Title:	**Noise Management Plan**
Report Reference:	**EM 01-007**
Client:	**Recovercyl**
Submitted To:	**Environment Agency**
Date:	**15-07-2026**
Main Contributor:	**Edward Bennett – AWSM Recycling Limited**
Report Issue History	***See Document Control Box in Section 2.2***

AWSM Recycling Limited / p: 01833 600859 / e: edward@awsmfarms.co.uk

1 Contents

2 Noise Management Plan

2.1 Document Scope & Objectives

This document provides the Noise Management Plan (NMP) for the Recovercyl (REC), waste storage, transfer and treatment facility.

REC are committed to seeking to minimise noise emissions from their facility to prevent negative impacts on identified sensitive receptors. This NMP is aimed at assisting REC in:

- Effectively managing potential noise releases associated with their normal operations.
- Minimising the risk of noise releases under abnormal operational conditions.
- Ensuring effective contingency systems are in place in the event of noise from site operations impacting on off-site receptors.

The objectives for this NMP are:

- Identify all possible noise sources at the facility.
- Outline the noise prevention control and mitigation measures employed on site.
- Ensure all operating conditions (normal, abnormal and emergency) are considered in evaluating the risk of noise release.
- Commit to monitoring of noise emissions to be pro-active in preventing impact on receptors.
- Reduce the risk of noise releasing incidents or accidents by anticipating them and planning accordingly.
- Describe the contingency arrangements in place to prevent or react effectively to noise releases.

2.2 Document Control

OMP -Document Control Box					
Revision Number	**Revision Issue Date**	**Revision Authorised by**	**Date submitted to Environment Agency**	**Date of EA response/comments & file location of correspondence**	**Revision Owner**
1	*15.07.2026*	*E Bennett*	*17.07.26*		

Notes:

- The table has been modified from the EA guidance document to make it more complete.
- 'Revision number' is same as 'Version number' which forms part of REC Environmental Management System (EMS).
- Revisions can be 'authorised' by any other member of the REC Management Team.

2.3 Site Description

The relevant details for the facility are:

Table 1.1: Installation Details	
Company Name	AIRE VALLEY GAS LIMITED

Table 1.1: Installation Details	
Site Name	Recovercyl
Site Address	Stanley Road, Bradford, England, BD2 1AS.
National Grid Reference	SE 15805 35466
EA permit reference	EPR/TP3129LT

2.4 Operations

The Site is to be Permitted to allow the storage, transfer and treatment of hazardous and non-hazardous wastes, in the form of gas cartridges / canisters and fire extinguishers. The main shift patterns are 7am-5pm (Mon-Fri) and 7am-1pm (Sat).

Note, gas cylinders are not treated on Site as these are repatriated to suppliers.

Wastes passing pre-acceptance checks are to be delivered to Site in well-ventilated metal caged IBCs on medium sized lorries. Upon passing pre-acceptance checks, wastes are unloaded in a waste reception area prior to transfer to dedicated waste storage areas as detailed on the Site Layout Plan.

All wastes will be stored under cover in a well vented location to ensure they are not subject to extreme temperatures, direct sunlight and to prevent rainwater collecting on the containers.

Waste treatment of gas cartridges on Site is limited to physical treatment of only those containers which contain residual gas / shown as empty on the container's contents gauge / determined by weighing. Full / or partially full containers will not be treated and will be bulked and sent off Site as the same waste code as assigned on arrival at the Site. This is to ensure that only minimal residual gas is released to atmosphere.

Physical treatment will be undertaken as follows:

Gas Canisters / Cartridges

- Depressurising of gas canisters by manual removal of the containers valve. This is limited to gas containers containing air or its constituents.
- Depressurising of gas cartridges through piercing of cartridges.

Fire Extinguishers

- Treatment operations permit the manual discharge of specific fire extinguishers into suitable containers.

Residual Wastes

- Empty casings and components are then divided into ferrous and non-ferrous metal types, to enable improved recycling options and stored in suitably sized containers prior to dispatch off Site.
- Separately collected fractions from the discharge of the fire extinguishers will be held separately and stored in suitably sized containers prior to dispatch off Site.

The Permitted yard area has an impermeable concrete surface. No wastes are tipped onto the surface, and all wastes delivered to Site are stored in metal caged IBCs on Spill Pallet Bunds.

2.5 Location

The facility is located within an industrial / commercial use area, c.2.5km North of the City Centre of Bradford. The immediate neighbours to the site comprise:

- North – Commercial Yard Area.
- East – Shrubland onto Residential Area.
- South – Commercial Unit / Yard Area.
- West – Commercial Unit.

A detailed sensitive receptor drawing and table is provided in EMS documents EM 05-002 Sensitive Receptor Schedule and the EM 06-001 Sensitive Receptor Plan.

2.6 Operating Hours

The main shift patterns are 7am-5pm (Mon-Fri) and 7am-1pm (Sat) via a secure lockable gated entrance. Waste materials can be on site 365 days of the year.

2.7 Permitting Requirements

The waste facility requires an Environmental Permit (EP) in order to comply with the Environmental Permitting (England and Wales) Regulations 2016, SI 2016/1154.

2.8 Relevant Guidance Documents

The following sector guidance documents, and their relevant BAT requirements, have been considered during the preparation of this NMP:

- Environment Agency Noise Management Plant Template, Final V1.2, 02/12/2025
- Environment Agency Guidance - Noise and vibration management: environmental permits- https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/noise-and-vibration-management-environmental-permits
- Environment Agency Guidance - Develop a management system: environmental permits - https://www.gov.uk/guidance/develop-a-management-system-environmental-permits;
- Environment Agency's Guidance – Non-hazardous and inert waste: appropriate measures for permitted facilities - https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities
- Environment Agency's Guidance - Chemical waste: appropriate measures for permitted facilities: https://www.gov.uk/guidance/chemical-waste-appropriate-measures-for-permitted-facilities

2.9 Who this plan is for

The following will be made aware of the details of this NMP:

- Environment Agency.
- REC Management Team.
- Contractors: where relevant.

REC Management will be required to read and have knowledge of the NMP as part of the facility's training requirements. Contractors will be made aware of relevant requirements of the NMP, as required, based on assessments by REC Management at the time of any relevant works or operations.

2.10 Maintenance and review of the NMP

Table 1.3: Document Control Requirements	
NMP requirements	**Response**
Who is responsible for the NMP and ensuring people are trained	Director Site Manager
Where is the NMP stored	Stored as part of the sites EMS Files in the following locations - • Hard copy located in the Site Office • Electronically within the Company's cloud system.
Document review requirements	Annual as a minimum, or following - • Planned change to infrastructure which impacts noise sources, generation or control, ***&/or*** • Significant noise release event/valid complaint escalation/ regulatory requirement.
Training for implementation of NMP	Training requirements are structured dependent upon job function and need. Training is specified within the EM 07-001 Training Matrix. In relation to the NMP, this training will comprise the following levels: • NMP details. • Noise monitoring. • Housekeeping. • Complaint response. A toolbox talk is given upon implementation and revision of the NMP to management teams. Records of toolbox talks are noted on management meeting minutes.
Training frequency	NMP training provided at issues and following revisions.
Organogram	A copy of current organogram is provided within document EM 05-003 Organogram.

2.11 Document Structure

This NMP is set out as follows:

- Identify relevant Sensitive Receptors.
- Identify all possible noise sources for normal/abnormal/emergency conditions.
- Overview of relevant Controls implemented.
- Incident response.
- Appendices containing relevant EMS documents.

3 Receptor Identification

3.1 Sensitive Receptors

The Noise Sensitive Receptor Schedule listed below details the identified sensitive receptors to noise within a 2 kilometre radius (unless otherwise specified) of the facility. Only the closest receptor in each direction is listed. The receptors listed are those identified within the full EM 05-002 Sensitive Receptor Schedule that are potentially sensitive to noise - i.e. may have human occupation or presence.

The following guidance has been used to identify the nearest sensitive receptors for the Facility:-

https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit#screening-for-protected-conservation-areas :

The nearest sensitive receptor means the nearest place to the permitted activities where people are likely to be for prolonged periods. This term therefore applies to dwellings (including any associated gardens) and to many types of workplaces. This term does not apply to a place where people are likely to be present for less than 6 hours at one time as being a sensitive receptor.

In addition, the term does not apply to those controlling the permitted facility, their staff when they are at work or to visitors to the facility, as their health is covered by Health and Safety at Work legislation, but does apply to dwellings occupied by the family of those controlling the waste facility.

The sources of information to identify all of the above are listed within the table notes.

Table 2.1: Summary of Noise Sensitive Receptors Identified

Nature of Receptor / Land Use	Direction	Approximate Distance from the Proposed Installation Boundary[1]	Plan Reference [2]
Industrial / Retail / Commercial Properties	N & W	c. 0.04 km	R1
Residential Properties	E	c. 0.05 km	R2
Industrial / Commercial Properties	S	c. 0.01 km	R3
Educational Facilities	W	c. 0.24 km	E1

Notes:

*: Closest receptor identified;

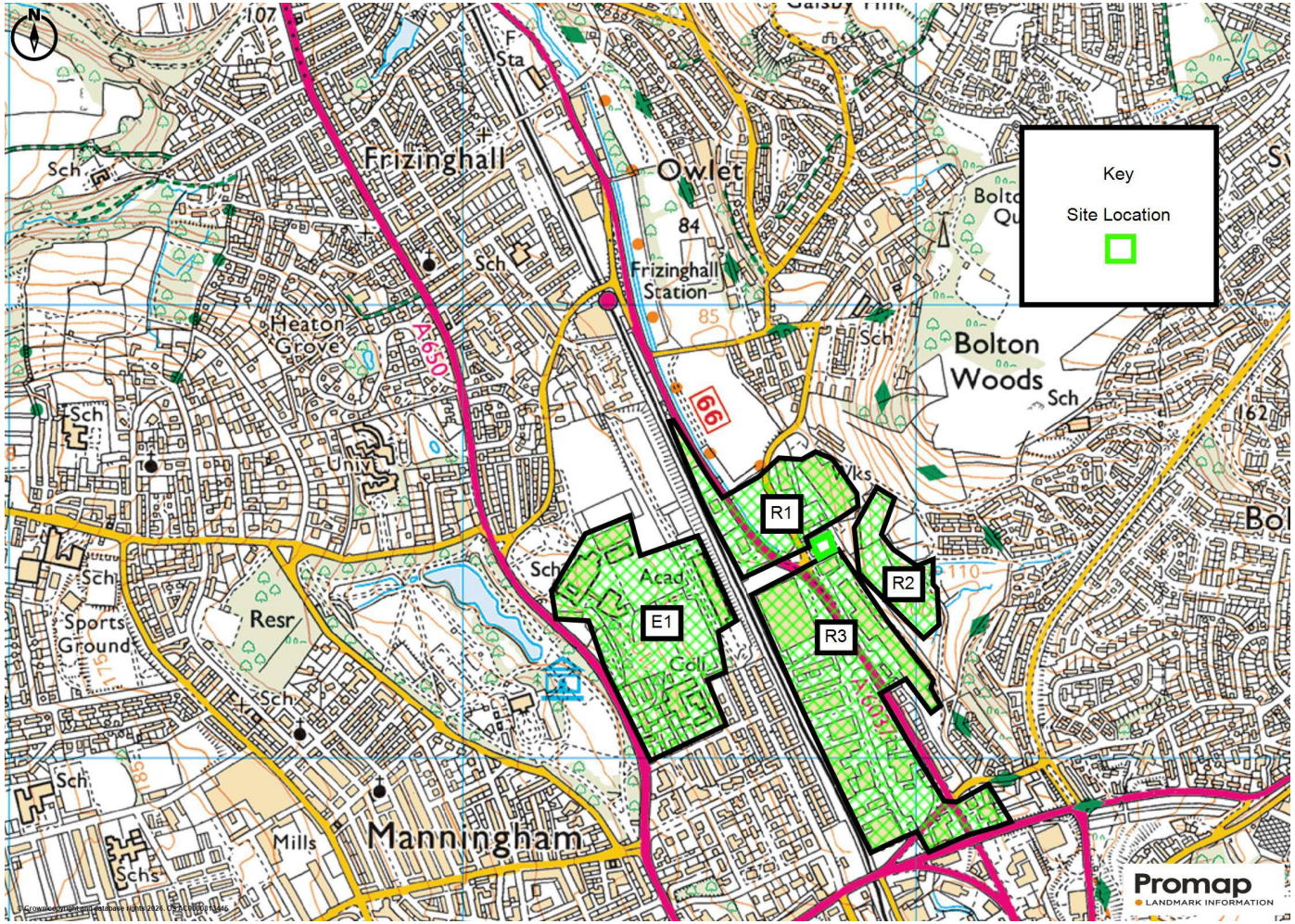
1: Distance shown measured using Ordnance Survey data provided by Promap to closest Identified Receptors;

2: Locations shown on Sensitive Receptor Plan in Section 2.3 below. OS mapping, provided by Promap, July 2026.

3.2 Third Party Noise Sources

Other noise sources identified in the area from online searches have been noted as follows:

- Industrial / retail and commercial operations.
- A650 major traffic route.



Drawing Title
Noise Receptor Plan
Scale
1:15,000
Version
1
Date Drawn
15-07-2026
Notes:

4 Potential Noise Source Identification

4.1 Noise Sources and Site Processes

The table below lists all of the potential noise sources that have been identified at the facility, together with mitigation measures in place and the residual noise risk rating.

Table 3 – Noise Assessment

Source	Contribution to Emissions	Description of the Expected Noise	Initial Risk at Receptor	Mitigation Measures / Risk Management	Residual Risk
Waste Arrival, Departures and Loading / Unloading	Medium	Loading and Unloading waste from vehicles.	Low to Medium	The following control measures apply to minimise noise from waste arrival, departures, loading and unloading: • The site will only operate in accordance with the approved hours of operation as set out in the planning consent. • Waste only delivered by Company owned vehicles. All vehicles are in good working order and subject to routine servicing and maintenance. • Wastes are unloaded by forklift truck. There is no tipping of waste. • Vehicle routes enforced to enable the sound management of traffic within the site. • Vehicle horns only used in case of emergencies. • Site speed limit of 10mph enforced. • Reverse warning indicators for site vehicles are directional i.e. white noise. • Reversing kept to an absolute minimum.	Low

Table 3 – Noise Assessment					
Source	**Contribution to Emissions**	**Description of the Expected Noise**	**Initial Risk at Receptor**	**Mitigation Measures / Risk Management**	**Residual Risk**
				• Toolbox talks/training are provided to all operatives in relation to noise management and the expectation to minimise noise as much as practicable. • Routine inspections of operations on site to ensure enforcement of minimising noise levels through the above measures undertaken by Site Management.	
General Activity in the Service Yard Area from Mobile Plant	Medium	Waste loading and unloading activities and forklift movements.	Low to Medium	The following control measures apply to minimise noise from the service yard: • The site shall only operate in accordance with the approved hours of operation as set out in the planning consent. • Ensure mobile plant is maintained in good working order, including noise control measures. • Vehicles switched off when not in use. • No power tools used on site. • No tipping of wastes on site. • Wastes manually placed in dedicated storage vessels. • Site surface is maintained in good order with no cracks or defects that would cause bangs and clatters to occur due to mobile plant movements. • Mobile plant trips minimised by determining efficient working practices.	Low

Table 3 – Noise Assessment					
Source	**Contribution to Emissions**	**Description of the Expected Noise**	**Initial Risk at Receptor**	**Mitigation Measures / Risk Management**	**Residual Risk**
				• Vehicles not revved excessively when manoeuvring in the yard. • Reverse warning indicators for site vehicles are directional i.e. white noise. • Vehicle horns not used except in case of emergencies. • Radios playing music not used externally. • Operatives equipped with personal radios to allow for communication between each other to avoid shouting occurring in the yard. • Toolbox talks/training provided to all operatives in relation to noise management and the expectation to minimise noise as much as practicable. • Routine inspections of operations on site to ensure enforcement of minimising noise levels through the above measures undertaken by Site Management.	

5 Controls

5.1 Introduction

Site management recognises that there are a number of potential noise sources on site and that without suitable controls in place, could potentially lead to noise emissions impacting on sensitive receptors.

A variety of controls are therefore in place at the facility and a discussion of on-site controls is provided below.

5.2 Deliveries and Collections

Deliveries and collections of waste materials are scheduled to ensure deliveries are made during working hours and to minimise the potential for vehicles left standing waiting to be unloaded / collect material.

EM 02-003 Waste Acceptance Procedure / EM 02-004 Waste Pre-Acceptance Procedures sets out that no ad-hoc deliveries of wastes are to be allowed on site and all wastes to be accepted have to pass pre-acceptance checks to ensure site can remain in compliance with the Permit. All deliveries are scheduled to prevent a back log of vehicles in the site yard.

5.3 Inspections and House Keeping

The EMS on site comprises site checks which include undertaking infrastructure integrity and housekeeping inspections on a regular basis to ensure that the site and relevant infrastructure is fit for purpose. Procedures implemented on-site in relation to housekeeping practises are detailed below:

- EM 01-005 Fugitive Emissions Monitoring Program (FEMP) and associated recording forms (EM 03-004 Site Inspection form): The FEMP ensures that infrastructure monitoring provides a robust mechanism to ensure that fugitive emissions to air, land and controlled waters are kept to a minimum. The inspection, testing and maintenance programme for pollution prevention infrastructure identified within the FEMP will ensure the continued integrity of the infrastructure and associated secondary containment. The inspections will ensure the yard surfacing is maintained in good order with no cracks or defects that would cause bangs and clatters to occur due to mobile plant movements.
- EM 02-003 Waste Acceptance Procedure: This procedure provides control of deliveries to site to ensure only pre-assessed wastes that are listed on the EM 05-008 Waste Schedule and have been fully considered as part of this Noise Management Plan are delivered to site. All other wastes will be rejected / quarantined.

5.4 Planned Preventative Maintenance

To further minimise the potential for noise emissions, Planned Preventative Maintenance (PPM) is undertaken on-site to cover relevant equipment, such as site Fork Lift Trucks and Delivery / Collection Vehicles. The PPM systems provide dedicated rolling schedules of maintenance and relevant record keeping ensured.

5.5 Noise Monitoring

Given the low potential for noise to impact on offsite receptors, the quantitative monitoring of noise from site operations will not be routinely undertaken.

During routine daily checks a subjective assessment will be made and any excessive noise, perceived by the inspecting member of staff, will be noted and reported to the site manager on the EM 03-010 Site Inspection Form so appropriate action can be taken.

More in depth monitoring may be carried out for the following reasons.

- In response to a complaint from the Environmental Agency, Local Authority, Staff Member and / or member of the public.
- Variations to site operations that could increase the noise potential of site operations.

5.6 Training

The training of all relevant staff is undertaken on a routine basis at the facility. Training relevant to noise control includes:

- Store delivery and collections.
- Housekeeping measures.
- Noise awareness and monitoring.
- Maintenance requirements.
- Record keeping.

All training is undertaken on a rolling programme for relevant staff identified by training schedules specific to roles and functions. The training programme includes refresher training and training for staff is documented using the EM 07-002 Training Record.

A toolbox talk is given upon implementation and revision of the NMP to management teams. Records of toolbox talks are noted on management meeting minutes.

5.7 Audit and Review

To ensure the effectiveness of the systems employed on site to control noise, prevent or minimise noise emissions from the facility, a system of auditing and reviews is in place. The aim is to review records and system documents, alongside the NMP, to identify areas for improvements, patterns of releases and the effectiveness of systems employed. Audits and reviews will be undertaken at the following frequency:

- At least annually.
- Upon receipt of verified complaints.
- Following concerns or issues identified by Regulators.
- Where significant change to site practices or infrastructure is planned.

Reviews will be documented on the EM 03-006 Audit and Document Review Form.

6 Incident Response

6.1 Introduction

Various levels of EMS controls are in place to deal with abnormal, emergency and contingency situations which may arise, including those relating to noise releases from the facility. These are summarised below within the NMP and also full copies of the relevant NMP related EMS documents are provided within Appendix 1.

6.2 Incident and Corrective Action

Any faults or deficiencies encountered on-site with regards to infrastructure and where procedures could not be carried out are detailed using an incident and corrective action reporting structure and recorded on the EM 03-001 Incident & Corrective Action Reporting Form. This will instigate appropriate level of management commitment to ensure corrective action is undertaken. A review of the corrective action will be included to ensure satisfactory completion and senior management sign-off. The system is embedded within the EMS and links to the Noise Management Plan and relevant EMS documents discussed below, ensuring that where an incident has occurred which could lead to Noise emissions, these are dealt with effectively and promptly with suitable corrective actions (immediate and long term) considered and instigated where appropriate.

6.3 Communications Procedure

A full copy of the facility's communications and complaints procedure EM 02-007 Communication & Complains Procedure is provided in Appendix 1.

The procedure deals with how to manage complaints and ensures that all relevant communications can be dealt with appropriately, including liaison with neighbours to allow for community engagement. The procedure outlines the requirements to communicate effectively with Regulators and any other interested parties and also internal staff.

6.4 Emergency Response

Recovercyl has a dedicated emergency response procedure EM 02-002 Emergency, Incident & Non-Conformance Procedure is provided in Appendix 1.

The procedure ensures that any noise complaints received at the facility are dealt with as a matter of urgency by a dedicated emergency response team, ensuring a full investigation and prompt response to the complainant &/or regulator. Records of all emergency response investigations will be kept and periodically audited.

Appendix 1: Relevant EMS Documents

Number	Title	Version Number	Issue Date
EM 01-005	Fugitive Emissions Monitoring Programme	Draft	Draft
EM 02-002	Emergency and Incident Procedure	Draft	Draft
EM 02-003	Waste Acceptance Procedure	Draft	Draft
EM 02-004	Waste Pre-Acceptance Procedure	Draft	Draft
EM 02-007	Communication and Complaints Procedure	Draft	Draft
EM 03-001	Incident and Corrective Action Report Form	Draft	Draft
EM 03-003	Complaint Handling Form	Draft	Draft
EM 03-004	Site Inspection Form	Draft	Draft
EM 03-006	Audit and Document Review Form	Draft	Draft
EM 05-002	Sensitive Receptor Schedule	Draft	Draft
EM 05-003	Organogram	Draft	Draft
EM 06-001	Sensitive Receptor Plan	Draft	Draft
EM 07-001	Training Matrix	Draft	Draft
EM 07-002	Training Records	Draft	Draft

Purpose

The purpose of the Fugitive Emissions Monitoring Programme (FEMP) is to ensure that infrastructure monitoring provides a robust mechanism that ensures fugitive emissions to land, sewer and controlled waters are kept to a minimum.

After periodic review and, where necessary, amendments to the inspection, testing and maintenance programme for pollution prevention infrastructure at the installation will be made to assure their continued integrity.

Fugitive Emissions Monitoring Programme

The FEMP will be incorporated into the facility's Environmental Management System (EMS). The FEMP Schedule outlines the frequency of inspections and monitoring.

Audits and review of the monitoring programme may lead to revisions of the monitoring plan in terms of frequency and the level of detail required. FEMP monitoring records will be kept for the Environmental Permit lifetime.

The FEMP incorporates the elements listed below and, where deficiencies are found, these will be reported on the Incident and Corrective Action Report Form. This will ensure deficiencies are rectified by instigating the appropriate level of management involvement and ensuring corrective actions are implemented.

The inspection and maintenance of operational equipment and process machinery, whose failure could have an impact upon the environment, will be covered by the Planned Preventative Maintenance system on site.

Waste Vessels

The site uses dedicated containers and skips for storing waste materials. At the receipt point onto site and during the period they are on site, these vessels will be inspected for signs of deterioration, damage and leaks. Where deficiencies are encountered these will be reported using the incident and corrective action structure and repairs instigated.

Underground sumps

The underground sumps will be inspected to ensure that no leaks are occurring. The checks will involve the emptying, cleaning and integrity testing of the structures. Where deficiencies are encountered these will be reported using the incident and corrective action structure and repairs instigated.

Secondary Containment / Spill Kits

Secondary containment will be inspected for signs of deterioration, damage and leaks. Spill kits will be monitored to ensure they remain in their designated locations and have been replenished after use. Where deficiencies are encountered, these will be reported using the incident and corrective action structure and repairs instigated.

Hard Standing Inspection

The hard standing will be inspected to ensure that its integrity is not being compromised as part of the yard inspection. Where deficiencies are encountered these will be reported using the incident and corrective action structure and repairs instigated.

Housekeeping

All operators are reminded to keep a tidy work area. In particular to ensure that waste operations are carried out inside the relevant buildings as far as practicable and that building doors are kept shut other

than for the delivery and despatch of materials.

All site areas will be inspected to ensure they are kept clean and tidy to minimise potential for the build-up of unwanted combustible materials / litter / pest and vermin.

Inspection will be carried out by operators during their normal work and will be supplemented by management team members walking the site at least twice daily. The results of the inspection will be recorded on the site inspection form.

Where deficiencies are encountered these will be reported using the incident and corrective action structure and site cleaned / tidied to a satisfactory level.

Deliveries & Collections

All material deliveries and collections will report to the site office upon arrival at site. Drivers are then directed to the appropriate area of the site. Spill kits are present at site on strategic locations.

Spill kits will be checked as part of the site inspection for need of replenishment. All staff designated the responsibility for supervising unloading will be adequately trained in the relevant EMS procedures.

Corrective Action Structure

Any faults or deficiencies encountered by the monitoring programme will be detailed within the Incident and Corrective Action Report Form. These documents will instigate the appropriate level of management commitment to ensure any repairs are commissioned and undertaken. A review of the corrective action will be included to ensure satisfactory completion.

Training

Personnel responsible for the inspection, testing and maintenance of pollution prevention infrastructure are to be trained to an appropriate level to ensure compliance with the infrastructure monitoring programme.

1. Purpose:

- Prevent and mitigate the environmental impacts associated with emergency, incident and near miss situations. The definitions of emergency / incident and near miss are provided within the EM 01-004, Environmental Accident Management Plan.
- Ensure appropriate investigation and corrective action for non-conformances in relation to environmental matters. For this facility it has been determined that a Non Conformance Situation is a non fulfilment of a requirement within the Environmental Management System.
- Ensure appropriate investigation and corrective action upon receipts of complaints regarding activities or emissions at the facility from public, regulator or other interested parties.

2. Procedure:

In the event of an environmental emergency or incident:-

I. Whilst following site safety rules and safety procedures at all times, where safe to do so, it is the responsibility of the member of staff witnessing the event to:
   a. Inform a member of Site Management;
   b. contain the incident and prevent further spread, &/or;
   c. turn off the supply of the material at its source, &/or;
   d. If feasible contain the discharge and prevent it from entering drains or water courses using the spill kits provided;
   e. The staff member is responsible for shutting down any equipment and plugging the emission point if possible

II. Where the situation is unsafe, immediately contact Site Management, who will contact all relevant authorities detailed on the Emergency Contact List and follow any instructions given by the authorities;

III. The member of staff dealing with the event will try to contain the discharge and prevent it from entering water courses using the spill kits provided following the EM 02-012 Spill Control Procedure;

IV. Site Management will note the type of material involved, approximately how much was released into the environment and all receiving receptors;

In the event of an emergency fire, serious accident, natural disaster, explosion, or any other such emergency, the alarm should be raised as follows:

- Dial 999;
- Give the nature of the emergency, i.e. fire, etc;
- Give the location of the emergency;
- Give your name;
- Sound alarm.

On hearing the evacuation siren, all employees, visitors and contractors must:

- Stop work immediately;
- Leave immediately by the nearest exit point and follow the designated route which will have signs;

- Do not stop for personal belongings;
- Go to the designated assembly point and report to your Manager;
- All visitors are the responsibility of their host and should assemble at the assembly point;
- Await instructions from the site management;

V. Site Management will contact all relevant authorities detailed on the Emergency Contact List, as necessary, and follow any instructions given;

VI. Site Management will complete an Incident & Corrective Action Report Form (EM03-001) and ensuring corrective actions are instigated where required.

VII. Site Management is responsible for assessing the situations and reviewing the Incident and Corrective Action Form immediately to determine what actions are needed and whether notification is required to the Environmental Agency.

Following a Near Miss:-

I. Inform a member of Site Management;
II. Where appropriate render the area safe;
III. Complete an Incident & Corrective Action Report Form (EM 03-001);

Following an Internal/ External Audit Non Conformance:-

I. Inform a member of Site Management;
II. Complete an Incident & Corrective Action Report Form (EM03-001)
III. Review Non Conformance records in Site Management meetings.

Following a Complaint:-

I. Inform a member of Site Management;
II. Follow the Communication and Complaints Procedure (EM02-007);
III. Complete an Incident & Corrective Action Report Form (EM03-001);
IV. Review Complaints records in the Site Management meetings.

Testing and Updating:-

Site Management are responsible for the implementation, testing and updating of the incident, emergency and non-conformance procedure.

Site Management are also responsible for adapting this procedure in order to meet site / services specific needs and ensuring that all relevant staff are aware of the procedure.

1. Purpose:

Control the delivery of waste streams to site.

2. Procedure:

Pre-Waste Acceptance

I. Prior to any new waste streams being delivered by site staff or contractors to site, the EM 02-004 Waste Pre-Acceptance Procedure is to be followed to ensure the waste can be accepted at site and processed in accordance with the site's permit.

Non-Hazardous Waste Streams

I. Upon collection / delivery of the waste stream to site, the site operative will ensure a Waste Transfer Note (WTN) is completed or a WTN Season Ticket is in place, WTNs / Season Tickets need to provide the following information:

WTN requirement	Example info to provide / Guidance on what is expected
Origin of the waste	Address where the waste has come from
Quantity	Quantity to be accepted on site e.g. 10 tonnes, 1 lorry load.
Transport Date	Date of collection and removal from origin site.
Carrier Details	The name of the Waste Carrier company
Recipients Details	The name of the Waste Receiver
Waste Description	Description of the waste being accepted on site, e.g. cardboard.
EWC Codes	European Waste Catalogue codes – List of Waste code associated to the waste stream.
Handling Requirements	Details of any specific handling requirements related to the waste stream.
Packaging/Storage Arrangements	Details of any specific packaging and storage requirements related to the waste stream.
Signed by Site of Origin and Carrier	The WTN should be signed of by the waste producer and carrier.
Confirmation of / details on the waste hierarchy consideration for the treatment / disposal option	This is a tick box which must be completed by the producer of the waste.
The Standard Industry Code (SIC) for the Company the waste has been collected from. This is to be taken from the 2007 SIC list.	The waste producers SIC as listed in the 2007 SIC list.

Hazardous Waste Streams

I. Prior to acceptance of hazardous waste stream loads on site, the EM 03-007 Hazardous Waste Consignment Form will be completed. A copy of the completed record will be provided to the site operatives;

II. Upon collection / delivery of the waste stream to site, the site operative will ensure the consignment of waste is as per the detail provided on the EM 03-007 Hazardous Waste Consignment Form and the Consignment Note inspected to ensure it provides the following information:

CN requirement	Example info to provide
Consignment Note Code;	The format for the consignment note code must be 'XXXXXX/YYYYY. The 'XXXXXX' is the first 6 letters/numbers (not symbols or spaces) of the name of the waste producing company entered in part A2 of the consignment note and must be followed by '/'. 'YYYYY' is exactly 5 numbers or letters (not symbols or spaces) the waste producing company has chosen to reference the load with. An additional letter at the end of the consignment note code for certain types of consignment may have been added: a 'V' for waste removed from ships - 'XXXXXX/YYYYYV' an 'F' for fly-tipped waste - 'XXXXXX/YYYYYF' a 'D' for waste moving under a consignee return derogation - 'XXXXXX/YYYYYD' a 'P' for continuous piped waste,
Producer details;	Name, address, postcode, telephone, email, facsimile of the producer. They may only omit telephone, email or facsimile if you do not have them - in which case they should have entered 'N/A'
Waste will be taken to (Consignee);	You must enter site details here - name, address and postcode.
Waste Arising Process;	***For example***, maintenance
The SIC for your Company from the 2007 list)	The producer must provide a full written description and the Standard Industrial Classification SIC 2007 code of the process that created the waste.
EWC Code;	See European Waste Catalogue
Quantity;	**This has to be in kilograms (kg)**
Physical Form;	Liquid / Solid / Gas / Powder / Sludge / Mixed
Chem. & Bio Constituents;	***For example,*** "cleaning chemical name" – 20% caustic.
Hazard Codes;	Specify the appropriate codes - H1-H15
Container Type/ No.;	***For example***, 6x205 litre drums
Carrier Name & Address;	The name & address of the Waste Carrier company

CN requirement	Example info to provide
Registration No.;	Waste Carriers registration number – for them to provide
Reason for Exemption if applicable;	Waste Carrier to provide information
Confirmation of waste hierarchy consideration	This is a tick box which must be adhered to. Your Managing Director will have the records to ensure it has been complied with
Sections on :- 'UN identification number(s)', 'Proper shipping name(s)', 'UN Class(es)', 'Packing group(s)' and 'Special handling requirements'	The consignment note must give these details **if the waste is 'dangerous for carriage'**. **This responsibility falls to the carrier of dangerous goods**, whether they move them for themselves or for some other person or business. However, if the waste moves under a contract for carriage, the consignor named in the contract takes responsibility. Be aware the term 'consignor' may be different from that used for the Hazardous Waste Regulations. You can get more information on carriage of dangerous goods from Health and Safety Executive website http://www.hse.gov.uk/cdg/manual/index.htm.

Accepted Loads of Wastes

I. All loads accepted on site will be directed to the appropriate unloading area on site, unloaded and stored in line with the EM 02-006 Waste Storage Procedure;

II. Site Management will maintain an inventory of the volumes of wastes held on site. This inventory will maintain a 'live' balance of the volumes held, to ensure site operate within permitted limits;

III. Loads of hazardous wastes are to be labelled. The labels will specify the date the load arrived, customer ID, consignment note reference, waste inventory number, EWC code, associated waste description and the weight of the load.

Non-Conforming Loads

I. Non-conforming loads arriving at site will either be rejected or be sent to an isolation area for quarantine;

II. For reject loads of Hazardous Waste – See EM 02-008 Hazardous Waste Rejection Procedure.

III. Where loads are returned to the sender the supplier of the waste will be informed in writing and asked to provide results of their investigation into the circumstances of the delivery.

IV. If waste streams arrive on site which the facility is not licensed to accept and are not returned to sender, site will send the waste to an appropriate facility for disposal or recovery.

V. Records of non-conforming waste received / identified at site and the action taken to remove the waste from site, will be detailed using the Incident and Corrective Action Report Form.

3. Records:

Copies of the records detailed below will be held in the Site Office.

Record	Records Held for a Minimum Of
Non Hazardous Written Waste Information	Two Years
Hazardous Wastes Consignment Notes	5 years
Carrier Schedule	Permit Life Time
Hazardous Waste Site Inventory	Permit Life Time
Consignee / EA Waste Returns	Permit Life Time

1. Purpose:

Outline the steps to be taken in order to prevent the acceptance of unsuitable / unpermitted wastes at site.

2. Procedure:

I. For all new waste streams to be accepted on site, the following information needs to be assessed and recorded. This detail is required in order to demonstrate that the waste can be accepted at site and processed in accordance with the site's permit.

- List of Waste Code of the waste stream against the sites list of acceptable waste;
- The type of process producing the waste;
- The specific process from which the waste derives;
- The quantity of waste to be accepted against permitted limits;
- Where applicable - chemical analysis of the waste (individual constituents and as a minimum their percentage compositions);
- The form the waste takes (solid, liquid, sludge etc);
- Hazards associated with the waste;
- Description and costing of proposed processing method and onward recovery / disposal route;
- Review of existing EMS documents including the Fire Prevention Plan to ensure all environmental risks associated with the waste stream are suitably controlled if brought onto site.

3. Records:

All records relating to waste pre-acceptance checks to be kept for a minimum of 3 years.

1. Purpose:

To manage all communications in relation to regulatory authorities, interested parties, staff and environmental complaints.

2. Procedure:

Complaints

I. Staff receiving complaints via the telephone or in person will record the complaint on a Complaints Handling Form (EM 03-003).

II. Complaints Records together with letters of complaint or communication from authorities will be passed on to Site Management.

III. Site Management will determine if a complaint requires immediate action, including communication with the relevant authorities. If not the complaint will be reviewed by the management team to determine if it is a justified complaint. In either case the Complaint Record will be completed by Site Management.

IV. If a definite cause for the complaint is identified corrective action will follow as detailed within the Complaint Record.

V. The implementation of the corrective action will be reviewed by Site Management and the Complaint Record signed off on successful completion. The complainant will be notified of the changes made and the complaint will be deemed to be resolved.

VI. Where no specific cause can be found regarding the complaint, Site Management will monitor the particular issue for recurrence and a response will be issued to the complainant and the matter deemed to be resolved.

VII. In all cases management will aim to provide information to the complainant within 48 hours of receiving the complaint, even if this is to inform the complainant that investigations are still ongoing.

Regulators

I. Formal reporting required by the Environmental Permit will be submitted to the EA in accordance with the Environmental Permit.

II. For the following situations, the EA must be notified without delay by Site Management:-

- Any breach, or known imminent breach, of a Permit Condition;
- Any occurrence / incident as defined in the Environmental Accident Management Plan, and specifically:-
  - "the detection of any malfunction, breakdown, or failure of equipment or techniques, accidents or fugitive emission which has caused, is causing or may cause pollution"
  - "the breach of a limit specified in the Permit"

- “any significant adverse environmental effects”

- Receipt of a valid environmental complaint (eg, odour).

III. Immediate notification to the EA should be by telephone using the details in the Emergency Contact List;

IV. For all situations stated in II above, written communication using the EM 04-001 EA Report Form should be provided within 24 hours of site being aware of the issue, unless otherwise agreed in writing with the EA site inspector;

V. The Part B section of the EA Notification Form should be issued to the EA with all necessary supporting documents within a timeframe agreed with the EA.

VI. All other communications with Regulators should be made or confirmed in writing and kept on record.

Location on Site:		**Date & time of Incident:**	
Team / Staff involved:			
Incident / Non Conformance / Complaint *(Delete as appropriate)*			
1. What happened?		**2.** What caused it?	
Member of Site Management (SM) informed: **Name:**		**[***Tick***] ☐.**	
3. Immediate Correction required / taken			
Designated SM / staff member to deal with incident resolution			
Corrective Action Required	Yes/No	**Implemented by:**	
4. Is an EA notification required to be sent to the Environment Agency?		**Yes*** / No ***EA Notification Form ref:**	
Incident report signed by Director or SM:		**Date:**	
5. Corrective action			
Target date corrective action to be completed:			
Corrective action agreed & signed by Site Management:		Date:	
Corrective action confirmed as completed by:		Date:	

EM03-001 Incident & Corrective Action Form - Guidance

AS SOON AS YOU HAVE COMPLETED THE FORM, HAND IT IMMEDIATELY TO A MEMBER OF SITE MANAGEMENT

Related Procedures

For further clarification, definitions or details please refer as necessary to:

- EM 01-004 –Environmental Accident Management Plan
- EM 02-002 – Emergency, Incident & Non-conformance Procedure
- EM 02-012 – Spill Control Procedure
- EM 02-007– Communications and Complaints Procedure

Form - ***Page 1 guidance notes***

Note, where necessary, when completing the form overleaf, continue on separate sheet if necessary & add Incident Date, Time and your Name to each page. Attach any further sheets to this one.

Section of form		Guidelines
1	Incident (includes permit beaches, spills and leaks)	Description of the environmental emergency, incident or near miss. Refer to EM 02-002 if required. Please detail what happened including, **as appropriate**, what & how much material was involved, where did the material go, who was involved, equipment/machinery involved, materials lost, detail emissions that went off site, who was contacted and any other information you consider relevant.
	Non-conformance	If the issue relates to a non conformance with the EMS – detail the errors in "what happened" (could include: not following procedures, incorrect completion for forms, errors on schedules, issues identified by audits)
	Complaint	Upon on receipt of a complaint relating to environmental issues (e.g. noise/dust/odour/litter) – provide the following details in "what happened":- name of complainant; date and time of complaint; contact details for complainant; location of complaint; description of complaint. Also add weather conditions at time of complaint (temp, wind speed and direction, cloudy/raining), activities on site that might relate to complaint (eg delivery of waste materials to field storage tank). Where appropriate, include actions required and record of feedback to complainant.
2	What caused it	This should attempt to identify what is the **root cause** of the issue that has been listed in the "what happened" section
3	Immediate correction	Detail what action was taken, what procedures were followed
4	EA Notification requirements	EA to be informed without delay following the detection of any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution. Written confirmation to be provided to the EA using EM 04-001 within 24 hours of the issue being identified.
5	Corrective Action	Provide a description of corrective actions to be undertaken, resources required, desired outcomes following implementation of actions

(Add further details on Incident and Corrective Action Report Form (EM 03-001) if necessary and staple to this form)

Admin Details	
Staff Member Completing the Form	**Today's Date**
Complaint References / Identifiers[1]	**Time and Date of Alleged Environmental Issues**
Type of Complaint/s - Odour / Noise / Dust / Flies / Other	
Complainants Descriptions[2]	
Detail Weather Data at Time Closest to Complaint (Wind Direction / Wind Speed / Temperature)	
Initial Evaluation / Response to Complaint/s	

Further Action Details		
Action Taken - One of 1 or 2		**Reasoning / Document Reference**
1	No Further Action Required	*Ensure sufficient written justification is provided above or cross referenced to –*
2	EM 03-001 Incident and Corrective Action Form[3]	

Feedback	
If requested – details of correspondence sent to provide feedback to the Regulator / Complainant if requested?	Copy of this form emailed to EA.

Notes –

1 - Use the Environment Agency's National Incident Report Number for all Complaints received from the EA

2 – Take detail from written correspondence / add notes from telecon

3 – The EM 03-001 will detail if a Schedule 5 Notification is required to be provided to the Environment Agency.

4 - All complaints to be logged onto our central record & this completed Complaint Handling Form will be stored electronically or in hard copy with copies of all written correspondence associated to the complaint/s.

RECOVERCYL	Environmental Management System		
	EM 03-004 SITE INSPECTION FORM	Version No:	1
		Issue Date:	draft
		Page 1 of 1	

Area	Perimeter fence / spill kerbs	Site surfacing	Drainage (obvious blockages / damage to sump)	Evidence of Noise Nuisance?	Other problems noted (e.g. litter / spills / leaks / physical damage / full vessels / gas bottle cage secure / mud and dust)
Week Commencing:					
Monday					
Tuesday					
Wednesday					
Thursday					
Friday					
Week Commencing:					
Monday					
Tuesday					
Wednesday					
Thursday					
Friday					
Week Commencing:					
Monday					
Tuesday					
Wednesday					
Thursday					
Friday					

Notes

1. Tick or Initial box each day if no problems found.
2. Where problems found, note any defects in the box & / or below and inform site management. Refer to Incident and Corrective Action Report form.
3. Dust impact is when dust and particles are visibly suspended in the air and tracking towards or have gone over the site boundary.

RECOVERCYL	Environmental Management System		
	EM 03-006 AUDIT & DOCUMENT REVIEW RECORD FORM	Version No:	1
		Issue Date:	draft
		Page 1 of 1	

Note: When completed this form becomes a record stored in EM 08-004 Audit & Document Review Records

Internal audit/review report

Date of Audit / Review:

Auditor(s) / Reviewers:

Site Management member(s) present:

Description of areas covered by audit / review:

Audit / Review findings

Item no.	Item Description	Current Status	Findings (Errors / Weaknesses / Best Practice Examples)	Improvements / Actions Required	Timeframes & Responsibility for Improvements	Date Actions / Improvements Completed
Date Audit / Review Issued to Site:						

Table 1 below details sensitive receptors identified within a 2-kilometre radius (unless otherwise specified), of the proposed site boundaries. For clarity only the closest receptor in each direction is listed.

Table 1 - Sensitive Receptors			
Receptor Classification	**Compass Direction**	**Approx Distance from the Proposed Installation [1]**	**Plan Reference[2]**
Human Occupied Receptors (within 1 km)			
Residential / Industrial / Commercial / Offices	N & W	c. 0.04 km	R1
	E	c. 0.05 km	R2
	S	c. 0.01 km	R3
Educational Facilities.	W	c. 0.24 km	E1
Habitat Receptors[3]			
Ramsar (England) (within 5km).	None identified within 5 km.		
Trench Meadows SSSI - SSSI (England) (within 5km).	NW	c. 4km	Not marked on plan due to distance from site.
Special Areas of Conservation (England) (within 5km).	None identified within 5 km.		
Special Protection Areas (England) (within 5km).	None identified within 5 km.		
Local Nature Reserve (England).	None identified within 2 km.		
Ancient Woodland.	NW	1.45km	H1
Priority Habitat Deciduous Woodlands	NW	0.29km	H2
	E	0.19km	H3
Water Resource Receptors (within 1 km)			
Bradford Beck.	W	c. 0.09km	W1
Land Drain.	SE	c. 0.23 km	W2
Land Drains.	S	c. 0.27 km	W3
Ground Water[3].	The site is located on a Secondary Aquifer.		
	The site is not within a Source Protection Zone or a Drinking Water Safeguard Zone or a Nitrate Vulnerable Zone.		
Flood Risk.	Flood zone 1 = Locations in flood zone 1 have a low probability of flooding. This means in any year land has a less than 0.1% chance of flooding from rivers or the sea		

Table 1 - Sensitive Receptors			
Receptor Classification	**Compass Direction**	**Approx Distance from the Proposed Installation [1]**	**Plan Reference[2]**
Other Receptors			
Highways and Transportation[4].	W	c. 0.03 km	T1
Air Quality Management Areas[5].	Site is not located within an Air Quality Management Area.		
Scheduled Monuments (within 1km).	None identified within 1 km.		

Table Notes:

*: Closest receptor identified from the proposed Permit Boundary.

1: Distance shown measured using Ordnance Survey data provided by Promap.

2: Locations shown on Sensitive Receptor Plan within document Ref REC-R05-F1– Site Drawings.

3: Habitat / Groundwater Source Protection Zones areas identified using the MAGIC Website, May 2025.

4: Closest local road network only.

5: AQMA locations reviewed through DEFRA's website – May 2025.

Director / TCM
Chris Southern

↓

↓

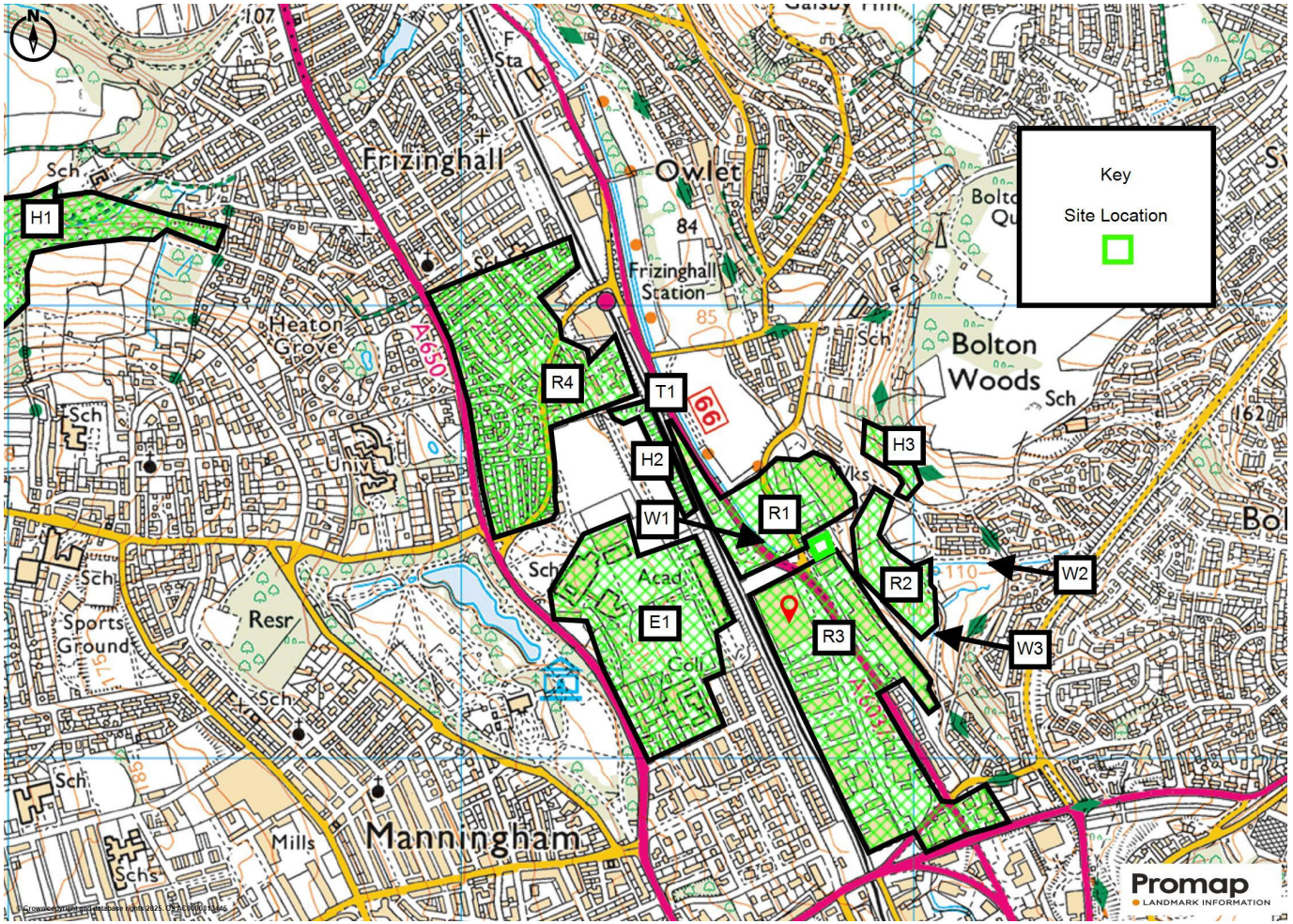
Operations /
Transport Manager
Charles Southern

↓ ↓

Reception / Yard Operatives

Admin

RECOVERCYL	Environmental Management System		
	EM 06-001 SENSITIVE RECEPTOR PLAN	Version No:	1
		Issue Date:	draft
		Page 1 of 1	



Drawing Title
Sensitive Receptor Plan
Scale
1:15,000
Version
1
Date Drawn
15-12-2025
Notes:

Number	Title	Director / TCM	Site Manager	Operatives / Drivers
EM 00	EMS Index	✓	✓	
EM 01-001	Environmental Policy	✓	✓	-
EM 01-002	Organisational Structure and Responsibilities	✓	✓	-
EM 01-003	Environmental Accident Management Plan	✓	✓	-
EM 01-004	Site Closure Plan	✓	✓	-
EM 01-005	Fugitive Emissions Monitoring Programme	✓	✓	-
EM 01-006	Fire Prevention Plan	✓	✓	-
EM 01-007	Noise Management Plan	✓	✓	-
EM 01-008	Planned Preventative Maintenance System	✓	✓	-
EM 01-009	Climate Change Adaptation Risk Assessment	✓	-	-
EM 02-001	Overarching Procedure Requirements	✓	✓	✓
EM 02-002	Emergency, Incident & Non-conformance Procedure	✓	✓	✓
EM 02-003	Delivery and Collection Procedure	✓	✓	✓
EM 02-004	Waste Pre-Acceptance Procedure	✓	✓	✓
EM 02-005	Waste Acceptance Procedure	✓	✓	✓
EM 02-006	Waste Storage Procedure	✓	✓	✓
EM 02-007	Waste Procedure	✓	✓	✓
EM 02-008	Hazardous Waste Rejection Procedure	✓	✓	✓
EM 02-009	Communication and Complaints Procedure	✓	✓	-
EM 02-010	Fuel and Chemical Storage Procedure	✓	✓	-
EM 02-011	Spill Control Procedure	✓	✓	-
EM 02-012	New Projects Procedure	✓	✓	✓
EM 03-001	Incident and Corrective Action Report Form	✓	✓	-
EM 03-002	Site Inspection Form	✓	✓	-
EM 03-003	Complaints Record	✓	✓	-
EM 03-004	Audit and Document Review Form	✓	✓	-
EM 03-005	Document Control Update Record	✓	✓	-
EM 03-006	Hazardous Waste Consignment Form	✓	✓	✓
EM 04-001	EA Report Form	✓	✓	-
EM 05-001	Emergency Contact List	✓	✓	✓
EM 05-002	Waste Schedule	✓	✓	-
EM 05-003	Sensitive Receptor Schedule	✓	✓	-
EM 06-001	Sensitive Receptor Plan	✓	✓	✓
EM 06-002	Environmental Accident Management Plan	✓	✓	-
EM 06-003	Site Storage and Layout Plan	✓	✓	-

Number	Title	Director / TCM	Site Manager	Operatives / Drivers
EM 06-004	Site Boundary Plan	✓	✓	-
EM 06-005	Permit Sensitive Receptor Plan	✓	✓	-
EM 07-001	Training Matrix	✓	✓	-
EM 07-002	Training Record	✓	✓	-

Title of Training:					
Print Name	**System documentation included in training**	**Document version and issue date**	**Date of training**	**Trainee signature to confirm they have fully read and understand implications of the documentation.**	**Satisfactory completion? Management or Trainer to sign**