APPENDIX 2: Water Quality Analysis: Laboratory Reports

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	03/07/2025
MCQ Quote Number		Date Analysis Started	04/07/2025
Purchase Order Number		Completion Date	21/07/2025
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

Where sample data is provided by the customer, the results relate to the sample supplied and on the basis that this data is correct. Incorrect sampling dates and/or sample information will affect the validity of results. This Test Certificate supersedes any version previously issued by the laboratory. The report shall not be reproduced except in full without approval of the laboratory.

Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Laboratory Technical Supervisor

Date Issued: 21/07/2025

UKAS TESTING
4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	**Belfast No. 1 Garage** [redacted]	03/07/2025	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (Total)		ug/l	N	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (Tot. Unfilt.)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			N/A	Tin (tot.unfilt)		ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No. 2 Original** [redacted]	03/07/2025	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (Total)		ug/l	N	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (Tot. Unfilt.)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			N/A	Tin (tot.unfilt)		ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No. 3 New Frag** [redacted]	03/07/2025	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (Total)		ug/l	N	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (Tot. Unfilt.)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
			N/A	Tin (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No. 4** [redacted]	03/07/2025	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (Total)		ug/l	N	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (Tot. Unfilt.)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			N/A	Tin (tot.unfilt)		ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø	Reporting limit raised due to sample matrix interference	ᴥ
Container with headspace provided for Volatiles analysis	¥	Deviation from method	◊
Matrix Interference	∞	Unsuitable sample	Θ

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	12/11/2025
MCQ Quote Number		Date Analysis Started	12/11/2025
Purchase Order Number		Completion Date	26/11/2025
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

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Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Laboratory Technical Supervisor

Date Issued: 26/11/2025

UKAS TESTING
4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	**BELFAST No.1 Garage** [redacted]	12/11/2025	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**BELFAST No.2 Original** [redacted]	12/11/2025	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**BELFAST No.3 New Frag** [redacted]	12/11/2025	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**BELFAST No.4** [redacted]	12/11/2025	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø	Reporting limit raised due to sample matrix interference	ᵡ
Container with headspace provided for Volatiles analysis	¥	Deviation from method	◊
Matrix Interference	∞	Unsuitable sample	Θ

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	09/12/2025
MCQ Quote Number		Date Analysis Started	09/12/2025
Purchase Order Number		Completion Date	16/12/2025
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

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Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Laboratory Technical Supervisor

Date Issued: 16/12/2025

UKAS TESTING
4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	**Belfast No1 Garage** [redacted] **1**	08/12/2025	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No2 Original** [redacted]	08/12/2025	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No3 New Frag** [redacted]	08/12/2025	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No4 Quay TC** [redacted]	08/12/2025	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø	Reporting limit raised due to sample matrix interference	ᵡ
Container with headspace provided for Volatiles analysis	¥	Deviation from method	◊
Matrix Interference	∞	Unsuitable sample	Θ

APPENDIX 3: Financial Provision: Clearway Belfast

Financial Provision: Clearway Belfast 2022

Item	Cost per tonne	Quantity	Cost
Processed and unprocessed ferrous metals	Potential Value		
Processed and unprocessed non-ferrous metals	Potential Value		
Un-depolluted ELVs	Potential Value		
Depolluted ELVs	Potential Value		
Batteries	Potential Value		
WEEE	Potential Value		
Transformers	Potential Value		
Petrol and diesel and mixtures of petrol and diesel			
Oil and air filters			
Oil contaminated rags			
Spent oil absorbents			
Oil/water mixture			
Waste oils			
Anti freeze and coolant			
Brake fluid			
Screen wash			
Air conditioning fluid			
Tyres			
Residues from treatment of ELVs			
Residues from treatment of other metal wastes			
Shredder residue (ASR) light fraction			
Shredder residue (ASR) heavy fraction			
Separated inert waste including industrial waste			
Separated plastic waste			
Quararantined wastes			
Sub Total			

Site remediation	Cost
Cleaning site surfaces	
Cleaning site drains	
Emptying/cleaning interceptors	
Additional remediation	
Sub Total	
Total Financial Provision	

APPENDIX 4: Certificate of Operator Competence : WAMITAB

WAMITAB

Waste Management Industry
Training and Advisory Board

QCA
Qualifications and
Curriculum Authority

National Vocational Qualification

Qualification Title:

Level 4 in Waste Management Operations - Managing Treatment Hazardous Waste (4TMH)

Qualification Accreditation Number:

[redacted]

This Certificate is awarded to

[redacted]

Awarded: 04/02/2008

Serial No [redacted]

Authorised

[redacted]

Director General, WAMITAB

[redacted]

Qualifications Manager, WAMITAB

WAMITAB, Waste Management Industry Training and Advisory Board, Peterbridge House, 3 The Lakes, Northampton, NN4 7HF
Telephone: 01604 231950 Fax: 01604 232457 Email: info.admin@wamitab.org.uk Website: www.wamitab.org.uk

[redacted]

From: [redacted]
Sent: 26 February 2026 15:26
To: [redacted]
Cc: [redacted]
Subject: RE: CM: Outstanding FP and Annual Monitoring Report

[redacted]

Thanks for sending this through. There are several points that need clarification or correction. Please review the points below:

1. The quarterly waste and production returns do not align with what was submitted to NIEA – please review and correct
2. Only 3 quarterly monitoring rounds have been reported instead of the required four – explanation of missing monitoring needed.
3. The permitted storage quantities of ELV's within the report exceed the figures submitted in the FP documentation – this should be amended to match the FP calculation.
4. The report details 90,000 vehicles as 90,000 tonnes for maximum annual throughput. The average vehicle tonnage is greater than this – the figure should be recalculated and corrected.
5. The report states that no complaints were received however a visit was conducted in response to a complaint in May 2025.
6. The report states there were no non-compliances but according to the CAR2 forms there were some non-compliances noted, please amend.
7. The permit requires a new groundwater baseline report to be completed every 5 years. This is now due and should be prepared and submitted in accordance with the permit schedule.
8. No completed or outstanding improvement conditions have been reported – please identify all relevant improvement conditions, confirm any completed during the year and provide status updates on any still outstanding.
9. Exceedances in the emission results have been listed but no corrective or preventative actions have been described – please detail the cause of each exceedance, any corrective action taken and long-term mitigation measures put in place.
10. Non-potable water use has not been included – please confirm if non-potable water is used on site and if so, provide the relevant figures.
11. No explanation is provided for the significant increase in potable water use – please justify these changes i.e. whether it reflects operational changes, leaks or inefficiency
12. Plans to improve water and energy efficiency should be included as required by Schedule 5.
13. The report does not include recommendations on improving the monitoring regime or addressing recurring issues – this section should include future recommendations.

We also don't seem to have a copy of the report for the 2024 year. Can you please send through a copy.

If you need clarification on any of the above, please don't hesitate to contact me.

Many thanks

[redacted]
Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road | Tonagh | Lisburn | Co. Antrim | BT28 3AL
[redacted]@daera-ni.gov.uk | www.daera-ni.gov.uk

From: [redacted]@clearway-group.co.uk>
Sent: 25 February 2026 10:08
To: [redacted]@daera-ni.gov.uk>; [redacted]@clearway-group.co.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: Re: CM: Outstanding FP and Annual Monitoring Report

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

Dear All,

We are pleased to have attached the 2025 AEMR for Clearway, Belfast. I apologise without reserve for this late submission.

[redacted] I am scheduled for a site assurance visit first thing but, I will be passing Lisburn on my way back. Would it be convenient for me to call by the offices say 1100?

Aye,

[redacted]

From: [redacted]@daera-ni.gov.uk>
Sent: Wednesday, February 25, 2026 08:37
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>
Subject: RE: CM: Outstanding FP and Annual Monitoring Report

[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

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

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 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

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' K

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 PPP Group in Portglenone. The tyre disposal rate is an agreement [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 [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

[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

[redacted]

From: [redacted]@clearway-group.co.uk>
Sent: 27 February 2026 10:24
To: [redacted]
Cc:
Subject: Re: CM: Outstanding FP and Annual Monitoring Report
Attachments: P3598, Annual Report, Clearway 2024.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

[redacted]

Thank you for your action points. I will discuss these with [redacted] and our consultants. We will have a response for you as soon as possible.

I have attached a copy of the 2024 AEMR in the interim. Have a great weekend.

Aye,

[redacted]

From: [redacted]@daera-ni.gov.uk>
Sent: Thursday, February 26, 2026 15:26
To: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>; [redacted]clearway-group.co.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: RE: CM: Outstanding FP and Annual Monitoring Report

[redacted]

Thanks for sending this through. There are several points that need clarification or correction. Please review the points below:

1. The quarterly waste and production returns do not align with what was submitted to NIEA – please review and correct
2. Only 3 quarterly monitoring rounds have been reported instead of the required four – explanation of missing monitoring needed.
3. The permitted storage quantities of ELV's within the report exceed the figures submitted in the FP documentation – this should be amended to match the FP calculation.
4. The report details 90,000 vehicles as 90,000 tonnes for maximum annual throughput. The average vehicle tonnage is greater than this – the figure should be recalculated and corrected.
5. The report states that no complaints were received however a visit was conducted in response to a complaint in May 2025.

6. The report states there were no non-compliances but according to the CAR2 forms there were some non-compliances noted, please amend.
7. The permit requires a new groundwater baseline report to be completed every 5 years. This is now due and should be prepared and submitted in accordance with the permit schedule.
8. No completed or outstanding improvement conditions have been reported – please identify all relevant improvement conditions, confirm any completed during the year and provide status updates on any still outstanding.
9. Exceedances in the emission results have been listed but no corrective or preventative actions have been described – please detail the cause of each exceedance, any corrective action taken and long-term mitigation measures put in place.
10. Non-potable water use has not been included – please confirm if non-potable water is used on site and if so, provide the relevant figures.
11. No explanation is provided for the significant increase in potable water use – please justify these changes i.e. whether it reflects operational changes, leaks or inefficiency
12. Plans to improve water and energy efficiency should be included as required by Schedule 5.
13. The report does not include recommendations on improving the monitoring regime or addressing recurring issues – this section should include future recommendations.

We also don't seem to have a copy of the report for the 2024 year. Can you please send through a copy.

If you need clarification on any of the above, please don't hesitate to contact me.

Many thanks

[redacted]
Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road | Tonagh | Lisburn | Co. Antrim | BT28 3AL
[redacted] daera-ni.gov.uk | www.daera-ni.gov.uk

From: [redacted]@clearway-group.co.uk>
Sent: 25 February 2026 10:08
To: [redacted]@daera-ni.gov.uk>; [redacted]@clearway-group.co.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: Re: CM: Outstanding FP and Annual Monitoring Report

Dear All,

We are pleased to have attached the 2025 AEMR for Clearway, Belfast. I apologise without reserve for this late submission.

[redacted] I am scheduled for a site assurance visit first thing but, I will be passing Lisburn on my way back. Would it be convenient for me to call by the offices say 1100?

Aye,

[redacted]

From: [redacted]@daera-ni.gov.uk>
Sent: Wednesday, February 25, 2026 08:37
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>
Subject: RE: CM: Outstanding FP and Annual Monitoring Report

[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

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
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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]

[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]

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Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

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

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Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

From: [redacted]@clearway-group.co.uk>
Sent: 30 January 2026 17:16
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Cc: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>
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Section 1(b) has been retained as the primary EWC control table.

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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

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Can you also confirm the figure [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]

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Sent: 21 January 2026 10:48
To: [redacted]@daera-ni.gov.uk>
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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 P3598 Issue 1
2024 Annual Environmental Monitoring Report

Clearway Belfast Scrap Metal Facility
East Twin Road
Belfast

Client: Clearway Disposals Ltd

Issued: February 2025

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

www.mclni.com

CONTENTS

APPENDICES

Figures

Tables

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) to presents a review of environmental monitoring undertaken at the PPC regulated Scrap Metal Facility at East Twin Road, Belfast Harbour Estate, BT3 9EN during 2024.

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 2024 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 2024 for surface water sampling carried out at the site. This included four monitoring rounds (13th March, 28th August, 19th October and 13th November 2024) 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 2024 to the 31st December 2024.

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 P3191, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2023 Annual Monitoring Report, Issued January 2024,
- Report 2883, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2022 Annual Monitoring Report, Issued January 2023,
- *Report 2582, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2021 Annual Monitoring Report, Issued February 2022,*
- *Report 2274, Environmental monitoring Report, Clearway Disposals Ltd Belfast Site, 2020 Annual Monitoring Report, Issued February 2021,*
- *Report 2065, 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

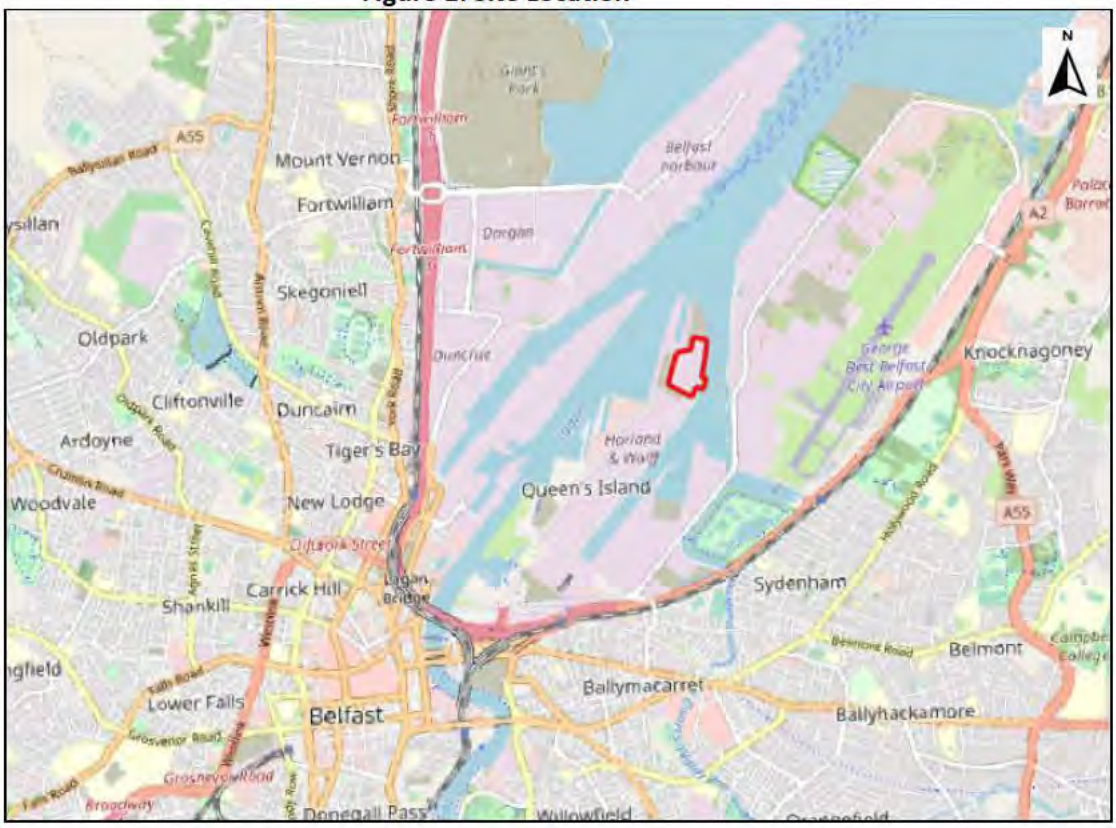
The report has been completed using the available environmental monitoring data which was collected at the site during the monitoring period (2024).

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 2024

	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 330,000 Tonnes 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 (13th March, 28th August, 9th October) and Annual (13th November).
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 2024 monitoring period 4No. sampling events took place: 13th March (Q1), 28th August (Q2), 9th October (Q3) and 13th November 2024 (Q4).

The samples collected in August 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 a McQuillan Envirocare for testing using the appropriate suite of parameters as specified in the Permit. The laboratory results are included in Appendix 2. It should be noted that the Client has utilised variable sample IDs across the 4No. visits which are summarised in Table 6.

Table 6: Permit and Laboratory References

Permit Ref	Laboratory Report reference			
	13/03/2024	28/08/2024	09/10/2024	13/11/2024
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:

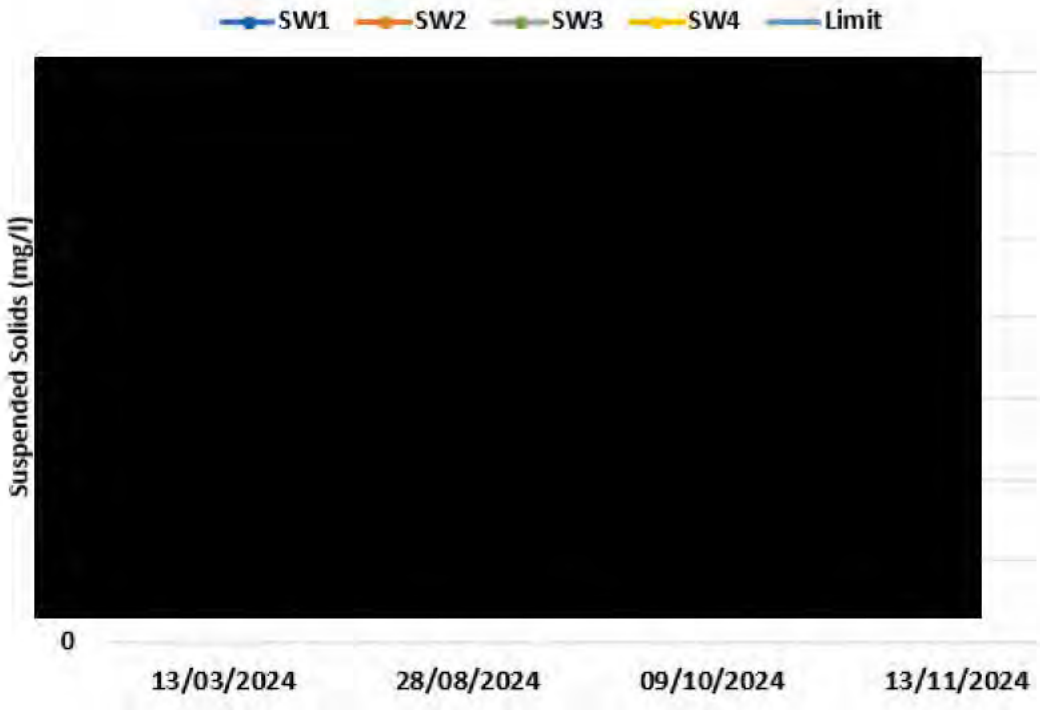
Table 7: Surface Water Quality Results

	Parameter	Limit	Sample Date			
			13th March	28th August	9th October	13th November
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 October at SW4 and in December at SW1, SW2 and SW4. SW3 showed no exceedances throughout 2024.

Figure 4: Summary of Suspended Solids Results 2024



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 2024 is detailed below.

Table 8: Summary of Surface Water Exceedances 13th November 2024

			Location			
Parameter	**EQS**	**Units**	**SW1**	**SW2**	**SW3**	**SW4**
Cadmium	[redacted]	ug/l	[redacted]			
Copper		ug/l				
Iron		ug/l				
Lead		ug/l				
Nickel		ug/l				
Zinc		ug/l				

4.2 Other Performance Parameters

Annual potable water usage on site for the period of January to December 2024 is 14,122m^3 up from 12,926m^3 last year.

Energy usage is required to be monitored annually on site. Electricity usage for 2024 was [redacted]. This is quite similar to the [redacted] reported in 2023.

Fuel Consumption for 2024 is detailed as follows;

[redacted] of Derv and heating oil were consumed onsite in 2024.

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 2024.

One Schedule 6 Notification was issued across 2024 with details summarised below;

- October: One Suspended Solids exceedance. Discharge TC22/93 exceeded at [redacted]

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 Emissions

Four exceedances of the Suspended Solids Permit Limit occurred in 2024. In October, Suspended Solids exceeded at SW4 ([redacted]l). November Suspended Solids exceeded at SW1 ([redacted]), SW2 ([redacted]l) and SW4 (at [redacted]. pH was also exceeded in October at SW3 (pH[redacted]).

There were multiple EQS exceedances throughout 2024 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

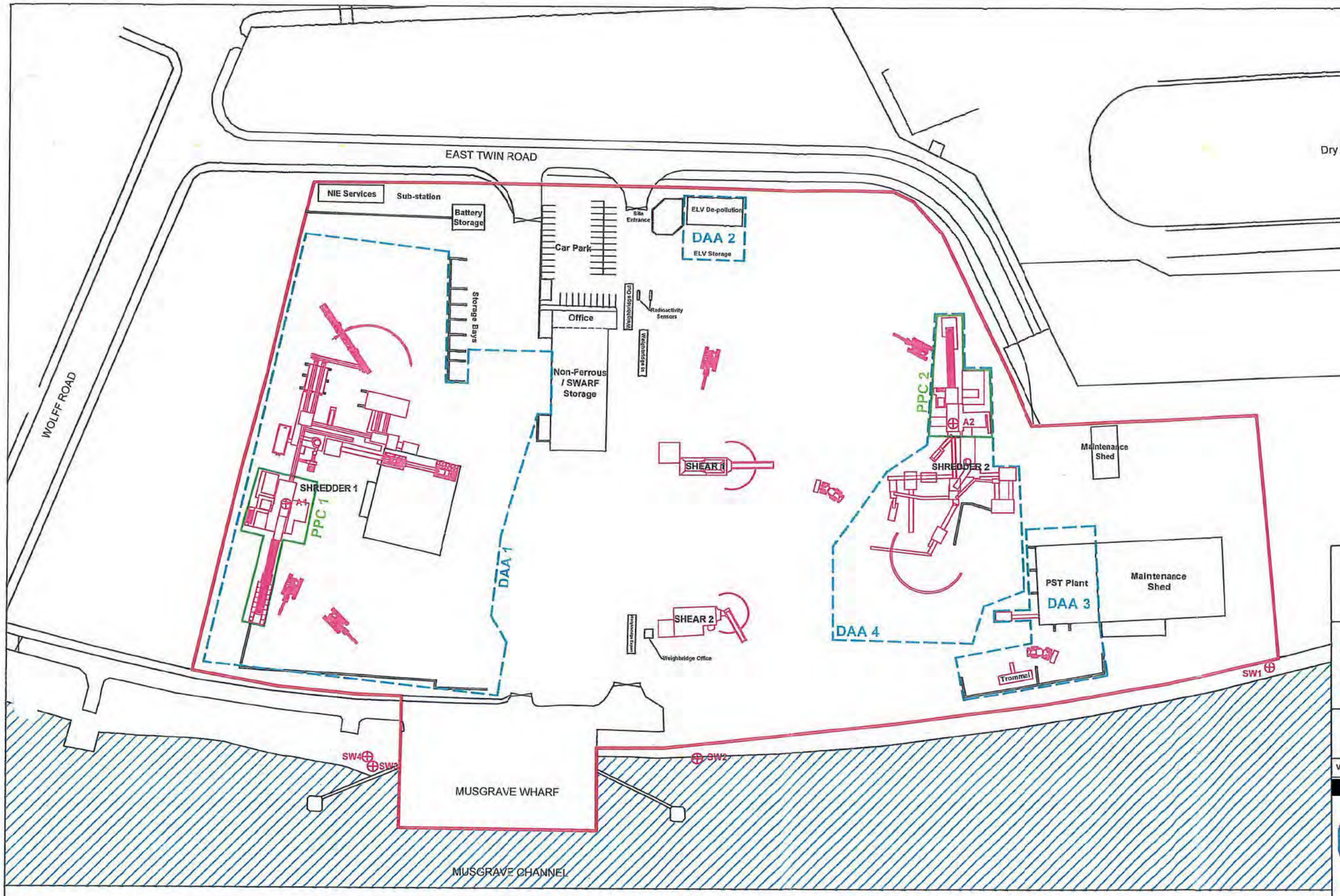
There were no exceedances or non-compliances recorded for annual production or treatment returns during the 2024 monitoring period. This evidence illustrates that the site is operating within the allowable throughput limit of 3300,000 Tonnes for all metal wastes and ELVs.

5.3 Next Monitoring Report

The next Annual Monitoring Report is due to be undertaken in early 2026 for the 2025 period in line with Permit P0483/15A/V1.

Report prepared by:	**Reviewed by:**
[redacted]	[redacted]
Environmental Technician	**Land Quality Consultant**

APPENDIX 1: Site Layout and Monitoring Locations



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, magners, eddy currents, picking station, screeners, ferrous carousel, conveyors, loading shovels and excavators
DAA 2	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

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	Ver.
Client Ref:	CL0101F	1

APPENDIX 2: Water Quality Analysis: Laboratory Reports

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	15/03/2024
MCQ Quote Number		Date Analysis Started	15/03/2024
Purchase Order Number		Completion Date	27/03/2024
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

Where sample data is provided by the customer, the results relate to the sample supplied and on the basis that this data is correct. Incorrect sampling dates and/or sample information will affect the validity of results. This Test Certificate supersedes any version previously issued by the laboratory. The report shall not be reproduced except in full without approval of the laboratory.

Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Administrator

Date Issued: 27/03/2024

UKAS TESTING
4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	**Belfast No.1** [redacted]	13/03/2024	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.3** [redacted]	13/03/2024	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø		

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	29/08/2024
MCQ Quote Number		Date Analysis Started	29/08/2024
Purchase Order Number		Completion Date	11/09/2024
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

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Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Senior Lab Administrator

Date Issued: 11/09/2024

UKAS TESTING
4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	**Belfast No.1** [redacted]	28/08/2024	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.2** [redacted]	28/08/2024	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.3** [redacted]	28/08/2024	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.4** [redacted]	28/08/2024	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø		

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	10/10/2024
MCQ Quote Number		Date Analysis Started	10/10/2024
Purchase Order Number		Completion Date	22/10/2024
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

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Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Senior Lab Administrator

Date Issued: 22/10/2024

UKAS TESTING
4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	**Belfast No.1** [redacted]	09/10/2024	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.2** [redacted]	09/10/2024	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.3** [redacted]	09/10/2024	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.4** [redacted]	09/10/2024	SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø	Reporting limit raised due to sample matrix interference	ᵡ
Container with headspace provided for Volatiles analysis	¥	Deviation from method	◊
Matrix Interference	∞	Unsuitable sample	Θ

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	14/11/2024
MCQ Quote Number		Date Analysis Started	14/11/2024
Purchase Order Number		Completion Date	17/12/2024
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

Where sample data is provided by the customer, the results relate to the sample supplied and on the basis that this data is correct. Incorrect sampling dates and/or sample information will affect the validity of results. This Test Certificate supersedes any version previously issued by the laboratory. The report shall not be reproduced except in full without approval of the laboratory.

Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Senior Lab Administrator

Date Issued: 17/12/2024

UKAS TESTING
4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	**Belfast No.1 Garage** [redacted]	13/11/2024	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (tot.unfilt)		ug/l	Y	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (tot.unfilt)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			N/A	Tin (tot.unfilt)		ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.2 Original** [redacted]	13/11/2024	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (tot.unfilt)		ug/l	Y	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (tot.unfilt)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			N/A	Tin (tot.unfilt)		ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.3 New Frag** [redacted]	13/11/2024	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (tot.unfilt)		ug/l	Y	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (tot.unfilt)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
			N/A	Tin (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No.4** [redacted]	13/11/2024	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (tot.unfilt)		ug/l	Y	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (tot.unfilt)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			N/A	Tin (tot.unfilt)		ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø	Reporting limit raised due to sample matrix interference	ᴥ
Container with headspace provided for Volatiles analysis	¥	Deviation from method	◊
Matrix Interference	∞	Unsuitable sample	Θ

APPENDIX 3: Financial Provision: Clearway Belfast

Financial Provision: Clearway Belfast 2022

Item	Cost per tonne	Quantity	Cost
Processed and unprocessed ferrous metals	Potential Value		
Processed and unprocessed non-ferrous metals	Potential Value		
Un-depolluted ELVs	Potential Value		
Depolluted ELVs	Potential Value		
Batteries	Potential Value		
WEEE	Potential Value		
Transformers	Potential Value		
Petrol and diesel and mixtures of petrol and diesel	[redacted]		
Oil and air filters			
Oil contaminated rags			
Spent oil absorbents			
Oil/water mixture			
Waste oils			
Anti freeze and coolant			
Brake fluid			
Screen wash			
Air conditioning fluid			
Tyres			
Residues from treatment of ELVs			
Residues from treatment of other metal wastes			
Shredder residue (ASR) light fraction			
Shredder residue (ASR) heavy fraction			
Separated inert waste including industrial waste			
Separated plastic waste			
Quararantined wastes			
Sub Total			

Site remediation	[redacted]
Cleaning site surfaces	
Cleaning site drains	
Emptying/cleaning interceptors	
Additional remediation	
Sub Total	

Total Financial Provision	[redacted]

APPENDIX 4: Certificate of Operator Competence : WAMITAB

WAMITAB

Waste Management Industry
Training and Advisory Board

QCA
Qualifications and
Curriculum Authority

National Vocational Qualification

Qualification Title:

Level 4 in Waste Management Operations - Managing Treatment Hazardous Waste (4TMH)

Qualification Accreditation Number:

[redacted]

This Certificate is awarded to

[redacted]

Awarded: 04/02/2008

Serial No [redacted]

Authorised

[redacted] .....
Director General, WAMITAB

[redacted] .....
Qualifications Manager, WAMITAB

WAMITAB. Waste Management Industry Training and Advisory Board. Peterbridge House, 3 The Lakes, Northampton, NN4 7HE
Telephone: 01604 231950 Fax: 01604 232457 Email: info.admin@wamitab.org.uk Website: www.wamitab.org.uk

[redacted]

From: [redacted]@clearway-group.co.uk>
Sent: 13 April 2026 10:08
To: [redacted]
Cc:
Subject: Re: CM: Outstanding FP and Annual Monitoring Report
Attachments: P4003-Issue 2, Annual Report, Clearway 2025.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

[redacted]

I trust you are well. Thank you again for your feedback regarding initial 2025 Annual Monitoring Report.

We appreciate the detailed review and the clarification on the specific points requiring correction. Along with our consultants have completed a revised version of the report for your review. Please let us know if there is any further information you require. Thank you.

Aye,

From: [redacted]@daera-ni.gov.uk>
Sent: 26 February 2026 15:26
To: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@clearway-group.co.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: RE: CM: Outstanding FP and Annual Monitoring Report

[redacted]

Thanks for sending this through. There are several points that need clarification or correction. Please review the points below:

1. The quarterly waste and production returns do not align with what was submitted to NIEA – please review and correct
2. Only 3 quarterly monitoring rounds have been reported instead of the required four – explanation of missing monitoring needed.
3. The permitted storage quantities of ELV's within the report exceed the figures submitted in the FP documentation – this should be amended to match the FP calculation.
4. The report details 90,000 vehicles as 90,000 tonnes for maximum annual throughput. The average vehicle tonnage is greater than this – the figure should be recalculated and corrected.
5. The report states that no complaints were received however a visit was conducted in response to a complaint in May 2025.

[redacted]

6. The report states there were no non-compliances but according to the CAR2 forms there were some non-compliances noted, please amend.
7. The permit requires a new groundwater baseline report to be completed every 5 years. This is now due and should be prepared and submitted in accordance with the permit schedule.
8. No completed or outstanding improvement conditions have been reported – please identify all relevant improvement conditions, confirm any completed during the year and provide status updates on any still outstanding.
9. Exceedances in the emission results have been listed but no corrective or preventative actions have been described – please detail the cause of each exceedance, any corrective action taken and long-term mitigation measures put in place.
10. Non-potable water use has not been included – please confirm if non-potable water is used on site and if so, provide the relevant figures.
11. No explanation is provided for the significant increase in potable water use – please justify these changes i.e. whether it reflects operational changes, leaks or inefficiency
12. Plans to improve water and energy efficiency should be included as required by Schedule 5.
13. The report does not include recommendations on improving the monitoring regime or addressing recurring issues – this section should include future recommendations.

We also don't seem to have a copy of the report for the 2024 year. Can you please send through a copy.

If you need clarification on any of the above, please don't hesitate to contact me.

Many thanks

[redacted]
Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road | Tonagh | Lisburn | Co. Antrim | BT28 3AL
[redacted] daera-ni.gov.uk | www.daera-ni.gov.uk

From: [redacted]@clearway-group.co.uk>
Sent: 25 February 2026 10:08
To: [redacted]@daera-ni.gov.uk>; [redacted]@clearway-group.co.uk>
Cc: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Subject: Re: CM: Outstanding FP and Annual Monitoring Report

Dear All,

We are pleased to have attached the 2025 AEMR for Clearway, Belfast. I apologise without reserve for this late submission.

[redacted] I am scheduled for a site assurance visit first thing but, I will be passing Lisburn on my way back. Would it be convenient for me to call by the offices say 1100?

Aye,

[redacted]

From: [redacted]@daera-ni.gov.uk>
Sent: Wednesday, February 25, 2026 08:37
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>
Subject: RE: CM: Outstanding FP and Annual Monitoring Report

[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
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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' 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]
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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]			
Table 2 of WP				
FP Calculation				

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]
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Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

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 [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]

Amy 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

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Gníomhaireacht de chuid na Roinne Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

An Agen Fairi 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

[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,

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

Report P4003_Issue 2
2025 Annual Environmental Monitoring Report

Clearway Belfast Scrap Metal Facility
East Twin Road
Belfast

Client: Clearway Disposals Ltd

Issued: April 2026

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

CONTENTS

APPENDICES

Figures

Tables

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.

During the 2025 monitoring period at Clearway, only 2no. Quarterly monitoring rounds and 1no. Annual monitoring round were undertaken. Clearway have stated this was a singular lapse in governance which Clearway has now alleviated for by adding further staff to the SHEQ compliance team.

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

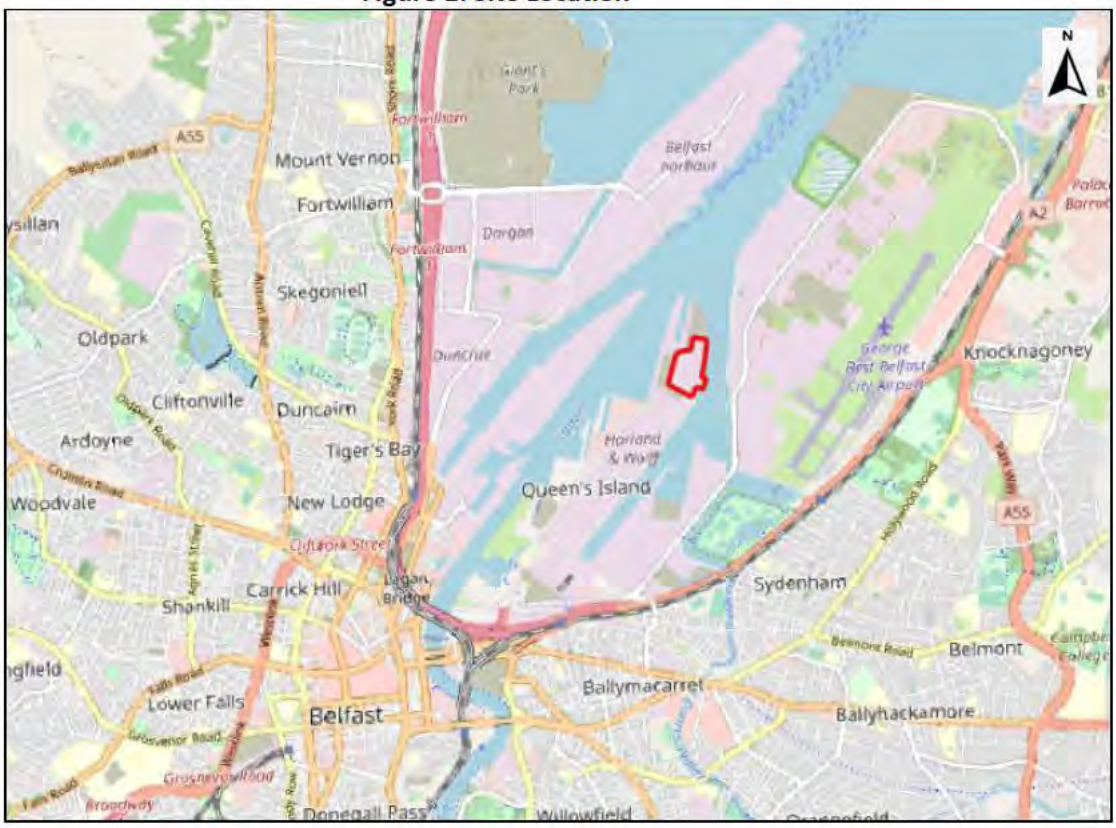
The report has been completed using the available environmental monitoring data which was collected at the site during the monitoring period (2025).

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
101316						
120101						
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 330,000 Tonnes 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 a McQuillan Envirocare 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]	[redacted]	[redacted]
SW2	[redacted]	[redacted]	[redacted]
SW3	[redacted]	[redacted]	[redacted] Frag TC22/09
SW4	[redacted]	[redacted]	[redacted]

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	50 mg/l	[redacted]		
	pH	6-9			
	Visible Oil/Grease	Nil			
SW2	Suspended Solids	50 mg/l			
	pH	6-9			
	Visible Oil/Grease	Nil			
SW3	Suspended Solids	50 mg/l			
	pH	6-9			
	Visible Oil/Grease	Nil			
SW4	Suspended Solids	50 mg/l			
	pH	6-9			
	Visible Oil/Grease	Nil			

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. Clearway are aware there has been a sizeable increase in water usage on the site. There was a significant period of warm and very dry weather at the beginning of Spring into early Summer of 2025, the organisation used a proportion of water at this time to reduce the dust from the site. While this is not usually an issue, the leadership team at Belfast felt it was appropriate to manage dust during this period.

The organisation also intends to request NI Water to eliminate the possibility of leak by doing a night-time check on the meter.

Harvested non-potable water used on site is not metered as potable water is the main source. Non-potable water is used with a combination of potable water in the shredder plant to suppress dust fires and explosions. The available harvested water was well below average from April to October but issues with the pumping system increased the potable water needed to make up the deficit.

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] Litres of Diesel were consumed onsite in 2025.

4.3 Additional Information

4.3.1 Technically Competent Person

Formal training has been carried out by the landfill operator (WAMITAB) and the registration certificate is included as Appendix 3.

4.3.2 Other

There was one complaint received in May 2025 where allegations of excess smoke, frequent oil and other burning fuel smells and sounds of multiple explosions a day. The NIEA visited the site following the complaint on 22nd May 2025 and confirmed there was no evidence of smoke, debris, explosions or fire on-site at the time of the visit.

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

- 3rd July – exceedance of suspended solids, sample point [redacted] This exceedance was caused by an accumulation of silt and sludge within the upstream silt trap and the interceptor. Immediate corrective action involved cleaning the silt trap and removing sludge from the interceptor. To prevent recurrence of the exceedance, the frequency of internal inspections and cleaning schedules increased, and Clearway are committed to taking follow up samples after maintenance.
- 12th November – exceedance of suspended solids, sample point [redacted] This exceedance was primarily attributed to heavy buildup within the interceptor and associated drainage channel. For long term mitigation, frequency of internal inspections for these areas has increased. Additionally, significant engineering works are scheduled for 2026 to improve the channelling and overall processing capability of the Belfast No 3 area to ensure future compliance.
- 8th December – exceedance of suspended solids, sample point [redacted] This exceedance was primarily attributed to heavy buildup within the interceptor and associated drainage channel. Corrective action included cleaning of the interceptor and associated channel with long term mitigation involving the increased frequency of internal inspections for

these areas. Additionally, significant engineering works are scheduled for 2026 to improve the channelling and overall processing capability of the Belfast No 3 area to ensure future compliance. Site meetings have already taken place to arrange for tendering processes to begin in earnest.

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] 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 recorded for annual production or treatment returns during the 2025 monitoring period.

There were 2no. non-compliances recorded for annual production/treatment returns during the 2025 monitoring period:

- 30th June 2025 – during scheduled monitoring the inspection identified areas of non-compliance including for the "Frag" building which has several missing roof sheets. Waste "fines" at the rear of the site exceeded the permitted quantities allowed and fines had been stored on-site for longer than a one-year period. Corrective actions required fixing of the "Frag" building roof and to see a reduction of the quantity of fines to acceptable levels.
- 17th September 2025 – during scheduled monitoring a follow-up inspection assessing the progress of the above identified issues. Compliance improved in most areas with operations, waste types and waste quantities found to be compliant (Score 0). Status of previous actions noted that the operator had begun clearing the fines that were stored beyond the one-year limit. Corrective action required that Clearway continue the clearance of the over-stored fines and that the requested changes to the Working Plan were submitted to the Department. Both were completed.

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 Recommendations

The below are recommendations that will be implemented within in the next monitoring year to improve the monitoring regime and address current issues:

- To improve water and energy efficiency, Clearway will continue their development of the fire suppression systems to "mist" areas at risk of thermal events opposed to the previous technique of dowsing.
- Clearway will focus on the improvement and maintenance of the laundry equipment on site in order to reduce water usage and energy consumption
- Clearway plan further reductions in energy usage through the continued upgrade of lighting to more efficient LEDs whenever the opportunity arises, and more efficient water heating systems in the future
- During monitoring rounds, if there is an exceedance of a permitted parameter, Clearway will take a repeat sample and submit for analysis within 7no. days. If this exceedance still occurs, they will submit proposed remedial actions for the exceedance to the NIEA.

5.4 Improvement Conditions

There were no improvement conditions works undertaken in 2025.

Relevant improvement conditions planned for 2026 include:

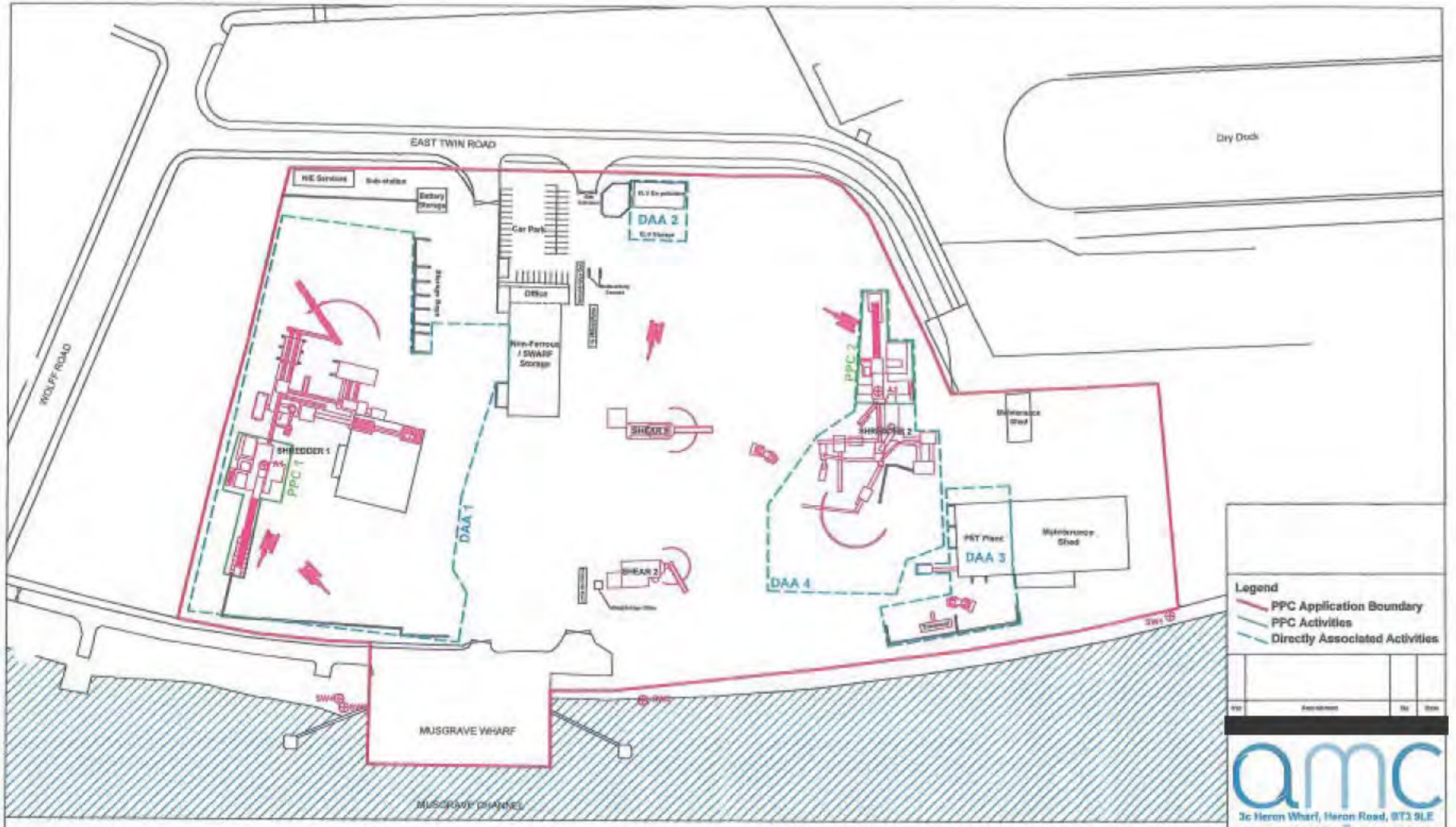
- Installation of a new post shredder separation plant for recovering metals from eddy current separator residues
- Installation of a new screen plant to process "dock fines" containing circa 60% metals

5.5 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



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

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

Drawing No: CL0101F

Rev: 1

APPENDIX 2: Water Quality Analysis: Laboratory Reports

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	03/07/2025
MCQ Quote Number		Date Analysis Started	04/07/2025
Purchase Order Number		Completion Date	21/07/2025
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

Where sample data is provided by the customer, the results relate to the sample supplied and on the basis that this data is correct. Incorrect sampling dates and/or sample information will affect the validity of results. This Test Certificate supersedes any version previously issued by the laboratory. The report shall not be reproduced except in full without approval of the laboratory.

Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Laboratory Technical Supervisor

Date Issued: 21/07/2025

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4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	[redacted]	03/07/2025	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (Total)		ug/l	N	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (Tot. Unfilt.)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			N/A	Tin (tot.unfilt)		ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	[redacted]	03/07/2025	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (Total)		ug/l	N	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (Tot. Unfilt.)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			N/A	Tin (tot.unfilt)		ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	[redacted]	03/07/2025	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (Total)		ug/l	N	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (Tot. Unfilt.)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
			N/A	Tin (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	[redacted]	03/07/2025	N/A	Aluminium (tot.unfilt)	[redacted]	ug/l	Y	S	
			N/A	Arsenic (tot.unfilt)		ug/l	Y	S	
			N/A	Barium (tot.unfilt)		ug/l	Y	S	
			N/A	Cadmium (tot.unfilt)		ug/l	Y	S	
			N/A	Chromium (tot.unfilt)		ug/l	Y	S	
			N/A	Cobalt (Total)		ug/l	N	S	
			N/A	Copper (tot.unfilt)		ug/l	Y	S	
			N/A	Iron (Tot. Unfilt.)		mg/l	Y	S	
			N/A	Lead (tot.unfilt)		ug/l	Y	S	
			N/A	Mercury (tot.unfilt)		ug/l	N	S	
			N/A	Molybdenum (tot.unfilt)		ug/l	Y	S	
			N/A	Nickel (tot.unfilt)		ug/l	Y	S	
			SAM004	pH		Units	Y	McQ	
			SAM001	Suspended Solids		mg/l	Y	McQ	
			N/A	Tin (tot.unfilt)		ug/l	Y	S	
			N/A	Vanadium (tot.unfilt)		ug/l	Y	S	
			MCQ-VOG	Visible Oil and Grease		%	N	McQ	
			N/A	Zinc (tot.unfilt)		ug/l	Y	S	
Time Sampled: 12:30	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø	Reporting limit raised due to sample matrix interference	ᴥ
Container with headspace provided for Volatiles analysis	¥	Deviation from method	◊
Matrix Interference	∞	Unsuitable sample	Θ

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	12/11/2025
MCQ Quote Number		Date Analysis Started	12/11/2025
Purchase Order Number		Completion Date	26/11/2025
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

Where sample data is provided by the customer, the results relate to the sample supplied and on the basis that this data is correct. Incorrect sampling dates and/or sample information will affect the validity of results. This Test Certificate supersedes any version previously issued by the laboratory. The report shall not be reproduced except in full without approval of the laboratory.

Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Laboratory Technical Supervisor

Date Issued: 26/11/2025

UKAS TESTING
4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: **1**

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	[redacted]	12/11/2025	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids	[redacted]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[redacted]	%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**		[redacted]				
[redacted]	[redacted]	12/11/2025	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids	[redacted]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[redacted]	%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**		[redacted]				
[redacted]	[redacted]	12/11/2025	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids	[redacted]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[redacted]	%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**		[redacted]				
[redacted]	[redacted]	12/11/2025	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids	[redacted]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[redacted]	%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø	Reporting limit raised due to sample matrix interference	ᵡ
Container with headspace provided for Volatiles analysis	¥	Deviation from method	◊
Matrix Interference	∞	Unsuitable sample	Θ

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Amendment to report: -

Clearway
East Twin Road
Belfast
BT3 9EN

McQuillan Envirocare Ltd t/a McQuillan Environmental
Caulside Drive, New Park Industrial Estate
Antrim, BT41 2DU

Tel: (028) 9446 6708
Fax: (028) 9442 9580

www.mcquillancompanies.com
[redacted]@mcqcos.com

MCQ Job Number	[redacted]	Sample Receipt Date	09/12/2025
MCQ Quote Number		Date Analysis Started	09/12/2025
Purchase Order Number		Completion Date	16/12/2025
No. of Samples		Turnaround Time	10 working days

[redacted]

Analysis of your sample(s) is now complete and we have pleasure in enclosing the appropriate test report.

All analysis was completed within McQuillan Environmental Analytical Laboratory (MCQ) unless otherwise specified. Results relate only to the items tested. Any analysis that was subcontracted to an approved laboratory is indicated by 'S'. Please refer to the table at the end of your test certificate for explanations of sample deviations.

Where sample data is provided by the customer, the results relate to the sample supplied and on the basis that this data is correct. Incorrect sampling dates and/or sample information will affect the validity of results. This Test Certificate supersedes any version previously issued by the laboratory. The report shall not be reproduced except in full without approval of the laboratory.

Should you have any queries regarding this report(s) or any part of our service, please contact Sample Booking on 028 9448 3195 who will be happy to discuss your requirements.

Thank you for using our Laboratory and we look forward to receiving your next samples.

Yours Sincerely [redacted]

Report Authorised [redacted] Position: Laboratory Technical Supervisor

Date Issued: 16/12/2025

UKAS TESTING
4209

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Lab Ref	Sample Details	Sample Date	Method No.	Test	Result	Units	ACC	Lab	Sample Deviations
[redacted]	**Belfast No1** [redacted]	08/12/2025	SAM004	pH	[redacted]1	Units	Y	McQ	
			SAM001	Suspended Solids	[redacted]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[redacted]	%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No2** [redacted]	08/12/2025	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids	[redacted]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[redacted]	%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No3** [redacted]	08/12/2025	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids	[redacted]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[redacted]	%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						
[redacted]	**Belfast No4** [redacted]	08/12/2025	SAM004	pH	[redacted]	Units	Y	McQ	
			SAM001	Suspended Solids	[redacted]	mg/l	Y	McQ	
			MCQ-VOG	Visible Oil and Grease	[redacted]	%	N	McQ	
Time Sampled: 10:00	**Sample Matrix:**	Surface Water	**Analyst Comment:**						

MCQUILLAN ENVIRONMENTAL

Test Certificate

Certificate: [redacted]
Issue No.: 1

Sample Deviations:

Sample Deviations Legend - Results may be compromised if the following deviations apply			
Comment	C	Incorrect Container	‡
Container with Headspace provided	8	Insufficient sample volume	Ë
BOD Overdiluted, therefore result indicative only	Ş	BOD Underdiluted, therefore result indicative only	#
High Chloride concentration, COD could not be determined	§	Holding time exceeded due to sampled on date/time	@
Holding time exceeded in Lab	±	Holding time exceeded due to delayed instructions	&
Sample integrity Jeopardized in receipt	Ø	Reporting limit raised due to sample matrix interference	ᵡ
Container with headspace provided for Volatiles analysis	¥	Deviation from method	◊
Matrix Interference	∞	Unsuitable sample	Θ

APPENDIX 3: Certificate of Operator Competence: WAMITAB

WAMITAB

Waste Management Industry
Training and Advisory Board

QCA
Qualifications and
Curriculum Authority

National Vocational Qualification

Qualification Title:

Level 4 in Waste Management Operations - Managing Treatment Hazardous Waste (4TMH)

Qualification Accreditation Number:

[redacted]

This Certificate is awarded to

[redacted]

Awarded: 04/02/2008

Serial No [redacted]

Authorised

[redacted]

Director General, WAMITAB

[redacted]

Qualifications Manager, WAMITAB

WAMITAB, Waste Management Industry Training and Advisory Board, Peterbridge House, 3 The Lakes, Northampton, NN4 7HF
Telephone: 01604 231950 Fax: 01604 232457 Email: info.admin@wamitab.org.uk Website: www.wamitab.org.uk

[redacted]

From: [redacted]
Sent: 23 June 2026 11:25
To: [redacted]
Cc: [redacted]
Subject: RE: Clearway Belfast Incident Response MAY 2026
Attachments: Amendment to Fire Action Plan, p.31 of the Belfast Working Plan 2026.docx

[redacted]

Many thanks for the attached, I am content that the WP can be updated.

Regards

[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 Fairi an' K

From: [redacted]@clearway-group.co.uk>
Sent: 16 June 2026 14:46
To: [redacted]@daera-ni.gov.uk>
Cc: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>
Subject: Re: Clearway Belfast Incident Response MAY 2026

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

[redacted]

Thank you for replying. I have attached a revised Fire Action Plan for Belfast. If you are contents with the additional information I will add this to our WP and discuss the updates with our with the staff here. We have reviewed our Fire Policy again also. Thank you again.

Aye,

[redacted]

From: [redacted]@daera-ni.gov.uk>
Sent: 15 June 2026 11:31
To: [redacted]@clearway-group.co.uk>
Cc: [redacted]@clearway-group.co.uk>; [redacted]@daera-ni.gov.uk>; [redacted]@clearway-group.co.uk>
Subject: FW: Clearway Belfast Incident Response MAY 2026

[redacted]

Apologies for the delay in replying.

Thank you for the attached. I appreciate, from you e-mail of 11 June , that the NIFRS report hasn't been received yet.

I require a couple of small additions to the Fire Action Plan to address the onsite fire engine and the sprinkler system for fighting fire or the infrared cameras for monitoring temperatures within the waste pile. Appreciate if these could be added along with any additional measures or procedures you have put in place.

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]
Sent: 01 June 2026 08:03
To: [redacted]@daera-ni.gov.uk>; [redacted]@daera-ni.gov.uk>
Cc: [redacted]@clearway-group.co.uk>; [redacted]@clearway-group.co.uk>
Subject: Clearway Belfast Incident Response MAY 2026

Good morning,

Thank you for the CAR2. We are pleased to attach the current information pertaining to the fire last Sunday. The logs include:

1. Timeline, WP, SP and drainage plans
2. Internal RfI, Internal Fire Inv Pro-Forma, S6, RIDDOR, TBTs
3. Training & development records
4. EHS, NIFRS Incident Log Request

We have paid NIFRS for the report and are now waiting on their response.

Should you require any further information please allow me to be of assistance. Thank you.

Aye,

Clearway Metal Recycling
Hammond Lane Metal Company
Part of the Clearway Group

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

Amendment to Fire Action Plan, p.31 of the Belfast Working Plan 2026

h. Fire Action Plan

Accident and emergency procedures have been prepared for the East Twin Road site. The Fire Action Plan is contained within Appendix 2 of the site's Working Plan, with a copy held in the site's weighbridge office and made available for inspection.

The Fire Action Plan sets out the arrangements for raising the alarm, evacuation, emergency contact, first-response actions, regulator notification, fire service liaison, use of onsite firefighting resources, movement of material where safe, protection of drainage systems and post-incident reporting.

The Fire Action Plan includes reference to the following site fire prevention and response provisions:

- fire alarm and evacuation arrangements;
- nominated fire assembly points;
- trained fire marshals;
- fire extinguishers and fire packs;
- fire hydrants;
- mobile 1,000-litre IBC with high-pressure pump;
- onsite Dennis fire engines / fire appliances;
- sprinkler, water injection or suppression systems where installed;
- infrared camera / thermal monitoring arrangements where installed;
- stockpile inspection and monitoring;
- quarantine arrangements for hot, smoking, suspect or non-conforming material;
- mobile plant and material handlers available to move or separate material where safe;
- site drainage, interceptor and firewater protection arrangements;
- emergency contact details for NIFRS, NIEA, Belfast Harbour and Company management.

In the event of a fire, smoke, smouldering material, abnormal heat, thermal camera alarm, suspected battery event, gas cylinder event, plant fire or hot load, the alarm shall be raised immediately and site operatives shall evacuate to the nominated fire assembly point unless specifically directed otherwise by the person in charge of the incident.

Emergency procedures are also in place for power failure, gas explosion, traffic accident, machinery failure, spillages, leaks and other abnormal events. Site operatives shall be familiar with these procedures and their responsibilities in the event of an emergency.

All incidents, fires, near misses, abnormal heat events, fire alarm activations, thermal camera alarms, use of firefighting equipment and regulator notifications shall be recorded in the site diary and investigated proportionately.

Appendix 2 – Fire Action Plan

Scope

This Fire Action Plan applies to all fire-related events at Clearway Disposals Ltd, East Twin Road, Belfast Harbour, including fires, smoke, smouldering material, hot loads, abnormal heat readings, thermal camera alarms, suspected lithium-ion battery events, gas cylinder events, plant fires, electrical fires, hot works fires and stockpile fires.

The purpose of the plan is to protect life, raise the alarm promptly, evacuate persons safely, support emergency service attendance, limit fire spread, reduce environmental harm and ensure appropriate notification to regulators and relevant interested parties.

Responsibilities

The Operations Manager and Commercial Manager are responsible for ensuring that this Fire Action Plan is implemented and communicated to relevant personnel.

Site management shall ensure that operatives are trained in the Fire Action Plan, that training is documented, and that operatives understand their role in the event of fire, smoke, abnormal heat or other fire-related emergency.

The Site Manager or most senior competent person present shall act as the initial Site Incident Controller until relieved by a more senior manager or until Northern Ireland Fire and Rescue Service takes command of the fireground.

Fire marshals shall assist with evacuation, roll call and reporting to the Site Incident Controller.

Only trained and authorised persons may use onsite firefighting equipment beyond first-aid firefighting equipment.

No person shall place themselves at unnecessary risk to fight a fire.

Immediate action on discovering a fire

On discovering a fire, smoke, smouldering material, abnormal heat, suspected battery event, gas cylinder event or hot load, personnel shall:

1. Raise the alarm immediately.
2. Notify the Site Manager, supervisor or person in charge.
3. Contact Northern Ireland Fire and Rescue Service by calling 999 where there is any risk of escalation, fire spread, stockpile involvement, battery involvement, gas cylinder involvement, plant involvement, building involvement, or where the fire cannot be immediately and safely controlled.
4. Evacuate the affected premises, work area or site area as instructed.
5. Proceed to the nominated fire assembly point.
6. Report to the fire marshal or roll-call controller.
7. Await further instruction.

Personnel shall not stop to collect personal belongings.

Personnel shall not re-enter the affected area unless authorised by the person in charge of the incident and it is safe to do so.

Fire assembly points

Personnel shall assemble at the nominated Fire Assembly Point, RV1 or RV2, depending on the location and nature of the incident and the safest available route.

The fire marshal / roll-call controller shall account for employees, contractors, visitors and drivers as far as reasonably practicable.

The staff clocking in/out and visitor sign-in/out book shall be used to assist with confirming who is on site.

First-response firefighting

First-response firefighting shall only be attempted where:

- the alarm has been raised;
- the person is trained and competent to use the equipment;
- the fire is small and contained;
- the correct extinguisher or equipment is available;
- a safe escape route is maintained;
- there is no suspected battery thermal runaway, gas cylinder involvement, hazardous material involvement or stockpile involvement;
- the person is not placing themselves or others at unnecessary risk.

If there is any doubt, personnel shall withdraw, raise the alarm, evacuate and await emergency services.

Safety always comes first.

Onsite fire engines / fire appliances

The site has two Dennis fire engines / fire appliances located in the main car park for use as part of the site's emergency fire response arrangements.

The onsite fire engines are provided to support early intervention, boundary cooling, protection of nearby assets, support to hydrant use, and assistance to Northern Ireland Fire and Rescue Service where appropriate.

The onsite fire engines do not replace the requirement to raise the alarm, evacuate persons where necessary, and contact Northern Ireland Fire and Rescue Service.

Use of the onsite fire engines shall be restricted to trained and authorised personnel only.

The fire engines shall only be used where:

- it is safe to do so;
- the operator is competent and authorised;
- the incident has been reported to site management;
- emergency services have been contacted where escalation is possible;
- a safe route of access and egress is available;
- the activity does not expose personnel to smoke, toxic fumes, explosion risk, unstable piles, moving plant, electrical hazards, gas cylinders or battery thermal runaway.

The fire engines shall be subject to routine inspection and readiness checks. These checks shall be recorded and include, as applicable:

- access kept clear;
- fuel level;
- water availability;
- pump function;
- hose condition;
- nozzle condition;
- lights / warning equipment;
- battery condition;
- general serviceability;
- defect reporting.

Any defect affecting emergency readiness shall be reported immediately to site management and recorded.

Fire hydrants, extinguishers and mobile firefighting equipment

The site maintains fire extinguishers, fire packs, hydrants and mobile firefighting equipment at strategic locations across the site.

Fire equipment includes:

- foam extinguishers;
- dry powder extinguishers;
- CO_2 extinguishers;
- lithium-ion fire extinguishers;

- fire hydrants;
- hoses / fire packs;
- mobile 1,000-litre IBC with high-pressure pumps;
- onsite fire engines / fire appliances.

Fire hydrants and fire equipment locations are shown on the relevant site plan.

Firefighting equipment shall be inspected and maintained at suitable intervals. Defects shall be recorded and escalated.

Sprinkler, water injection and suppression arrangements

Sprinkler, water injection and suppression systems are installed, and shall be maintained as part of the site fire safety arrangements.

The purpose of these systems is to reduce fire risk, provide cooling, suppress fire spread or support process fire control within the specific area protected by the system.

The location, coverage and limitation of any sprinkler, water injection or suppression system shall be identified and communicated to relevant staff and NIFRS Rapid Response Vehicles (RRVs**)** or Officer Response Vehicles (ORVs).

Where the system relates to the shredder, downstream process, waste pile, building, conveyor or other specific plant area, this shall be clearly identified.

The system shall not be treated as a substitute for safe stockpile management, waste acceptance controls, battery removal, gas cylinder controls, hot works controls, inspection, housekeeping, alarm raising, evacuation or emergency service attendance.

Any defect, isolation, impairment or reduction in system effectiveness shall be reported immediately to site management. Temporary alternative controls shall be considered where the system is unavailable.

Inspection, maintenance and service records shall be retained on site.

Infrared camera / thermal monitoring arrangements

Infrared cameras / thermal monitoring systems are used, where installed, to assist with early identification of abnormal heat build-up within waste piles, stockpiles or other higher-risk material storage areas.

Thermal monitoring is an early-warning and prevention measure. It does not replace visual inspection, staff vigilance, stockpile control, battery controls, gas cylinder controls, hot works control or emergency response arrangements.

Where abnormal heat, temperature increase, smoke, vapour, steam, smouldering material or other signs of fire risk are identified, personnel shall:

1. Notify the Site Manager or supervisor immediately.

2. Review the affected area from a safe location.
3. Stop relevant activity where required.
4. Establish an exclusion zone if necessary.
5. Move or isolate the affected material only where safe and practicable.
6. Use the quarantine area where appropriate.
7. Escalate to Northern Ireland Fire and Rescue Service where there is any risk of fire spread, thermal runaway, stockpile involvement or loss of control.
8. Record the event in the site diary.

The site's thermal monitoring system includes 5 Dahua optical monitors with alarm thresholds. These shall be set at 60°C - 80°C for static waste piles, 95°C - 110°C for active traffic lanes and utilise a 30 – 60 second time-delay filter to prevent transient vehicle exhausts from triggering false alerts.

These thresholds shall be reviewed and maintained by competent persons.

Alarm events, faults and defects shall be recorded and investigated.

Loss of monitoring capability shall be reported to site management and considered during daily operational risk review.

Stockpile and waste pile response

In the event of smoke, fire, smouldering, abnormal heat or suspected combustion within a waste pile or stockpile, the Site Incident Controller shall assess the situation from a safe position.

Where safe and practicable, mobile plant may be used to:

- create separation;
- reduce fire spread;
- remove unaffected material;
- move suspect material to quarantine;
- expose hot spots for cooling;
- create access for emergency services;
- maintain fire breaks.

Mobile plant shall only be used where it is safe to do so, and operators are not exposed to unnecessary risk from smoke, flame, unstable piles, explosion risk, gas cylinders, batteries, poor visibility or emergency vehicle movements.

Where Northern Ireland Fire and Rescue Service is in attendance, material movement shall be coordinated with the Incident Commander.

Quarantine arrangements

The site shall maintain quarantine arrangements for hot, smoking, suspect, non-conforming or high-risk material.

The quarantine area shall be kept available and shall not be allowed to become a routine storage area.

Suspect material may include:

- hot loads;
- smouldering material;
- damaged batteries;
- suspected lithium-ion batteries;
- gas cylinders;
- aerosols;
- pressurised containers;
- contaminated ELV material;
- post-shredder material showing signs of heating;
- material identified by thermal monitoring.

Battery, gas cylinder and hazardous item controls

Batteries, gas cylinders, aerosols and pressurised containers shall be treated as significant fire and explosion risks.

Where discovered, they shall be removed from the general waste stream where safe, segregated and managed in accordance with site procedures.

Damaged, smoking, leaking, swollen or hot batteries shall be escalated immediately and shall not be treated as routine waste.

Gas cylinders and pressurised containers shall not be cut, crushed, shredded, heated or tampered with.

Drainage and firewater protection

The site drainage plan identifies drainage layouts, interceptors and discharge points.

In the event of a fire, site management shall consider the risk of contaminated firewater entering the drainage system.

Where safe and practicable, spill kits, drain protection, bungs, sandbags, booms, tankers or other temporary containment measures may be deployed to reduce pollution risk.

Protection of life and emergency responder safety shall take priority. Environmental protection measures shall be implemented where safe and practicable.

Any pollution risk or release shall be escalated to NIEA in accordance with site procedures.

Emergency service liaison

On arrival of Northern Ireland Fire and Rescue Service, the Site Incident Controller or nominated site liaison person shall provide relevant information, including:

- location of fire;
- materials involved;
- stockpile details;
- known battery or gas cylinder risk;
- hydrant locations;
- fire engine / fire appliance availability;
- access routes;
- drainage and interceptor information;
- fuel, oil and cylinder storage locations;
- plant available to move material;
- known hazards;
- persons accounted for or missing.

Clearway personnel shall support the Incident Commander with site knowledge but shall not direct emergency service operations.

Additional fire prevention and response measures

The site maintains additional fire prevention and response controls, including:

- monthly fire safety audits;
- weekly site inspections incorporating fire safety checks;
- no-smoking policy with designated smoking area;
- annual extinguisher servicing;
- annual hydrant pressure checks;
- trained fire marshals;
- waste acceptance checks;
- stockpile monitoring;

- battery removal and storage controls;
- gas cylinder and pressurised container controls;
- hot works control;
- plant pre-use checks;
- defect reporting;
- housekeeping and yard sweeping;
- maintenance of emergency access routes;
- availability of material handlers and loading shovels to move material where safe;
- site diary recording;
- investigation of fires, near misses and abnormal heat events.

Records

The following records shall be retained on site where applicable:

- fire drills;
- fire marshal training;
- staff fire training;
- extinguisher servicing;
- hydrant pressure checks;
- fire equipment inspections;
- fire engine / fire appliance checks;
- sprinkler / suppression system inspections;
- infrared camera / thermal monitoring checks;
- thermal alarm events;
- system faults and defects;
- stockpile inspections;
- quarantine events;
- hot works permits;
- fire incidents;
- near misses;
- regulator notifications;
- post-incident reviews;

- corrective actions.

Records shall be made available for inspection where required.