible.
- Always remember to wear the appropriate Personal Protective Equipment (PPE).
- In the event of spillage, try to confine the affected area to a minimum.
- Use the mercury spill kits provided to clean up mercury spills.
- Put on protective gloves and mask to reduce dust inhalation.
- Open doors to improve ventilation.
- Try to reduce the spread of the spill as much as possible; in particular, avoid getting mercury on the floor. Never use a vacuum cleaner or aspirator.
- Using the brush, move the globules of mercury together to form one large pool. Pick up as much of this as you can using the syringe and place in the waste container. Sprinkle the powdered absorbent granules from the mercury spill kit on to the larger mercury beads. The absorbents will then bind the mercury so that it can be easily removed and suppresses the vapor of any missing mercury.
- Place all materials used with the cleanup, including gloves, into a bag. Place all mercury beads and objects used in the cleanup into the bag. Secure the bag and label it.
- This must then be disposed of as a hazardous waste.

Appendix C Fire Procedure:

- Raise the fire alarm by breaking the glass at the nearest fire alarm point. Then evacuate the building, by walking quickly and calmly using the nearest fire exit route closing doors and windows whilst exiting and go to the Emergency Assembly Points (Fire Zone Area) at the front gate in the main car park and stand in the allocated appropriate zone.
- Assist physically impaired individuals to a secure area and notify emergency responders.
- Assist injured personnel or notify emergency responders of the medical emergency.
- Employees and visitors must stay low if confronted with smoke. Check closed doors for heat before opening.
- Before an employee tackles any fire, they should think that unless they are 100% confident then just raise the fire alarm evacuate the building immediately.
- Use a fire extinguisher only if safe to do so and you have been trained.
- Call 999 immediately and provide information to the Emergency Services.
- Consideration should also be given to the possible risks to offsite persons and the consequent need to evacuate nearby businesses and/or closing off public roads. In this respect the advice of the police and/or emergency fire services should be sought.
- The Fire Marshall is responsible for ensuring that all personnel are out of the building by conducting a roll call.
- The Fire Marshall will ensure that the emergency fire services have uninterrupted access to the incident and that water hydrants are available for use.
- Employees and visitors must stay away from the building until it is safe to return.

Spill Response exercises are carried out annually.

Fire Extinguishers:

- Four film-forming foam extinguishers used on: wood, paper, fabrics. Flammable liquids (DO NOT USE NEAR LIVE ELECTRICAL EQUIPMENT).
- 2 Carbon Dioxide extinguishers used on: electrical, flammable and liquid Fires.

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**HAZARDOUS WASTE REGULATIONS 2005:
Limited**

Intelligent Lifecycle Solutions

CONSIGNMENT NOTE

A copy of this note is retained by the PRODUCER / CARRIER / CONSIGNEE (circle where relevant on each copy)

Part A – Notification Details

1 Consignment note code: - INT064 / 00054

Is this part of a multiple collection? (tick when applicable)

2 The waste described below is to be removed from:

(name, address, postcode, tel. no, email)

Intelligent Lifecycle Solutions

Unit 4

Dinas Isaf Industrial Estate

Williamstown

Tonypandy

CF40 1NY

Premises Code: CAL421

4 The waste will be taken to (only complete for standard movements) (name, address, postcode, tel. no, email)

Mekatek Electronic Recycling Ltd

Unit F1-F2,

Coedcae Lane Industrial Estate,

Pontyclun,

CF72 9HG

EAWML/EPR/Exemption Reference : EPR/FB3193HX

Part B – Description of the waste

1 The process giving rise to the waste was: Recycling

2 SIC 2007 code: 38.32

3 WASTE DETAILS

Description of waste	EWC /LoW Code	Quantity (kg/units)	Chemical Component	Concentration (% or mg/Kg)	Physical form	Hazard code	Container type
TV/monitors (industrial type/ size equipment only)	1 6 0 2 1 3*		BaO & PbO	3.5% & 15%	Solid	H5/H6/H7 /H10/H11& H14	Loose/ Pallets/ Stillage
TV/monitors from domestic/ similar commercial/ LA source	2 0 0 1 3 5*		BaO & PbO	3.5% & 15%	Solid	H5/H6/H7 /H10/H11& H14	Loose/ Pallets/ Stillage
Small Mixed WEEE containing hazardous components co – collected with 20 01 36	2 0 0 1 3 5*		Lead/ Mercury/Ni-Cd battery CRT Plasma/ LCD display HCFCs/ CFC /HFC	0.06% 0.95% 0.19%	Mixed	H6, H7, H14	Loose/ Stillage
Printed Circuit Boards	1 6 0 2 1 5*		Brominated flame retardant TBBPA	0.25%	Solid	H400/H410	Loose
Small mixed WEEE	2 0 0 1 3 5* 2 0 0 1 3 6		Antimony trioxide and or POP's		Solid		Loose
Lead Acid Batteries	1 6 0 6 0 1*		Lead Acid		Mixed	H4/H5/H6/ H7/H8/H10 & H14	Loose/ Boxes

The information given below is to be completed for each EWC identified

EWC code	Packing Group	UN identification No	Proper shipping name	UN Class	Special handling requirements
	Not Specified				

Part C - Carrier's certificate **Part D - Consignor's certificate**

If more than 1 carrier schedule attached – tick box
I certify that I today collected the consignment and the details in A2, A4 and B3 are correct and I have been advised of any specific handling requirements.

I certify that the information in A, B and C has been completed and is correct, that the carrier is registered/ exempt and was advised of the appropriate precautionary measures. All of the waste is packaged and labeled correctly and the carrier has been advised of any special handling requirements.

Where this note is part of a multiple collection the round number/ collection number are:
XXXXXXXXXXXXXXXXXX/YY

I confirm that I have fulfilled my duty to apply the waste hierarchy as required by regulation 12 of the Waste (England & Wales) Regulations 2011

1 Carrier name: Paul Bush
On behalf of (name, address, postcode, telephone)
ILS, Tonypandy, CF40 1NY
2 Carrier registration no:
CB/DU9972
3 Vehicle registration no:

1. Consignor name: Blaine Llewellyn
On behalf of: (name, address, postcode, telephone)
Intelligent Lifecycle Solutions
Unit 4
Dinas Isaf Industrial Estate
Williamstown
Tonypandy
CF40 1NY

Signature:

Signature:

Date / Time: DD/MM/YYYY HH/MM

Date/ Time: DD/MM/YYYY HH/MM

Part E– Consignee's certificate

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I have received the wastes described in Part B, on the vehicle detailed in Part C and certify that this site as described in A4 authorises the management of the waste. Waste Management Operation R3, R4, R5, R13 ~~Delete as necessary~~
 Where the consignment forms part of a multiple collection as specified in part C, I certify the number of consignments forming the collection are: xx

Name: _____ Signature: _____

Date / Time: DD/MM/YYYY HH/MM

If any waste is rejected please provide details below:

EWC code	Quantity received	Rejected	Waste Mgt Operation (R or D code)

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Appendix F WEEE Operations Organogram:

a) Company Director:

Overall responsibility for the safe, efficient and effective operation of the site.

b) Compliance Manager:

The Compliance Manager is the Management Representative and is responsible for the Business management System (BMS) Policy development, monitoring of the effectiveness of the BMS and: Ensuring that all BMS requirements are established, implemented and maintained. Reporting on the performance of the BMS to the Senior Management Team for review and as a basis for improvement of the BMS. Updating the Register of Regulations to assure compliance with all legal obligations. Maintaining the Risk Based Thought Assessments Register to monitor Health Safety and Environmental performance. Liaisons with external stakeholders e.g. the Health and Safety Executive and Natural Resources Wales etc. Internal BMS Auditor. Competence: The Systems Manager has 22 years' experience as a Lead Auditor responsible for implementing ISO Management programmes such as ISO 14001, ISO 450001, ISO 9001, ISO 27001 and R2 Globally. Certified Lead Auditor. and is a Member of the Institute of Environmental Management and Assessment in the United Kingdom. Holds WAMITAB Certificates of Technical Competence Level IV for the transfer and treatment of Hazardous Wastes.

c) Operations Manager:

The Operations Managers are responsible for the day-to-day management of the processing and warehouse facilities and for all quality, environmental and safety compliance matters. Making arrangements for receipt and transfer of waste materials to and from suitably authorised partners and maintaining records of those transactions.

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d) Warehouse Supervisor:

Monitor and review a team of operatives undertaking dismantling and treatment processes. Responsible for all production matters including transport and storage. Ensure that production and quality measures are implemented and maintained. Ensure the day-to-day application of the Operatives to the agreed tasks.

e) All Employees:

All operatives will receive training to improve their understanding of the processes and current statutory controls. They will be required to follow laid down procedures, which will specify methods of: -

- Receiving, inspecting and assessing weight of incoming WEEE
- Record keeping
- Dealing with unauthorized waste
- Unloading
- Identification, sorting and separation of WEEE products
- Handling and dismantling of WEEE products
- Identification and handling of non-hazardous WEEE-derived materials and components
- Identification of WEEE materials and components that may have hazardous contents
- Loading and storage of materials, components, products, and residual fractions
- Weight assessment & recording and dispatches of outgoing materials, products and residual fractions
- General housekeeping including safety and cleanliness of the site, plant maintenance, inspection and monitoring including drainage.

In addition to the above it is a responsibility of Management to ensure the provision of necessary resources: human and physical, specialist skills, technology and financial resources, for implementation and control of the Integrated Management System.

Senior Management has appointed a Compliance Manager, who irrespective of any other duties and responsibilities has a defined role, responsibility and authority for the Business Management System.

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Appendix F Certificates of Registration (ISO 14001, OHSAS 18001 and R2):



**PERRY JOHNSON
REGISTRARS, INC.**

Certificate of Registration

*Perry Johnson Registrars, Inc., has audited
the Environmental Management System of:*

Intelligent Lifecycle Solutions
ILS Unit 4, Dinas Isaf Industrial Estate, Tonypanyd, South Wales CF40 1NY United Kingdom

*(Hereinafter called the Organization) and hereby declares that
Organization is in conformance with:*

ISO 14001:2015

This Registration is in respect to the following scope:

The Reuse, Recovery and Recycling of E-Waste

*This Registration is granted subject to the system rules governing the Registration referred to above, and the
Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.*

Terry Boboige

Terry Boboige, President

Perry Johnson Registrars, Inc. (PJR)
755 West Big Beaver Road, Suite 1340
Troy, Michigan 48084
(248) 358-3388



The use of the UKAS accreditation symbol is in respect to the activities covered by the Accreditation Certificate Number 0105.

The validity of this certificate is dependent upon ongoing surveillance.

Effective Date:
September 15, 2018

Expiration Date:
December 16, 2021

Certificate No.:
C2018-03353

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PERRY JOHNSON REGISTRARS, INC.

Certificate of Registration

*Perry Johnson Registrars, Inc., has audited
the Occupational Health and Safety Management System of:*

Intelligent Lifecycle Solutions
ILS Unit 4, Dinas Isaf Industrial Estate, Tonypanyd, South Wales CF40 1NY United Kingdom

*(Hereinafter called the Organization) and hereby declares that
Organization is in conformance with:*

OHSAS 18001:2007

This Registration is in respect to the following scope:

The Reuse, Recovery and Recycling of E-Waste

*This Registration is granted subject to the system rules governing the Registration referred to above, and the
Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.*



Terry Boboige, President

Perry Johnson Registrars, Inc. (PJR)
755 West Big Beaver Road, Suite 1340
Troy, Michigan 48084
(248) 358-3388

The use of the UKAS accreditation symbol is in respect to the activities covered by the Accreditation Certificate Number 0105.

The validity of this certificate is dependent upon ongoing surveillance.

Effective Date:
December 17, 2018

Expiration Date:
March 11, 2021

Certificate No.:
C2018-03354

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PERRY JOHNSON REGISTRARS, INC.

Certificate of Registration

*Perry Johnson Registrars, Inc., has audited
the Environmental, Health and Safety Management System of:*

Intelligent Lifecycle Solutions
ILS Unit 4, Dinas Isaf Industrial Estate, Tonypany, South Wales CF40 1NY United Kingdom

The organization has been audited by a certification body that is in conformance with ISO/IEC 17021 requirements and applicable Accreditation Body requirements. The organization is found to be in conformance with the R2 Standard as applied by the R2 Code of Practices.

Responsible Recycling® (R2) Rev. 7/2013

This Registration is in respect to the following scope:

The Reuse, Recovery and Recycling of E-Waste

This Registration is granted subject to the system rules governing the Registration referred to above, and the Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.



**Responsible™
Recycling**

Terry Boboige

Terry Boboige, President

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The validity of this certificate is dependent upon ongoing surveillance.

Effective Date:

December 17, 2018

Expiration Date:

December 16, 2021

Certificate No.:

C2018-03355

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Appendix G WAMITAB:



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Appendix H Risk Assessment

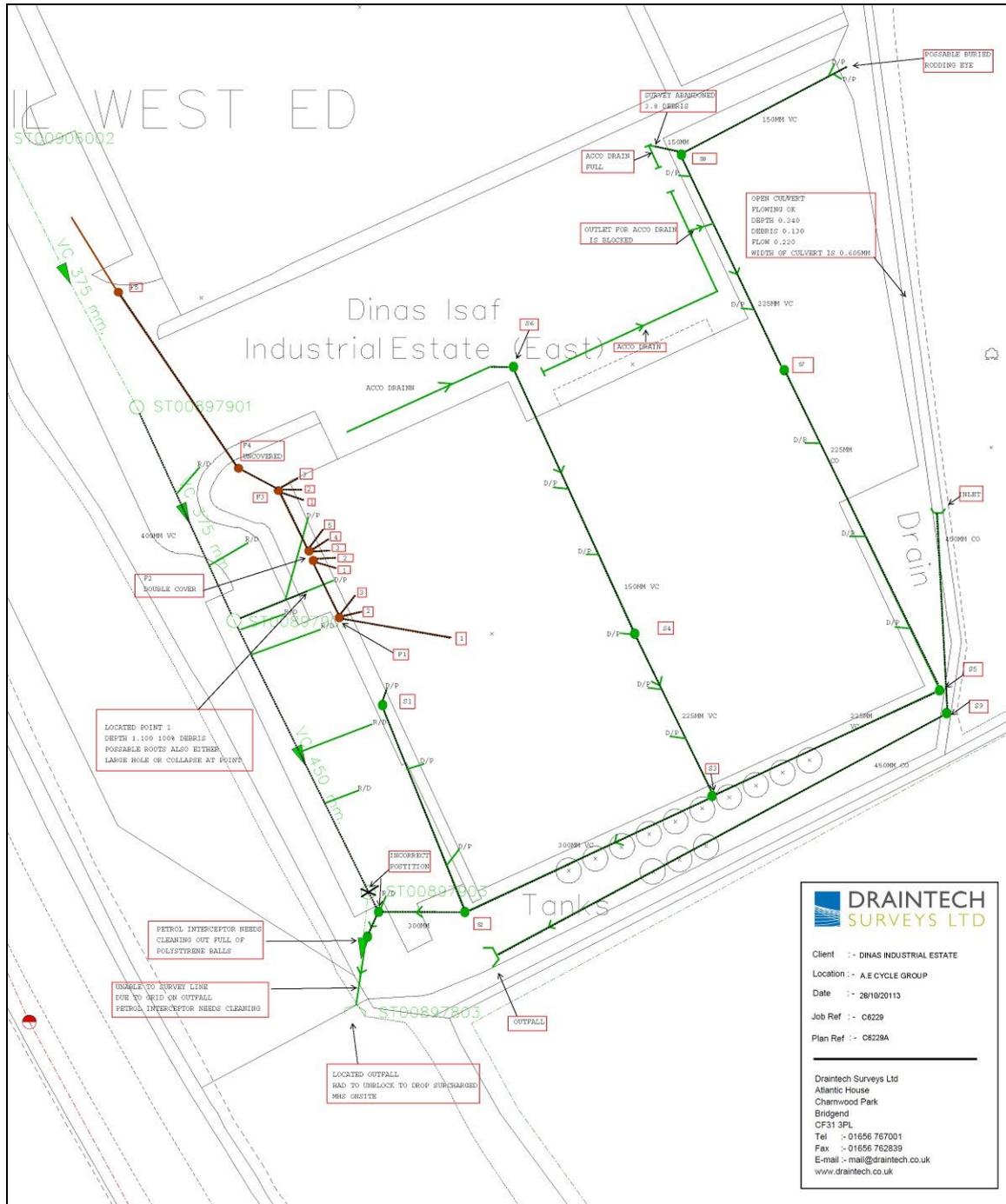
Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequence be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Releases of particulate matter (dusts) and microorganisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Medium	Medium	Medium	Permitted waste types do not include.... dusts, powders or loose fibres so only a medium magnitude risk is estimated. There is potential for exposure if anyone is living or working close to the site (apart from the operator and employees)	Do not accept dusty wastes. The site is a WEEE dismantling facility and does not accept other wastes which could give rise to dust when accepted or processed. Inspection and mitigation procedures are detailed in the EMS.	Very low
Local human population	As above	Nuisance - dust on cars, clothing etc.	Air transport then deposition	Medium	Low	Low	Local residents often sensitive to dust.	As above	Very low
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Medium	Medium	Local residents often sensitive to litter. Site does not accept waste externally and waste arrives on pallets or in containers for unloading by FLT.	As above. Mitigation measures are included in the EMS, which include inspecting for and clearing waste, litter and mud from affected areas outside the site.	Very low
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Low	Medium	Medium	Road safety, local residents often sensitive to mud on roads. Permitted wastes will not include soils or those giving rise to mud on roads. External areas are hard surfaced.	As above. Mitigation measures are included in the EMS, which include inspecting for and clearing waste, litter and mud from affected areas outside the site.	Very Low
Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Low	Low	Local residents often sensitive to odour, however permitted waste types have low odour potential.	As above. Mitigation measures are included in the EMS, which include inspecting for odour and logging complaints.	Very Low
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Medium	Medium	Medium	Local residents often sensitive to noise and vibration	As above. Mitigation measures are included in the EMS, which include inspecting for noise issues and corrective actions. The operation is within a building on an industrial estate.	Low
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	Low	Permitted wastes unlikely to attract scavenging animals and birds but may become nesting / breeding sites.	Mitigation measures are included in the EMS, which include inspecting for pests and corrective actions.	Very low
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Permitted wastes unlikely to attract pests.	Mitigation measures are included in the EMS, which include inspecting for pests and corrective actions.	Very low
Local human population and local environment	Flooding of site	If waste is washed offsite it may contaminate buildings / gardens / Natural habitats downstream.	Flood waters	Low	High	Medium	Hazardous wastes washed off site will add to the volume and hazard of the local post-flood clean-up workload.	The site is not within an area affected by flooding. NRW's website has been checked and the site is located within Flood Zone 1. The building is locked when not in operation and the only external storage of waste is a covered container.	Very low

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Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequence be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drain and ditches.	Medium	Medium	Medium	Although some permitted waste types are hazardous and some are potentially combustible, a medium magnitude risk is estimated.	Refer to FPMP for mitigation measures.	Low
Local human population and local environment.	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above.	Medium	Medium	Medium	Although some permitted waste types are hazardous and some are potentially combustible, a medium magnitude risk is estimated.	As above (excluding comments on access to waste). Permitted activities do not include the burning or heat treatment of waste.	Low
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Medium	Medium	Medium	Risk of accidental combustion of waste is moderate.	Refer to FPMP for mitigation measures. No liquid waste is accepted. Waste within the building will be dry and the container outside is covered.	Low
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Medium	Medium	Medium	Potential for loads to contain unauthorised wastes.	No liquid hazardous waste is allowed or stored on site. All loads are inspected and rejection procedures are in place.	Low
Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Medium	Medium	Medium	Potential for fire water runoff in the event of a fire.	Refer to FPMP for mitigation measures.	Low
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Medium	Medium	Medium	Potential for fire water runoff in the event of a fire.	Refer to FPMP for mitigation measures.	Low
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastrointestinal illness.	Direct contact or ingestion	Low	Medium	Low	Potential for fire water runoff in the event of a fire.	No liquid hazardous waste is allowed or stored on site. Refer to FPMP for mitigation measures.	Very low
Protected sites - European sites and SSSIs	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Low	Low	Low	Waste types accepted are not dusty or odorous and the risk of dry deposition is very low. No point source emissions. The site is at a lower elevation and would be unaffected by drainage from the industrial estate.	All manual dismantling activities are carried out within the warehouse where the operations do not generate airborne particulates. There are no associated emission points to air and dusts. Daily site inspections and regular housekeeping standards are maintained (see EMS).	Low

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Appendix 6: Drainage System Plan



DRAINTECH SURVEYS LTD

Client :- DINAS INDUSTRIAL ESTATE
 Location :- A.E CYCLE GROUP
 Date :- 28/10/2013
 Job Ref :- C8229
 Plan Ref :- C8229A

Draintech Surveys Ltd
 Atlantic House
 Charmwood Park
 Bridgend
 CF31 3PL
 Tel :- 01656 767001
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Appendix K - Site Inspection, Training and Monitoring Forms

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SITE INSPECTION FORM – ILS/RF/4

WEEK STARTING									
TYPE OF INSPECTION		FREQ	DAY						
			M	T	W	T	F	S	S
SITE ENTRANCE/NOTICE BOARD		WEEKLY							
SECURITY - GATES		WEEKLY							
SECURITY - FENCING		WEEKLY							
SITE ROADS (CLEAR FROM HAZARDS)		DAILY							
IMPERMEABLE CONCRETE AREAS		DAILY							
BUND AROUND CONCRETE PAD (INTEGRITY)		DAILY							
DRAIN (FUNCTIONING)		DAILY							
DRAINAGE SYSTEM		WEEKLY							
WASTE CONTAINERS		DAILY							
WASTE STORAGE LIMITS	PACKAGING	DAILY							
WASTE STORAGE LIMITS	SCRAP METAL	DAILY							
WASTE STORAGE LIMITS	WEEE	DAILY							
WASTE STORAGE LIMITS	CONTAINERS	DAILY							
WASTE STORAGE LIMITS	OTHER	DAILY							
WASTE STORAGE LIMITS		DAILY							
REJECTED WASTE TYPES / STORAGE		DAILY							
FIRES (ANY INCIDENTS REPORTED)		DAILY							
NO SMOKING SIGNS IN PLACE		WEEKLY							
SPILLAGES		DAILY							
SPILL KIT CONTENTS/ ABSORBENTS CHECK		DAILY							
NOISE LEVELS		DAILY							
LITTER		DAILY							
DUST		DAILY							
ODOUR		DAILY							
VERMIN		DAILY							
MUD ON ROADS		DAILY							
RECORDS		WEEKLY							
COMPLAINTS RECEIVED		AS REQUIRED							
OTHER (SEE NOTES BELOW)		AS REQUIRED							
INSPECTION CARRIED OUT BY									
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):									
CHECKED BY					SIGNATURE				
POSITION					DATE				
<i>Sheet</i>					<i>of</i>				

PREVENTATIVE MAINTENANCE CHECKLIST– ILS/RF/5	
CHECKED BY	POSITION
DATE	DATE OF LAST CHECKLIST

	EQUIPMENT ITEM					
OFFICIAL MAINTENANCE CHECK REQUIRED (Y/N)						
IF NO, DATE OF LAST CHECK						
IF YES, DATE OF NEXT CHECK						
IS ITEM IN CORRECT WORKING ORDER						
LEAKAGES OF OIL/DIESEL ON MOBILE PLANT / VEHICLES						
IF NO, WHAT REPAIRS ARE REQUIRED (USE SEPARATE SHEET IF REQUIRED)						
WERE REPAIRS DETAILED ON THE LAST CHECKLIST						
IF YES, HAVE THEY BEEN CARRIED OUT						
ADDITIONAL REPAIRS OR ACTIONS REQUIRED						

EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW - ILS/RF/6

EMPLOYEE NAME				DATE COMPLETED			
POSITION				REVIEW DUE			
TRAINER				OUTCOME	PASSED		
POSITION					FURTHER TRAINING REQUIRED		
CARRIED OUT /SIGN OFF >	Y/N	SIGNED BY EMPLOYEE	SIGNED BY TRAINER		Y/N	SIGNED BY EMPLOYEE	SIGNED BY TRAINER
ENVIRONMENTAL PERMIT				FIRE PREVENTION PLAN			
MANAGEMENT SYSTEM				FIRE SAFETY			
SITE RULES				EMERGENCY PROCEDURES			
RECORD KEEPING / TRANSFER NOTES				STORAGE /PILE SIZE LIMITS			
RECOGNITION OF WASTE TYPES				STORAGE DURATION			
SECURITY				FIRE DETECTION			
VEHICLE CHECKS				FIRE ALARMS			
PLANT OPERATION				FIRE FIGHTING EQUIPMENT			
PLANT CHECKS				FIRE WATER CONTAINMENT MEASURES			
AMENITY - LITTER, ODOUR, PESTS etc.				SPILL CLEARANCE			
NOTES AND ACTIONS:							

COMPLAINTS REPORT FORM (ILS/RF/7)

Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form ILS/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

- 1) The name, address and telephone number of the caller will be requested.
- 2) Each complaint will be given a reference number.
- 3) The caller will be asked to give details of:
 - a) the nature of the complaint;
 - b) the time;
 - c) how long it lasted;
 - d) how often it occurs;
 - e) Is this the first time the problem has been noticed; and
 - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:
 - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - b) strength and direction of the wind; and
 - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report.
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the Environment Agency and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.