

Annex 6 - T9 Recovery of scrap metal

Part 1: Specific issues and proposed changes

	Issue detail	Rationale for change	Proposed changes
Annual waste acceptance	There is no annual waste acceptance.	T9 activities are often situated in small yards close to residential and other business properties.	Restrict to 500 tonnes per year.
Risks from combustible wastes	Scrap metal, especially any contaminated with oil, has been identified as a combustible waste.	All combustible wastes should have the some controls as identified in the Fire Prevention Plan Guidance to reduce and control the risk from fire relative to the size and risk of the exempt activity. Storage quantities are less than that of permitted sites and therefore not all the FPP requirements are needed.	No waste is stored longer than 12 months. 3 month storage limit for metal wastes that have oil contamination. 3 months for cable rubber, plastic and other non-metal wastes. Waste stacks and piles limited to 4m high. Limit to 500 m ³ total storage and 250 m ³ maximum stack size. Requirement to ensure access to all waste in case of fire.
Additional treatment activities being carried out under T9	Stripping and granulation often carried out already on these sites but not specified in the treatment activities.	The activity is useful and low-risk and is covered by the low-risk position LRP515. Adding it to the T9 means the position can be removed.	Stripping and granulation of cables added to the list of treatment activities. Separate storage conditions and quantity limits set for stripped cable and resulting plastic and rubber waste.

	Issue detail	Rationale for change	Proposed changes
Risks from specific types of waste Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified 191202 – Ferrous metals 191203 – Non-ferrous metals 150104 Metallic packaging	Metals segregated at MRFs are often not clean (containing contraries, plastics etc.) and can give rise to odour, flies and high Biological Oxygen Demand run-off Packaging waste can contain residues such as food and drink that are odorous and attract flies, or oil and chemicals that are highly polluting.	T9 activities are often situated in small yards close to residential and other business properties. Odour and flies are a particular nuisance and any activities involving these wastes should be carried out away from such properties and ideally in a building.	We propose removing codes 191202 and 191203 from this exemption. Keep 150104 but limited to only clean packaging.
Waste acceptance	Many sites accept wastes that are from prohibited sources as the operator finds it hard to understand the coding. This leads to problematic wastes being accepted. Many sites accept WEEE which is not permitted under this exemption.	Wastes cause issues such as odour, flies etc. There are specific handling and treatment standards for WEEE that mean that a permit is required.	Make the waste descriptions more explicit and state the sources of the waste. Make it explicit in the exemption title that WEEE is excluded. Exclude it in the list of activities.
Sealed drainage	Common issue when visiting sites is that the storage and treatment areas are not on sealed drainage.	This is a requirement but it is not worded clearly in the exemption.	Clarify requirement that all storage and treatment areas are on sealed drainage.

Part 2: Option 2 - Proposal

T9 - Recovery of scrap metal (excluding WEEE)

All	Current conditions				Changes proposed under Option 2			
Specified activities	Sorting, grading shearing by manual feed, baling, crushing. Cutting it with hand-held equipment. Associated storage.				Sorting, grading shearing by manual feed, baling, crushing. Cutting with hand-held equipment. Stripping and granulation of cables. Associated storage. Waste classified as WEEE is excluded.			
General site conditions applying to all waste.	Recovery is carried on at a location with sealed drainage.				All storage and treatment areas are on sealed drainage.			
Scrap metal	Waste codes	Annual acceptance (tonnes) / 7-day limit	Storage time and quantity limits	Other conditions	Waste codes	Annual acceptance (tonnes) / 7-day limit	Storage time and quantity limits	Other conditions
	02 01 10 15 01 04 16 01 17 16 01 18 19 12 02 19 12 03 17 04 01 17 04 02 17 04 0317 04 04 17 04 05 17 04 06 17 04 07 17 04 11	No annual waste acceptance specified. No weekly throughput specified.	No waste is stored longer than 24 months. 1000 tonnes on site at any one time. Total quantity of any cables stored or treated does not exceed 50 tonnes.	Height of any stack or pile does not exceed 5 metres.	02 01 10 15 01 0416 01 17 16 01 18 19 12 02 19 12 03 ¹ 17 04 01 17 04 02 17 04 03 17 04 04 17 04 05 17 04 06 17 04 07 17 04 11 20 01 40	500 tonnes per year.	No waste is stored longer than 12 months. 3 month storage limit for metal wastes that have oil contamination. 3 months for cable rubber and plastic and any other non-metal waste separated from metal. 500 m ³ on site at any one time. Maximum stack size 250 m ³ (27.5-225 tonnes - weight depending on metal type) on site at any one time.	Height of any stack or pile does not exceed 4m. Waste stacks must be accessible in case of fire. Where stored in containers each container must be accessible in case of fire.

¹ A crossed-through waste code indicates we are proposing not to keep it

All	Current conditions				Changes proposed under Option 2			
	20 01 40						<p>Stripped Cables – Maximum 25 m³ stored in container(s).</p> <p>Cable rubber and plastic covers when stripped and any other non-metal waste – Maximum 10 m³ stored in container(s).</p>	