

Silica Developments Limited

**Storage and Transfer Facility for Waste Glass
At**

Gate 4, Shoreham Port, Brighton Terminal, Basin Road South, Shoreham, BN41 1WF

Environmental Management System

Operating Procedures

Reference: EMS-OP-01

October 2024

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1. INTRODUCTION

1.1 Purpose

These procedures form the Environmental Management System for the operations carried out at Dock Gate 4, Shoreham Port, Brighton Terminal, Basin Road South, Shoreham, BN41 1WF.

The operator manages waste glass only. The waste glass will be delivered to the site for bulk storage. The waste glass will then be exported using the port facilities.

1.2 Responsibilities

The Director has the overall responsibility for ensuring that operating procedures are prepared for the operations and are communicated throughout the organisation.

The Director works closely with representatives at Shoreham Port Authority (SPA). SPA will be responsible for loading ships. SPA will provide staff and machinery for loading purposes.

1.3 Scope

The procedures cover the activities carried out at Gate 4, Shoreham Port, Brighton Terminal, Basin Road South, Shoreham, BN41 1WF. The site is centred on NGR TQ 76524 31301.

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2. MANAGEMENT OF OPERATIONS

2.1 Site Layout and Signage

The boundary of the permitted area is shown on Drawing No. SDL-SBS-EP-01. A Site Layout Plan is shown on Drawing No. SDL-SBS-LAY-01.

The bulk storage facility is located within Shoreham Port. A site notice will be displayed at the entrance to the bulk storage facility.

The noticeboard will display the following information:

- Permit holder's and Operator's name.
- An emergency contact name and the Operator's telephone number.
- A statement that the site is permitted by the Environment Agency.
- The permit number.
- Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline)

The sign will be kept in good order to ensure it is legible.

A copy of the Environmental Permit and a copy of this document will be kept in the operator's office, which is located off site. A copy of the permit will also be kept in the Operational Manager's office at Shoreham Port.

2.2 Security

The site is located within the security control of Shoreham Port. There is one road onto the port, which has a gated entrance. The gate is steel palisade and is locked at the end of each working day.

Visitors to the estate must first enter the Shoreham Port offices at Gate 1 and register at the office. This is a photographic ID process confirming the purpose of the visit and car registration details.

CCTV is provided across the port.

Representatives of the operator must sign into the site when visiting.

Security staff patrol the perimeter of the estate out of hours.

2.3 Technical Competence and Training

The overall operations will be overseen by a Technically Competent Manager (TCM). The TCM will be responsible for ensuring the requirements of continued competency is met. A copy of the Certificate will be kept at the operator's office and at Shoreham Port.

In addition to the TCM, there will be a Site Supervisor. The TCM will work with Shoreham Port representatives to ensure that all procedures in the EMS are issued to appropriate staff.

The TCM and Site Supervisor are also responsible for:

- Investigating any incidents or non-conformances or complaints in accordance with the relevant procedures and reporting forms.
- Ensuring that required data is provided to the Environment Agency at the agreed frequency.
- Completing the checks.

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- Ensuring all operational staff have a suitable induction to the site and have had the relevant training for handling the waste glass.
- Maintaining Staff Training Records.
- Ensuring all staff are familiar with safe operation of all necessary aspects of the site, relevant to their specific roles.

Other site personnel will include site operatives. The site operatives include machine drivers responsible for unloading vehicles and loading ships. Site Operatives will also include weighbridge staff.

It is the responsibility of Site Operatives to:

- Act in accordance with the instruction given to them from the TCM and Site Supervisor.
- Follow these operational procedures for all stages of waste handling.
- Report any incidents or non-conformances to the TCM or Site Supervisor.
- Ensure all equipment used on site is checked before use each morning for signs of wear and tear which could compromise health and safety or environmental protection. Any issues with equipment or the condition of the site must be reported to the Port Authority immediately, before the equipment is used. Alternative plant and machinery are available on the port.

There may be occasions when sub-contractors are required to carry out maintenance or other works at the site.

It is the responsibility of all sub-contractors to:

- Report to the Port office before carrying out any duties on site.
- Comply with Site Induction briefing.
- Comply with the site rules:
 - Comply with instructions given by the Port Authority or TCM.
 - To ensure that the correct PPE is worn at all times when not in the vehicle.

All staff will be trained to a standard which enables them to perform their responsibilities. The following Training Matrix will be used to determine training needs.

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Training Needs for Each Role	TCM	Site Supervisor	Plant Operatives	Administration Staff
Induction	X	X	X	X
Accidents and Emergency	X	X	X	X
Fire Prevention	X	X	X	X
Amenity Management	X	X	X	X
Plant Training			X	
Waste handling	x	X	X	
Environmental Permitting	X	X	X	X
Complaints and Incidents	X	X	X	X
Spillage Procedure	X	X	X	

A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed.

2.4 Site Records

A record of the types, quantities and dates of wastes deposited at the site under the Permit will be maintained and provided to the Environment Agency at three-monthly intervals, within one month of the end of each period.

A copy of all records including transfer notes, consignment notes and weighbridge records will be maintained at the head office.

2.5 Site Diary

A site diary will be maintained and updated to include the following:

- Significant events with dates
- Start and finish of site activities
- Plant maintenance and breakdowns
- Emergencies
- Rejected vehicles and details
- Dispatch of records to the Environment Agency
- Weather conditions, including temporary site closure
- Vehicle deliveries
- Any environmental problems and actions taken
- Any complaints
- Records of site monitoring
- Records of waste taken from site, either liquid from the sealed system or waste requiring onward transport for treatment

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The site diary will be kept in the operator's office which is located off site. The Port Authority staff will notify the TCM of any issues which need to be included in the Site Diary, for example, if there are any issues with machinery.

2.6 Inspection and maintenance

The Site Supervisor will be responsible for inspecting the storage areas and preventative maintenance will be undertaken according to the checklist. The Site Inspection Checklist is below.

Site Inspection Checklist

Issue	Frequency	Action
Cleanliness (presence of litter)	Daily	Sweeping of impermeable surfacing if mud/debris present
Inspect drainage system for capacity.	Daily	Arrange for drainage to be emptied if the water level is at 75% full.
Visual inspection of estate fences for damage	Daily	Repair with suitable fencing. Record in diary
Visual monitoring for aerial emissions. Monitor dust at random times throughout the day and during loading / unloading.	Daily	Check site boundaries for visual dust emissions. If leaving the boundary damp down with hoses/bowser or dust canon. Record in diary
Surface dust/debris	Weekly	Sweep yard and hose in dry weather.
Site sign	Daily	Repair/replace if damaged
Pest/birds infestation check	Weekly	Implement pest control contract if presence of pests/birds is noted
Inspect fuel tanks for leaks and damage	Daily	No fuel tanks within permit boundary.
Check condition of impermeable surface in the storage area	Weekly	Effect repairs as necessary
Check waste storage capacity.	Weekly	All waste deliveries are pre-notified allowing the operator to maintain stock control sheets. Ship movements are booked in advance and can carry a known tonnage. This allows accurate management of capacity.

Machinery on site is visually inspected by the operator before it is used. This is covered in training for staff and operatives. In addition, mobile plant checks must be carried before being used. Any defects will be reported to the Port Authority or TCM and recorded in the Site Diary.

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In addition to scheduled preventative maintenance of equipment and machinery, in accordance with legal requirements or manufacturer's recommendations, reactive maintenance will be carried out if needed in accordance with inspection findings.

2.7 Contingency

It is recognised that even with well planned maintenance, contingency plans must be in place in the event of a serious breakdown.

To ensure all permitted waste quantities are adhered to and no amenity issues are caused, the following measures will be implemented:

- Service Plans in place for the site plant. Engineers can be called out to undertake any repairs required.
- Port Authority has alternative machinery available to deploy for use.
- If capacity at the bulk storage area is reached and there is an issue with loading the ship, alternative arrangements will be made to temporarily store the waste at a third party waste site (with an Environmental Permit) whilst repairs/replacement is made.

The Site Supervisor and/or TCM will review the weather forecast at the start of each working week. If there is a Met Office warning for storm conditions, the Site Supervisor will check the drainage and if necessary arrange for the drainage to be emptied. If there are warnings for extreme high temperatures, arrangements will be made to dampen the waste.

2.8 Routine Cleaning

The site is subject to regular cleaning. When a shipment has been loaded, the storage bay will be swept and cleaned prior to new deliveries.

The permit boundary will be checked daily and will be swept accordingly.

2.9 Storage and Drainage

The bulk storage area is surfaced with concrete. This is an established bulk storage facility that has been used for storing and transporting materials and waste.

The bulk storage facility has a 6m high concrete wall around three sides, with sub division block work forming internal bays. There is also a 2.4m high concrete block wall forming the front barrier, with just an entry point for vehicles to unload / load.

Bay 1 will be used for storing MRF Glass. This is coded EWC 191205 Glass or 191212 mixed waste containing glass, depending on the composition.

Bay 2 will be used for storing MRF Glass or other glass.

Both bays will have separate sealed drainage. Any surface water within the storage bay will drain to a pipe that will drain into a sealed channel. The sealed channel will be inspected daily and if the water level is at 75% level, arrangements will be made to empty the system.

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3. WASTE HANDLING PROCEDURES

3.1 Pre-Acceptance Procedures

The site will only handle waste glass. The following codes will be accepted:

150107	Glass packaging
170202	Glass
191205	Glass
191212	Mixed waste containing Glass
200102	Glass

Waste delivered by the operator's own vehicles:

- Source of waste known at time of booking.
- Checks made on acceptability of waste.
- Customer informed of acceptable waste types before booking confirmed.

Waste delivered by third party waste contractors:

- Details of carriers licence checked.

3.2 Site Acceptance Procedures

The company will only accept wastes which are allowed under the permit. The site is a specialist facility and therefore it is unlikely that non permitted wastes will be delivered to the site.

Glass produced at Material Recycling Facilities (MRF)

Before accepting a new contract for the supply of waste glass, a representative of SDL will visit the source site and visually inspect the glass. Samples will be collected for analysis. The mixed glass is typically from large Material Recycling Facilities operated by established, reputable waste management companies (e.g. Biffa, Veolia).

SDL will request the previous 12 months testing data generated at the source site. MRF sites are required to carry out output sampling.

The testing will check the glass by weight. A sample is taken and weighed. It is then hand sorted to remove any incidental material (cardboard, metal, plastic and organic). The separated fractions are all weighed. The average limit for SDL will be 95% glass by weight.

Once these checks have been used to classify the waste and confirm it is permitted, the producer will be registered with SDL for delivering waste glass.

During the first week of deliveries from a new source, each load is visually checked and tested. Thereafter, a sample of glass is taken every 250 tonnes for weight testing.

SDL visually inspect the waste glass stockpile twice per week and maintain a weekly photographic record.

Glass produced at MRFs can be classified as 191205 Glass, or 191212 Waste Glass containing other non-hazardous waste. The producer (MRF operator) will be required to classify the waste glass

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leaving their site.

SDL will carry out compliance checks to confirm the correct code has been used. With reference to the guidance¹, the decision should be made on a case by case basis.

As part of the classification, SDL will confirm if the source site is a Mixed Dry Recyclable Facility (MRF). This will help to confirm that the input material is non-hazardous waste. SDL will review the site's Waste Acceptance Procedures and check their procedures for removing non-compliant waste such as vapes and batteries.

The waste acceptance procedures at the MRF will be important to ensure that any mixed glass containing non-hazardous waste (EWC191212) is non hazardous. The MRF operators also work with Waste Collection Authorities to inform residents and businesses about the materials that can be placed in the collection bin. This will help reinforce the position that batteries and vapes should not be placed in the recycling bin.

With reference to the Environment Agency guidance, when the composition of the waste and its components is widely understood not to include hazardous substances, and visual inspections would easily identify materials likely to be hazardous, then the waste assessment may not need to include sampling and testing.

Prior to removal from the MRF, the waste producer will carry out periodic sampling to confirm the weight of glass, and other components. At this stage, the visual assessment will allow the operator to remove any non-compliant waste such as batteries and vapes.

The glass will typically be from a dry mixed recyclable input which is mixed with paper, plastics, and metal cans only. The input and output waste are consistent and as such no other testing will be required.

As the waste is unloaded at the bulk storage facility, any incidental items of waste (plastic bags, cardboard) will be placed in a general waste bin.

Single source collected glass

Before accepting a new contract for the supply of single source glass, a representative of SDL will visit the source site to visually inspect the glass and check the procedures for generating it. The single source glass is typically from established, reputable waste management companies (e.g. Biffa, Veolia).

If the visual checks confirm single source glass, the producer will be registered with SDL for delivering waste glass.

During the first week of deliveries from a new source, each load is visually checked. A sample of glass is taken every 250 tonnes for weight testing.

SDL visually inspect the waste glass stockpile twice per week and maintain a weekly photographic record.

Glass generated can be classified as 150107 Glass, or 200102 Waste Glass. The producer will be

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Glass from waste treatment facilities, Guidance LIT 72733, published 21 May 2024.

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required to classify the waste glass leaving their site.

SDL will carry out compliance checks to confirm the correct code has been used. With reference to the guidance², the decision should be made on a case by case basis.

SDL will review the site's Waste Acceptance Procedures and check their procedures for removing non-compliant waste such as vapes and batteries. This will help to confirm that the input material is non-hazardous waste.

With reference to the Environment Agency guidance, when the composition of the waste and its components is widely understood not to include hazardous substances, and visual inspections would easily identify materials likely to be hazardous, then the waste assessment may not need to include sampling and testing.

Prior to removal from the supplying site, the waste producer will carry out periodic visual assessments, allowing the operator to remove any non-compliant waste such as batteries and vapes. The input and output waste are consistent and as such no other testing will be required.

For all waste glass streams

All waste delivery vehicle drivers will be given directions to Shoreham Ports weighbridge office before they attend site.

All waste delivery vehicles will use the weighbridge located at Gate 3. The weighbridge operator will provide the haulier the directions to the bulk storage bays. Each storage bay will be clearly signposted. Once unloaded, the driver will leave the site via the weighbridge.

The site supervisor will check the waste, removing any clear and obvious non-compliant waste such as plastic sacks. These will be placed in a quarantine container.

The loading shovel driver will push the waste up in the storage bay, ensuring that all waste remains in the bay and below the 5.5m height marker.

3.3 Non-Permitted Waste

A general waste skip will be used to quarantine any non-permitted waste. The quarantine container is shown on Drawing No. SDL-SBS-LAY-01.

The quarantine containers will be checked daily, and arrangements made to remove the waste as and when required. The quarantine container may be moved around the site.

All staff will receive training to identify non-compliant waste.

3.4 Waste Transfer Note Documentation

The delivery driver will provide a waste transfer note to the weighbridge staff to complete the Duty of Care.

The weighbridge staff will provide the Director all transfer notes to enable the waste returns to be

²

Glass from waste treatment facilities, Guidance LIT 72733, published 21 May 2024.

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completed.

3.5 Waste Storage

3.5.1 Bay 1

Bay 1 will be used for storing MRF Glass. This is coded 191205 Glass, or EWC191212 Mixed Waste containing glass, depending on its composition. This waste has been derived from Material Recycling Facilities (MRF).

Whilst the MRF is used to separate recyclable wastes, the mixed glass can contain a small amount of other materials such as cardboard, plastic and metal. The composition will determine the EWC, and this will be carried out on a case by case basis.

No more than 6,000 tonnes of waste glass will be stored in Bay 1 at any one time.

3.5.2 Bay 2

Bay 1 could be used for storing MRF Glass from a different source. This is coded EWC191212 Mixed Waste containing glass. This waste has been derived from Material Recycling Facilities (MRF), and whilst the MRF is used to separate recyclable wastes, the mixed glass can contain a small amount of other materials such as cardboard, plastic and metal. This bay may also be used for storing other glass 191205, 200102, 150107.

Either Bay 1 or 2 can also be used for storing general glass. However, no mixing of glass will take place as the contents of each bay will be for a specific destination.

No more than 6,000 tonnes of waste glass will be stored in Bay 2 at any one time.

The total amount of glass that could be stored on site at any one time will be 12,000 tonnes.

There may be occasions when different waste glass streams are contracted for export. In such cases, concrete legio blocks will be used to subdivide the bays into small storage areas. The overall storage limit of 12,000 tonnes will apply.

The site will handle up to 100,000 tonnes of waste glass per annum.

3.6 Waste Treatment

No waste treatment will take place. This is a bulk storage facility for transferring waste glass to ships for export.

3.7 Waste Dispatch

All waste exported will be subject to the Transfrontier Shipment Regulations and associated paperwork will be completed prior to accepting waste for storage.

3.8 Planned Preventative Maintenance

The operation will use the following equipment:

- Loading Shovel

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- Crane

A programme of routine planned maintenance will be provided for each item of plant and machinery, to prevent breakdown and faults.

All faults which require corrective action will be reported to the TCM to be implemented.

The plant and equipment will be subject to service agreements with the manufacturer and/or supplier. Where appropriate, these agreements will include a 24 hour call out facility.

Alternative plant and machinery is available on the Port for contingency measures.

3.9 Fuel

No fuel will be stored in the permit boundary. All plant and machine refuelling takes place off site.

3.10 Routine Cleaning

The site will be subject to regular cleaning. However, the bulk storage facility does not have vehicles accessing and traversing the site throughout the day. Vehicles are only present during loading / unloading.

The Port Authority carries out daily checks as part of the on-going maintenance of the port. Any issues will be reported to the Port Authority or the TCM.

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4. EMISSIONS MANAGEMENT AND MONITORING

4.1 Introduction

An Environmental Risk Assessment has been prepared for all operations at the site. These procedures are based on the risks identified in the Risk Assessment, see SDL-SBS-ERA-V1

4.2 Fugitive Emissions to air – dust, mud and litter

The principal sources of potential dust generation are likely to be from vehicle movements. There are no treatment operations and once placed in the storage bay, dust is unlikely to be generated.

Table 1 sets out the measures that shall be undertaken to control and monitor the release of any dust and fibres.

Table 1 – Measures to Control and Monitor the Release of Dust and Particulates

Measures	Specification	Requirements
Physical containment	Concrete Bay Walls	The bulk storage facility has 6m high concrete bay walls around three sides of the permit boundary. There are internal bay walls at 2.4m high. The waste will be stored with at least 0.5m freeboard.
Controls	Limiting the speed of site vehicles	Speed limit within port roads is 20mph. Speed limit within permit boundary will be 5 mph. Vehicles are not constantly manoeuvring within the storage bays. Vehicles are only present during unloading and loading.
	Regular sweeping / damping down with hoses of the site areas and road.	Damping of the site using hoses during dry weather conditions.
Monitoring of aerial emissions	Visual monitoring of aerial emissions at the site boundaries shall be carried out by staff. Monitoring shall be conducted at random time intervals throughout the day.	TCM / supervisor or other nominated responsible person to monitor for dust, at random intervals outside the permit boundary.
Actions	Sweeping of the impermeable surface Damping of site vehicle access route, manoeuvring areas using water hoses.	Increase frequency as required and depending on weather conditions.

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The site will take account of the weather conditions and operate the hoses on a needs must basis throughout the operational day. Records of weather, and actions will be made in the site diary.

A Dust Management Plan has been provided as a separate report, EMS-OP-03.

4.2.1 Odour

The waste being handled has a low likelihood of producing odour. However, the glass received from MRFs, may contain residual organic matter.

An Odour Management Plan has been provided as a separate report, EMS-OP-02.

4.2.2 Noise and Vibration

The permitted site is in a busy industrial, port estate. The nearest houses are over 200m from the site, separated by other industrial users and the A259.

The houses are also located at a higher ground level, with the A259 providing a main source of noise.

A Noise Impact Assessment has been prepared as well as a Noise Management Plant, EMS-OP-05.

Good practice will be implemented as summarised in Table 2.

Table 2 – Noise Management Procedures

Measures	Specification
Operational procedures	Operations during working day time hours. Reduce drop heights when loading. Low scale operation. No treatment.
Physical containment	Storage bay within 6m high concrete bay walls, with a front containment wall. Maintenance of site entrance and site surfaces. Limiting vehicle speeds. Plant maintained in accordance with manufacturers recommendations. Engines switched off when not in use. Plant and machinery only used at the permitted site when loading / unloading. No constant use of machinery.
Noise monitoring	Not necessary. No history of noise complaints.

4.3 Fugitive emissions to groundwater

The site shall be operated so that there will be no point source emissions to ground, surface water, air or land.

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The site has an impermeable surface with sealed drainage.

Spill kits are kept at the Port Office. Staff will be trained in the use of the spill kits. The Site Supervisor will check the spill kits and will replace if any are used.

4.4 Potentially Polluting Leaks and Spillages

No fuel is kept on the site.

Minimum use of plant and machinery.

Any minor spillages of liquid wastes or oil shall be cleaned immediately, using sand or appropriate spill kits. In the unlikely event of a major spillage, immediate action shall be taken to prevent contamination entering surface water. The contamination shall be cleared immediately and placed in sealed containers. The Environment Agency shall be informed immediately, and the details of the event recorded in the site diary.

4.5 Pests, Vermin and Birds

The site will only handle waste glass.

With exception of 191212, all other glass will be inert and clean, with a low likelihood of attracting pests, vermin and birds.

The waste coded 191212 will include glass that has been separated at a Materials Recycling Facility. It can contain small volumes of cardboard, plastic and cans, which are other items separated at MRFs. However, it can also contain a small volume of organic matter. Such matter may be the residual contents from food cans or plastic/glass containers.

There are waste acceptance procedures at the site and MRF which are designed to minimise the presence of non-compliant waste. However, the original source of the waste is from householders. The Waste Disposal Authorities encourage householders to only place the correct items for recycling in their recycling bin and request that it is clean and dry. These efforts help to minimise contamination, but it is not guaranteed.

At the MRF, the mixed dry recyclables go through a complex of sorting to separate the different waste streams. The residual contents of cartons, cans and other containers may remain on the glass when it arrives at Shoreham.

An inspection of stored waste for vermin/birds shall be carried out at a minimum weekly frequency by the TCM / supervisor and shall be recorded in the site diary.

The site based staff at Shoreham Port will report the presence of any birds or other vermin at the point of detection, to the TCM.

On detection or notification of pest infestation, immediate action shall be taken to secure the attendance of a professional pest control contractor to eliminate the pest infestation. The incident and remedial action shall be recorded in the site diary.

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4.6 Climate Change

A Climate Change Risk Assessment has been completed and is provided with the Environmental Risk Assessment, see document SDL-SBS-ERA-V1.

4.7 Monitoring

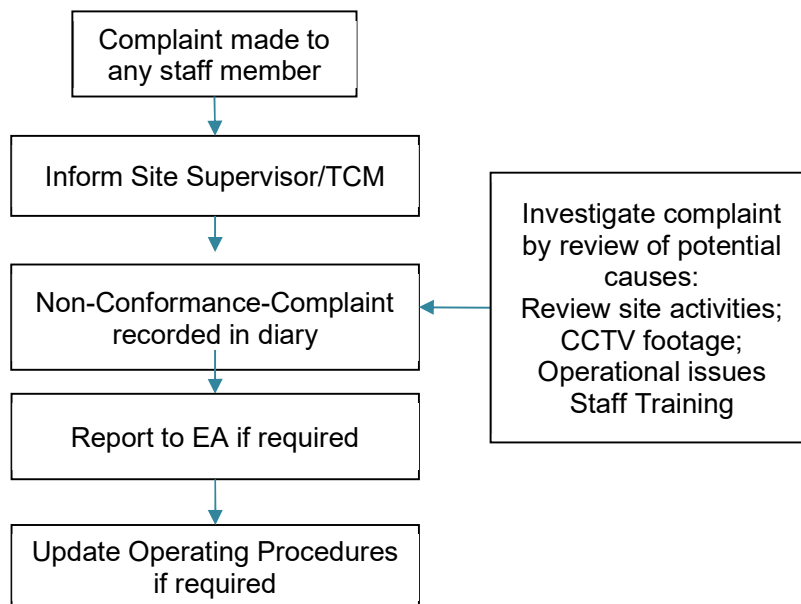
As there are no point source emissions to environmental media, monitoring is not required.

Site based staff will be trained to report any issues to the TCM. This will be on an ongoing basis.

Amenity monitoring will be carried out around the bulk transfer facility as set out in the Management Plans.

4.8 Complaints

Complaints may be reported to the TCM or Port Authority directly from a complainant, or from a regulator i.e. Local Planning Authority or Environment Agency. The TCM or Site Supervisor will carry out the following procedure in the event of a complaint being received.



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5. ADDITIONAL MEASURES

5.1 Raw material inputs

A bunded fuel tank will be provided off site.

5.2 Waste Minimisation Audit

The operation is primarily waste storage.

5.3 Waste Recovery or Disposal

The waste glass is destined for recycling.

5.4 Water Use

Water use will be minimal and only used for dampening down stockpiles and cleaning bays.

5.5 Energy Efficiency

Energy efficiency measures will be incorporated where possible into the day to day activities of the operations. The energy requirements for the site are low. There are no treatment activities.

Lighting is provided within Shoreham Port.

There is no site office.