

Richard BRIERLEY  
[richard.brierley@simsmm.com](mailto:richard.brierley@simsmm.com)

**Date: 20 April 2022**

Dear Mr Brierley

**Request for Information: WEEE Permit Review**

**Permit Number: EPR/ ZP3691ET**

**Operator: Sims Group UK Limited**

**Facility/Location: Rabone Lane, Smethwick, Warley, West Midlands, B66 2LF**

We have recently produced technical guidance for the waste electrical and electronic equipment (WEEE) sector, including facilities that store and treat waste temperature exchange equipment (WTEE). It also applies to facilities that treat or transfer materials derived from the processing of WEEE that require further treatment to comply with the WEEE Directive.

The revised technical guidance sets out the standards we expect operators to meet to comply with the requirements of their environmental permit. We anticipate this guidance being formally published during the summer of 2022.

We have provided you with final drafts of the guidance which you should use as the reference documents for the information notice detailed below. Although drafts, any changes before publication will be of a presentational nature only – the technical standards will not change.

We intend to review all WEEE permits from 2022 and include conditions to implement the revised appropriate measures guidance. For the permit review process, we require you to provide information about:

- your activities on site
- your management system
- your waste pre-acceptance, acceptance and tracking appropriate measures
- your waste storage, segregation and handling appropriate measures
- your waste treatment appropriate measures
- your emissions control appropriate measures
- your emissions monitoring and limits appropriate measures
- your process efficiency measures
- hazardous substance release
- your site infrastructure plan
- storage capacity
- types of waste accepted
- existing pre-operational and improvement conditions
- combustion plant or specified generators you use at your facility
- your climate change adaptation measures

Please find enclosed an information notice issued under Regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 that relates to the above permit. The notice specifies the information you need to provide and the date by which it

must be submitted to the Environment Agency. We may take enforcement action against you if you fail to respond to this notice.

If you have any queries regarding this notice, please contact the [wastetreatment@environment-agency.gov.uk](mailto:wastetreatment@environment-agency.gov.uk) mailbox or telephone Alan Owers (WEEE) on 020302 55887 or Pete Chesney (WTEE) on 020302 53363 in the first instance.

Yours faithfully

**Tim Ross**  
**Senior Permitting Officer**

**Environmental Permitting (England and Wales) Regulations 2016  
Regulation 61(1)**

<b>NOTICE REQUIRING INFORMATION</b>
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To: Sims Group UK Limited

Permit Reference: EPR/ ZP3691ET

Regulated Facility: Rabone Lane, Smethwick, Warley, West Midlands, B66 2LF

The Environment Agency requires you to provide the information specified in Schedule 1 of this notice by **29 August 2022**.

1. The information must be sent by email to:

[wastetreatment@environment-agency.gov.uk](mailto:wastetreatment@environment-agency.gov.uk)

**Date: 20/04/22**

**Signed: Tim Ross**

**Senior Permitting Officer**

**Please see over for notes.**

## **Environmental Permitting (England and Wales) Regulations 2016 Regulation 61(1)**

### **Notes:**

1. For the purposes of discharging its functions under the Environmental Permitting (England and Wales) Regulations 2016, the Environment Agency may (by virtue of Regulation 61(1) of those Regulations), require any person to provide information.
2. Failure to comply with this notice without reasonable excuse is an offence under Regulation 38(4)(a) of the Environmental Permitting (England and Wales) Regulations 2016, and may lead to legal action being taken against you.
3. Making any statement in response to this notice that you know to be false or misleading in a material particular, or recklessly making any statement which is false or misleading in a material particular is an offence under Regulation 38(4)(b) of the Environmental Permitting (England and Wales) Regulations 2016, and may lead to legal action being taken against you.
4. There is no right to appeal against this notice.
5. You may wish to seek independent legal advice.

**Environmental Permitting (England and Wales) Regulations 2016  
Regulation 61(1)**

**SCHEDULE 1**

**Description of information required**

The Environment Agency is required to undertake a periodic review of your permit. This review has been initiated as a result of us producing our guidance Waste electrical and electronic equipment (WEEE): appropriate measures at permitted facilities and Waste temperature exchange equipment (WTEE): appropriate measures for permitted facilities. This Notice sets out the information we require from you in order to be able to carry out a review of your permit. Subject to your response to this Notice we will vary your permit to ensure that it delivers compliance with the updated requirements.

If you have previously provided this information for other activities carried out at this site, for example for metal shredders or chemical waste, you only need to respond to this notice as it relates to your WEEE activities.

If you no longer wish to accept WEEE, you must inform us of this within the timeframe specified in this notice and confirm the date when you will cease to accept it.

**Non-technical Summary: Please provide a brief non-technical description of your regulated facility**

*As per response to Metal Shredder Appropriate Measures Reg 61*

- *The listed activities and waste operations at the site, and whether the permit is consolidated or if there is more than one permit for the site*

*The site has installation activities and waste activities consolidated into one permit. These are listed below:*

*Section 5.4 A (1) b (iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving the treatment in shredders of metal waste, including waste electrical and electronic equipment and end - of - life vehicles and their components.*

*The site has applied for a permit variation to add the following installation activities:*

*5.3 A(1) a (ii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—  
(ii) physico-chemical treatment;*

*Section 5.6 A (1) (a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section, except-*

*(i) temporary storage, pending collection, on the site where the waste is generated, or*

*(ii) activities falling within Section 5.2*

*The site also has Waste Operations – MRS, WEEE ATF.*

- *A brief non-technical description of the facility, including the key stages in the “process” and the relevant disposal and recovery operations*

*Metal shredding - Brief description 5.4 activity: Treatment consisting only of the shredding and granulation of waste containing ferrous and non-ferrous metals for recovery. Continuous treatment of non-hazardous wastes containing metal. Non-hazardous waste will be treated separately from hazardous waste (in batches). Metal shredder and downstream recovery plant. There is a pre-shredder.*

*The site is an Approved Authorised Treatment Facility (AATF) for treatment of WEEE. WEEE wastes will be managed in accordance with the WEEE Directive and relevant legislative requirements. LDA are treated in the metal shredder.*

*The site has applied for a permit variation to shred pre-treated SMW, this would be treated separately from non- hazardous feedstock . *Pre-treated WEEE shredding –**

*Brief description 5.3 activity: Treatment consisting only of the shredding and granulation of waste containing ferrous and non-ferrous metals for recovery. Continuous treatment of hazardous wastes containing metal. Hazardous waste will be treated separately from non-hazardous waste (in batches)*

The site is permitted to but does not currently have a SMW pre-treatment line (manual removal of specified items) to pre-treat SMW prior to treatment in the shredder. The site is a Metal Recycling site. Storage and treatment of ferrous and non-ferrous grades not associated with metal shredding.

- *An indication of the scale of the operation, for example treatment and storage capacity*

The shredder has treatment capacity of 220 tonnes per hr (5280 tonnes based on 24hr operation) capacity for treating non-hazardous (5.4 A (1) b) (iv)) and hazardous wastes for recovery (5.3 A (1) a) (ii)). Re non-hazardous waste for recovery typical capacity 2,640 tonnes, based on 12 hour operation.

Re Hazardous waste for recovery the actual daily treatment capacity for 5.3 A (1) a) (ii) is likely to be in region of approx. 200 tonnes based on current waste arising. Additionally the site permit restricts annual throughput to 374,999 for installation activities and 74,999 for non installation waste activities.

- *A brief description of the principal releases to air, land and water including noise and odour, along with a description of any abatement techniques*

The site has two point source emissions to water (to sewer) two point source emissions to air (one not operational) as summarised below:

A2) Point source emission to Air from Air Cleaning System (See 'Fragmentiser Process Diagram'). Air from cleaning system of shredding of metal containing waste.

A1) Point source emission to Air located at large magnet room, is not operational.

S2) point source emission to water - to the foul sewer on Foundry Lane, which is collected and treated by Severn Trent Water Company. Rainfall dependant site run off potentially containing oil, metals, solids.

S1) discharge to foul sewer of sewage - domestic type discharge, shown on site plan and in permit for completeness.

- *A description of the site location and any key sensitive receptors*

The site has a frontage to Rabone Lane, the rear boundary of the site, as viewed from Rabone Lane, adjoins the former Soho Foundry, the right hand boundary of the site adjoins the canal. The surrounding area is predominantly of industrial use.

Key sensitive receptors are detailed in the Fire Prevention Plan.

- *Any specific significant legislation that applies and why, for example MCPD*

MCPD does not apply.

- *A description of any management systems, for example ISO 14001*

The site operates an internal Environment Management System that is certified to ISO14001. Please see EMS summary

1. Activities			
Activities	WEEE Categories	Check box if the activity applies at your site	Provide a description of each activity  <i>For storage activities, confirm the total quantity (tonnes) of waste that can be stored on site at any one time (including hazardous and non-hazardous wastes, and waste stored in buildings and external yard areas) and the details of any restrictions that apply to the storage of wastes (e.g. maximum storage times).  For treatment activities, include, where relevant, details of the number of treatment plant/lines, mode of operation (batch or continuous), maximum daily treatment capacity (tonnes per day), whether treating hazardous and/or non-waste (include EWC codes), whether treating for recovery and/or disposal, and abatement equipment used including manufacturer/model where available. Where heat is provided to the treatment process please explain how this is generated and supplied.</i>
Storage of WEEE	Gas discharge lamps	<input type="checkbox"/>	
	Cathode ray tube equipment	<input checked="" type="checkbox"/>	Waste storage on concrete prior to removal to a suitably authorised facility. Total quantity stored on site at any one time 5 tonnes and restrictions that apply to the storage of wastes (e.g. maximum storage times 6 months)
	Flat panel display equipment	<input checked="" type="checkbox"/>	Waste storage on concrete prior to removal to a suitably authorised facility. Total quantity stored on site at any one time 5 tonnes and restrictions that apply to the storage of wastes (e.g. maximum storage times 6 months)
	Small mixed WEEE	<input checked="" type="checkbox"/>	Waste storage prior to pre-treatment, on concrete. Total quantity stored on site at any one time 50 tonnes untreated SMW prior to dispatch to Nottingham for treatment, 200 tonnes pre-treated SMW prior to treatment in shredder. 200 tonnes untreated SMW prior to pre-treatment on site.
	Large domestic appliances	<input checked="" type="checkbox"/>	Waste storage prior to shredding is on concrete. LDA stored and treated along with other shredder infeed such as Light Iron and depolluted ELV. Shredder infeed consisting of Light Iron, depolluted ELV, LDA etc. Total quantity stored on site at any one time and restrictions that apply to the storage of wastes (e.g. maximum storage times)



			<table border="1"> <thead> <tr> <th>Waste type</th> <th>Max quantity on site</th> <th>Max quantity in any one stockpile</th> <th>Stockpile dimension/ conditions*</th> <th>Duration</th> </tr> </thead> <tbody> <tr> <td>LI will contain a proportion of wastes considered combustible e.g. depolluted / baled ELV</td> <td>1000 tonnes</td> <td>500t circa 1000m<sup>3</sup></td> <td>30m*30m*6m</td> <td>Typically weekly, no greater than 3 months</td> </tr> </tbody> </table>	Waste type	Max quantity on site	Max quantity in any one stockpile	Stockpile dimension/ conditions*	Duration	LI will contain a proportion of wastes considered combustible e.g. depolluted / baled ELV	1000 tonnes	500t circa 1000m <sup>3</sup>	30m*30m*6m	Typically weekly, no greater than 3 months
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IT, telecommunications and business equipment	<input checked="" type="checkbox"/>	IT, telecommunications and business equipment are stored with SMW, please see SMW											
Photovoltaic panels	<input type="checkbox"/>												
Waste temperature exchange equipment (WTEE)	<input checked="" type="checkbox"/>	Storage of WTEE on concrete, pending consignment to suitably authorised treatment facility. Total quantity of waste stored on site at any one time 5 tonnes and maximum storage times <3 months											
Shredded WEEE/plastic	<input checked="" type="checkbox"/>	<p>Note shredded WEEE is not separately stored. LDA are shredded alongside other shredder infeed consisting of Light Iron, depolluted ELV, LDA etc. The site will store residues from shredding infeed which will include shredded WEEE.</p> <p>Storage of SMW Residues from shredding of Pre-treated SMW on concrete. The total quantity of hazardous post shredding residues stored on site at any one time is 200 tonnes. The storage of hazardous post shredding residues is not specified in the FPP as the hazardous residues have similar combustion risk as non-hazardous residues and are therefore not differentiated. Total quantity of waste post shredding stored on site at any one time and restrictions that apply to the storage of wastes.</p>											
Other – please specify	<input checked="" type="checkbox"/>	Other WEEE categories stored include: Consumer equipment, Lighting equipment, Electrical and electronic tools (with the exception of large-scale stationary industrial tools), Toys, leisure and sports equipment, Monitoring and control instruments, These are all stored with SMW. Also, potentially Medical devices (with the exception of all implanted and infected products) Automatic dispensers.											

			<p>Pre-treated SMW - Storage of pre-treated SMW on concrete prior to shredding. Total quantity stored on site at any one time and restrictions that apply to the storage of wastes (e.g. maximum storage times) from FPP section 9.2 extract below</p> <table border="1"> <thead> <tr> <th>Waste type</th> <th>Max quantity on site</th> <th>Max quantity in any one stockpile</th> <th>Stockpile dimension/ conditions*</th> <th>Duration</th> </tr> </thead> <tbody> <tr> <td>Pre-treated SMW (that has been manually pretreated)</td> <td>200 tonnes</td> <td>110 tonnes / 450m<sup>3</sup></td> <td>15m*15m*4m</td> <td>Processed daily. Typically not exceeding 1 week. Will not exceed 3 months</td> </tr> </tbody> </table>	Waste type	Max quantity on site	Max quantity in any one stockpile	Stockpile dimension/ conditions*	Duration	Pre-treated SMW (that has been manually pretreated)	200 tonnes	110 tonnes / 450m <sup>3</sup>	15m*15m*4m	Processed daily. Typically not exceeding 1 week. Will not exceed 3 months
Waste type	Max quantity on site	Max quantity in any one stockpile	Stockpile dimension/ conditions*	Duration									
Pre-treated SMW (that has been manually pretreated)	200 tonnes	110 tonnes / 450m <sup>3</sup>	15m*15m*4m	Processed daily. Typically not exceeding 1 week. Will not exceed 3 months									
Preparation for re-use	Cathode ray tube equipment	<input type="checkbox"/>											
	Flat panel display equipment	<input type="checkbox"/>											
	Small mixed WEEE	<input type="checkbox"/>											
	Large domestic appliances	<input type="checkbox"/>											
	IT, telecommunications and business equipment	<input type="checkbox"/>											
	Photovoltaic panels	<input type="checkbox"/>											
	Waste temperature exchange equipment (WTEE)	<input type="checkbox"/>											
	Other – please specify	<input type="checkbox"/>											
Manual dismantling (including manual removal of annex VII items prior to mechanical treatment)	Cathode ray tube equipment	<input type="checkbox"/>											
	Flat panel display equipment	<input type="checkbox"/>											
	Small mixed WEEE	<input checked="" type="checkbox"/>	<p>Pending installation of SMW 1 treatment plant line, mode of operation continuous, maximum daily treatment capacity 280 tonnes per day. Treatment of hazardous SMW for recovery. Waste activity. Powered by electricity.</p> <p>Total quantity stored on site at any one time and restrictions that apply to the storage of wastes (e.g. maximum storage times) from FPP section 9.2 extract below</p> <table border="1"> <thead> <tr> <th>Waste type</th> <th>Max quantity on site</th> <th>Max quantity in any one stockpile</th> <th>Stockpile dimension/ conditions*</th> <th>Duration</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Waste type	Max quantity on site	Max quantity in any one stockpile	Stockpile dimension/ conditions*	Duration					
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			SMW/ SDA untreated	200 tonnes	110 tonnes / 450m³	15m*15m*4m	Processed daily. Typically not exceeding 1 week. Will not exceed 3 months
	Large domestic appliances	<input type="checkbox"/>					
	IT, telecommunications and business equipment	<input type="checkbox"/>					
	Photovoltaic panels	<input type="checkbox"/>					
	Other – please specify	<input checked="" type="checkbox"/>	<p>Other WEEE categories listed below are stored and treated alongside SMW: Consumer equipment, Lighting equipment, Electrical and electronic tools (with the exception of large-scale stationary industrial tools), Toys, leisure and sports equipment, Monitoring and control instruments These are all treated with SMW, please see SMW. Also, potentially Medical devices (with the exception of all implanted and infected products) Automatic dispensers</p>				
Mechanical dismantling and separation	Flat panel display equipment	<input type="checkbox"/>					
Crushing for volume reduction only (no separation)	Gas discharge lamps	<input type="checkbox"/>					
Shredding/fragmentising and separation	Gas discharge lamps	<input type="checkbox"/>					
	Cathode ray tube equipment	<input type="checkbox"/>					
	Flat panel display equipment	<input type="checkbox"/>					
	Small mixed WEEE	<input checked="" type="checkbox"/>	<p>Only pre-treated SMW The site shreds pre-treated SMW batched separately from non- hazardous feedstock (The process itself is not batch fed, but continuous). The site does not batch shred Small Mixed WEEE (SMW) (only pre-treated SMW).</p> <p>Pre-treated SMW will be treated as discrete batches of material. The equipment used / process route will be the same as for other waste streams, so a continuous treatment process. After shredding, the metal will be recovered by magnets and</p>				

		<p>remaining waste streams will be sent to Sims Long Marston for further treatment and refining.</p> <p>1 dry process (with water injection) hammer mill fragmentiser, LYNXS 6000HP electric operated, continuous operation, 220 tonnes per hr (5280 tonnes based on 24hr operation) capacity for treating non-hazardous (5.4 A (1) b (iv)) and hazardous wastes for recovery (5.3 A (1) a (ii)).</p> <p>Re non-hazardous waste for recovery typical capacity 2,640 tonnes, based on 12 hour operation</p> <p>Re Hazardous waste for recovery the actual daily treatment capacity for 5.3 A (1) a (ii) is currently in region of approx. 200 tonnes based on current waste arising. This is based on current waste arising and not capacity. In theory, the capacity for treatment is the same as the shredder 'daily treatment capacity', so 5280 tonnes per day. However, treatment of hazardous waste capacity likely to be in region capacity 600 tonnes per day.</p> <p>Additionally, the site permit restricts annual throughput to 374,999 for installation activities and 74,999 for non installation waste activities.</p>
Large domestic appliances	<input checked="" type="checkbox"/>	<p>1 dry process (with water injection) hammer mill fragmentiser, LYNXS 6000HP electric operated, continuous operation, 220 tonnes per hr (5280 tonnes based on 24hr operation) capacity for treating non-hazardous (5.4 A (1) b (iv)) and hazardous wastes for recovery (5.3 A (1) a (ii)).</p> <p>Re non-hazardous waste for recovery typical capacity 2,640 tonnes, based on 12 hour operation</p>
IT, telecommunications and business equipment	<input checked="" type="checkbox"/>	Following pre-treatment alongside SMW, please see SMW
Photovoltaic panels	<input type="checkbox"/>	
Other – specify	<input checked="" type="checkbox"/>	Following pre-treatment alongside SMW, other WEEE categories treated include:

			Consumer equipment, Lighting equipment, Electrical and electronic tools (with the exception of large-scale stationary industrial tools), Toys, leisure and sports equipment, Monitoring and control instruments,. Also, potentially Medical devices (with the exception of all implanted and infected products) Automatic dispensers
Stage 1 degassing	Waste temperature exchange equipment (WTEE)	<input type="checkbox"/>	
Stage 2 destruction	Waste temperature exchange equipment (WTEE)	<input type="checkbox"/>	
Granulation	WEEE derived cable	<input type="checkbox"/>	
Density separation	WEEE derived plastic	<input type="checkbox"/>	
X ray separation	WEEE derived plastic	<input type="checkbox"/>	
Other treatment of WEEE or WEEE derived materials	Please specify	<input checked="" type="checkbox"/>	There are downstream treatments post shredding e.g. magnetic separation, Eddy current separator, manual sorting. Please see Regulation 61 Metal Shredder response for details.
Any other waste operations or processes carried out at your facility that are not covered by the sections above	Please specify	<input checked="" type="checkbox"/>	The site is a metal shredder, metal recycling site, please see Metal Shredder Reg 61 response for details.

2. General management appropriate measures	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the general management appropriate measures given in the WEEE guidance, including (where relevant) the additional appropriate measures for WTEE? If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, staff competence point X) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification for the alternative measures here (or in a separate document).</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p>		<p>As per response to Metal Shredder Appropriate Measures Reg 61, Note some of the guidance subsection numbering is different:</p> <p>We are not currently in compliance with appropriate measures subsection 2.1.1 “You consider the risks a changing climate poses to your operations. You have appropriate plans in place to assess and manage future risks.”</p> <p>Sims has started the process of considering the risks a changing climate poses to our operations and in future will have appropriate plans in place to assess and manage future risks. In 2021, as a business, Sims progressed our approach to assessing climate risks and opportunities by performing climate scenario analysis to assess potential financial-related impacts of key risks and opportunities. Climate risk is managed through our Enterprise Risk Management (ERM) framework, which is designed to support each business unit in the effective management of risk. It enables a consistent approach to risk identification, management and monitoring through the use of a global risk taxonomy. The work conducted at group level will inform the UK plans.</p> <p>Recently the EA brought to the attention of industry via FAQ’s “It is anticipated that all waste permits will have EMS to ensure that sites have adequate climate change adaption plans. We are currently producing new guidance on Climate Change. Where a plan is required but not yet in place we would include an improvement condition to address this.” This new guidance will be considered when issued.</p> <p>We are not currently fully compliant with appropriate measures subsection 2.1.1 “You have and maintain the following documentation: inventory of emissions to air and water.</p> <p>Site does have an Inventory of emissions to air and water, but inventory does not cover all the detail in section six and seven. Please see those sections for more detail.</p>

We are not currently compliant with appropriate measures subsection 2.1.1 site condition report”

Site does not have an IED baseline site condition report as this was not required when sites transitioned to IED. Site condition report will be generated and provided to EA by 31.12.2022

We are not currently compliant with appropriate measures subsection 2.4.4 You must be able to contain surges and storm water flows. You must provide enough buffer storage capacity to make sure you can achieve this.

The site has buffer storage capacity to contain water generated during ‘other than normal’ operating conditions such as in event of fire. This is detailed in Fire prevention plan. BAT requires appropriate buffer storage capacity is provided for waste water generated during other than normal operating conditions using a risk-based approach and BAT also states for applicability that “For existing plants, applicability may be limited by space availability and by the layout of the water collection system. Recently EA FAQ stated the following:

**6. Section 2.4 of the appropriate measures guidance requires operators to provide enough buffer storage capacity to contain surges and storm water flows, but how much is enough?**

**EA Response:** It’s not possible to give an exact figure and this will need to be assessed on an individual site basis which will depend on location and meteorological data on local storm events. The capacity required can be risk-based taking into account the nature of the pollutants, effects of downstream wate water treatment and the sensitivity of the receiving environment. It is also important to take climate change mitigation and adaptation measures into consideration. For example, we expect annual winter rainfall to rise by 40% and rainfall intensity to increase by 20% on present levels. More information can be found here: [Metals recycling: examples for your adapting to climate change risk assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614222/metals_recycling_examples_for_your_adapting_to_climate_change_risk_assessment.pdf)

Time will be needed to take this new information into consideration.

		<p>Sims EMS documents reference compliance with General Management</p> <p>Appropriate measures include:</p> <p>EMS Summary, EHS Policy, Operating techniques incl. all app and process flows written descriptions of processes.</p> <p>Waste Acceptance Procedure / bale inspection procedure, ECP, FPP, Site Plan, Point source emissions management plans i.e. point source to air, water and ambient emissions plans.</p>
Does your management system include:	<b>Answer</b> Yes/No/NA	(If yes, provide plan document reference and confirm if it has been approved/agreed by the EA):
<ul style="list-style-type: none"> <li>• an odour management plan?</li> <li>• a noise and vibration management plan?</li> <li>• a dust management plan?</li> <li>• a pest management plan?</li> <li>• a fire prevention plan?</li> </ul>	<p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>Yes</p>	<p>N/A odour management covered in OT section 3.2</p> <p>This is covered in Operating techniques section 3.3</p> <p>This is covered in Operating techniques section 3.4</p> <p>This is covered in Operating techniques section 3.6</p> <p>Yes ref Apr 22 submitted, previous version approved</p>



<b>3. Waste pre-acceptance, acceptance and waste tracking appropriate measures</b>	<b>Answer Yes/No/NA</b>	<b>Date compliance expected / Response / Reference to attached document</b>
<p>Do you currently comply with all the waste pre-acceptance, acceptance and tracking appropriate measures given in the WEEE guidance, including (where relevant) the additional appropriate measures for WTEE?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, waste acceptance points X and X) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p>	<p>No</p>	<p>As per response to Metal Shredder Appropriate Measures Reg 61:</p> <p>We are not currently in compliance with appropriate measures subsection 3.3.3. You must create records and update them to show deliveries, on-site treatment and despatches. Your tracking system will also operate as a waste inventory and stock control system. It must include this information as a minimum:</p> <p>...</p> <p>where the waste is physically located on site</p> <p>However, we do not consider it is necessary to have this information in the waste tracking system and consider it is adequately managed via other means.</p> <p>Where the waste is physically located on site is not detailed in the computerised waste tracking systems, but is available via other means such as locations shown on site layout plans, fire prevention plans, mud maps etc.</p> <p>Sims EMS documents reference compliance with Waste pre-acceptance, acceptance and waste tracking appropriate measures include: Operating techniques, Waste Acceptance Procedure, Baled waste procedure, Fire Prevention Plans.</p>

4. Waste storage, segregation and handling appropriate measures	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the waste storage segregation and handling appropriate measures given in the WEEE guidance, including (where relevant) the additional appropriate measures for WTEE?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, waste storage, segregation and handling points X and X) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p>	<p>No</p>	<p>Note re 4.1.7. You must not accumulate waste unnecessarily. You must treat wastes, or remove them from the site, as soon as possible. Generally, all wastes must be removed within a maximum of 6 months of receipt. If you have a shorter time period as a permit condition or one is specified in your fire prevention plan you must comply with that condition or the fire prevention plan.</p> <p>We believe this section should not be <u>generally applicable</u> as accumulation of waste is sometimes necessary at scrap metal sites and as long as the risks are controlled, the duration should not be restricted as detailed in AM guidance. Scrap metal is a waste. It may be necessary from time to time to accumulate processed scrap metal on site for durations longer than that specified in AM guidance, due to market conditions for example. The permit currently allows storage of wastes for up to 3 years prior to recovery.</p> <p>Combustible wastes will be stored for timescales as specified in FPP &lt;3 months.</p> <p>There is no increased risk from storing processed scrap for durations longer than 6 months. BAT does not specify 6 month maximum storage duration. We therefore request a derogation versus this appropriate measure</p> <p>We are not currently compliant with 4.1.16. You must also use weatherproof covering in areas used for storage of waste containing hazardous material or fluids where this is necessary to avoid contamination of surface water. This includes, but is not necessarily limited to, the storage of:</p> <p>.....</p> <p>Shredded WEEE or plastic containing fractions that may be persistent organic pollutant (POPs) waste</p>

		<p>and 4.1.17. Covering may still be required even if you have a consent to discharge surfacewater to sewer or if water is tankered away. For example, to avoid leached chemicals such as POPs from WEEE plastic entering the water environment.</p> <p>A permit variation application has been made to shred pre-treated SMW. Shredded WEEE fractions that may be persistent organic pollutant (POPs) waste are not currently all undercover. BAT did not specifically require this. We can put an improvement programme into place, it will take time to comply. We will work towards covering all relevant bays with a proposed timescale for completion 30.06.23.</p> <p>Sims EMS documents reference compliance with Waste storage, segregation and handling appropriate measures  Operating techniques  Fire Prevention Plan</p>
<p>If you repackage waste at your facility confirm what types of waste you repackage, and describe the repackaging activity and say how and where on site you carry it out.</p>	<p>N/A</p>	

5. Waste treatment appropriate measures	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>If you carry out waste treatment activities do you currently comply with all the waste treatment appropriate measures given in the WEEE guidance, and (where relevant) the additional appropriate measures for WTEE including section 6 Process Monitoring?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, General Waste Treatment points X and X) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which they are including subsection heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p>	<p>No</p>	<p>We are not currently compliant with 5.2.14. You must minimise the release of diffuse emissions to air from activities which may give rise to them (for example, shredding or granulating) by:</p> <ul style="list-style-type: none"> <li>• carrying out the activity using enclosed equipment or in an enclosed building</li> <li>• maintaining the enclosed equipment or buildings under an appropriate pressure</li> </ul> <p>We consider this guidance goes above and beyond BAT requirements and that these measures are not practicable for metal shredders to achieve. BAT 14 states ‘this includes techniques such as:....’ Appropriate Measures guidance doesn’t give examples, it says ‘must’. Also note BAT has an applicability section, which Appropriate Measures Guidance does not consider. In particular, in respect of “ You must do this by: * carrying out the activity using enclosed equipment or in a closed building”</p> <p>Not all shredding activity is carried out using enclosed equipment or in a closed building. The metal shredder is not currently enclosed.</p> <p>There are other abatement techniques to minimise emissions such as water injection to the mill, cyclones and the risk of emissions to air from the shredder given these other abatement techniques, does not justify the cost of fully enclosing. Infeed conveyors will not be enclosed due to safety, needing to be able to see the material and also because they are not a significant source of emissions. Emissions will be controlled via methods specified in Dust Management plans such as using abatement technologies e.g. cyclones, conveyors which transport lighter fractions are covered, drop</p>

		<p>heights minimised where practicable, fitted with curtains / chutes etc. misting or damping systems, enclosures, netting, housekeeping etc.</p> <p>As a result, we are also not in compliance with “You must do this by:* maintaining the enclosed equipment or building under an appropriate pressure”</p> <p>This is not relevant as enclosed equipment such as conveyors are not fully enclosed and so cannot be kept under an appropriate pressure. This is not necessary to minimise emissions of dust from metal shredding. This can be done by other methods as previously detailed.</p> <p>We therefore request a derogation versus the above appropriate measures on grounds will be adequately managed by other controls.</p>
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6. Emissions control appropriate measures	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the emissions control appropriate measures given in the WEEE guidance?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, emissions of noise and vibration point X) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which they are including subsection heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance</p>	<p>No</p>	<p>We are not currently fully compliant with 6.1. You must contain the waste treatment process to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release.</p> <p>As previously detailed versus section 5, we do not consider it operationally practicable nor necessary to 'contain' waste treatment plant in order to minimise emissions. The abatement systems on metal shredders e.g. cyclones collect the emissions and the water injection into the mill, in combination with other controls such as covering of conveyors where appropriate, controls the potential for emissions. This meets BAT, which requires techniques such as: collecting and directing the emissions to an appropriate abatement system (see Section 6.1) via an air extraction system and/or air suction systems close to the emission sources.</p> <p>It is not reasonably practicable to fully enclose and contain pre- and post treatment shredder plant. Nor is this necessary to prevent emissions. Emissions can be prevented or where not practicable minimised using one of combination of techniques specified in BAT. Examples:</p> <p>The pre-shredder will not be fully enclosed. Pre-shredders are low energy, not a significant source of emissions, they can be fitted with misting systems where required and mobile dust suppression can also be used. Pre-shredders are large items of plant due to process and volume of waste treated. They are top fed by MSH and this would give rise to requirement for a significant sized building to give height / footprint, should they have to be enclosed. The MSH would have to operate in this building to load pre-shredder so would need to be large enough/ well illuminated etc. Safety concern and cost outweighs environment risk. BAT acknowledges this via applicability re the use of buildings may be restricted by safety considerations / volume of the waste, Fire risk.</p>

		<p>Infeed conveyor - weight / size of scrap at infeed stage is low risk of emissions, conveyor uncovered for safety reasons, to be visible for inspections / prevent blockages, has side protection to prevent windblown debris.</p> <p>Shredder itself - The abatement systems on metal shredders e.g. cyclones collect the emissions and the water injection into the mill, in combination with other controls such as covering of conveyors where appropriate, controls the potential for emissions. This meets BAT.</p> <p>Downstream metallic fractions - low risk of emissions, other measures such as minimise drop heights are in use.</p> <p>We therefore request a derogation versus having to fully enclose and contain pre- and post-treatment shredder plant to prevent emissions</p> <p>We are not currently in full compliance with appropriate measures subsection 6.1.2. "You must identify the main chemical constituents of the site's point source emissions as part of the site's inventory of emissions to air. You must include the speciation of volatile organic compounds (VOCs) if you have identified them in the emissions inventory and it is practicable to do so."</p> <p>BAT does not require speciation of VOC's. However, total VOC will be tested 6 monthly as per requirements of AM Guidance. Note: AM requires testing for other parameters such as BFR's etc. This work is in the process of being commissioned and will be completed by 31.10.22. The results will be reviewed an inventory updated by 31.12.22.</p> <p>We are not currently in full compliance with appropriate measures subsection 6.4.1. You must identify the main chemical constituents of the</p>
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		<p>site's point source emissions to water and sewer as part of the site's inventory of emissions.</p> <p>The site has been monitoring for several years versus protocols agreed with the EA. However, appropriate measures require monitoring for As &amp; TOC which are not currently monitored.</p> <p>Regulation 61 response for metal shredders stated that "Data gathering is in progress and weather dependant, dataset will be available by 31.10.22 to inform update of emissions inventory by 31.12.22" however due to an exceptional prolonged period of dry weather this timescale will need to be extended. It is proposed dataset will be available by 28.02.23 and emissions inventory updated by 30.04.23.</p> <p>We are not currently in compliance with appropriate measures subsection 6.4.4. POPs may leach or wash out in particulates from some wastes, such as shredded WEEE plastic or granulated cable, if exposed to the weather. You must prevent the release of POPs to water or sewer by storing these wastes and any other shredded POPs waste under weatherproof covering.</p> <p>Shredded SMW fractions that are considered to be persistent organic pollutant (POPs) waste are not currently all undercover. BAT did not specifically require this. We can put an improvement programme into place, it will take time to comply. We will work towards covering all bays with a proposed timescale for completion 30.06.23.</p>
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7. Emissions monitoring and limits appropriate measures	Answer Yes/No/ NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the emissions monitoring and limits appropriate measures given in the WEEE guidance, including (where relevant) the additional appropriate measures for WTEE?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, emissions to air point X) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance</p>	No	<p>As per response to metal shredder appropriate measures Reg 61, We are not currently in full compliance with appropriate measures subsection 7.1.1 Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to air, such as the:</p> <ul style="list-style-type: none"> <li>• average values and variability of flow and temperature</li> <li>• average concentration and load values of relevant substances and their variability</li> <li>• flammability, lower and higher explosive limits and reactivity</li> <li>• presence of other substances that may affect the waste gas treatment system or plant safety – for example, oxygen, nitrogen, water vapour, dust</li> </ul> <p>We are in the process of reviewing with stack emissions monitoring engineers, the requirements for the above information and will update emissions inventory accordingly if appropriate, by 31.12.22</p> <p>We are not currently in full compliance with appropriate measures subsection 7.2.1. Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to sewer or water, such as average values and variability of flow &amp; temperature</p> <p>The discharge is rainfall dependant and there are no process waters – it is therefore not appropriate to monitor flow or temperature. We therefore request a derogation.</p>
Does your facility have any point source emissions to air?	Yes	Point source emission to Air from Air Cleaning System (See 'Fragmentiser Process Diagram') A2

<p>If yes, provide details (including process/part of process producing the emission, location of the emission point, whether release is outside or inside building etc?)</p>		<p>Air from cleaning system of shredding of metal containing waste containing particulates (TSP)</p> <p>Point source emission to Air is not currently operational, there is no flow. This is located at the large magnet room, over the 1st and 2nd drum magnet (See 'Fragmentiser Process Diagram) A1</p>
<p>Are any of your point source emissions to air abated?</p> <p>If you answer Yes, confirm which emission points are abated, what forms of abatement are provided (for example condensation units, bag filters, carbon filters, and scrubbers see section 6.1), what plant or process it serves, and what pollutant(s) it abates.</p>	<p>Yes</p>	<p>Yes point source emissions point A2 air cleaning system is abated by cyclone system downstream of Mill chamber on transfer conveyor on shredder. Abates particulates / dust emissions to air</p> <p>The fragmentiser shredding box itself incorporates a water injection system on the mill, which has a variable flow that is adjusted depending on the environmental conditions at the time. Abates particulates / dust emissions to air.</p> <p>Post cyclone system, a wet scrubber system dampens dust particulates to further abate emissions.</p>
<p>Are there any emission limits in section 7.1 that apply to point source emissions to air from the treatment processes you undertake at your regulated facility (including those provided in the corresponding section of the WTEE appropriate measures)?</p> <p>If yes, confirm the emission limits that are relevant to the point source emissions to air from your regulated facility.</p> <p>If there are emission limits listed for the waste treatment processes undertaken at your regulated facility but you believe they are not relevant you must provide evidence to justify this (for example, demonstrate that the substance in question is not in the emissions inventory of your regulated facility through your waste pre-acceptance and acceptance procedures and monitoring data).</p>	<p>Yes</p>	<p>Yes</p> <p>Dust 6 monthly. The plant has "other abatement techniques" Emission limit of 10 mg/m3</p>
<p>Does your treatment process meet the relevant emission limits given in the guidance for point source emissions to air?</p>	<p>Not / Yes</p>	<p>Dust - Emission limit of 10 mg/m3</p>

<p>If you answer No, confirm which emission limits and by when you will meet the requirements. By August 2022, unless we approve a derogation, existing installations must comply with relevant emission limits specified in section 7.1. These reflect the relevant BAT associated emission levels (AELs) provided in the Waste Treatment BAT Conclusions document.</p>		<p>Some recent results have been non-compliant, but historically results have been compliant. Significant repairs to the system have been made and further repairs are in progress to ensure results will be compliant going forward.</p>
<p>Will you monitor your point source emissions to air for all relevant parameters and substances in accordance with the monitoring requirements?</p> <p>If there are monitoring requirements listed for the waste treatment processes undertaken at your regulated facility but you believe they are not relevant or the monitoring frequency should be reduced, you must provide evidence to justify this (for example, demonstrating that the substance in question is not in the emissions inventory of your regulated facility (for example through your waste pre-acceptance and acceptance procedures and monitoring data)).</p>	<p>Yes</p>	
<p>Does your facility have any point source emissions to water (surface water, sewer or groundwater)?</p> <p>If yes, provide details (including source of the water being discharged, what it is being discharged to)</p> <p>If you discharge to surface water or groundwater (e.g. via soakaway) confirm whether the discharge is authorised by your environmental permit or by an alternative permission.</p> <p>If the emission is to sewer provide a copy of the discharge consent.</p>	<p>Yes</p>	<p>S2) to the foul sewer on Foundry Lane, which is collected and treated by Severn Trent Water Company. Rainfall dependant site run off potentially containing oil, metals, solids. Authorised by TEC.</p> <p>S1) discharge to foul sewer of sewage - domestic type discharge, shown on site plan and in permit for completeness.</p>
<p>Is there any storage or treatment of water or effluent on site prior to discharge?</p> <p>If you answer Yes, confirm what forms of treatment are provided (for example separation, flocculation, settlement), what plant or process it serves and what pollutant(s) it treats.</p>	<p>Yes</p>	<p>Oil water separator (interceptors) on discharges to S2. Separate out oil from water and settlement of solids. Discharge from S2 to sewer Severn Trent Water</p>

<p>Are there any emission limits in section 7.2.3 that apply to point source emissions to water (surface water, sewer or groundwater) from the treatment processes you undertake at your regulated facility?</p> <p>If yes, confirm the emission limits that are relevant to the point source emissions to water (<b>surface water, sewer or groundwater</b>) at your regulated facility.</p> <p>If there are emission limits listed for the waste treatment processes undertaken at your regulated facility but you believe they are not relevant, you must provide evidence to justify this (for example, demonstrating that the substance in question is not in the emissions inventory of your regulated facility (for example through your waste pre-acceptance and acceptance procedures and monitoring data) or that the downstream waste water treatment plant abates (treats) the pollutants concerned and does not lead to a higher level of pollution in the environment).</p>	<p>Yes</p>	<p>Relevant BAT AELs are as follows:  Hydrocarbon Oil Index (HOI) 10mg/l whether direct or indirect (to water body or to sewer)  TOC 60mg/l  COD 80 mg/l  Total suspended solids (TSS) 60 mg/l  cadmium (Cd) – emission limit 0.05 mg/l  chromium (Cr) – emission limit 0.15 mg/l  copper (Cu) – emission limit 0.5 mg/l  nickel (Ni) – emission limit 0.5 mg/l  lead (Pb) – emission limit 0.1 mg/l  zinc (Zn) – emission limit 1 mg/l  If in emissions inventory:  arsenic (As) – emission limit 0.05 mg/l  mercury (Hg) – emission limit is 5 ug/l</p>
<p>Does your treatment process meet the relevant emission limits given in the guidance for point source emissions to water?</p> <p>If you answer No, confirm which emission levels and by when you will meet them. By August 2022, unless we approve a derogation, existing installations must comply with relevant emission limits specified in section 7.2.3. These reflect the relevant BAT associated emission levels (AELs) provided in the Waste Treatment BAT Conclusions document.</p>	<p>Not known</p>	<p>As per response to metal shredder  The site discharges are to sewer, we request a derogation on basis that the EA verbally agreed during previous discussions regarding BAT / BREF with industry and the BMRA that for discharges to sewer the point of assessment would be post WWTW. The water discharged to sewer is treated at WWTW prior to discharge to the environment. There is a charge associated with discharges to sewer, so to have to pay a WWTW to treat water after we have incurred additional costs to treat to standard that could be discharged to surface water is unjustified and has no environment benefit.  EA have since confirmed via FAQ's on 01.04.22 that BAT AEL's will be applied at point the effluent leaves site, even if discharge to sewer. From FAQ</p>

**8. We have a trade effluent consent for discharge of wastewater from our installation to sewer for treatment at Waste Water Treatment Works. Can the EA explain how and where BAT AELs will be applied?**

**EA Response:** We are required to set emission limit values (ELVs) that ensure compliance with the BAT-AELs. This is mandated by Article 15(3) of the Industrial Emissions Directive (2010/75/EU) and is retained EU law.

We must also ensure permits include all measures necessary to comply with Article 11 i.e. that all appropriate preventive measures are taken against pollution; the best available techniques are applied; and no significant pollution is caused. A permit must also contain ELVs for pollutants 'which are likely to be emitted from the installation concerned in significant quantities, having regard to their nature and their potential to transfer pollution from one medium to another' (Article 14(1)(a)). This covers both direct and indirect discharges.

For indirect discharges to water (i.e. to sewer) it is not acceptable to transfer pollutants from one medium to another e.g., from wastewater to soil via the sludge, instead of using on-site treatment to destroy or transform the pollutants.

BAT conclusions are the reference for setting the permit conditions (Article 14(3)) and where BAT conclusions do not address all environmental effects we must consult and then set permit conditions based on BAT (Article 15(6)).

ELVs for polluting substances shall apply at the point where emissions leave the installation, disregarding dilution prior to that point. For indirect releases into water, the effect of a water treatment plant may be taken into account when determining the ELVs of the installation concerned, provided that an equivalent level of protection of the environment as a whole is guaranteed and provided this does not lead to higher levels of pollution in the environment.

This is not reasonable. The Trade Effluent Consent includes most parameters listed in BAT AEL's, with the exception of HOI, TOC, As and Hg and the site is typically compliant with TEC limits.

We request EA reconsider applying BAT AEL's at point of discharge from site and apply post WWTW.

If BAT AEL's are applied at site, a derogation in terms of timescales will be required please to meet BAT AEL's given the moved goalposts for discharges to sewer. Proposed timescale 30.06.23

<p>Will you monitor your point source emissions to water for all relevant parameters and substances in accordance with the monitoring requirements set out in 7.2.2 and 7.2.3 of the guidance?</p> <p>If there are monitoring requirements listed for the waste treatment processes undertaken at your regulated facility but you believe they do not apply or the monitoring frequency should be reduced, you must provide evidence to justify this (for example, demonstrating that the substance in question is not in the emissions inventory of your regulated facility (for example through your waste pre-acceptance and acceptance procedures and monitoring data) or that the downstream waste water treatment plant abates (treats) the pollutants concerned and does not lead to a higher level of pollution in the environment).</p>	yes	<p>Please note that UK laboratories do not offer tests for HOI to EN ISO-9377-2. This has been discussed with Laboratories and also with EA previously and it is accepted that EPH is an equivalent test.</p> <p>Note: the discharge from site is rainfall dependant run off and it is therefore not relevant or appropriate to monitor temperature or flow.</p>
<p>Do you currently monitor your regulated facility's point source emissions to air or water for any substances or parameters that are not listed in the guidance?</p> <p>If you answer Yes, please detail the parameters or substances monitored, the monitoring methods, monitoring frequencies and any limits imposed.</p>	yes	<p>pH, Ammoniacal Nitrogen, Fe, Al, NVM, P, Sn, Sb</p> <p>Currently quarterly, will monitor monthly going forward so in line with other parameters being monitored under BAT AEL's. Test methods UKAS / ISO17025 accredited. Please note monitoring is rainfall dependant.</p>
<p>Do you have an up-to-date emissions inventory for the point source emissions to air and water of your regulated facility?</p>	No	<p>The emissions inventory doesn't contain all the relevant information specified in appropriate measures. We are currently in the process of reviewing the emissions inventory and will be able to provide updated inventories following gathering of data projected date for updating emissions inventories 30.04.23</p>
<p>Do you have an up-to-date H1 environmental risk assessment for the point source emissions to air and water of your regulated facility?</p>	Yes	<p>Note appropriate measures requires additional monitoring e.g. TVOC to air etc. As, TOC to water, hence will need to review H1 after data gathering exercise. We will review H1 following data gathering exercise and review of emissions inventory. Projected date for completion of H1 31.04.23.</p>

<p>Do you currently monitor your facility's point source emissions to air or water?</p> <p>If you answer Yes, please detail the parameters or pollutants monitored and the monitoring methods and frequencies used.</p>	<p>Yes</p>	<p>This is a duplicate of previous questions</p>
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8. Process efficiency appropriate measures	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the process efficiency appropriate measures given in the WEEE guidance?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, energy efficiency point 2) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and your justification.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p>	Yes	



9. Hazardous substance release	Response / Reference to attached document
<p>Where you are undertaking a listed activity which involves the use, production or release of a relevant hazardous substance (as defined in Article 3(18) of the Industrial Emissions Directive), you must carry out a risk assessment considering the possibility of soil and groundwater contamination at the installation with such substances. Where any risk of such contamination is established, either:</p> <ul style="list-style-type: none"> <li>• prepare and submit a baseline report<sup>1</sup> containing information necessary to determine the current state of soil and groundwater contamination; or</li> <li>• provide a summary report referring to information previously submitted where you are satisfied that such information represents the current state of soil and groundwater contamination, so as to enable a <u>quantified</u> comparison to be made with the state of soil and groundwater contamination upon definitive cessation of the activity.</li> </ul> <p>If you have concluded that there are no risks of soil and groundwater contamination, provide a copy of the risk assessment.</p>	<p>As per Metal Shredder Regulation 61 response, This is not a requirement of BAT</p> <p>A baseline site condition report will be submitted by 31.12.22</p> <p>The site surface is concrete and there is no pathway by which soil / groundwater contamination could occur.</p>

<sup>1</sup> Baseline report - Defra Guidance - Industrial emissions Directive EPR Guidance on Part A installations (Section 5.10 – 5.15, pages 28-29)  
<https://www.gov.uk/government/publications/environmental-permitting-regulations-guidance-on-part-a-installations>

10. Site infrastructure plan	Response / Reference to attached document
<p>Provide a copy of an up-to-date site infrastructure plan (or plans) to include the relevant items in the guidance Develop a Management System for Environmental Permits, in particular:</p> <ul style="list-style-type: none"> <li>• Buildings (with any internal storage areas identified)</li> <li>• Storage bays and areas, tanks, skips</li> <li>• Treatment plant</li> <li>• Drainage including direction of flow of water in the drain; surface water drainage; discharge points to sewer, watercourse or soakaway; manhole covers and drains</li> <li>• Location of point source emissions to air and water (including sewer)</li> <li>• Waste quarantine area</li> <li>• Entrances and Exits to be used by the emergency services</li> <li>• Surfacing types (for example permeable unmade ground, impermeable hard standing) and containment measures (for example bunds and kerbing)</li> </ul> <p>In addition, the plan(s) should include the maximum capacities of the individual storage areas (number of pallets, containers or appliances etc. and tonnes equivalent).</p> <p>If the site plan in your current Environmental Permit is out of date, you should provide an up-to-date plan for the permit review, showing the location and permitted boundary of your facility and the location of permitted emission points to air and water (including sewer).</p>	<p>As per response to metal shredder appropriate measures Reg 61.</p>

11. Types of waste	Answer Yes/No	Details of waste accepted / Reference to attached document
<p>Are you permitted to accept wastes other than WEEE?</p> <p>If you answer Yes and the other wastes include chemical wastes, metal waste or non-hazardous waste, unless you have already responded to a separate regulation 61 notice concerning those wastes, tell us:</p> <ul style="list-style-type: none"> <li>• if you are currently complying with all the appropriate measures given in the relevant appropriate measures for permitted facilities guidance for those waste types.</li> <li>• which appropriate measures you are not currently in compliance with including subsection heading and numbered points and tell us when you will be in full compliance.</li> <li>• whether you believe some appropriate measures in this guidance are not applicable and explain which ones they are including sub section heading and numbered points.</li> </ul> <p>If you are proposing alternative measures to those in that guidance, indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p>	Yes	The site is a metal shredder, metal recycling site, please see response re Metal Shredder appropriate measures for details of activities.
<p>Are you permitted to accept non-EWC coded wastes (for example UK waste classification system or Department of Environment codes)?</p> <p>If you answer Yes, please provide details of the waste types and the equivalent EWC codes and descriptions.</p>	No	

<b>12. Existing Pre-operational Conditions</b>	<b>Answer Yes/No</b>	<b>Details of outstanding pre-operational conditions / Reference to attached document</b>
Do you have any outstanding pre-operational conditions in your existing permit?	No	
<b>13. Existing Improvement Conditions</b>	<b>Answer Yes/No</b>	<b>Details of outstanding pre-operational conditions / Reference to attached document</b>
Do you have any outstanding improvement conditions in your existing permit?	No	
<b>14. Overlapping waste operations</b>	<b>Answer Yes/No</b>	<b>Permit number</b>
Are there any overlapping waste operation permits on the site?  If yes, please provide permit number.	No	
<b>15. Waste Exemptions</b>	<b>Answer Yes/No</b>	<b>Response /Reference to attached document</b>
Are any wastes accepted under an exemption within the boundary of the installation permit?  If yes, please provide details.	No	

16. Standard Rules Permits	Answer Yes/No	Response /Reference to attached document
<p>Are any wastes accepted under a Standard Rules Permit within the boundary of the installation permit?</p> <p>If yes, please provide details.</p>	No	
17. Combustion plant or specified generators on site	Answer Yes/No	Response / Reference to attached document
<p>Do you have a combustion plant or generator(s) associated with your permitted activity?</p> <p>If you answer Yes, tell us:</p> <ul style="list-style-type: none"> <li>• the individual thermal input of your combustion plant(s) and/or generator(s), including any additional back-up diesel generators.</li> <li>• the date that each combustion plant and generator came into operation.</li> <li>• the type of plant (boiler, engine etc).</li> <li>• the fuel used.</li> <li>• the hours of operation per year.</li> <li>• if applicable, details of contracts to supply electricity or do Triad specifically the date entered into the contract or agreement.</li> </ul>	No	
18. <a href="#">Climate change</a>	Answer Yes/No	Response / Reference to attached document
<p>Have you considered whether your operations could be affected by a changing climate, for example by having a climate change adaptation plan in place?</p>	Yes/No	<p>Sims has started the process of considering the risks a changing climate poses to our operations and in future will have appropriate plans in place to assess and manage future risks. In 2021, as a business, Sims progressed our approach to assessing climate risks and opportunities by performing climate scenario</p>

		<p>analysis to assess potential financial-related impacts of key risks and opportunities. Climate risk is managed through our Enterprise Risk Management (ERM) framework, which is designed to support each business unit in the effective management of risk. It enables a consistent approach to risk identification, management and monitoring through the use of a global risk taxonomy. The work conducted at group level will inform the UK plans. Reference Sustainability Report 2021</p> <p>Recently the EA brought to the attention of industry via FAQ's on 01.04.22 that "It is anticipated that all waste permits will have EMS to ensure that sites have adequate climate change adaptation plans. We are currently producing new guidance on Climate Change. Where a plan is required but not yet in place we would include an improvement condition to address this." This new guidance will be considered when issued.</p>
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In all cases, where information required by this notice has been previously submitted to and accepted by the Environment Agency, and where this remains current and valid, you do not need to resubmit it. Instead, clearly specify the nature of the information and the date it was submitted, with the document reference and version number.

**Key URLs for guidance:**

<https://www.gov.uk/guidance/XXXX>

<http://eippcb.jrc.ec.europa.eu/reference/wt.html>

<https://www.gov.uk/guidance/best-available-techniques-environmental-permits#how-to-propose-an-alternative-technique>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010L0075>

<http://www.legislation.gov.uk/ukxi/2018/110/regulation/16/made>