

PESTS MANAGEMENT PLAN

Moss Road, Lyon Road Industrial Estate, Kearsley, Bolton, Lancashire BL4 8NB

Circle Recycling Limited

Version:	1.1	Date:	18 April 2023		
Doc. Ref:	LRIE-2948-J	Author(s):	CP	Checked:	CRL
Client No:	2948	Job No:	001		



Oaktree Environmental Ltd
Waste, Planning & Environmental Consultants



Oaktree Environmental Ltd, Unit 5, Oasis Park, 19 Road One, Winsford, Cheshire, CW7 3RY

Tel: 01606 558833 | Fax: 01606 861183 | E-Mail: sales@oaktree-environmental.co.uk | Web: www.oaktree-environmental.co.uk

REGISTERED IN THE UK | COMPANY NO. 4850754

Document History:

Version	Issue date	Author	Checked	Description
1.0	12/10/2021	CP	-	Application copy
1.1	18/04/2023	CP	CRL	Operator name change

CONTENTS

DOCUMENT HISTORY:	I
CONTENTS	II
LIST OF TABLES:	III
LIST OF APPENDICES:	IV
1 INTRODUCTION	5
1.1 GENERAL	5
1.2 SITE LOCATION	5
1.3 WASTE FACILITY OVERVIEW.....	6
1.4 SITE MANAGEMENT.....	6
1.5 TYPES OF PESTS	7
2 RISK ASSESSMENT	9
2.1 METHODOLOGY	9
2.2 RECEPTOR SENSITIVITY	9
2.3 SENSITIVE RECEPTOR LOCATIONS	9
3 POTENTIAL SOURCES OF ON-SITE PEST GENERATION	10
3.1 WASTE STORAGE AREAS	10
3.2 FOUL SURFACE WATER	10
3.3 BACKGROUND SOURCES OF PEST GENERATION	10
4 PEST CONTROL	11
4.1 SITE OPERATIONS.....	11
4.2 RECEIVING WASTES	11
4.3 STORAGE OF WASTES.....	12
4.4 STOCK ROTATION.....	13
4.5 LOADING AND TRANSPORT OF GENERAL WASTES	14
4.6 HOUSEKEEPING	14
4.7 LIAISON WITH NEIGHBOURS	14
4.8 TRAINING.....	15
5 MONITORING	17
5.1 MONITORING PESTS	17
5.2 MONITORING – PEST/VERMIN.....	17
5.3 MONITORING – FLIES	17
5.4 PRELIMINARY PROCEDURES.....	18
5.5 CONTROL MEASURES - GENERAL.....	18
5.6 CONTROL MEASURES - FLIES	19
5.7 CONTROL MEASURES (VERMIN)	20
5.8 PREVENTION MEASURES (SCAVENGING BIRDS)	21
5.9 POTENTIAL REACTIVE MEASURES (SCAVENGING BIRDS)	21
5.10 COMPLAINTS MONITORING	21
5.11 SITE DIARY.....	22
6 CONTINGENCY PLANS	23
6.1 CONTINGENCIES AND EMERGENCY PLANS.....	23
6.2 OPERATIONAL FAILURE.....	24
6.3 SEASONAL FLUCTUATIONS / ALTERNATIVE OUTLETS.....	24

6.4 PMP MANAGEMENT 25

List of Tables

Table 1.1 - Staffing Levels7
Table 2.1 - Receptor Sensitivity Criteria for pests9
Table 2.2 - Potential Sensitive Receptors within 1000m of the site9

List of Appendices:

Appendix I - Drawings

Appendix II - Record Keeping Forms (to be used if presented with pest problems)

Complaints Report Form

Example pest control monitoring form

Near-Miss / Non-Conformance Sheet

1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd has been instructed by Circle Recycling Limited to prepare a Pest Management Plan (“PMP”) for their waste transfer and treatment facility at Moss Road, Lyon Road Industrial Estate, Kearsley, Bolton, Lancashire BL4 8NB.

1.1.2 The registered address and contact details for Circle Recycling Limited (i.e. the ‘site operator’) is:

Circle Recycling Limited	Contact:	Robert Bint / Matthew Cook
Seddon Building	Position:	Directors
Plodder Lane, Edge Fold	Tel:	01204 570615
Farnworth		
Bolton BL4 0NN		

1.1.3 This PMP will allow Circle Recycling Limited to implement an action plan should the site operatives detect the presence of pests, receive complaints from local business or residents or if the Environment Agency (EA), as the regulator, receives third-party complaints or suspects the presence of pests during a site inspection.

1.1.4 The site is operated in accordance with an Environmental Management System (EMS) along with other documents targeted to specific environmental considerations including this PMP.

1.2 Site location

1.2.1 The site is located at Moss Road, Lyon Road Industrial Estate, Kearsley, Bolton, Lancashire BL4 8NB. The national grid reference for the site is SD 74429 44360.

1.2.2 The site is predominantly located in an industrial area bordering the M61 motorway which is located to the south-west. Surrounding properties comprise industrial and commercial premises and the nearest residential properties lie approximately 250m to the east of the site.

1.3 Waste facility overview

1.3.1 The site is currently operating as a household, commercial and industrial (HCI) waste transfer station. A recent permit variation has been submitted to the EA to enable the storage and treatment of such wastes externally. It must be noted the treatment of mixed HCI wastes will take place internally.

1.3.2 The current building will be used for the tipping, storage and treatment of all incoming waste material and the external yard area will be used for storage of separated recyclable materials and minor crushing activities. The location of the operational areas and storage areas are shown on Drawing No. LRIE/2948/03 which is presented in Appendix I.

1.4 Site management

1.4.1 The Technically Competent Manager (TCM) and site managers at the site are responsible for the general management of the site including the acceptance and handling of any wastes which could give rise to the presence of pests or vermin.

1.4.2 The company, through the TCM, will ensure that any nominated deputy staff are sufficiently trained and familiar with all site management documentation (which includes this PMP) in addition to all relevant company procedures who, in the absence of the TCM, will carry out their duties.







1.4.3 The table overleaf details the staff structure of the site when operating at full capacity. Positions in bold italic print below are the minimum staff requirements when the site is open for the reception of waste:

Table 1.1 - Staffing Levels

Position	Employees	Responsibilities
Site manager/s	3 (1)	Overseeing and co-ordinating all activities which take place at the site
TCM (weekly)	1 (1)	Ensuring that the site is being operated in accordance with Health & Safety Legislation
<i>The above comprise site management who operatives will report to</i>		
Machine / Plant Operator's /	2 (1)	Waste handling/processing, reception and plant operation
General operatives	2 (1)	To conduct site patrols when the site is not manned / operational
Administration staff	1 (1)	Office/administrative duties

1.5 Types of pests

1.5.1 **Flies** - The table below illustrates the species of fly which can sometimes be associated with waste sites of this type and potentially become a nuisance:

	Common housefly <i>Musca domestica</i> Medium		Lesser housefly <i>Fannia</i> <i>sp.</i> Medium
	Scuttle fly <i>Phoridae</i> 'Black-eyed'		Scuttle fly <i>Phoridae</i> 'Black-bodied'
	Drain fly <i>Psychodidae</i> small		Fruit fly <i>Drosophilidae</i> small

1.5.2 Common house flies are readily distinguished from the other smaller fly species that are likely to be captured on traps at Circle Recycling Limited. Larger flying insects such as blue bottles, green bottles, wasps and bees are unlikely to be present in significant numbers since they are not attracted to materials on site.

1.5.3 The life cycle of the common house fly is summarised below to give an approximate indication of the timescales involved from egg laying to growth into mature flies that can reproduce. Timescales vary according to temperature etc. for example:

- a) Egg: A female common house fly can lay up to 150 eggs per batch and can produce up to 6 batches of eggs, which typically hatch within a day or so of being laid.
- b) Larva: Also known as maggots. They are legless and white in appearance. They pass through three instars and can complete their development in as little as 3 days at optimum temperatures (30 - 35°C), after which they pupate.
- c) Pupae: The pupa is contained within the last larval skin, which tans and hardens. The adult emerges after a minimum of 3 days depending on temperature.
- d) Adult: Female common house flies are able to reproduce within two or three days of hatching. In captivity they can live for up to a month but a more typical lifespan for an adult in the wild is approximately a week. The life cycle of a housefly takes a minimum of 10 days at optimum temperature (35°C), but this can extend to several weeks or even months in cold conditions. The short life cycle that is typical of the summer months is the reason why this species is mainly a problem at that time of year. Control measures may be necessary to disrupt the lifecycle and reduce fly populations to ensure that receptors on site and those near the site are not adversely impacted.

1.5.4 **Vermin** – The other type of pests that can sometimes be associated with waste sites of this type is vermin i.e. rodents, rats and other insects.

1.5.5 **Scavenging Birds** – Given the possibility of small amounts of potentially putrescible wastes at the site, scavenging birds i.e. gulls are also considered to be a risk.

2 Risk assessment

2.1 Methodology

2.1.1 This PMP has been completed to identify where the likely risks are in relation to surrounding land uses. This assessment has been used to inform Section 5.0 of this PMP with regard to specific monitoring procedures.

2.2 Receptor sensitivity

2.2.1 Table 2.1 below outlines the receptor sensitivity to pests which will be used when determining nearby sensitive receptors:

Table 2.1 - Receptor Sensitivity Criteria for pests

Sensitivity of Receptor	Criteria
Low	Industrial workplaces
Medium	Industrial workplaces / Residential >250 m
High	Residential areas <200m

2.3 Sensitive receptor locations

2.3.1 The main potential sensitive receptors are listed in Table 2.2 below:

Table 2.2 - Potential Sensitive Receptors within 1000m of the site

Boundary	Receptor	Approximate distance from centre of site (m)
North-east	Residential Properties within 500m of the site	250 - 300
North, east & south	Surrounding users of the industrial estate	0 - 500
North-east, north-west and south-west	Schools/academy's	320 - 800

2.3.2 Total distances are from the boundary of the waste facility closest to the nearest receptor point. In reality distances to the waste storage/treatment areas may be greater.

3 Potential sources of on-site pest generation

3.1 Waste storage areas

3.1.1 Whilst the wastes stored and accepted on site are not commonly associated with pest generation, they could contain some materials (particularly traces of foods from food cartons/packaging and residual wastes) which have the potential to give rise to pests. This can be exacerbated following the ingress of rainwater which occurs predominantly whilst the wastes are resident in skips/containers at the sites of production and prior to receipt at the site.

3.1.2 Whilst not common, these wastes have the potential to contain materials of a putrescible nature which are not identifiable until the load has been tipped at the site.

3.2 Foul surface water

3.2.1 The drainage system shown on LRIE/2948/03 will be monitored regularly to ensure it is functioning correctly. However, periodically skips which have stood on producers' site for a long time often contain foul smelling waste which can cause problems when tipped as the smell can attract pests i.e. scavengers, flies etc.

3.3 Background sources of pest generation

3.3.1 Potential local off-site sources of pests would be associated with the surrounding commercial/industrial activities and residential areas which are prevalent in the immediate area and the wider areas surrounding the site.

3.3.2 In order to determine whether complaints are the result of activities from the site or from other nearby sites a complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

4 Pest control

4.1 Site operations

4.1.1 Limiting the generation of pests from the waste recycling facility can best be achieved through employing effective site management and good general practice. It is much easier to minimise the risk of pests in the first instance and have mitigated measures in place rather than dealing with problems when they occur. It must be noted that the site has no historic issues of pests.

4.2 Receiving wastes

4.2.1 Rigorous control of wastes delivered to the site is required, with contaminated or odorous wastes (stored too long) rejected in line with the procedures in the EMS and EP. Trained competent staff are in place to recognize materials which may result in pests and to inspect incoming wastes as they are deposited at the site. Waste which may increase the risk of pests will either be sorted immediately, returned to the producer or sent to another authorised facility for treatment.

4.2.2 If the site reaches capacity and/or operational difficulties occur, incoming wastes will be diverted to another authorised treatment facility.

4.2.3 Incoming waste will be processed as soon as practicably possible to ensure that any food related or odorous wastes contained within the incoming mixed waste (which were not identified during deposit) can be identified, isolated and rejected without delay.

4.2.4 Wastes are accepted from other waste sites and from municipal sources. Waste acceptance procedures outlined in the operator's EMS will ensure that there is no deposit of any unacceptable wastes at the site. In the unlikely event that there are unacceptable wastes found within an incoming load; these wastes will be immediately moved to the quarantine area and dealt with in accordance with the rejected waste procedure outlined in the EMS.

4.2.5 **Age of wastes** - It is difficult to determine how long waste has been stored by customers prior to receipt on site so the company has taken to engaging customers in quality control issues prior to signing agreements and also carry out duty of care audits.

4.2.6 **Rejection procedure** – The following procedures apply for the rejection of waste which may pose a risk of, or already be subject to, the presence of a significant infestation:

- a) Where the company is in control of a consignment of waste, the drivers are trained to identify the potential for the threat of, or a present infestation by pests/vermin. Where this is identified at the waste producer's premises, the driver will advise the client/customer that the waste cannot be accepted.
- b) Upon delivery to the site, all loads will be visually inspected for the presence of pests/vermin. Should there be evidence of such, this will be recorded as a 'Near-Miss' and be subject to the Non-Conformance Procedure (see Appendix II for recording these incidents).
- c) The site manager will be contacted and photographs of the load will be taken and emailed to the waste producer/customer to advise of the situation to prevent future occurrences.
- d) If the same waste producer/customer was the subject of a second discovery of a similar nature (i.e. a further infestation), the accounts manager would be required to discuss what improvements they could make to their own waste storage procedures as the problem is clearly not resolved.
- e) A third occurrence would require director-level intervention to discuss termination of the contract due to non-conformances.

4.3 Storage of wastes

4.3.1 Low storage times and strict turnaround of biodegradable wastes on site in accordance with Table 4.1 below will be observed. Stock rotation procedures as detailed in the site's FPP will be observed to ensure the maximum duration of storage times are not exceeded.

4.3.2 All waste storage areas with the potential to give rise to the risk of pests are stored internally or within bays as shown on Drawing No. LRIE-2948-03.

- 4.3.3 All waste which has undergone waste sorting/separation are stored in dedicated bays with a suitable freeboard to prevent the waste exceeding the height of the bay. As the waste is continually moved and stored throughout the day, the freeboard is likely to be reduced due to the type of material. The freeboard can be monitored, and the concrete walls are easily viewable by staff.
- 4.3.4 it is considered that the main area where pests could be prevalent on site are:
- i) **AREA 1** – comprising the mixed waste reception area
 - ii) **AREA 2** – comprising trommel fines
 - iii) **AREA 3** – comprising the residual (non-recyclable) waste bay
- 4.3.5 All other storage areas on site will recycled materials such as wood, plastics, inerts, soils. It must be noted that no storage of residual waste will be stored outside other than AREA 1 which will act more as the main temporary tipping bay before waste is subject to mechanical treatment. This waste will continue to move throughout the day and only be stored for longer than the working day between Saturday afternoon until Monday morning.
- 4.3.6 Other storage areas not listed above are not considered to contribute to the risk of pest generation due to either the type of material they are, the containment method, or the fact that they have already been sorted and segregated by hand or machine meaning that all materials with the potential to give rise to pests will have already been removed from the waste.
- 4.3.7 The wastes highlighted in red i.e. those considered to result in pests will undergo continuous visual inspections throughout the day. The residence times for wastes is considerably low (i.e. <12 hours) which ensures that the stockpile is constantly being rotated and inspected, thus preventing the opportunity for pests to arise.

4.4 Stock rotation

- 4.4.1 For all wastes, the maximum storage timescales identified on Drawing No. LR/E/2948/03 above will be adhered to at all times.

- 4.4.2 'Dynamic' stockpiles in bays (i.e. stockpiles which are constantly added to – and removed from) will be deep cleaned Every quarter in accordance with the procedures outlined in Section 4.6 below.

4.5 Loading and transport of general wastes

- 4.5.1 All waste vehicles leaving the site containing putrescible and/or other potentially malodorous wastes will be securely sheeted or enclosed at all times.

4.6 Housekeeping

- 4.6.1 All storage areas the potential to give rise to pests/vermin, will be deep-cleaned once per quarter. This will entail a full removal of all wastes and clearing of residual material to ensure there is no build-up of waste material which could give rise to pests/vermin.
- 4.6.2 Daily cleaning of operational areas such as roads, drainage channels and waste storage areas will be carried out to discourage pest generation as a result of old degrading materials.
- 4.6.3 Equipment that has been in contact with putrescible materials likely to give rise to pests would be cleaned weekly or daily during periods of heavy rainfall using a brush and power hose where material could stagnate i.e. in the bottom of storage areas, skips or mobile plant loading parts. The cleaning will be documented and recorded in the site diary.
- 4.6.4 The buildings on site are checked daily for the presence of any damage which may lead to the build-up or accumulation of putrescible or malodorous wastes/water.

4.7 Liaison with neighbours

- 4.7.1 If any complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of the complaint, weather conditions at the time of complaint, investigation details, action taken and a

signature (as a minimum). Complaints will be investigated and responded to within 24 hours and reviewed by the site manager who is ultimately responsible.

- 4.7.2 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are any issues with pests outside of normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

4.8 Training

- 4.8.1 All employees and sub-contractors of Circle Recycling Limited involved with waste materials and their handling will receive training in basic pest control, identification of infestations (or signs of an infestation) and complaint reporting (management and operations staff).
- 4.8.2 Training will be given to all relevant persons to make sure they are competent in completing complaint report forms to ensure sufficient monitoring can be carried out.
- 4.8.3 Specific training in respect of fly control will include the following and will be carried out by internal managers, entomologists and suppliers of the products before staff can use any of the control chemicals:
- a) Identification of fly species and fly biology
 - b) Monitoring techniques
 - c) Identification of problematic loads
 - d) Use of fly baits
 - e) Use/ handling of insecticide Use/ handling of larvicide
 - f) Use of spray & fogging systems
 - g) Personal protective equipment

- 4.8.4 Training for site staff will be conducted using training modules used at induction stage and during the annual re-assessment stage for consolidation. Toolbox talks are also used for specific additional training which may be required as a result of incidents. Subcontractors are trained during their site induction.

5 Monitoring

5.1 Monitoring pests

5.1.1 Circle Recycling Limited will use the following techniques to monitor pests:

- a) Visual Monitoring
- b) Complaints Monitoring
- c) Site Diary

5.2 Monitoring – Pest/Vermin

5.2.1 The presence of pests will be monitored daily by trained personnel, in accordance with the Site Inspection Checklist in Appendix II of the site's EMS.

5.2.2 Circle Recycling Limited will employ a specialist pest control contractor to undertake regular monitoring of traps to quantify the presence of pests/vermin at the site.

5.3 Monitoring – Flies

5.3.1 Fly populations will be visually monitored at the site and if on-site monitoring shows high levels of fly numbers or complaints are received by third parties, the operator will instal fly boards.

5.3.2 Visual monitoring of outdoor wastes will be carried out daily and any wastes which are observed with a fly density of significant numbers will be moved inside the storage warehouse, which is subject to routine treatment. These wastes may also be subject to knapsack spraying.

5.3.3 Larval monitoring will take place on surface wastes and surrounding floor areas during inspection of incoming to ensure that any problem can be identified. It is difficult to target specific waste types as being more problematical as it is more likely that individual suppliers' waste quality will be the root cause of any larval infestation.

5.4 Preliminary procedures

5.4.1 The purpose of monitoring is to ensure that the measures identified below are working. Where monitoring results demonstrate that control measures are not having the desired effect then additional remedial actions will be undertaken as specified in this document and as agreed with the EA. The daily site checks include pest monitoring.

5.4.2 Visual monitoring of all storage and processing areas will be carried out with daily, with special attention being made to those area highlighted in Table 4.1.

5.5 Control measures - General

5.5.1 The site's strict preliminary acceptance procedures will also minimise the risk of receipt of non-conforming wastes. Wastes are visually inspected upon arrival including for the presence of flying insects or larvae/vermin on the face of the wastes. If there is presence of significant infestation the load requires rejection. Once materials are accepted, they are transferred to the designated storage and processing area and care is taken to ensure that cross-contamination does not occur in order to prevent any potentially contaminated waste affecting other stock.

5.5.2 All staff inspecting materials being delivered to site will be informed of the need to notify a senior manager or supervisor of any possible infestations and make a record of their findings.

5.5.3 Any materials rejected under the company's acceptance and rejection policy will be returned to the originating client as a matter of priority. This process may involve holding the waste for up to 24hrs in exceptional circumstances.

5.5.4 The site operator complies with strict environmental controls for the site, including the clearance of litter and debris from site surfaces and around machinery. Adherence to these procedures also reduces the potential for the build-up of organic debris to occur and thereby reduces the potential for fly-breeding within the debris. Site cleaning procedures will be adhered to at all times to maintain site cleanliness and remove debris, thereby

preventing the creation of breeding areas for flies, with corrective action taken as required and logged. These procedures are standard with the potential to increase the frequency following site checks by the site manager or appointed deputy.

5.5.5 Those wastes which could potentially result in pests (See Section 4) will be stored within bays or inside buildings. The stockpiles will be rotated quickly and only have a storage duration of <12 hours to prevent wastes from degrading and attracting pests.

5.5.6 Any issues relating to pests will result in the stockpile being quarantined whilst specialist pest control contractors are brought in to eradicate the problem.

5.5.7 Of deemed necessary, or if advised by the specialist pest control contractor, the following locations will be the main subject of treatment using the methods and pesticides listed below:

- a) Waste reception and storage areas – comprising unprocessed general wastes, out feed piles and recyclables will be sprayed after receipt to the storage area or after it is discharged from the treatment plant.
- b) Remaining Storage and processing areas – Internal and External Baits will be positioned throughout the site to deal with any potential presence of vermin i.e. rodents.

5.6 Control measures - Flies

5.6.1 Flies are managed using various methods, including the use of regulated chemicals to control the various stages of the fly life cycle. The use of all chemicals by staff on site is controlled by the company's health and safety policy. Any fly control products that are used will be used strictly in accordance with the product label.

5.6.2 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. All staff using non-agricultural pesticides on site will be trained and competent as required by the Control of Pesticides Regulations 1986 (a copy of which will be retained in the site office).

5.6.3 The use of pesticides will be kept under review to ensure that all products in use are approved and are rotated to avoid the potential for resistance. The addition of new pesticides and removal of those currently in use will be documented in the site diary and added to this plan on the next review. Pesticides are set out below, for reference.

INSECTICIDE
FICAM
QUICKBAYT
CYPERMAX
AQUAPY
DEADLINE
VULCAN C (contract)

5.7 Control measures (vermin)

5.7.1 In addition to the general acceptance and housekeeping measures, routine monitoring will be undertaken by site management. Should any visual signs of a rodent infestation be encountered (dropping, sightings etc.), these will be recorded on the daily Site Inspection Form and baiting and trapping will be installed via consultation with an external pest control specialist. Bait boxes will be moved around the site as the site develops.

5.7.2 If any activity of ingress by rats is found then bait boxes will be adjusted or increased.

5.7.3 The use of rodenticide will also be considered; however, this is dependent on the nature, location and scale of the infestation and will be decided by site management/consultants at the time.

5.7.4 Pesticides are set out below, for reference.

RATIMOOR BROMODIOLONE
DIFENACOUM - BRIGAND

5.8 Prevention measures (scavenging birds)

- 5.8.1 With regards to scavenging birds (gulls etc.), noise activities and movement of vehicles and plant on site tends to deter the birds from actually entering the site. However, the situation will be monitored by the site manager.
- 5.8.2 Should scavenging birds be identified during site monitoring, management will consider additional potential measures as discussed below.

5.9 Potential reactive measures (scavenging birds)

- 5.9.1 As stated previously, noise activities and movement of vehicles and plant on site tends to deter the birds from actually entering the site. However, the situation will be monitored by the site manager. Should significant levels of scavenging birds be identified during site monitoring, additional proofing buildings may be installed. These may include:
- a) fitting fine mesh grilles to openings.
 - b) fitting bird repellent strips to reduce the availability of perching points for birds.
 - c) the use of netting to prevent birds roosting.
 - d) The use of sonic or ultrasonic bird scaring/repelling devices.

5.10 Complaints monitoring

- 5.10.1 All complaints will be investigated promptly and appropriate remedial action will be taken if the complaint is validated e.g. remove materials off site as soon as reasonably possible. Complaints will be recorded on the form found in Appendix II.
- 5.10.2 Complaints to the Local Authority / EA will also be recorded and taken into account. An assessment will be carried out from where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

5.11 Site diary

- 5.11.1 If members of the local community are frequently reporting issues in the vicinity, then they will be asked (if agreeable) to keep a diary. This will help to build up an account of when the pests occur and their approximate prevalence, their location and the site operations that were being carried out at the time, as well as the duration of the activities taking place. Any obvious problems can then be addressed.

6 Contingency plans

6.1 Contingencies and emergency plans

6.1.1 In accordance with the EA guidance on PMPs contingency plans have been prepared to react to situations 'where monitoring indicates that a potential source of pests is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred'.

6.1.2 If the presence of pests is detected at the site boundary, monitoring points or a complaint is received, the following remedial procedures will be taken and the contingency measures shown in sections 6.3 – 6.7 will be implemented:

- a) Firstly identify the source; is it from:
 - i) Site operations; or,
 - ii) An off-site source

- b) If on site:
 - i) Report incidence to the site manager or technically competent manager;
 - ii) If validated, the TCM will contact the appointed specialist pest control contractor and/or entomologist;
 - iii) Identify the cause of the pests i.e. leakage, waste storage, etc;
 - iv) Identify a solution in consultation with the specialist pest control contractor and/or entomologist;
 - v) Implement a solution, managed by the specialist pest control contractor and/or entomologist;
 - vi) Carry out olfactory tests to check if fix is working;
 - vii) Record actions taken on relevant forms and site diary as required by this plan;
 - viii) Monitoring in conjunction with the specialist pest control contractor and/or entomologist.

6.2 Operational failure

- 6.2.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will, in turn, contact the contract engineer immediately who will assess major breakdown consequences and identify appropriate contingency measures. This may lead to a build-up of waste or result in waste being on site for longer periods of time. In this scenario, the following steps would be taken:
- a) Diversion/removal of wastes to an suitable alternative facilities who will be identified through collaboration with the Recycling Association.
- 6.2.2 Serious operational failures, which result in the closure of the site, will be recorded in the site diary.
- 6.2.3 All repairs to site security will be made within on the discovery of the damage if possible and the site will be made secure until the repair has been carried out.
- 6.2.4 Any major defects found during the daily site inspection which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, EA will be contacted to agree a suitable timescale for repair.
- 6.2.5 All defects and problems likely to give rise to odour will be recorded on the site inspection form or the operator's own recording procedures/documentation with repairs/solutions being carried out immediately; neighbours will be alerted if the problem cannot be rectified immediately and provided a timescale when the problem will cease.

6.3 Seasonal fluctuations / alternative outlets

- 6.3.1 It is considered due to the size of the company that they will not be hampered by seasonal fluctuations. Circle Recycling Limited will be primarily accepting waste from the surrounding area. Under normal operating conditions, there will always be an outlet for the waste

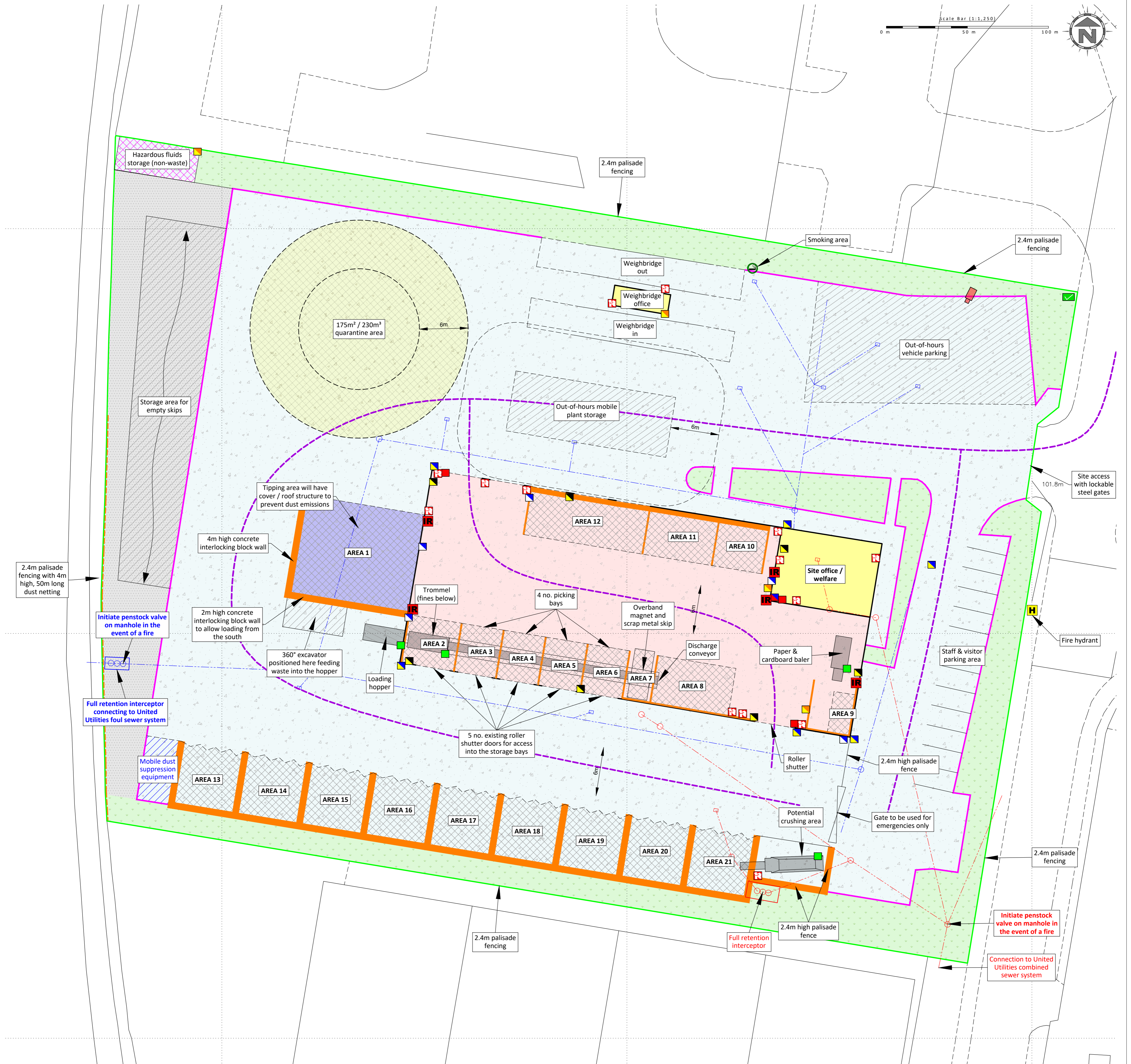
material to ensure it is not stored in a manner to generate odour. However, outlet sites may experience routine or unplanned shutdowns due to maintenance or breakdown which may, in turn, lead to a build-up of wastes at the site. In this case, the company will engage in liaison with the Recycling Association to identify alternative outlets, should this be required. If no alternative outlets can be identified, Circle Recycling Limited will liaise with their clients and customers to enable them to identify alternative sites to accept their wastes until normal operations at the site can resume following the resumption of operations at outlet sites.

6.4 PMP management

- 6.4.1 This PMP will be reviewed at least annually unless it becomes apparent that the activities are giving rise to pollution outside the site, in which case it will be revised within 7 days and a copy forwarded to the EA for approval before implementation.

Appendix I

Drawings



Storage Area Details

Plan Ref	Description	Storage type	Containment / type	Height of firewall (m)	Max width of pile (m)	Max length of pile (m)	Max height of pile (m)	Approx. area (m ²)	Conversion factor used	Approx. volume (m ³)	Average storage time	Max storage time	Comments
AREA 1	Mixed waste reception area (HCI waste)	Unprocessed	Free standing pile / three-sided concrete interlocking block fire wall	4	15	12.5	3	187.5	0.75	422	<2 hours	<48 hours	48 hours is based on Sat - Mon; storage time likely to be less as the pile will continually move throughout the day
AREA 2	Trommel fines	Sorted by trommel screen	Free standing pile / two-sided concrete panel fire wall	3	6.5	6	2	39	0.75	59	<2 hours	<48 hours	As above
AREAS 3 - 6	Hand picked wastes from picking line comprising wood, residual, plastic, paper & cardboard	Processed (by hand)	As above	3	6.5	6	2	39	0.75	59	<2 hours	<48 hours	As above and volume is based on each storage bay. Once bays are full the waste will be transferred to the external overflow bays (AREAS 13 - 19)
AREA 7	Scrap metal	Processed (magnet)	40 cubic yard skip	3	2.5	6.1	2.62	15.25	1	40	<12 hours	1 week	Skip removed when full and replaced with empty skip; timescale dependent on metal content in waste
AREA 8	Hardcore / rubble	Sorted via treatment plant	Free standing pile / two-sided concrete panel fire wall	3	10	6	2	60	0.75	90	<2 hours	<48 hours	See AREA 1 comments
AREA 9	Baled paper & cardboard	Processed, sorted & baled	Bales within three-sided concrete panel fire wall	3	2.5	5	2	12.5	0.75	19	<2 hours	<48 hours	See AREA 3 - 6 comments
AREA 10	Miscellaneous bay i.e. non-conforming waste	Unprocessed (hand sorted)	Free standing pile / three-sided concrete panel & interlocking block fire wall	3	6	6	2	36	0.75	54	<48 hours	<48 hours	See AREA 1 comments
AREA 11	Plasterboard	Unprocessed (hand sorted)	As above	3	6	6	2	36	0.75	54	<2 hours	<48 hours	See AREA 1 comments
AREA 12	Residual waste	Processed, hand sorted by treatment plant	As above	N/A	15	6	2	90	1	180	<48 hours	<48 hours	Acting as overflow bay from AREAS 3 - 6; pile removed sooner if full
AREAS 13 - 18	Overflow storage bays from wastes recycled inside the building	Processed, hand sorted by treatment plant	Free standing pile / three-sided concrete interlocking block fire wall	4	8	8	3	64	0.75	144	<48 hours	<1 week	As above and pile size based on each bay
AREA 19	Soils & stone	As above	As above	4	8	8	3	64	0.75	144	<48 hours	<1 week	As above
AREAS 20 & 21	Hardcore & crushed stone	As above and crushed	As above	4	8	8	3	64	0.75	144	<48 hours	<1 week	As above

CONVERSION FACTORS
 Conversion factors for waste piles are worked out using the following methods set out by The Environment Agency
 The maximum length width pile is based on the largest dimension - the volume of the pile has been calculated using the area x height x relevant conversion factor
 Conversion of 1 for materials stored within containers, area of storage in stackable containers and waste/bale stacks
 Conversion of 0.75 for waste stored within a bay based on volume of pyramid x rectangle x height
 Conversion of 0.333 for waste stored in a free-standing stockpile
 For areas containing skips, conversion is calculated by volume of each skip x number of skips

Oaktree Environmental Ltd
 Waste, Planning and Environmental Consultants

DRAWING TITLE
SITE LAYOUT & FIRE PLAN

CLIENT
Circle Recycling Ltd

PROJECT/SITE
Lyon Road Industrial Estate, Kearsley, Bolton, Lancashire BL4 8NB

SCALE @ A1
1:250

CLIENT NO
2948

JOB NO
001

DRAWING NUMBER
LR/E/2498/03

REV
C

STATUS
Issued

DRAWN BY
CP

CHECKED

DATE
18.04.23

KEY:

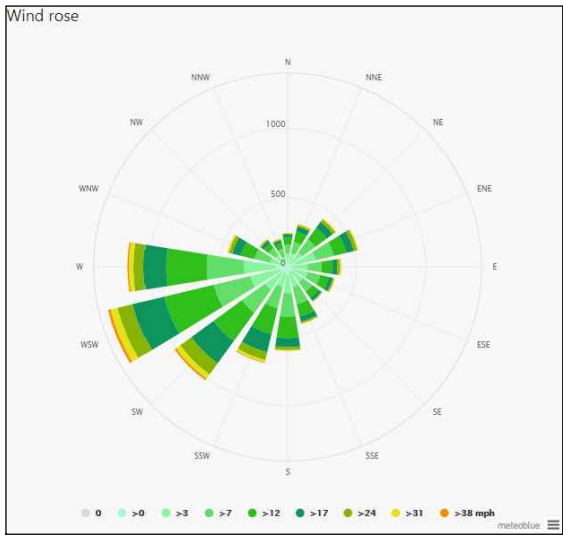
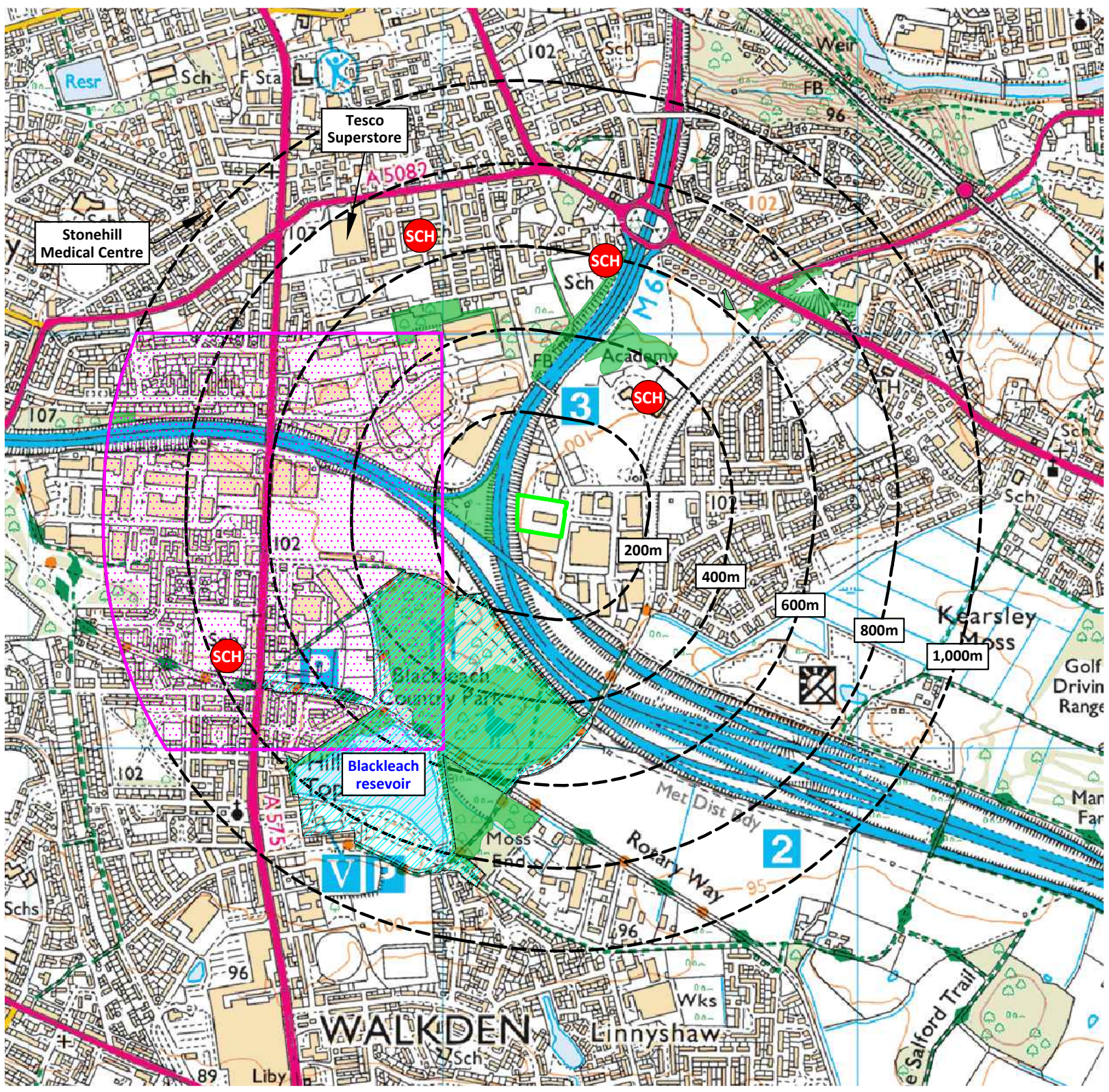
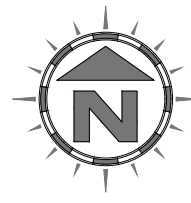
- Permit boundary
- Waste storage areas
- Non-waste hazardous fluid storage (i.e. diesel, AdBlue etc.)
- Waste recycling building (concrete floor with sealed drainage)
- Other buildings i.e. workshops/offices
- Impermeable concrete with sealed drainage
- 0.15m high concrete kerb
- 0.6m - 0.8m thick concrete interlocking block firewall
- 0.15m wide concrete panel firewall
- Surface water gully's & manholes
- Foul water gully's & manholes
- Underground surface water drainage
- Underground foul water drainage
- Quarantine area
- Fire water containment equipment
- Fire extinguisher locations
- Plant shut off points
- Fire alarms
- Spill kits
- Water points
- Access route for emergency services
- Surface water gully's
- Fire hydrant
- Fire assembly point
- Flame/heat detection cameras
- CCTV cameras (internal & external)
- Pan, tilt & zoom camera (50m coverage)

NOTES
 Drawing for indication only. Reproduced with the permission of the controller of H.M.S.O. Crown copyright licence No. 100022432. This drawing is copyright and property of Oaktree Environmental Ltd.

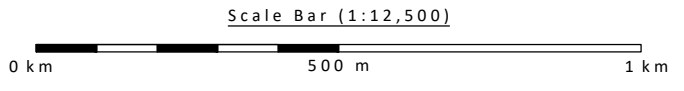
REVISION HISTORY

Rev:	Date:	Init:	Description:
-	06.10.21	CP	Initial drawing
A	07.10.21	CP	Client comments
B	12.10.21	CP	Client comments
C	18.04.23	CP	Operator name change

-  Permit boundary
-  Surface water body (pond / pool / lake)
-  Stream, river, beck
-  Buildings includes Agricultural, industry, commerce and retail - could also include small houses)
-  Residential blocks
-  Class A roads
-  Class B roads
-  Class C roads
-  Local nature reserve / local wildlife site
-  Protected species
-  Priority Habitat - Deciduous Woodland
-  Other woodland areas (non-habitat)
-  Schools including primary, high, colleges and Universities
-  Care homes
-  Places of worship
-  Fire hydrants (indicative)



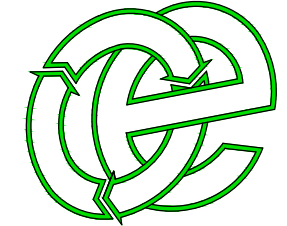
Compass Wind Rose for Bolton sourced on 21/09/2021
- source: Meteoblue



NOTES
Drawing for indication only. Reproduced with the permission of the controller of H.M.S.O. Crown copyright licence No. 100022432. This drawing is copyright and property of Oaktree Environmental Ltd.

REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	07.10.21	CP	Initial drawing
A	18.04.23	CP	Operator name change

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
PERMIT BOUNDARY PLAN

CLIENT
Circle Recycling Ltd

PROJECT/SITE
Lyon Road Industrial Estate, Kearsley, Bolton, Lancashire BL4 8NB

SCALE @ A3 1:12,500	CLIENT NO 2948	JOB NO 001
-------------------------------	--------------------------	----------------------

DRAWING NUMBER LRIE/2948/04	REV A	STATUS Issued
---------------------------------------	-----------------	-------------------------

DRAWN BY CP	CHECKED --	DATE 18.04.23
-----------------------	----------------------	-------------------------

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

Appendix II

Record Forms

**CIRCLE RECYCLING LIMITED
COMPLAINTS REPORT FORM (CNW/RF/7)**

Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form CNW/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

- 1) The name, address and telephone number of the caller will be requested.
- 2) Each complaint will be given a reference number.
- 3) The caller will be asked to give details of:
 - a) the nature of the complaint;
 - b) the time;
 - c) how long it lasted;
 - d) how often it occurs;
 - e) Is this the first time the problem has been noticed; and
 - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:
 - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - b) strength and direction of the wind; and
 - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report.
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the EA and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.