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| Pest Management Plan  Waste Transfer Station  ETM Recycling Ltd |

ETM Recycling Facility

Cater Road,

Bishopsworth,

Bristol,

BS13 7TT

**Document Control**

|  |  |
| --- | --- |
| **Document Title** | Pest Management Plan |
| **Revision** | 1.0 |
| **Date** | 31/03/2025 |
| **Document Reference** | ETM Cater Rd PMP 31-3-25 |
| **Prepared For** | ETM Recycling Ltd |
| **Authored By** | MTS Environmental Ltd |

**Quality Control**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Revision No.** | **Date Revised** | **Amendments** | **Authored By** | **Sign Off** | **Approved By** | **Sign Off** |
| 1.0 | 31/03/25 | Original draft | Joanna Antoszkiewicz |  | Luke Bridges |  |

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# Introduction

## General

1.1.1 This document was prepared by MTS Environmental Ltd on behalf of the Operator, ETM. This Pest Management Plan (“PMP”) has been prepared for ETM Recycling Ltd for their waste installation facility at Cater Road, Bishopsworth, Bristol, BS13 7TT. The PMP was prepared in accordance with Environmental Agency guidance.1 The site will be operated as a household, industrial & commercial (HIC) waste transfer station with treatment of wastes for energy from waste.

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

ETM Recycling Ltd, Cater Road, Bishopsworth, Bristol, BS13 7TT

Tel: 0117 953 3654

1.1.3 The site is operated in accordance with an Environmental Management System (EMS) and Fire Prevention Plan (FPP) along with other documents targeted to specific environmental considerations including this PMP.

1.1.4 This PMP will allow ETM Recycling Ltd 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.

## 1.2 Site location

1.2.1 The site is located at Cater Road, Bishopsworth, Bristol, BS13 7TT. The approximate national grid reference for the site is ST 57464 68764.

1.2.2 The site is located on an industrial park alongside multiple other commercial and industrial establishments. The nearest residential building sits ~105m away from the centre 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 with treatment. A substantial permit variation application has been submitted to the EA (Permit Number: EPR/JP3793FP) for the following reasons:

* To change the limits of activities and treatments on site in accordance with EPR 1.16.2.3 – Section 5.4 (a)(iii) and (b)(ii) – non-hazardous waste installation – pre-treatment for incineration or co-incineration.
* To include a modern noise condition and an updated management condition
* To increase annual throughput tonnage to 75,000.

1.3.2 Waste will be stored both inside the covered building on the north of the site and outside in the open yard in covered storage bays of all incoming waste material. The building stores all POPs waste, shredded POPs waste and combustible waste segregated into stockpiles.

1.3.3 The location of the operational areas and storage areas are shown on Drawing No. CR-MTS-DR-PL-0002 which is presented in Appendix A.

## 1.4 Waste Types and Quantities

1.4.1 The waste types handled on site will be household, commercial and industrial wastes as defined in the Controlled Waste (England and Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990.

1.4.2 The maximum amount of waste to be stored on site at any one time is 5,000 Tonnes.

1.4.3 If the maximum storage capacity is reached then no further waste will be accepted until waste can be removed from the site and taken to a suitably permitted or exempt site.

1.4.4 There are four key storage areas as shown on the plan (plan ref - CR-MTS-DR-PL-002). All POPs related waste will be stored within the enclosed building, the two external bays will be used to store typical non-hazardous construction wastes.

1.4.5 The table overleaf details a summary of the main waste types which will be accepted and stored at the site, the rows highlighted in red are considered to be those wastes which have the potential to create pest occurrences. The waste types shown below are those derived from the site permit.

**Table 1.1** - Waste storage table for wastes with pests potential

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Description** | **Common pest potential EWC codes likely to be stored/ accepted on site** | **Storage type** | **Containment** | **Height/ width of firewall (m)** | **Max duration of storage** |
| POPs Storage | 20 03 01 / 20 03 07 | Unprocessed | Enclosed Building | Contained within the proposed building as shown in the plan | 6 months |
| Shredded POPs | 20 03 01 | Shredded and sorted using over band magnets | Enclosed Building | 6 months |
| Bale Storage | 20 03 01 | Baled POPs materials | Enclosed Building | 6 months |
| Metal Skips | N/A | Metals Recycling Skip | Enclosed Building | 14 days |
| Whole PVC | N/A | Outdoor Bays | Outdoor covered storage bays with plastic on the front of the bays | 3.2 m high, scaffold roof | 1 year |
| Shredded PVC | N/A | Outdoor Bays | 3.2 m high, scaffold roof | 1 year |
| Wood | 19 12 07 – Potential for pests | Outdoor Bays | 3.2 m high, scaffold roof | 14 days |
| Paper and cardboard | N/A | Outdoor Bays | 3.2 m high, scaffold roof | 14 days |
| Textiles | 19 12 08 – potential for pests | Outdoor Bays | 3.2 m high, scaffold roof | 14 days |
| Concrete | N/A | Outdoor Bays | 3.2 m high, scaffold roof | 14 days |
| Glass | 19 12 05 – potential for pests | Outdoor Bays | 3.2 m high, scaffold roof | 14 days |
| Mixed construction and demolition | N/A | Outdoor Bays | 3.2 m high, scaffold roof | 14 days |
| Soil and stones | N/A | Outdoor Bays | 3.2 m high, scaffold roof | 7 days |
| Mixtures of concrete and bricks | N/A | Outdoor Bays | 3.2 m high, scaffold roof | 14 days |

1.4.5 The site could also accept other common waste types with pest potential which have not been listed in the table above. It is proposed if any of these wastes are discovered they would be stored in a segregated bay/container and removed from the site within 48 hours. Prior to hiring out a skip to the customer, the operator will request confirmation of the contents to be placed in the skip so in the event the below wastes are accepted, they can be stored and removed as detailed below.

|  |  |
| --- | --- |
| **European Waste Catalogue (EWC) – Commission Decision 2000/532/EC** | |
| **Code** | **Waste type** |
| **02** | **WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING** |
| **02 01** | **wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing** |
| 02 01 03 | plant-tissue waste |
| 02 01 04 | waste plastics (except packaging) |
| **02 02** | **wastes from the preparation and processing of meat, fish and other foods of animal origin** |
| 02 02 03 | materials unsuitable for consumption or processing |
| **02 03** | **wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation** |
| 02 03 04 | materials unsuitable for consumption or processing |
| **02 04** | **wastes from sugar processing** |
| 02 04 01 | soil from cleaning and washing beer |
| 02 04 02 | off-specification calcium carbonate |
| **02 05** | **wastes from the dairy products industry** |
| 02 05 01 | materials unsuitable for consumption or processing |
| **02 06** | **wastes from the baking and confectionery industry** |
| 02 06 01 | materials unsuitable for consumption or processing |
| 02 06 02 | wastes from preserving agents |
| **02 07** | **wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)** |
| 02 07 01 | wastes from the washing, cleaning and mechanical reduction of raw materials |
| 02 07 02 | wastes from sprits distillation |
| 02 07 04 | materials unsuitable for consumption or processing |
| **03** | **WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE PULP, PAPER AND CARDBOARD** |
| **03 03** | **wastes from pulp, paper and cardboard production and processing** |
| 03 03 07 | mechanically separated rejects from pulping of waste paper and cardboard |
| 03 03 10 | fibre rejects, fibre-, filler- and coating-sludges from mechanical separation |
| **04** | **WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES** |
| **04 01** | **wastes from the leather and fur industry** |
| **07** | **WASTES FROM ORGANIC CHEMICAL PROCESSES** |
| **07 02** | **wastes from the MFSU of plastics, synthetic rubber and man-made fibres** |
| 07 02 13 | waste plastic |
| **09** | **WASTES FROM THE PHOTOGRAPHIC INDUSTRY** |
| **10** | **WASTES FROM THERMAL PROCESSES** |
| **10 02** | **wastes from the iron and steel industry** |
| 10 02 14 | sludges and filter cakes from gas treatment other than those mentioned in 10 02 13 |
| 10 02 15 | other sludges and filter cakes |
| **10 03** | **wastes from aluminium thermal metallurgy** |
| 10 03 26 | sludges and filter cakes from gas treatment other than those mentioned in 10 03 25 |
| **10 04** | **wastes from lead thermal metallurgy** |
| 10 04 10 | wastes from cooling-water treatment other than those mentioned in 10 04 09 |
| **10 07** | **wastes from silver, gold and platinum thermal metallurgy** |
| 10 07 05 | sludges and filter cakes from gas treatment |
| **10 08** | **wastes from other non-ferrous thermal metallurgy** |
| 10 08 18 | sludges and filter cakes from flue-gas treatment other than those mentioned in 10 08 17 |
| **10 11** | **wastes from the manufacture of glass and glass products** |
| 10 11 18 | sludges and filter cakes from flue-gas treatment other than those mentioned in 10 11 17 |
| **10 12** | **wastes from the manufacture of ceramic goods, bricks, tiles and construction products** |
| 10 12 05 | sludges and filter cakes from gas treatment |
| 10 12 06 | discarded moulds |
| **10 13** | **wastes from manufacture of cement, lime and plaster and articles and products made from them** |
| 10 13 07 | sludges and filter cakes from gas treatment |
| **11** | **WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO-METALLURGY** |
| **11 01** | **wastes from chemical surface treatment and coating of metals and other materials (for example galvanic processes, zinc coating processes, pickling processes, etching, phosphating, alkaline degreasing, anodising)** |
| 11 01 10 | sludges and filter cakes other than those mentioned in 11 01 09 |
| **11 05** | **wastes from hot galvanising processes** |
| 11 05 01 | hard zinc |
| 11 05 02 | zinc ash |
| **15** | **WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED** |
| **15 01** | **packaging (including separately collected municipal packaging waste)** |
| 15 01 01 | paper and cardboard packaging |
| 15 01 02 | plastic packaging |
| 15 01 05 | composite packaging |
| 15 01 06 | mixed packaging |
| **17** | **CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)** |
| **17 09** | **other construction and demolition wastes** |
| 17 09 04 | mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03 |
| **19** | **WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE** |
| **19 05** | **wastes from aerobic treatment of solid wastes** |
| 19 05 01 | non-composted fraction of municipal and similar wastes |
| 19 05 02 | non-composted fraction of animal and vegetable waste |
| 19 05 03 | off-specification compost |
| **19 12** | **wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified** |
| 19 12 04 | plastic and rubber |
| 19 12 12 | other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 |
| **20** | **MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS** |
| **20 01** | **separately collected fractions (except 15 01)** |
| 20 01 08 | biodegradable kitchen and canteen waste |
| 20 01 39 | plastics |
| **20 02** | **garden and park wastes (including cemetery waste)** |
| 20 02 01 | biodegradable waste |
| **20 03** | **other municipal wastes** |
| 20 03 01 | mixed municipal waste |
| 20 03 02 | waste from markets |
| 20 03 03 | street-cleaning residues |

1.4.6 It must be noted the above wastes are not routinely accepted or stored at the site and therefore do not have a specific storage location. If any of the above wastes are discovered following tipping, they will be stored in a segregated bay or sealed skip and removed from the site within 48 hours.

## 1.5 Site management

1.5.1 The Technically Competent Manager (TCM) at the site is 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. They will be on site for at least 20 % of site operational hours.

1.5.2 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.

## 1.6 Types of pests

1.6.1 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:

|  |  |  |  |
| --- | --- | --- | --- |
| https://upload.wikimedia.org/wikipedia/commons/1/14/Common_house_fly,_Musca_domestica.jpg | Common housefly *Musca domestica* Medium | http://www.ozanimals.com/image/albums/australia/Insect/lesser-house-fly.jpg | Lesser housefly *Fannia sp.* Medium |
| https://upload.wikimedia.org/wikipedia/commons/thumb/a/ac/Megaselia_scalaris.jpg/220px-Megaselia_scalaris.jpg | Scuttle fly *Phoridae* ‘Black-eyed’ |  | Scuttle fly *Phoridae* ‘Black-bodied’ |
| http://www.getridoffliesguide.com/wp-content/uploads/2013/08/Drain-Fly.jpg | Drain fly *Psychodidae* small |  | Fruit fly  *Drosophilidae* small |

1.6.2 Common house flies are readily distinguished from the other smaller fly species that are likely to be captured on traps at ETM Recycling Ltd. 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.

1.6.3 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:

1. 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.
2. 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 – 350 C), after which they pupate.
3. 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.
4. 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 (350 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.

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

1.6.5 Scavenging Birds – Given the possibility of small amounts of potentially putrescible wastes at the site, scavenging birds 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 <200 m |

## 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 1000 m of the site

|  |  |  |  |
| --- | --- | --- | --- |
| **Boundary** | **Sensitivity of Receptor** | **Receptor** | **Approximate distance from centre of site (m)** |
| North | High | Bishopsworth Road Allotments | 40 |
| North | High | Residential – Headley Lane | 105 |
| West | High | Residential – Whitchurch Rd | 165 |
| East | Medium | Residential – Brookdale Rd | 225 |
| South | Medium | Residential – Hareclive Rd | 395 |
| North east | Medium | Headley Park Community Centre | 265 |
| South/ East | High | Cater Business Park | 0 |
| East | Medium | Imperial Park Shopping Centre | 710 |
| North east | Medium | Headley Park Primary School | 310 |
| South/ West | Medium | Care homes (Bishopsmead Lodge Care home & MHA Hartcliffe Nursing Home) | 620-760 |
| North/ South/ West/ East | Medium | Schools in the area (7x) | 500-960 |

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 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.

3.1.3 Bales are stored within a covered building with roller shutter doors which are shut when the site is non-operational to prevent the entrance of pests.

## 3.2 Foul surface water

3.2.1 The drainage system shown on CR-MTS-DR-PL-0002 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 B.

# 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.

## 4.2 Pre-acceptance Checks

4.2.1 The driver collecting the skip will be trained (by site management) to identify any loads in the skip which could have the potential generate pests and following an initial assessment, the driver will load the skip onto the wagon. If any wastes with pest potential are discovered, the driver would report back to site management who would contact the customer who would need to declare the contents inside the skip. Site management would then decide whether or not to accept the skip. This should prevent any wastes with pest potential being accepted at the site.

## 4.3 Waste Acceptance Procedure

4.3.1 Strict waste acceptance procedures are in place at the site as shown below and the following details will be recorded for every load deposited at the site:

1. The date and time of delivery.
2. The name and address of the waste producer.
3. The detailed and accurate description of the waste including type, quantity (in tonnes and/or cubic metres) and EWC codes.
4. How the waste is contained e.g. loose, container type.
5. The carrier's name and address.
6. Driver’s name, signature and vehicle registration No.
7. Signature or initials of person(s) producing/ accepting/ inspecting/ carrying the waste.
8. Additional handling details/notes made by the driver after inspection of the load.
9. SIC code of the premises which produced the waste (where relevant).
10. Waste hierarchy declaration.
11. Information on previous treatment of the waste e.g. manual or mechanical.

4.3.2 During the initial check of the load the weighbridge, the skip will undergo a further visual inspection and if the load contains significant amounts of odour the load will be and returned to source. If small levels of pests are noted, the waste would still be tipped and the waste would be handpicked placed in a quarantine skip inside the building and removed within 48 hours.

4.3.3 Once a mixed load of waste is tipped, contamination may still be present so the banksman / driver photographs the load before processing. This system is used to prove the presence of contrary items or misdescription, to enable the sales team to levy additional costs on the customer for their correct handling.

## 4.4 Receiving wastes

4.4.1 Rigorous control of wastes delivered to the site is required, with contaminated or wastes with pest potential (stored too long) will be rejected in line with the procedures in the EMS and EP. Trained competent staff are in place to recognise 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.

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

4.4.3 Incoming waste will be processed as soon as practicably possible to ensure that any food related or other wastes with pests potential are contained within the transfer building (which were not identified during deposit) can be identified, isolated inside a sealed container and rejected as soon as practicable.

4.4.4 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.

4.4.5 **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.

4.4.6 **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:

1. 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.
2. 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 in the site diary.
3. 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.
4. 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.
5. A third occurrence would require director-level intervention to discuss termination of the contract due to non-conformances.

## 4.5 Storage of Wastes

4.5.1 The site may store the following wastes which could be regarded as those which could present pest issues at the site and the table below details how they will be handled and stored on site:

1. Incoming mixed waste – (20 03 01, 20 03 07) – Stored in enclosed buildings
2. Separated Metals Waste – Metals Skip
3. Residual landfill waste – (19 12 12) – Outdoor Storage Bays (Enclosed)
4. RDF processed and shredded (19 12 10) (Shredded POPs Stockpile)
5. RDF – baled (19 12 10) – Refer to Bale Storage Area

**Table 4.1** - Waste storage / monitoring for wastes with pest potential on site

|  |  |
| --- | --- |
| **POPs Storge– Incoming Bulky Waste** | * The waste in this stockpile is the main material processed on site. This is segregated at Ashton Vale site prior to being transferred to Cater Road, as a result this is thought to be free of any major contaminants. * The waste is tipped inside the enclosed processing building in the POPs Storage Area. * This is processed through the shredder on a conveyor belt, any metals which are present are separated and deposited in the metal skip. * Any waste identified after tipping which has the potential to cause pests i.e. a black bin bag, food waste, green waste, packaging with residues will be removed from the pile and stored in a mobile rejected waste container. The container will be removed off site within 48 hours. * Any large visible recyclables will be hand-picked or scooped using the loading shovel and placed into one of relevant storage bays at the site. * The stockpile is dynamic and, given the material throughput of the plant on site (70 tonnes per hour), waste will not be stored in this area usually for 12 hours (based on experience) but 5 days have been provided in the event of any extenuating circumstances. If the waste exceeds a period of 48 hours, the site will increase monitoring to three times every 12 hours. * If pests have been identified during monitoring, the site will investigate, find the root cause and quarantine the load in sealed containers inside the building which will be removed from site as soon as practicable. |
| **Shredded POPs Storage Bay** | * The waste in this stockpile is bulky waste following the shredding process and extraction of any recyclable/ recoverable material. * This is stored in an enclosed processing building to prevent any potential pests. The stockpile is stored on site for a maximum of 6 months (worst case), but is processed further using the baler before being transferred to an appropriately permitted facility. * This stockpile will be subject to daily monitoring, if pest waste is identified during monitoring, the site will investigate, find the root cause and quarantine the pest load in sealed containers inside the building which will be removed from site as soon as practicable. |
| **Metal Skips** | * Metals waste recovered from the processing of bulky wastes will be stored in a skip within the enclosed building. * The areas surrounding the skip will be subject to daily monitoring, if pest waste is identified during monitoring, the site will investigate, find the root cause and quarantine the pest load in sealed containers inside the building which will be removed from site as soon as practicable. * Metals skip waste is to be stored on site for no more than 14 days, if pest waste is identified within the skips these will be removed at the earliest practicable opportunity, typically 48 hours. |
| **External Storage Bays** – Residual (non- recyclable) waste | * These bays will be used for the storage of other wastes permitted to be accepted on site, specifically PVC, however they may be used when required to hold other segregated wastes such as construction and demolition wastes. * No wastes that have pest potential will be stored in these bays. * These wastes will be stored on site temporarily and as per the designated time periods stated in Table 1.1. * The bays will be subject to daily monitoring procedures, on identification of any malodourous waste these will be removed from site at the earliest practical opportunity. |
| **Bale Storage Area –** Baled RDF | * All waste is stored in bales and no free waste is stored inside the covered building. * The area will be visually monitored by staff 24/7 and once it reaches capacity or every 12 hours, the waste will be removed from site. * Baling reduces the odour from the waste and storage inside the covered building prevents odour escaping from the building. |

4.5.2 The above wastes have been derived from waste return figures and permitted wastes but if any other wastes with pest potential shown in section 1.4.5 are accepted, they will be tipped, sorted and stored inside the building. The storage of waste following assessment will be done so in a sealed container and removed from the site within 48 hours.

4.5.3 Waste will be stored to ensure compliance with the EP and as detailed in the EMS, FPP and this OMP document.

## 4.6 Stock rotation

4.6.1 For all wastes, the maximum storage timescales identified in Table 1.1 will be adhered to at all times as demonstrated in Table 4.1 above.

4.6.2 ‘Dynamic’ stockpiles in bays (i.e. stockpiles which are constantly added to – and removed from) will be deep cleaned once per week in accordance with the procedures outlined in Section 4.6 below.

## 4.7 Loading and transport of general wastes

4.7.1 All waste vehicles leaving the site containing putrescible and/or other potentially pest arising wastes will be securely sheeted or enclosed at all times.

## 4.8 Housekeeping

4.8.1 All storage areas highlighted in Table 4.1 as having the potential to give rise to pests/vermin, will be deep cleaned once per week. 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.

4.8.2 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.

4.8.3 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.

4.8.4 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 other potentially pest wastes/water.

## 4.9 Liaison with neighbours

4.9.1 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 B), 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.

4.9.2 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.

## 4.10 Training

4.10.1 All employees and sub-contractors of ETM Recycling Ltd 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).

4.10.2 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.

4.10.3 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:

1. Identification of fly species and fly biology
2. Monitoring techniques
3. Identification of problematic loads
4. Use of fly baits
5. Use/ handling of insecticide Use/ handling of larvicide
6. Use of spray & fogging systems
7. Personal protective equipment

4.10.4 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 ETM Recycling Ltd will use the following techniques to monitor pests:

1. Visual Monitoring
2. Complaints Monitoring
3. 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 B of the site’s EMS.

5.2.2 ETM Recycling Ltd 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 waste stockpiles where pests are present will result in the stockpile being loaded into a sealed skips and removed off site as soon as practicable. If skips or the destination site are not available immediately, a specialist pest control contractor will be contacted and brought in immediately to eradicate the problem.

5.5.7 If 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:

1. 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.
2. 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 (see EMS) 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 (seagulls 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 high levels (>10) of 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 the levels of scavenging birds shown above be identified during site monitoring, additional proofing buildings may be installed. These may include:

1. fitting fine mesh grilles to openings.
2. fitting bird repellent strips to reduce the availability of perching points for birds.
3. the use of netting to prevent birds roosting.
4. 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 B.

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:

1. Firstly identify the source; is it from:
   * 1. Site operations; or,
     2. An off-site source
2. If on site:
3. Report incidence to the site manager or technically competent manager;
4. If validated, the TCM will contact the appointed specialist pest control contractor and/or entomologist;
5. Identify the cause of the pests i.e. leakage, waste storage, etc;
6. Identify a solution in consultation with the specialist pest control contractor and/or entomologist;
7. Implement a solution, managed by the specialist pest control contractor and/or entomologist;
8. Carry out olfactory tests to check if fix is working;
9. Record actions taken in site diary as required by this plan;
10. 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:

1. Diversion/removal of wastes to suitable alternative facilities which 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 operating hours on 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 pests will be recorded on the site inspection form (EMS) 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. ETM Recycling Ltd 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 pests. 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, ETM Recycling Ltd 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.

# Appendices

## Appendix A: Site Layout Plan

A blueprint of a house

AI-generated content may be incorrect.

## Appendix B: Record Keeping Forms

**ETM RECYCLING LTD**

**REJECTED WASTE - RECORD FORM ETM/RF/2**

|  |  |
| --- | --- |
| **DATE** |  |
| **TIME** |  |
| **WASTE DESCRIPTION** |  |
|  |
| **QUANTITY OF WASTE** |  |
| **PRODUCER/HOLDER'S NAME, ADDRESS & TELEPHONE No.** |  |
|  |
|  |
|  |
|  |
| **NAME OF CARRIER** |  |
| **VEHICLE REGISTRATION** |  |
| **CARRIER REG. No.** |  |
| **REASON FOR REJECTION OF WASTE** |  |
|  |
|  |
| **ACTION TAKEN** |  |
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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **ETM RECYCLING LTD**  **SITE INSPECTION FORM (DAILY INSPECTIONS) – ETM/RF/4** | | | | | | | | | | | |
| **WEEK STARTING** | | |  | | | | | | | | |
| **TYPE OF INSPECTION** | | | **DAY** | | | | | | | | |
| **M** | | **T** | **W** | | **T** | **F** | **S** | **S** |
| SITE ENTRANCE/NOTICE BOARD | | |  | |  |  | |  |  |  |  |
| SECURITY - GATES | | |  | |  |  | |  |  |  |  |
| SECURITY - FENCING | | |  | |  |  | |  |  |  |  |
| SITE ROADS (CLEAR FROM HAZARDS) | | |  | |  |  | |  |  |  |  |
| IMPERMEABLE CONCRETE AREAS (INTEGRITY) | | |  | |  |  | |  |  |  |  |
| DRAINAGE SYSTEM FOR CONCRETE PADS | | |  | |  |  | |  |  |  |  |
| WASTE CONTAINERS & BAY WALLS | | |  | |  |  | |  |  |  |  |
| WASTE STORAGE LIMITS | | MIXED |  | |  |  | |  |  |  |  |
| WASTE STORAGE LIMITS | | SORTED RECYCLABLE BAYS |  | |  |  | |  |  |  |  |
| WASTE STORAGE LIMITS | | INERTS |  | |  |  | |  |  |  |  |
| WASTE STORAGE LIMITS | | NON-RECYCLABLE |  | |  |  | |  |  |  |  |
| CONTAINMENT OF REJECTED WASTE | | |  | |  |  | |  |  |  |  |
| NOISE LEVELS | | |  | |  |  | |  |  |  |  |
| FIRES (ANY INCIDENTS REPORTED) | | |  | |  |  | |  |  |  |  |
| NO SMOKING SIGNS IN PLACE | | |  | |  |  | |  |  |  |  |
| FUEL TANK/BUND | | |  | |  |  | |  |  |  |  |
| LITTER (ON SITE AND OUTSIDE SITE BOUNDARY) | | |  | |  |  | |  |  |  |  |
| DUST (VISUAL INSPECTIONS) | | |  | |  |  | |  |  |  |  |
| ODOUR (OLFACTORY INSPECTIONS - ODOUR MANAGEMENT PLAN) | | |  | |  |  | |  |  |  |  |
| VERMIN | | |  | |  |  | |  |  |  |  |
| RECORDS | | |  | |  |  | |  |  |  |  |
| COMPLAINTS RECEIVED | | |  | |  |  | |  |  |  |  |
| OTHER (SEE NOTES BELOW) | | |  | |  |  | |  |  |  |  |
| INSPECTION CARRIED OUT BY | | |  | |  |  | |  |  |  |  |
| **NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):** | | | | | | | | | | | |
|  | | | | | | | | | | | |
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|  | | | | | | | | | | | |
| **CHECKED BY** |  | | | **SIGNATURE** | | |  | | | | |
| **POSITION** |  | | | **DATE** | | |  | | | | |
| ***Sheet*** |  | | | ***of*** | | |  | | | | |

**ETM RECYCLING LTD**

**EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW - ETM/RF/6**

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **EMPLOYEE NAME** |  | | | | **DATE COMPLETED** | | |  | | | |
| **POSITION** |  | | | | **REVIEW DUE** | | |  | | | |
| **TRAINER** |  | | | | **OUTCOME** | **PASSED** | | | | |  |
| **POSITION** |  | | | | **FURTHER TRAINING REQUIRED** | | | | |  |
| **CARRIED OUT**  **/SIGN OFF >** | **Y/N** | **SIGNED BY**  **EMPLOY EE** | **SIGNED BY**  **TRAINER** |  | | | **Y/N** | | **SIGNED BY EMPLOYEE** | **SIGNED BY TRAINER** | |
| **ENVIRONMENTA L PERMIT** |  |  |  | **FIRE PREVENTION PLAN** | | |  | |  |  | |
| **MANAGEMENT SYSTEM** |  |  |  | **FIRE SAFETY** | | |  | |  |  | |
| **SITE RULES** |  |  |  | **EMERGENCY PROCEDURES** | | |  | |  |  | |
| **RECORD KEEPING**  **/ TRANSFER NOTES** |  |  |  | **STORAGE /PILE SIZE LIMITS** | | |  | |  |  | |
| **RECOGNITION OF WASTE TYPES** |  |  |  | **STORAGE DURATION** | | |  | |  |  | |
| **SECURITY** |  |  |  | **FIRE DETECTION** | | |  | |  |  | |
| **VEHICLE CHECKS** |  |  |  | **FIRE ALARMS** | | |  | |  |  | |
| **PLANT OPERATION** |  |  |  | **FIRE FIGHTING EQUIPMENT** | | |  | |  |  | |
| **PLANT CHECKS** |  |  |  | **FIRE WATER CONTAINMENT MEASURES** | | |  | |  |  | |
| **AMENITY - LITTER, ODOUR, PESTS ETC.** |  |  |  | **SPILL CLEARANCE** | | |  | |  |  | |
|  |  |  |  |  | | |  | |  |  | |
|  |  |  |  |  | | |  | |  |  | |
|  |  |  |  |  | | |  | |  |  | |
| **NOTES AND ACTIONS:** | | | | | | | | | | | |
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**ETM RECYCLING LTD**

**COMPLAINTS REPORT FORM (ETM/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 ETM/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:
   1. the nature of the complaint;
   2. the time;
   3. how long it lasted;
   4. how often it occurs;
   5. Is this the first time the problem has been noticed; and
   6. what prompted them to complain.
4. The person completing the form will then, if possible, make a note of:
   1. the weather conditions at the time of the problem (rain, snow, fog etc.);
   2. strength and direction of the wind; and
   3. 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 Environment Agency 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.