

ENVIRONMENTAL MANAGEMENT SYSTEM

East Bank Road, Felnex Industrial Estate, Newport, Gwent, NP19 4PP

KDK Metals Ltd

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CONTENTS

DOCUMENT HISTORY:	I
CONTENTS	II
LIST OF TABLES	IV
LIST OF APPENDICES:.....	V
SITE INFORMATION & KEY CONTACTS LIST ** COPY FROM FPP	VI
1 GENERAL CONSIDERATIONS	1
1.1 SITE OPERATOR/PERMIT HOLDER.....	1
1.2 RELEVANT CONTACTS.....	1
1.3 SITE LOCATION	2
1.4 HOURS OF OPERATION	4
1.5 LIGHTING	4
1.6 WASTE TYPES AND QUANTITIES.....	4
1.7 EXEMPT ACTIVITIES	5
1.8 STAFFING AND MANAGEMENT	6
1.9 HEALTH AND SAFETY.....	6
1.10 FIT AND PROPER PERSONS.....	7
2 SITE ENGINEERING AND INFRASTRUCTURE.....	8
2.1 SITE INFRASTRUCTURE	8
2.2 ACCESS AND PARKING	8
2.3 SITE OFFICE.....	8
2.4 NOTICE BOARD AND SIGNS.....	8
2.5 SITE SECURITY	9
2.6 DRAINAGE.....	9
2.7 VEHICLES, PLANT AND EQUIPMENT	10
3 SITE OPERATIONS.....	11
3.1 PRELIMINARY PROCEDURES.....	11
3.2 CHECKING IN & INSPECTION OF LOADS	11
3.3 WEIGHING AND CATEGORISING LOADS	12
3.4 WASTE HANDLING - ELVs	12
3.5 ELV PROCESSING - GENERAL.....	12
3.6 REJECTED WASTES.....	13
3.7 ELV DEPOLLUTION PROCEDURE	13
3.8 FUEL AND HAZARDOUS FUEL STORAGE.....	15
3.9 REMOVAL OF BATTERIES	16
3.10 DIFFICULT WASTES - CATALYTIC CONVERTORS	16
3.11 RECORD KEEPING	17
4 ENVIRONMENTAL CONTROL, MONITORING AND REPORTING	19
4.1 BREAKDOWNS AND SPILLAGES	19
4.2 SITE INSPECTIONS AND MAINTENANCE.....	19
4.3 SITE DIARY / INSPECTION FORM	20
4.4 SECURITY MONITORING.....	20
4.5 CONTROL OF MUD AND DEBRIS.....	20

4.6	CONTROL AND MONITORING OF DUST	21
4.7	ODOUR CONTROL	21
4.8	LITTER CONTROL	21
4.9	CONTROL OF PESTS, BIRDS AND OTHER SCAVENGERS	21
4.10	CONTROL AND MONITORING OF NOISE & VIBRATION.....	22
4.11	COMPLAINTS PROCEDURE	22
5	EMERGENCY PROCEDURES	23
5.1	GENERAL	23
5.2	FIRE	23
5.3	SPILLAGES	24
5.4	DRUMS.....	25
5.5	ADVERSE REACTIONS	25
5.6	HIGH WINDS	26
5.7	POOR VISIBILITY.....	26
5.8	OPERATIONAL FAILURE.....	26
5.9	BOMB SCARE	26
6	TRAINING FOR SITE STAFF	27
6.1	TRAINING NEEDS ASSESSMENT	27
6.2	SITE RULES AND INFRASTRUCTURE TRAINING.....	27
6.3	EMERGENCY PROCEDURES TRAINING.....	27
6.4	FIRE SAFETY / FIREFIGHTING TRAINING	28
6.5	RECOGNITION OF WASTE TYPES TRAINING	28
6.6	STORAGE AREAS / LIMITS TRAINING	29
6.7	VEHICLE / PLANT PREVENTATIVE MAINTENANCE TRAINING.....	29
6.8	DUTY OF CARE TRAINING	29
6.9	PLANT OPERATION TRAINING.....	29
6.10	PERMIT / EMS TRAINING	30
6.11	TRAINING FOR CONTRACTORS.....	30

List of Tables

Table 1.1 - Waste Storage Times / Quantities5
Table 1.2 - Staffing Levels6

List of Appendices:

- | | | |
|---------------------|---|---|
| Appendix I | - | Drawings |
| Appendix II | - | Record Keeping Forms |
| Appendix III | - | Copy of Issued Environmental Permit & EWC codes |
| Appendix IV | - | Health & Safety – Conditions of Site Use |
| Appendix V | - | Depolluting End-of-Life Vehicles (cars and light goods vehicles) Guidance for Authorised Treatment Facilities (March 2011) |
| Appendix V1 | - | Management of Exempt activities |

Site Information & Key Contacts List ** copy from fpp

Site Address:	East Bank Road, Felnex Industrial Estate, Newport, Gwent, NP19 4PP		
Site Operator:	KDK Metals Ltd	National Grid Ref:	ST32527 85655

Contact	Description	Office Hours	Out of Hours
Paul Dare Helen Dare	Site Manager / TCM	07791 873124	07791 873124
Royal Gwent Hospital Cardiff Road NP20 2UB	Local NHS Hospital (Main)	01633 234234	999
	Accident & Emergency (A&E)	999, 112 or 111	999
Park Surgery 37 CHEPSTOW ROAD NP19 8XR	Local Doctor Surgery (GP)	01633 277442	999 or 112
Newport Central Police Station, Cardiff Road NP20 2EH	Local Police Non-Emergency	101 and 01633 838111	999 or 112
	Police Emergency	999 or 112	999 or 112
Maindee Fire Station ARCHIBALD STREET, NEWPORT NP19 8EP	Fire and Rescue Service (in Emergency Dial 999)	01433 232000	999 or 112
Natural Resources Wales <u>Cambria House, Newport Road, Cardiff CF24 0TP</u>	Environmental Regulator	0300 065 3000	0300 065 3000 999 or 112
Newport City Council	Planning/Environmental Health	01633 656 656	01633 656 656 999 or 112
<u>Welsh Water DCWW</u>	Mains water and Sewerage supplier	0800 052 0130 0800 085 3968	0800 052 0130 0800 085 3968
<u>Oaktree Environmental Ltd</u> - Lime House, 2 Road Two, Winsford, Cheshire CW7 3QZ	Specialist Advisor (Waste and Planning Issues)	01606 558833	999 or 112 or 0800 80 70 60

1 General Considerations

1.1 Site operator/permit holder

1.1.1 KDK Metals Ltd will operate Environmental Permit (EP). The primary operations which will take place at the site include:

- i) The importation of end-of-life vehicles (ELVs) to de-pollute, and remove all potentially hazardous components;
- ii) Separation of different elements of ELVs ie removal of batteries, tyres, engines etc. for resale; and,
- iii) Baling ELVs for recovery and removal to a suitably permitted site.

1.1.2 ELVs will be accepted from members of the public and from the commercial, industrial and agricultural sectors.

1.2 Relevant contacts

1.2.1 The contact details for the operator are as follows:

KDK Metals Ltd
East Bank Road
Felnex Industrial Estate
Newport
Gwent
NP19 4PP

Contact: Paul Dare/Helen Dare
Position: Site Manager / Technically Competent Manager
Tel: 01633 277781

1.2.2 Oaktree Environmental Ltd have been engaged to act as consultants for KDK Metals Ltd to assist in the preparation of this Environmental Management System (EMS). This EMS has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and Natural Resources Wales' Guidance on producing Environmental Management Systems.

1.2.3 Contact details for Oaktree Environmental Ltd are as follows:

Oaktree Environmental Ltd
Lime House
2 Road Two
Winsford
Cheshire CW7 3QZ

Contact: Robin Draper
Position: Senior Consultant
Tel: 01606 558833
E-mail: robin@oaktree-environmental.co.uk

1.3 Site location

- 1.3.1 The site is located on East Bank Road, Felnex Industrial Estate, Newport, Gwent, NP19 4PP as shown on Drawing Nos. 3617/2104/01 & 02. The national grid reference for the site is ST 32527 85655.
- 1.3.2 The area which is the subject of this EMS is outlined in green on Drawing No. 3617/2104/02. All references to 'the site' in this EMS shall mean this area
- 1.3.3 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC; also shown on the next page:

Table 2.1 Activities	
Position	Responsibilities
<p>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)</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>R8: Recovery of components from catalysts</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>ELVs: Treatment consisting only of depollution of waste motor vehicles and sorting, separation, baling, compacting, or cutting using hand-held equipment only, of waste into different components for recovery.</p> <p>There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes.</p> <p>The maximum quantity of hazardous waste treated for disposal or recovery shall not exceed 10 tonnes per day. This does not include the manual de-pollution of waste motor vehicles.</p> <p>Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery.</p> <p>The maximum quantity of hazardous waste stored at the site shall not exceed 10 tonnes at any one time of which no more than 10 tonnes shall be stored for disposal. This does not include waste motor vehicles awaiting manual depollution.</p> <p>No more than 40 tonnes of intact waste vehicle tyres (waste code 16 01 03) shall be stored at the site.</p>

1.4 Hours of operation

- 1.4.1 The site will be open for the delivery and receipt of waste on site and for all waste handling/processing operations according to the hours specified below:

Monday to Friday	08.00 – 17.30
Saturday	09.00 – 13.00
Sundays, Bank/Public holidays	Closed

- 1.4.2 The only activities on site which will be permitted outside of these hours are onsite maintenance works and general office use.
- 1.4.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised vehicular and/or pedestrian access.

1.5 Lighting

- 1.5.1 During official lighting up times or during times of low light the site has sufficient lighting within the working areas to permit effective inspection of waste and ensure that safe working practices are maintained on site.

1.6 Waste types and quantities

- 1.6.1 The waste types to be accepted at the site are those as defined in the Controlled Waste (England & Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990 consisting of End-of-Life motor vehicles [ELVs] (including hazardous wastes such as lead acid batteries and catalytic convertors which form part of, or are contained in, a waste motor vehicle and were necessary for the normal operation of the vehicle).
- 1.6.2 The site will also accept some components (including hazardous) removed from cars as they are occasionally found within vehicles and rejection of such components may lead to fly tipping. For example, if a customer has some oil filters to dispose of with their vehicle the filters will be accepted and deposited appropriately at the site (under exemption).

- 1.6.3 A detailed breakdown of wastes from the European Waste Catalogue (EWC) - Commission Decision 2000/532 accepted at the site is shown in Appendix III.
- 1.6.4 The throughput of the site will be limited to <2,500 tonnes per annum consisting of undepolluted and de-polluted ELVs.
- 1.6.5 Table 1.1 below indicates the approximate storage quantities of the waste as shown on Drawing No. 3617/2104/03 with residence times for each waste type.

Table 1.1 - Waste Storage Times / Quantities

Waste Stored	Form	Storage Time (indicative)	Max. Volume of Waste Stored (m³) or tonnes
Undepolluted ELVs	Unprocessed	<48 hours	10 ELVs (approx. 60m ³)
Drained fluids from ELVs	Unprocessed	Removed from site once container full	3 x IBC's
Waste tyres	Separated	Removed from site once container full	One container i.e. 35m ³
Depolluted ELV shells	Processed	<3 months	20 ELVs (approx 120m ³)
Baled ELV shells	Processed	<6 months	30 (<50 tonne)
Non-Ferrous Metals	Processed	Stored under Exemptions S2/T4/T9	5 tonnes in Building Externally as per Exemption limits. See Appendix VI
Batteries	Unprocessed	Stored under Exemption T9	<3 tonnes

1.7 Exempt activities

- 1.7.1 Activities which are outside the scope of the EP for the site (listed in Schedule 3 of The Environmental Permitting (England and Wales) Regulations 2010) will be carried out at the site Exemptions T4, T9 and S2 are registered with NRW. These include the storage of batteries and tyres. A written Management System for handling wastes under these exemptions will be in place on site. Appendix VI details the storage and treatment operations operated under the Exemptions.

- 1.7.2 Wastes brought onto site as part of an exempt waste activities and not part of the accepted waste types shown in Appendix III will be kept clearly segregated and identified from those wastes imported for the specified waste management operations.
- 1.7.3 Registration - a copy of all exemption notifications and register entries will be held in the site office. Registered exemptions are valid for a period of 3 years. If the activity is to be carried on after 3 years, a renewal should be submitted to NRW.

1.8 Staffing and management

- 1.8.1 The site will open for the deposit of waste or for other essential operations during the hours listed in Section 1.5. Table 1.2 below details the staff structure of the site when operating at full capacity. Positions in bold italic print below are the minimum staff requirements when the site is open for the reception of waste:

Table 1.2 - Staffing Levels

Position	Employees	Responsibilities
Site manager	1 (<i>1</i>)	Overseeing all activities which take place at the site
Admin / Office Staff (TCM)	1 (<i>1</i>)	Co-managing site and administration
Machine / Plant Operator / General Operatives	2 (<i>1</i>)	Waste handling/processing, reception and plant operation

1.9 Health and safety

- 1.9.1 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. Conditions of site use for employees, visitors and contractors are shown in Appendix IV. These conditions will be shown to all site users and must be signed prior to using the site. Anyone refusing to comply with the conditions of use will be asked to leave the site.

1.10 Fit and proper persons

- 1.10.1 The site will be assigned a Technically Competent Manager (TCM) who will provide the required attendance time at the facility as required by guidance periodically issued by Natural Resources Wales (NRW). A copy of TCM's Certificate of Technical Competence (COTC) will always be made available in the site office. The relevant award is the WAMITAB Level 4 Medium Risk Operator Competence for Physical Treatment; otherwise known as MROC2.
- 1.10.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with the EP and this EMS document in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person. If either the TCM or deputy is changed, NRW will be informed of the change and the relevant details of the replacement as soon as possible.
- 1.10.3 At the time of this EMS production, none of the relevant people associated with the operator had been convicted of a relevant offence.

2 Site Engineering and Infrastructure

2.1 Site infrastructure

2.1.1 The site's infrastructure is detailed on Drawing No. 3617/2104/03.

2.2 Access and parking

2.2.1 The site is accessed from East bank Road and benefits from an existing access; car parking is available on East Bank Road.

2.3 Site office

2.3.1 The site office is shown on Drawing No. 3617/2104/03 and the list below details the relevant site documentation which will be kept in the site office.

Documents to be retained in site office
The Environmental Permit (original & any subsequent variations) This Environmental Management System (NRW agreed document) Current site diary (to record all inspections/visitors to the site) Natural Resources Wales inspection (CAR) forms In-house inspection sheets/recording forms Duty of care transfer notes (for 2 years minimum) Hazardous waste consignment notes (rejected waste, etc., kept for 3 years) Waste delivery tickets Accident book (& 1st aid kit)

2.4 Notice board and signs

2.4.1 A notice board is erected at the site entrance displays the following information:

- The site name and address.
- The name of the permit holder and operator.
- The Environmental Permit number and accompanying statement stating that the site is permitted by Natural Resources Wales.
- Natural Resources Wales' contact details, Emergency Tel No. 0300 065 3000 and

- General Enquires Tel No. 0300 065 3000
- Operator's "out of hours" emergency contact details (telephone number).
- Operating hours.

2.4.2 Additional signs are displayed around the site for operational / health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

2.5 Site security

2.5.1 **Gates** - The main entrance gates are located as shown on Drawing No. 3617/2104/03 and are of galvanised steel construction. The gates remain padlocked when the site is unmanned.

2.5.2 **Fencing** - The site is fully secure and bounded in part with 4m concrete panel fencing and in part with 2m high steel paling fencing.

2.5.3 Further to the above infrastructure, the site benefits from 24 hour remotely accessible CCTV and an intruder alarm system also connected remotely to the site manager.

2.6 Drainage

2.6.1 All surface water falls to into gulley pots and connects to the foul sewer. Details of the above are shown on the Layout & Fire Plan. Oils from depolluting vehicles are collected into bunded 1,000 litre containers or 415litre drums.

2.6.2 The tanks are monitored daily and emptied and sent to a suitably permitted facility for recovery.

2.6.3 The toilet/welfare in the site office and the toilet and sink inside the de-pollution building also connect to the foul sewer system.

2.7 Vehicles, plant and equipment

- 2.7.1 Waste is handled using the plant listed below. Additional plant will be hired to cover any very busy periods. Only trained operators are permitted to drive/operate the plant listed below. Any changes to the list will be notified to NRW prior to implementation. The minimum requirements when the site is operational are shown in bold italic print.

Item	Number	Function
Scrap handler	1	Loading/unloading/movement/sorting
Forklift truck	1	Loading/unloading/movement/sorting
Shear/Baler	1	Size reduction of ELVs / scrap metal
Depollution ramps/rigs	2	Depolluting / dismantling ELVs

- 2.7.2 The plant / equipment on site may vary depending on the amount of waste to be processed / treated. The list is the maximum that will be on at site at any one time. When the site is closed there may be periods when no plant/equipment is kept on site.

3 SITE OPERATIONS

3.1 Preliminary procedures

- 3.1.1 Guidance will be given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types and operations which are acceptable at the site i.e. a copy of Appendix III of this EMS. The site will be used for waste from third-party users or the operator's own vehicles, whose details will be checked prior to delivery of waste to the site. The procedures below are followed prior to the receipt of waste on site.

3.2 Checking in & inspection of loads

- 3.2.1 All persons delivering waste to the site are required to report to the site office upon arrival (including employees of the operator).
- 3.2.2 **ELVs** - Where registration documents are available these are used to confirm vehicle details. However, vehicles arriving via insurance companies are unlikely to possess such documents.
- 3.2.3 A visual inspection of the ELV will be carried out by a designated employee of the operator and the accompanying paperwork will be checked. If a leak is found, the leaking fluids will be drained immediately and stored in the appropriate manner and spillages dealt with in accordance with Section 5.3. If unauthorised waste is discovered inside a vehicle after receipt, two courses of action are available:
- i) Return the vehicle to the producer and advise NRW of the deposit; or,
 - ii) Where the producer/owner of the vehicle has left the site and cannot be contacted or where the removal off-site of the waste may cause further problems then the waste will be deposited in the quarantine skip. NRW will then be contacted to agree a course of action if the waste is difficult to handle or hazardous.

- 3.2.4 Provided that the vehicle meets the acceptance criteria (as judged visually by a trained member of staff or the operator) then the vehicle will moved into the de-pollution building and onto the de-pollution rig to await processing.
- 3.2.5 If the ELV requires assessment by an insurance company it will be marked as such and stored in a designated area and labelled for storage of 'insurance vehicles'. Upon completion of assessment the vehicle will be ready for processing or repair.
- 3.2.6 If the ELV is delivered by a private party or is not required for insurance assessment then it will be taken directly to the un-de-polluted vehicle storage area to await processing inside the de-pollution building for de-pollution.

3.3 Weighing and categorising loads

- 3.3.1 The weight of ELVs will be estimated by class category or vehicle documentation. The weight of delivered vehicles may be recorded as the standard/plated net weight for that type of vehicle, if whole. These weights are required for each ELV delivered to the site to ensure that the site complies with recycling targets and throughput limits.

3.4 Waste handling - ELVs

- 3.4.1 Schedule 5 of the End-of-Life Vehicles Regulations 2003 sets out the minimum technical requirements for keeping and treating ELVs. The site will operate to the standards set out in these Regulations or any later standard.
- 3.4.2 Any vehicles received which are already de-polluted may be taken directly to the appropriate area as shown on Drawing No 2104/3617/03.

3.5 ELV Processing - general

- 3.5.1 The site is not intending to break the ELVs for spare parts. Once depolluted the engines will be removed and the shells baled using the on-site shear and bale forming machine.

3.5.2 Batteries will be stored under a S2 exemption in segregated containers to await removal from site to a suitably permitted or exempt facility for further recycling.

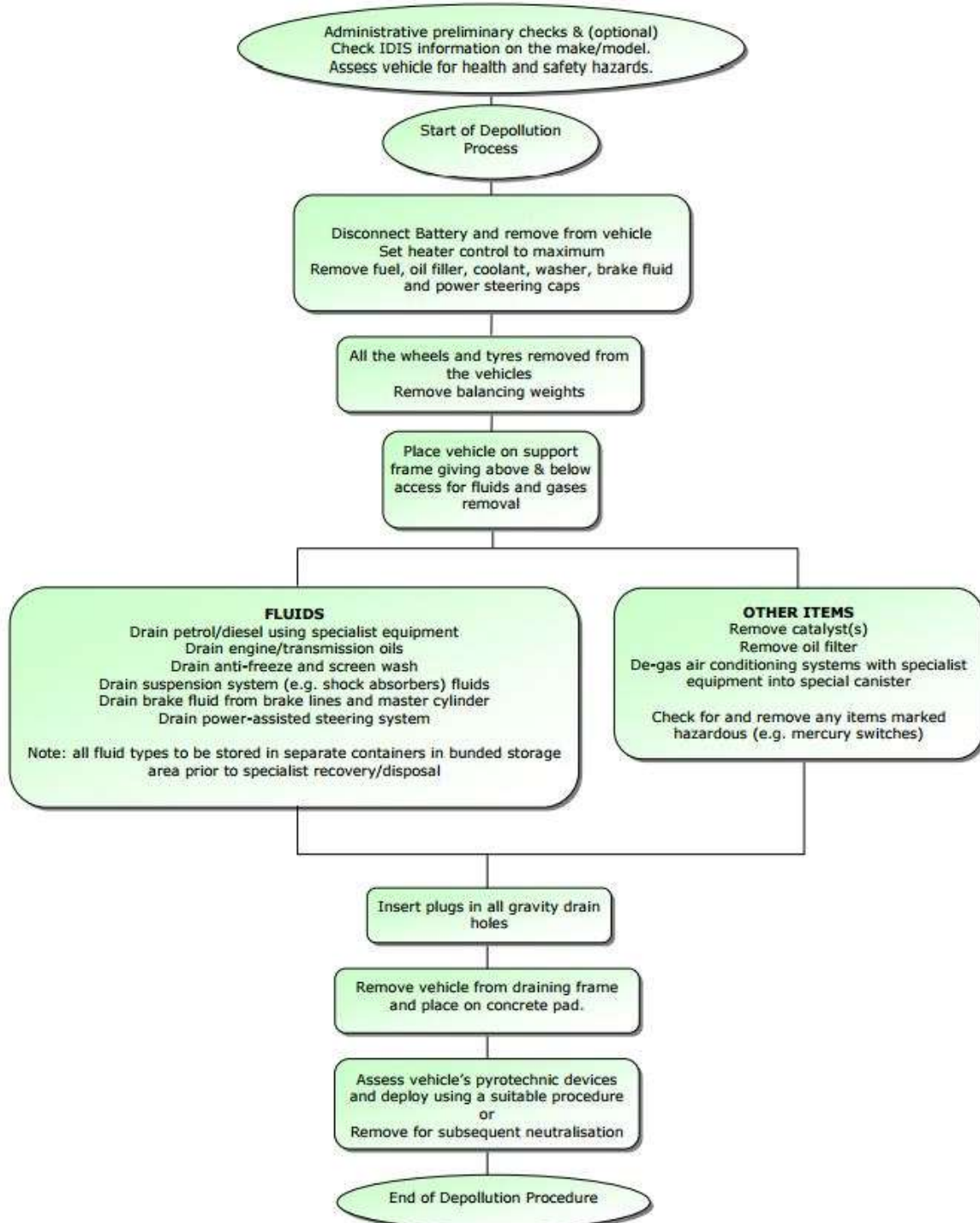
3.5.3 Tyres will also be stored in segregated stockpiles under the S2 exemption.

3.6 Rejected wastes

3.6.1 Rejected wastes will be deposited in the quarantine skip provided for non-conforming wastes. This will occur when non-conforming waste is discovered after the receipt of an ELV or where the removal off-site of the waste may cause further problems. NRW will then be contacted to agree a course of action where necessary. The contents of the skip will be recorded in the site diary.

3.7 ELV depollution procedure

3.7.1 Each ELV will be treated as set out in the DEFRA / DTI publication “De-polluting End-of-Life Vehicles: Guidance for Authorised Treatment Facilities” as summarised below:



3.7.2 A suitable absorbent and full spill kit will be kept by the depollution rig in the event of any spillages of oil or fuel. Any contaminated absorbent will then be removed to an appropriately permitted disposal facility.

3.7.3 The de-pollution area will be a scissor lift on which the vehicle will be placed to allow operatives to safely remove the hazardous components and fluids to render the car as

non-hazardous waste. The surface of the depollution area will be a containment area to ensure the containment of any spillage of liquids/fluids drained from the vehicle.

- 3.7.4 The de-polluting equipment to be installed at the site will be similar to that manufactured by Autodrain. This equipment is designed specifically for the de-pollution of ELVs and includes tanks to 'suck out' the fluids (see below):



- 3.7.5 A trained member of staff is normally able to complete the de-pollution process in 15 - 20 minutes. Once vehicles have been de-polluted they will be removed as soon as practically possible.
- 3.7.6 Once ELVs have been subjected to the de-pollution process, de-polluted ELVs will be stored in the external yard to await baling as shown on Drawing No. 3617/2104/03.
- 3.7.7 If the maximum storage capacity of ELVs at the site is reached then no further ELVs will be accepted until vehicles have been removed off site to a suitably permitted site. The operator will contact NRW or Oaktree Environmental Ltd to calculate the waste capacity of the site if deemed necessary.

3.8 Fuel and hazardous fuel storage

- 3.8.1 All hazardous liquids removed from the vehicles will be stored in the depollution building which has impermeable concrete surfacing and sealed drainage.
- 3.8.2 The tanks/containers to be used for the storage of fuel or hazardous fluids will be surrounded by a bund which is capable of containing a minimum of 110% of the volume of fuel stored in the tank(s). All pipework and associated infrastructure will be enclosed

within the bund and a lock will be fitted to the tank valve to prevent unauthorised operation. Any storage of oil will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 SI No.2954 or any subsequent legislation. All valves and gauges on the tank will be constructed to prevent damage caused by frost. The tanks will be clearly marked showing their capacity and product within.

3.8.3 Quantities of fluids in the drums/tanks which are topped up during the de-pollution process will be monitored on a daily basis to ensure there is adequate capacity on site. Fluids will be collected on a contract basis by reputable contractor who is a registered carrier of hazardous waste.

3.8.4 Fuel and hazardous fuel storage containers are located as shown on Drawing No 3617/2104/03.

3.9 Removal of batteries

3.9.1 **Batteries** - Batteries removed from vehicles will be handled as follows:

- a) Lead acid batteries are stored in containers with an impermeable, acid resistant base and a cover to prevent ingress of water. Containers can hold up to 1 tonne of batteries and will be covered and stored in the de-pollution building. Daily checks will be made on the containers.
- b) A suitable absorbent agent will be kept within the external yard so that prompt action can be taken to absorb any spillages. Any contaminated absorbent material will then be removed to an approved disposal facility.
- c) Removal of batteries will be carried out in accordance with the Hazardous Waste (England & Wales) Regulations 2005 (HWR) (as amended) or any subsequent amending legislation.

3.10 Difficult Wastes - catalytic convertors

3.10.1 Catalytic Convertors removed or accepted from ELVs will be stored in a 45 gal drum or open topped IBC in the de-pollution building.

3.10.2 The above will have the same procedures in place as shown in Section 3.10.

3.11 Record keeping

3.11.1 The details below will be recorded by the operator and kept in paper and or electronic format the site diary.

3.11.2 The following details where requested by the duty of care are recorded for every load deposited at the site:

- The date and time of delivery.
- The name and address of the waste producer.
- The detailed and accurate description of the waste including type, quantity (in tonnes or cubic metres) and EWC codes.
- How the waste is contained e.g. loose, container type.
- The carrier's name and address.
- Driver's name, signature and vehicle registration No.
- Signature or initials of persons producing/accepting/inspecting/carrying the waste.
- Additional handling details/notes made by the driver after inspection of the load (where applicable).
- SIC code of the premises which produced the waste.
- Waste hierarchy declaration.
- Information on previous treatment of the waste e.g. manual or mechanical.

3.11.3 The following details will be recorded for all deposits of non-conforming waste at the site and will be forwarded to NRW, where required:

- Date and time of deposit.
- A detailed and accurate description of the waste including type and EWC code.
- The quantity of waste (in tonnes or cubic metres).
- How the waste is contained e.g. loose, container type.
- Name, address and telephone No. of waste producer.
- The carrier's name, registration number and vehicle registration.

- Signature or initials of persons who produced, accepting/inspecting and carrying the waste.
- Reason for the rejection of waste and action taken.

3.11.4 The following details will be recorded for every load of waste leaving the site, where required by the duty of care:

- The date and time of removal.
- Detailed and accurate description of the waste including type, quantity of waste (in tonnes or cubic metres) and EWC codes.
- How the waste is contained e.g. loose, container type.
- The destination waste management site or exempt facility.
- The name and registration No. of the carrier or employee removing the waste (if applicable) and vehicle registration No.
- Signature or initials of persons i.e. transferor, transferee and carrier of the waste.
- SIC code of the premises transferring the waste.
- Waste hierarchy declaration.
- Type of treatment waste subjected to (if relevant) e.g. manual, mechanical.

3.11.5 A summary of waste types and quantities deposited at and removed from the site and origin and destination details will be forwarded to NRW using the standard waste return form by the 31st January each year as specified in the site's EP.

3.11.6 Outcomes of inspections of waste types, hardstanding areas, transfer/treatment areas, storage areas, drainage etc., are recorded and detailed comments entered into the operator's site diary (including action taken or proposed).

3.11.7 Visitors to the site will sign the visitor's book upon arrival and exit stating the purpose of their visit and whom they represent.

3.11.8 Complaints will be recorded using the operator's site diary or complaints record form shown in Appendix II.

4 ENVIRONMENTAL CONTROL, MONITORING AND REPORTING

4.1 Breakdowns and spillages

- 4.1.1 In the event of breakdown or malfunction to plant, equipment or infrastructure, alternatives will be brought on site until repaired. If alternatives cannot be sourced then waste and operations will be managed to ensure the item is repaired. The repair will be carried out at the most convenient location with absorbents used to clear any oil or fuel spillages.
- 4.1.2 All site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a skip for disposal to a suitably permitted site.
- 4.1.3 Any spillages of fuel/oil will be cleared immediately by depositing sand or absorbents on the affected area. The sand or absorbents will be placed in a skip to be taken to a suitably permitted site for recovery/disposal. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur. Spillage clearance procedures are detailed in Section 5.3. Sand and absorbents will be stored on site.
- 4.1.4 All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or are temporarily suspended.

4.2 Site inspections and maintenance

- 4.2.1 The inspection frequencies for maintenance/housekeeping are listed on record form KDK/RF/4. The inspection form will be completed by a person who is familiar with the requirements of the EMS and EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in the site diary. All repairs will be carried out within 5 working days unless agreed otherwise with NRW.

- 4.2.2 All repairs to site security including gates and fencing will be made within 5 working days of the discovery of the damage and the site will be made secure until the repair has been completed.
- 4.2.3 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired immediately in which they are found, where possible. If a repair is not possible NRW will be contacted to agree a suitable timescale for repair.
- 4.2.4 All defects and problems likely to give rise to pollution will be recorded on the form KDK/RF/4 with repairs/solutions being carried out immediately.

4.3 Site diary / inspection form

A site diary for the purpose of recording site activities will be maintained in addition to record form KDK/RF/4. The diary will also be used to record any other information relevant to the working of the site. The following information will be recorded in the diary/record forms required by the EP:

- i) The identity of the signature of the inspection personnel;
- ii) The date and time of the inspection (or event);
- iii) The inspection details and any actions taken; and,
- iv) The name of the nominated deputy in the absence of the site manager.

4.4 Security monitoring

- 4.4.1 The site is partially bounded in 4m high concrete panel fencing and partially by 2m high steel paling fencing. There are security cameras in place which can be monitored remotely.

4.5 Control of mud and debris

- 4.5.1 Although unlikely to present a problem, due to the nature of the waste accepted at the site and the site surfacing, visual inspections of the site will be carried out daily (see

KDK/RF/4). However, staff will report any problems with mud or debris at the site immediately to the site manager.

- 4.5.2 The deposit of material on the site access public highway will be treated as an emergency and will be cleared immediately by the operator using either a brush and shovel or vacuum tanker/road sweeper if necessary.

4.6 Control and monitoring of dust

- 4.6.1 The containment of waste within the site and the nature of the wastes accepted at the site (ELVs) present a very low risk of dust. If dust were to become a problem at the site, a permanent water supply is available on site in all climatic conditions to ensure that the dust suppression can function effectively. Any external water pipes will be lagged to prevent frost damage during winter months.

4.7 Odour control

- 4.7.1 The containment of waste within the site and the nature of the wastes accepted at the site (ELVs) present a very low risk of odour nuisance. If malodorous waste is deposited on site it will be consigned to a skip for rejected waste or removed from the site immediately.

4.8 Litter control

- 4.8.1 Although unlikely to present a problem, due to the nature of the waste accepted at the site, daily inspections of the site boundary will be carried out for the presence of windblown litter and operatives will be instructed to collect the litter and place it in a skip for disposal/recovery before the end of the working day.

4.9 Control of pests, birds and other scavengers

- 4.9.1 It is unlikely that vermin will present a problem, due to the waste types handled at the site, but a recognised pest control contractor will be brought in within 48 hours if any problems are encountered. The site will be inspected daily for the presence of vermin and the results of the inspection noted in the site diary or site inspection form.

4.10 Control and monitoring of noise & vibration

4.10.1 The site is operated using the Best Practicable Means at all times to ensure that all plant and equipment does not exceed agreed background levels by more than 5dB, measured at the nearest noise sensitive property.

4.10.2 The following table below sets out:

- The likely sources of noise arising from the development.
- The actions to be taken / procedures to be followed or planned in order to prevent or minimise levels.

NOISE PROBLEM	ACTION TO BE TAKEN TO PREVENT OR MINIMISE NOISE
Vehicles travelling to and from the site for delivery/collection of wastes/products.	All vehicles are required to be driven onto and off site with due consideration for neighbours. Access road to site should be maintained in good state of repair to prevent.
ELV deposit on site	Vehicles must be well maintained and operated with silencers. Moving parts to be regularly lubricated. All vehicles must be driven slowly around the site. Engines to be switched off when not in use. Reversing alarms to be preferentially fitted with white noise alarms to minimise impacts on neighbouring sites.
Small vehicles travelling to and from the site (e.g. staff and visitor's cars, courier van deliveries etc.)	All those working on and visiting the site to be made aware of need for considerate driving and keeping vehicles well maintained. Small vehicles will arrive marginally earlier than the main site operating hours.

4.11 Complaints procedure

4.11.1 All complaints will be recorded on KDK/RF/6 and will include a record of the complaint, particulars of the complainant and details of any action taken to alleviate the problem.

5 EMERGENCY PROCEDURES

5.1 General

- 5.1.1 In addition to obligations imposed by RIDDOR '13 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) the permit holder will notify Natural Resources Wales' of any serious injuries to employees of the operator, other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes etc. will be recorded in the accident book on site. Separate procedures will be used for different types of emergency. An emergency at the site is defined by the site management as follows:

“Any incident which is likely to result in harm to human health or pollution of the environment or serious breach of permit conditions and serious detriment to the amenities of the locality.”

- 5.1.2 For all emergency situations, the deposit of any further waste will be suspended where necessary to allow action to be taken safely. If necessary, staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards. Staff handling the emergency will be provided with and trained to use the necessary PPE (personal protective equipment) unless the manager instructs them that the hazard is too severe and outside help is needed from the emergency services or specialist waste contractors. A visitor's book will be kept to check who is on site at all times.

5.2 Fire

- 5.2.1 The site has an FPP which is referenced as 3617-2104-B and available to all staff/visitors at the site and kept in the site office.

5.2.2 For quick reference, the following actions will be taken when fire is detected or suspected (Site operatives):

- a) DONT PANIC
- b) RAISE THE ALARM (IF NOT DONE SO ALREADY)
- c) NOTIFY THE SITE MANAGER (IF SAFE TO DO SO)
- d) DO NOT TRY TO TACKLE THE FIRE YOURSELF UNLESS YOU ARE TRAINED IN DOING SO AND YOU ARE SURE OF THE NATURE OF THE FIRE
- e) LEAVE THE BUILDING USING THE NEAREST EXIT (I.E. FIRE DOOR OR ROLLER SHUTTER DOOR) AS QUICKLY AND AS ORDERLY AS POSSIBLE
- f) ASSEMBLE AT THE SPECIFIED FIRE ASSEMBLY POINT WHICH IS LOCATED BY THE SITE ACCESS GATES.
- g) THE SITE MANAGER OR DELEGATED OPERATIVE WILL BE IN CHARGE OF CALLING THE EMERGENCY SERVICES ON "999" AND ENSURING THAT ALL PERSONS WHO WERE WORKING IN THE BUILDING ARE ASSEMBLED SAFELY
- h) INFORM ALL NEIGHBOURING PREMISES WHO ARE LIKELY TO BE AFFECTED
- i) INFORM NATURAL RESOURCES WALES
- j) DO NOT RETURN TO THE SITE UNTIL YOU HAVE BEEN GIVEN THE 'ALL CLEAR' BY THE EMERGENCY SERVICES AND THE SITE MANAGER

5.3 Spillages

5.3.1 All fuel stored on site are banded to contain any fuel leaks. Any oil and vehicle maintenance chemicals kept on site will be securely stored. If any spills occur, a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted site for recovery/disposal. No chemical leaks are expected in the waste handling area but should they occur the procedures outlined in Section 5.4 will apply.

5.4 Drums

5.4.1 The deposit of drummed waste will not be allowed at the site. If a drum is concealed within a vehicle and is not observed until the vehicle has been deposited on site then the following procedure will apply:

- i) The staff member will visually check the condition of the drum from a safe distance, noting any labels referring to the possible contents or hazards.
- ii) The site manager will be contacted to verify the observations and to decide on further action.
- iii) The producer of the waste and NRW will be contacted for advice and further information if necessary and both will be informed that a breach of the Duty of Care and site permit conditions has occurred as the result of the unauthorised deposit.
- iv) No further waste will be deposited until the emergency has been dealt with.
- v) All spillages will be cleared using a spill containment kit and all contaminated absorbents placed in a skip for disposal to a suitably permitted waste management site.
- vi) If the deposit results in serious reactions with other waste or harmful emissions or the drum contents cannot be identified, then the emergency services and/or specialist waste contractors will be brought in to assist. If necessary, staff will be evacuated from the site or to a safe area within the site.

5.5 Adverse reactions

5.5.1 No wastes are accepted which will react to present such a hazard. If unauthorised waste is found in a skip and does present such a hazard the same procedures as for the deposit of drums (above) shall apply.

5.6 High winds

- 5.6.1 There will be no sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds. Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.

5.7 Poor visibility

- 5.7.1 The site will not operate in conditions of poor visibility such as dense fog to reduce the risk of vehicle collision.

5.8 Operational failure

- 5.8.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

5.9 Bomb scare

- 5.9.1 In the unlikely event of a bomb scare, the site will be evacuated and the police contacted. The police will then assume control of the site until the threat has been verified or the device defused and removed. NRW will be kept informed of the events on site.

6 Training for Site Staff

6.1 Training needs assessment

- 6.1.1 All new and existing site staff are subject to a specific training regime based on their responsibilities at the site to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.
- 6.1.2 An employee training record (KDK/RF/5 in Appendix II) shall provide a comprehensive checklist for the training needs of all new site staff and also serves as a training review for existing site staff which will be carried out annually.

6.2 Site rules and infrastructure training

- 6.2.1 This information will be provided to all employees, visitors and contractors with a full understanding of the site's conditions of use, which will be communicated and documented at induction for all staff with specific induction for visitors and contractors.
- 6.2.2 Competency should be demonstrated within this field to ensure the employee is fully aware of the site's surroundings and operations to ensure their safety and compliance with specific operating conditions at the site.

6.3 Emergency procedures training

- 6.3.1 All employees will be required to be familiar with the Environmental Controls in Section 4.0 and the Emergency Procedures as detailed in the Section 5.0.
- 6.3.2 In addition to normal operating conditions as specified in the site rules, employees must also be trained in dealing with eventualities which may occur outside the scope of normal operating conditions, so they are aware of how to deal with these situations in advance of an occurrence.

6.4 Fire safety / firefighting training

- 6.4.1 Management must provide all employees with appropriate fire safety training with regard to their individual responsibilities.
- 6.4.2 Emergency procedures detailing what measures employees should adopt should a fire occur at the site are detailed in Section 5.2 and will be covered by the 'emergency procedures' training (see Section 6.3). Staff will also be familiar with the site's FPP.
- 6.4.3 Regular fire drills will be undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs. These will be unannounced drills and will not form part of the induction or review training as specified in Section 6.1.

6.5 Recognition of waste types training

- 6.5.1 All employees will be given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the site's EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees will be advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact NRW to agree a suitable method for removal.
- 6.5.2 This training will be provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production. They will be trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

6.6 Storage areas / limits training

- 6.6.1 Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure that waste storage operations comply with the requirements of the EP for the site.
- 6.6.2 Employees in these roles must also be trained to recognize storage limits to ensure that they are in accordance with those specified in Section 1.5.

6.7 Vehicle / plant preventative maintenance training

- 6.7.1 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human
- 6.7.2 The same training will be provided to senior management enabling a dual-level maintenance programme.

6.8 Duty of care training

- 6.8.1 All employees dealing with consignments of waste will be trained in the completion of Duty of Care Waste Transfer Notes and the appropriate auditing of destination sites and/or contractors to ensure compliance.

6.9 Plant operation training

- 6.9.1 Any employees who are required to operate loading or treatment plant for the movement or processing of waste will be required to undertake the necessary qualifications for the operation of the specific item of plant in question. This will be required prior to operating the plant and will be obtained through necessary external certification programmes.
- 6.9.2 Regardless of general plant operation certification, all operatives will be fully inducted in the operation of the specific make and/or model of plant used on site.

6.10 Permit / EMS training

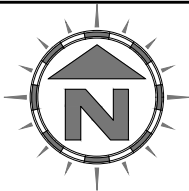
- 6.10.1 All employees will be inducted into the operating conditions as prescribed in the EP for the site. Whilst much of the above training will provide specific guidance on many aspects of these documents, all employees will be made aware of the location of the EP in the site office. All managerial positions will be made fully aware of the site's operating conditions.

6.11 Training for contractors

- 6.11.1 General site training will be provided to any contractors who are working on the site on a temporary basis as described in Sections 6.2, 6.3 and 6.4 above.
- 6.11.2 Additional training will be provided to contractors in their area of expertise. If they are dealing with specific items of plant/machinery, site operating conditions and a general understanding of the EP conditions will be provided to prevent any adverse impacts on the environment.

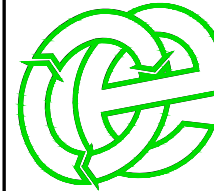
Appendix I

Drawings



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Waste, Planning and Environmental Consultants



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e: sales@oaktree-environmental.co.uk

Drawing No:	3617/2104/01	Rev:	-
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Title:	SITE LOCATION MAP
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Site:	East Bank Road, Newport NP19 4PP
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Client:	KDK Metals Ltd
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Date:	27 September 2017	Job:	3617
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Drawn:	RS	Checked:	RD	Client:	2104
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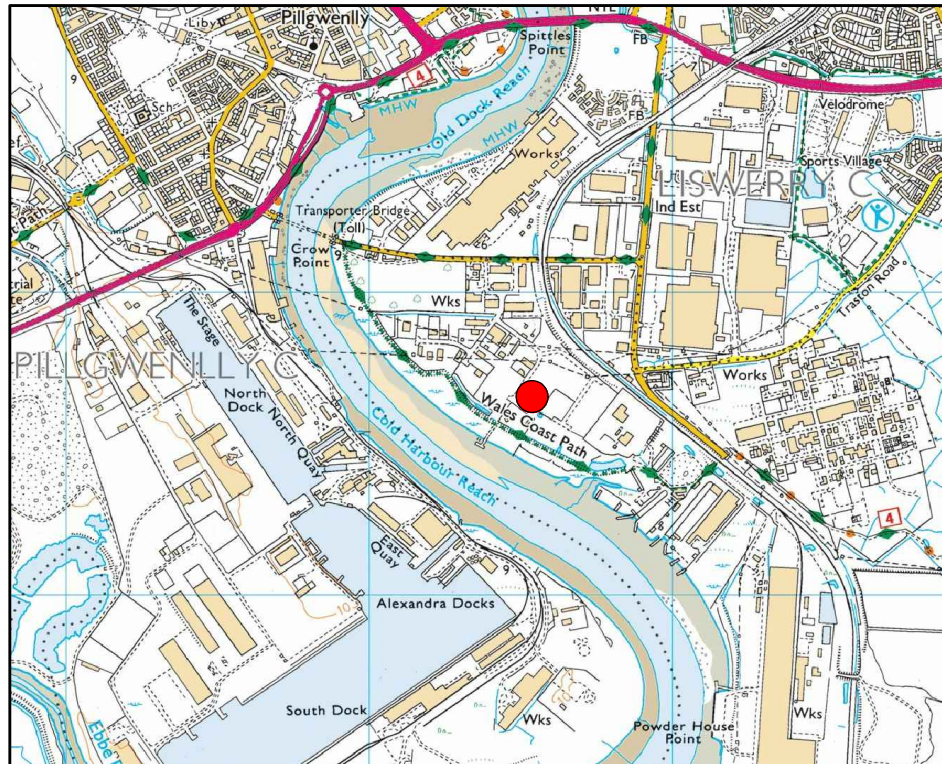
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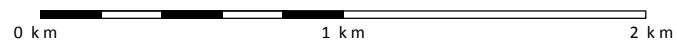
 Site location

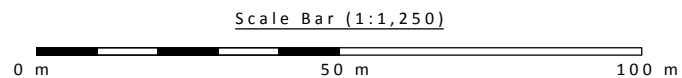
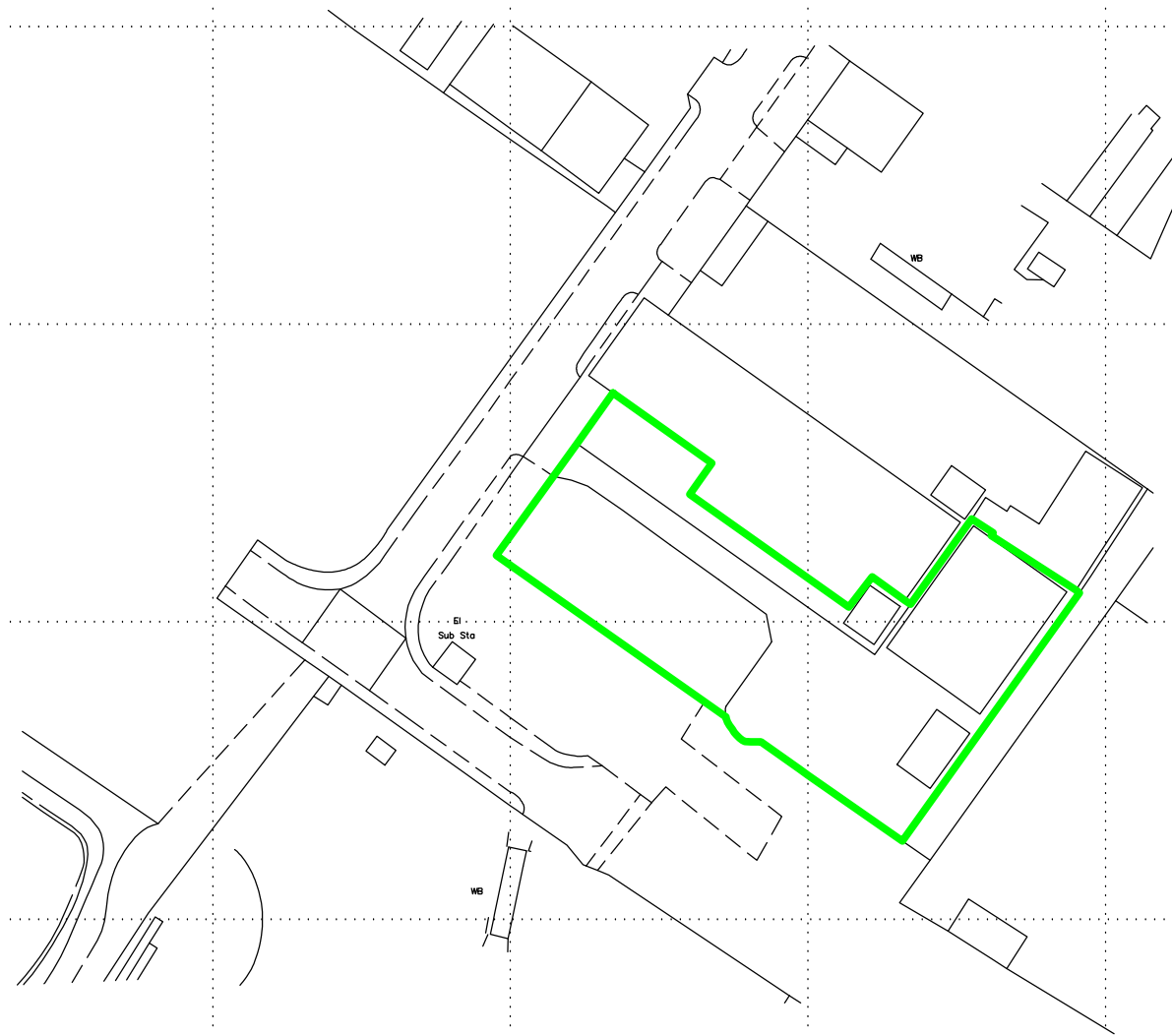
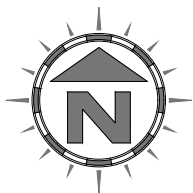
REVISION HISTORY

Rev:	Date:	Init:	Description:
-	27/09/17	RS	Initial drawing



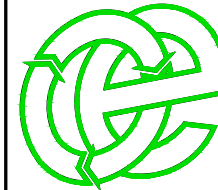
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Drawing No: 3617/2104/02 Rev: -

Title: PERMIT BOUNDARY PLAN

Site: East Bank Road, Newport NP19 4PP

Client: KDK Metals Ltd

Date: 27 September 2017 Job: 3617

Drawn: RS Checked: RD Client: 2104

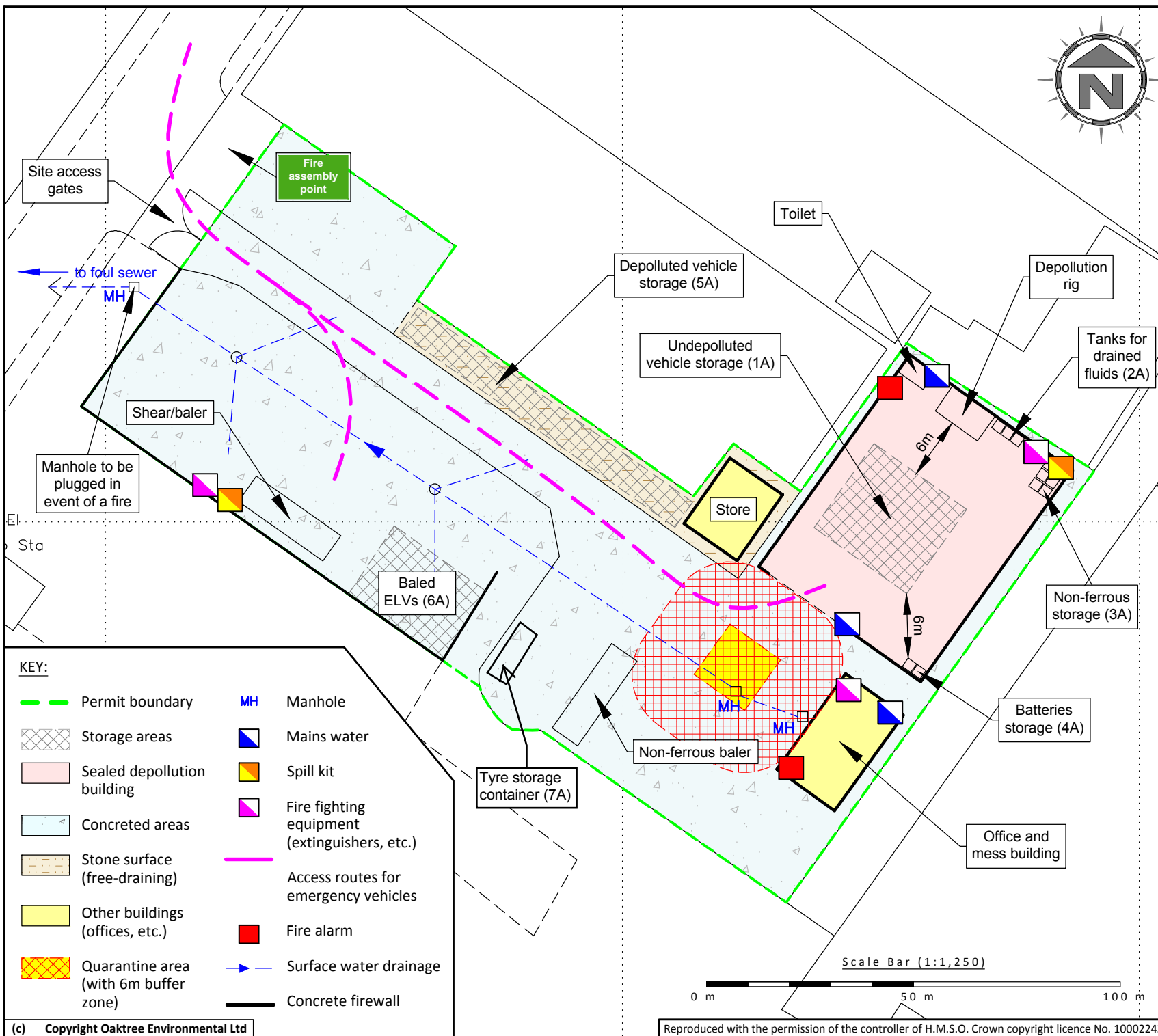
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KEY:
— Permit boundary

Notes:
(1) Drawing for indication only.
(2) Do not scale from this drawing.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	27/09/17	RS	Initial drawing



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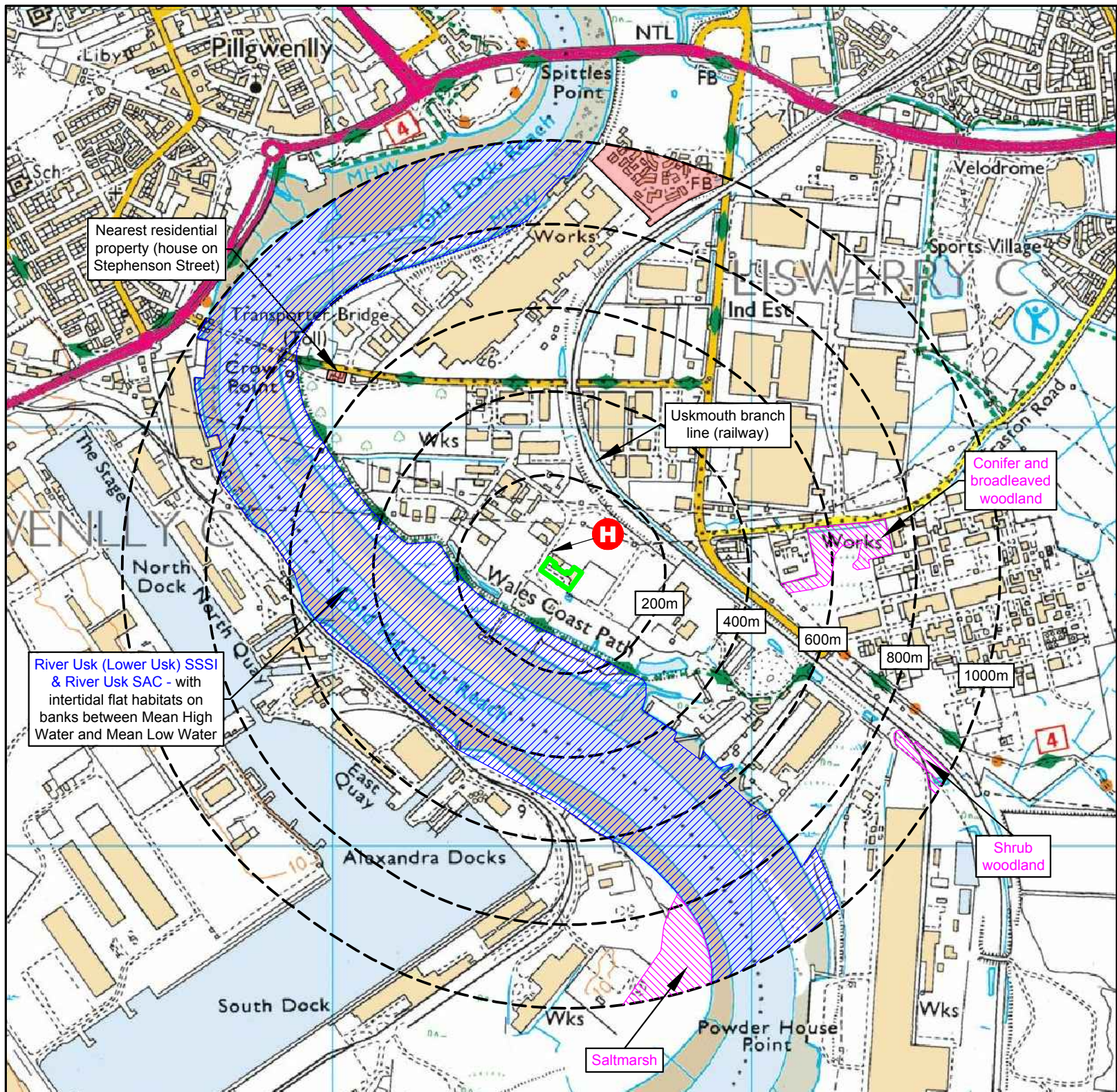
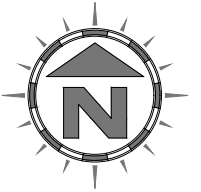
w: www.oaktree-environmental.co.uk
e: sales@oaktree-environmental.co.uk

Drawing No:	3617/2104/03	Rev:	-
Title:	LAYOUT & FIRE PLAN		
Site:	East Bank Road, Newport NP19 4PP		
Client:	KDK Metals Ltd		
Date:	27 September 2017	Job:	3617
Drawn:	RS	Checked:	RD
Scale:	1:1,250	Client:	2104
		Printed @:	A4

- Notes:**
- (1) Drawing for indication only.
 - (2) Do not scale from this drawing.

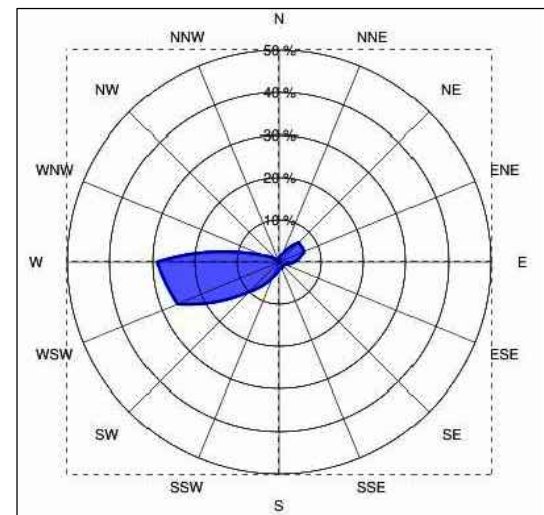
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REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	27/09/17	RS	Initial drawing



KEY:

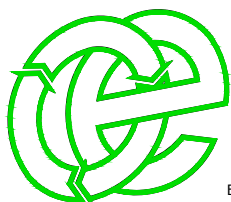
- | | | | |
|--|--|--|-------------------|
| | Permit boundary | | Residential areas |
| | Surface water body (river / stream / pond / pool / lake) | | Class A roads |
| | Residential property / workplace (includes agricultural buildings and outhouses) | | Class B roads |
| | Protected sites (Ramsar, SSSI, SPA, SAC, etc.) | | Class C roads |
| | Protected habitats (woodland, PHI, etc.) | | |
| | Fire hydrants in vicinity of site | | |



Compass Wind Rose for St Athan Royal Air Force Base (EGDX) Period 2000-2010

Scale Bar (1:12,500)

0 m 500 m 1,000 m



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E-mail: sales@oaktree-environmental.co.uk

Client:	KDK Metals Ltd		
Site:	East Bank Road, Newport NP19 4PP		
NGR:	ST 32536 85654		
Date:	27 September 2017	Printed At:	A3
Scale:	1:12,500	Revision:	-
Client No:	2104	Job No:	3617
		Drawn By:	RS
		Checked:	

Notes:

- (1) Boundaries are shown indicatively.
- (2) Wind rose data shows the prevailing wind direction to be W.

Revision Details:

Rev:	Description:	Date:
-	Initial drawing	27/09/17

Title: RECEPTORS PLAN

Drawing No: 3617/2104/04

Appendix II

Record Keeping Forms

KDK METALS LTD**WASTE INPUT RECORD FORM - KDK/RF/1****DATE:**

TIME	PRODUCER/ SOURCE	WASTE TYPE	QUANTITY (TONNES/ m ³)	NAME OF CARRIER	DRIVERS NAME	DRIVERS SIGNATURE	VEHICLE REG. NO.	WASTE ACCEPTED/ INSPECTED BY
TOTAL FOR THIS SHEET								
TOTAL FROM PREVIOUS SHEET				SHEET No. OF . CHECKED.....				
TOTAL WASTE DEPOSITED								

KDK METALS LTD
REJECTED WASTE - RECORD FORM KDK/RF/2

DATE	
TIME	
WASTE DESCRIPTION	
QUANTITY OF WASTE	
PRODUCER/HOLDER'S NAME, ADDRESS & TELEPHONE No.	
NAME OF CARRIER	
VEHICLE REGISTRATION	
CARRIER REG. No.	
REASON FOR REJECTION OF WASTE	
ACTION TAKEN	

KDK METALS LTD

WASTE AND PRODUCT OUTPUT RECORD FORM - KDK/RF/3

MONTH.....

DATE	TIME	WASTE TYPE	QUANTITY (TONNES)	DESTINATION SITE	NAME OF CARRIER OR EMPLOYEE REMOVING WASTE	VEHICLE REG. NO.
TOTAL FOR THIS SHEET						
TOTAL FROM PREVIOUS SHEET				SHEET No. OF . CHECKED.....		
TOTAL WASTE EXPORTED						

KDK METALS LTD								
SITE INSPECTION FORM (DAILY INSPECTIONS) – KDK/RF/4								
WEEK STARTING								
TYPE OF INSPECTION		DAY						
		M	T	W	T	F	S	S
SITE ENTRANCE/NOTICE BOARD								
SECURITY - GATES								
SECURITY - FENCING								
SITE ROADS (CLEAR FROM HAZARDS)								
WASTE STORAGE AND DEPOLLUTION BUILDING - SIDES/ROOF								
IMPERMEABLE CONCRETE AREAS (INTEGRITY)								
DRAINAGE SYSYTEM								
WASTE CONTAINERS & STORAGE AREAS								
WASTE STORAGE LIMITS	MIXED WASTE							
WASTE STORAGE LIMITS	ASBESTOS							
REJECTED WASTE TYPES / STORAGE								
NOISE LEVELS								
FIRES (ANY INCIDENTS REPORTED)								
QUARANTINE SKIP								
NO SMOKING SIGNS IN PLACE								
FIRE FIGHTING EQUIPMENT								
PLANT/EQUIPMENT MAINTENANCE CHECKS								
SPILL KITS								
OFFICE/WELFARE FIRE RISKS CHECKED								
FUEL TANK/BUND								
LITTER								
DUST								
ODOUR								
VERMIN								
RECORDS								
WEATHER I.E. HEAVY RAINFALL, HIGH WINDS								
COMPLAINTS RECEIVED								
OTHER (SEE NOTES BELOW)								
INSPECTION CARRIED OUT BY								
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):								
CHECKED BY			SIGNATURE					
POSITION			DATE					
Sheet			of					

KDK METALS LTD

EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW - KDK/RF/5

EMPLOYEE NAME					DATE					
POSITION					REVIEW DUE					
TRAINING CARRIED OUT BY										
POSITION										
TRAINING REQUIRED	GENERAL OPERATIVES		HGV DRIVER		PLANT OPERATOR		YARD MANAGER		TECHNICALLY COMPETENT MANAGER	
CARRIED OUT?	Y/N	SIGNED BY EMPLOYEE	Y/N	SIGNED BY EMPLOYEE	Y/N	SIGNED BY EMPLOYEE	Y/N	SIGNED BY EMPLOYEE	Y/N	SIGNED BY EMPLOYEE
SITE RULES AND INFRASTRUCTURE										
EMERGENCY PROCEDURES										
FIRE SAFETY/ FIRE FIGHTING										
RECOGNITION OF WASTE TYPES										
STORAGE AREAS/LIMITS										
RECORD KEEPING										
VEHICLE CHECKS (Preventative Maintenance)										
PLANT CHECKS (Preventative Maintenance)										
DUTY OF CARE WASTE TRANSFER NOTES										
PLANT OPERATION - LOADING PLANT										
PLANT OPERATION - TREATMENT PLANT										
MANAGEMENT SYSTEM & PERMIT										
OTHER 1 (PLEASE SPECIFY)										
OTHER 2 (PLEASE SPECIFY)										

KDK METALS LTD
COMPLAINTS REPORT FORM (KDK/RF/6)

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 KDK/RF/6. 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 Natural Resources Wales 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.

Appendix III

Copy of Issued Environmental Permit & EWC codes

**LIST OF WASTES PERMITTED AT EAST BANK ROAD, FELNEX INDUSTRIAL ESTATE,
NEWPORT, GWENT, NP19 4PP - KDK METALS LTD**

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC	
CODE	WASTE TYPE
16	WASTES NOT OTHERWISE SPECIFIED ON THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 04*	end-of-life vehicles
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)

- I. For the purpose of this list of wastes, PCBs will be defined as in Directive 96/59/EC.
- II. Hazardous components from electrical and electronic equipment may include accumulators and batteries mentioned in 16 06 and marked as hazardous; mercury switches, glass from cathode ray tubes and other activated glass, etc.
- III. For the purpose of this entry, transition metals are: scandium, vanadium, manganese, cobalt, copper, yttrium, niobium, hafnium, tungsten, titanium, chromium, iron, nickel, zinc, zirconium, molybdenum and tantalum. These metals or their compounds are dangerous if they are classified as dangerous substances. The classification of dangerous substances shall determine which among those transition metals and which transition metal compounds are hazardous.
- IV. Stabilisation processes change the dangerousness of the constituents in the waste and thus transform hazardous waste into non-hazardous waste. Solidification processes only change the physical state of the waste (e.g. liquid into solid) by using additives without changing the chemical properties of the waste.
- V. A waste is considered as partly stabilised if, after the stabilisation processes, dangerous constituents which have not been changed completely into non-dangerous constituents could be released into the environment in the short, middle or long term.
- VI. Hazardous components from electrical and electronic equipment may include accumulators and batteries mentioned in 16 06 and marked as hazardous; mercury switches, glass from cathode ray tubes and other activated glass etc.

Appendix IV

Health & Safety – Conditions of Site Use

HEALTH AND SAFETY - CONDITIONS OF SITE USE

The following guidelines apply to all site personnel, contractors and visitors using the site (where applicable).

- 1) The site is covered by the Health and Safety at Work Act 1974 and its associated regulations and all users must abide by any relevant provisions. Any person found to be in contravention of the requirements of this Health and Safety Statement will be asked to leave the site.
- 2) All visitors and contractors must sign the visitor's book upon entry to and exit from the site. All vehicle drivers must report to the office and await instruction from the site manager/deputy before proceeding to deposit waste at the site.
- 3) All accidents, diseases, injuries or dangerous occurrences shall be reported to the site manager. All instructions issued by the site manager in respect of health and safety at the site must be followed by all site users.
- 4) A first aid box (including eye-wash bottles) is kept in the site office. If you are injured on site please alert a member of staff/trained first-aider for assistance.
- 5) All persons must wear the appropriate PPE on site including high visibility jackets and hard hat.
- 6) Safety boots must be worn by all persons in the waste sorting/storage areas.
- 7) Protective gloves must be worn for any operations which present a hazard of puncture to or laceration of the skin or for any manual handling work carried out on site.
- 8) Ear defenders, safety helmets (hard hats) and eye protection will be issued when deemed necessary and must be worn by all employees and contractors where required by the site manager or other site representatives.
- 9) Fire extinguishers are kept on site to deal with any fires - fires shall only be dealt with by employees of KDK Metals Ltd unless alternative instructions are given by the site manager. Access to fire exits and firefighting equipment must be kept clear at all times. When the fire alarm sounds please follow instructions and leave the site in an orderly fashion.
- 10) Persons who are suspected to be under the influence of drugs or alcohol will be removed from the site.
- 11) Smoking is not permitted on the site.
- 12) Observe and follow all traffic directions and traffic/safety signs.
- 13) Drivers must comply with all safety instructions given by the site manager or appointed deputy.
- 14) All drivers are responsible for ensuring that their vehicle is safely loaded. Unsafe loads will not be accepted at the site and will not be allowed to leave the site until they have been made safe.
- 15) Drivers waiting to tip at the recycling centre shall follow the instructions of the operator and shall only tip in the designated area, unless advised otherwise. No tipping shall take place over sorted stockpiles.
- 16) Drivers must remain in the cab or stand well clear of the vehicle during loading or tipping. Once the vehicle has been loaded it must be securely sheeted (if necessary) before leaving the site. When sheeting and unsheeting the vehicle ensure that the engine is switched off, the ignition key removed and the parking brake is on. Do not gain access using the mudguards and wheels. Ensure that your ropes, hooks and sheets are in good condition.
- 17) Never travel with the vehicle body raised. Ensure you know the maximum height of the raised body of your vehicle.

Declaration: To be completed by site users

I have read and understand the conditions of use for this site and agree to comply with them at all times. I accept that neither KDK Metals Ltd nor their employees shall be liable for any loss or injury arising from my non-compliance with the above conditions.

Signed.....

Print name.....

Company/Organisation.....

Date.....

Note: these conditions are included in the EMS for information only and may be revised regularly as part of the site health and safety policy.

Appendix V

Depolluting End-of-Life Vehicles (cars and light goods vehicles) Guidance for Authorised Treatment Facilities March 2011

Appendix VI

Management of Exempt Activities

Management of Exempt Activities

- a) The Exempt activities carried out on site and registered with NRW are listed in the tables below the actual quantities of waste stored will be limited by the constraints of the site.

Exempt treatment operations

Waste type (exemption)	EWC codes	Treatment per
Cans and foil (T4)	150104,200140	100 t per 7 days
Scrap metals (T9)	T9 table	1000 t at any one time (this can include the cans over and above the 100t/7day limit)

Exempt storage

Waste type	EWC codes	Storage limit (time limit storage requirement)
Cans and foil (T4)	150104,200140	500 t (12 months)
Cans and foil (S2)	150104,200140	500 t (12 months baled)
Batteries (S2)	160601*,160602*	10t (6 months in a container in the building)
Tyres,chip and crumb (S2)	160103,191204	40t (3 months no pile lager than 10 tonnes)
Waste electrical and electronic equipment WEEE (S2)	Various see S2 table	400 cubic metres (6 months in the building)
Solder metals/skimmings/ashes/residues	100316,100405*, 100504,100511, 100604,100811, 100899	100t (3 months in bags or drums)
Scrap metals (T9)	T9 table	1000 t (at any one time) (2yrs)

- b) The operator is intending to use only those parts of the exemptions which permit the acceptance treatment and storage of scrap metals and related wastes. This applies in particular to the S2 exemption which includes a wide range of materials.
- c) The operator will ensure that all activities are carried out within the conditions placed on the exemptions.
- d) Exempt activities will be clearly delineated from permitted activities on site.
- e) Waste acceptance procedures will follow those in the Management System only wastes specified under the exemptions will be accepted for storage or treatment there will be a strict policy of refusing any wastes falling outside the limitations of the exemptions.
- f) Records as required by the rules in Schedule 3 to the EP regulations 2016 or subsequent amendments will be maintained by the operator and retained for at least 2 yrs for non hazardous waste and 3 yrs for hazardous wastes.