[redacted]

From: [redacted]
Sent: 21 January 2026 12:01
To: [redacted]
Cc:
Subject: RE: FP Jan 2026 _ Clearway Belfast _ WML 31/20
Attachments: Working PLan - Clearway_Belfast - 2025_Rev B.doc; Belfast MASTER FP Calculation template for non-landfill activities_Jan 2026.xlsx; Re: Working Plan - Review

Hi [redacted]

[redacted] is off today so I am responding to your e-mail and to the one you sent me on Monday with the updated Working Plan.

I am content that the changes I requested in Point 1 and 2 of the attached e-mail have been addressed i.e. Waste description have been attached to the EWC Codes in Section 1(b) and the Fire contacts have been updated. The maximum storage capacities detailed on Section 1(b) are however still different from those detailed in the Site Data / stockpiles section and both are different from those detailed on the attached Financial Provision (FP) calculation.

I think the easiest way to rectify this would be to add an additional summary table to the end of Section 1 (b) which combines the individual waste codes into the broader waste type headings such as Depolluted ELVs, Undepolluted ELVs, Ferrous Metal, Non-Ferrous Metal, Ferrous filings and turnings, non-ferrous filings and turnings, glass, plastic, shredder waste, batteries, WEEE etc . The table should be titled "Maximum Permitted Storage Capacities" and the combined quantities must accurately reflect the maximum proposed quantity for each waste type to be stored on the site, the quantities detailed on the FP calculation must then match this.

Appreciate if you could also clarify what Appendix 3 relates to as we were unsure and thought it may be part of the Fire Action Plan as it contains burn times and risk ratings. Appreciate if you could also clarify why these quantities differ from Section 1(b).

Can you also confirm the figure of [redacted] per tyre as typically the cost for disposal of tyres is around [redacted] please? I am content with all other unit costs.

This information should be provided on or before 30 January 2025. Should you require any clarification regarding this e-mail, please do not hesitate to contact me.

Many thanks

[redacted]
Waste Management Licensing

NIEA Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

An Agency within the Department of Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

An Agen Fair an' K

From: [redacted]@clearway-group.co.uk>
Sent: 21 January 2026 10:48
To: [redacted]@daera-ni.gov.uk>

Cc: [redacted]@daera-ni.gov.uk>; [redacted]@clearway-group.co.uk>
Subject: FP Jan 2026 _ Clearway Belfast _ WML 31/20

Dear [redacted]

We trust this finds you well.

As part of our annual evaluations, we are currently reviewing the Financial Provision (FP) for our East Twin Road site. We are writing to propose an adjustment to our bond and would greatly value your advice and feedback on our intended approach.

To more accurately reflect our evolving operational profile, specifically the growth in the volume of End-of-Life Vehicles (ELVs) and associated materials, we are seeking to increase our provision.

While our routine site management and physical capacity are typically capped at 42,500 T (as detailed in the attached Appendix 3: Site Data), our site's working plan (Section 1b, p.4) allows for a theoretical maximum of approximately 45,000 T to provide flexibility across EWC codes. We propose that the FP calculation be based on this upper threshold of 45,000 T.

We are eager to ensure this alignment meets your expectations and would welcome your guidance on whether this proposal is acceptable to the Department. We remain available to discuss any adjustments you may deem necessary.

Thank you for your time and assistance in this matter.

Yours sincerely,

Clearway Metal Recycling

Hammond Lane Metal Company

Tel: 02890 457556 Ext 227 | [redacted]@clearway-group.co.uk

[redacted]

From: [redacted]@clearway-group.co.uk>
Sent: 19 January 2026 11:31
To: [redacted]
Cc:
Subject: Re: Working Plan - Review

Follow Up Flag: Follow up
Flag Status: Flagged

[redacted]

We are pleased to have attached a revised working plan (Rev B – Jan 2026) for Clearway, Belfast. We have made the recommended adjustments to Section 1(b) by adding the EWC code descriptions, added the out of hours contact and updated the stockpile details in the site data section to align with our current commodities and capacities. We will forward our revised FPs for the site to [redacted] as soon as possible. Thank you.

Aye,

[redacted]

From: [redacted]@daera-ni.gov.uk>
Sent: 29 December 2025 13:56
To: [redacted]@clearway-group.co.uk>
Cc: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: FW: Working Plan - Review

[redacted]

Many thanks for the attached. I have reviewed the Working Plan and am very close to agreeing it however can the following couple of amendments be made please?

1. Section 1(b) – can the EWC code descriptions be added please? NIEA use this table when on site to assess stockpiles and waste streams, the EWC code description is required for this purpose.
2. In the section "Contacts in the case of a Fire / Emergency" please add the NIEA out of hours contact details 0800 807 060 and emergency-pollution@daera-ni.gov.uk
3. The maximum storage capacities detailed on Section 1(b) are different from those detailed in the Site Data / stockpiles section, please clarify. Financial Provision is based on the maximum storage capacities for the site so NIEA need to confirm what the maximum storage capacity of each waste type is. This should be the same as those detailed in the FP calculation.
4. The annual review of your FP is now due (see attached letters). Please complete and sign the attached FP calculation and return to my colleague [redacted] for approval.

Should you require any clarification regarding this e-mail, please do not hesitate to contact me.

Regards

[redacted]
Waste Management Licensing

From: [redacted]@clearway-group.co.uk>
Sent: 15 December 2025 15:55
To: [redacted]@daera-ni.gov.uk>
Cc: [redacted]@clearway-group.co.uk>
Subject: FW: Working Plan - Review

Hi [redacted]

[redacted] sent a copy to [redacted] before the end of Nov.

[redacted]

From: [redacted]@clearway-group.co.uk>
Sent: Wednesday, November 26, 2025 12:04 PM
To: [redacted]@clearway-group.co.uk>
Subject: Re: Working Plan - Review

Please see attached with comments. I can make any adjustments or additions.

Aye,

[redacted]

From: [redacted]@clearway-group.co.uk>
Sent: 25 November 2025 13:57
To: [redacted]@clearway-group.co.uk>
Subject: RE: Working Plan - Review

Hi [redacted]

I will be in Belfast tomorrow so that we can review possible changes. It may be more readable if we put some of the longer sections, such as the Fire Action Plan and the non-ferrous processing, into appendices.

[redacted]

From: [redacted]@clearway-group.co.uk>
Sent: 25 November 2025 11:31
To: [redacted]@clearway-group.co.uk>
Subject: Working Plan - Review

Dear [redacted]

I trust you are well. I have attached a copy of the Working Plan along with some notes for your review.

We have added some details regarding the ELVs as you instructed. [redacted] has confirmed all the measurements of the "cuts" and plant descriptions are accurate at the time of writing.

[redacted] was passed the site drawings and a draft of the revisions for professional production. I will be in touch with [redacted] again to find out his progress or, at the very least his prognosis.

I hope this finds your favour.

Aye,

Clearway Metal Recycling

Hammond Lane Metal Company
Part of the Clearway Group

Tel: 02890 457556 Ext 227 | [redacted]@clearway-group.co.uk

Clearway Disposals Ltd

East Twin Rd, Belfast Harbour, BT1 2BB

Working Plan

Processing Ferrous and Non-Ferrous metals by Shredding, Shearing, Baling and Segregation and Separation. Transport of waste and collection End of Life Vehicles of and an Authorised Treatment Facility for their depollution

Revision B

January 2026

Contents Page

1. **Site Operations**
   a. Waste Types
   b. Waste Quantities
   c. Waste Acceptance and Control Procedures
   d. Waste Management Processes
   e. Waste Handling and Treatment Operations, and their Control
   f. Plant and Equipment
   g. Waste Storage
   h. Waste Quantity Measurement Systems
   i. Hours of Operation
   j. Staffing and Supervision

2. **Site Engineering, containment and drainage systems**

3. **Site Infrastructure**
   a. Provision of site identification board
   b. Site Security

4. **Amenity Management and Reporting**
   a. Monitoring and Control of Mud and Debris
   b. Monitoring and Control of Leaks and Spillages
   c. Monitoring and Control of Dust, Fibres and Particulates
   d. Monitoring and Control of Odours
   e. Monitoring and Control of Noise
   f. Monitoring and Control of Pest Infestations
   g. Monitoring and Control of Litter
   h. Fire Action Plan
   i. Safety and Emergency Procedures

5. **Site Records**
   a. Provision of a Site Diary
   b. Security and availability of records
   c. Records of waste movements

Appendices

Appendix 1: Site Drawings and Plans

- Drawings A & B. Illustrate the location of all activities on site.
- Drawing C Site Drainage Plan. Shows the four site drainage layouts, including the locations of interceptors and discharge points.

Appendix 2: Fire and Site Data

- Fire Action Plan. Contains the formal emergency procedure and defined responsibilities.
- Site Data. Provides details of the stockpiles and equipment available for moving materials and equipment in case of a fire.
- Note: This appendix is also referred to as the “Drainage Plan” (A02, Rev-J) in the Site Engineering section, detailing the drainage system.

Appendix 3: Technical Competence

- WAMITAB Certificate – Technical competency.

Appendix 4: IMS Procedures

- ISP4.04 Transport Operations.
- ISP4.11 Waste Disposal
- ISP4.16 Depollution of ELVs

1. Site Operations

a. *Waste Types*
b. *Waste Quantities*

EWC Code	Description	Max Stock (T)	Max Time	Max Daily Intake (T)	Max Annual Intake (T)	Reference
02 01 10	Waste metal from agriculture, horticulture, aquaculture, forestry, hunting & fishing	25	1 month	2	200	Licence
02 01 10	Waste metal from agriculture, horticulture, aquaculture, forestry, hunting & fishing	25	1 month	2	200	Permit
10 03 16	Aluminium skimming other than those mentioned in 10 03 15	10	1 month	0.8	40	Licence
11 05 01	Hard zinc	25	1 month	2	110	Licence
11 05 02	Zinc ash	10	1 month	0.8	40	Licence
12 01 01	Ferrous metal filings and turnings	700	3 months	15	3750	Licence
12 01 02	Ferrous metal dust and particles	10	1 month	1	50	Licence
12 01 03	Non-ferrous metal filings and turnings	25	1 month	3	150	Licence
12 01 13	Welding wastes	2	1 month	0.2	10	Licence
12 01 17	Waste-blasting material other than those mentioned in 12 01 16	2	1 month	0.2	10	Licence
12 01 99	Wastes not otherwise specified (Metal machining)	2000	3 months	60	15000	Licence
15 01 04	Metallic packaging	20	1 month	1	100	Licence

16 01 03	End-of-life tyres	4	1 month	0.2	10	Licence
16 01 04*	End-of-life vehicles (Hazardous)	150	1 month	50	12500	Permit
16 01 06	End-of-life vehicles (containing no liquids/hazardous components)	3000	1 month	450	105000	Permit
16 01 12	Brake pads other than those mentioned in 16 01 11	2	1 month	0.2	10	Licence
16 01 16	Tanks for liquefied gas	2	1 month	0.2	10	Licence
16 01 17	Ferrous metal (from ELV)	100	1 month	16	4000	Permit
16 01 18	Non-ferrous metal (from ELV)	200	1 month	30	7500	Permit
16 01 18	Non-ferrous metal (from ELV)	5	1 month	0.5	75	Licence
16 01 19	Plastic	5	1 month	0.8	40	Licence
16 01 20	Glass	5	1 month	0.8	40	Licence
16 01 21*	Hazardous components other than 16 01 07 to 16 01 11/13/14	20	3 months	0.5	50	Licence
16 01 22	Components not otherwise specified	5	1 month	2	100	Licence
16 01 99	Wastes not otherwise specified (ELV components)	5	1 month	0.8	40	Licence
16 02 14	Discarded equipment other than 16 02 09 to 16 02 13	10	1 month	0.7	175	Licence
16 02 16	Components removed from discarded equipment other than 16 02 15	5	1 month	0.8	40	Licence
16 06 01*	Lead batteries	50	1 month	5	1000	Licence

16 08 01	Spent catalysts containing gold, silver, rhenium, rhodium, etc.	2	1 month	0.2	10	Licence
17 04 01	Copper, bronze, brass	50	1 month	5	800	Licence
17 04 02	Aluminium	3	1 month	1	340	Licence
17 04 03	Lead	30	3 months	1	150	Licence
17 04 04	Zinc	5	1 month	0.4	20	Licence
17 04 05	Iron and steel (Construction/Demolition)	3000	3 months	60	15000	Licence
17 04 05	Iron and steel (Construction/Demolition)	1000	1 month	80	20000	Permit
17 04 06	Tin	2	1 month	0.2	10	Licence
17 04 07	Mixed metals	1	2 months	1	25	Permit
17 04 11	Cables other than those mentioned in 17 04 10	5	1 month	0.8	40	Licence
19 01 02	Ferrous materials removed from bottom ash	3	1 month	0.6	30	Licence
19 10 01	Iron and steel waste (Shredder waste)	150	1 month	10	2000	Licence
19 10 01	Iron and steel waste (Shredder waste)	1250	1 month	Processed	2000	Licence
19 10 01	Iron and steel waste (Shredder waste)	3750	1 month	Processed	2000	Permit
19 10 02	Non-ferrous waste (Shredder waste)	50	1 month	Processed	N/A	Licence
19 10 02	Non-ferrous waste (Shredder waste)	150	1 month	Processed	N/A	Permit
19 10 04	Fluff-light fraction and dust other than 19 10 03	500	2wks	Processed	N/A	Permit

19 10 04	Fluff-light fraction and dust other than 19 10 03	500	3 months	Processed	N/A	Permit
19 10 05*	Other fractions containing hazardous substances	25	1 month	125	25	Licence
19 10 06	Other fractions other than 19 10 05	1000	3 months	Further processing	N/A	Permit
19 10 06	Other fractions other than 19 10 05	9000	12 months	Further processing	N/A	Permit
19 10 06	Other fractions other than 19 10 05	3500	1 month	Processed	60000	Licence
19 12 02	Ferrous metal (Mechanical treatment)	2500	1 month	50	12000	Licence
19 12 02	Ferrous metal (Mechanical treatment)	3500	1 month	100	22500	Permit
19 12 03	Non-ferrous metal (Mechanical treatment)	25	1 month	5	1000	Licence
19 12 03	Non-ferrous metal (Mechanical treatment)	75	1 month	5	1000	Permit
19 12 12	Other wastes other than those mentioned in 19 12 11	8000	1 month	Further processing	50	Licence
20 01 34	Batteries other than those mentioned in 20 01 33	2	1 month	0.2	10	Licence
20 01 36	Discarded electrical/electronic equipment (non-hazardous)	25	1 month	2	100	Licence
20 01 40	Metals (Municipal waste)	50	1 month	5	200	Licence
20 01 40	Metals (Municipal waste)	50	1 month	5	800	Permit

All codes and descriptions used in these tables are sourced from the List of Waste (LoW) as defined and assessed within the Technical Guidance WM3: Waste Classification (1st Edition v1.2.NI).

c. Waste Acceptance and Control Procedures

Waste Reception

Any person delivering waste to the site, other than the licence holder or his employees, shall report to site staff before depositing the waste. They shall be directed to the appropriate waste storage area by the site staff.

Waste Records

A record shall be kept of all vehicles or ships depositing or removing waste. Records will be kept of the quantities of waste being brought on and taken off-site. Duty of Care Waste Transfer Notes, Consignment Notes and Annex VII are signed and stored in the weighbridge office.
These records will be made available during site opening hours to any Authorised Officer of the NIEA on request.

Quarterly Returns are submitted to NIEA with a summary of the waste which has been deposited or removed from the site in the previous quarter. An annual report is also submitted to NIEA.

Rejection of Wastes

All loads of scrap metal are inspected. If inappropriate material is found, the load will be rejected, and the vehicle will be turned away. If the rejected load is believed to contain Hazardous Waste, the NIEA will be informed of the decision and the reason for the return of the load.

Radiation Detection

Radiation detectors are located at the input weighbridge to prevent radioactive material from being received into the site. A hand-held radiation detector is used to check any material that is suspected of emitting radiation. The hand-held radiation detector is also used to check export container loads of non-ferrous and the empty ship's hold before loading ferrous materials.

The discovery of radioactive material will be reported to the NIEA Industrial Pollution & Radiochemical Inspectorate (IPRI), NIEA Lisburn, 17 Antrim Road Tonagh, Lisburn, Co. Antrim, BT28 3AL; Tel. 028 9056 9299; email: ipri@daera-ni.gov.uk

d. *Waste Management Processes*
e. *Waste Handling and Treatment Operations, and their Control*

Shredding and separation of scrap metals including treated ELVs

The shredder process is an industrial system used to break down end-of-life vehicles and other metal scrap into small, manageable pieces to enable separation/recycling.

Infeed and Metering

Prepared vehicle hulks, bales or scrap are placed onto the infeed conveyor using a materials handler fitted with a grapple. The shredder operator feeds the material into the shredder at a controlled rate to maintain steady processing and prevent jams.

Primary Shredding (Hammermill Operation)

The heart of a shredder is a large hammermill, which consists of a high-speed rotating rotor with high-mass hammers that smash the scrap into progressively smaller pieces, tearing apart steel, aluminium, and non-metallic materials.
Water injection systems are used minimise dust, noise, emissions, and fire risk.

Discharge and Initial Separation

The shredded material exits the mill onto a vibrating feeder. The mixed fragments first pass into an air classifier with cyclones to separate light materials (fluff) from the heavier metals, non-ferrous metals and non-metals. The light materials (fluff) are sent to a licensed landfill for disposal.

Ferrous Metal Recovery

A series of magnetic separators removes ferrous metals.
There are two hand-picking lines to remove alternator and large pieces for rubber with magnetic metals attached.

Non-Ferrous Metal Recovery

After ferrous removal, the remaining mix contains a mixture of non-ferrous metals and heavy non-metals, which is first screened at 0-20mm, 20-150mm and over 150mm using a trommel screen. This facilitates metal recovery where the primary process for non-ferrous recovery is Eddy Current Separators (ECSs).

Post Shredder Separation Technology (PSST) Plant
Recovering residual metals from eddy current separator (ECS) residues using sensor-based detection and air separation.

The PSST plant is a multi-stage recycling plant using:

- A loading shovel is used to load material into a hopper with an automatic belt feeder that controls the feed rate onto inclined conveyer that transfers the material into the plant at rate of about 8 tonnes per hour.
- The first process is magnetic separation to pull out ferrous metals (iron, steel)
- Then a high frequency eddy-current separator removes some residual non-ferrous metals (aluminium, copper, etc.)
- Next an induction sorting machine (ISS) set at high sensitivity removes most of the remaining metals (stainless steel, copper wire and circuit boards etc.)
- A second induction sorting machine (ISS) set at lower sensitivity removes only stainless steel leaving the remaining metals
- Finally, a combined sorting machine (KSS) removes copper wires.
- Hand pickers remove contamination from the final stainless-steel line and residue from metals from the KSS residue missed by the KSS

The Induction Sorting System (ISS) is designed specifically for metal detection and separation based on conductivity. It recovers residual metals that might remain after magnetic and eddy-current separation.

Material is accelerated on a belt into a detection zone. Under the conveyor belt is an inductive sensor coil (or coils) that generates an electromagnetic field. When a conductive object (metal) enters the field, it perturbs the field; the sensor picks that up. After detection, a compressed-air jet ejects the detected metal piece from the conveyor (via targeted deflection). The systems can work on particle sizes from 1 mm up to 200 mm,

The KSS (“Kombinationssortiersystem” / Combined Sensor Sorting System) is a flexible, modular sorting machine. It allows for multiple sensor types on one platform 3D laser, and induction for sorting cables.

Objects pass on a conveyor. Sensors scan each piece. The 3D laser sensor measures shape/height; the induction sensor detects conductivity (i.e., metallic character).

Based on a programmed logic, the system sorts the materials where air jets eject the “good” metal particles.

Shearing oversize scrap

A Vezzani PC-AC hydraulic shear with 1400-tonne cutting force is used to cut oversize scrap into pieces with maximum size of 600mm x 300mm x 300mm. The oversize material is loaded into the shear with a Eurohydromec GF 55/16 pedestal crane. The cut material drops onto a vibrating feeder which transfers it onto an inclined radial stacking conveyer. The plant operator remotely controls the shear, the crane, and the radial conveyor.

Crane loads scrap into the shear feed box / hopper. For shears, the operator panel allows quick adjustment of pressure and stroke. Oversize scrap is loaded by a crane into the inclined feed box. Vezzani's PC / AC shears can be loaded continuously and are designed to minimize downtime.

The cutting cycle can be remotely adjusted to control cutting force, cut material length, and cycle time. The shear uses pre-compression to compact the scrap before cutting, increasing the density and cutting efficiency.

The guillotine descends, shears the scrap, then retracts. Once the shear has completed a cut and the ram is fully retracted, and cut material falls onto the vibrating feeder and then the radial conveyor.

The radial conveyor drops the cut material onto a stockpile which the operator can remotely move in a circular arc to maximise the storage capacity of the radial stockpile.

Sorting and processing non-ferrous scrap

Preparing non-ferrous scrap metal for recycling involves several steps to maximise purity, value, and recyclability.

The first stage is to separate non-ferrous from ferrous and from each other. The methods include manual sorting and cleaning and contaminant removal, such as oils, grease and coolants; plastics, rubber, and insulation; paint or coatings; attached steel or fasteners.

Mechanical processes include cable stripping and baling.

Non-Ferrous Metal Grading

Non-ferrous metals include aluminium, copper and its alloys (brass and bronze, lead and its alloys, zinc, nickel and its alloys, titanium.

Scrap Aluminium Grades

1 Clean Aluminium Grades

Clean Aluminium Extrusion (Clean 6063 / 6000-series)
- Window frames, door frames, architectural profiles
- No steel, plastic, rubber, hinges, screws, or paint
- Highest-value common grade in the UK

Clean Aluminium Sheet / Plate
- Pure or near-pure sheet
- No paint, no plastic film, no contamination
- Commonly factory offcuts

New Production Aluminium ("Clean New")
- Guillotine sheet, swarf from machining (clean)
- Factory scrap free from oil, paint, or alloys

2. Painted / Mixed Aluminium Grades

Painted Extrusion
- 6063/6061 profiles with paint or anodizing
- Must be free from steel fixings
- Lower price than clean extrusion

Old Rolled Aluminium / Old Sheet
- Roofing, siding, pots/pans, signage
- Can have paint or lacquer
- Very common UK grade
- Light mixed grades from general scrap collections

3. Cast Aluminium Grades

Clean Cast Aluminium
- Engine parts, gearboxes, alloy casings
- Free from contaminants steel bolts, bearings, excess oil or rubber

Dirty Cast Aluminium
- Same as above but containing contaminants:
- Requires preprocessing in shredder plant

4. Specialist Grades
- Aluminium Wheels
- Aluminium Radiators
- EC Grade Aluminium Wire
- Turnings / Swarf
- Litho Plates, High-purity 1000-series sheet from printing

Scrap Copper Grades

1 Bright Copper Wire (High Grade)
- 99.9% pure copper, clean, uncoated, unalloyed
- Usually stripped electrical wire ≥ 1.5 mm thick
- No paint, solder, varnish, or insulation

2. No.1 Copper (Clean Copper)
- Clean copper pipe
- Clean bus bars
- Clean tube (no solder, paint, brass fittings)
- Minimum 98–99% purity, No grease, solder, brass, or contamination

3. No.2 Copper (Dirty Copper)
- Copper pipe with solder or paint
- Old heating pipes with small contamination
- Purity: around 94–96%

4. Copper Tank (Hot Water Cylinder)
- Clean copper tank: Foam removed, no brass fittings, no steel
- Dirty copper tank: With insulation, fittings, steel, or contaminants

5. Copper Cable / PVC Wire
- Household wire (30–40% copper)
- Thick armoured cable (higher % copper)
- Low-grade cable (10–20% copper, mixed)

6. Copper Radiators / Copper-Aluminium Radiators
- Copper Radiator (clean), no steel or attachments
- Copper/Aluminium (Cu/Al) Radiators, mixed metals

7. Copper Alloy Grades (Brass & Bronze).
- Brass
  - Clean brass (yellow brass)
  - Mixed brass
  - Gunmetal / phosphor bronze
  - Brass turnings/swarf
- Bronze
  - Clean bronze solids
  - Mixed bronze

Lead Scrap Grade

1. Soft Lead (Clean Lead / Pure Lead)
   - Roofing sheet, Flashings,
   - Cable sheathing (clean)

2. Hard Lead / Mixed Lead
   - Wheel weights
   - Lead pipes with scale or residues

3. Lead Batteries
   - Car/industrial lead-acid batteries

Zinc Scrap Grades

1. Zinc Diecast (Zamak / Mazak)
   - Automotive parts, handles, housings

2. Clean Zinc Sheet
   - Roofing zinc, architectural zinc

Nickel & Nickel-Bearing Alloy Scrap Grades

1. Nickel 200/201
   - Known purity Ni grades (industrial scrap)

2. Monel (Nickel–Copper Alloy)
   - Marine and chemical equipment
   - Typically, 60–70% Ni + Cu

3. Inconel / Incoloy (Nickel–Chromium Superalloys)
   - Aerospace scrap
   - Turbine components

4. Hastelloy & Other Superalloys
   - High-value specialised alloys

Stainless Steel Scrap Grades

1. Stainless 304 (18/8) – Grade 18/8
   - 18% chromium, 8% nickel
   - Sinks, catering equipment, tubing

2. Stainless 316 (Marine Grade)
   - 16% chromium, 10% nickel, 2% molybdenum
   - Marine/chemical applications

3. Stainless 430 (Magnetic Stainless)
   - 17% chromium, no nickel

4. Other common stainless categories:
   - Stainless turnings (swarf), clean or oily
   - Stainless solids (mixed 300-series)
   - Stainless mixed (lower grade, uncertain alloy)

Other Non-Ferrous Scrap Grades

Titanium from aerospace industry
Lead solder
Tungsten carbide

Depolluting end-of-life vehicles (ELVs)

Operatives may use IDIS or other manufacturer guidance to obtain depollution information on the ELV, if required in order to ensure they only accept ELVs that are suitable for the site.

During the cursory inspection operatives shall assess vehicle for health and safety hazards

ELVs accepted onto the site are stored on the secure concreted area at the ELV treatment and storage area (13) where they are contained until they are logged and the necessary details recorded.

The vehicles are transported by forklift to ELV depollution (13) where depollution takes place using the depollution equipment (section 1f. Plant & Equipment) and in line with the current Environment Agency guidance on Appropriate Measures for permitted ELV facilities and Clearway ISP4.16 (App 4).

The depollution process is as follows:

Vehicle Depollution Process

Operation
• Remove battery • Remove fuel filler cap and oil filler cap • Set heater to maximum • Remove wheels and separate lead balance weights • Remove any parts identified as containing mercury
Put vehicle onto support frame
• Drain engine oil and remove oil filter • Drain transmission oil, including rear differential if applicable • De-gas air conditioning unit (if fitted) • Drain coolant • Drain brake fluid • Remove catalyst (if fitted) • Drain washer bottle • Drain brake / clutch reservoir • Drain power steering reservoir (if fitted) • Drain fuel tank • Drain shock absorbers or remove suspension fluid • Replace drain plugs / fit plastic stoppers

Remove vehicle from support frame
• Remove air bags (if fitted, and cannot be deployed in-situ) • Deploy airbags in-situ (if fitted and able to conduct this operation)

- All fluids are stored in sealed double bunded tanks (Area 13).
- Car batteries are stored in secure battery storage shed (NF3 Battery Storage).
- Tyres are stored in the tyre storage bays (NF2).
- After depollution the ELVs are marked in permanent yellow paint with a “D” on the bonnet, driver’s side wing or driver’s side windscreen.
- The depolluted ELVs are then stored in (ELV) prior to shredding taking place.

Drawings A & B - Illustrate the location of all activities on site and are attached in Appendix 1

f. Plant and Equipment

The following is a list of associated with:

- Shredding and separation scrap metals including treated ELVs
- Recovering residual metals from eddy current separator (ECS) residues using sensor-based detection and air separation
- Shearing oversize scrap
- Sorting and processing non-ferrous scrap
- Collection of ELVs, transport of waste
- Depolluting end-of-life vehicles (ELVs)
- Maintenance of plant and equipment

Danieli Shredder

This is used to shred and separate metals and non-metallics from grade 5 scrap (cars, white goods etc.). The process requires 7/8 personnel.

The plant capacity is 75-120 tonnes per hour with a utilisation of 80%.

The shredder is powered by a 3000 kW electric motor.

A fan and cyclone scrubber remove lighter non-metallic materials.

Non-ferrous metals are separated from heavy non-metallics using Eddy Current Separators. Ferrous metals are recovered by a series of electromagnets.

The separation plant uses about 800 kW.

Lynxs Shredder (currently this shredder is not operational)

This is used to shred and separate metals and non-metallics from grade 5 scrap (cars, white goods etc).

The process requires 5/6 personnel.

The plant capacity is 50-70 tonnes per hour with a utilisation of 75%.

The shredder is powered by an 1875 kW electric motor.

Fans and cyclones remove lighter non-metallic materials. Non-ferrous metals are separated from heavy non-metallics using Eddy Current Separators (ECS).

Ferrous metals are recovered by a series of electromagnets. The separation plant uses about 500 kW.

Post Shredder Technology (PST) Plant

This is used to separate and recover residual metals from Eddy Current Separators (ECS) residues.

The process requires 4/5 personnel.

The ECS separators on the shredder plants are unable to recover stainless steel, copper wire and low conductivity non-ferrous metals.

The PST plant uses powerful rare earth magnets, high frequency eddy current separators, sensor-based induction separators, and laser-based shape detection separators to recover residual metals that could not be recovered using conventional magnetic or eddy current separators.

A second PST plant is scheduled for commissioning early in 2026. It will be used to process the 0-30mm ECS residues

Vezzani Shear

This is used to cut oversized heavy scrap into grade 1 scrap.

The process uses one operator.

The plant has an operating capacity of 20-25 tonnes per hour.

The machine is electro-hydraulic and has a 1400 tonne cutting force.
It is powered by 5 x 110 kW electric motors. It is loaded with a Eurohydromec GF 55/16 Pedestal Crane which is powered by an 80-kW electric motor.

The processed material is removed from the shear with a Vezzani steel belted radial stacking conveyor.

Balers & Non-Ferrous Equipment

Balers can be used for processing non-ferrous metals. The Harris TGS 57 90 kW Electrohydraulic baler produces 7-10 tonnes per day of baled aluminium, stainless steel or copper. The McIntyre 1 kW Electro-hydraulic baler produces 2-4 tonne per day of baled copper.

In the non-ferrous shed there is a Deltax cable stripper, a Shrink Wrap Machine, and a Niton XL2 XRF Analyser.

Material Handlers

Most of the material is handled using mobile material handlers (360-degree excavator type) fitted with either grabs or magnets. Currently the company use; four Sennebogen 835s materials handlers in the yard and one Sennebogen 870 materials handlers on the quay for loading and unloading ships; and five Liebherr materials handlers, one of which is fitted with a Le Bounty hydraulic shear.

Forklifts

The company has the following forklifts: 8 Hyster ranging from 2.5 to 10 tonne capacity; I Toyota 3 tonne; 1 Caterpillar 3 tonne; 1 DCE 3 tonne; 1 Yale 2.5 tonne and 1 Linde 2.5 tonne; 1 Apache 3 tonne.

Loading Shovels

The company uses large loading shovels for handling/ moving materials that cannot be readily moved by mobile cranes and for loading trucks.
The company also has I Caterpillar and 4 Volvo loading shovels. 3 JCB Loadalls and 1 JCB Robot are used for loading containers and for cleaning the yard and around the shredder downstream.

Lorries

The company also has 3 Volvo shunter trucks used to move materials within the site plus 1 Volvo shunter truck in reserve.
There are 1 skip lorry, 2 roll-on/roll-off truck, an articulated truck fitted with a grab. These are normally used to collect materials from suppliers.

Two double-deck car transporters and one single-deck transporter are used for ELV collection.
The double-deck transporter has capacity for 3 ELVs and the single deck transporter has capacity for 2 ELVs

There are 3 articulated lorries with ejector trailers normally used to transport waste to landfill, but they can also be used for collection scrap.

The company has two tankers, one of which is a vacuum tanker, which are used for handling liquid waste.
The vacuum tanker is used for cleaning the drains and interceptors.

ELV Depolluting Rig

SEDA Double Fixed Station Rig with complete tank farm allowing 2 vehicles to be depolluted at the same time with 2 drainage systems for oils, coolants, brake fluid, power steering, washer fluid, fuels, gearbox oil and differential oils. With this system it is possible to depollute up to 5 vehicles per hour.
Two Corghi Tyre removal machines are used to remove tyres from the rims.
A Cat 320 Powerhand is used to remove catalytic converters, air conditioning and air bag removal

Miscellaneous Plant and Machinery

Material entering the site is scanned for radiation using the Radiation Solutions Inc RS200 "gate" detectors and for scanning materials loaded into containers and a ship's hold, a RS11 handheld radiation detector.

In addition to fire hydrants, hoses and extinguishers located at various positions on the site there are 2 Dennis Fire Engines for firefighting, located in the main carpark.

There are 2 JLG Boom Lift cherry pickers for access at height; a Kato mobile crane; a Fabcon Container Tilter for loading 20ft containers; and a tractor fitted with brush for sweeping the yard.

All plant and equipment on site are serviced, and calibrated where necessary, on a regular basis and the associated documentation retained on site.

g. Waste Storage

All solid wastes, including ELVs (before and after depollution are stored in concreted areas outdoors, except for; high value metals; automotive batteries and fluff-light shredder fraction, which are stored inside dedicated buildings. The surface water from the concrete areas enters the drainage system through silt traps then through full retention interceptor before discharge.

Liquid wastes, including these from depolluting ELVs are stored in dedicated bunded area (13) constructed with reinforced concrete walls, or on bunded tanks Depollution takes place in the depollution building.

Batteries removed from ELVs are moved to the non-ferrous shed where there are stacked on pallets in layers separated by corrugated cardboard sheeting. The full pallets are shrink wrapped before being transported to the dedicated battery storage building (NF3) to await dispatch.

Depolluted cars are stored on stoned hard standing.

All wastes are stored securely.

h. Waste Quantity Measurement Systems

All wastes are weighed in and out of the site and all drivers must report to weighbridge operator, who records all waste receipts and dispatches in the company computer system.

The quantities / volumes of all hazardous wastes consigned from the site are recorded and kept. All weighing equipment is calibrated annually.

I Hours of Operation

The site is open to receive and dispatch scrap metals as follows:

Monday to Friday:	8.00am – 5.00pm
Saturday	8.00am – 1.00pm

Overtime is worked for processing material within the closed site:

Monday to Thursday:	6.30am – 8.00am and 5.00pm – 7.00pm
Friday	6.30am – 8.00am
Saturday	1.00pm – 2.30pm
Sunday	8.00am – 2.30pm

J Staffing and Supervision

All staff are adequately trained to carry out all activities on site, including depollution activities, driving mobile plant and machinery, operating processing plant etc. in a safe and environmentally sound manner ensuring pollution risk to the environment is minimised and controlled.

All activities shall take place as detailed in this working plan and the waste management licence.

The Group HR Manager, assisted by the H&S Officer ensure that all employees are fully trained for their role in the business.

The site is supervised and managed by an experienced site manager.

The Commercial Manager has a WAMITAB certificate (App 3), and the site manager is currently going through technical competency training.

3. **Site Engineering, containment and drainage systems**

Sealed drainage directs all liquids and run off from the areas detailed below through the oil interceptors as detailed in App 2, Drainage Plan (A02, Rev-J):

- The operational yard areas and all covered areas are fully concreted
- Bunded concreted storage area for fluids are located in Areas 13 and NF2 (App1, Drawing B).

In addition, see section *g) Waste Storage above*.

4. **Site Infrastructure**

a. Provision of site identification board

A site identification board is located at the left-hand side of the site entrance (RVP1) where it can be read by site users and other interested parties.

The board contains the details required in the waste management licence and permit:

- the site name, the site operator's name, principal address and telephone number
- the name, address and telephone number of by the NIEA
- telephone numbers and addresses of key personnel for emergency use
- the opening hours of the site
- the fact that the site is licensed/permitted by the NIEA

b. Site Security

The site is screened by a steel-clad fence approximately 4 meters high along the north, south and west boundaries. Shrubs and trees are planted on the west boundary outside the fence along East Twin Road.

The east boundary facing Musgrave Channel comprises plastic-coated chain-link fencing mounted on concrete posts approximately 2.8 meters high.

The main entrance gates are of steel-clad construction topped with steel mesh approximately 4 meters high. The gates to Musgrave Wharf are plastic coated chain link attached to a steel frame that is 2.8 metres high.

All fencing, gates and any other barriers or security measures to prevent unauthorised access to the site are maintained in full working order, and any damage which impairs their effectiveness shall be repaired as soon as practicable.

5. Amenity Management and Reporting

a) Monitoring and Control of Mud and Debris

The nature of the material onsite is unlikely to give rise to mud but there is a low risk of debris. Should any mud or debris escape onto the roadway it will be swept up promptly.
The concrete yard is swept regularly and cleaned down at the end of each working week.

b) Monitoring and Control of Leaks and Spillages

I. All cars and parts are stored as detailed in section g) Waste Storage above.

II. Spill kits are available at the locations marked on the site operations plan to deal with small spillages.

III. All surface water passes through the oil interceptors where contaminants are removed.

IV. Silt and debris are contained in the sealed drainage system and subsequently through the sumps in the silt traps which allows the sediment to settle.

V. This sumps in the silt traps are monitored and is periodically inspected and cleaned out by the company's tank cleaning operation.

VI. Major leaks or spillages which may run to the interceptor shall be isolated with bungs to ensure no spillages or contaminants that could cause pollution escape beyond the interceptor.

c) Monitoring and Control of Dust, Fibres and Particulates

Due to the nature of the work currently undertaken on this site it is unlikely that dust, fibres and particulates will be produced.

d) Monitoring and Control of Odours

Due to the nature of the work currently undertaken on this site no odours are produced that would be considered a nuisance.

e) Monitoring and Control of Noise

The company uses and external environmental noise consultant to carry out an annual noise survey and provide an annual report. The company has its own noise measuring equipment which allows a trained person to carry out a noise assessment where there is a potential area of concern. If there is a concern following the internal investigation the matter will be referred to the external noise consultant.

f) Monitoring and Control of Pest Infestations

Due to the nature of the work currently undertaken on this site no waste is produced that would attract pests, scavenging birds or scavengers to the site. The site utilises the services of a contracted, professional pest control specialist (Vergo UK). The company is engaged to perform scheduled inspections and monitoring to prevent activity and provide immediate treatment if any evidence of pests, scavenging birds, or other scavengers is detected. All scheduled visits are recorded and held on site for review.

g) Monitoring and Control of Litter

Due to the nature of the work currently undertaken on this site the generation of litter is not expected.

The yard is swept on a daily basis at the end of each working day to ensure that any unaccounted-for litter is removed from the site.

h. Fire Action Plan

Accident and emergency plans have been prepared for the site, and a fire actions plan is presented in (App 2). Additionally, a copy shall be held in the site office and available for inspection. This plan covers possible emergencies and requires actions.

In the event of a fire at the site, the alarm shall be raised and site operatives evacuated to the fire assembly point.

Emergency procedures are also in place for events like power failure, gas explosions, traffic accidents, machinery failure, spillages and leaks. Site operatives will be familiar with the procedures and their responsibilities in the event of an emergency.

All incidents and accidents are to be reported in the site diary and accident report book.

1. Further Site Information

Site Plan (App 1 Drawing B) shows the locations of the main access points A1 to A4, along with the various stockpiles numbered 1 to 29; liquid storage tanks; compressed gas and volatile liquid storage.

The attached Site Data (App 2) for Clearway Belfast 2025, provides details of the stockpiles and equipment available for moving materials and equipment in case of a fire.

4.1 Fire Precautions

Several fire precautions are carried out across site. These include:

- Monthly fire safety audits.
- Weekly site inspections incorporating fire safety inspections.
- No smoking policy in place on site and a designated smoking area has been allocated in main carpark.
- Yearly service of all fire extinguishers.
- Yearly hydrant pressure checks completed.
- More than 20 trained fire marshals on site

4.2 Fire Equipment

There are several different variants of fire equipment strategically placed around the site to help control a fire, these include:

- Fire extinguishers (foam, dry powder, CO2, lithium-ion) – total of 75 across site.
- Fire hydrants – total of 10 across site.
- Mobile 1000-litre IBC with high pressure pump function.

On site plan drawing B, the fire hydrants are indicated H

The fire packs (extinguishers/hose reels) are indicated F

4.3 Site Drainage

The attached Site Drainage Plan (App1 Drawing C) shows the four site drainage layouts, including the locations of the interceptors and discharge points.

This plan shall be reviewed annually and updated where necessary.

Appendix 2

Fire Action Plan

Scope

- In the event of a fire this the procedure for evacuating all facilities of Clearway Disposals and report to required authorities and company personnel.

Responsibilities

- The Operations Manager and the Commercial Manager are responsible for the implementation of this procedure.
- The Operations Manager and the Commercial Manager are responsible for ensuring that operatives on the site are trained (& training documented) on this procedure.
- The Operations and Commercial Manager are responsible for ensuring that the trained operatives adhere to this procedure at all times.

Method

On discovering a fire, you must:

1. Sound the fire alarm.
2. Evacuate the premises/work area, do not stop to collect personal belongings.
3. Assemble in the nominated Fire Assembly Point (RV1 or RV2)
4. Ensure that fire wardens have noted your name and are aware that you have reported to the assembly point.
5. Await further instructions from your manager or supervisor.

Personnel on site
Weekdays: 62 persons including 5 lorry drivers
Weekends: 10-20 persons

Do not under any circumstances re-enter the site unless instructed to so by the person in charge of the situation.

You should only attempt to tackle a Fire under the following circumstances:

1. Your life is in danger, and your exit is blocked by the fire.
2. If it is only a small fire such as a piece of electrical equipment, and you are trained to use fire extinguishers, then you may attempt to control the fire using the correct extinguisher.

Remember if in doubt do not try to tackle the fire, SOUND THE ALARM and EVACUATE the site.

SAFETY ALWAYS COMES FIRST

Contacts in the case of a Fire / Emergency Evacuation at Clearway, Belfast, East Twin Road, Belfast BT3 9EN

Contact	Number	Contact Names	Email Address	Who should make contact?
PSNI Fire Ambulance	999	N/A	N/A	Whoever notices the emergency first, and/or Operations/Commercial Manager
Harbour Police	028 9055 3000	Duty Sergeant	N/A	As above
NIEA	[redacted] [redacted] 0800 807 060	[redacted] [redacted] Out of Hours	[redacted]@daera-ni.gov.uk [redacted]@daera-ni.gov.uk emergency-pollution@daera-ni.gov.uk	As above or [redacted]
Belfast Harbour Commissioners	[redacted] Via Harbour Police	[redacted] Duty Compliance Officer	[redacted]@belfast-harbour.co.uk safety@belfast-harbour.co.uk	As above or [redacted]
Clearway Disposals Ltd	[redacted]	[redacted] Commercial Manager	[redacted]@clearway-group.co.uk	Whoever notices the emergency first and/or Operations/ Commercial Manager
Clearway Disposals Ltd	[redacted]	[redacted] Operations Manager	[redacted]@clearway-group.co.uk	As above

Clearway Disposals Ltd	[redacted]	[redacted] Owner	[redacted]@ clearway-group.co.uk	As above
Clearway Disposals Ltd	[redacted]	[redacted] Owner	[redacted]@ clearway-group.co.uk	As above
Clearway Disposals Ltd	[redacted]	[redacted] Managing Director	[redacted]@ clearway-group.co.uk	As above

Appendix 3

Site Data: Clearway Belfast 2025 Stockpile

No.	Description	Max Tonnes	Risk 0-5	Burn Time
1	Steel Swarf	300	2	1 day
2	Frag Feed (ELV)	3000	3	2 to 3 days
3	Frag Feed	3000	3	1 day
5	Light Shredder Residue	500	3	1 day
6	Non-Ferrous from ECS	50	0	N/A
7	No. 1	3000	0	N/A
8	Steel Plate	2000	0	N/A
9	ECS Residue	3000	2	2 to 3 days
10	ECS Heavy Fines Residue	300	0	N/A
11	Shredded Steel	5000	0	N/A
12	Zorba	200	0	N/A
13	Unprocessed ELVs	150	4	3 to 4 hours
14	Off-loaded material	100	3	3 to 4 hours
16	Area for new PST plant.	N/A	0	N/A
17		N/A	0	N/A
18	Dock Bottom	8000	0	N/A
19	Oversize for shearing	2000	0	N/A
20	Sheared Ferrous	1500	0	N/A
21	PST Residues	100	1	1 to 4 hours
22	Shredded Steel	500	0	N/A
23	Mixed Shredder Residue	200	3	1 day
24	ECS Residue 0-30 mm	9000	2	2 to 3 days
25	ECS Residue 30-100 mm	20	2	3 to 4 hours
26	ECS Residue 20- 100 mm	20	2	3 to 4 hours
27	ECS Residue 30-100 mm	20	2	3 to 4 hours
28	Non-Ferrous (Aluminium)	100	0	N/A
29	Non-Ferrous	100	0	N/A

Refer to App1_Drw B

Materials Handling Machinery for Use in Case of Fire

Material can be moved using Liebherr/ Sennebogen mobile cranes (materials handlers) (360-degree excavator type) fitted with hydraulic grabs.

The Liebherr machines comprise 3 x Liebherr's 954s and one 934 on tracks: 1 x LH40s on wheels and 1 x LH60 on wheels.

The Sennebogen machines are 2 x 835s and 1 x 870.

The Fuchs-Terex machine is a 1 x 360s.There are 4 shunter trucks, and 4 articulated trucks for transporting material.

For smaller scale material movement, there is also a number of loading shovels, telescopic handlers.

Forklifts with capacity 2.5 to 10-tonnes are available for equipment unloading or movement.

l *Safety and Emergency Procedures*

- All activities shall be carried out in such a manner as to prevent fire and pollution incidents.
- See sections *b)* and *h)* above

2. Site Records

a) Provision of a Site Diary

A digital site diary will be kept and maintained by the site manager. Any important information regarding site activities will be recorded in it. In the absence of the site manager the Managing Director will perform this task, the H&S Officer & Environ Manager may also access the diary if required.

b) Security and availability of records

All records are kept securely and backed up on Cloud storage and are available for inspection.

c) Records of waste movements

Records of waste movements into and out of the site will be kept on company computer system. Hard copies of external documents are filed in the office. All records are available for inspection.

Financial Provision for SITE NAME and Authorisation Number				
Waste stream	**Quantity**	**Unit**	**Disposal Cost per unit**	**Total disposal cost**
Unprocessed		tonnes		£0.00
Paper		tonnes		£0.00
Cardboard		tonnes		£0.00
Plastic		tonnes		£0.00
Wood		tonnes		£0.00
Metal		tonnes		£0.00
Glass		tonnes		£0.00
Rubble		tonnes		£0.00
Inert Fines		tonnes		£0.00
Residual		tonnes		£0.00
Refrigeration Equipmenrt		Units		£0.00
Batteries		m^3		£0.00
WEEE		m^3		£0.00
Gas bottles		m^3		£0.00
Tyres		m^3		£0.00
Other		m^3		£0.00
Total disposal costs				**£0.00**
Site Remediation Costs				
Cleaning site surfaces		m^2		£0.00
Cleaning site drains		m^2 / litre		£0.00
Emptying / cleaning interceptors		tonnes/ litres		£0.00
Other remediation		m^2 / tonnes		£0.00
Total remediaton costs				**£0.00**
Total Financial Provision Required for this site				£0.00

Declaration

By signing this calculation, I confirm AS THE AUTHORISATION HOLDER or AS THE PERSON ACTING ON BEHALF OF THE AUTHORISATION HOLDER (DELETE AS APPROPIATE) that the total financial provision figure produced for this site, is correct. I confirm the total sum stated will address the clearance, cleaning and where required restoration and remediation of the site, based on full capacity, as permitted by the waste authorisation / working plan.

PRINTED NAME:_____

Date: _____

Financial Provision for Clearway Disposals Ltd P0483/15A & LN/21/14/V2				
Waste stream	**Quantity**	**Unit**	**Disposal Cost per unit**	**Total disposal cost**
Undepolluted ELVs	150	Vehicles	0	£0.00
Depolluted ELVs	3000	Vehicles	0	£0.00
Ferrous Metal	30000	tonnes	0	£0.00
Non Ferrous Metal	11000	tonnes	0	£0.00
Residual Wastes produced as a result of the depollution of ELVs				
Fuel Oil - Petrol	2000	litres	[redacted]	
Fuel Oil - Diesel	2000	litres		
Fuel Oil - Dirty	2000	litres		
Coolant	2200	litres		
Brake Fluid	1000	litres		
Antifreeze	2200	litres		
Engine/ Transmission / Hydraulic Oils	5000	litres		
Oil and Air Filters	1	tonnes		
Oily Rags	0.25	tonnes		
Spent Oil absorbants	1	tonnes		
Aerosols	0.25	tonnes		
Batteries	50	tonnes		
Tyres	500	tyres		
Metal	50	tonnes		
Other residual	500	tonnes		
Total disposal costs				
Site Remediation Costs				
Cleaning site surfaces		m^2		
Cleaning site drains		m^2 / litre		
Emptying / cleaning interceptors		tonnes/ litres		
Other remediation		m^2 / tonnes		
Total remediaton costs				
Total Financial Provision Required for this site				[redacted]

Declaration

By signing this calculation, I confirm AS THE PERSON ACTING ON BEHALF OF THE AUTHORISATION HOLDER that the total financial provision figure produced for this site, is correct. I confirm the total sum stated will address the clearance, cleaning and where required restoration and remediation of the site, based on full capacity, as permitted by the waste authorisation / working plan.

PRINTED NAME: [redacted]

Date: 21/01/2026

Financial Provision for SITE NAME and Authorisation Number				
Waste stream[1]	**Quantity**	**Unit**	**Disposal Cost per unit**	**Total disposal cost**
Slurry Storage		m^3		£0.00
Reception sump		m^3		£0.00
Other Waste feedstocks (food waste, edible oils and fats etc.)		m^3		£0.00
Primary Digester		m^3		£0.00
Secondary Digester		m^3		£0.00
Digestate End Store		m^3		£0.00
Separated digestate liquid fraction		m^3		£0.00
Separated digestate solid fraction		tonnes		£0.00
On-site chemicals		tonnes		£0.00
General waste		tonnes		£0.00
Total disposal costs				**£0.00**
Site Remediation Costs				
Cleaning site surfaces		m^2		£0.00
Cleaning site drains		m^2 / litre		£0.00
Emptying / cleaning interceptors		tonnes/ litres		£0.00
Other remediation		m^2 / tonnes		£0.00
Total remediaton costs				**£0.00**
Total Financial Provision Required for this site				£0.00

[1] additional lines can be added or removed as required

Declaration

By signing this calculation, I confirm AS THE AUTHORISATION HOLDER or AS THE PERSON ACTING ON BEHALF OF THE AUTHORISATION HOLDER (DELETE AS APPROPIATE) that the total financial provision figure produced for this site, is correct. I confirm the total sum stated will address the clearance, cleaning and where required restoration and remediation of the site, based on full capacity, as permitted by the waste authorisation / working plan.

PRINTED NAME:_____

Date: _____

Financial Provision for SITE NAME and Authorisation Number				
Waste stream[1]	**Quantity**	**Unit**	**Disposal Cost per unit**	**Total disposal cost**
General waste		tonnes		£0.00
Total disposal costs				**£0.00**
Site Remediation Costs				
Cleaning site surfaces		m^2		£0.00
Cleaning site drains		m^2 / litre		£0.00
Emptying / cleaning interceptors		tonnes/ litres		£0.00
Other remediation		m^2 / tonnes		£0.00
Total remediaton costs				**£0.00**
Total Financial Provision Required for this site				£0.00

[1] additional lines can be added or removed as required

Declaration

By signing this calculation, I confirm AS THE AUTHORISATION HOLDER or AS THE PERSON ACTING ON BEHALF OF THE AUTHORISATION HOLDER (DELETE AS APPROPIATE) that the total financial provision figure produced for this site, is correct. I confirm the total sum stated will address the clearance, cleaning and where required restoration and remediation of the site, based on full capacity, as permitted by the waste authorisation / working plan.

PRINTED NAME:_____

Date: _____

[redacted]

From: [redacted]
Sent: 25 February 2026 08:38
To: [redacted]
Cc: [redacted]
Subject: RE: CM: Outstanding FP and Annual Monitoring Report
Attachments: AE1 26 471768 Cover letter for enforcement notice 16 02 26.pdf; Annual Report Enforcement Notice (16 03 26.pdf; Clearway WP Tables Revised.docx

Importance: High

[redacted]

Further to my e-mail below, please find attached the Regulation 27 Enforcement Notice requiring you to submit the Annual Environmental Monitoring report for the period 1 January 2025 to 31 December 2025 for P0483/15A/V1- Clearway Belfast Metal Recycling Facility on or before 25 March 2026.

I have also reviewed the attached WP Tables Revised and the quantities in Tables 1 & 2 still do not match the Quantities on the FP Calculation. [redacted] would you be available tomorrow morning for a quick call, unfortunately I'm tied up all day today?

Many thanks

[redacted]
Waste Management Licensing

Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

An Agency within the Department of Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

An Agen Fair an' K

From: [redacted]
Sent: 17 February 2026 15:47
To: [redacted]@clearway-group.co.uk>; [redacted]@clearway-group.co.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: CM: Outstanding FP and Annual Monitoring Report
Importance: High

[redacted]

Further to my e-mail below, please see attached warning letters requesting the outstanding FP calculations for WML 31/20 and P0483/15A/V1 and the FP mechanism to cover P0483/15A/V1, WML 31/20, WML 30/11, WML 13/72 and WML 13/65/T. The current financial provision expires on 5 March 2026.

The Annual Environmental Monitoring report for the period 1 January 2025 to 31 December 2025 for P0483/15A/V1- Clearway Belfast Metal Recycling Facility is also outstanding and was due on 31 January 2026. This was extended until 13 February 2026 but remains outstanding. A Regulation 27 Enforcement Notice has been prepared under the Pollution Prevention and Control (Industrial Emissions) Regulations

(Northern Ireland) 2013 for approval and signature by the Chief Inspector and will be issued in the next day or two. Please submit the Annual Environmental Monitoring Report on or before 13 March 2026.

Should you require any clarification regarding this e-mail, please do not hesitate to contact me.

Many thanks

[redacted]
Waste Management Licensing

NIEA Northern Ireland Environment Agency
www.daera-ni.gov.uk Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency

An Agency within the Department of Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

An Agen Fairi an' K

From: [redacted]
Sent: 16 February 2026 14:05
To: [redacted]@clearway-group.co.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: FW: FP Jan 2026 _ Clearway Belfast _ WML 31/20

[redacted]

Apologies for the delay in getting back to you. I have reviewed the amendments to the Working Plan (WP), and I still cannot reconcile the FP calculation with the Tables in the Working Plan, broken down as follows.

	Scrap Fe and Non-Fe (Tonnes)	ELV (Tonnes)	Residuals (Tonnes)	Total (Tonnes)
Table 1 of WP & Summary	[redacted]	[redacted]	[redacted]	[redacted]
Table 2 of WP	[redacted]	[redacted]	[redacted]	[redacted]
FP Calculation	[redacted]	[redacted]	[redacted]	[redacted]

Table 2 details Plastics and Glass, these have been omitted from the FP calculation and need to be added The FP calculation details the residuals produced as a result of depollution (below for reference), these should be detailed in table two

Residual Wastes produced as a result of the depollution of ELVs
Fuel Oil - Petrol
Fuel Oil - Diesel
Fuel Oil - Dirty
Coolant
Brake Fluid
Antifreeze
Engine/ Transmission / Hydraulic Oils
Oil and Air Filters
Oily Rags
Spent Oil absorbents
Aerosols
Batteries
Tyres

Metal
Other residual

Appreciate if you can review and make the required amendments please.

Thanks

[redacted]
Waste Management Licensing

Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

An Agency within the Department of Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

An Ager Fairr an' F

From: [redacted]@clearway-group.co.uk>
Sent: 30 January 2026 17:16
To: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Cc: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>
Subject: Re: FP Jan 2026 _ Clearway Belfast _ WML 31/20

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

[redacted]

I trust this finds you both well. Thank you for your comments regarding Section 1(b), the Site Data / stockpiles information and the Financial Provision (FP).

We have now amended the documentation to address the points raised and to ensure alignment between the Working Plan and the FP.

Section 1(b) has been retained as the primary EWC control table.

A derived material summary has been added to group EWC codes into ferrous, non-ferrous, ELVs and residual wastes for ease of reference.

A new "Maximum Permitted Storage Capacities" table has been added to define the maximum quantities.

The FP has been revised so that quantities match the Maximum Permitted Storage Capacities table.

Any reference to the Fire Action Plan's burn times etc "*App 3*" should have been removed prior to the response being sent. That was a miscommunication on my part. I apologise for the unnecessary uncertainty caused.

I have attached a recent copy of an invoice from [redacted] The tyre disposal rate is an agreement of [redacted] per tonne. Our per unit cost within the FP allows for this.

We trust this addresses the inconsistencies previously identified. Please let us know if any further clarification is required. Have a great weekend.

Aye,

[redacted]

From: [redacted]@daera-ni.gov.uk>
Sent: Wednesday, January 21, 2026 12:00
To: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>
Cc: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>
Subject: RE: FP Jan 2026 _ Clearway Belfast _ WML 31/20

[redacted]

[redacted] is off today so I am responding to your e-mail and to the one you sent me on Monday with the updated Working Plan.

I am content that the changes I requested in Point 1 and 2 of the attached e-mail have been addressed i.e. Waste description have been attached to the EWC Codes in Section 1(b) and the Fire contacts have been updated. The maximum storage capacities detailed on Section 1(b) are however still different from those detailed in the Site Data / stockpiles section and both are different from those detailed on the attached Financial Provision (FP) calculation.

I think the easiest way to rectify this would be to add an additional summary table to the end of Section 1 (b) which combines the individual waste codes into the broader waste type headings such as Depolluted ELVs, Undepolluted ELVs, Ferrous Metal, Non-Ferrous Metal, Ferrous filings and turnings, non-ferrous filings and turnings, glass, plastic, shredder waste, batteries, WEEE etc . The table should be titled "Maximum Permitted Storage Capacities" and the combined quantities must accurately reflect the maximum proposed quantity for each waste type to be stored on the site, the quantities detailed on the FP calculation must then match this.

Appreciate if you could also clarify what Appendix 3 relates to as we were unsure and thought it may be part of the Fire Action Plan as it contains burn times and risk ratings. Appreciate if you could also clarify why these quantities differ from Section 1(b).

Can you also confirm the figure of [redacted] per tyre as typically the cost for disposal of tyres is around [redacted] please? I am content with all other unit costs.

This information should be provided on or before 30 January 2025. Should you require any clarification regarding this e-mail, please do not hesitate to contact me.

Many thanks

[redacted]

Waste Management Licensing

From: [redacted]@clearway-group.co.uk>
Sent: 21 January 2026 10:48
To: [redacted]@daera-ni.gov.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@clearway-group.co.uk>
Subject: FP Jan 2026 _ Clearway Belfast _ WML 31/20

Dear [redacted]

We trust this finds you well.

As part of our annual evaluations, we are currently reviewing the Financial Provision (FP) for our East Twin Road site. We are writing to propose an adjustment to our bond and would greatly value your advice and feedback on our intended approach.

To more accurately reflect our evolving operational profile, specifically the growth in the volume of End-of-Life Vehicles (ELVs) and associated materials, we are seeking to increase our provision.

While our routine site management and physical capacity are typically capped at 42,500 T (as detailed in the attached Appendix 3: Site Data), our site's working plan (Section 1b, p.4) allows for a theoretical maximum of approximately 45,000 T to provide flexibility across EWC codes. We propose that the FP calculation be based on this upper threshold of 45,000 T.

We are eager to ensure this alignment meets your expectations and would welcome your guidance on whether this proposal is acceptable to the Department. We remain available to discuss any adjustments you may deem necessary.

Thank you for your time and assistance in this matter.

Yours sincerely,

Clearway Metal Recycling

Hammond Lane Metal Company
Part of the Clearway Group

Tel: 02890 457556 Ext 227 | [redacted]@clearway-group.co.uk

P0483/15A/V1 - WPPC 07/10

[redacted]
Clearway Disposals Ltd,
41 Dobbins Road
Portadown
BT62 4EY

17 Antrim Road,
Tonagh
Lisburn,
Co. Antrim.
BT28 2AL
Telephone: 028 9056 9800
Email: [redacted]@daera-ni.gov.uk

25 February 2026

[redacted]

POLLUTION PREVENTION AND CONTROL (INDUSTRIAL EMISSIONS) REGULATIONS (NI) 2013

ENFORCEMENT NOTICE: P0483/15A/V1 Clearway Disposal Limited, Clearway Belfast Scrap Metal Facility, East Twin Road, Belfast Harbour Estate, Belfast BT3 9EN.

We wrote to you on **2 December 2025** to advise you that your Annual Environmental Monitoring Report must be submitted to the Department for approval no later than **31 January 2026**. This was followed up by an e-mail on **03 February 2026** advising that the report remained outstanding and must now be received on or before **13 February 2026.**

To date we have not received your Annual Environmental Monitoring Report for the site.

Please find enclosed an Enforcement Notice requiring you to submit to the Department your Annual Environmental Monitoring Report. This Enforcement Notice is issued on behalf of the Chief Inspector under the above Regulations.

Under Regulation 31 (2) of the above Regulations, you have the right of appeal against an Enforcement Notice, which must be lodged with The Planning Appeals Commission within 2 months of the date of this Notice. It should be noted however, that under Regulation 31(8), the bringing of an appeal does not have the effect of suspending the operation of the Notice.

Should you have any queries please do not hesitate to contact [redacted]

[redacted]@daera-ni.gov.uk

Yours faithfully/sincerely,

[redacted]

[redacted]

NIEA Waste Regulation Unit

Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

CHIEF INDUSTRIAL POLLUTION INSPECTOR
POLLUTION PREVENTION AND CONTROL (INDUSTRIAL EMISSIONS) REGULATIONS (NI) 2013

ENFORCEMENT NOTICE

Serial No **P0483/15A/V1**

Name **Clearway Disposals Limited, Clearway Belfast Scrap Metal Facility.**

Address **East Twin Road, Belfast Harbour Estate, Belfast. BT3 9EN**

I, [redacted] being an Inspector appointed by an instrument in writing made pursuant to Regulation 8 (1) of the Pollution Prevention and Control (Industrial Emissions) Regulations (NI) 2013 (the 2013 Regulations) and empowered to serve this notice on behalf of the Chief Inspector hereby give you notice that I am of the opinion that as a person operating an installation or mobile plant for which a permit has been granted at **Clearway Belfast Scrap Metal Facility. East Twin Road, Belfast Harbour Estate, Belfast. BT3 9EN** under permit number **P0483/15A/V1** under the 2013 Regulations you are contravening the following conditions of that permit:

Condition 5.2 **A report or reports on the performance of the Activities over the previous year shall be submitted to the Chief Inspector by 31 January (or other date agreed on writing by the Chief Inspector) each year**

The matters constituting the contravention or making it likely that the contravention will arise are specified in the attached Schedule which forms part of this Notice, and I hereby require you to remedy the said contraventions or, as the case may be, the matters likely to give rise to the contraventions by taking the steps specified in the said Schedule. Failure to comply with the requirements imposed by the notice issued under Regulation 27 of the Pollution Prevention and Control (Industrial Emissions) Regulations (Northern Ireland) 2013 will result in the Department taking enforcement proceedings for the purpose of securing compliance with those requirements.

Signature [redacted] Date: 24th February 2026

Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

[redacted]

NIEA Waste Regulation Unit

17 Antrim Road, Tonagh, Lisburn, Co. Antrim, BT28 2AL

Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

CHIEF INDUSTRIAL POLLUTION INSPECTOR

THE POLLUTION PREVENTION AND CONTROL (INDUSTRIAL EMISSIONS) REGULATIONS (NORTHERN IRELAND) 2013

Schedule attached to Enforcement Notice

Serial No. P0483/15A/V1

Permit Condition	Matters constituting the contravention or making it likely that contravention will arise	Steps to be taken to remedy the said contravention or to remedy matters likely to give rise to said contravention	Steps to be taken within period ending (end date)
Condition 5.2	NIEA Waste Regulation Unit wrote to Clearway Disposal Limited on **2 December 2025** to advise that the Annual Environmental Monitoring Report must be submitted to the Department for approval no later than **31 January 2026** in accordance with Condition 5.2 of you IPPC Permit P0483/15A/V1. This was followed up by an e-mail on **03 February 2026** advising that the report remained outstanding and must now be received on or before **13 February 2026.** To date the Annual Environmental Monitoring Report has not been received	Submit the Annual Environmental Monitoring Report for the year commencing 1 January 2025 for approval by the Department	On or before 25 March 2026

Table 01 WP – Revised

LoW Code	Description	Max Stock (t)
02 01 10	Waste metal (Agri/Horti/Forestry)	25
10 03 16	Aluminium skimming	10
11 05 01	Hard zinc	25
11 05 02	Zinc ash	10
12 01 01	Ferrous metal filings and turnings	700
12 01 02	Ferrous metal dust and particles	10
12 01 03	Non-ferrous metal filings and turnings	25
12 01 13	Welding wastes	2
12 01 99	Metal machining wastes (NOS)	2,000
15 01 04	Metallic packaging	20
16 01 03	End-of-life tyres	5
16 01 04*	End-of-life vehicles (Polluted)	150
16 01 06	End-of-life vehicles (Depolluted)	3,000
16 01 12	Brake pads	2
16 01 16	Tanks for liquefied gas	2
16 01 17	Ferrous metal (from ELV)	100
16 01 18	Non-ferrous metal (from ELV)	200
16 01 19	Plastic	5
16 01 20	Glass	5
16 01 21*	Hazardous components (other)	20
16 01 22	Components not otherwise specified	5
16 01 99	ELV components (NOS)	5
16 02 14	Discarded equipment (non-hazardous)	10
16 02 16	Components from discarded equipment	5
16 06 01*	Lead batteries	50
16 08 01	Spent catalysts (precious metals)	2
17 04 01	Copper, bronze, brass	50
17 04 02	Aluminium	3
17 04 03	Lead	30
17 04 04	Zinc	5
17 04 05	Iron and steel (Construction)	3,000
17 04 06	Tin	2
17 04 07	Mixed metals	1
17 04 11	Cables	5
19 01 02	Ferrous materials from bottom ash	3
19 10 01	Iron and steel waste (Shredder)	3,750
19 10 02	Non-ferrous waste (Shredder)	150
19 10 04	Fluff-light fraction and dust	500
19 10 05*	Other fractions (hazardous)	25
19 10 06	Heavy Shredder Residue	9,000
19 12 02	Ferrous metal (Mechanical treatment)	3,500
19 12 03	Non-ferrous metal (Mechanical treatment)	75
19 12 12	Other wastes (Mechanical treatment)	8,000

20 01 34	Batteries (non-hazardous)	2
20 01 36	WEEE (non-hazardous)	25
20 01 40	Metals (Municipal waste)	50

Ferrous	21,226
Non-Ferrous	9,678
ELV	3,150
Waste	516
Total	**34,570**

Table 02 WP – Maximum Permitted Storage Capacities - Revised

Waste Type	Max Permitted Storage (t)
End-of-Life Vehicles (ELVs)	150
Depolluted ELVs	3,000
Ferrous Metals	10,413
Ferrous Metal Filings/Turnings	700
Non-Ferrous Metals	611
Non-Ferrous Metal Filings/Turnings	25
Shredder Residue / Fluff / Light	500
Heavy Shredder Residue (Other)	9,000
Plastics	5
Glass	5
End-of-Life Tyres	5
Batteries (lead and non-lead)	52
Waste Electrical & Electronic (WEEE)	35
Hazardous ELV Components	20
Bulk Machining/Treatment Waste	10,000
Minor Components/Misc	50
Fuel Oil - Petrol	1.5
Fuel Oil - Diesel	1.5
Fuel Oil - Dirty	1.5
Coolant	2.2
Brake Fluid	1.1
Antifreeze	2.2
Engine/ Transmission / Hydraulic Oils	4
Oil and Air Filters	1
Oily Rags	0.25
Spent Oil absorbents	1
Aerosols	0.25
Total	**34,588**

FP Table for review

Financial Provision for Clearway Disposals Ltd P0483/15A & LN/21/14/V2				
Waste stream	**Qty**	**Unit**	**Disposal Cost / unit**	**Total disposal cost**
Undepolluted ELVs	150	Vehicles	0	£0.00
Depolluted ELVs	3000	Vehicles	0	£0.00
Ferrous Metal	21,113	tonnes	0	£0.00
Non-Ferrous Metal	9,636	tonnes	0	£0.00
Residual Wastes produced as a result of the depollution of ELVs				
Fuel Oil - Petrol	2000	litres		
Fuel Oil - Diesel	2000	litres		
Fuel Oil - Dirty	2000	litres		
Coolant	2200	litres		
Brake Fluid	1000	litres		
Antifreeze	2200	litres		
Engine/ Transmission / Hydraulic Oils	5000	litres		
Oil and Air Filters	1	tonnes		
Oily Rags	0.25	tonnes		
Spent Oil absorbents	1	tonnes		
Aerosols	0.25	tonnes		
Batteries	52	tonnes		
Tyres	500	units		
Glass	5	tonnes		
Plastic	5	tonnes		
Metal	70	tonnes		
Other residual	535	tonnes		
Total disposal costs				
Site Remediation Costs				
Cleaning site surfaces		m^2		
Cleaning site drains		m^2 / litre		
Emptying / cleaning interceptors		tonnes/ litres		
Other remediation		m^2 / tonnes		
Total remediation costs				
Total Financial Provision Required for this site				

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Further to my e-mail below, please find attached the Regulation 27 Enforcement Notice requiring you to submit the Annual Environmental Monitoring report for the period 1 January 2025 to 31 December 2025 for P0483/15A/V1- Clearway Belfast Metal Recycling Facility on or before 25 March 2026.

I have also reviewed the attached WP Tables Revised and the quantities in Tables 1 & 2 still do not match the Quantities on the FP Calculation. [redacted] would you be available tomorrow morning for a quick call, unfortunately I'm tied up all day today?

Many thanks

[redacted]
Waste Management Licensing

[redacted]

Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

An Agency within the Department of Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

An Agen Fairr an' K

From: [redacted]
Sent: 17 February 2026 15:47
To: [redacted]@clearway-group.co.uk>; [redacted]@clearway-group.co.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: CM: Outstanding FP and Annual Monitoring Report
Importance: High

[redacted]

Further to my e-mail below, please see attached warning letters requesting the outstanding FP calculations for WML 31/20 and P0483/15A/V1 and the FP mechanism to cover P0483/15A/V1, WML 31/20, WML 30/11, WML 13/72 and WML 13/65/T. The current financial provision expires on 5 March 2026.

The Annual Environmental Monitoring report for the period 1 January 2025 to 31 December 2025 for P0483/15A/V1- Clearway Belfast Metal Recycling Facility is also outstanding and was due on 31 January 2026. This was extended until 13 February 2026 but remains outstanding. A Regulation 27 Enforcement Notice has been prepared under the Pollution Prevention and Control (Industrial Emissions) Regulations (Northern Ireland) 2013 for approval and signature by the Chief Inspector and will be issued in the next day or two. Please submit the Annual Environmental Monitoring Report on or before 13 March 2026.

Should you require any clarification regarding this e-mail, please do not hesitate to contact me.

Many thanks

[redacted]
Waste Management Licensing

Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

An Agency within the Department of Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

An Agen Fairr an' K

From: [redacted]
Sent: 16 February 2026 14:05
To: [redacted]@clearway-group.co.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: FW: FP Jan 2026 _ Clearway Belfast _ WML 31/20

[redacted]

Apologies for the delay in getting back to you. I have reviewed the amendments to the Working Plan (WP), and I still cannot reconcile the FP calculation with the Tables in the Working Plan, broken down as follows.

	Scrap Fe and Non-Fe (Tonnes)	ELV (Tonnes)	Residuals (Tonnes)	Total (Tonnes)
Table 1 of WP & Summary	[redacted]	[redacted]	[redacted]	[redacted]
Table 2 of WP	[redacted]	[redacted]	[redacted]	[redacted]
FP Calculation	[redacted]	[redacted]	[redacted]	[redacted]

Table 2 details Plastics and Glass, these have been omitted from the FP calculation and need to be added The FP calculation details the residuals produced as a result of depollution (below for reference), these should be detailed in table two

Residual Wastes produced as a result of the depollution of ELVs
Fuel Oil - Petrol
Fuel Oil - Diesel
Fuel Oil - Dirty
Coolant
Brake Fluid
Antifreeze
Engine/ Transmission / Hydraulic Oils
Oil and Air Filters
Oily Rags
Spent Oil absorbents
Aerosols
Batteries
Tyres
Metal
Other residual

Appreciate if you can review and make the required amendments please.

Thanks

[redacted]
Waste Management Licensing

NIEA Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

An Agency within the Department of Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

An Agen Fairi an' F

From: [redacted]@clearway-group.co.uk>
Sent: 30 January 2026 17:16
To: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Cc: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>
Subject: Re: FP Jan 2026 _ Clearway Belfast _ WML 31/20

[redacted]

I trust this finds you both well. Thank you for your comments regarding Section 1(b), the Site Data / stockpiles information and the Financial Provision (FP).

We have now amended the documentation to address the points raised and to ensure alignment between the Working Plan and the FP.

Section 1(b) has been retained as the primary EWC control table.

A derived material summary has been added to group EWC codes into ferrous, non-ferrous, ELVs and residual wastes for ease of reference.

A new “Maximum Permitted Storage Capacities” table has been added to define the maximum quantities.

The FP has been revised so that quantities match the Maximum Permitted Storage Capacities table.

Any reference to the Fire Action Plan’s burn times etc “*App 3*” should have been removed prior to the response being sent. That was a miscommunication on my part. I apologise for the unnecessary uncertainty caused.

I have attached a recent copy of an invoice from [redacted]. The tyre disposal rate is an agreement of [redacted] per tonne. Our per unit cost within the FP allows for this.

We trust this addresses the inconsistencies previously identified. Please let us know if any further clarification is required. Have a great weekend.

Aye,

[redacted]

From: [redacted]@daera-ni.gov.uk>
Sent: Wednesday, January 21, 2026 12:00
To: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>
Cc: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>
Subject: RE: FP Jan 2026 _ Clearway Belfast _ WML 31/20

[redacted]

[redacted] is off today so I am responding to your e-mail and to the one you sent me on Monday with the updated Working Plan.

I am content that the changes I requested in Point 1 and 2 of the attached e-mail have been addressed i.e. Waste description have been attached to the EWC Codes in Section 1(b) and the Fire contacts have been updated. The maximum storage capacities detailed on Section 1(b) are however still different from those detailed in the Site Data / stockpiles section and both are different from those detailed on the attached Financial Provision (FP) calculation.

I think the easiest way to rectify this would be to add an additional summary table to the end of Section 1 (b) which combines the individual waste codes into the broader waste type headings such as Depolluted ELVs, Undepolluted ELVs, Ferrous Metal, Non-Ferrous Metal, Ferrous filings and turnings, non-ferrous filings and turnings, glass, plastic, shredder waste, batteries, WEEE etc . The table should be titled

“Maximum Permitted Storage Capacities” and the combined quantities must accurately reflect the maximum proposed quantity for each waste type to be stored on the site, the quantities detailed on the FP calculation must then match this.

Appreciate if you could also clarify what Appendix 3 relates to as we were unsure and thought it may be part of the Fire Action Plan as it contains burn times and risk ratings. Appreciate if you could also clarify why these quantities differ from Section 1(b).

Can you also confirm the figure of [redacted] per tyre as typically the cost for disposal of tyres is around [redacted] please? I am content with all other unit costs.

This information should be provided on or before 30 January 2025. Should you require any clarification regarding this e-mail, please do not hesitate to contact me.

Many thanks

[redacted]

Waste Management Licensing

Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency
www.daera-ni.gov.uk

An Agency within the Department of
Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne
Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

From: [redacted]@clearway-group.co.uk>
Sent: 21 January 2026 10:48
To: [redacted]@daera-ni.gov.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@clearway-group.co.uk>
Subject: FP Jan 2026 _ Clearway Belfast _ WML 31/20

[redacted]

We trust this finds you well.

As part of our annual evaluations, we are currently reviewing the Financial Provision (FP) for our East Twin Road site. We are writing to propose an adjustment to our bond and would greatly value your advice and feedback on our intended approach.

To more accurately reflect our evolving operational profile, specifically the growth in the volume of End-of-Life Vehicles (ELVs) and associated materials, we are seeking to increase our provision.

While our routine site management and physical capacity are typically capped at 42,500 T (as detailed in the attached Appendix 3: Site Data), our site's working plan (Section 1b, p.4) allows for a theoretical maximum of approximately 45,000 T to provide flexibility across EWC codes. We propose that the FP calculation be based on this upper threshold of 45,000 T.

We are eager to ensure this alignment meets your expectations and would welcome your guidance on whether this proposal is acceptable to the Department. We remain available to discuss any adjustments you may deem necessary.

Thank you for your time and assistance in this matter.

Yours sincerely,

Clearway Metal Recycling

Hammond Lane Metal Company
Part of the Clearway Group

Tel: 02890 457556 Ext 227 | [redacted]@clearway-group.co.uk

Report P4003 Issue 1
2025 Annual Environmental Monitoring Report

Clearway Belfast Scrap Metal Facility
East Twin Road
Belfast

Client: Clearway Disposals Ltd

Issued: February 2026

MCL Consulting Ltd
Unit 5, Forty Eight North
Duncrue Street
Belfast
BT3 9BJ
028 9074 7766

CONTENTS

1.0 INTRODUCTION 1

1.1 Background 1
1.2 Scope and Objectives 1
1.3 Terms of Reference 1
1.4 Limitations of the Review 2

2.0 SITE CHARACTERISTICS 3

2.1 Site Location 3
2.2 Site Installation Details 4
2.3 Geology 5
2.4 Hydrology 6
2.5 Site Drainage and Hydrology 6
2.6 Environmentally Sensitive Areas 7
2.7 Current Site Operations 7

3.0 PERMIT CONDITIONS 10

3.1 Performance Parameters 10
3.2 Other Conditions 10
3.3 Surface Water Sampling 10

4.0 RESULTS AND DISCUSSION 12

4.1 Emissions to Water 12
4.2 Other Performance Parameters 13
4.3 Additional Information 13

5.0 CONCLUSIONS AND RECOMMENDATIONS 15

5.1 Emissions 15
5.2 Annual Production / Treatment Returns 15
5.3 Next Monitoring Report 15

APPENDICES

Appendix 1: Site Layout and Monitoring Locations
Appendix 2: Water Quality Analysis: Laboratory Reports
Appendix 3: Financial Provision: Clearway Belfast
Appendix 4: Certificate of Operator Competence: WAMITAB

Figures

Figure 1: Site Location
Figure 2: Aerial Photo of site
Figure 3: Nearby Environmentally Sensitive Areas
Figure 4: 2025 Suspended Solids

Tables

Table 1: Planning Authorisations
Table 2: Permitted Quantities of Waste
Table 3: Annual Waste Returns 2025
Table 4: Monitoring Frequency
Table 5: Discharge Locations and Type
Table 6: Permit and Laboratory References
Table 7: Surface Water Quality Results
Table 8: Summary of Surface Water Exceedances 3rd July 2025

GLOSSARY OF TERMS

DWS	**Drinking Water Standard**
EQS	**Environmental Quality Standard**
PPC	**Pollution Prevention and Control**

1.0 INTRODUCTION

1.1 Background

This report was undertaken by MCL Consulting Ltd on behalf of Clearway Disposals Ltd. This Annual Environmental Monitoring report (AER) presents a review of environmental monitoring undertaken at the PPC regulated Scrap Metal Facility at East Twin Road, Belfast Harbour Estate, BT3 9EN during 2025.

The site is operated by Clearway Disposals Ltd in accordance with PPC Permit Number P0483/15A/V1. The Scrap Metal processing and End-of-Life (ELV) Recovery Facility site came into operation in 1991 and accepts up to 330,000 tonnes, under Table S1.4 of the Permit.

This report presents the results from surface water monitoring undertaken at the site across 2025 and includes information of the energy and water used at the site as part of Annual reporting requirements.

1.2 Scope and Objectives

This report presents the findings of results obtained for the period January to December 2025 for surface water sampling carried out at the site. This included three monitoring rounds (3rd July, 12th November and 8th December 2025) analysed for the set of PPC Permit (Permit No: P0483/15A) testing parameters.

The objective of the AER is to present a summary and discussion of the environmental monitoring (surface water discharge, energy consumption, water consumption) undertaken in compliance with Section 5 of the site PPC Permit and present a discussion of the environmental monitoring results and their impact on the surrounding environment (if any), for the period of the 1st January 2025 to the 31st December 2025.

1.3 Terms of Reference

The site is currently also regulated under a Waste Management License (WML 07/19; LN/09/114/M); Annual Reporting is not a requirement of the WML.

Under the PPC Permit, the following Annual Reports were written in compliance with the Permit have been produced by MCL.

- *Report P3598, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2024 Annual Monitoring Report, Issued January 2025,*
- *Report P3191, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2023 Annual Monitoring Report, Issued January 2024,*
- *Report P2883, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2022 Annual Monitoring Report, Issued January 2023,*
- *Report P2582, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2021 Annual Monitoring Report, Issued February 2022,*
- *Report P2274, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2020 Annual Monitoring Report, Issued February 2021,*
- *Report P2065, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2019 Annual Monitoring Report, Issued 18th February 2020,*
- *Report P1842, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, Annual Monitoring Report 2018, Issued April 2019,*
- *Project No. P1587, Environmental monitoring Report, Clearway Belfast Scrap Metal Facility 2017-18 Annual Report, Issued July 2018.*

1.4 Limitations of the Review

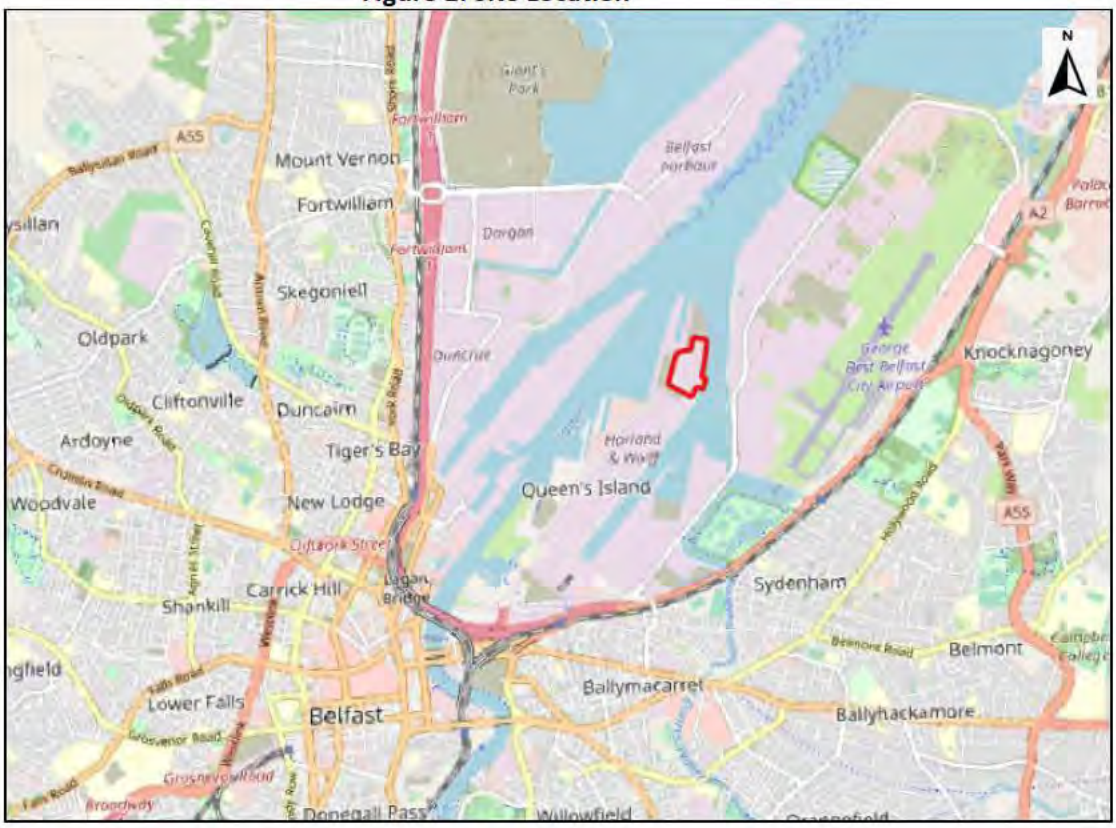
The report has been completed using the available environmental monitoring data which was collected at the site during the monitoring period (2025).

2.0 SITE CHARACTERISTICS

2.1 Site Location

The site is located between East Twin Road and Wolf Road in the Port of Belfast (IGR 336263, 376447) as shown in Figure 1 and Figure 2.

Figure 1: Site Location



Access to the site is from East Twin Road, at a single access point. The site is located in an industrial environment with no residential areas in the immediate vicinity. The site is located adjacent to Musgrave Channel as demonstrated in Figure 1.

Figure 2: Aerial Photo of site

2.2 Site Installation Details

The current regulated site covers an area of approximately 17 acres and accepts scrap metal and ELVs for treatment. The site layout and permitted boundary is shown in **Appendix 1.** The site is fenced from the road and neighbouring properties. The office block, canteen, toilets, and non-ferrous metal processing area are located near the site entrance. The former Farrans / Grahams building is used for maintenance, workshop, non-ferrous storage, aluminium dross and swarf baling.

The site operates at a maximum level of 330,000 tonnes per annum of ferrous and non-ferrous metals, and End of Life Vehicles (ELV's) per year.

2.2.1 Planning Authorisations

The site is/has been subject to the following planning authorisations listed in Table 1.

Table 1: Planning Authorisations

Application No.	Date Granted	Application Description
Z/2009/1378/F	1st June 2012	Change of use of existing single storey sheds for storage, processing, and recycling of non-hazardous, dry non-putrescible waste and for maintenance purposes.
Z/2006/1569/F	4th September 2008	Installation of a shredding machine with separation processes including magnetic separation, a trommel screener partly accommodated within new building, a picking station and erection of ancillary substation, for the processing of vehicles and scrap metal.
Z/2004/2857/F	4th September 2008	Steel Swarf Storage, End of life vehicle treatment building, battery storage facility, non-ferrous building extension, heavy metal silt trap.
Z/2001/0801/F	2nd October 2001	Erection of Industrial Warehouse on site used for the processing and storage of scrap metal

2.2.2 Site Engineering

The site is covered in a concrete impervious surface which prevents the downward movement of waste and leaching substances. The site drainage network provides drainage for the rainfall on site through a series of four interceptors. The surface water and interceptors are all discharged into the Musgrave Channel.

There are eight main storage tanks and five small waste tanks on site. Three large tanks are decommissioned. All tanks are within concrete or steel bunds and are above ground so can be routinely monitored.

2.3 Geology

Geological information on the site was obtained from review of the GSNI Special Engineering Geological Map for Belfast 1971 (Scale 1:21120) and GSNI GeoIndex.

The these show the site situated on Estuarine Alluvium; however, part of the site is shown as being open water and the current land area has been partly created by reclamation using fill material.

The Alluvium is estimated to be in excess of 10m thickness. Based upon published cross-sections the Estuarine Alluvium could be underlain by Boulder Clay with Glacial Sand and Gravel deposits also potentially present within the superficial sequence. The underlying bedrock is Sherwood Sandstone Group, which underlies the general central Belfast and harbour area.

2.4 Hydrology

The Made Ground, Estuarine Alluvium or Boulder Clay would not be considered as potential Superficial aquifers. Minor amounts of groundwater may be present in more sandy lenses. Where Sand and Gravel deposits are present, they would be expected to contain groundwater which could be in hydraulic connection with the adjacent Belfast Lough and therefore tidally influenced.

The Northern Ireland GSNI/NIEA aquifer classification reports the underlying Sherwood Sandstone as an aquifer with *high productivity, where groundwater moves by fracture/intergranular flow Bh(l-f).* In this locality in the Harbour, it would be expected that groundwater quality in the Sandstone would be affected by saline intrusion and would not be of a potable usable standard. There are no known groundwater abstractions within 250m of the site.

Dependent upon the exact geological sequence groundwater within the bedrock and deeper more permeable horizons may be within a confined aquifer setting, with these conditions being observed elsewhere in the Belfast area.

2.5 Site Drainage and Hydrology

The site is served by a long-standing piped drainage system which manages all surface water runoff for hardstanding areas. There are four main discharge points draining site waters to Belfast Lough along the site boundaries as shown in the site plan in Appendix 1.

The area around the site has been developed/redeveloped for a long period with local surface water drainage features draining to the Lough. There is no significant open surface watercourse in the local area.

2.6 Environmentally Sensitive Areas

The site is located immediately adjacent to Belfast Lough. The immediately adjacent waters are outside the designated Belfast Lough and Belfast Lough Open Special Protection Areas (SPA).

The site is located within 2km south of Inner Belfast Lough ASSI029, the Belfast Lough RAMSAR Site UK12002, Belfast Lough Open Water Special Protection Area (UK9020290) and the Belfast Lough SPA (UK9020101).

Figure 3: Nearby Environmentally Sensitive Areas

These designated areas will be sensitive receptors to any pollution or contamination that could come from the Clearway Disposal Ltd site operations. However, due to the continued monitoring of site operations and drainage networks, it is unlikely that the site will have any significant negative impact on the environmentally sensitive designations listed above.

2.7 Current Site Operations

The site operates at a maximum level of 330,000 tonnes per annum of ferrous and non-ferrous metals, and ELV's per year. The site storage limits for waste are detailed in Table 2.

Table 2: Permitted Quantities of Waste

Permitted Waste Categories	Maximum Permitted Quantities
Undepolluted end-of-life vehicles	Maximum number treated per week: 200 ELVs
	Maximum storage capacity: 40 ELVs
	Maximum storage time before depollution: 1 month
Depolluted end-of-life vehicles	Maximum weekly intake: 1500 ELVs
	Maximum storage capacity: 5000 ELVs
	Maximum storage time for depolluted ELVs: 6 months
Residual wastes produced as a result of depollution of end-of-life vehicles	
Fuel oils: Petrol	Maximum storage capacity: 2000 litres
Fuel oils: Diesel	Maximum storage capacity: 2000 litres
Coolant	Maximum storage capacity: 2000 litres
Engine/Transmission/Hydraulic oils	Maximum storage capacity: 2000 litres
Brake Fluid	Maximum storage capacity: 200 litres
Window wash	Maximum storage capacity: 2000 litres
Batteries	Maximum storage capacity: 500 batteries
Tyres	Maximum storage capacity:50 t
Plastics	Maximum storage capacity: 30 tonnes
Glass	Maximum storage capacity: 30 tonnes
Other residual wastes	Maximum storage capacity: 30 tonnes
Maximum Storage time after depollution: 1 year	
Non-ferrous metals	Maximum weekly intake: 400 tonnes
	Maximum storage capacity: 300 tonnes
	Maximum annual throughput: 15,000 tonnes
	Maximum storage time: 6 months
Ferrous metals	Maximum weekly intake: 8,000 tonnes
	Maximum storage capacity: 60,000 tonnes
	Maximum storage time: 6 months
Filings and turnings	Maximum weekly intake: 300 tonnes
	Maximum storage capacity: 100 tonnes

Within the Clearway Disposals Ltd East Twin Road site, waste is brought in and taken out of the site predominantly under the PPC Permit. However, acceptance, processing and transfer of waste also occurs within the site under a Waste Management License (WML 07/19, LN/09/114/M).

Waste intake and output tonnages are recorded in Table 3 overleaf. Table 3 differentiates between wastes accepted and processed under the PPC Permit from those regulated under the WML.

Table 3: Annual Waste Returns 2025

	Tonnage In			Tonnage Out		
EWC Code	Permit	Licence	All	Permit	Licence	All
120101	[redacted]					
120103						
120199						
130208						
130503						
150104						
160103						
160104						
160106						
160115						
160117						
160118						
160121						
160214						
160601						
170401						
170402						
170403						
170405						
170407						
191001						
191002						
191004						
191006						
191202						
191203						
200140						
Total Tonnage						

The total tonnage of metals received at the facility does not exceed the [redacted] limit set in the Permit. Activities at the site have remained broadly similar to previous years in terms of the types of waste accepted and processed.

3.0 PERMIT CONDITIONS

3.1 Performance Parameters

Schedule 5 of the PPC Permit details the reporting requirements for performance parameters. Water usage and Energy usage are monitored annually as specified within the Permit (Table 4). Quarterly waste returns were monitored and recorded in accordance with the Schedule 5 of the PPC permit conditions.

Table 4: Monitoring Frequency

Monitoring Parameter	Carried out Monitoring Frequency
Surface Water	Quarterly (12th November and 8th December) and Annual (3rd July).
Water Usage	Annually
Energy Usage	Annually
Waste Returns	Quarterly

3.2 Other Conditions

There are no emissions to air or land as specified by the Permit. All emissions from the activities on site shall be free from odour, noise and/or vibration in accordance with the conditions of the permit.

3.3 Surface Water Sampling

A map presenting the PPC (Permit No: P0483/15A) monitoring network for surface waters monitoring locations surrounding the site is presented in Appendix 1. There are four points sources shown on the plan together with four interceptors. The discharges are currently consented under the Water Order, with the 4No. location summarised in Table 5 below.

Table 5: Discharge Locations and Type

Point	Location	Interceptor	Type
SW1	J 36368, 76643	I1	Full retention 60,000 l
SW2	J 36339, 76413	I2	Full retention 60,000 l
SW3	J 36306, 76295	I4	Full retention 60,000 l
SW4	J 36306, 76295	I3	Unknown (old interceptor installed by Harbour Commissioners)

During this 2025 monitoring period 3No. sampling events took place: 3rd July, 12th November and 8th December.

The samples collected in July was analysed for Annual Parameters which are stated in Table S4.2 of the Permit.

- Metals Al, As, Ba, Cd Cr, Co, Cu, Fe, Pb, Ni, Mo, Hg, Sn, Vn, Zn.

The other samples collected were analysed for Suspended solids, pH and visible oil or grease.

All samples taken were submitted to [redacted] for testing using the appropriate suite of parameters as specified in the Permit. The laboratory results are included in Appendix 2. Permit and laboratory references for the 3no. site visits are summarised in in table 6.

Table 6: Permit and Laboratory References

Permit Ref	Laboratory Report reference		
	03/07/2025	12/11/2025	08/12/2025
SW1	[redacted]		
SW2			
SW3			
SW4			

4.0 RESULTS AND DISCUSSION

4.1 Emissions to Water

The results of the surface water monitoring are presented as laboratory reports in Appendix 2. The results were compared to the Limits set within the Permit and are summarised in Table 7:

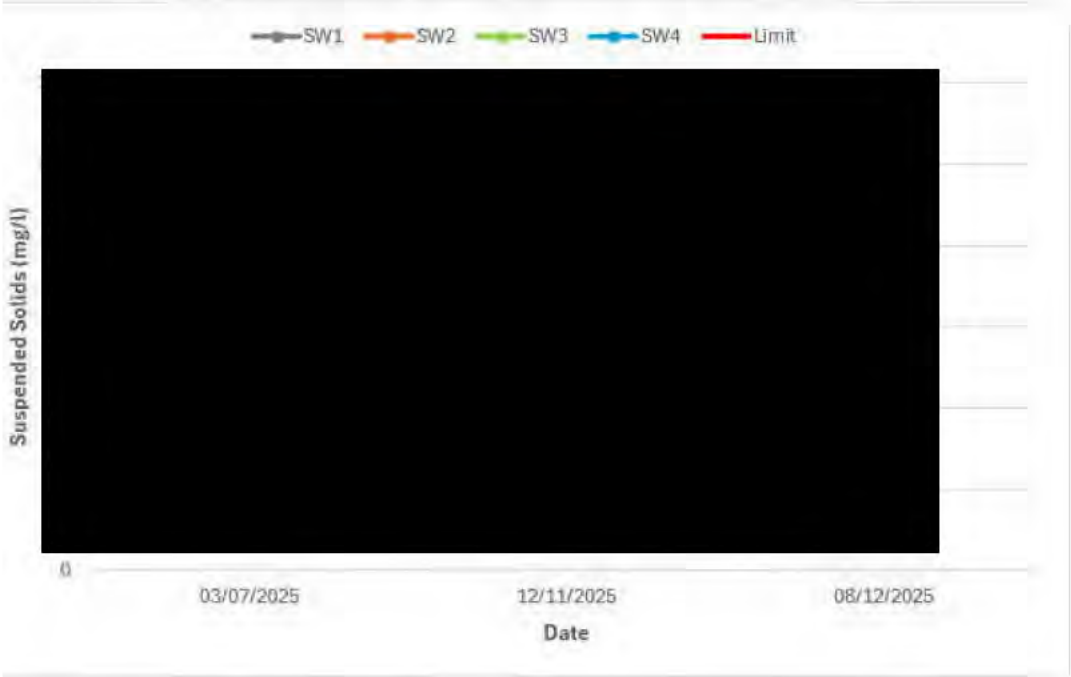
Table 7: Surface Water Quality Results

	Parameter	Limit	Sample Date		
			3rd July	12th November	8th December
SW1	Suspended Solids	[redacted]			
	pH				
	Visible Oil/Grease				
SW2	Suspended Solids				
	pH				
	Visible Oil/Grease				
SW3	Suspended Solids				
	pH				
	Visible Oil/Grease				
SW4	Suspended Solids				
	pH				
	Visible Oil/Grease				

4.1.1 Summary of Key Parameters

It is noted the Suspended Solids was exceeded in July at SW1, November at SW3 and SW4 and in December at SW3 and SW4. SW2 showed no exceedances throughout 2025.

Figure 4: Summary of Suspended Solids Results 2025



Where no Permit Limit is set for parameters, monitoring results (included in Appendix 2) are compared against relevant Environmental Quality Standards (EQS) or The Drinking Water Standards (DWS) where no EQS is available. A summary of exceedances during 2025 is detailed below.

Table 8: Summary of Surface Water Exceedances 7th July 2025

			Location			
Parameter	EQS	Units	SW1	SW2	SW3	SW4
Cadmium	0.08-0.25	ug/l	[redacted]			
Copper	1	ug/l				
Iron	1000	ug/l				
Lead	14	ug/l				
Nickel	4	ug/l				
Zinc	10.9	ug/l				

4.2 Other Performance Parameters

Annual potable water usage on site for the period of January to December 2025 is [redacted] last year.

Energy usage is required to be monitored annually on site. Electricity usage for 2025 was [redacted]. This is quite similar to the [redacted] reported in 2024.

Fuel Consumption for 2025 is detailed as follows;

- [redacted] of Diesel were consumed onsite in 2025.

4.3 Additional Information

4.3.1 Financial Provision Arrangements

Financial provision arrangements are in place in the form of an agreed Financial Provision Plan as detailed in Appendix 3.

4.3.2 Technically Competent Person

Formal training has been carried out by the landfill operator (WAMITAB) and the registration certificate is included as Appendix 4.

4.3.3 Other

There have been no reports of complaints received concerning nuisance and/or human health issues across 2025.

Three Schedule 6 Notifications were issued across 2025 with details summarised below;

- 3rd July – exceedance of suspended solids, sample point [redacted]
- 12th November – exceedance of suspended solids, sample point [redacted]
- 8th December – exceedance of suspended solids, sample point [redacted]

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 Emissions

Four exceedances of the Suspended Solids Permit Limit occurred in 2025. In July, Suspended Solids exceeded at [redacted] November Suspended Solids exceeded at [redacted] and [redacted] In December, Suspended Solids exceeded at [redacted]

There were multiple EQS exceedances throughout 2025 with exceedances noted for Cadmium, Copper, Iron, Lead, Nickel, and Zinc. However, these is no Permit Limit set for these parameters.

5.2 Annual Production / Treatment Returns

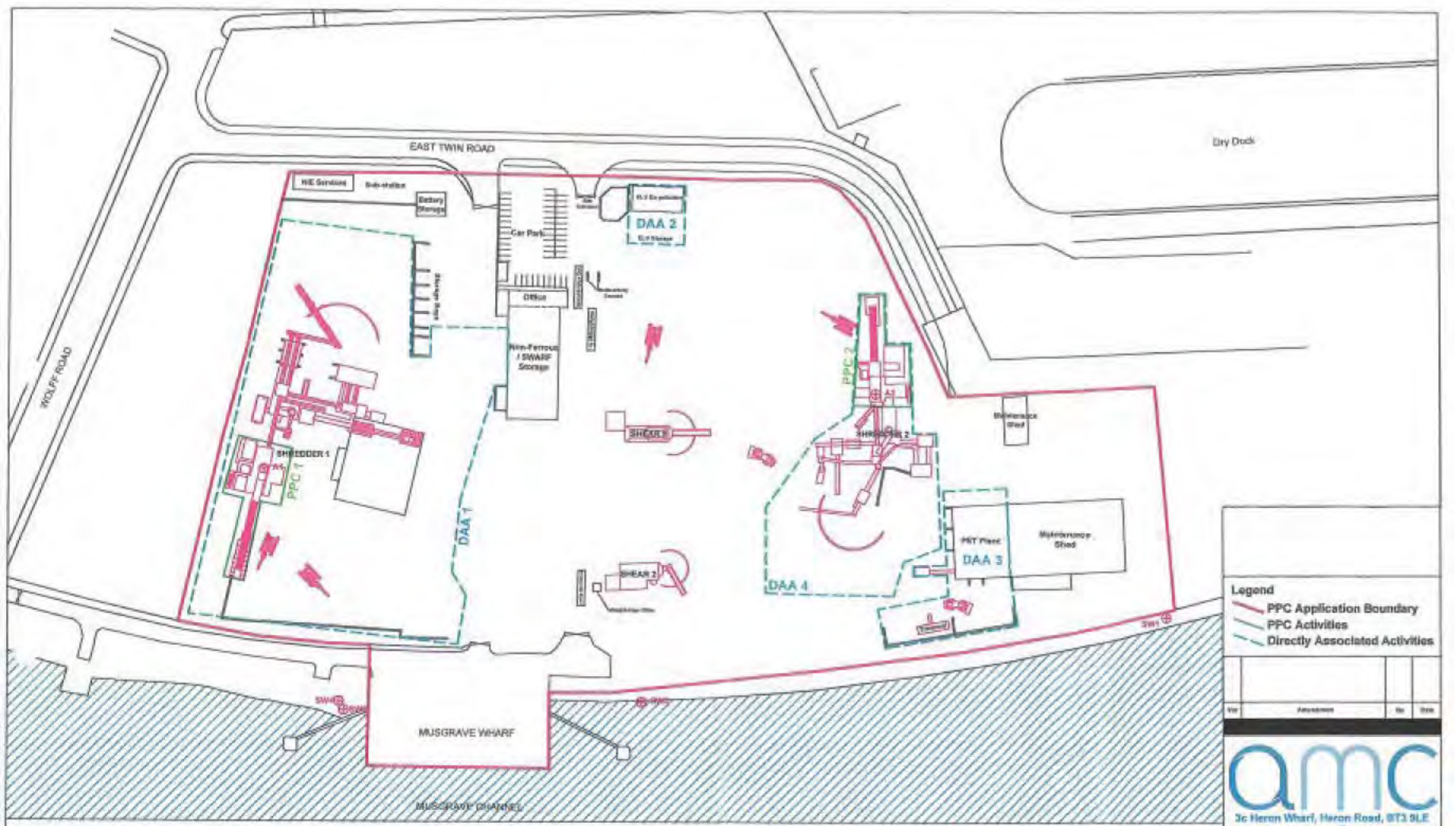
There were no exceedances or non-compliances recorded for annual production or treatment returns during the 2025 monitoring period. This evidence illustrates that the site is operating within the allowable throughput limit of 3300,000 Tonnes for all metal wastes and ELVs.

5.3 Next Monitoring Report

The next Annual Monitoring Report is due to be undertaken in early 2027 for the 2026 period in line with Permit P0483/15A/V1.

Report prepared by:	**Reviewed by:**
[redacted]	[redacted]
Environmental Consultant	**Waste Consultant**

APPENDIX 1: Site Layout and Monitoring Locations



Legend

- PPC Application Boundary
- PPC Activities
- Directly Associated Activities

Ver	Amendment	By	Date

amc
3c Heron Wharf, Heron Road, BT3 9LE
028 9073 0010 028 9073 0011
www.amcenvironmental.com

Client: Clearway

Project: PPC Application

Title: Figure 2 - Application Boundary

Scale at A3: 1:1500

Client Ref: CL0101F

Ver: 1

IED Processes and respective plant

AREA	PROCESS	TYPICAL EQUIPMENT
PPC 1	Shredder 1: Treatment in shredders of metal waste including waste electrical and electronic equipment and end-of-life vehicles and their components with a capacity exceeding 75 tonnes per day.	Shredder, in-feed conveyor, excavators
PPC 2	Shredder 2 (Standby shredder): Treatment in shredders of metal waste including waste electrical and electronic equipment and end-of-life vehicles and their components with a capacity exceeding 75 tonnes per day.	Shredder, in-feed conveyor, excavators
DAA 1	Storage of waste electrical and electronic equipment, end-of-life vehicles and metals prior to shredding. Physical treatment of shredded metal and residual wastes. Storage of metal and residual wastes post shredding.	Air separators, magnets, eddy currents, picking station, screeners, ferrous carousel, conveyors, loading shovels and excavators
	The storage of ELVs pending de-pollution prior to submission to shredding plant. The de-pollution of ELVs prior to shredding.	ELV De-Pollution unit, liquid storage, forklifts, excavators, power tools
DAA 3	PST (Post Shredder Technology) Plant - Physical treatment of metal and residual wastes following shredding.	Induction plant, conveyors, loading shovels, excavators
DAA 4	Shredder 2 - Standby shredder to be used in event of mechanical failure or maintenance of Shredder 1. Storage of wastes post shredding.	Standby shredder, conveyors, magents, eddy currents, air separators, screeners, loading shovel, excavators