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Dear Mr Thompson

25 April 2013

Rees Metals Ltd.,
Environmental Management System.

I enclose a copy of the environmental management system for Messrs Rees Metals site at Pencoed Works, Bynea, Llanelli.
If there are any matters that require further attention, please let me know.
I will be discussing the details of the document with Messrs Rees Metals next week and ensuring that they understand the document's content and make whatever arrangements that are necessary to comply with the system and that a copy is held on site .

Yours Faithfully.

H. Ifon Jones.

Natural Resources Wales,
Glan Teifi,
Barley Mow,
Lampeter,
Ceredigion.
SA48 7BY

Rees Metals Ltd., Pencoed Works, Bynea, Llanelli.

Metal Recycling Facility

Environmental Management System.(ems)

Rees metal / ems
April 2013

Contents.

1. Operational Working Plan / Environmental Impact Plan & Controls.

This operational working plan / environmental impact Plan & Controls has been prepared to include the requirements contained in the Cyfoeth Naturiol Cymru (Formerly Environment Agency) guidance documents, which together with additional information and explanations may be used for reference and training purposes.
The site has been in existence as a metal recycling facility since the early 1930's, including a period during World War II when the site was used for the dismantling and recovery of parts from military aircraft for re-use.
The open area of the site is surfaced with inert material, well compacted over the long period of use and the main storage building is of structural steel construction clad with brick and steel sheeting on sides and bonded asbestos corrugated sheets on the roof and with a reinforced concrete floor.

The site will be under the management of a holder of the appropriate Certificate of Technical Competence even though the site personnel have been "brought up" in the industry and particularly on this site and therefore have considerable experience in managing the operation without any polluting incidents.
Copies of the permitted waste schedule and of this Environmental Management System will be held at the site office and available for inspection by authorised personnel.
All material imported into the site will be limited to ferrous and non-ferrous metals, non-polluting in character.

Waste Acceptance.
All scrap deliveries to the site are those in direct control of the site permit holder thus eliminating the importation of scrap from an unknown source.
No other waste carrier is permitted to deliver scrap to the site except in exceptional circumstances and only then with the written consent of the site permit holder.
The following procedure is followed by all site importation vehicles when drivers will report to the site office on arrival and deliver a copy of the relevant waste transfer documentation to the competent person on dury
The document will show -
The source of the metal,
Description of the metal,
Date Collected,
EWC code,
Registration number of the delivery vehicle.

The documentation procedure is only varied in the case of a "season ticket" arrangement where the source and scrap metal description are identical to previous deliveries.

The delivery vehicle is directed to the weighbridge (unless the consignment has been pre-weighed) and details of the gross and tare weights recorded. The vehicle will then be directed to the appropriate discharge location when the consignment will be examined for unacceptable items during discharge. In the event of an unacceptable item/s being encountered, it will be either re-loaded and returned to the source or placed in an isolation container. Details of the incident will be recorded in site diary / log and the details of the consignment noted.

Waste Export.
Scrap exported from the site will be subjected to the same transfer documentation as required under the Duty of Care responsibilities.

Scrap Processing.
Where necessary, the only on site process carried out is the segregation of scrap into ferrous, non-ferrous and cast items which are stored separately. Where necessary, scrap may be cut to size to satisfy customer requirements, the cutting being carried out on site shears or oxy-propane burning equipment.

Permitted Waste.
A full range of the permitted waste types, together with their EWC codes as scheduled in the site permit is stored and displayed in the site office.

Hours of Operation
The hours of operation permitted under the terms of site permit are -
Monday to Friday 09:00 - 17:00
Saturday 09:00 - 12 Noon
Sunday and Bank Holidays Closed.

Any valid reason for permitting acceptance and export of waste outside the above days / times will submitted to the Waste Regulator prior to the proposed dates and any emergency situation which prevents pre-notification will be subject to a report to the Waste Regulator without delay.

Site Surface Water Management Arrangements.
No liquid waste is stored on site, the site permit not permitting liquid waste acceptance nor storage.
Metals permitted under the terms of the site permit are of a type which do not produce contaminants.
Surface water drainage is by natural soakaway drainage and monitoring of the groundwater will be conducted when required by the Waste Regulator, previous sampling at monitoring points having been submitted without a requirement to continue.
Run off from the "shears" area is discharged into a 2,500litre underground tank, the shear area being surrounded by kerbs directing the run -off into the tank drain.

Site Security.
In addition to the steel palisade boundary fencing and lockable access / exit gates, the site is equipped with a security alarm system connected by telemetry to a competent person's home.
The site is subject to impromptu visits by the site operator outside permitted opening hours.

Waste Storage Arrangements.
As is the "norm" in scrap metal sites, ferrous metals are stored in the open air on hard standing and on this site, all non-ferrous metals are stored in the secure building.
Items such as gas bottles are stored in a gas bottle cage located as shown on site layout plan RM/2.

Plant Maintenance Checklist.
As the site plant is limited to three one equipped with magnet lifting and the other two with grab equipment, no formal plant maintenance register is maintained except that the site diary records maintenance details .

Training Record.
The site manning complement amounts to two staff and three site operatives and as such no formal training record system is held. Training is as advised by experts used for advice by the site manager.

Complaints Procedure.
In order to formally record details of any complaints received regarding site operations, a procedure has been set up and a copy of the pro-forma to record complaints is attached to this document.

Accident Management Plan.
The purpose of this section is to indicate the procedure undertaken for hazards, pathways and risk management for the operations undertaken at this site. The document is also reproduced in tabular form as item 8 Environmental Risk Assessment in this Environmental Management System.

Hazard.
Spillage (Solid).
Spillage of scrap metal on access routes resulting from vehicle overload or mishandling during loading.

Receptor.
Employees or site visitor.

Pathway (pathway to receptor)
Spillage not removed nor isolated.

Risk Management.
Regular site inspection.
Removal of spillage.

Consequences.
Injury to site users or damage to vehicles.

Overall Risk.
Low risk subject to inspection and spillage plan being adhered to.

2. Hazard.
Fire.
Emergency Plan describes the procedures to follow.

Receptor.
General environment and personnel within and adjacent to the permitted area.

Pathway.
Fire spread to adjacent equipment and airborne smoke or embers.

Risk Management.
Strict smoking ban implemented.
Availability and trained use of fire extinguishers.

Probability of exposure.
Low subject to application of controls.

Consequences.
Injury to site personnel.
Human health in immediate area.
Damage to plant and buildings.

Overall Risk.
Low Risk.

3. Hazard
Dust..

Receptor.
On site personnel and adjoining land.

Pathway.
Airborne.

Risk Management.
Site inspections will identify dust particularly during dry windy conditions.
Application of fine water spray from mains or mobile water bowser.

Probability of exposure.
Low.

Consequences.
Human health and environment.

Overall risk.
Low.

Hazard.
Pests (Vermin)

Receptor.
On site personnel and adjoining premises.

Pathway.
From open yard.

Risk Management
Inspection to identify infestation.
Application of rodent control by specialist.

Consequences.
Health of personnel

Overall Risk.
Low.

Rees Metals Ltd. Pencoed Works, Bynea, Llanelli.

Potentially Leaks and Spillage

Spillage Plan.

Possible pollution may result from accidental leaks or liquid spillages from plant or vehicles as no liquid waste is accepted on site.
As well as identifying the possible source of any potential contamination resulting in pollution of groundwater, the measures required to mitigate against such pollution occurring are as follows -

Spillage of polluting liquid - steps to be taken -

Site manager notified immediately.
The area surrounding the spillage to be isolated by application of absorbent granules or clean sand stored in containers inside the main building.
Sufficient absorbent granules to be applied until all liquid has been absorbed.
Contaminated granules / sand to be loaded into suitable containers (drums) and transported to a suitably permitted disposal or recovery facility.
Waste Regulator to be notified.
Full report of occurrence and action taken to be completed and recorded for reference purposes.

At the Shears, the possibility of a hydraulic oil spillage is anticipated by surrounding the equipment with a kerb to retain any spillage prior to the run-off entering the storage tank for retention prior to disposal or recovery.

Rees metals spillage

Rees Metals Ltd. Pencoed Works, Bynea, Llanelli.

Site Inspection Schedule.

Daily.

Hard standing (including surface depressions)

Site Fence and Access / Exit gates.

Equipment check - cutting equipment etc.

Weekly.

Granule / clean sand stock.

Shear tank storage capacity.

Confirmation of site checks to be recorded in site diary and any defects top be itemised. Emergency repairs to defects to be carried out during the day and permanent repairs within 7 days.

6. Accident (and Incident) Record

Record of accidents, incidents or near misses

This form could apply equally to health and safety, we are particularly interested in things that could impact on the environment for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse

It is good practice to record near misses – eg the vandals opened the valve on the tank but the bund caught everything and no harm was done. You do not have to inform us of this sort of thing.

<table>
<tr><td colspan="2">Date and time of the incident</td></tr>
<tr><td colspan="2">What happened, what was it about?</td></tr>
<tr><td colspan="2">Was anyone else aware of this – other witnesses? If so who?</td></tr>
<tr><td colspan="2">What caused it?</td></tr>
<tr><td colspan="2">What have you done to make sure that it does not happen again?</td></tr>
<tr><td colspan="2">Was there any significant pollution or environmental damage to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground or at a site of special scientific interest, or into a drain or a watercourse? If so what?

Is there a continuing threat? Yes / No</td></tr>
<tr><td>If there was (or still is), then you must take steps to prevent further damage and notify the Environment Agency on 0800 807060 and any other relevant regulators ASAP

Have you done so? Yes / No</td><td>Who did you phone?

At what time did you phone?</td></tr>
<tr><td>You must also write or send an email to confirm this to the local office (see your accident management plan for the address)
Have you done so?</td><td>Yes/No

What date did you contact?</td></tr>
<tr><td colspan="2">Please print your name and sign</td></tr>
</table>

Continue overleaf or on a separate sheet if you do not have enough room

Keep the completed form in the file to discuss with the Environment Agency when they visit.

Rees Metals Ltd.	Environmental Risk Assesment				
Waste type	Associated Hazard	Potential pathway and receptor	Risk Management	Failure Consequence	Risk.
Inert hardstanding	Dust.	Employee / public	Check - Water spray	Health	Low
	Depression	Ponding / access danger	Fill up with inert matl.	danger to access users	Low
Liquid spillage	Groundwater	Hardstanding - pathway	Spillage Plan	Pollution of groundwate	Low
	pollution	Groundwater - receptor			
		Storage tank - shear	Check capacity		Low
Flammable equipment	Fire	Fire spread, airborne embers	Smoking banned	Injury to personnel and	Low
			Fire extinguisher check	damage to equipment	
			Emergency Plan	human health in area	
Pests (Vermin)	Health.	On site personnel (receptor)	Check for infestation	Health of personnel	Low
		Adjacent premises (recptor)	Vermin Control	on and off site.	
Metal on Access route	Injury to users	Personnel - receptor	clearance	Injury to personnel	Low.

Rees Metals Ltd., Pencoed Works, Bynea, Llanelli.

Emergency Procedure - Fire

The Safety Policy adopted and implemented by Rees Metals Ltd will be strictly adhered to at all times and the following particular procedure will be the subject of training in order that employees are aware of the procedure and a copy of this procedure is displayed in the site office.

FIRE.

In the event of a fire being detected at any location within the site boundary, the following procedure will be implemented without delay.

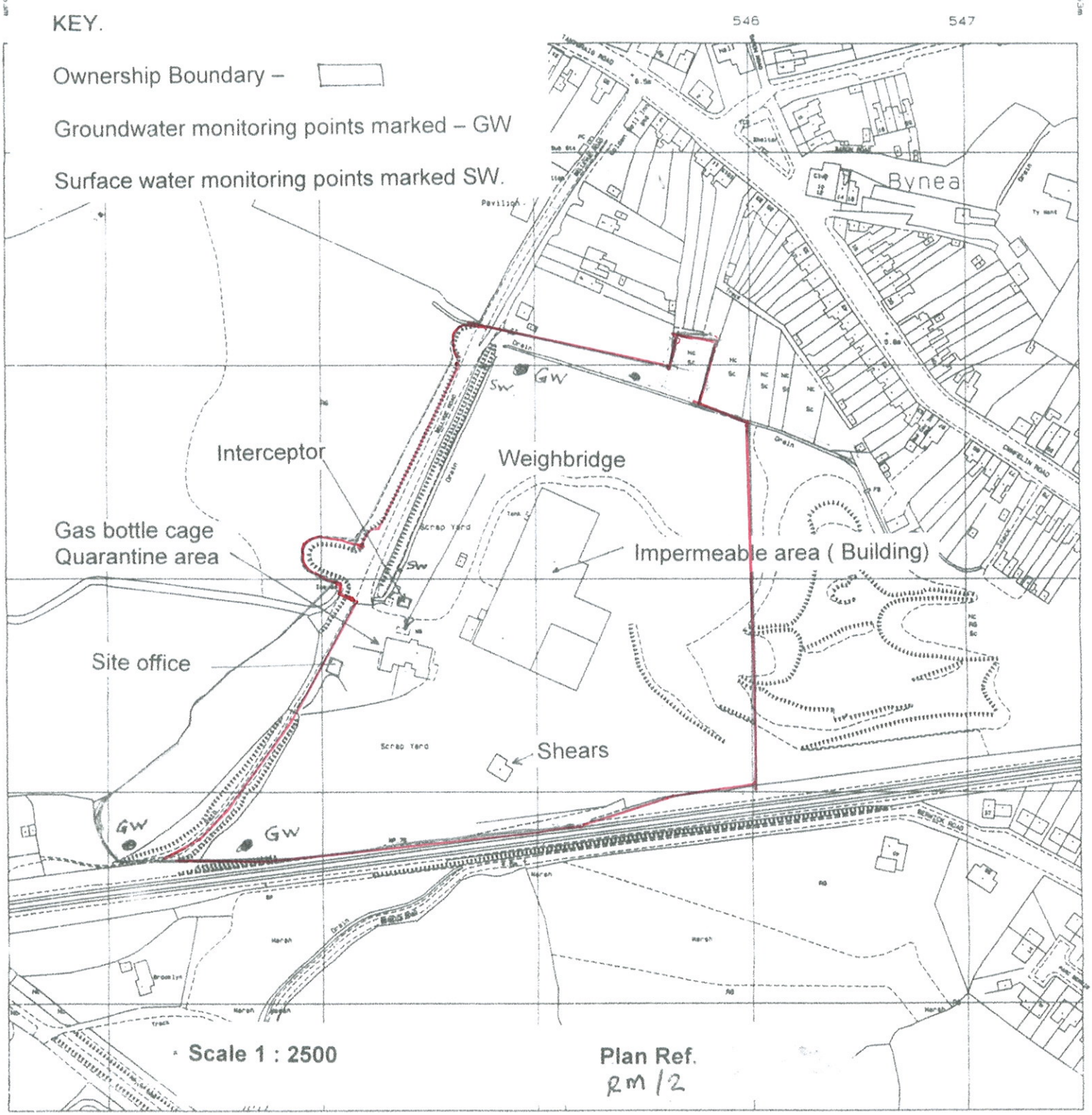
- Manager will be notified immediately
- Suitable warning bell / horn to be sounded and all personnel directed to the site entrance gate.
- No delay in evacuation should be permitted by un-necessary manoeuvring of vehicles on site.
- Fire extinguishers / water spray to be directed at the source of the fire if it is safe to do so.
- Emergency Services notified immediately.
- Report of details of incident and action taken to be prepared for future reference.

KEY.

Ownership Boundary –

Groundwater monitoring points marked – GW

Surface water monitoring points marked SW.



PENCOED WORKS, BYNEA. **REES METALS Ltd.**