

OPERATING TECHNIQUES

For



**SIMS
METAL
MANAGEMENT**

Metal Recycling Facility

At

**Neath Abbey Wharf
Skewen
Neath
SA10 6BL**

**EAWML 34092
EPR/UP3898FQ**

NRW Out of Hours Incident Number - 0300 065 3000 (press 1)

Permit Holder:

Sims Group UK Limited
Long Marston
Stratford-upon-Avon
Warwickshire
CV37 8AQ

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1. GENERAL INTRODUCTION

1.1 This Metal Recycling facility is operated by Sims Group UK Limited. It forms a strategic component of a network of recycling facilities operated by the company throughout England and Wales.

1.2 The site will undertake a range of waste management activities including;

- Storage and treatment of ferrous and non-ferrous metals;
- Storage and treatment of general mixed scrap metal;
- Storage and treatment of End of Life Vehicles;
- Storage of Lead Acid batteries;
- Storage of Waste Electrical and Electronic Equipment (WEEE).

1.3 Relevant Regulations, Technical Guidance Notes and other documentation

In accordance with the new Environmental Permitting (England and Wales) Regulations 2010, operators are required to confirm whether their proposed operation will take place in line with standards set by any relevant Environment Agency/ NRW Sector Guidance Note and legislation. Where the proposed operations will deviate from the relevant Guidance Note or where there is no guidance for the operation, the permit supporting information must include:

1. Description of the operation that will take place at the site
2. Justification of the measures that will be used to control emissions from the processes.

There is no specific Sector or Technical Guidance Note for all the operations at Skewen, however a number of documents are relevant to the operations and Sims operates in accordance with these:

- Environmental Permitting Guidance, the Waste Framework Directive, DEFRA
- Guidance on the Best Available Treatment Recovery and Recycling Techniques (BATRRRT) and treatment of Waste Electrical and Electronic Equipment Directive, DEFRA
- Environmental Permitting Guidance Waste Electrical and Electronic Equipment Directive, DEFRA
- Sector Guidance Note EPR5.06: Guidance on the recovery and Disposal of Hazardous and Non-hazardous Waste, Environment Agency

Relevant legislation covering the activities on the site is as follows:

- Waste Framework Directive
- WEEE Directive
- Hazardous Waste Directive
- ELV Directive

This document supersedes all previous Working Plans, Operating Techniques and drawings associated with EAWML 34092.

2 SPECIFIED WASTE MANAGEMENT OPERATIONS

2.1 Description of the Site

The site is located at Neath Abbey Wharf, Neath, SA10 6BL.

Appendix 1 shows all key features of the facility.

All visitors are required to report to the site office.

2.2 Operations

Treatment includes the manual sorting of scrap, separation, sorting, grading, shearing, dismantling, baling, compacting, crushing, flame cutting, depollution of end-of-life vehicles.

No wastes are disposed of at the site.

Wastes which are not suitable for the process and/or have been delivered inadvertently and are non-conforming will be held securely in a quarantine area.

The site will receive, process and recover ferrous and non-ferrous metals from scrap which ultimately will be used as a source of feedstock for the steel manufacturing industry.

End of Life Vehicles will be depolluted in accordance with ELV Regulations and applicable legislation. The site is an Authorised Treatment Facility (ATF).

Tyres will be accepted on site for storage prior to removal for processing at a suitably authorised facility.

Batteries will be accepted on site for storage prior to removal for processing at a suitably authorised facility.

WEEE wastes will be managed in accordance with the WEEE Directive and relevant legislative requirements.

Waste refrigeration units will be stored in accordance with relevant legislative requirements to prevent damage.

The requirements in paragraph 1 of Annex III to the WEEE Directive will be complied with.

2.3 Classification of the Waste Management Operations – Waste Directive Codes

In accordance with Annex IIB of the Waste Framework Directive the site activities will fall into the following:

R4	Recycling/ reclamation of metals and metal compounds
R5	Recycling/ reclamation of other inorganic materials
R13	Storage of wastes pending any of the operations R1 to R12

2.4 Locations of the Waste Management Operations

Appendix 1 shows the entire area of the site. It details key features of the facility including infrastructure, drainage and principal storage and treatment locations.

Notwithstanding the above, due to the constantly changing operational and commercial pressures of the metal industry, a degree of flexibility with regard to the storage locations is required. Depending on operational demands at any one time, it may be necessary to relocate specified activities within the overall permitted area. However, in the event of such demand, the overriding principle will always be that the operation will be carried out in such a manner to prevent any harm or risk to the environment.

2.5 Permitted Waste Types

Material	EWC code
Waste Metal from Agriculture	02 01 10
Ferrous metal filings and turnings	12 01 01
Non- Ferrous metal filings and turnings	12 01 03
Metallic Packaging	15 01 04
End of Life Tyres	16 01 03
End of Life Vehicles (polluted)	16 01 04*
End of Life Vehicles (depolluted)	16 01 06
Oil Filters	16 01 07*
ELV Components containing mercury	16 01 08*
Brake Pads NOT containing asbestos	16 01 12
Tanks for Liquified Gas	16 01 16
Ferrous metal from ELV	16 01 17
Non-ferrous metal from ELV	16 01 18
Hazardous components from ELV	16 01 21*
Non Hazardous components from ELV	16 01 22
Waste Refrigeration with ODS/ WEEE containing CFC, HCFC, HFC	16 02 11*
Non Hazardous WEEE	16 02 14
Lead batteries	16 06 01*
Ni-Cd batteries	16 06 02*
Mercury containing batteries	16 06 03*
Alkaline batteries	16 06 04
Other batteries and accumulators	16 06 05
Copper, Bronze, Brass from construction and demolition waste	17 04 01
Aluminium from construction and demolition	17 04 02
Lead from construction and demolition	17 04 03
Zinc from construction and demolition	17 04 04
Iron & Steel from construction and demolition	17 04 05

Tin from construction and demolition	17 04 06
Mixed metal from construction and demolition	17 04 07
Cables	17 04 11
Iron & Steel from Shredding	19 10 01
Non-ferrous from Shredding	19 10 02
Ferrous metal from other waste facilities (mechanical treatment)	19 12 02
Non-ferrous metal from other waste facilities (mechanical treatment)	19 12 03
Waste refrigeration equip containing ODS – household/ local authority	20 01 23*
Hazardous batteries – household/ local authority	20 01 33*
Hazardous WEEE – household/ local authority	20 01 35*
Non Hazardous WEEE – household/ local authority	20 01 36
Metals – household/ local authority	20 01 40

2.6 Waste Quantities

The total tonnage accepted per annum will be a maximum of 130,000 tonnes.

A maximum of 6,000 tonnes will be stored on site at any one time. A contingency will be in place to divert incoming wastes if necessary e.g. during breakdowns, shut downs or changes in normal operations. Site management will redirect incoming loads to other internal or external facilities as necessary e.g. Sims network of appropriately authorised sites such as those at Newport, Cardiff or Avonmouth.

A maximum of 50 tonnes of hazardous waste (excluding ELVs and WEEE awaiting manual treatment) will be stored onsite at any one time.

2.7 Hours of Operation

No limitations are imposed upon the hours of operation. The company will in normal circumstances operate between 0700 – 1900, however due to some operational requirements, in particular the loading of ships during the night hours, the site will be manned as and when necessary.

2.8 Waste Acceptance Procedures

All vehicles bringing waste to the site will be directed to the weighbridge where the paperwork is scrutinised by the Weighbridge Operator to ensure it is in line with Duty of Care requirements. Such paperwork may include weighbridge tickets, transfer notes, Hazardous Waste Consignment Notes and season tickets for contracted waste.

Weighbridge tickets are produced for all wastes delivered which contain the name of the supplier / producer, the registration number of the carrier's vehicle, details of waste type, time and date.

As far as possible all loads are visually assessed from the weighbridge, and may be rejected if the waste is found to be mis-described or non-permitted. If there are other irregularities with the paperwork, the Weighbridge Operator may also radio or telephone a designated site operative and request specific inspection of

the load when deposited at the storage area. Further inspection follows before and during the unloading stage. If the site operative is unsatisfied with any particular item(s) or indeed the whole load, its removal off-site by the driver is required or, if the Company considers it to be best environmental option, the material is quarantined pending further investigation and possible referral to Natural Resources Wales.

Non-conforming wastes will be placed immediately in a designated quarantine area until suitable disposal arrangements can be made. There will be no mixing of non-conforming (quarantined) wastes with authorized wastes. Non-conforming wastes will be stored separately where possible and when legislation requires. Any non-conforming wastes that are defined as Hazardous under the Hazardous Waste Regulations will be handled and moved off site in line with the requirements of the Regulations. Quarantine arrangements will consist of a leak proof and acid resistant box, a bin, and a gas bottle storage cage. There will be additional space onsite available e.g. – in the unlikely circumstance that a whole load requires quarantining. Quarantined wastes will be regularly removed from site to appropriately authorised facilities.

Where necessary the producer/customer and Natural Resources Wales will be informed of a rejected load and all details relating to the load recorded.

2.9 Waste Storage

Treatment of waste on site will be carried out on impermeable surface with a sealed drainage system. Clean, uncontaminated scrap may be stored on areas of hardstanding.

Sampling of the discharge point will be carried in accordance with the requirements of the site's permit.

Wastes with a potential to pollute will be stored on impermeable surface.

Storage areas will be provided with spillage collection facilities including spill kits.

2.10 Energy Usage

Sims has an Energy Policy to ensure that energy is used efficiently at the site. This scope of the Energy Group will be extended to include this facility and to identify the energy consumption and methods of saving energy at the site.

2.11 Raw Materials and Water

The set-up of plant and equipment will minimise the consumption of raw materials and water at the site.

3 EMISSION CONTROL AND MONITORING

3.1 Monitoring Programme

Visual inspections of the drainage system and surface water discharge will be undertaken weekly.

Samples will be taken on a monthly basis from the sample point as specified in table S3.1 of the permit. The samples will be analysed for Total Suspended Solids and visible traces of oil & grease as per the requirements specified in table S3.1 of the permit. Results will be submitted to NRW on a quarterly basis using 'Form water 1'. Should a breach of permit limit be detected, the breach shall be reported to the NRW and the cause of the breach investigated.

3.2 Control of Mud and Debris

It is uncommon for the operations to give rise to problems associated with the tracking off mud and debris out onto the public highway as loose flyaway material is generally not accepted or processed on site. Wastes usually arrive secure in metal side lorries, and the treated products and residues will be dispatched in a similar manner. The site will be kept clear and free of any build-up of mud and debris and a road sweeper used when deemed necessary.

3.3 Odour

The site will not pose a risk of odour related impact due to the nature of the waste and activities. Nevertheless, during inspections the presence of any offensive odours will be noted and recorded in the Site Diary. The source of any problem will be investigated and dealt with as necessary to remove the problem. Any complaints received will be recorded in the Site Diary and actioned where appropriate.

3.4 Noise and Vibration

Activities on site are managed to minimize the risk of noise or vibration related impact. During inspections the presence of nuisance noise will be noted and recorded in the Site Diary. The source of any problem will be investigated and dealt with as necessary to remove the problem. Any complaints received will be recorded in the Site Diary and actioned where appropriate.

3.5 Dust

The site will not pose a risk of dust related impact due to the nature of the waste and activities proposed. Nevertheless, during inspections the presence of any dust will be noted and recorded in the Site Diary. The source of any problem will be investigated and dealt with as necessary to remove the problem. Any complaints received will be recorded in the Site Diary and actioned where appropriate.

4 MANAGEMENT

Sims Group UK Limited currently operates an internal Environment Management System (EMS).

The management system includes standard operating procedures that minimise the environmental risks and impacts of the normal operations and include contingency plans to minimise the effect of breakdown, accidents etc. These include procedures relating to waste acceptance and environmental monitoring.

A planned programme of maintenance for all infrastructure, plant and equipment is specified in the management system. All plant is inspected and maintained in line with the manufacturer's instructions or other appropriate regime.

Sims Group UK Limited has a training and development programme designed to ensure that staff are suitably trained to undertake their duties. The roles and responsibilities of staff on site are clearly defined and training records for each member of staff maintained and reviewed regularly to ensure competence is maintained and up to date.

Key personnel have completed relevant competence assessment & Continuing Competence Assessment as applicable. Such staff will be on site to ensure that operations are undertaken in line with Sims Policy and Processes.

The site will be appropriately manned to ensure that the site operates with due regard to the prevention of environmental pollution and harm to human health and ensure that the licence requirements are fulfilled. Personnel on site will include office staff, supervisors, operational personnel, drivers and management.

All contractors visiting the site receive an induction to ensure that they are aware of the scope of their work, the accident management/emergency procedures for the site and any other management systems appropriate to their role.

Sims Group UK Limited has an Emergency Contingency Plan that together with the Environmental Management System including Operating Techniques and Environment Risk Assessment meet the requirements of the Natural Resources Wales Guidance.

In the event of an incident, details are recorded and a full review undertaken. This review will include the following:

- Cause of the incident;
- Effectiveness of management technique
- Effectiveness of Emergency Contingency Plan and Procedures; and
- Recommendations for management technique and/or emergency procedure to reduce risk of future incidents.

5 Site Records

The operator will ensure the following information is recorded:

- Site inspections by the operator or other body and any subsequent issues and corrective actions taken;
- Dispatch of records to NRW;
- Emergencies;
- Complaints and actions taken;
- Plant/equipment failure;
- Construction Work
- Maintenance
- A record of any rejection of waste;
- Technically competent manager – times on site;
- Any incidents/accidents on site and actions taken;
- Security failures;
- Severe weather conditions.

All above records will be held in the site office and will be available on request. All records, which are required under the conditions of the Environmental Permit, shall be maintained and kept secure from loss, damage or deterioration. Any records held electronically will be backed up on a regular basis.

APPENDIX 1