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Environmental Management System

v1.0

Environmental and sustainability solutions provided to
Haworth Scouring Company Limited



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1.0 INTRODUCTION

This Management System has been prepared in accordance with the Environmental Permitting Regulations 2016 and sets out the considerations and operational details that are relevant to the operation of a small-scale Anaerobic Digestion (AD) facility operated by Haworth Scouring Company Limited (hereon referred to as HSC) at Bradford, West Yorkshire. It details the nature of the site, relevant site and infrastructure works, methods of operation and environmental controls.

2.0 SITE DETAILS

2.1 Site Address

Cashmere Works
Birksland Street
Bradford
West Yorkshire
BD3 9SX

2.2 Operational Location

Site Grid Reference: Easting: 417900, Northing: 432700

2.3 Site Description

The site is situated 1.3km east of Bradford city centre and comprises an irregular area of approximately 8 acres. The site is surrounded by mixed industrial units and some residential properties. The facility is surrounded by minor roads on four sides, with the fifth (south) side being the boundary of main Leeds-Bradford railway line. The north side of the site is bounded partly by Gibson Street, with residential housing on the opposite side. The east side of the site is bounded by the end of Laurel Street which has industrial premises on its opposite side. The south and west sides of the site are bounded by Birkshall Lane and Birksland Street respectively, both of which are largely used by industrial traffic only. The whole site is surrounded by perimeter or building walls and slopes distinctly to the northwest.

The installation is a textiles plant which washes and dries raw fleece wool to produce clean, dry wool fibre for sale or onward processing. The main activities are receipt of raw materials and fuels, product processing (heating, drying, washing, and cleaning) and dispatch of finished product. Ancillary processes include on-site treatment of effluents and recovery of wool grease.

2.4 Plans

Reference Drawings: Anaerobic Plant Plan 2530-08E Proposed plan-Model
Site Boundary Plan
Haworth 9 tank PNID 05

2.5 Permits and Licenses

The site currently holds an Environmental Permit (reference EPR/BS6025IF/V005) for the following activities granted by the Environment Agency:

- Section 6.4 Part A(1)(c) – Scouring of loose wool with a capacity of 192 tonnes per day.

2.6 Exempt Activities

HSC do not currently undertake any exempt activities.

2.7 Planning

The site operates under full planning permissions from the City of Bradford Metropolitan Council for the permitted activities.

2.8 Aggregation

The aggregation of biowaste recovery activities with other non-hazardous waste recovery treatment have been considered.

All waste streams have been accounted for in the supplied information.

The existing CHP unit has a net rated thermal input of 3.557MWth. The CHP's purpose is to generate electricity, hot water and steam to reduce the import of electricity to power machinery and natural gas to fire the existing boiler. The site also has an existing gas fired boiler with a net rated thermal input of 3.909MWth which is used to generate hot water and steam.

3.0 OPERATIONAL OVERVIEW

3.1 Permitted Activities

With reference to the Environmental Permitting Regulations 2016 Schedule 2 Part 2 Chapter 6 Part A(1)(a), the site currently holds an environmental permit (reference EPR/BS60251F/V005) for the 'pre-treating (by operations such as washing, bleaching or mercerisation) or dyeing fibres of textiles in a plant with a treatment capacity of more than 10 tonnes per day'. This activity is limited to the scouring of loose wool.

The scouring process is described in the following steps:

- Greasy wool containing wool grease (lanolin), dirt and other vegetable material is loaded onto a large conveyor and pre-blended in an accumulator bin.
- Excess dirt and vegetable matter are removed from the wool prior to washing without damage to the fibre.
- The greasy wool is conveyed through a series of temperature-controlled wash bowls containing biodegradable detergent which removes the wool greasy and dirt and debris from the fibres before going through a series of rinse bowls.
- A series of specific temperature-controlled dryers dries the wool, and a moisture management system provides a best fit for specified moisture regain values requested by a customer.
- Wool is press packed in bales of approximately 300-350kg and stored for export to the customer.

The site has an existing Combined Heat and Power (CHP) unit with a net rated thermal input of 3.557MWth. The CHP's purpose is to generate electricity, hot water and steam to reduce the import of electricity to power machinery and natural gas to fire the existing boiler. The CHP is classified as a Medium Combustion Plant in accordance with Schedule 25A of the Environmental Permitting Regulations, and as a Tranche B Specified Generator in accordance with Schedule 25B.

The site also has an existing gas fired boiler with a net rated thermal input of 3.909MWth which is used to generate hot water and steam. The boiler is classified as a Medium Combustion Plant under Schedule 25A of the Environmental Permitting Regulations.

The directly associated activities are as follows:

- Storage and handling of raw materials, finished product and waste
- Generation of heat and steam via gas fired boiler
- Generation of heat and power via CHP
- Treatment of effluent via an anaerobic digestion plant and effluent treatment plant
- Combustion of biogas in a CHP engine
- Collection of uncontaminated surface waters

3.2 Hours of Operation

The site operates 24 hours a day, Monday to Friday, and for 47 weeks of the year. Full opening hours of the facility are stated below:

Monday to Friday:	24 hours
Saturday:	Closed
Sunday:	Closed
Bank Holidays	24 hours

The AD process is continuous within these operating hours.

3.3 Staffing, Roles and Responsibilities

HSC shall ensure that sufficient personnel, who are suitably trained and competent, are present to manage and operate the on-site recycling activities safely and without causing pollution. Personnel will be fully familiar with the requirements of the Permit as is relevant to their specific duties. Personnel shall have clearly defined roles and responsibilities. Any contractors used on site will be provided with necessary information before commencing work. The site will also have a technically competent manager to ensure the plant is operated in compliance with regulations. Operational responsibilities for the site rest with the Site Manager. Staff numbers will be maintained at a level sufficient to operate and supervise the site effectively and throughout periods of employee sickness and holidays.

The site's Engineering and Effluent managers are responsible for:

- Undertaking regular inspections on the equipment to ensure the equipment is in good working order and safe to use;
- Reporting any machinery defects and faults to senior staff;
- Reporting any incidents, dangerous occurrences and near misses to senior staff; and;
- Carrying out the scheduled maintenance on all equipment.

Training shall be reviewed no less than annually by the Site Manager or sooner should a training need become apparent.

3.4 Site Security

All visitors are required to sign in on the visitor's book and sit an induction before entering onto site. CCTV is present across the site.

3.5 Site Identification Board

In conformance with permitting regulations, HSC shall display a clear, all-weather, easily readable Site Notice at or near the entrance to the site. The Site Sign/Notice shall contain the following information:

- Company Name
- The Permit Number
- Emergency Contact Name
- Permit Holder's Telephone Number
- Statement that the site is permitted by the Environment Agency (EA)
- EA National Telephone Numbers

The Identification Board shall be inspected at least once per week. In the event of damage or defect, the board shall be repaired or replaced within three working days.

3.6 Maintenance of Financial Provision

HSC will make financial provision to meet the obligations of the Permit.

3.7 Relevant Convictions

There are no existing convictions in place.

3.8 Reporting to the Environment Agency

All reporting required by the following shall be carried out in accordance with Section 4.4 below. This shall include but is not limited to:

- Relevant convictions
- Change of operator's or holder's details
- Site performance and waste return information
- Occurrence of an environmental incident

4.0 OPERATIONAL PROCEDURES

Site operations are carried out as per Section 4.0. The operational procedures are deemed appropriate for the site processes.

4.1 Anaerobic Digestion Process

The effluent from the raw wool scouring process at HSC is characterised by extremely high Chemical Oxygen Demand (COD) and high solids content. These parameters not only impact upon the environment when discharged to public sewer but are also used to determine the cost of discharge. Lowering these parameters before discharge therefore not only benefits the environment but also reduces operational costs. HSC has implemented efficient wool grease capture from effluent and a physio-chemical effluent treatment plant to reduce COD and solids by around 90% but to the Anaerobic Digestion (AD) process reduces these further. The digestion of effluent produces biogas which is combusted in a CHP engine to produce electricity and heat which is used on site.

The effluent from the scouring process is transferred into the pre-digestion effluent tank via sealed pipework. Process parameters are carefully monitored at all times through the SCADA system.

The plant operates a one-stage digestion process. Six tanks, each with a theoretical capacity of 135m³ each, and working volumes of 123m³ are split into two parallel treatment lines, with each set of three tanks operating in series to one another. The actual fill level of the seventh digester shall vary to meet demand from HSC's decanter.

The delivery of feedstock to the digesters is carefully controlled using the SCADA system, determining the waste input rate to comply with the fermenter 'recipe'. This controls the C/N ratio and the input rate of feedstock to manage biogas yield. The amount of feed from each feedstock source is determined in line with the loading rate calculations to maintain optimal conditions within the digester.

Substrate is mixed in the digesters by circulation pumps to ensure the best distribution of feedstock within the digester, with gas bubble generation also providing a mixing effect. This prevents the formation of localised volatile fatty acids (VFA) which can cause bubbling and make conditions unstable.

Biological desulphurisation (the removal of sulphur from biogas through microbial fixation) occurs within the primary and secondary digesters, and digestate storage tanks. A small amount of pure oxygen is fed into the digesters to facilitate microbiological oxidation.

Achieving an optimal reduction in the concentrations of hydrogen sulphide (H₂S) in the biogas is of particular importance to avoid damage to boilers. The digester tanks are stirred and heated for three days. The temperature of the digesters is maintained between 36°C and 46°C, and the tanks are fully sealed. This allows the AD of the feedstock to take place, releasing a methane-rich gas (biogas) and producing digestate.

Biogas is collected within a gas holder and distributed to the onsite CHP engine that is located at the AD site via collection pipework. The collected biogas will be comprised principally of Methane (CH₄) and Carbon Dioxide (CO₂) (typically 55% methane and 45% carbon dioxide) with trace amounts of other gases, including Hydrogen Sulphide (H₂S) and Nitrogen (N₂). The biogas is collected until the substrate has reached a residence time of no less than three days. The biogas produced will be collected via pipework attached to each digester tank. The collected biogas will undergo "scrubbing"; to remove contaminants using a carbon filter on the CHP's gas intake line. The gas is subsequently dried and cooled before being combusted in the CHP engine to produce electricity from renewable sources to displace the electricity and gas currently used to power the site. The heat generated will provide hot water for the wool washing process. The flare shall only be used in emergencies to flare off any excess biogas. The entire digestion process is enclosed, with no release point to the atmosphere, meaning no emissions should be released during this process.

Following completion of the digestion process, the treated effluent is transferred to the existing effluent treatment plant for final treatment prior to discharge to site. This involves the dewatering of the effluent to produce a solid sludge/digestate which is stored in a roll-on roll-off skip which is removed from site daily. The residual water from the process will be discharged to the mains sewers under a permitted discharge consent.

4.2 Document Control

All documents which form the management system for the permit shall be retained electronically with physical copies retained on site for reference. Access to the documents shall be controlled by the Site Manager and distributed in PDF format as required, following their authorisation. Each document shall contain the relevant issue number and date on the front cover, quality control page and within page headers.

In line with Section 3.8, all documents shall be reviewed annually unless the criteria stipulated in Section 3.8 are met. If, at review, an amendment is required, the issue number, date and the description of change box on the quality control page shall be updated. If, at review, no amendment is required, the date is to be updated but the issue number is to stay the same and the description of change box is to be updated with 'reviewed, no change'.

All documents which form the management system are as stipulated within Table 1.

Table 1 - Document Control Table

Document Reference	Document Title	Issue Number	Issue/Reviewed Date
EPR-B01	Environmental Management System Manual	01	TBC
EPR-C01	Odour Management Plan	01	TBC
EPR-C02	Leak Detection and Repair Plan	01	TBC

4.3 Operational Monitoring Procedure

HSC shall undertake the monitoring as specified within Section 5.0 below.

4.4 Environmental Reporting Procedure

All Environment Agency reporting requirements are included within this reporting procedure and any new reporting requirements shall be added by the Site Manager once received. This will ensure all reporting requirements are submitted within the timeframe specified by the Environment Agency.

4.4.1 Reporting Requirements

In accordance with the Permit, HSC shall report the requirements listed in the Permit on an ongoing basis.

Except where otherwise specified all submissions to the Agency shall be in writing. These correspondences shall include the reference number and the name of the Permit holder.

4.4.2 Ad-Hoc Reporting Requirements

Except where otherwise specified all submissions to the Agency shall be in writing. These correspondences shall include the reference number and the name of the Permit holder. HSC will make the Environment Agency aware of the following:

Relevant Convictions

In the unlikely event of the Permit holder or a relevant person being convicted of any relevant offence, the full details will be provided to the Environment Agency within 14 days of the conviction, as will details of any appeals.

Change of Operator's or Holders Details

The following information shall be notified in writing within 5 working days to the Agency:

- Any change to the Permit holder's trading name;
- Any steps taken with a view to the Permit holder going into administration; and,
- Any change in the operator's trading name, registered address name or registered office address.

Notification of monitoring and/or Spot Sampling

Should the Environment Agency request in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, HSCL shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. This information shall be provided to the Environment Agency at least 14 days before the date the monitoring is due to take place.

Situations where reporting is to be "without delay"

Site personnel will notify the Environment Agency "without delay" following the detection of:

- Any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing, or may cause, significant pollution.
- The breach of a limit specified in the Permit.
- Any significant adverse environmental and health effects.

Site personnel will notify the Environment Agency within 24 hours:

- Of actual or potential incidents and breaches of emissions limits.

During normal working hours' site personnel will contact the Site Officer or the local Environment Agency Office by telephone. The Environment Agency National Incident Hotline number is: 0800 807 060.

4.4.3 Roles and Responsibilities

The roles and responsibilities for upholding this reporting procedure are as follows:

The Site Manager shall:

- Retain responsibility for ensuring all the reporting requirements specified in the site's Environmental Permit are upheld;
- Provide sufficient resource to ensure that this procedure is upheld and maintained;
- Retain responsibility for ensuring all relevant correspondence with the Environment Agency is undertaken in a timely manner as specified within the relevant sections of the Environmental Permit;
- Be the direct point of contact with the Environment Agency;
- Maintain records of report submissions and correspondence with the Environment Agency where appropriate; and,
- Inform the Environment Agency of any changes to the site which could affect the operation of the site in a timely manner.

4.5 Complaints

HSC shall decide and implement any necessary action in response to any complaints or concerns expressed by interested parties, including operatives, customers, clients, members of the public and regulatory authorities. All complaints shall be investigated and documented within the HSC Complaints Register. The following shall be documented:

- Name and contact details of the person who expressed concern or made a complaint;
- Specific subject(s) of the concern or complaint;
- The source / location of where the complaint comes from;
- Date and time communicated to the producer and name of the person to whom it was communicated;
- Nature and date(s) of any actions and checks and who carried them out;
- Nature and date of any response to the person who expressed a concern or made the complaint; and;
- Name of the person who communicated the response.

4.6 Contingency

All of the systems have an automatic control system (ACS). In the event of a fault or out of range values being reported, the ACS will report a fault and if critical an item of plant will be shut down. The ACS will be monitored using a SCADA system and will automatically notify HSC of any faults. Service and maintenance contracts will be taken out with equipment manufacturers with agreed response times in event of plant failure.

4.7 Compliance Audit

HSC shall ensure all documents which form part of the management system for the Permit are reviewed at least annually as part of a yearly compliance audit, or sooner should an environmental pollution event occur.

4.8 Internal Audit and Management Review

HSC shall ensure that all documents which form part of the management system for the operations conducted at site are reviewed at least annually as part of a yearly internal audit, or sooner should one of the following situations arise:

- A complaint is received at site owing to composting operations; or,
- An element of the composting operations changes.

HSC shall ensure, following the internal audit, a management review of the results of the audit are discussed by company directors on an annual basis. The management review should cover all aspects of the audit results, such as any complaints received at site, and put in place a management plan to prevent such situations from reoccurring. Records of the management review will be recorded and maintained.

5.0 POLLUTION CONTROL

5.1 Infrastructure and Plant Maintenance

The site operates a strict maintenance regime and equipment used is of sufficient capacity to allow downtime for routine maintenance and servicing as recommended by the manufacturer.

No plant may be operated unless full instructions and training have been given by a person competent to do so. Operators must also read and understand the manufacturer's operating manual before using machinery.

No plant or equipment may be worked on for maintenance purposes unless it has been removed from the working area of site and has been isolated to prevent an accidental start, only in exceptional circumstances which prevent its removal, shall work be undertaken on any item of plant within the working area of site.

Any newly arrived or hired in equipment is subject to particular scrutiny to ensure it meets the standards required by both the company and current legislation.

All breakdowns or incidents involving plant or equipment are entered in the site diary. Routine maintenance is recorded and daily pre use checks will be completed during the working day to assess any damage or general wear of the machine. The Site Manager shall update the record after any maintenance, servicing or calibration activity has been completed, detailing the actions taken and date of next scheduled service or calibration where appropriate. All formal records of servicing, testing, maintenance, and calibration shall be retained by the site manager.

All Pressure Release Valves are subject to regular inspection and energy generation from the CHP Engines is monitored on a continuous basis via the SCADA system, as a proxy for biogas generation. Digestors and associated assets are continuously monitored via the SADA system. Electricity metering is completed daily. Checks are completed 6 monthly on digestors and associated assets via an external contractor, who will provide a report with recommendations for the plant.

5.1.1 Weekly Site Inspection Checks

1. A competent person (maintenance staff) will undertake a weekly inspection of the site. The inspection will be undertaken and documented using the Site Checklist Template.

2. The Site Manager will ensure that all documented site inspections are retained in accordance with the Environmental Permit.
3. The site drainage system will be visually inspected for condition and performance monthly.
4. Any minor issues identified by the site inspection shall be resolved and overseen by the Site Manager. The Site Manager may delegate actions to site operatives where required.
5. Any significant issues identified such as permit condition breaches or compliance obligation breaches will be recorded in the Site Diary. In such instances, the Directors shall also be consulted where required to ensure the issue is resolved. The Site Manager shall retain responsibility for overseeing the implementation of any necessary corrective actions.

5.2 Meteorological Monitoring

HSC undertake meteorological monitoring using an online live meteorological data platform which records wind direction and speed, amongst other variables. Data is recorded onto a spreadsheet on site at regular intervals. The purpose of monitoring the meteorological conditions is to provide weather data which could be of immediate use for managing the day-to-day operational activities. The rainfall data is of value in predicting the impact on the drainage system.

5.3 Dust, Mud and Debris

Liquid effluent is conferred to the AD plant via sealed pipework and is stored in sealed tanks and as such, dust is not considered an issue on site. The solid sludge/digestate removed from the effluent treatment plant is stored within covered roll-on roll-off skips..

5.4 Pests

The site implements and maintains a series of measures to control and monitor the presence of pests. Risk of vermin activity on site is controlled by:

- The maintenance of sealed tanks and associated pipework, and
- Pest control to control rodents every month by vermin control contractor.

On detection or notification of pest infestations, or evidence of such, immediate action shall be taken to secure the attendance of a professional pest control contractor, to eliminate the

pest infestation. The incident and the remedial action shall be recorded in the pest control record which will be kept in the Site Office.

5.5 Spillages

All spillages will be dealt with immediately. All vehicles, plant and equipment used on site will be operated and maintained in line with Section 5.1, with the objective of preventing environmentally harmful leaks and spills.

The tanks and associated pipework related to the AD system are sealed, banded and are situated on an impermeable surface to ensure that if a spill occurs, it can be contained.

5.6 Odour

Please refer to the site's Odour Management Plan (OMP) for details of how odour is managed at site. The site undertakes a number of practical measures to help minimise odour:

- All process materials are conveyed through a sealed system;
- Minimise waste storage time by maintaining volumes at a manageable level; and,
- Regular cleaning of operational areas to prevent accumulation of potentially odorous material.

5.7 Noise and Vibration

Measures to minimise noise and vibration from AD operations are detailed in the Noise Impact Assessment. To limit the incidence of noise and vibration potentially affecting nearby sensitive receptors, all vehicles and plant will be switched off when not in use.

All vehicles, plant and machinery operated at the site will be maintained in accordance with the manufacturer's specification and site's maintenance schedule and are fitted with effective silencers where possible.

5.8 Emissions to Atmosphere

Emissions monitoring is required from the boiler and two CHP engines every 3 years. The following emission limit values are in place:

Table 2 - Emissions Monitoring Requirements

Emission Point Reference	Source	Parameter	Emission Limit Value	Monitoring Frequency	Monitoring Standard or Method
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A1	Boiler Stack	Oxides of Nitrogen (expressed as NO ₂)	250 mg/m ³	Every 3 years	BS EN 14792
		Carbon Monoxide	N/A	Every 3 years	BS EN 15058
A10	CHP1 Stack	Oxides of Nitrogen (expressed as NO ₂)	95 mg/m ³	Every 3 years	BS EN 14792
		Carbon Monoxide	N/A	Every 3 years	BS EN 15058
A11	CHP2 Stack	Oxides of Nitrogen (expressed as NO ₂)	190 mg/m ³	Every 3 years	BS EN 14792
		Carbon Monoxide	N/A	Every 3 years	BS EN 15058
		Sulphur Dioxide	40 mg/m ³	Every 3 years	BS EN 14791

The flare stack shall only require monitoring from should it run for more than 10% of the year.

6.0 RECORDS

6.1 Monitoring

HSC shall undertake any emissions monitoring in line with Section 5.0 above.

6.2 Plant Maintenance Logbook

A Plant Maintenance Logbook shall be maintained and retained in the Site Office. It shall record visitors, non-routine activities, and other incidents. The logbook should be checked periodically by the Permit Holder to ensure its correct use. The logbook shall be readily available for inspection. Examples of activities recorded in the logbook include:

- Names of operators and times of attendance on site.
- Names and times of technically competent managers on site.
- Names of visitors on site.
- Any accidents resulting in injury.
- Any incident of fire.
- Any incident of spillage.
- Any incidents causing pollution to the environment, harm to human health or detriment to the amenities of the locality.
- Any machinery breakdown.
- Condition of site infrastructure and engineering.
- Incidence of litter, dust, pest, odour and noise problems.
- Environment Agency licence inspection reports.

6.3 Training Records

The Site Manager is responsible for reviewing and identifying training needs in relation to the organisations policies, objectives, and operational procedures. The Site Manager will update the senior managers of any necessary alterations to existing training materials. The Site Manager shall maintain a record of all training undertaken by employees of the organisation. Any new staff joining the organisation will be required to undertake the training as part of their induction.

6.4 Complaints

Records should be maintained such that all complaints are traceable. The HSC complaints form shall be retained securely for a minimum of three years.

6.5 Site Operations

Records should be maintained such that all details are traceable. The following records shall be kept as and when required:

- Plant and equipment maintenance record.