



Wainwright Avonmouth Asphalt Facility, Rockingham Park

Environmental Management System

Summary

Summary

30th June 2023



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661B/Permit/01 Permit Plan

Appendices (not included with Summary)

Appendix A	Emergency Contact Details
Appendix B	Inventory of Equipment and Stores
Appendix C	Noise Management Plan
Appendix D	Organisation Responsibility Structure

1 Introduction

- 1.1 This Management System is a summary for the recycling operation Rockingham Park (the Facility) submitted as part of a Bespoke Permit application. The table of contents reflects all the headings that will be populated and within the EMS all paragraphs will be expanded as necessary.
- 1.2 This Management System Summary has been prepared by Land & Mineral Management, on behalf of John Wainwright & Co Ltd (the Operator), to accompany the 'Application for a Bespoke Environmental Permit to Recycle Waste Asphalt on land adjacent to the 'Wainwright Avonmouth Asphalt Facility, Rockingham Park, Smoke Lane, Avonmouth, Bristol, BS11 0FJ'.
- 1.3 The Operators owns and operates the Wainwright Avonmouth Asphalt Facility (the Asphalt Plant), which lies adjacent. The plant has been operational and has supplied asphalt products since 2016 to National Highways, local authorities, private contractors, construction companies and the collection trade.
- 1.4 The asphalt products are exported to customers by HGV. It is common for customers to over order. The resulting surplus waste asphalt must be transported to another site for storage and reprocessing into recycled asphalt products which are termed 'Recycled Asphalt Products' (RAP).
- 1.5 The resulting RAP is then transported back to the Asphalt Plant, by HGV, to use in the production of asphalt products. The use of RAP, in this instance, can replace up to 50% of primary won aggregate and bitumen.
- 1.6 The ability to use RAP in asphalt production reduces the reliance on primary won aggregate and bitumen resources which in turn reduces the environmental impacts associated with extraction, production and transportation.
- 1.7 The Operator is therefore seeking an Environmental Permit to recycle waste asphalt to produce RAP for use in the Wainwright Avonmouth Asphalt Facility on an existing adjacent yard (the Site).
- 1.8 The waste asphalt to be recycled will, principally, have resulted from customers overordering asphalt products produced at the Wainwright Avonmouth Asphalt Facility. In this instance the asphalt products produced at this plant will be transported to the customer by HGV. Any overordered asphalt products will have remained in this HGV until it is transported back to site for recycling into RAP.

- 1.9 To a lesser extent it is also proposed to accept road planings (waste asphalt) which have been removed to allow resurfacing. Waste asphalt that contains coal tar, which is hazardous, will not be accepted.
- 1.10 The Facility will receive a single waste type (17 03 02) which is defined as a non-hazardous bituminous mixture. A maximum of 50,000 tonnes of RAP will be produced per annum.
- 1.11 An Environmental Permit requires operators to prepare a written management system that identifies and minimise risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints. The permitted activity is to be carried out in accordance with the written management scheme. This document is an outline or summary of the EMS that will be in place when the facility is operational.
- 1.12 The Operator accepts responsibility for the environmental management and maintenance of the operations at. The Company is committed to the prevention of pollution whenever and wherever this is practicable and will seek to integrate environmental consideration in future business policy decisions.
- 1.13 Operator will regularly review all environmental aspects of the to achieve best environmental practice at this site acknowledge the responsibility of managing their environmental impacts of their activities, products and services and is committed to meeting all legislative requirements and standards which relate to environmental aspects.

2 Site Details

Site Location

Operator Details

John Wainwright & Co Ltd

Avonmouth Asphalt Facility, Rockingham Park, Smoke Lane, Avonmouth, Bristol, BS11 0FJ.

Tel no. 0117 244 1042

Competent Person - Matt Bishop.

Site Staff

2.1 To be included.

Emergency Contact Details

2.2 A full list of emergency contact details for the site will be provided in Appendix A.

Site Plan

2.3 Plan ref: 661B/Permit/01.

2.4 The Site is accessed from Smoke Lane.

2.5 A site identification board will be provided.

Plant

2.6 The mobile plant (not shown on the layout plan) which will be used during the operations is as follows:

- Excavator Volvo EC380 / EC220
- Loading Shovel Volvo L180 / CAT 962
- Mobile Crusher Terex I120 / Rubblemaster RM100
- Screen Terex 683

2.7 The mobile plant used in connection with the recycling area will be subject to change and may operate on a campaign basis.

2.8 An inventory of Equipment and Stores will be included in Appendix B.

Summary

3 Waste Acceptance Procedures

Pre-acceptance Procedures

- 3.1 Before arrangements are made to deliver the waste to the site, the waste producer or holder will be required to provide sufficient information to demonstrate that the waste has been properly assessed and classified in accordance with Technical Guidance WM3 'Waste Classification - Guidance on the classification and assessment of waste'.
- 3.2 The bulk of the waste accepted at the operations will be generated by the Applicant from overordered returned asphalt (Overorders).
- 3.3 Overorders is waste asphalt that has resulted from customers overordering asphalt products produced at the Wainwright Avonmouth Asphalt Facility. Here the asphalt products produced will have been transported to the customer by an Applicant owned HGV. Any excess asphalt product which is considered discarded by the customer and therefore must be considered as a waste.
- 3.4 The overordered waste asphalt will not have left the Applicant owed HGV which will transport it back to the Site for recycling into RAP. As a result, there can be surety that the Overorders are the correct single waste type, is from a known and reliable source and that it will not include contaminants such as hazardous materials like coal tar. Pre-acceptance Procedures are therefore not required prior to the acceptance of Overorders.
- 3.5 To a lesser extent it is also proposed to accept road planings (waste asphalt) which has been removed to allow resurfacing.
- 3.6 Waste asphalt that contains coal tar, which is hazardous, can be found in road planings. Coal tar was used as a binder in asphalt until the demise of coal fired gasworks in the mid-1980's and is known to be a carcinogenic hazardous substance.
- 3.7 As result the producer of road planings will be required to provide the Applicant with, where applicable/available, the following pre-acceptance information:
- Details of the waste producer/holder including their organization name, address and contact details;
 - Description of the waste;

- The waste classification code;
- Source of the waste;
- Nature and variability of the waste;
- Description of any odour;
- Details of the original construction of any carriageway or pavement requiring excavation so that the dates of construction can be used as an indication of the potential for coal tar to be present;
- Details of any maintenance works undertaken including the dates to indicate the types of material that may have been used;
- Information obtained during any intrusive investigations undertaken including results from testing and/or cores drilled; and
- Estimates of volumes.

3.8 The Applicant will only consider the acceptance of waste road planings where sufficient evidence is provided, as listed above, to provide assurance that it's the correct waste type which does not contain coal tar.

3.9 If, following the provision of the information listed above, the inclusion of coal tar cannot be ruled out, the results of further pre-acceptance testing will be required as follows:

- A dry section of the waste asphalt will be sprayed with a layer of white acrylic paint and the paint allowed to dry. Once dry, if its colour has changed from white to yellow/brown coal tar is likely to be present; and
- A PAK spray is sprayed onto the waste asphalt. If this turns a yellowish/light brown colour coal tar is likely to be present. If there is any doubt of visible discolouration, then an Ultra Violet lamp may be used. In this instance a yellow/green colour suggests that coal tar is present.

3.10 If the waste road planings fail these tests or the test are inconclusive, the waste producer will be required to provide test results from an accredited laboratory to confirm the presence of hazardous/non-hazardous materials.

- 3.11 Only waste road planings which pass these tests will be considered for acceptance at the operations.
- 3.12 All records relating to the Pre-acceptance Procedures will be kept for cross-reference a verification at the waste acceptance stage.
- 3.13 The Applicant will review the information required for the Pre-acceptance Procedures annually or if the following apply:-
- Waste changes;
 - Process giving rise to the waste changes;
 - Waste received does not to conform to the pre-acceptance information.

Acceptance Procedures

- 3.14 Waste will only be accepted if there is sufficient capacity at the Site and it has passed the relevant Pre-acceptance Procedures.
- 3.15 The delivery of waste will always be planned in advance with the delivery date agreed with the Applicant and the waste producer/holder.
- 3.16 All vehicles delivering waste will be licensed waste carriers and each delivery must be accompanied by a complete Waste Transfer Note consistent with fulfilling the Applicant's responsibilities under the Duty of Care Regulations.
- 3.17 All persons making deliveries of waste to the operations are to produce a certified copy of the Waste Carriage Authorisation Certificate on a quarterly basis to the Technically Competent Manager (TCM). If this certificate is invalid, the delivery of the waste shall be refused entry to the Site.
- 3.18 All waste deliveries will be directed to the weighbridge upon arrival at the Wainwright Avonmouth Asphalt Facility where the load will be weighed and the documents detailing the source and description of the waste provided. These documents will be inspected by the Weighbridge Office Manager to ensure that the correct information is provided to comply with the requirements of the Environmental Permit.

- 3.19 The Weighbridge Office Manager will make a record of the date and time of waste deliveries, quantities and the nature of the waste deposited at the site, the name of the company and their representative delivering (if applicable) each load of waste and the vehicle registration number.
- 3.20 If the driver is unable to produce a valid Waste Transfer Note they are to be refused entry to the Site.
- 3.21 The Weighbridge Office Manager will also undertake a visual inspection of the waste, to ensure that the description of the waste on the documentation provided matches the contents.
- 3.22 If the documentation provided at the weighbridge office is incorrect or the visual inspections indicate that the waste does not match the written description provided, the waste will be rejected.
- 3.23 If the document checks show that the waste is acceptable, the driver will be directed to the Site to unload.
- 3.24 The Site Manager will supervise the waste being discharged and a further inspection will be undertaken.
- 3.25 If following these inspections the waste does not match the written description provided during acceptance, the waste will be rejected.

Quarantined Wastes

- 3.26 In the event that wastes that are unsuitable for processing, due to not meeting the description of the approved waste type will be rejected.
- 3.27 Loads that have been deposited will be reloaded to the delivery vehicle and rejected.
- 3.28 The Environment Agency will be notified of the rejected load without delay.

4 Method of Operation

Waste Storage & Treatment

- 4.1 The operations allows for the reception, storage, treatment and recycling of asphalt waste materials, and the storage of product (RAP) for use in the adjacent Asphalt Plant.
- 4.2 Plan no: 661B/Permit/02 shows the layout of the operations.
- 4.3 It is proposed to erect three storage bays, two along the southern boundary and one larger bay along the northern boundary.
- 4.4 The larger northern bay will be used to store unprocessed waste asphalt.
- 4.5 The waste asphalt will be imported to the Site by HGV which will unload directly in the 'un-processed waste asphalt bay'.
- 4.6 Once a sufficient volume of waste asphalt has amassed it will be processed using a crusher. Waste asphalt is much weaker than rock or concrete, meaning the crusher is able to operate at a much a lower intensity to reduce the size of the lumps. As a result, the noise from the crushing is comparable to an excavator and or a loading shovel, which will be operating at the Site.
- 4.7 If required, the material will be screened.
- 4.8 The crushed/screened asphalt material will be stored in two smaller bays to the south of the Site.
- 4.9 It is estimated that crushing and screening will be undertaken for 5 working days per month.
- 4.10 An excavator and or a loading shovel will be used to load the crusher, fill the storage bays and load HGVs to transport material to the Asphalt Plant.
- 4.11 The production of the RAP will be subject to the protocol set out in the end of waste criteria for the production and use of aggregates from inert waste titled the 'Quality protocol: aggregates from inert waste'. This will ensure that the RAP has been fully recovered and can therefore be regarded as a non-waste product.

Operating Hours

- 4.12 The operations will operate 24 hours a day and seven days a week, in conjunction with the Asphalt Plant. This is necessary to meet the demands of customers such as the night-time highway networks.

Technically Competent Management

- 4.13 The Site is run by technically competent management with a Certificate of Technical Competence (COTC) to an appropriate level, or above.

Daily Site Inspection

- 4.14 Upon arriving at the start of each day, the staff will inspect the Site to ensure that there have been no incidents overnight.
- 4.15 Any defects identified by the initial inspection will be appropriately rectified by the staff.
- 4.16 On arrival at Site, vehicles are checked in accordance with the procedures in Section 3.

Weekly site inspection:

- 4.17 This will be carried out by the Site Manager or in his absence his appointed nominee.

5 Environmental Control Measures

5.1 The emissions and impacts are established in the Risk Assessment in Appendix F of the Environmental Permit Application.

Point Source Emission to Air

5.2 There would be no point source emissions to air as a result of the operations.

5.3 The only point source emissions relevant to this application are from mobile plant. In this instance, all plant utilised by the operations will be serviced and maintained in accordance with manufacturers recommendations providing control. This will ensure that the equipment is operated in an optimal condition to ensure emissions are in accordance with quoted specifications. As a result, further control measures are not required.

5.4 No specific monitoring required other than inspections to ensure compliance with servicing and maintenance schedules.

Point Source Emissions to groundwater

5.5 Possible transport through hardcore surface/soil into groundwater. Nevertheless, the permitted waste type does not include sludges or liquids and does not leach so no potential for contaminated rainwater run-off.

5.6 Control achieved through Waste Acceptance Procedure.

5.7 No specific monitoring required other than inspections to ensure compliance with the Waste Acceptance Procedure.

Point Source Emissions to Surface Water and Sewers

5.8 There would be no point source emissions to surface water or sewers.

5.9 No control or monitoring required.

Fugitive Emissions

5.10 Low risk of fugitive emissions from processing plant have been identified as a potential environmental risk resulting from the operations, as detailed in the Environmental Risk Assessment in Appendix C. This is a result of only one waste type being permitted, which has a very low risk of dust generation due to it being aggregate coated in bitumen and, therefore, highly unlikely to produce particulate matter.

- 5.11 The permitted waste type is also non-hazardous and does not consist of dust, powders or loose fibres.
- 5.12 HGVs and plant running on surfaced areas and the solid nature of the waste reduces possibility of fugitive emissions.
- 5.13 Control through the EMS including road sweeping and water bowing when required.
- 5.14 Crushing and screening subject to an LAPPC Permit (PGN 3/16 (12) which will control the release of fugitive emissions.
- 5.15 Daily visual monitoring to be undertaken and inspections to ensure compliance.

Control of Odours

- 5.16 Odours are highly unlikely to be generated due to the nature of the stored and processed materials.

Control of Noise

- 5.17 Less likelihood of an adverse impact established following BS 4142 Assessment in Appendix H of the Environmental Permit Application.
- 5.18 Control through a Noise Management Plan.
- 5.19 Monitoring following complaint is set out in the Noise Management Plan.

Control of Scavengers, Insects and Other Pests

- 5.20 The waste type is not attractive to scavengers, insects or pests as there is no biodegradable waste, or potential food sources.
- 5.21 Although no control or monitoring is required it is included in the EMS.

Control of Litter

- 5.22 Litter is not considered a risk due to the nature of the waste type.
- 5.23 If delivered loads contain excess litter, they will be rejected and the Environment Agency notified.
- 5.24 Although no control or monitoring is required it is included in the EMS.

Control of Mud and Debris

- 5.25 Mud and debris are highly unlikely due to the surfacing of the Site and the solid nature of the waste type.
- 5.26 Although no control or monitoring is required daily inspections for visible tracking of mud onto the public highway will be carried out. The results of the inspections will be recorded on the Site Mud Log. It is the responsibility of the Site Manager to appoint a competent person to carry out this task and ensure it is completed.
- 5.27 It is the duty of all site staff to remain constantly vigilant to mud being tracked out of the site during normal operations and raise awareness of this issue should it arise to the Site Manager. Any activities causing excessive mud on the site and therefore resulting in it reaching the public highway, will be immediately suspended until the appropriate measures are implemented and the mud is brought under control.

6 Contingency Provisions

- 6.1 The Site pause processing material if conditions prevent normal working methods leading to an unacceptable as risk of pollution or emergency situations, until normal working conditions can be resumed.

Investigation of Incidents

- 6.2 Any incident or shutdown will be investigated by the site management team to establish the reasons and, where possible, instigate measures to prevent repeat occurrences.

Summary

7 Emergency Procedures

Immediate Response

7.1 Where appropriate to an accident, the immediate actions shall include:

- Raising the alarm if human health or safety is at risk;
- Contacting Emergency Services; and
- Contacting the Environment Agency in the case of an environmental accident.

Secondary Actions

7.2 The appropriate procedures will depend on the nature of the accident and the potential events / failures that could lead to an environmental accident and their possible consequences, together with the secondary actions to be taken to deal with the accident.

Reporting

7.3 All accidents on Site are immediately reported to the Site management within 30 minutes of occurrence as per the Near Hit / Accident report policy. Full details of any accident which causes or could cause damage to human health and / or the environment are recorded in the Site Diary.

Investigation of Accident

7.4 The accident / shutdown will be investigated by management to establish the reason(s) for the accident and review the appropriateness of the actions taken. The investigation will, where possible, instigate measures to prevent repeat accidents.

Likelihood of Unmitigated Risks

7.5 Given the nature of the operations and the mitigation and response measures that are in place at the Site, the likelihood of an accident occurring that would impact the environment is low.

Review

7.6 This Management System, including all procedures herein, will be reviewed by Management on an annual basis.

8 Environmental Accidents

8.1 Although the likelihood of occurrence is deemed low, potential accidents that could lead to pollution to water or land include:

- Run off from unintentionally accepted hazardous wastes;
- Failure of vehicles and plant e.g. oil spill and fuel leak;
- Inappropriate repair, maintenance and fuelling of vehicles and plant.

8.2 The potential consequences of these accidents could cause pollution of:

- Adjacent water courses;
- Surrounding land;
- Groundwater.

8.3 In response to an accident, the following actions will be instigated by the site staff as appropriate to the incident:

- Isolate and remove hazardous waste as per waste acceptance procedures;
- Immediate use of spill kits with measures taken to stop any leakage. Cleaning up using the appropriate oil spill material and disposing of as Hazardous Waste. The incident will be reported with an after-spill analysis occurring which will help find out the cause of the spill & prevent it happening again.

8.4 The accident shall be fully recorded and, if appropriate, the accident will be reported to the Environment Agency immediately.

8.5 The risk of fire at a facility only handling a single non-hazardous non-flammable bituminous waste type is very low.

9 Communications and Record Keeping

- 9.1 Senior Management will ensure that the Management System, and any updates or reviews, are communicated to all staff and contractors involved in the operation of the site.
- 9.2 The Site Manager will ensure a full and up to date copy of this Management System and Environmental Permit is available in the Site office.

Daily & Weekly Booking Records Relating to the Reception of Waste

- 9.3 The Site Manager will be responsible for the completion of the daily and weekly sheets relating to the volumes and where appropriate weights of waste that are accepted on Site. The only other authorised persons allowed to complete these sheets will be the TCM and the Site Manager. As each load is accepted onto the Site from third parties the daily booking sheet shall be completed with the following details:

- Where the waste originated from on a county basis;
- The volume and weight of the waste received;
- The Controlled Waste Transfer Note and the EWC code and type of waste from the consignment note; and
- The driver's name.

- 9.4 While it is expected that the bulk of waste accepted will be generated by the Applicant (i.e., overordered returned asphalt) and delivered in Applicant owned HGVs, it is extremely likely that some third parties waste will also arrive at the facility. The weekly record is to show the volumes delivered and accepted from each company are to be recorded separately showing the total volumes and weights of all wastes received.

- 9.5 The information recorded shall be used by the Applicant for the completion of the Quarterly Returns to the Environment Agency. These returns shall show details of all wastes received at the operations.

Records of Wastes Received

- 9.6 All records shall be stored at the Site office in the Wainwright Avonmouth Asphalt Facility at Rockingham Park.

- 9.7 Records of the Pre-acceptance Procedures will be kept for a minimum of 3 years.
- 9.8 All Controlled Waste Transfer Notes shall be kept for a minimum of 2 years after the receipt of the waste and made available for inspection by the Environment Agency at any reasonable time.
- 9.9 The Daily and Weekly Records shall be kept for a minimum period of 3 years.
- 9.10 The Quarterly and Annual Returns to the Environment Agency shall also be kept for a minimum period of 5 Years.
- 9.11 All the above records shall be made available for inspection by the Environment Agency at any reasonable time.

Recording of Accidents, Incidents and Complaints

- 9.12 A site diary would be kept in the site office, and this would be updated daily. The diary would be used to record any accidents, incidents or complaints. This would provide an ongoing record throughout the period of the operations, and this would enable any investigative or corrective action that may be required.
- 9.13 The Environmental Permit and other documents containing information regarding the operations would be kept in a convenient location, allowing access for any person that may be working at or visiting the site.

Maintenance of records

- 9.14 The site diary would be maintained and updated to include the following:-
- The name of the technically competent person in attendance;
 - Weather conditions; Details of all visitors, including their status and times of arrival and departure;
 - Details of maintenance, modification, repair, replacement, delivery and return, and breakdown of any plant and machinery;
 - Damage to vehicles, fences, gates, etc. and incidents of trespass; and
 - Details of any complaints or environmental/health and safety incident.

Complaints

- 9.15 Following receipt of an external complaint, a complaint form, will be completed by the Site Manager and sent to the Compliance Manager. The complaint will be investigated within 5 days noting cause and action to prevent it arising again. The complainant will be kept informed throughout the investigation. This information will be made available to the Environment Agency as required.

Summary

10 Management, Site Staff and Training

Management

- 10.1 An organogram illustrating the management of the recycling site will be appended in a full version of this EMS.
- 10.2 An audit of the site's performance against the Management System will be carried out by the Environmental Manager.

Site Management

- 10.3 Direct responsibility for implementing the Management System is held by the Technically Competent Management.

Operational Staff

- 10.4 All Site staff receive a Site Induction when they commence on Site.

Training

- 10.5 The Site staff will be suitable trained in their roles and responsibilities with on-site training by the Technically Competent Management, to ensure that they conduct their duties in compliance with the Management System.
- 10.6 The training programme will ensure that all relevant staff will be aware of the following:
- 10.7 Management will periodically review the Company's environmental policy and objectives.

Summary