

ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT



NYOBOLT LIMITED

PRODUCTION OF METAL OXIDE

ENVIRONMENTAL MANAGEMENT SYSTEM SUMMARY

MAY 2024



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DATE ISSUED: MAY 2024 JOB NUMBER: BM12404 **REPORT NUMBER:** 800 **VERSION:** V1.0 **STATUS:** Final **NYOBOLT LIMITED** PRODUCTION OF METAL OXIDE **ENVIRONMENTAL MANAGEMENT SYSTEM SUMMARY MAY 2024 PREPARED BY: Jack Piercy** Mineral Surveyor **REVIEWED BY:** Dominiqua Drakeford-**Associate Director** Allen **APPROVED BY:**

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Technical Director

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1 INTRODUCTION

- 1.1.1 Nyobolt Limited have commissioned Wardell Armstrong in the preparation of an environmental permit application, for the processing and manufacturing of a metal oxide to supply to the battery sector as a means of fast charging lithium-ion battery material.
- 1.1.2 As part of the Environmental Permit Application, a summary of the Environmental Management System (EMS) is required to be submitted. This document provides that summary, and Nyobolt Limited will have a full EMS in place which will be in line with the Environment Agency's guidance on Developing a Management System.
- 1.1.3 This report provides an overview of how the EMS will comply with the Environment Agency's guidance by providing a summary on the systems that are or will be in place at the time of permit issue.
- 1.1.4 Processing and manufacturing activities will be carried out within a building, hereafter referred to as the 'Site'.
- 1.1.5 The full site address is Unit 1a and b, Homefield Road, Homefield Industrial Estate, Haverhill, CB9 8QP.



2 COMPLIANCE WITH ENVIRONMENT AGENCY GUIDANCE

2.1 Site Infrastructure

- 2.1.1 Plans will be available showing the layout of the site, including raw material storage, product storage and equipment associated with the processes within the facility. Entrances and exits to be used by the emergency services and monitoring points.
- 2.1.2 These plans will be made available to relevant members of staff, visitors and the emergency services as necessary to assist in their role and reduce the potential for accidents and pollution events.
- 2.1.3 The site location plan will show the proximity of sensitive receptors, including residential receptors.

2.2 Water, Gas and Electricity

2.2.1 Records will be kept detailing the location of all services. This will include plans showing the location of mains water, gas and electricity supplies.

2.3 **Site Operations**

2.3.1 The site operations are described in the Operating Techniques report. The Site will operate in accordance with the measures set out in the Operating Techniques report, adhering to the Environment Agency guidance 'How to Comply with your Environmental Permit Additional guidance for The Inorganic Chemicals Sector (EPR 4.03) and the indicative BAT set out in this guidance note.

2.4 Site and Equipment Maintenance Plan

- 2.4.1 The EMS will include procedures for planned maintenance of equipment in accordance with the manufacturer's instructions. All equipment will be inspected and serviced on a regular basis.
- 2.4.2 Records will be kept of all inspections, servicing, maintenance and repairs or remedial actions taken.

2.5 **Contingency Plans**

- 2.5.1 Should a plant breakdown, which may have an impact on the environment, operation of that plant will cease until repairs are made by an appropriately qualified and competent engineer.
- 2.5.2 All equipment is fitted with safety mechanisms and procedures will be in place for management of non-conformances and non-conforming product.



2.6 Accident Prevention and Management Plan

- 2.6.1 An Accident Management Plan (AMP) will be in place to deal with any incidents or events that could result in a pollution incident or being unable to comply with the permit.
- 2.6.2 The AMP will include a list of up to date emergency contacts, including out of hours contacts.
- 2.6.3 All incidents will be investigated and suitable remedial actions taken as necessary. Should an accident or incident occur, records will be kept so that the occurrence of incidents can be reviewed and the procedures updated where necessary.
- 2.6.4 The AMP will be reviewed annually to ensure that it reflects the risk of accidents and incidents.

2.7 **On-Line Security**

2.7.1 Measures will be taken to manage on-line security. Back-up copies of records will be made to protect data and to ensure as far as possible that systems are working correctly and records are stored securely.

2.8 Resilience to Climate Change

- 2.8.1 The Site is not in a flood risk area and does not rely on water abstraction. The facility is contained within a state-of-the-art net zero carbon warehouse, which is well equipped to contend with extreme fluctuations of temperature.
- 2.8.2 The impact of Climate Change is expected to be minimal, and no specific measures are required at this current time.

2.9 **Complaints Procedure**

- 2.9.1 Should complaints be received, these will be recorded. Details of nature of the complaint and the time of the complaint will be recorded.
- 2.9.2 All complaints will be passed onto the management team, who will investigate the complaint as soon as possible. A record will be made of whether the complaint was substantiated, the likely cause and the mitigation put in place to prevent further issues.
- 2.9.3 The complainant will be informed of the outcome of the investigation and the measures taken, unless they have requested otherwise.



2.9.4 Records relating to complaints will be kept for a minimum of 2 years and will be made available to the Environment Agency upon request.

2.10 Managing Staff Competence and Training

- 2.10.1 All staff will undergo an induction, including health and safety and environmental awareness. They will be made familiar with the environmental permit and procedures relevant to their role.
- 2.10.2 All staff will be competent in their role, for example having had appropriate training.

 Records will be kept regarding the qualifications required for each role.

2.11 Records

2.11.1 All records will be held securely and will be made available to staff or to the Environment Agency as required, either as hard copies or in digital format. Back-up copies will also be maintained and stored electronically.

2.11.2 Records will include:

- The Environmental Permit;
- Environmental Management System;
- Records of site inspections and audits;
- Records of any complaints and subsequent actions;
- Plant servicing and maintenance;
- Abnormal conditions, including plant breakdown and the actions taken;
- Staff training records.

2.12 Review of the Management System

- 2.12.1 Procedures for checking compliance with the Environmental Permit, procedures and management system will be in place. Records will be kept of the checks carried out, who carried out the checks and what action was taken.
- 2.12.2 The management system will be reviewed, and updated where necessary, when the following apply:
 - Changes are made to the site, the equipment used or the operations;
 - If a permit variation application is made;
 - · Following any accident, complaint or breach to the permit;

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 If a new environmental problem or issue is encountered, and any new control measures have been put into place to control it.

2.13 Site Closure

- 2.13.1 Site closure and environmental permit surrender will take place in accordance with written procedures with due consideration for environmental issues.
- 2.13.2 A surrender report will be produced and submitted to the Environment Agency.
- 2.14 Understanding the Operations on Site
- 2.14.1 All staff will receive training which is appropriate to their role.

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