DUST & EMISSIONS MANAGEMENT PLAN

Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS

Recycling Lives Compliance Services Limited

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1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd have been instructed by Recycling Lives Compliance Services Limited (the operator) to prepare this Dust & Emissions Management Plan (DEMP).

1.1.2 This DEMP assesses the risk of dust associated with the storage and treatment of waste at Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS and provides mitigation and control measures implemented in relation to dust from waste operations undertaken at the site.

1.1.3 The permit boundary is illustrated in green on Drawing No. WORK/3421/02 Permit Boundary Plan. All reference to 'the site' in this DEMP refers to the associated operations, infrastructure, plant, and equipment within this boundary.

1.1.4 The following references which are used throughout this DEMP are defined below:

- **Prolonged rainfall** = 1 in 100-year flood event or <3 wet days.
- **High winds** = where wind speed reaches 4 on the Beaufort Wind Scale or if dust is being emitted beyond the site boundary following routine site inspection.
- **Dry Weather** = Three dry days or weather conditions exceeding 75^{o}F for more than one day.
- **Severe weather conditions** = The above and including dense fog, hail or snow.
- **Significant levels of dust** = Activities with the potential to emit dust beyond the site boundary.

1.2 Permit & Facility Overview

1.2.1 The site will be operated in accordance with Environmental Permit (EP) ref.FB3807SX. The EP authorises the acceptance, recycling and treatment of hazardous and non-hazardous metal waste (comprising of batteries) and WEEE.

1.2.2 This DEMP has been prepared for the purpose of a permit variation application for the following:

i) Increase the hazardous waste storage capacity to 5,000 tonnes at any one time.
ii) Add a new hazardous waste installation activity under section 5.3 Part A(1) (a)(ii) of the Environmental Permitting (England and Wales) Regulations for the physico-chemical treatment involving the mechanical sorting and mechanical treatment of hazardous waste (batteries).
iii) Reduce annual throughput of waste accepted at the site to 25,000 tonnes per annum. This will comprise of approximately 20,000 tonnes for battery recycling and 5,000 tonnes of WEEE waste.
iv) Remove the End-of-Life Vehicle (ELV) activity that is currently authorised including removal of the relevant conditions relating to this.

1.2.3 Treatment activities undertaken onsite consist of the following:

a) Manual sorting and separation.
b) Screening (using appropriate screening plant and vibrating conveyors).
c) Shredding (of batteries by chemistry).
d) Mechanical separation (via overband magnets and x-ray sorting).
e) Thermal processing (drying of shredded waste).
f) Air density separation (blower).
g) Ultra-sonic sieving.
h) Storage (prior to removal).

1.2.4 It is considered the main operation that dust emissions have the potential to arise from would be the shredding of batteries.

1.3 Contents of the Dust & Emissions Management Plan

1.3.1 This DEMP provides detailed information on the sources, risks and mitigation measures related to the potential dust emissions from the operations undertaken on site and has been prepared in accordance with the following guidance:

a) Environment Agency guidance "Control and monitor emissions for your environmental permit" February 2016 (updated June 2025).

1.3.2 The DEMP will allow the operator to implement an action plan should site operatives detect the presence of airborne dust escaping beyond the site boundary, receive complaints from local business or residents and should the EA suspect dust emissions from the site during an inspection.

1.3.3 The above guidance will be complied with through the implementation of this DEMP and procedures outlined within. In addition, the site is operated in accordance with a fully comprehensive Environmental Management System (EMS) which also contains procedures relating to dust.

1.4 Responsibility for Implementation of the DEMP

1.4.1 Ultimately the site manager is responsible for the implementation of the DEMP and for ensuring the mitigation strategies outlined in this management plan are in place and adhered to. Where the site manager is unavailable to oversee the implementation of dust suppression and mitigation strategies, a suitably experienced site operative or the technically competent manager (TCM) is delegated responsible.

1.4.2 All staff members have received the necessary training to deliver dust suppression measures and understand the contents and requirements detailed within this DEMP. Staff will undergo refresher training every 12 months or in the event of a dust complaint / issue or the implementation of operational changes.

1.5 Reviewing and Monitoring this DEMP

1.5.1 This DEMP will be reviewed on a biannual basis (every two years) or when a change in operation is deemed to have a potential effect on increasing dust emissions which could include any of the following:

a) Changes to operations (additional treatment activities).
b) Changes to site infrastructure (construction / removal of buildings).
c) Following a report or incident of dust emissions emitting beyond the permit boundary.

1.6 Relevant Legislation

Air Quality Management Area (AQMA)

1.6.1 The system of local air quality management (LAQM) was introduced under the Environment Act 1995. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within the relevant time period, the authority must designate an AQMA.

1.6.2 The site is not located within an AQMA boundary.

Low Emission Zone (LEZ)

1.6.3 Low Emission Zones (LEZ) are areas that have restrictions on the type and age of vehicles permitted in it, this prevents high level of pollution emitting vehicles from entering and operating within the zone with the aim of improving air quality. High polluting vehicles are required to pay a charge to enter the zone.

1.6.4 The site is not located within a low emission zone.

1.7 Hours of Operation

1.7.1 The site will be operated 24 hours a day 7 days a week.

1.7.2 During instances where the site is closed, access gates including building access etc will be locked and secured to prevent unauthorised vehicular or pedestrian access.

1.7.3 There is an overnight security guard /watchman who will be present on site between the following hours:

- 17:00 – 07:00 Monday – Friday
- 24 hours Saturday - Sunday

2 Sensitive Receptors

2.1 Meteorology

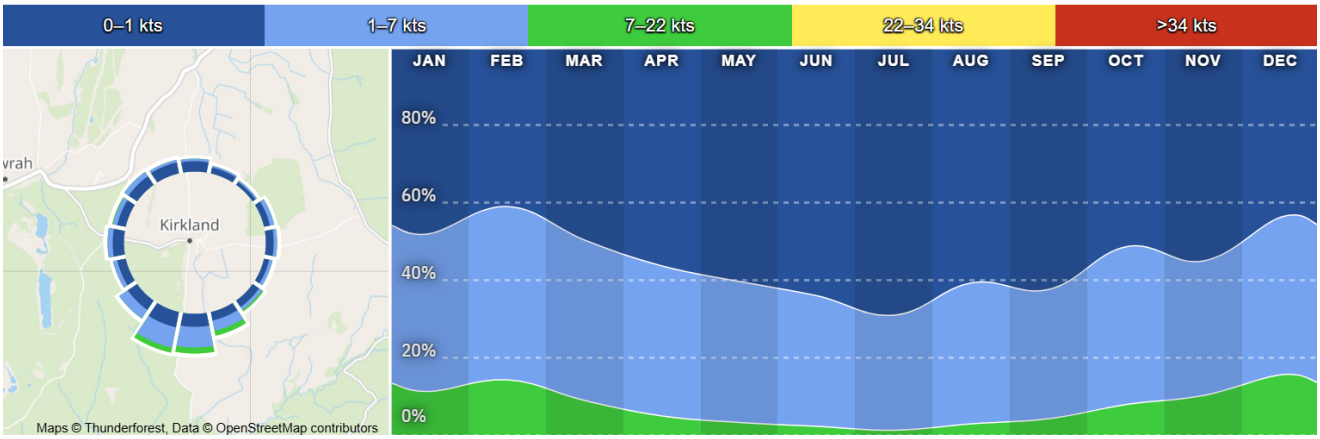
2.1.1 Unlike many other atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.

2.1.2 The prevailing meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site-specific microclimatic conditions. The most significant meteorological factor is the predominant wind direction and speed.

2.1.3 It is considered that receptors downwind of the site will have the highest potential to be impacted by dust potentially being emitted beyond the permit boundary as dust will be transported in the direction of the prevailing wind at the time of occurrence.

2.1.4 Wind speed and direction data have been obtained from Kirkland weather station which is considered to be representative of the typical conditions at the site. Daily recorded data for the period between 02/2011 – 08/2025 indicates that the predominant wind direction is from the south-south-west.

Figure 2.1 - Windrose from Kirkland weather station



2.1.5 As outlined in section 2.1.4, the predominant wind direction is from the south-south-west blowing towards receptors in the north-east which includes the Port of Workington and River Derwent.

2.1.6 A full list of receptors which are considered sensitive to dust within 1km of the site and would be impacted by dust emitting beyond the site boundary are included in Table 2.1.

2.2 Receptors

2.2.1 Receptors will have a varying sensitivity to dust depending on the receptor type. It is considered human receptors will have the highest sensitivity to dust; this includes receptors within close proximity to the site <250m where people spend a significant amount of time i.e. residential dwellings, workplaces, hospitals, schools and care homes.

2.2.2 A Receptor Plan has been prepared to illustrate the location of receptors within 1km of the site, see Appendix I, Drawing No. WORK/3421/04 Receptor Plan. As mentioned in section 2.1 above the predominant wind direction is towards the north-east, therefore, receptors listed below that are north-east of the site are most likely to be impacted if dust emissions were to escape beyond the site boundary.

2.2.3 Table 2.1 overleaf details the direction and distance from the boundary of the site to the boundary of the receptors within 1km of the site.

Table 2.1 - Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
GP Shipping - Workington	Northeast	230
Rural Payments Agency	South	350
BCMS	South	400
NNL (laboratory)	Southeast	435
Clay Flatts Industrial Estate	Southeast	900
Residential Dwellings		
Sea View (residential dwellings)	Southeast	155
Care homes (residential)		
n/a	n/a	n/a
Schools		
St Michaels Nursery & Infant School	East	930
Watercourses / Surface Water Features		
River Derwent	North / East	165
Irish Sea	West	335
Infrastructure (major roads and transport links)		
Northern railway line	East	700
Workington Train station	East	710
Ecological Sites		
Special Protection Area (Marine)	West	335
Recreational / Tourist Attractions		
Vanguard Sailing Club	Northeast	100
Workington Beach	West	250
Slag bank	Southwest	450
Workington Town RLFC	East	800

2.3 Other Dust and Emission Sources

2.3.1 It is considered there will be a natural production of dust from surrounding agricultural activities and farms. In particular the 'Fen Blows' which is the incidence of very strong winds, when it is not uncommon for soils from agricultural fields to be blown onto adjacent land.

2.3.2 Surrounding roads have the potential to produce dust from vehicles and maintenance issues i.e. potholes.

3 Site Operations

3.1 Waste Deliveries & Acceptance

3.1.1 The surfacing of the site is a mix of impermeable concrete and areas of compacted hardstanding. These surfaces will reduce the potential for dust emissions from waste deliveries (vehicle movements) by having a smooth surface that is significantly less likely to generate dust from unsurfaced areas. A 5mph speed limit will be enforced on site to further reduce the potential for dust generation from vehicle wheels.

3.1.2 To prevent mud being tracked off site onto public roads, mains water and hoses are available on site to wash vehicles wheels to prevent the resuspension of dust on the local roads. Site surfaces will also be regularly dampened to prevent dust. Any loose debris, water or muck is likely to be retained on site.

3.1.3 All vehicles entering / exiting the site will be sheeted / enclosed to minimise the likelihood of dust emissions. Loaded vehicles that are not sheeted will not be allowed to enter the site. Any third-party deliveries to the site will be advised that all loads must be suitably sheeted.

3.1.4 Strict waste acceptance procedures will be implemented on site to ensure that only suitable waste is accepted. Only the waste types detailed in the EP will be accepted onto the site for storage and treatment. Waste acceptance procedures will ensure that waste comprising solely dust, powders, or loose fibres are not accepted. For further information on the waste acceptance procedures see document ref. WORK-3421-A.

3.2 Site Infrastructure

3.2.1 The Site infrastructure is illustrated on Drawing No. WORK/3421/03, see Appendix I. The drawing illustrates the following areas on Site:

i) Different surfaces i.e. concrete, tarmac etc.
ii) Height/type of perimeter fencing.
iii) Reception and storage areas of waste.
iv) Location of fixed plant/equipment i.e. screener, shredder.
v) Existing dust mitigation techniques.
vi) Locations of mains water points and wheel washing/inspection areas.

3.2.2 It is considered operations with the highest potential to produce dust emissions will be undertaken within the enclosed building on site i.e. shredding of batteries.

3.3 Potential Dust Emissions

Waste Codes

3.3.1 It is not considered that any of the EWC codes accepted possess an inherently dusty nature whilst in their whole form, however, the process of shredding will produce fine particles as part of the mechanical breakdown of batteries into smaller fragments.

3.3.2 The EWC codes that will be subject to shredding are outlined in Table 3.1 below.

Table 3.1 – EWC Codes/descriptions with dust potential

EWC Code	Description
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 12 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 06 01*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	mercury containing batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
20 01 33*	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	batteries and accumulators other than those mentioned in 20 01 33

20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (6)
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

3.3.3 Reference should be made to the Risk Assessment Tables outlined in Section 5.7 and the control measures outlined in Section 4 for details of the handling procedures and mitigation measures in place for wastes stored at the site.

3.4 Overview of Site Operations

3.4.1 The operator predominantly accepts batteries for sorting and processing on site. Waste treatment operations are summarised below:

a) Prior to acceptance loads will undergo an initial visual inspection in AREA A to check for compliance with the EP and for any non-conforming wastes. This area will remain clear out-side of operational hours. During this initial inspection a handheld thermography (infrared) camera will be utilised to identify any abnormal heat signatures or developing hotspots. Any hotspots discovered are removed and isolated / quarantined.

b) Once accepted at the site, mixed loads will be stored in the appropriate storage area depending on source i.e. from HWRC's or AATF's etc…

c) Mixed batteries undergo an initial sort via the sorting machine which utilises a vibrating feeder to separate batteries by size and type, see Drawing No. WORK/3421/05. There are two sorting machines on site, one for incoming loads from HWRC's and the other for AATF's. Both lines of plant are identical and provide the same process but ensure batteries remain segregated by source.

d) The sorting machine deposits batteries by size / type into 60l containers beneath the vibrating grid. Any unspecified or larger batteries are deposited into separate containers for further processing via x-ray machine.

e) Following the initial sort described above batteries undergo further processing and sorting via an X-ray machine. An advanced X-ray system scans the batteries to identify their internal chemistry.

f) Batteries that have been sorted by chemistry will be stored in 1 tonne bulk bags with the exception of lithium batteries which will be stored in sealed barrels with

vermiculite. Sorted batteries will either be removed from site by chemistry or processed further via shredding.

g) Batteries to be shredded will be stored in AREA 10 prior to treatment. Shredding batteries breaks them down into smaller fractions allowing for separation of different materials within the battery such as metals, plastic and electrolytes.

h) Hazardous and non-hazardous batteries will be shredded separately to ensure there is no mixing of residual waste produced as part of the shredding activity.

i) Following shredding the plant utilises a vacuum dryer to remove any residual moisture. A vacuum pump is used to lower the pressure inside the dryer. By reducing the air pressure, the boiling point of residual moisture is lowered, allowing it to evaporate at lower temperatures.

j) The process of vacuum drying is particularly useful for removing moisture without applying excessive heat which could cause further adverse/chemical reactions. The controlled environment ensures that volatile organic compounds (VOCs) and harmful gases (if any) are safely removed without causing reactions that could lead to fires.

k) The end result following drying is dry shredded material with significantly reduced moisture content.

l) After vacuum drying, the material is processed through an air separator, which uses airflow to separate lighter materials (such as paper and plastic) from the heavier components. Paper and plastic are deposited into separate IBC containers ready for removal from site for further recycling or disposal.

m) The remaining material primary consisting of metals (ferrous and non-ferrous) is processed through an Eddy Current Separator (ECS). The ECS utilises a high sped rotating magnetic rotor to create a magnetic field causing non-ferrous metals to be repelled and deposited out of the main material stream. Separated ferrous and non-ferrous metals are deposited into IBC containers for further processing off site.

n) The final stage in the process utilises an ultra-sonic sieve. The sieve uses high-frequency sound waves to create very fine vibrations which separates black mass from any leftover residual material. Black mass is collected in a sealed IBC container beneath the processing line, separating the black mass allows for easier recovery keeping the black mass clean and free from contamination.

o) The above separated fractions will be stored in the appropriate storage areas as shown on Drawing No. WORK/3421/03.

3.5 Processed Waste Types/Product

3.5.1 Once waste has been subject to mechanical treatment, the finer shredded material will be stored in secure sealed IBC bulk containers prior to removal off site.

3.6 Mobile Plant and Equipment

3.6.1 All mobile and fixed plant on site and vehicles (including engines) will be maintained and serviced in line with manufacturers recommendations to ensure proper working order.

3.6.2 Table 3.2 details the plant / equipment available on site. Only trained operators will be permitted to drive / operate the plant / equipment listed below.

Table 3.2 - Plant & Equipment

Item	Number	Function
Forklift	*4*	Manoeuvring of waste batteries around the site
Pallet truck	*4*	Manoeuvring of waste batteries around the site
Screener (size grading system)	*2*	Sorts batteries based on physical dimension (size)
X-Ray screen	*1*	Separate batteries by chemistry
Shredder	*1*	Shredding of batteries to reduce material by size and further separate materials
Dryer	*1*	Removal of residual electrolytes and moisture after mechanical shredding
Air separator	*1*	Separate lighter fractions i.e. plastic, paper etc from the shredded material
Eddy current separator (ECS)	*1*	Magnetic separation of non-ferrous metal from non-metallic materials
Ultra-sonic sieve	*1*	Used to finely separate black mass from coarser materials

Note: The plant/equipment on site may vary and additional equipment may be hired-in to cope with busy periods, larger jobs or jobs with specific requirements.

3.6.3 A no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

4 Dust Management & Mitigation

4.1 Sources of Fugitive Dust / Emissions

4.1.1 The main dust/emission sources which arise from site are detailed in Table 4.1 below:

Table 4.1 – Dust emission source table

Source/Plan Ref	Description
Shredding activities	Output and storage of waste arising from treatment
Vehicle movements	Vehicles accessing/aggressing the site tracking dust on to or off the site. General vehicle or plant moving around the site causing the resuspension of dust particles from dry site surfaces.
Movement / handling of dusty waste	Loading waste materials on to vehicles for removal off site
Vehicles/plant/machinery	Particulate emissions from the exhaust of vehicles/plant/machinery on site (NO2).

4.2 Control Measures (general/staff training/daily inspections)

4.2.1 Good housekeeping and site practices are vital to ensure that the impacts from fugitive dust and debris impacts are controlled.

4.2.2 Daily inspections are undertaken on site in relation to the presence of dust / debris with corrective actions implemented upon discovery. Operational staff are suitably trained in procedures to keep the levels of dust /debris to a minimum including prevention and mitigation.

4.2.3 In dry and windy weather conditions recorded inspections will take place more frequently (up to three times a day). All inspections are visual and recorded on the Inspection Checklist, see Appendix II.

4.2.4 Areas where dusts are likely to arise or build up will be continuously monitored throughout the working day and cleaned on a daily basis; paying special attention to plant and equipment where dust is more likely to build up.

4.3 Housekeeping Schedule

4.3.1 The operator will avoid fugitive dust emissions by committing to the following housekeeping schedule:

a) Maintain a clean, well-organised site
b) Use suppression systems to dampen down site surfaces
c) Clean equipment that has been in contact with dusty materials
d) Carry out a deep clean of the reception / processing structure and external areas once a quarter and record this in the site diary

4.3.2 In the event of mud on local roads that has the potential to become dusty in hot and dry conditions, the operator will arrange for a road sweeper to be deployed on the surrounding roads. However, it is not considered likely due to the site being an impermeable surface.

4.4 Control Measures (boundary fencing / containment)

4.4.1 All waste operations are undertaken within the confines of an enclosed building. When shredding is being undertaken doors will remain closed to ensure no potential dust from operations is emitted outside the building.

4.5 Control Measures – site surfacing

4.5.1 The external yard where waste storage operations are undertaken comprises of an impermeable surface. The operator keeps an IBC container on site which is attached to a forklift and hose which is used to dampen down the site surface in periods of hot and dry weather.

4.5.2 In regard to within the building where treatment operations are undertaken, the operator has a ride on sweeper which is deployed minimum daily to collect any dust that may have settled on the surface in the building. Areas will also be manually swept at the end of each working day.

4.5.3 The condition of site surface and impermeable concrete pad will be checked as part of site inspections any defects such as cracks will be repaired as soon as practicable to ensure the

site can be swept effectively and no material can become trapped and dry in hot weather producing dust.

4.6 Control Measures - Vehicle Movements

4.6.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from dusty site surfaces and vehicle movements include:

a) There is access to a permanent mains water supply on site which will be available at all times, particularly during hot and dry weather conditions to ensure dust suppression can be implemented.
b) Vehicle speed on site is restricted to 5mph. Signs are erected at the relevant areas of the site. This reduces the potential for re-suspension of dust and particulate matter.
c) Any mud/dust deposited off site will be treated as an emergency and cleaned by operatives using manual techniques or the operator will deploy their road sweeper.
d) Any dust/fluff cleared from mobile plant or other areas where dust/fluff could idle will be deposited into one of various mobile wheelie bins which are located on site.
e) The operator will dampen down surfaces using an IBC container filled with water and a hose; paying special attention to the areas where dust/debris is likely to build-up i.e. external yard surfacing.
f) The operator will shut down plant/machinery and brush them down to remove any dust/fluff that may have accumulated beneath them.

4.7 Control Measures – site suppression

4.7.1 **Hosepipes / mobile IBC bowser** – Utilised for further dampening of the site surface, it is not considered waste types will be dampened down due to the nature of the wastes i.e. batteries having a high risk of fire when coming into contact with water due to the short-circuiting potential from moisture.

4.7.2 The shredder is fitted with an enclosed dust extraction system which will be utilised at all times when shredding is being undertaken. an enclosed dust extraction system significantly reduces the potential for dust emissions off site by containing and controlling airborne particulates generated during the shredding process. The enclosure prevents dust from escaping into the surrounding environment, while the extraction system actively captures and filters fine particles at the source, to prevent uncontrolled release.

4.7.3 The dust extraction system on the shredder will be used continuously when shredding is being undertaken, however the hoses / dampening of external site surfaces will be utilised during the following circumstances where site management will inform staff to implement them:

a) If the weather has been dry for three days and surfaces are dry.
b) During dry/warm conditions i.e. temperatures above 75^0F.
c) During weather conditions when winds reach 4 or above on the Beaufort Wind Scale.

4.8 Control Measures – water supply

4.8.1 A permanent mains water supply is available on site to ensure that dust suppression on site surfaces can function effectively. Any external water pipes will be lagged to prevent frost damage during winter months and the operator has a notification alert system set up with the Met Office in the event of a drought or hot weather being imminent. This will enable the operator to source water in the short and long term and store in tanks / IBC containers prior to a potential water ban.

4.9 Control Measures – storage of waste

4.9.1 Shredded material is stored within sealed IBC containers within the enclosed waste processing building and therefore it is not considered to present a risk of dust from waste storage measures.

4.9.2 Waste batteries in their whole form (prior to shredding) are not considered to be inherently dusty and therefore do not present a risk of increased dust emissions from the external storage of whole batteries in secure containers.

4.10 Control Measures – mechanical treatment

4.10.1 **Shredding –** the shredder is fitted with an enclosed dust extraction system which will capture any airborne particles generated during the shredding process. As the batteries are shredded, dust is immediately drawn away from the shredding chamber through strategically placed vents or hoods creating suction to capture the dust particles. The particles will transgress through a series of filters including cyclones or HEPA filters designed to remove fine and potentially hazardous particles such as metal oxides found in battery dust. The captured dust is collected in sealed containers for safe disposal.

4.10.2 Mechanical treatment operations are undertaken within an enclosed building and therefore no additional risk is posed from external factors such as weather.

5 Dust Management Risk Assessment Model

5.1 Fundamental Considerations

5.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.

5.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.

5.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

5.2 Pathway

5.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:

- Air
- Ground
- Water
- Direct contact / exposure

5.3 Consequences

5.3.1 The following table highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table 5.5 in Section 5.7.

Table 5.1 – Consequences

Abbreviation	Consequences
A	MINOR INJURY
B	MAJOR INJURY
C	DEATH
D	AIR POLLUTION
E	WATER POLLUTION
F	POLLUTION OF LAND

5.4 Effects of Consequences

5.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in the table below:

Table 5.2 – Potential effects

Abbreviation	Effect of Consequences	Management Required
S	SEVERE	In all cases
Mo	MODERATE	In most cases
Mi	MILD	Occasionally
N	NEGLIGIBLE	No

5.4.2 Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

5.5 Risk Estimation and Evaluation (Probability/Frequency of Occurrence of Hazard)

5.5.1 The following table allows the likelihood of an occurrence of an identified risk to be assessed:

Table 5.3 – Likelihood

	Probability	Evaluation
1	Very likely	Could occur during any working day
2	Likely	Could occur regularly
3	Possible	Event possible
4	Unlikely	Event very unlikely

5.6 Risk Assessment Outcome (Combination of Probability & Consequence)

5.6.1 The following table shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

Table 5.4 – Risk assessment outcome

		Consequence			
		S	**Mo**	**Mi**	**N**
Probability	**1**	High	High	Medium	Low
	2	High	Medium	Low	Negligible
	3	Medium	Low	Negligible	N/A
	4	Low	Negligible	N/A	N/A

5.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

5.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.

5.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.

5.6.5 Where the risk assessment outcome is negligible, site staff should be made aware of the possibility of an occurrence, and contingency measures should be readily available to all staff should they be required.

5.7 Risk Assessment Table

5.7.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant, or situation.

5.7.2 The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures.

5.7.3 As discussed in the section above, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

5.7.4 Table 5.5 overleaf details the relevant pathways and receptors for each individual dust/emission source and relevant measures required to break these linkages. The control measures outlined in Section 4 will be included within these tables as well as additional specific measures.

SEE TABLES OVERLEAF

Table 5.5 – Source, Pathway, Receptor Routes

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action /recommendation
Dust / debris on site surfaces	Air dispersion	Local human population including neighbouring businesses, residential dwellings and surface water features, specifically: • Site workers and visitors. • Surrounding infrastructure (roads). • Residential properties. • Adjacent businesses.	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	3	Low	Site surfaces will be dampened using the mobile IBC water container and forklift or hoses and mains water. The operator will pay special attention to the areas where dust/debris is likely to build-up. All site operatives will be trained in these procedures, and it will be the responsibility of site management to ensure the measures have been carried out. Daily housekeeping inspections are undertaken on site to clear debris and litter and prevent it from leaving the permit boundary. Vehicle speed on site is restricted to 5mph. Signs are erected at the relevant areas of the site, including the main access gates, to advise drivers of the speed limit. This will reduce the re-suspension of dust and particulate matter. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted. Vehicles will be cleaned using an onsite hose pipe if required. Mud or debris deposited onto the public highway will be treated as an emergency and cleaned by site operatives. If required, the site manager will deploy road sweepers onto the public roads. Continuous monitoring regime in place to identify any potential for dust leaving site boundary.	Negligible
Vehicles tipping into waste reception/storage areas	Air dispersion	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Mild	4	N/A	Waste is not tipped or deposited into freestanding stockpiles. Waste remains in secure containers unless being sorted or processed via the treatment plant.	N/A

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action /recommendation
Loading of waste into treatment plant	Air dispersion	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	4	Negligible	Drop heights into plant hoppers will be kept to a minimum to prevent dust emissions. If operations permit, waste may be able to be directly tipped into the treatment plant. Whole batteries are not inherently dusty wastes and therefore the risk posed from depositing whole batteries into the treatment plant is negligible.	Negligible
Operation of treatment plant (shredder)	Air dispersion	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	2	Medium	The shredder is fitted with an enclosed dust extraction system which will capture any airborne particles generated during the shredding process. As the batteries are shredded, dust is immediately drawn away from the shredding chamber through strategically placed vents or hoods creating suction to capture the dust particles. The particles will transgress through a series of filters including cyclones or HEPA filters designed to remove fine and potentially hazardous particles such as metal oxides found in battery dust. The captured dust is collected in sealed containers for safe disposal. Operations will reduce or suspend if the site management detect the dust extraction system is not functioning correcting and notice dust emanating from the treatment plant. Shredded material is stored in secure IBC containers within the confines of the enclosed onsite building. The site undergoes continuous monitoring by operational staff who will continue to inspect and clean the site daily in addition to monitoring waste storage areas.	Low
Prolonged periods of dry/warm weather or conditions where winds reach 4+ on the Beaufort Wind Scale	Air dispersion	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Mild	3	Negligible	Whole batteries are not considered inherently dusty and therefore the external storage of batteries does not pose a risk from prolonged periods of dry/warm weather conditions. Suppression will be implanted in the form of dampening down site surfaces to ensure they do not become dry and produce dust from vehicles.	Negligible

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action /recommendation
Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site.	Air dispersion	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	3	Low	All vehicles, plant and equipment are serviced in line with manufacturer recommendations to ensure they are fit for purpose and ensure emissions are below the acceptable level. All vehicles, plant and equipment undergo daily inspections under the site's preventative maintenance schedule to ensure no visible faults are detected. Ongoing inspections will note any faults with machinery and if a fault detected, the site/compliance manager or TCM will decommission the plant/vehicle until it is fit for purpose.	Very Low - Negligible

6 Monitoring and Contingency Measures

6.1 Monitoring and Recording

Visual Dust Monitoring

6.1.1 Dust emissions at the site will be monitored by visual observation and recorded on the Dust Monitoring Form. There are no fixed locations for dust monitoring in the external yard.

6.1.2 Monitoring will take place within the building when shredding operations are being undertaken as this poses the highest risk of dust emissions. Monitoring results will be recorded on the Dust Monitoring Form, see Appendix IV.

6.1.3 Dust monitoring will be carried out during operational hours. Recorded visual monitoring will be undertaken at least twice a day, for a minimum of five minutes each time by appropriately trained site operatives. Visual monitoring will take place at the beginning of the working day and when operations with the highest potential to produce dust are taking place. This is considered to be the most beneficial method to ensure that mitigation measures being implemented on site are effective. It is expected that staff members will also check for dust emissions as they approach or leave the site boundary.

6.1.4 If excessive dust emissions (dust clouds) are observed, the site manager will establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken will be recorded.

6.1.5 If the operator increases suppression methods and the suppression methods are still not considered suitable, operations will reduce or cease until the problem has been fully rectified. Site management will be responsible for investigating dust issues and provide additional training to staff to prevent any re-occurrences.

6.1.6 Extra and unplanned monitoring will be carried out on site when conditions are particularly windy (4 or above on the Beaufort scale) or dry, new activities are being undertaken, new machinery is being used or following the receipt of a complaint or incident related to dust emissions.

6.1.7 Site operatives will continuously visually monitor dust emissions whilst plant is in operation and will control dust emissions using the procedures outlined in sections 4.2 – 4.11 and asking the site manager, compliance manager, TCM or third party for advice as required. Work procedures will be stopped/adjusted should it be evident significant dust is being emitted which has the potential to migrate offsite.

6.2 Staff Shortages / Human Error

6.2.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

6.2.2 All staff are trained and undergo toolbox talks every 12 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error has caused to an on-site dust issue, the site may suspend operations until the issue has been rectified, and the member of staff will be warned and re-trained accordingly.

6.3 Weather Conditions

6.3.1 The operator will receive Met Office weather alerts for conditions which could cause a potential on or off-site dust complaint:

a) Dust plumes occurring on site, potentially if winds reach 4 on the Beaufort Wind Scale
b) Winds exceeding 7 on the Beaufort Wind Scale
c) Dust escaping beyond the site boundary.
d) Droughts or periods of hot weather exceeding 3 major dry days which could lead to water shortages, hosepipe bans and excessive dust.

6.3.2 The operator will install the following preventative measures on site to avoid serious dust pollution:

WINDS EXCEEDING 7 ON THE BEAUFORT WIND SCALE

- No external sorting, processing or treatment of any wastes which are likely to be blown around during these wind conditions; operations would also be suspended where it is evident where dust is escaping beyond the site. Operations would only continue once the problem has been rectified.
- If higher winds i,e. amber/red alert on Met Office are present, the site will deploy the above measures and may be forced to close operations until conditions have improved.

DROUGHTS/WARM, DRY WEATHER

- In cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks which can be used to ensure suppression techniques can still function. Tanks will include IBCs filled with water and the two 10,000 litre water storage tanks on site to be utilised.
- The operator will contact the water company daily to see when water supply is available.

6.4 Operational Failure

6.4.1 The site manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures will be recorded in the site diary and operations suspended if dust is apparent.

6.4.2 All details of defects, problems and repairs carried out will be recorded on a daily inspection form. Detailed comments may also be recorded in the site diary. All repairs will be carried out as soon as practicable.

6.4.3 All repairs to site security will be made on the discovery of the damage and the site will be made secure until the repair has been carried out.

6.4.4 Any major defects found during site inspections 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, the EA will be contacted to agree a suitable timescale for repair.

6.4.5 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/ the 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 significant dust releases outside normal operations, the operator will cease operation, investigate, and resolve the issue before continuing.

7 Reporting and Complaints Response

7.1 Reporting of Complaints

7.1.1 Should a complaint regarding dust be received by the site, the complaint will be recorded on the complaints form and investigated in accordance with the complaint's procedure. Details of information to be recorded as a minimum are:

a) Who made the complaint.
b) Date & time of the complaint.
c) The nature of the complaint.
d) Action taken.
e) Signature.

7.1.2 The person completing the form will then, if possible, make a note of:

a) the weather conditions at the time of the problem (rain snow fog etc.)
b) strength and direction of the wind; and,
c) the activities being undertaken at the time of the complaint, particularly anything unusual.

7.1.3 The site manager will identify what caused the excessive dust emissions to be generated. If the excessive dust emissions have been caused by a procedure not being carried out properly, then staff will receive further training on the dust procedures and this DEMP. If the excessive dust emission has been caused by plant failure, then the plant will be repaired as soon as possible.

7.1.4 All complaints will be acknowledged and investigated, with resultant actions reported to the complainant. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day.

7.1.5 If three or more complaints are received on the same working day, the TCM will escalate the complaint, review site operations taking place and commit to stop operations until the

cause has been identified. The known cause will not commence until the issue has resolved i.e. targeted suppression or plant malfunction and repair.

7.1.6 If the source cannot be ascertained with 100% confidence, the site manager, compliance manager or TCM will either suspend or reduce the likely dust/particulate generating activities.

7.1.7 The EA will be notified by email of any third-party dust complaints received by the end of the working day including the complainant and the outcome of the investigation. Where complaints are substantiated as causing or likely to cause significant pollution, then the EA will be notified without delay, as required by conditions in the EP.

7.2 Liaison with Neighbours

7.2.1 A Site Notice Board will be located at the entrance to the Site. The notice board will include the following information:

a) The Permit holder's name.
b) The operators name.
c) An emergency contact name and telephone number.
d) A statement that the Site is permitted by Natural Resources Wales.
e) The Environmental Permit Reference.
f) The Environment Agency's national numbers.

7.2.2 The provision of the above information will ensure that members of the community can contact the operator should they be concerned by dust emissions or wish to make a complaint. This also applies to any events that may happen when the site is unmanned / not operational.

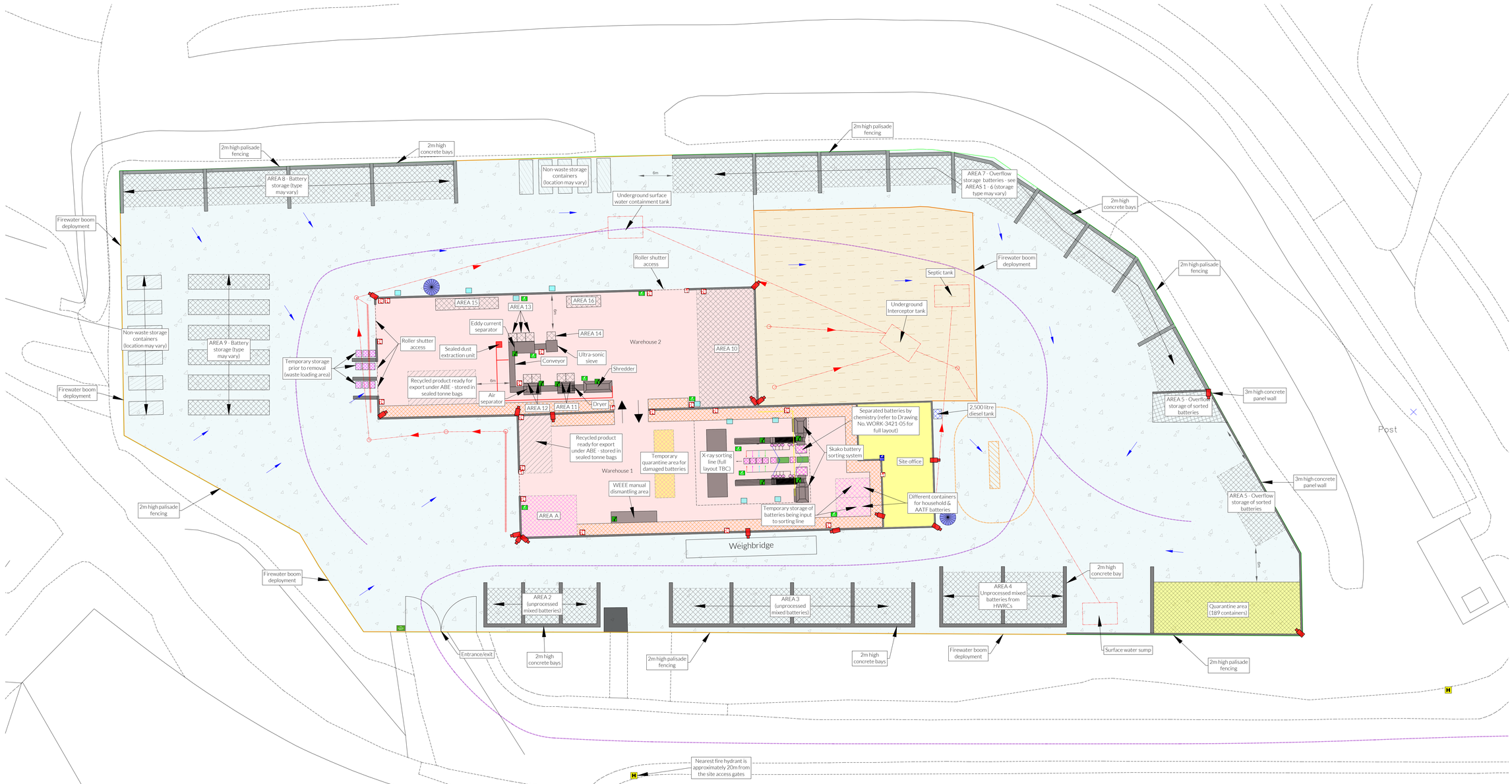
7.2.3 In the extreme event of significant but temporary dust releases outside normal operations, neighbours will be contacted to advise them of the situation and the action being taken. The EA will also be notified.

7.2.4 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

7.2.5 If any dust complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete the form in Appendix III which will be kept for inspection on request by the LA and/or EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Dust complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.

Appendix I

Drawings



Storage Area Details

Plan Ref	Description	Storage type / containment	Max width of pile (m)	Max length of pile (m)	Max height of pile (m)	Approx. area (m2)	Conversion factor used	Approx. volume (m3)	Approx. no. of pallets / containers	Approx. tonnage	Maximum storage duration	Comments
AREA A	Battery checking and inspection area prior to sorting and treatment	Sealed acid-resistant containers (dolav pallet boxes)	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	Maximum 48 containers	38.5 tonnes (800kg per container)	<12 hours	Containers are initially inspected here to check for any non-conforming items prior to storage in the yard before processing. Battery boxes will not be stacked. No waste is stored here outside of operational hours
AREA 2	Unprocessed mixed batteries	Sealed acid-resistant containers (dolav pallet boxes) with weatherproof covering	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 containers per bay	38.5 tonnes (800kg per container)	<12 months	Containers are stored within bays stacked two containers high. All containers will be stored so they are accessible from at least one side.
AREA 3	Unprocessed mixed batteries from AATF S	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 containers per bay	38.5 tonnes (800kg per container)	<12 months	As above
AREA 4	Unprocessed mixed batteries from HWRCs	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	224 containers	179 tonnes (800kg per container)	<12 months	As above
AREA 5	Overflow storage area for sorted batteries (by chemistry)	Recycled batteries stored in tonne bags on pallets with tarpaulin placed over each pallet	1 (per pallet)	1.2 (per pallet)	1	1.2 (per pallet)	1	1 per pallet	84 pallets (84 bags)	84 tonnes (1 tonne per bag)	<12 months	Batteries stored will have been sorted by chemistry and stored in tonne bags on pallets ready for despatch. Sorted batteries stored in the yard will have tarpaulin placed over them
AREA 6	Overflow storage area for sorted batteries (by chemistry)	Recycled batteries stored in tonne bags on pallets with tarpaulin placed over each pallet	1 (per pallet)	1.2 (per pallet)	1	1.2 (per pallet)	1	1 per pallet	84 pallets (84 bags)	84 tonnes (1 tonne per bag)	<12 months	As above
AREA 7	Overflow storage batteries - see AREAS 1 - 6 (storage type may vary)	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	150 containers	100 - 120 tonnes 800kg per container)	<12 months	As above
AREA 8	Battery storage (storage type may vary)	Depending on the battery type unprocessed batteries will be stored in either dolav boxes, barrels or tonne bags.	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	72 pallets (648 barrels or 72 containers)	24.6 – 72 tonnes (342kg per pallet of barrels or 800kg per container)	<12 months	Batteries will either have been sorted by chemistry or unsorted and awaiting processing.
AREA 9	Battery storage (storage type may vary)	As above	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	48 pallets per row (432 barrels or 48 containers)	16.4 – 48 tonnes per row (342kg per pallet of barrels or 800kg per container)	<12 months	As above
AREA 10	Processed / sorted batteries for shredding (sorted by chemistry)	Sorted batteries stored in pallet boxes awaiting shredding	1 (per container)	1.2 (per container)	1.7 (0.85m per container)	1.2 (per container)	1	1 per container	170 containers	136 tonnes (800kg per container)	<12 months	Batteries will have been sorted by chemistry and are awaiting further processing via shredding
AREA 11	Electrolyte & volatiles	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	2 containers	1 tonne per container	<12 months	Container moved to AREA 14 when at capacity and replenished with empty container
AREA 12	Paper & plastic	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	2 containers	1 tonne per container	<12 months	As above
AREA 13	Ferrous metal, aluminium, copper	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	3 containers	1 tonne per container	<12 months	As above
AREA 14	Zinc / Manganese powder (black mass)	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	1 container	1 tonne per container	<12 months	As above
AREA 15	Dismantled WEEE	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	5 containers	1 tonne per container	<12 months	Containers replenished with empty ones when full / removed
AREA 16	Overflow storage from shredding line (contents may vary)	Sealed IBC bulk containers	1 (per container)	1.2 (per container)	1	1.2 (per container)	1	1.2 (per container)	5 - 10 containers	1 tonne per container	<12 months	Containers replenished with empty ones when full / removed

NOTES

Drawing for indication only. All dimensions in millimetres (mm) unless otherwise specified. This drawing is copyright and property of Oaktree Environmental Ltd.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	01.04.25	JH	Initial drawing
A	23.04.25	JH/CP	Client comments
B	25.04.25	EG	Client comments
C	19.05.25	EG	Waste storage table amendments
D	13.06.25	EG	Application copy
E	23.09.25	EG	EA comments

KEY:

- Permit boundary
- Waste storage areas
- Non-waste storage areas
- Temporary storage/sorting areas
- Non-waste fuel, fluids
- Pedestrian walkway
- Impermeable surfaced areas
- Hardstanding areas
- Waste recycling/ storage buildings (impermeable surfaced floor)
- Office/welfare
- Out of hours plant storage
- 300mm thick solid concrete wall
- 600mm thick interlocking concrete lego block
- Quarantine area
- Firefighting equipment/extinguishers (indicative locations)
- Saltwater solution drum for lithium batteries
- Fire alarms (indicative locations)
- Spill kits (indicative locations)
- Plant shut off
- Mains Water
- Access route for emergency services
- Fire hydrant
- Fire assembly points
- Pan,tilt & zone cameras with 360 50cm coverage
- Surface water fall direction
- Underground contaminated (potentially contaminated surface water
- ACO surface drain
- Treated (clean) surface water
- Manholes (clean/contaminated)
- Location of penstock valve to shut off drainage system
- Water storage tanks (indicative locations)
- Firewater polyboom deployment

N

Scale Bar 0 2 4 6 8 10m

TITLE: SITE LAYOUT & FIRE PLAN

CLIENT: Recycling Lives Compliance Services Limited

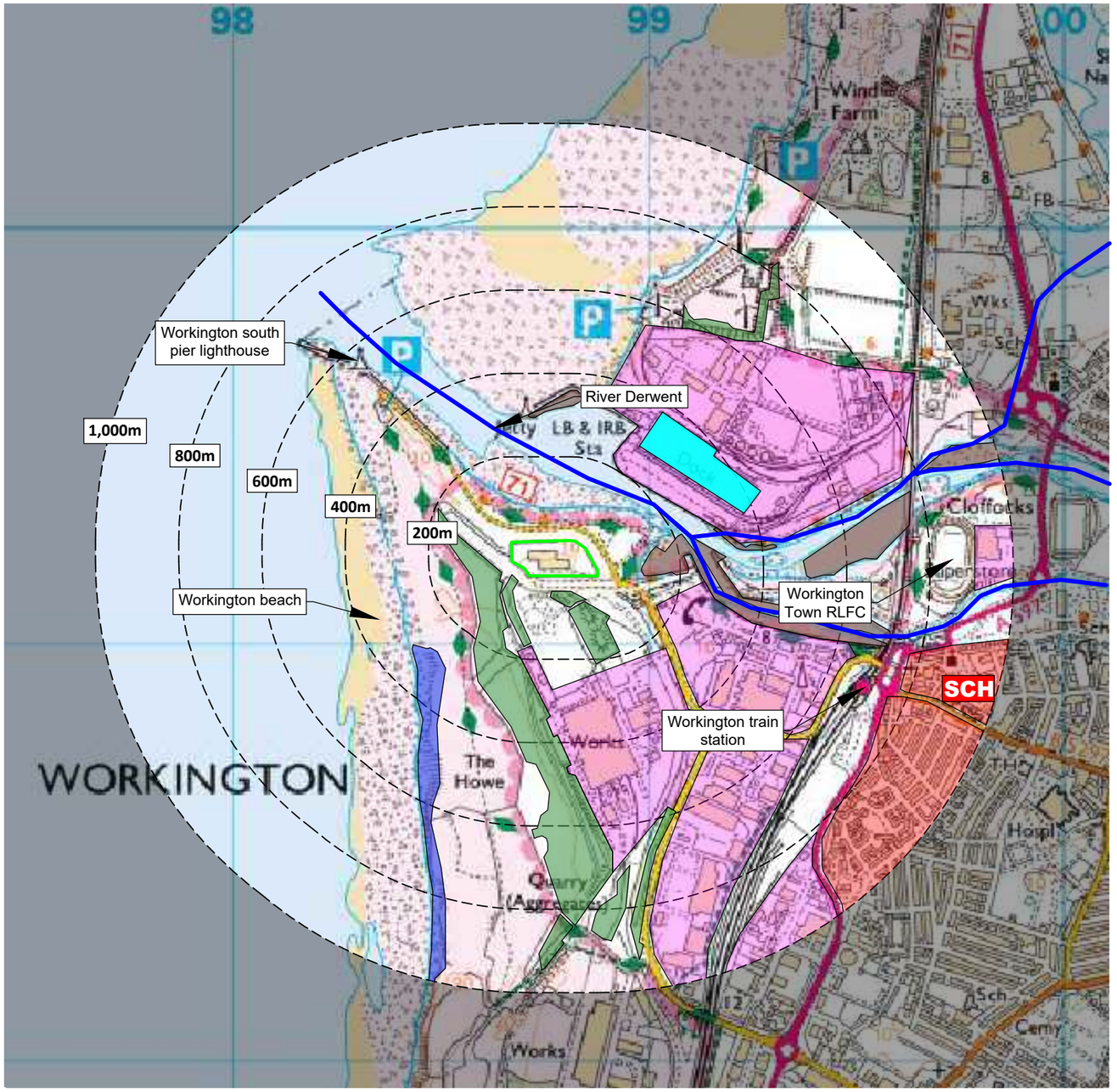
PROJECT/SITE: Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS

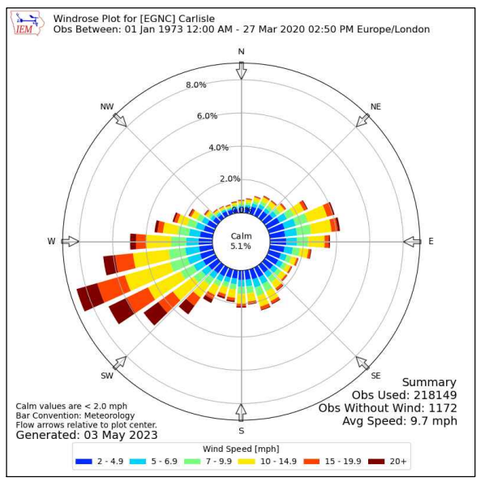
SCALE @ A0:	CLIENT NO:	JOB NO:
1:250	3421	002
DRAWING NO:	REV:	STATUS:
WORK-3421-03	E	Issued
DATE:	DRAWN:	CHECKED:
23.09.25	JH/CP/EG	RL

Oaktree Environmental
Waste, Planning & Environmental Consultants

KEY:

- Permit boundary
- Main river
- Surface water body (river / stream / pond / pool / lake)
- Areas with mix of residential, retail and commercial properties
- Workplaces (includes agriculture industry, commerce and retail)
- Residential blocks
- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- Schools
- Woodland areas
- Priority Habitat Inventory - Saline Lagoons
- Priority Habitat Inventory - Mudflats
- Priority Habitat Inventory - Maritime Cliffs & Slopes
- Priority Habitat Inventory - Deciduous Woodland





Compass Wind Rose for (EGNC) Carlisle Period 1973-2020
- source: Iowa State University

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	22.01.25	JH	Initial drawing

N

Scale Bar (1:12,500)

0 100 200 300 400 500m

TITLE:
RECEPTOR PLAN

CLIENT:
Recycling Lives Compliance Services Limited

PROJECT/SITE:
Recycling Lives Services Workington, Isabella Road, Workington, Cumbria CA14 2JS

SCALE @ A3:	CLIENT NO:	JOB NO:
1:12,500	3421	002

DRAWING NO:	REV:	STATUS:
WORK-3421-04	-	Issued

DATE:	DRAWN:	CHECKED:
22.01.25	JH	CP

Oaktree Environmental
Waste, Planning & Environmental Consultants

Appendix II

Inspection Checklist

RECYCLING LIVES COMPLIANCE SERVICES LIMITED **DAILY INSPECTION CHECKLIST**			
DATE			
ITEM FOR VISUAL INSPECTION **↓**	**TIME OF INSPECTION (START)** **TIME OF INSPECTION (FINISH)**	**CHECKED Y/N**	**REMEDIAL ACTION REQUIRED**
EMERGENCY ACCESS (FREE FROM BLOCKAGES)			
COMBUSTIBLE WASTE STORAGE (AWAY FROM POTENTIAL IGNITION SOURCES)			
FIRE WATCH AT THE END OF THE WORKING DAY TO INSPECT FOR SIGNS OF SELF-HEATING, SMOKE OR FIRE AND ENSURE EXHUASTS ON PLANT ARE COOL ETC			
DUST/FLUFF AROUND UNIT CHECK			
LITTER (I.E. LOOSE COMBUSTIBLE WASTE MATERIALS)			
PLANT/EQUIPMENT MAINTENANCE CHECKS (BEFORE AND AFTER USE)			
FIRE QUARANTINE AREA IS CLEAR OF WASTE			
DUST MONITORING			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	
SHEET		***OF***	

RECYCLING LIVES COMPLIANCE SERVICES LIMITED

WEEKLY INSPECTION CHECKLIST

WEEK COMMENCING			
ITEM FOR VISUAL INSPECTION ↓	**TIME OF INSPECTION (START)** / **TIME OF INSPECTION (FINISH)**	**CHECKED Y/N**	**REMEDIAL ACTION REQUIRED**
SITE SECURITY (CCTV SYSTEM IS WORKING, FENCING AROUND SITE PERIMETER IS IN GOOD CONDITION, LOCK ON GATED ENTRANCE IS WORKING)			
WASTE STORAGE AREA (NOT EXCEEDING THE DIMENSIONS INCLUDED IN THE FIRE PREVENTION PLAN)			
WEATHER FORECAST (CHECK FOR UPCOMING WEEK TO DETERMINE IF WASTE OPERATIONS ARE LIKELY TO BE IMPACTED)			
FIRE FIGHTING EQUIPMENT AND SPILL KITS E.G. FIRE EXTINGUISHERS ARE IN PLACE AND FULLY STOCKED			
INTEGRITY OF CONCRETE WALLS / BAYS (NO CRACKS ETC)			
INTEGRITY OF IMPERMEABLE PAD (NO CRACKS ETC)			
HOLDING TANK CAPACITY			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			

NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	
SHEET		**OF**	

RECYCLING LIVES COMPLIANCE SERVICES LIMITED **MONTHLY INSPECTION CHECKLIST**			
WEEK COMMENCING			
ITEM FOR VISUAL INSPECTION **↓**	**TIME OF INSPECTION (START)** **TIME OF INSPECTION (FINISH)**	**CHECKED Y/N**	**REMEDIAL ACTION REQUIRED**
HOSES AVAILABLE ON SITE AND FREE FROM HOLES (IN GOOD WORKING CONDIITON)			
ELECTRICALS (WIRES SHOULD NOT BE FRAYED / DAMAGED AND SOCKETS NOT OVERLOADED)			
SPILL KITS / FIRE EXTINGUISHERS AVAILABLE AND FULLY STOCKED			
FIREWATER BOOMS AVAILABLE			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	
SHEET		**OF**	

Appendix III

Complaints Recording Form

Complaints Report Form	
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 Written Management System	
Date changes implemented	
Form completed by	
Signed	
Date completed	

Appendix IV

Dust Monitoring Form

Recycling Lives Compliance Services Limited **DUST MONITORING FORM**				
WEEK BEGINNING				
DAY/DATE/TIME OF INSPECTION				
SHEET 1 OF	**COMMENTS BELOW (AS MUCH DETAIL AS POSSIBLE); IF COMMENT IS NO – ADD FURTHER COMMENTS**			
DAILY RECORDING INFORMATION	**DUST MONITORING POINT 1**	**DUST MONITORING POINT 2**	**DUST MONITORING POINT 3**	**OTHER AREA OF SITE - SPECIFY**
WEATHER CONDITIONS				
WEATHER TEMPERATURE				
WIND SPEED				
WIND DIRECTION				
PERIMETER INFRASTRUCTURE SUITABLE				
WATER JET SYSTEM FUNCTIONING				
ARE WASTE STORAGE STOCKPILES BELOW 5m				
DUSTY MATERIAL STORAGE VISIBLE FROM LOCATION				
ANY NOTICEABLE DUST / PARTICULATES ON THE GROUND NEAR THE LOCATION				
ANY DUST APPARENT OFF SITE				
EMISSIONS FROM PLANT/EQUIPMENT VISIBLE				
SMOKE FROM PLANT APPEAR TO BE SUITABLE				
HAS SITE MANAGEMENT BEEN INFORED OF THE INSPECTION				
DOES ACTION NEED TO BE TAKEN				
INSPECTION CARRIED OUT BY				
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):				
CHECKED BY		**SIGNATURE**		
POSITION		**DATE**		